

Planning Justification Report

2699 Victoria Street North & Greenhouse Road

Thomasfield Homes Ltd.

Township of Woolwich

Official Plan Amendment

Zoning By-law Amendment

Modifications to Draft Plan of Subdivision

June 2026



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Executive Summary

Three development applications (Official Plan Amendment, Zoning By-law Amendment, and Modifications to Draft Plan of Subdivision) have been submitted on behalf of Thomasfield Homes Ltd. to facilitate the development of two parcels of land located at 2699 Victoria Street North and Greenhouse Road in the Breslau Urban Area in the Township of Woolwich. The Subject Lands occupy a combined total of approximately 43.07 hectares. The Proposed Development will contain an anticipated 545–624 dwelling units of varying types and sizes along with 1,400 m² of commercial floor space.

The Subject Lands are part of the Hopewell Crossing subdivision (Draft Plan 30T-11701), which received draft approval in May 2016. The Subject Lands are currently identified as Employment Lands on Draft Plan 30T-11701. Modifications to the Draft Plan and associated conditions of draft approval are being requested in order to accommodate the proposed uses.

The Subject Lands contain two wetland features, with a combined area of approximately 15 hectares. No development is being proposed within either feature, which will be protected by buffer areas that, once implemented, will provide a “substantial gain in natural cover,” according to the EIS prepared in support of these development applications.

The developable portions of the Subject Lands are currently designated a combination of “Employment Land I”, “Employment Land II”, and “Open Space / Recreational” in the Township’s Official Plan. The proposed re-designation of these lands to “Low/Medium Density Residential” and “Medium/High Density Residential” aligns with the Preferred Land Use Plan endorsed by Township Council in February 2025 as part of the Township’s on-going Official Plan Update.

The applications submitted also propose to change the zoning of the Subject Lands from the current combination of “EM-5” and “EM-6” to a combination of “R-5A”, “R-6A”, and “MU-2”. The wetland features and associated buffer areas will retain their current “O-2” zoning. Holding provisions are proposed for one of the blocks to be zoned “R-6A”, requiring confirmation of water supply from the Region of Waterloo before development on that block may proceed. Existing holding provisions, which impose conditions regarding the development of a day-care centre/school on the blocks to be zoned “MU-2”, will be retained.

The Proposed Development is consistent with the policies in the PPS 2024 and conforms with the Township’s current Official Plan, including those portions of the Region’s Official Plan that remain in effect for the Township.

1. Introduction

1.1 Development Applications & Subject Lands

GSP Group Inc. (“GSP”) has prepared this Planning Justification Report in support of three development applications submitted on behalf of Thomasfield Homes Limited (“Thomasfield”) regarding proposed development in the Township of Woolwich: an Official Plan Amendment application, a Zone Change application, and a request for modifications to a Draft Plan of Subdivision.

The properties that are the subject of these applications (the “Subject Lands”) comprise two parcels located on the south side of Victoria Street North (Highway 7) and east of Greenhouse Road in the Breslau Urban Area (see **Figure 1**). The Subject Lands are part of the Hopewell Crossing Subdivision (Draft Plan 30T-11701), which occupies a total area of approximately 135.5 hectares south of Victoria Street North on both the west and east sides of Greenhouse Road.

The Subject Lands occupy a combined total area of approximately 43.07 hectares. The larger parcel (approx. 42.04 ha) is known by the municipal address of 2699 Victoria Street North and is described legally as Part of Lots 105 and 106, German Company Tract, Waterloo, and Part of Part 1 of Plan 58R-15960. The smaller parcel (approx. 1.03 ha), which is identified as Block 52 of Draft Plan 30T-11701 (see Section 1.2 below for further details) and is described legally as Block 124 of Plan 58M-657, has not yet been assigned a municipal address.

A third parcel of land, approximately 0.72 hectares in area, is situated between the two parcels comprising the Subject Lands. This parcel, identified as Block 78 of Draft Plan 30T-11701, was conveyed to the Township of Woolwich during the registration of Phase 1B of the Hopewell Crossing Subdivision. The parcel has not been assigned a municipal address but is described legally as Block 128 of Plan 58M-657. This third parcel is not the subject of the applications submitted to the Township.

At present, there is a single detached dwelling located at the northeasterly corner of the larger parcel, occupying an area of approximately 1.6 hectares. Aside from this dwelling, the Subject Lands are currently unoccupied by buildings or structures. The easterly half of the largest parcel (an area of approximately 25.2 ha) is occupied by agricultural crop fields, while the westerly portion of this parcel contains a large wetland of approximately 15.3 ha. A smaller wetland, measuring approximately 1.14 ha, is located within the crop fields on the easterly half of the parcel.

The Subject Lands are abutted by two nurseries: Belgian Nursery, located northwest of the Subject Lands at 2615 Victoria Street North, and Grobe Nursery & Garden Centre, southwest of the Subject Lands at 1787 Greenhouse Road. The abutting property to the east of the Subject Lands is occupied by Memory Gardens Cemetery. A small parcel abutting the northwesterly boundary of Block 52 is occupied by Union Gas infrastructure.

The parcel immediately to the north of the Subject Lands, located at 2590 Victoria Street North, is currently vacant. That parcel, occupying approximately 28.5 hectares, is owned by another developer and is the subject of development applications to the Township (File No. 2025-10: Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision).

1.2 Hopewell Crossing Subdivision

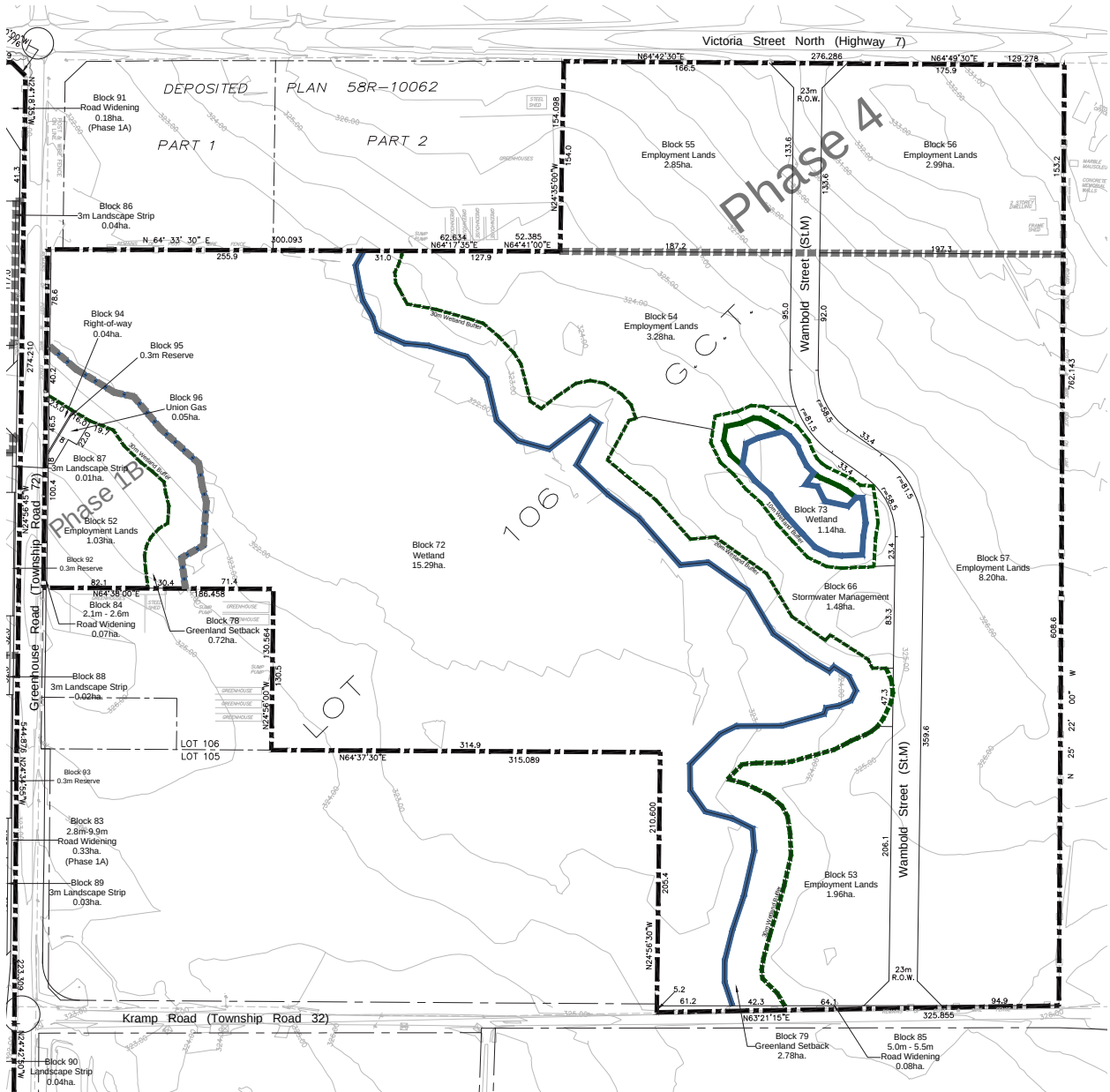
The Subject Lands are identified as Blocks 52–57, 66, 72, 79, and 85 on Draft Plan 30T-11701 (see **Figure 2**), which received draft approval in May 2016. The draft-approved subdivision is divided into four phases. At present, most of Phase 1 west of Greenhouse Road has been constructed, while Phase 2A and Phase 2B (also west of Greenhouse Road) are under development. Block 52 is part of Phase 1B, while the remainder of the Subject Lands are part of Phase 4.

Table 1 below identifies the land use description and area of each block comprising the Subject Lands, as currently shown on Draft Plan 30T-11701. The current version of Draft Plan 30T-11701 designates Blocks 52–57 as “Employment Lands”, with the remaining blocks being designated for stormwater management purposes (Block 66) or to provide protection for natural heritage features (Blocks 72, 73, and 79).

Table 1 – Current Designations & Areas of Subject Lands (Draft Plan 30T-11701)

Block No.	Current Land Use Description	Area [ha]	Block No.	Current Land Use Description	Area [ha]
52	Employment Lands	1.03	66	Stormwater Management	1.48
53	Employment Lands	1.96	72	Wetland	15.29
54	Employment Lands	3.28	73	Wetland	1.14
55	Employment Lands	2.85	79	Greenland Setback	2.78
56	Employment Lands	2.99	85	Road Widening	0.08
57	Employment Lands	8.20			



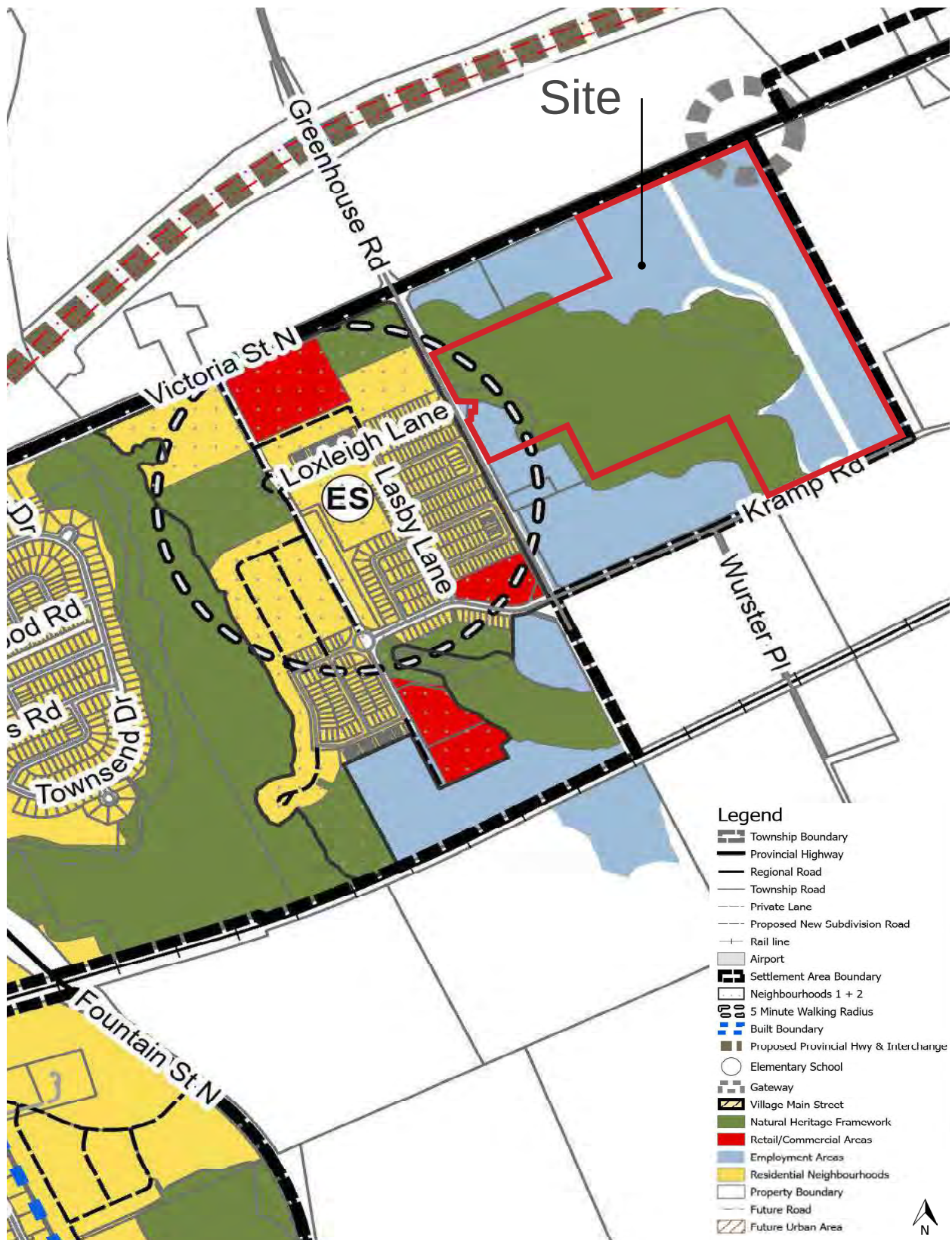


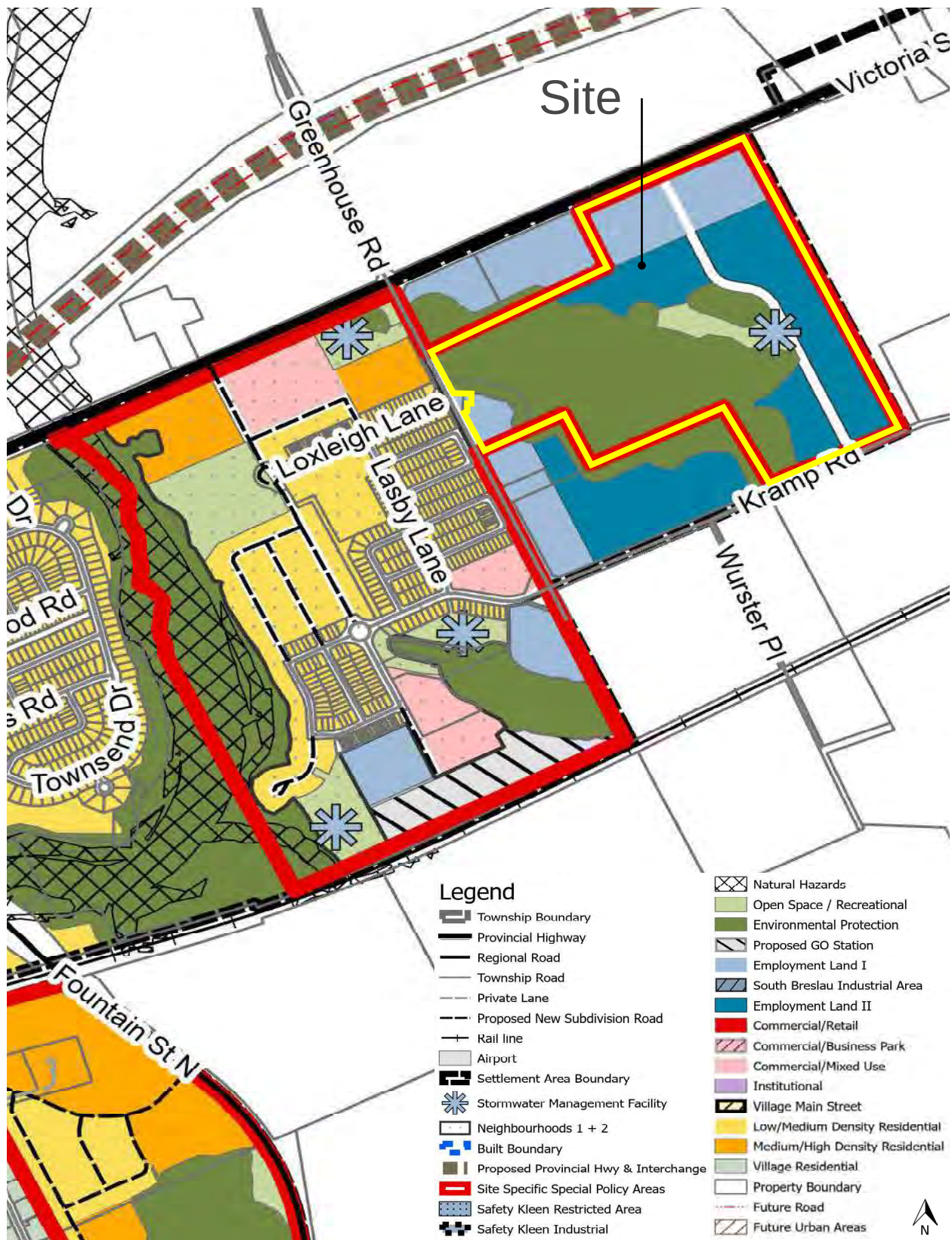
Subject Lands (Draft Plan 30T-11701)

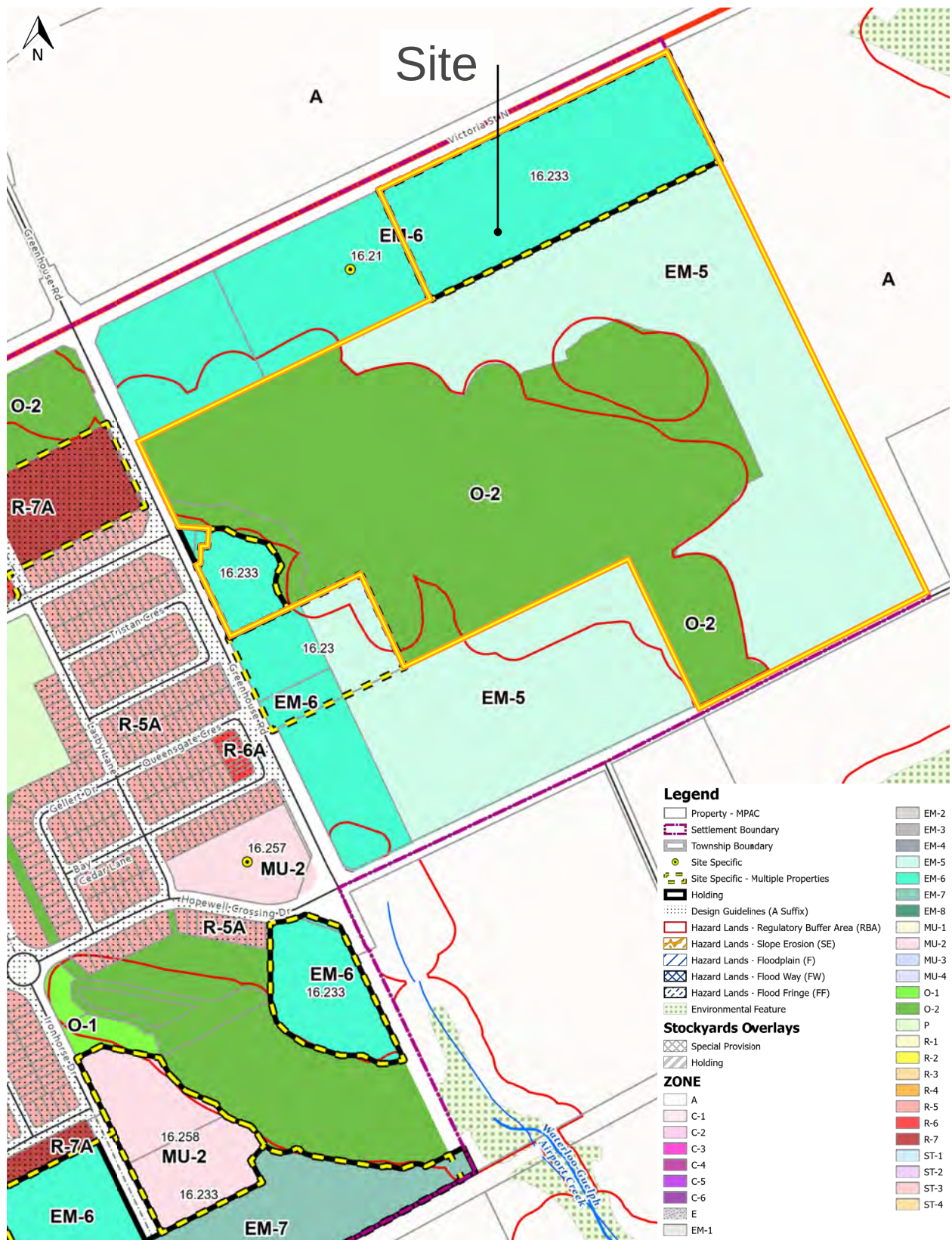
Source: GSP Group (2025)

Figure

2







Zoning Map B28
Source: Township of Woolwich Zoning Map: B28 - Breslau (2024)

Figure
5

Schedule A to Chapter 7 of the Township's Official Plan (Breslau - Urban Structure) designates the Subject Lands as a combination of "Employment Area" and "Natural Heritage Framework" (see **Figure 3**). Schedule B to Chapter 7 of the Official Plan (Breslau - Land Use Plan) shows the Subject Lands as being designated a combination of "Employment Land I" (Blocks 52, 55, and 56), "Employment Land II" (Blocks 53, 54, and 57), "Open Space / Recreational" (Block 66), and "Environmental Protection" (Blocks 72, 73, and 79): see **Figure 4** above. The Subject Lands are also subject to site-specific provisions set out in Section 7.26.10.1 of the Township's Official Plan, discussed further in Section 2.4 below.

According to Map B28 of the Township's Zoning By-law No. 26-2024 (see **Figure 5** above), the Subject Lands are currently zoned a combination of "EM-5" (Blocks 53, 54, and 57), "EM-6" (Blocks 52, 55, and 56), and "O-2" (Blocks 66, 72, 73, and 79). The blocks in the "EM-6" zone are subject to site-specific provisions set out in Section 16.233 of the Zoning By-law: see Section 2.3 below for further discussion.

The current land use designations and zoning were applied to the Subject Lands through Official Plan Amendment ("OPA") and Zone Change applications that were submitted along with the original Draft Plan of Subdivision application for Hopewell Crossing in March 2011. Those original applications were deemed complete on July 12, 2011, by the Township of Woolwich (the "Township") and on August 3, 2011, by the Region of Waterloo (the "Region"). The circulation of the Hopewell Crossing applications was delayed because of appeals related to the Region's Official Plan, which were resolved in 2015.

In June 2013, Thomasfield appealed to the Ontario Municipal Board ("OMB"), now the Ontario Land Tribunal ("OLT"), regarding the Township's and Region's failure to make decisions on the Hopewell Crossing applications. Following the execution of Minutes of Settlement between Thomasfield and the Township, dated May 18, 2016, the OMB issued a decision (dated May 25, 2016) approving the OPA, amending the Township's Zoning By-law, and approving the Draft Plan of Subdivision, subject to the Township's and Region's conditions of draft approval.¹

On April 24, 2018, the OMB approved a request, made on consent, to amend the Draft Plan and associated draft approval conditions. The 2018 amendments created a Road Widening block (Block 91) at the southwesterly angle of the intersection between Victoria Street North and Greenhouse Road, as well as three 0.3-metre Reserve blocks (Blocks 92, 93, and 95), a "Right-of-Way" block (Block 94), and a block for Union Gas infrastructure (Block 96). Three

¹ *Memorandum of Oral Decision Delivered by Steven Stefanko on May 18, 2016 and Order of the Board* [OMB Decision in Case PL130719], 25 May 2016, at para. 8.

additional 0.3-metre Reserve blocks (Blocks 97–99) were created through the registration of Phase 1.

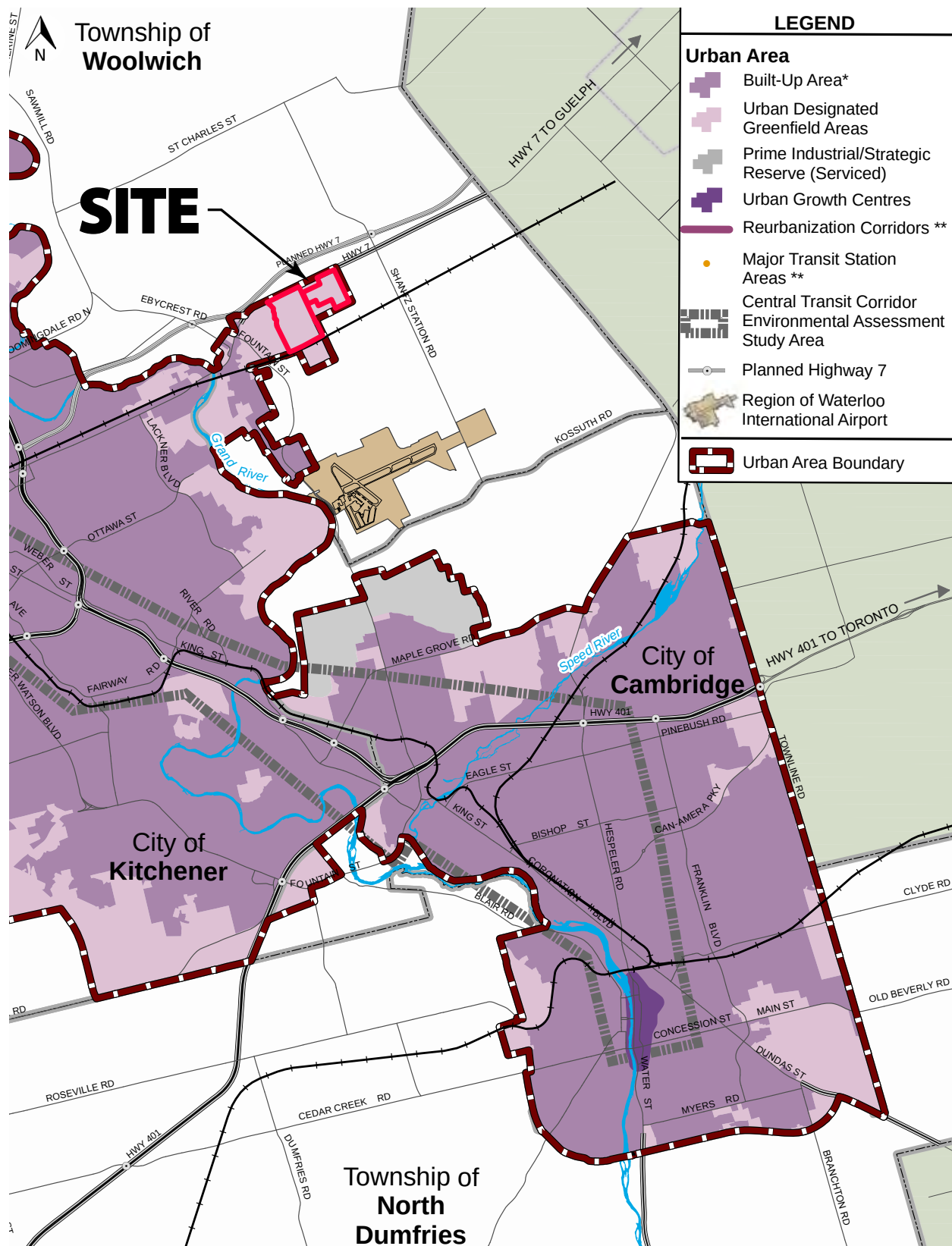
A further request was made to the OLT in November 2025 for additional amendments to Draft Plan 30T-11701 and the associated conditions of draft approval. The principal purpose of these amendments was to incorporate the preferred alignment for the future Breslau East Connector Road, which was established through a Municipal Class Environmental Assessment process and endorsed by Township Council in August 2022. The requested amendments also divided two blocks (Blocks 48 and 50) that had been located in both Phase 2A and Phase 2C by creating two new blocks (Blocks 100 and 101) in Phase 2C, leaving the remnant portions of the original Blocks 48 and 50 entirely within Phase 2A. None of the requested amendments pertain directly to the blocks that are the subject of the development applications discussed in this report. The OLT approved the changes in a decision issued in Case No. OLT-25-000541 (formerly PL130737) on May 1, 2026.

Separate applications have been submitted on behalf of Thomasfield regarding other blocks in the Hopewell Crossing Subdivision, specifically regarding development proposed on Blocks 80, 100, and 101 in Phase 2C/2D of the Draft Plan. To clarify, those applications are not directly related to the Subject Lands and should be considered as fully separate development applications.

1.3 Breslau Settlement Plan

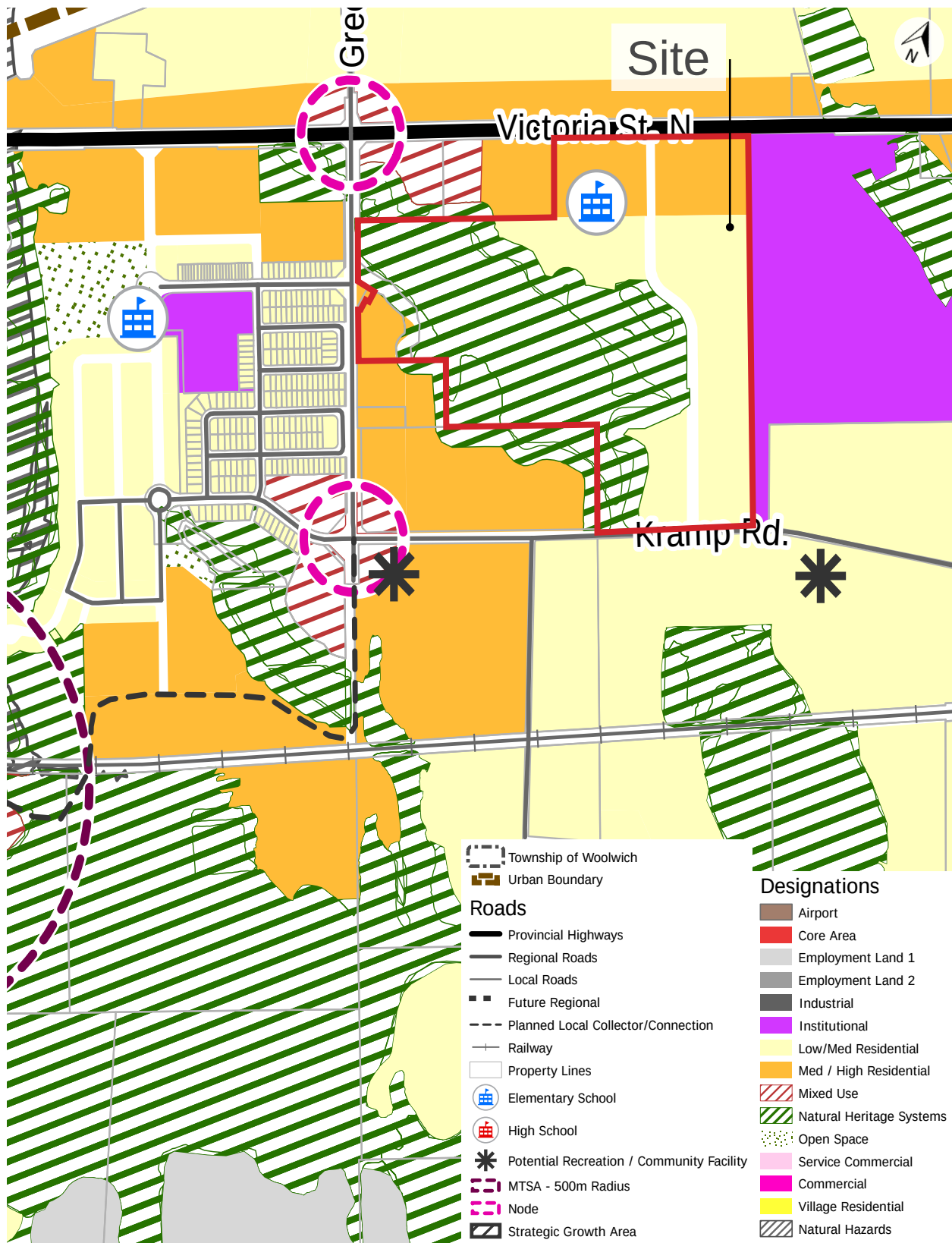
The Subject Lands are identified as part of the Breslau Urban Area in the 2009 update to the Region of Waterloo's Regional Official Plan ("ROP"), which was approved by the Ministry of Municipal Affairs and Housing on January 4, 2011. Map 3a of the ROP, as approved in 2011 (see **Figure 6**), identifies the Subject Lands as part of the "Urban Designated Greenfield Areas".

The Township's current Official Plan was adopted in September 2021 and approved by the Region, with modifications and deferrals, on June 22, 2022. On August 18, 2022, the Region adopted Amendment No. 6 to its Official Plan ("ROPA 6"), which was approved pursuant to subs. 1 (2) of the *Official Plan Adjustments Act, 2023* (S.O. 2023, c. 24, Sched. 1), as modified in accordance with paragraph 8 of section 2 of that Act. Under the *Official Plan Adjustments Act, 2023*, the approval of ROPA 6 is deemed to have been given on April 11, 2023.



ROP Map 3a: Urban Areas (as approved in 2011)
Source: Regional Official Plan Map 3a, Urban Areas (2011)

Figure
6



Among other things, ROPA 6 significantly expanded the borders of the Breslau Urban Area, by approximately 1,904.9 hectares (from 606.3 hectares to 2,511.2 hectares in total).² In response to the expansion, the Township initiated an update to the Breslau Settlement Plan and hosted two public open houses: one on June 22, 2023, at which three land use concepts were presented, and a second on June 26, 2024, at which the Township presented the Preferred Land Use Plan for the Breslau Urban Area. The Preferred Land Use Plan, which was endorsed by Council on February 18, 2025 (see **Figure 7** above), shows the Subject Lands being designated a combination of “Low/Med Residential” (Blocks 53, 54, and 57 on the current Draft Plan), “Med/High Residential” (Blocks 52, 55, and 56), and “Natural Heritage Systems” (Blocks 66, 72, 73, 78 and 79).

The policies developed for the Breslau Settlement Plan, along with the Preferred Land Use Plan, have been incorporated into Chapter 6 of the Township’s new Official Plan. A draft version of the new Official Plan was made publicly available on March 11, 2026. At the time the applications regarding the Subject Lands were submitted, the Official Plan in force and effect for the Township of Woolwich was the Official Plan adopted on September 21, 2021, and approved with modifications on June 22, 2022 (as subsequently amended from time to time), referred to in this report as the “current Official Plan”.

1.4 Pre-application Consultation

GSP submitted a request on behalf of Thomasfield for Pre-application Consultation with the Township regarding the proposed development of the Subject Lands in July/August 2025. Comments were received from the Township’s Development Services Department (Planning and Development Engineering), the Region of Waterloo, the Grand River Conservation Authority, and the Ontario Ministry of Transportation (because the Subject Lands abut Victoria Street North / Highway 7). A full comment–response matrix was appended to the cover letter that accompanied the submission of these development applications to the Township.

The complete application requirements set out in the Pre-Consultation Comment Report included a number of matters to be addressed within this Planning Justification Report (“PJR”), which can be found in Section 3 below, as well as an Environmental Impact Study, Functional Servicing & Stormwater Management Report, Geotechnical Investigation, Hydrogeological Study, Transportation Impact Study, and Noise Study, all of which are discussed in Section 4 of this PJR. An Archaeological Assessment was also identified as a

² Source: Township of Woolwich, *Development Services Staff Report No. D13-2025* (May 27, 2025), p. 2.

requirement. A Stage 1–2 Archaeological Assessment was undertaken by Golder Associates Ltd. to support the original Hopewell Crossing applications in 2011. The findings of that assessment are discussed in Section 5.1.3 of this report (more specifically starting on p. 79).

Draft versions of the proposed Official Plan Amendment, Zoning By-law Amendment, and modifications to the conditions of draft approval are presented in **Appendix “A”**, **Appendix “B”**, and **Appendix “C”**, respectively.

1.5 Report Structure & Contents

Following this introductory section, the remaining sections of this Planning Justification Report (“PJR”) have been organized as follows:

- Section 2 (Planning Applications) describes the proposed development, explains the proposed modifications to the Draft Plan and associated conditions, and explains the proposed amendments to the Township’s Zoning By-law and Official Plan.
- Section 3 (Planning & Design Considerations) addresses items identified during Pre-submission Consultation (sustainable design, urban design, affordable housing, and financial impacts) as items to be included in this PJR.
- Section 4 (Supporting Studies & Reports) summarizes the reports and studies submitted in support of the development applications.
- Section 5 (Planning Policy Review & Analysis) reviews and discusses the proposed development with respect to its consistency with the Provincial Planning Statement, 2024 (“PPS 2024”) and its conformity with the Township’s Official Plan (which, under s. 70.13 of the *Planning Act*, includes the former Region of Waterloo Official Plan).
- Section 6 (Summary & Conclusion) summarizes and reviews the key points made throughout this PJR.

There are five appendices to this PJR, identified using the letters “A” through “E”. As noted above, Appendices A–C contain draft versions of the proposed Official Plan Amendment, Zoning By-law Amendment, and Draft Plan modifications, while **Appendix “D”** contains information related to the Financial Impact Statement in Section 3.4 of the PJR and **Appendix “E”** contains relevant policies from the PPS 2024 discussed in Section 5.

This PJR has been prepared without the use of generative AI.

2. Planning Applications

2.1 Proposed Development

The applications submitted propose to develop the Subject Lands for a mix of residential and commercial land uses, as well as a public park and a stormwater management (“SWM”) facility (the “Proposed Development”). Approximately 43% of the Subject Lands (18.66 hectares out of a total area of 43.07 hectares) is to remain undeveloped in order to preserve existing wetland features and associated buffers.

The proposed residential uses will consist of a mix of single detached dwellings, townhouse dwellings, and apartment dwelling units. Based on the proposed zoning (see Section 2.3 below), it is anticipated that the number of single detached dwellings will be in the range of 195–267 units. The proposed townhouse units will comprise 36–43 street townhouse units on two “Street Townhouse” blocks, 52 stacked townhouses on one “Medium Density” block, and another 88 back-to-back townhouse units on two “Mixed-Use Commercial” blocks (44 back-to-back units on each block). Each Mixed-Use Commercial block will also contain two four-storey mixed-use buildings, providing a combined total of 174 apartment units (90 units on one block and 84 units on the other) and a total 1,400 m² of commercial space (800 m² on one block and 600 m² on the other). The development concept plan in **Figure 8** illustrates the proposed layout of the “Medium-Density” and “Mixed-Use Commercial” blocks.

Table 2 (on p. 16, after Figure 8) identifies the proposed land uses and the area occupied by each proposed use. The land uses in Table 2 are presented in two categories: “Developable Area,” which encompasses the uses that are to be included in the calculation of gross residential density, according to the definition in Section 7.26.5.6 of the Township’s Official Plan,³ and “Non-developable Area,” which comprises the wetland blocks and their associated “Greenland Setback” blocks, as well as one road widening block (which is to be excluded from the calculation of gross residential density according to the definition in Section 7.26.5.6).

³ “‘Gross Residential Hectare’ means the area of land, measured in hectares, utilized for residential dwelling units including the lot areas, local residential streets, local parks including walkways and bicycle ways, public and separate elementary schools, places of worship and other institutions such as day care centres and nursing homes, convenience commercial facilities and local municipal facilities such as hydro substations. This area excludes boundary roads (defined herein to mean roads forming the boundary of a residential area) and widenings, lands within the Environmental Protection designation and other major existing uses unrelated to the community such as cemeteries” (Township of Woolwich Official Plan, Section 7.26.5.6.a).

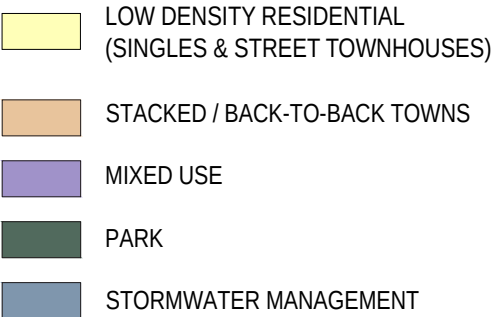


Table 2 – Proposed Land Uses

Developable Area		Non-developable Area	
Land Use Description	Area [ha]	Land Use Description	Area [ha]
Single Detached	10.25	Wetland	16.43
Street Townhouses	0.83	Greenland Setback	1.65
Medium-Density Residential	1.03	Road Widening	0.08
Mixed-Use Commercial	4.70		
Park	1.22		
Open Space	0.24		
Stormwater Management	1.70		
Roads	4.94		
Gross Developable Area	24.91	Non-Developable Area	18.16
		Total Area	43.07

As indicated in Table 2, the residential, mixed-use, and other development blocks all combined occupy a gross residential area of approximately 24.91 hectares (again, using the Official Plan definition of “gross residential hectare”). Overall, the proposed range of 545–624 total dwelling units (195–267 single detached units plus 176–183 townhouse and 174 apartment units) corresponds to a gross residential density of approximately 21.9–25.1 units per hectare.

Development proposed on the Medium-Density Residential block will have a density of approximately 50.5 units per net hectare (52 units on 1.03 hectares). Net hectares has been used in this calculation because this block is separated from the park, open space, and other blocks by the large wetland feature. As requested by the Township through the Pre-application Consultation Comments, the density calculations presented in the remainder of this section will consider the developable area east of the large wetland (the “Easterly Portion”) separately from Block 52.

The developable non-residential area (meaning the area occupied by the Park, Open Space, and SWM blocks, plus the roads) is 8.10 hectares. To calculate gross residential

density for the Easterly Portion of the Proposed Development, it will be necessary to “allocate” this area between the low-density (*i.e.*, single detached) blocks and the medium-density (street townhouse and mixed-use commercial) blocks. Allocating on a per-unit basis, the low end of the unit range (493 units: 195 single detached units and 298 medium-density units) gives a gross residential density of approximately 14.5 units/ha for the single detached dwellings and 25.3 units/ha for the medium-density forms, while the high end of the range (572 units: 267 single detached and 305 medium-density) gives 19.0 units/ha for the single dwellings and 31.0 units/ha for the medium-density units. **Table 3** shows how these densities were calculated.

The Township's Official Plan directs that low-density residential development (single detached and semi-detached dwellings) “may be developed to a residential density ranging between 12 to 20 units per gross residential hectare” (No. 7.5.1.1.a), while medium-density residential development is to achieve “a density between 20 and 50 units per gross residential hectare” (No. 7.5.1.2.a) and high-density residential uses “a density between 50 and 120 units per net residential hectare” (No. 7.5.1.3.a). The Proposed Development thus conforms with the density ranges contemplated in the Township's current Official Plan, with the exception of the proposed Medium Density Residential Block 52, which at 50.5 units per

Table 3 – Calculation of Gross Residential Density

	[1]	[2]	[3]	[4]	[5]	[6]
Land Use	No. of units	Share of units	Allocation of non-resid'l area	Area occupied by blocks	Gross resid'l area	Gross resid'l density
<i>Low end of unit range</i>						
Single Detached	195	39.6%	3.20 ha	10.25 ha	13.45 ha	14.5 units/ha
Townhouse & Mixed-Use	298	60.4%	4.90 ha	5.53 ha	1.42 ha	25.3 units/ha
<i>High end of unit range</i>						
Single Detached	267	46.7%	3.78 ha	10.25 ha	14.03 ha	19.0 units/ha
Townhouse & Mixed-Use	305	53.3%	4.32 ha	5.53 ha	9.85 ha	31.0 units/ha

[1] as shown on modified draft plan of subdivision

[2] = [1] / (sum of values in [1])

[3] = [2] × 8.10 ha (developable non-residential area)

[4] as shown on modified draft plan of subdivision

[5] = [3] + [4]

[6] = [1] / [5]

Table 4 – Expected Population of Proposed Development

Unit type	No. of units	PPU ^(a)	Expected no. of residents ^(a)
Single Detached	195–267	3.25	634–868
Street Townhouse	36–43	2.44	88–105
Stacked Townhouse (Block 52)	52	2.11	110
Back-to-Back Townhouse (Blocks 55 & 56)	88	2.11	186
Apartment	174	1.77	308
Total	545–624	--	1,326–1,577

^(a)Person per unit (PPU) values taken from the Region of Waterloo's *2025 Water and Wastewater Monitoring Report* (June 2025), p. 7.

^(b)All values have been rounded up to the nearest whole number.

hectare slightly exceeds the maximum density stated in No. 7.5.1.2.a. This small exceedance is addressed through a minor amendment proposed to the wording of existing site-specific provisions in No. 7.26.10.1 b), to allow both low-density and medium-density uses on specific sites to exceed the specified net density ranges, subject to certain conditions.

The proposed number of dwelling units has been converted into expected population using the person-per-unit values from the Region of Waterloo's *2025 Water and Wastewater Monitoring Report*, as shown in **Table 4** above. Including the Medium Density Residential Block 52, the Proposed Development is expected to accommodate a total population of 1,326–1,577 people. Without including Block 52, the expected population of the Easterly Portion is 1,216–1,467 people.

According to data from the 2021 Census of Population, the number of people in Breslau working at home represented approximately 28.5% of the employed labour force (720 people working at home out of 2,530 people in the employed labour force).⁴ The employed labour force represented 70.1% of the population aged 15 years or older (2,530 out of 3,610

⁴ Census data from Statistics Canada, 2021 Census of Population, Census Profile: Breslau (MDP). Statistics Canada classifies Breslau as a "Municipal defined place" ("MDP"), a sub-category of the "Designated place" ("DPL") category created to provide data for sub-municipal geographies. Because the discussion here focuses on rates and percentages, the population numbers cited here have not been adjusted for net Census undercoverage.

people), which in turn comprised 71.4% of Breslau's total population in 2021 (3,610 out of 5,053 people). This means that the number of people working at home in Breslau in 2021 was approximately 14.25% of the total population.

The 2021 Census was conducted in the midst of the COVID-19 pandemic, at which time there were more people than usual working at home. According to research conducted by Statistics Canada since the 2021 Census, the percentage of workers nationally working most of their hours from home declined from 30.6% in May 2021 (when the Census was conducted) to a relatively stable rate of about 20% towards the end of 2023.⁵ If we assume, based on this research, that the present-day work-at-home rate is about two-thirds of the rate reported in the 2021 Census, then we would expect the adjusted present-day rate to be approximately 19.0% of the employed labour force in Breslau (480 out of 3,610 people), or approximately 9.50% of the total population. Applying this rate to the expected number of residents, we estimate there would be approximately 126–150 people living in the Proposed Development who work at home, or approximately 116–140 people working at home for the Easterly Portion (*i.e.*, not including Block 52).

As for anticipated commercial employment, the 2024 Development Charges Background Study prepared for the Township by Watson & Associates Economists Ltd. ("Watson") assumes a rate of 500 square feet per employee for its commercial and population-related employment forecasts,⁶ or approximately 46.45 m² per employee. The Proposed Development includes a total of 1,400 m² of proposed commercial floor space, which therefore corresponds to an expected 31 commercial jobs (rounding up to the nearest whole number).

Taken together, the Proposed Development is expected to accommodate 1,326–1,577 people, 126–150 work-at-home jobs, and 31 commercial jobs on a gross developable area of 24.91 hectares, which corresponds to an overall density of approximately 59.5–70.6 people and jobs (combined) per hectare. Not including Block 52, the Easterly Portion is expected to accommodate 1,216–1,467 people, 116–140 work-at-home jobs, and 31 commercial jobs on 23.88 hectares, for a density of **approximately 57.1–68.6 people and**

⁵ Statistics Canada, *Research to Insights: Working from home in Canada* (January 18, 2024), <https://www150.statcan.gc.ca/n1/pub/11-631-x/11-631-x2024001-eng.htm>. See in particular Chart 1 and the accompanying data table.

⁶ Watson & Associates Economists Ltd., *2024 Development Charges Background Study: Township of Woolwich* (see Note 1 on Schedule 8b in Appendix A), available at <https://www.woolwich.ca/build-invest/development-charges/>.

jobs (combined) per hectare. The lower range of this anticipated density exceeds the minimum target of 55 people and jobs per hectare established by the Township.

Three development applications have been submitted to facilitate the Proposed Development as described in this section: an application for modifications to the existing approved Draft Plan of Subdivision (discussed in Section 2.2 below), an application to amend the Township’s Zoning By-law (discussed in Section 2.3), and an application requesting an Official Plan Amendment (discussed in Section 2.4).

2.2 Draft Plan Modifications

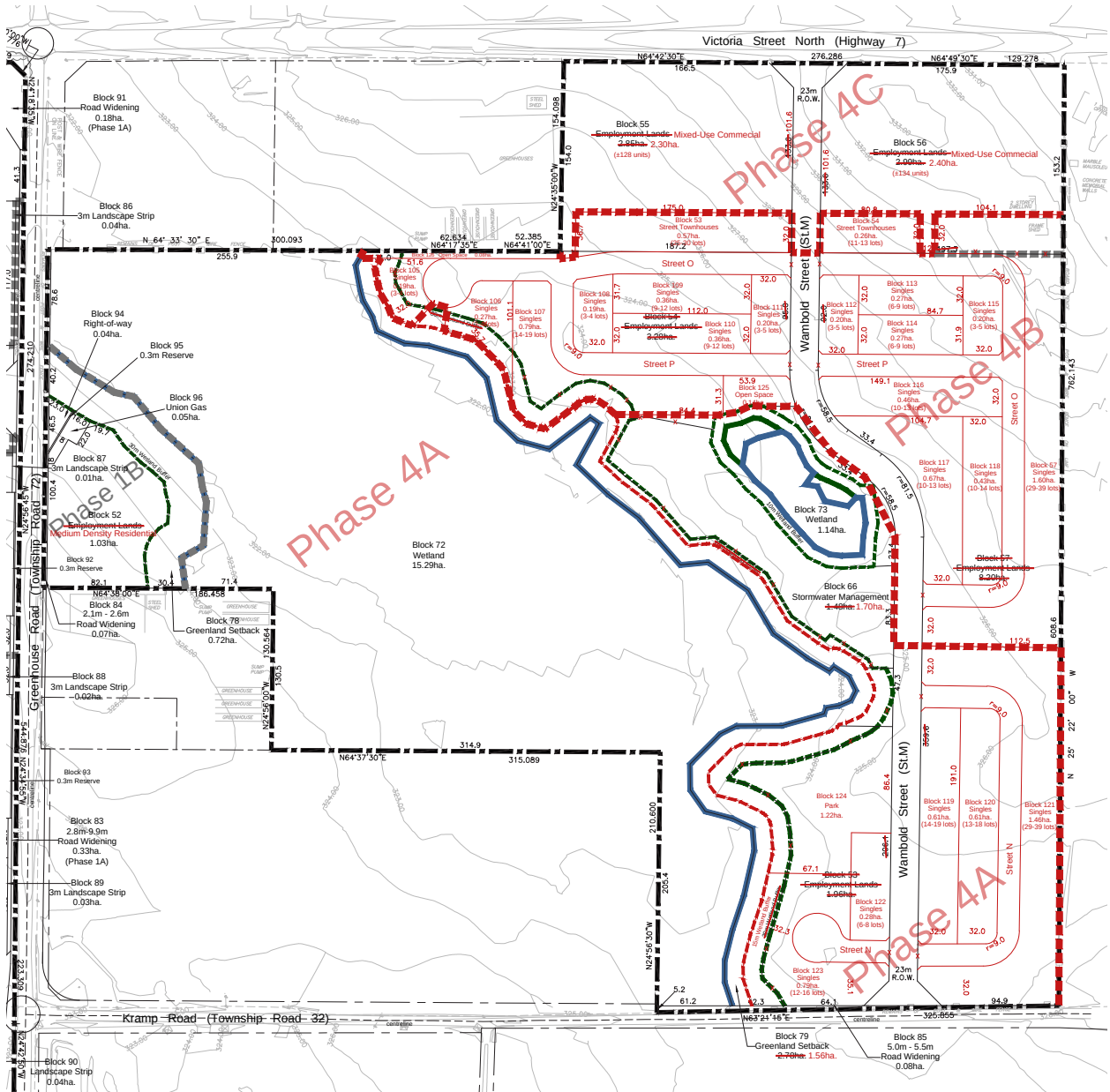
The modifications being requested to the currently approved version of Draft Plan of Subdivision 30T-11701 involve revisions to the Draft Plan itself, as well as associated changes to the conditions of draft approval. Once they have been confirmed with the Township, the requested modifications will be presented to the OLT for approval pursuant to subs. 51 (56.2) of the *Planning Act*.

2.2.1 Modifications to Draft Plan

The proposed modifications to the Draft Plan itself are shown in **Figure 9**, in the form of “red-line” modifications. In general terms, these involve proposed changes to the current Land Use Descriptions, adjustments to the boundaries of Greenland Setback Block 79 (which align with the recommendations of the scoped EIS submitted with these applications: see Section 4.1 below), and the creation of new development blocks and road rights-of-way from existing blocks on the Draft Plan.

Because the modifications shown in Figure 9 are rather complex, particularly as they relate to adjustments made to the block boundaries, **Figure 10** on the page following provides a schematic representation of the proposed modifications in terms of the land use descriptions. As illustrated in Figure 10, the most significant modifications involve the replacement of the “Employment Land” blocks with the residential, mixed-use, and park blocks, with the accompanying creation of additional roads on the Draft Plan. In addition, the size of the Stormwater Management block (Block 66) has been slightly increased, and the area of Greenland Setback Block 79 reduced. The two “Wetland” blocks (Blocks 72 and 73) and the “Road Widening” Block 85 are not affected by the proposed modifications.

Table 5 on p. 23, after Figure 10, provides a simplified summary of the proposed modifications as they relate to the Proposed Development. It should be noted that that numbers in the “Proposed Area” column of Table 5 do not necessarily add up to the same totals as those in the “Current Area” column, because of the adjustments to the Greenland Setback boundaries and the creation of new roads.

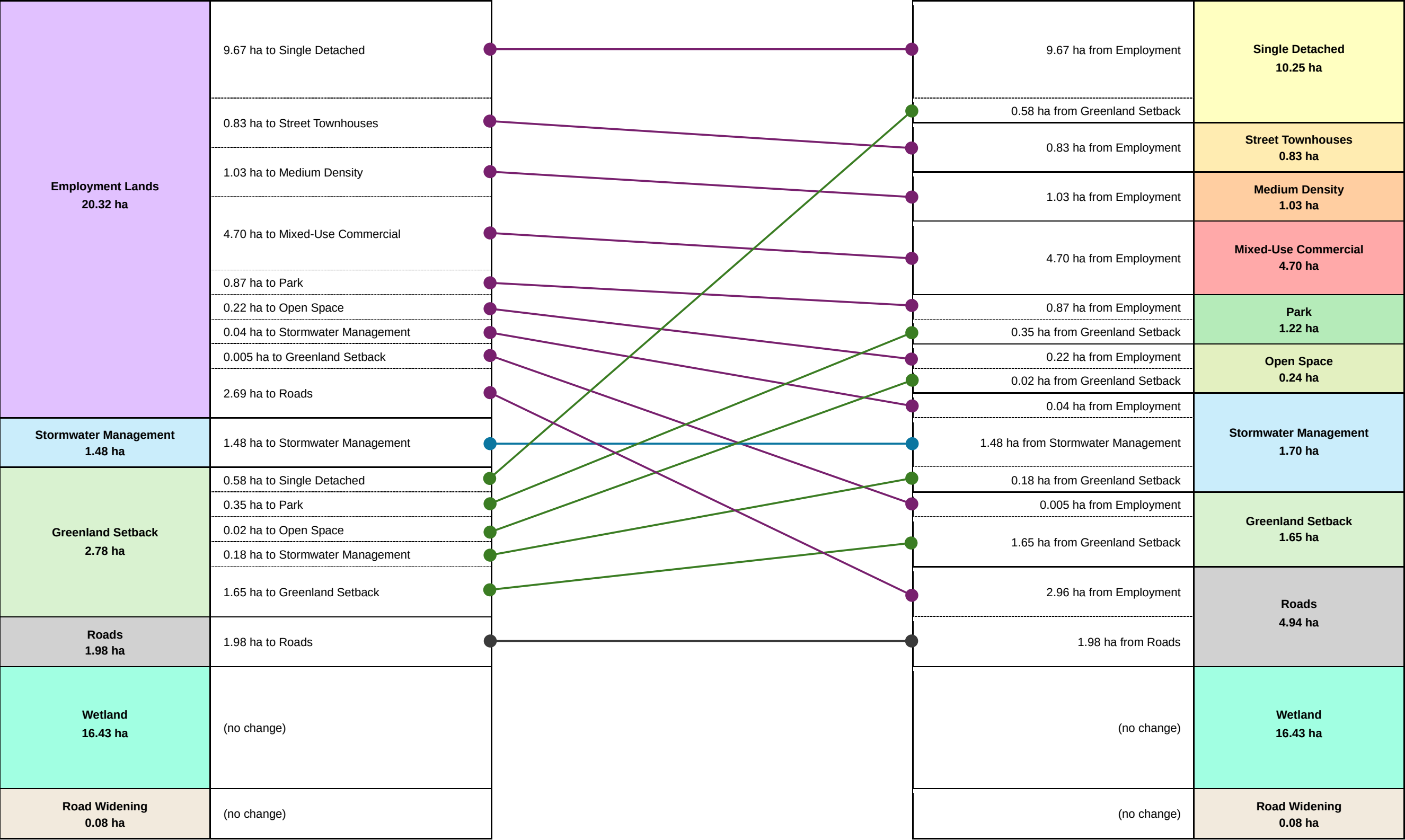


Proposed Red-Line Modifications to Draft Plan

Source: GSP Group (2026)

Figure

9



Schematic Representation of Draft Plan Modifications

Source: GSP Group (2026)

Figure 10



Table 5 – Summary of Proposed Draft Plan Modifications

Block No.^(a)	Current Land Use Description^(a)	Current Area^(a)	Proposed Development	Proposed Area
52	Employment Lands	1.03 ha	Residential (Block 52): 52 stacked townhouse units	1.03 ha
53	Employment Lands	1.96 ha	Residential (Blocks 122 & 123): 18–24 single detached units	1.07 ha
			Park (Block 124): 1.22 ha	1.22 ha
54	Employment Lands	3.28 ha	Residential (Blocks 105–111): 44–60 single detached units	2.40 ha
			Open Space (Blocks 125 & 126)	0.24 ha
55	Employment Lands	2.85 ha	Residential (Block 53): 25–30 street townhouse units	0.57 ha
			Mixed-Use Commercial (Block 55): 44 back-to-back townhouse units, 84 apartment units & 600 m ² of commercial space	2.30 ha
56	Employment Lands	2.99 ha	Residential (Block 54): 11–13 street townhouse units	0.26 ha
			Mixed-Use Commercial: 44 back-to-back townhouse units, 90 apartment units & 800 m ² of commercial space	2.40 ha
57	Employment Lands	8.20 ha	Residential (Blocks 57 & 112–121): 133–183 single detached units	6.78 ha
66	Stormwater Management	1.48 ha	Stormwater management facility	1.70 ha
72	Wetland	15.29 ha	No development proposed	15.29 ha
73	Wetland	1.14 ha	No development proposed	1.14 ha
79	Greenland Setback	2.78 ha	No development proposed	1.65 ha

^(a)As shown on currently approved version of Draft Plan of Subdivision 30T-11701.

2.2.2 Modifications to Conditions of Draft Approval

The conditions of draft approval for Draft Plan 30T-11701 were approved by the Ontario Municipal Board (now the Ontario Land Tribunal) in May 2016 and subsequently amended by the OMB in April 2018 and, most recently, by the OLT on May 1, 2026 (see Section 1.2 above for details). Further modifications are now being requested in connection with the modifications to the Draft Plan itself, described above.

The requested modifications pertain primarily to changes in the land use descriptions of the employment blocks. **Table 6** on the following page identifies the conditions affected by the proposed changes, as well as the reason for each modification, which generally fall under the following categories:

- **Changes to land use descriptions.** As noted above, the majority of the requested modifications fall under this category. This includes modifications that provide for the conveyance of the new Park Block 124.
- **Creation of new blocks.** The list of blocks in Township Condition No. 1 has been updated to reflect the blocks created through the requested modifications.
- **Addition of new streets.** This category encompasses conditions that address public road allowances and right-of-way widths, as well as street names.
- **Creation of additional dwelling units.** The increase in the number of dwelling units requires changes to conditions that relate to the phasing of development.
- **Sub-phasing of Phase 4 and incorporation of residential blocks.** The current Draft Plan does not place the employment blocks in any particular phase, in order to allow for the development of these blocks independent of the residential phases of the subdivision. The conversion of the employment blocks to residential uses requires that they be included as part of Phase 4. Phase 4 has also been divided into sub-phases (4A, 4B, and 4C) in order to provide for the development of certain blocks before jurisdiction over Victoria Street North (Highway 7) has been transferred from MTO to the Region.

A “tracked-changes” version of the requested modifications is provided in Appendix “C” to this report. Conditions that are not affected by the modifications have been omitted from the appendix.

Township Condition No. 4.B.1 states that wastewater capacity equivalent to 2,490 people has been allocated for the Hopewell Crossing subdivision at the Breslau Sanitary Pumping Station located next to the City of Kitchener’s Victoria Street Sanitary Pumping Station.

Table 6 – Summary of Modifications to Conditions of Draft Approval

Condition	Purpose / Effect of Condition	Reason for Modification
<i>Township Conditions</i>		
No. 1	Identifies land uses for each block on Draft Plan along with number of dwelling units (for residential blocks) or area (for other blocks).	Creation of new blocks. Changes to land use descriptions, number of dwelling units, and areas of blocks.
No. 3	Identifies public road allowances on Draft Plan and provides for naming and dedication of public streets.	Addition of new streets.
No. 4.A.3	Establishes right-of-way widths and other specifications for public streets.	Addition of new streets.
No. 4.A.4	Provides for external road improvements as part of the primary services for certain phases.	Sub-phasing of Phase 4.
No. 4.A.15	Requires the extension of sanitary trunk sewer via Kramp Road to Wambold Street as part of primary services of Phase 4.	Sub-phasing of Phase 4.
No. 4.A.22	Establishes requirements for implementation of groundwater monitoring program.	Incorporation of residential blocks into Phase 4.
No. 4.A.23	Establishes specifications for the construction of stormwater management facilities.	Sub-phasing of Phase 4.
No. 4.A.30	Requires installation of landscaping and plantings within certain blocks.	Sub-phasing of Phase 4.
No. 4.B.2	Addresses wastewater capacity for Phases 1–4 of the Draft Plan as originally approved.	Creation of additional dwelling units (and corresponding increase in expected number of residents).
No. 4.B.3	Provides for phasing of population growth associated with residential development in three-year increments.	Creation of additional dwelling units (and corresponding increase in expected number of residents).
No. 4.B.5	Provides for sequential phasing of development.	Sub-phasing of Phase 4.
No. 4.B.6	Establishes requirements for registration and development of Phase 4.	Sub-phasing of Phase 4 and incorporation of residential blocks.
No. 4.B.7	Provides for servicing and registration of Employment Land blocks.	Changes to land uses.
No. 4.B.10	Provides for construction and conveyance of stormwater management blocks in conjunction with phases of development.	Sub-phasing of Phase 4 and incorporation of residential blocks.

Table 6 – Summary of Modifications to Conditions of Draft Approval (continued)

Condition	Purpose / Effect of Condition	Reason for Modification
<i>Township Conditions (continued)</i>		
No. 4.B.11	Provides for the timing of external road improvements with respect to development phases.	Sub-phasing of Phase 4.
No. 4.B.18	Provides for development of townhouses on certain blocks.	Changes to land uses (creation of townhouse blocks).
No. 4.B.19	Provides for development of mixed-use townhouses on certain blocks.	Sub-phasing of Phase 4.
No. 4.B.20	Provides for medium-density and high-density residential development on certain blocks.	Changes to land uses (creation of medium-density block).
No. 4.B.21	Provides for mixed-use commercial development on certain blocks.	Changes to land uses (creation of mixed-use commercial blocks).
No. 4.B.22.iii	Addresses timing of conveyance of Greenhouse Road Extension (Block 82) and Future Connector Road (Blocks 102 & 103).	Sub-phasing of Phase 4.
No. 4.B.24.ii.b	Defines circumstances in which Subdivider must provide financial contribution for construction of Future Connector Road.	Sub-phasing of Phase 4.
No. 4.C.1.i	Provides for conveyance of stormwater management blocks in conjunction with certain phases of development.	Sub-phasing of Phase 4 and incorporation of residential blocks.
No. 4.C.1.iii	Provides for conveyance of park blocks.	Changes to land uses (creation of park block).
No. 4.C.1.iv	Provides for conveyance of open space blocks.	Changes to land uses (creation of open space blocks), sub-phasing of Phase 4 and incorporation of residential blocks.
No. 4.C.1.vii	Provides for conveyance of landscaping blocks.	Sub-phasing of Phase 4.
No. 4.C.1.ix	Provides for conveyance of Block 85 for road widening in conjunction with certain phases of development.	Sub-phasing of Phase 4 and incorporation of residential blocks.
No. 4.D.1	Sets out requirements for development of park blocks.	Changes to land uses (creation of park block).
No. 4.D.6	Establishes requirements relating to residential lots/blocks that abut open space areas.	Changes to land uses (creation of residential and open space blocks).

Table 6 – Summary of Modifications to Conditions of Draft Approval (continued)

Condition	Purpose / Effect of Condition	Reason for Modification
<i>Township Conditions (continued)</i>		
No. 4.G.1	Makes commercial, mixed-use commercial, and employment land development subject to Site Plan Control.	Changes to land uses (creation of mixed-use commercial blocks and conversion of employment blocks).
No. 4.G.2	Requires completion of noise study to address potential impacts from employment blocks on residential uses.	Changes to land uses (conversion of employment blocks).
No. 4.G.3	Provides for on-site water pumping station for employment land development on Blocks 53–57.	Changes to land uses (conversion of employment blocks).
No. 4.I.1.x	Establishes requirements for outdoor lighting on certain blocks that abut natural features.	Changes to land uses (creation of medium-density block and conversion of employment blocks).
No. 9.v	Establishes requirements for hydrogeological monitoring program.	Incorporation of residential blocks into Phase 4.
No. 27	Provides for appropriate timing of conveyance of Greenhouse Road Extension (Block 82) and Future Connector Road (Blocks 102 & 103).	Sub-phasing of Phase 4.
<i>Region Conditions</i>		
No. 18.b	Requires temporary emergency access if more than 26 units are developed with one point of access due to phasing.	Incorporation of residential blocks into Phase 4 (regarding emergency access from Victoria Street North, if still under MTO jurisdiction).
No. 36	Requires Salt Management Plan for employment blocks.	Changes to land uses (conversion of employment blocks).
No. 37	Requires Noise Study to assess impacts from traffic on abutting and internal streets prior to each residential phase.	Changes to land uses (creation of residential blocks along Wambold Street) and incorporation of residential blocks into Phase 4.
No. 42	Requires Traffic Noise Study to assess impacts on residential development along Victoria Street North.	Changes to land uses (creation of mixed-use commercial blocks along Victoria Street North) and sub-phasing of Phase 4.
No. 49.a	Requires Transportation Impact Study Addendum prior to each residential phase.	Changes to land uses (creation of residential blocks) and incorporation of residential blocks into Phase 4.
No. 50	Establishes requirements for submission of TIS Addendum to Region and obtaining of Regional Road Access Permit.	Sub-phasing of Phase 4.

Condition No. 4.B.1 further clarifies that “no specific sewage allocation is required to be reserved for the non-residential (i.e. school, parks, employment, commercial and GO station) uses within the Thomasfield Homes Development as these flows are incorporated in the population flow of 2490 people.” The proposed modifications do not affect Condition No. 4.B.1. Instead, a modification is proposed to Township Condition No. 4.B.2, to allow for sanitary capacity beyond 2,490 people to be allocated to the Hopewell Crossing subdivision, subject to receiving confirmation from the Township that capacity indeed exists at the Breslau Sanitary Pumping Station.

Another condition that is not affected by the proposed modifications is Region Condition No. 53.a), which requires the developer to enter into a servicing agreement with the Region “to preserve access to municipal water supply and municipal wastewater treatment services prior to final approval or any agreement for the installation of underground services, whichever occurs first.” Condition 53.a) further provides that “the Regional Commissioner of Transportation and Environmental Services shall advise prior to an Agreement for Servicing that sufficient water supplies and wastewater treatment capacity is available for this plan, or the portion of the plan to be registered.”

This report calls attention to Region Condition No. 53.a) because of Staff Report EES-WAS-26-001, which was presented to the Region’s Sustainability, Infrastructure, and Development Committee on January 13, 2026, regarding water capacity constraints in the Mannheim Service Area, a large area that includes the Subject Lands. This existing condition means that the decision to approve the development applications discussed in this report will not require the allocation of new water capacity until the applicable phases of the Draft Plan are registered. In other words, the applications can be approved without exacerbating the Region’s current water supply capacity issues.

2.3 Zoning By-law Amendment

As shown in Figure 5 above, the Subject Lands are currently zoned a combination of “EM-5” (Blocks 53, 54, and 57), “EM-6” (Blocks 52, 55, and 56), and “O-2” (Blocks 66, 72, 73, 78, and 79). Section 2.9.1 of the Zoning By-law establishes that the purpose of the “EM-5” zone is “to accommodate heavy industrial and business-park type uses with limited commercial on full municipal services,” while the “EM-6” zone is intended “to accommodate prestigious business-park and light industrial uses with an increased range of commercial uses.” The “O-2” zone is meant “to protect core environmental features.”

The blocks in the “EM-6” zone are further subject to site-specific provisions set out in Section 16.233 of the Zoning By-law. As they currently apply to the Subject Lands, those site-specific provisions:

- require a minimum setback from Victoria Street North of 14 metres (if under the jurisdiction of the Province) or a minimum setback of 6 metres (if under the Region’s jurisdiction);
- permit the development of a free-standing restaurant (including drive-thru) on Block 52, subject to the applicable regulations in Sections 4, 5, 10, and 16 of the By-law;
- permit the development of a retail hardware store in association with a building supply centre on Block 55, subject to the applicable regulations in Sections 4, 5, 10, and 16 of the By-law; and
- apply a holding symbol with conditions that require the submission of “a detailed traffic and/or noise study that assesses noise impacts from surrounding industries and/or roads” along with written confirmation that any required mitigation measures will be implemented before the holding symbol may be removed, following which the development of a day-care centre/school on Blocks 52, 55, or 56 may be permitted.

References to block numbers in the list above are to the numbering as it appeared on the Draft Plan before the modifications described in Section 2.2 above.

The proposed Zoning By-law Amendment (“ZBA”), included as Appendix “B” to this report, will maintain the site-specific setback provisions with respect to Victoria Street North. An existing holding provision, which imposes conditions for the development of a day-care centre/school, has been modified to reflect the change in designation and expanded to apply to the development of residential or other sensitive uses, based on the findings of the Noise Feasibility Study (see Section 4.7 below). A similar holding provision applies to residential development on Block 52. The existing site-specific provisions permitting a free-standing restaurant on Block 52 (No. 16.233.B.a) and permitting a retail hardware store in association with a building supply centre (No. 16.233.B.b) will be repealed.

The proposed ZBA will establish the following zones, with reference to block numbers on the modified Draft Plan (Figure 9):

- “R-5A” for the single detached dwellings on Blocks 57 and 105–123;
- “R-6A” for the street townhouses on Blocks 53 and 54;
- “R-6A (H1)” for the stacked townhouses on Block 52;
- “MU-2 (H2)” for Blocks 55 and 56; and
- “O-1” for Park Block 124 and for Open Space Blocks 125 and 126.

Stormwater Management Block 66, Wetland Blocks 72 and 73, and Greenland Setback Block 79 will retain their current “O-2” zoning, although the boundaries of that zone will be adjusted to match the modified boundaries of Block 66 and Block 79.

The “(H1)” holding symbol applied to Block 52 will require confirmation of sufficient water supply capacity from the Region of Waterloo before residential development on that block may proceed. This holding provision has been applied because Block 52 has already been registered as part of Phase 1B, meaning that all existing conditions of draft approval pertaining to that block have been satisfied, as confirmed through the registration process. In other words, Block 52 has already received final approval under subs. 51 (58) of the *Planning Act* and is thus no longer subject to any conditions of draft approval imposed under subs. 51 (25).

The “(H2)” symbol applied to Blocks 55 and 56 imposes conditions regarding the development of a day-care centre/school, as discussed above.

2.3.1 Residential Zones (R-5A & R-6A)

According to Section 7.1 of Zoning By-law No. 26-2024, the “R-4” and “R-5” zones are intended as “medium density zones with a broader range of housing types” that “shall generally maintain a density of 20 to 50 units per gross residential hectare.” The table in Section 7.2 of the Zoning By-law indicates that single detached dwellings are permitted in the “R-5” zone.

Section 2.9.1 of the Zoning By-law explains that the primary purpose of the “R-6” zone is “to accommodate medium to high density housing on full municipal services.” Section 7.1 states that development in this zone “shall generally maintain a density of 50 units per net residential hectare or greater recognizing that certain housing types (e.g., townhouses) may be less.” According to the table in Section 7.2, both “Townhouse Row” and “Townhouse Stacked” are permitted uses in the “R-6” zone.

Table 7 on the following page shows the applicable regulations from Zoning By-law No. 26-2024 for single detached dwellings with municipal services in the “R-5” zone and for townhouse (row) dwellings with municipal services in the “R-6” zone. For the purposes of this discussion, the most pertinent of those requirements relate to minimum lot area and minimum lot frontage. As noted in Section 2.1 above, the proposed development will contain an estimated 195–267 single detached dwellings. The high end of that estimated range was determined by assuming a minimum corner lot width of 12.19 metres (40 feet) and a minimum interior lot width of 9.14 metres (30 feet), both of which comply with the minimum requirements in the “R-5” zone (8 metres for interior lots and 10 metres for corner lots).

Table 7 – Applicable Zoning Requirements for R-5 & R-6 Zones

Regulation / Requirement	R-5 Single Dwelling with Services	R-6 Townhouse (Row) with Services
Minimum Lot Area	220 m ²	150 m ²
Minimum Lot Width – Interior	8 m	N/A
Minimum Lot Width – Corner	10 m	N/A
Minimum Building Line Setback – Front Wall	3.5 m	3.5 m
Attached 1- / 2-Car Garage, Lot Width ≥ 11 m	6 m	6 m
Attached 1-Car Garage, Lot Width < 11 m	9 m	9 m
Minimum Building Line Setback – Flankage	3.5 m	3.5 m
Minimum Side Yard Setback – Interior Lot Line	0.6 m ^(a)	1.5 m
Minimum Side Yard Setback – Shared	N/A	0 m along common wall between units
Minimum Rear Yard Setback	7 m	7 m
Minimum Ground Floor Area	70 m ² (1 storey) 50 m ² (>1 storey)	60 m ² (1 storey) 50 m ² (>1 storey)
Maximum Main Building Height	10.5 m	12.5 m
Maximum Lot Coverage	60%	60%
Maximum Net Density	50 units / ha	120 units / ha
Minimum Outdoor Amenity Area	56 m ²	30 m ²
Landscaped Area – Front Yard ^(b)	Minimum width: 30% (continuous) of lot width Minimum area: 30% of entire area of front yard	
Maximum Driveway Width ^(c)	3.66 m (frontage < 10 m) 6 m (frontage ≥ 10 m) OR 60% of lot width	3.66 m OR 60% of lot width
Minimum Parking Requirement ^(d)	1 space / unit	1 space / unit
Maximum Impervious Coverage	80%	80%

Note: Requirements are from Section 7.3 of Zoning By-law No. 26-2024 unless otherwise indicated.

^(a) Provided that total distance to abutting residential unit is not less than 1.8 m.

^(b) Per Section 4.27 of Zoning By-law No. 26-2024. ^(c) Per Section 5.7.b). ^(d) Per Section 5.2.e).

Using those minimum assumptions combined with the block dimensions on the modified Draft Plan, the estimated interior lot areas are generally in the range of 300–500 m² and estimated corner lot areas 390–650 m², both of which comply with the minimum of 220 m² required in the “R-5” zone.

Furthermore, Township Condition No. 2 requires that a lotting scheme be provided with the Final Plan to be registered “for the purpose of confirming housing types, lot sizes and compliance to the applicable minimum lot requirements in the Township Zoning By-law.” That condition is not affected by the requested modifications described in Section 2.2 above.

With respect to density, it is acknowledged that Section 7.1 of the Zoning By-law states that development in the “R-5” zone “shall generally maintain a density of 20 to 50 units per gross residential hectare,” whereas the estimated gross density for the proposed single detached dwellings is 14.5–19.0 units per gross hectare (see Table 3 on p. 17). In terms of net density, the estimated range for the propose single detached dwellings is 19.0–26.0 units per net hectare. However, given that Section 7.1 uses the phrase “shall *generally* maintain” (emphasis added), combined with the fact that there is no minimum density requirement set out in Section 7.2 and with the fact that the single detached dwellings will comply with all applicable requirements in that section, it has been determined that no site-specific provision is needed to address the statement in Section 7.1 regarding general densities.

For the two street townhouse blocks, it is estimated that each unit will have a lot area of approximately 180–200 m² for interior units and 250–270 m² for end units, which complies with the minimum requirement for the “R-6” zone. There is no minimum lot width requirement for townhouses in the “R-6” zone. Based on the proposed range of 36–43 townhouse units, the estimated net density for Blocks 53 and 54 is approximately 43.4–51.8 units per net hectare, which is less than the maximum of 120 units per hectare established in Section 7.2 of the Zoning By-law and which is consistent with the statement regarding densities in this zone in Section 7.1.

Table 8 below presents the applicable requirements regarding the stacked townhouses proposed on Block 52, which are also to be zoned “R-6”. Block 52 has an area of approximately 1.03 hectares (10,300 m²) and approximately 100.4 metres of frontage along Greenhouse Road, both of which are greater than the minimum required under Section 7.8 of the Zoning By-law. The development of this block, to be confirmed through a future Site Plan Application, will comply with all other applicable zoning regulations.

Table 8 – Zoning Requirements for Stacked Townhouses in R-6 Zone

Regulation / Requirement	Stacked Townhouse in R-6
Minimum Lot Area	700 m ²
Minimum Lot Width	20 m
Minimum Building Line & Flankage Setbacks:	
Front Wall of Unit	3.5 m
Flankage	3.5 m
Front Wall of One-Car Garage	9 m
Front Wall of Two-Car Garage	6 m
Front Wall of Porch	2.0 m
Minimum Side Yard	1.8 m (interior), 0 m (shared)
Minimum Rear Yard	7.0 m
Minimum Floor Area Per Dwelling Unit	17.5 m ²
Minimum Amenity Area	30 m ² / unit
Maximum Lot Coverage	60%
Maximum Building Height	4 storeys or 16 m (whichever is less)
Minimum Off-Street Parking	1.1 spaces / unit
Maximum Driveway Width ^(a)	6 m OR 60% of lot width
Landscaped Area (Front Yards) ^(b)	Minimum width: 30% (continuous) of lot width Minimum area: 30% of entire front yard

Note: Requirements are from Section 7.8 of Zoning By-law No. 26-2024 unless otherwise indicated.

^(a)Per Section 5.7.b) of Zoning By-law No. 26-2024. ^(b)Per Section 4.27. Section 7.8.k) of the By-law refers to Section 4.30 (Occasional Use), which we presume to be an error.

The “A” suffix applied to the proposed “R-5” and “R-6” zoning indicates that the development will be subject to the design guideline regulations set out in Section 7.5 of the Zoning By-law. The provisions in Section 7.5 address setbacks for garages with respect to the front wall of the dwelling unit, establish regulations and requirements regarding front porches, and set out additional requirements for three-car garages and side-loaded garages.

2.3.2 Mixed Use Zone (MU-2)

The “MU-2” zone proposed for Blocks 55 and 56 is intended “to accommodate a greater range of mixed-use development with some limited retailing,” according to Section 2.9.1 of the Zoning By-law. The development concept shown in Figure 8 above (see p. 15) proposes four four-storey mixed-use buildings (two on each block) containing a combined total of 1,400 m² of commercial space (600 m² on Block 55 and 800 m² on Block 56) and 174 apartment dwelling units, as well as separate back-to-back townhouse buildings containing another 88 dwelling units (44 units on each block).

According to the table in Section 8.1 of the Zoning By-law, “Mixed-Use or Combined-Use Building” is a permitted use in the “MU-2” zone. The permitted residential uses in the “MU-2” zone, per Section 8.1.b), are “Apartment” and “Townhouse – Stacked.” Because “Townhouse – Back-to-Back”, which is defined separately in Section 3 of the Zoning By-law, is not specifically identifies as a permitted use in the “MU-2” zone, a site-specific provision is required to permit the proposed townhouse buildings on Blocks 55 and 56.

Section 8.9 of the Zoning By-law provides that stand-alone residential buildings (apartments and stacked townhouses) may be permitted in the “MU-2” zone, but only if a permitted non-residential use is developed on the same property, either in another stand-alone building or in a mixed-use building. Section 8.9.c) requires that the non-residential use be located along the street floor frontage and occupy at least 70% of that frontage, and Section 8.9.d) requires that the stand-alone residential buildings be located to the rear of the non-residential or mixed-use building. These requirements are reflected in the concept design shown in Figure 8.

The draft ZBA in Appendix “B” to this report includes site-specific provisions to permit one or more stand-alone back-to-back townhouse buildings on a property in the “MU-2” zone, subject to the same requirements in Section 8.9 as apply to other permitted stand-alone residential buildings. The draft ZBA also provides that the regulations for back-to-back townhouses in Section 7.7 of the Zoning By-law apply to stand-alone back-to-back townhouse buildings in the “MU-2” zone, which is generally consistent with how other stand-alone residential buildings are addressed in Section 8.5 of the Zoning By-law.

The requirements in Section 5.2 of the Zoning By-law require a minimum of 1.25 parking spaces per “Commercial Mixed Use – Apartment” unit and 1 parking space per “Residential Building – Townhouse Back-to-Back” unit. The proposed dwelling units on Block 55 (84 apartment and 44 townhouse units) will thus require a minimum of 149 parking spaces, and those on Block 56 (90 apartment and 44 townhouse units) a minimum of 157 parking spaces. The number of parking spaces required for the commercial uses on these blocks

will depend on the nature of the specific use or uses proposed and will therefore be determined through a future application for Site Plan Approval.

2.4 Official Plan Amendment

Schedule B to Chapter 7 of the Township's current Official Plan (see Figure 4 above) designates the Subject Lands a combination of "Employment Land I" (Blocks 52, 55, and 56), "Employment Land II" (Blocks 53, 54, and 57), "Open Space / Recreational" (Block 66), and "Environmental Protection" (Blocks 72, 73, 78, and 79). There are also site-specific policies, set out in Section 7.26.10.1 of the Official Plan, that apply to the Subject Lands.

As they pertain to the current land use designations, those site-specific policies permit "free-standing restaurants within a common site containing office and/or hotel buildings ... within the Employment I designation" (No. 7.26.10.1.f) and permit lands designated "Employment Land I" with frontage along Victoria Street North (namely, Blocks 53 and 54) to be developed "with a retail hardware store in association with an enclosed building supply centre" (No. 7.26.10.1.g).

The Official Plan Amendment ("OPA") application proposes to re-designate the Subject Lands to conform with the designations shown on the Preferred Land Use Plan for the Breslau Settlement Plan, as endorsed by Council in February 2025 (see Figure 7 above). This would entail the following changes:

- on Schedule 'A' to Chapter 7 of the Township's Official Plan, changing the portions of the Subject Lands currently designated as "Employment Areas" to "Residential Neighbourhoods";
- on Schedule 'B' to Chapter 7, changing the blocks currently designated "Employment Land I" to "Medium/High Density Residential" (except for the southeasterly corner of current Block 56, which is to be re-designated as "Low/Medium Density Residential");
- on Schedule 'B', changing the blocks currently designated "Employment Land II" to "Low/Medium Density Residential"; and
- on Schedule 'C' to Chapter 7, adding the additional roads proposed through the modifications to the Draft Plan.

In addition to these changes to the Official Plan schedules, the proposed OPA will amend certain site-specific provisions that apply to the Subject Lands, as described below.

2.4.1 Permitted Uses & Development Criteria

According to Section 7.4.2 of the Township's current Official Plan, the "Low/Medium Density Residential" designation is "intended to promote primarily low-density residential development with some opportunities to incorporate compatible medium density residential uses in appropriate locations" (No. 7.4.2.1.i), while the "Medium/High Density Residential" designation is meant "to promote primarily medium density residential development with some opportunities to incorporate compatible high-density residential uses in appropriate locations" (No. 7.4.2.2.i).

Policy No. 7.4.2.1.ii identifies "Low density residential uses," which No. 7.5.1.1.a defines as residential uses "to a residential density ranging between 12 and 20 units per gross residential hectare," among the uses permitted in the "Low/Medium Density Residential" designation. The proposed single detached dwellings, which as shown in Table 3 above will fall into this density range, are therefore permitted in the proposed designation.

Policy No. 7.4.2.2.ii states that the uses permitted in the "Medium/High Density Residential" designation include medium-density residential uses (defined in No. 7.5.1.2.a as "having a density between 20 and 50 units per gross residential hectare"), high-density residential uses (defined in No. 7.5.1.3.a as "having a density between 50 and 120 units per net residential hectare"), and mixed-use buildings. The proposed townhouses fall within the established range for medium density residential uses (see Table 3), while the two Mixed-Use Commercial blocks have a proposed density of 55.7 units per net hectare (262 total units on a combined 4.70 hectares), which conforms with the density range established for high-density residential uses. All of the proposed uses are therefore permitted in the proposed designations.

The proposed designations are subject to the policies in Section 7.26.6.4 and Section 7.26.6.5 (respectively) of the Township's Official Plan. Policies No. 7.26.6.4.c) and No. 7.26.6.5.c) address new development abutting existing residential development, and therefore do not apply to the Proposed Development. Nos. 7.26.6.4.d) and 7.26.6.5.d) both state that the use of cul-de-sacs should be minimized "except in situations where natural heritage features or existing uses or development patterns prevent through streets." The two small cul-de-sacs included in the Draft Plan modifications are needed to allow for the efficient use of available land in light of the natural heritage constraints present on the Subject Lands.

Policies No. 7.26.6.4.e) and No. 7.26.6.5.e) both state that the back-lotting of dwelling units "onto Regional or Collector Roads shall not be permitted," and that lots with direct frontage onto Regional Roads will be "discouraged and minimized." The Proposed Development has been designed to avoid back-lotting onto any roads, internal or otherwise. Development on

the two Mixed-Use Commercial blocks that have frontage along Victoria Street North (a future Regional Road) will be designed so that commercial uses in the proposed mixed-use buildings appropriately address the Regional Road, with access to be provided from Wambold Street instead of Victoria Street North. These details will be confirmed during future Site Plan Applications for these blocks.

Policies No. 7.26.6.4.f) and No. 7.26.6.5.f) both relate to the use of Site Plan Control for proposed development in the “Low/Medium Density Residential” and “Medium/High Density Residential” designations, respectively. No. 7.26.6.4.f) has been superseded by more recent amendments to Section 41 of the *Planning Act*. Development on the townhouse and Mixed-Use Commercial blocks may still be subject to Site Plan Control. No. 7.26.6.4.g) and No. 7.26.6.5.g) both related to the Urban Design + Architectural Control Guidelines in Appendix I to Chapter 7 of the Official Plan, which are addressed in Section 3.2 of this report.

Overall, the Proposed Development will comply with the permitted uses and development criteria that apply to the land use designations proposed through the OPA.

2.4.2 Site-Specific Provisions

The re-designation of the Subject Lands, as proposed at the start of this section, means that they would be subject to the following site-specific provisions in Section 7.26.10.1 of the Official Plan:

- No. 7.26.10.1.a), which sets out staging requirements for residential development in three-year increments (though these requirements do not apply to high-density residential apartment units or mixed-use multiple dwelling units);
- No. 7.26.10.1.b), which permits net residential density on specific sites in excess of the range of 12–20 units per gross residential hectare stipulated in No. 7.5.1.1.a);
- No. 7.26.10.1.c), which limits residential development on lands designated “Medium/High Density Residential” to a maximum height of ten storeys; and
- No. 7.26.10.1.d), which permits live-work units and mixed-use buildings in the “Medium/High Density Residential” and “Commercial Mixed-Use” designations “within a building located on a lot/block with frontage on a public street capable of providing on-street parking during business hours” and which permits non-retail commercial uses in a mixed-use building above the ground floor.

The proposed OPA would amend the site-specific policies in Section 7.26.10.1 to provide for additional three-year increments in No. 7.26.10.1.a), to amend No. 7.26.10.1.b) to allow medium-density residential uses to exceed the specified range of 20–50 units per hectare,

to clarify that No. 7.26.10.1.e) applies on to lands designated “Commercial/Mixed Use” with frontage along Victoria Street North that are located west of Greenhouse Road (*i.e.*, that are not part of the Subject Lands, none of which will be designated “Commercial/Mixed Use”), and to delete No. 7.26.10.1.g) (which applies to lands designated “Employment Land I” with frontage along Victoria Street North and will therefore no longer be necessary following the proposed re-designations).

The staging in No. 7.26.10.1.a) currently provides for a total of 569 dwelling units (not including high-density apartment units or multiple-dwelling units on mixed-use blocks): 225 units for 2017 to 2019, 225 units for 2020 to 2022, and 119 units for 2023 to 2025. This policy also provides that “unrealized development potential from one time period may be assigned to the subsequent time periods.” At present, the portions of Phase 1 and Phase 2 that have already been registered account for a total of 367 dwelling units (314 single detached dwellings and 53 townhouse units), with another 156 dwelling units (maximum) planned in Phase 3 (all single detached dwellings). There is currently one Medium Density Residential block in Phase 4 (Block 43), which based on No. 7.26.10.1.a) could accommodate a maximum of 46 dwelling units.

Not including multiple-dwelling units on mixed-use blocks, the proposed draft plan modifications (see Section 2.2.1 above) would add a maximum of 362 dwelling units (267 single detached dwellings, 43 townhouse dwellings, and 52 stacked townhouse dwellings on Medium Density Block 52). Using the same base-rate allocation of 225 units per three-year increment, the proposed OPA would add two three-year periods to No. 7.26.10.1.a), providing for another 225 units for 2026 to 2028, and 137 units for 2029 to 2031. The provision that unrealized potential may be transferred to subsequent periods would remain, as would the existing exemption for high-density apartment units and mixed-use multiple-dwelling units (which is why the amended staging provisions do not account for the proposed modifications to Blocks 55 and 56).

3. Planning & Design Considerations

3.1 Sustainable Design / Green Building Report

Section 7.9.2 of the Township's current Official Plan contains policy statements regarding the sustainable design of development. According to Policy No. 7.9.2.a), these policies are meant to "promote green building technologies, renewable and alternative energy options and other sustainable design options for development," adding that the policies are intended to apply to all development in Urban Areas and Township Urban Areas. Under Policy No. 7.9.2.b), development proposals that conform with the policies in this section "shall be encouraged and supported, and shall be given priority for approval, subject to the staging policies of the Settlement."

The Proposed Development conforms with the overall direction encouraged by the policies in this section of the Official Plan. More specifically:

- all new buildings will be designed and constructed to achieve the most current Ontario Building Code standards, which aligns with current direction from the Province regarding sustainable design and which conforms with the Township's Official Plan Policy No. 7.9.2.d);
- all dwellings will be provided with ERV drain-water recovery systems, which will promote energy efficiency;
- landscaping will prioritize water-efficient and drought-resistant features, wherever feasible, in conformity with Policy No. 7.9.2.h);
- measures will be taken during construction to reduce waste and divert waste from landfills where feasible, in conformity with Policy No. 7.9.2.i); and
- all new development will be designed to adhere to all applicable standards and requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and the *Building Code Act, 1992*, in conformity with Policy No. 7.9.2.j).

Additional sustainable elements and practices will be at the discretion of the eventual individual property owners, such as the installation of on-site renewable energy systems (Policy No. 7.9.2.d) or the installation of rainwater harvesting and recirculation/reuse systems (Policy No. 7.9.2.g).

3.2 Urban Design & Architectural Control

Section 7.9.3 of the current Official Plan sets out general principles for urban design in new development, while Section 7.9.4 includes more specific direction for residential development in Urban Areas and Township Urban Areas. More detailed guidelines are set out in Appendix I to Chapter 7 of the current Official Plan.

The general principles in Section 7.9.3 direct the Township to support development that:

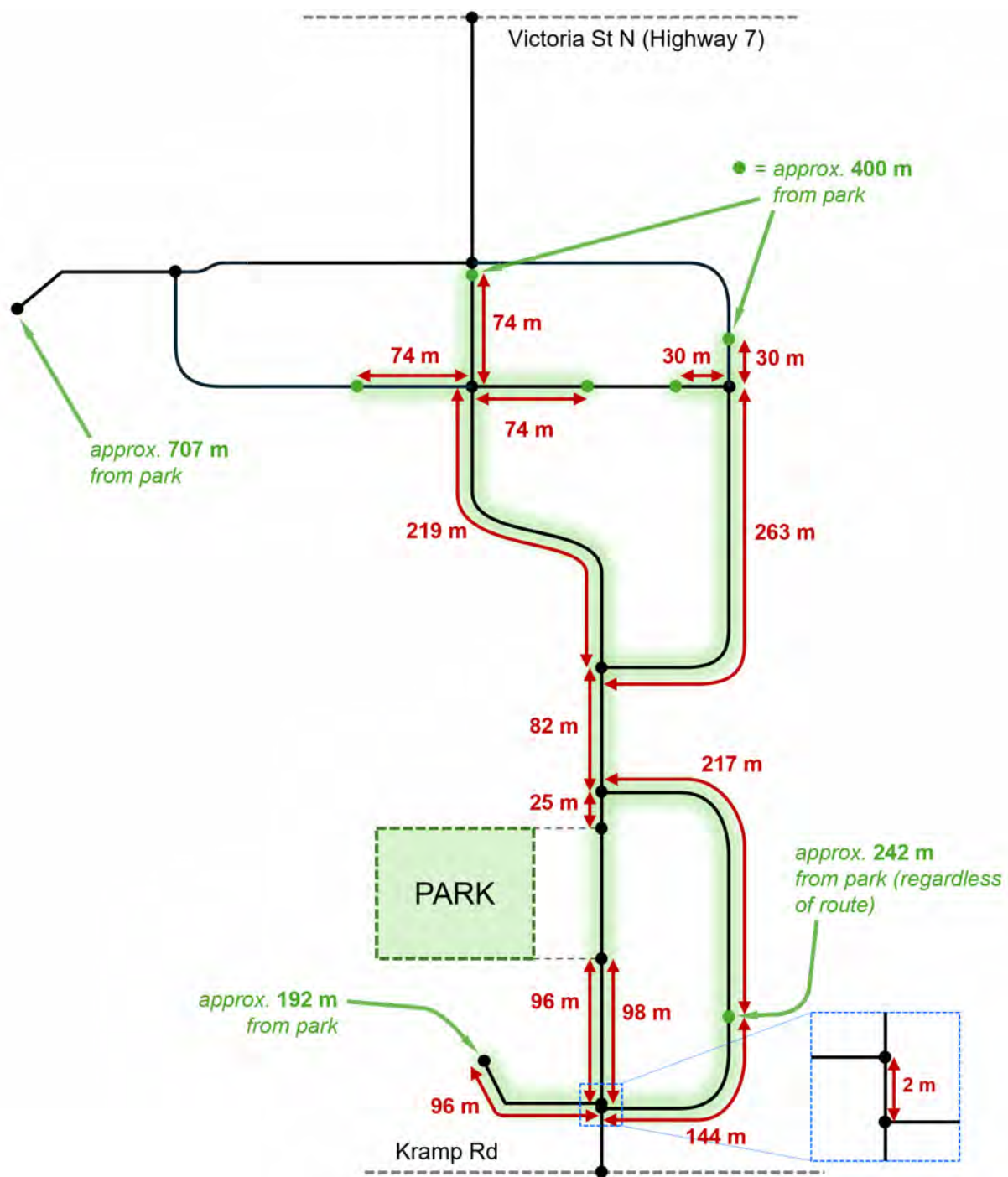
- “offers pedestrians and other users a high level of personal comfort, enjoyment and protection” (No. 7.9.3.b.i);
- “provides an integrated mix of uses, activities and experiences” (No. 7.9.3.b.ii); and
- “establishes appropriate and compatible relationships between built and natural environments” (No. 7.9.3.b.iv).⁷

The Proposed Development will include an integrated mix of residential, commercial, and open space uses, with a well-connected sidewalk network that will provide pedestrians with comfort and protection. The incorporation of natural heritage features and their associated buffers will support appropriate and compatible relationships between the built and natural environments, as directed by this policy.

The residential design policies in Section 7.9.4 of the Official Plan state that the “majority of residences should be within approximately 400 metres” of “an identifiable neighbourhood centre,” such as a park or public service facility (No. 7.9.4.b). With respect to the Easterly Portion of the Proposed Development (*i.e.*, excluding Block 52), there is approximately 2,135 metres of road centreline abutting the residential lots (meaning all internal roads except for the portion of Wambold Street that runs from Victoria Street North to Street O, between Block 55 and Block 56). Approximately 1,512 metres of that centreline (or approximately 70.8%) is located within 400 metres of the park: see **Figure 11**, which presents a simplified network diagram of the proposed internal road network.

Policy No. 7.9.4.b) further recommends that natural features be “incorporated into development plans and retained wherever possible.” The design of the proposed development is consistent with this recommendation.

⁷ Policy No. 7.9.3.b.iii) refers to development being designed to fit the context established by existing buildings or structures in the area, including historical buildings and structures, which does not particularly apply in the present situation.



Section 7.9.4 also directs development to “integrate a diversity of housing types” (No. 7.9.4.c) and to incorporate a road network “based on a modified grid system” (No. 7.9.4.d), both of which are true for the Proposed Development. Finally, No. 7.9.4.e) calls for buildings “designed to support a sense of place through an attractive, safe and pedestrian-friendly streetscape.” The Proposed Development will be consistent with the direction provided in this policy, with more specific details to be confirmed through the detailed design process.

The remainder of this discussion focuses on the “Design Guidelines for the Public Realm” set out in Section 2.0 of Appendix I to Chapter 7 of the Township’s current Official Plan. Most of the matters covered in Section 3.0 (“Design Guidelines for the Private Realm”) of Appendix I are yet to be confirmed, and will be addressed at appropriate later points of the process (such as during registration or through Site Plan Control, where applicable).

General Design Principles (Section 2.1) — The general principles set out in Section 2.1 direct development to include opportunities for visual overlook and easy physical access to adjacent roads, parks, and open spaces; to provide clear, unobstructed views to parks and open spaces from abutting roads; and to ensure easy pedestrian access and “the enjoyment of public roads.” Regarding the road network, No. 2.1.3 calls for streets that “facilitate all modes of transportation in a highly interconnected and logical manner,” as well as a road pattern that provides development blocks of appropriate sizes and allows for the underground location of all utilities.

As discussed above, the internal road network achieves a modified grid pattern (working within the parameters of on-site constraints). The proposed park is located in a visible location, which is enhanced by the adjacent SWM and natural heritage blocks, which will provide extended sightlines to and from the park.

Design Guidelines for Roads (Section 2.2) — According to the classifications in Section 2.2, Wambold Street will be a “Collector Road II” with a 23-metre right-of-way width that, according to the corresponding cross-section, will incorporate a 12-metre-wide road surface and 5.5-metre boulevards on both sides. The cross-section for “Local Roads” (*i.e.*, all other roads within the Proposed Development) includes a maximum 9.0 metres of paved road surface, with boulevards to provide a 2.5-metre grass verge and 1.7-metre-wide sidewalk on each side, for a total width of 17.4 metres. The remaining width shown in this cross-section is undefined. The proposed rights-of-way for the Local Roads in the Proposed Development (Street N, Street O, and Street P) are sufficient to accommodate all required elements that are defined in this cross-section.

Guidelines for Parks and Open Spaces (Section 2.3) — Section 2.3 of the detailed guidelines directs that natural heritage features and areas be “protected and integrated into

the community parks and open space system” and these features should be “physically and visually accessible from the abutting roads,” where appropriate and possible. This section also calls for Neighbourhood Parks to be located to provide recreational opportunities “for residents within an 800-metre radius.” Based on the network diagram shown in Figure 11, the entire internal road network is within 800 metres of the proposed park location, with the greatest centreline distance being approximately 707 metres from the park to the end of the Street O cul-de-sac. In addition to Park Block 126, the Proposed Development includes Open Space Block 125 at the southwesterly corner of Wambold Street and Street P. Block 125 would be considered a “Parkette” according to Section 2.3 of the design guidelines.

Guidelines for Stormwater Management Facilities (Section 2.5) — The policies in Section 2.5 of Appendix I state that SWM facilities, in addition to their functional role, will contribute to the “appearance and ambience” of the neighbourhood. The perimeter is to be planted using native species and flood-tolerant plants in a way that allows the facility to blend with the natural landscape. Facilities should not be fenced-in, but should instead be encircled by public trails.

The proposed facility on Block 66 will serve as a linkage between the two wetland blocks, thereby enhancing the connectivity of on-site natural features. As noted in Section 7.4 of the Functional Servicing & Stormwater Management Report (prepared by C.F. Crozier & Associates), the SWM facility will be encircled by a 4.0-metre-wide access road to facilitate maintenance while also serving as a public pathway. There is no intent to erect a fence around the facility unless absolutely necessary for safety reasons.

3.3 Affordable Housing Report

In order to inform planning and policy for affordable housing, the Township undertook a Housing Needs Assessment (“HNA”) in 2024, with the results presented in a report prepared by Tim Welch Consulting (“TWC”) and dated September 2024.⁸ Section 6 of the HNA Report sets out recommendations to support the goal of providing “for an appropriate range and mix of housing types and densities that will meet the projected housing needs of the community” (p. 46).

The Proposed Development aligns with a number of Action Items identified in Section 6 of the HNA Report, particularly those presented under Recommendation No. 7, “Promote and Accept a Range of Housing Models”. As described in Section 2.1 of this Planning

⁸ The Housing Needs Assessment Report (September 2024) is available through the Township’s “Affordable Housing Dashboard” website at <https://www.woolwich.ca/build-invest/planning-development/affordable-housing-dashboard/>.

Justification Report, the Proposed Development includes a range of unit types and sizes, with between approximately 56.7% and 64.7% of proposed dwelling units being provided in forms other than single detached dwellings (see also Section 5.2.3 below). This aligns with Action Item 7.2, “[Promote] plans of subdivision with increased housing density and a variety of unit types” and “consider more flexible as of right zoning in subdivisions in order to allow developers to move forward with alternatives to single detached homes,” and with Action Item 7.4, “encourage developers to consider housing forms that increase density within settlement areas and offer modest footprints and diversity of built form” (HNA Report, p. 51). In fact, Action Item 7.4 further states that “any plans of subdivision going forward should provide a variety of housing types which may include ... townhomes, stacked towns, [or] low-rise apartment buildings...” (p. 51).

The Proposed Development also aligns with Action Item 7.1 in the HNA Report, which calls on the Township to address “a need for smaller, affordable homes for seniors and single persons.” The mix and range of dwelling unit types and sizes in the Proposed Development will contribute towards meeting this need.

3.4 Financial Impact Statement

The pre-application consultation comments received from the Township included the directive that “the PJR shall include a section outlining the financial implications to the Township with respect to this development.” Accordingly, this section of the Planning Justification Report provides a basic Financial Impact Statement for the Proposed Development in fulfillment of that request.

The purpose of this section is to show that the Proposed Development will not adversely affect the Township’s finances, and the information presented here is intended as a high-level estimate of operating expenses and revenues, based on available information and on the design of the Proposed Development. In other words, the dollar values presented in this section are meant to serve as reasonable estimates and should not be interpreted as implying certainty regarding specific revenue or expense amounts.

The focus in this section is on impacts with regard to the Township of Woolwich (*i.e.*, Township development charges, operating expenses, and property taxes). Information from the following sources has been used in the discussion that follows:

- the Township of Woolwich’s website, regarding Township Development Charges, information on sidewalk snow clearance, water and sewer usage charges and Capital Reserve Charges, and property tax rates;

- the Township's 2024 Financial Information Return, submitted to the Province pursuant to s. 294 (1) of the *Municipal Act, 2001* and available publicly through the Ministry of Finance;
- the Township's 2024 Asset Management Plan, regarding the current inventory of infrastructure;
- the Township's May 2024 Parks and Recreation Master Plan, regarding the current inventory of parkland; and
- Statistics Canada's yearly population estimates.

Information regarding the Proposed Development has been taken from the proposed Draft Plan (as modified) and from other materials prepared in support of the present development applications.

3.4.1 Development Charges

Because of the Township's Cross-Border Servicing Agreement with the City of Kitchener, development in the Breslau Urban Area is subject to additional development charges for sanitary servicing, which are equal to the sanitary sewer service component of the City of Kitchener's development charges.

Based on the estimated range of dwelling units in the Proposed Development (refer to Table 4 on p. 18 above), and using the Township's 2026 Development Charges (<https://www.woolwich.ca/build-invest/development-charges/>), it is estimated that the Proposed Development will be required to pay between \$14.04 million and \$17.95 million in development charges to the Township (\$12.06–15.53 million for Township services plus an additional \$1.98–2.43 million for Breslau Sanitary Servicing charges). **Table 9** (p. 46) provides a breakdown of projected Township development charges by unit type. Because the exact number of bedrooms in each proposed apartment unit is not known at this point in the process, the "low" estimate assumes that all proposed apartment units have fewer than two bedrooms (and are therefore subject to the lower charge), whereas the "high" estimate assumes that all apartments will have two or more bedrooms.

It should be noted that watermains, sanitary sewers, roads, and other infrastructure associated with the Proposed Development are considered "local services" under the *Development Charges Act, 1997* and, as such, will be constructed at the developer's expense (and not funded through development charges). Similarly, external improvements to Kramp Road will be funded in accordance with the conditions of draft approval (as modified) and with the development agreement entered into with the Township.

Table 9 – Projected Development Charges for Proposed Development

Unit Type	DC Rate ^(a)	Low estimate		High estimate	
		No. of units	DC Amount ^(b)	No. of units	DC Amount ^(b)
Single Detached	\$ 35,319	195	\$ 6,887,205	267	\$ 9,430,173
Multiple Dwelling	\$ 25,283	176	\$ 4,449,808	183	\$ 4,626,789
Apartment (< 2 bdrm)	\$ 14,426	174	\$ 2,510,124	0	\$ 0
Apartment (2+ bdrm)	\$ 21,278	0	\$ 0	174	\$ 3,702,372
Non-Residential ^(b)	\$ 12.84	15,069.47	\$ 193,492	15,069.47	\$ 193,492
Total			\$ 14,040,629		\$ 17,952,826

^(a)Total Township rate (Full Services + Breslau Sanitary Servicing). Applied per unit for residential uses and per square foot for non-residential uses.

^(b)All values rounded to the nearest dollar.

^(c)"No. of units" given in square feet (15,069.47 sq.ft. = 1,400 m²).

3.4.2 Estimated Operating Expenses

As required under Subsection 294 (1) of the *Municipal Act, 2001*, each year the Township provides the Minister of Municipal Affairs and Housing with a return containing information regarding the financial affairs of the municipality, as designated by the Minister. These annual Financial Information Returns ("FIRs") are publicly available through the Ontario Ministry of Finance, at <https://efis.fma.csc.gov.on.ca/fir/index.php/en/financial-information-return-en/>. Information on operating expenses and revenues presented here has been taken from the Township's 2024 FIR (see Appendix "D" to this report). Again, the purpose of this discussion is to establish a reasonable estimate of annual operating expenses related to the Proposed Development, as proposed.

The services listed on Schedule 40 (Consolidated Statement of Operations: Expenses) to the Township's 2024 FIR are organized under nine categories: General Government, Protection Services, Transportation Services, Environmental Services, Health Services, Social & Family Services, Social Housing, Recreation & Cultural Services, and Planning & Development. Because the present discussion focuses on estimating expenses attributable to growth associated with the Proposed Development, the operating expenses considered here are limited to four columns on Schedule 40 ("Salaries, Wages & Employee Benefits", "Materials", "Contracted Services", and "Rents, Financial Expenses & Accretion Expense") and do not include interest on long-term debt, external transfers, amortization, or other

adjustments (inter-functional adjustments and allocation of program support) included on Schedule 40.

The “Operating Expenses” column in **Table 10** on p. 49 below shows the sum of the four Schedule 40 columns for each category listed. The “Social & Family Services” and “Social Housing” categories do not include any operating expenses in the four columns considered and have therefore been omitted from the remainder of this discussion. The values for each item in each of the four columns are provided in Appendix “D”.

To estimate the impact of the Proposed Development on the Township’s operating expenses, some of the listed services are considered as being “population-based,” meaning that we assume the need for such services, and thus the associated operating expenses, increases proportionally with the population. These “population-based” services comprise the General Government, Protection Services, Health Services, and Planning & Development categories, as well as the items under Recreation & Cultural Services except for Parks. The expenses associated with other services (water and sewage services, stormwater management, and roads) are assumed to increase as the amount of infrastructure in the Township increases. Similarly, the expenses associated with parks under the Recreation & Cultural Services category are assumed to increase with the amount of parkland in the Township.

Thus, the values in the “Estimated Service Rate” column in Table 10 have been obtained by dividing the value in the “Operating Expenses” column by the Township’s total inventory of the item in question, as reported in the 2024 Asset Management Plan (“AMP”):

- 236.2 centreline km of hard-top roads (2024 AMP, Table 6-1, p. 121);
- 116.9 centreline km of loose-top roads (Table 6-1);
- 129.0 km of watermains (125.3 km of Township-owned watermains plus 3.7 km of “dual-use” watermains operated and maintained by the Township under shared ownership with the Region: see 2024 AMP, p. 58 and Table 5-1, p. 62);
- 96.0 km of sanitary sewers (Table 5-10, p. 75); and
- 99.5 km of storm sewer mains (Table 5-19, p. 92).

In addition to the above, the 2024 AMP indicates a total of 130.9 km of sidewalks in the Township (Table 6-1, p. 121). However, the only Schedule 40 item explicitly related to sidewalks is “Winter Control - Sidewalks, Parking Lots Only”, with a total of \$525,420 under the four columns being considered here. For present purposes, we assume that these are the operating expenses associated with providing snow clearance for municipally owned parking lots and certain sidewalks for which the Township has assumed this responsibility.

The Township does not provide a list on its website, but from the information available it appears there are five municipally owned public parking lots (Breslau Community Centre; 3 Maple Street, 6 Mill Street, and Wyatt Street in Elmira; and 3 Water Street in St Jacobs), plus two other parking lots for which the Township is responsible for winter control (the Woolwich Memorial Centre and Township Administration Centre, both in Elmira). Using information and aerial photos from the Region of Waterloo's online GIS Locator (<https://region-of-waterloo-geohub-rmw.hub.arcgis.com/>), we estimate that these parking lots occupy a combined area of approximately 41,110 m².

Based on the Sidewalk Snow Clearing Maps on the Township's website (see <https://www.woolwich.ca/learn-about/roads-and-sidewalks/>), the Township is responsible for clearing approximately 83.15 km of sidewalk (77.11 km in Elmira and 6.05 km in other settlement areas). Assuming an average sidewalk width of 1.8 metres gives approximately 149,670 m² of sidewalk for which the Township provides winter control. In other words, we estimate that the Township provides winter control for a total area of approximately 190,780 m², of which 21.5% is municipal parking lot and 78.5% is sidewalk. The value of \$412,213 shown under "Operating Expenses" for sidewalks in Table 10 is therefore 78.5% of the total \$525,420 from Schedule 40 to the 2024 FIR.

Outside of Elmira, sidewalk snow clearance provided by the Township appears generally to be limited to sidewalks that abut parks, open spaces, and other municipally owned properties. For the Proposed Development, this means that the Township would likely assume responsibility for clearing the sidewalks along Wambold Street abutting Park Block 124, part of Greenland Setback Block 79, SWM Block 66, and Wetland Block 73, as well as the sidewalk abutting Open Space Block 125 at the corner of Wambold Street and Street P.⁹ The sidewalks in question have a total length of approximately 461 metres, which is the value used in Table 10.

According to the Township's May 2024 Parks and Recreation Master Plan, there is currently 78.27 hectares of active parkland in the Township (13.58 ha in Breslau, 37.53 ha in Elmira, 12.13 ha in St Jacobs, and 15.04 ha in the Rural Settlements and Countryside: see pp. 45–51). The Township population used in Table 10 is the 2024 population estimated by Statistics Canada in its annual population estimates.¹⁰ (The 2024 population has been used,

⁹ To clarify, nothing in this paragraph should be construed as implying that the Township has in any way agreed to assume such responsibility at this time.

¹⁰ Statistics Canada, *Table 17-10-0155-01: Population estimates, July 1, by census subdivision, 2021 boundaries*. <https://doi.org/10.25318/1710015501-eng>.

Table 10 – Estimated Annual Expenses for Proposed Development

Service	Operating Expenses ^(a)	Township Total	Estimated Service Rate	Amount in Proposed Devpmt	Estimated Annual Cost
Transportation Services					
Roads (Paved) ^(b)	\$ 3,926,864	236.2 km	\$ 16,625.17 / paved km	3.8254 km	\$ 63,598
Roads (Unpaved) ^(c)	\$ 672,057	116.9 km	\$ 5,748.99 / unpaved km	-1.4258 km	-\$ 8,197
Roads (Operations & Roadside) ^(d)	\$ 585,092	353.1 km	\$ 1,657.02 / road km	3.8254 km	\$ 6,339
Sidewalks (Winter Control) ^(e)	\$ 412,213	83.2 km ^(f)	\$ 4,957.46 / sidewalk km	0.461 km	\$ 2,285
Environmental Services					
Water Distribution / Transmission	\$ 1,565,258	129.0 km	\$ 12,133.78 / km (water main)	3.457 km	\$ 41,946
Wastewater Collection / Conveyance	\$ 866,577	96.0 km	\$ 9,026.84 / km (sewer main)	3.664 km	\$ 33,074
Urban Storm Sewer System	\$ 833,354	99.5 km	\$ 8,375.42 / km (storm sewer)	2.733 km	\$ 22,887
Recreation & Cultural Services					
Parks	\$ 1,033,861	78.27 ha	\$ 13,208.91 / ha	1.22 ha	\$ 16,115
Population-Based Services					
General Government	\$ 3,921,121				
Protection Services	\$ 3,989,643				
Health Services	\$ 81,656				
Recreation & Cultural Services ^(g)	\$ 6,262,799				
Planning & Development	\$ 2,172,793				
Subtotal (Population-Based)	\$ 16,428,012	31,520 ppl	\$ 521.19 per capita	1,577 ppl	\$ 821,922
				Total	\$ 999,969

^(a)Expenses for 2024, as reported on Schedule 40 to Township's 2024 Financial Information Return (FIR). ^(b)Includes FIR entries for "Roads - Paved" (0611), "Winter Control - Except Sidewalks, Parking Lots" (0621), and "Street Lighting" (0650). ^(c)FIR entry for "Roads - Unpaved" (0612). ^(d)FIR entry for "Roads - Traffic Operations & Roadside" (0614). ^(e)FIR entry for "Winter Control - Sidewalks, Parking Lots Only" (0622). ^(f)Includes only those sidewalks for which Township provides winter clearance. ^(g)Includes FIR entries for "Recreation Programs" (1620), "Recreation Facilities - All Other" (1634), and "Libraries" (1640).

rather than the 2025 estimate, to match the 2024 FIR from which the financial information in this section has been taken.)

The values shown in the “Amount in Proposed Devpmt” column in Table 10 are based on the modified Draft Plan (see Figure 9 above), as well as the servicing plans prepared by C.F. Crozier & Associates Inc. The internal streets shown on the Draft Plan, as modified, have a centreline distance of 2.3996 km, while the segment of Kramp Road between Greenhouse Road and Wambold Street has a centreline distance of 1.4258 km. As part of the Proposed Development, this segment of Kramp Road will be upgraded from its current gravel surface to a paved semi-urban cross-section. The negative value used for “Roads (Unpaved)” in Table 10 is meant to reflect this conversion of 1.4258 centreline km from unpaved (with an estimated service rate of \$5,748.99 per km) to paved (with an estimated rate of \$16,625.17 per km). The value of 3.8254 km represents the 2.3996 centreline km of proposed internal streets plus 1.4258 centreline km along Kramp Road. The value of 1.22 ha for Parks is simply the area of Park Block 124, while the population used for the per-capita items is according to the calculation shown in Table 4 of this report (see p. 18).

Once all of the elements discussed above have been combined, it is estimated that the Proposed Development would represent an estimated operating expense of \$999,969 per annum (all estimates rounded to the nearest dollar), assuming a population at the high end of the range calculated in Table 4. Using the low-end estimated population of 1,326 people gives estimated operating expenses of \$869,149 per annum. These estimated annual expenses equate to approximately \$634–\$656 per person or approximately \$1,595–\$1,603 per unit.

3.4.3 Estimated Revenues

Beyond the payment of development charges, estimated revenues to the Township from the Proposed Development are considered as coming from three sources: user fees and service charges, Capital Reserve Charges, and property taxes. According to the financial strategy in the Township’s 2024 AMP, drinking water distribution and sanitary wastewater collection are rate-funded assets, while the rest are tax-funded assets.

As of March 2025, the Township charges usage rates of \$2.27 per cubic metre for water and \$3.72 per cubic metre for sewer.¹¹ According to the Functional Servicing & Stormwater Management Report (“FSR”) prepared by C.F. Crozier & Associates Inc., discussed in greater detail in Section 4.2 below, the anticipated average daily demand for the Proposed

¹¹ See <https://www.woolwich.ca/pay-buy/water-billing/> under “Additional Information: Water and Sewer Rates.”

Development is 4.15 litres per second for water service (FSR, Table 2, p. 5) and 5.70 litres per second for sanitary sewer service (0.39 L/s for Block 52 and 5.31 L/s for the Easterly Portion: see FSR, Table 3, p. 7). Converting these average rates from L/s to m³/year and applying the Township's rates (as of March 1, 2025) results in annual usage charges of \$297,288.37 per annum for water service and \$669,147.35 per annum for sewage service for the Proposed Development. The calculations of these rates are shown below:

Water Usage Charge (Annual):

$$4.15 \frac{\text{L}}{\text{s}} \times \frac{1}{1,000} \frac{\text{m}^3}{\text{L}} \times 86,400 \frac{\text{s}}{\text{day}} \times 365.25 \frac{\text{days}}{\text{year}} \times \frac{\$2.38}{\text{m}^3} = \frac{\$311,694.42}{\text{year}}$$

Sewer Usage Charge (Annual):

$$5.70 \frac{\text{L}}{\text{s}} \times \frac{1}{1,000} \frac{\text{m}^3}{\text{L}} \times 86,400 \frac{\text{s}}{\text{day}} \times 365.25 \frac{\text{days}}{\text{year}} \times \frac{\$3.97}{\text{m}^3} = \frac{\$714,116.93}{\text{year}}$$

In addition to usage charges, the Township imposes bimonthly Capital Reserve Charges on water meters and sewer laterals, based on meter size.¹² It is anticipated that each single detached dwelling and each townhouse dwelling unit (street, stacked, and back-to-back) will have a 1-inch water meter, while each of the four proposed mixed-use buildings will have one 6-to-8-inch water meter. According to the Township's website, the amount of the bimonthly Capital Reserve Charge is \$86.73 per 1-inch meter (\$41.92 for water and \$44.81 for sewer) and \$2,026.50 per 6-to-8-inch meter (\$986.17 for water and \$986.17 for sewer). Based on the anticipated unit ranges shown in Table 4 (p. 18), the total bimonthly Capital Reserve Charges for the Proposed Development would be \$40,283–\$47,135, which equates to \$241,697–\$282,807 per annum. The calculations for the bimonthly Capital Reserve Charges are shown in **Table 11**.

Combined, the annual usage charges and Capital Reserve Charges for the Proposed Development add to an estimated total of \$1,267,508–\$1,308,618 per annum: see **Table 12**. Again, these amounts (which have been rounded to the nearest dollar) are intended only as reasonable estimates for the purpose of assessing anticipated financial impacts.

¹² See the table under “Bimonthly Capital Reserve Charges” at <https://www.woolwich.ca/pay-buy/water-billing/>. For the purposes of this discussion, that table is interpreted as indicating that the amount of the Capital Reserve Charges for water and sewer services are both determined based on the size of the water meter.

Table 11 – Calculation of Bimonthly Capital Reserve Charges

Unit / building type	No. of units	Meter size	Total charge per meter	Bimonthly charge
<i>Low end of unit range</i>				
Single detached dwelling	195 units	1"	× \$86.73 / meter =	\$ 16,912.35
Townhouse dwelling	176 units	1"	× \$86.73 / meter =	\$ 15,264.48
Mixed-use building	4 buildings	6–8"	× \$2,026.50 / meter =	\$ 8,106.00
Total				\$ 40,282.83
<i>High end of unit range</i>				
Single detached dwelling	267 units	1"	× \$86.73 / meter =	\$ 23,156.91
Townhouse dwelling	183 units	1"	× \$86.73 / meter =	\$ 15,871.59
Mixed-use building	4 buildings	6–8"	× \$2,026.50 / meter =	\$ 8,106.00
Total				\$ 47,134.50

Table 12 – Estimated Revenue: Water & Sewer Services

Service	Low end of unit range	High end of unit range
Usage (Water)	\$ 311,694	\$ 311,694
Usage (Sanitary Sewer)	\$ 714,117	\$ 714,117
Capital Reserve Charge	\$ 241,697	\$ 282,807
Total	\$ 1,267,508	\$ 1,308,618

Note: All amounts have been rounded to the nearest dollar.

Projected revenues from user fee and service charges for services other than water and wastewater are estimated from information provided on Schedule 12 (Grants, User Fees & Service Charges) to the Township's 2024 FIR. Revenues from user fees and service charges for "population-based" services have been estimated on a per-capita basis (**Table 13**), whereas fees and charges for other services (transportation and parks) have been estimated using the same bases as operating expenses (**Table 14**), with one exception being made for sidewalks: whereas operating expenses in Table 10 were estimated based only on sidewalks for which the Township provides winter clearance, revenues in Table 14 are estimated based on the total 130.9 km of sidewalks in the Township (according to Table 6-1 in the 2024 AMP). Thus, for the Proposed Development, the estimated revenue for sidewalks is based on the total 4.412 km of sidewalks in the Proposed Development (and not just the estimated 0.461 km that we assume the Township will assume responsibility for clearing).

As shown in Table 13 and Table 14, respectively, the estimated revenues for "population-based" services from the Proposed Development is \$239,503–\$284,840 per annum, and the estimated revenue for other services (transportation services and parks) is \$7,837 per annum.

Table 13 – Estimated Revenues for "Population-Based" Services

Service	User Fees & Service Charges ^(a)	Estimated Service Rate [per capita] ^(b)	From Proposed Development ^(c)	
			Low Estimate (1,326 ppl)	High Estimate (1,577 ppl)
General Government	\$120,234	\$3.81	\$5,058	\$6,016
Protection Services	\$269,942	\$8.56	\$11,356	\$13,506
Health Services	\$78,898	\$2.50	\$3,319	\$3,947
Recreation & Cultural Services ^(d)	\$2,401,842	\$76.20	\$101,042	\$120,168
Planning & Development	\$2,822,267	\$89.54	\$118,729	\$141,203
Total	\$5,693,183	\$180.62	\$239,504	\$284,840

^(a)As reported in Column 4 on Schedule 12 to the Township's 2024 Financial Information Return ("FIR").

^(b)Based on a 2024 population of 31,520 people, according to Statistics Canada's yearly estimates.

^(c)Values rounded to the nearest dollar.

^(d)Not including "Parks" (Line 1610).

Table 14 – Estimated User Fee Revenues from Transportation Services & Parks

Service	User Fees & Service Charges ^(a)	Estimated Service Revenue Rate ^(b)	Estimated Revenue (Proposed Devpmt) ^(c)
Roads (Paved)	\$2,700	\$ 11.43 / km (paved)	\$ 44
Roads (Unpaved)	\$ 0	\$ 0.00 / km (unpaved)	\$ 0
Roads (Operations & Roadside)	\$ 12,645	\$ 35.30 / km (roads)	\$ 135
Sidewalks (Winter Control)	\$ 36,220	\$ 276.20 / km (sidewalk)	\$ 1,221
Parks	\$ 412,945	\$ 5,275.90 / ha	\$ 6,437
Total	\$ 464,330		\$ 7,837

^(a)As reported in Column 4 on Schedule 12 to the Township's 2024 FIR.

^(b)Estimated using the same values shown in the "Township Total" column of Table 10, with the exception of sidewalks, for which the Township's total inventory of 130.9 km has been used.

^(c)Estimated using the same values shown in the "Amount in Proposed Devpmt" column of Table 10, with the exception of sidewalks, for which the estimated total of 4.412 km in the Proposed Development has been used. Amounts have been rounded to the nearest dollar.

Table 15 – Estimated Property Tax Revenue

Land Use / Dwelling Type	Tax Class ^(a)	Average assessmt value	Low estimate		High estimate	
			No. of units	Tax amount ^(b)	No. of units	Tax amount ^(b)
Single Detached	RT	\$ 400,000	195	\$ 216,392	267	\$ 296,290
Street Townhouse	RT	\$ 350,000	36	\$ 34,956	43	\$ 41,752
Stacked Townhouse	NT	\$ 300,000	52	\$ 43,278	52	\$ 43,278
Back-to-Back Townhouse	NT	\$ 300,000	88	\$ 73,240	88	\$ 73,240
Apartment	NT	\$ 275,000	174	\$ 132,748	174	\$ 132,748
Commercial	CT	\$ 750,000	4	\$ 16,229	4	\$ 16,229
Total				\$ 516,843		\$ 603,537

^(a)2024 Final Rates (Township) by tax class: RT (Residential) = 2.77425‰; NT (New Multi-residential) = 2.77425‰; CT (Commercial) = 5.40979‰.

^(b)Values have been rounded to the nearest dollar.

Finally, anticipated property tax revenues — estimated using the Township's 2024 final tax rate to maintain a consistent basis of comparison with the 2024 FIR — are presented in **Table 15**, using conservative estimates for the average assessment values of proposed dwellings (which should be understood as rough approximations only). However, even if we exclude property tax revenue entirely, the estimates presented in this section suggest that the Proposed Development will generate positive net revenue: see **Table 16**.

It should be emphasized one last time that the summary presented in Table 16 is meant to show that, based on the information available, the Proposed Development is anticipated to have a net positive financial impact on the Township.

Table 16 – Financial Impact Statement: Estimated Net Revenue

Item	Low Estimate	High Estimate
<i>Estimated Expenses</i>		
Transportation Services	\$ 64,025	\$ 64,025
Environmental Services	\$ 97,907	\$ 97,907
Parks	\$ 16,115	\$ 16,115
Population-Based Services	\$ 691,102	\$ 821,922
Total Estimated Expenses	\$ 869,149	\$ 999,969
<i>Estimated Revenues</i>		
Usage Charges (Water & Sewer)	\$ 1,025,811	\$ 1,025,811
Capital Reserve Charges (Water & Sewer)	\$ 241,697	\$ 282,807
Fees & Charges (Population-Based)	\$ 239,504	\$ 284,840
Fees & Charges (Transportation & Parks)	\$ 7,837	\$ 7,837
Property Taxes	\$ 516,843	\$ 603,537
Total Estimated Revenues	\$ 2,031,692	\$ 2,204,832
Estimated Net Revenue	\$ 1,162,543	\$ 1,204,863

Note: All amounts have been rounded to the nearest dollar.

4. Supporting Studies & Reports

4.1 Environmental Impact Study

The Environmental Impact Study (“EIS”) accompanying these applications, dated January 2026, was prepared by Natural Resource Solutions Inc. (“NRSI”) (who also prepared the Comprehensive EIS submitted with the original Hopewell Crossing applications in 2011). The EIS is based on available background information, including data related to the post-construction monitoring of earlier phases of the subdivision, and the results of field surveys completed in January 2026 (EIS, Section 1.0, p. 1). Additional field surveys will be conducted in May–June 2026 and an Addendum EIS prepared and submitted (p. 1).

4.1.1 Wetland Classification

The Subject Lands contain two wetland features: a larger feature with an area of approximately 15 hectares, and a smaller one of about 0.6 hectares (Section 5.1.1, p. 26). The EIS notes that the larger wetland feature is bisected by an unnamed tributary of Hopewell Creek that “was historically an anthropogenic channel intended to drain the wetland for agricultural land use” (Section 4.1, p. 12). According to Section 5.1.1, the two wetlands have been mapped as part of the Breslau Provincially Significant Wetland (“PSW”) Complex, which “includes other wetlands located along Hopewell Creek and to the south of the subject lands” (p. 26). The former are located approximately 650–700 metres from the large wetland on the Subject Lands and separated by existing development and row crop fields, while the latter “are separated by 200–500 m of row crop and sod fields as well as residential and commercial lots” (p. 26).

According to the EIS, revisions to the Ontario Wetland Evaluation System (“OWES”) in 2022 made changes to the methodology used for complexing wetlands. In consideration of these changes, the EIS has determined that “the designation of the subject land wetlands as PSW is no longer valid and these wetlands should be considered non-PSW” (p. 27), although the larger wetland still meets the criteria to be considered locally significant (p. 28). Based on the change in designation, the EIS supports a reduction in the width of Greenland Setback Block 79, stating that “a 15 m buffer to the non-PSW wetlands is appropriate” (p. 52).¹³

¹³ This recommendation does not apply to Greenland Setback Block 78 on the Draft Plan, which has already been created and conveyed to the Township through the registration of Phase 1B and will therefore remain unaltered.

Importantly, Section 5.1.1 of the EIS further notes that the existing crop fields on the Subject Lands have been “cultivated to the wetland edges,” meaning that “the implementation of buffers represents a substantial gain in natural cover” (p. 52).

4.1.2 Recommended Enhancements

In addition to the establishment of 15-metre wetland buffers, which as noted above represent an improvement to existing site conditions, Section 7.1 of the EIS recommends other enhancements to support the naturalization of buffers and management of invasive species (pp. 54–55). Those recommended enhancements include:

- Naturalize wetland buffer areas through the planting of site-appropriate native trees and shrubs, in accordance with a Restoration Planting Plan that demonstrates the species, quantities, and sizing of materials to be planted.
- Apply nurse crops of Annual Oats, Pearl Millet, or Annual Rye to ensure adequate herbaceous cover in the buffer areas on the easterly block and to suppress agricultural weeds in the early stage of buffer naturalization.
- Manage Common Buckthorn and Glossy Buckthorn along the edges of natural features, using herbicide applied by a licensed herbicide applicator, to ensure buffer areas are not taken over by invasive species, and prepare a brief memorandum following the herbicide treatment to document that the work was completed, including the contractor’s name, application date, and areas covered, to be provided to the Township upon request.
- Create two or three turtle nesting features along the easterly buffer of the large wetland (similar to features installed by Thomasfield in the Hopewell Crossing subdivision west of Greenhouse Road), and coordinate the installation of these nesting features as a component of the buffer naturalization.

Implementing these enhancements “will ultimately improve the quality and resiliency of the wetlands and riparian areas” on the Subject Lands (EIS, p. 54) and “will protect the form and function of the wetland and present a net gain in natural cover of approximately 1.4 ha” (p. 58).

4.1.3 Impacts & Mitigation Measures

Section 6.3 of the EIS identifies two areas of direct impact to natural features associated with the Proposed Development: the removal of approximately 0.9 hectares of meadow on Block 52 and the removal of some landscaping and fenceline trees around the dwelling at the northeasterly corner of the Subject Lands and along the shared property line with Belgian Nursery (p. 36). This section also notes that the removal of the dwelling and associated outbuildings “may also constitute a direct impact if surveys in May-June 2026

confirm that any of these structures are being used by significant wildlife (bats, birds or snakes)” (p. 36).

Even though the Proposed Development will result in the removal of 0.9 hectares of meadow on Block 52, the EIS notes that 0.7 hectares of this meadow will be retained, which along with “the creation of approximately 2 ha of meadow along the eastern edge of the wetland represents a net gain in cover of this community type” (p. 37). With regard to the second area of direct impact, the EIS notes that the trees proposed for removal “do not provide any appreciable linkage function,” and that tree retention has been maximized to the extent possible, including “the retention of trees on or near property lines which, in addition to wildlife habitat, also provide a privacy barrier for residents or visitors to the adjacent cemetery” (p. 37). The EIS also includes a Tree Preservation Plan in Appendix IV that sets out mitigation and compensation measures for tree removals.

Table 17 on the following pages summarizes the mitigation measures recommended in Sections 6.3, 6.4, and 6.5 of the EIS. In addition to these, Section 7.2 recommends pre-, during-, and post-construction monitoring, which includes pre-construction inspection of erosion and sediment control measures and tree protection measures, periodic monitoring of the same during construction, as well as the inspection of ESC measures after significant rainfall events (*i.e.*, an event involving more than 15mm over a 24-hour period or with a rate ≥ 5 mm/hr with at least 10mm received), the pruning of any tree limbs or roots damaged during construction by a certified arborist, measures to ensure that fueling of machinery takes place at a designated location away from the wetlands and watercourse, and the storage of machinery and materials in designated areas away from natural features (p. 56). Recommended post-construction monitoring includes the inspection of buffer plantings after a two-year period (with a survival rate of 70% being stipulated in the tender for installation).

Overall, the EIS concludes that the implementation of its recommendations, which are intended to “promote the establishment of functional natural feature buffers and the enhancement of the existing wetland and upland habitats,” will help ensure that impacts from development on natural features “can be minimized with overall benefit to the wetland features” (p. 58).

Table 17 – Mitigation Measures Recommended in EIS

Impact	Recommended Mitigation
Impacts from grading and vegetation removal	- Erect erosion and sediment control (ESC) fencing at grading limit prior to construction, to prevent accidental encroachment or disruption of natural features. - Install tree protection fencing around trees to be retained that are located near areas of grading. - Provide compensation for tree removals, as outlined in the Tree Preservation Plan. - Establish meadow along easterly edge of large wetland and surrounding smaller isolated wetland, as an early successional stage preceding thicket and woodland formation.
Impacts to wildlife and wildlife habitats	- Ensure that vegetation removal takes place outside active nesting period for breeding birds. - Avoid stockpiling tall mounds of soil, to avoid the creation of nesting habitat for Bank Swallow. - Temporarily stop work if wildlife is encountered, to allow safe passage to adjacent natural areas or off-site, and contact a biologist if assistance is needed to relocate wildlife.
Impacts to aquatic features and fish habitat	- Ensure that any temporary stockpiles (soil, construction debris, etc.) are located at least 30 metres from the on-site watercourse. - Avoid removal of riparian vegetation wherever possible, and re-vegetate any areas of exposed soil adjacent to the watercourse with appropriate native plant species following construction. - Develop and implement a comprehensive ESC program during construction, including the installation of sediment fencing and regular monitoring. - Develop an Emergency Spill Response Plan to be implemented in the event of a spill of deleterious substance. - Follow Pathways of Effects outlined by DFO to ensure appropriate mitigation measures are followed. - Re-examine potential <i>Fisheries Act</i> implications at detailed design stage.
Changes to wetland hydrology and water quality	- Construct SWM facility as proposed, including forebay design, oil-grit separator, and riprap-lined outlet. - Include a pipe/weir structure as part of the SWM berm, as proposed, to ensure the smaller wetland continues to receive adequate surface water and maintains flood attenuation capacity. - Implement rear yard infiltration trenches throughout the subdivision, as proposed in the SWM strategy. - Implement planting of wetland buffers and naturalization of SWM pond periphery to improve connectivity between wetland features.

Table 17 – Mitigation Measures Recommended in EIS (continued)

Impacts	Recommended Mitigation
Disturbances to adjacent natural features and wildlife habitats	- Clearly demarcate construction limits using ESC or tree protection fencing, including 15m construction setback from wetlands using heavy-duty sediment fence. - Install tree protection fencing at least 1m from driplines to protect root zones from soil compaction and other disturbance. - Dampen areas of bare, dry soil as needed to avoid dust-related impacts. - Limit construction activities to 7 a.m.–7 p.m. to reduce noise impacts. - Use directional lighting for permanent fixtures, and ensure lighting equipment used during construction is turned off or at least directed away from natural features.
Erosion and sedimentation impacts	- Have a qualified engineer prepare an ESC plan before initiating any construction activities. - Conduct weekly ESC inspections, as well as after significant rainfall events. - Stabilize and re-vegetate any disturbed areas as quickly as possible, and stabilize any slopes greater than 5:1 as soon as possible.
Induced impacts	- Establish plantings in buffer areas to increase woody vegetation that will deter entry. - Consider permanent rear lot fencing in some areas.

4.1.4 Water Balance Report

Section 6.4.1 of the EIS (pp. 45–49) presents a high-level Feature-Based Water Balance assessment to consider potential impacts on wetland communities. As noted in this section of the EIS, a more fulsome assessment will be provided with the Addendum EIS (p. 45). Both wetland features on the Subject Lands have the potential of being impacted by the Proposed Development. A full characterization of the two features will require additional data, to be collected during the surveys in May–June 2026, in order to determine their sensitivity to hydrological change.

This section of the EIS notes that the proposed grading “does not result in a substantial increase or decrease in the cumulative size” of either catchment area within the Proposed Development, “which helps to balance the pre- and post-development water budget for the large wetland” (p. 47).

4.2 Functional Servicing & Stormwater Management Report

The Functional Servicing & Stormwater Management Report (“FSR”) for the Proposed Development was prepared by C.F. Crozier & Associates Inc. (“Crozier”) and is dated February 2026.

As noted in Section 4.4 of the FSR, the proposed method of providing water services involves extending 300mm-diameter watermain from existing local watermain in the Hopewell Crossing subdivision along Kramp Road to the Subject Lands, and along part of Greenhouse Road to provide servicing for Block 52 (p. 5). Local roads within the Easterly Portion, as well as the townhouse development on Block 52, will have 150mm-diameter mains (pp. 5–6). It is expected that the proposed mixed-use buildings will have sprinkler systems and therefore require dedicated domestic and fire lines, complete with water meters and backflow preventers (p. 6), with sizing to be confirmed during the Site Plan Approval stage for development on these blocks.

Water demand for residential uses has been calculated using an average daily water demand of 225 L/capita/day, as required by the Region’s design criteria. The calculated average daily demand is 4.3 L/s, with a peak hourly demand of 16.0 L/s (p. 5). Section 4.3 of the FSR notes that fire flow demand will be calculated at the detailed design stage, after the lot fabric of the Proposed Development has been confirmed (p. 5).

Section 5.2 of the FSR notes that “sanitary drainage for the Subject Lands was accounted for in the Hopewell Crossing development” (p. 6), with anticipated flows being calculated at 34.217 L/s for the Easterly Portion of the Subject Lands and 3.9075 L/s for the westerly portion (*i.e.*, Block 52). Based on sanitary demand calculations for the proposed mix of residential and commercial uses, “it is estimated that total peak sanitary flow rates for the eastern and western portions of the Subject Lands are 26.09 L/s and 2.01 L/s, respectively. Since these flow rates are lower than those originally anticipated in the Hopewell Crossing development for the Subject Lands, and the sewers are sized for the larger flow rates, it is anticipated that there is adequate downstream sanitary capacity for the Subject Lands” (Section 5.2, p. 7).

The provision of sanitary services for the development is proposed by a combination of 200mm and 250mm sanitary sewer mains within municipal road rights-of-way, with a sanitary sewer along Kramp Road that follows the same alignment as the original design proposed for the Hopewell Crossing subdivision (Section 5.3, p. 7).

As noted in Section 7.4 of the FSR, the stormwater management pond has been designed in accordance with Township and Ministry design criteria to provide quantity, quality, and

erosion control (p. 13). Quality controls are designed to provide an Enhanced Level of Protection. Detailed water balance calculations are provided in Appendix D to the FSR.

Based on the information provided, the FSR concludes that the Proposed Development can be approved from a functional servicing and stormwater management perspective (Section 8.0, p. 16).

4.3 Geotechnical Investigation

A Geotechnical Investigation (“GI”) for the Hopewell Crossing subdivision was undertaken by Peto MacCallum Ltd. (“Peto MacCallum”), the findings of which were presented in a report dated April 8, 2011. Peto MacCallum prepared a Supplementary Geotechnical Investigation (“SGI”) for the subdivision, dated April 25, 2017, to address certain changes to the subdivision design, specifically the sanitary pumping station on Block 81, sanitary sewers along certain streets, and four stormwater management ponds (SGI, p. 2).

Among other things, the SGI Report includes a description of field investigation procedures and summary of the subsurface soil and groundwater conditions encountered; foundation design options for the sanitary pumping station; information regarding below-grade tanks, including lateral earth pressures and hydrostatic uplift considerations; recommendations regarding excavation, including safe side slopes and dewatering requirements; pipe bedding, cover, and backfill requirements; and details regarding stormwater pond design. Section 1.2 of the SGI notes that “the detailed design of the proposed facilities have not been finalized at the time of this report” (p. 3). Accordingly, the SGI recommends that design drawings be submitted for geotechnical review for compatibility with site conditions and the report’s recommendations when design details are available (Section 4.5, p. 19).

4.4 Hydrogeological Site Assessment

Peto MacCallum undertook a Hydrogeological Site Assessment (“HSA”) as part of the original Hopewell Crossing Subdivision applications, with the findings presented in a report dated April 15, 2011. The scope of the HSA was “to determine potential impacts of the construction dewatering on the surrounding natural and man-made features and water wells, and evaluate the ground water level control measures required during excavation and construction of the proposed developments below the groundwater levels” (Section 1.2, p. 2). The concluding remarks and recommendations in Section 5 of the HSA Report include the recommendation that an application for a permit to take water from the Ministry of the Environment be submitted and that a construction dewatering monitoring program be implemented (pp. 24–27).

4.5 Chloride Impact Assessment

The Chloride Impact Assessment (“CIA”), which includes a Winter Maintenance Plan, was prepared by Crozier and is dated May 8, 2026. The purpose of the CIA is to review the proposed development design regarding impacts from road salt application and to recommend winter maintenance methods that will limit sodium and chloride concentrations in the water supply (CIA, Section 1.0, p. 2). The CIA is required to address source water protection policies and requirements under the *Clean Water Act, 2006*.

Section 4.0 of the CIA notes that snow storage areas will be located primarily along landscaped areas and paved parking spaces, where meltwater can be directed towards the internal storm sewer system, ultimately discharging to the proposed SWM facility (p. 3). Site grading has been designed to ensure all runoff is captured by the internal storm sewer system. Regular inspection and maintenance of all catchment areas is required to ensure all runoff is being captured as designed (CIA, Section 6.0, p. 3).

Recommended operational measures are set out in Section 7.0 of the CIA. The timely removal of snow and ice from internal roadways and pedestrian walkways is imperative, with snow to be stored at locations identified on the Winter Maintenance Plan during minor snowfall events and trucked off-site during major events (p. 4). Proper road salt application machinery will be required and calibrated to apply salt at a specified, controlled application rate, and tracking worksheets should be used to track overall usage of de-icing agents. Any contractors hired should be aware of appropriate guidelines and familiar with various application methods, rates, and salt management reduction practices (p. 4). A winter operations monitoring program should also be implemented to ensure the effectiveness of the Salt Management Plan, with results reviewed after each season to identify any deficiencies in existing operations and opportunities to make improvements (pp. 4–5).

The CIA concludes: “The implementation of this plan will help prevent the environmental impacts of excessive salt application and identify opportunities for more effective winter maintenance to ensure long term chloride reduction for this site” (Section 8.0, p. 5).

4.6 Transportation Impact Study

A Transportation Impact Study (“TIS”) has been prepared by Paradigm Transportation Solutions Limited (“Paradigm”) for the purpose of identifying and assessing potential traffic impacts from the Proposed Development on the surrounding road network. The TIS Report is dated June 2026.

According to the TIS, the townhouse development on Block 52 is forecast to generate 30 trips during each of the AM and PM peak periods, while Phases 4A and 4B together are

forecast to generate 194 AM peak-period trips and 247 PM peak-period trips and Phase 4C forecast to generate 153 AM peak-period trips and 192 PM peak-period trips (Section 3.2, pp. 16–17). The TIS addresses Phase 4C separately because that sub-phase will not be developed until jurisdiction over Victoria Street North has been transferred from the Province to the Region. Background traffic forecasts for 2035, 2040, and 2045 have been derived by applying a growth rate of 1% to existing roadway traffic volumes, which is consistent with the growth rate used for earlier phases of the Hopewell Crossing subdivision (TIS, Section 4.1.1, p. 22). For the purposes of projecting future traffic volumes, the TIS assumes that the future Breslau East Connector Road (through Phase 2 of Hopewell Crossing, west of Greenhouse Road) will have been completed by 2035 (TIS, Section 4.2.1, p. 25). Forecasts for the 2045 horizon year considers scenarios with and without the completion of the new Highway 7 north of existing Victoria Street North (TIS, Section 4.2.2, p. 25).

The assessment of total traffic conditions finds that study area intersections are forecasted to operate with similar levels of service as under background conditions, with the addition of critical movements, starting under 2035 conditions, at Victoria Street North (Highway 7) / Greenhouse Road and at Victoria Street North (Highway 7) / Shantz Station Road, with additional critical movements forecast at Victoria Street North (Highway 7) / Greenhouse Road under 2040 conditions and at Victoria Street North (Highway 7) / Shantz Station Road under 2045 conditions (TIS, Section 6.1, pp. 67–69). With the new Highway 7, study area intersections are forecast to operate with acceptable levels of service under 2045 background and total traffic conditions during both AM and PM peak hours (Section 6.1, p. 69).

With the new Highway 7, the TIS states it is unlikely that traffic signal control will be warranted at the Victoria Street North / Wambold Street intersection, though a westbound left-turn lane with 40 metres of storage will be warranted at that intersection (Section 6.1, p. 69). An eastbound left-turn lane is not warranted at the Kramp Road / Wambold Street intersection either with or without the new Highway 7 (Section 6.1, p. 69).

Based on these assessments, the TIS recommends that the Proposed Development be considered for approval as proposed, with no improvements to Victoria Street North being recommended at this time (Section 6.2, p. 70). The new Highway 7 is expected to add sufficient capacity to the network to make improvements to Victoria Street North unnecessary (Section 6.2, p. 70).

4.7 Noise Feasibility Study

The Noise Feasibility Study (“NFS”), which was prepared by HGC Noise Vibration Acoustics (“HGC”) for the purpose of assessing impacts from stationary and transportation noise sources, is dated May 20, 2026.

To address transportation noise impacts, the NFS states that central air conditioning will be required for all residential units in the mixed-use buildings on Blocks 55 and 56, and that any dwelling with exposure to Victoria Street North, Greenhouse Road, or the railway south of the Subject Lands will need to provide for the installation of air conditioning at the occupant’s discretion (Section 8, p. 23). The NFS also recommends that the mixed-use buildings be constructed with upgraded glazing with a minimum STC (Sound Transmission Class) rating of STC-35 for the north façades and STC-30 for the west and east façades (Table 9, p. 25), subject to a detailed review once actual window-to-floor area ratios are known (p. 23). This detailed review will be addressed for future Site Plan Applications that will be required before development on these two blocks may proceed. Finally, the NFS recommends that warning clauses be included in property and tenancy agreements to inform residents of traffic noise issues and the presence of the railway to the south (p. 24).

The stationary noise sources considered in the NFS relate to the two nurseries located adjacent to the Subject Lands, including impacts from mechanical equipment on the rooftops and façades, such as greenhouse exhaust fans, and noise generated by trucking movements and forklift activity (Section 4, p. 11). Stationary noise impacts affect proposed development on Medium-Density Residential Block 52, Street Townhouse Block 53, and Mixed-Use Commercial Block 55.

HGC’s impact assessment is based on worst-case (busiest-hour) scenarios for both daytime and nighttime operations (Section 4.2, pp. 15–16). The NFS presents three recommended mitigation options: two (Options 1a and 1b) that would achieve applicable Class 1 criteria for the adjacent residential uses, and another option (Option 2) that involves requesting a Class 4 designation for the dwellings adjacent to the nurseries (Section 4.4, pp. 18–20). Mitigation for a Class 4 designation would require upgraded building and glazing constructions, acoustic barriers along the property boundaries, the inclusion of air conditioning in the dwellings, additional warning clauses, and, for one of the proposed townhouse buildings on Block 52, ensuring there are no windows into noise-sensitive spaces (pp. 19–20).

Because of the potential for impacts from stationary noise sources on portions of the Proposed Development, the draft Zoning By-law Amendment in Appendix “B” to this Planning Justification Report includes holding provisions that require the submission of an updated noise report before the holding symbol may be lifted. It is anticipated that the updated report will be prepared during a future Site Plan Application process, once details regarding the design of development on the affected blocks have been confirmed.

5. Planning Policy Review & Analysis

5.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 (“PPS 2024”) came into effect on October 20, 2024, replacing both the previous Provincial Policy Statement, 2020 (which had come into effect on May 1, 2020) and the Growth Plan for the Greater Golden Horseshoe (which originally came into effect in 2006 and had been most recently amended on August 28, 2020). Under s. 3 (5) of the *Planning Act*, all planning-related decisions must be consistent with the PPS 2024.

Subsections 5.1.1 through 5.1.4 below address the relevant policies in each chapter of the PPS 2024, on a section-by-section basis (omitting sections that do not apply under the present circumstances). Appendix “D” to this report contains the exact wording of the policies discussed in those subsections. **Table 18**, at the end of Section 5.1 of this report (see p. 82), provides a summary of the discussion and analysis presented below.

5.1.1 Chapter 2: Building Homes, Sustaining Strong & Competitive Communities

The policies in Chapter 2 of the PPS 2024 focus primarily on growth management, housing, employment areas, and climate change impacts. Section 2.4 of the PPS 2024 contains policies regarding strategic growth areas (including major transit station areas and frequent transit corridors), while Sections 2.5 and 2.6 address rural areas and rural lands within municipalities and Section 2.7 addresses territory without municipal organization. None of the policies in those sections apply to the Subject Lands.

Planning for People & Homes (Section 2.1) — Section 2.1 directs municipalities to maintain sufficient land to accommodate “an appropriate range and mix of land uses to meet projected needs” for at least 20 years (No. 2.1.3), to maintain the ability to accommodate residential growth for at least 15 years on lands that are “designated and available” for residential development (No. 2.1.4.a), and to maintain land with servicing capacity “sufficient to provide at least a three-year supply of residential units” (No. 2.1.4.b). Policy No. 2.1.6 states that “planning authorities should support the achievement of complete communities” by accommodating an appropriate range and mix of land uses and housing options, by improving accessibility for people of all ages and abilities, and by “improving social equity and overall quality of life for people of all ages, abilities, and incomes.”

The Proposed Development has been designed to provide a diverse range of dwelling unit types and sizes, from single detached dwellings to apartment dwellings, and to incorporate compatible commercial uses on the two Mixed-Use Commercial blocks. Among other

things, providing a range of unit sizes helps to accommodate a greater range of income levels, and further supports aging-in-place for residents looking to “downsize.” The proposed dwelling units will have full municipal services, and the three-year increments in the draft Official Plan Amendment will assist the Township in achieving the requirements set by this section of the PPS 2024.

Housing (Section 2.2) — Section 2.2 further directs municipalities to “provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents” (No. 2.2.1) by “permitting and facilitating” all housing options “required to meet the social, health, economic and well-being requirements” of residents, by “promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation,” by establishing and implementing affordable housing targets, and by “requiring transit-supportive development and prioritizing intensification” in areas close to existing transit. (This last point does not apply to the Subject Lands, as there is no existing regular transit service in the area.)

As noted above, the Proposed Development will provide an appropriate range and mix of housing options that will contribute to addressing the needs of current and future Breslau residents, at densities that will make efficient use of land, infrastructure, and public service facilities. The diversity of unit sizes in the Proposed Development will provide options for a greater range of household incomes.

Settlement Areas (Section 2.3) — The policies in Section 2.3 of the PPS 2024 state that settlement areas (meaning “built-up areas where development is concentrated and which have a mix of land uses” along with “lands which have been designated in an official plan for development over the long term”) are to be focal areas for growth and development (No. 2.3.1.1), reinforcing direction from earlier sections about promoting efficient land use patterns that optimize existing and planned infrastructure (No. 2.3.1.2). Policies No. 2.3.1.3 and No. 2.3.1.4 focus on intensification and redevelopment within already built-up areas, and therefore do not apply to the Subject Lands. Policy No. 2.3.1.5 encourages planning authorities to establish density targets for designated growth areas, “based on local conditions,” while Policy No. 2.3.1.6 encourages the establishment and implementation of phasing policies to provide for orderly development that aligns with the timely provision of infrastructure and public service facilities. (Section 2.3.2 of the PPS 2024 addresses settlement area boundary expansions and the identification of new settlement areas, neither of which is being proposed through these development applications.)

The Subject Lands are located within an identified settlement area, having been included within the Breslau Urban Area since 2009 or earlier (see Section 1.3 above), and their development will contribute towards efficient land use and development patterns within the Breslau Urban Area and towards the achievement of a complete community. As discussed in Section 2.1 of this report, the Township's current Official Plan establishes density targets in terms of units per hectare (see p. 17 above) and in terms of people and jobs per hectare for designated growth areas (see p. 20), consistent with Policy No. 2.3.1.5 of the PPS 2024. The Proposed Development conforms with the Official Plan's housing density ranges (with the slight exceedance on Block 52 being addressed through the proposed Official Plan Amendment) and will achieve the minimum density target in terms of people and jobs per hectare.

Employment (Section 2.8) — Section 2.8.1 of the PPS 2024 establishes general direction for the promotion of economic development and competitiveness by planning authorities, including by “providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs” (No. 2.8.1.1.a), by “providing opportunities for a diversified economic base” (No. 2.8.1.1.b), by “identifying strategic sites for investment” (No. 2.8.1.1.c), by encouraging the intensification of employment uses (No. 2.8.1.1.d), and by “addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses” (No. 2.8.1.1.e). Land use compatibility is further addressed in Policy No. 2.8.1.3, which directs development on lands within 300 metres of an employment area to avoid, minimize, or mitigate “potential impacts on the long-term economic viability” of the employment area. The PPS 2024 defines “employment areas” as “those areas designated in an official plan for clusters of business and economic activities including manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities.” Institutional and commercial uses, “including retail and office not associated with the primary employment use,” are excluded from employment areas under this definition.

The abutting parcels to the west of the Subject Lands are zoned to permit employment land uses (“EM-5” and “EM-6”: see Figure 5 above). However, the existing nursery uses at 2615 Victoria Street North and 1787 Greenhouse Road are permitted under site-specific provisions in Section 16.21 and Section 16.23, respectively of the Township's Zoning By-law. In both cases, the specific use permitted is “the sale of nursery stock and garden supplies” (along with “uses accessory to the foregoing permitted use”) — that is to say, a retail commercial use, meaning that these areas are not considered “employment areas” as defined in the PPS 2024. Even so, the Proposed Development will implement measures to mitigate noise impacts from those existing uses on the proposed residential uses, to be implemented through Site Plan Control.

There is an existing industrial use located at 1747 Greenhouse Road (at the northeasterly angle of the intersection with Kramp Road). Impacts between this existing industrial use and the surrounding residential uses have already been addressed through the Hopewell Crossing subdivision agreement: Township Condition No. 22 required the completion of a stationary noise assessment prior to the registration of Phase 1 to demonstrate there would be no significant impacts (or, if there were impacts, to identify suitable mitigation measures). Township Condition No. 4.J.2 further requires that warning clauses regarding noise impacts from this existing use be registered on title “for all residential blocks within Phase 1 ... that are immediately adjacent.”

Section 2.8.2 of the PPS 2024 focuses on the designation and protection of employment areas, requiring that planning authorities “plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs” (No. 2.8.2.1). This includes protecting employment areas located near major goods movement facilities and corridors (No. 2.8.2.2), as well as protecting employment areas within settlement areas by prohibiting residential, commercial, institutional, and other sensitive land uses that are not ancillary to permitted employment uses and by “including an appropriate transition to adjacent non-employment areas” (No. 2.8.2.3).

Policy No. 2.8.2.5 establishes requirements for the proposed removal of lands from an employment area, requiring that it be demonstrated that:

- there is “an identified need for the removal and the land is not required for employment area uses over the long term” (No. 2.8.2.5.a);
- the proposed uses will avoid negative impacts on “the overall viability of the employment area” by avoiding, minimizing, or mitigating potential impacts on employment area uses and by “maintaining access to major goods movement facilities and corridors” (No. 2.8.2.5.b);
- the proposed uses can be accommodated by existing or planned infrastructure and public service facilities (No. 2.8.2.5.c); and
- the “municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan” (No. 2.8.2.5.d).

With regard to No. 2.8.2.5.b, potential impacts between proposed residential uses and existing uses on abutting properties have been addressed through the Hopewell Crossing subdivision agreement, or will be addressed through further measures to be implemented through a future Site Plan Application for development on the Subject Lands. The supporting studies discussed in Section 4 of this report address the requirement set out in No. 2.8.2.5.c of the PPS 2024.

The approval of these development applications would result in the conversion of approximately 20.32 hectares of currently designated employment land to accommodate non-employment uses. Under Policy No. 2.8.2.5 of the PPS 2024, the proposed removal of these lands from an employment area, which aligns with the Township's intent to re-designate the Subject Lands through the updated Breslau Settlement Plan (see Figure 7 above), requires a demonstration that the land is not required for employment uses, that the Township has sufficient employment lands to accommodate projected growth, and that there is a need for the removal.

The currently in-effect land use plan for the Breslau Urban Area (Schedule "B" to Chapter 7 of the Township's current Official Plan: see Figure 4 above) shows a total of approximately 100.49 hectares of land designated either "Employment Land I" or "Employment Land II": 20.32 hectares on the Subject Lands, 16.74 hectares on abutting parcels, 4.55 hectares on other blocks in the Hopewell Crossing subdivision, and 58.88 hectares at the south end of Breslau along Woolwich Street South and Fountain Street North.

The Preferred Land Use Plan for the Breslau Urban Area proposes to change the "Employment Land" designations of the Subject Lands, abutting parcels, and other blocks in Hopewell Crossing to a combination of "Low/Medium Residential" and "Medium/High Residential", which would result in the conversion of approximately 41.61 hectares of currently designated employment lands to non-employment designations. However, the Preferred Land Use Plan also proposes adding approximately 26.0 hectares of land designated either "Employment Land 1" or "Employment Land 2" along the Woolwich Street South / Fountain Street North corridor, plus another 18.3 hectares at the south end of Fountain Street North, 99.3 hectares southeast of the Region of Waterloo International Airport, and 315.1 hectares along Menno Street and Lonsdale Road, north of the airport. Overall, this will produce a net increase of approximately 417.1 hectares of employment land within the expanded boundaries of the Breslau Urban Area.

Furthermore, the Staff Report presented to Council with the Preferred Land Use Plan in February 2025 states that the plan needs to accommodate significant population growth within Breslau, from a 2021 population of approximately 5,151 people¹⁴ to an anticipated 14,000 people by 2051 and a projected long-term population of between 30,000 and 45,000 residents.

¹⁴ Adjusted based on an estimated net undercoverage rate of 1.91% for the Kitchener–Waterloo–Cambridge Census Metropolitan Area in the 2021 Census of Population.

The projected population growth in Breslau, combined with the net addition of employment lands through the updated Breslau Settlement Plan, clearly indicate that the Township will have sufficient employment areas to accommodate long-term growth and that there is a need for additional land to be designated for residential purposes, as proposed.

Energy Conservation, Air Quality & Climate Change (Section 2.9) — Policy No. 2.9.1 of the PPS 2024 directs planning authorities to reduce greenhouse gas emissions and prepare for the impacts of climate change through approaches that support the achievement of compact and complete communities (No. 2.9.1.a); incorporate climate change considerations into planning for and development of infrastructure, including stormwater management facilities (No. 2.9.1.b); support energy conservation and efficiency (No. 2.9.1.c); and promote green infrastructure, low-impact development, and active transportation (No. 2.9.1.d).

The Proposed Development has been designed to contribute towards the achievement of a compact and complete community by providing an appropriate mix of land uses and by making efficient use of available land. Climate change considerations have been incorporated into the design of the proposed SWM facility and other infrastructure, and the Proposed Development may incorporate low-impact development strategies to provide for lot-level infiltration, to be determined during the detailed design stage. The incorporation of sidewalks throughout the development will promote the use of active transportation. The dwellings themselves will be designed to support energy conservation and efficiency.

5.1.2 Chapter 3: Infrastructure & Facilities

Chapter 3 of the PPS 2024 focuses on matters including water and sewage services, transportation facilities, stormwater management, and public spaces. The policies in Section 3.7 (Waste Management) and Section 3.8 (Energy Supply) are not applicable to the present circumstances and have therefore been omitted from the discussion below.

Infrastructure & Public Service Facilities (Section 3.1) — Section 3.1 of the PPS 2024 sets out general policies regarding infrastructure and public service facilities, which are to be provided “in an efficient manner while accommodating projected needs” (No. 3.1.1) and should be “strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety” (No. 3.1.3). Policy No. 3.1.2 states that the use of existing infrastructure and public services should be optimized, and opportunities for adaptive re-use considered, before consideration is given to developing new infrastructure and public services.

The Proposed Development will be provided with water and sewage services in a manner that makes use of existing infrastructure, including the existing sanitary pumping station on Block 81 of the Hopewell Crossing subdivision, which has been designed to accommodate the development of the Subject Lands, ensuring that services can be provided efficiently while accommodating projected needs. The conditions of draft approval include provisions to ensure the effective delivery of emergency services, and the proposed SWM facility and other infrastructure will help protect public health and safety.

Transportation Systems (Section 3.2) — The policies in Section 3.2 address the provision of safe and energy-efficient transportation systems that facilitate the movement of people and goods (No. 3.2.1), that make efficient use of existing and planned infrastructure where feasible (No. 3.2.2), and that provide for connectivity “within and among transportation systems and modes” (No. 3.2.3).

The internal road network for the Proposed Development, including the proposed sidewalk network, provides for an appropriate level of connectivity while also balancing other important objectives (such as the protection and preservation of natural heritage features). Connectivity with Victoria Street North (currently Highway 7) will also take jurisdictional issues into appropriate consideration (namely, the need for an access permit from the appropriate authority). The design of the Mixed-Use Commercial blocks, to be confirmed through future Site Plan Applications, will incorporate appropriate measures to provide for the effective movement of people and goods within, as well as to and from, those blocks.

Transportation & Infrastructure Corridors (Section 3.3) — Section 3.3 requires planning authorities to “plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit, and electricity generation facilities and transmission systems” (No. 3.3.1) and to protect major goods movement facilities and corridors for the long term (No. 3.3.2). Planning authorities must not permit development in planned corridors that could “preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified,” and development adjacent to existing or planned corridors “should be compatible with, and supportive of, the long-term purposes of the corridor” (No. 3.3.3).

The right-of-way for the future Highway 7, approximately 350 metres north of the Subject Lands, meets the definition of a “planned corridor” in the PPS 2024. The Proposed Development will not preclude or negatively affect the use of that corridor for its identified purpose, and the location of future commercial uses within the Proposed Development, with frontage along Victoria Street North, will be compatible with and supportive of the planned function of the future Highway 7 and with the function of Victoria Street North after its transfer to the Region’s jurisdiction.

Airports, Rail & Marine Facilities (Section 3.4) — Policy No. 3.4.1 directs that “planning for land uses in the vicinity of airports, rail facilities and marine facilities” must be undertaken in a manner that protects those facilities’ long-term operations and economic role and that ensures these facilities and sensitive land uses will be adequately designed, buffered, or separated. Airports must be protected from “incompatible land uses and development” by prohibiting sensitive land uses in areas near airports that are above 30 NEF/NEP and by prohibiting land uses that could cause an aviation safety hazard (No. 3.4.2).

The Subject Lands are located approximately 3 kilometres north of the Region of Waterloo International Airport (“RWIA”), well outside the 25 NEF/NEP contour. The southerly portion of the Subject Lands (*i.e.*, the portion along Kramp Road to a depth of approximately 220–250 metres) are located within the Airport’s “outer surface,” which is described in Part 3 of the Schedule to the Region of Waterloo International Airport Zoning Regulations (“AZR”) under the *Aeronautics Act* (Canada) as “an imaginary surface established at a constant elevation of 45.000 m above the assigned elevation of the airport reference point” (except where this imaginary surface is less than 9 m above the surface of the ground, in which case “the outer surface is located at 9.000 m above the surface of the ground”). The assigned elevation of the airport reference point is defined in Subsection 1 (2) of the AZR as “311.500 m above sea level, Canadian Geodetic Vertical Datum - CGVD28, 1978 Adjustment,” which would therefore place the outer surface at an elevation of 356.500 m above sea level (“ASL”).

According to the RWIA’s online AZR mapping, the maximum elevation of the portion of the Subject Lands located within the outer surface is 325.00 m ASL, which translates to a maximum building height of 31.5 metres. For comparison, the maximum building height permitted in the “MU-2” zone is 16 metres, and the maximum height permitted in the “R-5” zone (the proposed zoning for this portion of the Subject Lands) is 12 metres for triplex or four-plex dwellings (where permitted) and 10.5 metres for all other low-rise forms of housing. No site-specific provisions are being proposed that would permit an increased maximum building height, and therefore the Proposed Development will be well below the height restriction imposed by the AZR.

Land Use Compatibility (Section 3.5) — Section 3.5 directs that “major facilities” and sensitive land uses “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” (No. 3.5.1). According to the definitions in the PPS 2024, “major facilities” include “airports, manufacturing uses, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and

transmission and distribution systems, and resource extraction activities.” Policy No. 3.5.2 further directs that, where avoidance is not possible, the long-term viability of major facilities must be protected by ensuring that adjacent sensitive land uses will only be permitted if impacts on the incoming sensitive use from existing major facilities are minimized and mitigated.

Measures will be implemented where necessary to ensure compatibility between the Proposed Development and existing land uses on abutting properties. The Proposed Development will not negatively affect the use of the Highway 7 corridor for its intended function (as discussed in relation to Section 3.3 of the PPS 2024 above), and will not impact the long-term operational and economic viability of the Region of Waterloo International Airport (as discussed in relation to Section 3.4).

Sewage, Water & Stormwater (Section 3.6) — Section 3.6 of the PPS 2024 establishes a hierarchy of options for providing water and sewage services, with municipal services being the preferred form in settlement areas wherever possible (No. 3.6.2). Planning for water and sewage services must “accommodate forecasted growth in a timely manner,” ensure that systems are sustainable and financially viable, protect human health and safety, and promote the conservation and efficient use of water and energy (No. 3.6.1). Planning for stormwater management must be integrated with planning for water and sewage services, must minimize or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads, minimize erosion and changes in water balance, maximize the extent and function of vegetative and pervious surfaces, and promote best practices (No. 3.6.8).

The Proposed Development will be provided with municipal water and sanitary sewer services, which are the preferred form of servicing under the PPS 2024. Planning for stormwater management within the Proposed Development has been integrated into planning for water and sewage services, and the proposed SWM facility has been designed to meet the requirements set out in Policy No. 3.6.8. The provision of water services will be coordinated with the Region to ensure that these services are sustainable by the resources upon which they rely.

Public Spaces, Parks & Trails (Section 3.9) — Policy No. 3.9.1 encourages the promotion of “healthy, active, and inclusive communities” by planning public streets, spaces, and facilities “to be safe, meet the needs of persons of all ages and abilities..., foster social interaction and facilitate active transportation” (No. 3.9.1.a) and by “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” (No. 3.9.1.b).

The Proposed Development includes one dedicated park block, as well as additional open space areas, that will provide outdoor settings for active and passive recreation. The proposed park will be accessible to people of all ages and abilities and integrated into the community using the proposed sidewalk network to support active transportation and foster social interaction.

5.1.3 Chapter 4: Wise Use & Management of Resources

Chapter 4 of the PPS 2024 contains policies regarding the protection and responsible management of natural heritage resources, water resources, prime agricultural areas, mineral resources, and cultural heritage resources.

Natural Heritage (Section 4.1) — Section 4.1 of the PPS 2024 requires that natural heritage features and areas be protected for the long term (No. 4.1.1), directing that the “diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved” (No. 4.1.2). Development and site alteration are not permitted in provincially significant wetlands (No. 4.1.4), and are only permitted in other significant features (such as significant woodlands, significant valleylands, and significant wildlife habitat) if it has been demonstrated there will be no negative impacts on natural features or their ecological functions (No. 4.1.5). Development and site alteration adjacent to significant natural features is only permitted if “the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions” (No. 4.1.8).

No development is being proposed in either of the wetland features located on the Subject Lands, and the Proposed Development has been designed to provide an appropriate buffer that will be naturalized using site-appropriate native trees and shrubs, which according to the EIS prepared by NRSI (see Section 4.1 above) will produce a net gain in natural cover. The placement of the proposed stormwater management facility (Block 66) between the two wetland features will contribute to the connectivity of these features. The EIS expects that the recommended mitigation measures will not only prevent negative impacts, but will in fact improve the overall natural conditions on the Subject Lands.

Additional field surveys, to be conducted in May–June 2026, will determine whether additional natural features or functions on the Subject Lands require protection, with any additional mitigation measures needed to be recommended in an Addendum EIS. The implementation of the recommended mitigation measures will ensure that the Proposed Development is fully consistent with the direction provided by Section 4.1 of the PPS 2024.

Water (Section 4.2) — Section 4.2 sets out policies whose purpose is to “protect, improve or restore the quality and quantity of water” (No. 4.2.1), including by directing planning authorities to implement “necessary restrictions on development and site alteration” in order to protect municipal drinking water sources and designated vulnerable areas and to “protect, improve or restore vulnerable surface and ground water, and their hydrologic function” (No. 4.2.1.e). Policy No. 4.2.2 further provides that development and site alteration is restricted “in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored.”

Parts of the Subject Lands are located within a Source Protection Area (WPSA 8), and Section 59 notices for both parcels have been provided as part of a complete application. According to Policy No. 8.A.18 of the ROP, within the “WPSA 8” designation, Category ‘A’ uses (“Very High Risk Uses,” such as waste treatment and disposal facilities or bulk storage of hazardous chemicals) are not permitted, and geothermal wells, mineral aggregate operations, and wayside pits and quarries may be permitted subject to further study.

The proposed methods for providing water and sanitary sewer services and the proposed stormwater management strategies set out in the FSR have taken into account the protection of water resources. This includes measures to provide an “Enhanced” level of protection for water quality, along with measures to provide the required level of quantity control (with specific low-impact development strategies to be proposed during the detailed design stage). The measures recommended in the EIS will be implemented to avoid impacts on the watercourse located on the Subject Lands.

Agriculture (Section 4.3) — The policies in Section 4.3 are meant to protect prime agricultural areas and other parts of the agricultural land base for long-term use for agriculture (No. 4.3.1.2); by limiting permitted uses in these areas to agricultural uses, agriculture-related uses, and on-farm diversified uses (No. 4.3.2.1), along with some limited non-agricultural uses (No. 4.3.5.1); by promoting and protecting “all types, sizes, and intensities of agricultural uses and normal farm practices” (No. 4.3.2.2); and by only allowing the removal of land from prime agricultural areas through the expansion or identification of a settlement area (No. 4.3.4.1).

The Subject Lands have been identified as part of the Breslau Urban Area since 2009, when the most recent version of the ROP was adopted. Because they are located within an identified settlement area, the Subject Lands are not considered to be prime agricultural lands or part of the agricultural land base more generally. One principal reason that the PPS 2024 directs development towards settlement areas is to provide for more compact and efficient development patterns, which contributes to preserving prime agricultural areas for

long-term agricultural use. The Proposed Development of the Subject Lands is therefore consistent with the direction provided in Section 4.3 of the PPS 2024.

Minerals & Petroleum (Section 4.4) — Section 4.4 directs that minerals (referring to both metallic and non-metallic minerals, but not mineral aggregate resources, which are addressed in Section 4.5 of the PPS 2024) and petroleum resources be protected for long-term use (No. 4.4.1.1). Policy No. 4.4.2.1 requires that mineral mining and petroleum resource operations be “identified and protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact.” Known mineral deposits, known petroleum resources, and significant areas of mineral potential must also be identified, and development in or near these areas that could “preclude or hinder the establishment of new operations or access to the resources” is strictly limited (No. 4.4.2.2).

There are no mineral or petroleum resources identified in the Township of Woolwich, and therefore the Proposed Development of the Subject Lands will not preclude or hinder access to, or the extraction of, such resources.

Mineral Aggregate Resources (Section 4.5) — Section 4.5 of the PPS 2024 addresses mineral aggregate resources using language very similar to that used in Section 4.4, directing that deposits of such resources be identified and protected for long-term use (No. 4.5.1.1). Lands within or adjacent to known deposits must be protected from development or other activities that would “preclude or hinder the establishment of new operations or access to the resources” (No. 4.5.2.5).

The nearest mineral aggregate resource area identified on Map 11.1 of the Township’s Official Plan is located near the intersection of Victoria Street North (Highway 7) and Shantz Station Road, approximately 500–600 metres east of the Subject Lands. Most of the lands on the south side of Victoria Street North between the Subject Lands and the identified resource area is occupied by a cemetery (the existence of which clearly precludes or hinders access to the resources in the area). There are no existing mineral aggregate operations in the vicinity of the Subject Lands. The Proposed Development will not preclude or hinder access to identified mineral aggregate resources or the establishment of new operations (certainly no more than existing land uses in the area already preclude or hinder such access), and is therefore consistent with the direction set out in this section of the PPS 2024.

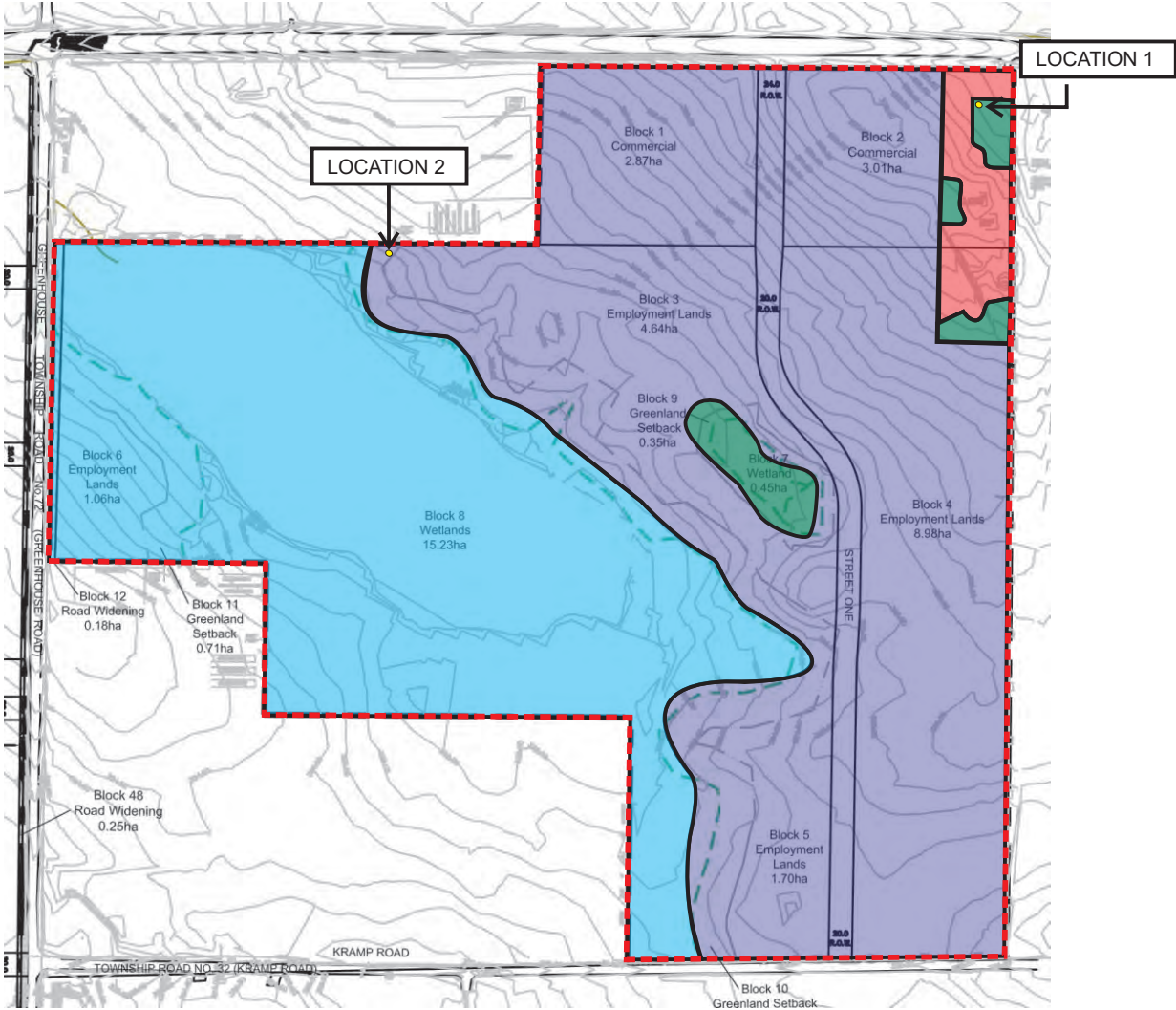
Cultural Heritage Resources & Archaeology (Section 4.6) — The policies in Section 4.6 require that protected heritage property (meaning property that is designated under the *Ontario Heritage Act*, that is part of a heritage conservation district designated under that

Act, or that is otherwise identified as having cultural heritage value and interest) and significant archaeological resources be conserved (No. 4.6.1 & No. 4.6.2). Development and site alteration are not permitted adjacent to protected heritage property unless the heritage attributes of the protected property will be conserved.

The Subject Lands do not contain any protected heritage property, nor are they situated adjacent to any protected heritage property. A Stage 1 & 2 Archaeological Assessment of the Subject Lands was undertaken in 2010–2011, in conjunction with the original Hopewell Crossing Subdivision development applications, with a field survey conducted on November 9, 2010, identifying two “findspots” (see **Figure 12**): one of Euro-Canadian cultural material (“Location 1” on Figure 12) and one of pre-contact Indigenous cultural material (“Location 2”). According to the Archaeological Assessment report produced by Golder Associates Ltd. (“Golder”), the investigation of Location 1 produced one positive test pit containing cultural material that was identified as a white clay pipe stem (Section 3.2.1, p. 14). Additional test pits around the positive test pit produced no additional cultural material: “Due to the low cultural heritage value or interest, this site was judged to be low and no further archaeological assessment is recommended for Location 1” (p. 14).

The investigation at Location 2 determined that “this site consists of a findspot of pre-contact cultural material,” namely one piece of Onondaga chert chipping detritus. According to the report, “chipping detritus is the waste material created during the production of chipped stone tools” and represents “the most frequently encountered indicator” of pre-contact site occupation (Section 3.2.2, p. 14): “Due to its relative frequency it has a low significance and interpretive value when only a small amount is recovered and it is not associated with any diagnostic material” (p. 14). The reduction of test pit intervals to one metre within a 20-metre radius of the findspot produced no additional archaeological material, and Golder’s report states that, “due to the low significance of an isolated non-diagnostic artifact, the cultural heritage value or interest was judged to be low and no further archaeological assessment is recommended for Location 2” (p. 15).

In accordance with the recommendations of the 2011 Archaeological Assessment, should any previously undocumented archaeological resources be discovered, all activities will cease to ensure that additional fieldwork is carried out in compliance with provincial statute, which will include engagement with the appropriate Indigenous community or communities. This will ensure that the proposed development remains consistent with the direction provided in Section 4.6 of the PPS 2024.



LEGEND

- STUDY AREA
- TEST PIT SURVEY AT 5 METRE INTERVALS
- PEDESTRIAN SURVEY AT 5 METRE INTERVALS
- POORLY DRAINED, NOT ASSESSED
- PREVIOUSLY DISTURBED, NOT ASSESSED
- ARCHAEOLOGICAL LOCATION, STAGE 3 NOT REQUIRED



Stage 2 Archaeological Field Assessment

Source: Golder Associates (2011)

Figure
12

5.1.4 Chapter 5: Protecting Public Health & Safety

The policies in Chapter 5 of the PPS 2024 are meant to ensure that development is “directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create any new or aggravate existing hazards” (No. 5.1.1).

Natural Hazards (Section 5.2) — The policies in Section 5.2 direct development away from hazardous lands that are impacted by flooding or erosion hazards (No. 5.2.2.b) and away from sites that could be unsafe due to other naturally occurring hazards, such as unstable soils or bedrock (No. 5.2.2.c). Development is not permitted in areas that “would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard” (No. 5.2.3.c). Development must also be directed away from “lands that are unsafe for development due to the presence of hazardous forest types for wildland fire” (No. 5.2.9).

The Subject Lands are not subject to any of the natural hazards addressed in Section 5.2, and therefore the Proposed Development is consistent with the direction provided in this section of the PPS 2024.

Human-Made Hazards (Section 5.3) — Section 5.3 restricts development on or adjacent to lands that are affected by mine hazards; by oil, gas, and salt hazards; or by former mineral mining operations, mineral aggregate operations, or petroleum operations (No. 5.3.1). Policy No. 5.3.2 requires that contaminated sites be “assessed and remediated as necessary prior any activity on the site associated with the proposed use.”

There are no human-made hazards on or adjacent to the Subject Lands, and therefore the Proposed Development is consistent with Section 5.3 of the PPS 2024.

5.1.5 Consistency with PPS 2024

Table 18 summarizes the discussion in the preceding subsections of this report, regarding the consistency of the Proposed Development with the PPS 2024. Based on that discussion and analysis, it is our opinion that a decision to approve the Proposed Development of the Subject Lands would be consistent with the Provincial Planning Statement, 2024, as required under s. 3 (5) of the *Planning Act*.

Table 18 – Consistency of Proposed Development with PPS 2024

Section of PPS 2024	Response Regarding Proposed Development
2.1 – Planning for People and Homes	The Proposed Development will provide a diverse range of dwelling units types and sizes along with compatible commercial uses. The three-year increments in the draft OPA will assist the Township in achieving the requirements established in this section of the PPS 2024.
2.2 – Housing	The Proposed Development will provide an appropriate range and mix of housing options to address the needs of current and future residents, at densities that make efficient use of land and infrastructure while also providing options for a greater range of household incomes.
2.3 – Settlement Areas	The Subject Lands are located within an identified settlement area. The Proposed Development conforms with the Official Plan's housing density ranges and will achieve the minimum density target.
2.8 – Employment	The Proposed Development will implement measures to mitigate noise impacts from existing uses, in addition to the incorporation of warning clauses. The proposed conversion of the Subject Land from employment to residential uses is justified, in that the Township will have sufficient employment land to accommodate projected growth and in that the proposed residential uses will help accommodate projected population growth in the Breslau Urban Area.
2.9 – Energy Conservation, Air Quality & Climate Change	The Proposed Development will contribute towards achieving a compact and complete community. The design of the SWM facility and other infrastructure has incorporated climate change considerations, and additional lot-level LID strategies may be implemented. The proposed dwellings will support energy conservation and efficiency.
3.1 – General Policies for Infrastructure & Public Service Facilities	The Proposed Development will be provided with services in a manner that makes use of existing infrastructure (including the Hopewell Crossing sanitary pumping station) and that will protect public health and safety.
3.2 – Transportation Systems	The internal road network provides for an appropriate level of connectivity (while balancing other important considerations, such as the protection of natural features). The Mixed-Use Commercial blocks will be designed to provide for the effective movement of people and goods.
3.3 – Transportation & Infrastructure Corridors	The Proposed Development will not negatively affect the use of the planned Highway 7 corridor and the location of future commercial uses will be compatible with and supportive of this corridor's planned function.
3.4 – Airports, Rail & Marine Facilities	The Subject Lands are located well outside the 25 NEF/NEP contour of the Region of Waterloo International Airport. Building heights will be well below the maximum height permitted under Airport Zoning Regulations.

Table 18 – Consistency of Proposed Development with PPS 2024 (continued)

Section of PPS 2024	Response Regarding Proposed Development
3.5 – Land Use Compatibility	Measures will be implemented where necessary to ensure compatibility between the Proposed Development and existing adjacent land uses.
3.6 – Sewage, Water & Stormwater	The Proposed Development will be provided with municipal water and sewage services, which is the preferred form of servicing under this section of the PPS. The SWM facility has been designed in a manner consistent with Policy No. 3.6.8.
3.9 – Public Spaces, Recreation, Parks, Trails & Open Space	The Proposed Development includes one dedicated park block, as well as additional open space areas, which will provide appropriate and accessible outdoor settings for active and passive recreation.
4.1 – Natural Heritage	The Proposed Development has been designed to provide appropriate buffering from the wetland features, producing a net gain in natural cover. Additional field surveys will determine whether any further mitigation measures are needed.
4.2 – Water	The implementation of measures and strategies recommended in the EIS and FSR will help ensure the protection of water resources.
4.3 – Agriculture	The Subject Lands are located within an identified settlement area, meaning that their development will be consistent with the direction provided in this section regarding the protection of prime agricultural areas.
4.4 – Minerals & Petroleum Resources	There are no mineral or petroleum resources identified in the Township of Woolwich.
4.5 – Mineral Aggregate Resources	The Proposed Development will not hinder or preclude access to identified resources or the establishment of new operations.
4.6 – Cultural Heritage Resources & Archaeology	The Subject Lands do not contain protected heritage property and are not adjacent to such property. A Stage 1–2 Archaeological Assessment investigated two find-spots and determined each as having low cultural heritage value or interest, with no further archaeological assessment recommended.
5.2 – Natural Hazards	The Subject Lands are not subject to flooding, erosion, or other natural hazards addressed in Section 5.2.
5.3 – Human-Made Hazards	There are no human-made hazards on or adjacent to the Subject Lands.

5.2 Township of Woolwich Official Plan

At the time these development applications were made, the Official Plan in effect for the Township of Woolwich was the Official Plan approved by the Region of Waterloo on June 22, 2022. As noted at the end of Section 1.3 above, the Township is currently in the late stages of the process of updating its Official Plan, including updated policies for the Breslau Urban Area.

The discussion in this section of the Planning Justification Report focuses on applicable policies in Chapter 5 (Planned Township Structure), Chapter 7 (Settlement Patterns), Chapter 9 (Housing), and Chapter 13 (Environmental Protection & Stewardship) of the Township's Official Plan.

As of January 2025, the Region of Waterloo is considered an “upper-tier municipality without planning responsibilities” under the *Planning Act*. However, under Section 70.13 of that Act, the Region's Official Plan remains in effect for the Township until such time as the Township revokes it or amends its own Official Plan to provide otherwise. Applicable policies from the Region's Official Plan (“ROP”) are therefore discussed in this section of the Planning Justification Report after the discussion of the Township's Official Plan proper.

5.2.1 Chapter 5: Planned Township Structure

Section 5.1 of the Official Plan establishes the Planned Township Structure, consisting of five areas (Urban Areas, Township Urban Areas, Rural Settlement Areas, Rural Employment Areas, and Countryside). As identified on Map 5.1, Breslau is part of the Urban Area designation, which is intended “to accommodate the majority of the Region's population and employment growth to 2031, with a focus on reurbanization and where permitted, mixed-use development” (No. 5.1.1). This section also notes that development in the Urban Areas is subject to the availability of municipal water and wastewater services “and other local planning considerations.”

Policy No. 5.4.1 establishes criteria that the Township will consider in its review of development applications in the Breslau Urban Area. Those criteria are presented in **Table 19** (on the following page), along with a brief explanation of how the Proposed Development addresses each applicable criterion.

Table 19 – Review Criteria for Urban Areas

Criterion	Response
a) Supports the Planned Township Structure defined in this Plan;	The Proposed Development supports the Planned Township Structure, which directs that the majority of growth be accommodated in Urban Areas.
b) Uses municipal water and wastewater systems unless otherwise identified in this Plan;	The Proposed Development will use municipal water and wastewater services.
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;	The Proposed Development has been designed to support the creation of a complete communities with densities and a mix of land uses that will support active transportation.
d) Protects the natural environment, surface water and ground water resources;	The Proposed Development will protect and enhance natural heritage features and water resources.
e) Conserves the cultural heritage resources and supports the adaptive reuse of historic buildings;	Not applicable: the Subject Lands do not contain any cultural heritage resources or historic buildings.
f) Respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;	Not applicable: the Subject Lands do not contain an established neighbourhood and are not located in a reurbanization area.
g) Facilitates residents' access to locally grown and other healthy foods into neighbourhoods;	The location of the Subject Lands will facilitate residents' access to locally grown foods.
h) Promotes building designs and orientations that incorporate energy conservation features and use of alternative and/or renewable energy systems.	The buildings in the Proposed Development will support energy conservation and efficiency, with specifics to be confirmed during the detailed design stages.

Section 5.7 of the Official Plan sets out general policies regarding development in the Township's designated greenfield areas, which (as explained in Policy No. 5.7.1) are identified on Map 5.3 and Map 5.4. Policy No. 5.7.2 establishes criteria for development proposals in the designated greenfield areas of the Breslau Urban Area, which are identified and addressed in **Table 20** below.

Table 20 – Criteria for Designated Greenfield Areas

Criterion	Response
a) Conform to the general development policies set out in Policy 5.4.	The Proposed Development conforms with the policies in Section 5.4: see Table 18 above.
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.	The Proposed Development includes a continuous network of sidewalks that provides linkages within the neighbourhood as well as to adjacent external roads.
c) Provide any required easements, land dedications and pedestrian amenities to support walking, cycling and existing or planned transit services for everyday activities.	No such easements have been identified at present.
d) Ensure that the design of the road network provides for direct and efficient transit routes within and between communities.	Breslau is not currently provided with fixed transit services. However, Wambold Street could support a direct and efficient transit route through the Proposed Development, should such services be established in the future.
e) Strive to locate land uses such that the distance to a transit stop is generally within a 450-metre walking distance.	There is currently no fixed-route transit serving the Breslau Urban area.
f) Discourage the use of noise attenuation walls and berms, where appropriate, through the use of passive noise attenuation measures.	The noise attenuation measures for blocks adjacent to existing uses, to be confirmed through future Site Plan Applications, will consider the appropriate use of passive noise attenuation measures instead of structural measures.

Policy No. 5.7.4.c) establishes a minimum density target of 55 people and jobs combined per hectare for new development “primarily serving a residential function” in the Breslau Urban Area. As discussed in Section 2.1 of this report, the Proposed Development exceeds this minimum density target.

Policy No. 5.7.5 states that the Township “will develop phasing policies ... to ensure a logical and orderly progression of development.” The proposed sub-phasing of this development into Phases 4A, 4B, and 4C of the Hopewell Crossing subdivision will support this policy direction, as will the staging policies incorporated into the draft OPA in Appendix “A”. Finally, Policy No. 5.7.6 provides for the Township to establish urban design guidelines for development in designated greenfield areas, which is addressed in Section 3.2 of this report.

5.2.2 Chapter 7: Settlement Patterns (Breslau Urban Area)

Chapter 7 of the Township’s Official Plan provides more detailed policy direction for development in the different areas making up the Planned Township Structure, as identified in Chapter 5, as well as specific policies for each settlement area. Policies for the Breslau Urban Area are contained in Section 7.26 of the Official Plan.

Growth Parameters —The “Growth Parameters” set out in Section 7.26.2.1 of the Official Plan include the statement that new development “shall be planned on the basis of full municipal sewer, water and stormwater management facilities” and an “appropriate transportation network” (No. 7.26.2.1.d). Policy No. 7.26.2.1.e) adds that “sanitary sewer services are to be provided through an additional wastewater capacity from the City of Kitchener’s sewage treatment system, by the Cross-Border Servicing Agreement with the City of Kitchener.” The servicing strategy for the Proposed Development is consistent with both of these statements.

General Staging — The “General Staging Objectives” in Section 7.26.2.2 reiterate the minimum density target of 55 people and jobs per hectare “within the designated greenfield areas (lands within Neighbourhood 1 and Neighbourhood 2 and those lands within the Commercial/Mixed Use designation),” and call for the provision of adequate municipal service infrastructure, the provision of “adequate community infrastructure such as educational, social and recreational facilities,” the “assurance that any new development is within the fiscal capabilities of the Township,” and “a level of growth that will protect the existing community from the negative effects of too much, or too rapid growth.”

The achievement of the minimum density target and the provision of municipal services have both been addressed multiple times in earlier sections of this report. The Proposed Development incorporates recreational and open space areas that are appropriate to the

scale and location of the development proposed. Section 3.4 of this report addresses matters relating to the Township's fiscal capabilities, while the staging provisions incorporated into the draft OPA will help ensure that the Proposed Development proceeds at an appropriate rate of growth.

Land Use-Specific Staging — Section 7.26.2.3 sets out staging policies for specific land uses. Policy No. 7.26.2.3.a) states that most new residential growth in Breslau “is expected to occur in designated greenfield areas, which will support a broader range of housing.” The Proposed Development incorporates a range of housing options, fulfilling the intent of this policy. Policy No. 7.26.2.3.b) sets out population growth limits for development in designated greenfield areas in three-year increments (from 2017 to 2044). While it is anticipated that these three-year limits will be revised through the currently ongoing process of updating the Township's Official Plan, the staging policies in the draft OPA are based on this same approach regarding new development.

Natural Heritage — Section 7.26.3 addresses the natural heritage system in Breslau, as identified on Schedule ‘A’ to Chapter 7 of the Township's Official Plan (see Figure 3 on p. 5 of this report). Natural features are designated “Environmental Protection” on Schedule ‘B’ to Chapter 7 (see Figure 4), policies for which are set out in Section 7.26.3.3 (with cross-references to other sections of the Official Plan). Aside from the boundary adjustments made to reflect the modified buffer on Block 79, discussed in Section 4.1.1 of this report, no changes to the “Environmental Protection” designation are being proposed through these applications. Such minor adjustments, made according to the recommendations of an EIS, conform with Policy No. 7.26.3.3.j) of the Township's Official Plan. No development is proposed on either of the wetland blocks or within their respective buffers.

Policy No. 7.26.3.3.l) defines all contiguous lands within 90 metres of a natural feature to be “adjacent lands” and requires that development applications regarding such lands be accompanied by an EIS. The buffer area to be established on Block 79 (currently occupied by cultivated agricultural field) will be managed and enhanced in conformity with Policy No. 7.26.3.3.o), which among other things requires the establishment of native, self-sustaining vegetation and habitat restoration. The Tree Preservation Plan required under Policy No. 7.26.3.3.r) is provided as Appendix IV to the EIS.

Residential Uses — Section 7.26.5 of the Township's Official Plan addresses the development of a range and mix of housing types in the Breslau Urban Area, using language that reflects the direction provided in Section 2.1 of the PPS 2024 (see Section 5.1.1 above). The policies in this section of the Official Plan cross-reference Sections 7.5.1.1, 7.5.1.2, and 7.5.1.3 for low-density, medium-density, and high-density residential uses, respectively.

Sections 7.5.1.1 and 7.5.1.2 establish density ranges of 12–20 units per gross hectare for low-density residential uses and 20–50 units per gross hectare for medium-density residential uses. As discussed earlier in this report (see Section 2.1, in particular Table 3, and Section 2.4.1), the expected density range for the proposed single detached dwellings is 14.5–19.0 units per gross hectare, and the expected density for the proposed townhouses is 25.3–31.0 units per gross hectare, both of which conform with the ranges stated in the Official Plan. The proposed density on the two Mixed-Use Commercial blocks is 55.7 units per net hectare, which conforms with the range of 50–120 units per net hectare set out in Section 7.5.1.3 of the Official Plan.

Sections 7.5.1.1–3 establish certain conditions for new residential uses of different densities. The following conditions apply to all densities (low, medium, and high):

- The site is adequate in size and configuration to accommodate on-site facilities and amenities (No. 7.5.1.1.d.i, No. 7.5.1.2.b.ii, and No. 7.5.1.3.b.ii) — Although many site-level elements will need to be confirmed through the detailed design process, the blocks proposed through the modifications to the Draft Plan have been sized to ensure that all residential uses will be located on lots or blocks of appropriate size and configuration.
- Transportation, utilities and service infrastructure can adequately serve the proposed development (No. 7.5.1.1.d.ii, No. 7.5.1.2.b.iii, and No. 7.5.1.3.b.iii) — The reports, plans, and studies submitted in support of these development applications demonstrate that the Proposed Development can be adequately provided with the necessary services. Details regarding utilities and services will be established and secured through conditions of draft approval.
- Community and neighbourhood amenities (such as parks, open spaces, recreational facilities, and institutional services) can adequately serve the proposed development (No. 7.5.1.1.d.iii, No. 7.5.1.2.b.iv, and No. 7.5.1.3.c.iv) — The Proposed Development incorporates a dedicated park block as well as ample open space areas. Further community and public service facilities are available in the wider Breslau Urban Area.

In addition to the above, new low- and medium-density residential uses are subject to the condition that proposed garages maintain an appropriate setback to the front property line “to allow sufficient parking on-site and to ensure that parking is not displaced onto the public road” (No. 7.5.1.1.d.iv and No. 7.5.1.2.b.v). Although elements such as garage placement will be confirmed through detailed design, the proposed “R-5A” and “R-6A” zoning means that the Proposed Development will be subject to regulations regarding garage setbacks.

New medium- and high-density residential uses are subject to the condition that the proposed development be compatible and sensitively integrated with surrounding land uses (No. 7.5.1.2.b.i and No. 7.5.1.3.b.i). The two proposed medium-density townhouse blocks are positioned to provide a transition between the Mixed-Use Commercial blocks and the lower-density residential development to the south, which will help the higher-density development along Victoria Street North integrate with the rest of the Proposed Development. Measures will also be implemented, either through conditions of draft approval or through future Site Plan Applications, to ensure compatibility with adjacent existing uses, as described earlier in this report.

Finally, No. 7.5.1.2.c) requires that townhouses “not be adjoined into groupings of more than 8 units to a row.” The townhouse blocks in the proposed development will be designed to conform with this requirement.

Mixed-Use Buildings — Section 7.26.5 of the Official Plan also cross-references Section 7.5.2.3 with respect to mixed-use buildings in the Breslau Urban Area. The following provisions apply to proposed mixed-use buildings:

- The building should be located on a lot with frontage on a Collector Road (No. 7.5.2.3.b.i) — In addition to having frontage on Victoria Street North, both proposed Mixed-Use Commercial blocks have frontage on Wambold Street, which is proposed as a Collector Road, as shown on Schedule ‘C’ to Chapter 7 of the Township’s Official Plan.
- No outdoor storage of goods, materials, equipment, or service vehicles is permitted unless the Zoning By-law provides otherwise (No. 7.5.2.3.b.ii) — Development on the Mixed-Use Commercial blocks will be subject to future Site Plan Applications. At this time, it is not anticipated that commercial uses on these blocks will require any outdoor storage.
- Activities associated with the business use must not create any undue adverse impacts for the surrounding community (No. 7.5.2.3.b.iii) — Development on the Mixed-Use Commercial blocks will be designed to ensure there are no adverse impacts on residential uses, as will be determined through future Site Plan Applications.
- The requirements of the Ontario Building Code must be satisfied (No. 7.5.2.3.b.iv) — All development proposed on the Subject Lands will comply with the Ontario Building Code.
- The building must comply with on-site parking requirements and other Zoning By-law regulations (No. 7.5.2.3.b.v) — Development on these blocks will comply with

all applicable zoning provisions, to be confirmed through future Site Plan Applications.

- The operator must obtain a permit from the Township to operate the business use (No. 7.5.2.3.b.vi) — The necessary permits will be obtained at the appropriate time.

Matters relating to permitted uses and development criteria in the “Low/Medium Density Residential” and “Medium/High Density Residential” designations, as set out in Section 7.26.6 of the Township’s Official Plan, have already been addressed in Section 2.4.2 of this report.

Transportation Network — The internal road network of the Proposed Development has been designed to generally adhere to a modified grid pattern, as required by Policy No. 7.26.8.1.b) of the Official Plan. Access to Victoria Street North from Wambold Street, whose alignment has already been approved through the existing Draft Plan, will be coordinated with the Region of Waterloo at the appropriate stage of development. The conditions of draft approval include a condition requiring that jurisdiction over Victoria Street North be transferred from MTO to the Region before Phase 4C may be registered and developed (unless MTO permits otherwise).

Servicing & Utilities — Policies for servicing and utilities in the Breslau Urban Area are set out in Section 7.26.8.2 of the Official Plan. The following policies in that section apply to the Proposed Development:

- All new development must be provided with municipal water and sewage services and stormwater management facilities (No. 7.26.8.2.a) — The Proposed Development will be provided with full municipal services, as detailed in the FSR.
- Sanitary sewer services are to be provided through capacity in the City of Kitchener’s sanitary system (No. 7.26.8.2.c), through the established Cross-Border Servicing Agreement between the City of Kitchener and the Township (No. 7.26.8.2.e) — The conditions of draft approval for the Hopewell Crossing subdivision, as well as the subdivision agreement, contain provisions regarding the provision of sanitary sewer services in a manner that conforms with these Official Plan policies.
- Sanitary sewer, water, and stormwater management systems should be designed to maximize efficiency and cost-effectiveness and to minimize the need for pumping stations (No. 7.26.8.2.f) — The proposed servicing systems have been designed to be efficient and cost-effective. The proposed sanitary sewer system uses the existing pumping station in the Hopewell Crossing subdivision and does not require the construction of a new pumping station.

- Conceptual locations for SWM facilities are shown on Schedule 'B' to Chapter 7, and the design of facilities must be consistent with the Urban Design + Architectural Control Guidelines in Appendix I to Chapter 7 (No. 7.26.8.2.g) — The proposed SWM facility on Block 66 generally aligns with the conceptual location shown on Schedule 'B'. The facility will be designed to be consistent with the Township's guidelines.
- Utilities (such as phone, gas, hydro, and cable) must be located to the satisfaction of the Township and the utility provider (No. 7.26.8.2.h) — The location and provision of utilities for the Proposed Development will be covered under the conditions of draft approval for the Hopewell Crossing subdivision.

Overall, the Proposed Development conforms with the policies in Chapter 7 of the Township's Official Plan.

5.2.3 Chapter 9: Housing

Chapter 9 of the current Official Plan sets out policies regarding the provision of a range and mix of housing options, as well as policies for housing in the Urban Areas.

Policy No. 9.2.1 states that the Township “will provide for a diverse range and mix of housing options” by, among other things, requiring that residential development on parcels larger than two hectares provide a minimum of 30% of dwelling units in forms other than single detached and semi-detached dwellings (No. 9.2.1.a). Based on the unit ranges in Table 4 (see p. 18), single detached dwellings are expected to represent between 35.3% and 43.3% of the dwelling units in the Proposed Development. If we exclude the units on Block 52, single detached dwellings will still represent between 39.0% and 47.3% of dwelling units in the easterly portion of the Proposed Development. In any case, the majority of dwelling units will be provided in forms other than single detached or semi-detached dwellings, in conformity with this policy.

The Proposed Development will also conform with Policy No. 9.7.1, which provides for the Township to control residential growth through staging “so as not to utilize the total sewage treatment plant capacity in the short term, and to address other growth-related issues to ensure the appropriate development of the community.” The staging of the Proposed Development is provided for through the sub-phasing of Phase 4 into Phases 4A, 4B, and 4C, as well as through the site-specific staging policies in the proposed OPA.

5.2.4 Chapter 13: Environmental Protection

The policies in Chapter 13 of the current Official Plan address various features, areas, and systems within the Township's natural heritage system. Map 13.1 indicates that the wetland

features on the Subject Lands are classified as “Supporting Environmental Features” (see **Figure 13**), which are covered under Section 13.9. According to Policy No. 13.9.1, Supporting Environmental Features “play an important role in maintaining the ecological functions provided by the Greenlands Network and will be maintained, enhanced or, wherever feasible, restored.” The implementation of the measures recommended in the EIS will help ensure that the features on the Subject Lands will continue to play such a role in the Proposed Development.

The policies in Section 13.9 of the Official Plan require that applications proposing development within or adjacent to a Supporting Environmental Feature include an Environmental Impact Statement demonstrating there will be no adverse environmental impacts on the features or their functions. Accordingly, the applications submitted for the Proposed Development include an EIS, discussed in Section 4.1 of this report. Most of the other policies in Section 13.9 address the identification of Supporting Environmental Features or determining those features’ boundaries.

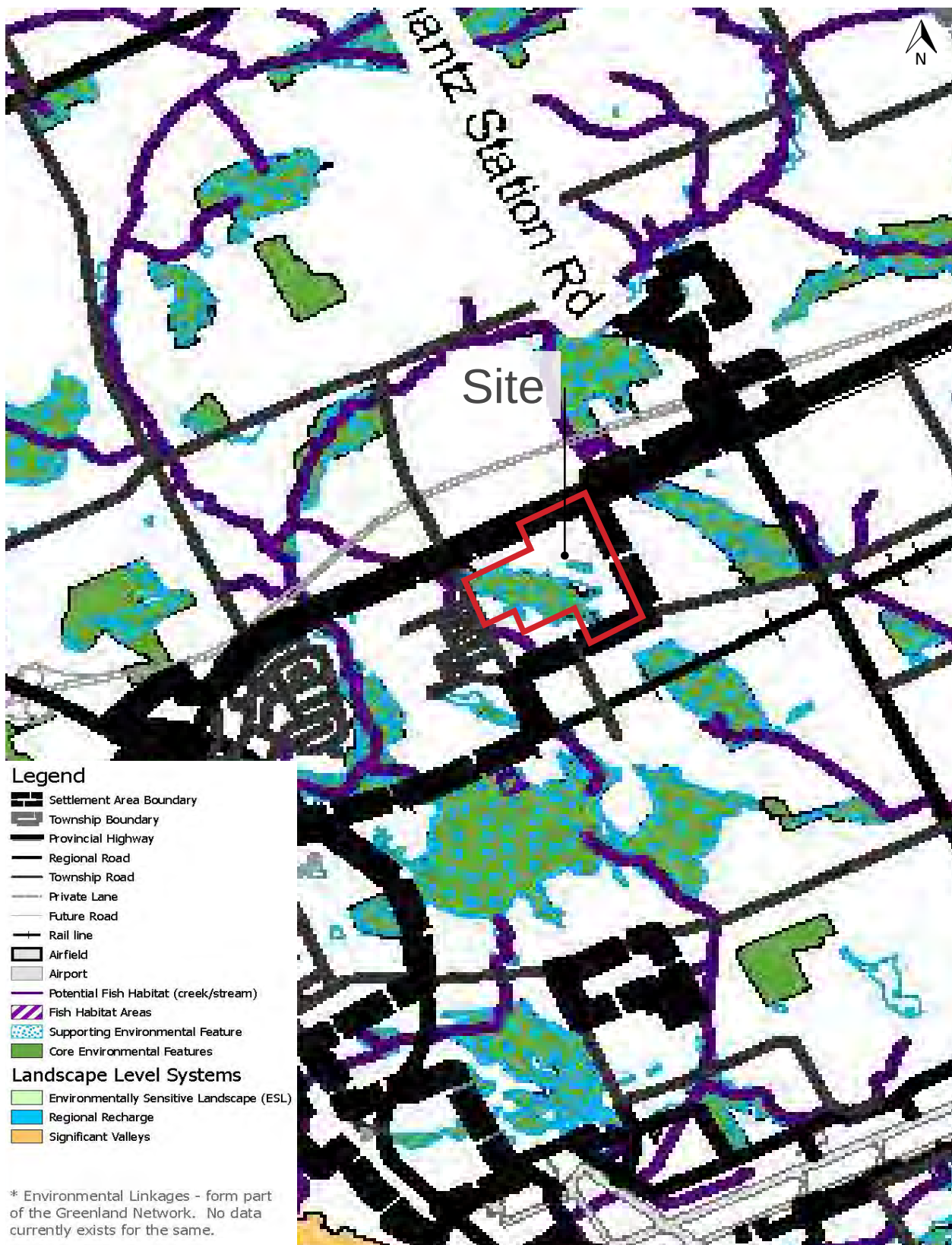
Section 13.16 of the Township’s Official Plan contains policies regarding source water protection, which is discussed below in connection with Section 8.A of the Region of Waterloo’s Official Plan.

5.2.5 Source Water Protection (Region of Waterloo Official Plan)

As noted at the start of Section 5.2, the Region of Waterloo has been classified as an “upper-tier municipality without planning responsibilities” as of January 2025. However, under Section 70.13 of the *Planning Act*, the Region’s Official Plan (“ROP”) remains in effect for each of its lower-tier municipalities until the municipality in question revokes the ROP or amends their own Official Plan to provide otherwise.

The discussion below focuses on policies regarding source water protection in Chapter 8 of the ROP, as most other matters are covered by the policies of the PPS 2024 or the Township’s Official Plan and are therefore discussed elsewhere in this report. References to the ROP in this section are to the October 2024 consolidation, which is the version that was in effect immediately prior to the removal of planning responsibilities from the Region.

Map 6b of the ROP (**Figure 14**) indicates that portions of the Subject Lands are within a “Wellhead Protection Sensitivity Area-8” (“WPSA-8”), which according to ROP Policy No. 8.A.10.h “delineates the area outside of the ten year time of travel to the limit of the total land area contributing water to a municipal drinking-water supply well.”

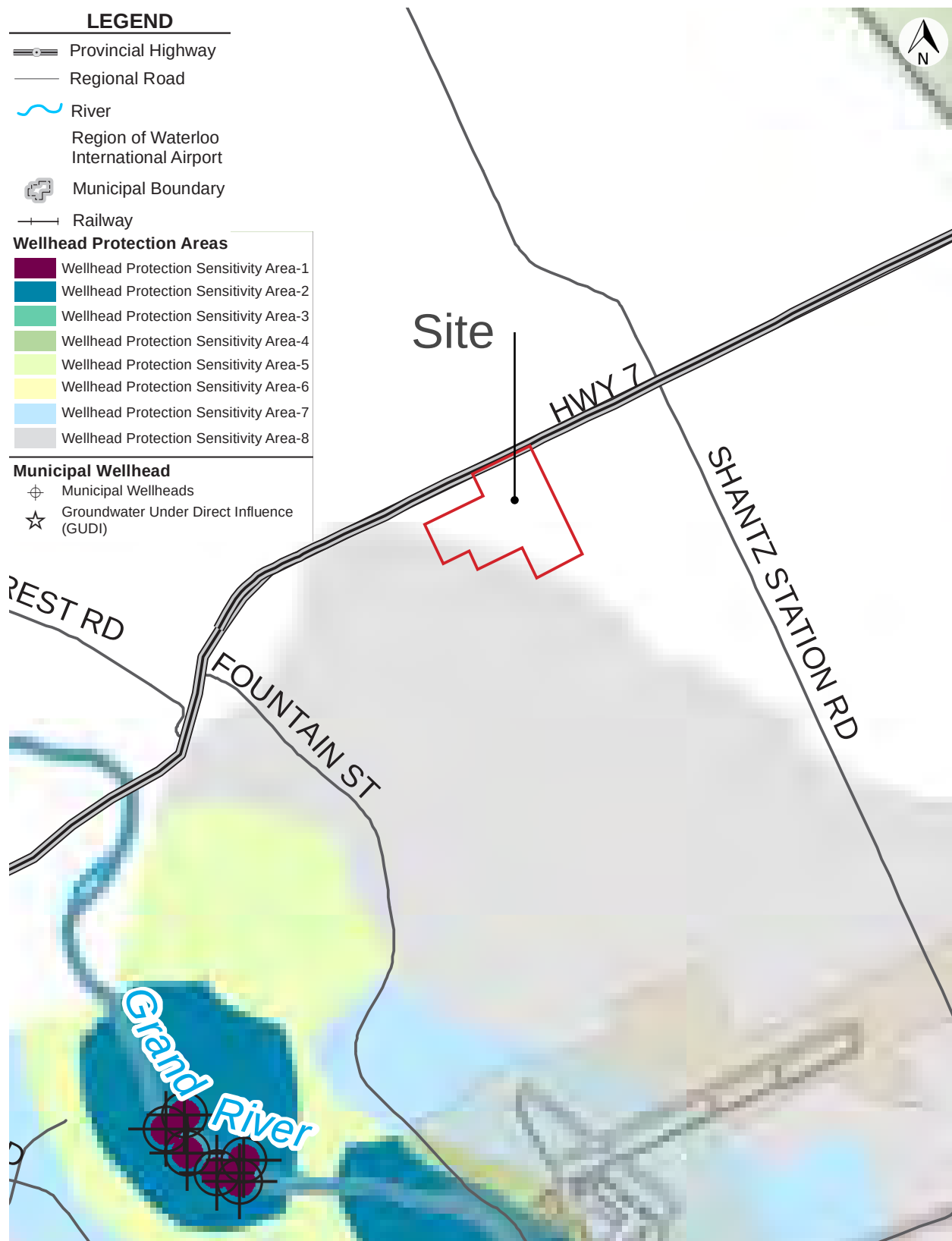


Township of Woolwich Greenland Network
(Official Plan, Map 13.1)

Source: Township of Woolwich Official Plan Map 13.1,
Township of Woolwich Greenland Network (2022)

Figure

13



ROP Policy No. 8.A.18 states that, within the WPSA-8 designation, Category 'A' ("Very High Risk") land uses will not be permitted, and "geothermal wells, mineral aggregate operations and wayside pits and quarries may be permitted subject to further study in accordance with Policy 8.A.4." Schedule B to the ROP lists three items under "Category 'A'": "Waste treatment and disposal facilities, including lagoons, landfills, communal/municipal sewage treatment facilities and including large sewage vaults at sewage pumping stations, but not including facilities regulated under the *Nutrient Management Act*"; "Salvage yards, including automobile wrecking yards or premises"; and "Bulk storage of hazardous chemicals and hazardous substances (as listed in O.Reg. 347 under the *Environmental Protection Act*), including bulk storage of oil, gasoline or petroleum products, and including transportation terminals for these substances/chemicals (including truck/trailer/container parking, washing or cleaning depots)." None of these land uses is being proposed through these development applications.

Policy No. 8.B.3 of the ROP requires the submission of a Salt Management Plan with certain types of development applications, including applications proposing "new employment uses and multiple unit residential development." This requirement is covered under Region Condition No. 36 of the conditions of draft approval for Hopewell Crossing, which requires the completion of a Salt Management Plan before Site Plan approval is given. The proposed modifications in Appendix "C" include modifications to this condition that require a Salt Management Plan before the development of Mixed-Use Commercial Blocks 55 and 56.

5.2.6 Conformity with Township's Official Plan

Based on the discussion and analysis presented in this section of the Planning Justification Report, it is our opinion that the Proposed Development conforms with the policies of the Township of Woolwich's current Official Plan, including the applicable policies of the ROP, as it read immediately before the removal of planning responsibilities from the Region.

6. Summary & Conclusion

Three development applications (Official Plan Amendment, Zoning By-law Amendment, and Modifications to Draft Plan of Subdivision) have been submitted to facilitate the development of a mix of residential and commercial uses on two parcels of land occupying a total of approximately 43.07 hectares at 2699 Victoria Street North and Greenhouse Road in the Breslau Urban Area in the Township of Woolwich. The Proposed Development will contain an anticipated 545–624 dwelling units of varying types and sizes along with 1,400 m² of commercial floor space.

The Subject Lands are located within the larger Hopewell Crossing subdivision (Draft Plan 30T-11701), which received draft approval in May 2016. The Subject Lands are currently identified as Employment Lands on Draft Plan 30T-11701. Modifications to the Draft Plan and associated conditions are being requested in order to accommodate the proposed uses.

The Subject Lands contain two wetland features, with a combined area of approximately 15 hectares. No development is being proposed within either feature, which will be protected by buffer areas that, once implemented, will provide a “substantial gain in natural cover,” according to the EIS prepared in support of these development applications.

The Proposed Development is consistent with the PPS 2024 and conforms with the Township’s current Official Plan, including those portions of the Region of Waterloo’s Official Plan that remain in effect for the Township. Overall, we are confident in saying that the Proposed Development of the Subject Lands represents good planning that is in the public interest.

Respectfully submitted on behalf of Thomasfield Homes Ltd. to the Township of Woolwich.



Hugh Handy, MCIP, RPP
Vice President, GSP Group



Patrick Casey
Planner, GSP Group

Appendix “A” – Draft Official Plan Amendment

The Corporation of the Township of Woolwich

By-law No. #-2026

A By-law to adopt Amendment No. # to the Official Plan of the Township of Woolwich (Thomasfield Homes, 2699 Victoria Street North & Greenhouse Road)

The Council of the Corporation of the Township of Woolwich, in accordance with the provisions of Section 21 of the *Planning Act* (R.S.O 1990, c. P.13), as amended, hereby ENACTS AS FOLLOWS:

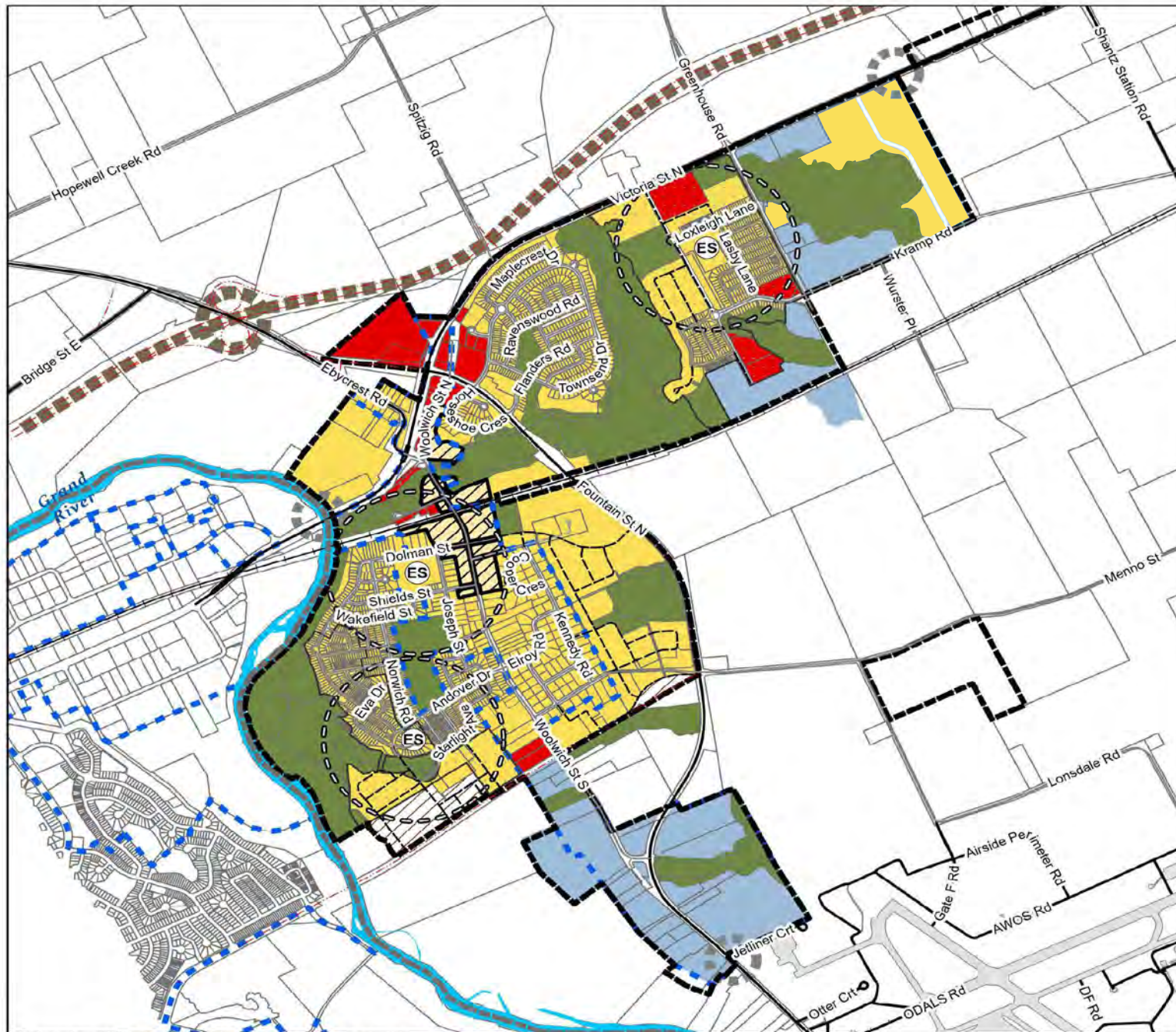
1. That Amendment No. # to the Official Plan of the Township of Woolwich consisting of the attached text and mapping is hereby adopted.
2. That the Clerk is hereby authorized and directed to make application to the Ontario Minister of Municipal Affairs and Housing for approval of Amendment No. # to the Official Plan of the Township of Woolwich.
3. That this By-law shall come into force and take effect on the day of its final passing.

Passed this __th day of [month], 2026.

Mayor

Clerk

By signing this by-law on the date it is passed, Mayor Sandy Shantz will not exercise the power to veto this by-law.



Schedule A Township of Woolwich Urban Area Settlement Plan Breslau - Urban Structure

Legend

- Township Boundary
- Provincial Highway
- Regional Road
- Township Road
- Private Lane
- Proposed New Subdivision Road
- Rail line
- Airport
- Settlement Area Boundary
- Neighbourhoods 1 + 2
- 5 Minute Walking Radius
- Built Boundary
- Proposed Provincial Hwy & Interchange
- Elementary School
- Gateway
- Village Main Street
- Natural Heritage Framework
- Retail/Commercial Areas
- Employment Areas
- Residential Neighbourhoods
- Property Boundary
- Future Road
- Future Urban Area

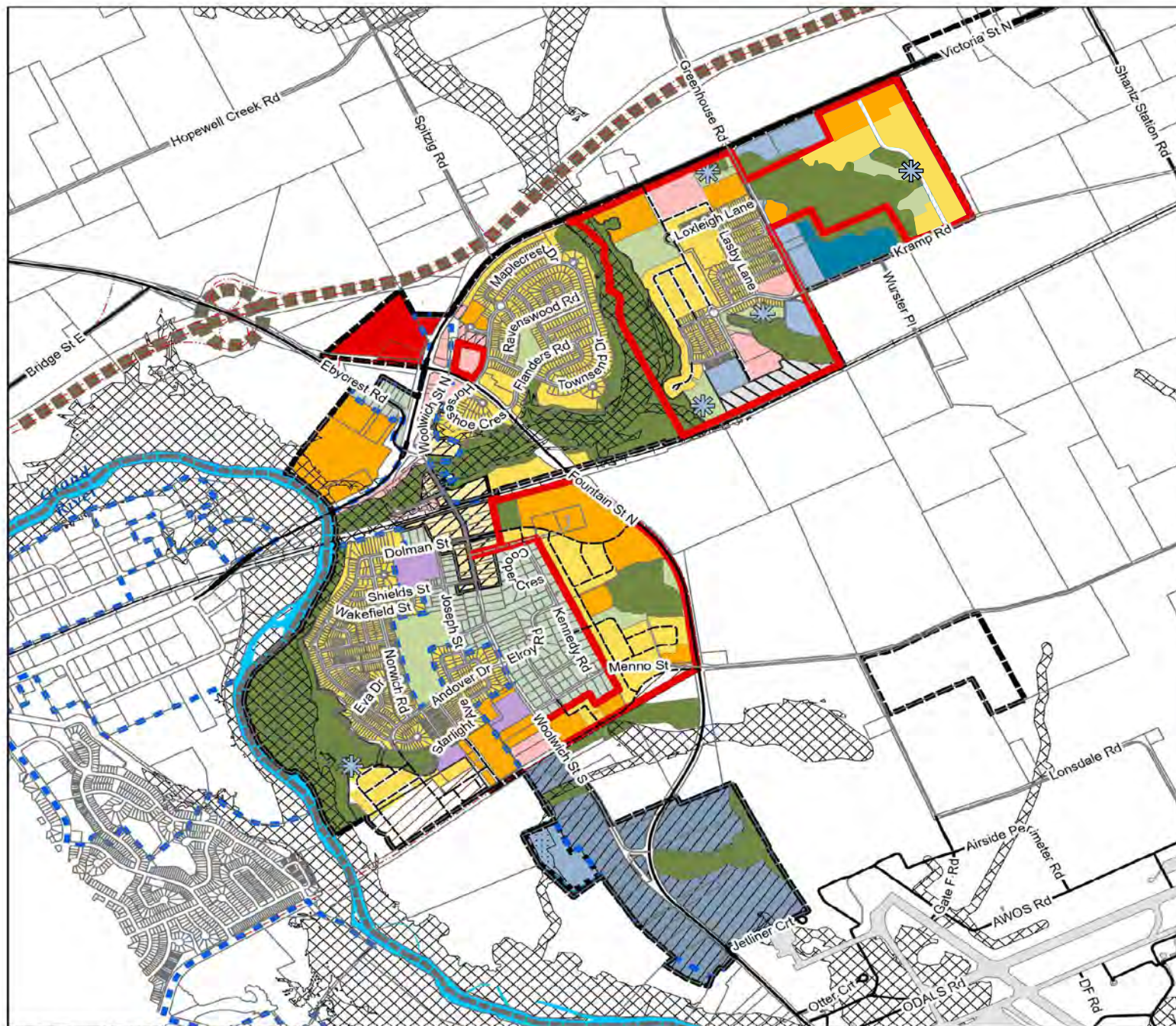


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Township of Woolwich
2022

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Schedule B Township of Woolwich Urban Area Settlement Plan Breslau - Land Use Plan

Legend

- Township Boundary
- Provincial Highway
- Regional Road
- Township Road
- Private Lane
- Proposed New Subdivision Road
- Rail line
- Airport
- Settlement Area Boundary
- Stormwater Management Facility
- Neighbourhoods 1 + 2
- Built Boundary
- Proposed Provincial Hwy & Interchange
- Site Specific Special Policy Areas
- Safety Klean Restricted Area
- Safety Klean Industrial
- Natural Hazards
- Open Space / Recreational
- Environmental Protection
- Proposed GO Station
- Employment Land I
- South Breslau Industrial Area
- Employment Land II
- Commercial/Retail
- Commercial/Business Park
- Commercial/Mixed Use
- Institutional
- Village Main Street
- Low/Medium Density Residential
- Medium/High Density Residential
- Village Residential
- Property Boundary
- Future Road
- Future Urban Areas

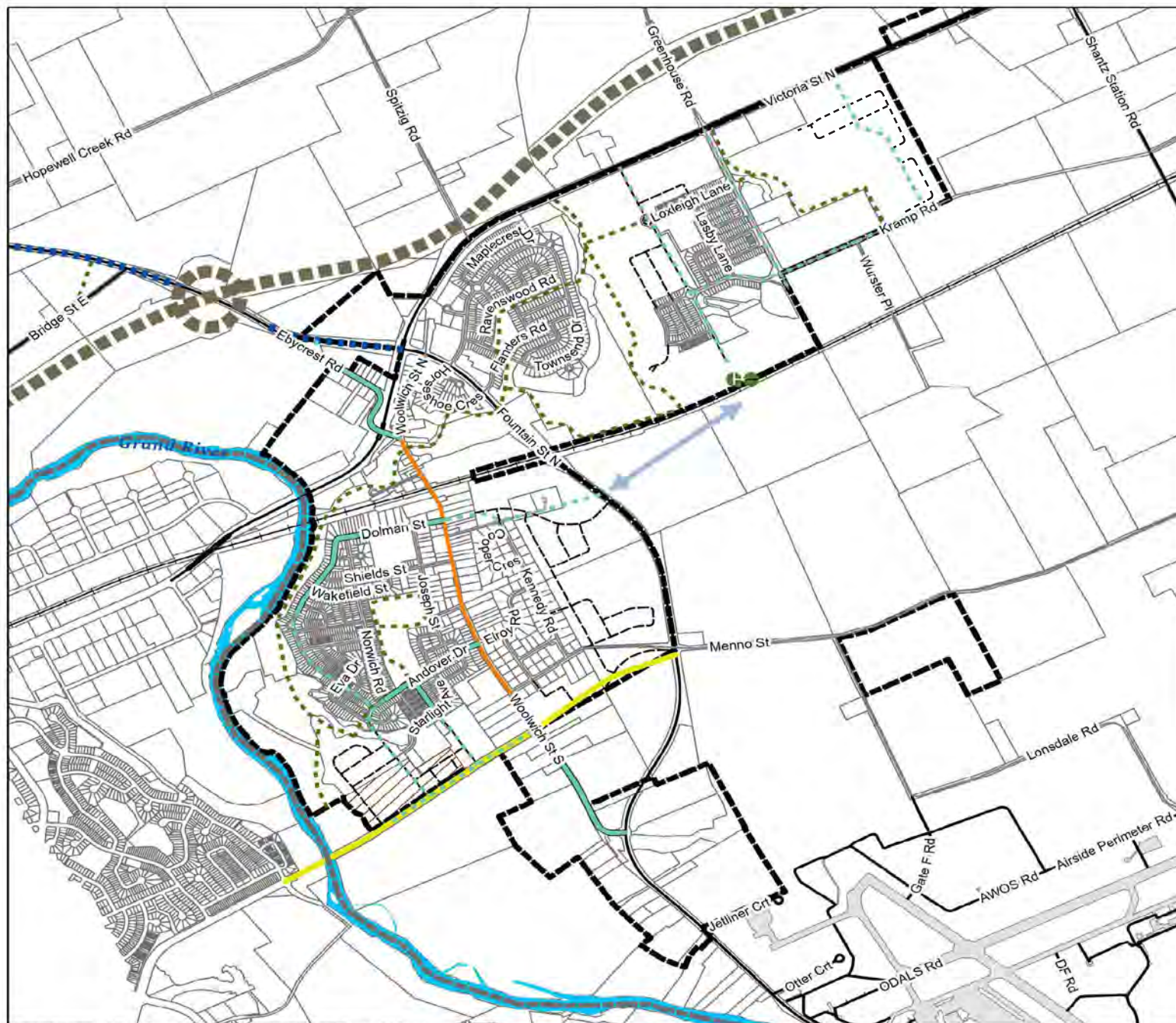


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Township of Woolwich
2023

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Schedule C Township of Woolwich Urban Area Settlement Plan Breslau - Transportation Network

Legend

- Proposed Go Station
- Proposed Collector Road
- Proposed Provincial Hwy & Interchange
- Proposed Regional Road
- Proposed Regional Corridor
- Collector Road
- Main Street
- Potential Connecting Corridor
- Conceptual Trails and Pathway System
- Future Urban Area
- Property Boundary
- Airport
- Provincial Highway
- Regional Road
- Township Road
- Private Lane
- Proposed New Subdivision Road
- Rail line
- Township Boundary
- Settlement Area Boundary



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Township of Woolwich
2022

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TOWNSHIP OF WOOLWICH OFFICIAL PLAN AMENDMENT

PART A – PREAMBLE

The purpose of this Amendment is:

1. to change the designation of two parcels of land in the Breslau Settlement Area (the “Subject Lands”) on Schedule ‘A’ to Chapter 7 from “Employment Areas” to “Residential Neighbourhoods”;
2. to change the land use designation of the Subject Lands on Schedule ‘B’ to Chapter 7 from a combination of “Employment Land I” and “Employment Land II” to a combination of “Low/Medium Density Residential” and “Medium/High Density Residential”;
3. to add the roads proposed through modifications to a Draft Plan of Subdivision that includes the Subject Lands to Schedule “C” to Chapter 7; and
4. to amend certain site-specific policies that presently apply to the Subject Lands.

LOCATION

This Amendment applies to two parcels of land located within the Hopewell Crossing Subdivision (Draft Plan 30T-11701) occupying a combined total of 43.07 hectares, being the parcel known by the municipal address of 2699 Victoria Street North (the “Phase 4 Lands”), with an area of 42.04 hectares, and the parcel described legally as Block 124 of Plan 58M-657 (“Block 124”), with an area of 1.03 hectares, located in the Breslau Settlement Area.

BASIS OF THE AMENDMENT

This Amendment is made pursuant to a request made under Section 22 of the *Planning Act* (R.S.O. 1990, c. P.13). The changes to the land use designations that apply to the Subject Lands conform with the Preferred Land Use Plan for the Breslau Settlement Area endorsed by Council on February 18, 2025.

PART B – THE AMENDMENT

The Amendment consists of the following components:

1. That Schedule “A”: Township of Woolwich Urban Area Settlement Plan, Breslau - Urban Structure to Chapter 7.26 be deleted and replaced by the Plan attached as Schedule “A” to this By-law for the purpose of:
 - a) redesignating Block 124 with an area of 1.03 hectares from “Employment Areas” to “Residential Neighbourhoods”;
 - b) redesignating those portions of the Phase 4 Lands currently designated “Employment Areas”, with an area of 19.29 hectares, from “Employment Areas” to “Residential Neighbourhoods”; and
 - c) redesignating certain other portions of the Phase 4 Lands with an area of 1.16 hectares from “Natural Heritage Framework” to “Residential Neighbourhoods”.

2. That Schedule "B": Township of Woolwich Urban Area Settlement Plan, Breslau - Land Use Plan to Chapter 7.26 be deleted and replaced by the Plan attached as Schedule "B" to this By-law for the purpose of:
 - a) redesignating Block 124 with an area of 1.03 hectares from "Employment Land I" to "Medium/High Density Residential" subject to site-specific policies set out in Section 7.26.10.1;
 - b) redesignating certain portions of the Phase 4 Lands with an area of 4.70 hectares from "Employment Land I" to "Medium/High Density Residential" subject to site-specific policies set out in Section 7.26.10.1;
 - c) redesignating the remaining portions of the Phase 4 Lands currently designated "Employment Land I" with an area of 1.15 hectares from "Employment Land I" to "Low/Medium Density Residential" subject to site-specific policies set out in Section 7.26.10.1;
 - d) redesignating certain portions of the Phase 4 Lands with an area of 0.007 hectares from "Employment Land II" to "Medium/High Density Residential";
 - e) redesignating the remaining portions of the Phase 4 Lands currently designated "Employment Land II" with an area of 12.37 hectares from "Employment Land II" to "Low/Medium Density Residential" subject to site-specific policies set out in Section 7.26.10.1; and
 - f) redesignating certain other portions of the Phase 4 Lands with an area of 1.16 hectares from "Environmental Protection" to "Low/Medium Density Residential".
3. That Schedule "C": Township of Woolwich Urban Area Settlement Plan, Breslau - Transportation Network to Chapter 7.26 be deleted and replaced by the Plan attached as Schedule "C" to this By-law for the purpose of identifying Street 'N', Street 'O', Street 'P', Street 'Q', Street 'R', and Street 'S' on Draft Plan 30T-11701, as modified, as "Proposed New Subdivision Roads".
4. That Section 7.26.10.1 of the Official Plan be amended:
 - a) by striking out "and" at the end of Sub-clause 7.26.10.1.a).ii) and inserting the following sub-clauses after Sub-clause 7.26.10.1.a).iii):
 - iv) Year 2026 to 2028 – totalling 225 units or 75 units per year; and
 - v) Year 2029 to 2031 – totalling 137 units or 75 units per year.
 - b) by striking out "Notwithstanding Sections 7.5.1.1 a) and 7.26.5.6 b) of this Plan" at the start of Clause 7.26.10.1.b) and substituting "Notwithstanding Sections 7.5.1.1 a) and 7.26.5.6 b) (with respect to low-density residential uses) and Sections 7.5.1.2 a) and 7.26.5.6 c) (with respect to medium-density residential uses) of this Plan".
 - c) by striking out "lands designated Commercial/Mixed-Use with frontage on Highway 7 (Victoria Street)" in Clause 7.26.10.1.e) and substituting "lands designated Commercial/Mixed-Use with frontage on that portion of Highway 7 (Victoria Street) located west of Greenhouse Road"; and
 - d) by deleting Clause 7.26.10.1.g).

Appendix “B” – Draft Zoning By-law Amendment

The Corporation of the Township of Woolwich

By-law No. #-2026

A By-law to further amend Zoning By-law 26-2024 of the Township of Woolwich (2699 Victoria Street North & Greenhouse Road)

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

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF WOOLWICH HEREBY ENACTS AS FOLLOWS:

1. That Map 28 of Schedule 'B', which forms part of By-law 26-2024, as amended, be deleted and replaced by the Map attached as Schedule 'A' to this By-law, in order to change the zoning of certain portions of the property known as 2699 Victoria Street North and described as Part of Lots 105 and 106, German Company Tract, Waterloo, being Part of Part 1 on 58R-15960, and to change the zoning of the property described as Block 124 of Plan 58M-657 as shown on Schedule 'A' attached hereto.
2. That the plan forming Section 16.233 of Schedule 'A' to By-law 26-2024, as amended, be deleted and replaced by the Plan attached as Schedule 'B' to this By-law.
3. That Schedule 'A' to By-law 26-2024, as amended, be further amended by adding the new Section 16.###, attached as Schedule 'C' to this By-law.
4. That Section 16.233 of By-law 26-2024, as amended, be further amended by deleting Subsection 16.233.B.a), Subsection 16.233.B.b), and Subsection 16.233.C.b).
5. That Section 16 of By-law 26-2024, as amended, be further amended by adding the following new sub-section:

Hopewell Crossing Subdivision (Phase 4)

- 16.### Notwithstanding any other provision of this By-law, the lands illustrated on the plan forming Section 16.### of Schedule 'A' to this By-law (the "Plan") may be used for the following specific uses

in addition to the uses permitted in the zone or zones within which the parcel lies:

- a) Townhouse – Back-to-Back

Subject to the following:

A. Special Provisions for Back-to-Back Townhouses

- a) That one or more stand-alone townhouse back-to-back buildings may be permitted on a property in the MU-2 zone, subject to the following regulations:
 - i) that the development of stand-alone townhouse back-to-back building(s) shall only be permitted if a permitted non-residential use listed in Section 8.1 a) of this By-law for the MU-2 zone is developed on the same property;
 - ii) that the regulations in Sections 8.9 b) and 8.9 c) shall apply to the non-residential use(s) noted in i) above;
 - iii) that the stand-alone townhouse back-to-back building(s) shall be located to the rear of the building containing the non-residential use(s) noted in i) and ii) above; and
 - iv) that in addition to the above, the stand-alone townhouse back-to-back building(s) shall comply with the regulations in b), c), and d) below;
- b) That the regulations in Section 7.7 shall apply to any stand-alone townhouse back-to-back building permitted in the MU-2 zone under a) above, subject to c) and d) below;
- c) That, for the purposes of b) above, where a stand-alone townhouse back-to-back building does not front/face directly onto a public road, the Minimum Building Line Setback means the setback from the closest point where the pavement of an internal road begins; and
- d) That all buildings on a property in the MU-2 zone shall cover no more than 60% of the total lot area, subject to the definition of “Maximum Lot Coverage” in Section 3 that lists the buildings and structures that are exempt.

B. Special Lot and Setback Provisions

- a) That the Minimum Building Line Setback to a property line adjacent to Victoria Street North for all buildings, structures,

and stormwater management facilities shall be 14 metres, if Victoria Street North is under the jurisdiction of the Province of Ontario; and

- b) That the Minimum Building Line Setback to a property line adjacent to Victoria Street North for all buildings, structures, and stormwater management facilities shall be 6 metres, if Victoria Street North is under the jurisdiction of the Regional Municipality of Waterloo.

C. Holding Provisions

- a) That residential development shall not be permitted on the lands within the Plan identified with an “R-6 (H1)” symbol, until Council or its delegate (as the case may be) has, by by-law, removed the holding symbol (H1) from the subject lands pursuant to Section 36 of the *Planning Act* (R.S.O. 1990, c. P.13). The removal of the (H1) symbol is subject to:
 - 1) the Regional Municipality of Waterloo providing written confirmation that sufficient water supply capacity for the proposed number of dwelling units is available and has been allocated to the proposed development; and
 - 2) the submission of a detailed traffic and stationary noise study that assesses noise impacts from abutting land uses and roads and, if necessary, recommends appropriate mitigation measures in accordance with the Ministry of the Environment Publication NPC-300, to the satisfaction of the Township of Woolwich, along with written confirmation provided from the owner demonstrating how the required mitigation measures will be implemented, to the satisfaction of the Township.
- b) That the development of residential or other sensitive uses shall not be permitted on the lands within the Plan identified with an “MU-2 (H2)” symbol, until Council has, by by-law, removed the holding symbol (H2) from the subject lands pursuant to Section 36 of the *Planning Act* (R.S.O. 1990, c. P.13). The removal of the (H2) symbol is subject to:
 - 1) the submission of a detailed traffic and stationary noise study that assesses noise impacts from abutting land uses and roads and, if necessary, recommends appropriate mitigation measures in accordance with the Ministry of the

Environment Publication NPC-300, all to the satisfaction of the Township of Woolwich and the Regional Municipality of Waterloo; and

- 2) the owner shall provide written confirmation to the satisfaction of the Township and the Region that demonstrates how any required mitigation measures will be implemented.

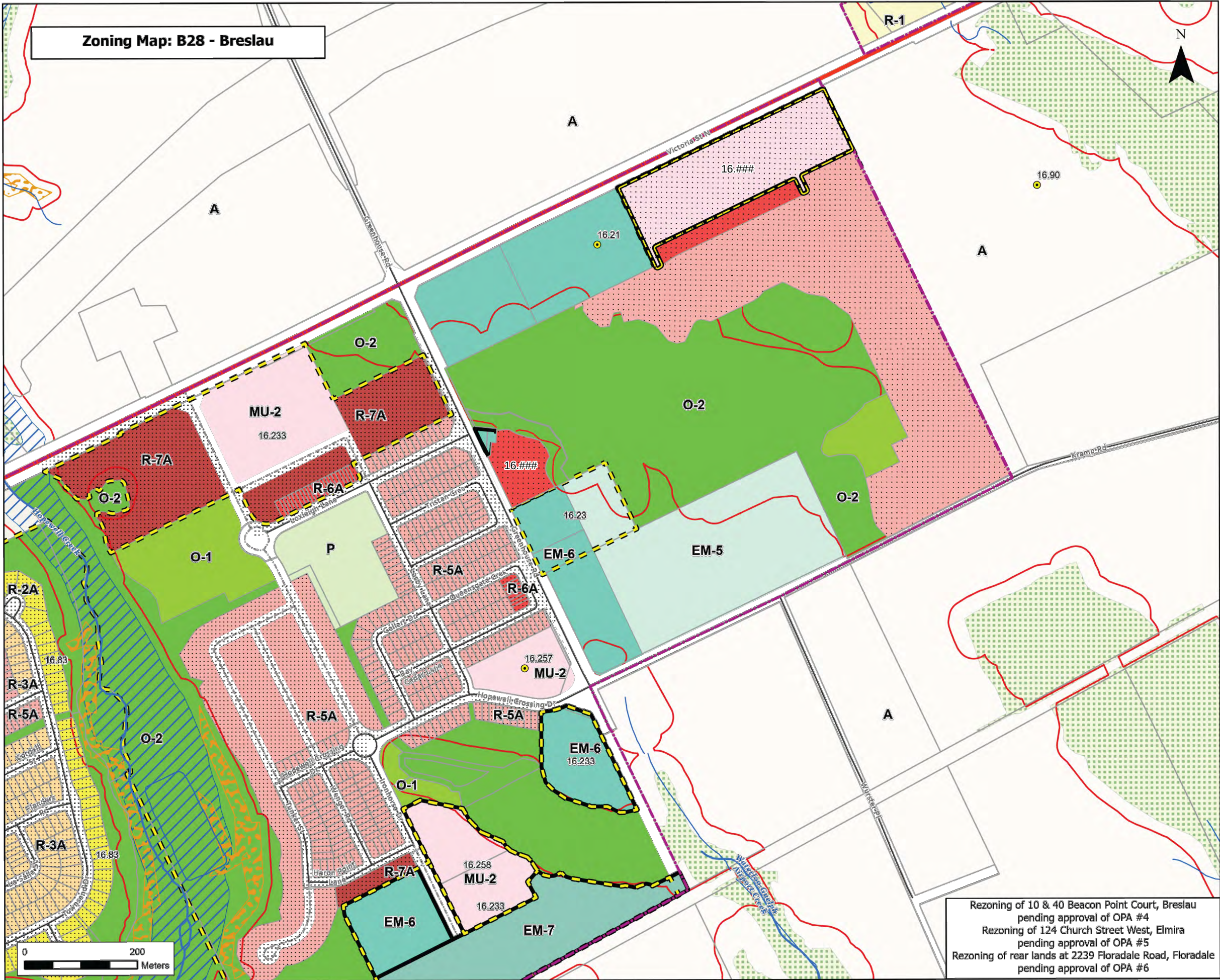
6. That this By-law shall come into full force and effect on the day it is passed.

FINALLY PASSED AND ENACTED this ___th day of [month], 2026.

Mayor

Clerk

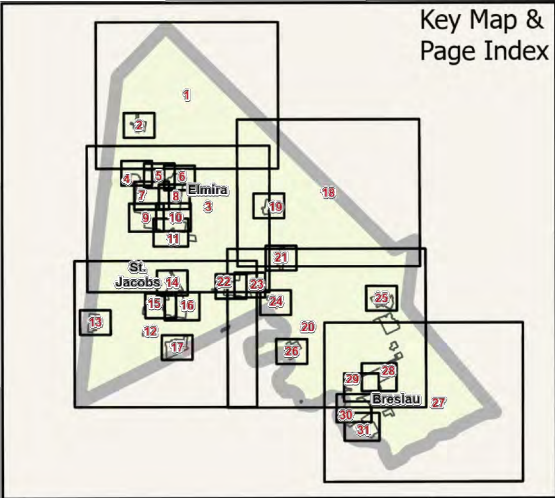
By signing this by-law on the date it is passed, Mayor Sandy Shantz will not exercise the power to veto this by-law.



Zoning Schedule B Maps

Legend

- Property - MPAC
 - Settlement Boundary
 - Township Boundary
 - Site Specific
 - Site Specific - Multiple Properties
 - Holding
 - Design Guidelines (A Suffix)
 - Hazard Lands - Regulatory Buffer Area (RBA)
 - Hazard Lands - Slope Erosion (SE)
 - Hazard Lands - Floodplain (F)
 - Hazard Lands - Flood Way (FW)
 - Hazard Lands - Flood Fringe (FF)
 - Environmental Feature
- Stockyards Overlays**
- Special Provision
 - Holding
- ZONE**
- A
 - C-1
 - C-2
 - C-3
 - C-4
 - C-5
 - C-6
 - E
 - EM-1
 - EM-2
 - EM-3
 - EM-4
 - EM-5
 - EM-6
 - EM-7
 - EM-8
 - MU-1
 - MU-2
 - MU-3
 - MU-4
 - O-1
 - O-2
 - P
 - R-1
 - R-2
 - R-3
 - R-4
 - R-5
 - R-6
 - R-7
 - ST-1
 - ST-2
 - ST-3
 - ST-4



For display purposes only, the roads, watercourses and railway rights-of-way shown on the map do not illustrate the applicable underlying zone. However, as per Section 2.9.2 a) of the Zoning By-law, where any zone boundary is indicated as following a highway, a street, lane, watercourse or railway right-of-way, such zone boundary shall be construed to follow the centre line of the highway, street, lane, watercourse, or railway right-of-way.

Appendix “C” – Modifications to Conditions of Draft Approval

Conditions of Draft Approval for Subdivision Plan 30T-11701

*Original text as set out in Attachment # to the OLT
Decision (Case No. PL130737) issued [OLT Approval
Date]*

Township Conditions

That the Township of Woolwich (hereafter called the “Township”) recommendation of draft approval to the Ontario Municipal Board (hereafter called the “Board”) shall apply to subdivision application 30T-11701 (known as the “Thomasfield Homes Development” or the “Draft Plan”) are subject to the following conditions.

1. That this draft plan approval applies to the Thomasfield Homes Ltd. (the “Subdivider”) Subdivision Application 30T-11701, originally dated March 23, 2011, as most recently modified on May 1, 2026 (hereinafter also referred to as the “Draft Plan” or “Thomasfield Homes Development”), and further that the final plan(s) to be registered shall indicate the following:

Description	Use (Units or Area)
Blocks 1-39, <u>57, 105-123</u>	Single Detached (~~383-484~~ <u>578-751</u> or ~~497~~ <u>764</u> units, subject to Condition 37)
Block 40-42, <u>53, 54</u>	Street Townhouses (~~53~~ <u>89-96</u> units)
Block 43, <u>52</u>	Medium Density Housing (~~40-80~~ <u>92-132</u> units)
Block 44	High Density Housing (158-238 units)
Block 45, 46	Mixed Use Townhouses (31 units)
Block 47, 48, <u>55, 56, 100</u>	Mixed Use Commercial (~~266~~ <u>528</u> units)
Block 49	Neighbourhood Commercial (3.67 ha)
Block 50- ~~57~~ , <u>51</u> , 101	Employment Lands (~~24.86~~ <u>4.55</u> ha)
Block 58	School (2.86 ha)
Block 59, 60, <u>124</u>	Park (~~3.87~~ <u>5.09</u> ha)
Block 61-66	Greenway/Stormwater Management Facility (~~8.03~~ <u>8.25</u> ha)
Block 67	Walkway (0.02 ha)
Block 68	Community Trail (0.06 ha)
Block 69-74	Open Space/Core Greenland & Wetlands (31.49 ha)
Block 75-79, 104, <u>125, 126</u>	Open Space/Greenland Setbacks (~~9.27~~ <u>8.27</u> ha)
Block 80	Future GO Station (3.62 ha)
Block 81	Pumping Station/Utility (0.23 ha)
Block 82-85, 91	Road Widening/Greenhouse Road Extension (1.29 ha)
Block 86-90	Landscape Strip (0.14 ha)
Block 92, 93, 95, 97-99	0.3 metre Reserve (0.00 ha)
Block 94	Right-of-Way/Daylight Triangle (0.04 ha)
Block 96	Union Gas (0.05 ha)
Block 102, 103	Future Connector Road (1.55 ha)
Roads	~~13.16~~ <u>16.32</u> ha

Note: Further housekeeping changes may be required to the above-noted description in order to match the Draft Plan.

Note 1: The Township may accept a new numbering scheme on the final plan for blocks identified above without amending the conditions of draft approval, and that any new numbering scheme shall be deemed to be in conformity with the Official Plan.

Note 2: Potential number of units shown on the Draft Plan and indicated above is an estimate only. Actual units will be determined based on applicable zoning provisions at registration and staging policies in the Official Plan.

[...]

3. That the Final Plan indicates that road allowances identified as Ironhorse Drive (Street 'A'), Galahad Street (Street 'B'), Loxleigh Lane (Street 'C'), Lasby Lane (Street 'D'), Tristan Crescent (Street 'E'), Queensgate Crescent (Street 'F'), Gellert Drive (Street 'G'), Bay Cedar Lane (Street 'H'), Hopewell Crossing Drive (Street 'I'), Tunker Street (Street 'J'), Wenger Road (Street 'K'), Heron Point Lane (Street 'L'), Wambold Street (Street 'M'), [Street 'N', Street 'O', Street 'P'](#), the Greenhouse Road Extension (Block 82), and the Future Connector Road (Blocks 102 and 103) in the Thomasfield Homes Development shall be dedicated to the Township and the naming of the said streets shall be approved by the Township and reserved on the Region's street name inventory.
4. That the Subdivider enter into a Township Standard Subdivision Agreement(s) for the Thomasfield Homes Development to satisfy all the requirements of the Township financially and otherwise, concerning provision of roads and installation of services, facilities, drainage works and any other matters deemed necessary by the Township to develop the subject lands in an orderly and proper manner, which shall include but are not limited to:

A. SERVICING PROVISIONS

[...]

- 3) That all road construction and servicing components for the Thomasfield Homes Development shall be to a standard urban roadway (including sidewalks on both sides of each internal street, a preferred minimum road grading of 0.7%, and LED street lighting), in accordance with the applicable Township standards for settlement subdivision cross-sections for local and collector roads, and all to the satisfaction of the Director of Engineering and Planning Services:

[...]

- iv) 18-metre road allowance widths for Tristan Crescent (Street 'E'), Queensgate Crescent (Street 'F'), Gellert Drive (Street 'G'), Bay Cedar Lane (Street 'H'), the section of Hopewell Crossing Drive (Street 'I') from Ironhorse Drive (Street 'A') to Tunker Street (Street 'J'), Tunker Street (Street 'J'), Wenger Road (Street 'K'), ~~and~~ Heron Point Lane (Street 'L'), [Street 'N', Street 'O', and Street 'P'](#);

[...]

- xi) A 20-metre radius for the Tunker Street (Street 'J') cul-de-sac, [the Street 'N' cul-de-sac, and the Street 'O' cul-de-sac](#);

[...]

- 4) That certain external road improvements shall be completed to the adjacent public roads, as part of the primary services for the applicable phases of the Thomasfield Homes Development as identified below and the details and timing of such road improvements may be further modified upon final approval by the Township, the Region and/or MTO of the Subdivider's Transportation Impact Study (TIS), and any subsequent TIS update, intersection control study and function intersection design as required in Condition 11:

[...]

iii) *Greenhouse Road, from Victoria Street North to Kramp Road* (~~beyond~~ Phase ~~1~~ [4](#))

- reconstruction to a full urban cross-section standard including sidewalks on both sides of the road,
- the installation of turning lanes, which may include a traffic control signal or alternatively a roundabout at the intersection of Greenhouse Road and Loxleigh Lane (Street 'C') as determined by the Township,
- the installation of an appropriately sized roundabout at Kramp Road/Hopewell Crossing Drive (Street 'I') in accordance to an approved functional intersection design submitted by the Subdivider to determine the geometrics of the intersection and land requirements as referenced in Condition 11.

[...]

vi) *Kramp Road, from Greenhouse Road to Wambold Street (Street 'M')* (~~beyond~~ Phase ~~1~~ [4A](#)) – semi-urban cross-section standard which includes sidewalk, curb and gutter on the north side and ditch and culvert on the south side of the road.

[...]

- 15) To extend an appropriately sized sanitary trunk sewer from the terminus at Hopewell Crossing Drive (Street 'I')/Greenhouse Road, which was part of the Phase 1 sanitary servicing works, to Wambold Street (Street 'M'), via Kramp Road as part of the primary services of Phase [4A](#) in accordance with Township standards and all to the satisfaction of the Township.

[...]

- 22) To implement the approved groundwater-monitoring program for the duration until 85% of the residential units [in Phases 1 to 3](#) are constructed in the Draft Plan to determine if the development is having an adverse impact on the private wells located on the adjacent properties on Greenhouse Road and Victoria Street North and the wetland features within Blocks 69-74 on the Draft Plan, as well as confirming if the seasonal high groundwater levels is separated by more than 0.6 metres below the underside of the foundation footings for the residential units in the Draft Plan. [...]
- 23) That the stormwater drainage generated from the Thomasfield Homes Development will be appropriately directed to four (4) stormwater management facilities that will function as a collection/conveyance system for major/minor storm events and a treatment system, which will primarily outlet into Hopewell Creek and secondarily outlet into the Randall Drain, via the wetland features. The proposed facilities will be designed and landscaped to discourage use by geese and gulls given its proximity to the Waterloo International Airport. In addition, certain blocks within the Draft Plan as identified in the approved stormwater management plan will require on-site treatment and/or storage over and above the said facilities. The stormwater management facilities will be constructed as part of the primary services of certain phases of the Draft Plan in the following manner:
- i) The installation of a stormwater management facility, access road, outlet, fencing and landscaping within Block 65 of the Draft Plan as part of the primary services of Phase 1 and the outflow of the facility will discharge into the Randal Drain. Notwithstanding the aforementioned, the Subdivider may also install a temporary stormwater management facility within Phases 3 or 4 or a permanent facility, access road and outlet within Block 63 of Phase [4C](#) for the purpose of accepting stormwater flows generated from Loxleigh Lane (Street 'C')

and the school block on Block 58 within Phase 1, subject to the Township approving the required engineering and planning drawings and securing the required easements;

[...]

- iii) The installation of a stormwater management facility, access road, outlet, fencing and landscaping within Block 63 of the Draft Plan as part of the primary service of Phase 4C and the outflow of the facility will discharge into Hopewell Creek via a culvert system under Victoria Street North (Highway 7). Notwithstanding the aforementioned, if certain lands within Phase 1, which includes Loxleigh Lane (Street 'C') and the school block on Block 58 is required to drain to the north section of the Thomasfield Homes Development, then the Subdivider may install a temporary facility within Phases 3 or 4 or a permanent stormwater management facility, access road and outlet within Block 63 of the Draft Plan as part of the primary services of Phase 1 subject to the Township approving the required engineering and planning drawings and securing the required easements; and
- iv) The installation of a stormwater management facility, access road, outlet, fencing and landscaping within Block 66 of the Draft Plan as part of the primary service of Phase 4A and the outflow of the facility will discharge into the existing wetland feature on Block 72 of the Draft Plan,

in accordance with Township standards and all to the satisfaction of the Township.

[...]

- 30) To install landscaping and plantings within Blocks 86 (Phase 4C) and Blocks 87 to 90 (Phase 1) as part of the primary services of the applicable phase, in accordance with the approved engineering and planning drawings and all to the satisfaction of the Township.

[...]

B. STAGING

- 1) The Township has allocated sewage capacity equivalent to a population flow of 2490 people for the Thomasfield Homes Development, which shall develop in phases as identified on the Draft Plans. No specific sewage allocation is required to be reserved for the proposed non-residential (i.e. school, parks, employment, commercial and GO Station) uses within the Thomasfield Homes Development as these flows are incorporated in the population flow of 2490 people. The Subdivider acknowledges that the said capacity shall only be available to the Thomasfield Homes Development in compliance with the Cross Border Servicing Agreement entered into between the Township and the City of Kitchener dated June 22, 2017.
- 2) Notwithstanding Condition 4.B.1 above, the Subdivider acknowledges that there is a limited amount of capacity available at the Breslau Sanitary Pumping Station (BSPS) that services the Breslau Settlement Area and located within the City of Kitchener next to the Victoria Street Sanitary Pumping Station (VSSPS). However, the BSPS has sufficient wastewater capacity to accommodate the registration of the residential portions of Phases 1, 2, 3 and 4, as well as the associated non-residential blocks (i.e., Employment Lands or Future GO Station) within those Phases, [as approved through the Minutes of Settlement executed on May 18, 2016](#), in the Thomasfield Homes Development without the need to complete the required upgrades to the BSPS to increase capacity in order to realize the wastewater capacity available to the Breslau Settlement Area at the VSSPS through the Cross Border Servicing Agreement referenced in Condition 4.B.1 above. [The allocation of additional sewage capacity equivalent to a population flow greater than 2490 people may be](#)

approved but shall require written confirmation from the Township that capacity exists at the BSPS to accommodate the additional flow.

- 3) That population growth within the Thomasfield Homes Development shall be limited to the following on a yearly basis to maintain an appropriate rate of growth rate for Breslau Settlement Area as per the Breslau Settlement Plan Staging Policies in the Woolwich Township Official Plan as adopted by Council on February 9, 2016:
- i) Year 2017 to 2019 – totalling 619 people or 206/207 people each year
 - ii) Year 2020 to 2022 – totalling 620 people or 206/207 people each year
 - iii) Year 2023 to 2025 – totalling 619 people or 206/207 people each year
 - iv) Year 2026 to 2028 – totalling 632 people or 206/207/219 people each year
 - v) Year 2029 to 2031 – totalling 377 people or 206/171 people each year

Notwithstanding Condition 4.B.3 i) to iv) above, the Mixed-Use Commercial (Block 47) in Phase 1, the Mixed-Use Commercial (Block 48) in Phase 2A, the Mixed-Use Commercial (Block 100) in Phase 2C, and the Mixed-Use Commercial (Blocks 55 and 56), ~~the~~ High Density Residential (Block 44) and Mixed Use Townhouses (Blocks 45 and 46) in Phase 4C of the Draft Plan may develop over and above what was assigned to the Thomasfield Homes Development for a total yearly population in paragraph i) through ~~iv)~~ v) above in this condition.

Note: the 75 units per year agreed to in the Minutes of Settlement was converted to population by using an average PPU of 2.75 as outlined in the Breslau Settlement Plan. A measurement in population also aligns with the wastewater allocation in Condition 4.B.1.

The Township shall permit the Subdivider to register a 3-year supply of residential building permits to achieve the above-noted yearly population growth when developing respective phases of the Thomasfield Homes Development. The Population Per Household Units (PPU) that will be used to convert the population into residential units are based on the Regional PPU average used in the Region's Wastewater Monitoring Report (June 2024), as follows:

- Single Detached or Semi Detached – 3.25 PPU
- Townhouse – 2.44 PPU
- Apartment – 1.77 PPU
- Multiple Unit Type – 2.11 PPU
- Unspecified Unit Types – 3.05 PPU

Unrealized development potential from one time period may be assigned to the subsequent time periods.

The Township and Subdivider agrees that the PPU noted above will be reviewed every five (5) years and the Township will rely on information provided by the Region should the PPU change to reflect updated demographics of the region.

Should the Subdivider develop beyond the yearly cap noted above and is proceeding to register the next phase, the Township may refuse to issue a clearance letter to the Region for the registration of the phase. Once sufficient time has elapsed and the Subdivider conforms to the phasing program outlined in this Condition, the Township will release its clearance letter to allow the next phase to proceed to registration, provided that all other applicable conditions of draft approval for that phase have been satisfied.

[...]

- 5) That the phasing of development for the Thomasfield Homes Development shall occur in sequential order starting from Phase 1 and ending in Phase 4, as shown on the Draft Plan and in accordance with the Phasing provisions identified in Condition 4.B, save and except that the development of residential blocks in Phases 3A, 3B, [4A](#), [4B](#) and [4C](#) may proceed before Phases 2C and 2D. Notwithstanding the above, the Subdivider may register a portion of, or a variation to, a phase, which may require an amendment to the Township's Subdivision Agreement(s), but may not require a modification to the Draft Plan.

- 6) That the development and registering [of](#) Phase [4C](#) shall not occur until after the Ministry of Transportation (MTO) has transferred the jurisdiction of Victoria Street North, adjacent to the Draft Plan, to the Regional Municipality of Waterloo (the "Region") or written consent is provided from the Region and MTO that development can occur prior to the transfer of Victoria Street North and the Region has subsequently approved the connections of Ironhorse Drive (Street 'A') and/or Wambold Street (Street 'M') to Victoria Street North, and all other staging conditions in Condition 4.B have been satisfied. [The registration and development of Phases 4A and 4B may occur prior to the transfer of Victoria Street North if the external road improvements described in Condition 4.A.4 vi\) above has been completed to the satisfaction of the Township.](#)

- 7) That servicing and registration of the Employment Lands in the Draft Plan will be staged in conjunction with the residential portion of the development and shall occur no later than the applicable phases outlined below:
 - i) Phase 1 – Blocks ~~51 and 52~~; [and](#)
 - ii) Phase 2A – Block 50 and Phase 2C – Block 101~~;~~
 - iii) ~~Deleted. Phase 4 – Blocks 53-57. Alternatively, the Township may allow the servicing and registration of all or portion of Blocks 53-57 prior to Phase 4 and in conjunction with Phases 1, 2 or 3 or as part of its own sub-phase, if the following occurs:~~
 - ~~The Region has jurisdiction of Victoria Street North and approves a connection of Wambold Street (Street 'M') and all other required servicing, access and road improvements related to the registration of these blocks as identified elsewhere in these conditions are adequately addressed, or~~
 - ~~The Subdivider proposes to service and register Block 53 and a portion of Block 57 on a portion of Wambold Street (Street 'M') prior to the Region having jurisdiction over Victoria Street North, subject to the Subdivider adequately addressing all other required servicing, access and road improvements identified elsewhere in these conditions,~~

~~all to the satisfaction of the Township.~~

[...]

- 10) To construct and convey the stormwater management facilities on Block 65 (Phase 1), Block 61 (Phase 2B), [Block 66 \(Phase 4A\) and](#) Block 63 (Phase [4C](#)) ~~and Block 66 (in conjunction with the development of Blocks 53 to 57)~~ as outlined in Condition 4.A.23.

11. That the required external road works to the Victoria Street North/Greenhouse Road intersection, Greenhouse Road and Kramp Road asphalt overlay (Phase 1) and the reconstruction/extension of Greenhouse Road (Phase 2C, 2D, 3A or 3B, subject to an updated Transportation Impact Study) and Kramp Road (Phases 3A, 3B, [4A](#), [4B](#) or [4C](#), subject to an updated Transportation Impact Study) as outlined in Condition 4.A.4.

[...]

- 18) That townhouses shall be developed on Block 40 (Phase 2A), Blocks 41 and 42 (Phase 1), and Blocks 53 and 54 (Phase 4C) on the Draft Plan.
- 19) That mixed use townhouses may develop on Blocks 45 and 46 (Phase 4C) on the Draft Plan.
- 20) That Medium Density Residential shall develop on Block 43 (Phase 4C) and Block 52 (Phase 1B) and High Density Residential shall develop on Block 44 (Phase 4C) of the draft Plan.
- 21) That Mixed Use Commercial shall develop on Block 47 (Phase 1B), Block 48 (Phase 2A), ~~and~~ Block 100 (Phase 2C), and Blocks 55 and 56 (Phase 4C) of the Draft Plan.
- 22) That the Subdivider's obligation to convey the Greenhouse Road Extension (Block 82) and Future Connector Road (Blocks 102 and 103), as shown on the Draft Plan, shall be the following:

[...]

 - iii) In conjunction with the development and/or registration of Phases 2C (subject to addressing the provision of emergency access under Condition 4.B.22.ii above), 3A, 3B, 4A, 4B and/or 4C at the discretion of the Township, if the Township determines, as per Condition 27, that the construction of entire alignment for the Breslau Connector Road as illustrated in the approved Environmental Assessment, prepared by Associated Engineering, titled "Woolwich Township Breslau East Connector Road Class Environmental Assessment Schedule 'C'" and dated August 2022 will occur within five years from the registration and/development of the respective phases as noted in this subsection, above.

[...]
- 24) That the Subdivider's obligation either to construct or to provide financial contribution to the Township to construct the Greenhouse Road Extension (Block 82) and the portion of the Breslau Connector Road within the Draft Plan (i.e., the Future Connector Road on Blocks 102 and 103) as further described in Condition 4.A.5 iii), which hereinafter includes a proportional share of the design, engineering and administration costs as apportioned under Condition 4.A.5 iii), shall be:

[...]

 - ii) to provide financial contribution to the Township for the Greenhouse Road Extension (Block 82) and a portion of the Future Connector Road (Block 102), in accordance with the apportionment set out in Condition 4.A.5 iii):

[...]

 - b) in conjunction with the registration and development of Phase 3A, 3B, 4A, 4B and/or 4C at the discretion of the Township, if the Township has determined that the construction of the entire alignment for the Breslau Connector Road, as described and provided for under Condition 27, will occur within five years of the registration and/or development of the Phase in question.

C. CONVEYANCES

- 1) The Subdivider agrees that the following Blocks identified on the applicable Draft Plan shall be conveyed to the Township, free and clear of encumbrances, immediately following registration of the applicable phase and prior to conveyance of any other lots or blocks in the applicable phase:

- i) Blocks 65 (Phase 1), 61 (Phase 2B), [66 \(Phase 4A\)](#), and 63 (Phase 4C) ~~and 66 (Phase 3 or 4: see Condition 4.B)~~ on the Draft Plan for the purpose of stormwater management facilities;
[...]
- iii) Blocks 59 (Phase 3B), ~~and~~ 60 (Phase 2A), [and 124 \(Phase 4A\)](#) on the Draft Plan to satisfy the requirement that 5% of the land included in the Draft Plan be conveyed to the Township of Woolwich for park purposes pursuant to the provisions of Section 51.1 (1) of the Planning Act (R.S.O. 1990, c. P.13);
- iv) Blocks 70, 78 and Part of 77 (Phase 1), Blocks 69, 75 and 76 (Phase 2B), Blocks 71, 101 and Part of 77 (Phase 2D), ~~Block 74 (Phase 4) and~~ Blocks 72, 73 and 79 (~~no later than~~ Phase 4A: ~~see Condition 4.B)~~, [Blocks 125 and 126 \(Phase 4B\)](#), and [Block 74 \(Phase 4C\)](#) on the Draft Plan for open space (which may contain community trail) purposes;
[...]
- vii) Blocks 87, 88, 89, 90 (Phase 1) and 86 (Phase 4C) on the Draft Plan for landscape purposes adjacent to Greenhouse Road;
[...]
- ix) Block 85 (Phase ~~3 or 4~~ [A](#) ~~see Condition 4.B)~~ on the Draft Plan for road widening purposes on Kramp Road;
[...]
- [...]

D. OPEN SPACE / PARKS

- 1) The Subdivider agrees to develop Block 59 (Phase 3B), ~~and~~ Block 60 (Phase 2A), [and Block 124 \(Phase 4A\)](#) on the Draft Plan for the purpose of a neighbourhood park, as part of the primary servicing of the applicable phase by:
 - i) grading the parcel in accordance with the approved grading and drainage plan,
 - ii) installing a suitable sub-base to support the various recreational fields, structures and buildings, and associated parking,
 - iii) placing a suitable depth of topsoil and seed,
 - iv) installing landscape and plantings along the perimeter of the park, and
 - v) installing fencing and/or demarcation monuments with trees adjacent to the rear lot lines of the abutting residential properties (Note: to be determined by the Township at the detailed design), to delineate the limits of the park at the discretion of the Township,
 in accordance with the approved detailed engineering design to the satisfaction of the Township.
[...]
- 6) The Subdivider agrees to include in the Offer of Purchase and Sale Agreement for lots/blocks abutting the open space areas (Blocks 69-79 [and 125-126](#)), greenway/community trail (Blocks 62, 64 and 68) and the stormwater management facilities (Blocks 61, 63, 65 and 66) the applicable provisions which states:

- i) That the grading and development of the residential lots backing onto the open space or public lands shall not impact or encroach onto such lands with any building and/or structure (e.g. fences, retaining walls, poles, composters, children's play structures, landscape features, etc.) and there shall be no dumping;
- ii) A stormwater management facility and the public trail system will be developed adjacent to your property; and
- iii) That fencing or demarcation monuments with trees are located on public lands adjacent to your property shall not be removed or disturbed for any purposes and any disturbance or removal on a temporary basis shall require approval from the Township.

[...]

G. COMMERCIAL AND EMPLOYMENT LANDS BLOCKS

- 1) The owner agrees that the development of Blocks 47 to ~~57~~ [51, Blocks 55 and 56](#), and Blocks 100 and 101 on the Draft Plan for Neighbourhood Commercial, Mixed Use Commercial and Employment Lands purposes, as permitted, shall be subject to Site Plan Control under Section 41 of the Planning Act, R.S.O. 1990, as amended, and the Site Plan Agreement(s) shall include requirements for visual attenuation measures adjacent to neighbouring properties and noise attenuation measures as per any Noise Study approved by the Region, as required.
- 2) The owner agrees to complete a detailed noise study prepared by an acoustical engineer, if required by the Township, for Blocks 47 to ~~52~~ [51](#) and Blocks 100 and 101 on the Draft Plan for the purpose of assessing the potential stationary noise impacts on the surrounding residential uses as result of the development of the said Blocks as determined through the Site Plan (Section 41 of the Planning Act) process and for the purpose of indicating, to the satisfaction of the Township, measures to be used to attenuate stationary noise levels, and if necessary to enter into a subsequent agreement with the Township to provide for the implementation of any approved noise attenuation measures.
- 3) ~~That on-site water booster pumping station may be required for certain employment land developments on Blocks 53 to 57 of the Draft Plan to address deficiencies in water pressure for firefighting capabilities, as determined through the Site Plan (Section 41 of the Planning Act) approval process. Deleted.~~ [Deleted.](#)

[...]

I. ENVIRONMENTAL

- 1) To implement the recommendations in the approved Comprehensive Environmental Impact Study prepared by Natural Resources Solutions Inc, titled "Proposed Mixed Use Development Ariss Glen Developments & Thomasfield Homes Woolwich Township (Breslau)", dated March 2011 as supplemented by Addendum Report dated March 2012 and January 2016 for the protection, restoration, enhancement and monitoring of the core environmental feature (i.e. natural areas) and its associated ecological buffer with the Thomasfield Homes Development, which includes but is not limited to the following:

[...]

- x) Ensure, as part of Site Plan Approval, that any lighting to be installed within [Medium Density Residential Block 52](#), High Density Residential Block 44, Mixed Use Commercial

Blocks 48 and 100, and Employment Blocks ~~51 to 54~~ be designed so as not to shine into the Core Environmental Features.

[...]

[...]

9. That the Subdivider shall submit a detailed hydrogeological monitoring program prepared by a qualified Hydrogeologist which provides the following details:

[...]

- v) Confirming that the duration of the monitoring program shall be until 85% of the residential units [in Phases 1 to 3](#) are constructed in the Draft Plan.

[...]

[...]

27. That prior to the registration of Phases 2C, 2D, 3A, 3B, [4A, 4B](#) and/or [4C](#), the Subdivider shall confirm with the Township as to whether Block 82, Block 102 and/or Block 103 will be conveyed to the Township in conjunction with the applicable phase, as provided for in Condition 4.B.22 above, as a result of the Township making the determination that the construction of entire alignment for the Breslau Connector Road as illustrated in the approved Environmental Assessment, prepared by Associated Engineering, titled "Woolwich Township Breslau East Connector Road Class Environmental Assessment Schedule 'C'" and dated August 2022, will occur within five years from the registration and/or development of the applicable phases noted above.

[...]

Region Conditions

[...]

18. That the Owner/Developer agrees:

[...]

- b) to provide and maintain a temporary emergency access to the satisfaction of the Township of Woolwich, ~~and~~ the Regional Municipality of Waterloo, [and where applicable the Ministry of Transportation](#), if more than 26 units are developed with one point of access due to phasing.

[...]

36. That prior to final approval, the Owner/Developer enters into a development agreement with the Regional Municipality of Waterloo to complete, prior to Site Plan Approval, a Salt Management Plan for Blocks 47, 51 and 52 (Phase 1), Blocks 48 and 50 (Phase 2A), Blocks 100 and 101 (Phase 2C), Block 80 (Phase 2D), and Blocks 43, 44, 49, ~~and 53 to 57~~ [55 and 56](#) (Phase ~~3 and 4C~~) to the satisfaction of the Regional Municipality of Waterloo.

37. That prior to final approval of Phases 1, ~~2D and 3B~~ to 4, the Owner/Developer submits a detailed Noise Study to assess traffic noise impacts from Victoria Street North, Greenhouse Road, ~~and~~ Ironhorse Drive (Street 'A'), and Wambold Street (Street 'M') (operating at full build-out of the plan) if the Average Annual Daily Traffic count for each one of the above roads is above 4000 vehicles based on the Transportation Impact Study Addendum required in Condition no. 49 a), and to assess stationary noise impacts from any adjacent existing industry on all residential blocks within Phase 1 of the plan and indicate to the satisfaction of the Regional Municipality of Waterloo and the Township of Woolwich methods to be used to attenuate any traffic or stationary noise impacts, and enters into a development agreement with the Township of Woolwich to provide for implementation of the approved noise attenuation measures.

[...]

42. That prior to final approval of Phase 4C, the Owner/Developer enters into a development agreement with the Regional Municipality of Waterloo (if Victoria Street North is under the Region's jurisdiction) to complete, prior to Site Plan Approval, a detailed Traffic Noise Study for High Density Residential Block 44 and Mixed-Use Commercial Blocks 55 and 56 to assess traffic noise levels from Victoria Street North and indicate to the satisfaction of the Regional Municipality of Waterloo methods to be used to attenuate noise levels from the highway, and if necessary, enter into a subsequent agreement with the Region to provide for implementation of any approved noise attenuation measures. Further, prior to final approval of Phase 4C, the agreement shall specify that the following noise warning clauses be included in all offers of purchase and sale, lease and/or rental agreements for Blocks 44, 55 and 56:

"Purchasers/tenants are advised that sound levels due to increasing road traffic on Victoria Street North may occasionally interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks."

"This dwelling has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks."

[...]

49. a) That prior to final approval of Phases 1, ~~2D and 3B~~ to 4 of the plan, the Owner/Developer submits a Transportation Impact Study Addendum, including a Roundabout Screening and an Intersection Control Study if required, for the Greenhouse Road and Victoria Street North intersection, a detailed design and a cost estimate for any intersection improvements identified in the study, and any required road widenings at this intersection to accommodate any identified intersection improvements, such as a roundabout or signalization, shall be dedicated on the final plan for registration to the appropriate road authority, all to the satisfaction of the Ministry of Transportation, the Regional Municipality of Waterloo and the Township of Woolwich (in consultation with Metrolinx).

[...]

50. That prior to final approval of Phase 4C and in the event that the Ministry of Transportation has at their discretion transferred the portion of Victoria Street North adjacent to this plan to the Regional Municipality of Waterloo, the Owner/Developer shall:

[...]

[...]

Appendix “D” – 2024 Financial Information Return (Woolwich Tp)

Schedule 40 (Consolidated Statement of Operations: Expenses)					Schedule 12 (Grants, User Fees & Service Charges)	
Service ^(a)	Salaries, Wages & Employee Benefits	Materials	Contracted Services	Rents	User Fees & Service Charges	
General Government						
0240 Governance	180,030	109,708	15,199	0	---(b)	
0250 Corporate Management	987,680	371,831	45,499	5,094	---(b)	
0260 Program Support	1,413,216	425,682	362,088	5,094	---(b)	
0299	Subtotal	2,580,926	907,221	422,786	10,188	120,234
Protection Services						
0410 Fire	1,646,903	653,285	236,963	0	207,398	
0440 Protective Inspection & Control	373,072	64,929	17,805	0	58,581	
0445 Building Permit & Inspection Services	881,342	70,180	45,164	0	3,963	
0499	Subtotal	2,901,317	788,394	299,932	0	269,942
Transportation Services						
0611 Roads - Paved	1,705,881	1,110,643	445,835	0	2,700	
0612 Roads - Unpaved	83,691	69	588,297	0	0	
0613 Roads - Bridges & Culverts	3,777	33,444	73,020	0	0	
0614 Roads - Traffic Operations & Roadside	192,227	133,938	259,467	0	12,465	
0621 Winter Control - Except Sidewalks, Parking Lots	93,897	351,277	91,100	0	0	
0622 Winter Control - Sidewalks, Parking Lots Only	2,852	34,032	488,536	0	36,220	
0640 Parking	-580	31,328	0	14,637	0	
0650 Street Lighting	0	20,988	107,243	0	0	
0699	Subtotal	2,081,745	1,715,719	2,053,498	14,637	51,385
Environmental Services						
0811 Wastewater Collection / Conveyance	525,511	91,558	249,508	0	1,691,863	
0821 Urban Storm Sewer System	20,266	686,810	126,278	0	0	
0832 Water Distribution / Transmission	685,281	559,393	320,584	0	3,339,211	
0899	Subtotal	1,231,058	1,337,761	696,370	0	5,031,074
Health Services						
1040 Cemeteries	15,547	46,146	19,963	0	78,898	
1099	Subtotal	15,547	46,146	19,963	0	78,898
Social & Family Services						
1299	Subtotal	0	0	0	0	0
Social Housing						
1499	Subtotal	0	0	0	0	0
Recreation & Cultural Services						
1610 Parks	259,108	615,234	159,519	0	412,945	
1620 Recreation Programs	34,705	130,064	0	0	208,241	
1634 Recreation Facilities - All Other	3,155,694	2,490,684	420,749	2,383	2,161,089	
1640 Libraries	0	710	27,810	0	32,512	
1699	Subtotal	3,449,507	3,236,692	608,078	2,383	2,814,787
Planning & Development						
1810 Planning & Zoning	615,928	375,321	82,012	0	2,820,156	
1820 Commercial & Industrial	865,556	163,742	70,234	0	2,111	
1899	Subtotal	1,481,484	539,063	152,246	0	2,822,267
1910 Other	0	0	0	0	0	
9910	Total	13,741,584	8,570,996	4,252,873	27,208	11,188,587

^(a)The following lines have been omitted because the values shown in this table would all be zero:

Protection Services — Police (0420), Court Security (0421), Prisoner Transportation (0422), Conservation Authority (0430), Emergency Measures (0450), Provincial Offences Act (0460), Other (0498)

Transportation Services — Transit - Conventional (0631), Transit - Accessible (0632), Air Transportation (0660), Other (0698)

Environmental Services — Wastewater Treatment & Disposal (0812), Rural Storm Sewer System (0822), Water Treatment (0832), Solid Waste Collection (0840), Solid Waste Disposal (0850), Waste Diversion (0860), Other (0898)

Health Services — Public Health Services (1010), Hospitals (1020), Ambulance Services (1030), Ambulance Dispatch (1035), Other (1098)

Social & Family Services — General Assistance (1210), Assistance to Seniors (1220), Child Care & Early Years Learning (1230), Other (1298)

Social Housing — Public Housing (1410), Non-Profit / Cooperative Housing (1420), Rent Supplement Programs (1430), Other (1497), Other (1498)

Recreation & Cultural Services — Recreation Facilities - Golf Course, Marina, Ski Hill (1631), Museums (1645), Cultural Services (1650), Other (1698)

Planning & Development — Residential Development (1830), Agriculture & Reforestation (1840), Tile Drainage / Shoreline Assistance (1850), Other (1898)

^(b)General Government not itemized on Schedule 12.

Appendix “E” – Provincial Planning Statement, 2024

This appendix presents the exact wording of the policies in the Provincial Planning Statement, 2024 that are discussed in Section 5.1 of this report. Omissions are indicated using ellipses in square brackets.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

2.1 Planning for People and Homes

[...]

- 2.1.3 At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.

- 2.1.4 To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:
- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and
 - b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.

[...]

- 2.1.6 Planning authorities should support the achievement of complete communities by:
- a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;
 - b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and
 - c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.

2.2 Housing

- 2.2.1 Planning authorities shall 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.

2.3 Settlement Areas and Settlement Area Boundary Expansions

2.3.1 General Policies for Settlement Areas

- 2.3.1.1 Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.
- 2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:
- a) efficiently use land and resources;
 - b) optimize existing and planned infrastructure and public service facilities;
 - c) support active transportation;
 - d) are transit-supportive, as appropriate; and
 - e) are freight-supportive.
- [...]
- 2.3.1.5 Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.

- 2.3.1.6 Planning authorities should establish and implement phasing policies, where appropriate, to ensure that development within designated growth areas is orderly and aligns with the timely provision of the infrastructure and public service facilities.

[...]

2.8 Employment

2.8.1 Supporting a Modern Economy

- 2.8.1.1 Planning authorities shall promote economic development and competitiveness by:
- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;
 - b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;
 - c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;
 - d) encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and
 - e) addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.

[...]

- 2.8.1.3 In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.

[...]

2.8.2 Employment Areas

- 2.8.2.1 Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.
- 2.8.2.2 Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.

- 2.8.2.3 Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:
- a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;
 - b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;
 - c) prohibiting retail and office uses that are not associated with the primary employment use;
 - d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and
 - e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.
- 2.8.2.4 Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.
- 2.8.2.5 Planning authorities may remove lands from employment areas only where it has been demonstrated that:
- a) there is an identified need for the removal and the land is not required for employment area uses over the long term;
 - b) the proposed uses would not negatively impact the overall viability of the employment area by:
 - 1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;
 - 2. maintaining access to major goods movement facilities and corridors;
 - c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and
 - d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.

2.9 Energy Conservation, Air Quality and Climate Change

- 2.9.1 Planning authorities shall 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.

Chapter 3: Infrastructure and Facilities

3.1 General Policies for Infrastructure and Public Service Facilities

- 3.1.1 Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:

- a) are financially viable over their life cycle, which may be demonstrated through asset management planning;
- b) leverage the capacity of development proponents, where appropriate; and
- c) are available to meet current and projected needs.

- 3.1.2 Before consideration is given to developing new infrastructure and public service facilities:

- a) the use of existing infrastructure and public service facilities should be optimized; and
- b) opportunities for adaptive re-use should be considered, wherever feasible.

- 3.1.3 Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety in accordance with the policies in Chapter 5: Protecting Public Health and Safety.

- 3.1.4 Public service facilities should be planned and co-located with one another, along with parks and open space where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and active transportation.

[...]

3.2 Transportation Systems

- 3.2.1 Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero-and low-emission vehicles.

- 3.2.2 Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.
- 3.2.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be planned for, maintained and, where possible, improved, including connections which cross jurisdictional boundaries.

3.3 Transportation and Infrastructure Corridors

- 3.3.1 Planning authorities shall plan for and protect corridors and rights-of-way for infrastructure, including transportation, transit, and electricity generation facilities and transmission systems to meet current and projected needs.
- 3.3.2 Major goods movement facilities and corridors shall be protected for the long term.
- 3.3.3 Planning authorities shall not permit development in planned corridors that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified.

New development proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts on and adverse effects from the corridor and transportation facilities.
- 3.3.4 The preservation and reuse of abandoned corridors for purposes that maintain the corridor's integrity and continuous linear characteristics should be encouraged, wherever feasible.
- 3.3.5 The co-location of linear infrastructure should be promoted, where appropriate.

3.4 Airports, Rail and Marine Facilities

- 3.4.1 Planning for land uses in the vicinity of airports, rail facilities and marine facilities shall be undertaken so that:
 - a) their long-term operation and economic role is protected; and
 - b) airports, rail facilities and marine facilities, and sensitive land uses are appropriately designed, buffered and/or separated from each other, in accordance with policy 3.5.
- 3.4.2 Airports shall be protected from incompatible land uses and development by:
 - a) prohibiting new residential development and other sensitive land uses in areas near airports above 30 NEF/NEP;
 - b) considering redevelopment of existing residential uses and other sensitive land uses or infilling of residential and other sensitive land uses in areas above 30 NEF/NEP only if it has been demonstrated that there will be no negative impacts on the long-term function of the airport; and
 - c) prohibiting land uses which may cause a potential aviation safety hazard.

3.5 Land Use Compatibility

- 3.5.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.
- 3.5.2 Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects [sic] to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.

3.6 Sewage, Water and Stormwater

- 3.6.1 Planning for sewage and water services shall:
- a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;
 - b) ensure that these services are provided in a manner that:
 - 1. can be sustained by the water resources upon which such services rely;
 - 2. is feasible and financially viable over their life cycle;
 - 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and
 - 4. aligns with comprehensive municipal planning for these services, where applicable.
 - c) promote water and energy conservation and efficiency;
 - d) integrate servicing and land use considerations at all stages of the planning process;
 - e) consider opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply; and
 - f) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.
- 3.6.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.

[...]

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

[...]

3.9 Public Spaces, Recreation, Parks, Trails and Open Space

- 3.9.1 Healthy, active, and inclusive communities should be 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.

Chapter 4: Wise Use and Management of Resources

4.1 Natural Heritage

- 4.1.1 Natural features and areas shall be protected for the long term.
- 4.1.2 The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where

possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

- 4.1.3 Natural heritage systems shall be identified in Ecoregions 6E & 7E, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.
- 4.1.4 Development and site alteration shall not be permitted in:
 - a) significant wetlands in Ecoregions 5E, 6E and 7E; and
 - b) significant coastal wetlands.
- 4.1.5 Development and site alteration shall not be permitted in:
 - a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E;
 - b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
 - c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
 - d) significant wildlife habitat;
 - e) significant areas of natural and scientific interest; and
 - f) coastal wetlands in Ecoregions 5E, 6E and 7E that are not subject to policy 4.1.4(b),

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.
- 4.1.6 Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.
- 4.1.7 Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.
- 4.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.
- 4.1.9 Nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue.

4.2 Water

- 4.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by:
 - a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;
 - b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts;
 - c) identifying water resource systems;
 - d) maintaining linkages and functions of water resource systems;

- e) implementing necessary restrictions on development and site alteration to:
 - 1. protect all municipal drinking water supplies and designated vulnerable areas; and
 - 2. protect, improve or restore vulnerable surface and ground water, and their hydrologic functions;
 - f) planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and
 - g) ensuring consideration of environmental lake capacity, where applicable.
- 4.2.2 Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches.

[...]

4.3 Agriculture

4.3.1 General Policies for Agriculture

- 4.3.1.1 Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.
- 4.3.1.2 As part of the agricultural land base, prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture.
- 4.3.1.3 Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through 7 lands within the prime agricultural area, in this order of priority.

4.3.2 Permitted Uses

- 4.3.2.1 In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance.

Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.
- 4.3.2.2 In prime agricultural areas, all types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with provincial standards.

[...]

4.3.4 Removal of Land from Prime Agricultural Areas

- 4.3.4.1 Planning authorities may only exclude land from prime agricultural areas for expansions of or identification of settlement areas in accordance with policy 2.3.2.

4.3.5 Non-Agricultural Uses in Prime Agricultural Areas

- 4.3.5.1 Planning authorities may only permit non-agricultural uses in prime agricultural areas for:
- a) extraction of minerals, petroleum resources and mineral aggregate resources; or
 - b) limited non-residential uses, provided that all of the following are demonstrated:

[...]

[...]

4.4 Minerals and Petroleum

4.4.1 General Policies for Minerals and Petroleum

- 4.4.1.1 Minerals and petroleum resources shall be protected for long-term use.

4.4.2 Protection of Long-Term Resource Supply

- 4.4.2.1 Mineral mining operations and petroleum resource operations shall be identified and protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact.
- 4.4.2.2 Known mineral deposits, known petroleum resources and significant areas of mineral potential shall be identified, and development and activities in these resources or on adjacent lands which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:
- a) resource use would not be feasible; or
 - b) the proposed land use or development serves a greater long-term public interest; and
 - c) issues of public health, public safety and environmental impact are addressed.

[...]

4.5 Mineral Aggregate Resources

4.5.1 General Policies for Mineral Aggregate Resources

- 4.5.1.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.

4.5.2 Protection of Long-Term Resource Supply

[...]

- 4.5.2.4 Mineral aggregate operations shall be protected from development and activities that would preclude or hinder their expansion or continued use or which would be incompatible for reasons of public health, public safety or environmental impact. Existing mineral aggregate operations shall be permitted to continue without the need for official plan amendment, rezoning or development permit under the *Planning Act*. Where the *Aggregate Resources Act* applies, only processes under the *Aggregate Resources Act* shall address the depth of extraction of new or existing mineral aggregate operations. When a license for extraction or operation ceases to exist, policy 4.5.2.5 continues to apply.
- 4.5.2.5 In known deposits of mineral aggregate resources and on adjacent lands, development and activities which would preclude or hinder the establishment of new operations or access to the resources shall only be permitted if:
- a) resource use would not be feasible; or
 - b) the proposed land use or development serves a greater long-term public interest; and
 - c) issues of public health, public safety and environmental impact are addressed.

[...]

4.6 Cultural Heritage and Archaeology

- 4.6.1 Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.
- 4.6.2 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.
- 4.6.3 Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.
- 4.6.4 Planning authorities are encouraged to develop and implement:
- a) archaeological management plans for conserving archaeological resources; and
 - b) proactive strategies for conserving significant built heritage resources and cultural heritage landscapes.
- 4.6.5 Planning authorities shall engage early with Indigenous communities and ensure their interests are considered when identifying, protecting and managing archaeological resources, built heritage resources and cultural heritage landscapes.

Chapter 5: Protecting Public Health and Safety

5.1 General Policies for Natural and Human-Made Hazards

- 5.1.1 Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.

5.2 Natural Hazards

- 5.2.1 Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.
- 5.2.2 Development shall generally be directed to areas outside of:
[...]
- b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and
 - c) hazardous sites.
- 5.2.3 Development and site alteration shall not be permitted within:
[...]
- c) areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard; and
 - d) a floodway regardless of whether the area of inundation contains high points of land not subject to flooding.
- 5.2.4 Planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards.
- 5.2.5 Despite policy 5.2.3, development and site alteration may be permitted in certain areas associated with the flooding hazard along river, stream and small inland lake systems:
- a) in those exceptional situations where a Special Policy Area has been approved. The designation of a Special Policy Area, and any change or modification to the official plan policies, land use designations or boundaries applying to Special Policy Area lands, must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry prior to the approval authority approving such changes or modifications; or
 - b) where the development is limited to uses which by their nature must locate within the floodway, including flood and/or erosion control works or minor additions or passive non-structural uses which do not affect flood flows.

[...]

- 5.2.9 Development shall generally be directed to areas outside of lands that are unsafe for development due to the presence of hazardous forest types for wildland fire.

Development may however be permitted in lands with hazardous forest types for wildland fire where the risk is mitigated in accordance with wildland fire assessment and mitigation standards.

5.3 Human-Made Hazards

- 5.3.1 Development on, abutting or adjacent to lands affected by mine hazards; oil, gas and salt hazards; or former mineral mining operations, mineral aggregate operations or petroleum resource operations may be permitted only if rehabilitation or other measures to address and mitigate known or suspected hazards are under way or have been completed.
- 5.3.2 Sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects.