

Final

# Planning Justification Report 1060 Queens Bush Road, Township of Wellesley

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Zoning By-Law Amendment Application

# OF WELLESLEY

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# 1 Introduction

On behalf of our client, Bradley & Co., please accept this Planning Justification Report (hereinafter referred to as “Report”) in support of their request to amend the Zoning By-Law to support the proposed development of the property municipally known as 1060 Queens Bush Road, in the village of Wellesley, and the Township of Wellesley.

Our client is proposing to redevelop the subject property with a new residential building comprised of 12 stacked Townhouse units. The proposed residential building will have a height of two-storey building (maximum of 9 metres). To permit the proposed townhouse use on the subject property, a Zoning By-Law Amendment is required to amend the current zoning from UR to UR2 with Site Specific Provisions as follows:

- Permit “Stacked Townhouse Dwellings” in addition to the uses outlined in Provision 11.1 of the Zoning By-Law;
- Permit a minimum Lot Area of 154 m<sup>2</sup> for “Stacked Townhouse Dwellings”, whereas 175 m<sup>2</sup> is required;
- Permit a minimum Front Yard depth of 4.5 metres, whereas the Zoning By-Law requires 6.0 metres; and
- Permit a minimum Exterior Side Yard depth of 4.5 metres, whereas the Zoning By-Law requires 6.0 metres.

Please accept this Report and supporting material in support of the proposed Zoning By-Law Amendment Application. The proposed Zoning By-Law Amendment will provide for Stacked Townhouses as a permitted use, a reduced Lot Area and Front/Exterior Side Yard setbacks.

Based on the review of the applicable land use policies and regulations, the proposed Zoning By-Law Amendment has regard for the “Matters of Provincial Interest” as defined by the Planning Act, is “consistent” with the Provincial Policy Statement, is in conformity with the Growth Plan for the Greater Golden Horseshoe, the Region of Waterloo Official Plan, the Township of Wellesley Official Plan and Zoning By-Law.

Further, it is our opinion that the proposed development makes efficient use of the existing urbanized land, existing municipal infrastructure and contributes adding to the housing stock. Based on the foregoing, it is our opinion that the proposed development represents good planning and is appropriate for the subject property and surrounding area.

# 2 Site Location and Context

The subject property is municipally known as 1060 Queens Bush Road and legally identified as Part of Lot 12, Concession 1, East Section in the Township of Wellesley. The property is located on the southeast corner of the intersection of Queens Bush Road and Village Road.

The subject property is currently developed with a single detached, one-storey dwelling; a detached two-car garage and a small shed. Driveway access from the garage leads out to both Queens Bush Road and Village Road. There are mature trees on and/or close to the rear and interior side property boundaries, and three trees located in the Queens Bush Road right-of way beyond the front property boundary.

An existing chain link fence runs along the length of the abutting property to the east (Bell property) and one of the abutting properties the south has a wooden fence around its rear yard.

Wellesley Public School is located opposite on the north side of Queens Bush Road. Abutting the property to the east is an undeveloped Lot containing a Bell Utility Service structure. The remaining surrounding area is developed with low-rise residential dwellings, mainly single detached Lots (refer to Figures 1 to 7 inclusive, below).



**Figure 1** – Aerial image of subject property, outlined in red. (Source: Region of Waterloo GIS Mapping, aerial image 2022)



**Figure 2** – Photograph of Subject Property looking south from Queens Bush Road (taken by Arcadis IBI Group, February 1, 2023)





**Figure 3** – Photograph of exterior side-yard of Subject Property looking southeast from corner of Queens Bush Road and Village Road (Source: Arcadis IBI Group, February 1, 2023)



**Figure 4** – Photograph of rear of Subject Property looking east from Village Road (Source: Arcadis IBI Group, February 1, 2023)





**Figure 5** – Photograph of interior side yard of Subject Property looking south from Queens Bush Road  
(Source: Arcadis IBI Group, February 1, 2023)



**Figure 6** – Photograph of Queens Bush Road, looking east towards Greenwood Hill Road from the intersection with Village Road (Source: Arcadis IBI Group February 1, 2023)





**Figure 7** – Photograph of Queens Bush Road, looking west from the entrance to Wellesley Public School  
(Source: Arcadis IBI Group, February 1, 2023)

### 3 Proposed Development

Our client proposes to demolish the existing dwelling and structures and redevelop a new building that will provide for 12 stacked Townhouse units. The height of the two-storey building will be a maximum of 9 metres and be located with a proposed setback of 4.5 metres from both street fronting property boundaries and 7.5 metres from the rear lot line. Each unit will have its own external entrance, some facing Village Road, some facing the internal side yard.

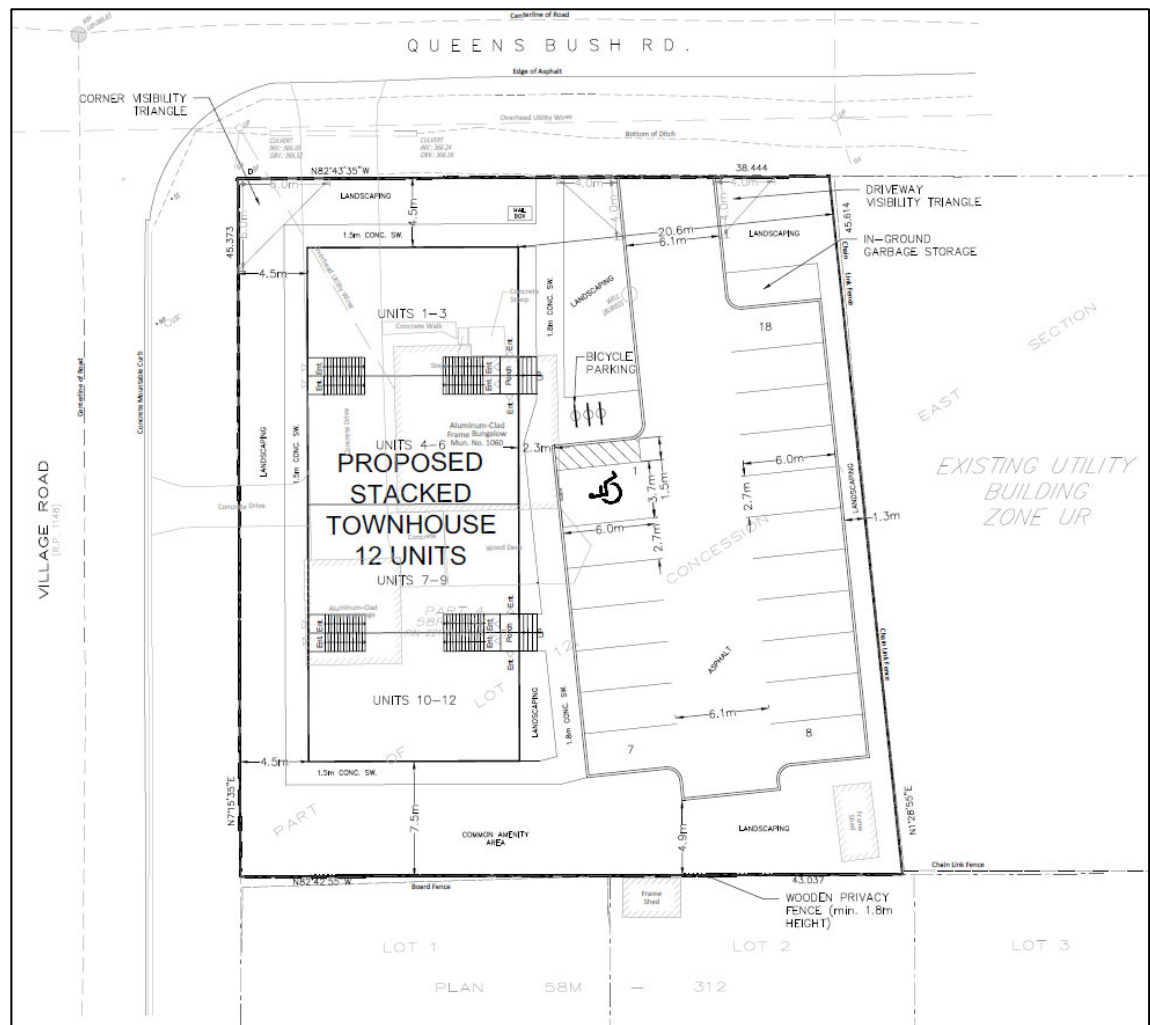
The proposed access driveway will be at a greater distance from the intersection than the existing access. The off-street parking area is located internally to the site and is shielded from view from Village Road; with the relocated driveway access to Queens Bush Road. Further, the proposed parking area is located adjacent to the Bell property to the east to minimize visual impacts to the existing residential uses abutting the lands.

The parking area will provide 18 spaces for the 12 units, which is a rate of 1.5 spaces per unit. Bicycle parking will also be provided adjacent to the parking area, with a sidewalk connection around the building to each unit entrance and a connection to the street for pedestrian mobility.

Landscaping will also be provided around the building and property boundaries; with a larger area at the rear of the property being used for a private amenity area. A new wooden privacy fence is proposed along the open rear property boundary. Additional details pertaining to Landscaping will be provided at the Site Plan Application.

Figure 8 below shows the proposed development Site Plan prepared by Arcadis IBI Group.





**Figure 8** – Proposed development Site Plan prepared by Arcadis IBI Group.

### 3.1 Precedent Images

Our client has provided photographs of a similar development recently completed in the City of Woodstock which provide an example of how the proposed development may look. Please note that detailed elevations and plans of the proposed development will be provided at the Site Plan Application stage, and the following figures are for illustrative purposes only (refer to Figure 9 and Figure 10 below).



**Figure 9** – Example of proposed building, facing the street (Source: Bradley & Co.)



**Figure 10** – Example of proposed building and interior side yard layout (Source: Bradley & Co.)

## 4 Land Use Planning Framework

The use and development of the subject property is guided by a Land Use Planning Framework comprised of Provincial plans and policies, the Region of Waterloo Official Plan, The Township of Wellesley Official Plan, and The Township of Wellesley Zoning By-Law. The following sub-section provides an overview of the relevant planning policies that pertain to the subject property and the proposed Zoning By-Law Amendment.

### 4.1 Planning Act

*The Planning Act*, R.S.O. 1990 sets out the legislative framework for land use planning in Ontario and provides the authority for the Minister of Municipal Affairs and Housing to issue policy statements and plans to guide land use planning and development in the province. The Act also sets out the legislative framework for local land use planning tools and plans, including Official Plans, Zoning By-Laws and Site Plan Approvals.

Section 2 of *The Planning Act* outlines various “Matters of Provincial interest”, which decision makers must have regard to when carrying out their duties under the Act. It is our opinion that the proposed Zoning By-Law Amendment has regard for the ‘Matters of Provincial Interest’ set out by the *Planning Act*. The proposed applications are being requested pursuant to and have regard for:

- Section 34 of the Planning Act, which establishes the legislative basis for Zoning By-Law Amendments
- Section 41 of the Planning Act, which establishes the legislative basis for Site Plan applications

Section 2 of the Planning Act sets out various “Matters of Provincial interest”, which decision makers must have regard to in carrying out their duties under the Act. These Matters are summarized and addressed in the following table:

Provincial Interest	Demonstration of Regard
a) The protection of ecological systems, including natural areas, features, and functions;	It is not anticipated that the proposed development will create significant adverse impacts to natural areas, features, and functions.
b) The protection of agricultural resources of the Province;	As the subject lands are not designated or zoned for Agricultural land use, this policy is not applicable.
c) The conservation and management of natural resources and the mineral resource base;	As the subject lands are not designated or zoned for natural resources and the mineral resource base this policy is not applicable.
d) The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	Features of significant architectural, cultural, historical, archaeological, or scientific interest do not exist on the subject property.
e) The supply, efficient use, and conservation of energy and water;	The proposed development will connect to the existing municipal servicing network and extend to the subject lands. A Functional Servicing Report and Stormwater Management Report will be submitted as part of a complete Site Plan application package.



Provincial Interest	Demonstration of Regard
f) The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The proposed development will connect to the existing municipal servicing network and extend to the subject lands. A Functional Servicing Report and Stormwater Management Report will be submitted as part of a complete Site Plan application package.
g) The minimization of waste;	The proposed development is not anticipated to specifically contribute to the minimization of waste.
h) The orderly development of safe and healthy communities;	The proposed development promotes an efficient land use pattern. The designed layout of the development with sidewalk connections surrounding the building and parking internal to the site creates a safe, pedestrian friendly development.
h.1) The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The proposed development will conform to the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) to ensure accessibility for persons with disabilities is protected.
i) The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	This Matter of Provincial Interest is not considered directly applicable to the proposed development.
j) The adequate provision of a full range of housing, including affordable housing;	The proposed development will replace one (1) existing single detached dwelling with 12 stacked townhouse dwelling units, to provide a range of dwelling units to the village housing stock.
k) The adequate provision of employment opportunities;	The proposed development will not directly provide employment opportunities, as the applicant is proposing a residential use.
l) The protection of the financial and economic well-being of the Province and its municipalities;	The proposed residential use on the subject property will contribute to and protect the financial and economic well-being of the Province and Township of Wellesley.
m) The co-ordination of planning activities of public bodies;	The proposed development implements and considers the applicable Provincial and local planning framework.
n) The resolution of planning conflicts involving public and private interests;	The proposed development will contribute to the housing stock in the village and was designed to consider the surrounding uses in the area.
o) The protection of public health and safety;	The proposed development will conform to the requirements of the AODA and the Ontario Building Code (OBC).
p) The appropriate location of growth and development;	The proposed development promotes an efficient land use pattern and creates a transition of residential densities. The Regional

Provincial Interest	Demonstration of Regard
	and Local Official Plan's also encourage residential growth within the proposed area.
q) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The proposed development will consider pedestrian movement throughout the site and through the provision of bicycle parking. The village of Wellesley is not serviced by public transit at this time.
r) The promotion of built form that, i) is well-designed, ii) encourages a sense of place, and iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.	The proposed development will incorporate a high quality of urban design throughout its design stage.
s) The mitigation of greenhouse gas emissions and adaptation to a changing climate.	This matter of provincial interest is not considered applicable to this application.

Based on the above, it is our opinion that the proposed development has regard for the "Matters of Provincial Interest" as required by the Planning Act.

## 4.2 Provincial Planning Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 was issued under Section 3 of the Planning Act and came into effect on May 1, 2020. It replaced the previous version of the PPS issued in 2014. Approval authorities, in carrying out their responsibilities under the Planning Act, are to ensure that their decisions "are consistent with" the PPS.

The PPS provides policy direction on "Matters of Provincial Interest" related to land use planning, which supports the Provincial goal of enhancing the quality of life for all citizens of Ontario. The focus of the PPS is building strong communities, a clean and healthy environment, and supporting sustainable economic growth by directing development to existing settlement areas, encouraging efficient and cost-effective land use development patterns, and protecting natural resources for the long term.

The PPS is to be read in its entirety and applicable policies are to be applied to specific situations/applications. The following table provides a summary of relevant policies of the PPS and describes how the proposed development is consistent with this policy direction.

Policy No.	Policy	Discussion of Consistency
<b>Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns</b>		
<b>1.1.1</b>	Healthy, livable and safe communities are sustained by: <ul style="list-style-type: none"> <li>a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;</li> <li>b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached,</li> </ul>	<ul style="list-style-type: none"> <li>a) The proposed development promotes efficient development and land use patterns by developing on currently underutilized lands within the Township's urban boundary.</li> <li>b) The proposed development provides for a more efficient, higher density residential land use types by adding 12</li> </ul>

Policy No.	Policy	Discussion of Consistency
	additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;	townhouse units to the village of Wellesley. The subject lands are located in close proximity to institutional, recreational, park and open space uses to meet the long-term needs of future residents.
	c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;	c) It is not anticipated that the proposed development will cause environmental/public health and safety concerns. The proposed development will be built in accordance with the AODA and the Ontario Building Code.
	d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas;	d) It is not anticipated that the proposed development will prevent the efficient expansion of settlement areas.
	e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;	e) The proposed development will facilitate intensification on lands currently underutilized within the Township's Urban Area. See the Functional Servicing and Stormwater Management Report for information regarding servicing.
	f) improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society;	f) The proposed development will conform to the requirements of the AODA to promote accessibility for persons with disabilities and older persons.
	g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;	g) See the Functional Servicing and Stormwater Management Report for information regarding the servicing of the proposed development. All required public service facilities are available to this plan.
	h) promoting development and land use patterns that conserve biodiversity; and	h) It is not anticipated that the proposed development will



Policy No.	Policy	Discussion of Consistency
	i) preparing for the regional and local impacts of a changing climate.	significantly impact biodiversity in the surrounding area.  i) The proposed development is not anticipated to contribute to the regional and local impacts of a changing climate. The proposed development will meet the requirements of the Ontario Building Code.
<b>Settlement Areas</b>		
1.1.3.1	Settlement areas shall be the focus of growth and development.	The subject lands are located within the Township of Wellesley and Region of Waterloo's Urban/Settlement Area Boundary.
1.1.3.2	Land use patterns within settlement areas shall be based on densities and a mix of land uses which:  a) efficiently use land and resources;  b) 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;  c) minimize negative impacts to air quality and climate change, and promote energy efficiency;  d) prepare for the impacts of a changing climate;	a) The proposed development will introduce a new residential use within the Township's Urban Area Boundary, promoting the efficient use of land and resources.  b) The proposed development will use existing municipal infrastructure and services. See the Functional Servicing and Stormwater Management Report for further information.  c) The proposed development is not anticipated to minimize negative impacts to air quality and climate change or promote energy efficiency. The proposed development will conform to the requirements of the Ontario Building Code.  d) The proposed development is not anticipated to directly contribute towards climate change. The proposed development will conform to the requirements of the Ontario Building Code, which does not have requirements that are directed to anticipated climate change matters.

Policy No.	Policy	Discussion of Consistency
	<p>e) support active transportation;</p> <p>f) are transit-supportive, where transit is planned, exists or may be developed;</p> <p>g) are freight-supportive.</p>	<p>e) The proposed development will be supportive of active transportation as the subject lands are located in walking/cycling distance to institutional uses and green space, and the village commercial area.</p> <p>f) The village of Wellesley is not serviced by public transit, as such this is not applicable.</p> <p>g) Not applicable for the proposed residential development.</p>
<b>Housing</b>		
<b>1.4.1</b>	<p>To provide for an appropriate range and mix of housing types and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:</p> <p>a) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development; and,</p> <p>b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.</p>	<p>The proposed development provides stacked townhouse dwellings to the Township's housing stock, contributing to the mix and range of available housing types and densities to meet the needs of current and future residents of the Region of Waterloo's market area.</p> <p>This proposed development will contribute to the required minimum ten (10) year residential growth, including minor intensification.</p>
<b>Sewage, Water and Stormwater</b>		
<b>1.6.6.2</b>	<p>Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas. Intensification and redevelopment within settlement areas on existing municipal sewage services and municipal water services should be promoted, wherever feasible.</p>	<p>See the Functional Servicing and Stormwater Management Report for information related to this policy.</p> <p>This proposed development facilitates minor intensification in support of this policy.</p>

Policy No.	Policy	Discussion of Consistency
1.6.6.7	Planning for stormwater management shall: <ul style="list-style-type: none"> <li>a) minimize, or, where possible, prevent increases in contaminant loads;</li> <li>b) minimize changes in water balance and erosion;</li> <li>c) not increase risks to human health and safety and property damage;</li> <li>d) maximize the extent and function of vegetative and pervious surfaces; and</li> <li>e) promote stormwater management best practices, including stormwater attenuation and re-use, and low impact development.</li> </ul>	The Functional Servicing and Stormwater Management Report in support of the proposed development addresses these requirements.
<b>Transportation Systems</b>		
1.6.7.2	Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	The village of Wellesley is not serviced by public transit, as such this is not applicable.
1.6.7.4	A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.	The proposed development provides residential development within proximity to institutional uses, and green space, which may be accessed by future residents through active transportation.

Under Section 1.4 Housing, the PPS directs 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”*

And directs Planning authorities to:

*“provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area”.*

Based on our professional opinion, it is our belief that the proposed development will provide a greater range of housing options in the village of Wellesley and also increase the density of the lands.

### 4.3 Growth Plan for the Greater Golden Horseshoe, 2020

The subject property is located within the Growth Plan for the Greater Golden Horseshoe Area, and any related planning decisions must conform to the applicable provisions of this Plan. The Growth Plan sets out a long-term plan for growth and development within the Greater Golden



Horseshoe Area of Ontario. The current Growth Plan came into effect on August 28, 2020. Section 1.2.1 of the Growth Plan sets out its guiding principles, which include:

- *Supporting the achievement of complete communities that are designed to support healthy and active living and meet people's needs for daily living throughout an entire lifetime;*
- *Improve the integration of land use planning with planning and investment in infrastructure and public service facilities, including integrated service delivery through community hubs, by all levels of government;*
- *Support a range and mix of housing options, including additional residential units and affordable housing, to serve all sizes, incomes, and ages of households;*
- *Provide for different approaches to manage growth that recognize the diversity of communities in the GGH;*
- *Support and enhance the long-term viability and productivity of agriculture by protecting prime agricultural areas and the agri-food network;*
- *Integrate climate change considerations into planning and managing growth such as planning for more resilient communities and infrastructure – that are adaptive to the impacts of a changing climate – and moving towards environmentally sustainable communities by incorporating approaches to reduce greenhouse gas emissions.*

In our opinion, the proposed development conforms to the guiding principles noted above for the following reasons:

- *The proposed development facilitates intensification on an underutilized property within the Township's Built-Up Area.*
- *Representing context appropriate intensification aligned with the objective of the Regional and Local Official Plans for the area.*
- *The proposed development will be supported by existing municipal services, promoting the efficient use of this infrastructure.*
- *The proposed development has consideration for pedestrians, as the proposed development will have a sidewalk connection surrounding the building and connecting to Queens Bush Road*
- *The proposed development will add 12 stacked townhouse residential dwellings to the Township's housing stock.*
- *The proposed development contemplates stacked townhouse dwellings, which will add to the mix of housing options to the Townships housing stock.*
- *The proposed development is not anticipated to impact the Province's agricultural and mineral aggregate resources.*

Based on the foregoing, it is our opinion that the proposed development conforms to the Growth Plan.

## 4.4 Region of Waterloo Official Plan

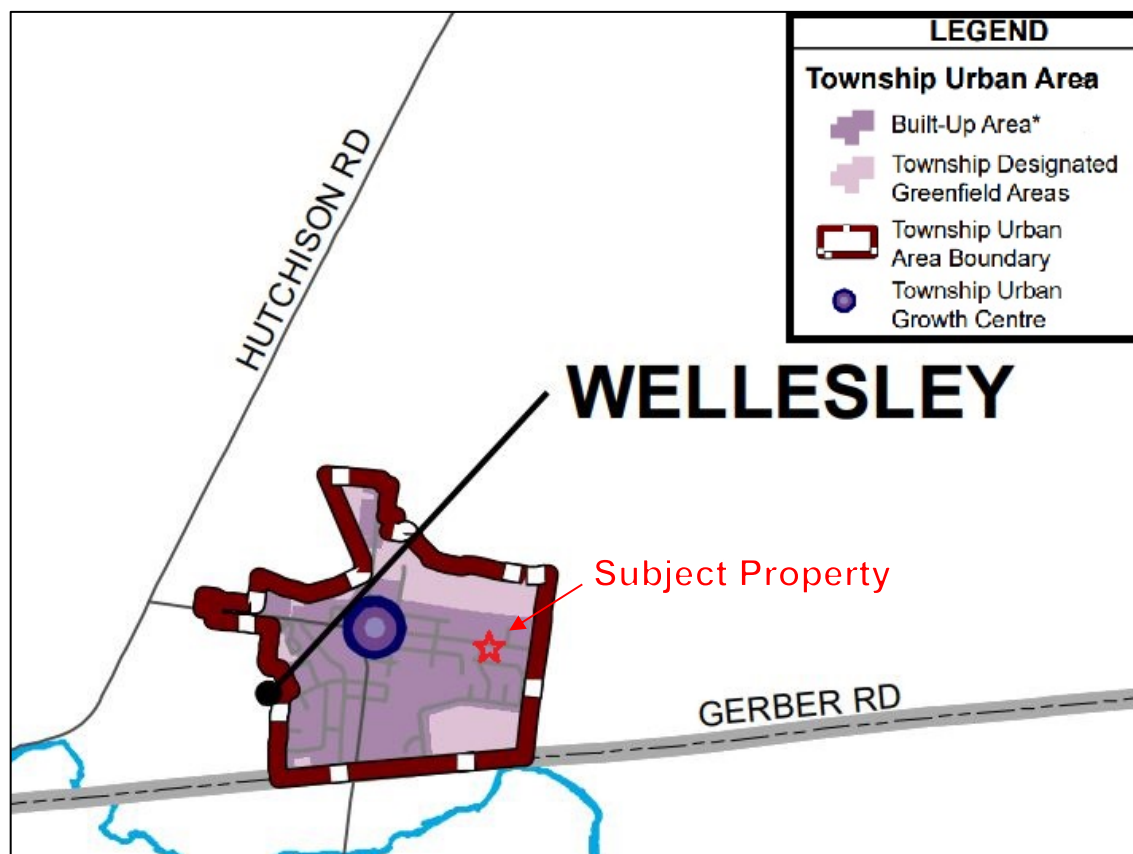
The Regional Official Plan (ROP) sets out the policy direction of land use planning in the Region over a 20-year planning horizon. The Ministry of Municipal Affairs and Housing approved a new Regional Official Plan (ROP) in 2010. The decision was subsequently appealed to the Ontario Municipal Board (OMB), who issued a decision in June 2015, allowing the ROP to come into full force and effect. All planning decisions within the Region of Waterloo must conform to the ROP, including the proposed Zoning By-Law Amendment and Draft Plan Applications.

It is also our understanding that Amendment No. 6 to the Regional Official Plan is an amendment to establish the planning framework for accommodating Waterloo Region's forecasted population and employment growth to 2051, in conformity with the Growth Plan. The amendment will help guide strategic decisions regarding land use planning and a range of Regional services, including transportation, public transit, water and wastewater supply and services, public health, economic development, affordable housing and others.

The ROP determines areas for growth and development, sets out population and employment forecasts and density targets, establishes an Urban Boundary, promotes multi-modal transportation options, and sets out policies to protect the Region's valuable environmental and agricultural resources. The proposed development is located within the Urban Area Boundary of the Region.

#### 4.4.1 Urban Boundary and Built-Up Area

The ROP identified the subject property as Urban Area and Built-Up Area, as displayed in Figure 11. The Built-Up Area includes all lands within the built boundary of the Region's Urban Area and Township Areas as of June 16, 2006.



**Figure 11 - Map 3d – Township of Wellesley Township Urban Area Boundary Wellesley (Source: Region of Waterloo Official Plan)**

The ROP directs that 45 per cent of new residential development should be directed to the Built-Up Area by the local municipalities in order to support the efficient use of land and physical and community infrastructure/services. It is further stated that the Built-Up Area is mainly comprised of established residential neighbourhoods which are not expected to experience a significant amount of change within the horizon of the ROP. The proposed development will help satisfy the Region's density target for infilling, by providing context-appropriate intensification within the existing Built-Up Area.

The proposed development conforms to the general policies of the ROP due to its location in the Built-Up Area, which optimizes the use of municipal services, contributes to the creation of complete communities, and respects the scale, character, and context of the surrounding established neighbourhood.

Development within the Built-Up Area is subject to Policy 2.D.1 of the ROP, which is discussed in the following table.

Policy	Discussion of Conformity
<b>In preparing or reviewing planning studies, or in reviewing development applications or site plans, the Region and/or Area Municipalities will ensure that development occurring within the Urban Area is planned and developed in a manner that:</b>	
a) supports the Planned Community Structure described in this Plan;	The proposed development provides intensification within the Regional and Township's Built-Up Area.
b) is serviced by a municipal drinking-water supply system and a municipal wastewater system;	The proposed development will be serviced by existing municipal water and wastewater services.
c) contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit;	<p>The proposed development will replace the existing low-density residential use on the subject lands with a medium-density residential use. The surrounding neighbourhood is currently a mix of low-density residential uses, however, based on the massing, height and siting of the proposed stacked townhouse building, it is our opinion that the development is compatible.</p> <p>The subject property is located in walking/cycling distance to green spaces and institutional uses.</p>
d) protects the natural environment, and surface water and groundwater resources;	The existing vegetation on the subject property will be retained where possible. No naturally significant features are identified on the subject property.
e) conserves cultural heritage resources and supports the adaptive reuse of historic buildings;	Cultural heritage resources do not apply to the subject property.
f) respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;	<p>The proposed development will provide stacked townhouse dwellings in a neighbourhood which is an existing mix of low-density development. As mentioned earlier throughout, infill and intensification within the urban boundary is strongly encouraged and has consideration of the surrounding uses based on the site design.</p> <p>The scale, character, and context of the subject property of the surrounding neighbourhood will be respected by the proposed development.</p>



Policy	Discussion of Conformity
g) facilitates residents' access to locally grown and other healthy foods in neighbourhoods; and	The subject lands are located within a short driving distance to multiple grocery stores and other commercial or retail uses.
h) promotes building designs and orientations that incorporate energy conservation features and the use of alternative and/or renewable energy systems.	This will be confirmed through the Site Plan and Building Permit applications required for the project. The proposed development will conform to the standards of the OBC.

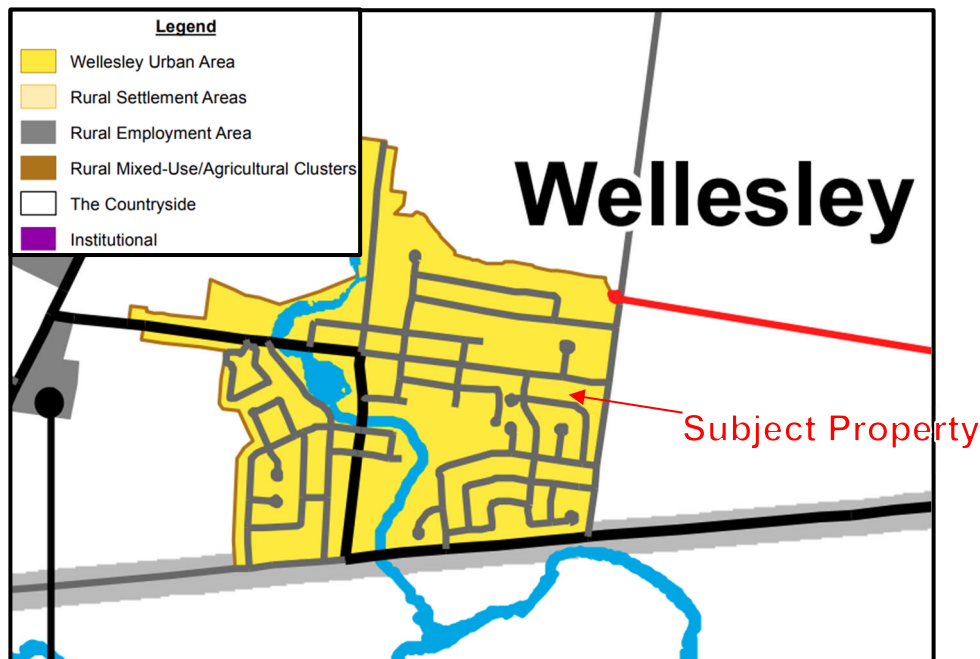
Based on the above, it is our professional opinion that the proposed development is in keeping with the Regional Official Plan as it is within the Built-Up Area, within the Urban Boundary and will not impact farmlands or natural areas. The proposed development will make use of the existing infrastructure and servicing. It provides a more efficient use of the existing Lot, with increased density; which in turn will enhance growth within the community to strengthen the economic vitality.

## 4.5 The Township of Wellesley Official Plan

The Township of Wellesley Official Plan sets out policies related to the long-term growth and direction of development in the Township. The Township of Wellesley Official Plan established a policy framework to guide public and private sector decisions relating to development and the provision of community infrastructure and services.

### 4.5.1 Wellesley Urban Area

The subject lands are currently located within the 'Wellesley Urban Area', as identified in Map 2 (Planned Township Structure) of the Township's Official Plan (Figure 12). According to Section 2.1.1 of the Official Plan, it is understood that this designation is intended to serve as the primary focus for growth and development in the Township to the year 2031.



**Figure 12** – Map 2, Planned Township Structure, Township of Wellesley Official Plan.

As outlined in Section 2.7.1.1 of the Official Plan, development within the Wellesley Urban Area provides for a broad range of residential, commercial, employment, recreational and institutional uses, and that future development within the Wellesley Urban Area will be directed predominantly to the built-up area. Future development should also occur where municipal servicing is available.

Development within the Wellesley Urban Area is subject to Section 2.7.1.2 of the Township Official Plan as follows:

REQUIRED MANNER	PROVIDED BY PROPOSAL
a) supports the Planned Township Structure described in this Plan	New residential development is within the Built-Up Area
b) uses municipal water and wastewater services;	Existing municipal services will be utilized
c) contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit	Will enhance the range of dwellings available in the community.  Sidewalk connection and bicycle parking provided.  Public transit not applicable as no service is currently provided to the village.
d) protects the natural environment, and surface water and groundwater resources;	The proposed development will not impact any naturally significant features and is not located within a Source Water Protection Area.  Salt Management Plan for parking area to be addressed through Site Plan Application.
e) conserves the township's cultural heritage resources and supports the adaptive reuse of historic buildings	Not applicable
f) respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur	Intensification of this site has been scaled to respect the size and height of surrounding dwellings. A maximum of two-storeys is proposed in order to minimize overlook and privacy concerns.
g) facilitates residents' access to locally grown and other healthy foods in neighborhoods	The increased number of residents on this property will have access to the local farmers market and other local businesses.
h) promotes building designs and orientations that incorporate energy conservation features and the use of alternative and/or renewable energy systems.	Options are being considered and will be discussed during the Site Plan Application.

The proposed development conforms to the policies above, as it is anticipated to make efficient use of underutilized lands through the development of medium density stacked townhouse dwellings. The proposed development has regard for the surrounding lands uses, as the proposed residential development will support and/or complement other uses in the area, like green space and institutional uses located within the immediate area. It is also anticipated to make efficient use of existing municipal infrastructure within the area.

It is also stated under Section 2.7.2.4 that

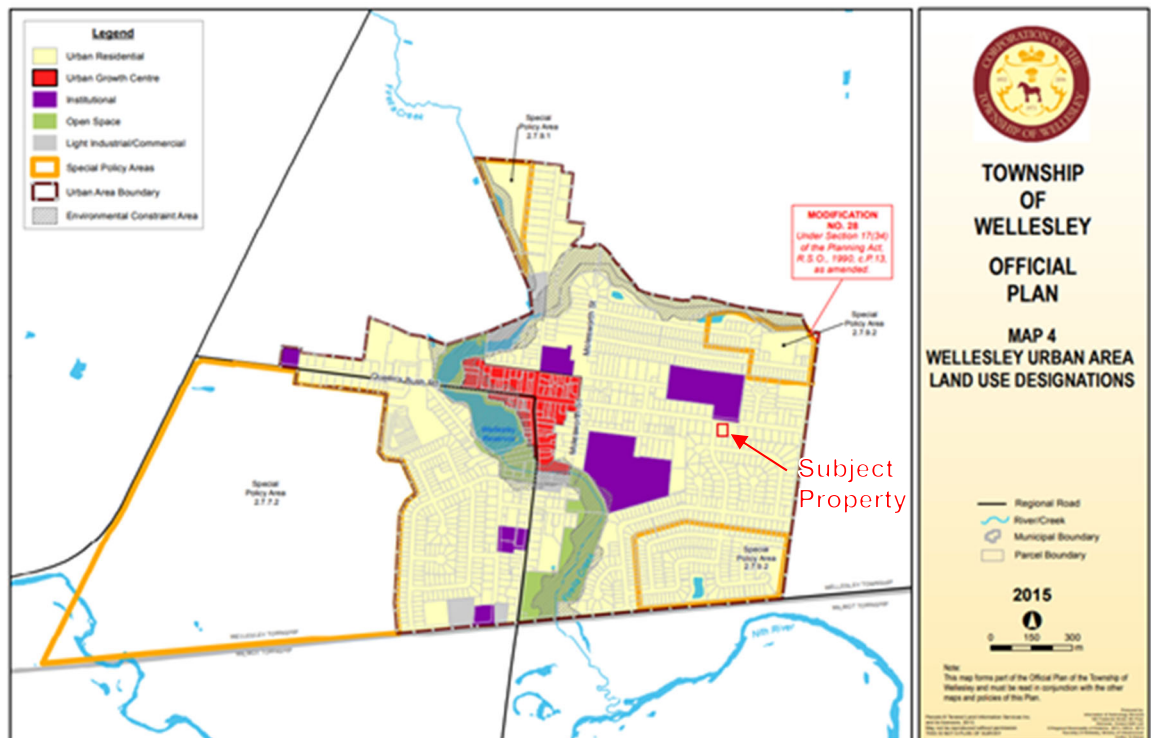
*“the Township will encourage the provision of new dwelling units in the built-up areas of the Wellesley Urban Area through infill, conversion where appropriate, intensification or redevelopment compatible with surrounding uses, except where infrastructure is inadequate or there are significant physical constraints.”*

It is our opinion that the proposed stacked townhouse units are encouraged based on the policy above, as the development will occur within the built-up area and make use of existing infrastructure. It is also our opinion that the proposed development is compatible with the surrounding uses, based on the proposed siting of the development through site design.

Based on the above, it is our opinion that the proposed development conforms to the Wellesley Urban Area policies outlined in the Official Plan.

#### 4.5.2 Land Use Designation – Urban Residential

The Township of Wellesley designates the subject property as ‘Urban Residential’ on Map 4 of its Official Plan and shows it is within the Wellesley Urban Area boundary (see Figure 13).



**Figure 13** – Map 4, Wellesley Urban Area Land Use Designation, Township of Wellesley Official Plan.

As outlined in Section 2.7.6.1 of the Official Plan, the purpose of the Urban Residential designation is to provide for a range of residential and accessory uses in order to accommodate current and future residential demands. Further, Section 2.7.6.3 states that a mix of housing types and densities will be encouraged in this designation in accordance with Section 4.2 of the Official Plan (see Section 4.5.3 of this Report for details).

Therefore, based on the existing land use designation, it is our opinion that the proposed stacked townhouse dwellings are permitted and strongly encouraged on the subject property. The land use designation permits a range of housing types, and the proposed development will provide medium-density residential uses within the urban boundary.

### 4.5.3 Housing Policies

Chapter 4 of the Official Plan outlines Housing Policies pertaining to the Township. More specifically, Section 4.1 of the Official Plan states the following “General Policies”:

- 4.1.1 *The Township will maintain the ability to accommodate residential growth for a minimum of 10 years taking into account the density and reurbanization targets of this Plan, and if necessary, lands which are designated and available for residential development.*
- 4.1.2 *The Township will maintain, where new development is to occur, land with servicing capacity sufficient to provide at least a three year supply of residential units available through land suitably zoned to achieve the density and reurbanization targets of this Plan, and land in draft approved and registered plans.*
- 4.1.3 *The Township will give priority to the approval of development applications which provide housing types that are needed in the community.*

Based on the above, the proposed 12 stacked townhouse units will contribute to the residential growth and supply of housing in the Township. The proposed dwelling units will directly contribute to the population and housing supply projections, as well as the project residential growth for a minimum of 10 years.

Additionally, Section 4.2 of the Official Plan also provides direction for providing a “Range and Mix of Housing Types” in the Township as follows:

- 4.2.1 *The Township will encourage the development and integration of a diverse range and mix of housing types and tenure options consistent with the reurbanization and density targets established in this Plan. The Township will:*
  - a) *provide opportunities for reurbanization within the built-up area of the Wellesley Urban Area, except where infrastructure is inadequate or there are significant physical constraints;*
  - b) *promote the efficient use of land in new residential developments and in redeveloping areas; and,*

Based on the policies listed above, The proposed development will provide a range and mix of housing types in the built-up area of the Wellesley Urban Area by way of 12 stacked townhouse units. It is further our opinion that the proposed medium-density will make efficient use of the land relative to the existing low-density residential use on the subject property.

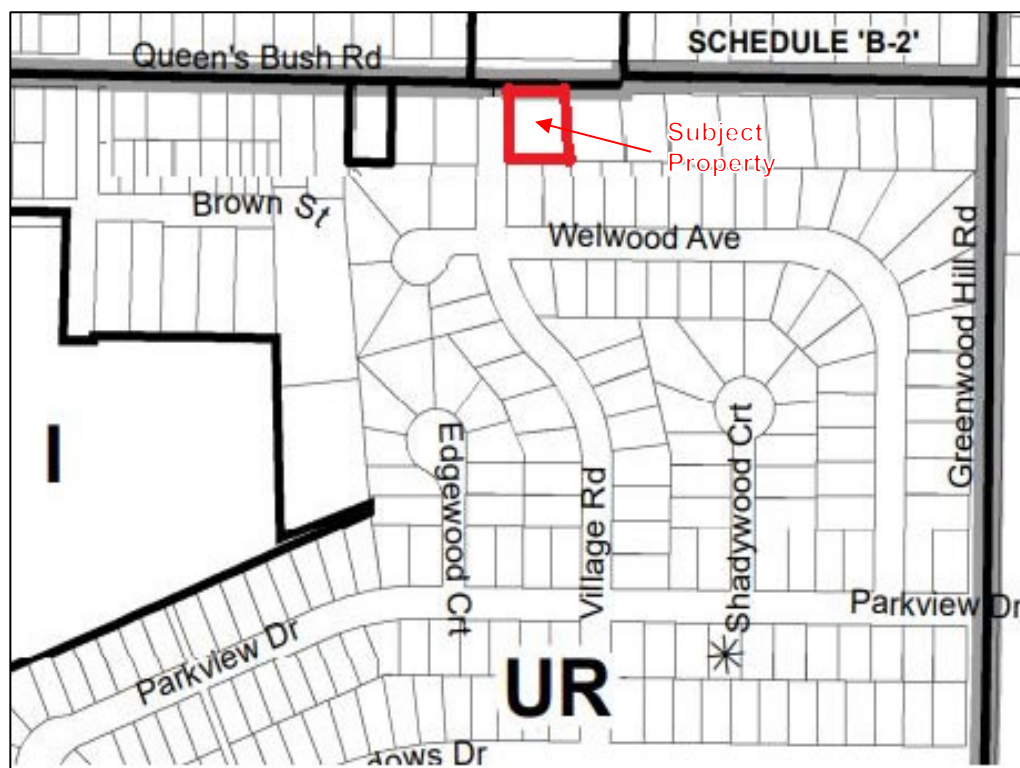
Based on the above, it is our opinion that the proposed development is in keeping with the housing policies outlined in the Official Plan.

It is in our professional opinion that the proposed development meets the intent and the re-occurring policies in the Township's Official Plan. It will be a more efficient use of the subject property with a higher density of dwellings; developed upon existing municipal services; provide a new type of dwelling unit for existing and future residents of the village; while being in keeping with the surrounding residential use and heights.

## 4.6 Township of Wellesley Zoning By-Law

The subject property is currently zoned Urban Residential (UR) in the Township of Wellesley Zoning By-Law 28/2006, as shown in Figure 14 below. This zoning permits a range of residential uses, including single detached, semi-detached, duplex dwellings and group homes. As such, the proposed Townhouse use is not considered a permitted use in the current UR Zone.





**Figure 14** – Subject property is within the “UR” zoned lands (Source: Township Zoning By-Law Maps)

In order to permit the proposed stacked townhouse units, the applicant is proposing a Zoning By-Law Amendment to change the zoning of the subject property from UR to Urban Residential Two (UR2). This zone permits semi-detached, townhouse dwellings, triplex and four-plex dwellings.

It should be noted that there are no provisions in the UR2 Zone, or any other residential zone within the Township Zoning By-Law that specifically permit a “stacked townhouse” dwelling unit. Stacked townhouse dwellings are provided for however under the Definitions, Section 2.71 as follows:

#### Stacked Townhouse Dwelling

*“shall mean a townhouse dwelling with dwelling units also divided horizontally, each of which has an independent access from the outside ground level or common entrance hall”.*

Part of our request will be to amend the Zoning By-Law to zone the subject property as Urban Residential Two (UR2), with a provision to permit Stacked Townhouse Dwellings” on the subject property. It is in our professional opinion that stacked townhouse dwellings can provide efficient use of lands while maintaining the character of low-rise residential neighbourhoods.

The following table provides a summary of the regulations applicable to the proposed development within the UR2 Zone. What is denoted in red text in the table below is the requested Site-Specific Provision:

UR2	REQUIREMENT	PROVIDED
Min. Lot Area	175 m <sup>2</sup> / Townhouse unit (175 m <sup>2</sup> x 12 units = 2,100m <sup>2</sup> )	154 m <sup>2</sup> / unit (154 m <sup>2</sup> x 12 units = 1,848.7m <sup>2</sup> )
Min. Lot Frontage for corner Lot	12.0m	38.4m
Max. building height	9.0m	Max. 9.0m
Min. floor area	100m <sup>2</sup> / unit	Min. 100m <sup>2</sup>
Front Yard depth	6.0m	4.5m
Exterior Side Yard depth	6.0m	4.5m
Interior Side Yard depth 0.5 x building height, min. 3.0m	4.5m	20.6m
Rear Yard depth	7.5m	7.5m
Max. Lot coverage	40%	24%
Min. landscaped open space	30%	33%
Min. distance to Intersection of streets	9.0m	35m
<b>PARKING</b>	-	-
1.5 spaces / townhouse unit	18	18
Typical space dimensions	2.7m x 6.0m	2.7m x 6.0m
# of Accessible spaces	1 Type A	1 Type A
Accessible space width	Type A: 3.7m width with 1.5m access aisle	Type A: 3.7m width with 1.5m access aisle

Based on the text and table above, the proposed UR2 Zone on the subject property will require Site-Specific Provisions as follows:

- Permit “Stacked Townhouse Dwellings” in addition to the uses outlined in Provision 11.1 of the Zoning By-Law;
- Permit a minimum Lot Area of 154 m<sup>2</sup> for “Stacked Townhouse Dwellings”, whereas 175 m<sup>2</sup> is required;
- Permit a minimum Front Yard depth of 4.5 metres, whereas the Zoning By-Law requires 6.0 metres; and,
- Permit a minimum Exterior Side Yard depth of 4.5 metres, whereas the Zoning By-Law requires 6.0 metres.

The minimum Lot area is based on the area required for regular townhouse units, as stacked townhouse units are not set out in any zoning requirements under the existing residential zoning. 2,100 square metres is required for 12 townhouse units, being 175 square metres per unit. The subject property is 1,848.7 square metres in area; with 12 stacked townhouse units proposed, this equates to 154 square metres per unit.

It is our professional opinion that the area required for stacked townhouses can be reduced as stacked townhouses are a higher density form of dwelling. For example, each unit does not

require a front or rear yard area; however, an amenity area has been provided for in the proposed plan.

Reduced front and exterior side-yard depths of 4.5 metres, from the required 6.0 metres are proposed. The existing detached double garage structure on the property is approximately 4.5 metres from Village Road. No vehicle parking is required within the front or exterior side yards of the proposed plan and the corner visibility triangle requirement has been met and shown on the plan and will not impede sight lines at the intersection of Village Road and Queens Bush Road.

It is our professional opinion that the reduced front and exterior side yard depths will create a street scape that enhances the street view and creates a better feeling of pedestrian connectivity and eyes on the street.

The remaining UR2 and parking requirements have been met and respect the existing neighbourhood, such as the maximum building height of 9 metres; the rear yard depth meeting the requirement of 7.5 metres; the parking requirement being met at 1.5 spaces per unit. Some requirements are greatly exceeded, for example the existing driveway onto Queens Bush Road does not meet the 9.0 metre distance from the intersection with Village Road; however, the proposed access is 35 metres from the center line of Village Road; providing a safer distance from the intersection where the school crossing is located.

## 5 Supporting Plans and Studies

As part of the complete application for the proposed Zoning By-Law Amendment, the following supporting plans and studies have been prepared and submitted for City and Agency review based on the Pre-Consultation Record:

- Servicing Brief dated March 14, 2023 prepared by Arcadis IBI Group

Please refer to the Cover Letter submitted as a complete application package for a detailed list of the Report, Plans and Studies prepared for this submission.

## 6 Planning Justification

This section of the Report summarizes the planning justification in support of the proposed Zoning By-Law Amendment Application.

### 6.1 Alignment with Overarching Planning Framework

As discussed earlier in this report, it is our professional opinion that this proposal meets the purpose and guidelines included in The Provincial Policy Statement (PPS), 2020; the Growth Plan for the Greater Golden Horseshoe Area (2020); The Region of Waterloo's 'Regional Official Plan'; and the Township of Wellesley Official Plan by maximizing the efficiency and density of the subject property while proposing a development that will be in keeping with the low-rise residential neighbourhood.

### 6.2 Located within the Urban Area

The proposed development is located within the Wellesley Urban Area identified by the Wellesley Official Plan. It is understood that growth and development within the Township should be focused within existing urban areas. It is also understood that the Township Official Plan provides opportunities for reurbanization within the built-up area of the Wellesley Urban Area on municipal servicing; promotes the efficient use of land in new residential developments and in

redeveloping areas; and supports and encourages innovative lot configurations, housing designs and construction techniques.

Given that the proposed development aims to intensify lands that are currently under-utilized in the urban boundary, it is our opinion that the proposed development is supported by the planning policies outlined in the Official Plan. It is also anticipated that the proposed development will make efficient of existing services, as it will connect to the municipal services within the urban boundary. Further, the design and layout of the development aims to create an attractive streetscape to both Queens Bush Road and Village Road; and keeps the proposed parking area mainly hidden from the street view to minimize impact to the public realm.

### 6.3 Provides a Mix of Housing Options and Densities

The proposed stacked townhouse units will not only increase density within an existing urbanized area but will increase the range and choice of unit types for existing and new residents in the village of Wellesley. It is understood that the Region and Township support a range of housing options and densities in order to meet future housing demand and demographic change. As such, the proposed 12 townhouse units will provide additional housing types on land that is currently underutilized within the urban area.

### 6.4 Efficient Use of Infrastructure and Municipal Services

It is understood that the Township encourages the use of existing municipal services with the goal of limiting the expansion of its current infrastructure. As demonstrated in the Civil Engineering Feasibility Report, the proposed development will connect to existing municipal services as the subject lands are located within the urban area.

The proposed development will also connect to the existing municipal sidewalk system, making efficient use of the Township's infrastructure and providing greater connectivity for future residents to uses in the neighbourhood.

## 7 Conclusions and Recommendations

This Report provides an overview of the proposed redevelopment of the subject property known municipally as 1060 Queens Bush Road, including its surrounding context and the applicable land use planning framework. It also describes the development proposed by our client, and the required planning applications needed to advance the proposed development. Based on the justification described in this Report, it is our opinion that the proposed Zoning By-Law Amendment application is justified, has regard to the "Matters of Provincial Interest" set out in the Planning Act, is consistent with the Provincial Policy Statement, and conforms to the general intent of the Growth Plan for the Greater Golden Horseshoe, the Region of Waterloo Official Plan and the Township of Wellesley Official Plan.

The Zoning By-Law Amendment will provide for a dwelling type that is not currently provided for under existing residential uses, but a use that will help maximize efficiency and density on both new and existing residential properties and increase the choice of unit types to the residents of Wellesley. It is our opinion that the proposed development has regard for the existing character of the neighbourhood based on the Site Plan and supporting material prepared as part of a complete submission package.

It is therefore, our recommendation that the municipality:

- Together with this report, Servicing Brief, completed municipal application form and fees deem the Zoning By-Law Amendment application as complete and process the application in accordance with the municipal process.



ARCADIS IBI GROUP FINAL

PLANNING JUSTIFICATION REPORT  
1060 QUEENS BUSH ROAD,  
TOWNSHIP OF WELLESLEY

Prepared for Bradley & Co.

- Schedule a Public Meeting to obtain comments from the neighbourhood; and
- Provide the opportunity for review of the Report and supporting materials to the Township of Wellesley Council, technical review agencies and the community.

Yours truly,

ARCADIS IBI GROUP

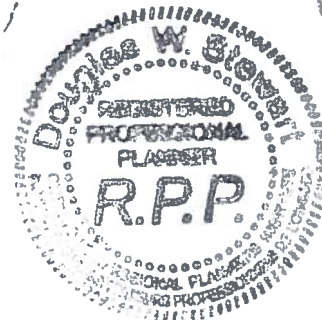


Douglas W. Stewart, MCIP, RPP

Associate

Manager, Urban & Regional Planning

DWS/baw



I hereby certify that this Planning Justification Report was prepared by a Registered Professional Planner, within the meaning of the Ontario Professional Planners' Institute Act, 1994.

2023-03-15

Date



Douglas W. Stewart, MCIP, RPP