

August 24, 2026

Brett Salmon, Managing Director of Planning and Development
Township of Centre Wellington
1 MacDonald Square

Elora ON

N0B 1S0

Dear Mr. Salmon:

RE: Zoning By-law Amendment for 65-69 Bridge Street (formerly 1 Clarke Street)
OUR FILE 24277B

Introduction

We are pleased to submit an application for Zoning By-law Amendment on behalf of our clients Elora Greens Housing Development for lands known as 65-69 Bridge Street in the Village of Elora and shown in red on the **Figure 1** below. The subject lands are irregularly shaped and comprise 2 vacant parcels of land with a total area of 1016 sq. m. (0.25 acres) in a medium density residential area. A single detached dwelling is located on the lands addressed as 1 Clarke Street, while lots 65 and 69 Bridge Street are vacant and located in behind 1 Clarke Street. These lots were previously created by consent and were severed from 1 Clarke Street. The subject lands are located north of the industrial uses fronting onto First Line and adjacent to a portion of the Elora-Cataract Trail, locally known as the 'Trestle Bridge Trail'.



Figure 1-Subject Lands 65-69 Bridge Street

Site context

The subject lands are surrounded by residential land uses to the north, west and east. The residential area consists of single detached, semi-detached and town houses. Lands to the south of the subject lands include recreational lands comprised of the Elora-Cataract Trail, which is adjacent to the southern property line of 69 Bridge Street. Lands further to the south include industrial lands known as the Jefferson Elora Corporation and the Elora Water Tower lands. Lands south of First Line are currently designated as agricultural but have recently been included in the settlement area boundary for a combination of employment and residential lands. South Ridge Park is located to the southwest of the subject lands along the opposite side of Bridge Street. Lands to the southwest contain commercial use including a grocery store with frontage onto Wellington County Road 7. See Figure 2 below.

Figure 2 below the  shows the subject lands.



Proposal

The subject lands have been previously severed from 1 Clarke Street and are currently vacant and are intended to be developed with 4 street fronting freehold Townhomes with basement designed to allow an additional dwelling unit, should the purchaser wish to do that. This development will allow for modest residential infilling. The lands will require a zoning by-law amendment to an R3 zone which permits the townhouse use, as they are currently zoned R1-A, which does not permit townhouse dwellings. As the intent is to create these as freehold street fronting towns, individual lots per townhouse unit will be created through consent. A pre-consultation meeting was held with the Township of Centre Wellington on May 21st, 2026 and the meeting record has been enclosed with the application.

Severance applications to create one new lot and retain one lot for each original lot (65 and 69 Bridge Street) has been submitted to the County of Wellington concurrently with the zoning by-law application submitted to the Township. As the townhouses will straddle the property line between lot 65 and lot 69 Bridge Street, we are also seeking relief from the side yard setback for the internal lot lines and proposing a 0 lot line for the attached internal units through a site-specific regulation which would also permit a slight increase in the units per hectare from 35 units per hectare to 39 units per hectare. The proposed lots comply to all other zoning regulations. This allows the townhouses to be pushed further back from the front lot line, thereby providing for two on-site parking spaces per unit rather than one (not including the garage), which provides an additional space per unit for a total of 12 potential parking spaces for the entire development. Additionally, each lot maintains a minimum of 40 % open space landscaped area. The proposed zoning by-law amendment will be further discussed below.

Policy Analysis

Planning Act

Section 2 of the Planning Act outlines matters of Provincial interest that one shall have regard for when making a development application. Of particular relevance to this application to develop the subject lands with a four-unit townhouse include:

The Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as:

- (a) the protection of ecological systems, including natural areas, features and functions;
- (b) the protection of the agricultural resources of the Province;
- (e) the supply, efficient use and conservation of energy and water;
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- (h) the orderly development of safe and healthy communities;
- (j) the adequate provision of a full range of housing, including affordable housing;
- (p) the appropriate location of growth and development;
- (r) the promotion of built form that,
 - (i) is well-designed,

(s) the mitigation of greenhouse gas emissions and adaptation to a changing climate.

As the proposed townhouse development is situated within the urban area's built boundary, natural and agricultural areas are protected from development impacts. The subject lands will make more efficient use of infrastructure such as sewage, water, transportation and will result in the orderly development of the lands as they are located within the settlement area which is the focus for development and already has existing services that can accommodate this development. The townhouse will contribute to the provision of a full range of housing options. The proposed townhouse built-form will be well designed to compliment the existing neighbourhood in a scale that is reflective of the character of the area. Modest intensification makes better use of infrastructure, may help reduce the greenhouse gas emissions through efficient and more compact development and better use of infrastructure.

Section 51 (24) outlines criteria for subdivision of land and as the lands are not within a plan of subdivision the proposed 4 lots for each of the townhouse units will require consent to create the lots. The following criteria are of particular relevance to this development.

- (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;
- (b) whether the proposed subdivision is premature or in the public interest;
- (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;
- (d) the suitability of the land for the purposes for which it is to be subdivided;
- (e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;
- (f) the dimensions and shapes of the proposed lots;
- (h) conservation of natural resources and flood control;
- (i) the adequacy of utilities and municipal services;
- (j) the adequacy of school sites;
- (l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and

The subject lands have addressed matters of provincial interest as referred to in Section 2 of the Planning Act, conforms to both the County and Township official plans, the lands are suitable for the proposed development. The dimensions and proposed shapes of the proposed 4 lots are appropriate to accommodate this development. The subject lands are located in the built-up area which has adequate existing services, utilities, roads, schools and soft infrastructure to support this development.

Therefore, the proposed development has regard for the Planning Act.

Provincial Policy Statement (PPS 2024)

Section 2.1.4 directs municipalities to provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents by maintaining at all times, the ability to accommodate residential growth for a minimum of 15 years.

This modest infill development will provide housing choice at a slightly higher density than single detached homes in the townhouse built-form option. The modest intensification of the subject lands will contribute toward the Township's provision of a housing supply for 15 years.

Section 2.1.6 requires planning authorities to support the achievement of complete communities by accommodating an appropriate range of and mix of land uses, housing options, transportation options, with multi modal access, employment, public service facilities, institutional facilities, recreation, parks and open space all to meet long-term needs.

The subject lands are ideally situated within a neighbourhood that provides a mix of land uses including employment and residential, is close to transportation routes, as well as active transportation trails. The provision of townhouses to this low-density residential area will provide a housing option for the residents in addition to single detached or semi-detached options and is well situated close to park and open space lands. The development of the subject lands for a townhouse use will contribute to the creation of a complete community.

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

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

The development of the subject lands for townhouses helps the municipality provide for a range and mix of housing that can appeal to a broader demographic including but not limited to people wishing to age in place or first-time home buyers just entering the real estate market. The modest

intensification of the subject lands introduces a new housing option in this predominantly single detached neighbourhood and makes for more efficient use of services and infrastructure.

Section 2.3.1 General Policies for Settlement Areas requires that

1. *Settlement areas* shall be the focus of growth and development. Within *settlement areas*, growth should be focused in, where applicable, *strategic growth areas*, including *major transit station areas*.
2. Land use patterns within *settlement areas* should be based on densities and a mix of land uses which:
 - a) efficiently use land and resources;
 - b) optimize existing and planned *infrastructure* and *public service facilities*;
 - c) support *active transportation* ;
 - d) are *transit-supportive*, as appropriate;
3. Planning authorities shall support general *intensification* and *redevelopment* to support the achievement of *complete communities*, including by planning for a range and mix of *housing options* and prioritizing planning and investment in the necessary *infrastructure* and *public service facilities*.
4. Planning authorities shall establish and implement minimum targets for *intensification* and *redevelopment* within built-up areas, based on local conditions.

The subject lands are located within the Village of Elora Settlement area. As noted above settlement areas are the focus area for growth and development. The proposed townhouse developments will contribute to the mix of land uses and will use the land and services and resources more efficiently. The lands are adjacent to active transportation trails and are within a neighbourhood that is walkable. This development will contribute in a modest way to the achievement of overall intensification within residential within a stable neighbourhood and is of a small scale that is appropriate and compatible with the area.

Section 2.5 provides direction for Rural Areas in Municipalities as follows.

1. Healthy, integrated and viable rural areas should be supported by:
 - a) building upon rural character, and leveraging rural amenities and assets;
 - c) accommodating an appropriate range and mix of housing in rural settlement areas;
 - d) using rural infrastructure and public service facilities efficiently;
2. In rural areas, rural settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted.

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

The subject lands are located in the Village of Elora, which is a settlement area within the broader rural system within the Township of Centre Wellington. The proposed townhouse development builds on the character of the area in that it is another low-rise built form housing option that helps provide a mix of housing options or choice within the Township. Section 2.5.2 above also directs the focus of development and growth to the rural settlement areas. As Elora is a village within the built boundary it is the focus for development over rural areas that surround the settlement area.

County of Wellington Official Plan

The subject lands are situated within the rural fabric of the county Official Plan and are located within the delineated Built-up Area boundary of the Village of Elora Settlement Area, which is a Primary Urban Centre of the Urban System. The Urban System includes the larger urban places in Wellington, which are expected to accommodate the majority of growth over the planning period.

Policy 7.3 directs development based on municipal services which promote environmental protection and efficient land use will be encouraged. Land use patterns in the urban system shall be based on:

- a) densities and a mix of land uses which:
 - i) efficiently use land and resources;
 - ii) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; and
 - iii) minimize negative impacts to air quality and climate change, and promote energy efficiency.
- b) a range of uses and opportunities for intensification and redevelopment.

Primary urban centre policies are expected to provide the greatest opportunities for growth in Wellington.

Policy 7.4.5 directs that Primary Urban Centres shall provide a broad range of residential uses to provide a diverse supply of housing, including affordable housing. Wellington will plan for a diverse range and mix of housing options, densities, and unit sizes on full municipal services.

The proposed townhouse development is located within the primary urban centre (Village of Elora) which is the focus area for development in the County of Wellington Official Plan, as full municipal services are available. The modest intensification proposed by the townhouse development will make more efficient use of existing infrastructure and will contribute to the provision of a range and mix of housing as a density that is supported by the infrastructure and conforms to the County of Wellington Official Plan.

Township of Centre Wellington Official Plan

Policy C.5.1 within the Township of Centre Wellington Official Plan encourages the production of a wide range of housing types to meet future housing need. The policy also states that Council shall provide for the opportunity, through subdivision approval and zoning bylaw approvals, for a variety of housing types to be provided. Prior to approving new development or redevelopment, Council will consider the housing need within the community and the housing market area and provide opportunities for a range of housing types throughout the community that are appropriate given existing site conditions, neighbouring developments, and servicing options.

Policy C.5.5 provides direction for residential intensification and specifically directs that encouraging intensification primarily in the urban centres. In particular, paragraphs a, e, and i, are relative to this development.

The strategic approach to intensification intends to retain small town character and revitalize downtown areas which includes:

- a) supporting increased densities in newly developing greenfield areas with a broader mix of housing types than has been the norm in small towns;
- e) encouraging modest intensification in stable residential areas respecting the character of the area. Stable residential areas are considered to be established areas generally consisting of predominantly low-density housing on local roads with the built boundary;
- i) encouraging the development of appropriate standards for residential intensification, redevelopment and new residential development which are cost effective, environmentally sound and compatible with existing uses, small town scale and character.

The proposed townhouse development will help achieve the policy direction of the official plan to provide a range of housing option and is of a density that achieves a modest intensification within a stable neighbourhood, while respecting the low to medium density character of the area. The use of the subject lands for townhouses will make more efficient use of existing services without compromising the small-town feel.

Residential Policy D.2.1 states that the single-detached home is currently the dominant housing type in the urban centres and this situation is expected to continue. However, new housing types are needed to provide a greater variety of residential accommodation as well as a more affordable housing supply. The Municipal Plan anticipates that semi-detached, townhouse and apartment dwellings will be developed to respond to this need and that these units may eventually account for at least one quarter of all housing units in Fergus and Elora-Salem where full municipal services are available.

The following paragraphs in policy D.2.2 are of particular relevance for the subject lands:

- 2. To provide a variety of dwelling types to satisfy a broad range of residential requirements including affordable housing;
- 7. To encourage intensification, development proposals provided they maintain the stability and character of existing neighbourhoods;

In conformity with the above policies, the development of the subject lands will help achieve the objective of provision of a broad range of residential uses by providing townhouses as an alternative option to the single detached residential built form housing. To reiterate earlier statements within the report, this development provides for modest intensification of the subject lands while maintaining the established character of the area.

Policy D.2.5 provided direction for Medium Density development and states that Multiple residential developments such as townhouses and apartments may be allowed in areas designated RESIDENTIAL subject to the requirements of the Zoning By-law and further provided that the following criteria are satisfactorily met:

1. That medium density development on full municipal services should not exceed 35 units per hectare (14 units per acre) for townhouses or row houses.
2. That the design of the proposed height, setbacks, landscaping and vehicular circulation, will ensure that it will be compatible with existing or future development on adjacent properties;
3. That the site of the proposed development has a suitable area and shape to provide:
 - a) Adequate on-site landscaping to screen outdoor amenity areas both on the site and on adjoining property, to buffer adjacent residential areas and to improve the overall appearance of the development;
 - b) On-site amenity areas for the occupants of the residential units;
 - c) Adequate off-street parking, access and appropriate circulation for vehicular traffic, particularly emergency vehicles; and
 - d) Adequate grading to ensure that drainage from the property is directed to public storm drainage facilities and not to adjoining properties. That adequate services such as water, sewage disposal, storm water, roads and hydro are available or shall be made available to service the development;
7. That a separate zone(s) is established for multiple residential developments.

The townhouse development is proposed for full municipal services, will provide for sufficiently sized rear yards for each street fronting townhouse unit and will be designed to be two storeys in height, thereby not exceeding the maximum height of three storeys. The overall density of the area conforms with the 35 units per hectare. The onsite density is slightly elevated to 39 units per hectare, however as the density is generally measured across an area, which in this case is predominantly developed with lower-density built forms such as single and semi-detached units. This slightly more densely developed lot continues to provide a low-density built form housing option that is under three storeys and is consistent with development in the area and meeting the overall intent of the official plan, therefore an amendment to the plan has not been contemplated.

Each unit will have its own garage for parking and in addition, the driveways are long and wide enough to provide for at least two parking spaces in the driveway yielding a total of 12 parking spaces. The sites will be graded to ensure that drainage is directed to the storm sewer in the road, away from any adjacent properties. A zoning by-law amendment forms part of the applications to the

There are two existing lots comprising this development. 65 and 69 Bridge Street were both created by a previous consent in 2024. The current owners wish to develop the lands with 4 street fronting townhouse units each on their own lot. Therefore, further consent is required to sever 65 Bridge and 69 Bridge respectively into two lots for a total of 4 lots. Each new lot will contain a townhouse unit it that could be developed with an additional dwelling unit if the purchaser wishes. In that regard a total of 12 parking spaces including the garage spaces (4) and 8 spaces in the driveways have been provided to accommodate the proposed development of the lands. The lots conform or exceed the majority of the regulations as noted above, but will be rezoned to permit the townhouse use to an R3 zone with a special regulation addressing the need for zero lot line between the townhouse units as they straddle two existing lots and are not on a plan of subdivision. See the attached survey sketch provided.

Planning analysis

The subject lands are situated within the urban area-built boundary, resulting in the protection of natural and agricultural areas from development impacts. The subject lands will make more efficient use of infrastructure such a sewage, water, transportation and will result in the orderly development of the lands, as they are located within the settlement area which is the focus for development with existing services that can accommodate this modest intensification. Making better use of infrastructure and existing services can help reduce the greenhouse gas emissions. The dimensions and proposed shapes of the four proposed lots are appropriate to accommodate this development. The subject lands are located in the built-up area, which has adequate existing services, utilities, roads, schools and soft infrastructure to support this development. Therefore, the proposed development has regard for the Planning Act.

The subject lands are ideally situated within a neighbourhood that provides a mix of land uses through modest intensification that will contribute toward the Township's provision of a housing supply for 15 years. In addition, the townhouse development will contribute towards the creation of a complete community with a range and mix of housing options that can appeal to a broader demographic. The subject lands are located within the Village of Elora Settlement area which is the focus area for growth and development.

This development is consistent with the PPS Policies 2.1, 2.2, 2.3 and 2.5 which state that settlement areas both urban and rural shall be the focus for growth and development and it is of a scale that is appropriate for the area and can be accommodated with existing services, while providing an additional housing option for Elora residents.

Similarly, the County of Wellington Official Plan and the Township of Centre Wellington Official Plan direct development to urban centres where infrastructure is available and encourages the development of a variety of housing forms and densities that are consistent with the small-town character of the urban centres such as Elora. The modest intensification of the subject lands conforms to both the County and Township Official Plans and is of a scale that maintains the overall character and scale of the established community while providing a housing choice that may appeal to a broader demographic group.

The proposed zoning by-law amendment would rezone the lands to R3 which would permit the townhouse with an additional dwelling unit in the basement. The townhouse use is not currently

permitted in the R1-A zone. In addition, the relief being sought through the site-specific zoning by-law amendment includes a zero lot line for the common property line between 65 and 69 Bridge street as well as a slight increase in density from 35 to 39 units per hectares.

The rezoning of the lands to an R3 zone would permit a modest intensification of the subject lands to allow the townhouse use which is also a low-rise built form option of less than 3 storeys and is therefore compatible with the low-rise residential neighbourhood. Each townhouse unit has been designed to provide for an additional dwelling unit, therefore providing additional housing choice in the community. The relief for a slight increase in the density is resulting from the smaller lot configurations required for the townhouse use rather than what would be typical for a single detached use, but would likely be negligible from the streetscape. It is important to note that all 4 lots comply with the minimum lot frontage and area requirements of the R3 zone. All proposed lots comply to the required setbacks as well. The lots are slightly irregular in shape, which also contributes towards the slight density increase. Despite the irregular shape of the lots, the shifting of the townhouse units further from the front lot line enabled the accommodation of on-site tandem parking for a total of 12 parking spaces rather than the 4 that are required (including the space in the attached garage). The additional parking provided will facilitate the inclusion of an additional dwelling unit (ADU), should the future owners wish to incorporate an ADU in their townhouse. The Official Plan allows for flexibility concerning qualitative figures within the Plan provided the spirit and intent of the plan is being maintained. The intent of the plan to provide housing options and choice that are under 3 storeys is being maintained.

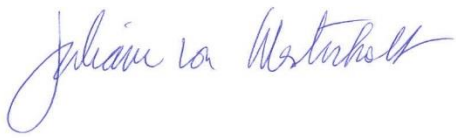
Summary/conclusion

The development of the subject lands has regard for matters of provincial interest as referred to in Section 2 of the Planning Act, is consistent with the Provincial Planning Statement and conforms to both the County and Township Official Plans. The Zoning relief requested is minor and resultant largely due to the irregular shape of the lots. Therefore, the lands are suitable for the proposed townhouse development, will provide for alternate built form housing option that is under three storeys and have been designed for the inclusion of additional dwelling units. The proposed development represents good planning that is compatible with surrounding land uses.

Enclosed for your consideration are the completed application form, a survey sketch, elevations, pre-consultation record, source water protection forms, site grading, Functional Servicing Report, SWM Report, Planning Justification Letter, Geotechnical Report and Tree Management Report/Plan. The application fee of \$8,634.00 has also been sent together with a hard copy of the signed application via mail and a scanned image of cheque has been enclosed. Kindly advise us when the applications have been received. Should you have any questions, please do not hesitate to contact me directly.

Yours truly,

MHBC



Juliane vonWesterholt, BES, MCIP, RPP
Associate

cc. F. Kamali Siddiqui
M. Tahir