



PLANNING OPINION REPORT

Zoning Bylaw Amendment and Draft Plan of Subdivision Applications
7581 Nichol Road 15
Township of Centre Wellington

Prepared For:
Cachet Developments (Elora) Inc.



November 2025

MGP

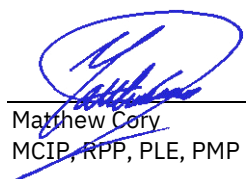
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Cachet Developments (Elora) Inc.
7581 Nichol Road 15
Township of Centre Wellington

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Contents

1.0	Planning Context.....	1
1.1	Introduction	1
1.2	Site Location and Characteristics.....	1
1.3	Surrounding Land Uses	2
1.4	Application & Site History	3
2.0	Development Considerations	4
2.1	Functional Servicing Report	4
2.2	Stormwater Management Report	5
2.3	Environmental Impact Study	6
	Transportation Impact Study	7
2.4	Preliminary Hydrogeological Assessment.....	9
2.5	Hydrogeological Summary Letter	10
2.6	Supplemental Groundwater Data	10
2.7	Fluvial Geomorphology Assessment and Erosion Mitigation Analysis.....	11
3.0	Proposed Development.....	12
3.1	Overview	12
4.0	Planning Policy Context.....	16
4.1	Planning Policy Considerations.....	16
4.1.1	<i>Growth Management.....</i>	<i>16</i>
4.1.2	<i>Complete Communities.....</i>	<i>19</i>
4.1.3	<i>Providing a Range and Mix of Housing.....</i>	<i>20</i>
4.1.4	<i>Natural Heritage Matters.....</i>	<i>23</i>
4.1.5	<i>Parkland Dedication Requirements.....</i>	<i>26</i>
4.2	Policy Analysis	28
4.2.1	<i>Provincial Planning Statement (2024).....</i>	<i>28</i>
4.2.2	<i>County of Wellington Official Plan</i>	<i>28</i>
4.2.3	<i>Township of Centre Wellington Official Plan (2024 Consolidation)</i>	<i>35</i>
4.2.4	<i>Township Of Centre Wellington Comprehensive Zoning By-Law No. 2009-045 (2022 Office Consolidation)</i>	<i>44</i>

5.0	Planning Opinion.....	47
5.1	Statement of Conformity with Policy Documents	47
5.2	Planning Act – Section 51(24)	47
5.3	Conclusion	52

List of Figures

Figure 1: Location of the Subject Lands	2
Figure 2: Excerpt of Draft Plan of Subdivision	15
Figure 3: Schedule C1: Sourcewater Protection.....	33
Figure 4: Schedule D - Mineral Aggregate Resource Overlay	34
Figure 5: Subject Lands as Currently Shown on Schedule A-1 - Land Use Plan	36

List of Tables

Table 1: Legal Description of the Subject Lands	2
Table 2: Proposed Development Statistics.....	13
Table 3: Population & Employment Density Estimate	14
Table 4: Pre- and Post-Development Housing Composition	22
Table 5: Parkland Dedication Calculation	26
Table 6: Multiple Residential Units Criteria	30
Table 7: General Development Policies	38
Table 8: Conformity with Section 51(24) of the Planning Act.....	47
Table 9: Upper Grand District School Board - Public Elementary Pupil Yield	55
Table 10: Upper Grand District School Board - Public Secondary Pupil Yield	55
Table 11: Wellington Catholic District School Board - Catholic Elementary Pupil Yield ..	55
Table 12: Wellington Catholic District School Board - Catholic Secondary Pupil Yield ...	55

Executive Summary

Malone Given Parsons Ltd. (“MGP”) represents Cachet Developments (Elora) Inc. (“Elora Sands”), owner of the property municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (“Subject Lands”). The Subject Lands are comprised of one (1) lot located south of Nichol Road 15, between Irvine Street and Gerrie Road, with an area measuring ~39.8 hectares (~98.4 acres).

The Subject Lands are currently subject to active official plan amendment applications to redesignate the property from ‘Prime Agricultural’ to ‘Primary Urban Centres’ and ‘Core Greenlands’ under the County of Wellington Official Plan (County File No.: OP-2025-06)/to ‘Residential’ and ‘Core Greenlands’ within the ‘Modified Urban Boundary’ under Township Official Plans, (Township File No.: OP003-2025). Through these amendments, it is expected that the Subject Lands will be included in the settlement area and appropriately designated to accommodate the proposed residential development. The proposed draft plan of subdivision and enabling zoning by-law amendment will implement the direction of the applicable Official Plans, as proposed to be amended. This report should be read in conjunction with the Planning Opinion Report prepared in support of the official plan amendment applications.

The Subject Lands are currently zoned Agricultural ‘A’ under the Township Zoning By-law (By-law 2009-045). In order to facilitate the Proposed Development, an enabling zoning by-law amendment is submitted as part of this application to rezone the Subject Lands to Residential Two (R2.52.5), Residential Three (R3.52.6/R3.52.7), Residential Four (R4.XX), Open Space (OS) and Environmental Protection (EP), which utilizes the majority of the zoning that was recently approved to the west (Clayton).

The proposed development supports a complete community by integrating a range of uses, including residential, open space, recreational areas, and infrastructure. The proposed development offers a well-balanced mix of locally appropriate housing types, including single-family homes, townhouses, and a future seniors' residence, providing diverse options to meet various housing needs.

The Draft Plan of Subdivision delivers a total of 591 residential units, consisting of 388 low-density (single detached) dwellings (66%) and 203 medium-density units (35%). A seniors' housing facility is also proposed on the Subject Lands, with further details on the form of development to be determined in the future.

The proposed Draft Plan includes a natural heritage block totalling 4.36 hectares to protect the natural heritage features that transect a portion of the Subject Lands. Two (2) park blocks with areas of 1.44 and 0.38 hectares, respectively, are proposed on either side of the NHS block. The Draft Plan also delivers a stormwater management solution comprised of three facilities south of Nichol Sideroad. This solution adopts a stormwater management scheme that will serve the Subject Lands and the Clayton Lands (which are approved for development through a settlement of an OLT appeal) west of Irvine Street,

also owned by Cachet, and the lands to the south known as 6574 Gerrie Road. This approach to stormwater management will provide an efficient stormwater management solution, ensuring optimal use of land and resources.

The proposed development is consistent with and complies with the appropriate Provincial, County (as proposed to be amended), and Local (as proposed to be amended) policies. The proposed subdivision aligns with provincial interest and the Province's mandate to deliver 1.5 million homes and will help to bring a range of housing units online. The proposed draft plan of subdivision also aligns with County and Local policy objectives outlined in the respective official plans. Technical investigations, including servicing, natural heritage, transportation, geotechnical, hydrogeological, and archaeological, have been completed, demonstrating the appropriateness of the proposed development.

The proposed draft plan of subdivision and the enabling zoning by-law amendment represent a well-coordinated and sustainable development approach that balances residential, recreational, and environmental considerations while optimizing land use and infrastructure. As demonstrated through our analysis within this report, it is our opinion that the proposed development is demonstrative of good planning, is in the public interest, and should be approved.

1.0

Planning Context

Cachet Developments (Elora) Inc. (“Elora Sands”) is proposing a Draft Plan of Subdivision and an enabling Zoning By-law Amendment to permit the development of the properties municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (the “Subject Lands”). This application is made subsequent to County and Township Official Plan amendments, which are intended to redesignate the Subject Lands to accommodate residential development. This section describes the Subject Lands and the surrounding land uses in this development context, and on the basis that the Official Plan Amendments are approved.

1.1 Introduction

Malone Given Parsons Ltd. represents Cachet Developments (Elora) Inc. (referred to hereafter as “Elora Sands”), the Owner of the property municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington (the “Subject Lands” or the “Lands”). Generally, the Subject Lands are located south of Nichol Road 15, between Irvine Street and Gerrie Road.

Following an application for Official Plan Amendments to the Township (File No. OP003-2025) and the County (File No. OP-2025-06), Elora Sands is proposing to develop the Subject Lands for residential uses, consisting of 591 residential units (388 low-density (single detached) dwellings, 203 medium-density units, and a future seniors housing facility (with an assumed unit total of ~100). A full description of the proposed development is detailed in this report.

This Report renders a planning opinion on the basis that the active applicable Official Plan Amendments are approved. These applications have not been approved as of the writing of this report.

1.2 Site Location and Characteristics

The Subject Lands are municipally known as 7581 Nichol Road 15 in the Township of Centre Wellington. Generally, the Subject Lands are located immediately South of Nichol Sideroad 15 and are bounded by Irvine Street (west) and Gerrie Street (east).

Figure 1 identifies the location of the Subject Lands, and Table 1 summarizes the legal

description of the Subject Lands.

Figure 1: Location of the Subject Lands



Table 1: Legal Description of the Subject Lands

Parcel No.	Party To	Legal Description	Area (ha)
1	ELORA SANDS DEVELOPMENT INC.	LT 16 CON 12 NICHOL EXCEPT PT 1 61R1012 & PT 1 61R4394; CENTRE WELLINGTON	39.84

1.3 Surrounding Land Uses

The following summarizes the surrounding land uses. For the purposes of the description below, Nichol Road 15 is assumed to be an east-west road.

- **North:** Agricultural and related uses. A woodland is located north of Nichol Road 15.
- **East:** Agricultural lands and related uses.
- **South:** Agricultural lands municipally known as 6574 Gerrie Road (which are also subject to Township File No. OP003-2025 and the County File No. OP-2025-06) referred to as the 'Keating Lands'. Established low-rise residential uses and an approved subdivision (known as the Ainley Subdivision) are located further south.
- **West:** Established low-rise residential uses and an approved residential

subdivision (on lands owned by Cachet Developments Inc. and referred to as the Clayton Subdivision).

1.4 Application & Site History

As part of the latest Municipal Comprehensive Review (“MCR”), the County undertook a Land Needs Assessment (“LNA”) to identify the quantum of additional lands to accommodate future growth. Elora Sands has been actively involved in this process and sought to have the Subject Lands included within the County’s delineated urban boundary. Based on the findings of the County’s LNA, additional urban lands were required to accommodate growth to 2051; however, the Subject Lands were not selected as part of the settlement expansion area and were therefore not redesignated to accommodate growth.

In response to the County LNA, MGP prepared a LNA which concluded that approximately 517 hectares of additional Community Area would be required for the County to meet growth demands through 2051. To accommodate this required growth, the MGP LNA suggested that Township of Centre Wellington would require approximately 351 hectares of additional land in the Township of Centre Wellington (based on the population growth projections).

On the basis of these findings, MGP, on behalf of Elora Sands, prepared and submitted an Official Plan Amendment for the Subject Lands. Those amendments are active and are currently under review by the Township (File OP003-2025) and County (File OP-2025-06). These applications are intended to redesignate the lands from ‘Prime Agricultural’ to ‘Primary Urban Centres’ and ‘Core Greenlands’ and to ‘Residential’ and ‘Core Greenlands’ within the ‘Modified Urban Boundary’ under the County and Township Official Plans, respectively.

The high-level planning rationale for these applications is as follows:

- Addressing Demonstrated Land Needs:
- Promoting Logical and Orderly Development:
- Supporting Compact, Multi-Modal Communities:
- Creating a Complete Community:
- Protecting Natural Heritage Systems (NHS):
- Delivering Community Benefits:
- Aligning with Settlement Expansion Criteria:

The Official Plan Amendments were submitted in coordination with the lands to the south of the Subject Lands (the Keating Lands). With these applications ongoing, our client now seeks to proceed with an application for a draft plan of subdivision and an enabling zoning by-law amendment for just their landholdings. This report, and the opinions rendered herein, are formulated on the basis that the active Official Plan Amendments will be approved as requested for the reasons detailed above and for all of the reasons provided in the various reports filed with those other applications.

2.0 Development Considerations

This section provides a brief overview of the accompanying technical studies for the proposed development. These reports are prepared in support of the proposed development and have been used to formulate the Planning Opinion in this report.

2.1 Functional Servicing Report

A Functional Servicing Report (FSR) was prepared by MTE, dated November 4th, 2025, in support of the Draft Plan and Zoning By-law Amendment applications. The purpose of the FSR is to present a servicing strategy for the proposed subdivision Draft Plan, which outlines how the subdivision can be developed with full municipal services, including sanitary sewage collection, domestic water, storm drainage, and utilities. In summary, the FSR concludes that:

- The roadworks and lot grading within the proposed development can generally be completed in accordance with the Township's standards.
- Adequate wastewater capacity exists in the Elora WWTP. The Subject Lands will be serviced by the existing Irvine Street trunk sanitary sewer, which outlets to the Colborne Street trunk sewer. The DC background study planned some upgrades to the Colbourne Street sewer west of Irvine Street. The proposed upgrades should be expanded to include Colbourne Street east of Irvine Street and the North Queen Street sewer.
- Under the peaked sanitary flow from the proposed development (combined gravity and SPS simultaneous peaked flow) minor surcharging may occur within a few generally flat sections of the Irvine Street sewer at Walser Street. This minor surcharging may be reduced or eliminated by timing the SPS discharge during non-peak periods. The Township should consider including upgrades to the Irvine Street sewer as part of the previously planned storm sewer upgrades and the DC background study update.
- A number of connection points to the proposed/planned extensions of the municipal watermain system are available to provide water supply for the proposed development. The Township's Engineer to confirm whether adequate pressure and flow are available and the sizing of proposed internal watermains. Watermains will be extended along Irvine Street (as part of the Clayton Subdivision) and SR15. The Township should consider including the SR15 watermain in the upcoming DC study update.
- Irvine Street is to be re-constructed with an urban cross-section in accordance with the Township's standards as part of the Clayton Subdivision. SR15 is to be

- re-constructed with half an urban cross-section as required for the grading and stormwater management strategy for the proposed development.
- Stormwater management for the development will provide the appropriate levels of quality, quantity, erosion, and water balance controls to meet the objectives of the NDSS, as outlined in the Preliminary Stormwater Management Report, dated November 2025.
- The proposed development can be adequately serviced through the extension of existing utilities, including hydro, gas, and telecommunications

2.2 Stormwater Management Report

A Preliminary Stormwater Management (SWM) Report was prepared by MTE, dated November 4th, 2025, in support of the Draft Plan and Zoning By-law Amendment applications. The purpose of the SWM Report is to develop a SWM strategy for the proposed development satisfying criteria established by the Township of Centre Wellington, the County of Wellington (County), the Grand River Conservation Authority (GRCA), and the Ministry of the Environment, Conservation and Parks (MECP – formerly MOE), taking into consideration the previous studies, municipal standards, and MECP guidelines in accordance with the recommendations of the NDSS.

In summary, the SWM Report finds that:

- The stormwater management strategy outlined within this report will provide the appropriate levels of quality, quantity, erosion, and water balance controls to meet the objectives of the Nichol Drain Subwatershed Study (Aquafor Beech Limited, October 2008).
- Enhanced quality control of stormwater runoff can be provided by the proposed stormwater management strategy through the implementation of SWMFs, which include a forebay and a wet pond cell.
- Quantity control targets for post-development peak flow rate attenuation to pre-development levels that are directed to the Nichol Drain can be achieved in the proposed SWMFs for all storm events up to and including the 100-year event.
- The erosion mitigation assessment completed indicates that instream erosion will not be exacerbated in the receiving Nichol Drain under post-development conditions.
- The SWMFs will be designed with measures to mitigate thermal impacts to the Nichol Drain.
- Infiltration (both active and passive) on the Subject Lands will provide an enhancement to the groundwater balance.
- The stormwater management strategy outlined within this report will provide an appropriate level of quality, quantity, and risk mitigation to adequately address the requirements of source water protection outlined in the Source Water Protection Due Diligence Review by Terra-Dynamics Inc

Based on these conclusions, the SWM Report recommends:

- Upon completion of detailed design, SWMFs will be constructed to provide control of stormwater as described in Sections 4.0 and 5.0 of this report.
- The preliminary design and modelling of the proposed stormwater management measures for the development should be reviewed and reconfirmed at the time of final design.
- Erosion and sediment controls will be implemented during construction as described in Section 9.0 of this report.
- A monitoring program should be updated for the Final SWM report at final design.

2.3 Environmental Impact Study

Beacon Environmental Limited prepared an Environmental Impact Study (EIS) dated November 6th, 2025. The purpose of this EIS is to describe the existing natural heritage conditions and features both on and immediately adjacent to the subject property; identify applicable environmental policies and evaluate project conformance with relevant provincial and municipal planning documents, and GRCA policies and regulations; identify potential development impacts to natural heritage features and ecological functions; and, identify appropriate mitigation measures to be implemented as the project moves forward. This EIS is specific to the Elora Sands Subject Lands in the context of the Draft Plan submission and is not inclusive of the Keating Lands.

Beacon undertook field investigations in the 2022, 2023, 2024, and 2025 field seasons as part of this study to characterize the natural heritage features and functions associated with the Subject Lands. A summary of field investigations is provided under Section 3.2 of the EIS. This work includes an ecological land classification and flora inventory, wetland feature staking by GRCA, breeding bird surveys, amphibian call surveys, aquatic habitat assessment, a bat habitat assessment, bat acoustic monitoring, a bat exit survey, and a chimney swift survey.

A natural heritage policy framework was reviewed in accordance with the PPS, County of Wellington Official Plan, Township of Centre Wellington Official Plan, Township of Centre Wellington Zoning By-law, as well as the GRCA regulations and the ESA and Fisheries Act. Through this work, Beacon concludes that the Subject Lands will incorporate the NHS and associated buffers consisting of a 10 m buffer applied to the wetland and a 15 m buffer applied to the Nichol Drain. The proposed development is to be confined to portions of the site that are in agricultural use and anthropogenic areas that are landscaped.

The EIS finds that the Nichol Drain and associated wetlands within the riparian corridor are located on the Elora Sands property. These natural features form the natural heritage system and will be protected through design and buffering from the proposed development.

With mitigation, potential impacts are limited to tree removal outside of woodland features and removal of Bobolink habitat. The EIS recommends mitigation measures, including the application of buffers and the development of restoration planting plans. General best practice mitigation measures, including timing windows and erosion and

sediment control, will be undertaken. With the implementation of the recommended mitigation, negative effects on the natural heritage system area are not anticipated, and enhancements to the natural heritage system on the subject property will be proposed as the project moves forward.

The EIS states that MECP will be consulted with respect to the requirements of the ESA, specifically as they relate to Bobolink and endangered bats, to ensure all aspects of the Act are addressed.

The EIS concludes that, with the implementation of the recommended mitigation measures, the proposed development plan demonstrates conformity and consistency with applicable natural heritage policies as set out in the PPS, County of Wellington OP, Township of Centre Wellington OP, and GRCA regulations.

Transportation Impact Study

Paradigm Transportation Solutions Limited conducted a Transportation Impact Study (TIS), dated August 2025. The TIS includes an analysis of existing traffic conditions, a description of the OPA Concept Plan (which includes both the Subject lands and the lands municipally known as 6574 Gerrie Road), traffic forecasts for five-year horizon (2035) from the assumed build-out, ten-year horizon (2040) from the assumed build-out, and any recommendations required to manage future traffic conditions.

With existing traffic conditions, the study area intersections were found to be operating within acceptable levels of service with no specific problem movements during the AM and PM peak hours. The residential development of the Subject Lands is forecast to generate approximately 378 and 502 trips during the AM and PM peak hours upon full build-out. With background trip generation, study area intersections are forecast to operate within acceptable levels of service under 2035 and 2040 background horizons with Geddes Street (Wellington Road 18) and James Street (from the 2035 background horizon) noted to have critical movements.

With total traffic considerations, the study area intersections are forecast to operate within acceptable levels of service under 2035 and 2040 background horizons with the following intersections noted to have critical movements:

- Geddes Street (Wellington Road 18) and James Street (from the 2035 total horizon);
- Woolwich Street/Nichol Road 15 and Irvine Street (from the 2035 total horizon);
- Colborne Street and Irvine Street (from the 2035 total horizon);
- East Mill Street (Wellington Road 18) and Irvine Street (from the 2035 total horizon); and
- Colborne Street and Gerrie Road (from the 2035 total horizon).

The TIS notes that the proposed municipal street connections to Irvine Street, Nichol Road 15, and Gerrie Road are forecast to operate within acceptable levels of service

during the AM and PM peak hours under 2035 and 2040 total traffic conditions.

The TIS recommends remedial measures, finding that traffic control signals are not warranted at the following intersections under 2035 and 2040 future traffic conditions:

- Geddes Street (Wellington Road 18) and James Street;
- Woolwich Street/Nichol Road 15 and Irvine Street;
- Colborne Street and Irvine Street;
- East Mill Street (Wellington Road 18) and Irvine Street;
- Colborne Street and Gerrie Road; and,
- Nichol Road 15 and Gerrie Road.

Left turn lanes are warranted at the following intersections

- Southbound on Geddes Street (Wellington Road 18) at James Street under future background and total traffic conditions;
- Westbound on Nichol Road 15 at Irvine Street under future background and total traffic conditions;
- Westbound on Nichol Road 15 at Gerrie Road under future background and total traffic conditions;
- Eastbound on East Mill Street (Wellington Road 18) at Irvine Street under total traffic conditions; and,
- Westbound on Nichol Road 15 at Street A under total traffic conditions.

Based on these findings, the TIS recommends that:

- 1) The road authority monitor operations of the following intersections to ensure appropriate traffic control to accommodate the future traffic demands:
 - Geddes Street (Wellington Road 18) and James Street;
 - Woolwich Street/Nichol Road 15 and Irvine Street;
 - Colborne Street and Irvine Street;
 - East Mill Street (Wellington Road 18) and Irvine Street; and
 - Nichol Road 15 and Gerrie Road.
- 2) Left-turn lanes are warranted at the following intersections:
 - Southbound on Geddes Street (Wellington Road 18) at James Street with 30 metres of storage upon the completion of the subject site;
 - Westbound on Nichol Road 15 at Irvine Street with 25 metres of storage upon the completion of the subject site;
 - Westbound on Nichol Road 15 at Gerrie Road with 15 metres of storage by the 2035 horizon year. Upon the completion of the subject site, the storage length should be extended to 25 metres;
 - Eastbound on East Mill Street (Wellington Road 18) at Irvine Street with 25 metres of storage upon the completion of the subject site;

2.4 Preliminary Hydrogeological Assessment

Soil-Mat Engineers & Consultants Ltd. prepared a Preliminary Hydrogeological Assessment, dated July 20, 2022, in support of the proposed applications on the Subject Lands. The purpose of the assessment was to provide detailed hydrogeological information to support site servicing options to support the assessment of site servicing options for the proposed development, from a geotechnical point of view. The study involved twenty-five boreholes, with ten on the Clayton Lands and fifteen on the Elora Sands, drilled between August 2021 and April 2022.

The soil conditions encountered on the Elora Sands generally consisted of a sandy silt/silty sand deposit in the upper levels with some areas and layers of clayey sandy silt till with depth. The soils encountered on the perimeter of the site were highly variable, often encountering layered deposits of clayey sandy silt till or sand. Occasional deposits of gravelly sand were encountered within some of the boreholes. The report notes that the presence of permeable granular deposits or 'veins' should be expected across the site.

The groundwater data gathered on the Elora Sands to date indicate a groundwater level on the order of 1.2 to 4.6 metres (elevations of between 408.5 to 410.7 metres) below the existing ground surface at Borehole Nos. 204, 205, and 206, predominantly located south of the landing strip within the farmer's field. The groundwater drops to the east towards a tributary of the Irvine Creek [also identified as Nichol Drain] with a groundwater elevation of between 402.8 to 404.2 metres measured manually periodically within Borehole No. 004 from August 2021 to June 2022. The groundwater level drops to the north as well towards Nichol Road 15, where the stormwater management pond is proposed. The Investigation recommends that it would be prudent to advance a series of test pits or additional boreholes across the site, specifically in the areas of notably higher groundwater levels and areas of large excavations for deeper services or pumping stations, in order to assess how the groundwater will affect the excavations during site earthworks and servicing. As noted in the Hydrogeological Summary Letter (dated September 22, 2025), additional groundwater monitoring wells (2) were installed on February 24th and May 13th 2025. Refer to Section 2.5 for more details.

Relating to hydrogeological considerations, excavations for the proposed development services are expected to extend 2 to 5 metres below the surface, while excavations for foundations would be expected to extend up to approximately 1.5 to 2 metres. Excavations for the proposed basement levels should be well above the groundwater level, pending review of the final site grading plans and foundation depths, along with more detailed assessments such as test pits in the area of observed shallow groundwater levels. The report recommends that final grading of the site should appropriately consider the groundwater levels in order to minimize or avoid conflict or impact to the groundwater during pre- and post-construction. In this regard, the grading and stormwater management plan should accommodate surface runoff that follows the existing overall drainage patterns as much as possible.

The report further states that it is not anticipated that the proposed construction will have an adverse impact on the groundwater condition in the area, provided the comments and recommendations are adhered to. There is not expected to be a significant or long-term impact on the development (such as ongoing dewatering, etc.) provided the discussion and recommendations of the report are considered in the site grading, servicing and stormwater design. The report also states that the hydrogeological setting of the site is such that potable wells in the area would be drawing from a deep confined bedrock aquifer, and would be largely unaffected by potential construction activities encountering the shallow near-surface groundwater regime.

The Investigation concludes that the subsurface descriptions and borehole information are intended to describe conditions at the borehole locations only. It is the contractors' responsibility to determine how these conditions will affect the scheduling and methods of construction for the project.

2.5 Hydrogeological Summary Letter

Soil-Mat Engineers and Consultants (Soil-Mat) prepared a Hydrogeological Summary Letter in support of the proposed development, dated September 22, 2025. Based on observations during drilling, that letter finds that the static groundwater level is conservatively estimated at depths of perhaps 2 to 5 metres below the existing ground surface, at elevations of approximately 403 to 410 at Clayton Lands. It was noted that the measured groundwater level generally followed the contours of the ground surface elevations. Regardless, based on the observed water conditions in the boreholes, shallower 'perched' deposits should be anticipated, especially during the 'wet' times of the year.

The Soil-Mat Letter recommends that foundation levels for the townhouse or single-family units should be designed to allow for a minimum separation of 0.3 metres between the seasonal high groundwater elevation and the founding elevation. Where the separation is less it may be necessary to raise the founding level or adjust the grade to allow for adequate separation. The attached Drawing No. 2 titled 'Groundwater Contour Plan' (appended to the Soil-Mat letter), illustrates the approximate groundwater contours based on linear interpolation of the measurements taken at the groundwater monitoring wells.

2.6 Supplemental Groundwater Data

Soil-Mat Engineers and Consultants (Soil-Mat) prepared a letter titled Supplementary Groundwater Data dated September 2025. This letter is intended as a brief updated groundwater level summary based on information collected between February 24, 2025 to May 13, 2025.

The Soil-Mat letter concludes that water level readings are noted to be reasonably consistent between May 2023 and May 2025, indicative of the seasonal high groundwater levels. On this basis, Soil Mat finds that the previously prepared groundwater contour plan

for the site would be considered valid. This has been appended for reference. It is noted that continuous collection of groundwater data in each of the monitoring wells is ongoing. This information will be updated in late 2025, or sooner as may be warranted.

2.7 Fluvial Geomorphology Assessment and Erosion Mitigation Analysis

GEO Morphix Ltd. (GEO Morphix) prepared a Fluvial Geomorphology Assessment and Erosion Mitigation Analysis, dated October 31st, 2025, in support of the proposed development. The purpose of that study is to assess watercourse characterization and delineation of erosion hazards. The report also summarizes erosion mitigation targets to address stormwater management requirements for the Nichol Drain.

The GEO Morphix assessment summarizes that the previously completed Nichol Drain Subwatershed Study (Aquafor Beech, 2008) was reviewed along with surficial geology and physiography mapping and an historical assessment with imagery ranging from 1930 to present to understand existing and historical site conditions. Based on the desktop assessment the land use within the Nichol Drain was straightened prior to 1930 and has since been maintained as a municipal drain, restricting lateral channel migration. The subject lands have remained agricultural throughout the time frame reviewed. Field investigations were completed to characterize watercourse conditions and inform the erosion hazard delineation and erosion mitigation analysis.

An erosion hazard assessment was also completed for the reaches along the Nichol Drain. Within the Subject Lands, it was determined that Reach R2a and R2b (as identified in the GEO Morphix assessment) flow within an unconfined floodplain, requiring meander belt width delineations to address the erosion hazard following MNR (2002) guidelines. Meander belt widths were calculated using empirical modelling due to the historical channel modifications (i.e., absence of natural meanders). The resulting meander belt width of 43 m was recommended for both Reach R2a and R2b.

Results from the erosion exceedance modelling demonstrate that the proposed SWM strategy is expected to effectively mitigate against increases in erosion potential along Reach R1a and R2a. Under post-development conditions, negligible changes in erosion potential were exhibited for both reaches in the analysis. Slight reductions in cumulative effective work and effective volume, combined with systematically lower peak flows, suggest that the proposed stormwater management measures will maintain or marginally reduce existing patterns and rates of erosion within the receiving watercourse.

3.0 Proposed Development

This section summarizes and describes the proposed development, which comprises 388 single detached units, 203 townhouse units, a seniors housing block, two (2) Park blocks totalling 1.81 ha, three (3) Storm Water Management blocks totaling 4.53 ha, a pumping station totaling 0.32 ha, and associated local roads/public rights-of-way with widths of 18.0 metres.

3.1 Overview

The Subject Lands are proposed to be developed with residential uses in order to deliver a range and mix of housing options. The development (hereafter the “Proposed Development” or the “Development”) is comprised of 388 single-detached dwellings (100 of which will have frontages of 12.2 metres, and 288 will have frontages of 10.0 metres), 176 street-townhouse dwellings, and 27 rear access townhouse dwellings. A 1.35-hectare seniors housing block is also proposed on the eastern side of the Subject Lands, immediately west of Gerrie Road. Generally, higher-density housing forms are proposed adjacent to Irvine Street in the form of townhouse dwellings, transitioning to single-detached housing forms toward the centre of the Proposed Development.

The Proposed Development implements a modified grid pattern, with adjustments to accommodate site constraints where required. On the western portion of the Subject Lands, Street ‘A’ provides access via Nichol Sideroad 15 to the north and provides access to the future developable lands to the south. Street ‘B’, running in the east/west direction, provides access to this portion of the Subject Lands via Irvine Street. This access is aligned with the approved access to the Clayton Subdivision (File No. 23T-22005/ZBA RZ14-2002), located on the west side of Irvine Street. The Townhouse dwellings located between Street ‘D’ and Irvine Street, as well as the single-detached units located between Street ‘H’, will have frontages along the local road network within the proposed development so as to limit direct access onto collector roads.

The eastern side of the Subject Lands is accessible via Street ‘C’ with connections on Nichol Sideroad 15 to the north and Gerrie Road to the east. Street ‘H’ is proposed as a window street on Nichol Sideroad 15.

The Subject Lands are generally divided by a 4.36-hectare NHS block, which is intended to maintain and protect the natural heritage system on the Subject Lands. Three (3) stormwater management blocks are proposed on the Subject Lands in proximity to the NHS block. This includes two stormwater management blocks west of the NHS block, of

1.69 and 1.88 hectares respectively (collectively referred to in the MTE reports as SWMF1), and one stormwater management 0.96-hectare block, located east of the NHS block.

Two (2) Park Blocks are proposed on either side of the proposed NHS block to optimize access to community spaces. The western park block (identified as Block 423) totals 1.44 hectares and is co-located with the proposed NHS block. The eastern park (identified as Block 424) is 0.37 hectares in area and has frontage on both Nichol Sideroad 15 and Street 'C'. This block is strategically located next to a 0.96-hectare SWM block. A pumping station is proposed south of the Park Block.

The proposed draft plan of subdivision has also been designed with regard to the orderly future development of adjacent lands. In particular, the development proposes two (2) road stubs (Street 'A' and Street 'E') to facilitate future connectivity with the lands to the south (the Keating Lands) that are also proposed to be redesignated as part of Township File No. OP003-2025 and the County File No. OP-2025-06. This approach ensures that the Proposed Development can function independently today while also supporting coordinated growth in the future. By planning for these connections now, the subdivision avoids precluding development to the south and allows for the seamless extension of the community in a manner that is efficient, compatible, and consistent with the Township's long-term growth objectives.

Table 2 provides a breakdown of the proposed uses and the associated areas for these uses.

Table 2: Proposed Development Statistics

Lot/Block No.	Land Use	Units	Area (ha)
1-388	Single Detached 12.2m Lots 10.0m Lots	100 288	14.89
389-417	Street Townhouses 6.10m Lots	176	3.98
415-422	Rear Access Towns 6.10m Lots	27	0.78
423-424	Park		1.81
425	Natural Heritage System		4.36
426-428	Storm Water Management		4.53
429	Pumping Station		0.32
430	Servicing Block		0.04
431	Seniors Block	100	1.37
432-433	Future Road		0.03
Roads	Streets A-J 18.0m R.O.W. - 4,013m		7.73
TOTALS		691	39.84

Table 3 provides an estimated population generated through the Proposed Development.

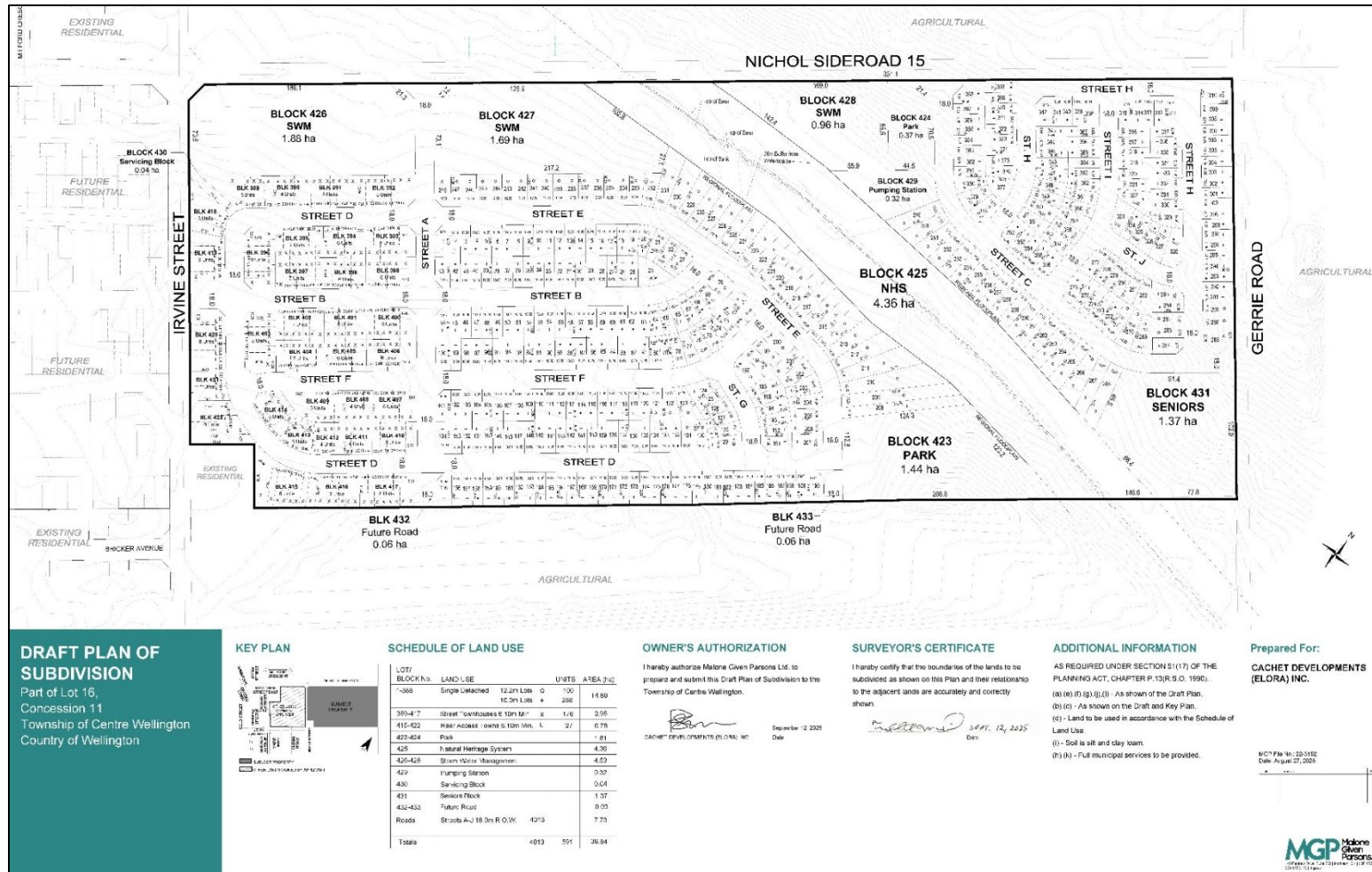
Table 3: Population & Employment Density Estimate

Residential Calculation			
Unit Type	Low and Medium Density Population Yield		
	Unit Count	PPU	Population
Low Density	388	3.065	1,189.2
Medium Density	203	2.314	469.8
Total			1,659
Unit Type	Seniors Housing Population Yield		
	Units	PPU	Population
Seniors Housing	100 (75 units/ha x 1.37 ha)	2.314 (Medium Density PPU)	231
Total			231
Total Residential Yield			1,890
Employment Calculation			
Unit Type	Employment Yield		
	Total Population	% of Area	Jobs
Work-From-Home	1,890	4%	76
Total			76
Total (persons and jobs)			1,966
Area (Net Developable Area)			35.48
Density (persons and jobs per ha)			55

*PPUs retrieved from the 2022 Development Charges Background Study for the County of Wellington, prepared by Watson & Associates Economists Ltd.

**Population rounded to the nearest round number.

Figure 2: Excerpt of Draft Plan of Subdivision



4.0 Planning Policy Context

This section of the report addresses applicable Provincial, County, and Township planning policies as they apply to the Subject Lands and the proposed development. This section assumes that the Subject Lands will be redesignated to bring the lands within the settlement area boundary with an urban designation through the concurrent amendments to the applicable Official Plans. On this basis, pertinent policies addressed herein relate to growth management, complete communities, range and mix of housing, parkland dedication requirements, and the natural heritage system.

4.1 Planning Policy Considerations

This section analyzes the consistency and conformity of the proposed development with regard to major planning matters and the related policies that require specific attention and explanation when considering the proposed development. These policy considerations are assessed on the basis that the active Official Plan Amendments for the Subject Lands will be approved. While the Subject Lands are not currently within the settlement area boundary, active applications at both the Township and County levels seek to redesignate the lands for urban purposes. Accordingly, the policy review and planning analysis that follows has been prepared on the reasonable assumption that these Official Plan Amendments will be approved, thereby bringing the Subject Lands into the settlement area boundary and assigning them an urban designation.

The specific considerations detailed below include growth management, building complete communities, providing a range and mix of housing, parkland dedication, and the protection of the natural heritage system. The applicable policies within Provincial, County, and Township planning documents have been reviewed, and we have concluded that the proposed development is consistent with or conforms to these policies. Further analysis, discussion, and planning opinions are provided in the following sections of this report.

4.1.1 Growth Management

The Provincial Planning Statement (PPS) 2024 provides high-level policy direction on matters related to growth and growth management in the province of Ontario. The PPS sets out Ontario's goal of achieving at least 1.5 million homes built by 2031.

Pending approval of the active OPAs, the Subject Lands will be located within the settlement area. Under the PPS 2024, settlement areas are to be *"the focus of growth and development"* (Policy 2.3.1.1) and are to be based on densities and a mix of land uses

that efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, and support active transportation, among other factors (Policy 2.3.1.2).

It is our opinion that the Proposed Development efficiently uses lands and resources by implementing a locally appropriate compact built form that will optimize existing infrastructure. The Proposed Development has regard for the surrounding lands, which are also proposed to be brought into the settlement area, so as to facilitate a logical and contiguous continuation of growth.

Under the PPS, planning authorities shall (Policy 2.1.4):

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans”.*

In accordance with the policies of the PPS 2024, the Subject Lands are expected to be appropriately designated to accommodate future growth and will thereby contribute to the municipality’s ability to accommodate residential growth, as required by the PPS.

Corresponding with the direction of the PPS, the County Official Plan similarly directs that the majority of growth will be directed to primary urban centres that offer municipal water services and municipal sewage services (Policy 3.1.1). In accordance with this direction, the Proposed Development will direct growth to a primary settlement area, subject to the approval of the active OPAs, and on lands that can be serviced with minimal extensions to existing infrastructure.

Section 3.4 ‘Guiding Growth’ under the Wellington County Official Plan sets out general objectives for growth. These objectives generally include encouraging efficient cost-effective development patterns; taking advantage of capacities in existing and planned water, wastewater, utilities, and transportation systems; supporting the achievement of complete communities through a more compact built form; and encouraging more efficient use of land through increased densities in designated greenfield areas, among other matters. In accordance with this direction, the Proposed Development efficiently uses land and resources by promoting a compact built form and a variety of housing typologies of varying densities that will optimize existing infrastructure and servicing, promote opportunities for active transportation, among other matters.

The Wellington County Official Plan anticipates that the County will grow from approximately 100,800 people in 2021 to approximately 160,000 by the 2051 planning horizon, requiring new housing, commerce, employment, and services for roughly 59,000 additional residents. In October 2024, in concert with the release of the PPS 2024, the

Ministry of Finance issued updated population projections that increase the County's forecasted growth by approximately 15,800 people. While further projections were released in August 2025, our revised analysis continues to rely on the October 2024 forecasts, which represent an appropriate and reliable basis for long-term planning. These forecasts are issued annually and fluctuate from year to year; however, they should not be adjusted on an annual basis for the purposes of long-range land use planning. The most recent reduction reflects a short-term adjustment tied to lower immigration levels, but immigration is expected to rebound given its critical role in supporting population and economic growth. Accordingly, the October 2024 projections provide a sound basis for assessing long-term land needs in Wellington County. The development of the Subject Lands through the proposed draft plan of subdivision will contribute to the achievement of these growth targets/forecasts.

The allocation of growth is detailed under Section 3.5 of the County Official Plan. The location of growth is to be determined by market forces, available land and services, and planning policies. The allocation of growth is depicted in Table 1 of the Official Plan, and the allocation to local municipalities is shown in Table 2 of that plan, including the anticipated growth allocated to the Township of Centre Wellington.

As described above, we note that despite the total population for Centre Wellington shown below, this is based on the Growth Plan targets. Utilizing the 2024 Ministry of Finance population projections, it is anticipated that the total population will increase from 58,200 to 65,000 people in Centre Wellington.

The Proposed Development will contribute to the County's growth targets by facilitating the delivery of 591 units and a seniors housing block (~100 units) equating to 1,966 persons and jobs (See section 3.1 of this report).

The County of Wellington Official Plan and the Centre Wellington Official Plan set out specific growth targets for growth in greenfield areas. The Official Plan states that the County will be planned to achieve an overall minimum density of not less than 40 residents and jobs per hectare (Section 3.3.1 of the County Official Plan/ Policy C.5.6.2.i of the Township Official Plan). In response to this direction, the Proposed Development will achieve a minimum density of 55 residents and jobs per hectare (excluding lands for the natural heritage system), which exceeds the County's minimum density target set out in Section 3.3.1 of the Official Plan. Section 4.4.4 encourages the introduction of medium-density housing types in new subdivisions and other designated greenfield areas. In alignment with Section 3.3.1, the proposed development sets out to deliver a range of housing types, including medium-density dwellings.

The Wellington County Official Plan includes a specific servicing policy under Section 3.4, which directs that growth should be located where full municipal water and wastewater services are available, encouraging an efficient, environmentally sound use of land. Where full services are not feasible, municipalities may choose to use private communal sewage services and private communal water services, or on-site servicing options, but only for lower-intensity uses or in limited service areas. In line with this policy, the

Proposed Development will be serviced by full municipal services. Moreover, the Functional Servicing and Stormwater Management Report prepared in support of the applications confirms that municipal servicing (water, sanitary, and stormwater) can be extended to the Subject Lands in a manner that is both technically feasible and financially responsible, utilizing existing infrastructure and minimizing environmental impacts. This ensures that the proposal fully conforms with Section 3.4 by locating growth where services can be efficiently provided and preserving the policies' intent to direct growth to urban areas with municipal services.

In summary, the Proposed Development implements a scale and density that will contribute towards the minimum density targets detailed in the County and Township Official Plans and adjusted to reflect MOF projections. The Proposed Development will optimize land and resource use while delivering context-appropriate housing that has regard for the existing built forms in Elora-Salem. Based on the above, it is our opinion that the proposed development is consistent with the PPS and conforms to the County of Wellington Official Plan and the Township of Centre Wellington Official Plan on matters of growth management.

4.1.2 Complete Communities

The PPS 2024 sets out policy direction for the achievement of complete communities. The definition of the Complete Communities under the PPS is as follows:

“means places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations” [emphasis added].

Under Section 2.1.6 of the PPS 2024, planning authorities should support the achievement of complete communities by:

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

The Wellington County Official Plan describes complete communities as those which:

provide a diverse mix of land uses; provide a diverse range and mix of housing options; expand convenient access to a range of transportation options, public service facilities, open spaces, recreational facilities, and healthy, local, and affordable food options; provide for more compact built form and a vibrant public realm; and, are age friendly (Policy 2.1.5). Section 3.3 further encourages the efficient use of land through higher densities in designated greenfield areas of primary and secondary urban centres.

The Proposed Development addresses these policies by delivering a range and mix of community and residential uses that will serve people of all ages and abilities. The draft plan includes varied housing forms, including low- and medium-density units as well as a seniors' housing block, broadening housing choice and improving affordability. These housing options will accommodate both younger households seeking attainable entry housing and older adults seeking age-appropriate forms, ensuring intergenerational opportunities within the community.

The plan also integrates community amenities that support active and healthy living. Pedestrian-oriented design elements, such as trails, sidewalks, and a connected park system, enhance walkability and promote social interaction. The distribution of parks and open spaces, integrated with the natural heritage system, ensures residents have access to both active and passive recreation opportunities within the neighbourhood. These elements support the PPS and County objectives of fostering compact built form, a vibrant public realm, and opportunities for recreation and interaction.

Finally, the Subject Lands are located adjacent to the existing settlement area of Elora/Salem, allowing the Proposed Development to dovetail with established community services, schools, commercial uses, and institutional facilities already in place. This ensures residents will have convenient access to daily needs, reducing reliance on the automobile and reinforcing broader regional objectives for complete, sustainable communities.

In our opinion, the Proposed Development is consistent with the PPS 2024 and conforms to the County OP policies for complete communities and represents good planning that is in the public interest.

4.1.3 Providing a Range and Mix of Housing

The PPS 2024 articulates that *“Ontario will increase the supply and mix of housing options, addressing the full range of housing affordability needs”* and that *“[e]very community will build homes that respond to changing market needs and local demand”* and provide *“a sufficient supply with the necessary mix of housing options will support a diverse and growing population and workforce, now and for many years to come”*.

Section 2.2 of the PPS specifically addresses housing matters, stating that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet the projected needs of current and future residents of the regional market area by:

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

Similarly, Section 3.3.1 of the County of Wellington Official Plan emphasizes the importance of providing affordable housing options to meet the needs of residents. The Plan states that the County is committed to ensuring that a range of affordable housing options is available to low- and moderate-income households.

Policy 8.1.3 a) of the County Official Plan states that single-detached dwellings are currently the dominant housing type in the Urban Centres designation. While this is expected to continue, the Plan also states that new housing types are needed to provide a greater variety of residential accommodations as well as a more affordable housing supply (Section 8.3.1). The Official Plan contemplates that this variety in dwelling types, consisting of semi-detached, townhouse, and apartment dwellings will be implemented in response to housing need and that these units may eventually account for at least one-quarter of all housing units in most Urban Centres (Section 8.3.1). The Township's Official Plan echoes this sentiment and articulates a desire to encourage the production of a wide range of housing types to meet future housing needs. The Township Official Plan states that Council *shall* provide for the opportunity, through subdivision approval and zoning bylaw approvals, for a variety of housing types to be provided (Policy C.5.1). Within Greenfield areas, the Township will encourage increased densities, a broader mix of housing, and will encourage the introduction of medium density housing types in new subdivisions and other Greenfield areas (Policy C.5.6.3).

The Proposed Development aligns with the policy direction of the PPS 2024, the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan by

delivering a diverse range of housing types and densities that respond to both local demand and regional housing needs. This mix ensures an efficient use of land and infrastructure while addressing the need for a compact, sustainable development pattern. The proposed development introduces medium-density housing, such as townhouses, to diversify the housing stock and provide more affordable options for current and future residents. This mix ensures an efficient use of land and infrastructure while addressing the need for a compact, sustainable development pattern. Furthermore, the inclusion of a seniors' residence responds to demographic trends and provides housing options for individuals of all ages and abilities.

The proposed development also supports the PPS's emphasis on transit-supportive development and active transportation. By integrating a range of densities and compact urban design, the plan facilitates walkability and efficient connectivity to existing and planned transit networks. This approach not only aligns with the Township's Official Plan but also ensures that the development contributes to broader sustainability objectives, such as reducing car dependency, among others.

The proposed housing mix also supports PPS policies promoting compact development, efficient use of land, and active transportation. Townhouses and smaller-lot singles contribute to a more land-efficient form of growth, while the seniors' housing block introduces a specialized housing option not currently prevalent in the community. Together, these elements help ensure that the Proposed Development serves households of varying ages, incomes, and abilities.

As demonstrated in the Table below, single-detached dwellings make up the dominant housing type in the Elora/Salem Population Centre (Population Centre 0278), equating to approximately 66% of all housing types according to 2021 Census data. With the introduction of the Proposed Development, a greater diversity of housing types will be introduced into this population centre, namely in the form of medium-density dwellings (townhouses) that provide an alternative to the current dominant housing types in the surrounding area. Based on the table below, it is our opinion that the direction of the Township's Official Plan is met in maintaining single-detached dwellings as the dominant housing type while adding to the range of housing options and a compact form of future development in the form of townhouses.

Table 4: Pre- and Post-Development Housing Composition

Population Centre 0278				
Dwelling Type	Pre-development		Post-development	
	Count	Percentage	Count	Percentage
Single-detached house	6,175	65.7%	6,563	65.1%
Semi-detached house	530	5.6%	530	5.3%
Row house	871	9.3%	1,074	10.7%
Apartment or a flat in a duplex	160	1.7%	160	1.6%
Apartment (<5 storeys)	1,530	16.3%	1,630	16.2%
Apartment (>5 storeys)	110	1.2%	110	1.1%
Other single-attached house	10	0.1%	10	0.1%
Mobile dwelling	10	0.1%	10	0.1%

Total	9,396	100%	10,087	100%
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**Pre-development numbers were retrieved from Statistics Canada (2021). These numbers have been adjusted to include the Clayton Subdivision located west of the Subject Lands*

***Seniors housing (approx. 100 units in total) were included within the Apartment <5 storeys.*

The proposed development features housing options that are appropriate within the context of the Subject Lands and the surrounding community, including single detached dwellings with frontages of 10.0 and 12.2 metres. It is our opinion that the proposed housing composition is contextually appropriate and achieves an appropriate density in alignment with the character of the surrounding community while injecting townhouse units and increasing the overall proportion within the community.

It is our opinion that this development conforms with the housing policies of the PPS by providing context-appropriate housing stock to help meet the needs of current and future residents within Ontario and is consistent with the housing policies of the PPS and conforms to the policies of the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan on matters of housing.

4.1.4 Natural Heritage Matters

The PPS 2024 also provides policy direction on matters of natural heritage features and systems. Section 4.1.1 states that *“[n]atural features and areas shall be protected for the long term,” while Section 4.1.2 emphasizes that “the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved.”* These policies establish the framework for preserving and enhancing natural systems within the development context.

Section 4.1.8 of the PPS states that *“development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions”*. The Proposed Development protects the natural heritage system by preserving an NHS block in accordance with the recommendations of the EIS prepared by Beacon. The EIS characterizes the existing natural heritage features of the Subject Lands and addresses the potential impacts of the proposed development on the natural heritage features and functions on and immediately adjacent thereto. The report also includes several mitigation measures to ensure that natural heritage features and functions are properly addressed.

A portion of the Subject Lands are designated as part of the County’s Greenland System, as shown on Schedule ‘B1’. The Greenlands System is intended to include those features and areas which are part of Wellington’s natural heritage or areas in which natural or human-made conditions may pose a threat to public safety.

Corresponding with the County Official Plan, Township Official Plan articulates that Core Greenlands form a part of the Natural Heritage Designation, which are encouraged to be

protected and enhanced (as described in Section C.3.1). When planning for the future of Centre Wellington, the Township will give consideration to the protection, preservation, and enhancement of significant natural features, including those that are designated 'Core Greenlands'. Core Greenlands are "*a composite of provincially significant wetlands, the habitat of endangered or threatened species, and floodways and hazardous lands*". Development or site alteration within Provincially Significant Wetlands, the habitat of threatened or endangered species, and floodways is prohibited under the Township Plan. In accordance with this direction, no development is proposed within this block.

The Proposed Development has been designed to respect and protect the natural heritage features on the Subject Lands in accordance with the PPS 2024, the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan. An Environmental Impact Study (EIS) prepared by Beacon Environmental identified and evaluated the natural heritage system on the Subject Lands and adjacent areas. The findings of the EIS established the limits of the NHS, recommended appropriate buffers, and outlined mitigation measures to eliminate impacts on ecological functions.

In direct response to these findings, the draft plan incorporates a 4.36-hectare Natural Heritage System block, designated for long-term protection. Development has been directed away from these lands, with appropriate setbacks and buffers applied to all natural heritage features. Stormwater management facilities have been co-located and designed to function with the NHS, minimizing potential impacts.

A portion of the Subject Lands also falls within the County's Greenlands System and the Township's Core Greenlands designation. Consistent with these policies, the plan protects these features in their entirety, prohibits development within them, and incorporates opportunities for enhancement through buffering and enhancement.

Section 8.9.3 of the County Official Plan, which speaks to the Core Greenlands and Greenlands designations on Schedule B, defers to Section 5.6 for specific policies related to development control (Section 8.9.3). Under Section 5.6, it is stated that development and site alteration shall not be permitted within Provincially Significant Wetlands or in significant habitat of threatened or endangered species, except in accordance with provincial and federal requirements. In other Core Greenlands areas, and in Greenlands areas, permitted uses and activities may include agriculture, existing uses, conservation, forestry, aggregate extraction, open space, and passive recreation. The County Official Plan states that the defined uses may only be permitted if there are no negative impacts on significant features and functions and no significant negative impacts on other Greenland features and functions; if the hazardous lands policies of Section 5.4.3 are met; and if the development conforms to policies of the applicable adjacent or underlying designation (Section 5.6.2).

The NHS has been identified on the Subject Lands through the EIS prepared by Beacon Environmental. Features of the NHS include the Nichol Drain traversing the Elora Sands subject property, the surrounding wetland communities and the floodplain limit. These features are included in the County's Greenlands System and will be protected with a 10

m buffer to the wetland communities, a 15 m buffer to the Nichol Drain and the outer floodplain limits. The EIS articulates that these buffers will be restored to bolster the NHS and are of a sufficient width to protect and enhance the natural heritage systems and its functions.

Under the Township Official Plan, the Natural Heritage and Core Greenlands policies are set out in Sections C.3 and D.8, respectively. These policies generally encourage the protection and enhancement of the natural heritage within the Township. Following the approval of the active Official Plan Amendment, the Subject Lands will be partially subject to the Core Greenlands System overlay.

Permitted uses under the Core Greenlands system are described under Section D.8.2. These uses are limited to conservation and resource management, open space and passive recreation. The Plan states that these uses shall only be permitted where there are no negative impacts on provincially significant features and functions and no significant negative impacts on other natural heritage features and functions; where any natural hazards present can safely be overcome; and, where the development conforms to policies of the applicable adjacent or underlying designation. In accordance with this direction, the Proposed Development will establish an NHS block for the protection of natural heritage features on the Subject Lands with opportunities for passive recreation, where feasible. The establishment of this block is supported by the EIS submitted as part of this application.

Section D.8.2 of the Township Official Plan provides additional direction for the implementation of the Core Greenlands System. Under that section, Core Greenlands are to be placed in a restrictive zone that prohibits buildings, structures and site alterations except as may be necessary for the management or maintenance of the natural environment. Through this application, a portion of the Subject Lands will be appropriately zoned to accommodate the NHS block.

Section D.8.4 includes policy relating to the mapping of Core Greenlands. The Official Plan states that the limits of the Core Greenlands designation may need to be refined by more detailed mapping on individual sites, such as when an Environmental Impact Study is prepared regarding a proposed development within or abutting such lands. Where more detailed mapping is available, minor adjustments may be made without an amendment to this Plan and the land use policies of the adjacent designation will apply as determined by Council. As detailed in this report, an EIS has been undertaken to assess the Subject Lands. The boundary of the proposed NHS block relies on the findings of that study.

Overall, the Concept Plan demonstrates consistency with PPS Section 4 by ensuring that adjacent development does not negatively impact the ecological function of natural features. The approach taken also conforms with County and Township Official Plan policies by protecting, maintaining, and where possible enhancing natural heritage features and functions.

It is our opinion that the Proposed Development balances growth objectives with

environmental protection, ensuring that the natural heritage system on the Subject Lands is safeguarded for the long term while still accommodating compact, complete community development in the public interest.

4.1.5 Parkland Dedication Requirements

The Wellington County Official Plan and the Township of Centre Wellington Official Plan requires that parkland shall be dedicated in accordance with the *Planning Act* for all developments, redevelopment, or plans of subdivision (Section 13.12.1 and Section C.12 respectively). The *Planning Act* requires that parkland may be conveyed in an amount not exceeding 2% for commercial and industrial development and 5% in all other cases (including residential) (Section 51.1, sub. 1).

At a rate of 5% of the net developable area of the Subject Lands, the total parkland required for the proposed development is 1.75 hectares. The proposed development will deliver a total of 1.81 hectares of parkland on the Subject Lands. Table 5 below shows the parkland dedication calculation for the Subject Lands.

Table 5: Parkland Dedication Calculation

Parkland Dedication Rate					
Land Use	Area (ha)	Conveyance Rate	Required Parkland (ha)	Provided Parkland (ha)	Surplus/ Deficiency (ha)
Single Detached Dwellings 10.0 m 12.2 m	14.89	5%	0.74	1.81	+0.06
Street Townhouses	3.98		0.20		
Rear Access Townhouses	0.78		0.04		
Park	1.81		0.09		
SWM Facilities	4.53		0.23		
Pumping Station	0.32		0.02		
Servicing Block	0.04		0.00		
Seniors Block	1.37		0.07		
Future Road	0.03		0.00		
Streets A-J (18m ROW)	7.73		0.39		
TOTAL	35.48	5%	1.75	1.81	+0.06

*Values are rounded to the nearest 100th. Total parkland is rounded up to the second decimal point.

In accordance with the *Planning Act*, the County of Wellington Official Plan and the Centre Wellington Official Plan, the proposed development will exceed the required 1.75 hectares of parkland to deliver a surplus of parkland.

The Township of Centre Wellington Official Plan provides policy direction for the provision of parkland through Sections C.12.2 and C.12.5. Section C.12.2 requires that new development dedicate parkland, or provide cash-in-lieu, to ensure that sufficient open space is available to meet the recreational needs of residents of all ages and abilities. Parkland is to be appropriately distributed throughout neighbourhoods, of adequate size and shape for recreation, and located with public street frontage to ensure visibility, safety, and accessibility. Section C.12.5 further refines this direction by establishing a hierarchy of parks, ranging from neighbourhood parks, which are larger in scale and serve the daily recreation needs of a community, to local parks, which are smaller blocks that provide convenient open space for nearby residents. Neighbourhood and local parks are to be incorporated into new subdivisions, designed with adequate frontage and safe

pedestrian access, and integrated into the broader open space and natural heritage system wherever possible. The policies also permit co-location of stormwater or utility blocks with parkland, provided functionality and safety are maintained.

The Proposed Development implements these policies by providing two dedicated park blocks on either side of the Natural Heritage System, ensuring convenient access to open space for all residents of the subdivision. The larger western park block (Block 423), at approximately 1.44 hectares, functions as a neighbourhood park. Its size, location, and integration with the NHS make it well suited for both active and passive recreation, and it will serve as a focal point for the community. The eastern park block (Block 424), at approximately 0.37 hectares, functions as a local park. Strategically located with frontage on Nichol Sideroad 15 and Street 'C', and adjacent to a stormwater management block, this park provides accessible and visible open space for the immediate residential area. Together, the two parks satisfy the Township's policy direction by delivering both a neighbourhood-scale amenity and a local park, ensuring that recreational opportunities are available at multiple levels within the community.

In our opinion, the Proposed Development conforms to Sections C.12.2 and C.12.5 of the Township Official Plan by providing appropriately scaled, accessible, and well-distributed parks that reinforce the Township's parkland hierarchy. By delivering both a neighbourhood park and a local park, with connections to the natural heritage system and stormwater management facilities, the plan ensures that residents will benefit from safe, convenient, and functional recreational spaces. These parks contribute directly to the creation of a complete, age-friendly community and support the long-term vision of the Township's Official Plan.

The Proposed Development provides 1.81 hectares of parkland, exceeding the 1.75 hectares required under the Planning Act and the County and Township Official Plans. This includes a 1.44-hectare neighbourhood park and a 0.37-hectare local park, fulfilling the Township's parkland hierarchy. Both parks are well-located with street frontage, integrated with the natural heritage system, and designed for safe, accessible use. In our opinion, the development meets the policy requirements, delivering functional recreational amenities that support a complete and inclusive community.

4.2 Policy Analysis

4.2.1 Provincial Planning Statement (2024)

The Provincial Planning Statement (the “PPS”) was introduced on October 20th, 2024, and with it, a simplified and more locally responsive planning document for municipalities. The PPS 2024 replaces both the *Provincial Policy Statement, 2020*, and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019*.

The PPS 2024 is a streamlined province-wide land use planning policy framework that provides municipalities with the tools and flexibility they need to build more homes. The PPS enables municipalities to plan for and support development and increase the housing supply across the province; align development with infrastructure to build a strong and competitive economy that is investment-ready; foster the long-term viability of rural areas; and, protect agricultural lands, the environment, public health and safety. Under the *Planning Act*, planning decisions must be consistent with the policies of the PPS.

Under the PPS 2024, Settlement Areas are to be “*the focus of growth and development*” (Policy 2.3.1.1). Settlement Areas are to be based on densities and a mix of land uses that efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, and support active transportation, among other factors (Policy 2.3.1.2). Pending approval of the Official Plan Amendment applications (Township File OP003-2025 and County File OP-2025-06), the Subject Lands will be located within a Settlement Area and will be appropriately designated to accommodate growth.

The Subject Lands are proposed to be located in the settlement boundary to allow for and accommodate future growth, in accordance with the policies of the PPS 2024. As demonstrated by the Draft Plan, the proposed development can be accommodated in a manner that efficiently uses land and resources, optimizes existing and planned infrastructure and public service facilities, supports active transportation, and protects natural features.

On this basis, and as demonstrated in earlier sections of this report, it is our opinion that the proposed development of the Subject Lands represents an efficient and appropriate opportunity to accommodate required growth, is representative of good planning, is consistent with the PPS 2024 policies, and should be accepted on this basis.

4.2.2 County of Wellington Official Plan

The County of Wellington Official Plan (“County OP”) was adopted by Wellington County 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 latest consolidation of the Wellington Official Plan, which has been used for the preparation of this report, is dated May 2025.

The County OP is intended to give direction over 20 years to the physical development of the County, its local municipalities, and to the long-term protection of County resources. The Wellington County Official Plan enshrines the concepts of sustainable development,

land stewardship, and healthy communities as part of the fundamental beliefs that underpin the directions of the plan. Land use and servicing decisions must conform to the policies of the County OP.

Development Objectives

The County of Wellington Official Plan encourages development patterns that:

- are cost-efficient;
- are environmentally sound;
- are compatible with existing uses;
- maintain small-town character;
- maintain resource land; and,
- provide access to community services and facilities.

In accordance with this direction, the Proposed Development will direct growth to a primary settlement area as designated in the County Official Plan (pending approval of the active Official Plan Amendment submitted to the County). The Proposed Development features a combination of housing typologies, including low to medium-density residential uses and seniors housing, in order to facilitate a robust housing stock.

The Proposed Development is aligned with the County's policy direction on compatibility and small-town character by introducing a development pattern that complements its surroundings while diversifying the housing stock. While the plan is not directly abutted by existing residential uses, it delivers a balanced mix of housing types, including single-detached dwellings together with townhouses and a seniors' block, thereby contributing to greater housing choice in the community. The plan also establishes a dedicated Natural Heritage System (NHS) block to ensure the long-term protection of natural features, consistent with the County's environmental objectives. In addition, the development will efficiently utilize existing infrastructure and community service facilities, as demonstrated in the MTE Functional Servicing and Stormwater Management Report, supporting orderly and cost-effective growth.

Primary Urban System

Pending approval of the active Official Plan Amendment of the Subject Lands and for the purposed of this report, the Subject Lands will be designated as part of the Primary Urban System within the County's identified Urban Boundary; which is intended to support a full range of land uses, including residential, commercial, industrial, institutional, and open space uses (Policy 7.4.1). The Subject Lands are considered to be part of the Designated Greenfield Area, which forms a portion of the primary urban centre that is defined as an area within a settlement area that is not a built-up area.

Primary Urban Centres – Residential Policies

Primary Urban Centres are intended to provide a broad range of residential uses to deliver a diverse supply of housing, including affordable housing, to deliver a diverse range and

mix of housing options, densities, and unit sizes on full municipal services (Policy 7.4.5). The Proposed Development aligns with this direction by delivering a diverse housing stock that will increase the proportion of townhouse units within Elora/Salem, as demonstrated in this report.

Part 8 of the County Official Plan sets out detailed policy direction for Primary and Secondary Urban Centres. The Residential designation policies detailed under Section 8.3.1 permit a wide variety of housing types, including detached and semi-detached dwellings, townhouses, and apartments, as well as other housing forms and non-residential uses subject to zoning by-law and plan policies (Section 8.3.3). The Proposed Development delivers a residential built form in alignment with these high-level permissions.

The County Official Plan considers single-detached, semi-detached, and duplex dwellings to be low-density housing forms. The CWOP emphasizes that the character of existing low-density residential neighbourhoods should generally be protected (Policy 8.3.4).

The County Official Plan also states that multiple residential developments, such as townhouses and apartments, may be allowed in areas designated residential, subject to the requirements of the Zoning By-law and provided that the following criteria of the County Official Plan under Section 8.3.5 are met:

Table 6: Multiple Residential Units Criteria

	Policy Requirements	Response
a)	that medium-density development on full municipal services should not exceed 35 units per hectare (14 units per acre) for townhouses or row houses, and 75 units per hectare (30 units per acre) for apartments, although it may not always be possible to achieve these densities on smaller sites;	The proposed development proposes medium-density development at approximately 31.4 units per hectare, inclusive of the local roads on which these units have frontage. As such, Section 8.3.5 is satisfied. With respect to the proposed seniors facility, a final unit count and density will be determined at the site plan stage. For the purposes of this report, it is assumed that the density of this block will be 75 units per hectare, in alignment with the density threshold for apartment units under the County OP.
b)	that the design of the proposed height, setbacks, landscaping, and vehicular circulation, will ensure that it will be compatible with existing or future development on adjacent properties;	The design of the proposed townhouse dwellings will comply with the height and setback requirements set out in the adjacent townhouse zone, which was recently approved. The Proposed Development has regard for the future development of the Keating Lands to the south, so as not to preclude the future development of these lands. Appropriate

		connectivity has been planned for future connectivity to this property. The orientation of townhouse dwellings within the proposed development also reflects the positioning of similar units on the western side of Irvine Road. It is our opinion that, through the proposed draft plan of subdivision and the associated zoning by-law amendment, the appropriate standards will be implemented. The proposed seniors' housing block will be developed through a future site plan application, at which time this policy will be analyzed and addressed.
c)	that the site of the proposed development has a suitable area and shape to provide: i) adequate on-site landscaping to screen outdoor amenity areas both on the site and on adjoining property, to buffer adjacent residential areas and to improve the overall appearance of the development; ii) on-site amenity areas for the occupants of the residential units; iii) adequate off-street parking, access and appropriate circulation for vehicular traffic, particularly emergency vehicles; and iv) adequate grading to ensure that drainage from the property is directed to public storm drainage facilities and not to adjoining properties.	The proposed development is appropriately shaped and sized to accommodate the proposed medium-density townhouse units. In particular, the proposed lots are sized to implement the standards of the zoning by-law. The proposed development is supported by the delivery of parks and a central NHS block that are intended to deliver and provide amenity space for residents. Adequate on-site landscaping will be provided to screen private outdoor amenity areas, including fencing both on the site and on adjoining properties, to buffer adjacent residential areas, and to improve the overall appearance of the development. Further details will be provided at the detailed design stage. The proposed townhouse dwelling units will provide private on-site amenity space, including outdoor private yards, as well as potentially balconies on the rear lane product. One garage and one driveway parking space will be provided per unit. Off-street parking will be provided in compliance with the Township zoning by-law. The townhouse units will be accessed via municipal roads, which will provide appropriate circulation for vehicular traffic. As detailed in the Functional Servicing and Stormwater Management Report prepared by MTE, adequate grading has been designed to ensure that drainage from the property is directed to public storm drainage facilities

		and not to adjoining properties. The proposed seniors' block is adequately sized to accommodate the future proposed use. The design of this site will occur at the site plan stage.
d)	that adequate services such as water, sewage disposal, storm water, roads and hydro are available to service the development;	As detailed in the concurrently submitted Functional Servicing and Stormwater Management Report prepared by MTE, adequate services will be provided to facilitate the proposed development.
e)	that within the built boundary, medium density is encouraged to locate on major roadways and arterial roads;	Not applicable. The Subject Lands are outside of the delineated built boundary.
f)	that in greenfield areas, medium density is encouraged to locate on major roadways, and roads designed to serve an arterial or collector function, while street townhouses are allowed on local roads;	The proposed development generally orients the proposed medium-density dwelling units toward Irvine Street, the north/south collector on the western side of the Subject Lands. In accordance with this policy direction, rear-access units are proposed immediately adjacent to Irvine Street. Street townhouse units are proposed immediately east of these units, with frontages on the proposed local roads Likewise, the proposed seniors' housing is located on the eastern side of the site, along Gerrie Road, with additional frontage on Street 'C'.
g)	that a separate zone(s) is established for multiple residential development.	The Zoning Bylaw Amendment proposes separate zones for the different unit types, consistent with the approved zoning framework for the lands to the west (Clayton), which were recently approved by the Township. The proposed zoning by-law amendment will implement an appropriate zone to accommodate this proposed use.

The provision of medium-density housing is an important component of the Proposed Development, aligning with County objectives for providing more attainable housing options and offering a balanced approach to accommodating future growth and meeting the community's housing needs. Based on the above, it is our opinion that the future multiple residential development types conform to the policies of the County Official Plan.

In addition to the above, the County Official Plan includes a specific sub-heading and policies for Residential Care Facilities (Section 8.3.9). That policy states that rest homes, nursing homes, and homes for the aged may be allowed, subject to the appropriate zoning

regulations and in general compliance with the locational criteria established for multiple residential development. As demonstrated in Table 6, it is our opinion that the proposed Seniors facility is appropriate in accordance with the policies of the County Official Plan.

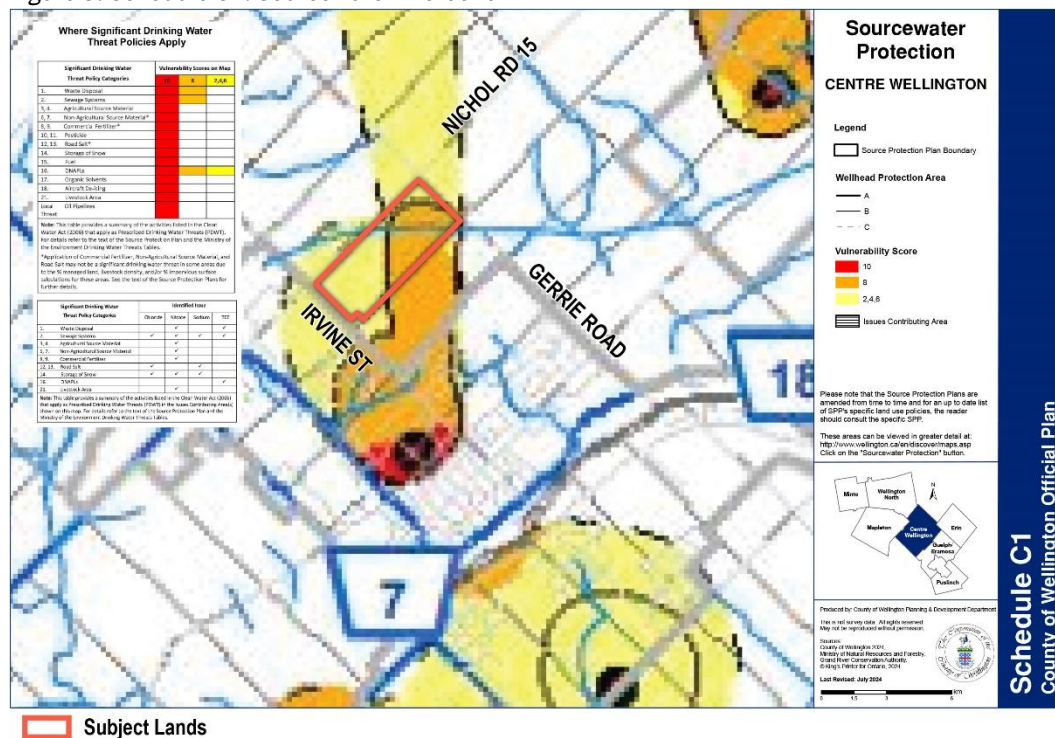
Greenlands System

The applicable policies related to the Regional Greenlands System are addressed in Section 4.1.4 of this Report. As detailed in that Section, it is our opinion that the proposed development conforms to the County's Greenlands System policies, based on the findings of the EIS.

Wellhead Protection

Schedule C1 of the County Official Plan identifies that the Subject Lands are within Wellhead Protection Areas 'B' and 'C' and are subject to the applicable policies of the County Official Plan. These areas are also subject to the vulnerability score identified on this Schedule and are located within areas identified as '2,4,6' and '8', as shown in Figure 3.

Figure 3: Schedule C1: Sourcewater Protection



The Official Plan describes the Wellhead Protection Area as “an area that is related to a wellhead and within which it is desirable to regulate or monitor drinking water threats because land use activities in these areas have the potential to affect the quality or quantity of water that flows into the well” (Policy 4.9.5.1). It is noted that the ‘vulnerability score’ identifies the degree to which a WHPA or IPZ within the County is vulnerable to contamination. The vulnerability score of an area can range from 1 to 10, with 10 being

the most vulnerable.

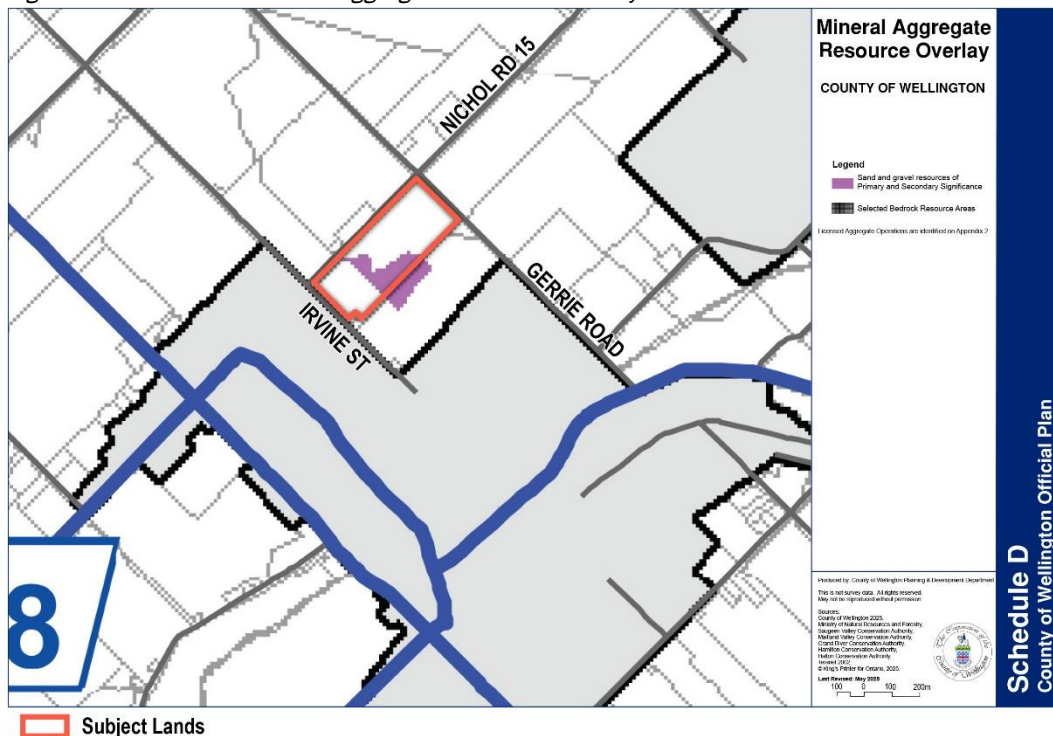
Section 4.9.5.2 defines that land use activities that may pose a drinking water threat to municipal water supplies are defined by the Clean Water Act, 2006. These uses generally include disposal sites, storage sites for materials, chemicals, fuel, and any that reduce the recharge of an aquifer, among similar uses, as listed in Section 4.9.5.2 of the Official Plan. The Proposed Development does not include any sensitive land uses that would pose a threat to drinking water.

Section 4.9.5.3 of the County Official Plan states that, notwithstanding the land uses permitted by the underlying land use designation in this Official Plan, an application for development, redevelopment, or site alteration within a Wellhead Protection Area, Intake Protection Zone, or Issue Contributing Area where a drinking water threat could be significant requires a Section 59 Notice issued by the Risk Management Official. If a Section 59 notice is required, it will be dealt with through the development approvals process.

Mineral Aggregate Resource Overlay

The Subject Lands are partially subject to a Mineral Aggregate Resource Overlay, as shown on Schedule D of the County Official Plan (Figure 4), identifying a "sand and gravel resources of Primary and Secondary Significance" overlay. According to the County Official Plan, this information is based on geological data from the Ministry of Northern Development and Mines (ARIP No. 162).

Figure 4: Schedule D - Mineral Aggregate Resource Overlay



Section 6.6 and 6.6.1 of the County Official Plan state that the overlay is intended to identify areas with high potential for aggregate extraction, but does not presume that extraction is appropriate in all cases [emphasis added]. Development on or adjacent to the overlay is permitted if aggregate extraction is deemed infeasible, the proposed development serves a greater long-term public interest, and issues of public health, safety, and environmental impact are addressed.

Per Section 2.9 of this report, Soil-Mat has prepared a Mineral Resources Consideration Letter relating to Aggregate Resource Potential, dated February 12, 2025, that concludes the Subject Lands are predominantly composed of sandy and silty soils with no mineral aggregate resource potential. This analysis demonstrates that aggregate extraction on the Subject Lands is not necessary. As such, the proposed development is consistent with the policies of the County Official Plan, as it does not impact aggregate resources.

To this end, we note that the County Official Plan includes a policy that certain areas are excluded from the overlay. Primary and secondary urban centres (plus a 300-metre buffer), provincially significant wetlands, and significant woodlands, to account for environmental and land use constraints, are listed as such uses. Pending approval of the Official Plan Amendment, the Subject Lands will be located within a primary urban centre and will thereby be exempt from the mineral aggregate resource overlay

Conclusion

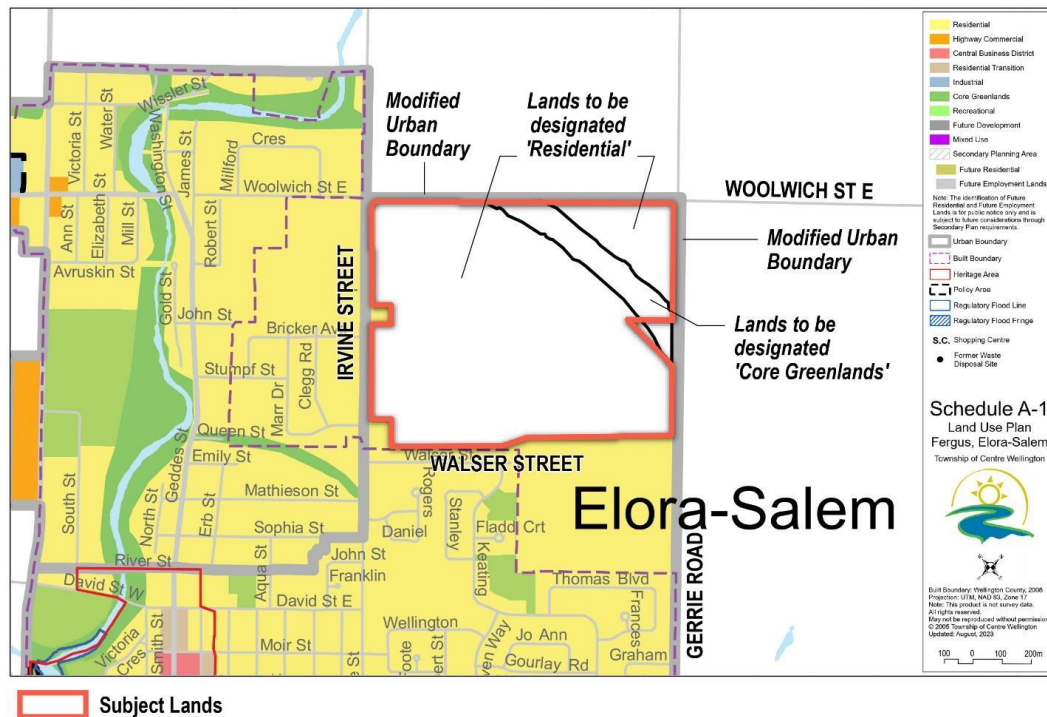
Based on the above, it is our opinion that the proposed development and the enabling zoning by-law amendment conform to the policies of the County Official Plan. It is our opinion that this application is representative of good planning, is in the public interest, and should be approved on this basis.

4.2.3 Township of Centre Wellington Official Plan (2024 Consolidation)

The Centre Wellington Official Plan (“Township Official Plan”) was adopted in November 2003 and subsequently approved in May 2005. The Township Official Plan is a policy document outlining the Township’s vision for land use, emphasizing the preservation of community character while enabling managed growth. The Official Plan outlines goals, objectives, and policies to guide future physical, social, and economic development, and change within the Township. This report analyzes the December 2024 Township Official Plan, which is the latest iteration of the Official Plan as of the writing of this report.

Pending the approval of the active Official Plan Amendment, the Subject Lands will be located within the Township’s Urban Boundary and redesignated both Residential and Core Greenlands, which is shown in Figure 5. The report is prepared on the basis that the Official Plan Amendment is approved.

Figure 5: Proposed Official Plan Amendment



Residential Designation Policies

The residential designation policies of the CWOP are outlined under Section D.2 of that Plan. Those policies acknowledge the predominance of single-detached homes in urban centres, but highlight the need for diverse and affordable housing types, including townhouses, apartments, and group/nursing homes, to address evolving housing demands. Although the Township maintains that the predominant form of housing is to remain primarily comprised of single detached dwellings, the Plan expects that these higher-density dwelling types may eventually account for at least one quarter of all housing units in Fergus and Elora-Salem, where full municipal services are available.

The Official Plan outlines objectives to ensure that the character and integrity of existing residential areas are preserved while enabling controlled growth and development within the community. The Proposed Development is generally intended to align with these objectives, as applicable, by providing a variety of dwelling types in a manner that maintains the small-town character of Elora-Salem, among other matters.

The permitted uses detailed in the Official Plan are defined under Section D.2.3. This Section permits a variety of housing types, but low-rise and low-density housing forms such as single-detached and semi-detached dwelling units shall continue to predominate. It is noted that townhouses, apartments, and nursing/group homes are permitted subject to the requirements of the Zoning By-law and the applicable policies of the Official Plan. Medium-density housing typologies, permitted under Section D.2.5, are subject to criteria outlined in the Plan, as evaluated below. As such, the proposed dwelling

types are a permitted use.

In accordance with the general residential policies of the Official Plan, the Proposed Development will deliver a variety of housing options that simultaneously reflect the context of the surrounding community in delivering a housing mix primarily comprised of single-detached dwellings while supplying medium-density housing typologies. The proposed medium density types include a range of medium density residential dwellings in the form of street- and rear-access townhouses, and a seniors housing block.

It is our opinion that the proposed development conforms to the policies of the Township Official Plan and will contribute to the achievement of the Plan's objectives by introducing diverse and attainable housing types, utilizing existing infrastructure, and maintaining compatibility with the community.

Low-Density Development

The Official Plan states that the Zoning By-law may provide separate zones for only single-detached, semi-detached or duplex dwelling units or a combination of any of the above. In accordance with this direction, the proposed zoning by-law amendment rezones the Subject Lands with separate zoning classifications for the proposed single-detached dwellings within the proposed development.

The Official Plan also articulates that the character of existing low-density residential neighbourhoods should generally be protected. Although the proposed development does not immediately abut established residential uses, the proposed built form is similar to the surrounding future development on the Clayton Lands and has regard for the future development of the Keating Lands, so as not to prevent or preclude development.

Medium Density Development

The Official Plan articulates that multiple residential developments, such as townhouses and apartments, may be allowed in areas designated residential, subject to the requirements of the Zoning By-law and further provided that the requirements of Policy D.2.5 are met. The Township's criteria mirror the County criteria addressed in Section 4.2.2 of this report.

Based on the analysis provided in Table 6, it is our opinion that the Proposed Development satisfies the medium-density development criteria of the Township's Official Plan.

Residential Care Facilities

Similar to the County Official Plan, the Township Official Plan provides specific policies relating to Residential Care Facilities under Section D.2.9. As above, this criterion is addressed in Table 6 of this report.

Conclusion

The proposed dwellings will contribute to the vision of the Township's Official Plan to

implement a variety of housing options while reflecting the context of the surrounding community. The proposed dwelling types are permitted under the Township of Centre Wellington Official Plan. The arrangement of the proposed dwellings on the Subject Lands reflects the proposed development on surrounding lands, generating a like-on-like interface and an appropriate transition from Irvine Street. The conformity of the Proposed Development with the criteria for medium-density housing is addressed in Table 6 of this report.

General Development Policies

The Township of Centre Wellington intends that new building lots be created via a Plan of Subdivision when four or more lots are being created, a new road or a substantial extension to an existing road is required, or where special concerns or issues exist which would best be dealt with through a plan of subdivision (Policy E.9.1 1-3).

In alignment with this direction, the Proposed Development is proceeding by way of a draft plan of subdivision. The Official Plan states that draft plans of subdivision shall satisfy the following criteria:

Table 7: General Development Policies

	Policy Requirement(s)	Response
1.	The proposed plan of subdivision conforms to the objectives, General Policies of Section "C" and land use designations of this Municipal Plan, as well as the County of Wellington Official Plan	It is our opinion that the proposed development conforms to the objectives set out in Section C of the Centre Wellington Official Plan, as detailed in this report. Pending approval of the official plan amendment, the proposed development will be appropriately designated to facilitate residential growth in keeping with the growth management objectives.
2.	Necessary services, utilities, and community facilities can be provided to the proposed subdivision.	As demonstrated in the Functional Servicing and Stormwater Management Report prepared by MTE, adequate planned /existing infrastructure is available to support the proposed development.
3.	The proposed plan of subdivision will not negatively affect transportation networks, abutting land uses, and other features of the natural or built environment.	A Transportation Impact Study has been prepared by Paradigm Transportation Solutions Limited, which includes an analysis of pre- and post-development trip analysis as well as recommendations relating to road functions. The Proposed Development has regard for local transportation networks and provides road stubs for future connection to the Keating Lands. The Proposed Development has regard for

		the surrounding land uses, including proposed and future development, so as to not preclude nor prevent the future development of these lands. The Proposed Development implements an NHS with the goal of protecting features and buffers for the long term.
4.	The proposed plan of subdivision is not considered to be premature and is within the public interest.	The Draft Plan has been thoroughly assessed and is appropriately supported by technical studies. The Draft Plan is in the public interest based on the policy analysis. It implements the goals of the Township, County, and Province to accommodate growth within a settlement area, where residential growth should be focused, delivers development, and provides housing in keeping with the planned intent of the Centre Wellington Official Plan.
5.	The proposed plan of subdivision is compatible with the existing built form of the Township, including adjacent land uses and road patterns.	The proposed development and the various residential uses therein are intended to reflect the proposed built form of the surrounding lands. This generally includes a like-on-like interface along Irvine Road, with a transition to single-detached housing. The proposed road network employs a modified grid pattern in alignment with the surrounding existing development located to the south.
6.	The proposed plan of subdivision will not unreasonably impact the financial position of the Township in terms of the cost of providing additional services to the new development.	Pending approval of the official plan amendment, the proposed plan of subdivision is located in a designated settlement area which is planned for full municipal water and wastewater.

It is our opinion that the proposed development represents a logical, cost-effective, and compatible development that will utilize existing infrastructure and generate housing types of various densities. As confirmed by MTE, adequate infrastructure is available to support the proposed development. The configuration of the Proposed Development is compatible with surrounding land uses and road networks and has appropriate regard for surrounding lands and future development.

It is therefore our opinion that the Proposed Development is compatible with the applicable plans and policies of the Township and County Official Plans, that the proposed development meets the criteria listed above, and helps the Township realize the objectives articulated in the Official Plan.

Natural Heritage and Core Greenlands

The Natural Heritage and Core Greenlands policies of the Township Official Plan are assessed in Section 4.1.4 of this Report. Relying on the findings of the EIS, it is my opinion that the proposed development conforms to the applicable Natural Heritage and Core Greenlands policies.

Stormwater Management Ponds

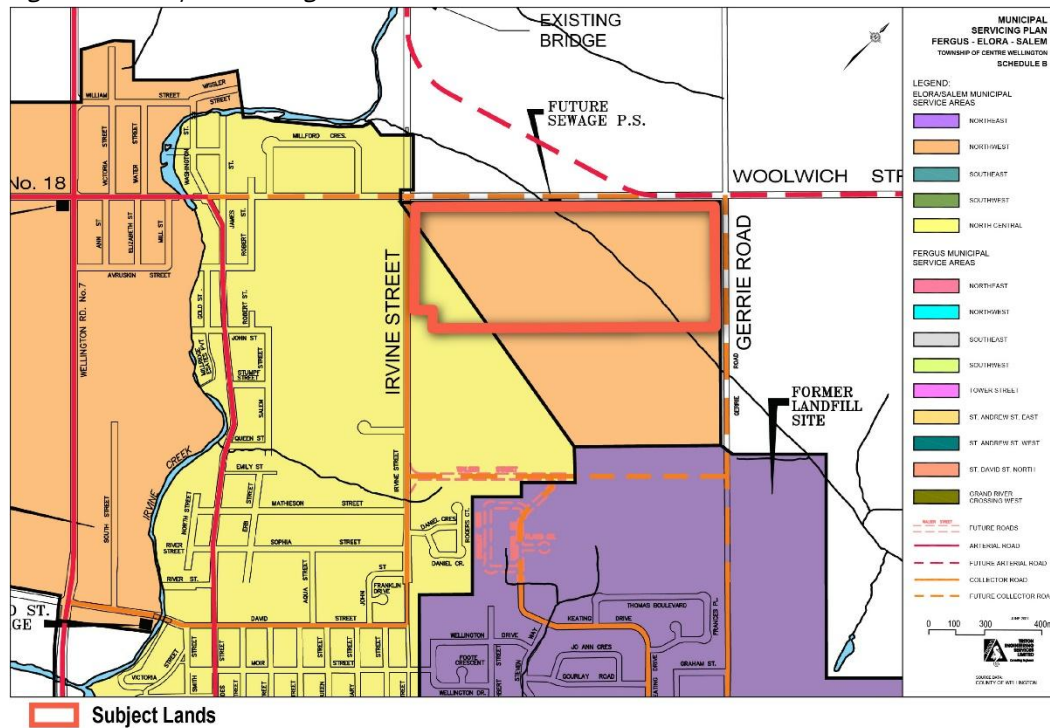
Section C.7 of the Township Official Plan articulates the Township's goal of encouraging effective management of storm water drainage and run-off through the implementation of best management practices and storm water management techniques. The Plan states that development shall not occur without appropriate regard for storm run-off, on-site collection and channelling of storm water to an adequate outlet, and that detention/retention ponds may be used as part of the storm drainage system to maintain post-development flows to pre-development levels.

A Functional Servicing and Stormwater Management Report, prepared by MTE and submitted as part of this application, demonstrates how stormwater will be managed on the Subject Lands. Per the MTE reports, two stormwater management facilities (SWMFs) are proposed in the Draft Plan that have been designed in accordance with the criteria established in those reports. The MTE Reports conclude that quantity control targets for post-development peak flow rate attenuation to pre-development levels that are directed to the Nichol Drain can be achieved in the proposed SWMFs for all storm events up to and including the 100-year event. The proposed facilities have been integrated with the Natural Heritage System to provide both quality and quantity control, ensuring the development can proceed in a safe, efficient, and environmentally sound manner. In our opinion, the proposed stormwater management strategy satisfies the Township's policy direction under Section C.7 of the Official Plan.

Municipal Servicing Plan

The Township Official Plan articulates that new development will be required to connect to these services where they are available. It is the long-term intention of the Township to eventually provide municipal sewage and water services to all of the areas that are designated as part of the Fergus and Elora-Salem Urban Centres (Section C.6.2).

Figure 6: Municipal Servicing Plan



The Subject Lands are shown on Schedule “B” as being within the ‘North Central’ and ‘Northwest’ Elora/Salem Municipal Service Area. The Township Official Plan states that Schedule “B” illustrates the major trunk Sanitary Sewer Servicing Areas associated with the Fergus and Elora municipal infrastructure. In the design of servicing for new growth, the Sanitary Sewer Servicing Areas shall be considered, and infrastructure shall be sized accordingly.

The Township Official Plan also states that the lands shown on Schedule “B”, which are outside of the Urban Centre boundary, do not imply that services will be extended beyond the Urban Centre boundary or that such lands can be developed without first being designated Urban Centre in accordance with all other applicable policies of this Plan.

Pending the approval of the active Official Plan Amendment, the Subject Lands will be included within the Urban Centre boundary. In accordance with the direction of C.6.2, the proposed development will connect to municipal services.

The Township’s long-term vision is to extend municipal services to all lands designated as part of the Fergus and Elora-Salem Urban Centres, as well as adjacent lands, including

the Subject Lands. While the Subject Lands are currently outside the Urban Centre boundary, they are proposed for inclusion as part of the settlement area through this application. This aligns with the broader intent of the Township to manage growth efficiently and extend services to areas identified for urban development.

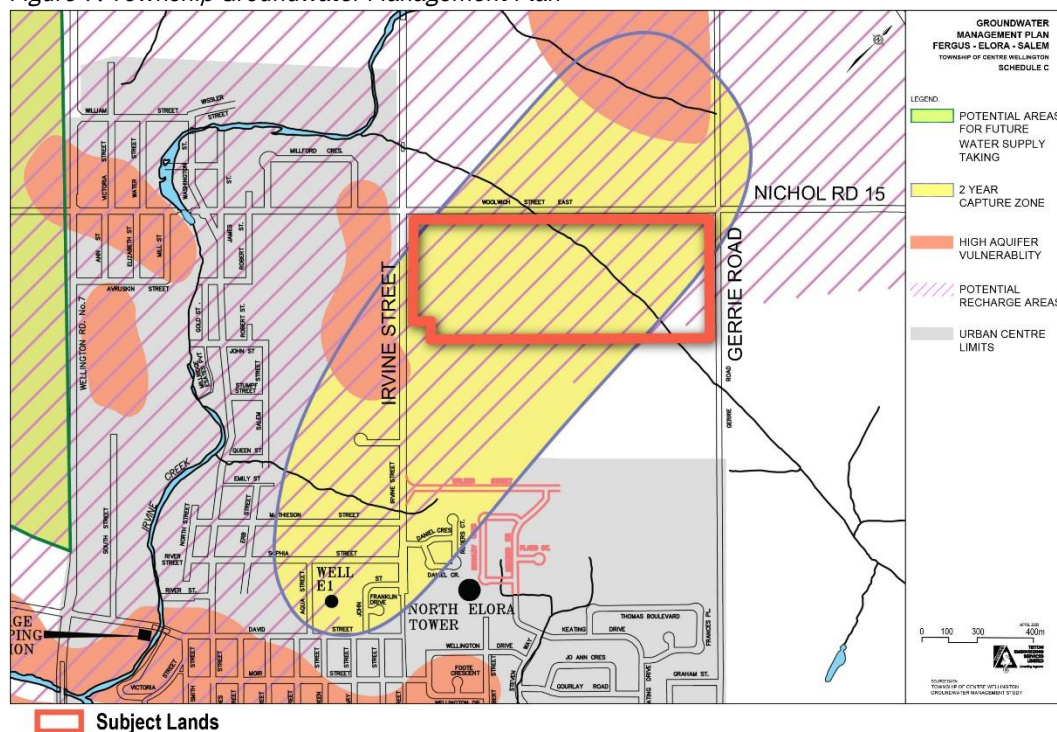
To address servicing requirements, a Functional Servicing and Stormwater Management Study has been prepared by MTE for the Subject Lands. The study demonstrates that municipal infrastructure exists and can be extended to the Subject Lands with minimal investment. It outlines the feasibility of connecting to existing municipal sewer and water services, aligning with the Township's infrastructure capacity and growth objectives.

Groundwater Management Plan

The Township Official Plan describes four types of Groundwater Management Areas, consisting of Areas of high aquifer vulnerability; well field capture zones; areas of potential future water supply; and recharge areas. The general extent of these areas within and adjacent to the Fergus, Elora-Salem, and Belwood Urban Centres is illustrated on Schedule "C".

The Township Official Plan describes that, while the groundwater management areas are not a land use designation, they are only provided for information purposes. The Groundwater Management Areas shall be a factor to be considered in the review of development applications.

Figure 7: Township Groundwater Management Plan



As shown in Figure 7, the Subject Lands are subject to the '2 year capture zone' and potential recharge area' overlays.

Protection Zones

The Township Official Plan describes that well field capture zones have been delineated for the municipal wells in Fergus and Elora using the groundwater flow model developed as part of the Groundwater Study. Schedule "C" shows the simulated area for the 2-year time of travel for the Fergus and Elora municipal wells. A 2-year time of travel zone is proposed to delineate an appropriate area for wellhead protection. This area warrants special consideration due to the increased potential for surface contamination to rapidly reach the well. There will be a limited opportunity for mitigation of groundwater contamination within this zone.

Policy direction for Wellhead and Capture Zone Protection is detailed under Section C.4.5.2 b). This Section articulates that *"well field capture zones have been delineated for the municipal wells in Fergus and Elora using the groundwater flow model developed as part of Groundwater Study. Schedule "C" shows the simulated area for the 2-year time of travel for the Fergus and Elora municipal wells. A 2-year time of travel zone is proposed to delineate an appropriate area for wellhead protection. This area warrants special consideration due to the increased potential for surface contamination to rapidly reach the well. There will be limited opportunity for mitigation of groundwater contamination in within this zone"*.

Recharge Areas

The Township Official Plan also describes that major recharge areas within and adjacent to the Urban Centres are shown on Schedule "C". These areas represent areas of higher permeability surficial deposits. Recharge areas are recognized for their contribution to the groundwater system. Education and awareness, as well as potential methods of increasing recharge through specific management practices, should be linked to drought management programs through the GRCA. The ability to potentially increase recharge over long periods of time, especially during periods of high precipitation and/or runoff, will aid in maintaining higher water table conditions on a more regional scale during dry periods. This will, in turn, sustain baseflow for longer periods of time during drought conditions.

Recharge Areas are defined under Section C.4.5.2 d) as *"major recharge areas within and adjacent to the Urban Centres are shown on Schedule "C". These areas represent areas of higher permeability surficial deposits. Recharge areas are recognized for their contribution to the groundwater system. Education and awareness, as well as potential methods of increasing recharge through specific management practices, should be linked to drought management programs through the GRCA. The ability to potentially increase recharge over long periods of time, especially during periods of high precipitation and/or runoff, will aid in maintaining higher water table conditions on a more regional scale during dry periods. This will in turn, sustain baseflow for longer periods of time during*

drought conditions”.

Conclusion

As detailed in the preliminary hydrogeological investigation prepared by Soil-Mat Engineers, it is acknowledged that the Subject Lands are within Wellhead Protection Area (WHPA). However, that report concludes that there would be no anticipated negative impact from the proposed development on nearby potable wells, including municipal supply wells. Further, the preliminary hydrogeological assessment articulates that given the proposed development would be serviced through a municipal water supply, there would be no impact to potential supply aquifers or associated water wells in the area, if any.

4.2.4 Township Of Centre Wellington Comprehensive Zoning By-Law No. 2009-045 (2022 Office Consolidation)

The Subject Lands are currently designated Agricultural (A) and are partially subject to an Environmental Protection and Environmental Protection Overlay, Per Schedule ‘A’ (Map 12: Salem-Pilkington of the Rural Zoning Maps, shown below).

Figure 8: Township Zoning Schedule Excerpt



The provisions of the Agricultural 'A' zone specify that the following uses are permitted, and include agricultural and associated uses. As such, in order to enable the proposed development, a zoning by-law amendment is required.

Proposed Zoning By-law Amendment

The proposed Zoning Bylaw Amendment is intended to rezone the Subject Lands from Agricultural (A) to Residential Two Exception (R2.52.5), Residential Three Exception (R3.52.6/R3.52.7), Residential Four Exception (R4.XX), Open Space (OS) and Environmental Protection (EP) to facilitate the proposed development. The proposed amendment implements the permitted uses contemplated for the Subject Lands under the Centre Wellington Official Plan (as proposed to be appropriately amended) and will mirror the recently approved zoning standards from the lands immediately to the west (Clayton), ensuring consistency and compatibility. These standards reflect contemporary zoning practices that balance efficiency, flexibility, and good urban design.

In addition, the proposed zoning also establishes standards for the seniors' block that are intentionally flexible, allowing the site to accommodate a variety of built forms depending on market demand—ranging from small-scale options such as tiny homes to higher-density forms such as a low-rise apartment. This flexibility ensures that the development can adapt to evolving housing needs while delivering on the Township's objectives for a diverse and inclusive housing supply.

5.0 Planning Opinion

5.1 Statement of Conformity with Policy Documents

As discussed in this report, Provincial Planning Statement (2024), the County of Wellington Official Plan, and the Township of Centre Wellington Official Plan have been reviewed to assess the appropriateness of the Proposed Development. Through our analysis, it is our opinion that the Proposed Development is consistent with or conforms to the policies of these documents, as proposed to be amended, and implements good planning that is in the public interest.

5.2 Planning Act – Section 51(24)

The Draft Plan of Subdivision represents good planning as it delivers a compact built form with an appropriate form of housing. Its approval will result in a logical and efficient street pattern. The development implements the policies of the Wellington County Official Plan and the Township of Centre Wellington Official Plan. Section 51(24) of the *Planning Act* sets criteria that planning authorities shall “have regard to” when considering a Draft Plan of Subdivision. Our responses to the criteria are provided in Table 8 below:

Table 8: Section 51(24) of the Planning Act

	Criteria	Response
a)	The effect of the development of the proposed subdivision on matters of provincial interest as referred to in Section 2.	The Draft Plan of Subdivision and associated Zoning By-law Amendment have been reviewed on the basis that the active Official Plan Amendments (Township (File No. OP003-2025) and the County (File No. OP-2025-06)) will be approved and the Subject Lands will be included in the urban boundary. On this basis, matters of Provincial interest have been properly regarded. In accordance with Section 2 of the Planning Act, the proposed development has regard for the following applicable matters: - conservation and management of natural resources through the

		identification of the limits of the natural heritage system and creation of a natural heritage block that will ensure protection for the long term. - Conservation and management of natural resources and the mineral resource base are considered part of this application. The Soil-Mat memo prepared in support of this application concludes that the Subject Lands do not have mineral aggregate resource potential. - orderly development of safe and healthy communities by delivering a logical continuation of development with connectivity to surrounding lands. - adequate provision and distribution of educational, health, social, cultural, and recreational facilities, which are available in close proximity to the Subject Lands in the Elora-Salem community. - adequate provision of a full range of housing, including affordable housing, by contributing to a contextually appropriate housing stock of various sizes. The Draft Plan of Subdivision ensures conformity with growth management and natural heritage, among other matters, under applicable planning documents.
b)	Whether the proposed subdivision is premature or in the public interest.	Contingent upon the approval of the Official Plan Amendment, it is our opinion that the proposed development is in the public interest and is not premature. The Proposed Development has regard for the future development of neighbouring lands so as not to prevent or preclude future development thereon. The Draft Plan is in the public interest based on the policy analysis detailed in this

		report. As described, the policy analysis contained herein is subject to the approval of the active Official Plan amendment, which is intended to redesignate the Subject Lands for residential uses. On this basis, the Proposed Development implements the goals of the Township, County, and Province to accommodate growth within a settlement area, deliver a robust development, and provide housing in keeping with the planned intent of the Centre Wellington Official Plan.
c)	Whether the plan conforms to the official plan and adjacent plans of subdivision, if any.	As above, the opinions rendered in this report rely on the approval of the active Official Plan Amendment. Our conformity analysis is premised on the expectation that the Subject Lands will be appropriately designated under the applicable Official Plans. On this basis, it is anticipated that the proposed development will conform to both the Township and County Official Plans. The Draft Plan is adjacent to previously approved plans of subdivision, and it allows for the logical continuation of development, and delivers context-appropriate housing, among other official plan requirements, as assessed in this report.
d)	The suitability of the land for the purposes for which it is to be subdivision.	The proposed development blocks in the Draft Plan are located on lands suitable for the proposed uses, pending approval of the active Official Plan amendment. This is supported by the technical studies submitted as part of this application.
e)	The number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them.	The Transportation Impact Assessment prepared by Paradigm Transportation Solutions Ltd. assesses the function of traffic on and surrounding the Subject Lands. The TIS acknowledges that the proposed development will take access via 6 new local roads connecting to Irvine Street, Nichol Sideroad 15, Gerrie Road,

		and the future Keating development. The TIS also acknowledges that a new network of municipal streets is proposed internal to the Proposed Development to provide individual property access. The proposed development delivers a modified grid network of local roads that allows for a logical continuation of the Elora-Salem community. The TIS concludes that the new road connections are anticipated to operate acceptably with minimal delay. The TIS concludes that the residential development is forecast to generate approximately 378 and 508 trips during the AM and PM peak hours. The TIS finds that the area intersections are forecast to operate within acceptable levels of service under 2035 and 2040 background horizons.
f)	The dimensions and shapes of the proposed lots.	All proposed lots are dimensioned and will achieve an appropriate shape and size, in conformity with the proposed standards set out by the enabling zoning by-law amendment.
g)	The restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land.	The proposed Zoning By-law Amendment will support the appropriate standards and restrictions on the lands proposed to be subdivided by limiting their use to those permitted in the zoning standards.
h)	Conservation of natural resources and flood control.	Our Planning Opinion Report relies on the findings of the EIS, prepared by Beacon Environmental. The EIS characterizes existing natural heritage features on the Elora Sands subject property within the study area and addresses potential impacts of the proposed development on the natural heritage features and functions on and immediately adjacent to the proposed development. An EIS articulates that the NHS was identified through this EIS on and

		adjacent to the Elora Sands subject property in accordance with the applicable natural heritage policies. The identified natural heritage features within the NHS will be protected and buffered with the proposed development plan. With the implementation of the recommended mitigation measures, the EIS states that the proposed development plan demonstrates conformity and consistency with applicable natural heritage policies as set out in the PPS, County of Wellington OP, Township of Centre Wellington OP, and GRCA regulations. On this basis, it is our opinion that the proposed development sufficiently minimizes impacts on the natural features. Based on the above, it is our opinion that the proposed development is good planning
i)	The adequacy of utilities and municipal services.	The Draft Plan can be serviced with adequate utilities and municipal services, as demonstrated by the background studies submitted in support of the proposed development.
j)	The adequacy of school sites.	The Subject Lands are expected to benefit from existing school facilities in proximity to the Proposed Development. The proposed development is expected to generate approximately 161 public elementary students, 70 public secondary school students, 60 catholic elementary students, and, 20 catholic secondary school students based on the pupil yields provided in the Upper Grand District School Board and Wellington Catholic District School Board Education Development Charge (EDC) Background Study, prepared by Watson and Associated Economists Ltd. in March 20 th , 2024 (See Appendix 'A'). It is expected that the school boards will (as a

		commenting agency) review the application, confirm capacity, and may impose conditions for draft plan approval.
k)	The area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes.	All parkland, public roads, proposed pumping station, and walkway blocks in the Draft Plan will be conveyed into public ownership.
l)	the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy	The Draft Plan promotes energy conservation by promoting a compact, modified grid pattern design that encourages active transportation. The proposed development will benefit from the close location of the existing community uses in the Elora-Salem community.
m)	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 or subsection 114 (2) of the <i>City of Toronto Act, 2006</i> . 1994, c.23, s.30; 2001, c.32, s.31(2); 2006, c.23, s.22(3, 4); 2016, c. 25, Sched. 4, s. 8 (2).	A site plan will be submitted for townhouse dwellings and for the proposed seniors housing. Conceptual layouts and typical sizes for these blocks have been considered to ensure the size and configuration of the blocks are appropriate for approval at this time.

In conclusion, as set out above, the proposed Draft Plan of Subdivision meets the requirements of Section 51(24) of the Planning Act, conditional on the recommendations of the technical supportive studies.

5.3 Conclusion

Contingent on the approval of the active Official Plan Amendments and the implementation of the recommendations of the supporting studies, the proposed development represents good planning and is in the public interest. The proposed development provides a logical extension of the Elora-Salem area, and provides an appropriate form of housing that corresponds with the direction set out by the County and the Township.

The Proposed Development is in conformity with the in-effect and anticipated density targets and will contribute to meeting the growth needs within Centre Wellington. The

approval of the Proposed Development will result in the timely development of a logical and efficient urban form that is compact and compatible with the established community and will contribute to a complete community in this settlement area. The development is consistent with or conforms to relevant provincial and municipal policy and implements the policies of the County and the Township. On this basis, it is our opinion that the proposed development can be considered for approval.

Appendix 'A'

Pupil Yield Calculations based on 2024 Education Development Charges (EDC) Background Study

Pupil Yield Calculations

The 2024 Education Development Charges (EDC) Background Study, prepared by Watson & Associates, was reviewed for the purposes of determining the pupil generation as a result of the proposed development.

Based on the mapping within the EDC Background Study, the Subject Lands are within the WPE08 in the Salem PS catchment area, within WPS02 in the Centre Wellington DHS catchment area,

Table 9: Upper Grand District School Board - Public Elementary Pupil Yield

Upper Grand District School Board Public Elementary School Pupil Yield Calculation			
Development Type	Elementary Pupil Yield (Form E)	Proposed Units	Estimated Pupil Yield
Low Density	0.320	388	124.2
Medium Density	0.180	203	36.5
Total			160.7

Table 10: Upper Grand District School Board - Public Secondary Pupil Yield

Upper Grand District School Board Public Secondary School Pupil Yield Calculation			
Development Type	Elementary Pupil Yield (Form E)	Proposed Units	Estimated Pupil Yield
Low Density	0.150	388	58.2
Medium Density	0.057	203	11.6
Total			69.8

The Subject Lands are within CE06 in the catchment area for St. Mary's Catholic School (Elora) and are within CS02, which relies on neighbouring catchment areas.

Table 11: Wellington Catholic District School Board - Catholic Elementary Pupil Yield

Wellington Catholic District School Board Catholic Elementary School Pupil Yield Calculation			
Development Type	Elementary Pupil Yield (Form E)	Proposed Units	Estimated Pupil Yield
Low Density	0.118	388	45.8
Medium Density	0.069	203	14.0
Total			59.8

Table 12: Wellington Catholic District School Board - Catholic Secondary Pupil Yield

Wellington Catholic District School Board Catholic Secondary School Pupil Yield Calculation			
Development Type	Elementary Pupil Yield (Form E)	Proposed Units	Estimated Pupil Yield
Low Density	0.040	388	15.5
Medium Density	0.020	203	4.1
Total			19.6



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