

Township of Puslinch
Planning and Development
7404 Wellington Road 34,
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November 20, 2024
File: 10779

County of Wellington
Planning and Development
74 Woolwich Street
Guelph, ON
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Attn: Lynne Banks, Development and Legislative Coordinator, Township of Puslinch
Meagan Ferris, Manager of Planning and Environment, County of Wellington
Zach Prince, Senior Planner, County of Wellington

Re: Planning Justification Report Addendum
11 Main Street, Morriston
Township of Puslinch

Weston Consulting has been retained by WDD Main Street Inc, the registered owner of the lands municipally known as 11 Main Street (Lot 31, Concession 8) in the Township of Puslinch (herein referred to as the “subject lands”) to provide planning assistance for a proposed residential subdivision. This Letter is an addendum to the Planning Justification Report prepared by Weston Consulting on March 4, 2023, updated in September 2024, and has been prepared in support of Zoning By-law Amendment and Draft Plan of Subdivision applications to permit a residential subdivision consisting of 21 detached dwelling lots, environmental protection lands, a stormwater management pond and municipal roads. This Letter is based on the comments received on September 19, 2024 from NPG Planning Solutions to provide analysis of the new Provincial Planning Statement, 2024 and to provide further detail and justification for the additional permitted uses being additional residential units and home businesses. This Letter is to be read in conjunction with the Planning Justification Report updated September 2024.

Based on the analysis contained herein the proposed Zoning By-law Amendment and Draft Plan of Subdivision Applications are consistent with the Provincial Planning Statement, 2024. Furthermore, additional dwelling units and home businesses are desirable and appropriate accessory uses for the proposed single detached dwelling units. Additional letters have been submitted to assess whether the additional dwelling units and home businesses are supportable from a technical perspective. As per the letters prepared by Crozier, GHD, Colville, and Englobe, there are no expected adverse impacts in permitting additional dwelling units and home businesses, as detailed below.

Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS) came into effect on October 20, 2024 and replaced the Provincial Policy Statement, 2020 and the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020 Consolidation). The PPS applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. Section 3 of the Planning Act requires that decisions affecting planning matters shall be consistent with policy statements issued under the Act.

The policies of the PPS direct growth to settlement areas, encourage intensification and the creation of complete communities, and support the efficient use and management of land, resources and infrastructure to meet current and future needs. These land use patterns promote a mix of housing, including affordable housing, and a full range of employment, recreation, parks and open spaces and transportation choices. The PPS provides for and promotes appropriate development while protecting resources of provincial interest, such as public health and safety and the quality of the natural and built environment. In addition, the PPS supports intensification and redevelopment where applicable to promote the efficient use of land where infrastructure and public services are available.

On May 26, 2022 the County of Wellington Council approved Official Plan Amendment 119 ('**OPA 119**') which was subsequently approved by the Ministry of Municipal Affairs and Housing (MMAH) on April 11, 2023 with modifications. Part of the modifications made by the MMAH, included modifications to urban boundary expansions and employment area conversions; however, these modifications were reversed through Bill 150 which received Royal Assent on December 6, 2023. The in-effect version of OPA 119 designates the subject lands as a part of the *Morrison Rural Settlement Area (Secondary Urban Centre)*; as such, the subject lands are considered to be part of Rural Areas and a Settlement Area.

Building Homes, Sustaining Strong and Competitive Communities

Chapter 2 of the PPS provides direction related to Building Homes, Sustaining Strong and Competitive Communities and is applicable to the subject lands. It generally encourages a variety of land uses within communities and encourages the efficient use of land and infrastructure.

Planning for People and Homes

Section 2.1 contains policies pertaining to maintaining an appropriate supply of residential units as well as employment opportunities within a compatible mix of land uses. The following policies are of relevance to the subject lands;

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*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

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, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
- b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
- c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

The proposed development is consistent with the aforementioned policies by promoting growth and adding to the current housing supply of the area for current and future residents. The proposed development also provides for the efficient expansion of existing local roads.

Housing

Section 2.2 of the PPS provides more specific policy direction regarding Housing. The PPS encourages a range and a mixture of housing types and densities in order to meet the current and projected needs of residents. The following policies are relevant:

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:

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

The PPS directs the development of new housing towards locations where an appropriate level of infrastructure and public service facilities exist. The subject lands have direct access to community services including an adjacent park, and restaurants at the intersection of Badenoch Street and Highway 6. The proposed lots and associated dwellings reinforce the surrounding area context and the level of servicing available to the subject lands, while providing for appropriate compact development by way of reducing the lot sizes to provide additional housing.

Settlement Areas

Section 2.3.1 of the PPS provides directions on future growth and development within Settlement Areas. The PPS promotes efficient development patterns within settlement areas, which are locations where growth and development is to be focused. The subject lands are located within the Settlement Area of Morriston. The following policies are relevant 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

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

The proposed development supports the policies of the PPS regarding the efficient use of land and resources by developing an underutilized parcel within a settlement area which is adjacent to similar low density uses and a municipal park. Furthermore, the proposed lot sizes are smaller than the *Urban Residential* zone permits, to increase the density and provide for appropriate compact built form while also respecting the limitations for lot sizes to accommodate private services.

Rural Areas in Municipalities

Section 2.5 of the PPS provides policies related to rural areas which include rural settlement areas. OPA 119 designates Morriston as a *Rural Settlement Area*, as such, the Rural Areas policies in the PPS are applicable. The following policies pertain to the subject lands:

2.5.1. Healthy, integrated and viable rural areas should be supported by:

- a) building upon rural character, and leveraging rural amenities and assets;*
- c) accommodating an appropriate range and mix of housing in rural settlement areas;*
- d) using rural infrastructure and public service facilities efficiently;*
- e) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*
- g) conserving biodiversity and considering the ecological benefits provided by nature;*

2.5.2. In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.

2.5.3. When directing development in rural settlement areas in accordance with policy 2.3, planning authorities shall give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels.

The proposed development provides for a low-density subdivision, in keeping with the existing character of Morriston and preserves the environmental features within the eastern and southern portion of the subject lands. The proposed lot sizes are also informed by the provision of private services required for development in Morriston.

Energy Conservation, Air Quality and Climate Change

The following energy conservation and climate change policies within Section 2.9 of the PPS are relevant to the proposed development:

2.9.1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:

- a) support the achievement of compact, transit-supportive, and complete communities;*

- b) incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*
- d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and*

The applications are consistent with the PPS with regards to energy conservation, air quality, and climate change. The proposed development includes a more compact lot size than currently permitted on the lands. Furthermore, the Functional Servicing and Stormwater Management Report identify that low impact development features are incorporated to mitigate stormwater impacts from the proposed development.

Infrastructure and Facilities

Chapter 3 of the PPS outlines policies pertaining to infrastructure and facilities. General policies for infrastructure and public service facilities that pertain to the subject lands are as follows:

3.1.1. Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:

- a) are financially viable over their life cycle, which may be demonstrated through asset management planning;*
- b) leverage the capacity of development proponents, where appropriate; and*
- c) are available to meet current and projected needs.*

3.1.3. Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services, and to ensure the protection of public health and safety in accordance with the policies in Chapter 5: Protecting Public Health and Safety.

Sewage, Water and Stormwater

Section 3.6 of the PPS provides direction for sewage, water and stormwater infrastructure, including the provision of private servicing where necessary:

3.6.1. Planning for sewage and water services shall:

- b) ensure that these services are provided in a manner that:
 - 1. can be sustained by the water resources upon which such services rely;*
 - 2. is feasible and financially viable over their life cycle;*
 - 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and*
 - 4. aligns with comprehensive municipal planning for these services, where applicable.**
- c) promote water and energy conservation and efficiency;*
- d) integrate servicing and land use considerations at all stages of the planning process;*

3.6.4. Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.

At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services on environmental health and the financial viability or feasibility of other forms of servicing set out in policies 3.6.2 and 3.6.3.

3.6.8. Planning for stormwater management shall:

- a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c) minimize erosion and changes in water balance including through the use of green infrastructure;*
- d) mitigate risks to human health, safety, property and the environment;*
- e) maximize the extent and function of vegetative and pervious surfaces;*
- f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*

The proposed development will be provided with individual private sewage and water services in a manner consistent with the applicable policies and guidelines. Furthermore, a Functional Servicing and Stormwater Management Report has been prepared by Crozier which identifies the proposed development will provide for stormwater quality and quantity control via swales and infiltration trenches. For further details please refer to the Report provided by Crozier Consulting Engineers.

Wise Use and Management of Resources

Chapter 4 of the PPS guides the Wise Use and Management of Resources, including natural heritage and water.

Section 4.1 of the PPS provides policies related to natural heritage features and ensuring natural areas are protected for the long-term. Due to the natural features on the subject lands, the following policies are relevant:

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

4.1.2. 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.

4.1.3. Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.

4.1.4. Development and site alteration shall not be permitted in:

- a) significant wetlands in Ecoregions 5E, 6E and 7E1; and*
- b) significant coastal wetlands.*

4.1.5. Development and site alteration shall not be permitted in:

- a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;*
- b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;*
- c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;*
- d) significant wildlife habitat;*
- e) significant areas of natural and scientific interest; and*
- f) coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4.b),*

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

4.1.6. Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.

4.1.7. Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.

4.1.8. 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.

A wetland, significant woodland, and watercourse are present on the subject lands. There are no bodies of water or watercourses on the lands that are considered to be providing fish habitat. Three endangered species were documented on the subject lands by Colville Consulting. Mitigation measures are proposed in accordance with the Environmental Impact Study prepared by Colville Consulting, December 2023. The natural features and associated buffers will be protected via conveyance to the Township and with the rezoning of this portion of the subject lands to “Natural Environment” and the “Environmental Protection” overlay. Eight mitigation measures are proposed to assist in avoiding any impacts associated with the proposed development and concludes that are no expected negative impact on the natural areas. Accordingly, the proposed development is consistent with the PPS.

Water

Section 4.2 of the PPS includes policies regarding the protection and improvement of quality and quantity of water.

4.2.1. Planning authorities shall protect, improve or restore the quality and quantity of water by:

- a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;*
- b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts;*

- c) *identifying water resource systems;*
- d) *maintaining linkages and functions of water resource systems;*
- e) *implementing necessary restrictions on development and site alteration to:*
 - 1. *protect all municipal drinking water supplies and designated vulnerable areas; and*
 - 2. *protect, improve or restore vulnerable surface and ground water, and their hydrologic functions;*
- f) *planning for efficient and sustainable use of water resources, through practices for water conservation and sustaining water quality; and*
- g) *ensuring consideration of environmental lake capacity, where applicable.*

2. 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.

The subject lands consist of proposed lots that are appropriately sized to accommodate private water and wastewater services (well and septic) as municipal services are not available. The depth, size, and locations of the wells will be determined during the detailed design of each individual lot. Privately owned individual on-site sewage systems are proposed for this development. This servicing approach is consistent with the greater community and is suitable for rural settlement area subdivisions. Privately owned sewage systems are owned and operated by the property owner and there is no requirement for additional maintenance from the municipality.

Summary

The proposed development is consistent with the Provincial Planning Statement as it demonstrates efficient development within an existing settlement area, provides for increased housing opportunities and protects natural heritage features. The proposed development provides for 21 detached dwelling lots that add to the existing housing supply in Morriston and Puslinch with a built form that is contextually appropriate for the area and servicing availability. The reduced lot sizes promote a more compact form of development while respecting the surrounding context and servicing levels. The proposed development provides for the appropriate extension of the municipal road network with the expansion of Ochs Street and the introduction of a new municipal road to service the detached dwellings.

Furthermore, the proposed development provides for the protection of the natural heritage features in the eastern and southern portion of the site with the appropriate rezoning to an Environmental Protection zone and providing a sufficient buffer to development. Lastly, stormwater management is to be provided via infiltration trenches and swales in accordance with the submitted Functional Servicing and Stormwater Management Report. In summary, it is our opinion that the proposed development is consistent with the Provincial Planning Statement.

Proposed Zoning By-law Amendment

The subject lands are currently zoned as “Urban Residential (UR)”, “Future Development 2 (FD2)” and “Natural Environment (NE)” with an “Environmental Protection Overlay” per Schedule A5 of Zoning ByLaw No. 023-18. A Zoning By-law Amendment is being submitted to rezone the subject lands from “Future Development 2 – FD2” and “Natural Environment – NE” to “Urban Residential - XX (UR - XX)” and “Natural Environment (NE)” with “Environmental Protection (EP)” overlay to facilitate the proposed development.

The following is a table which summarizes the zone requirements as well as the proposed standards (Table 1):

Zoning Standard	UR Requirement	Proposed
Minimum Required Lot Area	0.4 ha	0.19 ha (minimum)
Minimum Required Lot Frontage	18 m	25 m
Minimum Required Front Yard	3 m	3 m
Minimum Required Interior Side Yard	2 m	2 m
Minimum Required Exterior Side Yard	3m	3 m
Minimum Required Rear Yard	6 m	6 m
Maximum Permitted Lot Coverage	45%	45 %
Maximum Permitted Building Height	11 m	11m
Minimum Required Open Space	15%	15%

Table 1. Required and Proposed Zoning Standards

Based on Table 1, the following table provides the site-specific provision for the proposed development which includes additional residential uses, home businesses and private home daycare as permitted uses. These permitted uses are evaluated below.

Zone Designation	Permitted Uses	Prohibited Uses	Site Specific Provision
Urban Residential (UR-XX)	Single Detached Dwellings Additional Residential Units Home Businesses Private Home Daycare	N/A	Minimum Required Lot Area = 0.19 ha

Table 2. Proposed Zoning By-law Amendment Site Specific Provision

Additional Residential Units and Home Businesses

The permitted uses identified in the Zoning By-law Amendment being additional residential units and home businesses (including private home daycare) are evaluated below.

County of Wellington Official Plan

The County Official Plan was approved by the Ministry of Municipal Affairs on April 13, 1999 and came into effect on May 6, 1999. The latest Office Consolidation was released in July 2024. In accordance with Schedule A7 – County Growth Structure – Puslinch and Schedule B7 – Puslinch Land Use, the subject lands are designated as a *Secondary Urban Centre* within the *Rural System*.

Secondary Urban Centres are intended to provide a range of land use opportunities including *residential uses of various types and densities, commercial, industrial and institutional uses....* As per policy 6.10.6 *An Additional Residential Unit may be allowed subject to the provisions of Section 4.4.6 of this Plan.* Section 4.4.6 states:

It is the policy of this Plan to authorize:

- a) The use of two residential units in a single detached dwelling, semi-detached dwelling or rowhouse; and*
- b) The use of a residential unit in a building or structure ancillary to a single detached dwelling, semi-detached dwelling or rowhouse.*

For additional clarity the intent of this policy is to allow up to a total of three residential units, which includes the primary dwelling unit, on eligible properties.

An Additional Residential Unit within a main residence or within an ancillary building on a property will not be permitted within hazardous lands as defined and regulated by the Local Conservation Authority.

An Additional Residential Unit will be required to be serviced by appropriate water and wastewater services in a manner that is acceptable to the local municipality. Additional Residential Units located within vulnerable areas designated under the Clean Water Act may be permitted subject to the applicable Source Protection Plan policies and the policies in section 4.9.5 of this Plan.

Additional residential units are permitted within a single detached dwelling in accordance with the County Official Plan. As stated in the letter prepared by Crozier dated November 15, 2024 additional residential units and home businesses are not expected to significantly increase sanitary flows and would be dependent on the number of additional fixtures required for a home business. If no additional fixtures are required, there would be no need to increase the sanitary capacity. The proposed lot fabric also allows for larger sanitary systems or sanitary improvements if necessary. Private servicing capacity will need to be reviewed at the building permit stage to ensure it is acceptable to the Town's Standards.

Section 4.2.6 provides *General County Policies* that are relevant to the proposed development.

4.2.6 Home Business

Wellington County supports the trend towards more home-based businesses and will facilitate new home business through planning policy. The opportunity to work from home will be encouraged.

In the Urban System, home businesses will be small in size and normally restricted to the occupants of the property. These uses will be oriented towards providing services rather than retail functions. Compatibility with surrounding residential development is a primary consideration.

In the Rural System, home businesses similar to those allowed in the Urban System are encouraged.

Section 6.4.4 also regulates home businesses within the *Rural System*. The following policies are relevant to the proposed development:

6.4.4 Home Businesses and Farm Businesses

Home businesses are home occupations and home industries that are secondary to the principal use of the property and may be allowed, subject to zoning provisions, as a means of supplementing farm incomes and providing services in agricultural areas and may include:

- *small home occupations conducted from the main residence with employment normally limited to the occupants of the property – examples include bed and breakfast, day care, hairdresser, and professional services;*

In accordance with the County OP additional dwelling units and home businesses are encouraged and permitted within the *Secondary Urban Centre* designation. The letters provided by Crozier and Englobe demonstrate that the additional dwelling units and home businesses are not expected to have a significant effect on private water and sewage facilities which can be further reviewed through the building permit process, should a future homeowner have a desire to provide an additional residential unit or establish a home business. Additionally, the addendum letter prepared by Colville, November 13, 2024 highlights that these additional uses are not expected to have adverse effects to environmental features on the subject lands. The letter prepared by GHD, dated November 13, 2024 shows that there are no concerns from a traffic or parking perspective. Therefore, the proposed development conforms to the County of Wellington Official Plan.

Township of Puslinch Zoning By-law 023-18

The proposed Zoning By-law Amendment seeks to rezone the subject lands from *FD2* and *NE* to *UR - XX* and *NE* with *EP* overlay. As per table 6.1 *Residential Zone Permitted Uses* the *UR* zone permits accessory apartments, home businesses, single-detached dwellings, and more.

The following provisions regulate accessory dwelling units and home businesses within the Township Zoning By-law:

4.2 Accessory Apartments

a. Where permitted by this By-law, a maximum of one accessory apartment shall be permitted per single detached, semi-detached, or townhouse dwelling, provided that:

i. the maximum floor area shall not exceed 40 percent of the floor area of the principal dwelling unit to a maximum of 130 m²; and

ii. individual on-site sewage and water services are approved for the lot and have adequate capacity for the accessory apartment and any other uses on the lot.

4.11 Home Businesses

a. Where permitted, home businesses shall be permitted in accordance with the following provisions:

i. At no time shall any home business employ more than one on-site employee who does not reside in the dwelling unit to which such home business is accessory;

ii. A maximum of two home businesses may be permitted in a dwelling unit provided each home business can meet the requirements of this By-law;

iv. The maximum total floor area dedicated to all home businesses on a lot shall not exceed the lesser of 25 percent of the floor area of the dwelling unit on the lot or 50 m². The maximum total

floor area dedicated to home businesses includes any home business operated in an accessory structure in accordance with subsection (iii).

v. The home business shall be clearly incidental and secondary to the principal residential use to which it is accessory and shall not change the residential character of the dwelling unit.

vi. No home business shall create or become a public nuisance, particularly with regard to noise, traffic, emissions, parking or radio or television interference.

vii. The following uses are specifically prohibited as home businesses: 1) adult entertainment establishment; 2) animal clinic or agricultural animal clinic; 3) any use involving the storage, repair, maintenance and/or towing of vehicles or engines; 4) bed and breakfast establishment; 5) contractor's yard; 6) hospital; 7) industrial use; 8) warehouse; 9) kennel; 10) restaurant; 11) retail store; 12) salvage yard; 13) truck terminal; or 14) funeral establishment.

Accessory apartments and home businesses are permitted within the *Urban Residential* zone. Any additional residential units or home businesses would be subject to the provisions within the Town's Comprehensive Zoning By-law 023-18. For these reasons, we believe that the proposed development complies with the provisions of Zoning By-law 023-18.

Conclusion

The proposed development is consistent with the Provincial Planning Statement by promoting efficient development within an existing Settlement Area, increasing housing opportunities, and protecting natural heritage features. The development features reduced lot sizes for a more compact form while respecting the surrounding area and service levels. Additionally, the development protects natural heritage features in the eastern and southern parts of the subject lands by rezoning these areas to Environmental Protection zone and providing adequate buffers. Overall, the development is consistent with the new Provincial Planning Statement.

The proposed Zoning By-law Amendment has since been updated to include additional residential units, home businesses, and private home daycares as permitted uses. These additional uses are not expected to have negative impacts on the overall development or surrounding lands. The supplementary letters prepared by Crozier, Englobe, GHD, and Colville express how these uses can be accommodated without adverse impacts to a servicing, traffic, and natural features and functions.

Based on the analysis contained in both the Planning Justification Report prepared by Weston Consulting dated March 4, 2023, updated September 2024 and this Addendum Letter, it is our opinion that the proposed Zoning By-law Amendment and Draft Plan of Subdivision Application are justified and represent good planning.

Yours Truly,
Weston Consulting
Per:



Kayly Robbins, MPL, MCIP, RPP
Senior Planner

c. WDD Main Street Inc.