

Planning Justification Report

Fergus Golf Course Redevelopment

Fergus Land Holdings Inc. c/o Fergus Development Inc.

Township of Centre Wellington

County of Wellington

Zoning By-law Amendment

Revision to Draft Plan of Subdivision

July 2026



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Prepared for:

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1. Introduction

1.1 Background & Context

GSP Group is the planning consultant to Fergus Land Holdings Inc. (c/o Fergus Development Inc.), managed by Geranium Corporation (the “Applicant”). The Applicant is proposing to update existing residential development permissions for the redevelopment of a portion of the former Fergus Golf Club property (“Site”). The Site is bisected by Wellington Road 19 and is located west of 3rd Line in the Township of Centre Wellington, County of Wellington (**Figure 1**). The Site is owned and managed by Fergus Development Inc. and the Site consists of two properties:

- (1) **NW Lands** – The lands north-west of Wellington Road 19 contain an 18-hole golf course and associated facilities (“NW Lands” or “NW Site”). The 18-hole course on the NW Lands is temporarily closed pending planned improvements to the course and clubhouse.
- (2) **SE Lands** – The lands south-east of Wellington Road 19 contains a former 9-hole golf course (“SE Lands” or “SE Site”). The 9-hole course on the SE Lands is permanently closed as the planned residential development will occur on these lands.

The Site was subject to 2023 approvals of a Zoning By-law Amendment (By-law 2023-55), Draft Plan of Subdivision (23T-22001), and Draft Plan of Condominium (23CD-22001). 2023 Provincial approval(s) associated with County of Wellington Official Plan Amendment 119 also contained updated policies for the Site (refer to Section 1.2 of this Report for additional details on the Provincial approvals). Together, the 2023 approvals enabled additional residential development on the SE Lands while maintaining the NW Lands as an 18-hole golf course with new communal water and wastewater facilities. Section 1.2 of this Report contains additional background on the previous approvals.

Since the 2023 approvals and as further explained in Section 1.3 of this Report, the Applicant has revisited the 2023 approvals and is now proposing a 446-unit plan of subdivision on the SE Lands, with the NW Lands continuing to contain the water and wastewater facilities which are now proposed to be publicly owned, and a redeveloped 18-hole golf course (the “Proposed Redevelopment”). The residential lots and roads associated with Proposed Redevelopment of the SE Lands would be within plan of subdivision. A plan of condominium is no longer required; the previous common element draft plan of condominium would be allowed to lapse or would be rescinded. To facilitate the Proposed

Redevelopment, a Zoning By-law Amendment Application, and a Revision to Draft of Subdivision 23T-22001 are required (together, the “Subject Applications”).



1.2 Previous Approvals (1996 & 2023)

Permissions for residential permissions on the SE Lands were originally established in 1996 via approval from the Ministry of Municipal Affairs and Housing. The 1996 approvals permitted 41 residential units in a condominium on the SE Lands; these approvals did not ultimately proceed to development. In 2023, the Applicant obtained updated planning permissions which enabled a 118-unit residential common element plan of condominium on the SE Lands while maintaining the NW Lands as an 18-hole golf course with new communal water and wastewater facilities (“2023 Approvals”).

Key dates associated with the previous approvals are provided below:

- **February to June 1996** – Ministry of Municipal Affairs and Housing approves original residential permissions on the 9-hole golf course on the SE Lands. Official Plan and Zoning By-law provisions allowing the development came into effect in February of 1996 and the associated draft plan of condominium was approved in June of 1996.
- **April 11, 2023** – The Province [approved](#) County of Wellington Official Plan Amendment 119, which included updated policies and mapping permissions for the Site.
- **July 17, 2023** – The Township of Centre Wellington approved a Zoning By-law Amendment (By-law 2023-55) for the Site to further facilitate approvals on the Site.
- **October 5, 2023** – The County of Wellington approved the associated Plan of Subdivision (23T-22001) and Plan of Condominium (23CD-22001) associated with approvals of the Site.
- **December 6, 2023** – The [Official Plan Adjustments Act, 2023](#) came into effect via Royal Assent of Bill 150 (*Planning Statute Law Amendment Act, 2023*), which reversed the Province’s April 11, 2023, approval of County of Wellington Official Plan Amendment 119.
- **May 16, 2024** – [Bill 162 \(Get it Done Act, 2024\)](#), received Royal Assent which largely undid the Bill 150 reversal and reinstated most policies of the Province’s original April 11, 2022, approval of County of Wellington Official Plan Amendment 119, including for the Site.

1.3 Proposed Redevelopment

Since the 2023 Approvals, market conditions and community priorities have evolved and the Applicant has re-evaluated the approvals, resulting in the resubmission of the Subject Applications covered in this Report. As a result of these changes, the Applicant is changing the tenure of the Proposed Redevelopment to be freehold and within a draft plan of subdivision; a plan of condominium is no longer proposed, and the previous draft plan of condominium would be allowed to lapse or would be rescinded as noted above. Condition 48 of the previous Draft Plan of Condominium approval (23CD-22001) states that the lapsing date is October 6, 2026.

The Applicant is maintaining key elements of the original approvals such as general subdivision layout and road configuration while adjusting approaches to lotting and servicing. The following key changes are proposed to the 2023 Approvals:

- **The Proposed Redevelopment is now proposed as only a plan of subdivision rather than a combination of plan of subdivision and plan of condominium.** Upon registration and final approvals, all roads and associated infrastructure will be publicly owned by the Township of Centre Wellington. The residential lots within the 2023 Approvals were proposed within a privately-owned common element plan of condominium within a broader plan of subdivision; a common elements plan of condominium is no longer proposed.
- **The Proposed Redevelopment is proposed to be serviced by publicly-owned facilities including a water and wastewater treatment plant along with drinking water wells,** whereas the 2023 Approvals included a communal water and wastewater treatment plant and private drinking water wells which were to be managed by a private condominium corporation.
- To respond to market conditions and the opportunity for public servicing, **446 residential lots are now proposed.**
- To further support the change to a plan of subdivision, **road right-of-way widths have been increased to 18 and 20 metres and one parkette (0.13 hectares) and one large park (1.74 hectares) is provided.**

Section 3 of this Report provides a more detailed summary of the Proposed Redevelopment.

1.4 Report Content and Structure

This Planning Justification Report (“Report”) has been prepared in support of the Subject Applications and provides planning justification for the proposed Zoning By-law Amendment and Revision to Draft of Subdivision 23T-22001. 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 planning justification for the Subject Applications.

2. Subject Property & Context

2.1 Site Description

The Site is located on the west side of 3rd Line and on the north and south sides of Wellington Road 19 in the Township of Centre Wellington in the County of Wellington. The Site has a total area of approximately 82.2 hectares, with the NW Lands totaling approximately 42.35 hectares, and the SE Lands totaling approximately 39.85 hectares. A more detailed description of the NW Lands and SE Lands is provided below:

- **NW Lands** – The NW Lands contain an 18-hole golf course, Belwood Golf Club (formerly Fergus Golf Club), which is temporarily closed due to initial site works associated with the 2023 Approvals, including the demolition and reconstruction of a new clubhouse and parking facilities. The 18-hole golf course is proposed to be refurbished and reopened, subject to the final construction of the applicable facilities required for its operation (clubhouse, parking facilities, maintenance buildings, etc.).
- **SE Lands** – The SE Lands were previously used as a 9-hole golf course, which has permanently closed. The SE Lands are currently vacant and have undergone site works in anticipation of residential redevelopment associated with the 2023 Approvals. The SE Lands features pockets of wetlands with the remainder of the SE Lands being a mix of treed areas and grassed open space.

A pedestrian underpass formerly used as a golf cart path runs beneath Wellington Road 19 and links the NW Lands and the SE Lands. The underpass will be retained through the Proposed Redevelopment as a linkage between the subdivision and the golf course and utilization by golf carts will be prohibited.

2.2 Surrounding Uses

The Site is located west of Belwood Lake, which is owned by the Grand River Conservation Authority. Belwood Lake is generally lined with cottage-style housing on leased land, commonly featuring individual, private docks or boat launches on private servicing. On the east side of 3rd Line, there is an existing small, low density estate residential neighbourhood located on Rennie Boulevard, as well as 3rd Line Road Private and First Street Private, which provide access to water-front cottages on Belwood Lake (**Figure 2**).

The Site is generally surrounded by agricultural uses to the west, and south. To the east are existing residential uses as noted above. A mix of recreation and agricultural uses are located to the north. Recreational uses such as the YMCA Camp Belwood and Belwood Lake Conservation Area are located further to the southeast. Additional recreational uses, including the Elora Cataract Trailway, are located to the south of the SE Lands. The Belwood Hamlet is an approximately 5-minute drive north-east from the Site and includes a restaurant, small convenience/grocery store, community centre (Belwood Hall) and small tourist shop(s) and attractions with surrounding pockets of residential neighbourhoods.

2.3 Transportation Context

The Site is adjacent to both 3rd Line and Wellington Road 19. 3rd Line features one travel lane in each direction. Wellington Road 19 also features one travel lane in each direction and is designated as a County Road in the County of Wellington Official Plan. As noted in Section 2.2, the Elora Cataract Trailway runs adjacent the Site to the south, providing an expansive recreational trail system linking Elora in the west to Forks of the Credit Provincial Park in the east, travelling through Fergus, Belwood, Hillsburgh, and Erin.



3. Proposed Redevelopment

3.1 Revised Draft Plan of Subdivision

The Proposed Redevelopment includes 446 lots intended for single detached dwellings on the SE Lands which will be integrated with the existing 18-hole golf course and clubhouse on the NW Lands to form an overall recreation-based golf and residential community. Plan of Subdivision 23T-22001 currently applies to the Site (from the 2023 Approvals); a Revision to 23T-22001 is proposed to facilitate the Proposed Redevelopment. The Revision will introduce more detailed blocks and lotting to Draft Plan 23T-22001 to facilitate the future plan of subdivision, as a plan of condominium is no longer proposed. There are three distinct areas shown on the Revision to Draft Plan of Subdivision 23T-22001:

- **SE Lands** – This area includes 446 residential lots with public roads, open space and central wetland, stormwater block, pumping station, one municipal parkette, one municipal park and other associated facilities. The SE Lands are approximately 39.7 hectares in area. The 446 lots range in size, with the majority (183) being 38-foot lots (11.6 metres), 128 being 32-foot lots (9.8 metres), 116 being 45-foot lots (13.7 metres), and 19 being 52-foot lots (15.8 metres). The lot depths range from 37.5 metres to 85.8 metres, with the majority being around 50 metres in depth. A 6-metre landscape buffer is proposed along a portion of Wellington Road 19. The SE Lands also contain a pump station along the southern edge of the SE Lands (Block 452).
- **NW Lands, Servicing Block** (Block 255) – This area includes a servicing block located on the NW Lands that will contain water and wastewater facilities to service the Proposed Redevelopment. The intent is that this block and the associated infrastructure will be publicly owned and operated.
- **NW Lands, Golf Course** (Block 206) – This area includes the existing 18-hole golf course and associated facilities, which is proposed to be refurbished and will include a clubhouse, parking facilities, and a new maintenance building. The golf course lands are proposed to contain the proposed publicly owned water and wastewater treatment facilities, together with three to four municipal drinking water wells, which will service the Proposed Redevelopment.

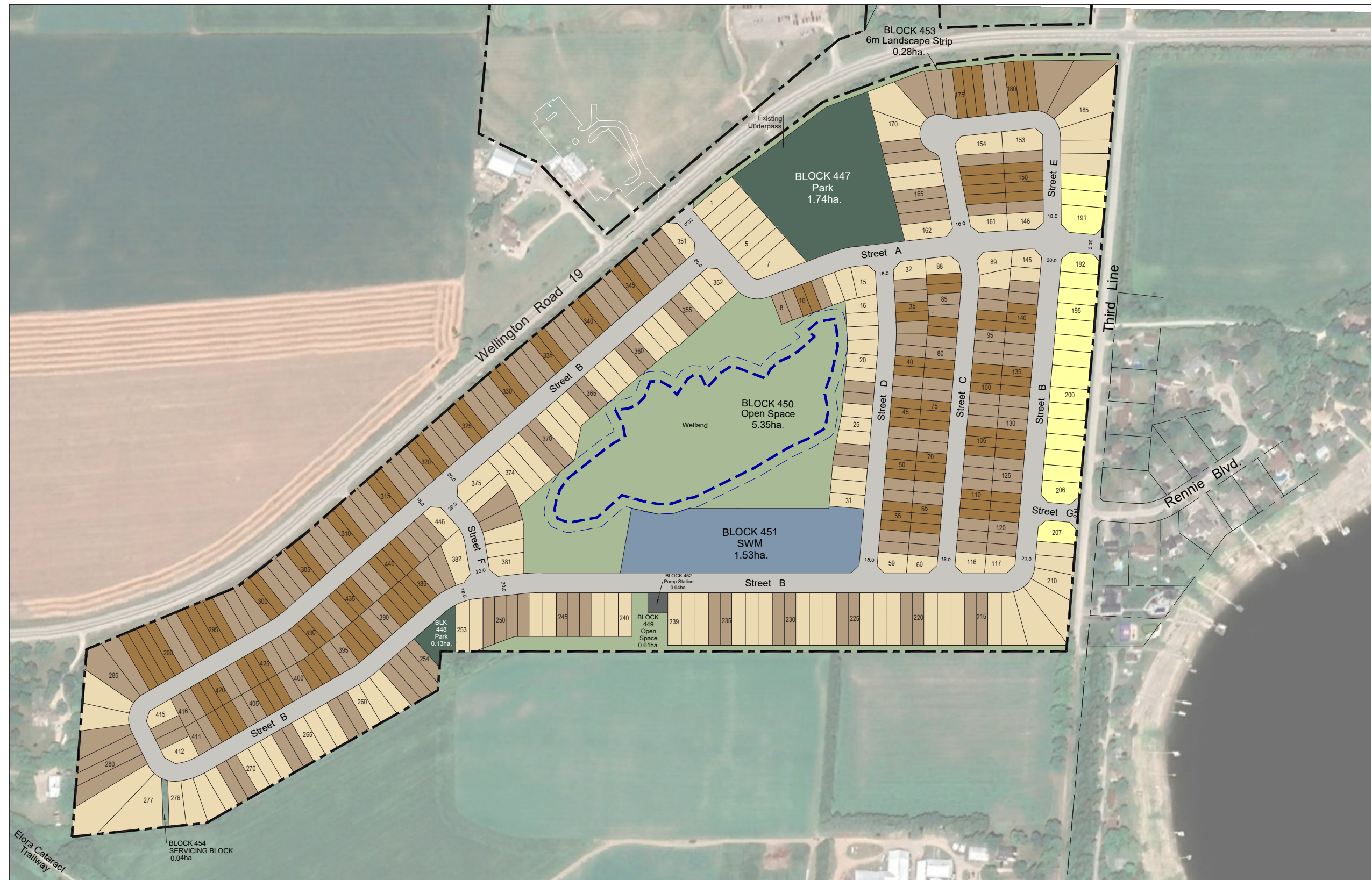
The Proposed Redevelopment is shown on **Figure 3** and the Revision to Draft Plan of Subdivision 23T-22001 is shown on **Figure 4**.

3.2 Roads, Trails, SWM and Open Space

The proposed collector streets within the Proposed Redevelopment, such as Streets A, B, and F have 20 metre right-of-way widths, whereas local streets, such as Streets B (west of Street F), D, C, and E have right-of-way widths of 18 metres, which align with the Township of Centre Wellington's standards for minor local streets and minor collector streets, respectively, as noted in the Township's Development Manual (2024). The central wetland area on the SE Lands – including a 10-metre buffer around the feature – will be maintained (Block 450). A 1.30-hectare stormwater management pond is located south of the central wetland block (Block 451). A sanitary pumping station is located south of the stormwater pond (Block 452). A stormwater management pond is located within Block 255, adjacent to Wellington Road 19. The existing underpass connection between the NW Lands and SE Lands will be maintained and will connect to the park block (Block 447) of the Proposed Redevelopment. A pedestrian network is proposed in the subdivision via sidewalks on the public streets and a planned future connection to the Elora Cataract Trailway.

3.3 Parkette and Park Blocks

Through the 2023 Approval, parkland dedication was planned to be provided as cash-in-lieu in accordance with the *Planning Act*. Through the Proposed Redevelopment, one 0.13-hectare parkette (Block 448) along with one 1.74-hectare park block (Block 447) is proposed. In total, 1.87 hectares of park area is proposed. The parkette and park blocks are located on the southwest and northeast of the Proposed Redevelopment, respectively and meet the parkland dedication requirement of 1.77-hectares.



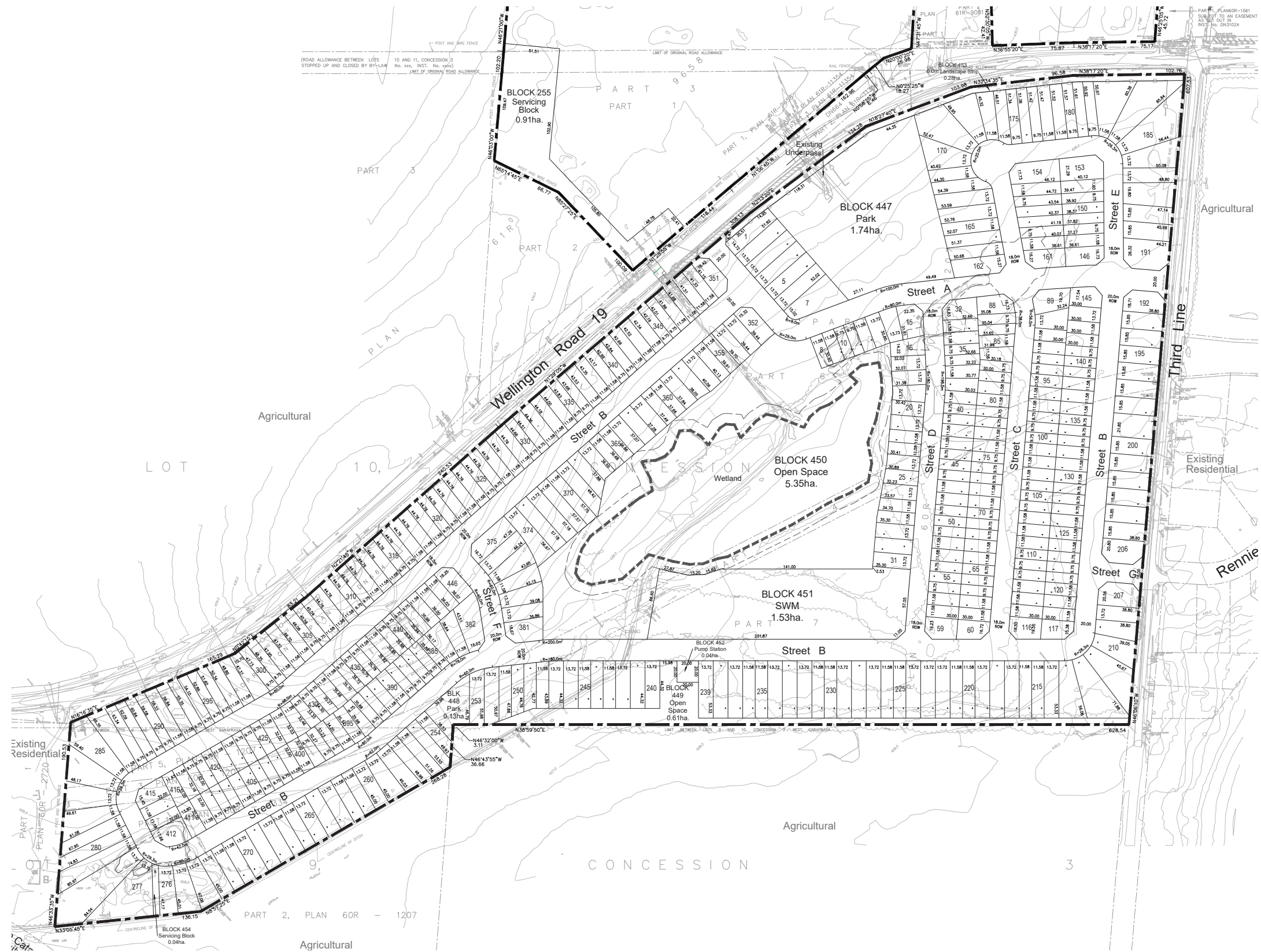
Site Area: 39.7ha.
Lots: 446

- 52' - 19 Lots
- 45' - 116 Lots
- 38' - 183 Lots
- 32' - 128 Lots

Drainage Easement

Proposed Redevelopment
Source: GSP Group Inc. (2026)

Figure
3



4. Policy Overview and Analysis

This section provides an overview of the applicable Provincial, County, and local land use planning policy framework that applies to the Site and provides a policy analysis for how the Proposed Redevelopment and its Subject Applications align with these policies. Regulatory and policy documents included in this section are the Planning Act, Provincial Planning Statement, County of Wellington Official Plan, and Township of Centre Wellington Zoning By-law No. 2009-045.

4.1 Planning Act

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

4.1.1 Matters of Provincial Interest

Section 2 of the *Planning Act* provides that when municipal councils, planning boards, the Tribunal, and the Minister carry out their responsibility under the *Planning Act*, they shall have regard for matters of provincial interest. The provincial interests applicable to the Proposed Redevelopment and requested planning applications are assessed in **Table 1**:

Table 1 – Planning Act – Assessment of Matters of Provincial Interest		
Section 2 Matters of Provincial Interest		
#	Criteria	Assessment
(a)	<i>the protection of ecological systems, including natural areas, features and functions;</i>	An Environmental Impact Study Addendum was prepared in support of the Proposed Redevelopment and is summarized in Section 5.9 of this Report and concludes that impacts on natural heritage and hydrologic features can be avoided, minimized, or offset by implementing the recommendations outlined in the EIS.
(b)	<i>the protection of the agricultural resources of the Province;</i>	The Site has historically been designated for residential and recreational purposes and not

		for agricultural uses. With respect to any impacts to surrounding agricultural uses, a Minimum Distance Separation Report was completed as part of the 2023 Approvals, and a response letter was completed for the Proposed Redevelopment, dated July 2026, which are summarized in Section 5.13 of this Report. confirms that MDS I setbacks do not need to be calculated for the Proposed Redevelopment as it does not permit a more sensitive land use than existed before.
(d)	<i>the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;</i>	A Stage 1 Archaeological Assessment was prepared as part of the 2023 Approvals for the entire Site and a Stage 2 Archaeological Assessment was completed for the SE Lands, and a Stage 2 Archaeological Assessment was completed for a portion of the NW Site attributed to the proposed water and wastewater treatment facilities. The archaeological assessment work completed to-date is summarized in Section 5.3 of this Report.
(e)	<i>the supply, efficient use and conservation of energy and water;</i>	A Water Balance Addendum, Hydrogeological Investigation and Water Supply, Functional Servicing Report, and Water and Wastewater Servicing Study have been completed in support of the Subject Applications and are summarized in Sections 5.2, 5.6, 5.7, and 5.12 of this Report, respectively. These studies conclude that the Proposed Redevelopment can be serviced and that no adverse impacts to adjacent water users are expected.
(f)	<i>the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;</i>	Technical studies related to transportation and sewage and water services are summarized in Sections 5.7 and 5.10 of this Report, respectively. It is anticipated that these matters along with other items (i.e. telecommunications) will be further addressed through conditions of draft approval.
(h)	<i>the orderly development of safe and healthy communities;</i>	The Proposed Redevelopment makes efficient use of the Site and provides a logical site

		layout that will result in the orderly development of a safe and healthy community.
(h.1)	<i>the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;</i>	The Proposed Redevelopment will adhere to all requirements set out in the Accessibility for Ontarians with Disabilities Act, 2005, as well as any Ontario Building Code standards for accessible design.
(i)	<i>the adequate provision and distribution of educational, health, social, cultural and recreational facilities;</i>	The Proposed Redevelopment will utilize existing educational, health, social, cultural, and recreational facilities that are in proximity to the Site.
(j)	<i>the adequate provision of a full range of housing, including affordable housing;</i>	The Proposed Redevelopment introduces 446 single-detached dwelling lots which will contribute to the range of housing available in the Township of Centre Wellington. No affordable housing is provided.
(k)	<i>the adequate provision of employment opportunities;</i>	N/A
(l)	<i>the protection of the financial and economic well-being of the Province and its municipalities;</i>	A Fiscal Impact Study was completed in support of the Proposed Redevelopment and is summarized in Section 5.11 of this Report.
(p)	<i>the appropriate location of growth and development;</i>	The Site is located on land that is designated for residential and recreational purposes. As such, the Site represents a logical location for a recreational-based subdivision with proximity to surrounding recreational uses including to its associated recreational use, the golf course located on the NW Site.
(q)	<i>the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;</i>	There is no public transit service in the Township of Centre Wellington. The Proposed Redevelopment has been designed to be pedestrian-oriented, with the maintenance of an existing pedestrian underpass connection to the associated golf course on the NW Lands. The Proposed Redevelopment has been thoughtfully designed to be consistent with contemporary development and will incorporate any sustainability standards prescribed by the Ontario Building Code. An Urban Transportation Considerations Report is provided in Section 5.10 of this Report.

(r)	<i>the promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;</i>	The Proposed Redevelopment incorporates a well-designed built form and layout with a logical street network on the SE Lands, pedestrian sidewalks and lot sizes which are reflective of the intent to develop a publicly-serviced plan of subdivision. The Proposed Redevelopment has also been designed to complement the to be refurbished golf course on the NW Lands as recreation-based community, further contributing to the creation of a sense of place.
(s)	<i>the mitigation of greenhouse gas emissions and adaptation to a changing climate.</i>	The Proposed Redevelopment will incorporate any sustainability standards prescribed by the Ontario Building Code.

4.1.2 Draft Plan of Subdivision

Section 51(24) of the *Planning Act* sets out requirements for the subdivision of land. In consideration of draft plans of subdivision, regard shall be given to “*health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality.*” The applicable criteria are evaluated in Table 2:

Table 2 – Planning Act – Assessment of Subdivision Criteria		
Section 51(24) Draft Plan of Subdivision Requirements		
#	Criteria	Assessment
51(24)	<i>In considering a draft plan of subdivision, 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</i>	The health and safety of future inhabitants will be ensured through high quality design and building design that is AODA compliant. Roads will be sized per Township of Centre Wellington road standards and efficiently organized to accommodate maintenance and emergency vehicles.
(a)	<i>the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;</i>	The Proposed Redevelopment has regard to matters of provincial interest, as outlined in Table 1 above.
(b)	<i>whether the proposed subdivision is premature or in the public interest;</i>	The Site has existing approvals from 2023, indicating that the redevelopment of the lands is not premature. The Proposed Redevelopment assists with the provision of a full range of housing in Centre

		Wellington and the County and is in the public interest.
(c)	<i>whether the plan conforms to the official plan and adjacent plans of subdivision, if any;</i>	The majority of the Site is designated Recreational, including site specific residential and recreational use in the County of Wellington Official Plan. As further justified in Section 4.3 of this Report, an Official Plan Amendment is not required as part of the Subject Applications.
(d)	<i>the suitability of the land for the purposes for which it is to be subdivided;</i>	As noted above, the majority of the Site is designated Recreational, including site specific residential and recreational use in the County of Wellington Official Plan. Vehicular access can be provided through new local municipal roads that connect to the existing public street network. Various technical studies are summarized in Section 5.0 of this Report and support the Proposed Redevelopment.
(d.1)	<i>if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;</i>	N/A
(e)	<i>the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;</i>	An Urban Transportation Considerations Report ("TIS") was prepared in support of the Subject Applications and is summarized in Section 5.11 of this Report. The TIS concluded that with the implementation of the recommended road improvements, the Proposed Redevelopment can be accommodated on the future transportation network.
(f)	<i>the dimensions and shapes of the proposed lots;</i>	The proposed lots are generally rectangular in shape and sufficiently sized for residential use – refer to the support technical studies in Section 5.0 of this Report for additional details.
(g)	<i>the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;</i>	To be further reviewed and confirmed through agency review of the Subject Applications.

(h)	<i>conservation of natural resources and flood control;</i>	An Environmental Impact Study Addendum was prepared in support of the Subject Applications and is summarized in Section 5.9 of this Report.
(i)	<i>the adequacy of utilities and municipal services;</i>	A Functional Servicing Report and Water Supply and Wastewater Servicing Study were prepared in support of the Subject Applications and are summarized in Sections 5.7 and 5.12 of this Report, respectively. These reports concluded that the Proposed Redevelopment can be developed and serviced.
(j)	<i>the adequacy of school sites;</i>	Local school boards will be circulated as part of agency review of the Subject Applications.
(k)	<i>the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;</i>	The Proposed Redevelopment will convey areas such as the parkette, park, servicing blocks, and open space for public purposes. Refer to the Revised Draft Plan on Figure 4 for details on these lands.
(l)	<i>the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and</i>	The Proposed Redevelopment will incorporate any sustainability standards prescribed by the Ontario Building Code.
(m)	<i>the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act</i>	A future Site Plan Approval application will be made for the Site, should it be required.

4.1.3 Planning Act Summary

In summary, a range of technical studies – including but not limited to environmental, archaeological, servicing, transportation, geotechnical, hydrogeological, noise, and fiscal impact – support the Proposed Redevelopment and demonstrate that the Site can be developed in a safe, efficient, and responsible manner. The redevelopment makes logical use of lands already designated for residential and recreational purposes, integrates with the proposed renovated golf course and other surrounding recreational amenities. The Proposed Redevelopment contributes to the Township of Centre Wellington and County of Wellington housing supply through 446 lots intended for single-detached dwellings. The plan promotes accessibility, pedestrian connectivity, and a well-designed built form. Overall,

the Proposed Redevelopment represents orderly and context-appropriate development and has regard for matters of provincial interest under the *Planning Act* and conforms to the criteria for draft plans of subdivision.

4.2 Provincial Planning Statement (2024)

The Provincial Planning Statement (“PPS”) came into effect on October 20, 2024, and replaces the Provincial Policy Statement 2020 and 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 serves as a foundation for regulating development and use of land while supporting the provincial target of building 1.5 million homes by the year 2031. The PPS provides direction on several planning issues including increasing housing supply; making land available for development; planning for appropriate infrastructure; and protecting the natural environment.

4.2.1 Planning for People and Homes

Section 2.1 of the PPS outlines the policies for planning for people and homes. Policy 2.1.6 states, in part, *“Planning authorities should support the achievement of complete communities by: accommodating an appropriate range and mix of land uses, housing options [...] recreation, parks and open space, and other uses to meet long-term needs (a).”*

Response: The Proposed Redevelopment supports the achievement of complete communities by providing 446 residential lots intended for single-detached dwellings, as well as refurbishment to the existing golf course on the NW Lands to create a rural, recreation-based residential subdivision which provides recreation, parks, and open space to meet long-term needs. The Proposed Redevelopment is proximate to retail, service commercial, health care, and other services located in Fergus, Elora, and Belwood.

4.2.2 Housing

Section 2.2 of the PPS outlines the policies for housing. Policy 2.2.1 states, in part, *“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... permitting and facilitating... all housing options required to meet the social, health, economic and well-being requirements of current and future residents... and 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 Redevelopment provides 446 residential lots on the SE Lands which will contribute to the meeting of projected needs for current and future residents of the regional market area. By increasing existing residential permissions previously secured through the 2023 Approvals while continuing to address key technical matters summarized in Section 5.0 of this Report,

the Proposed Redevelopment is at a density that efficiently uses the land, resources, infrastructure and public service facilities available in the surrounding area and supports the use of active transportation within the Site (i.e. sidewalks and the pedestrian underpass between the SE Lands and the NW Lands).

4.2.3 Rural Areas in Municipalities

Section 2.5 of the PPS outlines the policies for rural areas in municipalities. Policy 2.5.1 states, in part, that “*healthy, integrated and viable rural areas should be supported by:*

- a) building upon rural character, and leveraging rural amenities and assets;*
- d) using rural infrastructure and public service facilities efficiently;*
- g) conserving biodiversity and considering the ecological benefits provided by nature; and*

Policy 2.5.2 states that “*in rural areas, rural settlement areas shall be the focus of growth and development and their viability and regeneration shall be promoted.*” Policy 2.5 further states that “*growth and development may be directed to rural lands in accordance with policy 2.6.*”

The response below focuses on Policy 2.5 (Rural Areas). The response in Section 4.2.4 of this Report provides a response to Policy 2.6 (Rural Lands).

Response: The Site is located outside a rural settlement area and is further classified as “rural lands” per the corresponding definition PPS, which states that rural lands are “*lands which are located outside settlement areas, and which are outside prime agricultural areas.*” While Policy 2.5.2 states that rural settlement areas shall be the focus of growth in rural areas, the Site has longstanding residential and recreational permissions (as outlined in Section 1.2 of this Report) which lends support to development on the Site. Further, the Proposed Redevelopment builds upon rural character and leverages rural amenities and assets by maintaining and upgrading an existing golf course and providing 446 residential lots to create a recreation-based golf-oriented community. The abutting golf course on the NW Lands, a rural recreation amenity and asset, is connected via an underpass through the proposed park, with the expectation that residents of the Proposed Redevelopment will be frequent patrons of the course including the clubhouse amenities (restaurant, pickleball courts, etc.). Future residents will

also be able to utilize other rural recreational amenities and assets in the immediate surrounding area (i.e. Belwood Lake Conservation Area, Elora Cataract Trailway). As noted, the Site has had permissions for residential uses since 1996 and has therefore been envisioned since that time as lands that would accommodate residential uses within the surrounding rural context. In addition, the Proposed Redevelopment is complementary to recreation-based housing in the immediate area along Belwood Lake, which are also located outside of a settlement area and on rural lands. The Proposed Redevelopment fulfils the planned function of the Site by having a “recreation” focus in relation to the golf course on the NW Lands and has a similar context to the residential lots in the surrounding area which are proximate to Belwood Lake and other recreational amenities within the broader rural/agricultural area.

For the reasons noted above, the Proposed Redevelopment maintains healthy, integrated, and viable rural areas and builds upon the existing rural character by leveraging rural amenities and assets and is consistent with Policy 2.5.1 a) of the PPS.

With respect to conserving biodiversity, an Environmental Site Assessment and Environmental Impact Study were prepared in support of the Subject Applications and are summarized in Sections 5.5 and 5.9 of this Report. Therefore, the Subject Applications are consistent with Policy 2.5.1 g) of the PPS.

4.2.4 Rural Lands in Municipalities

Section 2.6 of the PPS outlines the policies for rural lands in municipalities. Policy 2.6.1 states that *“on rural lands located in municipalities, permitted uses are:*

- b) resource-based recreational uses (including recreational dwellings not intended as permanent residences);*
- c) residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services;*

Policy 2.6.2 states that *“development that can be sustained by rural service levels should be promoted.”*

Policy 2.6.3 states that *“development shall be appropriate to the infrastructure which is planned or available, and avoid the need for uneconomical expansion of this infrastructure.”*

Policy 2.6.4 states that “*planning authorities should support a diversified rural economy by protecting agricultural and other resource-related uses and directly non-related development to areas where it will minimize constraints on these uses.*” Policy 2.6.5 further states that “*new land uses, including the creation of lots... shall comply with the minimum distance separation formulae.*”

Response: As noted, the Site is considered “rural lands” per the PPS definition. The Proposed Redevelopment generally maintains the intent of the 2023 Approvals by continuing to propose a recreational resource-based residential community (including a golf course); resource-based recreational uses within rural lands is consistent with Policy 2.6.1 b). With respect to lot creation, Policy 2.6.1 c) permits residential development and lot creation on rural lands, where site conditions are suitable for the provision of appropriate sewage and water services. As noted, the Proposed Redevelopment will be serviced by a servicing block located on the NW Lands that will contain water and wastewater facilities. The intent is that this block and the associated infrastructure will be publicly owned and operated. The technical studies submitted in support of the Subject Applications and summarized in Section 5.0 of this Report – such as the Functional Servicing Report, Water and Wastewater Servicing Study, and Fiscal Impact Study – demonstrate that site conditions are suitable for these services and that this infrastructure is appropriate and does not result in the uneconomical expansion of infrastructure. The Functional Servicing Report and Water and Wastewater Servicing Study, summarized in Section 5.7 and 5.12 of this Report, respectively, conclude that the Proposed Redevelopment can be developed and serviced. The Fiscal Impact Study concludes that the development of this servicing infrastructure is financially feasible. This is therefore consistent with Policy 2.6.1 b) and Policy 2.6.3 of the PPS.

The Proposed Redevelopment is consistent with Policy 2.6.2 of the PPS. The Site is located on rural lands which are proximate to settlement areas in Fergus and Elora (less than a 10-minute drive to central Fergus) and the Hamlet of Belwood. Services in those areas (retail, service commercial, health care, and other services) – in addition to existing services in the immediate surrounding rural area – are sufficient to adequately sustain the Proposed Redevelopment.

With respect to Minimum Distance Separation, a study and response letter was prepared by Stovel and Associates Inc. (SAI) which concluded that, “*based on Implementation Guideline #10 of Publication 853, MDS I setbacks*

do not need to be calculated for the Proposed Redevelopment, as the proposed amendments do not permit a more sensitive land use than existed before.” The Minimum Distance Separation Study is summarized in Section 5.13 of this Report. Therefore, the Subject Applications are consistent with Policies 2.6.4 and 2.6.5 of the PPS. Refer to the summary contained in Section 5.1.11 of this Report and the full study for details.

4.2.5 Sewage, Water and Stormwater

Section 3.6 of the PPS contains policies for sewage, water and stormwater services. Policy 3.6.1 states that *“planning for sewage and water services shall:*

- 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.*
- f) be in accordance with servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.”*

Policy 3.6.2 states that *“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.”* Policy 3.6.3 states that *“where municipal sewage services and municipal water services are not available, planned or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development to support protection of the environment and minimize potential risks to human health and safety.”*

Response: As noted, the Proposed Redevelopment will be serviced by a servicing block located on the NW Lands that will contain water and wastewater facilities. The intent is that this block and the associated infrastructure will be publicly owned and operated. The technical studies submitted in support of the

Subject Applications and summarized in Section 5.0 of this Report – such as the Functional Servicing Report (Section 5.7), Water and Wastewater Servicing Study (Section 5.12), and Fiscal Impact Study (Section 5.11) – demonstrate that the servicing approaches being evaluated appear to be from appropriate from a health and safety, environmental, and fiscal perspective, which is consistent with Policy 3.6.1 of the PPS. The evaluation of the preferred external servicing approach and consideration of municipal services will ultimately be concluded as part of an addendum to the Class Environmental Assessment which is underway. The Functional Servicing Report concludes that the Proposed Redevelopment can be developed and serviced. The Fiscal Impact Study, summarized in Section 5.11 of this Report, concludes that the construction of this infrastructure is financially feasible.

With respect to the servicing hierarchy outlined in Policies 3.6.2 through 3.6.5 of the PPS, the first portion of Policy 3.6.2 (municipal services within a settlement area) is not directly applicable, as the Site is not within a settlement area. Policy 3.6.2 provides clarification that “*municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.*” The proposed servicing approach on the Site would be considered a centralized servicing system. Next in the servicing hierarchy is Policy 3.6.3 which states that “*where municipal sewage services and municipal water services are not available, planned or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development.*” Provided the Township of Centre Wellington assumes ownership of the decentralized services, “*municipal sewage services*” and “*municipal water services*” would be “*available, planned, or feasible*” as these services would be owned by the municipality. The technical studies summarized in Section 5 of this Report demonstrate that the servicing approach is feasible. Therefore, the proposed servicing approach is consistent with the PPS.

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

Section 3.9 of the PPS outlines the policies for public spaces, recreation, parks, trails and open space. Policy 3.9.1 states, in part, that “*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 street network and public spaces in the Proposed Redevelopment will be designed 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 opportunities. The Proposed Redevelopment of the NW Lands includes the maintenance and refurbishment of the existing Fergus Golf Club 18-hole golf course, contributing to meeting the needs of persons of all ages and abilities, creating a recreation-based golf community, which is connected to the SE Lands (the proposed residential uses) through an existing pedestrian underpass connection. A pedestrian network is proposed in the subdivision via sidewalks on one side of the public streets. One parkette and one park block are provided within the Proposed Redevelopment, which will provide additional recreational opportunities for future residents of the new community. For the reasons outlined above, the Subject Applications are consistent with Policy 3.9.1 of the PPS.

4.2.7 Natural Heritage

Section 4.1 of the PPS outlines the policies for natural heritage. Policy 4.1.1 states that, *“natural features and areas shall be protected for the long term”* and Policy 4.1.2 states that *“the diversity and connectivity of natural features in an area, and for 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.”*

Response: An Environmental Site Assessment and Environmental Impact Study Addendum were prepared in support of the Subject Applications and are summarized in Sections 5.5 and 5.9 of this Report, respectively.

4.2.8 Cultural Heritage and Archaeology

Section 4.6 of the PPS outlines the policies for cultural heritage and archaeology. Policy 4.6.2 states that, *“Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.”*

Response: A Stage 1 Archaeological Assessment was prepared as part of the 2023 Approvals for the entire Site, a Stage 2 Archaeological Assessment was completed for the SE Lands, and a Stage 2 Archaeological Assessment was completed for a portion of the NW Lands encompassing the proposed servicing block. The Archaeological Assessment work completed to-date is summarized in Section 5.3 of this Report.

4.2.9 Provincial Planning Statement Summary

The Proposed Redevelopment is consistent with the PPS as it supports the creation of a recreation-based community that efficiently uses land and infrastructure while maintaining rural character and protecting natural heritage features and areas. The Proposed Redevelopment provides 446 single-detached residential lots and improvements to the Belwood Golf Club, contributing to a mix of housing and recreation opportunities consistent with PPS policies for people and homes, housing, and rural areas. Located on rural lands, the development leverages existing rural amenities such as the golf course, Belwood Lake, and local trails, and is supported by appropriate servicing infrastructure that meets PPS requirements for sewage, water, and stormwater management. The proposal includes sidewalks, a park, a parkette, and pedestrian connections that promote active transportation and provide public spaces. Therefore, the Subject Applications are consistent with the PPS.

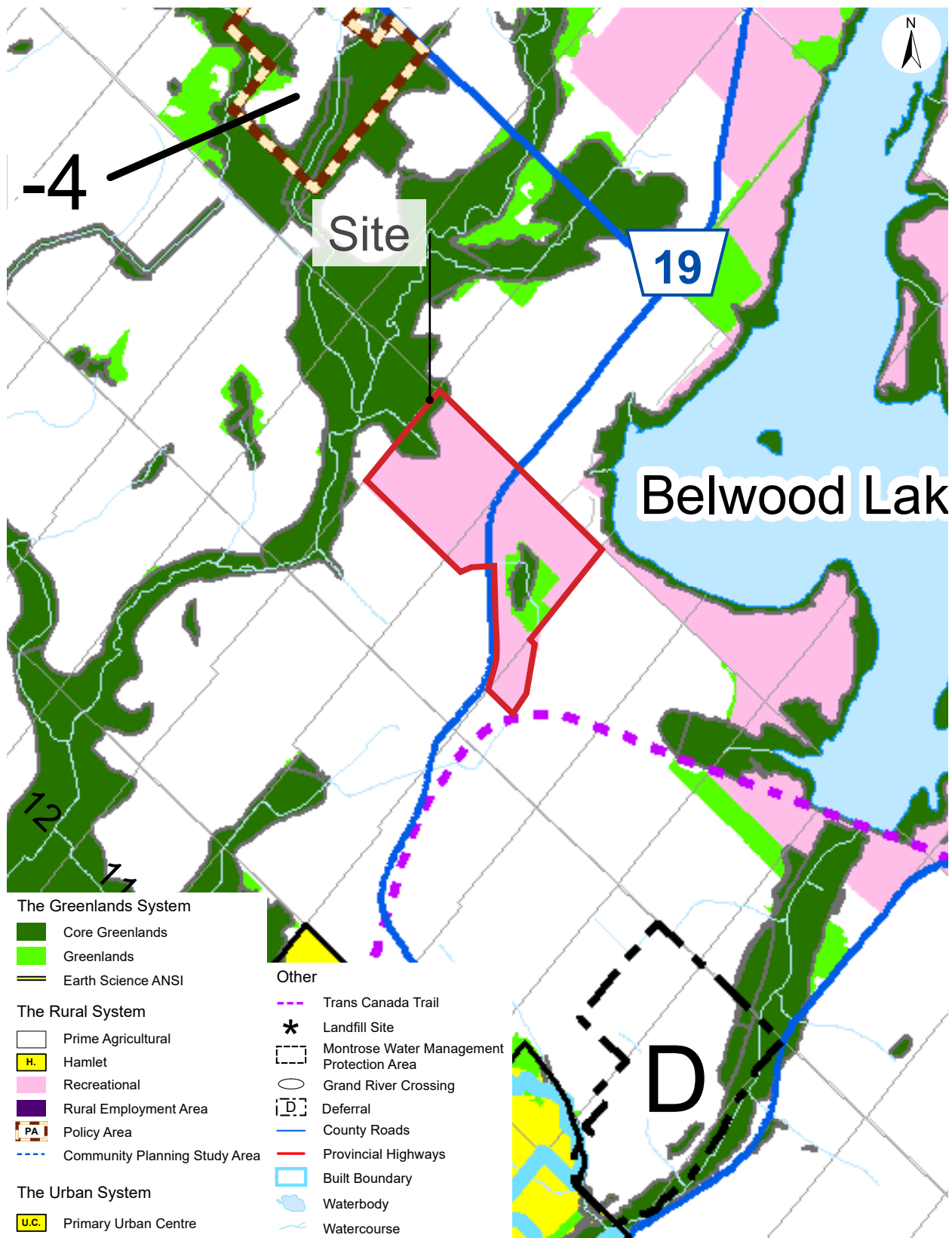
4.3 County of Wellington Official Plan

The County of Wellington Official Plan (“County Official Plan”) was adopted by County of Wellington Council on September 24, 1998, approved by the Ministry of Municipal Affairs on April 13, 1999, and came into effect on May 6, 1999. The WCOP outlines the long-term vision for County of Wellington’s communities and resources, and policy to attain the long-term vision. We note that the Township of Centre Wellington Official Plan (approved May 31, 2005) only applies to the urban centres of Fergus and Elora and is therefore not applicable to the Site. The County Official Plan is the operative Official Plan.

Within the County Official Plan, the Subject Site is primarily designated “Recreational,” with pockets of “Core Greenlands” and “Greenlands” (**Figure 5**). The Site is also subject to Policy 9.2.2, a Local Policy which was amended as part of the 2023 Approvals. Policy 9.2.2 permits

residential uses as a secondary use to the Belwood Golf Club (formerly Fergus Golf Club) and is further discussed in Section 4.3.6 of this Report.

The following subsections provide a summary of the key County Official Plan policies that apply to the Site and the Proposed Redevelopment and justification in response to said policies.



4.3.1 Housing

Section 4.4 of the County Official Plan outlines the policies for housing. Policy 4.4.2 states that *“the County will provide for a variety of housing types to satisfy the present and future social, health and well-being requirements of residents of the regional market area. New residential developments will be promoted at densities which efficiently use available servicing and are appropriate to site conditions and existing patterns of development.”*

Response: The current recreational designation (and site-specific policies) and zoning for a resource-based residential community has long been envisioned and permitted on the SE Lands. In the surrounding area around Belwood Lake, there are a variety of cottage, life lease, and estate residential areas, as well as seasonal trailer parks and campgrounds. Accordingly, the Proposed Redevelopment is of an appropriate type and density to reflect the site conditions and rural context of the Site.

4.3.2 Public Spaces, Parks and Open Space

Section 4.11 of the County Official Plan contains policies for public spaces, parks and open space, and states that the County will *“promote healthy, active communities by:*

- a) planning public roads, streets and facilities to be safe, meet the needs of pedestrians and facilitate pedestrian and non-motorized movement, including but not limited to, walking and cycling;*
- b) providing for a full range and equitable distribution of publicly-accessible built and natural settings for recreation, including facilities, parklands, open space areas, trails, and where practical and appropriate, water-based resources;”*

Response: The Proposed Redevelopment conforms to County Official Plan policies for promoting healthy, active communities by providing a connected network of public streets and sidewalks on one side of the street that facilitate pedestrians and active transportation within the rural context. The internal public street network is designed to Township of Centre Wellington standards, will include a sidewalk network, and provides for active connections throughout the development. The design maintains natural features such as the central wetland area and provides additional public amenities, including one parkette and one park and access to the golf course on the NW Lands via a pedestrian underpass. A future trail connection to the Elora Cataract Trailway is planned through Block 454. The items noted above ensure equitable distribution of recreational opportunities and open

spaces for future residents, which conforms to Section 4.11 of the County Official Plan.

4.3.3 Core Greenlands and Greenlands

Section 5.4 of the County Official Plan provides policies for Core Greenlands areas. The Site is noted as having wetland areas, which are elaborated on in Section 5.4.1, which states that *“all wetlands in the County of Wellington are included in the Core Greenlands. Development and site alteration will not be permitted in wetlands which are considered provincially significant. Provincially significant wetlands are shown in Appendix 3 of this Plan. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted. The appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland.”* Further policies (Policy 5.4.2) indicate that *“development and site alteration will not be allowed in significant habitat of endangered or threatened species except in accordance with provincial and federal requirements. Development or site alteration adjacent to significant habitat of endangered or threatened species shall require a satisfactory Environmental Impact Assessment that demonstrates there will be no negative impact on the significant habitat of endangered or threatened species or its ecological function.”*

Section 5.5 of the County Official Plan provides policies for Greenlands, which applies to *“other significant natural heritage features including habitat, areas of natural and scientific interest, streams and valleylands, woodlands, environmentally sensitive areas, ponds, lakes and reservoirs and natural links are also intended to be afforded protection from development or site alteration which would have negative impacts.”* It further states that *“these areas are often found within Core Greenlands. Where they are outside Core Greenlands they are identified as Greenlands.”*

Response: As part of the Subject Applications, an Environmental Site Assessment (Section 5.5 of this Report) and an Environmental Impact Study Addendum (Section 5.9 of this Report) were completed, and the Subject Applications are consistent with the County Official Plan policies for Core Greenlands and Greenlands. Please refer to the full studies for details.

4.3.4 The Rural System

Part 6 of the County Official Plan outlines the policies for the rural system, which is defined as primary natural resource land and some other uses typically found in non-urban areas, such as rural housing. Section 6.3 states that that rural housing primarily supports natural resource activities such as farming and that non-farm related housing may be considered

in areas which do not conflict with resource related or other rural uses. Section 6.3 further states that *“new land uses, including the creation of lots... shall comply with the minimum distance separation formulae.”*

Response: The Proposed Redevelopment provides non-farm related housing, which is contemplated within the Rural System. The Proposed Redevelopment is currently permitted for residential development together with a golf course and ancillary uses and is zoned accordingly. Permanent and seasonal housing has long been established surrounding Belwood Lake, along with the site-specific residential permissions related to the former Fairview Golf Club (the SE Lands). Accordingly, the Proposed Redevelopment would be in keeping with historic uses and planning permissions and would not be out of context or character with the surrounding area. With respect to new lots and compliance with the Minimum Distance Separation Formulae, a Minimum Distance Separation Report was completed as part of the 2023 Approvals, and a response letter was provided in July 2026 and are summarized in Section 5.13 of this Report. The report concluded that because of existing approvals for non-residential uses, MDS I setbacks do not need to be calculated for the proposed redevelopment of the subject property. For the reasons outlined above, the Subject Applications conform to County Official Plan policies for the Rural System.

4.3.5 Recreational Areas

Section 6.7 of the County Official Plan outlines the policies for recreational areas. As noted above, the Site is partially designated “Recreational” in the County Official Plan. Recreational areas are defined as, *“recreational areas are normally land associated with lakes, reservoirs, ponds, rivers or other scenic resources which have potential for the development of recreational or seasonal residential uses relying on recreational activities. New Recreational Areas will be established by amendments to this Plan. Where new Recreational Areas are proposed in Prime Agricultural Areas, the policies of Section 4.3.3 c) shall be met.”* Permitted uses within the Recreational designation include seasonal recreational uses, active and passive recreational activities including golf courses; commercial activities related to and servicing recreational activities; and publicly-accessible built and natural settings for recreation, including parklands, open space areas, trails, and where practical and appropriate, water-based resources.

Response: The Proposed Redevelopment is intended to be integrated with the golf course on the NW Lands, and benefit from its proximity to other recreational amenities in the immediately surrounding area, meeting the intent of the designation. Residential uses and additional policies for recreational uses

are enabled by Policy 9.2.2 of the County Official Plan, which is a local policy in Centre Wellington specific to the Fergus Golf Course Recreational/Residential Area. Policy 9.2.2 is discussed in the following subsection.

4.3.6 Fergus Golf Course Recreational/Residential Area

Section 9.2 of the County Official Plan outlines the local planning policy for the Township of Centre Wellington. Section 9.2.2 of the County Official Plan states, that *“a public golf course, consisting of at least nine (9) holes, shall be permitted as well as a driving range and other ancillary uses, such as clubhouse, pro shop, maintenance facilities, and parking area. Secondary uses shall consist of residential uses to be developed in accordance with the policies of this subsection. This residential development of the property shall be limited to lands south of Wellington Road 19 [the SE Lands]. All residential units shall have access to private internal roads built to appropriate standards. No direct access shall be permitted for any residential unit to County Road 19 or 3rd Line. The maximum number of residential units permitted on the property shall be determined by a servicing capacity study to the satisfaction of the approval authority.”*

Response: It is our opinion that the Subject Application continues to conform to Policy 9.2.2. The Subject Applications modify the zoning and plan of subdivision from the 2023 Approvals, while continuing to conform to Policy 9.2.2 and does not require any modifications to this policy. The Proposed Redevelopment continues to facilitate a complete recreational/residential community that is integrated with the existing 18-hole golf course on the NW Lands, which conforms to the intent of Policy 9.2.2. We note that Policy 9.2.2 refers to all residential units having access to *“private internal roads built to appropriate standards.”* Despite the change in tenure from a residential common element condominium to a public residential plan of subdivision that does not include any private internal roads, the Proposed Redevelopment generally conforms with Policy 9.2.2, as the proposed public plan of subdivision will include a similar internal road network as the 2023 Approvals and will be built to Township of Centre Wellington standards. This interpretation is also consistent with Section 14.2 of the County Official Plan, which allows *“minor deviations from the text”* while *“keeping in mind the intent of this Plan and sound community planning principles.”* It is our opinion that the intent is maintained and that an amendment to the County Official Plan is not required. With respect to servicing, a Functional Servicing Report has been prepared in support of the Proposed Redevelopment, and it concludes that the Proposed Redevelopment can be developed and adequate servicing options are being evaluated as part of the Addendum to the approved Environmental Assessment. The water and wastewater treatment plants will

be sized accordingly for 446 dwelling units, and the outlet for the wastewater treatment plant is being established through the Environmental Assessment, which conforms to Policy 9.2.2; approval authorities (i.e. Township of Centre Wellington and County of Wellington) will review the study(ies) through the approvals process for the Subject Applications.

4.3.7 Creating New Lots

Part 10 of the County Official Plan contains policies for the creation of new lots. Policy 10.1.3 includes matters for consideration when consideration new lot creation by subdivision, consent or part lot control, stating that the County will consider the following matters:

“a) that any new lots will be consistent with official plan policies and zoning regulations;

Response: The lots will comply with Official Plan policies (such as Policy 9.2.2 discussed in Section 4.3.6 of this Report and other analysis included in this Report). We are of the opinion that no County Official Plan amendment is required to facilitate the Subject Applications. The lots will generally comply with the Township of Centre Wellington’s zoning regulations – specifically the base requirements of the R1C and R2 zones – with minor additional site-specific relief sought (refer to Section 6.1 of this Report for additional details and justification).

b) that all lots can be adequately serviced with water, sewage disposal, stormwater management or drainage, fire protection, roads, utilities, solid waste disposal to accepted municipal standards and without undue financial burden on the municipality;

Response: These items have generally been addressed through the technical studies summarized in Section 5 of this Report, such as the Functional Servicing Report, External Servicing Study, and Fiscal Impact Study. Adequate servicing options are being evaluated as part of the Addendum to the approved Environmental Assessment. It is anticipated that some of these items (i.e. fire protection) will be further reviewed through the approvals process for the Subject Applications, as needed and is typical. The proposed plan of subdivision will be designed to municipal standards.

c) that sufficient reserve water and sewage plant capacity will be available when lots are created in areas to be serviced by central water and sewage systems;

Response: Not applicable as the lands are proposed to be serviced by a new municipally owned communal servicing system.

- d) *that all lots will have safe driveway access to an all-season maintained public road and that access to a local road will be preferred over county and provincial roads, where practical.*

Response: The residential lots will be created through a draft plan of subdivision, which will include public roads that are maintained during all seasons. All residential lots front on collector or local roads internal to the Site's boundaries; only entrances to the broader subdivision have direct accesses to a County Road (Wellington Road 19) or Township Road (3rd Line).

- e) *that public streets, spaces and facilities will be safe, meet the needs of pedestrians, and facilitate pedestrian and non-motorized movement, including, but not limited to, walking and cycling.*

Response: The Proposed Redevelopment includes a connected network of public streets and sidewalks on one side of the street designed to be safe and accessible for pedestrians and cyclists of all ages and abilities. The layout promotes active transportation and community connectivity through features such as sidewalks along public streets, and an active transportation link between the SE and NW Lands through the existing underpass.

- f) *that the topography, soils and drainage of the site are satisfactory for the lot sizes and uses proposed;*

Response: The topography, soils and drainage of the site are satisfactory for the lot sizes and uses proposed, as demonstrated by the technical studies and drawings submitted in support of the Subject Applications (Stormwater Management Report, Functional Servicing Report, etc.).

- g) *that tree loss related to anticipated development be kept to a minimum and, wherever reasonable, be compensated for by new tree planting;*

Response: Tree removals will be compensated for by new plantings. Refer to the Arborist Report Addendum summarized in Section 5.14 for additional details.

h) that natural heritage features are not affected negatively;

Response: As part of the Subject Applications, an Environmental Site Assessment (Section 5.5 of this Report) and an Environmental Impact Study Addendum (Section 5.9 of this Report) were completed.

i) that lots are not created in areas which would pose a threat to public health or safety;

Response: No threat to public health or safety is anticipated; residential permissions on the Site have been enabled/anticipated since 1996, as outlined in Section 1.2 of this Report. As confirmed by Ainley Group's Water and Wastewater Servicing Study (Section 5.12 of this Report), the proposed pump station, located on Block 452, will utilize a forcemain to direct sewage from the SE Site toward the wastewater treatment plant on the NW Site underneath the proposed rights-of-way to the intersection of Street A and Wellington Road 19. Per the PPS, municipal sewage services and municipal water services are the preferred form of servicing [...] to support protection of the environment and minimize potential risks to human health and safety, which includes centralized and decentralized servicing systems.

j) that natural resources such as agricultural lands and mineral aggregates would not be affected adversely;

Response: With respect to impacts to agricultural lands, a Minimum Distance Separation Report was completed as part of the 2023 Approvals and a response letter was provided in July 2026 and is summarized in Section 5.13 of this Report. The report concluded that because of existing approvals for non-residential uses, MDS I setbacks do not need to be calculated for the proposed redevelopment of the subject property. A relatively small portion of the NW Lands are identified on Schedule D of the County Official Plan (Mineral Aggregate Resource Overlay); no impacts to mineral aggregates are anticipated as the majority of the development is proposed on the SE Lands. The NW Site will contain a golf course, and the SE Site contained a golf course with residential permissions and these uses have co-existed for many years with surrounding uses with no identified issues.

k) that the size and shape of the proposed lots is suitable, including frontage, area and the proportion of frontage to depth;

Response: As noted, the lots will generally comply with the Township of Centre Wellington's zoning regulations – specifically the base requirements of the R1C and R2 zones – with minor additional site-specific relief sought (refer to Section 6 of this Report for additional details and justification). Therefore, the lots are suitable in terms of size, shape, frontage, area, and proportion of frontage to depth.

- l) that the proposed lots and uses are compatible with and designed to minimize adverse impacts on surrounding uses;*

Response: Refer to the response in Section 4.2.3 of this Report response m) below for how the proposed lots and uses are compatible with surrounding uses. With respect to impacts to surrounding agricultural lands, a Minimum Distance Separation Report was completed as part of the 2023 Approvals and a response letter was provided in July 2026 and is summarized in Section 5.13 of this Report. The report concluded that because of existing approvals for non-residential uses, MDS I setbacks do not need to be calculated for the proposed redevelopment of the subject property.

- m) that all new lots shall have logical lot lines given existing lot patterns in the area, natural and human-made features and other appropriate considerations;*

Response: The lots are complementary to existing lot patterns in the area, and the subdivision layout is designed around the central wetland natural feature (to be preserved). The lots are complementary by having a similar “recreation” focus to the residential lots in the surrounding area which are proximate to Belwood Lake and other recreational amenities within the broader rural/agricultural area. The Proposed Redevelopment is complementary to the existing golf course on the NW Site, with the neighbourhood being a recreation-residential use. The lots in the surrounding area are generally oriented toward Belwood Lake and utilize private servicing, resulting in larger lot sizes to accommodate such servicing. As such, the Proposed Redevelopment contemplates lots which are smaller than that of the surrounding area, given the Proposed Redevelopment's utilization of proposed municipally owned water and wastewater services. With that being said, the larger 52-foot lots have been placed along Third Line to provide a gradual transition to the existing residential uses along Third Line and Rennie Boulevard, with the smaller lots being

provided internally to the SE Site. These lot sizes will make efficient use of the proposed infrastructure while respecting the existing natural features on the Site.

- n) that residential lots will have adequate access to community facilities such as schools, libraries and parks based on reasonable standards for the area;*

Response: The Proposed Redevelopment will utilize existing community facilities that are in proximity to the Site, including those located in Fergus, Elora, and Belwood. It is anticipated that the local school boards will be circulated as part of agency review of the Subject Applications to further review.

- o) that the creation of any lot is necessary, timely and in the public interest;*

Response: The creation of lots is necessary, timely and in the public interest as the Proposed Redevelopment will contribute to the meeting the projected needs for current and future residents of the regional market area. As discussed in Section 1.2 of this Report, the Site has longstanding permissions for residential uses/lots, and the Subject Applications will facilitate this development.

- p) that provincial legislation and policies are met, including the Greenbelt Plan policies set out in Section 9.9 of this Plan.*

Response: Provincial legislation and policies are met, as demonstrated in the analysis contained in Sections 4.1 (Planning Act) and 4.2 (Provincial Planning Statement) of this Report. The Site is not within the Greenbelt Plan area.

4.3.8 Water and Waste Water Services

Part 11 of the County Official Plan contains policies for environmental services, which refer to “*water and waste water services, storm water management facilities and waste management services.*” Policy 11.2.2 states that “*the following objectives apply to water and sewage services:*

- a) to protect the quality and quantity of ground and surface water;*
- b) to deliver an adequate supply of potable water and means of sewage disposal to meet the needs of existing and future residents and businesses;*

- c) to encourage development to use the highest level of service practical based on a priority of municipal, then private communal and then individual on-site services;*
- e) to promote efficient water use and to minimize waste water flows.”*

Policy 11.2.6 of the County Official Plan contains the following water and sewage policies for lands in the rural system outside of secondary urban centres and hamlets:

- “a) development in the rural system is anticipated to be on individual on-site systems where soil conditions are suitable over the long term;*
- b) private communal services may be allowed in recreational developments or it specifically allowed in a special policy area subject to the recommendations of a Servicing Options Assessment as set out in Section 11.2.3.”*

Response: While Policy 11.2.6 of the County Official Plan anticipates that development in the rural system will typically be serviced by individual on-site systems or privately owned communal systems, it does not prohibit or discourage municipally owned communal services. The policy framework appears to have not specifically anticipated this form of servicing; however, it is reasonable to interpret that municipally owned communal systems would be consistent with the intent of the policy, particularly where supported by appropriate technical studies. Policy 11.2.2 c) lends further support to this interpretation, as this policy places a clear priority on municipally owned services. The Proposed Redevelopment is intended to be serviced by a municipally owned and operated communal system located on the NW Lands, which includes water and wastewater facilities within a dedicated servicing block. Technical studies – including the Functional Servicing Report (Section 5.7 of this Report), Water and Wastewater Servicing Study (Section 5.12 of this Report), and Fiscal Impact Study (Section 5.11 of this Report) – confirm that this approach is feasible, environmentally responsible, and financially sustainable. Accordingly, the proposed municipally owned communal servicing approach conforms with policies in Part 11 of the County Official Plan. With respect to promoting efficient water use, the Proposed Redevelopment is consistent with Policy 11.2.2 e). A Water Supply Investigation was completed in support of the Subject Applications and is summarized in Section 5.6 of this Report. The Water Supply Investigation concluded that the Proposed Redevelopment can be adequately serviced, with no anticipated negative impacts to adjacent water users.

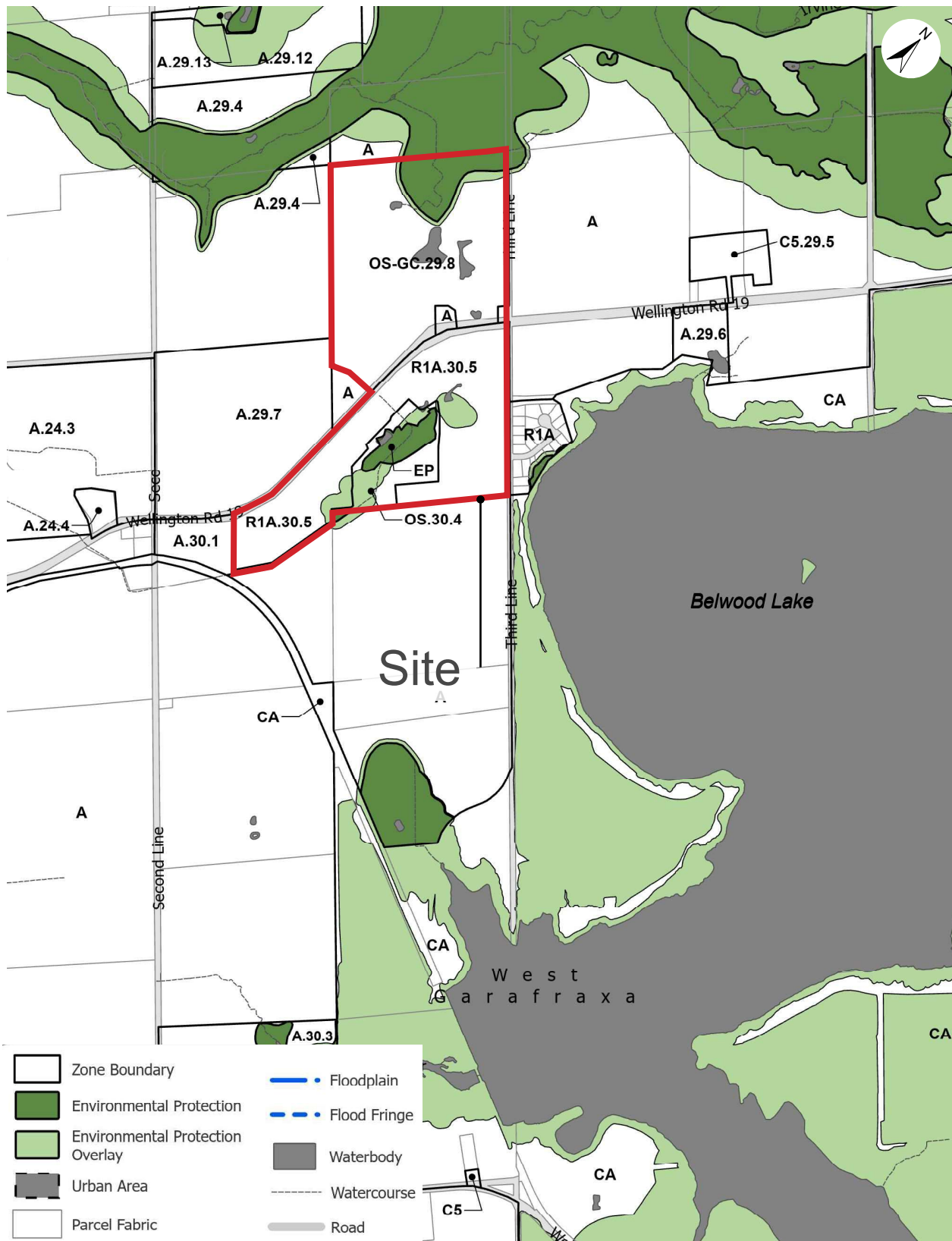
4.3.9 County Official Plan Summary

The Subject Applications conform to the County Official Plan by supporting its objectives for rural housing, recreation, environmental protection, and servicing. The Proposed Redevelopment establishes a recreation-based community that complements the surrounding area, providing a mix of housing, includes a park and parkette, and provides pedestrian connections that promote active transportation. Natural features, including the central wetland, are preserved in accordance with Core Greenlands and Greenlands policies, supported by technical studies confirming no negative environmental impacts. The proposed municipally owned communal servicing system, while not specifically anticipated by Policy 11.2.6, aligns with the intent of the County's servicing hierarchy and is demonstrated to be feasible, sustainable, and fiscally sound.

4.4 Township of Centre Wellington Zoning By-law

Under the Township of Centre Wellington Zoning By-law 2009-045, the SE Lands are zoned Residential R1A with Exception 15.30.5 (R1A.30.5), Open Space with Exception 15.30.4 (OS.30.4), and Environmental Protection (EP). The NW Lands are zoned Open Space Golf Course with Exception 15.29.8 (OS-GC.29.8) and Environmental Protection (EP). The above-noted zoning was established through the 2023 Approvals. **Figure 6** identifies the Site's current zoning.

The Subject Applications propose to rezone the Site to Residential R1C and R2 zones, with minor additional site-specific relief sought (refer to Section 6.1 of this Report for additional details and justification).



5. Supporting Studies

As part of the 2023 Approvals, a range of technical studies were completed and accepted. Many of these studies continue to apply to the Subject Applications and others have been updated to align with the particulars of the Proposed Redevelopment. Accordingly, Section 5.1 of this Report provides a summary of new reports, updated reports, and/or addenda to previous reports. These subsections present a summary of principal findings and recommendations and are not intended to replace the other reports and studies submitted. All studies should be read in their entirety in conjunction with this Planning Justification Report.

5.1 Geotechnical Report

A Detailed Geotechnical Report has been prepared by Gemtec Consulting Engineers and Scientists (“Gemtec”), dated June 5, 2026. The purpose of the geotechnical fieldwork was to confirm and further investigate the general subsurface conditions at the Site encountered in previous Site investigations by a means of a limited number of boreholes and, based on the factual data obtained, to provide engineering comments and recommendations on the geotechnical design aspects of developing the Site, including construction considerations that could influence design or construction decisions. Golder Associated Ltd./WSP (“Golder”) was previously retained to perform geotechnical investigations at the Site in 2022 at which time twelve boreholes were advanced across the SE Site to depths ranging from about 5.0 metres to 9.6 metres. The results of the previous geotechnical site investigations have been reviewed by Gemtec and the factual information from Golder’s earlier site investigation has been considered in support of the current geotechnical recommendations and conclusions.

The Geotechnical Report concludes that the Proposed Redevelopment is able to be accommodated on the Site, provided that topsoil and any organic or disturbed materials are stripped, and that engineered fill is placed and compacted where grade raises are required. Additionally, the native soils on the Site are generally suitable for shallow foundations and servicing, however, construction will need geotechnical oversight due to varying site conditions. Fine-grained soils are moisture sensitive, and some areas of the Site may require sub-excavation, proof rolling, or the replacement of soft zones.

The Geotechnical Report should be read in full in conjunction with this Planning Justification Report.

5.2 Water Balance Addendum

Gemtec Consulting Engineers and Scientists Limited (“Gemtec”) has prepared a Hydrogeological Study and Water Balance Addendum (“HGWB Addendum”) to the water balance assessment that was initially completed for previous submissions, dated July 2, 2026. The initial water balance assessment was presented in the hydrogeological investigation, dated November 11, 2024. An updated Hydrogeological Investigation (2026) can be found in Section 5.6 of this Report.

The HGWB Addendum should be read in full in conjunction with this Planning Justification Report.

5.2.1 Updated Water Balance Assessment

The post-development and mitigated post-development water balance assessments are updated to reflect the Proposed Redevelopment. Estimates of land use areas including open space, roads and roof area for the sanitary pumping station were estimated by drawings provided to Gemtec, and each lot is assumed to be 40 percent impervious with an average roof area of 242 square metres and a driveway area of 65 square metres.

A portion of the Site is located within a Wellhead Protection Area (“WHPA”) Q, as per the Grand River Source Protection Plan for the County of Wellington, Policy WC-MC-23.5, to ensure that a Recharge Reducing Activity does not become a significant drinking water threat and to maintain pre-development recharge to the greatest extent feasible, a water balance assessment is required for new developments.

As such, a water budget for the pre-development, post-development, and mitigated post-development was carried out for the entire Site as well as the WHPA-Q area within a portion of the Site. The results of these water balance(s) can be found in the HGWB Addendum.

The water balance assessment was updated to reflect the Proposed Redevelopment with assumptions applied as the low impact development (“LID”) framework and design details are still being finalized. LIDs are assumed to be implemented on all lots. The mitigated post-development water balance will be completed as part of the detailed design once features have been designed. It is recommended that the LID designer explores additional opportunities to promote further recharge. A review of the LID plans and in-situ infiltration rate testing is recommended to support detailed design of LID features. The infiltration rates of native soils and imported fill materials in areas where the grade is raised should be confirmed via field testing.

5.3 Archaeological Assessments

Stage Two Archaeological Assessment (2023) (SE Site and Portions of NW Site)

A Stage 2 Archaeological Assessment (“AA”) has been prepared by WSP, dated May 15, 2023, for the SE Site and portions of the NW Site. In 2021, Golder Associated Ltd. (a member of WSP) conducted a Stage 1 AA which concluded that the current use of the study area as a golf course indicates some level of subsurface disturbance, though it is not possible through visual assessment to determine to what extent the development of the golf course impacted subsurface cultural remains that may be present. As a result, a Stage 2 AA was recommended for the study area, including test pit survey at ten-metre intervals for portions of the study area.

The Stage 2 AA followed the recommendations of the Stage 1 AA and consisted of test pit survey at five- and ten-metre intervals. Test pit survey was conducted on both the SE Site and the NW Site, which resulted in the identification of two archaeological locations. The two locations are each represented by a single piece of lithic debitage. Despite the intensified survey at each location, no additional archaeological material was recovered. Lithic debitage is typically not diagnostic, therefore the age of cultural affiliation of the two locations could not be determined. The isolated nature of these artifacts suggests they are related to transient use of the area by Indigenous peoples that occurred during an unknown time period.

Given the isolated and non-diagnostic nature of the finds, the two locations are concluded to have no further cultural heritage interest or value as the sites do not meet the criteria identified in Section 2.2, Standard 1a of the *Standards and Guidelines for Consultant Archaeologists* (Government of Ontario, 2011) for determining the need for Stage 3 site-specific assessment.

Stage 2 Archaeological Assessment (2024) (Servicing Block)

A Stage Two AA has been prepared by WSP, dated March 12, 2024, for the proposed servicing block (Block 255). One location was identified along the southern edge of the of the study area through a single positive test pit bearing one biface thinning flake of Onondaga chert. Although intensified survey was conducted using the methodology described in the AA, no additional archaeological material was recovered. Onondaga chert is a high-quality raw material that outcrops along the north shore of Lake Erie east of the embouchure of the Grand River and may also be recovered from secondary glacial deposits across much of Southwestern Ontario, east of Chatham.

The Stage 2 AA followed the recommendations of the Stage 1 AA and consisted of test pit survey at 5-metre intervals.

Lithic debitage is not typically diagnostic, therefore the age or cultural affiliation could not be determined. The isolated nature of this artifact suggests that it is related to the use of the area by Indigenous peoples that occurred during an unknown period of time. Given the isolated and non-diagnostic nature of the find, the location is concluded to have no further cultural heritage value or interest as the site does not meet the criteria identified in Section 2.2, Standard 1a of the *Standards and Guidelines for Consultant Archaeologists* (Government of Ontario, 2011) for determining the need for Stage 3 site-specific assessment.

5.4 Environmental Noise Report

An Environmental Noise Report (“ENR”) has been prepared by Jade Acoustics Inc. (“Jade”), dated July 2, 2026. Table 3 of the ENR notes that the following noise abatement measures are required:

Lots	Air Conditioning	Exterior Wall	Window STC Rating	Sound Barrier	Warning Clause
Lots 1 and 346 to 351	Provision for Adding	Standard	Standard	2.5 m	A, B, C, D
Lots 171 to 184, 285 to 295, and 330 to 345	Provision for Adding	Standard	Standard	2.5 m	A, B, C
Lots 284 and 296 to 239	Provision for Adding	Standard	Standard	2.0 m	A, B, C
Lots 2, 3 and 170	Provision for Adding	Standard	Standard	No	A, B
Lots 239 and 240	-	Standard	Standard	No	D
All other lots	No special requirements.				

With the incorporation of the above-noted items, as discussed in Table 3, Notes to Table 3 and Figure 2 of the ENR, the sound levels will be within the appropriate MOE, community of Fergus, Township of Centre Wellington, and County of Wellington environmental noise criteria. In accordance with the Township, County and Ministry implementation guidelines where mitigation is required, future occupants will be advised through the use of warning clauses. For the future sanitary pumping station and wastewater and water treatment plant(s), a detailed noise analysis should be prepared by the proponent of these uses to ensure the Ministry of Environment noise guidelines are met at the proposed/existing noise sensitive receptors.

Prior to the issuance of building permits, the house plans should be reviewed by an acoustical consultant to ensure compliance with the applicable guidelines. The acoustic barriers should also be reviewed at that time to confirm they are proposed at the correct locations on the lot specific site plans and returning to the dwelling structures, as required. Prior to final occupancy, an acoustical consultant shall confirm that the acoustical requirements are in compliance with the acoustical report.

The ENR should be read in full in conjunction with this Planning Justification Report.

5.5 Environmental Site Assessment

Environmental Site Assessment (“ESA”) work has been prepared by Gemtec Consulting Engineers and Scientists Limited (“Gemtec”), which includes a Phase One ESA, dated May 30, 2024, for the SE Site.

The Phase One ESA indicated that a Phase Two ESA is underway. The Phase Two ESA will be completed once the draft plan of subdivision has been approved by the Township and County. No recommendations were provided in the Phase One ESA. As the Phase One ESA represents recent and historical conditions at the Site, the findings of the report are not affected by the revised development concept. Based on the above, the previous report is still valid with respect to the revised development plan and no further investigation (in addition to that already proposed) is recommended.

The Phase One ESA should be read in full in conjunction with this Planning Justification Report.

5.6 Hydrogeological Investigation and Water Supply

A Hydrogeological Investigation Report (“HI”) has been prepared by Gemtec Consulting Engineers and Scientists Limited (“Gemtec”), dated July 2, 2026. The HI should be read in full in conjunction with this Planning Justification Report.

5.6.1 Results

The goal of the pumping test was to evaluate the potential to obtain 14.4 L/s sustainably (at the maximum day demand) for the onsite wells to support the Proposed Redevelopment, without negatively impacting surrounding well and surface water users. The objective was obtained through a combined testing of PW21-1 and TW25-3 (8 L/s and 5.2 L/s, respectively), to be supplemented with additional pumping from TW25-2 (up to 1.2 L/s) even with additional interference testing coming from the North Irrigation Well. The location of these wells can be found in the HI. Testing indicated connectivity with surrounding bedrock wells, and it could be possible to use data obtained from this testing to project future impacts to surrounding bedrock wells. Overburden wells and shallow/surface water monitors showed no response to pumping and at least locally, the wells appear to be confined and isolated from ground surface.

5.6.2 Anticipated Next Steps

Next steps include the drilling and testing of TW26-4. This well will be constructed in a similar manner to the other on-site wells and is targeted to produce up to 6.5 L/s to supplement the system at 14.4 L/s should one of the PW21-1 or TW25-3 need to be taken offline for any reason. Drilling of this well is anticipated to be completed in June 2026.

Following the construction of this well, assuming it is able to produce sufficient water as indicated, additional testing scenarios including all four wells will be conducted onsite to confirm firm capacity. This testing will also include monitoring locations, to be sited in consultation with the Township, between this well site and the Fergus municipal wells. Additionally, firm capacity testing will include pumping of the North Irrigation Well which is anticipated to be used for the needs of the existing golf course. This testing is anticipated to be completed in July and August 2026.

Following the completion of the firm capacity testing, the data will be provided to the Township of Centre Wellington for incorporation into its wellhead protection area updates. This will result in wellhead protection areas (WHPAs) being delineated for each of the pumping wells.

5.7 Functional Servicing Report

A Functional Servicing Report (“FSR”) has been prepared by R.J. Burnside & Associates Limited (“Burnside”), dated July 2026. The FSR should be read in full in conjunction with this Planning Justification Report. The following provides a summary of the FSR:

5.7.1 Existing Water Infrastructure

The former Fergus Golf Club was supplied by an existing well on the NW Site. The former house on the SE Site had a water supply well that has been decommissioned as part of the earthworks operations. No other water services are provided within the SE Site.

5.7.2 Water Distribution

A Water Servicing Strategy has been prepared by Ainley Group and is summarized in Section 5.14 of this Report. The design criteria has been summarized as follows:

Average Water Demand:	2.54 L/s
Maximum Day Flow:	7.43 L/s
Peak Hour Flow:	10.50 L/s
Peak Inst. Flow:	15.80 L/s
Normal Operating Pressure Range:	345 kPa (50 psi) to 552 kPa (80 psi)
Peak Hour Operating Pressure Range:	275 kPa (40 psi) to 700 kPa (100 psi)
Minimum Max Day plus Fire Flow Pressure:	140 kPa (20 psi)

The preliminary water distribution plan indicates the layout for the proposed 150 mm watermain within the SE Site as well as the connection to the water supply location on the NW Site. A minimum cover of 2.0 metres will be ensured for the entire length of water services within the Site. Hydrants will be in accordance with the Centre Wellington Development Manual and as shown on the CUSP, providing adequate coverage with a maximum spacing of 200 metres alongside residential roads.

Additional details related to water distribution can be found in Ainley Group's Water and Wastewater Servicing Study, which is summarized in Section 5.14 of this Report.

5.7.3 Wastewater Servicing

Existing municipal sanitary services are not available to the Site; therefore, on-site servicing is required. The existing golf course facility is currently serviced by a small Ecoflo peat biofilter and area bed system with an approximate capacity of 5,500 L/day, located on the NW Site. This system will be decommissioned and removed as part of the Proposed Redevelopment.

The layout and approach to the treatment and disposal of wastewater will be determined with an Addendum to the Class Environmental Assessment. The residential lots within the SE Site will be serviced by a gravity sanitary sewer network that will convey flows to a proposed pumping station located across from the stormwater management block (Block 452). A forcemain is then proposed to transfer flows to the NW Site where it will be processed through the proposed treatment facility. The layout for the proposed sanitary gravity sewer and forcemain layout can be found in the Functional Servicing Report.

5.7.4 Utilities

Utilities will be installed in a joint utility trench. Design will be provided by utility companies. There are connections for electrical supply adjacent to the perimeter of the SE Parcel and during detailed design, consultation with Union Gas (natural gas) and Centre Wellington Hydro/Hydro One (hydro), will be made to confirm adequate external utility supply will be confirmed.

5.7.5 Roadways

Street A, portions of Street B, and the entirety of Street F are proposed with a 20.0 metre right-of-way. The cross-section is a modified version of the Township of Centre Wellington's standard 20.0 metre road design. The modifications include the addition of a bypass pipe, forcemains, and a Foundation Drain Collector ("FDC") system. The extent and configurations of each of these systems are shown in the servicing drawings.

The roadways within the remainder of the Proposed Redevelopment are proposed with an 18.0 metre right-of-way. This cross section is a modified version of the Township of Centre Wellington's standard 18.0 metre road design. The modifications include the addition of a forcemain and a FDC system.

5.7.6 Phasing

Due to economic reasons, it is the Applicant's intention to phase the Proposed Redevelopment where it is expected that there will be four phases of construction. The intent would be that every phase would have appropriate access and servicing to accommodate that phase.

The first phase would include the full stormwater management facility, pumping station, water supply and treatment system and the wastewater treatment and disposal system. It is expected that the roads and underground servicing would be completed first. The construction of the water and wastewater treatment plants, the water supply, the effluent outlet, and the pumping station would be completed in parallel to the house construction such that occupancy of the homes would only occur after the completion of the treatment and supply infrastructure.

5.7.7 Erosion and Sediment Control

The erosion and sediment control plan for the Site will be developed in accordance with the Township of Centre Wellington and Grand River Conservation Authority guidelines. This plan will be completed at the detailed design stage, prior to the undertaking of any grading activity on the Site. Erosion and sediment control will be implemented for all construction activities including topsoil stripping, foundation excavation, and stockpiling of material. The FSR contains a list of erosion and sediment control measures that will be implemented.

5.8 Stormwater Management Report

A Stormwater Management Report (“SWM Report”) has been prepared by Burnside, dated July 2026. The SWM Report should be read in full in conjunction with this Planning Justification Report. The following provides a summary of the SWM Report

5.8.1 Site Grading and Storm Drainage

Under existing conditions on the NW Site, the majority of the north half of the Site (the golf course) drains via sheet flow to the Armstrong Drainage Works, and the remaining portion of the north half drains by sheet flow toward the adjacent lands to the west, the Wellington County Road 19 right-of-way, and the existing roadside ditches along the east side of Third Line, ultimately discharging toward Belwood Lake. The remainder of the Site, including the SE Site, drains via sheet flow to the existing wetland feature located on the south side of Wellington Road 19. From there, flows continue to the open-channel section of the Black Drainage Works along the southern boundary of the Site. The Black Drainage Works is a Municipal Drain that conveys flows in an open channel to Irvine Creek, which ultimately discharges to the Grand River in Elora.

The conceptual site grading design for the SE Site has been developed in consideration of the following requirements and constraints:

- Conformance with the Township of Centre Wellington grading and drainage criteria;

- Incorporating existing grades at road access points to Wellington Road 19 and Third Line;
- Matching existing boundary grades at the property limits and existing wetland and wooded areas identified for protection;
- Optimization of earthworks (i.e., minimization of fill);
- Provision of adequate cover over proposed services;
- Provision for overland flow conveyance on the roadways to the proposed stormwater management ponds (i.e., major system storm drainage and emergency overland flow);
- Conveyance of stormwater within site and minimizing external runoff;
- Incorporating proposed noise barriers along Wellington Road 19; and,
- Regrading of the municipal ditches as required for adequate drainage of Third Line and Wellington Road 19, as required for the Proposed Redevelopment.

5.8.2 Stormwater Management Design Criteria

Based on the Township of Centre Wellington's Development Manual (2024), the stormwater management criteria for the Site is as follows:

- Attenuate post-development peak flows to the pre-development levels for all design storm events (2-100 year); and,
- Provide enhanced (80% TSS total suspended solids) water quality treatment prior to discharge from the site.

5.8.3 Stormwater Management Plan

The required stormwater management controls for the Proposed Redevelopment will be achieved through the use of two stormwater management facilities and the existing wetland. Flows to the various existing outlet locations for the north and south parcels, including the adjacent lands, the Armstrong Drainage Works, Belwood Lake and the Black Drainage Works will be maintained and utilized as part of the Proposed Redevelopment.

Minor and major system post-development flows from the north parcel will be directed to the stormwater management facility on the north parcel, prior to discharge to the existing wetland and ultimately the existing Black Drainage Works.

The minor system post-development flows from the SE Parcel, including the proposed rights-of-way and the majority of the development area, will be directed to the stormwater management facility via a local storm sewer network. Minor storm flows from the rear lot areas and external drainage areas will be directed to either the existing wetland or to the existing Black Drainage Works.

Major system flows will be routed to the stormwater management facility, the existing wetland or directly to the existing Black Drainage Works via the rights-of-way and overland flow routes as required.

Roof drainage from the individual lots will be directed to pervious surfaces to promote infiltration and reduce surface runoff. Quality control treatment for runoff generated from the Proposed Redevelopment will be provided via the two stormwater management facilities and three oil/grit separator structures, prior to discharge from the site.

5.8.4 Post-Development Condition Stormwater Drainage

Runoff generated from the majority of the NW Site (golf course) will continue to discharge via sheetflow to the Armstrong Drainage Works. The remainder of the NW Site will drain via sheetflow to the adjacent lands located to the west, the Wellington County Road 19 right-of-way, and the existing roadside ditches located along the east side of Third Line to Belwood Lake.

Post-development runoff generated from the remainder of the Site, including the SE Site, will be captured, conveyed, and discharged to either the existing wetland feature or the stormwater management facility, and ultimately to the open channel portion of the Black Drainage Works located along the south boundary of the Site. Hydrologic modelling outputs are summarized in the SWM Report.

5.8.5 Quantity Control

Two stormwater management ponds, known as the North Pond and South Pond, have been provided. For the North Pond, water quality control treatment will be provided by an oil/grit separator structure prior to discharge to the downstream outlet. Post-development runoff will be collected and conveyed through the on-site storm sewer system to the North Pond, located on the north side of Wellington County Road 19. This pond is designed with 5:1 side slopes, and a multi-staged outlet structure consisting of a 100 mm diameter orifice, a 450

mm diameter outlet pipe and a 15-metre-long emergency overflow weir. A geosynthetic clay liner has been proposed for the North Pond to address concerns related to high groundwater levels. The operating characteristics of the North Pond are summarized in the SWM Report.

The South Pond has been designed with 5:1 side slopes throughout and a four-metre-wide access road to provide access to the forebay, pond inlet and outlet. Discharge from the pond will be directed to the existing wetland and ultimately to the Black Drainage Works. A geosynthetic clay liner has been proposed for the South Pond to address concerns related to high groundwater levels. The operating characteristics of the South Pond are summarized in the SWM Report.

The existing wetland is located in the centre of the SE Site and ultimately conveys flows to the Black Drainage Works. Flow from the existing wetland to the Black Drainage Works will be provided via a dedicated 450 mm diameter storm sewer (at a grade of 0.2 percent), ultimately discharging flows to the existing channel along the south limit of the Site and the Black Drainage Works. The operating characteristics of the existing wetland are summarized in the SWM Report.

5.8.6 Quality Control

Enhanced stormwater quality control treatment for runoff generated from the Proposed Redevelopment will be achieved through the use of water quality treatment measures, including the provision of a forebay and permanent pool in the proposed South Pond, as well as through the use of oil/grit separator structures. Details related to quality control are summarized in the SWM Report.

5.9 Environmental Impact Study Addendum

An Addendum to the Environmental Impact Study (“EIS”) has been prepared by Beacon Environmental, dated July 2, 2026. Previous EISs and addenda were prepared by Beacon in support of the previous development application and Site Alteration submissions. The original EIS was provided in February 2022, which was followed by an updated EIS (April 2023) and EIS Addenda (December 2023 and July 2024).

This EIS Addendum relies on the findings of the previous EIS and addenda submissions and is intended to address the changes to the proposed development plan and associated impacts on natural heritage features. This EIS Addendum includes a consolidated list of mitigation and enhancement measures to protect, restore, and enhance the natural heritage features associated with the Site:

- Implement an Erosion and Sediment Control Plan using the Erosion and Sediment Control Guidelines for Urban Construction;
- Implement the tree preservation recommendations as per the Tree Inventory and Preservation Plan;
- Provide 2:1 replacement for removal of healthy non-woodland trees with a diameter at breast height of >10 cm. As per the Arborist Report Addendum, 670 replacement trees are recommended and can be achieved through the subdivision landscape plans;
- Implement recommendations of the Hydrogeological Investigation;
- Implement wetland restoration plans to compensate for wetland removal (plans to be updated at detailed design);
- Implement wetland buffer restoration plans (plans to be updated at detailed design);
- Implement woodland management and enhancement plans to improve the ecological functions of the remaining woodlands on the Site;
- Implement a woodland edge management plan to mitigate impacts on the remaining forest community where new woodland edges are created as a result of tree removals (plans to be updated at detailed design);
- Provide native species plantings along the re-aligned drainage corridor south of the SWM pond outlet and consult with the GRCA and Department of Fisheries and Oceans Canada (“DFO”) to ensure compliance with the Conservation Authorities Act and Fisheries Act;
- Install permanent fencing along residential lots abutting natural features and buffers to help prevent encroachment-related impacts (e.g., dumping of yard waste, informal trail, removal of vegetation, etc.);
- The federal Migratory Birds Conservation Act (1994) and provincial Fish and Wildlife Conservation Act protect the nests, eggs and young of most bird species from harm or destruction. As the breeding bird season in southern Ontario is generally from early April to August, the clearing of vegetation should occur outside of these periods. For any proposed clearing of vegetation within these dates, or where birds may be suspected of nesting outside of typical dates, an ecologist should undertake

detailed nest searches immediately prior to site alteration to ensure that no active nests are present;

- Register activities associated with the removal of additional woodland area (ELC Unit 8c) in relation to endangered bats to ensure conformity with the Species Conservation Act (“SCA”); and,
- Provide 1:1 compensation for the loss of total woodland area (4.81 hectares) from the Site or a cash-in-lieu alternative that could be dedicated to a public agency for off-site woodland restoration within the Township.

The currently proposed Draft Plan of Subdivision and grading plan do not affect the overall conclusions and recommendations of the previous EISs and EIS Addenda. Additional impacts to natural heritage and hydrological features resulting from the Proposed Redevelopment as compared with the previous draft include removal of 0.85 hectares of woodland and associated bat habitat and realignment of a short segment of the Black Drain. Conversely, the Proposed Redevelopment does not require grading within the wetland buffer, nor does it require trails within the central woodland or along the Black Drain, thus removing the potential for impacts on the woodland, wetland, and drainage features.

Impacts on natural heritage and hydrologic features can be avoided, minimized, or offset by implementing the recommendations outlines above and within the EIS Addendum. A permit will be required from the GRCA to accommodate the realignment of the Black Drain and consultation with DFO is recommended to ensure conformity with the Fisheries Act. The proponent will be required to register activities associated with the removal of additional woodland area (ELC Unit 8c) in relation to endangered bats to ensure conformity with the SCA.

The EIS Addendum should be read in full in conjunction with this Planning Justification Report.

5.10 Urban Transportation Considerations Report

An Urban Transportation Considerations Report (“TIS”) has been prepared by BA Consulting Group Ltd. (“BA”), dated July 2026.

Wellington Road 19 is identified as a Wellington County arterial road and 3rd Line is identified as a Wellington County local road. The Township of Centre Wellington does not currently operate a local public transit system and there are no plans at this time to establish transit service in the vicinity of the Site. In the vicinity of the Site, Wellington Road 19 includes

paved shoulders for cyclists and there are future plans to extent the paved shoulders east of Third Line. Just south of Wellington Road 19, there is an off-road “spine route” known as the Elora Cataract Trailway, a 47-kilometre-long trail between Elora and Forks of the Credit Provincial Park. The trail is located along the southern edge of the SE Site, and crosses 2nd Line, 150-metres southeast of Wellington Road 19. There is a pedestrian tunnel under Wellington Road 19 which provides connectivity between the SE Site and the NW Site. The proposed public road network for the Site includes sidewalks along one side of the road.

The Site is forecasted to generate 335, 445 and 410 two-day residential vehicle trips during the weekday morning, weekday afternoon and Saturday peak hours, respectively. The golf club (NW Site) is expected to generate in the order of 35 two-way vehicle trips during the weekday morning peak hour and 55 two-way vehicle trips during the weekday afternoon and Saturday peak hours. Since no information regarding existing traffic associated with the golf course on the NW Site was available, a conservative approach was adopted, wherein the estimated vehicle trips were added to the network to account for the new golf course entrance, and no traffic was removed. All intersections in the study area, including the Site access points, are expected to operate under capacity under future total conditions.

Under future total conditions in 2038, traffic signals are not warranted under Justifications 1 and 2 at the intersections of Wellington Road 19 and 2nd Line (98 percent compliance). As the compliance score is 98 percent (peak summer months in 2018) for Justification 1, and because Justification 2 reaches 81 percent, the warrant is met under Justification 3 (combination of warrant). The County should consider monitoring this intersection to determine if traffic signals are warranted in the future, as the need for traffic signal will be dependent upon future growth being realized. For the intersection of Wellington Road 19, SE access, and the golf course, it is determined that under future total conditions in 2038, traffic signals are “unlikely to be warranted” at the intersection (80 percent compliance).

All minimum required sight distances are met along both Wellington Road 19 and Third Line. Available sight distances are dependent on the right-of-ways being clear of vertical obstructions up to the ditch line. Tree trimming may be required to maintain adequate sight distance, particularly at the site access along Wellington Road 19.

The highest left-turning volume at the site access was estimated to be 75 vehicles per hour and occurs during the weekday afternoon peak period. The highest left-turning volume at the relocated golf club driveway was estimated to be 15 vehicles per hour and occurs during the weekday afternoon and Saturday peak period. As part of the redevelopment of the site, the construction of eastbound and westbound left-turning lanes is recommended on Wellington Road 19 at the site access (Street A / golf course).

Based on the foregoing, with the implementation of the recommended road improvements, the Proposed Redevelopment can be accommodated on the future transportation network.

The TIS should be read in full in conjunction with this Planning Justification Report.

5.11 Fiscal Impact Study

A Fiscal Impact Study (“FIS”) has been prepared by KPEC Planning & Economic Consulting Inc., dated July 2, 2026. The FIS should be read in full in conjunction with this Planning Justification Report. The FIS is summarized below:

It is estimated that the Proposed Redevelopment will generate \$16.1 million in development charges (“DCs”) for the Township of Centre Wellington and \$5.1 million in DCs for Wellington County. A comparison of the incremental annual revenues with incremental annual expenditures resulting from the Proposed Redevelopment at build-out, shows an estimated combined annual fiscal surplus for the municipalities, including a surplus of \$161 per capita/job for the Township and \$421 per capita for the County; the estimate is based on estimated incremental annual revenues and expenditures related to the Proposed Redevelopment at build-out, as shown in Figure 2 of the FIS.

The true net annual fiscal impact can vary from the estimates presented in the FIS, depending on numerous variables that may deviate from the assumptions made in the FIS, including timing of development, infrastructure costs, changes in property tax rates, assessment values, among many other inputs. The fiscal impact analysis is best used on a ‘directional’ basis to give an indication of the likely orientation of fiscal impact (positive versus negative) as well as providing a rough indication to decision-makers regarding the potential scale of impact.

While the results summarized in the FIS are above the estimated annual incremental revenues and costs that the Township and County would accrue each year from build-out onward, during the development process, the interim fiscal impacts will depend on the pace of development, and the ability of capital works (both internal and external) to be constructed and put into operation in a timely manner. The operating and maintenance costs associated with community services and needed infrastructure will include a variety of ‘fixed’ costs that will be incurred whether development happens or not, and ‘variable’ costs that will depend on need generated by persons living in the community.

Should the Proposed Redevelopment generate an annual surplus as estimated in this report, it could be used to mitigate future property tax increases, increase contributions to a

tax rate stabilization fund reserve, expand municipal services, fund backlogged state of good repair works, or some combination thereof.

5.12 Water and Wastewater Servicing Study

A Water and Wastewater Servicing Study (“Servicing Study”) has been prepared by Ainley Group, dated June 30, 2026. The purpose of the Servicing Study is to identify alternatives for water and wastewater servicing concepts. The Servicing Study should be read in full in conjunction with this Planning Justification Report.

5.12.1 Water Supply and Treatment

Raw water will be drawn from three or four drilled production wells on the NW Site, with a confirmed firm pumping capacity of at least 14.4 litres per second (largest well out of service). The water treatment plant (“WTP”), housed in an approximately 200 square metre steel building, will provide primary and secondary chlorine disinfection to achieve 4-log virus inactivation per O. Reg 170/03. An above-ground standpipe will provide 2,5030 cubic metres of treated water storage, including fire flow storage, equalization storage, and emergency storage. A dedicated booster pumping station will maintain distribution system pressures between 345 kPa and 552 kPa under normal operating conditions. The WTP, standpipe, and booster station will be co-located and adjacent to the wastewater treatment plant (“WWTP”), with a minimum 15-metre separation between potable and wastewater infrastructure. A shared diesel standby generator will provide backup power to both facilities.

5.12.2 Wastewater

Wastewater from the SE Site will drain by gravity to a sewage pumping station (“SPS”) on the southeast parcel, designed for a peak instantaneous flow of 37 L/s. a 250 mm HDPE forcemain, approximately 770 metres in length, will convey flows across Wellington Road 19 to a package membrane bioreactor WWTP on the NW Site. The WWTP is sized for a combined average daily flow of 496 cubic metres per day from the subdivision and the golf course and will occupy a preliminary footprint of approximately 900 square metres. The treatment train includes screening, grit removal, flow equalization, dual-train biological nutrient removal with MBR membrane separation, alum dosing for phosphorus removal, and UV disinfection. Solids handling comprises rotary drum thickening, aerobic digestion, and 240-day winter sludge storage. Treated effluent will be conveyed by a dedicated forcemain to either Belwood Lake or the Grand River, with the preferred alignment to be selected through the EA Addendum and assimilative capacity assessment.

5.13 Minimum Distance Separation Opinion

A Minimum Distance Separation (“MDS”) Opinion has been prepared by Stovel and Associates Inc. (“SAI”), dated June 2026. SAI had previously completed an MDS Report, dated February 16, 2022, as well as an updated response letter in February 2023. Further, SAI has provided an updated MDS opinion letter to reflect the Proposed Redevelopment, dated July 2, 2026.

In 2022, SAI’s report concluded that the MDS Guidelines recognize redevelopment scenarios where existing approvals are already in place for non-agricultural uses, and the previous MDS analysis concluded that the existing and approved recreation/residential uses on the Site were considered Type B Land Uses for the purposes of Publication 853. The proposed redevelopment continues to involve residential development on the SE Site, and the continuation/redevelopment of the golf course on the NW Site. While the current proposal revises the unit count, tenure, servicing approach and road ownership, these changes do not result in a change from a Type A Land Use to a Type B Land Use for the purposes of MDS. Rather, the proposal remains a continuation of Type B Land Uses on lands that are already designated, zoned, and approved for non-agricultural recreational/residential development. Further, the 2023 response further confirmed that the proposed redevelopment conforms to the requirements of the MDS Formula and subsequently conforms to Official Plan policy 9.2.2 with respect to considerations of MDS I setbacks.

With respect to the updated Proposed Redevelopment, the proposal has changed with respect to unit count, tenure, road ownership, and servicing approach, but it does not introduce a more sensitive land use than what previously existed or was previously approved for the Site. The proposal remains a continuation of Type B Land Uses. It remains SAI’s opinion that the Proposed Redevelopment does not change the conclusions of the 2022 MDS Analysis or the 2023 response letter. Based on Implementation Guideline #10 of Publication 853, MDS I setbacks do not need to be calculated for the Proposed Redevelopment, as the proposed amendments do not permit a more sensitive land use than existed before.

5.14 Arborist Report Addendum

Beacon Environmental (“Beacon”) has prepared an Arborist Report Addendum (“AR”) in support of the Proposed Redevelopment, dated July 2, 2026. An Arborist Report and Tree Inventory and Preservation Plan were completed in April 2023 and revised in December 2023 and submitted as part of the 2023 approvals. Beacon has provided this addendum as a response to the changes from the 2023 approvals, as reflected in the Proposed

Redevelopment. The AR should be read in full in conjunction with this Planning Justification Report.

5.14.1 Tree Removals

For the previously approved Draft Plan, 333 individually mapped trees and 292 trees within tree grouping A, B, C< and E were required to be removed to accommodate development; however, 290 of these trees were dead or dying. An additional 120 dead or dying trees, outside of the development plan area were recommended for removal due to condition. The majority of these trees have already been removed from the subject property to facilitate grading and pre-servicing following approval from the previous development plan.

While the majority of trees approved for removal have been removed, there are three additional trees which require removal based on the revised Draft Plan and associated grading plan, specifically Trees 362, 366, and 367, as shown in the AR. Therefore, the total number of trees to be removed is 748, with only 338 trees considered healthy, and the remaining 410 dead or dying.

5.14.2 Tree Replacement

It is proposed that only healthy trees (i.e., in fair, fair to good, and good condition) be compensated for at a 2:1 replacement ratio. In this regard, 676 replacement trees will be required. Replacement trees should be planted throughout the subdivision, including Open Space blocks. It is Beacon's understanding that the County of Wellington will not accept street trees as compensation for tree removals; however, trees in excess of the one tree per lot requirement have been proposed as part of the subdivision landscape plans. Landscape plans will be prepared at detailed design, which will include tree replacement plantings.

5.14.3 Tree Preservation

22 individual trees and one tree grouping (tree group D) are identified for preservation along the property limits. There is potential for damage to occur to trees during construction if proper precautions and protection measures are not implemented. Trees can be negatively impacted through grade changes, soil compaction, root cutting, and mechanical damage to trunks and branches resulting from the operation of construction equipment. The AR includes minimum Tree Preservation Zones based on tree DBH.

5.15 Community Design Guidelines

Community Design Guidelines have been prepared by GSP Group, dated July 2026. The Community Design Guidelines have been developed to provide a comprehensive design

analysis of the Proposed Redevelopment, addressing site context, built form, streetscape design, open space network, and connectivity to ensure a high-quality, integrated, and pedestrian-friendly community. It contains recommendations to support the creation of a cohesive, well-designed neighbourhood that aligns with the Township of Centre Wellington's urban design objectives while responding to the unique characteristics of the Site.

The Community Design Guidelines should be read in full in conjunction with this Planning Justification Report.

6. Proposed Zoning By-law Amendment

The Subject Applications include a (1) Zoning By-law Amendment and (2) a Revision to Draft Plan of Subdivision 23T-22001. This section summarizes the proposed Zoning By-law Amendment. The Revision to the Draft Plan of Subdivision is summarized in Section 1.3 of this Report. The Zoning By-law Amendment will apply to the entire Site and generally maintains the zoning categories and regulations established through the 2023 Approvals.

6.1 SE Lands – Residential Zoning (R1C.XX.X and R2.XX.X)

6.1.1 R1C.XX.X Zone

For the residential portion of the SE Lands, the 2023 Approvals established Exception 15.30.5 with Zone Code R1A.30.5. The Exception included regulations for maximum number of units and corresponding lot regulations (frontage, lot area, building height, etc.).

The Subject Applications contemplate rezoning the 38', 45', and 52' lots (318 lots) to the R1C zone. The R1C zone permits a decreased minimum lot frontage compared to other R1-class zones, such as the R1A and R1B zones, and is intended to provide primarily for single-detached dwellings and accessory uses. The Subject Applications intend to operate within the permissions of the R1C zone, with the following adjustments to align with the Proposed Redevelopment:

- **The maximum number of units shall be 318** to align with the Proposed Redevelopment, where 318 lots are proposed to be zoned R1C.XX.X. For the time being, this maximum includes any accessory apartments and/or garden suites as there is servicing capacity has been determined on the basis of 446 units (refer to the Functional Servicing Report and Water and Wastewater Servicing Study summarized in Sections 5.7 and 5.12, respectively). Prohibiting additional residential units does not conflict with the Planning Act's requirements for allowing additional residential units, as the Site is not within an "area of settlement" as defined by the Planning Act. The Site is outside of an area in an official plan designated for urban uses (i.e., urban areas, hamlets, rural settlement areas, etc.). To permit accessory apartments and/or garden suites, additional work will be required to confirm sufficient servicing capacity.
- **Minimum Interior Side Yard Setback of 1.2 metres** – The base R1C zone permits a minimum interior side yard setback of 1.5 metres and Note Two (2) states that the minimum side yard may be reduced to 1.2 metres for a single storey dwelling. The

proposed reduction to 1.2 metres will ensure consistency across the Proposed Redevelopment as the R2 zone, applicable to the remaining 128 lots, permits a minimum side yard setback of 1.2 metres on one side. The proposed relief will allow for the inclusion of 2-car garages for all of the lots in the Proposed Redevelopment, which will create more liveable, desirable dwellings, which is appropriate where public transportation is not available.

- **Maximum Driveway Width of 61% of the area of the front yard** – The base R1C zone permits a maximum driveway width of 50% of the width and/or area of the front yard. The proposed relief will facilitate the inclusion of 2-car garages for all of the lots in the Proposed Redevelopment, which will create more liveable, desirable dwellings and appropriate where public transportation is not available. Sufficient space will still be made for landscaping and tree planting.

Table 3 - R1C.XX.X Zoning Compliance Table

Regulation	Required	Provided	Complies (Y/N)
Min. Lot Frontage	11.0 metres	11.58 metres	Y
Min. Lot Area	341.0 square metres	346.10 square metres	Y
Min. Lot Depth	26.0 metres	30.0 metres	Y
Max. Building Height	3.0 storeys but not greater than 11.0 metres	2.0 storeys are anticipated, but not greater than 11.0 metres	Y
Min. Exterior Side Yard	4.5 metres or in accordance with Section 4.34, except where a driveway crosses an exterior side lot line, the minimum setback to a garage shall be 6.0 metres	At least 4.5 metres or in accordance with Section 4.34, except where a driveway crosses an exterior side lot line, the minimum setback to a garage shall be 6.0 metres	Y

Min. Rear Yard	7.5 metres	At least 7.5 metres	Y
Min. Side Yard (1)(2)	1.5 metres	Minimum 1.2 metres	N
Max. Lot Coverage (3)(4)	40.0 percent	At least 40.0 percent	Y
Min. Landscaped Open Space	The Front Yard on any lot, excepting the Driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space. The driveway shall not constitute more than 50.0 percent of the width and/or area of the Front Yard	The Front Yard on any lot, excepting the Driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space. The driveway shall not constitute more than 61.0 percent of the width and/or area of the Front Yard	N (Requested Amendment)
Notes: (1) Where the dwelling does not include an attached garage, the minimum interior side yard on one side shall be 3.0 metres. (2) The minimum side yard may be reduced to 1.2 metres for a single storey dwelling. (3) The Maximum Lot Coverage includes accessory buildings. (4) The maximum lot coverage may be increased to 45 percent for a single storey dwelling.			

6.1.2 R2.XX.X Zone

The Subject Applications contemplate rezoning the 32' lots (128 lots) to the R2 zone. The Subject Applications intend to operate within the permissions of the R2 zone, with the following adjustments to align with the Proposed Redevelopment:

- **The maximum number of units shall be 128** to align with the Proposed Redevelopment, where 128 lots are proposed to be zoned R2.XX.X. For the time being, this maximum includes any accessory apartments and/or garden suites as there is servicing capacity has been determined on the basis of 446 units (refer to the Functional Servicing Report and Water and Wastewater Servicing Study summarized in Sections 5.7 and 5.12, respectively). Prohibiting additional residential units does not conflict with the Planning Act's requirements for allowing additional residential units, as the Site is not within an "area of settlement" as defined by the Planning Act. The Site is outside of an area in an official plan designated for urban uses (i.e., urban areas, hamlets, rural settlement areas, etc.). To permit accessory apartments and/or garden suites, additional work will be required to confirm sufficient servicing capacity.
- **Maximum Driveway Width of 61% of the area of the front yard** – The base R2 zone permits a maximum driveway width of 55% of the width and/or area of the front yard. The proposed relief will facilitate the inclusion of 2-car garages for all of the lots in the Proposed Redevelopment, which will create more liveable, desirable dwellings and appropriate where public transportation is not available. Sufficient space will still be made for landscaping and tree planting.

Table 4 – R2.XX.X Zoning Compliance Table (Small Lot Single Detached Dwelling)

Regulation	Required	Provided	Complies (Y/N)
Min. Lot Frontage	9.0 metres	9.75 metres	Y
Min. Lot Area	279.0 square metres	291.10 square metres	Y
Max. Building Height	3.0 storeys but no greater than 11.0 metres	2.0 storeys are anticipated, but not greater than 11.0 metres	Y

Min. Front Yard	6.0 metres or in accordance with Section 4.34, but 6.0 metres to the front face of a garage if the driveway crosses a front lot line	At least 6.0 metres	Y
Min. Exterior Side Yard	4.5 metres, but 6.0 metres to front face of a garage if the driveway crosses an exterior side lot line	At least 4.5 metres, but 6.0 metres to front face of a garage if the driveway crosses an exterior side lot line.	Y
Min. Side Yard (1)	1.2 metres on one side; 0.6 metres on the other side; 1.8 metres between dwellings on abutting lots	At least 1.2 metres on one side; 0.6 metres on the other side; and 1.8 metres between dwellings on abutting lots	Y
Min. Rear Yard	7.5 metres	At least 7.5 metres	Y
Max. Lot Coverage (2)	Not Applicable	Not Applicable	Y
Min. Landscaped Open Space	The Front Yard on any Lot, excepting the Driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space. The width of the driveway shall not exceed 55.0	The Front Yard on any Lot, excepting the Driveway shall be landscaped and no parking shall be permitted within this Landscaped Open Space. The width of the driveway shall not exceed 61.0	N (Requested Amendment)

	percent of the lot width, up to a maximum driveway width of 7.5 metres	percent of the lot width	
Garage/Driveway Width Restriction	The outside walls of an attached garage shall not exceed 55.0 percent of the lot width; and the driveway leading to the garage can be no more than the width of the exterior dimensions of the garage	The outside walls of an attached garage shall not exceed 61.0 percent of the lot width; and the driveway leading to the garage can be no more than the width of the exterior dimensions of the garage	N (Requested Amendment)
Notes: (1) Where the dwelling does not include an attached garage, the minimum interior side yard on one side shall be 3.0 metres. (2) Includes accessory buildings.			

6.2 SE Lands – Open Space & Wetland

Consistent with the 2023 Approvals, the central wetland area on the SE Lands will remain zoned Environmental Protection (EP). For open space lands surrounding the central wetland (Block 450) and other lands located on the southern edge of the subdivision on the SE Lands, the 2023 Approvals established Exception 15.30.4 with Zone Code OS.30.4. The Exception included permissions for infrastructure associated with residential development (i.e. roads, water-mains, wells, pumping station, stormwater pond, etc.). Through the proposed Zoning By-law Amendment, minor amendments are provided to Exception 15.30.4 to reflect the change from a common element condominium to a plan of subdivision, notably removing reference to a “common element” access road, as well as providing the legal descriptions of parcels to be serviced. The Exception is otherwise unchanged from the 2023 Approvals.

6.3 SE Lands – Parkette and Park

Through the proposed Zoning By-law Amendment, the one parkette and one park – Blocks 447 and 448, respectively – will be zoned OS, matching the proposed zone for the residential lots in the Proposed Redevelopment. Section 4.38.7 of Township Zoning By-law lists ‘public park’ as one of the uses that is permitted in all zones, however, the “OS” Zone will further restrict the permitted land uses. The 2023 Approvals did not include public parks.

6.4 NW Lands – Golf Course & Servicing Block

On the NW Lands, the 2023 Approvals established Exception 15.29.8 with Zone Code OS-GC.29.8. The Exception enabled servicing infrastructure to be located on the NW Lands to service the residential development on the SE Lands (i.e. water treatment facility, wastewater treatment facility). Through the Proposed Redevelopment, the NW Lands will continue to contain servicing facilities and the golf course; with the change to a plan of subdivision and anticipated public ownership of the servicing facilities, a dedicated servicing block has been created (Block 255). The proposed Zoning By-law Amendment contains lot regulations for the servicing block, as the base OS-GC zone permissions are intended to apply to much larger lots than Block 255 which therefore requires a site-specific approach.

To accommodate Block 255, a new access point is proposed along Wellington Road 19 to ensure efficient access to the servicing block that is separate from the entrances for the golf course and maintenance buildings, respectively. In total, there would be three access points to the NW Site from Wellington Road 19. The TIS, summarized in Section 5.10 of this Report, provides a description and analysis of the proposed accesses.

Exception 15.29.8 is proposed to be amended include the legal descriptions of the parcels for servicing consideration, rather than tied to the proposed zoning. Aside from the above-noted considerations, Exception 15.29.8 is unchanged from the 2023 approvals.

6.5 Draft Zoning By-law Amendment

The draft zoning by-law amendment is attached as **Appendix A – Draft Zoning By-law Amendment** of this Report.

7. Public Consultation Strategy

As part of the application package, the *Planning Act* requires a Public Consultation Strategy to outline opportunities for members of the public to be involved in the processing of the Subject Applications. The Applicant is proposing to utilize the public process provided in the *Planning Act*. In accordance with the *Planning Act*, the Township of Centre Wellington provides public notice of the applications in the prescribed manner and holds a Statutory Public Meeting as part of a regularly scheduled Council Meeting. Any individuals or property owners that request further notification regarding the applications would be formally notified by the Municipality as to the time and location when the Township of Centre Wellington Council will be considering the applications.

Opportunities to combine and/or supplement public engagement through a concurrent Environmental Assessment process related to the site servicing strategy will be explored through the circulation and review process of the Subject Applications.

8. Conclusion

In conclusion, the Subject Applications represent good planning and are consistent with the policy framework of the Planning Act, are consistent with the Provincial Planning Statement, and conforms to the County of Wellington Official Plan. The Proposed Redevelopment makes efficient use of lands already designated for residential and recreational purposes, integrating 446 single-detached dwellings with the Belwood Golf Club to create a recreation-based community. The plan preserves key natural features, provides active transportation connections, and incorporates a public park and a public parkette that ensure a livable community for future residents. A range of technical studies, summarized in Section 5.0 of this Report, have been completed which demonstrated that the Proposed Redevelopment is feasible, safe, and fiscally responsible. Overall, the redevelopment reflects orderly growth that is complementary to the surrounding area and contributing to the local housing supply in this unique recreation-based community. The requested site-specific provisions are appropriate and justified for the reasons contained in Section 6.0 of this Report.

Prepared by:

GSP Group Inc.



Richard Kelly-Ruetz, MCIP, RPP
Senior Planner



Hugh Handy, MCIP, RPP
Vice President



Dylan Schnurr, BES
Planner / Urban Designer

Appendix A – Draft Zoning By-law Amendment

The Corporation of the Township of Centre Wellington

By-law 2026-XX

A By-law to amend the Township of Centre Wellington Zoning By-law 2009-045, as amended, to change the zoning of the subject land from "R1A.30.5", "OS.30.4", "OS-GC.29.8" and "EP" to "R1C.XX.X", "R2.XX.X", "OS.30.4", "OS-GC.29.8", "OS" and "EP"

Whereas the Council of the Corporation of the Township of Centre Wellington deems it desirable to amend By-law No. 2009-045, as amended, pursuant to Section 34 of the Planning Act, R.S.O. 1990;

Now Therefore the Council of the Corporation of the Township of Centre Wellington hereby enacts as follows:

1. Schedule "A" Maps 29 and 30 to By-law No. 2009-045 are hereby amended in accordance with the attached Schedule "A" which forms part of this By-law.
2. Section 15 of By-law No. 2009-045, as amended, was further amended by By-law No. 2023-55, is hereby further amended by deleting the current exception OS-GC.29.8, and replacing it with the following:

15.29.8	OS-GC.29.8	Notwithstanding any other provision of this By-law to the contrary, on the lands zoned OS-GC.29.8, the following special provision shall apply: • In addition to the uses permitted by the OS-GC zone, infrastructure associated with the development on lands legally described as Parts of Lot 9 and 10, Concession 3, Geographic Township of West Garafraxa, and Part of Road Allowance Between Lots 9 and 10, Concession 3, Geographic Township of West Garafraxa, Township of Centre Wellington, County of Wellington, is permitted, including but not limited to a water treatment facility, wastewater treatment facility, and effluent disposal system, together with any installations, structures or accessory buildings appurtenant thereto including the provision of standby power. • Notwithstanding Section 9.4.2, Building Regulations shall not apply to a water treatment facility, wastewater treatment facility, and effluent disposal system, together with any installations, structures or accessory buildings appurtenant thereto including the provision of standby power. All other provisions of the OS-GC zone shall apply.
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3. Section 15 of By-law No. 2009-045, as amended, was further amended by By-law No. 2023-55, is hereby further amended by deleting the current exception OS.30.4 and replacing it with the following:

15.30.4	OS.30.4	Notwithstanding any other provision of this By-law, on lands zoned OS.30.4, in addition to the permitted uses of the OS Zone, the permitted uses shall include infrastructure associated with development on lands legally described as Parts of Lot 9 and 10, Concession 3, Geographic Township of West Garafraxa, and Part of Road Allowance Between Lots 9 and 10, Concession 3, Geographic Township of West Garafraxa, Township of Centre Wellington, County of Wellington, including but not limited to the installation or maintenance of a water-main, well, sanitary sewer main, storm sewer main, pumping station, gas main, pipeline, storm water management facility, lighting fixture, overhead or underground electrical services, cable television, telegraph or telephone line or associated tower or transformer, together with any installations or structures appurtenant thereto. Notwithstanding Section 9.1.2, Building Regulations shall not apply the installation or maintenance of a water-main, well, sanitary sewer main, storm sewer main, pumping station, gas main, pipeline, storm water management facility, lighting fixture, overhead or underground electrical services, cable television, telegraph or telephone line or associated tower or transformer, together with any installations or structures appurtenant thereto. All other provisions of the OS zone shall apply.
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4. Section 15 of By-law No. 2009-045, as amended, was further amended by By-law No. 2023-55, is hereby further amended by deleting the current exception R1A.30.5.
5. Section 15 of By-law No. 2009-045, as amended, was further amended by By-law No. 2023-55, is hereby further amended by adding the following new exceptions R1C.XX.X and R2.XX.X:

15.XX.X	R1C.XX.X	Notwithstanding any other provision of this By-law, to the contrary, on lands zoned R1C.XX.X, the following lot regulations shall apply: • The maximum number of units shall be 318. • Notwithstanding Section 4.1 of By-law No. 2009-045, as amended, Additional Residential Units are not permitted. <u>Lot Regulations:</u> a) Minimum Side Yard: 1.2 metres (3.9 feet)
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		b) Maximum Driveway Width: the outside walls of an attached garage shall not exceed 61% of the lot width; and the driveway leading to the garage can be no more than the width of the exterior dimensions of the garage. All other provisions of the R1C zone shall apply.
15.XX.X	R2.XX.X	Notwithstanding any other provision of this By-law, to the contrary, on lands zoned R2.XX.X, the following lot regulations shall apply: • The maximum number of units shall be 128. • Notwithstanding Section 4.1 of By-law No. 2009-045, as amended, Additional Residential Units are not permitted. <u>Lot Regulations:</u> a) Maximum Driveway Width: the outside walls of an attached garage shall not exceed 61% of the lot width; and the driveway leading to the garage can be no more than the width of the exterior dimensions of the garage. All other provisions of the R2 zone shall apply.

6. All other applicable provisions of By-law No. 2009-045 shall continue to apply to the lands affected by this amendment.
7. This By-law shall come into effect on the date of final enactment by the Council pursuant to Section 34 of the Planning Act, R.S.O., 1990.

Read a first, second and third time and finally passed this XX day of XXXX, 2026.

Mayor – Shawn Watters

Clerk – Tyler Sager

Township of Centre Wellington

Schedule "A"

By-law 2026-__

An Amendment to Township of Centre Wellington
Zoning By-law No. 2009-045 as amended

This is Schedule "A" to By-law 2026-__ passed this __th day of __, 2026.

