

Planning Justification Report

1128 & 1134 Printery Road

Village of St. Jacobs, Woolwich Township

Zoning By-law Amendment

Draft Plan of Subdivision

September 2025



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Prepared for:

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1. Introduction

1.1 Overview

GSP Group Inc. (“GSP”) has been retained by KSB Printery Road Inc. (the “Applicant”) to prepare a Planning Justification Report (“PJR” or “Report”) in support of a Zoning By-law Amendment and Draft Plan of Subdivision Application (the “Subject Applications”) for the lands municipally addressed as 1128 & 1134 Printery Road in the Village of St. Jacobs in the Township of Woolwich and legally described as PLAN 1502 LOT 3 & LOT 4 (the “Site”), as shown in **Figure 1**.

The purpose of the Subject Applications are to facilitate the development of a Draft Plan of Subdivision consisting of two blocks of street fronting townhouse units (11 dwelling units total) and a multiple residential development block for the future development of three cluster townhouse blocks (18 dwelling units total). Overall, the Subject Applications will permit a total of 29 dwelling units, a private road, sidewalk and associated driveways and rear yard amenity space for each of the units (the “Proposed Development”). A future condominium application will be prepared for the tenure and obligations of the 18 cluster townhouse dwellings.

To facilitate the Proposed Development, the Subject Applications request:

- Zoning By-law Amendment Application to rezone the Site
- Draft Plan of Subdivision Application to create 11 street fronting townhouse dwelling lots fronting Printery Road and a multiple residential development block.

A pre-consultation meeting for Zoning By-law Amendment and Draft Plan of Subdivision was held in July 2024 (File No. 2024-014). The Township identified a PJR as a requirement of a complete application. The Township requires a Zoning By-law Amendment and Draft Plan of Subdivision Application prior to a future Site Plan application.

As identified in the pre-consultation comments, the following technical reports have been considered in our analysis:

- Urban Design Brief prepared by GSP Group dated February 2025;
- Vegetation Management Plan prepared by GSP Group dated February 2025;
- Functional Servicing Report prepared by Meritech Engineering dated January 2024;



Site Location
Source: Google Earth (2022)

Figure
1

- Stormwater Management Report prepared by Meritech Engineering dated January 2024;
- Archaeological Assessment Report prepared by Irvin Heritage dated December 2023
- Noise and Vibration Feasibility Study by HGC Noise Vibration Acoustics dated August 2025
- Preliminary Environmental Impact Statement by Natural Resource Solutions Inc. dated August 2025
- Transportation Impact Study Brief by Salvini Consulting dated July 2025

1.2 Purpose and Scope

This Report has been prepared in support of the Subject Applications and will provide planning justification for the proposed Zoning By-law Amendment and Draft Plan of Subdivision.

The objectives of this Report are as follows:

- To provide an overview of the Site, including site descriptions and surrounding uses;
- To provide a brief summary of the Subject Applications;
- To provide a summary of existing planning policies and regulations that apply to the Site; and,
- To provide a planning justification for the Subject Applications.

This Report also includes Appendix “A” which contains a draft text of the proposed Zoning By-law Amendment to amend the Township of Woolwich Zoning By-law 26-2024 in support of the Proposed Development.

2. Site Overview and Context

2.1 Site Location and Description

The Site is located on the east side of King Street North and south side of Printery Road and is municipally addressed as 1128 & 1134 Printery Road in the Village of St. Jacobs in the Township of Woolwich. The Site is legally described as PLAN 1502 LOT 3 & LOT 4. The Site is irregularly shaped, with a total area of approximately 9,915 square metres, with approximately 34 metres of frontage on King Street North and 116 metres of frontage on Printery Road. The Site has an approximate depth of 85 metres. Topographic imagery indicates that there is a slope on the Site from the north to south of approximately 2.50 metres.

1128 Printery Road currently contains a single-detached dwelling with a detached garage. 1134 Printery Road previously contained a single-detached dwelling, with accessory buildings including a detached barn, garage, and garden.

The Site is designated “Residential and Ancillary” and is within the Built-Up Area and Township Urban Area, which permits a wide variety of residential uses, including townhouses. The Site is zoned Residential (“R-1”), which does not permit townhouse dwellings.

2.2 Surrounding Land Uses

The surrounding land uses primarily consist of low-density residential uses to the north and east, agricultural uses to the south and west, and environmental features (woodland) to the east of the southern portion of the Site, as illustrated on **Figure 2**. Directly south of the Site is the Township Urban Boundary. The Site is located in proximity to existing and planned residential growth, including a large-scale subdivision located directly northeast of the Site.

Various community and institutional uses in St. Jacobs (illustrated on **Figure 2**) will serve the Proposed Development, including:

- St. Jacobs Public School;
- St. Jacobs Mennonite Church;
- St James Evangelical Lutheran Church;
- Region of Waterloo Library, St. Jacobs Branch;
- St. Jacobs Area;
- St. Jacobs Lions Hall;



- Woolwich Community Health Centre;
- Riverside Meadows Park;
- St. Jacobs Off Leash Dog Park; and,
- Health Valley Trail

2.3 Policy Context

The Site is currently designated in the Region of Waterloo Official Plan as:

- Delineated Built-Up Area on Map 1 – “Regional Structure” (see **Figure 3**); and,
- Township Urban Area on Map 2 – “Urban System” (see **Figure 4**).

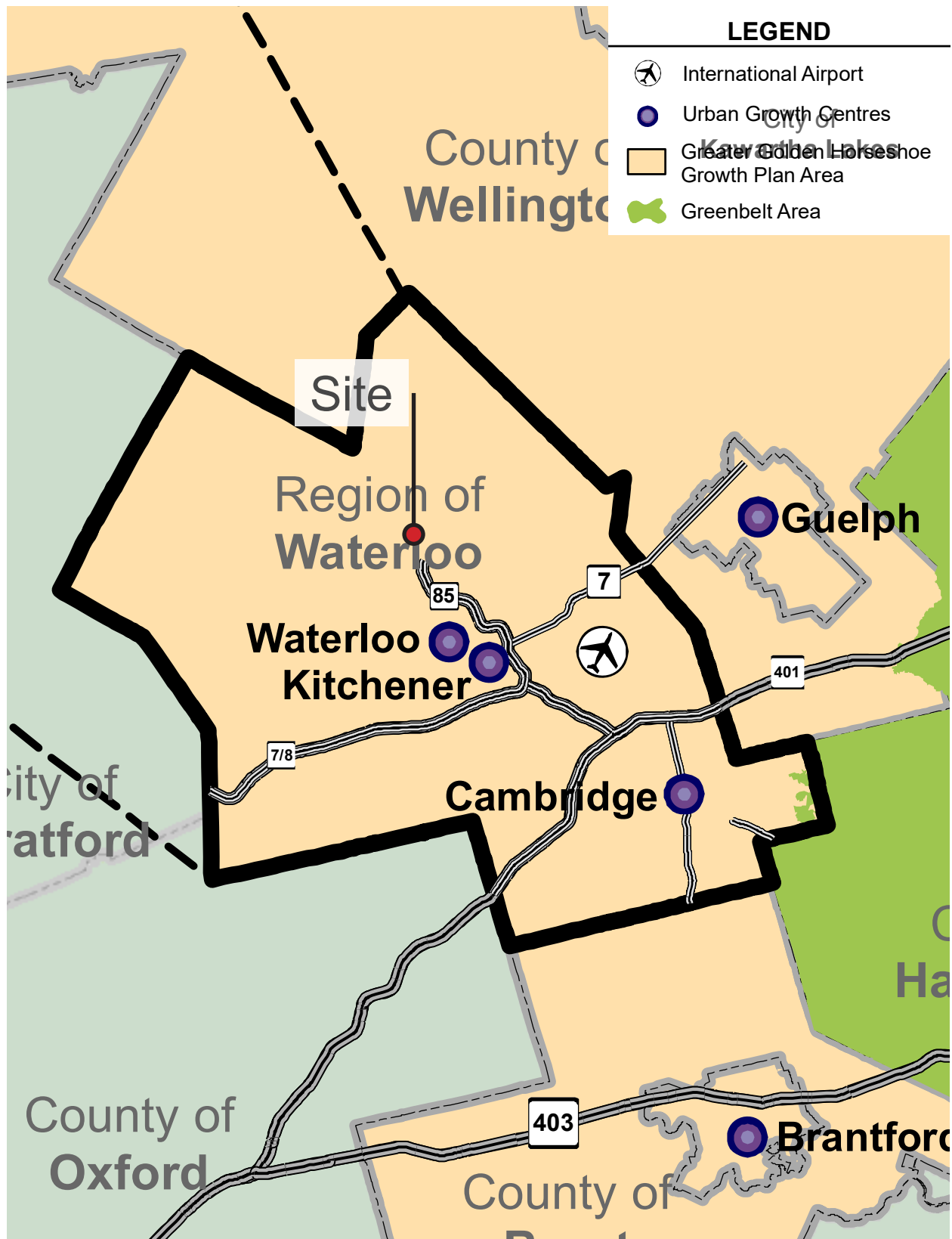
The Site is currently designated in the Township of Woolwich Official Plan as:

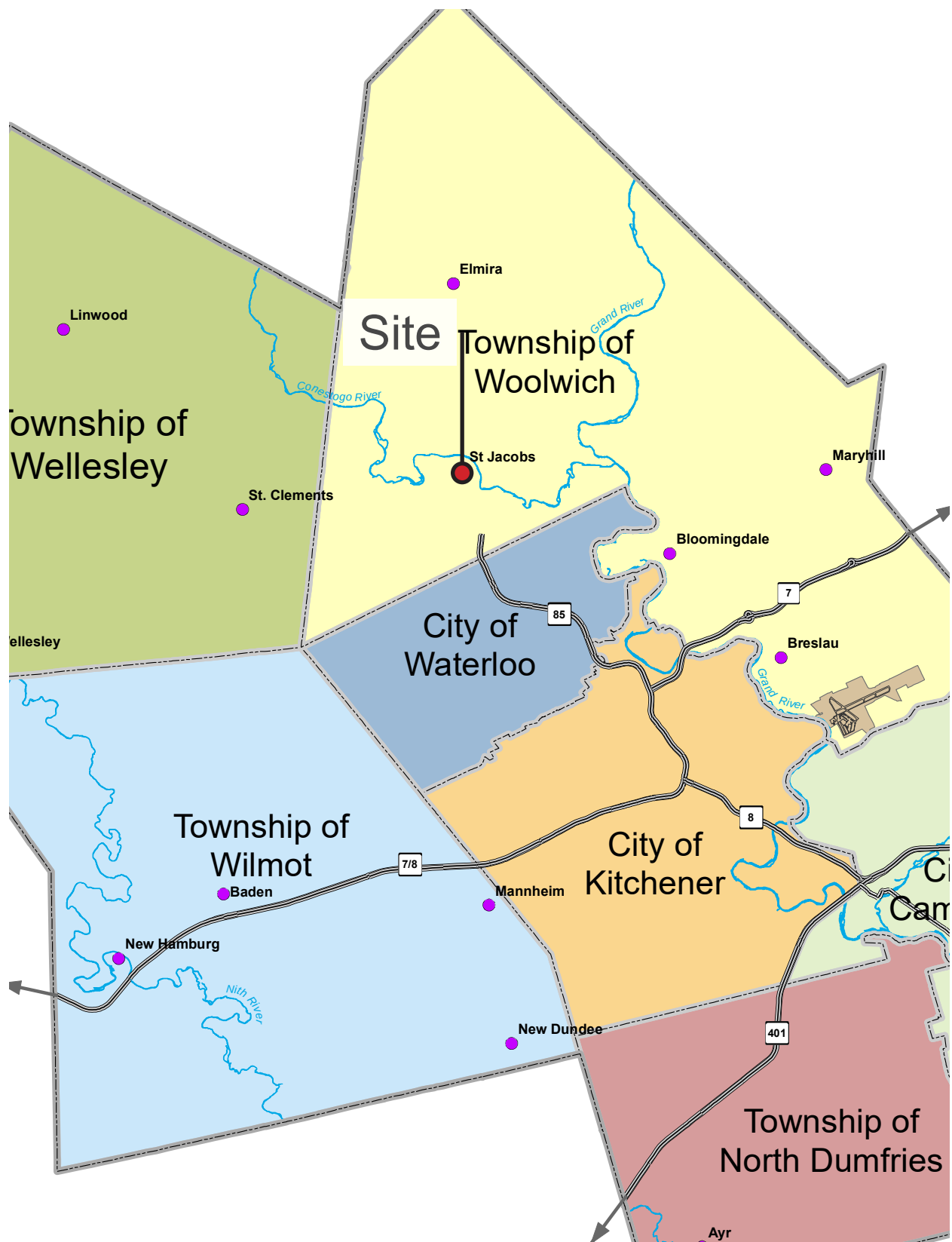
- Township Urban Area on Map 5.1 – “Township of Woolwich Planned Township Structure” (see **Figure 5**);
- Built-Up Area on Map 5.4 – “Township of Woolwich Urban Areas” (see **Figure 6**);
- Residential and Ancillary on Schedule ‘A’ – “Township of Woolwich Urban Area Settlement Plan, St. Jacobs Land Use” (see **Figure 7**);
- Township Road (Printery Road) on Schedule ‘B’ – “Township of Woolwich Urban Area Settlement Plan, St. Jacobs Transportation Network; and,
- Regional Road (King Street North) on Schedule ‘B’ – “Township of Woolwich Urban Area Settlement Plan, St. Jacobs Transportation Network.

The Township of Woolwich Zoning By-law 26-2024 identifies and zones the Site:

- Residential (“R-1”) on Schedule ‘B16’ – “Zoning Map: B16 – St. Jacobs” (see **Figure 8**).
 - o Described as a low-density zone with a limited range of housing types for areas on private services.

The Site is not within the regulatory limits of the Grand River Conservation Authority.

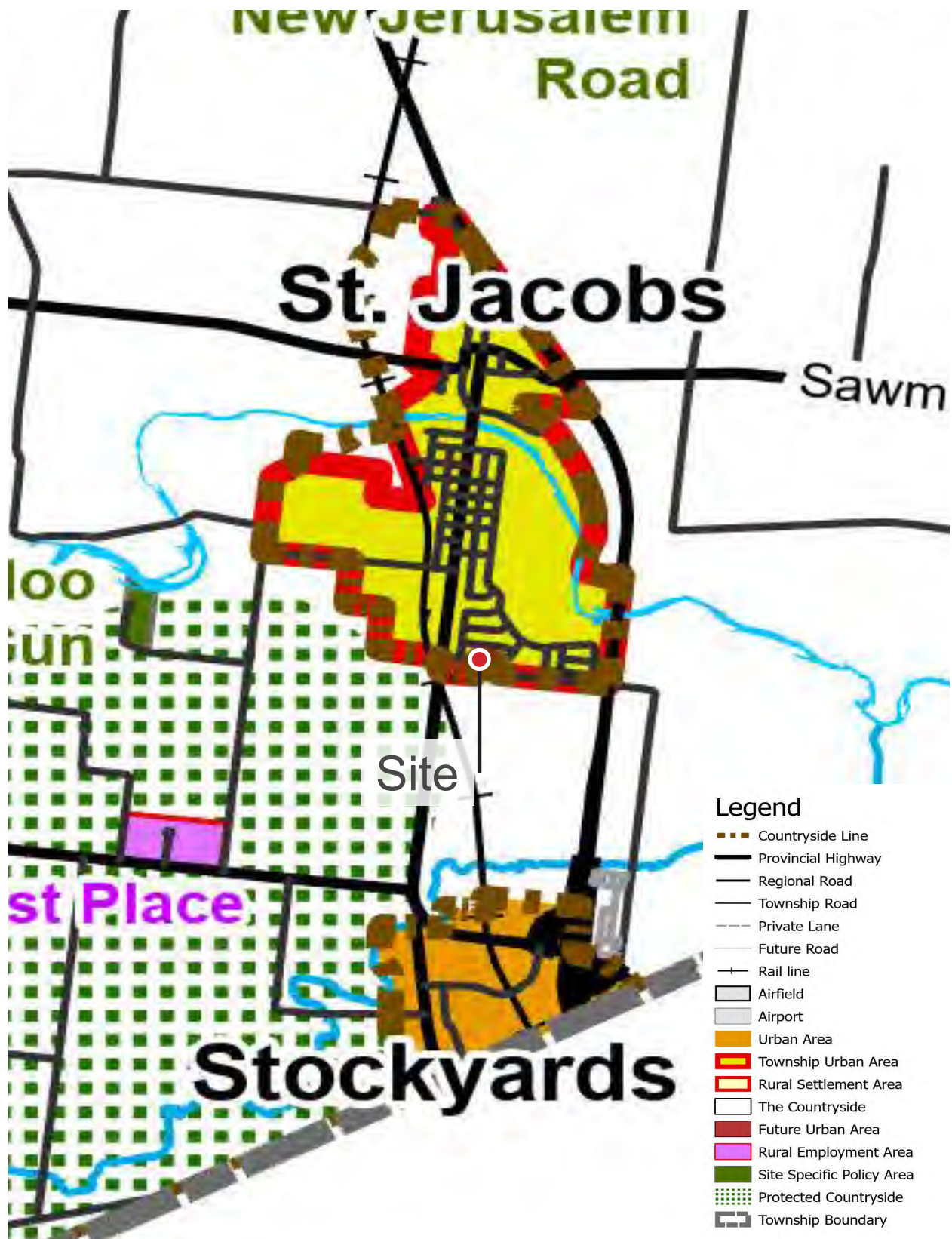




Region of Waterloo Official Plan - Area Municipalities

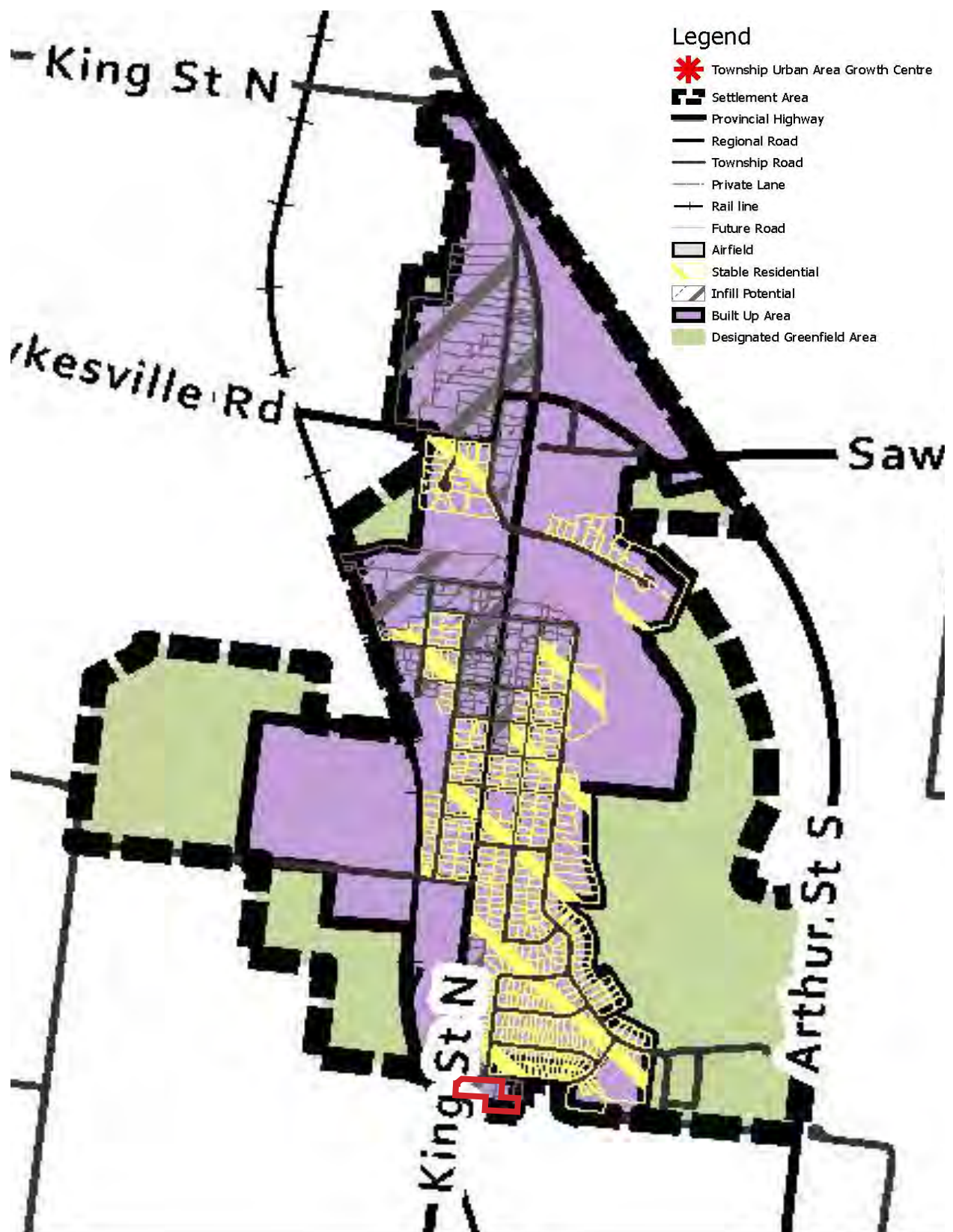
Source: Region of Waterloo Official Plan, Map 2, Area Municipalities (2015)

Figure
4



Township of Woolwich Official Plan -
Planned Township Structure

Figure
5







Source: Township of Woolwich Zoning By-Law, Map 16 (2024)

8

3. Proposed Development

The Proposed Development includes the creation of five townhouse blocks (two street fronting blocks and three blocks within a future condominium block, private amenity space for each unit, a private road, sidewalk, and private driveways, illustrated on **Figure 9**.

The Proposed Development will be split into two components, with the first component being the 11 street fronting townhouse dwellings with direct access to Printery Road and the second component containing a multiple residential development block for the development of 18 cluster townhouse dwellings. Submitted concurrently to the Draft Plan of Subdivision is a Zoning By-law Amendment application, which will permit the Proposed Development. The multiple residential block will be subject to a future Site Plan Approval and Draft Plan of Condominium approvals process.

In total, 29 units are proposed, with an overall density of 29.25 units per hectare. Access to the street fronting townhouses will be provided through private driveways to Printery Road. Access to the future condominium townhouses will be provided from a private road and sidewalk, which connect to Printery Road. At the southeast corner of the Site, Dripline Buffer Area is provided to provide naturalization adjacent to the locally significant woodland feature located off-site to the immediate east of the Subject Property.

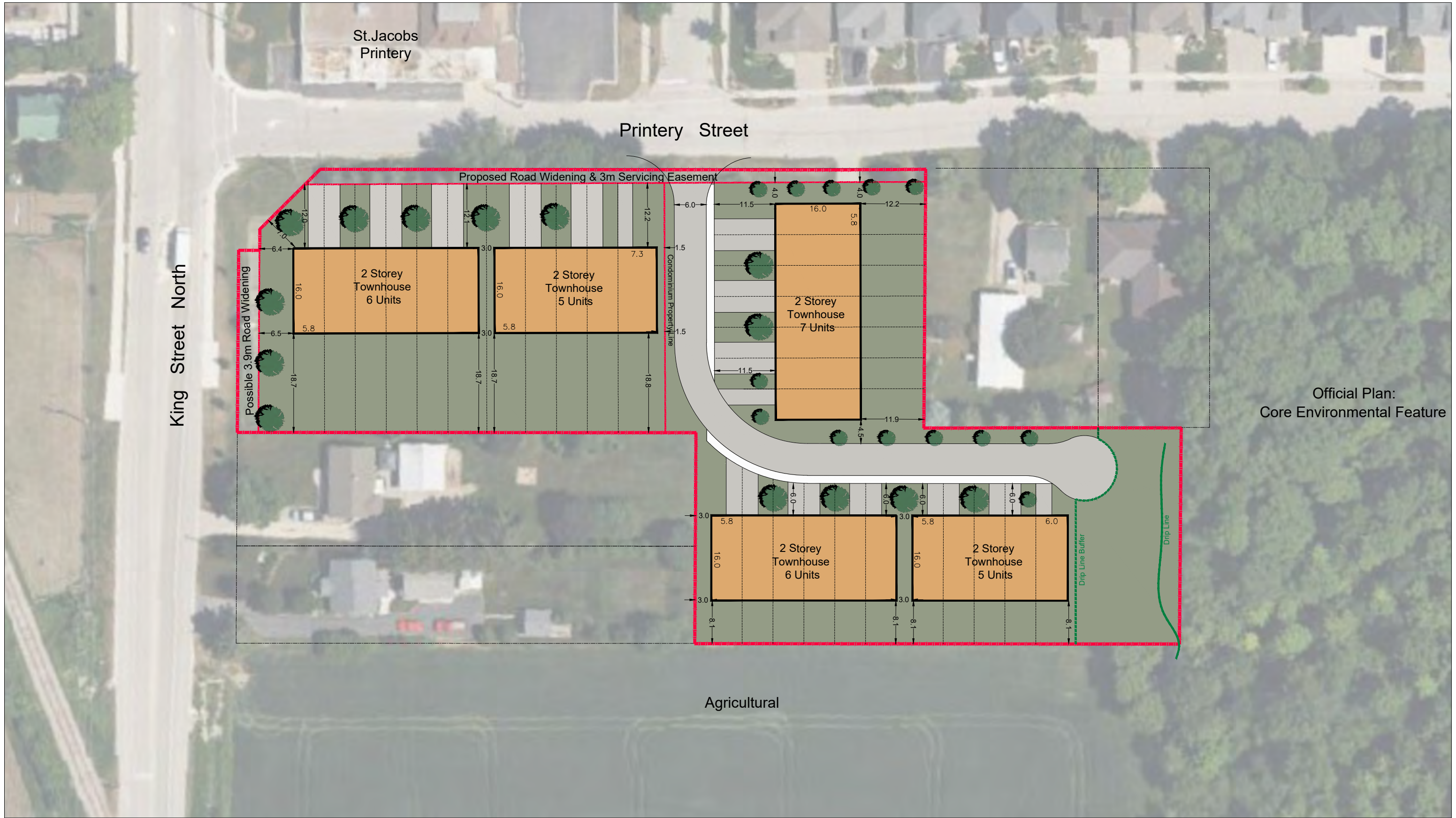
The Proposed Development intends to connect to existing municipal water services and sanitation services located proximally to the Site. A Stormwater Management Report and Functional Servicing Report were prepared in support of the Proposed Development and are summarized in Section 6.0 of this Report.

4. Planning Policy Overview

4.1 Planning Act

The *Planning Act R.S.O. 1990, c.P.13* (the “Planning Act”) establishes the framework for land use planning in the Province of Ontario. The Planning Act provides for the integration of provincial matters in planning decisions; details a planning process that is fair, accessible, timely and efficient; encourages cooperation and coordination amongst various interest groups; and recognizes the decision-making authority and accountability of municipal councils in the planning process.

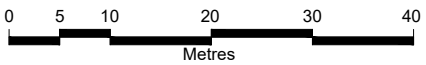
Section 1.1 of the Planning Act outlines the purpose of the Act, which are:



DEVELOPMENT CONCEPT

1128 & 1134 Printery Street, St. Jacobs

Site Area: 9,915m²
 Units: 29 Units
 Unit Size : 92.8m²



NOTE: This concept should be considered as a preliminary demonstration model that illustrates an 'order of magnitude' development scenario for the site. The number of units, floor area and parking supply are approximate and subject to more detailed design as well as municipal planning approvals.

Scale 1:750 | August 18, 2025 | Project No.: 21306 | Drawn By: EF



GSP
group

- a) to promote sustainable economic development in a healthy and natural environment with the policy and by the means provided under this Act;
- b) to provide for a land use planning system led by provincial policy;
- c) to integrate matters of provincial interest in provincial and municipal planning decisions;
- d) to provide for planning processes that are fair by making them open, accessible, timely and efficient;
- e) to encourage co-operation and co-ordination among various interests;
- f) to recognize the decision-making authority and accountability of municipal councils in planning.

4.1.1 Matters of Provincial Interest

Section 2 of the Planning Act identifies matters of provincial interest which the Minister, municipality, local board, planning board, and Tribunal must “have regard to” fulfilling its responsibility under the Planning Act. Matters of provincial interest are addressed in relation to the Proposed Development below:

Planning Act, Section 2 - Matters of Provincial Interest		
No.	Policy	Assessment
(a)	the protection of ecological systems, including natural areas, features, and functions;	The Site does not contain any natural features. The adjacent woodlot has been assessed in terms of boundary trees and are noted to be protected by the proposed 10m buffer natural area as provided in the conceptual site plan.
(b)	the protection of the agricultural resources of the Province;	The Site is designated Residential and Ancillary in the Township of Woolwich Official Plan, meaning the Site is located in an area planned for residential development.
(e)	the supply, efficient use and conservation of energy and water;	The Proposed Development will be connected to existing municipal water services and sanitation services which have sufficient capacity to accommodate the Proposed Development. An intensification of the site is supportive of the conservation of energy and water.

(f)	the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	During the Site Plan process, applicable utility providers, the Township, and Region will provide commentary regarding communication, transportation, sewage and water services, and waste management systems.
(h)	the orderly development of safe and healthy communities;	The Site is designated Residential and Ancillary in the Township of Woolwich Official Plan and is located adjacent to an already established and growing residential subdivision. As such, the Proposed Development will contribute to the orderly development of safe and healthy communities.
(h.1)	the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	The Proposed Development will be consistent with the requirements set out in the <i>Accessibility for Ontarians with Disabilities Act, S.O. 2005, c. 11</i> and <i>O. Reg. 332/12</i> (Ontario Building Code, 2012 and 2024).
(i)	the adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	The Proposed Development will make use of existing educational, health, social, cultural, and recreational facilities in St. Jacobs and the broader Township of Woolwich and Region of Waterloo.
(j)	the adequate provision of a full range of housing, including affordable housing;	The Proposed Development will provide for 29 townhouse dwellings, which will contribute to a full range of housing in the broader context of the Village of St. Jacobs, Township of Woolwich, and Region of Waterloo.
(l)	the protection of the financial and economic well-being of the Province and its municipalities;	The Proposed Development will utilize existing available infrastructure, avoiding an uneconomical expansion of such services.
(m)	the co-ordination of planning activities of public bodies;	The Subject Applications will be circulated to all commenting agencies and stakeholders by the Township for review and comments prior to Council rendering a decision on the proposed planning applications.

(n)	the resolution of planning conflicts involving public and private interests;	Resolution of planning conflicts that may arise through consideration of the Subject Application will be addressed as part of the circulation and review process, which will include formal public meeting(s).
(p)	the appropriate location of growth and development;	The Site is designated Residential and Ancillary in the Township of Woolwich Official Plan and is also located within the Township Urban Boundary. As such, it is an area where residential growth is planned for and is an appropriate location for residential growth and development.
(r)	The promotion of a built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant;	The Proposed Development incorporates a well-designed built form that maintains the streetscape and character of the surrounding area, respecting surrounding uses, and contributes to a sense of place.
(s)	the mitigation of greenhouse gas emissions and adaptation to a changing climate.	The Proposed Development contains pedestrian-oriented infrastructure, including a sidewalk, which promotes active transportation.

4.1.2 Consistency with Policy Statements

Section 3(5) of the Planning Act requires that all decisions of municipal councils regarding the exercise of authority concerning planning matters “*shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision*” and “*shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be.*” The *Provincial Planning Statement* is applicable and relevant with respect to the Subject Application. The *Greenbelt Plan*, *Oak Ridges Moraine Conservation Plan*, *Niagara Escarpment Plan* and *Metrolinx Act* along with associated policy statements do not apply to the Site.

4.1.3 Plan of Subdivision Approvals

When considering a Draft Plan of Subdivision application, Subsection 51(24) of the Planning Act states that “*regard shall be had, among other matters, to the health, safety,*

convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality,” as well as to a set of criteria which are addressed in relation to the Proposed Development below:

Planning Act, Subsection 51(24) – Plan of Subdivision Approvals		
No.	Policy	Assessment
(a)	the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The Proposed Development has regard to Matters of Provincial interest, as referred to in Section 2 of the Planning Act, which is addressed above in Section 4.1.1 of this Report.
(b)	whether the proposed subdivision is premature or in the public interest;	The Site is designated Residential and Ancillary in the Township of Woolwich Official Plan, meaning it is in a location where residential development is planned for and preferred.
(c)	whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The Proposed Development conforms to the Township of Woolwich Official Plan. There are currently no plans of subdivision directly adjacent to the Site.
(d)	the suitability of the land for the purposes for which it is to be subdivided;	The Site is located within the Township Urban Boundary and is designated for residential development.
(f)	the dimensions and shapes of the proposed lots;	The proposed dimensions and shapes of the proposed lots are rectangular in shape and are of adequate size to support each respective unit’s viability and function.
(i)	the adequacy of utilities and municipal services;	A Functional Servicing Report has been prepared by Meritech Engineering, which concludes that the Proposed Development can be adequately serviced by existing municipal water and sanitation services. Similarly, other applicable utility companies will be consulted with and will provide commentary on the Proposed Development during the Site Plan submission.
(j)	the adequacy of school sites;	The Proposed Development will be serviced by St. Teresa Elementary School (Catholic elementary), St. Jacobs Public

		School (public elementary), St. David Catholic Secondary School (Catholic secondary), and Elmira District Secondary School (public secondary). As such, it is anticipated that there are adequate school sites available to accommodate the Proposed Development.
(k)	the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	A limited amount of land may be conveyed to the Region of Waterloo as a King Street Road widening. Cash-in-lieu of parkland dedication is proposed and no other land is to be conveyed.
(l)	the extent to which the plan's design optimizes the available supply, means of supplying, efficient use, and conservation of energy; and	Opportunities to incorporate energy conservation measures will be considered and reviewed during detailed design, including site servicing and the eventual application and issuance of building permits.

In sum, the Proposed Development is in an area planned for and designated for residential growth within the Township's urban boundary. It includes 29 townhouse dwellings which will be supported by existing municipal water services, sanitation services, and utility services, avoiding unnecessary and uneconomical infrastructure expansion. The development will be serviced by nearby educational, recreational, health, and social facilities, and its design respects adjacent uses including the adjacent significant woodlot. Overall, the Proposed Development and Subject Applications have regard for applicable matters of Provincial interest, is consistent with applicable policy statements, and has regard for applicable criterion for plan of subdivision approvals.

Based on the above-noted policy analysis, the Proposed Development and Subject Applications conform to the policies outlined in the Planning Act.

4.2 Provincial Planning Statement - 2024

The 2024 Provincial Planning Statement ("PPS") provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use planning that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS was released on October 20, 2024, and replaced the previous Provincial Policy Statement (2020) and consolidated A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019). The PPS is issued under Section 3 of the Planning Act and requires that all planning matters be consistent with the PPS.

The PPS supports the province's target of building 1.5 million homes by 2031 and includes direction for matters relating to increasing housing supply, making land available for development, planning for appropriate infrastructure, and protecting the natural environment and agricultural lands.

4.2.1 Building Homes, Sustaining Strong and Competitive Communities

Chapter 2 of the PPS relates to building homes, sustaining strong and competitive communities. **Section 2.1** of the PPS relates to planning for people and homes. **Policy 2.1.6** of the PPS states: *"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..."*

Response: The Proposed Development contains 29 townhouse dwellings, which contributes to the accommodation of an appropriate range and mix of housing options to the broader neighbourhood's range and mix of land uses.

Section 2.2 of the PPS relates to housing. **Policy 2.2.1** of the PPS states: *"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:*

- 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...”

Response: The Proposed Development contains 29 townhouse dwellings, which contributes to the provision of housing options required to meet the social, health, economic and wellbeing requirements of current and future residents (b.1). The Site previously contained two single-detached dwellings, one on each respective lot. As such, the Proposed Development will intensify the Site while being respectful of surrounding uses (b.2). The Proposed Development densifies the overall Site while efficiently using the land’s area, existing municipal infrastructure, and utilities, and contains a sidewalk which supports active transportation within the Site (c).

Section 2.3 of the PPS relates to settlement areas. **Section 2.3.1** of the PPS outlines the general policies for settlement areas. **Policy 2.3.1.1** of the PPS states that settlement areas shall be the focus of growth and development. **Policy 2.3.1.2** of the PPS states that land use patterns within settlement areas should be based on densities and a mix of land uses which: efficiently use land and resources (a); optimize existing and planned infrastructure and public service facilities (b); and support active transportation (c) [...].

Response: The Site is located within the Township Urban Area, and is thus within the settlement area, which is the focus area for growth. The Proposed Development respectfully intensifies the Site, proposing 29 townhouse dwellings while efficiently using the Site’s area to maximize its highest and best use (a), will use existing municipal infrastructure and utilities (b), and supports active transportation on the Site with the inclusion of an internal sidewalk (c).

Policy 2.3.1.3 of the PPS states: *“Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.”*

Response: As mentioned previously, originally the Site contained two single-detached dwellings, one on each respective lot. The Proposed Development consists of 29 townhouse dwellings, which will intensify the Site in a form that is respectful of surrounding uses while contributing to a range and mix of housing options that utilize existing infrastructure and facilities.

4.2.2 Infrastructure & Facilities

Chapter 3 of the PPS relates to infrastructure and facilities. **Section 3.1** of the PPS outlines the policies for infrastructure and public service facilities. **Policy 3.1.1** of the PPS states: “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:

- b) leverage the capacity of development proponents, where appropriate; and
- c) are available to meet current and projected needs.”

Response: The Proposed Development will utilize existing municipal water services and sanitation services, as well as other necessary utilities (b), which have sufficient capacity to accommodate the Proposed Development (c).

Policy 3.1.2 of the PPS states: “Before consideration is given to developing new infrastructure and public service facilities:

- b) the use of existing infrastructure and public service facilities should be optimized...”

Response: The Proposed Development will utilize existing municipal water services and sanitation services which have sufficient capacity to support the Proposed Development.

Section 3.6 of the PPS outlines the policies for sewage, water, and stormwater. **Policy 3.6.1** of the PPS states: “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...”

Response: The Proposed Development will utilize existing municipal water services and municipal sanitation services which are proximal to the Proposed Development (a) and have sufficient capacity to support the Proposed Development (b.1.). As existing infrastructure is located adjacent to the Site, uneconomical expansion of infrastructure is avoided and therefore is financially viable (b.2). Municipal services are the preferred way of servicing for settlement areas to support the protection of the environment and minimize potential risks to human health and safety (b.3). The Proposed Development will align with any applicable comprehensive municipal planning for these services (b.3).

Policy 3.6.2 of the PPS states: *“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.”*

Response: As outlined in the Functional Servicing Report prepared by Meritech Engineering, the Proposed Development will utilize existing municipal water services and sanitation services, as well as other applicable utilities, which have sufficient capacity to support the Proposed Development.

Section 3.9 of the PPS relates to public spaces, recreation, parks, trails, and open space.

Policy 3.9.1 of the PPS states: *“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...”*

Response: The Proposed Development includes an internal sidewalk, being pedestrian-oriented infrastructure which supports active transportation (a). The Proposed Development includes a natural buffer area at the southeast corner of the Site, while this area is not proposed for active or passive recreational uses, it will support the long-term health of a natural area within proximity to the Proposed Development (b).

The Proposed Development includes 29 townhouse dwellings which efficiently use the Site's area, replacing two existing single-detached dwellings to respectfully intensify the Site while contributing to a range and mix of housing options. The Proposed Development will utilize existing municipal water services and sanitation services, as well as other applicable utilities, avoiding the uneconomical expansion while utilizing the preferred form or servicing for settlement areas. The Proposed Development also contains an internal sidewalk to promote active transportation within the Site as well as private rear yard amenity space for each unit providing an accessible space for recreation.

As such, the Proposed Development and Subject Applications are consistent with the policies of the Provincial Planning Statement (2024).

4.3 Region of Waterloo Official Plan

As of January 1, 2025, the Regional Municipality of Waterloo (the Region) is an upper-tier municipality without planning responsibilities. As a result, the Regional Municipality of Waterloo Official Plan (the ROP) in effect is now deemed to constitute an Official Plan for the Township of Woolwich Official Plan as per Section 70.13 (2) of the Planning Act, until the time Township revokes or amends it to provide otherwise.

The Regional Official Plan ("ROP") was adopted by the Region of Waterloo in June 2009 and received final approval from the Ontario Municipal Board on June 18, 2016. The ROP provides policy direction on planning matters for the Region and includes policy changes and amendments since the adoption of the Regional Official Policies Plan in 2009. On August 18, 2022, Regional Official Plan Amendment No. 6 was adopted. This recent amendment is reflected and considered in this Report.

Within the ROP, the Site is designated within the Delineated Built-Up Area (**Figure 3** above) and is Township Urban Area (**Figure 4** above).

4.3.1 Where and How to Grow

Chapter 2 of the ROP relates to where and how to grow. **Section 2.A** of the ROP relates to managing population and employment growth. **Table 1 of Section 2.A** provides regional population and employment forecasts, and states that the Township of Woolwich will have an overall 2051 population of 51,200.

Response: The Proposed Development provides 29 townhouse dwellings, which will support the Region's population target of 51,200 residents by 2051. As per Statistics Canada's 2021 Census for St. Jacobs (population centre), the Village of St. Jacobs has an average household size of 2.5, meaning the Proposed Development will accommodate

approximately 72.5 (73) residents upon its final construction and occupancy. Alternatively, the Region of Waterloo typically assigns 2.44 persons per unit (ppu) for townhouse dwellings which would equate to approximately 70.7 persons.

Section 2.C.2 of the ROP provides the policies for urban areas. **Policy 2.C.2.1** of the ROP states that the lands included within the Urban Area will accommodate the largest share, almost 90 percent, of the Region’s population and employment growth.

Response: The Proposed Development will contribute toward residential growth within the Township Urban Area.

Policy 2.C.2.2 of the ROP states: “Area municipalities will develop official plan policies and implementing zoning by-laws, and other planning documents or programs to ensure that development occurring within the Urban Area is planned in a manner that:

a)	Implements the Regional urban system described in the Plan;	The Proposed Development is located in an area (Delineated Built-Up Area (Township Urban Area)) that is prioritized by the ROP for the highest levels of growth and development, which contributes to the implementation of the Regional urban system described in the ROP;
b)	Advances the community’s transition into an energy-efficient, resilient, low-carbon community by:	The Proposed Development advances the community’s transition into an energy-efficient and resilient community by:
(i)	Promoting a more compact built form that enables a modal shift to most trips being made by walking, cycling, and rolling;	Proposing a compact built form through the development of 29 stacked townhouse dwellings, which are considered a more sustainable form of development compared to lower density alternatives, like single-detached dwellings, while providing pedestrian amenities, including an internal sidewalk, which provides opportunities for active transportation;

(ii)	<i>Contributing to the creation of 15-minute neighbourhoods;</i>	The Proposed Development contributes 29 residential dwelling units in the form of street fronting townhouses and condominium townhouses toward the creation of 15-minute neighbourhoods.
(iii)	<i>Reducing air pollution and achieving the greenhouse gas emission reduction targets of this Plan;</i>	The Proposed Development is in the form of townhouses, which are a denser form of development compared to single-detached dwellings. Overall, townhouses are considered an eco-friendlier housing option compared to traditional low-density development due to the density provided.
(iv)	<i>Improving resilience to extreme heat, increased precipitation, increased frequency of extreme weather events and other impacts of a changing climate;</i>	The Proposed Development is consistent with surrounding development and has been designed to be resilient to extreme weather events, such as increased precipitation and extreme heat. A comprehensive landscape plan has been prepared in support of the Proposed Development, which will increase tree canopy on the Site at the time of tree maturity. Additionally, a stormwater management plan has been prepared which confirms that the Proposed Development will adequately manage stormwater quantity and quality.
(v)	<i>Integrating green infrastructure and appropriate low impact development;</i>	The Proposed Development is supported by a preliminary stormwater management report prepared by Meritech Engineering that proposes Stormwater management to be provided with storm detention for the condominium block. The storm servicing and stormwater management will be in accordance with Township and Regional requirements.

(vi)	<i>Promoting building designs and orientations that maximize renewable energy generation and conservation, including the use of alternative and/or renewable energy systems, and the creation of net-zero operational carbon buildings;</i>	The Proposed Development does not provide any renewable energy generation and is not considered net-zero construction.
(vii)	<i>Ensuring that any new development requiring site plan or plan of subdivision approval under the Planning Act meets the requirements of the area municipality's High Performance Development Standards adopted in accordance with Policy 2.B.1.2 of this Plan;</i>	To be discussed during detailed design and Site Plan Approval.
(viii)	<i>Maximizing tree canopy for shaded areas and community greening within delineated built-up areas and designated greenfield areas; and</i>	The Proposed Development will be supported by a comprehensive landscape plan and a natural area buffer block to contribute to the overall tree canopy and community greening efforts within the delineated built-up area;
(ix)	<i>Supporting, and, where enabled, requiring all new buildings to be built to achieve net-zero operational carbon, and to implement measures to minimize embodied carbon and building energy needs, support the energy transition off fossil fuels, and increase energy resiliency;</i>	The Proposed Development does not provide any renewable energy generation and is not considered net-zero construction.
(c)	<i>Is serviced by a municipal water and wastewater system, except where specified in accordance with Policy 2.J.8;</i>	The Proposed Development will be fully serviced by existing municipal water services and sanitation services, as well as other applicable utilities, which have

		sufficient capacity to accommodate the Proposed Development;
(d)	<i>Protects the natural environment, including the Grand River and its tributaries, and surface water and groundwater resources in accordance with the policies in Chapter 7 and 8;</i>	The Site is designated for residential development and will have no impact on the natural environment, the adjacent woodlot is to be protected by a 10m buffer;
(e)	<i>Provides a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes, in accordance with all the applicable policies of this Plan;</i>	The Proposed Development provides 29 townhouse dwellings, which contributes to a range and mix of housing options in the neighbourhood. Townhouses are considered more affordable compared to other traditional forms of housing, like single-detached dwellings;
(f)	<i>Conserves cultural heritage resources and supports the adaptive reuse of built heritage resources in accordance with the policies in Chapter 3;</i>	There are no cultural heritage resources on the Site.
(g)	<i>Avoids development and land use patterns that may pose a risk to public health, safety and the environment;</i>	The Proposed Development is consistent with surrounding development and does not pose a risk to public health, safety, and the environment.
(h)	<i>Improves accessibility for persons of all ages and abilities and at all times of year by addressing built form barriers which restrict their full participation in society;</i>	The Proposed Development will be compliant with the Accessibility for Ontarians with Disabilities Act, 2005.
(i)	<i>Ensures the development of high quality urban form through site design and urban design standards</i>	The Proposed Development represents a high-quality urban form which contributes to an attractive and vibrant public realm.

	<i>that create an attractive and vibrant public realm;</i>	The street fronting townhouse blocks, respectively, help to frame Printery Road while ensuring sight triangles are maintained at the corner of Printery Road and King Street North and the intersection of Printery Road and the Proposed Development. The proposed driveway connects and generally aligns to the existing intersection at Printery Road and Maplelawn Drive, limiting the number of intersections along Printery Road which contributes to pedestrian and vehicular safety.
(k)	<i>Considers the wellbeing and belonging of all children and youth; and</i>	The Proposed Development is consistent with surrounding development. Each lot contains ample private rear yard amenity space which allows opportunities for children and youth to play, increasing wellbeing.
(j)	<i>Expands residents' convenient access to:</i>	The Site is proximal to Grand River Transit stops (Route 21 – Elmira), which provides connection to Conestoga Station and GRT's broader network. The Proposed Development includes an internal sidewalk network which provides connection to Printery Street to the north, providing a safe, comfortable, and convenient environment for walking, cycling, and rolling. The Proposed Development will be ploughed during winter, with appropriate surface treatments such as salt, which will contribute to the utilization of the Site for active transportation during winter.
(i)	<i>A range of transportation options, including to a mobility network that is safe, comfortable and convenient for walking, cycling, and rolling for people of all ages and abilities and at all times of year;</i>	

(ii)	<i>Public service facilities, co-located and integrated in community hubs;</i>	The Proposed Development will utilize existing public service facilities within the community.
(iii)	<i>An appropriate supply of safe, publicly-accessible urban greenlands, open spaces, parks, trails, and other opportunities for recreation in accordance with the policies in Chapter 3; and</i>	The Proposed Development provides for individual amenity areas for each of the units allowing for access to outdoor open space.
(iv)	<i>Healthy, local, and affordable food options in neighbourhoods, supported through urban agriculture and a thriving food system built on local farming, and food production and processing that feeds much of the community in accordance with the policies in Chapter 3;</i>	The Proposed Development does not propose any healthy, local, and/or affordable food options on the Site, however, ample space private rear yard amenity space is provided on Site which can allow for the provision of urban agriculture.

Section 2.E.1 of the ROP provides the policies for the township urban area. **Policy 2.E.1.1** of the ROP states: *“Township Urban Areas are designated as shown on Map 1. This designation contains the central urban areas of the Townships of [...] Woolwich that are not part of the city Urban Area. The lands included within this designation are intended to serve as the focus for growth outside of the Urban Area within the planning horizon of this Plan.”*

Response: The Site is located within the Township Urban Area, and as such, this area is the focus for growth within the Village of St. Jacobs.

Section 2.F of the ROP provides intensification targets in delineated built-up areas. **Policy 2.F.2** of the ROP states that: *“area municipalities, in collaboration with the Region, will develop and adopt a strategy to meet or exceed the minimum intensification targets set out in Table 3, and intensification more broadly throughout the delineated built-up areas, which will:*

(b)	<i>identify the appropriate type and scale of development in each of the area municipality's strategic growth areas and transition of built form to adjacent areas;</i>	The Proposed Development is a context-sensitive development that provides gentle intensification and an appropriate transition to adjacent single-detached dwellings. The proposed zoning by-law amendment will enable Proposed Development, which will contribute to the achievement of 15-minute neighbourhoods through the provision of 29 townhouse units.
(c)	<i>enable intensification more broadly throughout the area municipality's delineated built-up area through gentle density and other missing middle housing options;</i>	
(d)	<i>ensure lands are zoned and development is designed in a manner that supports the achievement of 15-minute neighbourhoods;</i>	

Table 3 of Section 2.F states that the Township of Woolwich should have a minimum intensification target of 20% and 1,620 total minimum units in the built-up area from 2022-2051.

Response: The Proposed Development includes 29 townhouse dwellings, which will support the Region's goal of a minimum intensification target of 20% and the provision of a minimum of 1,620 units by 2051.

4.3.2 Liveability in Waterloo Region

Chapter 3 of the ROP relates to liveability in Waterloo Region. The liveability of a region is based not only on its design and infrastructure, but also on how these elements are used to help the region become a desirable, accessible, and safe community that places a significant importance on providing choice and maintaining and fostering a high quality of life.

Section 3.B of the ROP relates to walking and cycling. **Policy 3.B.3** of the ROP states: "Area Municipalities are encouraged to enhance pedestrian and cycling environments so that people have more opportunities to walk and cycle for convenient travel, recreational, health, environmental and economic reasons through such means as:

- b) Integrating pedestrian and cycling facilities into existing, expanded, and new development areas..."*

Response: The Proposed Development includes an internal sidewalk, which will provide opportunities to walk to and from the internal dwellings in the Site to Printery Road and the larger surrounding community.

In sum, the Proposed Development consists of 29 stacked townhouse dwellings, which contributes to the Region's population and intensification targets, accommodating approximately 70 residents while simultaneously providing compact, dense development that is respectful of its surrounding context. The Proposed Development prioritizes pedestrian-friendly infrastructure through the inclusion of an internal sidewalk and it represents a well-designed urban form with an abundance of landscaped open space and tree plantings which contributes to stormwater filtration and infiltration as well as an enhanced tree canopy.

Overall, the Proposed Development is consistent with the policies of the Regional Official Plan.

4.4 Woolwich Township Official Plan

The Woolwich Township Official Plan (the "Official Plan") was approved with modifications and deferrals by the Region of Waterloo on June 22, 2022, and was adopted through By-law 55-2021. The Woolwich Township Official Plan provides direction for development initiated by both the public and private sectors, and its land use strategies and policies are the tools that allow the Township to manage change toward a desired future.

Within the Official Plan, the Site is designated Township Urban Area, Built-Up Area, and Residential and Ancillary (see **Figure 5**, **Figure 6**, and **Figure 7** above).

4.4.1 Planned Township Structure

Chapter 5 of the Official Plan relates to the planned township structure. **Section 5.1** of the Official Plan provides the basis for the township structure. **Policy 5.1.2** of the Official Plan relates to township urban areas, and states: *"The Elmira and St. Jacobs Township Urban Areas are illustrated on Map 5.1 of this Plan. Lands within the Township Urban Area will be planned to accommodate a broad range and mix of land uses and, together with the Urban Areas, will serve as the focus for population and employment growth in the Township to 2031. Future development in the Elmira and St Jacobs Township Urban Areas will be in accordance with the specific policies outlined in Section 7 of this Plan."*

Response: The Site is located within the Township Urban Area. The Proposed Development includes 29 townhouse dwellings, which will contribute to a range and mix of housing options, and a range and mix of land uses in the context of the Village of St. Jacobs and broader Township of Woolwich and Region of Waterloo. The policies outlined in Section 7 will be discussed in **Section 4.4.2 of this Report**.

Section 5.3 of the Official Plan outlines the population and forecasts for the Township. **Policy 5.3.1, Table 1** of the Official Plan states that the Township will have an overall population of 36,500 by 2031.

Response: The Proposed Development will include 29 stacked townhouse dwellings. As per Statistics Canada's 2021 Census for St. Jacobs (population centre), the Village of St. Jacobs has an average household size of 2.5, meaning the Proposed Development will accommodate approximately 72.5 (73) residents upon its final construction and occupancy, which will contribute to the Township of Woolwich's target of 36,500 people by 2031.

Section 5.5 of the Official Plan outlines the general policies for the St. Jacobs Township Urban Area. **Policy 5.5.1** states that: *"In preparing or reviewing planning studies, or in reviewing development applications or site plans, the Township will ensure that development occurring in the Elmira and St. Jacobs Township Urban Areas will be planned and developed in conformity with sections a) to h) of Policy 5.4.1."* which states: *"In preparing or reviewing planning studies, or in reviewing development applications or site plans, the Township will ensure that development occurring within the Breslau and Stockyards Urban Areas [applicable to St. Jacobs Township Urban Area] will be planned and developed in a manner that:*

- a) Supports the Planned Township Structure defined in this Plan;*
- b) Uses municipal water and wastewater systems unless otherwise identified in this Plan;*
- c) Contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit in addition to motor vehicles;*
- d) Protects the natural environment, surface water and ground water resources;*
- f) Respects the scale, physical character, and context of established neighbourhoods in areas where reurbanization is planned to occur..."*

Response: The Proposed Development will be planned and developed in a manner that:

- a) Supports the Planned Township Structure defined in the Official Plan as it intends to develop 29 townhouse dwellings on lands suitably designated for residential development and intensification;
- b) Will utilize existing municipal water services and sanitation services, and other applicable utilities, which have sufficient capacity to accommodate the Proposed Development;
- c) The Proposed Development will contribute to the creation of a complete community through the development of 29 townhouse dwellings, with a density of approximately 29.25 units per hectare, accommodating 70+ residents, while supporting active transportation through the inclusion of an internal sidewalk and common amenity area. This contributes to a range and mix of densities in the surrounding neighbourhood, and a range and mix of land uses in the broader context of the Village of St. Jacobs, Township of Woolwich, and Region of Waterloo;
- d) The Site is designated for residential development and the Proposed Development is not anticipated to have any impact on the natural environment, surface water and/or groundwater resources. Further, an environmental buffer area has been proposed to the adjacent (albeit off-site) significant woodlot;
- f) The Proposed Development respects the scale, physical character, and context of the surrounding established neighbourhoods. All of the proposed townhouse blocks are limited to 2-storeys in height, which is consistent with surrounding residential uses. The townhouse blocks fronting Printery Road have a rear yard setback of 18.7 metres to the rear lot line, which provides adequate buffering between adjacent residential uses to the south and exceeds the rear yard setback requirements in the Zoning By-law. The townhouse block fronting the private driveway on the east side of the Site closest to Printery Road has a setback of 11.9 metres, which exceeds the required setback of the Zoning By-law. Finally, the two townhouse blocks fronting the private driveway located closest to the southern lot line of the Site have rear yard setbacks of 8.1 metres, provides adequate buffering between adjacent agricultural uses to the south and exceeds the rear yard setback requirements in the Zoning By-law. Overall, adequate distance is provided between the Proposed Development and any adjacent dwellings.

For reference, the required minimum rear yard setback is 7.0 metres for R-5 to R-7 Zones and 7.5 metres for R-1 to R-4 Zones.

The Proposed Development is consistent in massing, scale, and layout to adjacent residential uses.

Section 5.6 of the Official Plan relates to the reurbanization target. **Policy 5.6.1** of the Official Plan states: *“In accordance with the Regional Official Plan, new residential development occurring within the built-up areas of the Urban Areas and Township Urban Areas will be counted towards the achievement of the Region’s minimum annual residential reurbanization target of 45 percent. This target applies to the Region of Waterloo as a whole and will be measured by the Region on average across the entire built-up area designated in the Regional Official Plan.”* Further to this, **Policy 5.6.2** states: *“The Township will contribute to achieving the Region’s minimum annual residential reurbanization target, starting in 2015 and for each year thereafter, by planning to achieve a minimum annual reurbanization target of 20 percent within the Township.”*

Response: As the Proposed Development is occurring in the Township Urban Area, it will contribute 29 dwelling units (housing approximately 70 residents) toward the Region of Waterloo’s minimum annual residential reurbanization target of 45 percent, including the Township’s contribution of a minimum annual residential reurbanization target of 20 percent.

Policy 5.6.3 of the Official Plan states: *“The Township will phase and achieve the reurbanization target of this Plan by:*

- c) Encouraging reurbanization generally throughout the delineated built-up area, except where infrastructure is inadequate and/or there are significant physical constraints and/or there are significant compatibility issues...”*

Response: The Site is located within the St. Jacobs Township Urban Area and will utilize existing municipal water services and sanitation services, and other applicable utilities, which have sufficient capacity to accommodate the Proposed Development.

Policy 5.6.4 of the Official Plan states: *“The Township will not approve any development applications to reduce the net residential density in areas planned for medium or high-density housing, if the reduction in density will significantly impact the ability to achieve the reurbanization target in Section 5.6.1, and the density target for the designated greenfield areas in Section 5.7, of this Plan.”*

Response: The Proposed Development will replace two existing single-detached dwellings to construct 29 townhouse dwellings, at a density of approximately 29.25 units per hectare, which will contribute to the Region and Township’s reurbanization target of 45% and 20%, respectively.

4.4.2 Settlement Patterns

Chapter 7 of the Official Plan relates to settlement patterns. As mentioned previously, the Site is located within the St. Jacobs Township Urban Area and is designated Residential and Ancillary Uses, which, as per **Policy 7.4.1.2**, is intended to indicate areas within which consideration may be given to the provision of living accommodations of all kinds, including townhouses, and uses ancillary to a residential area.

Section 7.5 of the Official Plan relates to settlement housing policies. As per **Policy 7.5.1.2** of the Official Plan, the Proposed Development is classified as a Medium Density Residential Use, and states: “*Medium Density Residential Uses*:

- a) *Medium density residential uses include all forms of dwellings containing three or more dwelling units such as [...] street and block townhouses. Medium density residential uses shall generally be equal or less than three storeys, or 12 metres in height, whichever is less, and having a density between 20 and 50 units per gross residential hectare. Small lot single and semi-detached dwelling units that fall within the density range are included.*
- b) *New medium density residential uses may be permitted subject to the following conditions:*
 - i. *The proposed development is compatible and can be sensitively integrated with the surrounding land uses. Special measures, such as increased building setbacks, or landscaped buffer strips may be required in order to ensure sensitive integration;*
 - ii. *The site is adequate in size and configuration to accommodate onsite facilities and amenities;*
 - iii. *The transportation, utilities and service infrastructure can adequately serve the proposed development;*
 - iv. *The community and neighbourhood amenities such as parks, open space, recreational facilities, and institutional services, can adequately serve the proposed development; and*
 - v. *The proposed garages for medium density residential uses shall 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.*
 - vi. *Townhouses shall not be adjoined into groupings of more than 8 units to a row.”*

Response: The Proposed Development:

- a) Contains five townhouse blocks, with each being two-storeys in height. The Proposed Development has a density of approximately 29.25 units per hectare, which falls within the density range for medium density residential uses;
- b)
 - i. The Proposed Development is compatible with the surrounding uses and can be sensitively integrated with the surrounding land uses. As the Proposed Development is limited to two-storeys in height, it is similar in scale and massing with adjacent residential uses. Similarly, there are adequate setbacks that generally exceed the Zoning By-law's requirements between the Proposed Development's townhouse blocks and adjacent dwellings, providing adequate buffering between these uses.
 - ii. The Site is of adequate size and configuration to accommodate the Proposed Development, with the layout being efficient while simultaneously providing generous setbacks between the townhouse blocks and adjacent uses;
 - iii. The Proposed Development will be fully serviced by municipal water services and sanitation services, as well as other applicable utilities, which are proximal to the Site and have sufficient capacity to accommodate the Proposed Development;
 - iv. The Proposed Development includes private amenity area for each of the units, in addition to the various parks, open space, recreational facilities, and institutional uses in the Village of St. Jacobs, identified in **Section 2.2** and **Figure 2** of this Report.
 - v. Each respective townhouse of the Proposed Development will contain an adequate amount of parking, including a driveway and a garage for each respective unit. As such, the Proposed Development adheres to the minimum parking requirements outlined in the Township of Woolwich Zoning By-law 26-2024 and on-Site parking is sufficient to accommodate the Proposed Development.
 - vi. The Proposed Development features groupings of 6, 6, 7, 6, and 4 units, respectively.

Section 7.28 of the Official Plan outlines the settlement plan for the St. Jacobs Township Urban Area. **Section 7.28.5** of the Official Plan outlines the residential land use policies.

Policy 7.28.5.2 of the Official Plan outlines the general residential policies, and states:
“General Residential Policies

- a) The St. Jacobs Settlement Area shall have a planned future population of approximately 2,675 people within the planning period to 2031. Minor adjustments will not require an amendment to this Settlement Plan provided the general intent of the plan is maintained.*
- c) The net residential density on a particular site may be permitted to a maximum of 120 units per net residential hectares (48.6 units per net residential acre) provided sufficient services are available, the development is compatible with proposed or existing surrounding land uses and is consistent with the objectives and policies of this Plan. Higher density development may be considered by site-specific amendment to the Township Official Plan.*
- d) A range and variety of dwelling unit types and densities shall be required to accommodate the various household structures and income groups expected in the St. Jacobs Settlement Area.*
- e) Residential development shall not be permitted without full municipal sanitary sewer, water, storm sewer and electrical services...”*

Response: The Proposed Development:

- a) Will contribute 29 townhouse dwellings, housing approximately 70 residents upon the completion of construction and occupancy, which will contribute to the Township’s goal of 2,675 residents in the St. Jacobs Settlement Area by 2031.
 - c) The Proposed Development has a density of approximately 29.25 units per hectare and will be serviced by municipal water services and sanitation services, as well as all other applicable utilities, which have sufficient capacity to accommodate the Proposed Development.
 - d) The Proposed Development includes 29 townhouse dwellings, which will contribute to a range and variety of dwelling unit types and densities in the surrounding neighbourhood, as well as the broader context of the Village of St. Jacobs, Township of Woolwich, and Region of Waterloo.
 - g) The Proposed Development will be fully serviced by existing municipal water services and sanitation services, as well as all other applicable utilities, which have sufficient capacity to accommodate the Proposed Development.
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Section 7.28.12 of the Official Plan relates to services and utilities. **Policy 7.28.12.2** of the Official Plan relates to sanitary sewer policies and states: “*Sanitary Sewer Policies*

- a) *The St. Jacobs Settlement Area shall be serviced by existing and/or proposed sewage treatment plant facilities.*

Policy 7.28.12.3 of the Official Plan relates to water supply policies and states: “*Water Supply Policies*

- a) *Water supply shall be made available from the expansion of the existing water distribution system.”*

Response: The Proposed Development will be serviced by existing municipal water services and sanitation services, which are proximal to the Site and as confirmed through the Functional Servicing Report prepared by Meritech have sufficient capacity to accommodate the Proposed Development.

4.4.3 Housing Policies

Chapter 9 of the Official Plan relates to housing. **Section 9.2** of the Official Plan outlines the policies for a range and mix of housing options. **Policy 9.2.1** of the Official Plan states: “*The Township will provide for a diverse range and mix of housing options, including additional/accessory residential units as noted in e) ii) below and affordable housing, to serve all sizes, incomes, and age of households in the community by.*

- e) *Encouraging housing intensification in appropriate areas, including, but not limited to:*
 - i. *Providing opportunities for reurbanization within the delineated built-up area, except where infrastructure is inadequate or there are significant physical constraints...”*

Response: The Proposed Development will intensify the Site, consisting of 29 townhouse dwellings. Currently, two single-detached dwellings exist on the Site, which are proposed to be demolished to accommodate the Proposed Development. The Proposed Development will be fully serviced by existing municipal water services and sanitation services, as well as all other applicable utilities, which have sufficient capacity to accommodate the Proposed Development.

Overall, the Proposed Development will contribute 29 townhouse dwellings at a density of approximately 29.25 units per hectare, contributing to reurbanization and population targets

for the Township of Woolwich and Region of Waterloo. The development will accommodate approximately 70 residents and will be full serviced by existing municipal water services and sanitation services, which have sufficient capacity to accommodate the Proposed Development. The Proposed Development respects the scale, massing, and character of the surrounding neighbourhood while simultaneously intensifying the Site and supporting a range and mix of housing options.

As such, the Proposed Development is consistent with the policies outlined in the Township of Woolwich Official Plan.

4.5 Township of Woolwich Zoning By-law 26-2024

The Township of Woolwich Zoning By-law 26-2024 (“Zoning By-law”), approved in 2024, replaces the existing Township of Woolwich Zoning By-law 55-86, and states how land may be used, where buildings and other structures can be located, the type of buildings that are permitted and how they may be used, the minimum or maximum lot sizes, parking requirements, building heights and setbacks from the street, and other building and land use controls as deemed appropriate.

The Township of Woolwich Zoning By-law 26-2024 identifies and zones the Site as Residential (“R-1”), which is described as a low-density zone with a limited range of housing types for areas on private services (see **Figure 10**).

To facilitate the Proposed Development, a Zoning By-law Amendment is required to rezone the Site from Residential (“R-1”) to Residential (“R-6”). The Residential (“R-6”) Zone permits a wide variety of dwelling types, including townhouses. A zoning compliance table has been provided below, which outlines how the requirements of the Residential (“R-6”) Zone and proposed site-specific exemptions required to facilitate the Proposed Development:

Table 1. Zoning Compliance Table

Zone Provision	Required Per Residential (“R-6”) Zone Requirements	Provided (R6-XX)	Complies (Y/N)
Permitted Uses	Townhouse Row Not Permitted	Townhouse Row	Y
Min. Lot Area	150.0 square metres	174.64 square metres	Y
Min. Lot Width (Interior)	N/A	5.8 metres	Y
Min. Lot Width (Exterior)	N/A	8.70 metres	Y



Source: Township of Woolwich Zoning By-Law, Map 16 (2024)

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Min. Building Line Setback – Front Wall (attached 1 car garage or portion thereof on a lot less than 11.0 metres wide)	3.5 metres	6.0 metres	Y
Min. Building Line Setback – Flankage	3.5 metres	6.5 metres	Y
Min. Side Yard Setback – Townhouse Shared	Zero along the common wall between two units.	0.0 metres	Y
Min. Side Yard Setback – Townhouse Interior Lot Line	1.5 metres	1.5 metres	Y
Min. Rear Yard Setback	7.0 metres	8.1 metres	Y
Min. Ground Floor Area	50 square metres	91.83 square metres	Y
Max. Main Building Height	12.5 metres	2-storeys, under 12.5 metres	Y
Max. Lot Coverage	60%	53 %	Y
Max. Net Density	120 units / hectare (R6 Zone) 50 units / hectare (R4 & R5 Zone)	29.24 units / hectare	Y
Min. Outdoor Amenity Area	30 square metres	Varies, smallest 47 square metres per dwelling unit + 264 square metre common amenity area	Y
Min. Landscaped Area – Front Yard	Minimum width of landscaped area shall be no less than 30% of the lot width	Varies, 48.28% of lot width	Y

Min. Landscaped Area – Front Yard	No less than 30% of the entire area of the front yard	48.28% of entire front yard (landscaped area)	Y
Parking Space Dimension (Perpendicular Parking)	2.75 metres x 5.50 metres	3.0 metres x 6.0 metres	Y
Min. Required Parking Spaces	1 space per dwelling unit (29 required)	1 space per dwelling unit	Y
Max. Driveway Width	3.66 metres	3.0 metres	Y
Max. Impervious Coverage	80%	Varies, maximum 63.38%	Y

The Proposed Development has been assessed against applicable zoning. While the Residential (“R-6”) Zone is considered a high-density zone, the Proposed Development is consistent with the density requirements for the Residential (“R-4”) Zone, Residential (“R-5”) Zone, and Residential (“R-6”) Zone, as well as all other applicable Residential (“R-6”) Zone requirements. The proposed Zoning By-law Amendment implements the direction of provincial and local legislation. A draft of the Zoning By-law Amendment is included in this report as **Appendix “A.”**

5. Supporting Studies

In support of the Subject Applications a Functional Servicing Report, Urban Design Brief, Preliminary Environmental Impact Study, Traffic Impact Study, Noise and Vibration Study, Arborist Assessment and Archaeological Impact Assessment have been completed. These documents have been reviewed in the completion of this Planning Justification Report and the findings of these reports and the opinions provided therein have been relied on to inform the opinions provided in this Planning Justification Report.

6. Planning Applications

Concurrent applications for Zoning By-law Amendment and Draft Plan of Subdivision are submitted to permit the Proposed Development.

6.1 Zoning By-law Amendment Application

A Zoning By-law Amendment application has been submitted to rezone the Site from Residential (“R-1”) to Residential (“R-6”) Zone.

6.2 Draft Plan of Subdivision Application

As part of the Subject Application, a Draft Plan of Subdivision application has been submitted to establish the lotting for the street fronting townhouse blocks on the northwest side of the Site fronting Printery Road and to create a block for the future development of the condominium townhouse dwellings along with a block for the woodlot buffer area.

6.3 Future Applications

Following the Zoning By-law Amendment and Draft Plan of Subdivision, a Site Plan Application will be submitted to the Township of Woolwich, whereby the Proposed Development will be refined with respect to design, functionality, and servicing.

As highlighted previously, a future Plan of Condominium application will be required to establish the lotting and permit the construction of the 18 condominium townhouse dwellings.

7. Public Consultation Considerations

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

The Proposed Zoning By-law Amendment requires a Statutory Public Meeting in accordance with the Planning Act. GSP Group will attend the public meeting as scheduled by the Township and give a formal presentation regarding the Proposed Development and associated applications, as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow-up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation process to Township and Regional staff for their review and consideration prior to the preparation of a final staff report and recommendation on the Zoning By-law Amendment and Draft Plan of Subdivision.

8. Summary & Conclusions

As outlined in this Report, the Proposed Development, Zoning By-law Amendment, and Draft Plan of Subdivision represents appropriate residential intensification. The Proposed Development includes 29 townhouse dwellings, accommodating approximately 70 residents at a density of 29.25 units per hectare. The Proposed Development and Subject Applications align with the Township of Woolwich Official Plan and Region of Waterloo Regional Official Plan, and their respective targets for reurbanization, intensification, and population growth, utilizing existing municipal infrastructure and utilities.

The Proposed Development represents the scale and character of the surrounding neighbourhood, introducing a compact development, with private amenity space and natural buffer areas along with a pedestrian-oriented design which contributes to the walkability of the Site internally, as well as connections to the larger community.

Overall, the Proposed Development is consistent with the policies outlined in the Planning Act, Provincial Planning Statement (2024), and conforms to the Region of Waterloo Official Plan, and Township of Woolwich Official Plan. The Proposed Development represents residential intensification on lands suitable to support such development, is an appropriate use, and represents good planning.

APPENDIX A

THE CORPORATION OF THE TOWNSHIP OF WOOLWICH

BY-LAW NO. 2025 _____ - _____

A BY-LAW TO AMEND ZONING BY-LAW 55-86 BEING A ZONING BY-LAW CONTROLLING
DEVELOPMENT WITHIN THE TOWNSHIP OF WOOLWICH

WHEREAS the Council of the Corporation of the Township of Woolwich (the "Township") deems it desirable to amend By-law 55-86, and amending by-laws, with respect to the lands identified on the attached Schedule "A" in accordance with the provisions of this by-law.

THEREFORE, THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF WOOLWICH
ENACTS AS FOLLOWS:

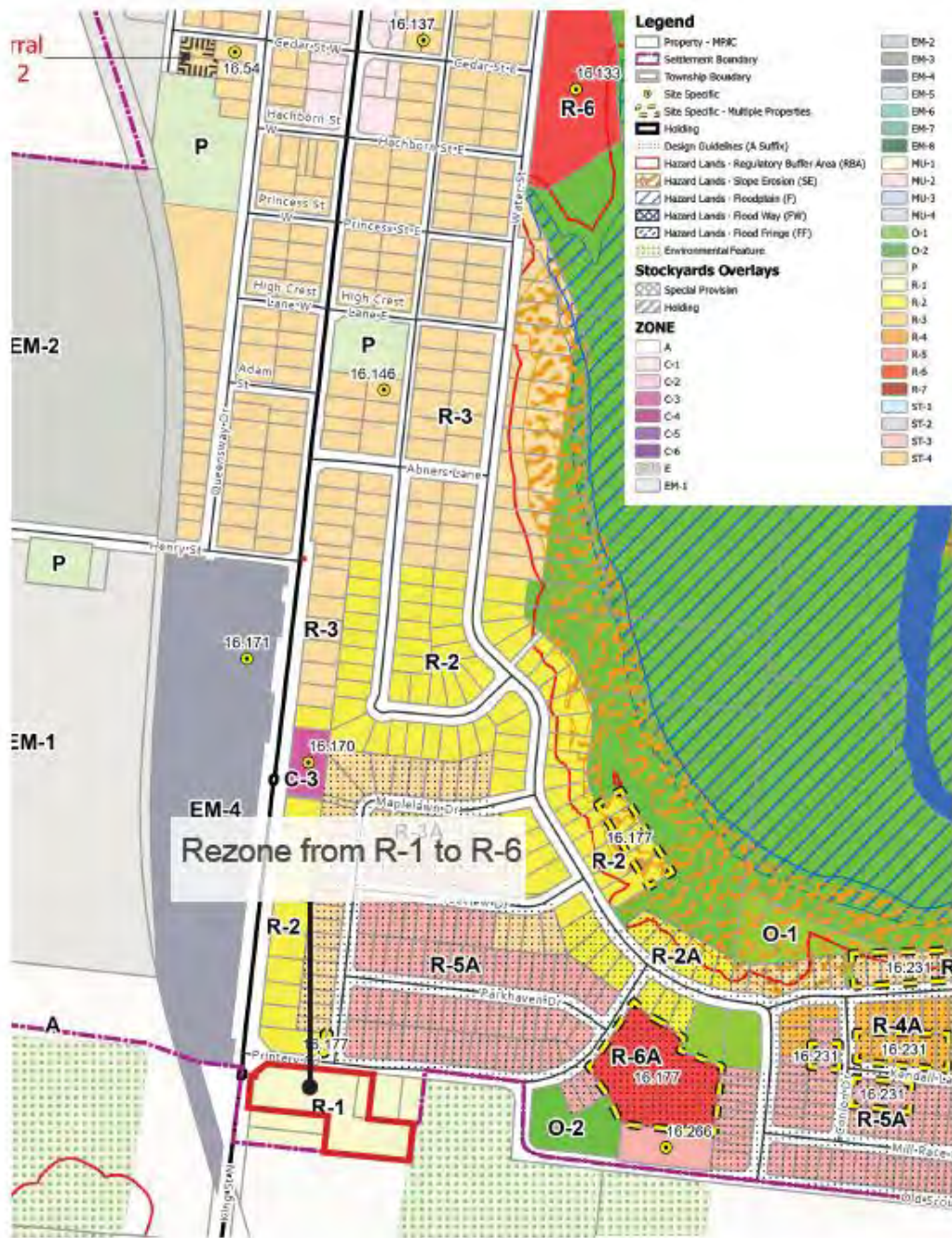
Township of Woolwich Zoning By-law Schedule "B" Map 16 – St. Jacobs is hereby amended by changing the zoning on the Subject Property from Residential (R1) Zone to Residential (R6) Zone as shown on Schedule A hereto.

ENACTED this _____ day of _____, 2025

MAYOR

CLERK

SCHEDULE A



Proposed Zoning By-Law Amendment
Township of Woolwich Zoning Map B-16