

# Planning Justification Report

## OFFICIAL PLAN AND ZONING BY-LAW AMENDMENT APPLICATIONS

3089 Greenfield Road, Township of North Dumfries, Region of Waterloo

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June 2026

Prepared For:

**Greenfield Mill Inc.**  
3089 Greenfield Road  
Ayr, ON  
N0B 1E0

Prepared By:

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## 1 INTRODUCTION

On behalf of Greenfield Mill Inc. (“Owner”), Baker Planning Group is submitting an Official Plan Amendment Application and a Zoning By-law Amendment Application (“Applications”) for land known municipally as 3089 Greenfield Road, Township of North Dumfries, Region of Waterloo (“Site”) (Figure 1). The Site is legally known as Part Lot 37, Concession 9, North Dumfries, Part 1, 67R-3370, North Dumfries. The Site is 1.76 hectares in size and has frontage on Greenfield Road.

The Site is situated in the settlement area of Greenfield, to the immediate north of the Village of Ayr. The historical location of the Greenfield Mill, the Site was originally developed for industrial and commercial purposes in 1865 by Mr. John Goldie. The Site was ideally situated, at the time, for a mill, given its access to the Grand River. The built form of the Site was largely influenced by historical land use and topographical variations. The parcel itself has an irregular configuration, as a result of historical land transfers.

The building that housed the former mill continues to stand on the Site; however, it has fallen into disrepair due to a prolonged vacancy. There is existing access to the developed portion of the Site from Greenfield Road.

The Owners are proposing a comprehensive redevelopment of the historical mill on the Site for use as an events facility (“Proposed Redevelopment”). The Proposed Redevelopment envisions the thoughtful restoration and adaptive reuse of the former mill building, transforming it into a refined event venue for weddings, celebrations, and community functions. This approach honours the Site’s historic character, while reinvesting in the property in a context-sensitive manner that brings life back to the space. Rather than replacing the existing structure, the project centres on preserving and revitalizing the mill’s architectural form, allowing its historic presence to remain a defining feature of the Site and within the surrounding community.

The reuse of the existing built infrastructure is a central strength of the proposal. By working within the footprint and structural framework of the former mill, the redevelopment minimizes land disturbance to supporting site functional elements, reduces the need for new construction, and maintains the site’s established relationship with its surroundings.

As part of the Applications, the Owner is proposing to acquire the 20.0-metre unopened road allowance from the Township of North Dumfries, which aligns with the eastern property limit, for access purposes.

The Site is designated and zoned as follows:

Regional Official Plan, 2015

- Map 3: Portion of the Site is “Rural Settlement Area”
- Map 4: “Significant Valleys” and “Core Environmental Features”
- Map 7: “Prime Agricultural Area”



Figure:  
**1**

**SITE**

Site Location: Greenfield Mill, Ayr, ON



### Township Official Plan, 2018

- Map 2.8: Rural Settlement Area
- Map 5A: Core Environmental Features and Significant Valleys
- Map 5B: Environmental Constraints Areas
- Map 5C: Hazard Lands
- Map 7: Prime Agricultural Area

### Zoning By-law No. 689-83

- “Zone 3 (Z.3)” - Rural Residential for the portion of the Site located within the Greenfield Rural Settlement Area
- “Zone 1 (Z.1) - Agricultural on the southern half of the Site
- Site-Specific Exemption 20.1.150 is applied to the subject property, which establishes minimum lot area and frontage requirements.

The Site is also within the Regulated Area of the Grand River Conservation Authority (“GRCA”), with slope-erosion and floodplain features. The Site is also a “Listed Heritage Resource” on the Township of North Dumfries Heritage Register and is located within the Greenfield Heritage Conservation District.

The Planning Justification Report (“Report”) is being prepared to fulfill the submission requirements set out by the Region of Waterloo, the Township of North Dumfries and the GRCA, per the letter dated October 2<sup>nd</sup>, 2024. In addition to the Planning Justification Report, the following technical studies have been prepared to support the Applications:

- Environmental Impact Study, prepared by Arcadis
- Stormwater Management and Functional Servicing Report, prepared by GEI Consultants
- Geotechnical Study and Slope Stability Study, prepared by CVD
- Stationary Noise Study, prepared by Arcadis
- Cultural Heritage Impact Assessment, prepared by The Biglieri Group
- Urban Design Brief, prepared by The Biglieri Group
- Traffic Impact and Parking Study Report, prepared by TraffMobility

It is acknowledged, per discussions with Township staff, that the Archaeological Assessment and Record of Site Condition will form part of the Site Plan Approval process. A Holding Provision is proposed within the Applications, requiring said studies prior to issuance of Site Plan Approval.

This Report provides a summary of the Proposed Development and the applicable land use policies, and addresses the appropriateness of the application and whether it constitutes good land use planning.

## 2 SITE

The Site is situated in the settlement area of Greenfield, to the immediate north of the Village of Ayr. The Site is 1.79-hectare in size and occupies a historically significant position within the Greenfield settlement area. Its location along the Greenfield Road corridor places it within a small but distinct cluster of heritage buildings, residential dwellings, and natural features that collectively define the character of the Greenfield community.

The Site has an irregular lot configuration, a condition that reflects more than a century of incremental land transfers, industrial expansions, and adjustments to accommodate the mill's operational needs. The topography of the Site is varied, with the developed portion situated on a relatively level plateau adjacent to Greenfield Road, while the rear and eastern portions of the property transition into steeper slopes associated with the Nith River valley system. These slopes form part of the Grand River Conservation Authority (GRCA) Regulated Area, which includes both slope-erosion hazards and floodplain features. The GRCA regulatory floodline, identified at elevation 286.60 metres, traverses the eastern portion of the Site and establishes a natural limit to development.

At the centre of the Site is the former Greenfield Mill, a multi-storey industrial building constructed in 1865. The building is a prominent and recognizable structure within the settlement area, characterized by its heavy timber framing, masonry walls, and utilitarian industrial form. Although the building retains much of its original architectural character, it has deteriorated significantly due to prolonged vacancy and exposure to the elements. The mill is listed as a heritage resource on the Township's Heritage Register and is located within the Greenfield Heritage Conservation District, underscoring its cultural and architectural significance. The building's siting, massing, and materials contribute to the historic identity of Greenfield and form an important visual anchor within the rural landscape.

The building complex is composed of two sections: 1) Six-storey building with interior timber structure and exterior mass masonry and brick walls, and; 2) Four-storey constructed with an interior timber structure and exterior horizontally laid timber plank walls (known as nail-lam timber). A Structural Memo Condition Assessment has been completed by Tacoma Engineers dated April 23, 2026. The Assessment concluded that the building is in poor condition and that restoration should be carried out as part of the redevelopment. It states that there would be significant reconstruction of the rear nail-lam wing, which "may make restoration of this area impractical from a project budget perspective.

The Site has historically been part of the Greenfield community and used for industrial purposes, which differs from the agricultural nature of nearby lands. The Greenfield Mill played a central role in the development of the Greenfield community, including the provision of notable saltbox workers' cottages that line Greenfield Road and supported mill employees.

The existing building is setback from Greenfield Road, with a front yard setback of approximately 50 metres, creating a generous landscaped forecourt that separates the structure from the roadway.

The building's side yard setbacks are similarly substantial, with a minimum of 38 metres on the west side and 19.8 metres to the rear property boundary.

There is substantial tree cover on the Site. According to NHIC, some woodland areas occur within the Site, particularly along the western portion of the property and in a small area along the eastern property line. Areas within the surrounding Study Area to the south and west along the Nith River corridor are well-treed and are also mapped as woodlands by MNR's NHIC and the provincial GEO dataset. Air photo interpretation confirms that mature tree cover previously existed along the western and northwestern portions of the Site; however, a tornado on August 17, 2024, resulted in the loss of most mature vegetation in these areas.

As per the Township of North Dumfries Official Plan (2018) Map 3A Transportation, Greenfield Road is a Local Road. Northumberland Street, located approximately 350 metres east of the Site, is designated as a Regional Road. Northwest of the Site is Provincial Highway 401, which provides regional highway access to the surrounding areas.

The Site has two planned cycling routes nearby as per the Township of North Dumfries Official Plan Map 3B Cycling Routes. Northumberland Street to the east and Wrigley Road to the southeast are both identified as future Planned Cycling Routes. Roseville Road, situated approximately 2.5 kilometres from the Site, is an Existing Cycling Route. Greenfield Road is a Local Road, as such it does not currently have any sidewalks near Site.

**Image 1: View of the Site from Greenfield Road (Looking South)**



Source: Baker Planning Group, 2026

**Image 2: View of the Existing Mill (Looking South)**



*Source: Baker Planning Group, 2026*

**Image 3: View of the Existing Mill with Existing Residential Properties (Looking South)**



*Source: Baker Planning Group, 2026*

## 2-1 AREA CONTEXT

The Site is located within the rural settlement area of Greenfield, immediately north of the Village of Ayr. For reference, the Site is 260 metres from the settlement area boundary of Ayr, and there is only 375 metres between the settlement areas of Greenfield and Ayr (Figure 2).

The Greenfield settlement area is designated as a heritage conservation district. The Greenfield community was settled by John Goldie, who originally came to Canada between 1817 and 1819 and settled in the area in 1844. He first started a sawmill, raceway and dam and established a grist and oatmeal mill in 1850. In 1865, the mill was enlarged with a plank wing to produce refined local wheat for an international market. The Greenfield community largely developed around the mill. There were several houses for the mill owners' family members, as well as a school.

Today, Greenfield generally consists of residential land uses, primarily single-detached dwellings. The lotting fabric is varied, largely due to fragmented development over the past century.

The land intervening between the Site and the settlement area of Ayr is characterized as a natural area associated with the Grand River. This land is located within the GRCA Regulated Area for steep slopes and floodplain. There is dense tree cover adjacent to the Nith River. While this land area has been identified for agricultural uses within the Region of Waterloo Official Plan, agriculture has never occurred on the land because it is not suitable due to the slopes and poor drainage.

To the north of Greenfield, the land is predominantly agricultural, including cash crops. Land to the east is industrial and commercial, with frontage on Northumberland Street.

### Image 4: Adjacent Residential Property on the South Side of Greenfield Road



Source: Baker Planning Group, 2026

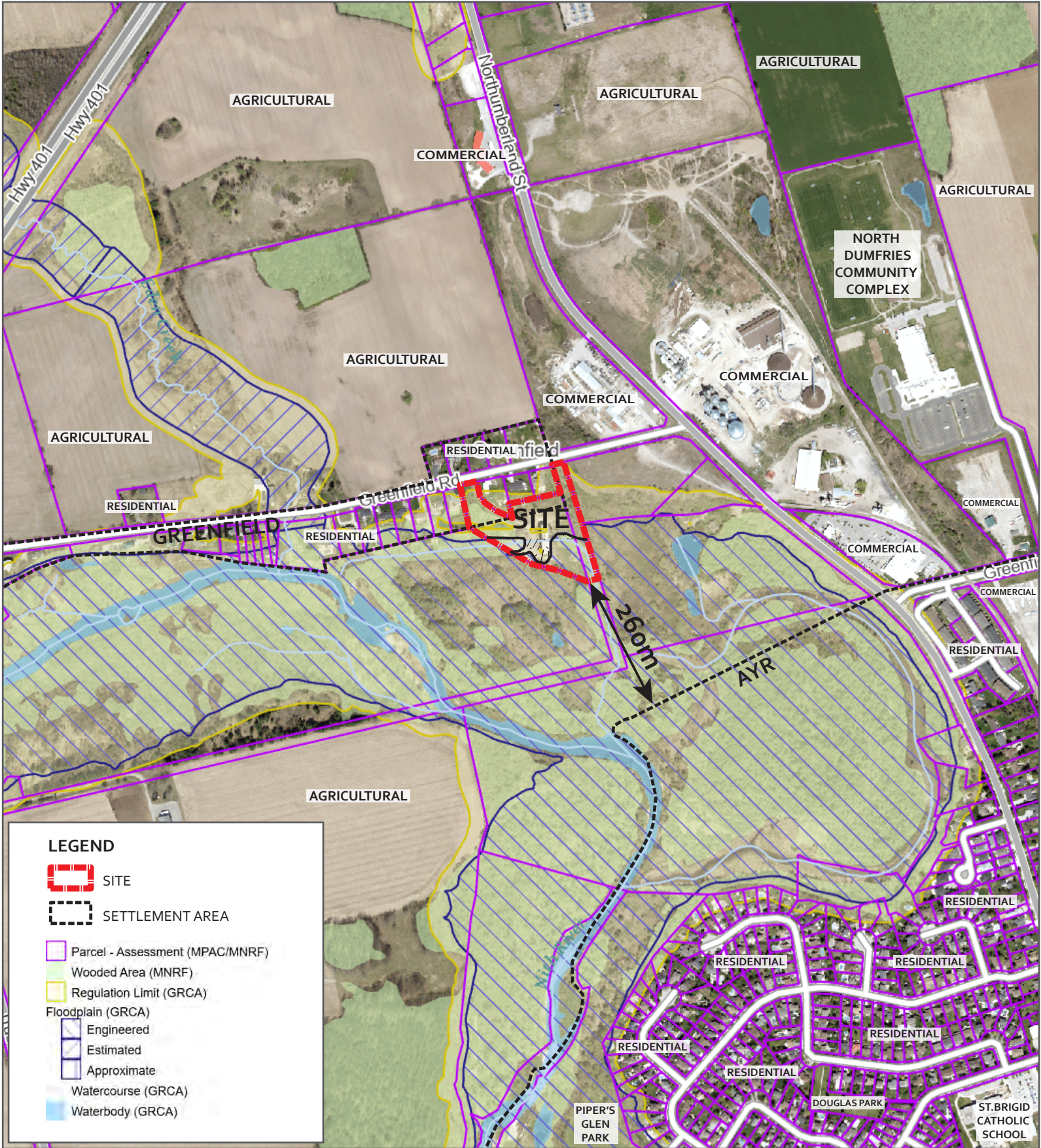


Figure:

2

# SURROUNDING LAND USES

Site Location: Greenfield Mill, Ayr, ON



**BAKER**  
Planning Group

Image 5: Adjacent Residential Property on the South Side of Greenfield Road



Source: Baker Planning Group, 2026

### 3 PROPOSED REDEVELOPMENT

The Owners are proposing a comprehensive redevelopment of the historical mill on the Site for use as an events facility (“Proposed Redevelopment”). The Proposed Redevelopment envisions the thoughtful restoration and adaptive reuse of the former mill building, transforming it into a refined event venue for weddings, celebrations, and community functions (Figure 3a to 3k). This approach honours the Site’s historic character, while reinvesting in the property in a context-sensitive manner that brings life back to the space. Rather than replacing the existing structure, the project centres on preserving and revitalizing the mill’s architectural form, allowing its historic presence to remain a defining feature of the Site and within the surrounding community.

The reuse of the existing built infrastructure is a central strength of the proposal. By working within the footprint and structural framework of the former mill, the redevelopment minimizes land disturbance to supporting site functional elements, reduces the need for new construction, and maintains the site’s established relationship with its surroundings.

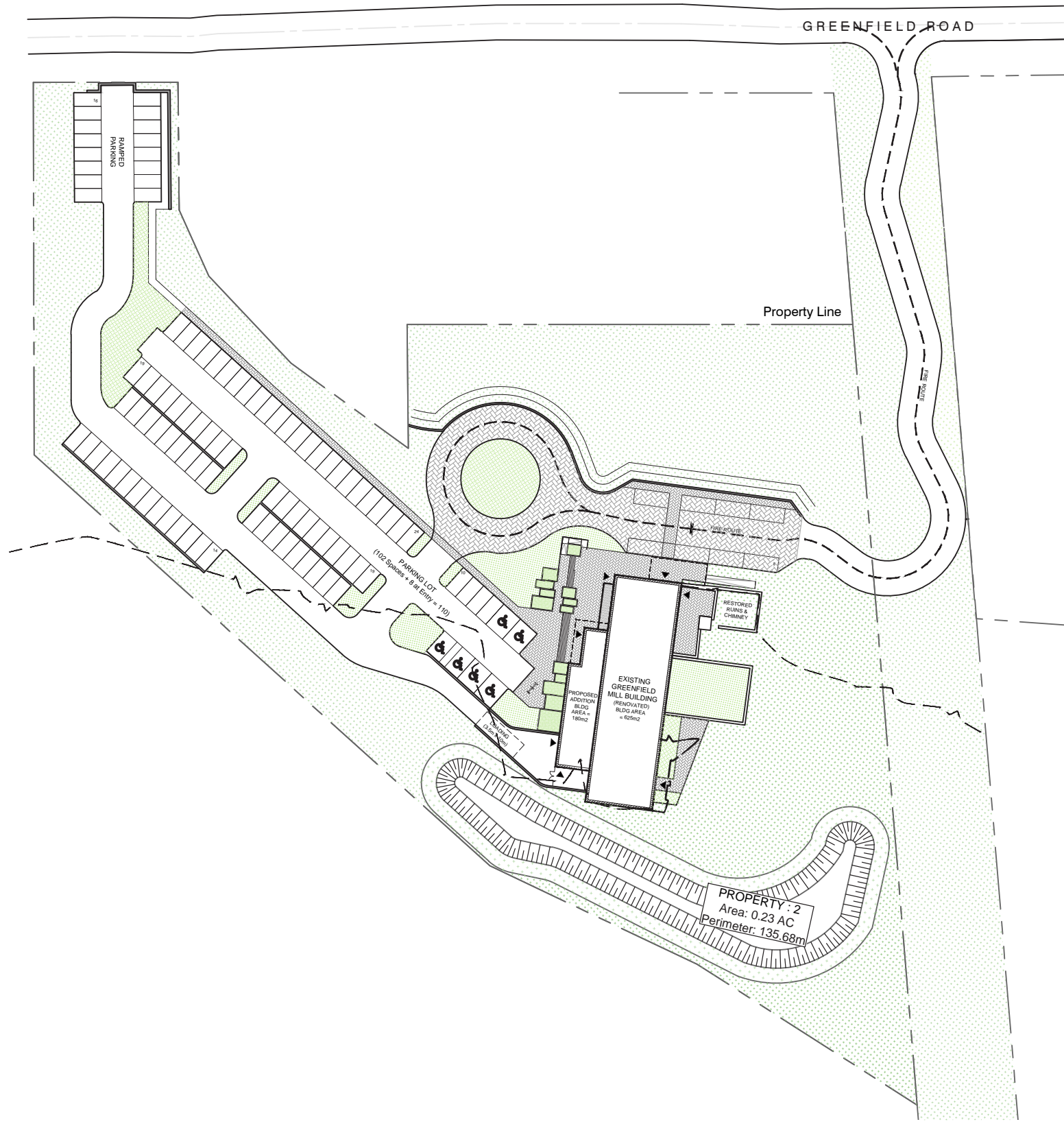
Respecting the heritage attributes of the former mill is fundamental to the Project Team's design philosophy. The Proposed Redevelopment will retain the building’s form, materials, and industrial character, ensuring that its historical significance remains legible. Architectural interventions will be sensitively integrated, focusing on restoration and minor enhancements that support the proposed use.

The adaptive reuse of the building includes the following:

- Removal of the existing plank (nail-lamb) wing (formerly operated as the grain house), retention of associated rubble stone foundation, and retention of stone foundation;
- Restoration of stone mill with the removal of the existing two-storey brick masonry addition above and restoration of the original gabled roofline;
- The construction of a new wing located south of the original stone mill with elevator;
- One-storey glazed addition above the restored stone mill;
- Filling in of select openings and extension of openings;
- Addition of accessibility features such as a ramp and new accessible entrances;
- New window frames and doors; and,
- Repurposing salvaged brick masonry for hardscaping and plank construction for installation and exposure within the new wing.

The proposed event space offers a distinctive setting for weddings, gatherings, and community events, supporting local tourism, encouraging economic activity, and providing residents with local amenities.

Overall, the Proposed Redevelopment of the former mill into a sensitively restored event space represents a thoughtful and responsible approach to heritage conservation. It preserves an important historic structure, introduces a compatible and desirable land use, and contributes to the social and economic fabric of the Township.



### SITE DATA & ZONING PROPOSED

**Township of North Dumfries**  
 3089 Greenfield, Ayr  
 Proposed: Zone 7

Total Site Area = 17,630 m<sup>2</sup> or 1.763 ha  
 Percentage of Landscape Open Space (excludes pond) = 60.4% (10,645 m<sup>2</sup>)  
 Total Building Area = 805m<sup>2</sup>  
 Total GFA = 2,251 m<sup>2</sup>

	REQUIRED	PROPOSED
Setback from Zones 2, 2a, 3, 4, 4a, 5	3.0 m of the boundary	min. 3.0 m (see below)
Buffer Strips	Required	min. 1.5 m at all side/rear yards
Minimum Lot Area	Area of the existing lot	1.763 hectares
Minimum Lot Frontage	Frontage of the existing lot	13.5 m Frontage
Maximum Building Height (at average grade)	Existing height	18.6 m
Off-Street Parking & Loading	As per zoning	110 +1 Loading
Minimum Rear Yard	7.5 m	18 m
Enclosed Buildings Requirement	All commercial uses	Event Center & Restaurant

BUILDING SETBACKS	'Front' Yard (North)	Side Yard(s)	Rear Yard (South)
Building (Existing)	50 m	38 m (min)	19.8 m
Building (Addition)	60 m	50 m (min)	23.7 m

MINIMUM REQ'D PARKING SPACES	REQUIRED	PROVIDED
• Surface Parking Spaces	n/a	110
• Loading (at Rear)	1	1
• Barrier free parking (4%)	5	6
<b>TOTAL</b>	n/a	110 Spaces

Figure:

3a

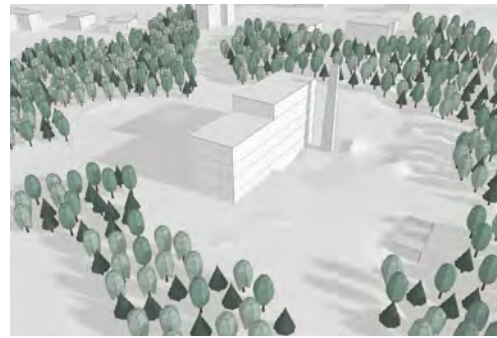
## CONCEPTUAL SITE PLAN

Site Location: Greenfield Mill, Ayr, ON

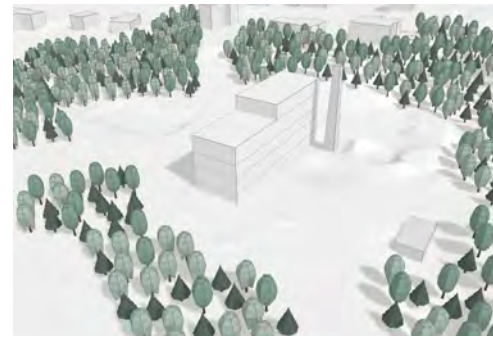


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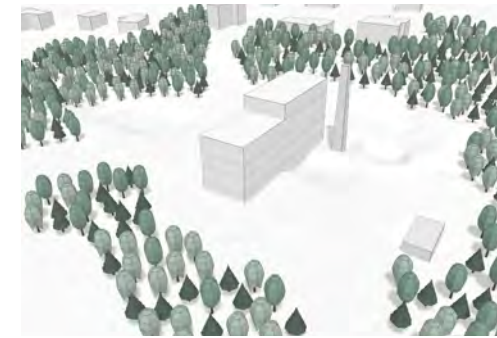
JUNE 21



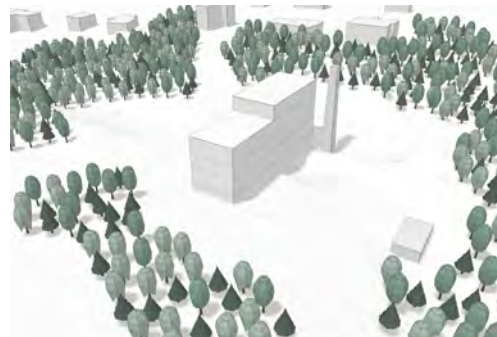
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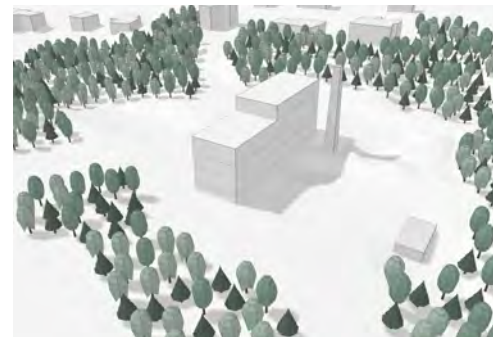
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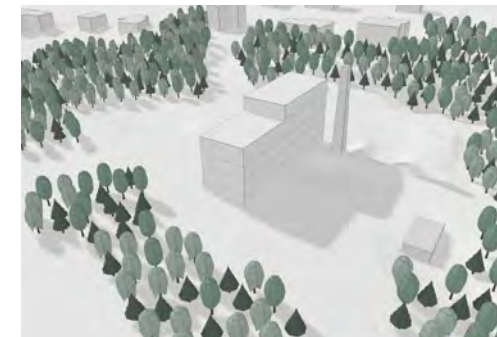
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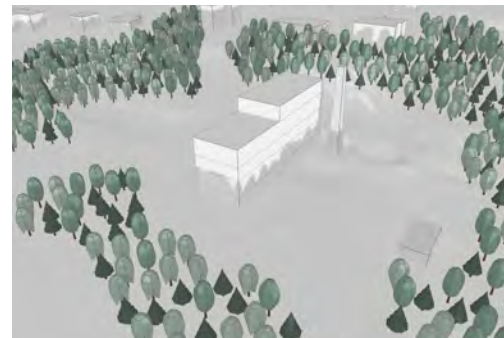


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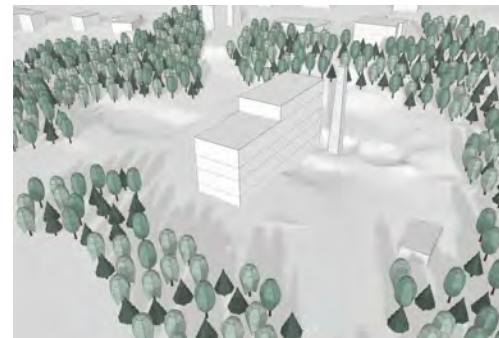


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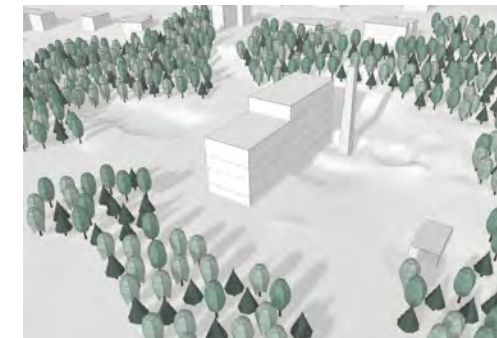
DECEMBER 21



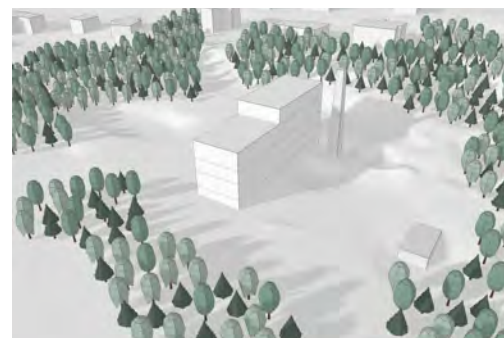
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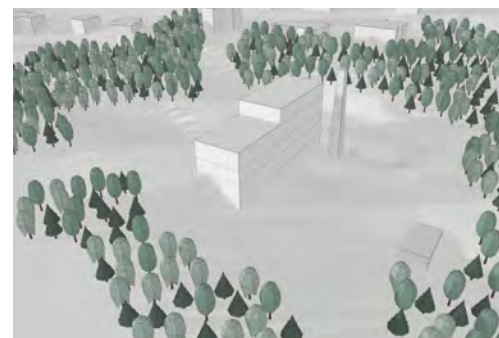
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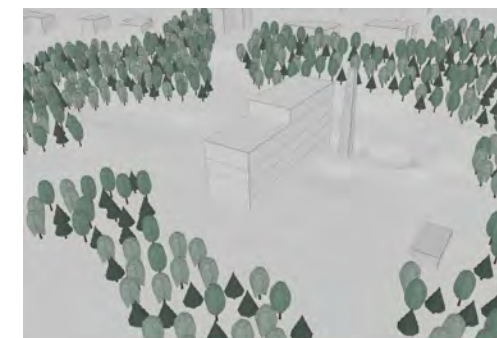
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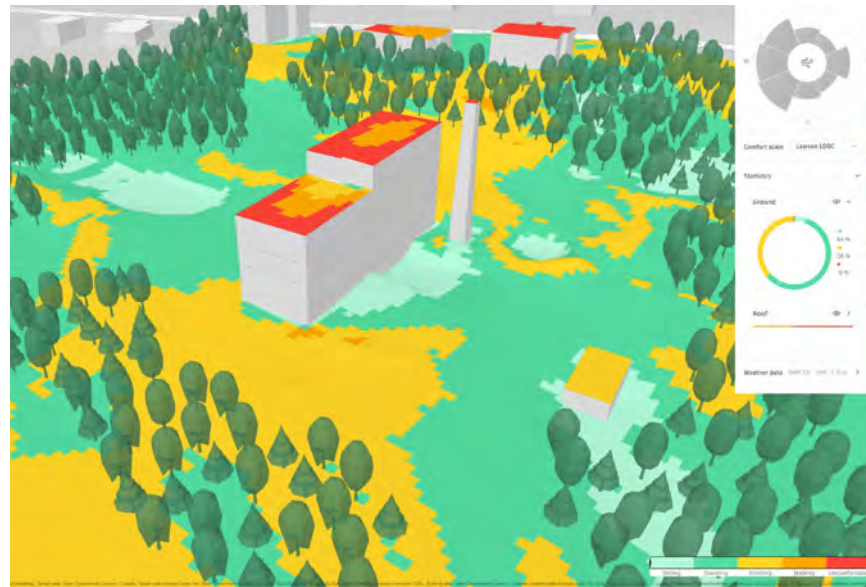
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Figure:

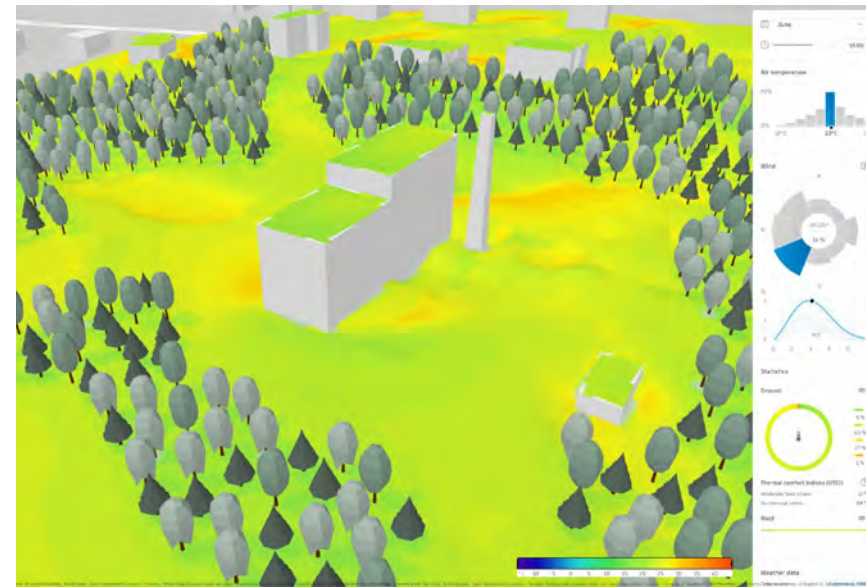
3b

# SHADOW STUDIES

Site Location: Greenfield Mill, Ayr, ON



WIND COMFORT LEVEL



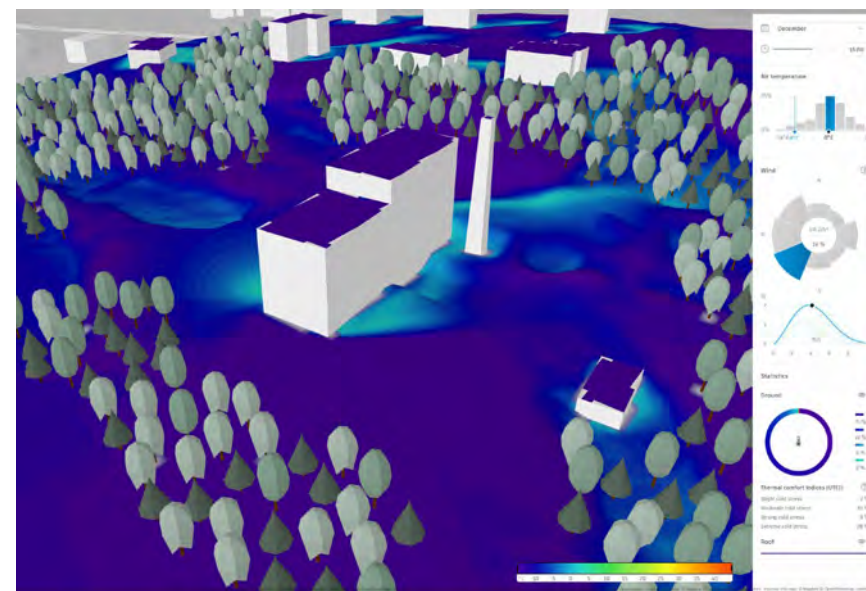
MICROCLIMATE - JUNE



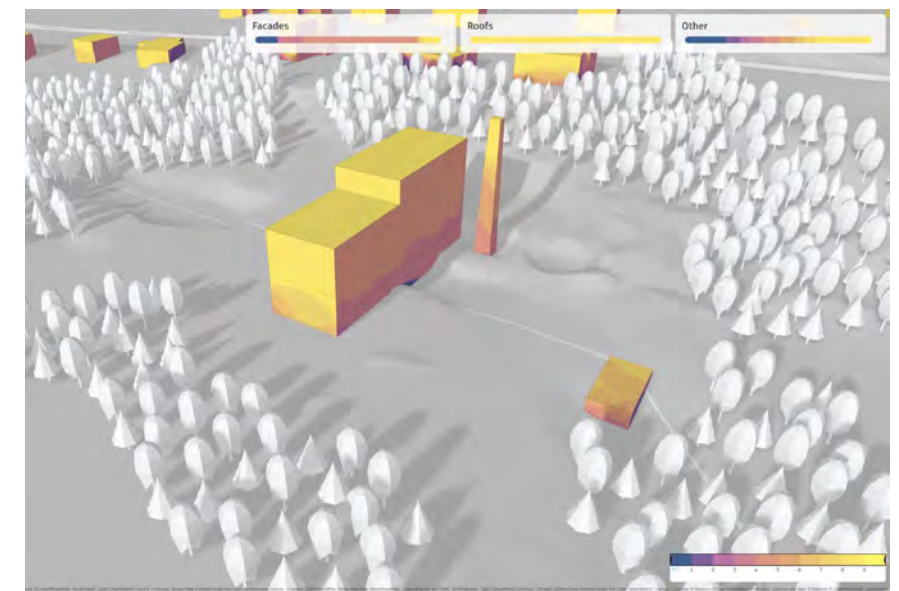
SUN HOURS - JUNE 21



WIND DIRECTION (PREDOMINANT SW WINDS)



MICROCLIMATE - DECEMBER



SUN HOURS - DECEMBER 21

Figure:

3C

## CLIMATE STUDIES

Site Location: Greenfield Mill, Ayr, ON



Figure:

3d

## SITE SECTION

Site Location: Greenfield Mill, Ayr, ON

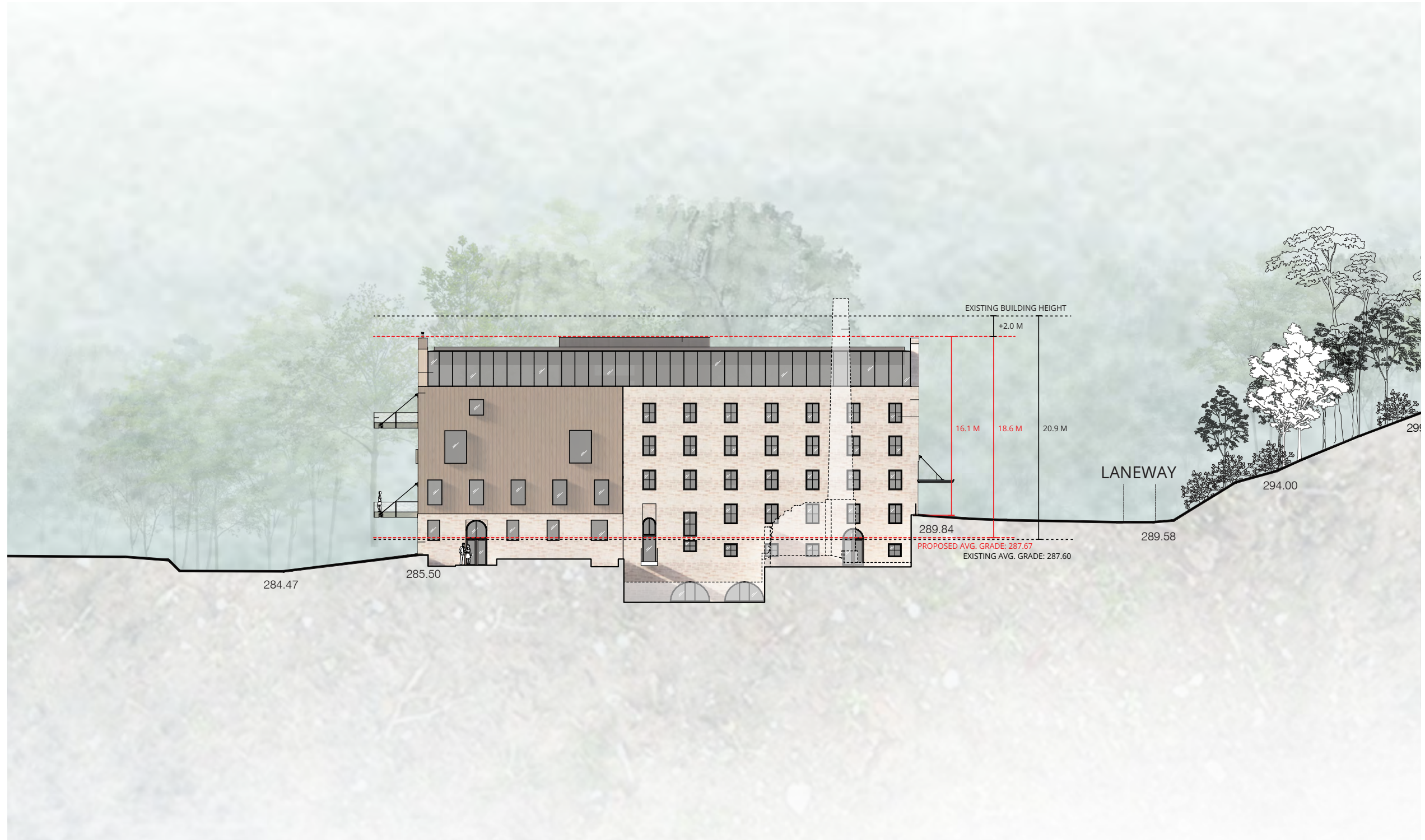


Figure:

3e

## SITE SECTION

Site Location: Greenfield Mill, Ayr, ON

LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



Figure:

3f

**NORTH ELEVATION**

Site Location: Greenfield Mill, Ayr, ON

LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



Figure:

39

**EAST ELEVATION**

Site Location: Greenfield Mill, Ayr, ON

LEGEND

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY



Figure:

3h

**SOUTH ELEVATION**

Site Location: Greenfield Mill, Ayr, ON

**LEGEND**

- ① EXISTING STONE
- ② EXISTING BRICK SMOKESTACK
- ③ VERTICAL WOOD SIDING
- ④ STANDING SEAM METAL CLADDING
- ⑤ CLEAR GLASS
- ⑥ METAL CANOPY
- ⑦ PERFORATED METAL BALCONY

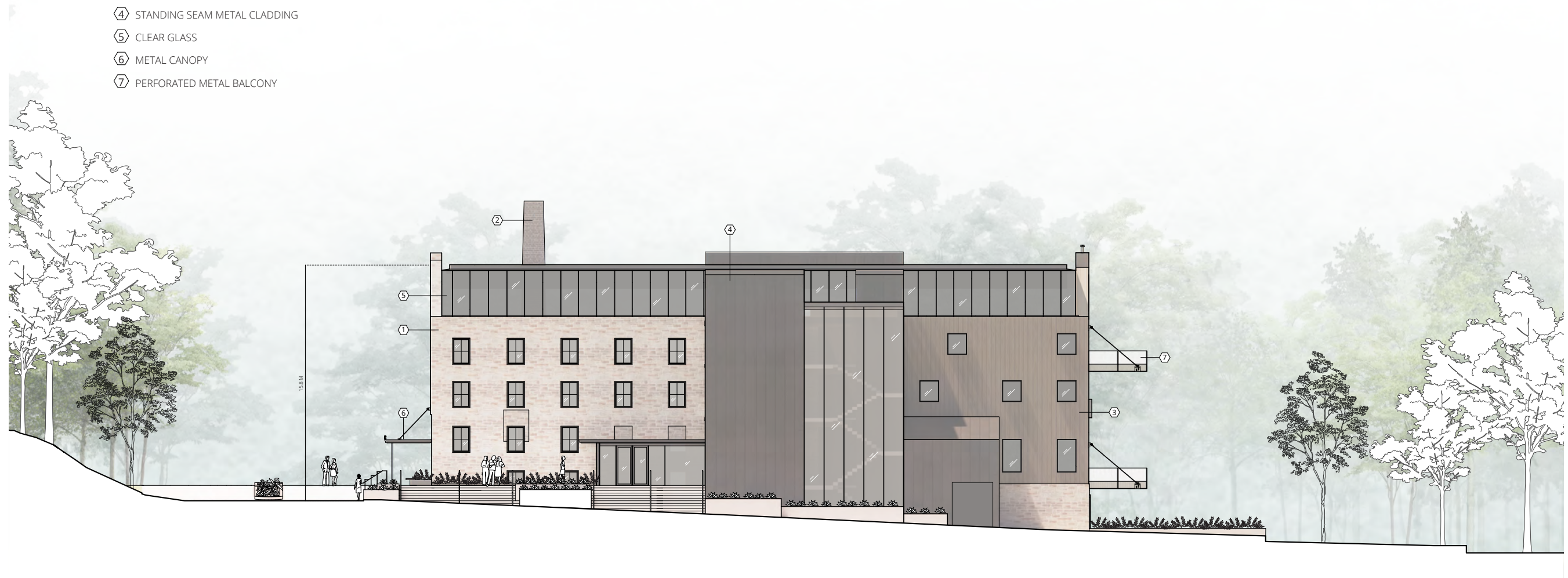


Figure:

**3i**

**WEST ELEVATION**

Site Location: Greenfield Mill, Ayr, ON



Figure:

3j

**NORTH-WEST PERSPECTIVE**

Site Location: Greenfield Mill, Ayr, ON



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Planning Group



Figure:

3k

## NORTH-EAST PERSPECTIVE

Site Location: Greenfield Mill, Ayr, ON

### 3-1 DEVELOPMENT COMPONENTS

The Proposed Redevelopment adaptively reuses the existing mill building, complemented by a new addition positioned to the rear and east of the structure, along with minor building expansions to accommodate the use and the development of parking and loading areas.

The Conceptual Site Plan demonstrates a cohesive and context-sensitive approach to the redevelopment of the Greenfield Mill property. The plan balances the preservation of the historic mill building with the introduction of new functional elements that support its adaptive reuse as an event centre and restaurant.

#### Building and Additions

The proposed building addition maintains and enhances the existing building's larger setbacks, with a front yard setback of approximately 60 metres, a minimum side yard setback of 50 metres, and a rear yard setback of 23.7 metres.

The combined total building area is 805 square metres, with a total gross floor area of 2,251 square metres. The building will accommodate an event centre, restaurant, kitchen facilities, and associated support spaces. The Conceptual Site Plan includes the following key building elements:

- Event Venue Space – 1,394 square metres;
- Restaurant – 465 square metres;
- Kitchen – 465 square metres;
- Common/Shared/Storage – 465 square metres.

The design retains the mill's industrial character while introducing modern functionality, including new entrances, canopy lines, and restored architectural features such as stone ruin walls and the existing brick chimney. The existing building height of 18.0 metres is maintained as part of the adaptive re-use.

#### Parking and Loading

The Conceptual Site Plan provides for a total of 110 surface parking spaces. The parking area is located west of the existing mill building, outside the GRCA floodplain, and is designed to minimize visual impact through landscaped islands, permeable paving, and naturalized edges.

A total of six (6) barrier-free parking spaces are provided, exceeding the AODA minimum requirement of 4 percent. These spaces are located closest to the main building entrance and are connected by accessible walkways and flush curbs.

A single loading space is located at the rear of the building, positioned to allow service vehicles to access the building without interfering with guest circulation. The loading area is screened through landscaping and grade changes to reduce its visibility from Greenfield Road and the main entrance.

### Access and Circulation

Vehicular access to the Site is provided via a new driveway from Greenfield Road. The driveway includes a ramped section with a maximum slope of 1:12. The internal circulation system is designed to accommodate vehicles, service vehicles, and emergency vehicles, with a 12-metre centreline turning radius provided along the designated fire route.

Pedestrian circulation is supported by a network of walkways connecting the parking area, building entrances, and outdoor spaces. The Site Plan identifies barrier-free flush curbs, tactile warning strips at crosswalks, and pedestrian unit paving, ensuring safe and accessible movement throughout the Site. A dedicated bike rack area is located near the main entrance to encourage active transportation.

### Landscaping and Vegetation Cover

Landscaping and vegetative cover are defining features of the Conceptual Site Plan, with extensive naturalized areas, planting beds, and restored heritage elements integrated throughout the property. The eastern and southern portions of the Site remain naturalized. These naturalized areas also serve as a visual buffer between the developed portion of the Site and the adjacent valley system.

Within the developable area, landscaped planting beds are strategically placed to soften the parking lot's edges, enhance the pedestrian environment, and reinforce the mill building's heritage character. The plan includes the restoration of stone ruin walls and the existing brick chimney, which serve as focal points within the landscape. New retaining walls are proposed to replace deteriorated structures and to support grade transitions between the parking area, building entrances, and naturalized areas. A fulsome landscape plan will be provided as part of a future Site Plan Application.

### Stormwater Management and Floodplain Considerations

The Conceptual Site Plan incorporates a stormwater management pond located adjacent to the naturalized area, designed to collect, detain, and treat runoff from the parking area and building surfaces. The pond is integrated into the landscape and contributes to the Site's ecological value.

All new development is located outside the GRCA regulatory floodline, and the Conceptual Site Plan has been designed in keeping with the Slope Stability Study, prepared by CVD Engineering.

## **3-2 PLANNING APPLICATIONS**

To permit the Proposed Redevelopment, the following planning applications are required:

1. Township of North Dumfries Official Plan Amendment
2. Zoning By-law Amendment

### 3-2-1 Township of North Dumfries Official Plan Amendment

The Owner is requesting that the developable portion of the Site and the municipal road allowance be redesignated as "Settlement Core Area" on Map 2.8 and those developable areas removed as being designated as "Core Environmental Features and Significant Valleys" (Map 5A), "Environmental Constraints Areas" (Map 5B)", "Hazard Lands" (Map 5C) and "Prime Agricultural Area" (Map 7)(Figure 4).

### 3-2-2 Township of North Dumfries Official Plan Amendment

The Owner is requesting that the developable portion of the Site and the municipal road allowance be rezoned from "Z.3" and "Z.1" to a site-specific "Zone 7 (Z.7) – Holding Provision" and the removal of site-specific regulation 20.1.150 (Figure 5):

"20.1. \_\_\_\_\_

#### Permitted Uses

- Assembly or Banquet Hall, defined as "a service commercial establishment used for the purposes of catering to banquets, weddings, receptions or similar functions (e.g. political, civic, religious, social, educational, recreational) for which food and beverages are prepared and served on the premises, and which may include a catering service.
- Indoor and outdoor uses, accessory to permitted use(s).

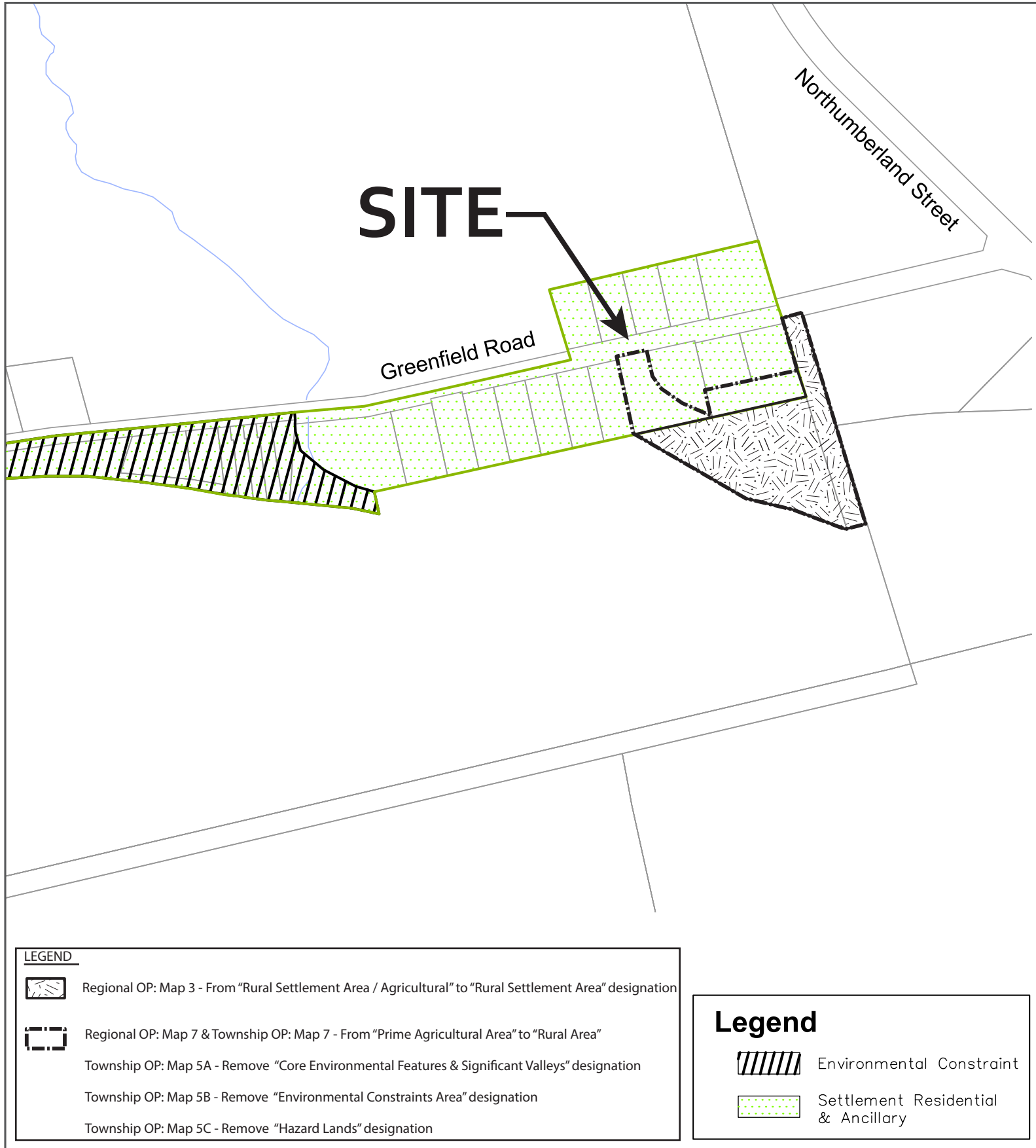
#### General Use Regulations

Notwithstanding the Provisions of Section 13.3, the following provisions shall apply:

- No buildings shall be erected in a Zone 7 - Z.7 within 15 metres of the limit of any Zone 2, 2a, 3, 4, 4a or 5
- Minimum front and side yard setbacks to a property line of 15 metres
- Minimum lot frontage: 20 metres
- Maximum Building Height: 20 metres
- Minimum Off-Street Parking: a minimum of one (1) off-street parking space per 22 square metres of gross floor area
- Off-street parking shall be permitted in any yard, provided a 1.5 metre landscape buffer is provided

#### Holding Provision (H)

- No development of the lands shall be permitted until such time as the following is provided to the Township of North Dumfries to the satisfaction of Township staff and the removal of the Holding Provision:
  - Ministry of the Environment, Conservation and Parks Record of Site Condition
  - Ministry of Citizenship and Multiculturalism Enter into the Registrar Archaeological Assessment





**SITE**

Northumberland Street

Greenfield Road

**LEGEND**

-  Regional OP: Map 3 - From "Rural Settlement Area / Agricultural" to "Rural Settlement Area" designation
-  Regional OP: Map 7 & Township OP: Map 7 - From "Prime Agricultural Area" to "Rural Area"  
 Township OP: Map 5A - Remove "Core Environmental Features & Significant Valleys" designation  
 Township OP: Map 5B - Remove "Environmental Constraints Area" designation  
 Township OP: Map 5C - Remove "Hazard Lands" designation

**Legend**

-  Environmental Constraint
-  Settlement Residential & Ancillary

Figure:

**4**

**TOWNSHIP OFFICIAL PLAN  
AMENDMENT**

Site Location: Greenfield Mill, Ayr, ON



**BAKER**  
Planning Group

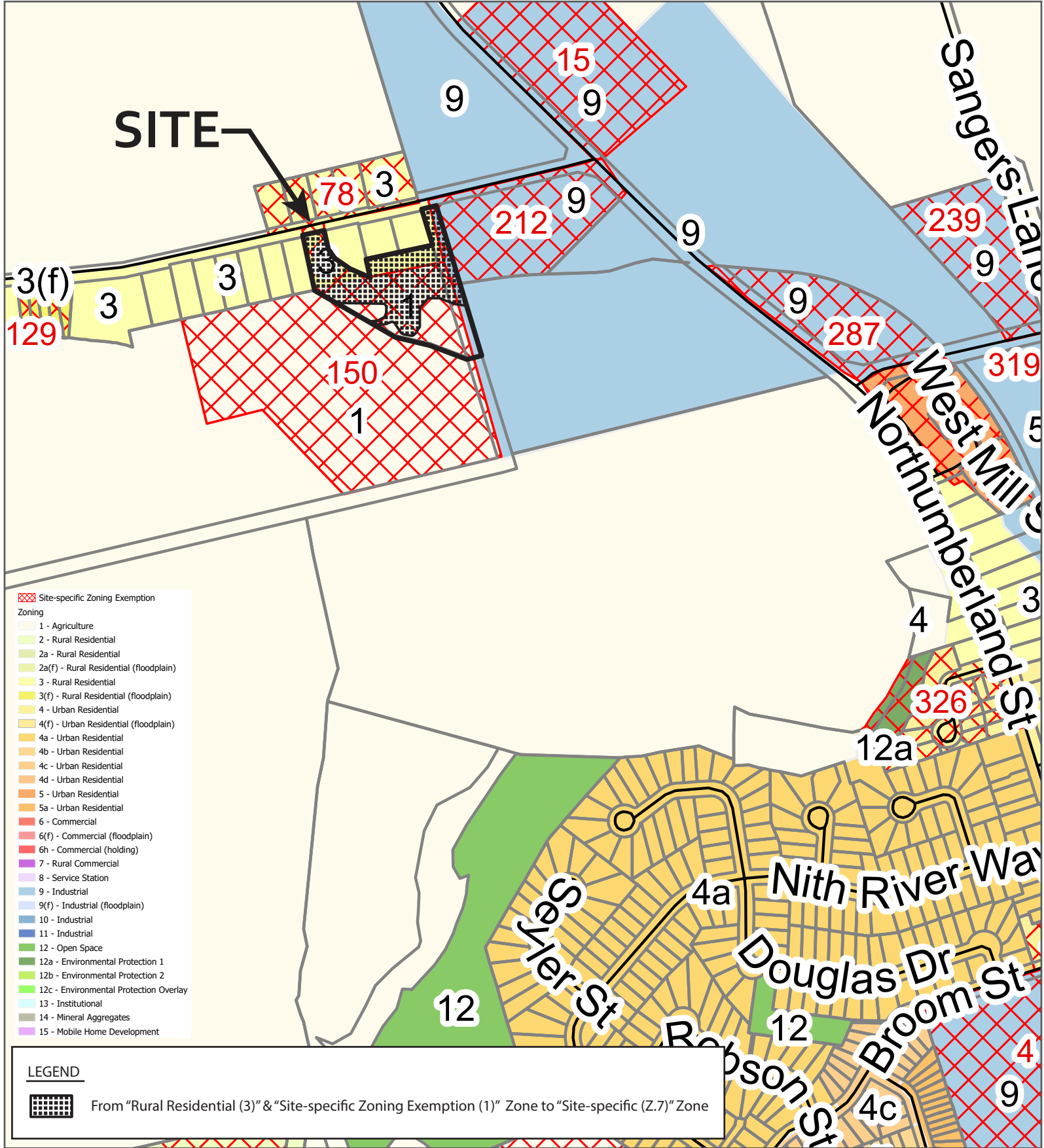


Figure:

5

# TOWNSHIP ZONING BY-LAW AMENDMENT

Site Location: Greenfield Mill, Ayr, ON



**BAKER**  
Planning Group

### 3-3 FORMAL CONSULTATION

The Owner completed the Formal Consultation process with the Township of North Dumfries, along with the Region of Waterloo and the Grand River Conservation Authority, and the following submission requirements were identified for the Applications (meeting minutes dated October 2, 2024, Township File No.: PC-18/24):

- Complete Official Plan and Zoning By-law Amendment Application Forms
- Planning Justification Report
- Site Plan Drawing with Building Code Matrix
- Building Elevations
- Environmental Impact Study
- Stormwater Management Report
- Functional Servicing Report
- Hydrogeological Study
- Geotechnical/Slope Stability Study
- Stationary Noise Study
- Archaeological Assessment and Ministry Acknowledgement Letter (\*to be submitted prior to Site Plan Approval)
- Record of Site Condition and Ministry Acknowledgement Letter (\*to be submitted prior to Site Plan Approval)
- Parking Utilization Study
- Traffic Impact Study
- Cultural Heritage Impact Assessment

### 3-4 PUBLIC CONSULTATION

In advance of filing the formal Applications, the Owner developed a Public Consultation Plan to introduce the Proposed Redevelopment to the community and receive feedback and input. The Consultation Plan includes a neighbourhood open house to be held on the site to provide details regarding the development.

### 3-5 FUTURE PLANNING APPLICATIONS

Subsequent to the Official Plan and Zoning By-law Amendment Applications, the Owner will be required to obtain Site Plan Approval and lift the Holding Provision.

## 4 TECHNICAL STUDIES

### 4-1 FUNCTIONAL SERVICING REPORT AND STORMWATER MANAGEMENT

GEI was retained by the Owner to prepare the Functional Servicing Report and Stormwater Management Report. The report concluded that:

- Site access for the Proposed Redevelopment will be provided via Greenfield Road, and the grading of the development is controlled by these access routes.
- Water supply for the Proposed Redevelopment will be provided via extension of a 200 mm diameter water main from the existing water main at the southern intersection of Greenfield Road and Northumberland Road to the property.
- Sanitary service for the Proposed Redevelopment will be provided via extension of a 200mm diameter sanitary sewer pipe from the existing sanitary sewer at the southern intersection of Greenfield Road and Northumberland Road to the property. Two options are suggested to provide sanitary servicing for the property, and both require a private sanitary pumping station and sanitary sewer forcemain.
- Storm service for the Proposed Redevelopment will be provided via proposed storm sewers that discharging to the proposed SWM facility and ultimately to the downstream receiving tributary.
- The post-development condition peak flow rates have been attenuated to less than the allowable release rates for the 2 through 100-year design storm events with proposed SWM facilities.
- Quality control is provided by the proposed SWM facility, achieving Enhanced level protection (80% TSS treatment) and controlling TP loads to less than pre-development TP levels.
- A 5mm retention is not provided on site due to high groundwater levels.
- GRCA criteria for a parking lot and SWM facility within the One-Zone floodplain policy area have been met.
- Prior to construction, a silt fence will be installed along the property boundary in all locations where runoff will discharge from the site to adjacent lands. This will minimize the transport of sediment off-site during the construction period.

### 4-2 TRAFFIC IMPACT BRIEF AND PARKING JUSTIFICATION STUDY

TraffMobility prepared the Traffic Impact Brief and Parking Justification Study, and concluded as follows:

#### Existing Conditions

- The analysis results indicate that all movements at study intersections are operating with acceptable level of service and residual capacity during the weekday AM, weekday PM, and Saturday peak hours under existing conditions.
- The analysis results indicate that queues can be accommodated within the available storage during all peak hours under existing conditions.

### Future Background Conditions

- The analysis results indicate that all movements at study intersections are operating with an acceptable level of service and residual capacity during the weekday AM, weekday PM, and Saturday peak hours under future (2031) background conditions.
- The analysis results indicate that queues can be accommodated within the available storage during all peak hours under future (2031) background conditions.

### Traffic Trip Generation

- The Site is expected to generate 65 new vehicle trips during the weekday AM peak hour, 166 new vehicle trips during the weekday PM peak hour, and 200 new vehicle trips during the Saturday peak hour.

### Future Total Conditions

- The analysis results indicate that all movements at study intersections are operating with acceptable level of service and residual capacity during the weekday AM, weekday PM, and Saturday peak hours under future (2031) total conditions.
  - While the eastbound shared left-right turn movement at the Northumberland Street and Greenfield Road intersection is projected to operate at LOS F during the weekday PM peak hour, the average control delay of 54 seconds remains below the threshold of 55 seconds.
- The analysis results indicate that queues can be accommodated within the available storage during all peak hours under future (2031) total conditions.
- No mitigation measures are required to support the Proposed Redevelopment.

### Site Circulation and Geometric Review

- Based on the swept path analysis, it is observed that the garbage truck, the pumper fire truck, and the passenger vehicles can be accommodated at the site access and internally through the Site.
  - It is noted that refinements to the hammerhead turning area at the corner parking spaces are required to accommodate vehicle manoeuvring, which will be addressed through the site plan approval process
- The existing alignment of the Northumberland Street and Greenfield Road intersection meets the minimum sight distance requirements for the shared eastbound left-right-turn movement.
  - It is noted that the intersection skew angle of 56.5° falls outside the desirable range of 80° to 100° identified in TAC Section 9.7.2. While the sightline review confirms that adequate sight distances are available, it is recommended that proper care be taken to ensure that no obstructions (i.e., trees etc.) are placed within the sight triangles of the intersection.
- A northbound left-turn lane is warranted at the Northumberland Street and Greenfield Road intersection during all study peak hours and horizon years, including under existing (2026) conditions. A storage length of 25 m, 30 m, and 40 m is warranted under existing (2026), future (2031) background, and future (2031) total conditions, respectively.

- Eastbound and southbound right-turn lanes are not recommended at the Northumberland Street and Greenfield Road intersection under future (2031) total conditions based on the results of operational analysis.
  - Although the eastbound shared left-right turn movement is projected to operate at LOS F during the weekday PM peak hour, the average control delay remains below the 55- second threshold and the 95th percentile queue is expected to be contained within the available storage length. The delay experienced by the eastbound movement is governed by the left turn movement waiting for an acceptable gap in traffic on the stop-controlled approach, rather than the right turn volume.

#### Parking Supply

- The proposed parking supply for the development is below the Township's Zoning by-law requirement. The findings from a detailed parking justification study supplemented with a site-specific transportation demand management (TDM) plan show that the Site's expected parking demand can be accommodated by the proposed parking supply.
- The deficiencies in the dimensions of accessible parking and loading spaces will be addressed during the site plan approval stage.

### **4-3 URBAN DESIGN BRIEF**

The Owners retained The Biglieri Group to prepare an Urban Design Brief. The Brief concluded that the Proposed Redevelopment conforms with the policies and guidelines of the Region of Waterloo Official Plan, the Township of North Dumfries Official Plan and Zoning By-law, the Township of North Dumfries Urban Design Guide, and the Greenfield Heritage Conservation District Plan and Guidelines. High-level urban design and architectural strategies will be incorporated to ensure an appropriate balance between preservation and new architectural elements, resulting in a sustainable future for the Greenfield Mills. This proposal represents an outstanding example of an adaptive reuse of a previously underutilized building, ensuring this building experiences new life for the Ayr community to enjoy.

### **4-4 SCOPED CULTURAL HERITAGE IMPACT ASSESSMENT**

The Biglieri Group Ltd. was retained by Greenfield Mill Co. to prepare a Scoped CHIA Site. The Site is located within the Greenfield Heritage Conservation District and therefore is designated under Part V of the Ontario Heritage Act as a Protected Heritage Property.

This Scoped CHIA assessed the Proposed Redevelopment in the context of the Greenfield Village Heritage Conservation District (GHCD), the site's identified cultural heritage values and attributes, and the guiding principles set out in the Standards and Guidelines for the Conservation of Historic Places in Canada.

Overall, the Proposed Redevelopment is largely consistent with the objectives, policies, and guidelines of the GHCD Plan. The proposal strengthens the long-term conservation prospects of the property through adaptive reuse, reintegration into active use, and investment in stabilization and restoration of the surviving historic stone mill structure. The introduction of a viable commercial use,

particularly one that supports public access and awareness, is recognized as a beneficial outcome that addresses the risks associated with prolonged vacancy, deferred maintenance, and continued deterioration of the site.

The impact assessment undertaken in the report identifies a range of effects associated with the Proposed Redevelopment. These include a moderate impact related to destruction resulting from the removal of later brick storeys and the four-storey stacked plank grain house, which represents a rare 1860s construction method and contributes to the historic massing of the mill complex. Minor impacts related to alteration are identified as a result of stabilization works, integration of new additions, replacement of windows and doors, and the introduction of new access features necessary to support the proposed adaptive reuse.

Negligible impacts related to isolation due to the introduction of surface parking and beneficial impacts associated with the change in land use underscore the importance of adaptive reuse in ensuring the site's long-term viability. Potential impacts associated with land disturbances, including archaeological resources and tree removal, are recognized but can be appropriately addressed through future assessment and site plan controls. Importantly, the proposal does not introduce adverse impacts related to shadows or obstruction of significant views as identified in the GHCD Plan.

Where the proposal diverges from GHCD policies and guidelines, including the removal of trees, loss of original window and door frames, introduction of a new driveway and parking areas, removal of the grain house and brick addition, and questions regarding the reversibility of the new addition, have been carefully considered and balanced against the functional requirements of adaptive reuse, the physical condition of the buildings, and the broader conservation objectives of the site. In particular, the removal of the grain house and later additions, while recognized as adverse from a heritage standpoint, is supported by technical evidence demonstrating poor structural condition and limited feasibility for continued retention without compromising authenticity or functional viability.

In response to these identified impacts, a comprehensive review of alternative development options was undertaken. The analysis demonstrates that a "do nothing" preservation approach is not appropriate given the site's prolonged vacancy, incompatible zoning, and the high risk of continued deterioration. A full restoration to the original 1850s mill form was also found to be impractical, as it would necessitate the removal of later contributing elements, rely in part on conjectural reconstruction, and fail to accommodate the contemporary interventions required for adaptive reuse. Rehabilitation of the entire existing mill complex, while conceptually aligned with heritage best practices, is only partially recommended due to significant challenges related to structural condition, accessibility, noise mitigation, functional programming, and compatibility with the low-rise residential character of the Greenfield community.

As a result, the assessment supports the conclusion that the current proposal's hybrid approach to conservation, combining selective restoration of the original stone mill, rehabilitation of retained elements, and sensitive contemporary additions, is the most balanced and pragmatic option available for the building's continued use. The mitigation and conservation recommendations outlined in the assessment provide a robust framework to further reduce adverse impacts and

enhance heritage outcomes. These measures, including comprehensive documentation and salvage prior to demolition, interpretation and commemoration of lost elements, sensitive landscape design, tree preservation strategies, reversibility of new interventions, and the preparation of a Scoped Conservation Plan, ensure that heritage values are respected, understood, and sustained over time.

Implementation and monitoring measures further reinforce accountability and ongoing stewardship through coordinated roles for heritage consultants, designers, engineers, and City staff.

The assessment concluded that while the Proposed Redevelopment will result in the loss of certain historic building components and landscape elements, these impacts are justified within the broader context of adaptive reuse, structural realities, and long-term conservation goals. With the application of the recommended mitigation and conservation measures, the proposal represents a defensible and appropriate balance between heritage conservation, functional reuse, and community compatibility, securing a sustainable future for the

Greenfield Mill as a valued cultural heritage resource within the Greenfield Village Heritage Conservation District.

Lastly, the assessment concluded that allowing the property's inclusion in the Greenfield settlement area, to which it has historically contributed over the past 170 years, and permitting extended uses support the long-term conservation of this significant cultural heritage resource and the overall Greenfield Heritage Conservation District.

#### **4-5 NOISE STUDY**

Arcadis Professional Services (Canada) Inc. was retained by the Owner to prepare a Noise Study to evaluate the potential impacts of the Proposed Redevelopment on the surrounding residential lands. The sound power level of the following equipment must be met at the locations described in the Study:

- All rooftop mechanical equipment combined must meet an overall sound power level of 93 dBA
- Emergency Generator must meet an overall sound power level of 102 dBA (equivalent to 77 dBA at 7 meters)

These requirements are expected to be feasible given the type and size of the proposed development and associated equipment. An acoustical consultant should review the manufacturer's data for the selected equipment to ensure it meets the criteria and that compliance will be achieved.

#### **4-6 PRELIMINARY GEOTECHNICAL AND SLOPE STABILITY INVESTIGATION**

CVD was retained by the Owner to conduct a preliminary geotechnical and slope-stability investigation for the Proposed Redevelopment. A "Scoped" Hydrogeological Assessment was completed by CVD, which should be read in conjunction with this report.

Based on the CVD field investigation, the boreholes are underlain by either 150 to 300 mm of topsoil or 150 to 380 mm of granular base, depending upon the location. Fill materials, typically comprised of sand and silt to sandy silt and containing occasional asphalt, wood, and brick fragments, were encountered in all nine (9) boreholes, and extended to depths varying between 0.80 and 3.65 m below grade.

Native fine granular deposits, varying between fine to medium sand and silt, underlie the fill layer. Occasional clay and/or silt lenses/seams were encountered in the deposits. These subsoils extend to depths between 1.40 and 2.90 m, corresponding to elevations between 286.91 and 287.37 m. Additionally, a sand and gravel to sand deposit was encountered beneath the fill materials in Borehole 5 and extended to at least elevation 283.06 m. The aforementioned deposits are underlain by a sandy silt till with occasional clayey lenses/seams. This deposit extends to at least the termination depths of 5.05 and 6.55 m in Boreholes 1 to 4, corresponding to elevations between 281.86 and 284.76 m.

Based on the manually recorded data, groundwater levels across the Site varied between 283.82 and 288.79 m (approximately 0.5± to 3± m below existing grade). The overall groundwater flow direction is towards the south of the property in the direction of the Nith River and generally follows the topography of the Site. It should be noted that the observed groundwater table will fluctuate seasonally and in response to major weather events.

The report includes an assessment of the slope and the methods to provide for a stable slope, including the potential for a retaining wall.

#### **4-7 ENVIRONMENTAL IMPACT STUDY**

Arcadis was retained by the Owner to prepare a Scoped Environmental Impact Study (EIS) for the Proposed Redevelopment. The Site contains some treed areas, but most of it is anthropogenically influenced. The majority of the site is occupied by the former parking area, and the former mill structure itself. Some areas of steep slope and the majority of the site are regulated by the Grand River Conservation Authority due to the steep slopes and flooding hazards present on site. The Proposed Redevelopment would result in the loss of some treed areas, which could be offset through the planting of new trees and landscaping with native vegetation on site. Ongoing use and maintenance of the mill will ensure the chimney remains in good condition and available for Chimney Swifts to utilize.

Key recommendations include:

- Any vegetation removal should avoid the breeding bird season: April 1 to August 31, inclusive, to reduce the potential for incidental take of active bird nests.
- In the case that wildlife is observed within the work area, all work in the area shall stop until the animal has left the area on its own. If wildlife relocation is required, consultation with MNR is necessary to obtain the necessary permits and approvals under the FWCA.

- Due to the presence of day roosting habitat and the potential presence of foliage-roosting bat Species at Risk, registration with MECP will be required, and any tree removals should avoid the active bat season: March 15 to November 30, inclusive.
- Due to the Site's location within the GRCA Regulated Area (associated with floodplain and slope hazards), consultation with and a permit/authorization from GRCA will be required for redevelopment activities.
- Tree removals within the Significant Woodland require a permit in accordance with the Region of Waterloo's Woodland Conservation Bylaw o8-026 (Region of Waterloo 2008).

## 5 PLANNING POLICY FRAMEWORK

This section of the Planning Justification Report provides an overview of the planning policies relevant to the Proposed Development and the Zoning By-law Amendment Application.

### 5-1 PLANNING ACT, R.S.O. 1990, CHAPTER P.13

The *Planning Act, R.S.O. 1990, CHAPTER P.13*, provides provincial legislation that “sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled and who may control them.”

Section 2 of the Planning Act outlines the matters of provincial interest that the council of a municipality, a planning board and the Ontario Land Tribunal shall have regard to in carrying out their responsibilities under the Act. The following table provides a summary of the provincial interests and an analysis of the Proposed Development and the Application.

**Table 5-1: Summary of Provincial Interest**

Section	Provincial Interest	Analysis
a)	the protection of ecological systems, including natural areas, features and functions	The Owner has completed an EIS that demonstrates no negative impacts to the natural features and functions on the Site, including the provision of compensation planting areas.
b)	the protection of the agricultural resources of the Province	While the Site is located within the agricultural system, the Site does not contain any agricultural resources and will not affect the nearby agricultural field’s function. It forms part of the historical urban development in the Greenfield settlement area.
c)	the conservation and management of natural resources and the mineral resource base	The Site does not contain any known natural resources or mineral resources.
d)	the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest	The Owner has retained TMHC to prepare the Stage 1 and 2 Archaeological Assessment in consultation with First Nations.
e)	the supply, efficient use and conservation of energy and water	The adaptive re-use of existing built infrastructure contributes to minimizing energy and water needs. Through the detailed building design, consideration will be given to further energy and water reduction opportunities.
f)	the adequate provision and efficient use of communication,	<ul style="list-style-type: none"> <li>• Communication services are available to the Site.</li> </ul>

Section	Provincial Interest	Analysis
	transportation, sewage and water services and waste management systems	<ul style="list-style-type: none"> <li>Water services are available and sanitary services will be extended, as outlined in the FSR.</li> <li>Waste management has been considered through the Conceptual Site Plan, including internal waste storage and waste removal.</li> </ul>
g)	the minimization of waste	The re-use of the existing buildings on the Site will reduce overall waste on the Site, and further reduce the amount of new materials required for construction.
h)	the orderly development of safe and healthy communities	<p>A portion of the Site is located within the defined settlement area, and a small expansion to the Greenfield settlement area is proposed to recognize the historical urban land use on the property.</p> <p>The supporting technical studies address matters such as traffic impacts, noise impacts, land use compatibility, stormwater management and servicing.</p> <p>The Urban Design Brief sets out the sensitive integration of the Proposed Redevelopment into the existing area context.</p>
h.1)	the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies	Sufficient accessible parking and accessible units are provided. Through future applications, including the Ontario Building Code, matters related to accessibility will be further addressed.
i)	the adequate provision and distribution of educational, health, social, cultural and recreational facilities	The Proposed Redevelopment will provide for social facilities to the community.
j)	the adequate provision of a full range of housing, including affordable housing	N/A
k)	the adequate provision of employment opportunities	The proposed use will provide for permanent jobs (staff).
l)	the protection of the financial and economic well-being of the Province and its municipalities	The efficient use of land with existing and planned municipal infrastructure, provides for long-term financial stability and cost-effective development.
m)	the co-ordination of planning activities of public bodies	To be addressed through the circulation of the planning applications to applicable public bodies.

Section	Provincial Interest	Analysis
n)	the resolution of planning conflicts involving public and private interests	Planning conflicts involving public and private interests have not been identified through the pre-consultation review.
o)	the protection of public health and safety	The proposed use will be fully serviced on municipal water and sanitary.
p)	the appropriate location of growth and development	In our professional opinion, the Site is an existing developed property with the ability to be adaptively re-used for the proposed event space.
q)	the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians	Transit services are not available in this location.
r)	the promotion of built form that:	
r.i)	is well-designed	The redevelopment contributes to the heritage character of Greenfield by preserving the existing mill building, in a context-sensitive manner that meets heritage conservation requirements and urban design principles.
r.ii)	encourages a sense of place	
r.iii)	provides for public spaces that are of high quality, safe, accessible, attractive and vibrant	N/A
s)	the mitigation of greenhouse gas emissions and adaptation to a changing climate	The Proposed Redevelopment of urban land minimizes the consumption of agricultural land.

In summary, it is our opinion that the Proposed Redevelopment and the implementing Official Plan and Zoning By-law Amendment Applications have regard for matters of public interest.

## 5-2 PROVINCIAL POLICY STATEMENT, 2024

The Provincial Planning Statement (“PPS”), 2024 is a province-wide policy document that sets the foundation for regulating development and land use. The PPS is issued under Section 3 of the *Planning Act*. The PPS “sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians.” The document is to be read in its entirety, and all relevant policies must be considered. Municipal official plans are the most important vehicle for implementing the PPS and achieving comprehensive, integrated, and long-term planning.

The following section summarizes the policy directives relevant to the Proposed Development and the associated Applications.

### Creation of Healthy and Livable Communities

The PPS, in Section 2.1.6, states that planning authorities should support the achievement of complete communities by:

- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
- b) *improving accessibility for people of all ages and abilities by addressing land use barriers 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 Redevelopment contributes to the range and mix of land uses within the settlement areas of Ayr and Greenfield, supporting an event space that meets the community's gathering needs while building upon the area's heritage.

### Directive #2 – Settlement Boundary Expansions

Settlement areas shall be the focus of growth and development with efficient land use patterns that support a mix of land uses. Section 2.3.3 of the PPS supports general intensification and redevelopment, including planning for a range and mix of housing options.

Section 2.1.4 provides that sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance.

The PPS provides policies with respect to the expansion of settlement areas in Section 2.3.2. A planning authority shall consider the following for a proposed settlement area boundary expansion:

- a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;
- b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;
- c) whether the applicable lands comprise specialty crop areas;
- d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;
- e) whether the new or expanded settlement area complies with the minimum distance separation formulae;
- f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and
- g) the new or expanded settlement area provides for the phased progression of urban development.

Section 4.3.4.1 of the PPS states that planning authorities may only exclude land from prime agricultural areas for expansions of or identification of settlement areas in accordance with policy 2.3.2.

In our professional opinion, the Proposed Redevelopment and the requested expansion to the settlement area are consistent with the PPS. As noted, there is a limited land area between the settlement area of Ayr and the settlement area of Greenfield. The intervening land area comprises three (3) lots and an approximate distance of 375 metres. These intervening lands are limited to natural areas along the Nith River and the former Mill building on the Site. Historical land use, existing grades, and flooding have limited the use of the intervening land for agricultural purposes.

The minor expansion to the Greenfield settlement area recognizes that the Site has not and would not be utilized for agricultural purposes and has historically contained a non-agricultural use. The Site forms part of the built-heritage of Greenfield and was an active urban land use within the community for decades.

Further to the policies in Section 2.3.3, it is our professional opinion that the North Dumfries Official Plan, adopted in 2018, is based on a planning horizon to 2038. The PPS, 2024, extends the planning horizon for land-use needs up to 30 years, requiring municipalities to plan to 2056. This shift materially alters the Township's long-term land budget and necessitates reconsideration of settlement area boundaries to ensure sufficient land is available to accommodate growth, redevelopment, and community-serving uses over the extended horizon.

Within this context, the proposed expansion—limited to approximately XX hectares—constitutes a minor, strategic adjustment to the existing settlement area. Its scale is modest relative to the Township's overall land base, and its purpose is narrowly tailored to accommodate a specific redevelopment opportunity on a previously developed property. The combination of a significantly longer planning horizon and the small, contained nature of the expansion demonstrates that adding this land to the settlement area is both appropriate and consistent with the PPS 2024's direction to plan proactively for long-term needs.

Supporting technical studies confirm that the site can be fully serviced by municipal water and sanitary systems, with adequate capacity available to accommodate the Proposed Redevelopment. This satisfies the PPS 2024 requirement that expansions occur only where servicing is feasible and cost-effective, and it reinforces the Township's objective of directing growth to areas where infrastructure already exists or can be efficiently extended.

The PPS requires that settlement boundary expansions avoid specialty crop areas and minimize impacts on the broader agricultural system. The Site does not contain specialty crop soils, nor do they form part of an active agricultural operation. The Site is physically and functionally separated from surrounding agricultural lands by existing urban development and is accessed through the settlement area, ensuring no fragmentation of agricultural operations or disruption to the agricultural land base.

Furthermore, the proposed redevelopment does not introduce new land-use conflicts. A review of the Minimum Distance Separation (MDS) Guidelines confirms that the project will not generate negative impacts on nearby livestock operations, nor will it constrain their ongoing viability.

The PPS permits settlement boundary expansions where the proposed use cannot be reasonably accommodated within the existing settlement area. In this case, the redevelopment is inherently tied to the presence of an existing building—a historic mill—located just outside the current settlement area. The adaptive re-use of this structure cannot be relocated elsewhere in the Township, as the opportunity is site-specific and dependent on the physical, cultural, and contextual attributes of the property.

No alternative locations exist within the settlement area that could accommodate the proposed use while achieving the same heritage conservation, community benefit, and land-use efficiency outcomes. This satisfies the PPS requirement to demonstrate that expansions are justified by need and lack of alternatives.

The proposed expansion represents a logical rounding out of the settlement area. It connects two existing settlement areas, creating a more coherent and contiguous urban structure. The location and configuration of the expansion provide meaningful opportunities for redevelopment while avoiding leapfrogging, scattered development, or inefficient land consumption.

### Directive #3 – Rural Areas

The PPS provides specific policies for land located within rural areas, including rural settlement areas such as Greenfield. Section 2.5.1 states that healthy, integrated and viable rural areas should be supported by:

- a) building upon rural character, and leveraging rural amenities and assets;
- b) promoting regeneration, including the redevelopment of brownfield sites;
- 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;
- f) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;
- g) conserving biodiversity and considering the ecological benefits provided by nature; and
- h) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.

Rural settlement areas are intended to be the focus of growth in rural areas, and their vitality and regeneration shall be promoted. The scale of development will be appropriate to the rural characteristics and service levels.

Section 2.6 permits a range of land uses, including rural land uses that can be sustained by rural service levels. Development shall be appropriate to the planned or available infrastructure and avoid the need for uneconomical expansion of this infrastructure.

New land uses shall comply with the minimum distance separation formulae. The Minimum Distance Separation (MDS) Document is a land-use planning tool developed by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) to prevent land-use conflicts and minimize odour-related nuisance complaints. The MDS Document consists of guidelines that establish setbacks between sensitive land uses and livestock facilities.

As the Site is located adjacent to an agricultural area and the Official Plan Amendment seeks to expand the settlement area, the PPS requires an evaluation of MDS.

Guideline #2, states that minimum separation distances between new sensitive land uses and existing surrounding livestock facilities shall comply with the MDS 1 guidelines. Per Guideline #34, a settlement boundary expansion is a Type B Land Use (More Sensitive) as they are characterized by a higher density of human occupancy, habitation and activity.

Implementation Guideline #6 provides direction on conducting MDS I calculations. It states that as part of municipal consideration of planning or building permit applications, existing livestock facilities or anaerobic digesters within a 750 metres distance of Type A applications and within a 1,500 metres distance of Type B applications shall be investigated

Guideline #12 provides that a reduced MDS I setback may be permitted, provided there are four or more non-agricultural uses, residential uses and/or dwellings closer to the subject livestock facility than the proposed development or dwellings and those four or more non-agricultural uses, residential uses and/or dwellings.

There is one potential existing livestock facility within 1,500 metres of the Site (2856-2952 Greenfield Road); however, there are four (4) or more intervening existing sensitive land uses. As such, no further MDS investigations are required to address the PPS policies.

#### Directive #4 – Natural Heritage and Hazard Lands

Policies related to the protection of natural heritage features and hazard lands are provided in Section 4.1 of the PPS.

Section 4.1.5 states that development and site alteration shall not be permitted in significant woodlands, significant valleylands and significant wildlife habitat unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Policies related to hazard lands are provided in Section 5.2, stating that development and site alteration shall not be permitted within areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it

has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard.

#### Direction #5 – Cultural Heritage and Archaeology

Section 4.6 of the PPS provides specific policy direction on cultural heritage and archaeology. Specifically, Policy 4.6.1 states that significant built heritage resources and significant cultural heritage landscapes shall be conserved.

Further, Section 4.6.2 states that planning authorities shall not permit development or site alteration on land containing archaeological potential unless the significant archaeological resources have been conserved.

#### Directive #6 – Infrastructure

Policies related to the provision of infrastructure are provided in Section 3.1 of the PPS, stating that infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.

Section 3.6.2 states that municipal sewage services and municipal water services are the preferred means of servicing settlement areas to support environmental protection and minimize potential risks to human health and safety.

Section 3.5.8. provides that stormwater management shall be integrated with planning for sewage and water services and designed to prevent or reduce increases in stormwater volumes and contaminant loads.

### **Planning Analysis**

It is our professional opinion that the Proposed Redevelopment and the implementing Applications are consistent with the PPS. As outlined in the preamble to the PPS, the policy-led planning systems in Ontario seek to address the complex interrelationships among the pillars that contribute to sound land-use planning. This includes agricultural protection, the creation of complete communities, protection of natural features and hazards, long-term economic prosperity, and climate change mitigation.

### **5-3 REGION OF WATERLOO OFFICIAL PLAN, 2015**

The Region of Waterloo Official Plan, 2015 (“ROP”), provides the framework for growth and development through 2051. It seeks to implement Regional Council’s long-term vision for an inclusive, thriving, and sustainable community. The policies of the ROP are now implemented by the Township of North Dumfries.

The policies of the ROP are based on its founding vision: “Waterloo Region will be an inclusive, thriving, and sustainable region of connected urban and rural communities with global reach,

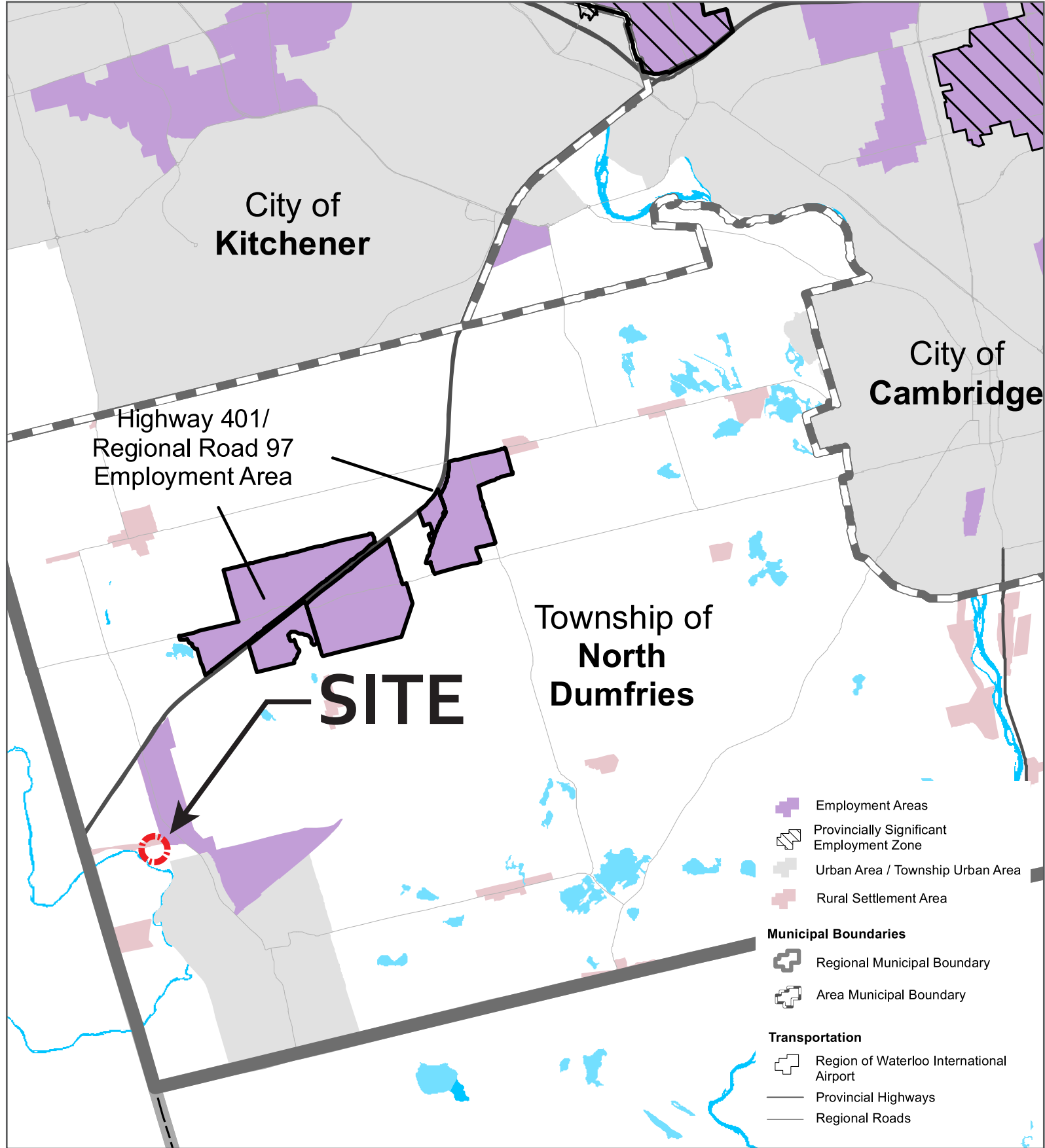


Figure:

6

**REGIONAL OFFICIAL PLAN, 2015**  
**MAP 3: EMPLOYMENT AREAS**

Site Location: Greenfield Mill, Ayr, ON



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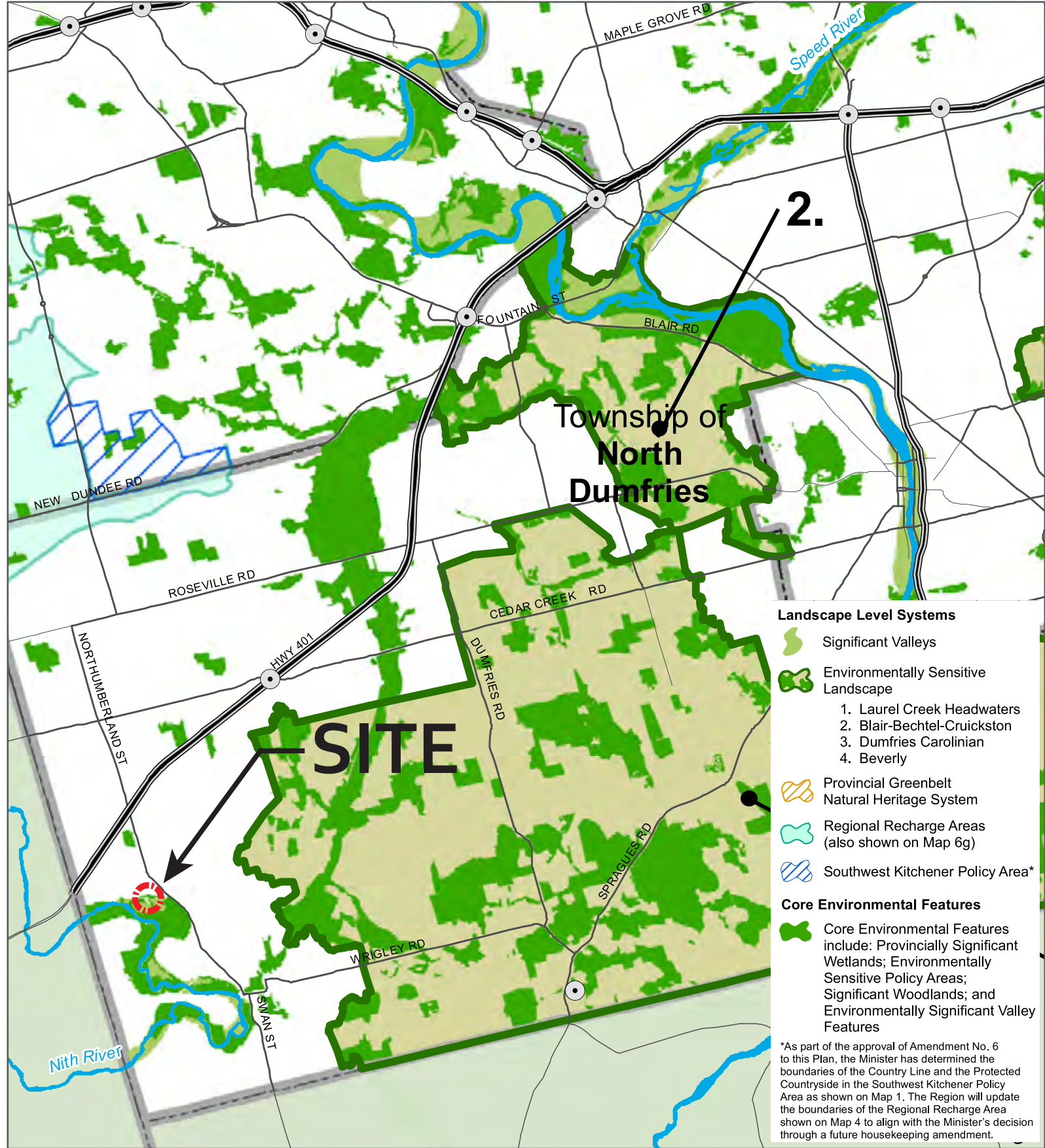


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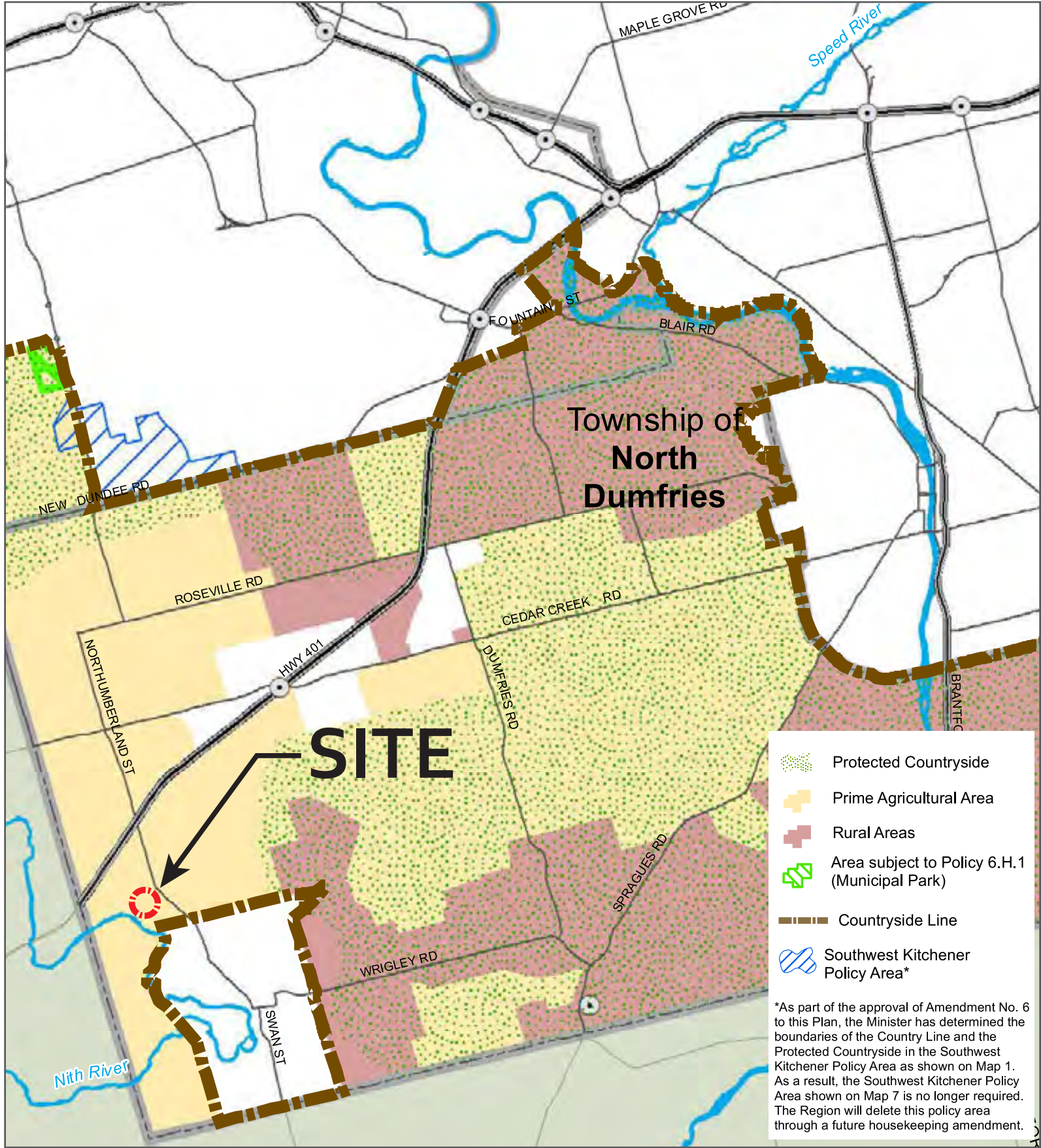
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**REGIONAL OFFICIAL PLAN, 2015**  
**MAP 4: GREENLAND NETWORK**

Site Location: Greenfield Mill, Ayr, ON



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-  Protected Countryside
-  Prime Agricultural Area
-  Rural Areas
-  Area subject to Policy 6.H.1 (Municipal Park)
-  Countryside Line
-  Southwest Kitchener Policy Area\*

\*As part of the approval of Amendment No. 6 to this Plan, the Minister has determined the boundaries of the Country Line and the Protected Countryside in the Southwest Kitchener Policy Area as shown on Map 1. As a result, the Southwest Kitchener Policy Area shown on Map 7 is no longer required. The Region will delete this policy area through a future housekeeping amendment.

Figure:

8

**REGIONAL OFFICIAL PLAN, 2015**  
**MAP 7: THE COUNTRYSIDE**

Site Location: Greenfield Mill, Ayr, ON



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fostering opportunities for current and future generations.” As part of this vision, Section 1.2.2 of the ROP speaks to the creation of thriving communities with a unique sense of place that conserves its rich history and cultural heritage, while also embracing innovation and change. Community amenities include education, public parks and open spaces, as well as recreational and entertainment opportunities.

The ROP has forecasted that Waterloo Region will grow to 923,000 people and 470,000 jobs by 2051, which represents 50 percent and 56 percent, respectively, between 2021 and 2051. The Township of North Dumfries is projected to accommodate an additional 8,300 people and 5,200 jobs over the planning horizon (Table 1).

The Site forms part of the “Prime Agricultural Area”, as illustrated on Map 7 to the ROP. The northern portion of the Site is located within the settlement area of Greenfield and is designated as “Rural Settlement Area” on Map 3. Rural Settlement Areas form part of the Prime Agricultural Area (Figure 6 to 8).

The following sections set out the applicable policies in the ROP, in consideration of the Proposed Redevelopment and the implementing Applications.

### Protected Countryside

Section 6 of the ROP sets out the policies related to the “Protected Countryside”, which includes both the “Prime Agricultural Area” and the “Rural Area”. Land within the Rural Area generally have lower class agricultural lands and are characterized by one or more of steep slopes, environmental features and/or existing non-farm lots. While the majority of the Site is designated as “Prime Agricultural Area”, in our professional opinion, it is more appropriately characterized as “Rural Area”, given that there are existing slopes and environmental features limiting agricultural use and the Site has historically been utilized for urban, non-agricultural uses.

Section 6 sets out the objective for the Protected Countryside: to protect the rural character of the countryside while supporting the development of strong and prosperous rural communities. This includes enhancing rural landscapes.

Further to Section 2.A.3 b), growth in rural settlement areas shall be limited and in accordance with the policies of Section 6. The expansion of rural settlement areas is detailed in Section 6.B.3 and 6.B.4, permitting minor expansions to facilitate the enlargement of an existing employment, recreational or institutional use subject to the provisions of Policy 6.G.8 and, where applicable, Policy 7.B.25.

Section 6.G.8 states that any expansions to rural settlement areas will require a local official plan amendment and will only be permitted at the time of a municipal comprehensive review, where:

- a) sufficient opportunities to accommodate the proposed employment, recreational or institutional use within existing Township Urban Areas, Rural Settlements or Rural Employment Areas are not available;

- b) the site is zoned for the specific use;
- c) within the Prime Agricultural Area designation;
- d) the land does not comprise a *specialty crop area*;
  - i. ii) there are no reasonable alternatives that avoid the Prime Agricultural Area; and
  - ii. iii) there are no reasonable alternatives on lower priority agricultural lands in the Prime Agricultural Area;
- e) the potential impacts on any surrounding agricultural operations are mitigated to the extent possible; and
- f) the minor expansion complies with all other applicable policies in this Plan.

It is noted that the term “municipal comprehensive review” no longer applies in the context of the PPS 2024 for the purposes of settlement area expansions.

As set out in Section 5-2 of this Report, it is our professional opinion that the proposed urban boundary expansion is appropriate, represents good land use planning and minimizes any impact on surrounding agricultural operations. The Site is not utilized for agricultural purposes, and has limited viability due to its slope, size and shape, along with the proximity to adjacent residential land uses. The use of the Site for agricultural purposes would result in the removal of the former mill building and its heritage significance.

### Natural Heritage

Policies related to the natural heritage system in the Region as provided in Section 7 of the ROP, and include Landscape Level Systems, Core Environmental Features, Fish Habitat, Supporting Environmental Features and the linkages among these elements, and lands designated within the Provincial Greenbelt Plan as Natural Heritage System.

The Site is identified as including “Significant Valleys” and “Core Environmental Features” (Map 4); however, Section 7.A.6 states that interpretation of the boundaries of Landscape Level Systems and Core Environmental Features, as required to support the review of development applications, will be achieved through the completion of Environmental Impact Statements or other appropriate studies in accordance with the policies in Section 7.G.

Significant Valleys include the valleys of the Nith River, which encompass the entire river channel within the Region and extend to the point where the slope of the valley begins to grade into the surrounding upland. Section 7.B.21 states that the Region will work collaboratively to conserve and enhance the cultural heritage resources of recreational and scenic value.

Core Environmental Features are those environmental features identified as being provincially significant or regionally significant (Section 7.C.1) and include Significant Woodlands and Environmentally Significant Valley Features. As part of a development application, an Environmental Impact Statement may be required to identify and evaluate the potential effects of a proposed development or site alteration on elements of the Greenlands Network, and recommend means of preventing, minimizing or mitigating these impacts, as well as enhancing or restoring the quality and connectivity of elements of the Greenlands Network. An Environmental Impact

Statement may also be used to identify and evaluate elements of the Greenlands Network and interpret the boundaries of these elements based on ecological considerations (7.G.1).

The EIS stated that, given the Proposed Redevelopment is largely composed of anthropogenic features (a former mill with associated informal parking areas), the impacts on the natural environment are expected to be limited to areas previously affected by anthropogenic activities. The biggest impact will be the loss of some mature trees within the road right-of-way. Native tree plantings can be used to offset the negative impacts of tree loss due to development. If native tree and vegetation plantings occur in the southern portion of the Site, it could increase the size and diversity of the natural area on the property to the south of the Site. Ongoing use and maintenance of the mill will ensure the chimney remains in good condition and available for Chimney Swifts. In this regard, the Proposed Redevelopment addresses the natural heritage policies of the ROP.

### Archaeology

Section 3.G.9 of the ROP requires the submission of an archaeological assessment conducted by a licensed archaeologist in accordance with the provisions of the Regional Archaeological Implementation Guideline following the Ministry of Tourism and Culture's Standards and Guidelines. The Owner has retained TMHC to prepare the Stage 1 and 2 Archaeological Assessment for the Site, with the indigenous consultants and background work underway. The Assessment will be submitted as part of the future Site Plan Application.

### Hazard Lands

Portions of the Site are within a one-zone floodplain. Area municipalities will include policies in their official plans that require detailed hydrogeological and/or geotechnical studies to assess potential risks to persons, buildings, structures, or public infrastructure resulting from groundwater discharge or high-water tables prior to development.

A Slope Stability Study was completed to demonstrate that the Proposed Redevelopment could be appropriately accommodated and that the necessary grading could be completed to ensure stable slopes.

The majority of development is located outside the defined floodplain, except for existing development within the floodplain and a small portion of the proposed loading area. Given the building's existing location and the need to provide safe access for loading, and considering the Site's grades, minor encroachments are proposed in the Conceptual Site Plan and the preliminary grading plan.

### Infrastructure Planning

Policies related to the provision of infrastructure and servicing are contained in Section 2.A and 5.B of the ROP.

Section 2.A.1 of the ROP states that, notwithstanding the permitted planning horizon under the PPS, the Region and the area municipalities may undertake integrated planning for infrastructure and public service facilities beyond the horizon of this Plan, provided that planning for infrastructure will not predetermine the form, pattern, or extent of an Urban Area or Township Urban Area boundary expansions.

The ROP supports the provision of municipal water and wastewater for urban development, with a priority to municipal services over communal or private services (5.B.2).

The Functional Servicing Report has demonstrated that suitable servicing solutions are available for full municipal servicing to support the Proposed Redevelopment.

### Site Contamination

Given the Site's historical use, consideration is given to the policies in the ROP related to contaminated sites. Section 2.L.3.1 states that where a development application is proposed on, or adjacent to, a known or potentially contaminated site, planning approvals will be subject to the submission of a Record of Site Condition in accordance with the provisions of the Regional Implementation Guideline for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated Sites.

As part of the Zoning By-law Amendment Application, the Owner is proposing a Holding Provision requiring a Record of Site Condition prior to the issuance of building permits on the Site.

### Cultural Heritage

The Site forms part of a cultural heritage landscape, and therefore Section 3.G.1 of the ROP applies to the Proposed Redevelopment. The Region and area municipalities will ensure that cultural heritage resources are conserved and will establish policies in their official plans to require the submission of a Cultural Heritage Impact Assessment in support of a proposed development that includes or is adjacent to a designated property or Cultural Heritage Landscapes.

### **Planning Analysis**

It is our opinion that the Proposed Development and Applications conform to the ROP.

The proposed adaptive reuse of the former Greenfield Mill as a community-oriented event space aligns with the ROP and its long-term vision for creating an inclusive, thriving, and sustainable Region through 2051. The ROP emphasizes the importance of building complete, resilient communities that draw on cultural heritage, support economic vitality, and make efficient use of existing land and infrastructure. The Greenfield Mill, a historically significant but abandoned building, represents an underutilized asset within the Region's settlement structure. Its revitalization directly supports the ROP's commitment to reusing and reinvesting in existing built-up areas, reducing land consumption, and strengthening the character and identity of established communities.

The ROP's founding vision highlights the Region's intent to connect urban and rural communities, foster innovation, preserve cultural heritage, and support economic opportunity. The Proposed Redevelopment addresses these policies by investing in a designated heritage resource into an event space that will support the local community and businesses. The adaptive reuse approach ensures that the mill's architectural character and cultural significance are preserved while enabling a new use that is compatible with surrounding land uses and supportive of community identity.

The ROP's growth management framework anticipates significant increases in population and employment across the Region by 2051 and directs municipalities to accommodate this growth through compact, efficient, and sustainable development patterns. The proposed event space contributes to these objectives by intensifying an existing site that is partially within a defined settlement area. In our professional opinion, the expansion of the settlement area to include the proposed developed portion of the Site does not result in the removal of viable agricultural land from the agricultural system and does not negatively impact surrounding farms. The Site has historically been utilized for urban uses, and the topography, parcel shape, and size would limit agricultural uses on the land.

The Proposed Redevelopment addresses the ROP's economic development goals by creating a unique venue that can host community events, cultural programming, and tourism-related activities. This supports local employment, enhances the Region's cultural offerings, and contributes to a diversified rural economy.

#### **5-4 TOWNSHIP OF NORTH DUMFRIES OFFICIAL PLAN**

The Township of North Dumfries Official Plan, 2018, establishes a policy framework to guide public- and private-sector decisions regarding development and the provision of community infrastructure and services over the planning horizon to 2031.

Goals of the OP include, but are not limited to:

1. To guide future land use decisions in the township in a manner that provides for the needs of existing and future residents, enhances the natural and human environment, separates incompatible land uses and ensures orderly development within the township.
2. To preserve, protect and encourage the continued use of prime agricultural areas for agricultural purposes.
3. To protect, conserve or wherever feasible, enhance the natural environment within the township.
4. To protect, conserve or wherever feasible, rehabilitate and/or reuse the cultural heritage resources of the township.
5. To provide for the management of natural resources within the township in a manner that minimizes undesirable short and long term impacts on the natural environment, the quality and quantity of ground and surface water, and the quality of life for existing and future residents.

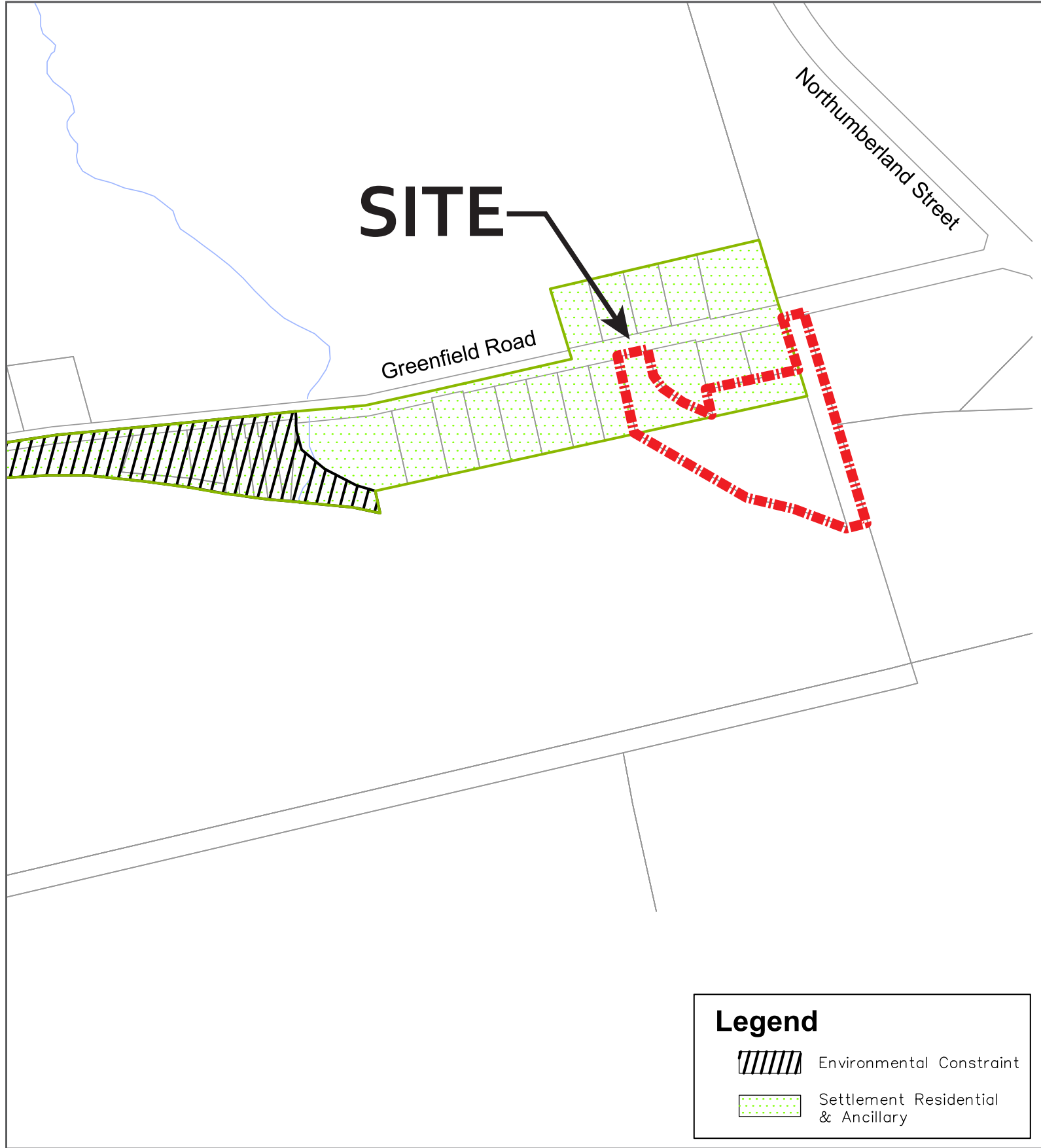


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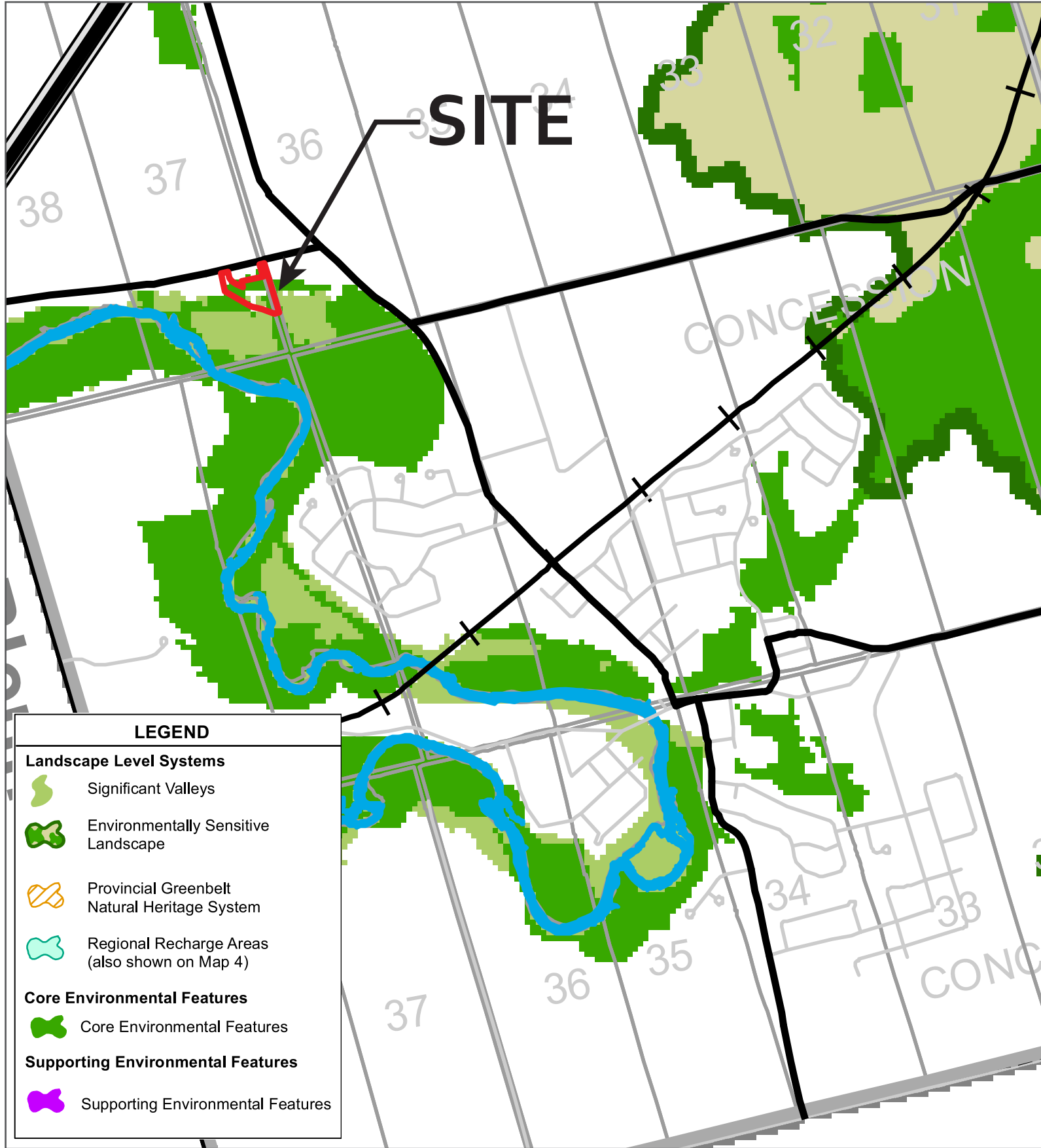
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**TOWNSHIP OFFICIAL PLAN, 2018**  
**MAP 2.8: GREENFIELD SETTLEMENT AREA**

Site Location: Greenfield Mill, Ayr, ON



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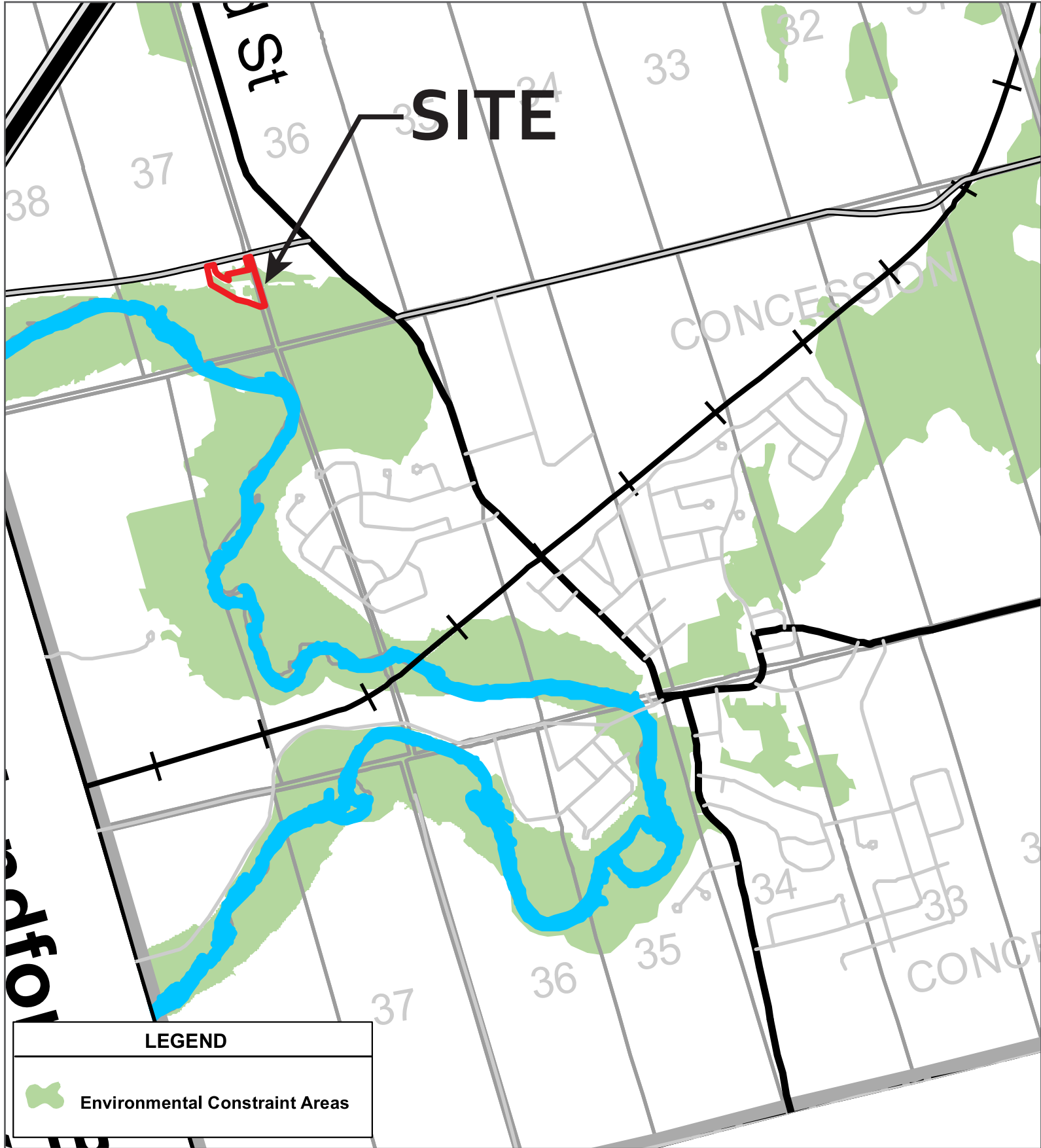


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**TOWNSHIP OFFICIAL PLAN, 2018**  
**MAP 5B: ENVIRONMENTAL CONSTRAINTS AREA**

Site Location: Greenfield Mill, Ayr, ON



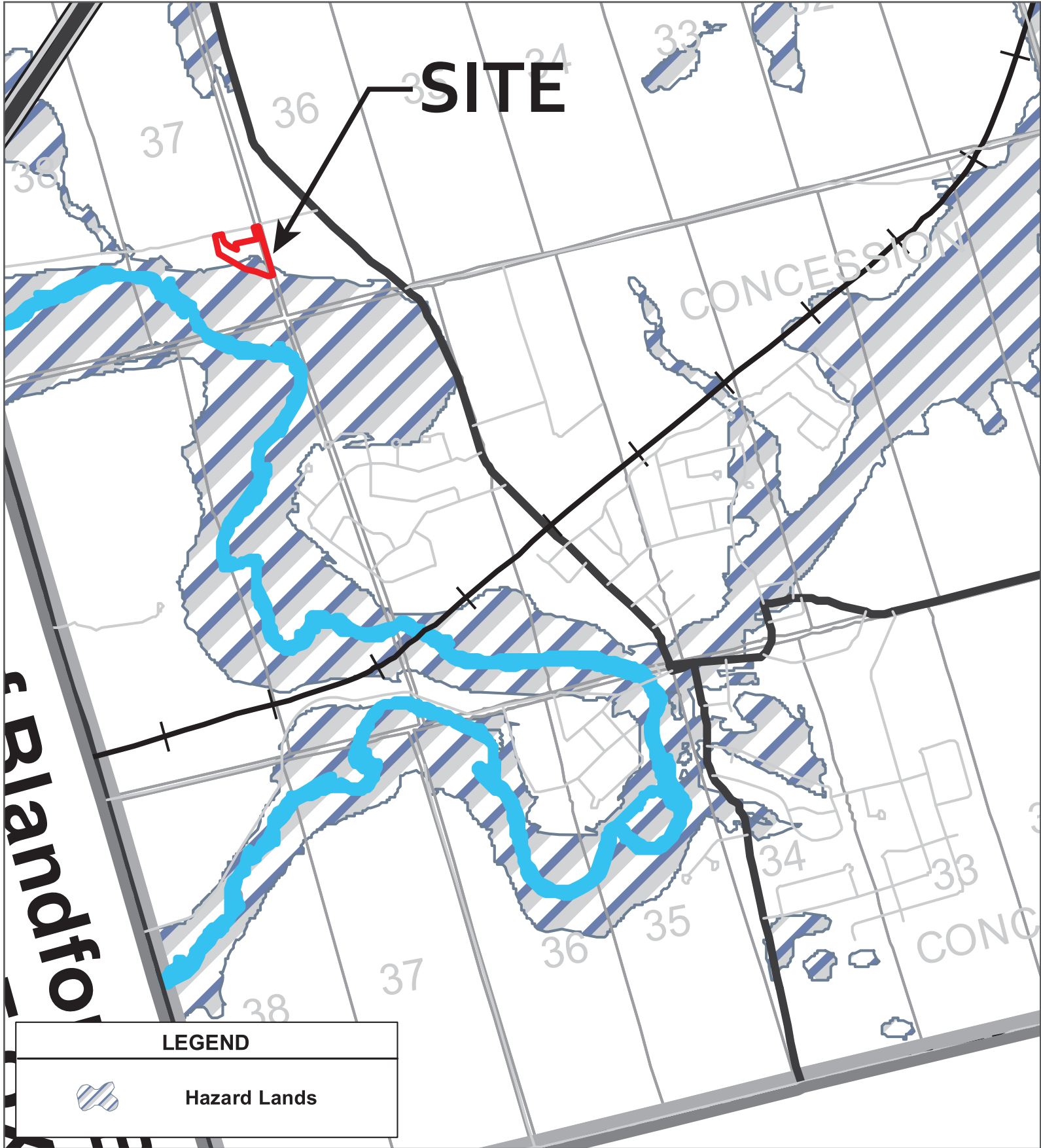


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**TOWNSHIP OFFICIAL PLAN, 2018**  
**MAP 5C: HAZARD LANDS**

Site Location: Greenfield Mill, Ayr, ON



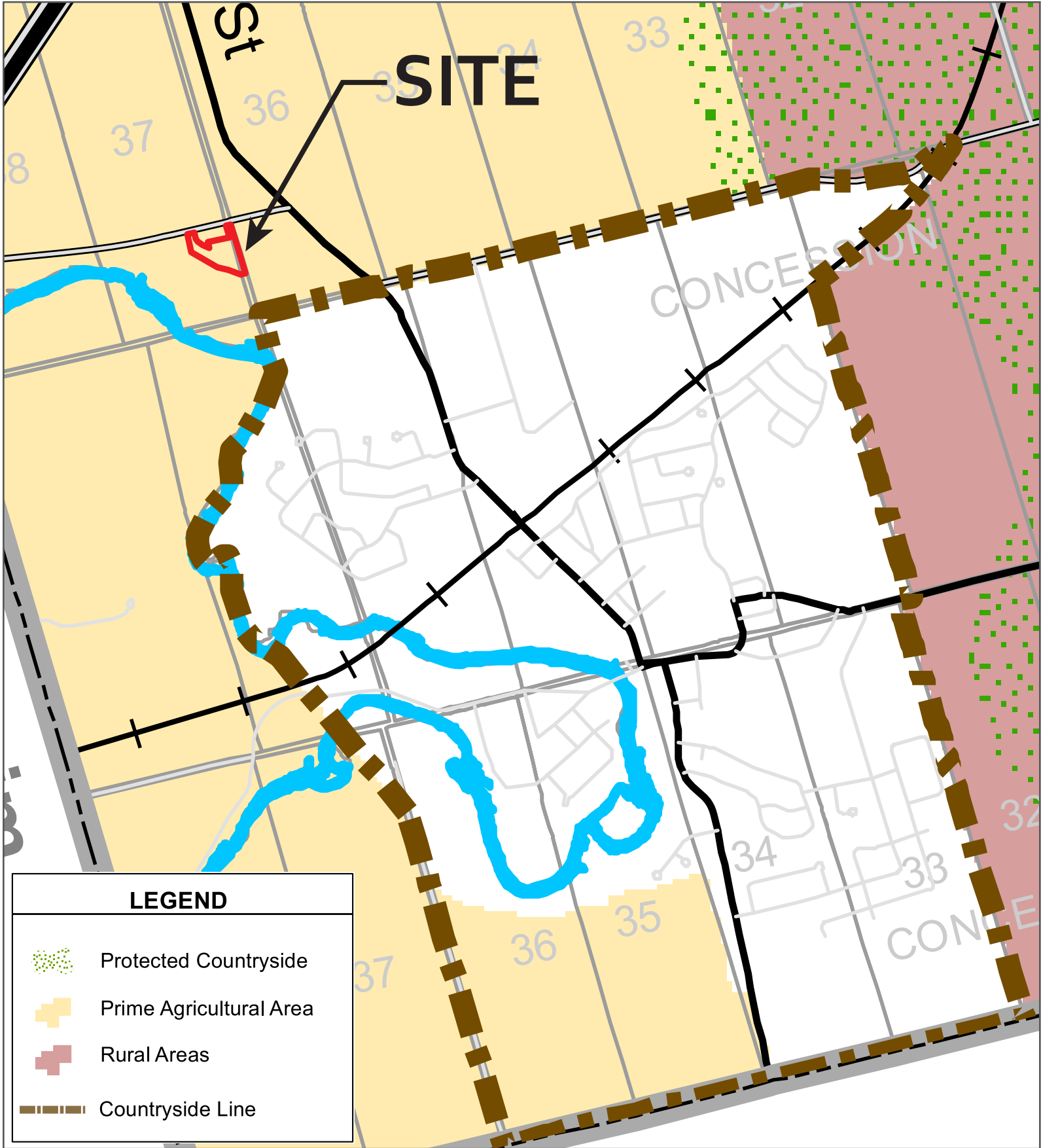


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**TOWNSHIP OFFICIAL PLAN, 2018**  
**MAP 7: THE COUNTRYSIDE**

Site Location: Greenfield Mill, Ayr, ON



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6. To minimize the threat to life and destruction of property from flooding and other natural hazards.
7. To concentrate the majority of growth in the township within the Ayr Urban Area, with limited growth in designated Rural Settlement Areas and Rural Employment Area where municipal services can be provided in a cost-effective and environmentally responsible manner.
9. To promote the expansion of existing businesses and the attraction of new businesses to the township to provide for a balance of residential and employment opportunities, and to support a strong and competitive economy.
10. To optimize the use of new and existing community infrastructure and services, and consider opportunities for adaptive re-use, to meet the current and future needs while minimizing land consumption and servicing costs.

The planning horizon to 2031 provides the following growth forecasts, with a statement in Section 1.6 of the OP that longer-term forecasts may be used based on the Regional Population and Employment forecasts.

	2006	2031
<b>Population</b>	9,200	16,000
<b>Employment</b>	6,080	8,700

The Region of Waterloo Official Plan provides a growth projection to 2051 of 19,600 people and 12,200 jobs.

The OP designates the Site as follows (Figure 9 to 13):

- Map 2.8: Rural Settlement Area (Northern Portion of the Site)
- Map 5A: Core Environmental Features and Significant Valleys
- Map 5B: Environmental Constraints Areas
- Map 5C: Hazard Lands
- Map 7: Prime Agricultural Area (Southern Portion of the Site)

### Rural Settlement Areas

The “Rural Settlement Area” policies are set out in Section 2.1.2 of the OPO, and apply to the township’s smaller settlement areas, such as hamlets and rural clusters that generally comprise a limited mix of residential, commercial and institutional uses serving primarily the local community. Given the limited servicing availability, these areas will experience limited growth, but they are noted as providing a significant role in the economic health and vitality of the township.

Section 2.9.1.4 of the OP may approve development proposals within Rural Settlement Areas and Rural Employment Areas provided that:

- a. any new lots can be appropriately serviced by private wells and *individual wastewater treatment systems*;

- b. any new development is compatible with the surrounding land uses in form and function; and
- c. the development proposal conforms to all other applicable policies of this Plan.

The expansion of existing Rural Settlement Areas will not be permitted, except as provided for in Policy 2.9.1.6 of this Plan and Section 6.G of the ROP. Section 2.9.1.6 states that, in collaboration with the Region, the Township may give consideration to permitting a minor expansion to a Rural Settlement Area for recreational or institutional uses, or to a Rural Employment Area for employment uses, to accommodate the future needs of the Township. Any such expansions will require an amendment to this Plan and will only be considered as part of the *municipal comprehensive review* of this Plan where:

- a) sufficient opportunities to accommodate the proposed employment, recreational or institutional use within the Ayr Urban Areas, Rural Settlement Areas or Rural Employment Areas are not available;
- b) the site is zoned for the specific use;
- c) within *prime agricultural areas*:
  - a. the land does not comprise a *specialty crop area*;
  - b. there are no reasonable alternatives that avoid the *prime agricultural area*;
  - c. there are no reasonable alternatives on lower priority agricultural lands in the *prime agricultural area*; and
  - d. the loss of *prime agricultural land* is minimized.
- d) the potential impacts on any surrounding agricultural operations are mitigated to the extent possible; and
- e) the minor expansion complies with all other applicable policies in this Plan.

Section 2.9.2.7.2 of the OP prohibits settlement area expansions in the Greenfield Settlement Area.

Commercial uses within the Rural Settlement Area shall be provided in the "Settlement Core Area" and shall be regulated through the Zoning By-law.

As set out in Section 5-4 of this Report, it is our professional opinion that the proposed expansion to the settlement area is minor in nature and is limited to the rear portion of the Site. In our opinion, the Site is appropriately characterized as urban with the long-standing historical use as a mill. The Site does not contain viable agricultural resources, and the proposed use of the land for urban purposes does not adversely affect surrounding agricultural operations. The residential development within Greenfield already limits surrounding agricultural operations, particularly in constructing livestock facilities.

In consideration of the other objectives of the OP, including natural heritage, hazard lands, transportation, servicing, heritage protection and economic development, the proposed settlement boundary expansion to permit the Proposed Redevelopment is desirable for the safe and prosperous development of land in the Township.

#### Prime Agricultural Area

Section 2.1.5 of the OP provides policies for the countryside areas in the Township and applies to all areas not located within the Ayr Urban Area, Residential Settlement Areas, Rural Employment Areas or the Urban Area. It generally includes both prime agricultural areas and rural areas with permitted uses including agricultural uses, agriculture-related uses and secondary uses. The Protected Countryside is intended to permanently protect these critical areas from urban development. Specific policies for the township's Countryside.

It is noted that the Site contains existing urban buildings that have been utilized for urban land uses. This is reflected in the OP designations, which place a portion of the Site within the Greenfield Settlement Area; however, the OP did not include the portion of the Site used for urban uses in the settlement area.

In our professional opinion, the size, shape, and topography of the Site limit the ability for viable agricultural uses. The Countryside also includes natural areas, and in our opinion, these natural areas are being appropriately preserved as part of the redevelopment, and the Owner is proactively seeking to minimize any grade changes on the Site.

#### Natural Heritage

Portions of the Site are located within areas identified as Core Environmental Features, Significant Valleys, and Environmental Constraint Areas in the OP as are a part of the Greenlands Network. These designations reflect the ecological sensitivity of the lands associated with the Nith River valley system and require evaluation of any proposed development to ensure that natural heritage features and their ecological functions are protected. The Proposed Redevelopment has been planned in consideration of these policy requirements, supported by an Environmental Impact Study (EIS) which delineates environmental features and their associated buffers, and confirms no negative impacts.

Section 6.1.1.2 of the OP establishes that the boundaries of environmental features within the Township's Greenlands Network must be interpreted through technical studies such as Environmental Impact Statements, watershed studies, or other appropriate analyses accepted by the Township, Region, and relevant agencies. Consistent with this requirement, the Owner has completed a comprehensive EIS to accurately delineate the extent of natural heritage features on the Site, including the valley slope, floodplain, and associated ecological functions. The EIS identifies the limits of the Significant Valley and Core Environmental Features and establishes the appropriate protection zones and buffers required to ensure long-term ecological integrity.

Section 2.6.12 of the OP provides that permitted uses within Environmental Constraint Areas may include agriculture, conservation, appropriate recreational uses, and forestry and wildlife management. The OP further allows additional uses within buffer and setback areas, provided they conform to the policies of Sections 6.1 and 6.2. The Proposed Redevelopment generally locates development outside the regulated hazard lands and within the portion of the Site that has historically been developed for urban land uses. The EIS concludes that the Proposed Redevelopment, in consideration of compensation, will not have negative adverse impacts on the identified natural features.

The Site is also identified as containing a Significant Valley, associated with the Nith River. Significant Valleys are defined in the OP as encompassing the entire river channel and extending upslope to the point where the valley transitions into the surrounding upland. Section 6.1.4.3 requires that all development applications within or contiguous to Significant Valleys be evaluated in accordance with the policies of both the OP and the ROP.

The OP's Core Environmental Features policies provide additional direction for lands that meet the criteria established in the ROP, including Significant Habitat of Endangered or Threatened Species, Provincially Significant Wetlands, Environmentally Sensitive Policy Areas, Significant Woodlands, and Environmentally Significant Valley Features. Section 6.7.1.3 outlines these criteria and establishes the basis for identifying Core Environmental Features within the Township. While portions of the Site fall within this designation, the EIS confirms that there is no negative impact on these features.

Section 6.7.1.5 of the OP states that development or site alteration may only be permitted on lands contiguous to a Core Environmental Feature where an EIS has demonstrated, to the satisfaction of the Township, Region, GRCA, and other applicable agencies, that the proposed development will not result in adverse environmental impacts on the feature or its ecological functions. The EIS prepared for the Greenfield Mill redevelopment concludes that the proposed development will not negatively impact the Core Environmental Feature, as all new construction and site alterations are confined to the previously disturbed portion of the Site and remain outside the required buffer.

Section 6.7.1.6 requires that an EIS identify appropriate buffers to Core Environmental Features, ensuring that these buffers protect ecological functions and provide opportunities for habitat enhancement or restoration. The EIS establishes a buffer that aligns with GRCA requirements and reflects the physical constraints of the valley slope and floodplain. The redevelopment respects this buffer by maintaining the majority of all new development outside the regulated area.

#### Hazardous Lands

The OP identifies natural hazards as including both hazardous lands and hazardous sites—areas possessing physical characteristics that could result in property damage or loss of life if developed inappropriately. Section 6.4.1 of the OP provides that minor revisions to the boundaries of these areas may be permitted without an amendment to the Official Plan, provided that such changes are supported by technical studies approved by the GRCA. Section 6.4.2 further establishes that lands identified as hazardous will also be designated as Environmental Constraint Areas on Map 5B and zoned in the Township's Zoning By-law to prohibit the construction of buildings or structures. Building setbacks from lands shown as Hazard Lands are to be established or modified, as appropriate, in consultation with the GRCA to ensure adequate protection from flooding and erosion hazards.

The OP provides limited flexibility for existing structures located within regulated floodplains. Section 6.4.7 permits minor expansions or alterations to existing buildings and structures within hazardous lands or sites identified by the GRCA as part of the Regulatory Floodplain, subject to

conditions. Such works must be approved by the GRCA, supported by appropriate permits, and must not result in the creation of new dwelling units or buildings. No new flood space may be created below the elevation of the first floor, including basements, and all renovations or additions must be flood-proofed in accordance with GRCA requirements. These provisions ensure that existing structures can be maintained and improved without increasing risk to life or property.

In our professional opinion, the Proposed Redevelopment and the associated technical studies have considered these policies to ensure that the majority of new development is located outside the floodplain and that the area proposed for earthworks has stable slopes. Minor rounding of the floodplain is proposed to allow for the required loading space. There are limited alternative locations for the loading space, given the building's existing layout, the Site's grades, and the Site's overall operation.

### Cultural Heritage

The OP includes policies on the conservation and enhancement of cultural heritage resources. Section 7.1.5 of the OP states that any proposed development or site alteration involving a designated heritage property or a non-designated resource listed on the Township's Heritage Register must be supported by a Cultural Heritage Impact Assessment (CHIA). This assessment must include historical research, site analysis, and an evaluation of the resource's significance and heritage attributes, along with a detailed description of the proposed development, an assessment of potential impacts, and an examination of alternatives, mitigation strategies, and conservation methods. It must also outline an implementation and monitoring framework and conclude with a summary statement and conservation recommendations. The Official Plan further establishes a clear hierarchy of preferred conservation approaches under Section 7.5.5. The Township's priority is the rehabilitation and incorporation of the heritage resource and its surrounding context directly into the proposed development.

The HIA concluded that while the Proposed Redevelopment will result in the loss of certain historic building components and landscape elements, these impacts are justified within the broader context of adaptive reuse, structural realities, and long-term conservation goals. With the implementation of the recommended mitigation and conservation measures, the proposal represents a defensible and appropriate balance among heritage conservation, functional reuse, and community compatibility, thereby securing a sustainable future for the Greenfield Mill as a valued cultural heritage resource within the Greenfield Village Heritage Conservation District.

The HIA also concluded that allowing the property's inclusion in the Greenfield settlement area, to which it has historically contributed over the past 170 years, and permitting extended uses support the long-term conservation of this significant cultural heritage resource and the overall Greenfield Heritage Conservation District.

### Archaeological Assessments

Section 7.6.1 of the OP states that during the review of development applications, the Township will require the applicant to submit an archaeological assessment by a licensed archaeologist. The Owner

has retained TMHC to prepare the Stage 1 and 2 Archaeological Assessment, and a Holding Provision is proposed for the Zoning By-law Amendment until such time as this assessment is entered into the Registrar. The required work associated with the Stage 1 and 2 Archaeological Assessment has commenced.

### Land Use Compatibility

The OP provides policies regarding land compatibility to ensure that new development considers the density, scale, height, massing, visual impact, architectural character, and preservation of natural and built heritage resources in the context of the surrounding area (Section 3.1.1.1). The policies also direct the Township to consider pedestrian and vehicular movement, parking needs, landscaping, setbacks, buffering, and potential impacts related to noise, dust, emissions, odour, and traffic.

The OP requires that development prevent or minimize adverse effects on sensitive land uses by ensuring that noise, odour, and other contaminants are appropriately mitigated, and by encouraging compatible uses or adequate separation where potentially incompatible uses interface.

The Proposed Redevelopment of the Site conforms to these policies through a combination of technical evidence, site design, and physical separation. The Noise Feasibility Study confirms that the proposed use can operate without generating adverse noise impacts on nearby residential properties, in keeping with provincial guidelines.

The Parking Utilization Study demonstrates that the 110-space parking supply is adequate and will not result in spillover parking into the surrounding neighbourhood. The Traffic Impact Study similarly concludes that the development will not create unacceptable traffic impacts on Greenfield Road or the broader road network.

The Conceptual Site Plan incorporates 1.5-metre landscaped buffers, naturalized planting areas, and limited street-frontage parking, ensuring that the development's visual impact is softened and the rural character of Greenfield Road is maintained. Cross-section analyses prepared for the application illustrate the substantial physical separation between the Proposed Redevelopment and the low-density residential dwellings along Greenfield Road, with the existing mill building set back approximately 50 metres from the street and the proposed addition set back approximately 60 metres. This separation, combined with the intervening landscaping and the natural topography of the Site, ensures that the development does not create adverse shadow, overlook, or massing impacts.

Collectively, the technical studies and site design demonstrate that the Proposed Redevelopment meets the Township's compatibility objectives, avoids adverse effects on surrounding sensitive land uses, and represents an appropriate and context-sensitive reuse of a significant heritage property.

### Contaminated Sites

Section 3.1.2.1 of the OP states that known, suspected or potentially contaminated site shall not be granted planning approvals until a Record of Site Condition has been completed in accordance with

the Ministry of the Environment Guideline for Use at Contaminated Sites. The Owner is proposing a Holding Provision to require an RSC to be submitted to the Township prior to development on the Site to address these policies in the OP.

### Transportation

Policies related to transportation are provided in Section 3.3.4 of the OP, stating that an applicant shall submit a traffic study to the satisfaction of the Township where traffic volumes warrant a study. In response, a Traffic Impact Study has been prepared, which concluded that off-site improvements are not required and the proposed supply of off-street parking is appropriate for the nature of the proposed use.

### Servicing

Sections 3.4.1.1 and 3.4.2.1 of the OP address servicing requirements for development in the Township. Priority shall be given to full municipal servicing and the ability to extend municipal services. In this regard, the Owner proposes extending municipal services to the Site to meet the OP policies for achieving development with full municipal services.

### Economic Development

The OP promotes economic development in Section 4.1.2 of the OP, including providing for an appropriate mix of employment uses, including industrial, commercial and institutional uses, to meet long-term needs. Furthermore, the OP supports a diversified economic base that considers the needs of existing and future businesses.

### **Planning Analysis**

In summary, it is our professional opinion that the Proposed Redevelopment conforms to the overarching goals and policy direction of the ROP, which seeks to guide growth, protect natural and cultural resources, minimize risks associated with natural hazards, and support the efficient use of existing infrastructure.

The adaptive reuse of the historic mill advances the ROP's objective of conserving, rehabilitating, and reusing cultural heritage resources, while reinvesting in an existing building footprint and avoiding unnecessary land consumption.

The proposed expansion of the settlement area boundary is minor in nature and reflects the Site's historical urban use. The expansion does not result in the removal of agricultural land, nor does it preclude surrounding agricultural uses.

Matters related to land-use compatibility, natural heritage, hazard lands, traffic, servicing, urban design, and heritage protection have been appropriately addressed through the submitted technical studies supporting the Proposed Redevelopment.

## 5-5 TOWNSHIP OF NORTH DUMFRIES ZONING BY-LAW

The Site is zoned as follows in the Township of North Dumfries Zoning By-law No. 689-83 (Figure 14):

- “Zone 3 (Z.3)” - Rural Residential for the portion of the Site located within the Greenfield Rural Settlement Area
- “Zone 1 (Z.1) - Agricultural on the southern half of the Site
- Site-Specific Exemption 20.1.150 is applied to the subject property, which establishes minimum lot area and frontage requirements.

The Owner is requesting that the developable portion of the Site and the municipal road allowance be rezoned from “Z.3” and “Z.1” to a site-specific “Zone 7 (Z.7) – Holding Provision” and the removal of site-specific regulation 20.1.150:

“20.1.\_\_\_\_\_

### Permitted Uses

- Assembly or Banquet Hall, defined as “a service commercial establishment used for the purposes of catering to banquets, weddings, receptions or similar functions (e.g. political, civic, religious, social, educational, recreational) for which food and beverages are prepared and served on the premises, and which may include a catering service.
- Indoor and outdoor uses, accessory to permitted use(s).

### General Use Regulations

Notwithstanding the Provisions of Section 13.3, the following provisions shall apply:

- No buildings shall be erected in a Zone 7 - Z.7 within 15 metres of the limit of any Zone 2, 2a, 3, 4, 4a or 5
- Minimum front and side yard setbacks to a property line of 15 metres
- Minimum lot frontage: 20 metres
- Maximum Building Height: 20 metres
- Minimum Off-Street Parking: a minimum of one (1) off-street parking space per 22 square metres of gross floor area
- Off-street parking shall be permitted in any yard, provided a 1.5 metre landscape buffer is provided

### Holding Provision (H)

- No development of the lands shall be permitted until such time as the following is provided to the Township of North Dumfries to the satisfaction of Township staff and the removal of the Holding Provision:
  - Ministry of the Environment, Conservation and Parks Record of Site Condition

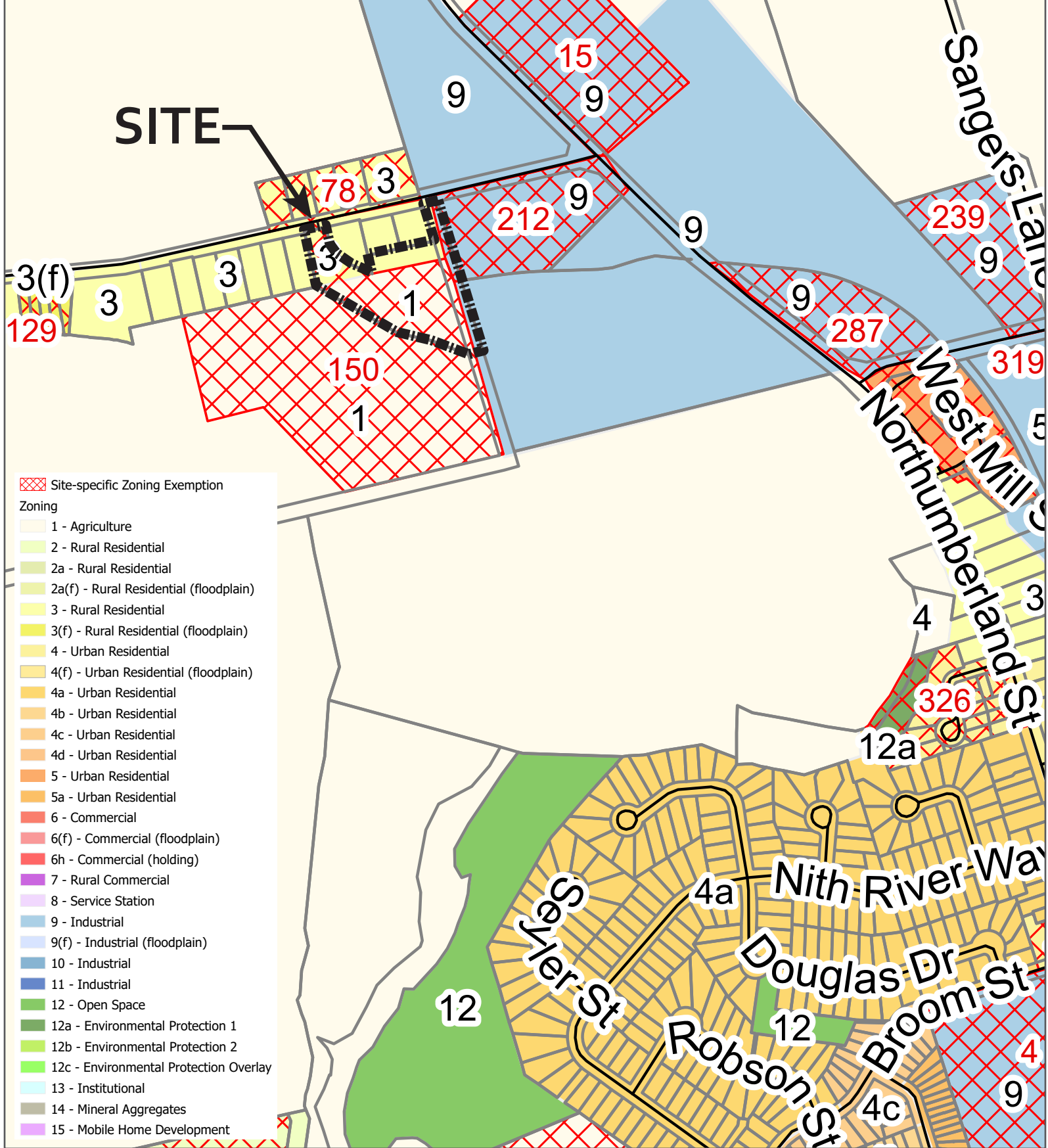


Figure:

14

**AYR ZONING BY-LAW**

Site Location: Greenfield Mill, Ayr, ON



**BAKER**  
Planning Group

- Ministry of Citizenship and Multiculturalism Enter into the Registrar Archaeological Assessment

The following table sets out the zoning provisions within the Z.7 Zone and the Proposed Redevelopment:

**Table 5-2: Z.7 Zoning Analysis**

Regulation	Z.7	Proposed	Complies?
Minimum Lot Area	As existing	2.85 ha	Yes
Minimum Lot Frontage	As existing	> 30m	Yes
Maximum Building Height	13.5m	18m	No
Buffer Strips	1.5 m	1.5 m	Yes
Minimum Rear Yard	7.5 m	19.88	Yes
Enclosed Buildings	The operation of every commercial use shall be conducted entirely within an enclosed building or structure without any "curb service" or similar activity and there shall be no outdoor storage or display of goods or material	No "curb service" proposed; however event photography may be outside	Yes
Location of Off-Street Parking	All off-street parking areas shall be situated to the rear of the building line or lines.	Located in the front and side yard setbacks	No
Minimum Off-Street Parking	See table below.	1 space per 22 square metres proposed	Yes
Minimum Off-Street Loading	1 per 2,300 sq.m. of GFA = 1	1	Yes
Off-Street Loading Size	3.5m by 10.5m	3.5m by 10.5m	Yes

The following table summarizes the required off-street parking in the Zoning By-law.

**Table 5-3: Z.7 Parking Analysis**

Regulation	Area/Capacity	By-law Requirement	Calculated Parking Supply per By-law
Venue Space 1	4,765 sq.ft (150 persons)	1 space for every 7 seats or 8 centre, spaces for each 100 sq.m. (1,075 sq.ft.) of floor area available to the public, whichever is greater.	70
Venue Space 2	2,100 sq.ft. (80 persons)		
Hair Salon/Bridal Suite	1,185 sq.ft. (20 persons)		

Regulation	Area/Capacity	By-law Requirement	Calculated Parking Supply per By-law
Groom's Suite	1,355 sq.ft. (20 persons)		
Restaurant	2,275 sq.ft.	1 space for each 4.5 sq.m. (50 sq.ft.) of floor area devoted to public use	88
Coffee Shop	365 sq.ft.		
Wine Cellar	1,755 sq.ft.		
Retail Space/Office	2,185 sq. ft	1 space for each 18.5 sq.m. (200 sq.ft.) of floor area devoted to public use	11

In our professional opinion, the proposed site-specific provisions and the Holding Provision are appropriate for the comprehensive redevelopment of the Site, as outlined below.

#### Permitted Uses

The Zoning By-law does not include a specific land-use definition for an event space; accordingly, the Owner is requesting an additional permitted use within the Z.7 Zone. Based on the technical studies and analysis in this Report, it is our professional opinion that the proposed use is compatible and appropriate for the Site. Matters related to traffic, noise, buffering and servicing have been considered and addressed, demonstrating no negative impact to the surrounding residential uses.

#### Building Height

A site-specific provision is included in the Zoning By-law Amendment to recognize the existing building height of the former mill building. The inclusion of this provision does not alter the existing built form on the Site.

#### Building Setbacks

The Owner is proposing specific building setbacks, exceeding the requirements in the Z.7 Zone, to ensure appropriate separation from existing adjacent low-density residential land uses. A minimum setback of 15.0 metres is proposed; however, the Conceptual Site Plan exceeds this minimum and reflects the building's existing location on the Site. The Proposed Redevelopment does not result in new buildings in closer proximity to the existing low-density land uses. The cross-section, prepared by MSS Architects, demonstrates the vertical and horizontal separation of the development to the residential uses. Overlook from the Proposed Redevelopment is limited to adjacent residential uses given the horizontal and vertical separation.

#### Parking

As outlined in the Traffic Impact and Parking Justification Study Report, the Zoning By-law Amendment requests specific off-street parking rates based on the proposed use. The Zoning By-law does not have a specific parking rate for the proposed use. The only parking standard that may apply is for all other uses not defined at 1 parking space per 45 square metres of gross floor area.

The Traffic Impact and Parking Justification Study Report proposes an off-street parking rate of 1 space per 25 square metres.

## 6 SUMMARY

The proposed Amendment Applications for the Site seek to enable the adaptive reuse of the historic Greenfield Mill as an event facility, representing a context-sensitive redevelopment that restores a significant cultural heritage resource while reinvesting in an underutilized site.

In our professional opinion, the Proposed Redevelopment is consistent with the Provincial Planning Statement, 2024, which encourages the regeneration of rural settlement areas, the redevelopment of brownfield sites, and the leveraging of cultural and natural assets to support rural economic vitality. The PPS also permits settlement boundary expansions where justified, and the Report concludes that the Site has not and would not be utilized for agricultural purposes and has historically contained a non-agricultural use and that the minor expansion recognizes that the Site forms part of the built-heritage of Greenfield.

Technical studies confirm the Site can be fully serviced, that traffic operations remain acceptable, and that stormwater, slope stability, and natural heritage constraints are appropriately addressed. The Environmental Impact Study demonstrates that impacts are limited to previously disturbed areas and can be mitigated through compensation planting, while the Cultural Heritage Impact Assessment finds that although some components will be removed, the redevelopment strengthens the long-term conservation prospects of the property through adaptive reuse and represents the most balanced and feasible conservation approach given structural conditions.

The proposal conforms to the Region of Waterloo Official Plan by reinvesting in an existing rural settlement area, supporting economic development, conserving cultural heritage, and using existing and planned infrastructure efficiently. It also conforms to the Township of North Dumfries Official Plan by protecting natural features, addressing hazard lands through slope-stability and floodplain analyses, supporting economic diversification, and optimizing the reuse of existing buildings and infrastructure.

The requested Zoning By-law Amendment introduces a site-specific Z.7 zone with appropriate setbacks, height recognition for the existing mill, and a Holding Provision requiring a Record of Site Condition and Archaeological Assessment prior to development.

Overall, the adaptive reuse of the Greenfield Mill represents good planning: it conserves a significant heritage resource, introduces a compatible and desirable community-serving use, protects natural and hazard-related features, supports rural economic vitality, and makes efficient use of land and infrastructure. The Applications are consistent with the PPS, conform to the Region and Township Official Plans, are appropriate and compatible within the Greenfield context, and are in the public interest.