

# Planning Justification Brief

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## 3024 Old Beverly Road

12649161 Canada Inc.

Township of North Dumfries

Consent Application

June 2026



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**Prepared for:**

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# 1. Introduction

## 1.1 Background

GSP Group (“GSP”) has prepared this Planning Justification Report (“PJR”) in support of a Zoning By-law Amendment Application and Consent Applications (“Subject Applications”) being made by 12649161 Canada Inc. (“Owner”) for the property municipally addressed as 3024 Old Beverly Road (“Site”) in the Township of North Dumfries. The Site is shown on **Figure 1**.

The Subject Applications seek approval to create five new residential building lots and to retain one lot.

The proposed Lotting fabric will be as follows:

| Proposed Lot | Lot Area | Lot Frontage |
|--------------|----------|--------------|
| Lot 1        | 0.99 ha  | 34.9m        |
| Lot 2        | 0.97 ha  | 34.9m        |
| Lot 3        | 0.95 ha  | 34.9m        |
| Lot 4        | 0.94 ha  | 34.9m        |
| Lot 5        | 1.73 ha  | 44.4m        |
| Retained Lot | 5.73 ha  | 145.2m       |

The creation of new residential lots will require a Zoning By-law Amendment application as a condition of approval for the Consent Applications to ensure proper land use and protection of natural features. The application will establish site-specific zoning for each of the lots with defined limits of development land (areas where a dwelling can be built) and areas of natural heritage features and buffers (non-developable area). The developable portion of the lots will be zoned Z.2a Rural Residential and the natural environmental areas will be zoned Z.12B (Environmental Protection Two zone). The retained lot will remain within the Z.1 Agricultural zone. Additionally, the current Site-Specific Zoning Exemption (20.1.65) on the property will be removed.

## 1.2 Pre-Consultation

A Pre-consultation Application was submitted and comments provided in October to December 2024. The Pre-consultation report noted the following requirements in support of the proposed lot creation:

1. Archaeological Assessment & Ministry Acknowledgement Letter (see below)
2. Submission Cover Letter
3. Completed Consent Application forms (1 application form for each new lot being created)
4. Consent Application Fees (we will provide an invoice to pay these fees, once all other items are submitted)
5. Consent Plan/Drawing (as per the drawing requirements on the Consent Application form). Including:
  - a. Dimensions and areas of each proposed lot, and the retained lot.
  - b. Location of natural features on the property, as determined through the staking of the wetlands.
  - c. The 30m buffer limit/boundary from the staked natural features, as per the EIS recommendations.
  - d. Setbacks shown for each lot (using the general zoning requirements of the Z.2a. zone, with a front yard setback requirement of 16 metres).
  - e. Approximate locations of existing/proposed septic tanks and wells.
6. Legal Survey
7. Scoped Environmental Impact Statement (already submitted)
8. Planning Justification Report
9. Traffic Impact Study
10. Site Grading/Drainage Plan(s)
11. Stormwater Management Report

Each of the above noted documents are to be provided with the proposed Consent Applications. This Planning Justification Report addresses both the Proposed Lot Creation along with the Proposed Zoning By-law Amendment.

### **1.3 Purpose and Scope**

This Report has been prepared in support of the Subject Applications and will provide planning justification for the proposed Lot Creation (Consent Applications) and Zoning By-law Amendment.

The objectives of this Report are as follows:

- To provide an overview of the Site, including site descriptions and surrounding uses;
- To provide a summary of the Subject Application;
- To provide a summary of existing planning policies and regulations that apply to the Site; and,
- To provide planning justification for the Subject Application.

## **2. Site Overview & Context**

### **2.1 Location and Description of Subject Property**

The Site is municipally known as 3024 Old Beverly Road, Township of North Dumfries and is legally described as Part 1, RP 67R834, Concession 9 Part Lot 1, North Dumfries. The Site is 11.3 hectares and is located at the northeast corner of Old Beverly Road and Robinson Road within the Township of North Dumfries. Land located on the west side of Robinson Road is located within the City of Cambridge. The site is rectangular in shape.

The site contains fallow agricultural fields along the east, a dwelling and separate garage situated to the rear of a large lawn area along the west and wooded areas within the central part of the property. Access to the dwelling on the property is via an existing driveway connected to Old Beverly Road. A field access is also provided to the fields at the east of the property from Old Beverly Road.

### **2.2 Surrounding Context**

Surrounding the Site are agricultural lands, rural residential development and forested lands to the north; Old Beverly Road, forested land and Ayr Coach lines to the southeast, Bomet Recycling and Cambridge Auto Wreckers to the southwest, residential to the west (within the City of Cambridge on the west side of Robinson Road) and agricultural lands to the east.





## 4. Policy Analysis

### 4.1 Provincial Planning Statement 2024

The Provincial Planning Statement (“PPS”) provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS is issued under Section 3 of the Planning Act and came into effect on October 20, 2024. The following provides a summary of the key PPS policy considerations for the Site and provides justification for the Proposed Development as it relates to these policies.

Policy 2.1.6 of the PPS states that planning authorities should support the achievement of complete communities by: accommodating a range and mix of land uses, housing options [...], and other uses to meet long-term needs (a). Policy 2.2.1 states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: permitting and facilitating (b): all housing options required to meet the social, health, economic and well-being requirements of current and future residents [...] (1); and, all types of residential intensification, [...], 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 (2).

Response: The Subject Application will result in the creation of five new rural residential lots plus a retained lot which will result in the eventual construction of five new single-detached dwellings, contributing to meeting of the social, health, economic and well-being requirements of current and future residents. The Site currently contains one existing dwelling which will be maintained. Approval of the consent applications will result in the opportunity to introduce new housing in an area directly adjacent and south of existing rural residential dwellings and will result in a net increase in residential units within the surrounding area.

Policy 2.5.1 of the PPS states that healthy, integrated and viable rural areas should be supported by: building upon rural character and leveraging rural amenities and assets (a); using rural infrastructure and public service facilities efficiently (d). Policy 2.6.1 states that on rural lands located in municipalities, permitted uses are: residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services (c). Policy 2.6.2 states that development that can be sustained

by rural service levels should be promoted. Policy 2.6.3 states that development shall be appropriate to the infrastructure which is planned or available and avoid the need for the uneconomical expansion of this infrastructure. Policy 2.6.5 states that new land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.

Response: The Proposed Development builds upon rural character and leverages rural amenities and assets and includes the creation of five rural residential lots, which has been designed to be compatible with surrounding development. The proposed severed lots have been reviewed for serviceability (private well and septic) and have been confirmed to have the ability to accommodate appropriate sewage and water services. Development will utilize private servicing and will not require the provision of infrastructure or expansion of existing infrastructure. The Proposed Development is located directly adjacent to existing residential development and in all directions is bisected by intervening land uses that would “first in-line” to any further adjacent agricultural operations that would create greater MDS impacts than the Proposed Development, as such there is not an anticipated MDS setback requirement.

#### **4.1.1 Provincial Planning Statement Summary**

The Proposed Development is consistent with the Provincial Planning Statement as it results in a compatible form of rural residential development that, upon the eventual construction of five single-detached dwellings, will contribute a compatible form of housing already found on the west side of Robinson Road. The Proposed Development has been confirmed to have the ability to accommodate private servicing. The Proposed Development complies with the minimum distance separation formulae.

## **4.2 Region of Waterloo Official Plan**

The Region of Waterloo Regional Official Plan (“ROP”) was approved by the Ministry of Municipal Affairs and Housing, with modifications, on December 22, 2010, and approved with amendments by Oral Decision of the Ontario Municipal Board on June 18, 2015.

Regional Official Plan Amendment No. 6, which establishes the planning framework for accommodating forecasted population and employment growth within the Region to 2051, was approved by the Minister of Municipal Affairs and Housing on April 11, 2023. ROPA 6 established a new policy framework with the implementation of Chapter 2 – Where and How to Grow, as well as new housing policies in Section 3.A, among other policy matters.

As of January 1, 2025, the Province of Ontario has removed the Region of Waterloo's Planning Authority, and the ROP became an Official Plan for each of the area municipalities, including the Township of North Dumfries. The following is a review of the Proposed Development with respect to the relevant policies of the ROP.

The Site is designated Rural Area and Protected Countryside on Map 7 – The Countryside, in the ROP (**Figure 3**).

Policy 6.C.1 of the ROP states that new land uses, including the creation of separate lots, expansion of existing lots and the development of new or expanding livestock facilities, will comply with the minimum distance separation formulae.

Policy 6.E.1 of the ROP states that development applications to create a new residential lot within the Rural Areas designation, or which would otherwise result in the creation of a new residential lot, will not be permitted except in the following circumstances: within the Rural Areas designation, to create new infill lots for residential purposes within an existing grouping of rural residential lots that has not been designated in an area municipal official plan as a Rural Settlement Area, subject to Policy 6.E.10.

Policy 6.E.10 states that within the Rural Areas designation, area municipalities may permit the creation of new lots for residential infill purposes within an existing grouping of rural residential lots that has not been designated as a Rural Settlement Area within the area municipal official plan, provided that: the existing grouping of lots accommodating the proposed infilling lot(s) presently consists of a grouping of four or more non-farm lots, with each unit or lot separated from each other by no more than 100 metres on the same side of an open public road (a); the new lot has a maximum area of one hectare, except where natural features or existing lot patterns justify the inclusion of additional lands (c); the new lot can be appropriately serviced by private wells and individual wastewater treatment systems (e).

**Response:** There is an existing conformity gap between the Regional Official Plan and the Provincial Planning Statement. To address this conformity gap Township Staff are working on establishing a Rural Interim Practice with respect to rural lot creation, this Rural Interim Practice is to be approved in the form of a Township initiated Official Plan Amendment to ensure the Township Official Plan is in conformity with the 2024 PPS. Note the Regional Official Plan is now also a Township Official Plan following the removal of Regional Planning Authority in January 2025.

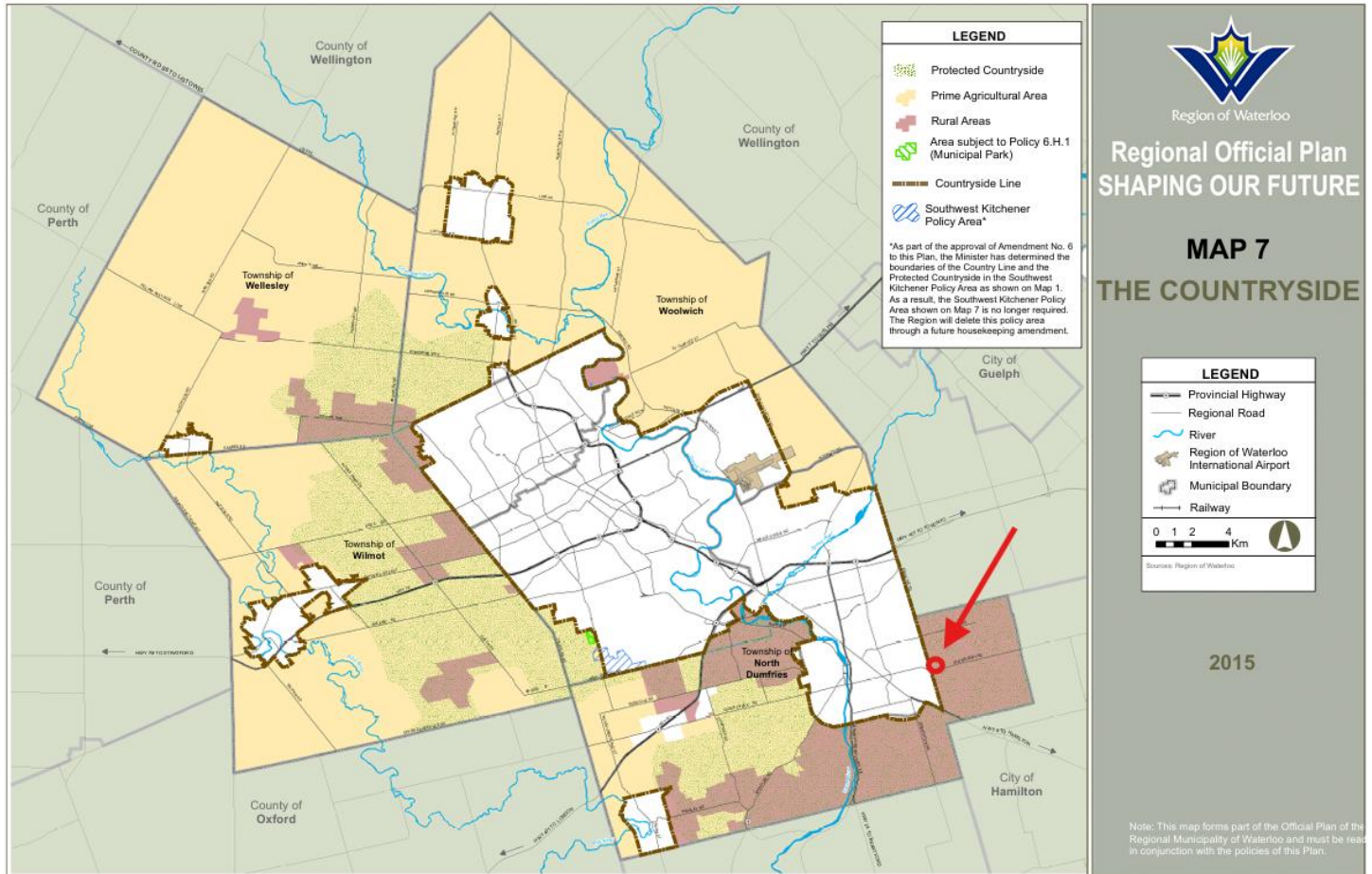
The Proposed Development will see the creation of five new residential lots and the retention of an agricultural parcel. The lots to be created are all roughly around one hectare in area (ranging from 0.93 ha to 1.73 ha) and the retained lot being 5.73 ha in area. The size of the lots is dictated in part by the existence of a wetland on the property. A Zoning By-law Amendment is proposed to rezone the developable areas of the lots to an appropriate Z-2a Rural Residential Zoning and the non-developable areas of the lots to a Z-12B Environmental Protection Two Zone.

The underlying intent of the regional policy framework is to allow modest rural residential infill within existing groupings of non-farm lots, subject to servicing feasibility, land use compatibility, and protection of agricultural and environmental functions. The Proposed Development satisfies the direction of these policies. Given the existing conformity gap between the Regional Official Plan and the PPS, the Proposed Development is consistent with the PPS and conforms to the intent of the Regional Official Plan.

#### **4.2.1 Regional Official Plan Summary**

The Proposed Development conforms to the ROP by contributing a compatible form of rural residential infilling that complies with MDS requirements. The intent of the Regional Official Plan is to allow reasonable development on rural lands subject to sufficient review of servicing feasibility, environmental protection, agricultural impacts and overall compatibility. For the reasons outlined above and based on the supporting studies prepared in support of the Proposed Development it is concluded that the Proposed Development conforms to the intent of the Regional Official Plan.

**Figure 1 – Region of Waterloo Official Plan**



### 4.3 Township of North Dumfries Official Plan

On December 16, 2013, the Township of North Dumfries adopted Official Plan Amendment No. 26 to update the Official Plan to bring it into conformity with the Regional Official Plan, the Growth Plan for the Greater Golden Horseshoe and to ensure consistency with the Provincial Policy Statement.

The Region of Waterloo approved Official Plan Amendment No. 26, with modifications, on August 21, 2014, under Section 17 and 26 of the Planning Act.

The following is a review of the Proposed Development with respect to the relevant policies of the Township of North Dumfries Official Plan ("Official Plan").

The Site is designated Rural Area and Protected Countryside on Map 7 – The Countryside, in the Township Official Plan (**Figure 4**).

Policy 2.10.1 of the Official Plan states that development applications to create a new non-farm related residential lot within the rural areas designation, will not be permitted except in the following circumstances: within the rural areas designation, to create new infill lots for residential purposes within an existing grouping of rural residential lots that has not been designated in this Plan as a Rural Settlement Area, subject to Policy 2.10.3 (b).

Policy 2.10.3 states that within the rural areas designation, the Township may permit the creation of new lots for residential infill within an existing grouping of residential lots that have not already been designated as a Rural Settlement Area in this Plan, provided that: the existing grouping of lots accommodating the proposed infilling lot(s) presently consists of a grouping of four or more non-farm lots, with each unit or lot separated from each other by no more than 100 metres on the same side of an open public road (a); the new lot has a maximum area of one hectare, except where natural features or existing lot patterns justify inclusion of additional lands (c); the new lot can be appropriately serviced by private wells and individual wastewater treatment systems (d).

Response: As noted in the review of the Regional Official Plan review, there is an existing conformity gap between the Township Official Plan and the Provincial Planning Statement. To address this conformity gap Township Staff are working on establishing a Rural Interim Practice with respect to rural lot creation, this Rural Interim Practice is to be approved in the form of a Township initiated Official Plan Amendment to ensure the Township Official Plan is in conformity with the 2024 PPS.



The Proposed Development will see the creation of five new residential lots and the retention of an agricultural parcel. The lots to be created are all roughly around one hectare in area (ranging from 0.93 ha to 1.73 ha) and the retained lot being 5.73 ha in area. The size of the lots is dictated in part by the existence of a wetland on the property. A Zoning By-law Amendment is proposed to rezone the developable areas of the lots to an appropriate Z-2a Rural Residential Zoning and the non-developable areas of the lots to a Z-12B Environmental Protection Two Zone.

Policy 3.1.3.1 of the Official Plan states that all proposed development, or any new/expanded livestock barns and manure storage facilities will conform with the Minimum Distance Separation (MDS). The MDS will be determined through the Minimum Distance Separation Formulae I and II.

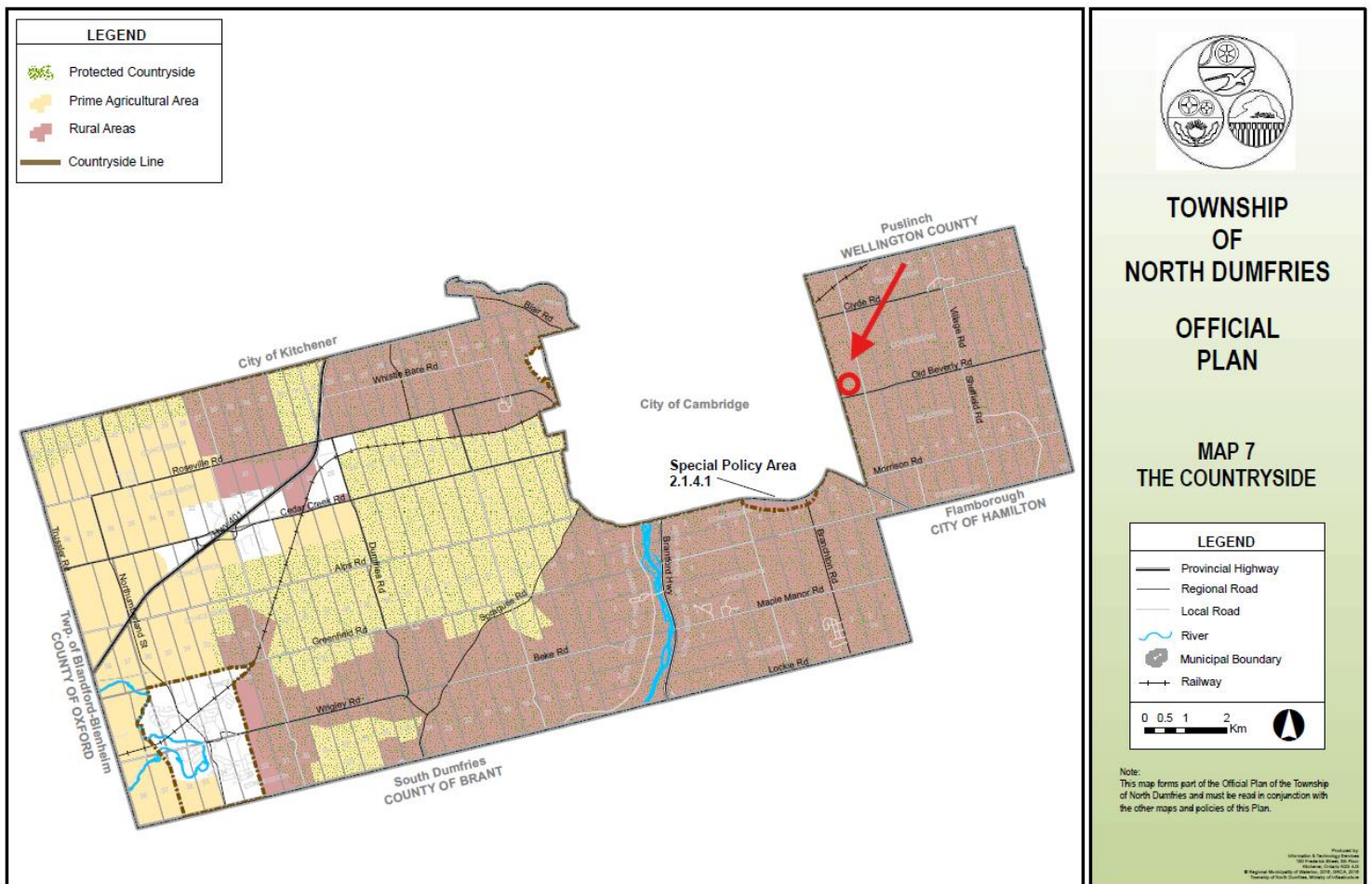
Response: Through a review of surrounding land-uses it has been determined that any agricultural operations are bisected from the Site by intervening land uses. As such, any MDS buffers or constraints will be caused by existing surrounding land uses and the Proposed Development is not anticipated to create any new MDS buffer or radius setback encroachments.

#### **4.3.1 Official Plan Summary**

The Proposed Development conforms to the Official Plan by contributing a compatible form of rural residential infilling that does not create an MDS impact, would create five new residential lots that essentially mimic existing development directly adjacent to the north and west of the Site and can be adequately serviced by private individual well and septic systems. The natural features on the Site will be buffered and preserved in their natural state.



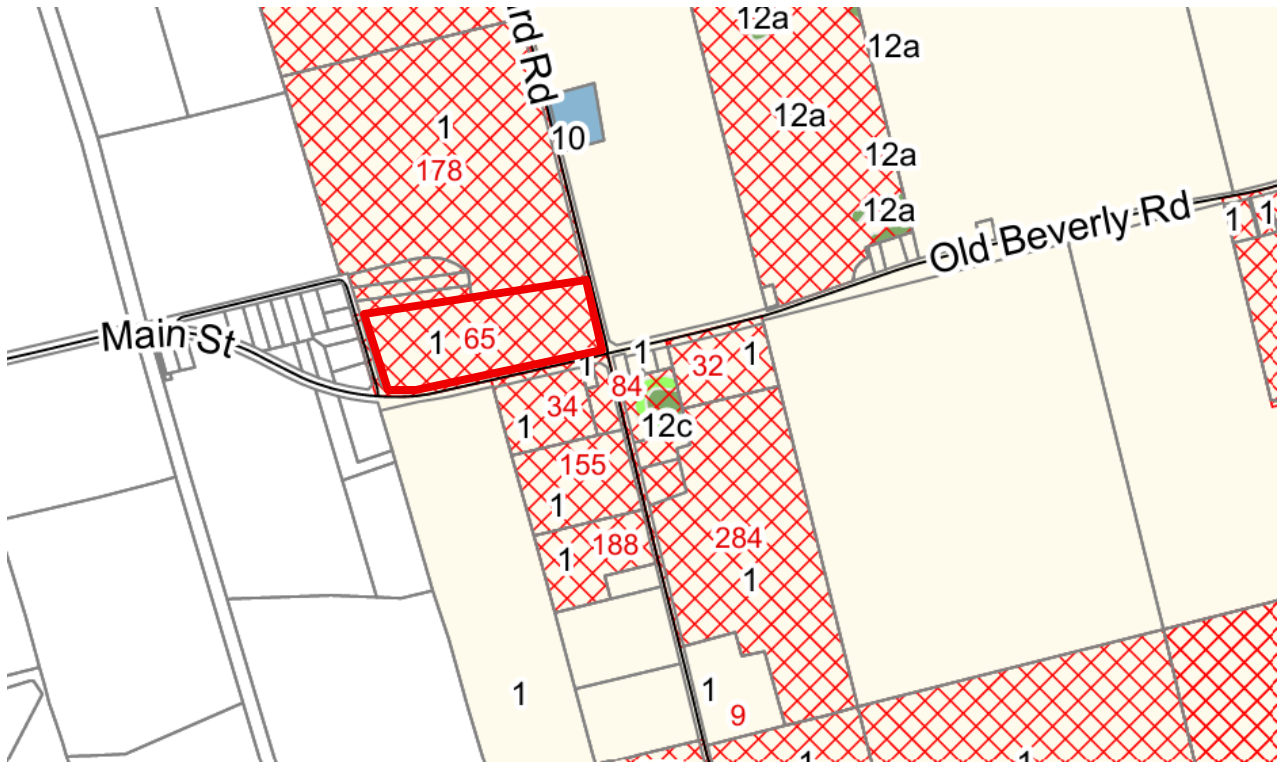
**Figure 2 – Township of North Dumfries Official Plan**



#### 4.4 Township of North Dumfries Zoning By-law

The Site is currently zoned Z.1 – “Agricultural” Site-Specific Exemption 20.1.65 on “Zoning Map – East” in the Township of North Dumfries Zoning By-law 689-83 (**Figure 5**).

**Figure 5 – Township of North Dumfries Zoning By-law:**



The Subject Application seeks to rezone the Site from Z.1 – “Agricultural” to Z.2a – “Rural Residential and Z.12b “Environmental Protection Two”). The following is a summary of applicable zoning regulations from the Z.2a Zone:

**Table 1 – Z.2a Zone Requirements (Without Municipal Services)**

| Regulation     | Required     | Proposed (Z.2a-XX Zone) | Conforms (Y/N) |
|----------------|--------------|-------------------------|----------------|
| Min. Lot Area  | 0.4 hectares | 0.93 hectares           | Y              |
| Min. Lot Width | 30 metres    | 34.9 metres             | Y              |

#### **4.4.1 Justification for the Proposed Zone Change from Z.1 – Agricultural to Z.2a – Rural Residential**

The Proposed Development represents a compatible form of rural residential infilling which will result in the eventual construction of housing that leverages rural amenities and will contribute toward the creation of a complete community. While plans have not yet been finalized for each of the dwellings, conceptual building envelopes have been established and evaluated in support of future home construction.

As outlined in the summary of the supporting technical reports provided below the Proposed Development has been evaluated in terms of serviceability, environmental protection, traffic impacts, cultural heritage impacts and hydrology. Collectively, these supporting studies and the expert opinions provided therein support the Proposed Development in terms of functionality, public safety and environmental protection.

## 5. Supporting Studies

### 5.1 Environmental Impact Study

An Environmental Impact Study was completed by Greer Galloway dated October 2025. The EIS identified that the property is not within Significant Woodland, Significant Wildlife Habitat or Significant Habitat for Endangered and Threatened. However, three species listed in the SARO and Schedule 1 of the SARA are present. Impacts to significant natural heritage features and their functions are not anticipated, as sufficient area is available outside the wetland and measures to avoid and/or compensated harm to SAR have been recommended. If future development is proposed in the retained land, a Butternut Health Assessment Report should be prepared and submitted to the MECP to determine if an authorization under the ESA is required. An Ash Health Assessment will be required if restoration activities are performed within the wetland setback.

Provided that standard environmental protection practices are followed during construction and all development is outside the wetland and its setback (VPZ); construction of new residential dwellings will not adversely affect the hydrologic functions of the wetland or the ecological value of the forest and wetland areas. Indeed, the naturalization and restoration of the VPZ will meaningfully improve the ecological health of the identified hydrologic features.

Impacts to groundwater and surface water are not expected as services required for the new lots will need to comply with applicable legislation regarding quality and quantity. It is recommended to maintain the undeveloped areas with current vegetation and/or remove invasive species and plant native species, and the driveways with gravel to continue allowing natural infiltration.

To protect the natural heritage features present in the property, as part of the Consent Application, the zoning in the new lots will change. The developable area within the new lots will be rezoned Z.2A Rural Residential. The large wetland and the 30 m setback will be zoned Z.12B Environmental Protection Two. The retained land which will occupy an approximate area of 5.5 ha will continue to be zoned Z.1 Agricultural. In addition, development should not be permitted in the two wetlands located in the retained land. Therefore, the proposed severance will comply with the PPS as the natural heritage features will be protected.

## 5.2 Preliminary Servicing

Meritech Engineering have prepared a Preliminary Servicing Letter in support of the Proposed Development dated June 2026. The Preliminary Servicing Letter reviewed the proposed form of private individual servicing for each of the parcels to be created. The letter confirms that the lot areas provided ensure adequate separation between buildings, wells, and septic systems. Wells are expected to be in the front yards and septic systems in the rear yards.

The status of the existing well and septic on Lot 5 will be reviewed further in the future. For now they are considered as existing services.

Stormwater drainage is to be maintained in the manner as it operations on site today. The existing drainage patterns on the property are not proposed to be changed. Grading plans respect the proposed Vegetation Protection Zone (30m buffer) and direct stormwater flows on the developed portions of the site to the front (towards Robinson Road).

## 5.3 Stage 1-2 Agricultural Impact Assessment

Lincoln Environmental Consulting completed a Stage 1-2 Agricultural Impact Assessment in March 2026. No archaeological resources were found within the study area and therefore no further archaeological assessment of the study area is required.

The Stage 2 (fieldwork) archaeological assessment was carried out on November 17th, November 18th, and November 19th, 2025 in accordance with the Ministry of Citizenship and Multiculturalism *Standards and Guidelines for Consultant Archaeologists* (Government of Ontario 2011).

Roughly 68% of the study area consisted of woodlot or manicured lawn. These areas were subject to test pit survey at 5-metre intervals in accordance with Section 2.1.2 of the MCM' 2011 *Standards and Guidelines for Consultant Archaeologists* (Government of Ontario 2011). Roughly 8% of the study area consisted of a residential structure with a detached garage and associated paved driveway. This area was considered to be visually disturbed and to not retain archeological potential. The remaining 24% of the study area consists of marsh and wetland and is depicted in the Topographic map in Figure 1. This area was considered to be low lying and wet and to not retain archaeological potential.

As noted, the Stage 2 assessment did not result in the identification of any archaeological resources.

## **5.4 Hydrogeology and Terrain Evaluation**

Green Gallow completed a Hydrogeology and Terrain Evaluation in June 2026. The purpose of the study was to complete a water supply and terrain evaluation in support of the Proposed Development and to demonstrate the availability of sufficient potable groundwater supply to service the Proposed Development. The report concluded:

1. The upper bedrock aquifer is able to meet normal residential water demands for the proposed new lots without adversely affecting existing water users in the area.
2. Based on our calculations and the proximity of the nearest wells, well interference problems are not anticipated for the proposed severances.
3. Water quality results from the samples taken during the pumping tests showed generally good water quality, with no exceedances of any parameters under MECP Guideline D-5-5 apart from iron and iron-related turbidity. Water treatment for iron is recommended as is ultraviolet sterilization.
4. The proposed new lots are large enough to accommodate private septic systems without exceeding nitrate loading limits established in MECP Guideline D-5-4.

## **5.5 Transportation Impact Brief**

A Traffic Impact Brief was completed by Salvini Consulting in support of the Proposed Development dated June 2026.

The Traffic Impact Assessment concluded that the Proposed Development will generate a very small number of peak hour vehicle trips. These trips can be accommodated within the existing road network without adverse operational impacts. Existing intersection conditions at Robinson Road and Old Beverly Road are good and will remain good following development. Sight lines are adequate, no queuing or stacking concerns are anticipated, and roadway capacity is more than sufficient to absorb the incremental traffic.

Sight distance along the Robinson Road frontage of the subject property was reviewed and no constraints were identified that would restrict driveway placement in accordance with typical residential standards.

## 6. Conclusion

GSP Group has been retained by 12649161 Canada Inc. to provide planning justification in support of the Proposed Development (creation of five new residential lots) at 3024 Old Beverly Road, which includes the rezoning of the Site from Z.1 – Agricultural, to Z.2a – Rural Residential and Z.12B – Environmental Protection Two Zone. The Site is currently designated Rural Areas and Protected Countryside in the Township of North Dumfries Official Plan and is currently zoned Z.1 – Agricultural Special Provision 20.1.65 in the Township of North Dumfries Zoning By-law 689-83.

This Planning Justification Report has undertaken a policy review and concludes that the Proposed Development (creation of five lots) and an implementing Zoning By-law Amendment Application are appropriate and represent good planning for the following reasons:

- The Proposed Development is consistent with the Provincial Planning Statement as it results in a compatible form of rural residential development that, upon the eventual construction of the proposed single-detached dwellings, will contribute a compatible form of housing, will utilize rural infrastructure that has been confirmed to have the ability to accommodate private servicing, and complies with the minimum distance separation formulae;
- The Proposed Development conforms with the intent of Region of Waterloo Regional Official Plan by contributing a compatible form of residential infilling that does not pose an MDS impact and generally conforms to intent of policy 6.E.10 and the Townships pending Rural Interim Practice for residential lot creation;
- The Proposed Development conforms with the Township of North Dumfries Official Plan by contributing a compatible form of residential infilling that generally conforms to policies 2.10.1 and 2.10.3 and the anticipated pending Rural Interim Practice for residential lot creation;



In summary, the Proposed Development contributes a compatible form of rural residential infilling, which will result in the eventual construction of single-detached dwellings that will contribute toward the creation of complete communities. The Proposed Development is consistent with the Provincial Planning Statement, conforms to the intent of the Region of Waterloo Regional Official Plan and Township of North Dumfries Official Plan, and represents good planning.

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