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PLANNING JUSTIFICATION REPORT

6490 FIRST LINE &
8076 WELLINGTON ROAD 19
TOWNSHIP OF CENTRE WELLINGTON

JULY 2026
FILE #11630

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1. INTRODUCTION

Weston Consulting has been retained by RBS & EJS Fergus G.P. Inc., the registered owner of the lands municipally known as 6490 First Line and 8076 Wellington Road 19 in the Township of Centre Wellington (herein referred to as the "Subject Property") to provide professional planning services in support of a proposed residential development for the Subject Property.

In May 2024, Weston Consulting submitted a letter requesting a Settlement Area Boundary Expansion ("May 2024 SABE Request") to include the Subject Property within the Fergus Settlement Area Boundaries. The May 2024 SABE Request (SABR-020) addressed the expansion criteria in provincial policy documents prior to enactment of the Provincial Planning Statement 2024 ("PPS 2024"). As part of Urban Phase 3A of the County's Official Plan Review, Wellington County Council adopted Official Plan Amendment ("OPA") 126 on August 24, 2025.

OPA 126 identifies urban boundary expansions in Centre Wellington and addresses County-wide growth-related policy updates and other amendments. The Ministry of Municipal Affairs and Housing ("MMAH") approved OPA 126, subject to modifications, on November 18, 2025.

Through OPA 126 the Subject Property is now located within the Fergus Primary Urban Centre, Designated Greenfield Area (Schedule A1 County Growth Structure Centre Wellington). A Local OPA was submitted on April 9, 2026, and was deemed complete on May 11, 2026, to bring the Township's Official Plan into conformity with the County Official Plan, in accordance with OPA 126, and to permit residential development on the Subject Property. The application and supporting materials were prepared with regard for the Pre-Application Consultation ("PAC") Checklist requirements and comments from the Township, County, and other agencies and departments dated October 9, 2024.

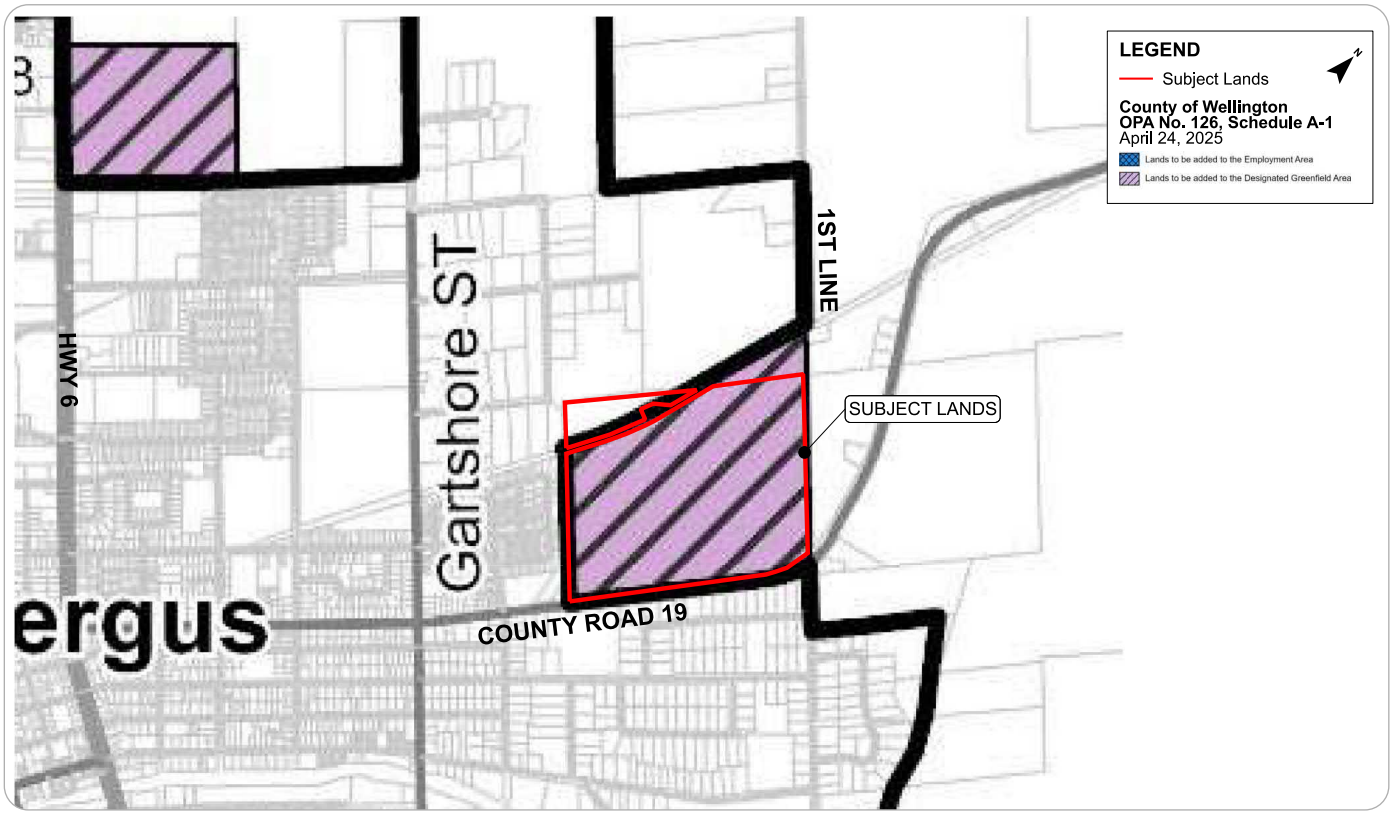

Figure 1: County of Wellington OPA 126 Schedule A-1

The Applications are now being submitted in support of a Zoning By-law Amendment and Draft Plan of Subdivision to permit a low-rise residential development on the Subject Property, contemplating single-detached dwellings and townhomes with site specific development standards. The Zoning By-law Amendment and Draft Plan of Subdivision applications and supporting materials constitute a complete application as described in Section 34 (10.1) and 51 (17) of the Planning Act.

This Report builds upon the Planning Justification Report submitted on April 9, 2026 as part of the Official Plan Amendment Application.

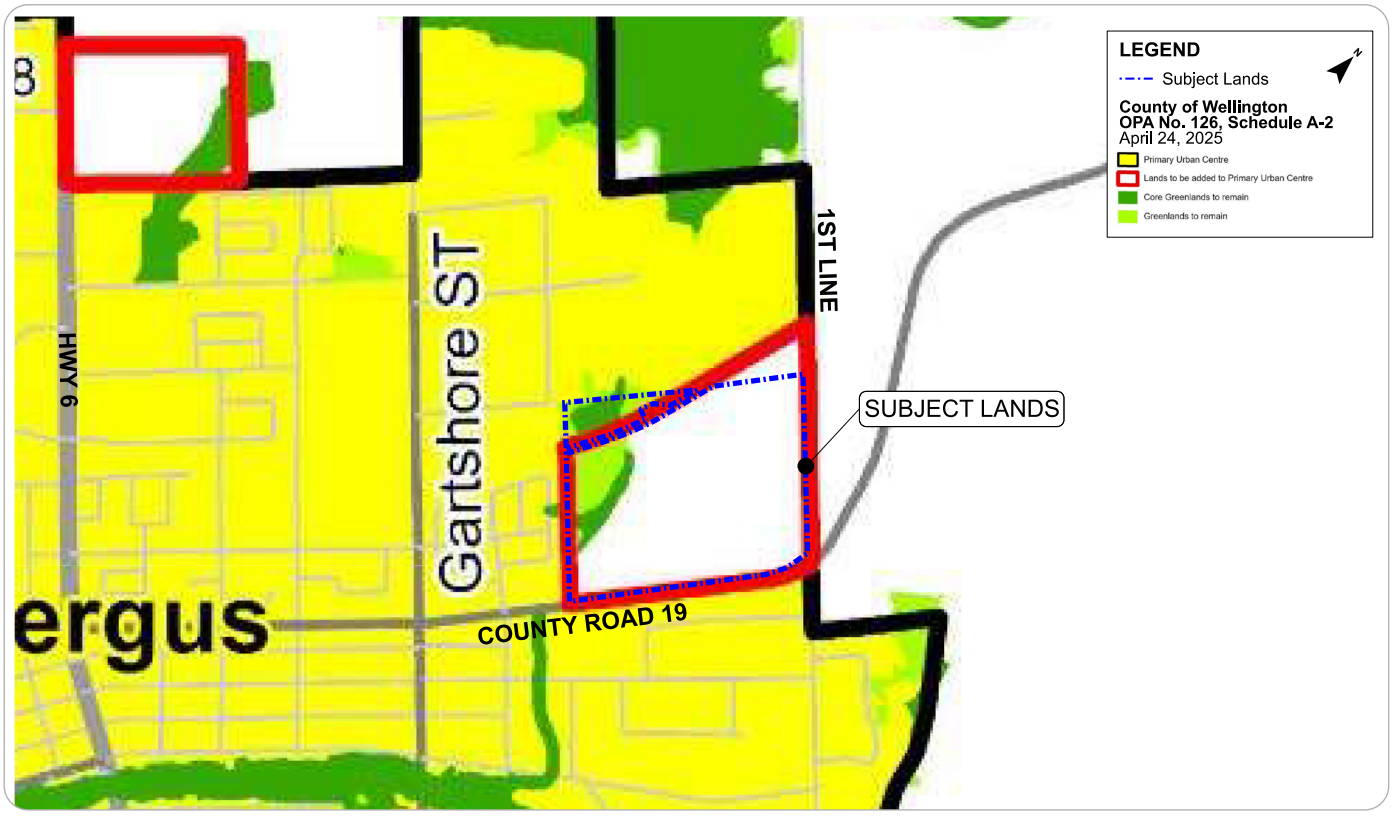

Figure 2: County of Wellington OPA 126 Schedule A-2

1.1 PURPOSE OF THE REPORT

The purpose of this Planning Justification Report is to outline the nature of the proposed development and evaluate the proposal in the context of the policies of the Planning Act, Provincial Planning Statement 2024, Wellington County Official Plan, the Township of Centre Wellington Official Plan, and the Township of Centre Wellington Comprehensive Zoning By-law 2009-045 and is intended to implement the site-specific OPA submitted in May 2026. The OPA seeks to designate the Subject Property as Residential, Core Greenlands and is within the Urban Boundary. This Planning Justification Report provides analysis and justification in accordance with good planning and design principles as the basis for the advancement of the proposed applications through the planning approval process. The evaluation of the proposed Zoning Bylaw Amendment and Draft Plan of Subdivision under the Township's Official Plan and Zoning By-law is further supported by comprehensive technical materials which are to be read in conjunction with this Report.

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2. SITE DESCRIPTION AND CONTEXT

Lot Description and Context

The Subject Property is approximately 39.1 hectares in size, rectangular in shape and has approximately 523 metres of frontage along First Line. The majority of the Subject Property is currently vacant. The Elora Cataract Trailway traverses through the Subject Property in a northeast/southwest direction, which divides the existing employment and residential uses in the vicinity. To the northwest of the trail are employment and industrial type uses, whereas southeast of the trail are residential uses. Two existing residential subdivisions abut the southwest and southeast of the Subject Property. Pockets of wooded areas are located adjacent to the trail, along the northwest portion of the Subject Property. Rural and agricultural uses are found in the area surrounding the Subject Property to the north and east. To the west of the Subject Property is an existing industrial area, which is divided by the existing rail corridor.

A portion of the Subject Property addressed as 8076 Wellington Road 19 is currently occupied by a heritage building recognized as the Skeoch Farmhouse. The heritage building is identified as a listed, non-designated property by the Township.

The Subject Property is legally described as follows:

6490 First Line

PT LT 8 CON 1 WEST GARAFRAXA PT 1, 61R11802 TOWNSHIP OF CENTRE WELLINGTON

8076 Wellington Road 19

PT LT 8 CON 1 WEST GARAFRAXA DESIGNATED AS PART 1 ON 61R21076 TOGETHER WITH AN EASEMENT OVER PT LT 8 CON 1 WEST GARAFRAXA DESIGNATED AS PART 2 ON 61R21076 AS IN RO713778 TOWNSHIP OF CENTRE WELLINGTON

Figure 3: Aerial Photo

Surrounding Land Uses

The following uses are within the vicinity of the Subject Property as outlined in Table 1.

Table 1: Surrounding Land Uses

North	North of the Subject Property are agricultural lots fronting onto First Line and employment uses closer to Gartshore Street. Further north beyond the urban boundary are agricultural properties.
South	Immediately south of the Subject Property is Garafraxa Street East/Wellington Road 19, followed by a low-rise residential subdivision comprised of single-detached dwellings and an elementary
East	Immediately to the east of the Subject Property is First Line. Further east are agricultural lots and the Belwood Lake Conservation Area.
West	West of the Subject Property are various employment uses and a large, vacant parcel toward Gartshore Street. Further west is an electric utility company and low-rise residential subdivisions.

Municipal Land Use Policies and Zoning

Schedule A1 (County Growth Structure Centre Wellington) designates the Subject Property as Primary Urban Centre and Designated Greenfield Area. The Subject Property is designated as Primary Urban Centre, Greenlands, and Core Greenlands per Schedule B1 (Land Use Centre Wellington) of the CWOP. Lands designated as Primary Urban Centre will provide a full range of land uses including residential uses of various densities commercial, industrial and institutional uses as well as parks and open space uses. The Subject Property is located outside of the existing Built Boundary.

The TCWOP designates a portion of the Subject Property as within the Fergus Urban Boundary and is designated as Industrial and Core Greenlands. The balance of the Subject Property south of the trail is currently outside of the Fergus Urban Boundary and therefore does not have a land use designation in the TCWOP. In the absence of a land use designation in the lower-tier municipal official plan, the in-force policies of the CWOP are determinative of the current land use permissions on the portion of the Subject Property south of the railway corridor at this time. The TCWOP has not yet been amended in accordance with County OPA 126.

The ZBL currently zones the Subject Property as Agricultural (A), Environmental Protection (EP), and Environmental Protection Overlay based on Schedule A Map 86. Development is generally not permitted within the noted zones. A Zoning By-law Amendment is being submitted to permit residential development on the Subject Property.

Transportation

The Township of Centre Wellington Official Plan identifies Wellington Road 19/Garafraxa Street East as an Arterial Road according to Schedule B (Road Classification). Frontage along First Line Road and Wellington Road 19/Garafraxa Street East will provide future vehicular access to the Subject Property to ensure connectivity and access to adjacent and surrounding lands.

Nearby Development Applications

This section provides a summary of select development applications for lands located in the nearby vicinity of the Subject Property to illustrate the type of development being contemplated in this area of the Township. These applications demonstrate how development within the Township is trending towards intensification and (re)development on underutilized parcels of land.

Table 2: Nearby Development Applications

#	Address	Application Type and File No.	Proposal	Status
1	6581 Highway 6	Official Plan Amendment OP005-2025 & Zoning By-law Amendment RZ004-2025	To include the land into the Fergus Urban Centre and redesignate to Residential for future residential development.	In process – not included in OPA 126
2	968 St. David Street North	Official Plan Amendment OP004-2025 & Zoning By-law Amendment RZ002-2025	To include the land into the Fergus Urban Centre and redesignate to Residential and Core Greenlands for future residential development.	In process – included in OPA 126
3	750 St. David Street North	Zoning By-law Amendment RZ04/24	To permit the construction of a stacked townhouse development consisting of 12 units.	Approved
4	73-79 Sideroad 19	Zoning By-law Amendment RZ006-24	To permit the development of semi-detached dwellings, cluster townhouse units and single-detached units.	In process
5	6586 Beatty Line North	Official Plan Amendment OP002-2025	To include the site within the Fergus Settlement Area and permit future the future development of townhouse and single-detached units.	In process – not included in OPA 126
6.	650 Victoria Terrace, Fergus	Official Plan Amendment: OP007-2025 & Zoning By Law Amendment: RZ006-2025	Official Plan Amendment - redesignate from industrial to residential . Rezoning from service industrial (M1) to residential mixed use (R6)	In process, public meeting occured
7.	820 St. David Street, Fergus	Draft Plan of Condo 23CD-23003	To facilitate a five storey mixed use building consisting of 5 commercial units and 45 residential units.	In process

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3. PROPOSED DEVELOPMENT

The enclosed Draft Plan of Subdivision for the Subject Property proposes 674 - 694 residential units, consisting of a mix of single-detached dwellings with varying frontages, and townhouses. A block containing the retained heritage house which will accommodate non-residential uses as shown on the Draft Plan of Subdivision prepared by Weston Consulting. The density range accounts for two potential frontages for the single detached dwelling lots. The Draft Plan contemplates Residential uses totalling 18.88 ha. The net developable area is 30.0 ha, of which 5% is contemplated to be allocated for parks and 5% for stormwater management. Site constraints, consisting of identified natural heritage features, comprise approximately 8.88 ha. The road network, stormwater management facilities, and natural heritage features have been guided by the supporting studies discussed in section 6 of this Report and have been refined for purposes of a draft plan of subdivision and zoning by-law amendment and following the since the April OPA submission.

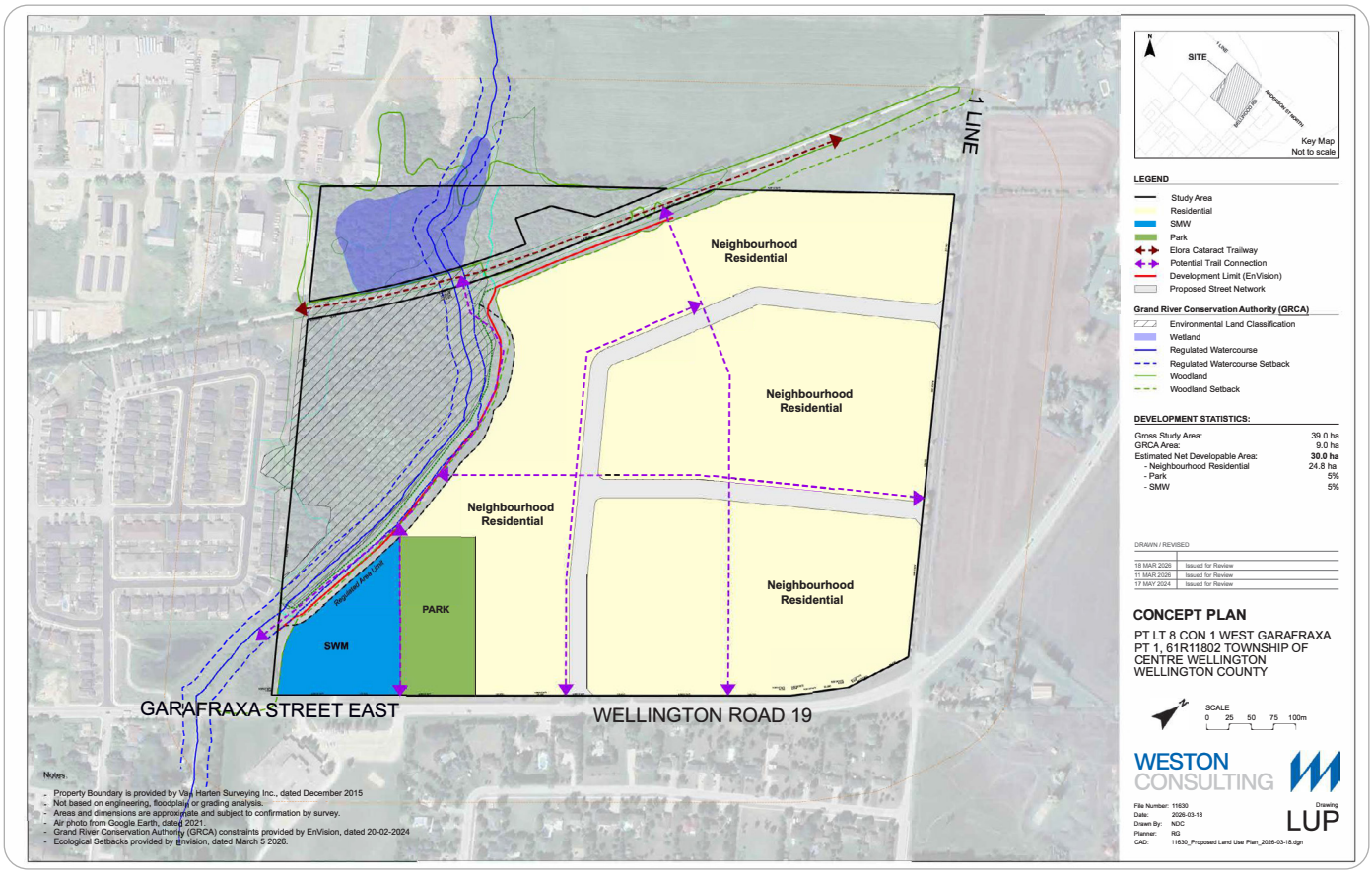

Figure 4: Concept Plan

Internal road connections are proposed to Wellington Road 19 and First Line to facilitate the efficient movement of vehicles, pedestrians, and cyclists. Potential trail connections are also proposed to provide for pedestrian and cyclist movements throughout the site, and to connect them to the adjacent streets and to the Elora Cataract Trailway. The proposed development will implement the County policy direction enacted through OPA 126.

Figure 5: Proposed Land Use Strategy

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4. DESCRIPTION OF PLANNING APPLICATIONS

4.1 ZONING BY-LAW AMENDMENT

A site specific Zoning By-law Amendment is being submitted to rezone the Subject Property from Agricultural (A) and Environmental Protection (EP) to Residential 2, Residential 3 and Residential 6 with site specific development standards and an open space. The proposed site specific zone exceptions include provisions to permit efficient and compact single detached dwellings, street townhouse dwellings, cluster townhouses (rear lane townhouses) and back to back townhouses. Cluster townhouses and back to back townhouses are not currently proposed but are included in the ZBA to allow for flexibility in the delivery of housing.

As set out in the submitted EIS prepared by EnVision, natural heritage features and the associated buffers are proposed to be designated Environmental Protection (EP) in order to restrict development and help mitigate environmental impacts.

The on-site stormwater management pond and parkland dedication have been placed in the Open Space (OS) zone.

4.2 DRAFT PLAN OF SUBDIVISION

This submission contemplates residential lots for two typologies, including street townhouse dwellings and single detached dwellings. The street townhouse lots contemplate 6 metre frontages. The single detached lots contemplate frontages of 11 metres and 12.2 metres, creating a range in the proposed density and varied dwelling types. The purpose of the density range is to provide flexibility to account for market changes in the future. The enclosed material prepared in support of the proposed development, including the Functional Servicing Report and Transportation Impact Study, has been prepared in consideration of the upper range of density to ensure the proposed development can be serviced regardless of the final build out.

The proposed Stormwater Management facility block is 1.5 hectares in size and the Environmental Protection Area block is 8.82 hectares in area. A 1.5 hectare Neighbourhood Park block is also provided that will contribute to the parkland dedication requirement.

The retained heritage house is situated on a lot approximately 0.14 hectares in area located in Block 46. The heritage house which is appropriately integrated into the proposed development through suitable setbacks, access, and lot configuration which preserve the heritage elements of the building on the property.

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5. PUBLIC CONSULTATION STRATEGY

In accordance with the requirements of the Planning Act, a Public Consultation Strategy is required for application undertaken as part of a public process. As such, the following strategy is provided in support of the proposed ZBA and DPS applications.

Once the application has been deemed complete, it is to be assigned a Statutory Public Meeting before the Committee of the Whole. Once the date is identified, a notice sign will be posted on the Subject Property within 20 days of the meeting as prescribed in Section 34 (14.3) of the Planning Act. The notice sign will articulate the date, time, and location of the public meeting, the applications submitted, the proposed development concept, and provide contact information for citizens wishing to submit written comments regarding the application.

In addition, Township staff will circulate meeting notices to property owners within 120 metres (400 feet) of the Subject Property. Notice will also be posted by the Township of Centre Wellington website and made available through local media postings.

An informal Public Open House could be held to provide the public with additional information about the proposed development in advance of or following the Statutory Public Meeting. The possibility of an informal meeting could be considered if the proposed application were to garner a high level of public interest. This informal Public Open House would be an opportunity to answer questions and further discuss the proposal.

At the Statutory Public meeting, all interested persons will be given the opportunity to express concerns and opinions by way of a deputation. All deputations will be made a matter of the public record.

The applicant will work with Township staff to address, to the extent possible, any and all concerns articulated at the Statutory Public Meeting. Comments and input received will be considered by the applicant and any appropriate revisions to the plans will be made through a re-submission.

The foregoing Public Consultation Strategy is in compliance with and exceeds provincial legislation. Weston Consulting is committed to facilitating the public engagement process.

The Wellington County Public Consultation Strategy Form is enclosed with this ZBA and DPS submission.

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6. SUPPORTING MATERIALS

A summary of the studies and reports provided in this submission is outlined in the following sections.

6.1 Functional Servicing and Stormwater Management Brief

Sabourin Kimble and Associates was retained by the applicant to provide a Functional Servicing and Stormwater Management brief. Based on the preliminary review it was determined that the site can be serviced from existing municipal water and wastewater systems. The report further finds that the subject property is a logical extension to the existing urban boundary as it is directly adjacent to the community. The proximity of the subject property to existing community lands allows for the property to easily be serviced from the existing water and wastewater infrastructure on Garafraxa Street. The findings of this brief have determined the proposed location and size of the stormwater management pond. Block 50 within the enclosed Draft Plan of Subdivision contains the SWM facility which will service the proposed development. SKA also summarizes the additional work that is required throughout the detailed design process.

6.2 Transportation Impact Study

BA Group was retained by the applicant to provide a Traffic Impact Study. The report concludes from the projections that traffic associated with the proposed development can be suitably accommodated at all intersections within the study area. The report also identifies potential improvements related to surrounding road connections which will be considered as the design advances. BA predicts that the proposed development will generate approximately 430 to 560 two-way vehicle trips during the AM and PM peal hours and can be appropriately accommodated through the proposed road network and connecting intersections. The proposed road network has been designed in accordance with the Centre Wellington Development Manual. TDM measures are also included in the Report to support the proposed development.

6.3 Heritage Impact Assessment

The Biglieri Group was retained by the applicant to complete a Heritage Impact Assessment given the presence of the historic Skeoch Farmhouse. The heritage building is recognized as a listed, non-designated property on the Township's Municipal heritage Register. The Heritage Impact Assessment determined that the building has physical design value as well as significance due to its association with early Fergus settlers. The outbuildings on the property are excluded from the heritage attributes. The HIA also provides mitigation and conservation measures to mitigate potential adverse impacts related to alteration, isolation, and land disturbances. No adverse impacts regarding destruction, shadowing, obstruction of views, or changes in land use were identified. The heritage dwelling is located in block 46 on the enclosed Draft Plan.

6.4 Environmental Impact Study

EnVision was retained by the applicant to complete an Environmental Impact Study. The study outlines the proposed development, documents the field investigations completed to assess potential environmental impacts, and recommends mitigation measures to protect and maintain the form and function of natural heritage features on and within the area of influence of the development. To guide the design of the Draft Plan, an overall limit to development was implemented to reduce potential impacts towards natural heritage features. The development limit includes an appropriate buffer from the ecological features. Appropriate mitigation measures are recommend to mitigate any adverse impacts caused by minor encroachments with the proposed development. The effects of development and the natural heritage features will continue to be assessed throughout the detailed design process.

6.5 Urban Design Brief

Weston Consulting was retained by the Owner to provide an Urban Design Brief in support of the enclosed ZBA and DPS applications. The Brief outlines the site's existing conditions, surrounding context, design rationale, and demonstrates how the proposed development responds to established principles and addresses applicable guidelines. The proposed low-rise subdivision will integrate itself within the Fergus Primary Urban Centre and is based on good urban design principles.

6.6 Hydrogeological Assessment

Soils Engineers Ltd. Consulting Engineers was retained by the Applicant to provide a Preliminary Hydrogeological Assessment.

The report identifies that the Subject Property is located within the Guelph Drumlin Field and is primarily characterized by glaciofluvial deposits, with portions of the site containing ice-contact stratified deposits. The Subject Site is located within the West Montrose-Grand River subwatershed and falls within the jurisdiction of the Grand River Conservation Authority.

The investigation confirmed that the site generally consists of silt, silty sand, sandy silt, and sandy silt till deposits beneath the topsoil. The observed groundwater data, including the seasonally high groundwater table will be used throughout the design and construction process to mitigate potential dewatering impacts and implement the appropriate monitoring and mitigation plans.

6.7 Stage 1 2 Archaeological Assessment

Archeoworks Inc. was retained by the Applicant to provide the Stage 1-2 Archaeological Assessment dated July 2007. Archeoworks Inc. has provided the finding that the Subject Property is considered free from archaeological concern. The Archaeological Assessment was filed with the Ministry of Citizenship and Multiculturalism with a letter from the Ministry dated July 22, 2008 confirming that there are no concerns from the Ministry. It is recommended by Archeoworks Inc. that development not proceed before receiving confirmation that the Ministry of Culture has entered the report into the provincial register of reports.

6.8 Geotechnical Investigation

Soils Engineers Ltd. Consulting Engineers was retained by the Applicant to provide the Geotechnical Investigation dated May 2026. Soils Engineers Ltd. Has provided the finding that the Subject Property is underlain by strata of sandy silt till, silt and sandy silt.

The recommendations indicate that topsoil, demolition debris, unsuitable fill, weathered soils, organics, and deleterious materials must be removed from construction areas and disposed of off-site where they cannot be reused appropriately. Existing fill and weathered soils are not suitable to support settlement-sensitive structures in their current condition and must be subexcavated and either sorted for reuse as engineered fill or removed. Proposed structures may be supported on conventional spread and strip footings founded on undisturbed native soils or engineered fill, with underground servicing to be constructed using appropriate bedding.

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7. PLANNING POLICY FRAMEWORK

7.1 THE PLANNING ACT R.S.O.C.P.13

The following section outlines the applicable land use planning policies and provides an evaluation of the proposed development in the context of the policy framework. The following policy documents have been considered in this report:

- *Planning Act, R.S.O 1990, c.P.13;*
- *Provincial Policy Statement (2024);*
- *County of Wellington Official Plan (December 2025 Office Consolidation);*
- *County of Wellington OPA 126;*
- *Township of Centre Wellington Official Plan (December 2024 Office Consolidation); and,*
- *Township of Centre Wellington Zoning By-law 2009-045 (the "ZBL").*

The Planning Act, R.S.O. 1990, C.P.13 (the Planning Act), is the central legislative document in the Province of Ontario which governs land use planning and development. The Planning Act sets out the framework for planning and provides a basis for decision-making by municipalities, planning boards, and other related bodies. The Planning Act ensures that land use planning decisions are made in the public interest, and promote sustainable, efficient, and effective land use and development practices. The following provisions of the Planning Act are of particular relevance to the proposed development, in the context of the submitted application.

In consideration of the proposed planning applications, Section 2 of the Planning Act must be considered as it provides the general direction for all land use planning decisions made in the Province of Ontario. The Report considers all elements under Section 2 and provides particular regard for policies a), e), f), h), h.1), j), l), m), o), p), and q).

a) The protection of ecological systems, including natural areas, features and functions;
e) The supply, efficient use and conversation of energy and water
f) The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
h) The orderly development of safe and healthy communities;
h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies
j) The adequate provision of a full range of housing, including affordable housing;
l) The co-ordination of planning activities of public bodies

m) The resolution of planning conflicts involving public and private interests
o) The appropriate location of growth and development
p) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians
q) The promotion of built form that,
i. Is well designed
ii. Encourages a sense of place
iii. Provides for public spaces that are of high quality, safe, accessible, attractive and vibrant

The regulations and direction of Section 2 of the Planning Act informs the Provincial Planning Statement and establishes matters of provincial interest, thereby ensuring that the Provincial Planning Statement addresses issues of consistency with Section 2 of the Act.

The planning analysis in this Report will demonstrate protection of ecological systems and features/functions; the efficient use of energy and water, servicing, sewage, waste management, communication and transportation infrastructure; the orderly development of safe and healthy communities that are accessible for persons with disabilities; the adequate provision of a full range of housing; coordination of planning activities of public bodies; the resolution of planning conflicts involving public and private interests; the appropriate location of growth and development; the promotion of pedestrian-friendly and transit-supportive development design; and the promotion of well-designed and high-quality built form.

In our opinion, the proposed OPA has appropriate regard for Section 2 of the Planning Act.

In accordance with Section 51(24) of the Planning Act, Draft Plan of Subdivisions shall have regard for the following, to ensure the health, safety and convenience of present and future inhabitants:

a) The effect of development of the proposed subdivision on matters of provincial interest, as referred to in Section 2;

The proposed development has been designed with regard for provincial interests as described in Section 2 of the Planning Act. The subsequent planning analysis sections as well as the supporting studies demonstrate this regard for provincial interest.

b) Whether the proposed subdivision is premature or in the public interest;

The proposed subdivision is not premature and is in the public interest. The Subject Property is located within the Urban Boundary and are therefore intended to accommodate urban growth and development as prescribed through County OPA 126. The proposal represents an appropriate and orderly form of development that makes efficient use of designated urban lands and contributes to the provision of additional housing supply. The subdivision has been planned in consideration of surrounding land uses, the planned road network, servicing requirements, and applicable policy direction, and can be appropriately implemented through the draft plan approval process and associated conditions.

c) Whether the plan conforms to the official plan and adjacent plans of subdivision, if any

The proposed ZBA and DPS applications are supported by a preceding OPA application to implement the direction of County OPA 126. Sections 7.3 and 7.4 of this Planning Justification Report demonstrate conformity with the relevant sections of the municipal Official Plan. The proposed plan of subdivision has also been designed to integrate with adjacent plans of subdivision through a coordinated road network, appropriate street connections, and a compatible development pattern.

d) The suitability of the land for the purposes of which it is to be subdivided

The Subject Property is suitable for the proposed subdivision, as the draft plan provides for low-rise residential dwellings on lots that are appropriately located and sized for the intended residential house-forms. The proposed lot fabric and road network support an orderly and compatible form of development that can be appropriately serviced and integrated with the surrounding area. The proposed subdivision includes appropriately sized blocks for stormwater management, as determined by the enclosed Functional Servicing and Stormwater Management Report, as well as parkland dedication in line with Planning Act requirements.

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 proposed road network has been design to integrate with the existing road network and trail system. Please refer to the Transportation Impact Study prepared by BA Group.

f) The dimensions and shapes of the proposed lots;

The dimensions and shapes of the proposed lots are appropriate for the intended low-rise residential uses. The proposed lots have been designed with sufficient frontage, depth, and area to accommodate the proposed dwellings, private amenity space, parking, access, and applicable zoning requirements as included in the enclosed Draft Zoning By-law Amendment. The lot configuration supports an efficient and orderly development pattern and is compatible with the surrounding residential lot fabric.

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 ZBA and DPS will facilitate a low-rise residential subdivision consisting of single-detached and townhouse dwellings as permitted through the enclosed Draft Zoning By-law. The development of the Subject Property can be appropriately implemented through the draft plan approval process and associated conditions.

h) Conservation of natural resources and flood control;

The development limits of the Subject Property have been determined in consultation with Envision Consultants and the associated Environmental Impact Study to ensure the conservation of natural resources and mitigate the risks associated with flooding.

i) The adequacy of utilities and municipal services;

Please refer to the Functional Servicing and Stormwater Management Brief prepared by SKA Consulting Group Limited, which indicates that the proposed development can be serviced with existing water and wastewater systems

j) The adequacy of school sites

The Subject Property is located adjacent to Maranatha Christian School and is approximately 2 kilometres north of John Black Public School.

k) The area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;

The proposed subdivision provides a 5% parkland dedication for public use. The subdivision also includes the required site triangles to be dedicated with the road network.

l) The extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy;

In our opinion, the proposed development has regard for Section 51(24) of the Planning Act. The proposed development provides a compact built form that efficiently utilizes land and infrastructure to accommodate urban residential growth. For the reasons listed above, it is our opinion that the proposed development has appropriate regard for the Planning Act.

7.2 PROVINCIAL PLANNING STATEMENT (2024)

On August 10, 2024, the Province released the new Provincial Planning Statement (PPS, 2024), which came into effect on October 20, 2024 and replaces the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. The PPS, 2024 integrates the PPS 2020 and the Growth Plan into a single, comprehensive provincial planning policy document. Similar to its predecessor, the PPS 2024 provides the overarching policy direction on matters of provincial interest related to land use planning and development throughout the Province of Ontario. The Subject Property is within a defined "Settlement Area" in accordance with the PPS, 2024.

Section 2.1 – Planning for People and Homes

Section 2.1 of the PPS 2024 outlines policies to provide for an appropriate supply, range, and mix of housing options and densities within the province. The following are applicable to the proposed OPA:

2.1.4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and

2.1.6. Planning authorities should support the achievement of complete communities by:

a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

Section 2.2 – Housing

Specific policies to plan for an appropriate range and mix of housing options are outlined under Section 2.2 of the PPS 2024. The PPS promotes and encourages a range and mix of housing types and densities that meet current and projected future housing needs. The following are applicable to the proposed OPA:

2.2.1. Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

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

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

The proposed ZBA and DPS will support the achievement of a complete community in Fergus by diversifying the mix of residential land uses; providing for a diverse range and mix of housing options in the form of low and medium density residential types; and accommodating new parks and open spaces for the residents' enjoyment. The proposed mix of low and medium density housing blocks will facilitate expanded housing options in Fergus that will assist in meeting the social, health, economic and wellbeing requirements of future residents.

As well, the proposal includes a compact built form that will achieve a minimum density of 56 residents and jobs combined per hectare for Designated Greenfield Areas in the County of Wellington Official Plan. Satisfying the County's minimum density target will ensure the efficient use of land, resources, infrastructure, and public service facilities, and supports the use of active transportation in conjunction with the proposed park blocks and street connections in accordance with the goals and objectives of the overarching PPS.

Section 2.3 – Settlement Areas and Settlement Area Boundary Expansions

Section 2.3.1 provides general policies for guiding growth and development within Settlement Areas and for expanding their boundaries in accordance with growth trends. The following are applicable to the applications:

2.3.1.1. Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.

2.3.1.2. Land use patterns within settlement areas should be based on densities and a mix of land uses which:

a) efficiently use land and resources;

b) optimize existing and planned infrastructure and public service facilities;

c) support active transportation;

d) are transit-supportive, as appropriate; and

The proposed ZBA and DPS would permit a compact development of low and medium density residential uses within the Fergus Settlement Area. In meeting the County's minimum density target of 56 residents and jobs combined per hectare for Designated Greenfield Areas, the proposed mix of residential blocks in the Draft Plan will efficiently utilize land and resources, optimize existing and planned infrastructure and public service facilities, support active transportation with the proposed park, and support future transit connections when available.

Section 2.3.2.1 of the PPS 2024 outlines policies that planning authorities shall consider in allowing a new Settlement Area or permitting expansions of existing Settlement Areas. The May 2024 SABE Request, PD2025-14 OPA 126 Recommendation Report, municipally and privately initiated supporting studies including but not limited to the Minimum Distance Separation Study, and Agricultural Impact Assessment for Centre Wellington, demonstrate that including the Subject Property wholly within the Urban Boundary satisfied section 2.3.2.1 of the PPS as well as the applicable sections of the CWOP and TCWOP, and fulfill the approved OPA 126.

Section 3.6 – Sewage, Water and Stormwater

Section 3.6 outlines the importance of making efficient use of existing infrastructure facilities. New development is mandated to be facilitated in a manner which makes efficient use and optimization of existing public infrastructure, including municipal water and sewage services. Policies 3.6.1, 3.6.2, and 3.6.8 speak to this need to efficiently utilize and optimize municipal water and sewage infrastructure, and to appropriately plan for stormwater management. It is our opinion, based on a preliminary review prepared by SKA, that the proposed residential density will efficiently utilize the existing municipal water and sewage infrastructure along Garafraxa Street East. A detailed Functional Servicing and Stormwater Management Report will be prepared by SKA to plan for on-site stormwater management and servicing at the appropriate time in the planning application process.

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

Policy 3.9.1 of the PPS 2024 outlines numerous sub-policies for promoting healthy, active, and inclusive communities through a variety of publicly-accessible recreational spaces. The following are applicable to the proposed ZBL and Draft Plan:

1. Healthy, active, and inclusive communities should be promoted by:

    a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;

    b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;

The proposed Draft Plan includes a street network and park blocks that locationally align with the existing and proposed trail connections to Wellington Road 19, First Line, and the Elora Cataract Trailway. This contemplated level of connectivity would help facilitate active transportation along with inter- and intra-community connectivity. As well, the proposed park and open space blocks will help provide outdoor, publicly-accessible recreational opportunities for persons of all ages and abilities. The proposed streets and parks will be designed to meet the municipal and provincial standards for ensuring pedestrian and vehicular safety through the detailed design stages.

Section 4.1 – Natural Heritage

The PPS 2024 outlines policies for protecting natural heritage resources in the Province for their economic, environmental, and social benefits for the long-term. The following policies are applicable to the proposed ZBA and DPS:

1. Natural features and areas shall be protected for the long term.

2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.

8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

According to the Ecological Assessment prepared by EnVision Consultants, the study identified natural heritage features on the Subject Property which include a GRCA-regulated wetland, a Significant Woodland, regulated unevaluated wetlands, and fish habitat. The proposed Residential blocks will avoid negative impacts on the noted features and their ecological functions given their location outside of the development limits delineated around each feature by EnVision Consultants.

Section 4.2 – Water

Section 4.2 of the PPS 2024 provides policies for protecting, improving, or restoring the quality and quantity of surface and ground water across the Province.

Policy 4.2.2. states that "Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches."

As earlier discussed, the proposed location of the Neighbourhood Residential blocks outside of the buffer areas around the GRCA-regulated wetland and regulated unevaluated wetlands will ensure the protection of these sensitive surface water features.

Summary

Based on our review of the applicable policies of the PPS, it is our opinion that the proposed development is consistent with the PPS. The proposed development will provide a mix of single detached and street townhouse units within a settlement area. This mix and range of unit types will provide options for future residents and increase the overall supply of housing in the Township and County, which will contribute to more attainable housing options. The Subject Property is mostly vacant, situated within an existing settlement area and adjacent to existing built-up neighbourhoods. As such, the Subject Property represents an appropriate location for growth and intensification in accordance with PPS policies and help achieve Provincial housing targets.

Based on the foregoing, it is our opinion that the proposed ZBA and DPS are consistent with the above policies of the PPS 2024.

7.3 COUNTY OF WELLINGTON OFFICIAL PLAN AMENDMENT 126

The County released a draft of OPA 126 on November 14, 2024 to identify potential additions to the Settlement Areas within Wellington that could accommodate an appropriate range and mix of land uses over the long-term. OPA 126 provides policy updates to support intensification, increase densities within Greenfield Areas, and determine appropriate phasing of growth and development across the County. OPA 126 was prepared following the adoption of the County OPAs 119, 120, and 123. Critically, OPA 126 identifies the southern portion of the Subject Property below the railway corridor for inclusion within the Fergus Settlement Area. County By-law 5928-25 to enact OPA 126 to the County Official Plan was adopted on April 24, 2025.

On November 18, 2025, the Ministry of Municipal Affairs and Housing approved County OPA 126 with three modifications related to land use compatibility and mineral aggregate resources. OPA 126 is in force and effect and the southern portion of the Subject Property is now included within the urban boundary.

7.4 COUNTY OF WELLINGTON OFFICIAL PLAN (DECEMBER 2025 OFFICE CONSOLIDATION)

The CWOP was adopted by Regional Council on September 24, 1998 and was later approved by the Minister of Municipal Affairs and Housing ("MMAH") on April 13, 1999. Since then, the CWOP has been amended numerous times. The CWOP discussed in this Report is the December 2025 Office Consolidation as amended by OPA 126.

Through the implementation of the Centre Wellington Urban Boundary Expansions at the County level, the Subject Property is part of the Fergus Primary Urban Centre and is designated Delineated Greenfield Area per Schedule A1 (County Growth Structure Centre Wellington) of the CWOP. The Subject Property is also designated as Primary Urban Centre, Core Greenlands, and Greenlands per Schedule B1 (Land Use Centre Wellington).

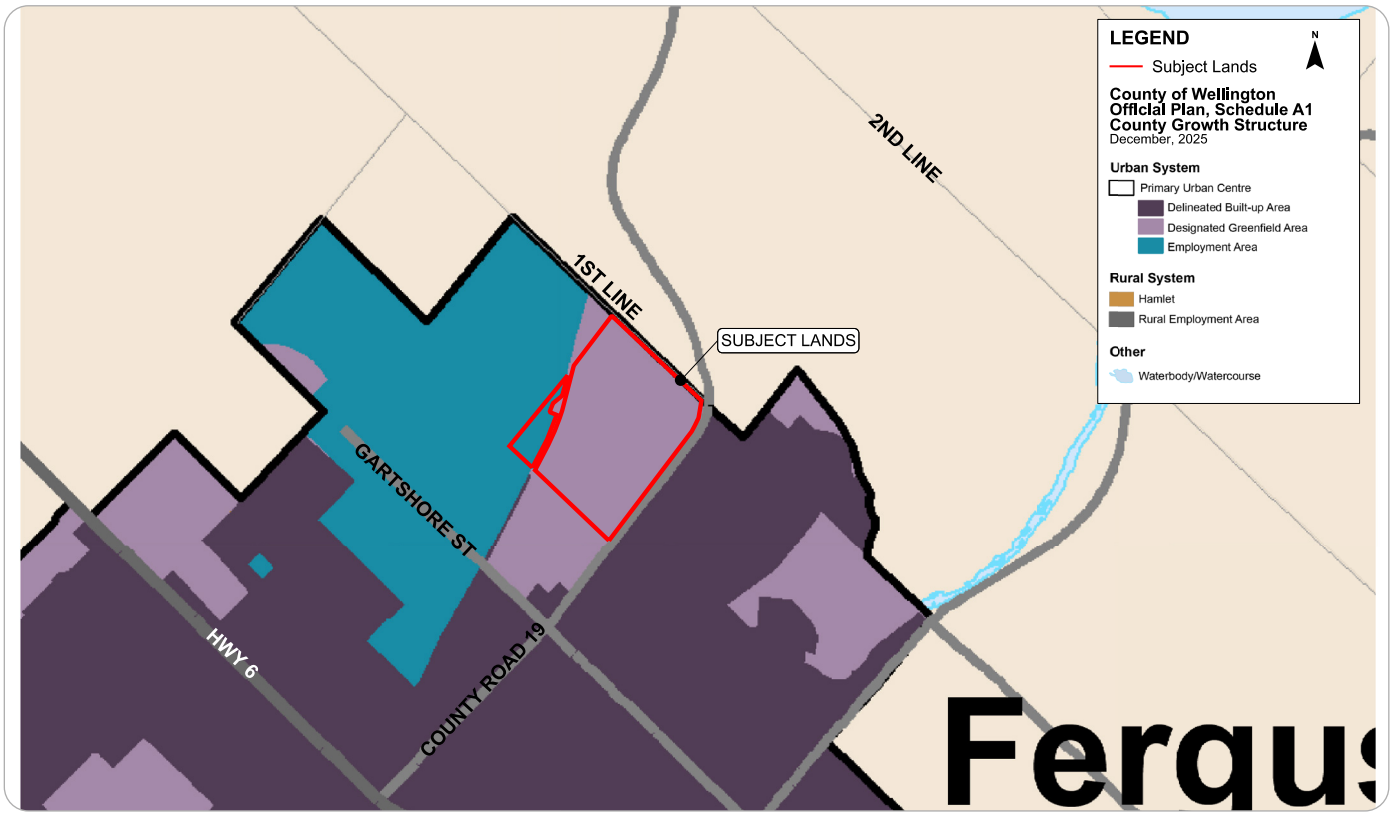

Figure 6: Schedule A1 of CWOP 2025

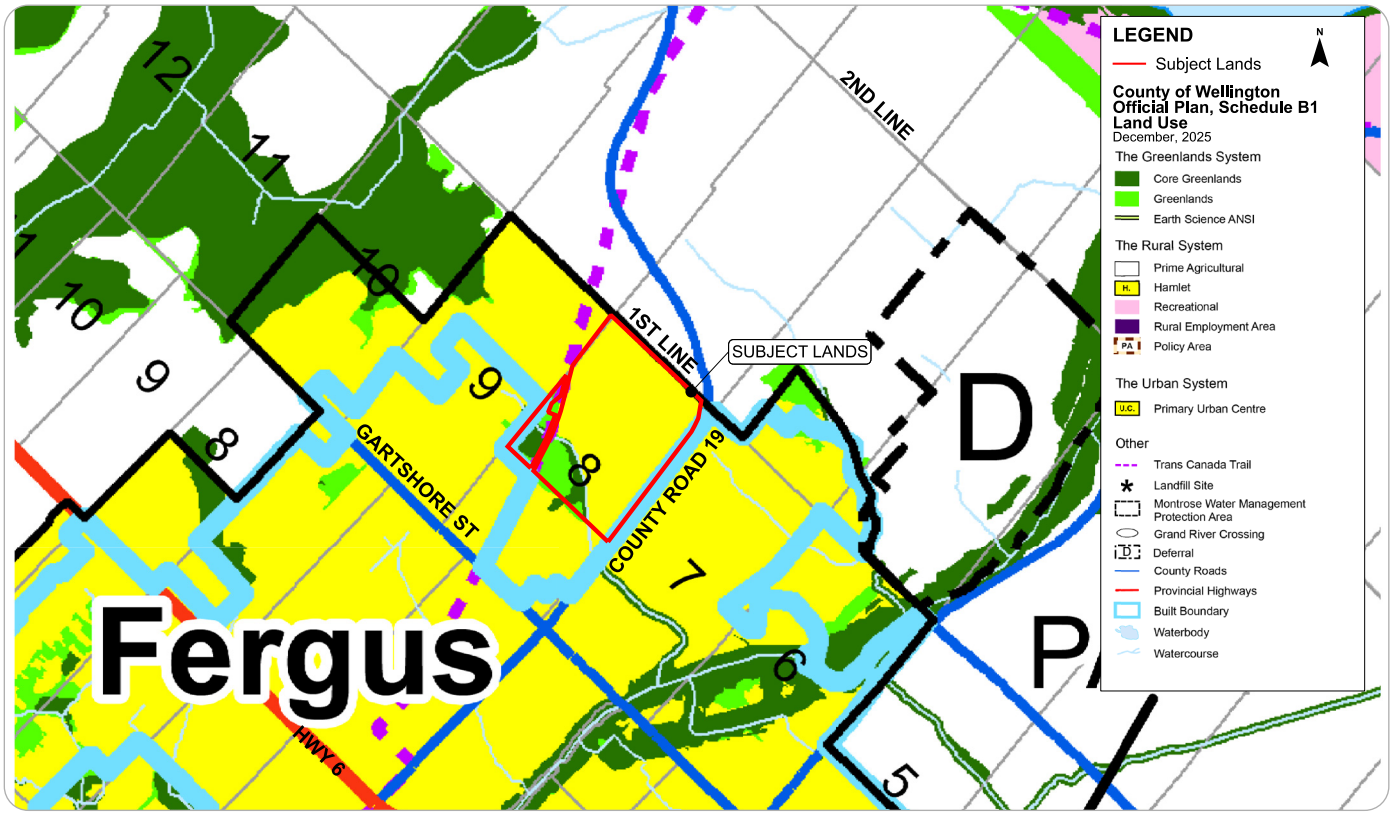

Figure 7: Schedule B1 of CWOP 2025

Part 2 – Wellington's Planning Vision

Part 2 of the CWOP outlines various fundamental beliefs and policy objectives, which situates the County within the context of its neighbours, the Province, and the broad systems of land that comprise Wellington. Section 2.1.1, Section 2.1.2, Section 2.1.4, Section 2.1.5, and Section 2.1.6 outline a broad Planning Vision for which planning decisions shall conform to, including the achievement of sustainable development, healthy communities, land stewardship, and complete communities.

Various planning policy objectives for the County are outlined under Section 2.2 of the CWOP. Policies 2.2.1, 2.2.2, 2.2.4, 2.2.7, 2.2.8, 2.2.9, 2.2.12, 2.2.13, 2.2.15, 2.2.21, and 2.2.22 are relevant to the proposed development. These noted policies broadly relate to achieving the 2051 population target, directing growth to serviced urban areas, providing opportunities for housing, developing cost and energy-efficient complete communities and land use patterns while maintaining the County's small town and rural character and protecting the natural heritage system, ensuring that development pays for growth-related costs, and broadening recreational and leisure opportunities.

Part 3 – Wellington Growth Strategy

Policies for projecting, guiding, servicing, and allocating growth in the County are outlined in Part 3 of the CWOP. Section 3.1 outlines the County's general strategy for accommodating growth and development, which includes encouraging development patterns that are cost-efficient, environmentally sound, and provide access to community services and facilities. The majority of growth is to be direct to Primary Urban Centres that have municipal water and sewage services, which include Designated Greenfield Areas.

Section 3.2 directs that 89% of the County's population growth will occur in 12 Primary Urban Centres. To guide this growth, Section 3.3 outlines numerous guiding objectives that include encouraging cost-effective development patterns, achieving complete communities through compact built forms that take advantage of existing infrastructures, encouraging growth in Primary Urban Centres and higher densities in Designated Greenfield Areas, and providing for a variety of housing types. Further to this, Lands added to the designated greenfield area of Fergus through Official Plan Amendment 126 will be planned to achieve an overall minimum density target of not less than 56 residents and jobs per hectare.

New development is encouraged to utilize municipal water and wastewater services to ensure the efficient and environmentally sound use of land per Section 3.4.

Section 3.5 allocates growth across the County and specifies that the population of Fergus Settlement Area is expected grow from 19,100 persons and 7,320 households in 2021 to 36,300 persons and 14,080 households by 2051.

The intent of Section 3.6 is to ensure that growth in designated greenfield areas and Primary Urban Centres occurs in a logical, coordinated, and orderly manner, aligned with approved planning frameworks and the timely provision of municipal servicing and infrastructure. The policy is intended to sequence development so that complete, fully serviced community and employment areas are substantially built out before additional lands are brought forward, while allowing agricultural uses to continue until urban development is required.

The proposed ZBA and DPS will facilitate the efficient utilization of the existing municipal servicing infrastructure in a compact built form to provide for a greater variety of housing types in the Fergus Settlement Area. The proposed low and medium-density residential blocks will achieve the minimum density target for Designated Greenfield Areas and assist the County in meeting its growth target for Fergus by 2051. By providing for a compact built form with varied housing types, vehicular and trail connections to the abutting streets, and a park that logically interfaces with the elementary school south of Garafraxa Street East, the development will assist in achieving a complete community in Fergus.

Part 4 – General County Policies

Part 4 of the CWOP outlines general policies pertaining to the protection and enhancement of cultural heritage resources, economic development, farmland protection, housing, human-made hazards, impact assessments, urban area protection, expansion of settlement areas, protection of water resources, watershed plans, public and open spaces, and community improvement. The following are relevant to the proposed development:

Section 4.1, Cultural Heritage and Archaeological Resources, pertains to built heritage, cultural heritage landscapes and archaeological resources. A Heritage Impact Assessment has been prepared in support of the proposed change to Draft Plan and ZBL. Refer to the HIA prepared by the Biglieri Group for a full assessment of the cultural heritage resources on site and mitigation measures for development.

4.4.1 Supply

The County will ensure that residential growth can be accommodated for a minimum of 15 years through residential intensification, redevelopment and if necessary, lands which are designated and available for new residential development.

The County will maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.

4.4.2 Variety

The County will provide for a variety of housing types to satisfy the present and future social, health and well-being requirements of residents of the regional market area. New residential developments will be promoted at densities which efficiently use available servicing and are appropriate to site conditions and existing patterns of development. New multiple lots or units for residential development will incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

4.4.3 Residential Intensification

This Plan contains policies encouraging residential intensification in primary urban centres. The strategic approach to residential intensification intends to retain small town character and revitalize downtown areas which includes:

> a) supporting increased densities in newly developing designated greenfield areas with a broader mix of housing types than has been the norm in small towns;
> j) ensuring that adequate infrastructure is, or will be, established to serve the anticipated development.

4.4.4 Greenfield Housing

In designated greenfield areas, the County will encourage increased densities and a broader mix of housing and will:

> b) require new developments to achieve densities which promote the overall designated greenfield area density target of a minimum of 40 persons and jobs per hectare and specifically:
>
> > i) attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions;
> > ii) somewhat lower densities may be considered in newly developing subdivisions where physical and environmental constraints such as larger than normal storm water management requirements, parcel dimensions that do not yield efficient lotting patterns and the need for transition areas from adjacent land uses, or on small parcels of under 2 hectares (5 acres);
>
> v) encourage the introduction of medium density housing types in new subdivisions and other designated greenfield areas.

The proposed ZBA and DPS will assist the County in meeting its residential growth targets, as modified through OPA 126, while providing for a greater variety of housing types than has been the norm in small towns within a Designated Greenfield Area. The proposed development contemplates a variety of single detached and townhouse built forms. The Subject Property will be developed to meet the minimum density target for Designated Greenfield Areas to efficiently utilize existing servicing infrastructure with consideration for the existing environmental constraints. The proposed Multiple Residential block will also help introduce a medium density housing type in the Designated Greenfield Area.

4.7 URBAN AREA PROTECTION

4.7.1 Distinct Urban-Rural Boundary
In order to allow the efficient expansion of urban areas, and to maintain a clear distinction between urban and rural areas, the County of Wellington:

> *a) prohibits new development adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion (adjacent will normally mean within 1 kilometre of an urban area boundary);*

Section 4.8.2 of the CWOP outlines criteria for considering such SABE requests as part of a municipal comprehensive review. An analysis of Section 4.8.2 was provided in the May 2024 SABE Request.

Technical studies were prepared in support of the May 2024 SABE Request , including a Functional Servicing and Stormwater Management Brief prepared by SKA, an Ecological Assessment prepared by EnVision Consulting and an Agricultural Characterization Report (ACR) prepared by Colville Consulting, which demonstrate conformity with Section 4.8.2. These technical studies conclude that the Subject Property can be serviced from the

existing municipal water and wastewater system and that the Subject Property is a suitable location for a SABE with respect to considerations related to the agricultural base. As mentioned above, through OPA 126, the Subject Property is now part of the Fergus settlement area and is designated the appropriate designations for residential development in accordance with the submitted Concept Plan.

Part 5 – The Greenland System

The CWOP outlines policies for defining, maintaining, and enhancing the Greenlands System across the County in Part 5. The purpose of the Greenlands System is to ensure that natural heritage features and areas are maintained for their natural beauty, to reduce exposure to unsafe conditions, for their recreational and economic value, and their spiritual value in relation to human health and well-being. The following policies are relevant to the proposed ZBA and DPS :

5.4.1 Wetlands

All wetlands in the County of Wellington are included in the Core Greenlands. Development and site alteration will not be permitted in wetlands which are considered provincially significant. Provincially Significant Wetlands are shown in Appendix 3 of this Plan. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted. The appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland.

5.5.4 Woodlands

In the Urban System, woodlands over 1 hectare are considered to be significant by the County and are included in the Greenlands System. Woodlands of this size are important due to their economic, visual and environmental contributions to the urban landscape.

Detailed studies such as environmental impact assessments may be used to identify, delineate and evaluate the significance of woodlands based on other criteria such as: proximity to watercourses, wetlands, or other woodlands; linkage functions; age of the stand or individual trees; presence of endangered or threatened species; or overall species composition. Significant woodlands will be protected from development or site alterations which would negatively impact the woodlands or their ecological functions. Good forestry practices will be encouraged and tree removal shall be subject to the Wellington County Forest Conservation Bylaw.

5.6.2 Development Impacts

Where development is proposed in the Greenland system or on adjacent lands, the County or local municipality shall require the developer to:

a) identify the nature of the features potentially impacted by the development;
b) prepare, where required, an environmental impact assessment to ensure that the requirements of this Plan will be met, and consider enhancement of the natural area where appropriate and reasonable.
c) address any other relevant requirements set out in Section 4.6.3 Environmental Impact Assessment.

No development will be approved unless the County is satisfied that the Greenland and Environmental Impact Assessment policies are met.

5.6.3 Adjacent Lands

For the purposes of this section of the Plan, adjacent lands are considered to be:

a) lands within 120 metres of Provincially Significant Wetlands, provincially significant Life Science Areas of Natural and Scientific Interest, significant habitat of endangered and threatened species, fish habitat, significant wildlife habitat, significant valleylands, and significant woodlands.
c) lands within 30 metres of all other Core Greenlands and Greenland areas
.

5.6.4 Zoning

Core Greenland areas shall be placed in a restrictive zone which prohibits buildings, structures and site alterations except as may be necessary for the management or maintenance of the natural environment. Other greenlands may also be given a restrictive zoning by a municipal council.

Zoning by-laws may also recognize existing land uses in core greenlands and, where appropriate, provide for reasonable expansions or alterations. Zoning by-laws may also establish setbacks from Core Greenland areas in which no buildings or structures shall be permitted.

The Subject Property contains a GRCA-regulated wetland, a Significant Woodland, regulated unevaluated wetlands, and fish habitat as identified in the Ecological Assessment prepared by EnVision Consultants in accordance with the policies of Section 4.6.3 (Environmental Impact Assessment). The proposed development is situated adjacent to each of the noted features and outside of the associated buffers as delineated by EnVision Consultants. As a result, the GRCA-regulated wetland, a Significant Woodland, regulated unevaluated wetlands, and fish habitat will be maintained and protected in conformity with the policies of Part 5.

The noted natural heritage features and their associated buffers will be placed in the Environmental Protection Zone to prohibit future development within these areas.

Part 7 - The Urban System

Part 7 of the CWOP outlines policies for directing and accommodating growth within the Urban System of the County. Per Section 7.1 and 7.2, the Urban System includes Primary Urban Centres which are anticipated to accommodate the majority of new development and population growth that will be serviced by municipal water and wastewater infrastructure. Growth and change will be managed to retain the small-town character of Wellington and to achieve “healthy, complete, efficient, and sustainable communities.” The following policies are applicable to the proposed ZBA and DPS:

7.3 PLANNING APPROACH

Development based on municipal services which promote environmental protection and efficient land use will be encouraged.

Land use patterns in the urban system shall be based on:

a) densities and a mix of land uses which:
i) efficiently use land and resources;
ii) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; and

7.4 PRIMARY URBAN CENTRES

7.4.1 Permitted Uses

Primary urban centres are expected to provide a full range of land use opportunities. Residential uses of various types and densities, commercial, industrial and institutional uses as well as parks and open

space uses will be permitted where compatible and where services are available. More detailed official plan designations and policies as well as zoning regulations will identify the location and nature of various permitted uses in primary urban centres.

7.4.2 Services

Sewage and water services will be provided in accordance with Section 11.2 of this Plan. Road access will be via internal roads where possible, then via local roads where possible and then via County Roads or Provincial Highways where there is no other alternative. In all cases, appropriate sighting standards must be met and road functions maintained.

7.4.5 Residential Use

Primary urban centres shall provide a broad range of residential uses to provide a diverse supply of housing, including affordable housing. Wellington will plan for a diverse range and mix of housing options, densities, and unit sizes on full municipal services.

7.4.12 Parks and Open Space

Primary urban centres shall provide adequate parks and open space areas to serve their population and may provide recreational opportunities for a larger regional population. Parks and open space areas may be located in or adjacent to greenland areas depending on impacts and opportunities.

7.4.13 Greenlands System

The Greenland System policies established in this Plan apply within primary urban centre. More detailed policies may be developed for primary urban centres, particularly where urban development is adjacent to Greenland System areas or where existing development has already occurred in or near Greenland System areas.

The proposed ZBA and DPS will provide for a mix of low and medium-density residential uses that will meet the minimum density target for Designated Greenfield Areas and efficiently utilize land and the existing municipal servicing infrastructure. The proposed mix of low and medium-density residential types will broaden the range of residential land uses in the Primary Urban Centre and contribute to a more diverse range and mix of housing options, densities, and sizes on full municipal services. The proposed park block will serve the local residents of the proposed development. Matters of conformity with the Greenlands Systems policies were discussed in Part 5 of the CWOP. Overall, it is our opinion that the proposed ZBA and DPS conform to the policies of Part 7.

Part 8 – Detailed Primary and Secondary Urban Centre Policies

Part 8 of the CWOP outlines detailed land use policies for all urban centres in the plan. They are intended to recognize and reinforce the role of urban centres as central places in Wellington with a small town character. Numerous vision statements and policy objectives are outlined under Section 8.1.3 and 8.1.4 pertaining to the urban centres, which include maintaining Wellington's small town character, preserving the single-detached home as the dominant housing form while diversifying the variety of housing types, protecting the natural environment (including the Greenland System), providing opportunities for an adequate supply and diversity of housing to meet the needs of the County, balancing development with environmental protection, and ensuring the adequate provision of parkland.

We have considered the policies under Part 8 with respect to the proposed ZBA and DPS. Part 8 provides detailed land use policies for the Residential, Central Business District, Residential Transition Area, Highway Commercial, Industrial, Recreational, and

Greenlands designations. The Fergus Settlement Area is designated as Primary Urban Centre and does not have a more detailed land use designation per Schedule B1 (Land Use Centre Wellington) that would warrant a detailed discussion of the policies of Part 8.

OPA 126 resulted in the inclusion of the Subject Property within the Primary Urban Centre, the policies of which were addressed in our discussion of Part 7. With respect to the Core Greenlands on the Subject Property, we have considered the applicable detailed policies in our discussion of Part 5 of the CWOP. In doing so, the proposed ZBA and DPS will also achieve the objectives for Greenlands under Section 8.9.2 regarding protection of the natural environment for their ecological, economic, and social values.

Part 10 - Creating New Lots

Part 10 of the CWOP provides direction and items for consideration when creating new lots. As per section 10.1.2 - Subdivision Required, a Draft Plan of Subdivision is required to facilitate the proposed development consisting of 674 - 694 residential lots. The proposed development has been designed with consideration towards urban design, environmental, transportation, servicing, as well as the surrounding context and conforms to the considerations included in section 10.1.3 and 10.1.4.

Summary

We have reviewed and considered all sections of the CWOP, and determined that the following policies are applicable and are addressed in this review:

- Part 2 (Wellington's Planning Vision) – 2.1.1, 2.1.2, 2.1.4, 2.1.5, 2.2.1, 2.2.2, 2.2.4, 2.2.7, 2.2.8, 2.2.9, 2.2.12, 2.2.13, 2.2.15, 2.2.21, and 2.2.22;
- Part 3 (Wellington Growth Strategy) – 3.1, 3.2, and 3.5;
- Part 4 (General County Policies) – 4.4.1, 4.4.2, 4.4.3, 4.4.4, 4.7.1 a), and 4.8.2;
- Part 5 (The Greenland System) – 5.4.1, 5.5.3, 5.6.3, and 5.6.4;
- Part 7 (The Urban System) – 7.3 a) i) ii), 7.4.1, 7.4.2, 7.4.5, 7.4.12, and 7.4.13; ,
- Part 8 (Detailed Primary and Secondary Urban Centre Policies) – 8.9.2; and
- Part 10 (Creating New Lots) - 10.1

Based on the foregoing, it is our opinion that the proposed ZBA and DPS conform to the above policies and the CWOP. The proposed development will implement the policy objectives of OPA 126 and as intended for a property located within a Primary Urban Centre, Designated Greenfield Area and is based on good planning principles.

7.5 TOWNSHIP OF CENTRE WELLINGTON OFFICIAL PLAN (DECEMBER 2024 OFFICE CONSOLIDATION)

The TCWOP is intended to guide, manage and direct growth and development within the Township of Centre Wellington. Township Council adopted the Official Plan on November 24, 2003 and it was approved by the OMB on May 31, 2006. The most recent Office Consolidation includes various OPAs up to December 2024. The Township is working with the County of Wellington to review and evaluate locations for urban expansion in Centre Wellington. It is anticipated that the Township will update the TCWOP through an official plan review process at a later date.

As per the current TCWOP, a portion of the Subject Property below the railway corridor is currently not located within the Fergus Urban Boundary and therefore does not have a land use designation in the TCWOP. The proposed OPA would designate this portion of the Subject Property as Residential and within the Urban Boundary on Schedule A-1 (Land Use Plan Fergus, Elora-Salem) in order to implement the County's Urban Boundary Expansion and permit residential development on the Subject Property, the policies of which we have considered in our discussion of the TCWOP.

The submitted OPA will also designate a portion of the Subject Property to Core Greenlands on Schedule A-1 to ensure the protection of the on-site natural heritage features. Thus, policies pertaining to the Core Greenlands are considered in our analysis.

A.1 - Purpose and Intent of the Plan

Section A.1 of the TCWOP outlines the purpose and intent of the plan, which provides direction for all future planning activities. The purpose of the TCWOP includes coordinating the effects of change and future development in consideration of the Township's long-term interests, to guide future municipal decisions and expenditures regarding infrastructure, to provide the basis for future zoning regulations and standards, and to maintain the Township's position as a desirable place to live, work, and play and learn.

B.4 - Major Goals

The major goals of the TCWOP with respect to guiding and directing growth and development in the Township are outlined under Section B.4. Several applicable major goals with respect to the proposed development include protecting the Township's natural resources, providing opportunities for housing, broadening the supply and diversity of housing, ensuring the adequate provision of parks and open spaces, and providing improved municipal services and community facilities to serve residents. By conforming to the policies of the TCWOP, the proposed ZBA and DPS will achieve these major goals.

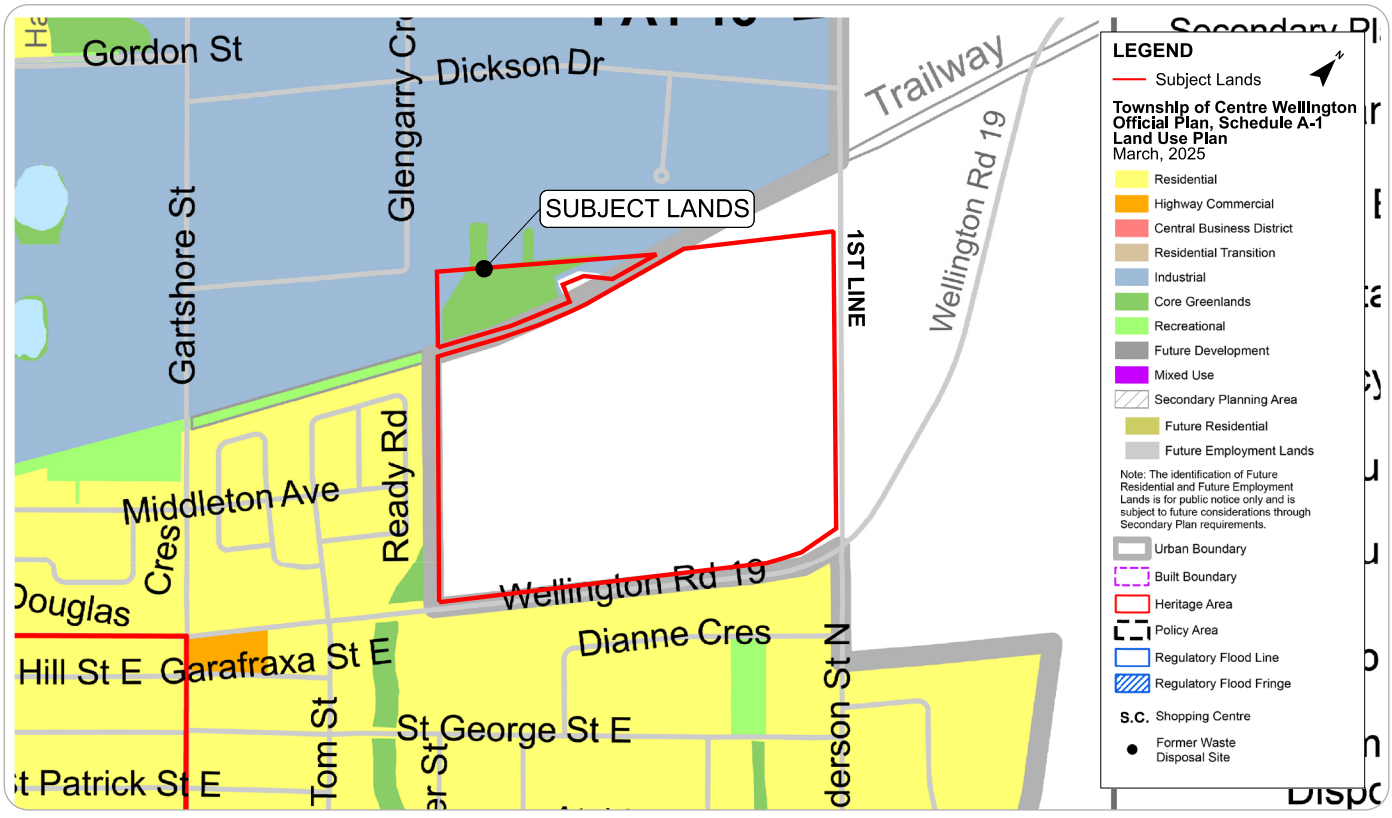

Figure 8: Schedule A-1 of TCWOP 2024

B.5 - Urban Area Expansion

Section B.5 of the Official Plan establishes criteria for a settlement area boundary expansion. These policies have been reviewed in our May 2024 SABE Request letter and previous PJR dated April 2026 submitted as part of the OPA application for the Subject Property.

Including the Subject Property within the TCWOP Fergus Urban Boundary will bring the Subject Property into conformity with County OPA 126 and has appropriate regard for the SABE criteria contained in the TCWOP.

Section C - General Policies

Section C of the TCWOP outlines policies that apply to all development and land use designations. The purpose of these general policies is to outline policies for protecting cultural heritage, natural heritage, and ground and surface water resources, and to guide growth and development at a high-level. The following are applicable to the proposed Draft Plan and ZBL:

C.2 Cultural Heritage Resources

Section C.2 pertains to the goals and objectives regarding cultural heritage resources as well as the designation of heritage properties. Section 3.5 of the HIA prepared by the Biglieri Group contains an assessment of these policies. We have reviewed the HIA and believe the application conforms to the relevant cultural heritage policies of the TCWOP.

C.3.1 Overview

The Township of Centre Wellington encourages the protection and enhancement of the natural heritage of the Township. When planning for the future of Centre Wellington, the Township will give consideration to the protection, preservation and enhancement of significant natural features including rivers and streams and their valley lands, wetlands, flood plains, headwaters and water catchment areas, ground water supplies, environmentally significant features, wildlife and fish habitats and lands with ecological functions. This applies regardless of whether the lands are designated Core Greenlands on the land use schedules.

Within the Natural Heritage System certain areas have greater sensitivity or significance. These areas will be identified in policy and protected. These areas have been included in a Core Greenlands designation on the land use schedules and include:

- Provincially Significant Wetlands
- Habitat of endangered or threatened species
- Floodways and hazardous lands

Specific policies for the Core Greenlands land use designation are found in Section D.8. The following policies apply to natural heritage issues in general, including lands and features that may not presently be designated on the land use schedules.

C.3.2 Wetlands

All provincially and locally significant wetlands are included in the Core Greenlands designation. The Township recognizes the hydrological, social, ecological and economic value of wetlands and their role within the natural environment. All other wetlands will be protected in large measure and development that would seriously impair their future ecological functions will not be permitted.

2. The interpretation and definition of the limits of locally significant wetlands and lands adjacent to those wetlands will be the responsibility of the Township, the Conservation Authority and any other agency or person(s) so requested by the Township.

C.3.5 Fisheries Policies

The Township of Centre Wellington recognizes the importance of the Grand River and its tributaries as a unique and significant local resource. The Grand River is a significant fishery resource, capable of supporting 12 coolwater or coldwater fish species such as trout. Development within the Township shall have regard for the following:

6. Where a proposed development may affect fishery resources, Council shall, where deemed necessary, require the proponent to submit an Environmental Impact Assessment pursuant to Section E.1.3.

C.3.9 Woodlands

The Core Greenlands designation may include wooded areas, particularly where these are also associated with other Natural Heritage features such as wetlands. Otherwise, the Core Greenlands designation includes only upland woodlands over 10 hectares in area. These woodlands will be protected from development or site alterations that would negatively impact the woodlands or their ecological functions. Good forestry practices will be encouraged.

The Township also recognizes that smaller wooded areas also have local significance. Wooded areas contribute to erosion control, groundwater storage and wildlife habitat. Where practical, these smaller woodlots should be protected, even if they are not included in the Core Greenlands designation

The Township adopts the following policies with respect to its wooded areas:

1. The Township encourages the protection and preservation of existing trees and woodlots;

3. In instances where a development proposal may impact upon a significant woodlot, the Township will require that an Environmental Impact Assessment in accordance with Section E.1.3 be undertaken. However the Assessment should also address the following issues particular to an examination of the impact on a woodlot:

f) Recommend no development where negative impacts of development cannot be mitigated due to the rarity, sensitivity or size of the woodlot.

According to the Ecological Assessment prepared by EnVision Consultants, the study identified natural heritage features on the Subject Property which include a GRCA-regulated wetland, a Significant Woodland, regulated unevaluated wetlands, and fish habitat. The proposed Core Greenlands designation will ensure the protection of the noted features given the blocks' location outside of the development limits delineated around each feature by EnVision Consultants.

C.5 HOUSING POLICIES

C.5.1 Variety of Housing

The Township of Centre Wellington encourages the production of a wide range of housing types to meet future housing need. Council shall provide for the opportunity, through subdivision approval and zoning bylaw approvals, for a variety of housing types to be provided. Prior to approving new development or redevelopment, Council will consider the housing need within the community and the housing market area and provide opportunities for a range of housing types throughout the community that are appropriate given existing site conditions, neighbouring developments, and servicing options.

C.5.2 Supply of Residential Land

The Township of Centre Wellington shall, as long as land is available within the Urban Centre limits, maintain a minimum ten (10) year supply of residentially designated land within each Urban

Area at all times. The Township of Centre Wellington adopts as a guideline the maintenance of a minimum three- (3) year supply of housing units in registered and draft approved plans of subdivision, and applications approved

C.5.5 Residential Intensification

This Plan contains policies encouraging intensification primarily in the urban centres. The strategic approach to intensification intends to retain small town character and revitalize downtown areas which includes:

a) supporting increased densities in newly developing greenfield areas with a broader mix of housing types than has been the norm in small towns;

C.5.6 Greenfield Housing

In Greenfield areas, the Township will encourage increased densities and a broader mix of housing and will:

1. encourage approved but undeveloped plans of subdivision to consider revisions which add additional housing units in appropriate locations;

2. require new developments to achieve densities which promote the overall greenfield density target of 40 persons and jobs per hectare and specifically:

i. strive to attain at least 16 units per gross hectare (6.5 units per gross acre) in newly developing subdivisions;

ii. somewhat lower densities may be considered in newly developing subdivisions where physical and environmental constraints such as larger than normal storm water management requirements, parcel dimensions that do not yield efficient lotting patterns and the need for transition areas from adjacent land uses, or on small parcels of under 2 hectares (5 acres);

iii. In (i) and (ii) above gross hectares or gross acres means residential land excluding environmentally protected features and non-residential uses (schools, convenience commercial) but includes roads, parks, storm water management areas or other utility blocks; and

3. encourage the introduction of medium density housing types in new subdivisions and other Greenfield areas.

The proposed development will assist the Township in meeting its residential growth targets while providing for a greater variety of housing types than has been the norm in small towns within a Greenfield. The ZBA will introduce site specific zoning provisions in order to implement compact residential built forms, through a variety of unit types, that will contribute towards the prescribed residential growth targets.

C.6 MUNICIPAL SERVICES

C.6.1 General Servicing Policies

1. All new development and redevelopment within the Fergus and Elora-Salem Urban Centres shall be provided with full municipal services, to such standards as may be required by the Township, including:

a) Sanitary sewage disposal facilities
b) Water supply facilities
c) Storm drainage facilities
d) Hydro
e) Public roads
f) Telecommunications

2. Telephone, cable television and natural gas services will be provided to all new development, wherever feasible and appropriate,

C.6.2 Provision of Sewer and Water Services

The Fergus and Elora-Salem Urban Centres have municipal sewer and water services. 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 EloraSalem Urban Centres.

C.6.5 Sanitary Sewage Collection and Treatment

C.6.5.2 Connection

All new development in the Fergus and EloraSalem Urban Centres shall be connected to the municipal sanitary sewage system except where this Plan provides a specific exemption. The system and its various components and appurtenances are permitted in all land use designations of this Plan.

C.6.6 Water Supply and Distribution

C.6.6.2 Connection

All new development within the Fergus and Elora-Salem Urban Centres shall be connected to the municipal water supply system except where this Plan provides for specific exemptions. The system and its various components and appurtenances are permitted in all land use designations of this Plan.

The proposed development is intended with the full utilization of municipal water and wastewater servicing infrastructure via the future connections planned along Garafraxa Street East. The Functional Servicing Report & Stormwater Management Brief prepared by SKA confirms that the Subject Property can be serviced by the existing servicing infrastructure. Hydro, public roads, and telecommunication will be designed and approved for inclusion within the Subject Property as part of the development approvals process.

C.12 Parkland

Section C.12.1 requires that 5% of the land area proposed for residential development be dedicated for parkland. The proposed development will include on-site parkland dedication in accordance with the Planning Act.

Section C.15 of the TCWOP outlines broad design policies and design guidelines to achieve higher standards in the physical design of the built and natural environment in its Urban Centres. The policies and guidelines in this section are considered in section 5 of the Urban Design Brief prepared by Weston Consulting, enclosed with this submission.

Section D – Detailed Land Use Policies

Detailed land use policies are provided in Section D of the TCWOP. Section D.2 outlines objectives and policies regarding the Residential designation that is proposed for the Subject Property as part of the proposed ZBA and DPS. Section D.2.1 states that "The single-detached home is currently the dominant housing type in the urban centres and this situation is expected to continue. However, new housing types are needed to provide a greater variety of residential accommodation as well as a more affordable housing supply. The Municipal Plan anticipates that semi-detached, townhouse and apartment dwellings will be developed to respond to this need and that these units may eventually account for at least one quarter of all housing units in Fergus and Elora-Salem where full municipal services are available."

The following objectives and policies are applicable to the proposed ZBA and DPS:

D.2.2 Objectives For Residential Development

1. To ensure that an adequate supply of land is available to accommodate anticipated population growth over the planning period;

2. To provide a variety of dwelling types to satisfy a broad range of residential requirements including affordable housing;

3. To manage the rate of growth and the amount of residential development within the urban centres in order to maintain and enhance the small town character;

6. To minimize potential compatibility issues between residential and other land uses;

5. To ensure that an adequate level of municipal services will be available to all residential areas;

7. To encourage intensification, development proposals provided they maintain the stability and character of existing neighbourhoods;

D.2.3 Permitted Uses

The predominant use of land in those areas designated RESIDENTIAL on Schedule "A" of the Plan shall be residential development. A variety of housing types shall be allowed, but low rise and low-density housing forms such as single-detached and semi-detached dwelling units shall continue to predominate.

Townhouses and apartments, bed and breakfast establishments, group homes and nursing homes, may also be allowed subject to the requirements of the Zoning By-law and the applicable policies of this Plan.

In addition, non-residential uses such as schools, churches, clinics, local convenience stores, home occupations, neighbourhood parks and other public facilities may also be permitted within the RESIDENTIAL designation subject to the appropriate Zoning By-law regulations and the policies of the Municipal plan.

D.2.4 Low-Density Development

This Plan considers single-detached, semidetached and duplex dwellings to be low density housing forms. 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.

D.2.5 Medium Density Development

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 following criteria are satisfactorily met:

1. 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.

2. 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;

3. That the site of the proposed development has a suitable area and shape to provide:

a) 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;

b) On-site amenity areas for the occupants of the residential units;

c) Adequate off-street parking, access and appropriate circulation for vehicular traffic, particularly emergency vehicles; and

d) Adequate grading to ensure that drainage from the property is directed to public storm drainage facilities and not to adjoining properties.

4. That adequate services such as water, sewage disposal, storm water, roads and hydro are available or shall be made available to service the development;

6. 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.

7. That a separate zone(s) is established for multiple residential developments.

The proposed ZBA and DPS will facilitate the proposed urban-type development of low and medium-density residential uses on the Subject Property that will be fully serviced by municipal services in the Greenfield area. This proposed urban-type development will assist the Township in accommodating its forecasted population growth and provide for a more diverse range of housing types. Based on the Wellington County End Year 2025 Population Estimates, Fergus averages 2.58 people per unit, resulting in an estimated 58 people and jobs per hectare, based on the latest Draft Plan of Subdivision.

The building and site design and layout conforms to the policies under Section D.2.5 of the TCWOP to ensure compatibility with existing/future nearby developments, pleasing visual appearances, adequate on-site parking & traffic functionality, and adequate grading.

D.8 CORE GREENLANDS

D.8.1 Planning Approach

General policies applying to the natural heritage of our community are found in Section C.2 of this Plan. In addition, the land use schedules also incorporate a Core Greenlands land use designation. This designation is a composite of Provincially Significant Wetlands, the habitat of endangered or threatened species and floodways and hazardous lands. The following policies specifically apply to the Core Greenlands designation. They should be read in conjunction with Section C.3.

D.8.2 Permitted Uses

Upon lands designated Core Greenlands, no development or site alteration is permitted within Provincially Significant Wetlands, in provincially significant portions of the habitat of threatened or endangered species, or in the floodway. Uses shall be limited to conservation and resource management, open space and passive recreation. Such uses shall only be permitted where it can be demonstrated that:

1. There are no negative impacts on provincially significant features and functions and no significant negative impacts on other natural heritage features and functions;

2. Any natural hazards present can safely be overcome;

3. The development conforms to policies of the applicable adjacent or underlying designation permitted to continue

D.8.3 Zoning

Lands designated Core Greenlands shall 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.

Zoning by-laws may recognize existing land uses in Core Greenlands areas, and, where appropriate, provide for reasonable expansions or alterations.

Zoning by-laws may also establish setbacks from Core Greenlands areas in which no buildings or structures shall be permitted.

D.8.4 Adjacent Lands

For the purposes of this section of the Plan, adjacent lands are considered to be lands within 120 metres of Provincially Significant Wetlands; and/or lands within 30 metres of all other Core Greenlands areas.

The proposed development will be situated outside of the development limits established around the GRCA-regulated wetland, a Significant Woodland, regulated unevaluated wetlands, and fish habitat. Therefore, the proposed development will occur adjacent to the Core Greenlands, ensuring that there are no negative impacts to the wetlands and their functions. The Core Greenlands are proposed to be zoned Environmental Protection in order to prohibit development and respect the natural features and their associated buffers. The delineation of the Environmental Protection Zone has been determined through the Environmental Report prepared by Envision Consultants.

E.9 Lot Creation and Land Division

Section E.9 contains policies pertaining to lot creation and land division, including Draft Plans of Subdivision. As per policy E.9.1 the proposed development is required to proceed via Draft Plan of Subdivision. Section E.9.2 contains the following approval criteria which has been considered in the enclosed applications:

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

2. Necessary services, utilities, and community facilities can be provided to
the proposed subdivision.

3. The proposed plan of subdivision will not
negatively affect transportation networks,abutting land uses, and other features of the natural or built environment.

4. The proposed plan of subdivision is not
considered to be premature, and is within
the public interest.

5. The proposed plan of subdivision is compatible with the existing built form of the Township, including adjacent land uses and road patterns.

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.

The proposed Draft Plan of Subdivision will facilitate low density and medium density residential development on full municipal services in conformity with the general policies of the OP as well as the land use designations contained in section D.2.4, D.2.5 and D. 8. Technical studies have been prepared in support of the proposed development and provide further justification with regards to Transportation and Servicing matters. The Draft Plan of Subdivision has been designed with an interconnected street network to facilitate the movement of vehicles and pedestrians.

The variety of housing types, including single detached dwellings and street houses, will diversify the existing housing stock, contribute to the overall supply of housing, and provide choices for future and existing residents. The mix of housing types will also contribute to increased density in a location
that is considered appropriate for residential intensification.

The traditional forms of buildings in the existing built-up area will be respected in the proposed development through architectural expressions and materiality inspired by the existing neighbourhood. The scale of the proposed development will be compatible with that of the neighbouring area to the south and west, with the proposed built form, heights, and building placement to ensure a pedestrian-friendly, human-scaled environment.

Summary

We have reviewed and considered all sections of the TCWOP, and determined that the following policies are applicable and addressed in this review:

- Section A.1 – Purpose and Intent of the Plan;
- Section B.4 – Major Goals;
- Section B.5 – Urban Area Expansion;
- Section C – General Policies: C.3.1, C.3.2, C.5.1, C.5.2, C.5.5, C.5.6, C.6.1, C.6.2, C.6.5.2, and C.6.6.2; and,
- Section D – Detailed Land Use Policies: D.2.2.1, D.2.2.2, D.2.2.5, D.2.3, D.2.4, D.2.5.1, D.2.5.2, D.2.5.3, D.2.5.4, D.2.5.6, D.2.5.7, D.8.1, D.8.2, D.8.3, and D.8.4.
- Section E.9 - Lot Creation and Land Division: E.9.1, E.9.2

In our opinion, the proposed development conforms to the general policies of the OP in recognition that a site specific OPA has been submitted and will be implemented to facilitate the proposed Draft Plan and Zoning By-law Amendment applications.. The proposed development will provide a diversity of housing options in the Township. The townhouse and single detached house forms are permitted within the Residential designation. Furthermore, the proposed development contributes to the creation of a complete community by offering a mix of housing types and integrating parkland and trails, which enhances livability and supports the Township's objectives for housing diversity and community connectivity. Technical reports have been prepared in support of the proposed changes. Based on the foregoing, it is our opinion that the proposed ZBA and DPS conforms to the above policies and the TCWOP. The ZBA and Draft Plan applications will facilitate the Urban Residential Land Use permissions granted through OPA 126 and included in the site specific OPA application that was previously submitted for the Subject Property.

7.6 TOWNSHIP OF CENTRE WELLINGTON ZONING BY-LAW 2009-045

The Township of Centre Wellington Zoning By-law 2009-045 (the "ZBL") is a by-law regulating the use of lands and the character, location, and use of buildings and structures within the Township. The Zoning By-Law came into force in 2009 and consolidates and incorporates amendments enacted by Township Council and the Ontario Municipal Board that are in full force and effect as of February 2024. The Zoning By-Law divides the Township into zones, each with their own set of land use permissions and performance standards regulating development.

The ZBL zones the Subject Property as Agricultural (A), Environmental Protection (EP), and Environmental Protection Overlay per Schedule A Map 86. A Zoning By-Law Amendment is required to permit the proposed development with site-specific performance standards. The proposed ZBA incorporates reduced minimum lot areas, lot frontages, and yard setbacks to facilitate a compact and efficient residential built form. The zoning standards have been carefully established to accommodate an appropriate number of lots within each block while supporting the market-driven housing types proposed for the development. These provisions ensure that individual lots remain functional and livable, while also regulating the spatial relationship between dwellings through appropriate setback requirements.

The enclosed Zoning By-law amendment seeks to rezone the Subject Property as Residential 2, Residential 3 and Residential 6. The Residential 2 and 3 zones will accommodate a range of single-detached and townhouse dwellings. The Residential 6 zone seeks to permit a range of non-residential uses within the existing Heritage dwelling.

Figure 9: Schedule A. ZBL 2009-045 Map 86

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8. PLANNING ANALYSIS AND JUSTIFICATION

8.1 LOGICAL AND EFFICIENT SETTLEMENT AREA BOUNDARY EXPANSION

Our research and analysis lead us to conclude that the proposed development considers the applicable policy regime, applies sound planning principles, and facilitates the implementation of the Provincial, County, and Municipal policy framework. Therefore, the proposal will facilitate a compact development consisting of single-detached and townhouse blocks which constitutes “good planning” and is thus appropriate on the Subject Property. The proposed development represents good planning and is in the public interest, in so much as it:

- Implements the inclusion of the lands within the Fergus Settlement Area, as prescribed through County OPA 126;
- Contributes to the creation of a complete community;
- Optimizes the efficient use of existing municipal servicing infrastructure and public amenities; and,
- Protects the natural heritage system;

It is our opinion that the proposed ZBA and DPS will implement a logical and efficient expansion of the Fergus Settlement Area as prescribed through OPA 126 and as further implemented through the site specific OPA. Urban-type residential development on the site would represent an extension of the existing urban boundary that could be accommodated with the existing infrastructure along Garafraxa Street East, noting the recent upgrades to the sanitary sewer that were intended to accommodate the future development of the Subject Property. Thus, the proposed development will logically and efficiently utilize the existing nearby municipal services in a manner that will minimize expansion costs to the Township. Moreover, our analysis implements OPA 126 to include the Subject Property within the Fergus Settlement Area, and would contribute 39.1 gross hectares (30.1 net hectares) to meet the County's 611 hectares and Township's 452 hectares of Community Area land needs per the Community Area Land Needs Assessment prepared by Parcel Economics Inc. Furthermore, it must be recognized that only the net developable area of the Subject Property (30.1 hectares) can contribute to the County's overall land needs, and the net area is less than the site's gross area (39.1 hectares). Therefore, the site's net developable area contributes to a smaller percentage of the County's overall land needs compared to the site's gross area, which provides for additional land opportunities for urban expansion in other parts of the County.

8.2 CREATION OF A COMPLETE COMMUNITY

It is our opinion the proposed development contributes to the creation of a complete community within the Township of Centre Wellington. The proposed ZBA and DPS will provide for a greater range and mix of housing types, sizes, tenures, widths and elevations through the proposed mix of low-rise houseforms. These unit typologies will provide additional housing options in the Township that will accommodate households of varying incomes, ages, and structures, thereby helping to ensure that residents will be able to work and live within the Township at all stages of their life. The proposed site specific zoning provisions allow for a compact and efficient low-rise residential development based on industry practices. The ZBA and DPS are structured to allow for flexibility and adapt to shifting market conditions through a variety of houseforms. This, along with the interconnected street network proposed, will help create interesting, varied, and active transportation-friendly streetscapes on the Subject Property that logically interfaces with the nearby elementary school.

8.3 OPTIMIZED AND EFFICIENT USE OF EXISTING INFRASTRUCTURE

The Subject Property is proposed to be developed for low density residential uses that will meet the minimum density target of 56 jobs and persons combined per hectare for Designated Greenfield Areas as per the CWOP. Accordingly, this proposed applications will appropriately maximize the efficient use of municipal water, wastewater, and stormwater infrastructure. Specifically, the proposed ZBA and DPS will efficiently utilize the existing nearby municipal services along Garafraxa Street East in a manner that will minimize expansion costs to the Township. The proposed street connections to First Line and Wellington Road 19/Garafraxa Street East will also facilitate the efficient use of transportation infrastructure and nearby amenities such as parks, schools, and community centres. The result will be the avoidance of any unjustified or uneconomical upgrades, improvements, or additions to municipal infrastructure in relation to the proposed development.

8.4 PROTECTION OF THE NATURAL HERITAGE SYSTEM

The proposed development, ZBA and DPS will ensure the protection of the natural heritage system. Development on the Subject Property will occur adjacent to the on-site wetlands, woodland, and fish habitat, and are proposed outside of the development limits established around each feature by EnVision Consultants in their Ecological Assessment. The site specific OPA will designate these features and their development limits in the Core Greenlands designation to ensure their continued protection from a policy perspective. The proposed ZBA will place these lands within a restrictive Environmental Protection zone.

8.5 DENSITY

The proposed development includes an appropriate density for the Subject Property and greater community of Fergus. The proposed development envisions approximately 675 – 695 units within a settlement area, supporting provincial housing objectives and that will contribute to the growth targets for Centre Wellington, Wellington County, and the Province of Ontario. The proposed development includes a density of approximately 58 people per hectare which will support the minimum 56 residents and jobs per hectare target for the County of Wellington. In order to vary housing typologies, a compact built form is being proposed. The inclusion of townhouses and varied unit typologies also addresses affordability and market demand while meeting Provincial growth targets. By increasing the supply of housing and contributing to the overall mix of house forms we are providing more options for residents at all stages of life as the variety of units being proposed allows for more attainable housing options for more household types.

The proposed mix of housing typologies shown on the Draft Plan meets the policy requirements of the Township of Centre Wellington. The lot fabric and scale of the single detached units represent a more compact and efficient form than what currently exists. Both housing types are permitted within the proposed Residential designation.

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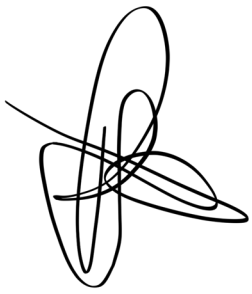
9. CONCLUSION

The proposed development of the Subject Property considers the applicable policy regime, applies sound planning principles, facilitates the implementation of the provincial and County policy framework and supports the intent of the Centre Wellington Official Plan. In our opinion, the application represents an opportunity for quality residential development in Fergus. The proposed development represents good planning and is in the public interest in that it:

- Has regard for the relevant sections of the Planning Act;
- Is consistent with the Provincial Planning Statement;
- Implements OPA 126 and through the site specific OPA will achieve conformity with the Township's OP;
- Represents a compact built form that efficiently utilizes municipal services while protecting the natural environment.

Based on the analysis contained within this Planning Justification Report, it is our opinion the proposed development represents good planning and should be approved.



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