ATTACHMENT C

	Date Received	Agency Commenting Authority	Township Response
		Provincial Government	
1	May 11th, 2026	The Ministry of Citizenship and Multiculturalism(MCM) recommends that OP Poliy 1.2 (Engagement with Indigenous peoples) be revised to be consistent with PPS 2024, 4.6.2. -- Specifically, the rewriting goes as follows: Engaging with Indigenous communities considers their interests when identifying, protecting and managing cultural heritage ~~and archaeological~~ resources. [or cultural heritage resources, including archaeological resources OR archaeological resources, **built heritage resources and cultural heritage landscapes].**	Addressed, with the exception of cultural heritage landscapes as the Township does not have any, nor an intent to designate any.
2	May 11th, 2026	The MCM recommends that OP policy 6.1 be revised to be consistent with terminology in the OHA and PPS 2024. MCM recommends that the undefined term "historic buildings" be replaced with the terms: "built heritage resources," and "properties on the Municipal Register."-- Façade designs are encouraged to reference the articulation of neighbouring ~~historic buildings~~ **adjacent or nearby built heritage resources and properties identified on the Municipal Heritage Register**, where applicable, with respect to vertical and horizontal elements. Further, new buildings are encouraged to relate to the traditional building stock, either through a traditional style that reflects the character of the area, or a more contemporary style that sets them apart from and highlights heritage ~~buildings~~ **properties** through a defined contrast and juxtaposition.	Addressed
3	May 11th, 2026	From MMAH: According to the Building Code Act, municipalities cannot create standards for the construction of buildings. This includes mandating any standards for the purpose of passive or active solar gain, that go beyond the minimum standards outlined in the Building Code. A revision is proposed to the right. -- New Neighbourhoods are the currently undeveloped portions of the Urban Areas that are expected to accommodate new residential communities over the 2051 planning horizon of this Plan. Within these new communities the following urban design policies apply: (h) Orient streets and **encourage developers to orient** buildings to maximize the potential for passive and active solar energy	Addressed

4	May 11th, 2026	MCM also wants revisions to policy OP 6.4 to clarify that the Municipal Heritage Committee and the Municipal Heritage Register are distinct mechanisms under the Ontario Heritage Act and should be addressed through separate policies. MCM also recommends that policy 6.4 be revised to be consistent with the provisions of the Ontario Heritage Act. The listed criteria are not consistent with O. Reg 9/06 under the Ontario Heritage Act and should be removed. -- ~~Cultural Heritage Register~~ **Municipal Heritage Committee** The Township will maintain a Municipal Heritage Committee (Heritage Wilmot) under the Ontario Heritage Act to advise and assist the Township on matters related to Parts IV and V of the Act and on other matters of cultural heritage as Council may specify by by-law. **Municipal Heritage Register** The Township, in consultation with Heritage Wilmot, will determine what **properties** ~~cultural heritage~~ resources should be included on the Heritage Register, **where they are determined to have cultural heritage value or interest found in O. Reg 9/06 under the OHA**. ~~In order to be included on the Heritage Register, a cultural heritage resources must satisfy at least two of the criteria from O.Reg 9/06 of the Ontario Heritage Act, ,which includes the following criteria:~~ **Non-designated properties that Council believes to be of cultural heritage value or interest may also be included on the municipal heritage register, in accordance with relevant provisions of the OHA.** ~~1. Properties that are designated under the Ontario Heritage Act.~~ ~~2. Properties that are protected by a heritage easement or covenant under the Ontario Heritage Act.~~ ~~3. Properties that are identified by the Grand River Conservation Authority or in Regional, provincial or federal heritage inventories.~~ ~~4. Non-designated properties that have been identified as having cultural heritage value or interest..~~	Addressed

5	May 11th, 2026	MCM notes that Heritage Impact Assessments (HIAs) are undertaken to address built heritage resources and/or cultural heritage landscapes, but not archaeological resources, i.e., it does not address of three types of cultural heritage resource. Therefore, policy 6.4 be revised to align the technical study with the type of cultural heritage resource it will assess. Consistent with the PPS definition, we also recommend that the term 'protected heritage property be used rather than being limited to designated or listed properties. This includes properties subject to heritage conservation easements, and provincial, federal or UNESCO heritage recognitions. MCM further notes that archaeological resources are addressed through archaeological assessments (AAs), not HIAs, and should be treated separately. It is also recommended that this policy be revised to clearly apply to infrastructure and public works projects, as such projects may impact cultural heritage resources and may trigger the need for technical cultural heritage studies. The terms "No negative impact" and "protected cultural heritage resources property" are not consistent with the terminology of the PPS and should be deleted from this section. -- ~~Cultural~~ Heritage Impact Assessment (e) A Cultural Heritage Impact Assessment shall be prepared where development or site alteration, **including infrastructure works,** has the potential to impact a ~~cultural~~ **built** heritage resource and/or **cultural heritage landscapes**, in accordance with PPS 2024. The Township will require the submission of a ~~Cultural~~ Heritage Impact Assessment as part of a complete development application where such application includes, or is adjacent to an identified **built heritage resource and/or cultural heritage landscape** or **a** ~~designated~~ **protected heritage property**, ~~an identified or designated cultural heritage resource.~~ A ~~Cultural~~ Heritage Impact Assessment **and/or Conservation Plan** may also be required [..] (f) A **Cultural** Heritage Impact Assessment shall be conducted by a qualified professional and demonstrate how the **cultural** heritage value**s** or interest, heritage attributes, and	Addressed

6	May 11th, 2026	MCM notes that Heritage Impact Assessments (HIAs) are undertaken to address built heritage resources and/or cultural heritage landscapes, but not archaeological resources, i.e., it does not address of three types of cultural heritage resource. Therefore, policy **6.4** should be re-assessed evised to align the technical study with the type of cultural heritage resource it will assess. Consistent with the PPS Section 8 definition, they also recommend that the term 'protected heritage property' be used rather than being limited to designated or listed properties. This includes properties subject to heritage conservation easements, and provincial, federal or UNESCO heritage recognitions. -- ~~Cultural~~ Heritage Impact Assessment (e) A Cultural Heritage Impact Assessment shall be prepared where development or site alteration, **including infrastructure works,** has the potential to impact a ~~cultural~~ **built** heritage resource and/or **cultural heritage landscapes**, in accordance with PPS 2024. The Township will require the submission of a ~~Cultural~~ Heritage Impact Assessment as part of a complete development application where such application includes, or is adjacent to an identified **built heritage resource and/or cultural heritage landscape** or **a** ~~designated~~ **protected heritage property**, ~~an identified or designated cultural heritage resource.~~ A ~~Cultural~~ Heritage Impact Assessment **and/or Conservation Plan** may also be required [..] (f) A **Cultural** Heritage Impact Assessment shall be conducted by a qualified professional and demonstrate how the **cultural** heritage value**s** or interest, heritage attributes, and integrity of the ~~resource~~ property are to be conserved and **to identify** how any impacts to heritage attributes can be mitigated. It is the intent of the Township to conserve, enhance, and support the reuse of cultural heritage resources in their original location, wherever possible. ~~No Negative Impact~~ (h) In considering public works,	Addressed
7	May 11th, 2026	MCM reccomends that OP policy 6.4 be revised for consistency with PPS 2024, Section 4.6.1, which applies to protected heritage properties, rather than limiting the policy to "designated" resources. Clarifying this terminology will align the policy with provincial definitions and capture the full range of protected heritage properties under the Ontario Heritage Act or under other jurisdictions.-- Adaptive Reuse i) This Plan supports the conservation, restoration, and adaptive reuse of identified or ~~designated cultural heritage resources~~ **protected heritage properties** which can also include adding compatible and contemporary additions	Addressed

8	May 11th, 2026	MCM wants policy 6.4 about archaeological resources and determining archaeological potential revised for consistency with the PPS, 2024. It is also recommended that this policy be revised to clearly apply to infrastructure and public works projects, as such projects may impact archaeological resources and may trigger the need for archaeological assessments. Please note that the term “Heritage Conservation Plan” for archaeological resources is not standard under the Ontario Heritage Act archaeological framework process. MCM recommends the following be added to this section: ARCHAEOLOGICAL RESOURCES j) ~~Archaeological resources may occur on, or below, the modern land surface or the surface of a water body. These sites may contain scatters of artifacts, the remains of structures, cultural deposits, or subsurface strata of human origin. To protect archaeological sites:~~ **Council recognizes that there may be (terrestrial and/or marine) archaeological sites or areas of archaeological potential within the boundaries of the municipality.** 1. **Development and site alteration, including infrastructure works by the Township, will be permitted on lands containing archaeological resources or areas of archaeological potential only where the archaeological resources have been assessed, documented, and conserved**. In any area containing archaeological resources or areas of archaeological potential, the Township will require the submission of an Archaeological Assessment [..]	Addressed.
9	May 11th, 2026	2. Archaeological Assessments must be prepared by a licensed archaeologist in accordance with the Ontario Heritage Act and applicable provincial standards and guidelines to the satisfaction of the Township and the Province and shall include a Heritage Conservation Plan when archaeological resources are identified in the Assessment. All Archaeological Assessments shall be provided to the Province in accordance with Provincial requirements. Where development or site alteration may affect archaeological resources or areas of archaeological potential, the Township may require an archaeological assessment, along with any subsequent correspondence or documentation regarding Provincial review and acceptance	Addressed.

10	May 11th, 2026	MCM recommends that a policy be added as a separate section in Policy 6.4 Planning for Culture to address policies for cemeteries and burials. (PPS 4.6.1, 4.6.2, 4.6.3). MCM recommends adding the following as a separate section: -- **Cemeteries and Burials** **x) Where development has the potential to impact a known or suspected cemetery or burial site, the Township shall require an archaeological assessment by a licensed archaeologist. Provisions under both the Ontario Heritage Act and Funeral, Burial and Cremation Services Act shall apply. Development shall be guided by this legislation and any direction from the Ministry of Public and Business Service Delivery and Procurement**	Addressed.
11	May 11th, 2026	Policy n) #5 of OP policy 7.6 should reference and align with regulatory requirements and guidelines under the Aggregate Resources Act Cultural shall be conserved which may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment and/or heritage impact assessment. (PPS 4.6.1, 4.6.2,4.6.3 and Section 8 (definition of "conserved")) -- MCM recommends the following revisions: Required Technical Information n) 5. **technical cultural heritage studies (e.g.**, an archaeological assessment, and/or Cultural Heritage Impact Assessment) in accordance with the policies of this Plan **and the Aggregate Resources Act;**	Addressed.
12	May 11th, 2026	MCM notes that Section 1.3 of the OP indicates that "for the purpose of interpreting this Plan, the definitions in the Planning Act, the Ontario Heritage Act, the Provincial Planning Statement (2024), and other applicable Provincial legislation, as well as local plans and guidelines, including the Township of Wilmot Zoning By-law shall apply." MCM notes that there is inconsistency which terms have been included in the glossary. Not all definitions from the PPS need to be included in the official plan. However, MCM recommends that if there is desire to include terms defined in the PPS please include the ones related to cultural heritage that are missing: adjacent lands, conserved, protected heritage property, and significant. (PPS Section 8 Definition of "protected heritage property", "significant") _ MCM recommends that the following definitions be added to the glossary:	Addressed.

13	May 11th, 2026	**Adjacent lands means, for the purposes of policy 4.6.3, those lands contiguous to a protected heritage property or as otherwise defined in the municipal official plan.** **Conserved means the identification, protection, management, and use of cultural heritage resources in a manner that ensures their cultural heritage value or interest is retained. This may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted or adopted by the relevant planning authority and/or decision-maker. Mitigative measures and/or alternative development approaches should be included in these plans and assessments.** **Protected Heritage Property- means property designated under Part IV or VI of the Ontario Heritage Act; property included in an area designated as a heritage conservation district under Part V of the Ontario Heritage Act; property subject to a heritage conservation easement or covenant under Part II or IV of the Ontario Heritage Act; property identified by a provincial ministry or a prescribed public body as a property having cultural heritage value or interest under the Standards and Guidelines for the Conservation of Provincial Heritage Properties; property protected under federal heritage legislation; and UNESCO World Heritage sites** **Significant means, in regard to cultural heritage and archaeology, resources that have been determined to have**	Addressed.
14	June 5, 2026	From OMAFA, The Agricultural System outlined in Township of Wilmot Draft New Official Plan conceptually limits consideration for elements of the agri-food network that are located within settlement area boundaries. OMAFA staff are available to discuss possible approaches to address this challenge. Consider how elements of the agri-food network that are located within Rural and Urban Settlement Areas are addressed/included as part of the Agricultural System approach outlined in the Official Plan. -- It is recommended that the following revision be considered for addition to policy 4.3: 4. 3 Countryside Land Use System **The Township of Wilmot will use an agricultural system approach, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.** The agricultural **land base** ~~system~~, called the Countryside in Wilmot, is shown on A1: Countryside Land Use of the Official Plan. It includes Prime Agricultural Areas and Rural Areas. These agricultural policies are intended to permanently protect these valuable areas from urban development, while providing for the continued use of the lands for agriculture, environmental and other appropriate rural uses, including appropriate access to mineral aggregate resources and other natural resources. **In support of the agri-food network, the** Township will provide opportunities to support access to healthy, local, and affordable food, urban and near-urban agriculture, food system planning and promoting the sustainability of agricultural, agri-food, and agri-product businesses while protecting agricultural resources and minimizing land use conflicts; protecting, enhancing, or supporting opportunities for infrastructure, services, and assets.	Addressed

15	June 5, 2026	From OMAFA & MMAH, It is unclear how **policy 4.4 d)** addresses the criteria outlined by PPS policy 2.3.2 regarding new and expanding settlement area boundaries. Where settlement area boundaries and/or expansions are proposed, it is expected that supportive materials would need to be prepared to demonstrate that the agricultural policy criteria in the PPS were adequately considered. An Agricultural Impact Assessment (AIA), including alternative location analysis, and MDS calculations completed to the satisfaction of the relevant approval authority are required to support this policy. Municipalities can make decisions that are not consistent with the criteria listed, if they are able to show that the criteria were considered when making decisions on proposed settlement boundary expansions. This would include providing rationale as to what extent the findings of the AIA and/or calculated setbacks have, or have not, been incorporated into the final decision, as well as a summary of the mitigation measures to help achieve compatibility. -- It is recommended that policy 4. 4 d) be modified as followed: d) The Township may consider permitting a minor expansion to a Rural Settlement Area for non-residential uses to accommodate the future needs of the Township. Any such expansions will require an amendment to this Plan in accordance with **policy 4.8 b) of this official plan and** the following criteria:	Addressed, though the policy reference was refined to avoid pointing to another policy in the document, and instead refers to the section heading for urban area expansion policies.
16	June 5, 2026	It is recommended that policy 4.8 b) be modified as followed: In identifying a new Settlement Area or allowing a settlement area boundary expansion, the Township shall consider the following through a comprehensive community planning process prior to the designation of new Settlement Areas or settlement area lands:	Addressed.
17	June 5, 2026	From OMAFA, The PPS requires that impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance. It is recommended that policy 4.3 a) be modified as followed: -- a) Within the Prime Agricultural Area and Rural Area designations, all types, sizes and intensities of agricultural uses and normal farm practices will be promoted and protected in accordance with Provincial standards. The following policies will apply with respect to the Agricultural System: 1. Where negative impacts on the agri-food network are unavoidable, they will be assessed, minimized, and mitigated to the extent feasible. Where agricultural uses and non-agricultural uses interface outside of Rural Settlement Areas, land use compatibility will be achieved by avoiding or where avoidance is not possible, minimizing and mitigating adverse impacts on the Agricultural System **from any new or expanding non-agricultural uses as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance**. Where mitigation is required, measures should be incorporated as part of the non-agricultural uses, as appropriate, within the area being developed.	Addressed.
18	June 5, 2026	From MMAH, PPS Policy 2.3.2.1 permits the identification of new settlement areas and settlement area boundary expansions (SABEs), provided that the planning authority has considered the criteria set out in the policy. The draft Official Plan policy appears to limit consideration of SABEs to the comprehensive community planning process, which may be interpreted as imposing an additional condition that is inconsistent with the PPS. -- It is recommended that policy 4.8 b) be modified as followed: In identifying a new Settlement Area or allowing a settlement area boundary expansion, the Township shall consider the following ~~through a comprehensive community planning process~~ prior to the designation of new Settlement Areas or settlement area lands:	Addressed.
19	June 5, 2026	From MMAH, PPS Policy 2.3.2.2 states that, notwithstanding Policy 2.3.2.1(b), the identification of new settlement areas requires demonstration that infrastructure and public service facilities to support development are planned or available. To address this requirement, a new subsection should be added to Draft Official Plan Section 4.8. -- It is recommended that the following be added to policy 4.8 a): c) **Notwithstanding policy 4.8 b) 2., the Township may identify a new settlement area only where it has <u>been demonstrated that the infrastructure and public service facilities to support development are planned or available</u>.**	Addressed.

20	June 5, 2026	From OMAFA, It remains unclear how the Official Plan's policies on Additional Residential Units implement and align with the PPS direction concerning additional residential units within prime agricultural areas. -- It is recommended that policy 5.3 d) be modified as follows: d) Up to 3 residential dwelling units (1 dwelling unit and 2 additional residential units) shall be permitted in all areas where residential uses are allowed in accordance with Provincial legislation and as set out in the implementing Zoning By-law to provide opportunities for a choice of housing including type, tenure, cost and location. **1. Where a residential dwelling is permitted on a lot in a prime agricultural area, up to two additional residential units shall be permitted in accordance with provincial guidance, provided that, where two additional residential units are proposed, at least one of these additional residential units is located within or attached to the principal dwelling, and any additional residential units:** **a) comply with the minimum distance separation formulae;** **b) are compatible with, and would not hinder, surrounding agricultural operations;** **c) have appropriate sewage and water services;** **d) address any public health and safety concerns;** **e) are of limited scale and are located within, attached, or in close proximity to the principal dwelling or farm building cluster; and** **f) minimize land taken out of agricultural production.** **Lots with additional residential units may only be severed in accordance with policy 10.7 j) 3.**	Addressed, though the policy reference was refined to point to severance policies in the plan, rather than create a new reference.
21	June 5, 2026	From,OMAFA, The PPS requires that prime agricultural areas be designated and protected for long-term use for agriculture. Consider that both prime agricultural land and prime agricultural area are defined terms -- It is recommended that policy 7.1 a) be modified as followed: a) The Prime Agricultural Area designation applies to those lands identified as prime agricultural **area** ~~lands~~ through Provincial mapping methodology. This designation implements the prime agricultural areas policies of the 2024 Provincial Planning Statement, covering the majority of the Township's Countryside.	Addressed.
22	June 5, 2026	From OMAFA, The PPS directs that up to two additional residential units shall be permitted in prime agricultural areas in accordance with PPS policy direction and associated provincial guidance. Consider that home occupations and home industries are not explicitly identified as permitted uses in the prime agricultural area. That being said, these uses may be considered through policy direction for agriculture-related and on-farm diversified uses. Township staff may want to consider a similar revision for policy 7.1 l). -- b) Lands within the Prime Agricultural Area designation shall be used for agricultural uses, agriculture-related uses and on-farm diversified uses. This shall include a **principal** dwelling unit **associated with an agricultural operation** (including **up to two** additional residential units as permitted under the zoning by-law **in accordance with provincial policy and related guidance)**, ~~home occupations, and home industries.~~	Modified in part, reworded to not require a dwelling on an agricultural lot, and maintained permissions for home occupations and home industries.

23	June 5, 2026	From OMAFA, Consider removing 7.1 g) 1. given it is already addressed via 7.1 j). Consider if 7.4 h) is a duplicate and could be removed given 7.1 f) addresses the requirement that new land uses comply with minimum distance separation formulae. The intent of policy 7.1 i) is unclear. Consider clarifying how this sub-policy relates to 7.1 g). Are all non-farm-related developments, agriculture-related? Policy addition suggested to address PPS policy 4.3.5.2 direction related to agricultural impact assessments for non-agricultural uses in prime agricultural areas. -- It is recommended that policy 7.1 g)- j) be modified as followed: Non-Agricultural Uses in Prime Agricultural Areas g) The Township may only permit non-agricultural uses in prime agricultural areas in conformity with the policies of this Plan for: ~~1. The extraction of minerals, petroleum resources and mineral aggregate resources.~~ ~~...~~ ~~h) New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the provincial minimum distance separation formulae.~~ i) Non-farm-related development within the Prime Agricultural Area designation will be subject to the Agriculture Related Uses policies of this Plan. j) Mineral aggregate operations may be permitted as an interim use in the Prime Agricultural Area designation in accordance with the policies in Section 7.6. **x. <u>Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided</u>, or where avoidance is not possible, <u>minimized and mitigated as determined through an</u> agricultural impact assessment or equivalent analysis, based on provincial guidance.**	Addressed.
24	June 5, 2026	From OMAFA, PPS policy 4.3.4 directs that planning authorities may only exclude land from the prime agricultural area for expansions of or identification of settlement areas. PPS 2024 policy 4.3.5 provides direction for Non-Agricultural Uses in Prime Agricultural Areas, whereby limited non-residential uses may be permitted within the prime agricultural area, subject to the criteria identified. In all cases, non-agricultural uses contemplated through PPS policy 4.3.5 would result in consideration for the additional use(s) while maintaining the prime agricultural area designation. -- ~~p) Any requests to redesignate lands from the Prime Agricultural Area designation to the Rural designation shall have adequate regard for the Agricultural Land Evaluation System methodology.~~	Policy modified to direct that the township may request redesignation and approval from the province.
25	June 5, 2026	From OMAFA, Please clarify that **7.1 q) and r)** applies only to <u>the rural lands designation</u>. It's OMAFA staff's understanding that in prime agricultural areas these uses would be considered **through** policy 7.1 g) and h), including the requirement for an agricultural impact assessment. -- The following modifications are recommended: q) **In the rural lands designation** applications to establish a Recreation and Tourism use may be permitted provided that: r) **In the rural lands designation** applications to expand the lot areas of existing Recreation and Tourism uses may be permitted, provided that:	Addressed.
26	June 5, 2026	From OMAFA, PPS 4.3.1.2 directs that prime agricultural areas shall be designated and protected for the long-term use for agriculture. -- Consider whether Policy 7.2 e) would be more appropriate for Rural Lands only, given the direction of PPS policies: Existing Non-agricultural Uses e)Within the ~~Prime Agricultural Area and~~ Rural Areas designations, minor intensification of existing industrial, commercial, recreational and/or institutional uses, including minor changes to the uses thereof, may be permitted within the limits of the existing property.	The new PPS does not recognize existing uses. This policy has remained unchanged to recognize existing uses on Prime Agricultural lands. No new uses would be established, therefore these areas will continue to be protected for the long-term use for agriculture. The new policy x. was included.

27	June 5, 2026	From OMAFA, It is unclear how the draft OP policies permitting institutional uses in the Prime Agricultural Area are consistent with PPS agricultural policies. These uses may already fall under **OP Policy 7.1** for non-agricultural uses. The OP's lot addition policies also appear inconsistent with the PPS, which does not generally permit lot creation or lot line adjustments in Prime Agricultural Areas beyond limited, specified circumstances. -- It is recommended that the following policies be revised as followed: 7.2 f) Within the ~~Prime Agricultural Area or~~ Rural Areas designations, development applications to expand the lot area for a rural institutional use, or a small-scale school, place of worship and associated cemetery established in accordance with the policies of this Plan, may be permitted provided that: 1. There is a demonstrated need for the additional land area. 2. The existing use is not a legal non-conforming use. 3. The use minimizes the amount of land removed from agricultural production. 4. The expansion does not adversely affect the ability of surrounding agricultural operations to carry out normal farm practices. 5. The severance will not result in an undersized farm that may not be commercial viable in accordance with the Farm Parcel Creation/Alteration policies of this Plan. g) Applications to establish a rural institutional use may be permitted **within the Rural Lands designation** by an amendment to the Township's Zoning By-law provided that: 1. There is a demonstrated need for the use to locate within the Rural designation. 2. The existing use is not a legal non-conforming use. 3. The use minimizes the amount of land that is removed from agricultural production. 4. The application does not adversely affect the ability of surrounding agricultural operations to carry out normal farm practices. ~~h) In the Prime Agricultural Area designation, an alternative locational analysis must also be completed in addition to Policy 7.4(y) above.~~ 10.7	Partially addressed, the intent of this policy is to permit limited expansions for rural churches and cemetaries.
28	June 5,2026	10.7 l) Within the Prime Agricultural Area and Rural Land designations, development applications to expand the lot area for a rural institutional use, or a small-scale school, place of worship and associated cemetery, may be permitted provided that: 1. The existing use is not a legal non-conforming use. 2. There is a demonstrated need for the additional land area. 3. The use minimizes the amount of land removed from agricultural production. 4. The expansion does not adversely affect the ability of surrounding agricultural operations to carry out normal farm practices. 5. The severance will not result in an undersized farm that may not be commercially viable. OMAFA staff would benefit from better understanding the context for this policy and how they relates to policy 3.7.3.2 of the in-force official plan. Additional discussion may be needed.	Partially addressed, the intent of this policy is to permit limited expansions for rural churches and cemetaries.
29	June 5, 2026	From OMAFA, Policy addition suggested to address PPS 4.1.9 and permitted uses identified by PPS 4.3.2. In the prime agricultural area, all types, sizes and intensities of agricultural uses are promoted and protected. Furthermore, the PPS outlines that the permitted uses in prime agricultural areas include: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance. It is unclear how Policy 3.3 is consistent with PPS policy direction related to permitted uses in prime agricultural areas. -- It is recommended that the following policies be added to Section 9.1 (Natural Heritage System) of the Draft Official Plan to ensure consistency with Sections 4.1.9 and 4.3.2 of the PPS: **h) Section 3 of the official plan is not intended to limit the ability of agricultural uses to continue.** **i) Where the Natural Heritage System identified on Schedule C1 overlaps with the Prime Agricultural Area identified on Schedule A1, the permitted uses are limited to those permitted in the Prime Agricultural designation.**	Addressed.

30	June 6, 2026	From MNR, The OP indicates that the Township has three Landscape Level Systems within their NHS: environmentally sensitive landscapes, significant valleys, and regional recharge areas. In additional to Landscape Level Systems in section 3.1, the Township has identified Core Environmental Features in section 3.3, significant features in section 3.5 & 3.6, and supporting environmental features in section 3.8. A number of the Landscape Level System policies require several conditions to be met for an area to be included in the category. The result is a complex policy structure that does not appear to be consistent with the natural heritage features and areas policies listed in the PPS. For example, a provincially significant wetland (PSW) is identified as a Core Environmental Feature, along with habitat of endangered and threatened species, environmentally sensitive policy areas, significant woodlands, environmentally significant valley features and significant areas of natural and scientific interest. According to the OP, development and site alteration is not permitted within Core Environmental Features, except for limited scenarios (forest, fish, wildlife management/conservation, flood erosion control, etc).	Addressed through the implementation of no negative impact policies as required by the PPS. The Regional Official Plan, recently approved in 2022 had a lot of thought put into the structure of the NHS policies.
31	June 5, 2026	PPS 4.1.4 states that there is no development or site alternation in PSWs in Ecoregions 5E, 6E, and 7E. PPS 4.1.5 states that development and site alternation is not permitted in a number of features include significant woodlands, significant valley lands, significant wildlife habitat and significant areas of natural and scientific interest, unless no negative impact can be demonstrated. As written, the Core Environmental Features section does not appear to be consistent with the PPS because it would permit development in a PSW and appears to overly restrict development within other natural heritage features and areas. Municipalities may elect to go above and beyond PPS protection only if it does not impact another provincial interest. In addition, a PSW could be included in an Environmentally Sensitive Landscape. There are 7 criteria to be met to be considered an Environmentally Sensitive Landscape, and there are accompanying policies regarding development and site alteration in these areas. Because the Core Environmental Area policies do not appear to be consistent with the PPS, it is challenging to determine if the various sets of system level policies are, or could be, consistent with the PPS. MNR recommends reviewing PPS natural heritage feature and area policies to ensure the Core Environmental Features section is consistent with the PPS. MNR also recommends reviewing the various systems levels policies to ensure that the reflect PPS policies regarding development and site alteration within various natural heritage features and areas. Finally, the section should be reviewed with consideration for provincial interests (aggregate resources and operations, agriculture, etc.) to ensure that policies for protection of natural heritage features do not conflict with other provincial interests. MNR would be happy to meet with the Township to discuss this further. -- It is recommended that Chapter 9.1 be reviewed for consistency with PPS policies.	Addressed through the implementation of no negative impact policies as required by the PPS. The Regional Official Plan, recently approved in 2022 had a lot of thought put into the structure of the NHS policies.
32	June 5, 2026	From MECP, There may be policies within this document that purport to prohibit water takings authorized by a PTTW or discharges authorized by an ECA. -- Modify the language, as applicable, to ensure the policy does not purport to prohibit water takings authorized by a Permit to Take Water (PTTW) and/or by an Environmental Compliance Approval (ECA) under the Ontario Water Resources Act (OWRA).	Addressed through adding policies that state "unless authorized under the Ontario Water Resources Act".

33	June 5, 2026	From OMAFA/MNR, PPS 4.3.1.2 requires that prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture. In contrast, PPS 4.1.3 requires that a natural heritage system be identified, but does not specify that it must be designated. Furthermore, the draft OP appears to apply PPS level protections to features and areas beyond those identified by PPS 4.1, including locally/regionally significant features and areas. Locally and regionally significant features do not receive the same level of protection as PPS 4.1 features. Prohibiting development and site alteration in the form of agricultural uses in favour of protecting locally or regionally significant features could be interpreted as inconsistent with PPS 4.3.1.1, 4.3.1.2, and 4.3.2.2. Furthermore, PPS 4.1.9 states that nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue. -- To be consistent with the PPS, it is recommended that prime agricultural areas be designated as the primary land use designation, and that the natural heritage system be identified as an **overlay** on Schedule C1 – Natural Heritage System and through applicable OP policies (e.g., "Core Environmental Features and Landscape Level Systems are identified as an overlay on Schedule C1"). It is recommended that Schedule C1 clearly delineate between features and areas identified in PPS 4.1 and locally/regionally significant features and areas Section 9.1 of the Wilmot Official Plan should also be reviewed to ensure the requirement to demonstrate no negative impacts on locally, regionally, or other significant natural heritage features and areas (i.e., those not identified by PPS 4.1) does not apply in the case of agricultural uses in prime agricultural areas.	Partially addressed. The land use designations are identified in text as overlays, and new policies added to identify that agricultural uses are not limited by locally and regionally significant features.
34	June 5, 2026	From MECP, Environmental Impact Statement is not typically required by the MECP for proposed groundwater takings. Any proposed groundwater takings exceeding 50,000 L/day require PTTW or EASR registration from the MECP. In accordance with Section 34.1 of Ontario Water Resources Act (OWRA) and MECP PTTW Technical Guidance for Category 3 Groundwater Takings, a Hydrogeological Study prepared by a Qualified Person (P.Geo or P.Eng.) must be submitted to the MECP to support all proposed new category 3 groundwater takings. The proponent is referred to the following website links for information on technical hydrogeological requirements associated with Ministry approvals: • EASR registry short-term water taking activities: Environmental Activity and Sector Registry | ontario.ca • PTTW guidance for long-term water takings: (Permits to take water |ontario.ca; Guide to Permit to take water application form | ontario.ca; Technical guidance document for hydrogeological studies in support of category 3 applications | ontario.ca). • Ministry's Guide to Applying for an Environmental Compliance Approval for requirements related to assessing risks to the natural environment, including supporting documentation and technical requirements (Part C). (https://www.ontario.ca/document/guide applying-environmental-compliance-approval-0 -- It is recommended that the following revisions be made to policy 9.1 I): Where construction of a new road, road widening or upgrading of a trunk sewer, trunk watermain, gas pipeline or electrical transmission line, wastewater treatment facility, waste management facility or groundwater taking project is proposed within or contiguous to an Environmentally Sensitive Landscape, the submission of an Environmental Impact Statement which evaluates landscape level impacts, will be required. **Any proposed groundwater takings exceeding 50,000 L/day require PTTW or EASR registration from the MECP. In accordance with Section 34.1 of Ontario Water Resources Act (OWRA) and MECP PTTW Technical Guidance for Category 3 Groundwater Takings, a Hydrogeological Study be prepared by a Qualified Person (P.Geo or P.Eng.) must be submitted to the MECP to support all proposed new category 3 groundwater takings.**	Addressed, though reference to a specific type of Qualified Person was not made, with a preference for relying on the inforce regulations for MECP.
35	June 5, 2026	From MECP, Please update OP policies to use appropriate source water protection terminology. -- Replace terminology used in the draft OP to standardized terms as per the *Clean Water Act, 2006* (e.g., WHPA, IPZ, ICA). Regional recharge area, WPSA (Wellhead Protection Sensitivity Area), WHAP, and High Microbial Risk Management Zones are not appropriate terms for reflecting source water protection. Additionally, update Wellhead Protection Areas – Issue Contributing Area (WHPA – ICA) to be Issue Contributing Area (ICA).	Addressed through aligning with a new Waterloo Region policy framework released in May 2026 for Official Plans.

36	June 5, 2026	MCM recommends that this policy be revised to align with the terminology in PPS Policy 4.6.5 and 6.2.2. Terminology should be updated to include “archaeological assessments,” and the policy should be revised to align with PPS 4.6.5. The policy should be revised to reference engagement in accordance with applicable provincial legislative requirements. The policy should also be rephrased to refer to cultural heritage identification and impact assessment processes. -- It is recommended that policy 9.3 p) be revised as followed: Where development is proposed in proximity to any cultural heritage ~~attribute or resources relating to activities of the ancestors of~~ **including those of interest to** an Indigenous Community, ~~the qualified heritage experts including the licensed archaeologist shall consult with affected~~ **engagement with** Indigenous Communities **shall be undertaken** to ensure their interests are considered when identifying, conserving and managing **cultural heritage resources, including** archaeological resources, built heritage resources, and cultural heritage landscapes.	Addressed.
37	June 5, 2026	From OMAFA, Revision suggested to clarify that PPS policy 4.3.5.2, requiring an agricultural impact assessment, applies to new and expanding mineral aggregate operations. -- It is recommended that the following be added to policy 9.4 i): Development applications to expand the boundaries of the licensed area of an existing mineral aggregate operation, will be subject to all policies in this Plan applicable to new mineral aggregate operations, in addition to any requirements of the Aggregate Resources Act **and the Province.**	Addressed.
38	June 5, 2026	From MNR, **OP policy 9.4 k)** outlines rehabilitation conditions associated with expanding an existing mineral aggregate operation in Environmentally Sensitive Landscapes and appears to restrict expansion of existing operations in these areas. PPS 6.1.5 requires that official plans provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas. Municipalities may go beyond PPS policies for protection of locally significant natural heritage features provided there is no conflict with other provincial interests. PPS 4.5 requires that mineral aggregate resources be protected for long-term use and that as much of the mineral aggregate resources as is realistically possible shall be made available as close to markets as possible. PPS 4.1.5 permits development and site alternation provided the test of no negative impact is met. PPS policy 4.1.6 permits development in accordance with federal and provincial requirements. Finally, PPS policy 4.1.8 regarding adjacent lands also permits development and site alternation provided the test of no negative impact is met. Section 66 of the Aggregate Resources Act (ARA) states: “This Act, the regulations and the provisions of licenses and permits and site plans apply despite any municipal by-law, official plan or development agreement and, to the extent that a municipal by-law, official plan or development agreement deals with the same subject-matter as this Act, the regulations or the provisions of a licence or permit or a site plan, the by-law, official plan or development agreement is inoperative.” Rehabilitation is established as part of the provincial licensing process for aggregate operations, which is administered by MNR. As written, the policy and associated rehabilitation requirements are unclear and subjective, the policy could be interpreted to be inconsistent with PPS policies for protection of aggregate resources, and appear to overlap with the Province’s role for licensing under the ARA. MNR is interested in better understanding the Township’s objectives for the requirements in policy 9.4 k) and is happy to meet to discuss this policy further. -- It is recommended that OP policy 9.4 k) be reviewed and revised to ensure consistency with the PPS, and the ARA. MNR is interested in better understanding the Township’s objectives with these requirements and is happy to meet to discuss this policy further.	Addressed through implementation of PPS policy directly into the Official Plan regarding rehabilitation.

39	June 5, 2026	From OMAFA, It is recommended that Wilmot review PPS policies 4.5.4.1 and 4.5.4.2 to address direction related to extraction in prime agricultural areas. -- It is recommended that the following revisions be made to policy 9.4 l) and m): l)New mineral aggregate operations will require a site-specific amendment to the Zoning By-law, the approval of which will be subject to all applicable policies of this Plan, in addition to any requirements for a licence under the Aggregate Resources Act. m)New mineral aggregate extraction within the Prime Agricultural Area and Rural Areas designation may be permitted as an interim use, subject to the policies of this Plan, provided that **impacts to the prime agricultural areas are addressed, in accordance with PPS policy 4.3.5.2, the site will be rehabilitated back to an agricultural condition and agricultural rehabilitation is maximized. Complete rehabilitation to an agricultural condition is not required if:** **a) the depth of planned extraction makes restoration of pre-extraction agricultural capability unfeasible; and** **b) agricultural rehabilitation in remaining areas is maximized.**	Addressed.
40	June 5, 2026	From OMAFA, **Policy 9.4 n)** should be revised to address PPS policy 4.3.5.2 and 4.5.4.1. -- It is recommended that the following revisions be made to policy 9.4n): n) Development applications to permit a new mineral aggregate operation, expand an existing operation, will only be permitted where the following studies have been submitted to the satisfaction of the Township, and/or any other public agency having jurisdiction over the issue addressed by the study or that may be affected by the issue addressed by the study such as adjacent municipalities: **X. Impacts from any new or expanding mineral aggregate operation on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.**	Addressed.
41	June 5, 2026	From MNR, **OP policy 9.4. o)** notes that to prevent study duplication the Township may require a pre-consultation meeting with Grand River Conservation Authority (GRCA), the Province and the Township. MNR appreciates that the intent of this policy is to reduce duplications, however MNR does not participate in aggregate pre-consultation meetings. The requirements for site plans, technical reports and other information to support aggregate applications are publicly accessible and can be found online via the link below. Aggregate resources | ontario.ca MNR notes that additional study requirements above and beyond those noted in the aggregate application process has the potential to preclude or hinder access to aggregate resources. Finally, section 66 of the Aggregate Resources Act (ARA) states: “This Act, the regulations and the provisions of licenses and permits and site plans apply despite any municipal by-law, official plan or development agreement and, to the extent that a municipal by-law, official plan or development agreement deals with the same subject-matter as this Act, the regulations or the provisions of a licence or permit or a site plan, the by-law, official plan or development agreement is inoperative.” MNR recommends removing reference to the Province engaging in pre-consultation meetings for studies relating to aggregate applications. -- It is recommended that policy 9.4 o) be revised as follows: To avoid potential overlap among the studies required under this Plan and similar studies that may be required ~~by the Province or~~ the Grand River Conservation Authority, the Township ~~will require~~ **encourages** the applicant to participate in a pre-submission consultation meeting with each of these agencies prior to the submission of any supporting studies. The purpose of this pre-submission consultation meeting will be to identify the specific policy requirements of each of the agencies in each of the substantive areas being studied such that a single study can satisfy all of the requirements identified by the agencies.	Addressed.

42	June 5, 2026	From MNR, **OP policy 9.4.q)2. & 9.4.q)3.i)** indicate that mineral aggregate resources will not be permitted on lands designated Core Environmental Features, except in accordance with specific conditions identified by the Town. Core Environmental Features currently include features identified and protected by PPS 4.1.5. PPS 4.1.5 states that development and site alteration shall not be permitted in significant woodlands and significant valleylands in ecoregion 6E & 7E, significant wildlife habitat and significant areas of natural and scientific interest, unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological function. MNR recommends amending the policies to be consistent with the PPS. -- It is recommended that policy 9.4.q)2. be modified as follows: Within Significant Woodlands, Significant Wildlife Habitat, Environmentally Significant Valley Features and/or Significant Areas of Natural and Scientific Interest, new mineral aggregate operations may be permitted where **they can demonstrate no negative impact to the natural heritage feature or its ecological function.** ~~the features consists of habitats that can be effectively replaced or restored within a reasonable period of time, such as:~~ ~~i) Areas of crop or pasture.~~ ~~ii) Plantation.~~ ~~iii) Early successional habitat.~~ ~~iv) Areas of high disturbance.~~ ~~v) Areas of low ecological diversity with high percentage of non-native species.~~ ~~vi) Small areas of non-Provincially significant marsh or thicket wetland.~~ ~~vii) Old field meadow.~~ ~~viii) Hedgerows.~~ ~~ix) Minor areas on the perimeter of the features.~~ ~~x) Drainage swales~~ It is recommended that policy 9.4.q)3.i) be modified as follows: The proposal shall demonstrate to the satisfaction of the Township that: i)~~The portion of the Core Environmental Feature affectedby the mineral aggregate extraction will be replaced or restored within a reasonable period of time with habitat of greater extent and/or ecological value as part of the rehabilitation plans, to promote, where possible, a net ecological gain, or~~ in the case of Habitat of Endangered Species and Threatened Species, compliance with provincial and federal requirements have been achieved.	Addressed.

43	June 5, 2026	From MNR, **OP policy 9.4.q)3.ii)** states that new mineral aggregate operations will not be permitted on lands designated as Core Environmental Features except where the proposal demonstrates to the satisfaction of the Township that there will be no adverse environmental impacts to environmental features or their ecological functions for Core Environmental Features. The OP defines adverse environmental effects as follows: **Adverse Environmental Effects** as used in the mineral aggregate policies of this Plan, changes likely to arise directly or indirectly from development or site alteration within or contiguous to an element of the Natural Heritage System that result in widespread, long-term or irreversible degradation of the significant features or impairment of the natural functions of the designated area. Examples of adverse environmental impacts include but are not limited to, the following: a) fragmentation of substantial reduction in size of an element of the Natural Heritage System; b) significant increase in the perimeter-to-area ratio of an element of the Natural Heritage System; c) disruption of corridors and Environmental Linkages to other elements of the Natural Heritage System; d) substantial alteration of natural topography; e) disruption of ecological relationships among significant or representative native species; f) increased potential for human or domestic animal intrusion into relatively inaccessible areas; g) alteration of the quantity, quality, timing (hydroperiod) or direction of flow of surface water or groundwater within or contiguous to an element of the Natural Heritage System; h) alteration of the structure, functions or ecological interrelationships of a natural habitat which sustain representative community associations of populations of significant species; i) reductions in the populations or reproductive capacity of significant species; j) mortality in or removal of the predominant vegetation which provides structure to an element of the Natural Heritage System; k) erosion of soils or deposition of sediment; l) compaction or trampling of soils; m) increased potential for the introduction of invasive non-native species; n) disruption of ecological processes due to increase nocturnal artificial light levels; or, o) increases in the level and quality of noise.	Addressed.

44	June 5,2026	The current list of Core Environmental Features contains several natural heritage features and areas for which different PPS policies related to permitted development and site alteration apply. As noted above, the natural heritage section of the OP needs to be reviewed for consistency with the PPS. MNR notes that for several of the features identified, the PPS requires a test of no negative impact prior to development or site alteration. The PPS defines negative impact (in relation to natural heritage features and areas), as follows: "…degradation that threatens the health and integrity of the natural features or ecological functions for which an area is identified due to single, multiple or successive development or site alteration activities." In addition, policy 9.4 r) provides direction on new mineral aggregate operations but appears to use a different term for identifying impacts and appears to extend the no adverse environmental effects test to Environmental Linkages. A municipality may elect to go above and beyond PPS protection only where it would not impact a provincial interest. Expanding the PPS definition of negative impact and extending that test to features not identified as significant natural heritage features and areas in the PPS has the potential to preclude or hinder access to aggregate resources and mineral aggregate operations. MNR recommends reviewing and revising policy 9.4.q)3.ii), policy 9.4r), and the term "Adverse Environmental Effects" in the glossary, to ensure consistency with the PPS. In addition, MNR recommends reviewing the OP in its entirety to ensure consistent language is used regarding adverse environmental effects. It is recommended that policy 9.4.q)3.ii) be modified as follows: -- ii) There will be no adverse environmental impacts effects to the environmental features or their ecological functions and connectivity of the residual areas of the Core Environmental Feature. -- It is recommended that policy 9.4.r) be modified as follows: New mineral aggregate operations proposed contiguous to Core Environmental Features may be permitted, provided that there will be no adverse environmental impacts effects to their features or ecological functions and Environmental Linkages. Further, it is recommended that the term Adverse Environmental Effects be removed in its entirety and replaced with the PPS definition of no negative impact. Please note, the municipality will need to consider updating this language throughout their OP, including when they review their Natural Heritage System section.	Addressed.
45	June 5, 2026	From MNR, **OP policy 9.4.t)** outlines conditions associated with new mineral aggregate operations within Environmentally Sensitive Landscapes, including Township, CA, and provincial review of impact studies, a blanket no adverse environmental effect statement for various PPS natural heritage features and areas, and protections for features that go above and beyond what the PPS requires. As previously noted, the Township has included a variety of significant natural heritage features and areas under the Core Environmental Feature heading. Requirements for development and site alteration identified by the PPS differ according to features. In addition, a municipality may elect to go above and beyond PPS protections only where it would not impact another provincial interest. Including impacts to connectivity of features and identifying additional features that require a test of no adverse environmental effect has the potential to preclude or hinder access to aggregate resources. Finally, any application for a new mineral aggregate operation is required to determine the potential impacts to ground water and surface water resources and where there is the potential for impacts, and impact assessment is required to determine the significant and potential for mitigation. Section 66 of the ARA states: "This Act, the regulations and the provisions of licenses and permits and site plans apply despite any municipal by-law, official plan or development agreement and, to the extent that a municipal by-law, official plan or development agreement deals with the same subject-matter as this Act, the regulations or the provisions of a licence or permit or a site plan, the by-law, official plan or development agreement is inoperative." MNR recommends removing this policy in its entirety as these conditions can and should be addressed by ensuring OP policies for protection of natural heritage features are consistent with PPS natural heritage policies and through processes under the ARA. -- It is recommended that policy 9.4.t) be removed in its entirety.	Policy deleted.

46	June 5, 2026	From OMAFA, **Policy 9.4 w)** should be reviewed and modified, as appropriate, to ensure consistency with Policies 4.5.4.1 and 4.5.4.2 of the PPS, particularly with respect to direction related to mineral aggregate extraction within prime agricultural areas. -- It is recommended that policy 9.4 w) be modified as follows: w) Prior to the establishment of a new mineral aggregate operation, Township support for the zone change application will be subject to the following: 1. The submission and acceptance of any required studies identified in this Plan. 2. Demonstration that the proposed rehabilitation is consistent with the policies of this Plan and **applicable Provincial policies**. OMAFA staff would benefit from better understanding how the recommendations of an agricultural impact assessment will be implemented in the context of a new or expanding mineral aggregate operation.	Addressed.
47	June 5, 2026	From MNR, **OP policy 9.4.ab)** outlines permissions regarding wayside pits and quarries, portable asphalt plants and portable concrete plants. When compared with PPS policy 4.5.5.1, which also outlines permissions regarding these operations, OP policy 9.4.ab) does not appear to align. The OP policy appears to be missing part of the PPS policy that addresses development permits and also appears to exclude these operations from occurring in any Core Environmental Feature on Schedule C1. While the PPS policy does have a clause regarding features of particular environmental sensitivity, it does not say all significant natural heritage features and areas. Furthermore, PPS 4.1.5 does permit development and site alteration in certain significant natural heritage features as long as no negative impact can be demonstrated. MNR recommends revising the policy to be consistent with the PPS. -- It is recommended that policy 9.4.ab) be modified as follows: Wayside pits and quarries, portable asphalt plants and portable concrete plants for the exclusive temporary use of a public road authority operating under an approved permit will be permitted on a temporary basis in all land use designations, without amendment to this Plan, or the Zoning By-law, **or development permit under the Planning Act in all areas**, except where: 1. The use would be located within or adjacent to an area of existing development that would be incompatible with aggregate extraction and associated activities. 2. ~~The use would be located within a Core Environmental Feature as designated in Schedule C1~~. **The use would be located in areas of particular environmental sensitivity which have been determined to be incompatible with extraction and associated activities.** ~~3. The use is identified as a prohibited use by the policies of this Section.~~	Addressed.
48	June 5, 2026	From MNR, **OP policy 9.4.ae) outlines** policies for aggregate extraction below the water table in the Township and rehabilitation requirements when extraction has occurred below the water table. OP policy 9.4.ag.5) notes that where extraction has occurred below water table, rehabilitation will be in accordance with the policies of this plan. PPS policy 4.5.2.4 states that where the Aggregate Resources Act applies, only processes under the ARA shall address depth of extraction of new or existing mineral aggregate operations. As noted above, section 66 of the ARA states: “This Act, the regulations and the provisions of licenses and permits and site plans apply despite any municipal by-law, official plan or development agreement and, to the extent that a municipal by-law, official plan or development agreement deals with the same subject-matter as this Act, the regulations or the provisions of a licence or permit or a site plan, the by-law, official plan or development agreement is inoperative.” Information regarding the maximum water table, and a water report are required as part of the Aggregate Resources of Ontario: Technical Reports and Information Standards. In addition, information regarding proposed rehabilitation techniques must be identified for lands being returned to agricultural uses as part of rehabilitation. These OP policies also contemplate aggregate resource extraction in prime agricultural areas but does not appear to align with PPS section 4.5.4 which sets out policies for extraction in Prime Agricultural Areas. MNR recommends removing this section in its entirety, updating the heading to “Extraction in Prime Agricultural Areas”, incorporating PPS policies from section 4.5.4, and removing policy 9.4.ag)5 to be consistent with the PPS and ARA. -- It is recommended that the heading for policy 9.4.ae) be updated to **“Extraction in Prime Agricultural Areas”,** that the Township review the policies in this section, and remove and revise policies as appropriate to ensure consistency with PPS sections 4.5.2.4 and 4.5.4. It is recommended that policy 9.4.ag)5. be removed in its entirety.	Addressed.

49	June 5, 2026	From MNR, **OP policy 9.4.ag**)1-3 provide direction on rehabilitation requirements for mineral aggregate resource operations within the Township. When compared to the PPS 4.5.3 policies regarding rehabilitation, it appears that policy 9.4.ag)1. Is missing a reference to final rehabilitation, requirement that rehabilitation accommodate subsequent land use, information regarding the interim nature of extraction, and information about mitigating negative impact. MNR recommends revising this policy to ensure consistency with the PPS. -- It is recommended that policy 9.4.ag)1. be modified as follows: Progressive **and final** rehabilitation will be carried out ~~whenever feasible so that depleted areas are restored while extraction continues in other areas of the site.~~ **to accommodate subsequent land uses, to promote land use compatibility,** **to recognize the interim nature of extraction and to mitigate negative impacts to the extent possible.**	Addressed.
50	June 5, 2026	From MNR, It appears that the OP does not contain policies consistent with PPS policies 4.5.2.1 and 4.5.2.2 regarding protection of long-term supply of mineral aggregate resources. MNR recommends that the Township review their aggregate policy section and incorporate these PPS policies, if applicable. -- It is recommended that the Township review their mineral aggregate resources policies and add PPS 4.5.2.1 and 4.5.2.2, if applicable.	Text from both sections of the PPS was added as new policies under Conservation of Mineral Aggregate Resources.
51	June 5, 2026	From MNR/MMAH, **OP policy 9.7c)1.** Notes that development or site alteration may be permitted in hazardous lands and hazardous site where a special policy area has been approved by the Province. When compared with PPS 5.2.5, the OP policy does not appear to be complete. It appears that the OP policy is missing the trigger for joint-ministerial approval (JMA) in a SPA. MNR recommends revising the policy to include the triggers for JMA to be consistent with the PPS. -- It is recommended that the following revisions be made to policy 9.7 c)1: b) Notwithstanding the policy above, development or site alteration may be permitted in hazardous lands and hazardous sites where: 1. A special policy area has been approved by the Province. **The designation of a Special Policy Area, and any change or modification to the official plan policies, land use designations or boundaries applying to a Special Policy Area lands, must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources prior to the approval authority approving such changes or modifications.**	Addressed.
52	June 5, 2026	From OMAFA, Revision suggested to help **connect 10.7 j) sub-policies** with relevant policy criteria. In most of Ontario, to achieve the PPS criteria for new lots for agricultural uses (i.e. farm splits), OMAFA staff recommends a 40-hectare minimum farm parcel size for areas where field crop and livestock operations predominate. A 40-hectare minimum farm parcel size also provides flexibility to adapt and expand with changing markets and technology. Suggest revising heading to reflect that this section speaks to the prime agricultural area designation, and the following section speaks to the rural area designation (starting at sub-policy p)). -- Policy 10.7 j) should be modified as followed: Consent Policies for the Prime Agricultural Area ~~and Rural Designations~~ j) Lot creation in the Prime Agricultural Area and Rural designations may only be permitted for: **1**. Agricultural uses, provided that the lots are of a size appropriate for the type of agricultural use(s) common in the area and are sufficiently large to maintain flexibility for future changes in the type or size of agricultural operations. **In accordance with policy 10.7 m), n), and o).**	Addressed.

53	Friday, June 5, 2026	From OMAFA, In the prime agricultural area, the PPS only permits minor boundary adjustments that do not result in the creation of a new lot. This means that a lot adjustment cannot result in a greater number of parcels after the application is approved than existed before the application. An application to recreate two lots that had previously merged on title does not constitute correction of deeds for the purposes of the PPS. OMAFA rural planners are available to provide additional information about minor boundary adjustments in the context of PPS policy 4.3.3.2. -- It is recommended that **policy 10.7 n)** be modified as followed: n) Notwithstanding the policies above, a new farm or new lot shall not be deemed to have been created where consent is given for the following purposes: 1. Minor adjustments to lots so as to permit conformity with existing patterns of exclusive use and occupancy, or to rectify problems created by the encroachment of buildings, structures, private wells or individual wastewater treatment systems on abutting lots, provided that such adjustments do not result in the creation of any additional lot held, or capable of being held, in distinct and separate ownership pursuant to the Planning Act. 2. Minor adjustments for **legal or technical reasons** to the boundaries of two adjoining non-farm lots recognized by the Township's Zoning By-law, provided that such adjustments do not result in the creation of any additional lot held, or capable of being held, in distinct and separate ownership pursuant to the Planning Act. 3. Minor adjustment **for legal or technical reasons** to the boundaries between an adjoining farm and a non-farm lot that does not decrease the size of the **farm lot** ~~farming operation~~. 4. Acquisitions of land for infrastructure, where the need for the project has been demonstrated through an Environmental Assessment or other appropriate study and the facility or corridor cannot be accommodated through the use of easements or rights-of-way. ~~Severing from each other two or more rural lots that have unintentionally merged in title, provided the severances reflect the original lot lines.~~	Addressed.
54	Friday, June 5, 2026	From OMAFA, Agricultural policies of the PPS does not support lot creation for institutional uses in the prime agricultural area. -- Policy 10.7 q) should be modified as followed: q) **Within the Rural designation, development** applications to sever new lots for a rural institutional use, or a small-scale school, place of worship and associated cemetery, may be permitted provided that:	Addressed.
55	Friday, June 5, 2026	From OMAFA, Agricultural policies of the PPS does not support lot creation for conserving environmental features or elements of the Natural Heritage System in the prime agricultural area. -- Policy 10.7 s) should be modified as followed: Consent Policies for Natural Heritage Protection s)**Outside of the Prime Agricultural Area designation**, the creation of lots specifically for the purpose of conserving environmental features or elements of the Natural Heritage System may be permitted only where such lands are designated by this Plan and zoned to prohibit any use not related to conservation, and are covered by a conservation easement granted in favour of the Township, Region, Grand River Conservation Authority or other conservation organization.	Addressed.
56	Friday, June 5, 2026	From MNR and MMAH, **Section 11.1.1** of the OP provides guidance on the Special Policy Area (SPA) for the New Hamburg Area. The policies listed in the OP appear to align with the policies that were originally approved. However, it appears that the definitions that were part of the approval are not capture in section 11.1 or in the glossary. PPS 5.2.5a) requires that any change or modification to the official plan policies, land use designations or boundaries applying to Special Policy Area lands, must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry prior to the approval authority approving such changes or modifications. MNR recommends that the Township review the draft OP against the original SPA approval and add definitions from original SPA approval, where appropriate. -- MNR recommends that the Township review the draft OP against the original approval for the SPA for the New Hamburg Area and add definitions from original SPA approval, where appropriate.	Addressed.

57	Friday, June 5, 2026	From MECP, The term "**major facilities**" is used in outlining sensitive land use buffers in the Land Use Compatibility Policies section of the OP but is not defined. Additionally, the term "brownfield" is used within Appendix A: Glossary but is not defined. MECP recommends that the OP includes a definition of each word based on their definitions in the PPS. -- It is recommended that the following terms are defined using language from the PPS (2024): • Major Facilities: - **means facilities which may require separation from sensitive land uses, including but not limited to airports, manufacturing uses, transportation infrastructure and corridors, rail facilities, marine facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries, energy generation facilities and transmission systems, and resource extraction activities** • Brownfield Sites: - **means undeveloped or previously developed properties that may be contaminated. They are usually, but not exclusively, former industrial or commercial properties that may be underutilized, derelict or vacant**	Addressed.
58	Friday, June 5, 2026	From OMAFA, The Draft Official Plan includes **definitions** that extend beyond those contemplated by the PPS. Staff may wish to review the definitions section to ensure consistency with the PPS, confirm that all defined terms are used appropriately throughout the document, and ensure that all italicized terms are formally defined. -- It is recommended that the Township review all defined terms for consistency throughout the Official Plan to ensure that defined terms are italicized uniformly. It is further recommended that the following definitions be revised as follows: **Agricultural condition: means** **a. in regard to specialty crop areas, a condition in which substantially the same areas and same average soil capability for agriculture are restored, the same range and productivity of specialty crops common in the area can be achieved, and, where applicable, the microclimate on which the site and surrounding area may be dependent for specialty crop production will be maintained, restored or enhanced; and** **b. in regard to prime agricultural land outside of specialty crop areas, a condition in which substantially the same areas and same average soil capability for agriculture will be maintained, restored or enhanced.** **Agri-tourism uses: means those farm-related tourism uses, including limited accommodation such as a bed and breakfast, that promote the enjoyment, education or activities related to the farm operation.** ~~**Lodging House means a Residential Building within which sleeping quarters are regularly let for a consideration to more than four persons and where kitchen and other facilities are shared amongst the persons occupying the Residential Building, but shall not include hotel, motel, rest home, hospital, group home, or similar use.**~~	Addressed.

59	Friday, June 5, 2026	From MNR, **Schedule A3.1** illustrates land use in the New Hamburg Urban Area. This map illustrates the boundaries of the New Hamburg Special Policy Area. Although the boundaries of the New Hamburg Special Policy Area appear to align with the boundaries that were originally approved, the SPA on Schedule A3.1 does not appear show the hydraulic floodway boundary that is reflected in the original approval. Within the suite of SPA policies there are specific policies about what is and is not permitted within the hydraulic floodway. MNR is concerned that the removal of the hydraulic floodway from the mapping could impact the implementation of SPA policies. PPS 5.2.5 a) states any change to boundaries, policies, or land uses within the SPA requires joint ministerial approval. MNR is interested in understanding why the hydraulic floodway is not represented on Schedule A3.1 and is happy to have a discussion with the Township. Depending on the information provided, MNR may recommend that the hydraulic floodway boundary reflect the original approval.	Partially addressed. The hydraulic floodway is not included within the current Official Plan, so carying it forward is not necessary. The Provincial approval continues to apply.
60	Friday, June 5, 2026	From MNR, **Schedule C1** of the OP reflects Core Environmental Features, Environmentally Sensitive Landscapes and Significant Valleys. Within these categories are various natural heritage features. Some of the features included in these categories are identified as significant according to PPS 4.1.4 and 4.1.5, and there are different policy tests required to be applied to these features. In addition, PPS 4.1.3 states that natural heritage systems shall be identified in Ecoregions 6E & 7E. While MNR assumes the intent of mapping the various categories was to reflect the NHS, we also note that we have recommended revisions to natural heritage section of the OP to ensure consistency with PPS policies. MNR recommends mapping the NHS in its entirety as an overlay. In addition, it is recommended that all natural heritage features be mapped individually on a separate schedule from the NHS. It is further recommended that these features be reflected as an overlay, with the exception of PSWs which should be identified as a designation. -- It is recommended that the Township map their NHS in its entirety as an overlay. In addition, it is recommended that all natural heritage features be mapped individually on a separate schedule from the NHS. It is further recommended that these features be reflected as an overlay, with the exception of PSWs which should be identified as a designation. Natural heritage data layers can be obtained through the Ontario GeoHub website.	Addressed.
61		**Grand River Conservation Authority**	
62	May 1, 2026	Section 3, paragraph b) states that “[The Township shall] Regulate development ” GRCA staff suggest avoiding the word “regulate” as GRCA enforces natural hazards policies through regulation; substituting with a different word (e.g. manage, direct) or re-wording the role may be preferred.	Addressed.
63	May 1, 2026	Natural hazards are addressed in section 3.2, but GRCA regulated features are also included as “Environmentally Constrained Lands” in section 3.3. GRCA staff suggest that the Township refines sections 3.3 and 3.8 to focus on its Natural Heritage System objectives with respect to Core and Supporting Environmental Features. GRCA’s hydrologic-focused role and regulation of Provincially Significant Wetlands and Other Wetlands could be added through minor supplementary wording.	Addressed

64		GRCA staff recommend broadening Section 3.2 in a number of ways. a. A preamble should include a breakdown of hazardous lands vs. hazardous sites, the one-zone / two-zone / special policy area floodplain concepts. We recommend pulling some of the prose from the Glossary (e.g. the definitions of floodway, flood fringe) into this preamble. b. One-zone policies should borrow from the general direction in the PPS: "Development shall generally be directed to areas outside of" one-zone floodplains. GRCA also recommends providing flexibility for minor alterations / additions to existing buildings or structures, as this is something GRCA would permit under its policies. The Township could choose to define what is considered minor, or make it "as determined by the GRCA". c. The Township should consider including some more specific criteria for two-zone policy areas. This would include: i. Prohibiting development in the floodway except in accordance with section 3.2(b), paragraph 2. ii. Requiring floodproofing all new dwelling units, habitable floor space and building services (e.g. mechanical / electrical services) above the regulatory flood elevation; iii. Prohibiting basements, except for certain parking / common amenity uses in multi-residential buildings, and only if floodproofed to the regulatory flood elevation. iv. Dry access to/from the site where achievable, but no less than safe (as determined by the GRCA). GRCA staff would focus on applying safe access to dwelling units.	Addressed
65		Section 5.2.3(c) of the PPS prohibits development in "areas that would be rendered inaccessible to people and vehicles during times of flooding hazards [and] erosion hazards". This captures development activities that are not within the hazard, but the main access is affected. We recommend this is considered for any uses in section 3.2(c), and anything involving new dwelling units	Addressed
66		The New Hamburg Special Policy Area (SPA) policies are contained in Section 9. We recommend exploring any opportunity to bring it into section 3.2 (without changing the text of the policies).	This creates a mapping issue. A new section is added to 3.2 identifying 9.1 as the SPA
67		The recommend section 3.2(f) is relocated to a different appropriate section, as it is generally a natural heritage / water feature and not considered a natural hazard under the PPS.	Relocated to 3.3 e)
68		**Waterloo Region**	

69	01-May-26	Policy 2.1 – Population and Employment Forecasts Policy 2.1 specifies a growth forecast of 34,000 people and 5,000 jobs to 2051. While the population figure appears consistent, the employment forecast of 5,000 jobs is significantly lower than the 12,000 jobs allocated in Table 1 of ROP for the same period. Furthermore, this employment figure does not align with the Employment Projections and Employment Lands Need Background Report (Urban Metrics, November 2025). Figure 8 of that report suggests a range of 10,980 to 17,580 jobs to 2051. We recommend reviewing this figure to ensure consistency with the ROP and the Township's own technical background studies. Additionally, the language in this policy uses the terms “targets” and “forecasts” interchangeably. For clarity, we suggest using the term “forecasts” throughout, as it more accurately reflects the technical nature of these figures as long-range projections used for infrastructure and land-use planning, rather than as goals or minimum targets.	Addressed
70	01-May-26	Policy 2.7 – Settlement Area Expansion Policies Policy 2.7(b) outlines the criteria for reviewing future settlement area boundary expansions. While these criteria align with the Provincial Planning Statement, 2024, (PPS) we note the omission of current ROP Policy 7.B.23, which prohibits urban expansions onto lands designated as Regional Recharge Areas. This policy is intended to safeguard the vital hydrological functions of these lands, ensuring that the quality and quantity of groundwater resources are protected for the long term. Urban development typically increases impervious surfaces, such as buildings and parking lots, which reduces natural infiltration. Increased salt loading from winter maintenance also poses a significant risk to the integrity of the underlying aquifer. Given the importance of these areas to the Township’s and Region’s drinking water supplies, we recommend revising this policy to maintain the protections currently established in the ROP. Furthermore, Regional staff support maintaining the “Countryside Line” concept in the Township’s new Official Plan. As described in Policy 2.7(a), the Countryside Line is intended to provide for long-term growth management, infrastructure planning, and the development of complete communities by identifying future growth areas. While this intent is clear, the current draft lacks specific language directing future expansions to occur within this boundary. For clarity, we suggest that Policy 2.7(b) be modified to require that any future settlement area expansions, if required, be directed to lands within the Countryside Line shown on Map 1.	Addressed, but prohibition on expansion into Regional Recharge Areas exists under Regional Recharge Areas Section of the Plan.
71		Policy 3.10 – Source Water Protection Regional staff have completed a high-level review of the Source Water Protection section. We appreciate the Township’s incorporation of the draft policies provided last fall, which were developed in collaboration with City of Kitchener staff to serve as a potential template for a consistent framework across the region. Since then, Regional staff have refined these policies to simplify the framework and improve implementation. To ensure the Township’s Official Plan aligns with these updates and conforms with the Grand River Source Protection Plan, please address the following items in the next iteration:	Addressed through new Source Water policies.

		• Vulnerable Area Risk Assessment Table: References to this table as a "map" should be corrected. It should be clearly identified as a Table that outlines land uses and activities that are prohibited or require further study within specific designated vulnerable areas. • Missing Content: The Official Plan currently lacks the Source Protection Mapping, the Vulnerable Area Risk Assessment Table, and the associated Category A, B, and C land use classifications. • Terminology Updates: Ensure all outdated terminology is updated to reflect Clean Water Act standards (e.g., replacing "Wellhead Protection Sensitivity Area" with "Wellhead Protection Area"). Policy Refinements • Policy Gaps: Additional language is required to address technical study requirements in accordance with Regional guidelines, specifically regarding water takings, geothermal wells, and Records of Site Condition/Risk Assessments. • Internal Consistency: There are potential conflicts between Source Water Protection policies and other sections (e.g., stormwater management, private wells, and aggregates). We recommend adding clarifying language, such as "notwithstanding other policies in this plan..." or "subject to the Source Water Protection policies of this plan," to ensure source water protection requirements take precedence in vulnerable areas • Private Services: Policies 9.3.1 and 9.3.2, which permit private services for infill, should be subject to study requirements to ensure they do not become transport pathways or sources of contamination, particularly within Wellhead Protection Areas. • Regional Recharge Areas: The draft Regional Recharge Area policies require updating to align with the ROP and other necessary refinements. Furthermore, there is an opportunity to incorporate a “water resource system” protection framework to meet the requirements of PPS Policies 4.2(c) and (d).	
72	01-May-26	Regional staff welcome the opportunity to discuss these updates and assist with this	Missing content is addressed in Appendix D. Wellhead Protection Sensitivity Area is not found in the document.
73	01-May-26	Policy Gaps: Additional language is required to address technical study requirements in accordance with Regional guidelines, specifically regarding water takings, geothermal wells, and Records of Site Condition/Risk Assessments	Contained in Appendix D
74	01-May-26	• Internal Consistency: There are potential conflicts between Source Water Protection policies and other sections (e.g., stormwater management, private wells, and aggregates). We recommend adding clarifying language, such as "notwithstanding other policies in this plan..." or "subject to the Source Water Protection policies of this plan," to ensure source water protection requirements take precedence in vulnerable areas.	Addressed
75	01-May-26	• Private Services: Policies 9.3.1 and 9.3.2, which permit private services for infill, should be subject to study requirements to ensure they do not become transport pathways or sources of contamination, particularly within Wellhead Protection Areas.	Previous policies being carried forward. Addressed.

76	01-May-26	Regional Recharge Areas: The draft Regional Recharge Area policies require updating to align with the ROP and other necessary refinements. Furthermore, there is an opportunity to incorporate a “water resource system” protection framework to meet the requirements of PPS Policies 4.2(c) and (d).	Regional Recharge Area Policies existed in 3.1 Landscape Level Systems, and have been moved to 3.10. Water Resource System Policies have been incorporated into this section and 3.9.
77	01-May-26	Policy 5.1 - Road Hierarchy Policy 5.1(b) currently requires development applications impacting Regional Roads to comply with the “appropriate Regional policies and regulations." While we support the intent of this policy, we recommend the following two refinements to provide greater clarity and better reflect the Region’s responsibilities: 1. Describe the Planned Function of Regional Roads To provide consistency with the descriptions provided for Township roads in subsection (c), we suggest adding language that defines the planned function of Regional Roads. This addition will provide necessary context to applicants and staff during the development approval process. Specifically, we recommend incorporating the following themes: • Regional Role: The Region of Waterloo is responsible for the planning, design, construction, and maintenance of the Regional Road network. This includes managing safety and traffic flow through signals, signage, and pavement markings, as well as supporting active transportation and infrastructure improvements. • Planned Function: Regional Roads are planned as safe, accessible, multimodal corridors that connect communities and accommodate various modes of travel, including walking, cycling, transit, automobiles, and heavy trucks. As arterial corridors, they often feature access controls to facilitate the efficient movement of people and goods between local streets, Provincial highways, and major employment areas. To balance mobility and local needs, the Region employs a context-sensitive design approach. This classifies roads based on their urban or rural context and prioritizes either placemaking or mobility depending on surrounding land uses.	Addressed
78	01-May-26	2. Update Policy Language for Clarity The current wording in subsection (b) refers to “appropriate Regional policies and regulations.” Because the ROP is being repealed following the approval of the Township’s new Official Plan, this reference should be updated to avoid confusion. This ensures development applications are evaluated against the full suite of Township policies, as well as the specific technical requirements found in the Regional By-laws and Guidelines. For clarity, we request the following revision to Policy 5.1(b): “All development applications that potentially impact an existing or proposed Regional Road will be subject to the relevant policies of this Plan, as well as the requirements of applicable Regional By-laws and Guidelines.”	Addressed

79	01-May-26	Policy 5.2 - Road Widths Policy 5.2(c) currently requires development to be "consistent with" the Regional Transportation Master Plan (2018). This Plan is currently being updated and will be renamed the Integrated Mobility Plan (IMP). The IMP will establish a long-term strategic framework for the Regional transportation network over the next 25 years. It will focus on creating a safer, multimodal system that prioritizes active transportation and transit while supporting the efficient movement of goods. Because the IMP functions as a high-level strategic document rather than a development control tool, requiring development applications to be "consistent with" it is technically inaccurate. Instead, the Official Plan should ensure that development support the IMP's strategic goals, such as prioritizing active, enhancing public spaces, and supporting the planned infrastructure identified within the IMP. To address this, we recommend the following revision: "Development applications and site plans shall be coordinated with and support the objectives and planned infrastructure of the Region's Integrated Mobility Plan (IMP) and any future Township of Wilmot Transportation Master Plan."		Incorporated
80	01-May-26	Policy 5.7 – Active Transportation and Complete Streets Policy 5.7(e) currently references the "Walk Cycle Waterloo Region Active Transportation Master Plan." While we support the policy's intent, please note that the Region is moving away from standalone master plans for individual transportation modes. Active transportation policy and infrastructure are now being consolidated into the Region's IMP noted above, which will succeed the previous Regional Transportation Master Plan. We recommend updating this and any other relevant references throughout the Official Plan to reflect the new integrated framework. Additionally, Policy 5.7(b) and Policy 5.7(d)(2) include provisions for promoting road safety for all users. To further strengthen these policies, we suggest expanding the list of identified safety measures to include a broader range of proven traffic-calming and infrastructure enhancements. Providing a more comprehensive toolkit will ensure the Township is equipped to improve safety across all modes of travel as development occurs. Specifically, we suggest incorporating the following measures into the policy language: • Raised crossings raised intersections • Pedestrian refuge islands 5314543 Page 7 of 12 • Tactile road surfaces for enhanced accessibility • Physically separated micromobility infrastructure • Modal filters, and • Street trees to provide natural traffic calming and improved pedestrian comfort		Incorporated

81	01-May-26	Policy 5.8 - Transportation Impact Studies Policy 5.8(a) currently implies that a Transportation Impact Study (TIS) involving a Regional Road must be completed only the satisfaction of the Township. As Regional Roads are under the jurisdiction of the Region of Waterloo, the Region must be the authority that determines the study scope or any required mitigation or infrastructure improvements. We recommend language that recognizes the Region's role in approving transportation studies that impact Regional Road corridors. The second part of this policy refers only to the "Township's road system" regarding land for road widenings and other road improvements. To protect the planned function of the Regional Road network, including future widenings, intersection improvements, and active transportation facilities, this policy should also include Regional Roads. This ensures the Township has the clear authority to secure dedications for both the Township and Regional Road networks. In addition, the PPS and the current ROP Policy 5.A25 require transportation systems to be integrated and support multimodal travel. The TIS policies in the draft Official Plan seem to focus primarily on traffic. To address this, we recommend broadening the scope of the TIS to require that, in addition to assessing private vehicle impacts, the study examine ways to encourage alternative forms of transportation such as walking, cycling and transit, and recommends necessary improvements to support a multimodal network.	Addressed.
82	01-May-26	Specifically, we recommend the following revisions to draft Policy 5.8: a) Where a development application or site plan is likely to generate significant traffic volumes on a Township or Regional Road, or where the application proposes the creation of new Township Roads, the applicant will be required to submit a Transportation Impact Study (TIS). If an application impacts a Regional Road, the study shall be prepared to the satisfaction of the Region of Waterloo. Based on the results of the TIS, the applicant may be required to dedicate land for road widenings and undertake other road improvements to mitigate the impacts of the proposed development on the Township's and/or the Region's transportation system. In addition to assessing the impact of private vehicles, a Transportation Impact Study will examine ways to encourage alternative modes of transportation, including walking, cycling, and transit, and recommend necessary improvements to support a multimodal network. b) No change 5314543 Page 8 of 12 c) Where a development application is affected by road improvements which are subject to an Environmental Assessment (EA), the EA will be completed to the extent required before approval of the development application by the Township. The Township will coordinate with the Region on any Environmental Assessments involving Regional Road corridors.	Incorporated

83	01-May-26	Policy 7.1 – Future Development Designation Subsection (s) of this policy states that the Future Development designation applies to lands “within the Countryside Line that are within the Baden or New Hamburg Urban Areas, but for which a comprehensive planning process through an Official Plan amendment is required to be undertaken prior to development of these new neighbourhoods”. While we support this approach to facilitate infrastructure planning, the phrase “within the Countryside Line” is redundant in this context. This is because the Future Development designation applies to lands already within the established settlement area but require further planning before development can occur. For clarity, we recommend deleting this phrase to simplify the policy and avoid potential confusion regarding “future development” lands within the Countryside Line that are not currently designated for growth (as discussed in our comment on Policy 2.7)	Incorporated
84	01-May-26	Policy 8.13 (a) states the Township may require the submission of any number of the reports or studies including, but not limited to those listed in this Plan, “at the sole discretion of the Township”. We support the intent of this policy to facilitate a streamlined and efficient planning approval process. To ensure this process remains seamless for applicants, we recommend refining the language to recognize the Region’s specific core responsibilities in the development review process, allowing Regional services and mandates to be addressed early in the planning process. Specifically, we suggest the following refinements to the Official Plan: 1) Incorporate the Township’s current practice of circulating pre-submission materials to the Region for early review when applications involve Regional service areas or interests. 2) Require the submission of studies or information identified by the Region during pre□consultation as a prerequisite for a “complete application”. As noted in Polic 8.13(b), this facilitates the early identification of Regional requirements to allows for more accurate submissions and faster processing timelines. 3) Include language to consult with the Region, as appropriate, to confirm that all applicable Regional conditions have been satisfied prior to final approval. This ensures the Township’s decisions are supported by necessary technical clearances.	Incorporated
85	01-May-26	5314543 Page 9 of 12 4) Where the Township initiates a peer review involving Regional service areas (e.g., hydrogeology or transportation modeling), we suggest a collaborative approach. This ensures the review satisfies the requirements and legislative mandates of both municipalities simultaneously, avoiding duplication or conflicting comments. Additionally, we note that Policy 8.13(c) refers to a “Potential Studies That May be Required Table” to guide applicants. However, this table appears to be missing from the current draft. We recommend including this table in the next iteration of the Official Plan and welcome the opportunity to collaborate on its contents. This will ensure that any studies required to address Regional mandates are clearly identified, providing greater certainty for applicants and ensuring all necessary technical requirements are met early in the process.	Incorporated

86	01-May-26	Policy 8.14 Public Meetings and Notification We support the intent of Policy 8.14 to facilitate robust consultation in accordance with the Planning Act requirements. To facilitate continued collaboration, we suggest enhancing this policy to explicitly reference coordination with the Region on matters that intersect with Regional service areas and legislative mandates. This includes essential interests such as transit, source water protection, water and wastewater servicing, Regional Road corridors, and other matters. While we recognize the Township's discretion regarding notification procedures, identifying the Region as a key agency partner within these policies would help ensure that planning and infrastructure decisions remain aligned across both levels of government. This collaborative approach supports our common goal of providing integrated land use planning with the delivery of key Regional services while maintaining prescribed review timeframes under the Planning Act.	Required under the Planning Act.
87	01-May-26	Appendix A – Glossary The draft Official Plan includes several specific terms that are defined in Appendix A (Glossary). However, we note that these terms are not formatted (such as through bolding or italics) within the main body of the document. This lack of distinction makes it difficult for the reader to identify which terms have specific, technical meanings versus their common usage. For clarity and to facilitate effective policy implementation, we recommend that all terms defined in the Glossary be consistently bolded or italicized throughout the document. This formatting convention ensures that applicants, staff, and the public can easily reference the intended definitions, which is essential for the accurate interpretation of the Official Plan's policies	Addressed

88	01-May-26	1. Coordination with the Region, Adjacent Municipalities, and Other Agencies Policies 6.2.1, 6.2.9, and 6.2.10 of the PPS establish the framework for inter-municipal cooperation and long-term coordination on planning matters and growth management. Specifically, Policy 6.2.1 directs planning authorities to adopt a “coordinated, integrated, and comprehensive approach” when dealing with planning matters that cross municipal boundaries. Coordination with adjacent municipalities, agencies, boards, Service Managers and upper-tier municipalities is essential for effective growth management, economic development, and the protection of natural and cultural heritage resources. It is also critical for the delivery of affordable housing and essential Regional infrastructure, including water and wastewater systems, transit, Regional Roads, and other services. Furthermore, PPS Policies 6.2.9 and 6.2.10 outline specific provisions for coordination between adjacent planning authorities and other agencies in cases where the upper-tier municipality, such as the Region of Waterloo, no longer holds planning authority under the Planning Act. These policies are intended to ensure that growth is managed consistently across jurisdictional boundaries. This is achieved through shared responsibility for establishing and maintaining population and employment projections, density targets, strategic growth areas, and other planning matters. While the current draft Official Plan generally includes policy direction to coordinate with the Region on water and wastewater infrastructure planning, we recommend strengthening these provisions to fully align with the PPS. To ensure the Township’s Official Plan continues to support the planning and delivery of key Regional services, we suggest adding two new policies within Section 8 (Implementation Tools), or another appropriate section:	Addressed.
89	01-May-26	1. New policy to implement PPS Policy 6.2.1: This policy should direct the Township to adopt a coordinated and integrated approach when dealing with planning matters involving the Region, adjacent municipalities, and other agencies. It should specifically reference the coordination of infrastructure and the planning matters listed in PPS Policy 6.2.1 subsections a through h, as applicable. 2. New policy to implement PPS Policy 6.2.10: This policy should ensure that the specific matters listed in PPS Policy 6.2.9, including growth allocations, the location of strategic growth areas, applicable density targets, and other matters that cross municipal boundaries, are formally addressed and coordinated with adjacent area municipalities as part of the planning process.	Partially incorporated into Section 2 Managing Population and Employment Growth.

90	01-May-26	2. Region of Waterloo International Airport The draft Official Plan currently lacks policy direction regarding the Region of Waterloo International Airport. As the Region's proposed Airport Zoning Regulations (AZR) will encompass a portion of the Township of Wilmot, it is important to include language that ensures land use compatibility and protects the long-term viability of this Regional asset. Regional staff recommend the following new policy language be incorporated into the appropriate section of the Plan: "The Township supports the long-term operation of the Region of Waterloo International Airport and recognizes its significant economic role and the services it provides to the community. The Township will prohibit any land use, activity, or structure that could interfere with airport operations, create an aviation safety hazard, or result in land use incompatibilities related to public health and safety. Furthermore, the Township will ensure that all development aligns with Transport Canada's Region of Waterloo International Airport Zoning Regulations."	Not incorporated, as the Airport is federally regulated and not significantly applicable in Wilmot's context.
91	01-May-26	3. Noise from Transportation Sources ROP Policy 2.I.2.2 currently requires a noise study to mitigate adverse impacts on sensitive land use applications located near Regional Roads, Provincial Highways, railways, or transit systems. These studies must align with the Regional Implementation Guideline for Noise Policies and Provincial Guideline NPC-300 and satisfy the criteria for noise warning and attenuation measures. While the Township's draft Official Plan generally includes noise mitigation policies related to land use compatibility (e.g., employment areas and aggregate operations), it lacks policy direction regarding transportation noise sources. To address this, we recommend adding the following policies to the Official Plan: "Noise from Transportation Sources a) Where a development application for a sensitive land use is proposed in the proximity of an existing or planned Regional Road, Provincial Highway, or railway, the applicant will be required to submit a Noise Study prepared by a qualified professional in accordance with Provincial and Regional noise guidelines. The noise criteria shown on Table 5 will be used in determining appropriate noise mitigation measures for the proposed development. Any required noise mitigation measures will be implemented through the development application review process, 5314543 Page 12 of 12	Incorporated

		noise warning and/or noise attenuation measures will be required prior to, or as a condition of approval of the development application in accordance with the provisions of Provincial or Regional noise guidelines. Such measures may include site design and building layout, noise warning clauses, noise attenuation barriers, air conditioning, and/or structural design measures such as multiple glazed windows and brick wall construction. Notwithstanding the above, sensitive land uses will be prohibited where the projected attenuated daytime noise level in the associated outdoor living area exceeds 70 dBA.c) The Township will require the consideration of passive noise attenuation measures, such as site design and building layout, as the preferred means of reducing noise impacts to minimize the need for structural noise attenuation barriers. Table 5: Noise Criteria for Noise Sensitive Land Uses Receiver Category Time Period Road Traffic Rail Traffic Outdoor Living area 0700 - 2300 Leq = 55 dBA Leq = 55 dBA Indoor Living area 0700 - 2300 Leq = 45 dBA Leq = 40 dBA Indoor Living area (Sleeping Quarters) 2300 - 0700 Leq = 40 dBA Leq = 35 dBA Leq means average sound level dBA is a unit of measurement for sound levels Please include a definition of the term “outdoor living area” as outlined in ROP glossary. In addition, the Township should consider adopting these same noise criteria for its own	
92	01-May-26	road network to ensure comprehensive mitigation for all new sensitive land uses.	Incorporated
93	June 12, 2026	From Grand River Transit- **Policy 4.6 (d) 3** To help facilitate transit use within employment areas, we recommend inserting the phrase “**transit and**” immediately after “including active transportation”.	Addressed
94	June 12, 2026	From Grand River Transit- **Policy 5.2 (e) 5** We recommend revising this policy to recognize the existing GRT Route 77 operating between Kitchener, Baden, and New Hamburg, as follows: “5. Provide for development patterns that support the integration of **the** Regional transit ~~service~~ **system**, ~~where planning to be available in the future,~~ **including existing and future services**.”	Addressed
95	June 12, 2026	From Grand River Transit- **Policy 8 (a)** 4. Regional staff recommend a minor revision to this policy to recognize existing transit services, as follows: “4. Ensure that new public service facilities, including hospitals and schools, are located in areas that are easily accessible by multiple transportation modes, including ~~transit where available~~ **existing or** future **transit services**.”	Addressed

96	June 12, 2026	From Grand River Transit- **Policy 8.1 (f) 1** We recommend broadening the scope of this policy by revising subsection 1, as follows: "f) In addition to requiring road widenings to secure the road allowances identified in Appendix B, the Township may require road widenings as a condition of approval of a development application and/or site plan, for the following purposes: 1. To provide for transit infrastructure, ~~pedestrian facilities and cycling lanes~~ **planned or existing, including dedicated transit right-of-way, station/stop infrastructure and/or amenities, as well as pedestrian facilities and cycling lanes."**	Addressed
97	June 12, 2026	From Grand River Transit- **Policy 8.1 (o)** The current wording implies this policy only applies to cycling and pedestrian amenities associated with Transportation Demand Management (TDM). Because these amenities may be required independently of TDM, we recommend broadening the scope to include transit amenities and clarifying the text, as follows: "o) The provision of **transit**, cycling, **and** pedestrian amenities ~~associated with transportation demand management~~, such as **transit shelters, pads, lighting**, bicycle racks, pedestrian lighting, or street furniture, that are required by the Township through a development application or site plan will be the financial responsibility of the applicant, unless funding is available through other sources satisfactory to the Township".	Addressed
98	June 12, 2026	From Grand River Transit - **Policy 8.1 (ab)** For clarity, Regional staff recommend refining the phrase "future extension of transit services" to **"future expansion of Regional transit services."**	Addressed
99	June 12, 2026	From Grand River Transit - **Policy 8.1 (ag)** We recommend inserting the words **"and transit services"** immediately after "the active transportation network" in the first sentence.	Incorporated
100	June 12, 2026	From Grand River Transit - **Policy 9.9 (o) 2** To facilitate transit use, we recommend inserting the phrase "**Regional transit system**" immediately following "active transportation network".	Not addressed, Wilmot does not have enough of a transit network to support this for all mid-rise buildings in the community

101	June 12, 2026	From Grand River Transit - **Policy 9.9 (z) – Crime Prevention Through Environmental Design (CPTED)** While the listed criteria effectively address physical security and natural surveillance (1st Generation CPTED), they do not include the current 2nd and 3rd Generation CPTED principles, which emphasize active placemaking, social cohesion, and inclusivity. To address this, we recommend adding the following new subsections 7 and 8: "z) All development shall be evaluated for consistency/adequacy of achieving the following Crime Prevention Through Environmental Design (CPTED) considerations; 1. … **7. Placemaking, public art, and community amenities that encourage positive social interaction and a sense of neighborhood ownership.** **8.** **Maintenance and management protocols to ensure the long-term cleanliness, care, and vitality of public and private spaces."**		Incorporated
102	June 12, 2026	On Water and Sewage Policies, **Policies 8.4 (i) 1, 2, and 6 – "Servicing Capacity" Test** The phrases "provided capacity exists," "sufficient treatment capacity exists," and "insufficient to accommodate growth" in these policies do not align with the PPS. As written these policies inadvertently establish capacity thresholds in the Baden-New Hamburg Water and Wastewater System as the primary criterion for allowing alternative servicing options. This language implies that if the municipal system temporarily lacks treatment capacity, development on private communal services or individual on-site services could be permitted within the urban area. Consistent with Provincial policy, non-municipal services should only be considered where municipal infrastructure is physically unavailable, unplanned or unfeasible to provide.	To address this, we recommend revising these policies to explicitly state that communal, individual on-site, or partial services are permitted only where municipal services are "not available, planned, or feasible."	Addressed.
103	June 12, 2026	On Water and Sewage Policies, **Policy 8.4 (i) – "Alternate Servicing and Treatment Options"** The term "alternate servicing and treatment options" in this heading and policy text is unclear. For clarity, this language should be updated to reflect the standard servicing terminology of the PPS: private communal water and sewage services, individual on site water and sewage, or partial services.		Addressed.

104	June 12, 2026	On Water and Sewage Policies, **Policies 8.4 (i) and (j) – Private Individual and Communal Services** As noted above, the PPS establishes a clear servicing hierarchy: private communal systems are preferred for multi-unit/lot developments where municipal services are not available, planned, or feasible. Individual on-site services are a secondary option, permitted only where communal options are also not feasible and long-term site conditions are appropriate. The Township's draft policies invert this hierarchy by defaulting to individual on-site services in rural settlement areas (Policy i) and framing communal servicing options as a secondary consideration (Policy j). To ensure consistency with the PPS, these policies should be revised so that private communal systems are the preferred option where municipal services cannot be provided.	Not addressed. Wilmot prefers the inverted approach.
105	June 12, 2026	On Water and Sewage Policies, Policy 8.4 (q) – Private Communal Services and "Alternative Services" The inclusion of "alternative individual wastewater treatment systems" does not appear to be applicable to this specific policy section. While undefined in the Plan, this term typically refers to individual tertiary treatment systems with a daily design flow of less than 10,000 Liters. The systems are privately owned and regulated under the Ontario Building Code (OBC). Given that the OBC already mandates individual maintenance contracts for these servicing systems, they do not require a Municipal Responsibility Agreement under Provincial Guideline D-5-2. Consequently, we recommend removing "alternative individual wastewater treatment systems" entirely from this policy to avoid confusion. Additionally, regarding actual private communal systems, subsection 8 states that in the event of default, "services" will be transferred to the Township or the Region. As written, this language generally refers only to the physical infrastructure and is silent on the transfer of the underlying land. To align with MECP Guideline D-5-2, we suggest revising this policy to state that "the communal services (including any associated interests in land)" be transferred at no cost. Furthermore, because the Region bears the ultimate environmental, financial, and public health liability for communal service failures, any financial security provided under subsection 9 of Policy 8.4 (q) should be to the satisfaction of both the Township and the Region. The policy language should be revised to explicitly include the Region. The phrase "to be on any combination of" does not align with PPS criteria regarding partial services and should be revised. Please see our detailed comments on partial services under the Glossary section below. Finally, the term "governance structure" in subsection 1 is unclear. For clarity, we suggest adding "such as a condominium corporation or other legal entity" immediately following this term. To address these points, we recommended revising Policy 8.4 (q) as follows:	Addressed.

106	June 12, 2026	**q)** **Where it has been determined that a proposed development of 6 or more units is to be on any combination of private communal sewage services, private communal water services, or alternative individual wastewater treatment systems, the Township shall require a Municipal Responsibility Agreement, to be registered on title, that requires:** **Where the Township and the Region have determined that private communal sewage services and/or private communal water services, either as standalone systems or through partial services in accordance with Policy [insert new partial services Policy No.], are the preferred method of servicing a proposed development of six or more lots/units, the Township shall ensure that a Municipal Responsibility Agreement (MRA) has been properly executed and registered on title prior to approving the development application. The MRA shall be executed between the developer and the Region, and shall include the following minimum requirements in accordance with Provincial guidelines:** **1. A governance structure, such as a condominium corporation or other legal entity, that sets out responsibilities for the ongoing operation, maintenance, repair and replacement of the communal services;** **2. Planning, design, and construction of the communal services to meet the Province's, Region's or Township's standards (as applicable) and to provide a comparable level of service to the Region's or the Township's systems (as applicable);** **3. An asset management plan be established in accordance with the Province's, Region's or Township's requirements (as applicable);** **4. Operation and maintenance of the communal services to meet the Province's, Region's or Township's standards (as applicable);** **5. Preservation of the right of Provincial or municipal access to be granted Regional, or Township entry to inspect the communal services;** **6. Appropriate easements are provided, if required;** **7. Operational and financial reports be submitted to the Region or Township as applicable.** **8. In the event of default, services be transferred to the Region or Township (as applicable) at no cost to the municipality; A definition of default and, in the event of default, an outline of remedial actions, including the transfer of communal services (and any associated interests in land) to the Region or Township (as applicable) at no cost, subject to the terms of the MRA; and,** **9. Financial security be provided to the Township's and the Region's satisfaction to cover long-term capital replacement and emergency operation costs.** **In response to this Provincial direction regarding private communal servicing systems, please note that the Region is currently preparing new guidelines regarding the design and review process for private communal systems. Regional staff will be reaching out to area municipalities this summer to collaborate on**	Incorporated

107	June 12, 2026	With regards to the OP's glossary, **Partial Services** While the Glossary appropriately includes the PPS definition of partial services, there are no corresponding governing policies in Section 8.4 of the Official Plan. Specifically, as drafted, the phrase “is to be on any combination of private communal sewage services, private communal water services, or alternative individual wastewater treatment systems” in Policy 8.4 (q) does not align with the PPS framework for two reasons. First, the PPS limits partial services to only two combinations: a) municipal sewage services or private communal sewage services combined with individual on-site water services; or b) municipal water services or private communal water services combined with individual on-site sewage. By omitting municipal services and permitting "any combination" of communal and individual systems, the draft policy is inconsistent with the PPS framework	Second, the PPS strictly limits the use of partial services to address localized health or environmental failures, or to allow for “minor infilling” and the logical “rounding out” of existing partially serviced settlement areas. The draft policy does not reflect these restrictions, potentially enabling partial services for broader development scenarios. To resolve this, Regional staff recommend revising Policy 8.4 (q) to limit partial services to the specific combinations defined in the PPS, and introducing policy criteria ensuring they are only used to address service remediation, minor infilling, or rounding out.	Incorporated, the PPS policies for partial services have been included directly into the Official Plan.
108	June 12, 2026	With Regards to the OP's glossary The following PPS terms are referenced throughout the Official Plan but are not defined in the Glossary. We recommend adding them to the Glossary to ensure the applicable policies are interpreted correctly. • **Individual on-site sewage services** • **Individual on-site water services** • **Municipal sewage services** • **Municipal water services** In addition, several different servicing terms are used interchangeably throughout the Plan. Examples include • “private sewage disposal,” “private septic,” “individual on-site sewage services,” and “individual wastewater treatment systems” • “private wells,” “private water supply,” and “individual on-site water services” While some of these variations appropriately reference specific technical or background documents (e.g., Wastewater Master Plan), Regional staff recommend standardizing these terms and using the PPS definitions wherever these terms are required for policy implementation.		Addressed
109		**Waterloo Region Public and Catholic School Boards**		
110	24-Apr-26	c) Where feasible, ~~and all-day access can be provided~~, the Township will facilitate ~~encourage~~ **facilitate** partnership arrangements, joint ventures and facility sharing with the school boards, other institutional and community groups to expand the supply of parks, open space and recreational facilities.		Partially implemented, all-day access is a key requirement on behalf of the Township. Language changed to encourage.

111	24-Apr-26	d) The Township will encourage the development of a system of linked green space, open space and trails throughout the Township relying on existing parklands, corridors associated with watercourses, utility corridors, conservation areas, ~~schools~~ and the cooperation of private landowners. *Where appropriate and feasible, and in consultation with the school boards, the Township will also explore connecting school sites to these systems.*	Addressed
112	24-Apr-26	We encourage the Township to consider including additional language to reinforce that the planning, location and protection of school sites are matters of provincial interest. To further remove barriers to future school development and/or expansion, the Boards request the Township consider include clear policy direction that explicitly support a range of school accommodation models, including grade 7 to 12 facilities and non-traditional models suited to higher-density areas (i.e.: compact and multi-storey schools integrated into mixed□use development). This flexibility is essential to ensure school and institutional uses co-located and integrated into the complete community fabric.	Partially implemented. p)□The Township will support a wide range of public schools and accommodation models to ensure school and institutional uses co-located and integrated into the complete community fabric.
113	24-Apr-26	The Boards request that the Draft Official Plan and implementing Zoning By-law explicitly confirm that publicly funded elementary and secondary schools, and associated education-related institutional uses (including child care centres and continuing education/learning facilities), are permitted in the following designations, except where specifically prohibited by hazard or other constraint policies: • Urban Core Area • Strategic Growth Area Overlay (where permissions follow the underlying designation) • Community Mixed Use • Urban Residential (as permitted “related” or institutional use, as applicable) • Settlement Residential and Settlement Core (Rural Settlement Areas)	Addressed (with the exception of Rural Settlement Areas)
114	24-Apr-26	Section 7.7, Policies for Specific Land Uses, notes that as part of “Parks, Public Services Facilities and Institutional Uses”, the Township will ensure that public service facilities, including hospitals and schools, are located in areas that are easily accessible by multiple transportation modes and transit (refer to pages 109 & 110). We request that the policy be revised as follows: l) The Township will, in consultation with school boards and / or other government agencies: • co_ordinate planning for public service facilities with land use planning and investment in public service facilities, • co locate and integrate public service facilities and public services within community hubs to promote cost effectiveness, where appropriate, • give priority to maintaining and adapting existing public service facilities and spaces as community hubs to meet community needs and optimize the long term viability of public investments, where appropriate, • ensure that new public service facilities, including hospitals and schools, are located in areas that are easily accessible by multiple transportation modes, including transit where available.	Addressed, though broadened to identify all other government agencies, not only schools.

115	24-Apr-26	To further align the Draft Official Plan with the PPS (2024), we request that the Township consider adding an overarching policy in Section 8 confirming that schools and other publicly funded education facilities, as well as other government uses, are permitted across all designations unless specifically prohibited elsewhere in the Plan or the Regional Official Policies Plan. Suggested wording is provided below: “The following uses will be permitted in all designations in the Township except where they are expressly prohibited or precluded by any other policy of this Plan or the Regional Official Plan: “Any use for the purpose of the Township, the Region, the Government of Ontario, or the Government of Canada or any department, agency, board or commission therefore, including Hydro One Networks and Enova Power, as well as schools and other education facilities operated by publicly funded school boards.”		Not addressed, the intent of this policy is covered by the edits to the Land Use Designations in Section 7.

	Date Received	Indigenous Community Comments	Township Response
		Chippewas of the Thames First Nation (COTTFN)	
1	08-May-26	We writing in response to your message dated April 3, 2026. Chippewas of the Thames First Nation (COTTFN) has engaged in this process in accordance with our Wiindmaagewin Consultation Protocol, which establishes clear expectations for how consultation and engagement is to be carried out. The protocol is guide that is utilized by technical staff to ensure that meaningful consultation is carried out on behalf of this First Nation. The Consultation Protocol clearly outlines meaningful consultation requires adequate capacity support, including the resourcing necessary to review materials, provide informed input, and participate effectively in planning processes that may effect our rights, lands, and interests. The Township's refusal to provide capacity funding raises serious concerns including failure to uphold COTTFN standards set out in the Wiindmaagewin Consultation Protocol, and undermining how COTTFN defines meaningful consultation. Meaningful consultation is not achieved through procedural inclusion, it requires good faith and adequate resources to enable the First Nation to participate. COTTFN remains committed to constructive engagement and to supporting planning process that respect our rights and interests. However, we must emphasize that continued participation without appropriate capacity does not meet our standard of meaningful consultation. We look forward to your follow up. We hope that the Township of Wilmot will reconsider this approach when engaging First Nations on future consultation matters.	The Township of Wilmot appreciates the opportunity for continued conversations with Chippewas of the Thames First Nation. Our preference continues to be conversations to outline where additional review or requested modifications may exist as opposed to an extensive review of the document. With that said, our project consultant is prepared to reallocate part of their project budget to support further review if desired. The Township would request some clarification around the scope and parameters of review, or potentially a working meeting (at the location of your choosing or over Teams) could take the place of a technical review. To ensure the most efficient review of the document, we would suggest the working meeting to discuss your input to the project. We would be available for a Teams meeting on June 12 before 10am or between 1pm and 3pm. If an alternative date or meeting venue is preferred, please let us know. Should you have any questions or wish to schedule a follow-up conversation, please feel free to contact myself, or our project consultant: Joe Nethery, Nethery Planning
		Six Nations of the Grand River	
2	01-Jun-26	Good afternoon I'd like to stress the importance of requiring proof of engagement as part of a complete application. Please tell me why Wilmot has not advanced our recommendation.	My apologies for not having had a chance to respond earlier. Through recent legislation, the Province limits the ability for municipalities to add additional requirements for complete applications and as such we are not in a position to add additional items to those that already exist in the current OP. With that said, the Township certainly agrees with the principle of early engagement. While this principle is embedded within the OP, the Township also acknowledges the recent Land Use Planning Together document that sets out the engagement process as agreed upon between Six Nations of the Grand River and the municipalities of Waterloo Region.
		Mississaugas of the Credit First Nation	

			This letter is intended to respond to your request that the Township outline how the input provided in Mississaugas of the Credit First Nation's letter dated September 19, 2025, was considered and incorporated into the draft Official Plan circulated on April 1, 2026. In review of the comments provided, the Township is not identifying individual Nations by name. This approach was selected in order to support equitable treatment of all Indigenous Communities with interests in the Township. We have reviewed the comment about the potential for an update to the Township's current Council Adopted Land Acknowledgement, but submit that the place for this conversation needs to be outside of the new Official Plan process. We have incorporated language in the Official Plan to provide for an update to the Land Acknowledgement without the need for a formal Official Plan Amendment process to do so. Foundational to the Official Plan is the Township's commitment to early and meaningful engagement on planning matters that may affect the rights and interests of Indigenous Communities (Section 1.2). The draft Official Plan includes policies that involve Indigenous partners in culture planning (Policy 6.4(a)), require Indigenous engagement on development applications on lands with identified or potential archaeological resources (Policy 6.4(o)), and provides deferral of approval policies on lands containing identified heritage resources (Policy 6.4(p)).
3	08-Apr-26	Thank you for letting us know that the draft Official Plan is now available for review. As indicated in our meeting in October 2025, we would like to proceed as follows: 1. We ask that the Township prepare a letter outlining how the input provided by MCFN in our September 19 letter has been incorporated in the draft document. 2. We expect to review the draft. Completion of this review is only made possible through the provision of capacity funding for our technical experts. Therefore, I have attached a Technical Review Agreement for your review and execution.	In preparation of the draft Official Plan, a comprehensive review of the Region of Waterloo Official Plan was completed to ensure consistency and alignment. The Region received a letter from Mississaugas of the Credit First Nation in 2022 expressing support for the Region's policies, of which have been carried forward into the Township Official Plan. The Township of Wilmot appreciates the conversations held and input received from the Mississaugas of the Credit First Nation on this project thus far and values the continued relationship. I acknowledge the request to review the draft. Our project consultant is prepared to reallocate part of their project budget to support the request. The Township would request some clarification around the scope and parameters of review, or potentially a working meeting (at the location of your choosing or over Teams) could take the place of a technical review. To ensure the most efficient review of the document, we would suggest the working meeting to discuss your input to the project.

	Date Received	Landowner Letters	Township Response
1	May 21st, 2026	Our client's property is municipally known as 1056 Snyder's Road West. It is located on the north side of Snyder's Road, adjacent to existing and planned residential development within the Baden Township Settlement Area. The subject lands have a total area of approximately 42.2 hectares and include an existing single detached dwelling, horse barn and outbuildings. Although that MCBH is aware that settlement area boundary expansions are not contemplated through the current Official Plan review, and as such, the subject lands have not been included as part of the Baden Urban Settlement Area Boundary, as shown in the Draft Official Plan released May 14, 2026, we request Township Council consider adjusting the Settlement Area to include the subject lands. The subject lands are appropriate to be included in the Baden Township Urban Area by virtue of their location, limitations for agricultural operations and accessibility to municipal services. In summary: The subject lands represent a logical location for future residential development for the following reasons: 1. The subject lands are bounded on three sides by existing and planned residential development, including with planned road stubs terminating at the subject lands. 2. The subject lands are partially within the Countryside Line, which identified as the location form long-term growth. 3. Including the subject lands in the Baden Settlement Area will result in a contiguous urban edge along Snyder's Road, between planned residential development and existing schools to the west. 4. These lands will optimize public investment in infrastructure and public service facilities by achieving contiguous, orderly development within walking distance of existing and planned schools, shopping and community facilities. 5. The development of these lands will utilize existing infrastructure along Snyder's Road and will optimize the infrastructure planned on lands to the east. 6. The current use of the property for agricultural purposes is severely constrained for livestock operations by the surrounding existing and planned residential uses. This includes restrictions on the capacity of the existing horse barn which would prevent any expansion of the operation.	Enough land has been designated for residential growth until 2051 as demonstrated by the Housing Needs Background Report.
2	November 18, 2025	MHBC are working with the landowners of 31 Hunter Street and 225, 233, 251-253 Huron Street, New Hamburg on the potential for redevelopment and intensification of the lands. We recently received approval from the GRCA for a Terms of Reference for a Two-Zone Floodplain Study for the lands. The study is intended to inform consideration of a special policy area on the lands to facilitate a residential intensification development on the lands. The proposal aligns with comments received by the public through the Official Plan consultation phase and outlined in the 'What We Heard' report, such as support for revitalizing downtown New Hamburg and higher density development in the downtown to strengthen the downtown.	Incorporated, subsequent letter. GRCA is reviewing, and the policies contained within have been incorporated into the Official Plan with the exception of Candidate Areas, as GRCA does not support this framework any longer.

3	May 21s, 2026	MHBC is writing on behalf of our client, owner of the lands municipally known as 2856 Sandhills Road in Baden (the “subject lands”). The purpose of this letter is to express support for the Rural designation of the subject lands as set out in the draft Township Official Plan, issued on May 14, 2026. The subject lands are located at the southwest corner of Gingerich Road and Township Road 16 (Sandhills Road). They have an area of 37 hectares (91 acres) and approximately 560 metres of frontage on Township Road 16. The subject lands are located outside the Baden Settlement Area Boundary and currently designated Prime Agricultural by the in-force Township Official Plan. We have reviewed the draft Official Plan, issued May 14, 2026. The draft Official Plan redesignates the subject lands from Prime Agricultural to Rural. The Rural designation generally applies to the lands on the south side of Gingrich Road between Sandills Road in the east and the Urban Settlement Area boundary in the west. We are supportive the designation of the subject lands as Rural in the draft Official Plan, Thank you for the opportunity to submit these comments.	Noted.
4	May 12th, 2026	On behalf of Cachet Homes, we are pleased to submit this correspondence as part of the Township of Wilmot Official Plan Review process regarding the lands municipally known as 1209 Waterloo Street in New Hamburg. The lands at 1209 Waterloo Street are approximately 14 acres in size, and are currently situated outside of the New Hamburg Urban Boundary; however, they are strategically located between two draft approved development areas, being the Wilmot Woods subdivision and the approved Cachet Homes subdivision lands as shown in Schedule “A”. In this regard, the subject lands represent a logical and appropriate extension and rounding out of the existing urban boundary, as well a “plug and play” servicing strategy with no infrastructure upgrades required to facilitate the development of the lands. Cachet Homes has recently taken an interest in the 1209 Waterloo Street lands with the intent of facilitating minor strategic refinements to the approved subdivision design for 1299 Waterloo Street. Specifically, these refinements include the potential relocation of parkland and a more efficient reconfiguration of the stormwater management facility. To assist the Township in understanding the scope and implications of the request, Cachet has prepared the attached concept plans for review and consideration. Both Concept 1 and Concept 2 illustrate a stormwater management pond of approximately five (5) acres. The primary distinction between the concepts relates to the configuration and size of the proposed parkland, ranging from approximately 1.3 acres to 3 acres. In this regard, Cachet requests that the Township consider one of the following approaches: 1. Designate the entirety of the 1209 Waterloo Street lands as “Urban Residential” and revise the New Hamburg Urban Boundary to encompass the full property; or 2. Revise the New Hamburg Urban Boundary to encompass the entirety of the property and apply a site-specific policy limiting approximately 8 acres of the lands to an “Urban Residential” designation, recognizing that approximately 6 acres are intended to accommodate stormwater management and parkland functions, as illustrated in the attached concept plans	Enough land has been designated for residential growth until 2051 as demonstrated by the Housing Needs Background Report.

May 21st, 2026	On behalf of our client, Carey Homes Inc., we are pleased to provide this submission to the Township of Wilmont ("the Township") for consideration during the Township's Official Plan Update process. This letter requests consideration of our client's lands in the Township Urban Area. In our view, the subject lands (1145 Christner Road) represent a logical expansion of the existing New Hamburg Urban Area, given the anticipated continued pressure for residential development in New Hamburg and the ability to service the subject lands through existing and planned infrastructure. The subject lands are located adjacent to the Township Urban Area boundary, as identified in the Region of Waterloo Official Plan. They are designated Prime Agricultural Area and are within the Countryside Line. The Countryside Line is intended to represent the long-term boundary between the existing Urban Area/Township Urban Areas and the countryside.The subject lands are also designated Prime Agricultural in the Township Official Plan, and are located within the Countryside Line. The purpose of this letter is to request that our client's lands be considered for inclusion in the New Hamburg settlement area boundary. The Wilmot Official Plan review represents an opportunity to include additional lands within the Settlement Area to accommodate opportunities for future growth. The subject lands represent one of the few remaining properties within New Hamburg that are located outside of the Urban Area boundary, but inside the Countryside Line. The lands are already linked with existing development, and allowance has been made for future road connections to complete this portion of New Hamburg and connect these lands to the existing community. Further, water servicing is available for the subject lands via Hostetler Road. Sanitary services also exist within Hostetler Road and capacity will be available for the subject lands upon completion of sanitary service upgrades planned by the Region. Based on the information presented at the Open House in October 2025, it does not appear that the Township intends to prepare an updated Residential Land Needs Assessment as part of their Official Plan Review. However, it is our view that completing an updated Land Needs Assessment for the Township will provide a more up-to-date indication of total land needs for the Township, including the need for additional greenfield land, taking into consideration the PPS requirements and the significant planned employment growth anticipated in Wilmot. With the planned employment growth,the need additional housing in the Township is anticipated. In our opinion, the subject lands should be included within the Township Urban Area. The subject lands are an ideal location for future residential growth for the following reasons: 1. They are located immediately adjacent to the existing Township Urban Area boundary and adjacent to lands already developed with residential uses. 2. The subject lands represent a natural extension of the Township Urban Area, particularly given their inclusion within the Countryside Line. 3. Water services are available for the subject lands through connections to Hostetler Road. 4. A future sanitary sewer could be extended to connect to the existing sanitary sewer in Hostetler Road. 5. Adequate sanitary servicing capacity will be available subject to the upgrades to the Forest Glen Wastewater Pumping Station and the installation of its connection to the Morningside Trunk Sewer, which are already planned by the Region. 6. The subject lands can support development that would further broaden the mix of housing available in the area. 7. The need for additional housing should be considered through the Official Plan review, particularly given the identified need for additional employment lands in Wilmot and the demand for new housing that can be anticipated with job creation. 8. The subject lands have frontage on two existing municipal roads and allowance has been made to extend new roads into the subject lands from Hostetler Road, which will link the lands to the existing residential community to the south. 9. There are no significant natural heritage features that would constrain development of the subject lands. 10. There are no impacts on nearby agricultural uses	Enough land has been designated for residential growth until 2051 as demonstrated by the Housing Needs Background Report.

May 7th, 2026	We are pleased to submit this letter on behalf of our client, Laurelcrest Homes, to provide comments on the recently released draft of the Township's new Official Plan; specifically, this letter pertains to the March 31, 2026 first draft of the new Official Plan. Our Team has reviewed the draft Official Plan (herein referred to as the 'draft OP') in comparison to the current Official Plan both overall and on a site-specific level looking at lands owned by our client, which includes the following addresses: • 1012 Snyder's Road West • 1149 Snyder's Road West This letter is intended to provide comments from our review and request clarification on certain policies within the draft OP. We note that these comments may be subject to change and further comments may be forthcoming as we continue to review the draft OP. General Review Commentseneral Review Comments 1. Policy 2.6a) provides a density target of 45 persons and jobs per gross hectare of land. We request clarification if this density target is intended to be the minimum density New Neighbourhoods shall achieve. 2. Policy 4.2h) provides that a servicing analysis shall be undertaken to evaluate the current and allocated capacity of the Baden-New Hamburg WWTP and develop staging plans to ensure that phasing of development does not conflict with capacity required to service other ongoing and planned developments at the cost of the development proponent. We suggest that this analysis should be completed by and at the cost of the Region as part of their infrastructureand capacity analysis. Site Specific Review and Comments An excerpt of Map 4 of the draft Official Plan identifying the following properties is attached for easy reference. 1012 Snyder's Road (North Lands) 1. The northern most portion of the lands included in the draft plan are located outside of the Countryside Line and designated Prime Agricultural on Map 2 of the New OP. 2. The proposed draft plan of subdivision provides for Open Space parkland and a Stormwater Management Facility within these lands. 3. Policy 7.7k) of the new OP provides that "parks shall be permitted in all land use designations". 4. We request confirmation that the Township supports the location of the proposed Park and Stormwater Management Facility on lands designated Prime Agricultural. 5. The remainder of the lands included in the draft plan are designated Future Development on Map 4 of the new OP. 6. A current Official Plan Amendment has been submitted to redesignate these lands from Prime Agricultural to Urban Areas, Designated Greenfield Area and Urban Residential. 7. We request that the submitted Official Plan Amendment redesignations be applied to the new draft OP and that the lands within the Baden Boundary are designated as Urban Residential in Map 4 of the new OP. 1149 Snyder's Road 1. Map 4 of the draft new OP designates the lands addressed as 1149 Snyder's Road as Future Development and a portion of the lands contains the Strategic Growth Area Overlay. 2. The portion of the subject lands identified as Strategic Growth Area (SGA) extends along a portion of the Synder's Road frontage as well as the Nafziger Road frontage. 3. We request that Map 4 of the draft new OP is revised to limit the extent of the Strategic Growth Area to only the portion of the property with frontage on Synder's Road West and west of the Waterloo-Oxford District Secondary School property line. 4. Policy 7.1e) of the new OP provides that the focus of the SGA is to accommodate intensification and mixed-use development in Mid-Rise Buildings. 5. We suggest that a three storey built form is an appropriate permitted use within an SGA. We request that policy 7.1e) is reworded to exclude 'Mid-Rise Buildings'. 6. We further request confirmation that the intention of the SGA is to provide for mixed use sites and that within the SGA building types with a single use are permitted.	This target represents the average density the Township aims to achieve across new neighbourhoods over the life of the Plan. Given the limited amount of greenfield land remaining, the Township expects new development applications to meet this density target.The submission is still under review, but in general we are not opposed to Township infrastructure (parks, swm ponds, etc.) being located outside of the urban boundary. The project team will update the mapping prior to the final version of the plan being released. The intent of the SGA overlay is to identify locations where a range and mix of land uses and built forms, including mid-rise development, may be appropriate to achieve long-term intensification objectives. However, the underlying land use designation will apply, which may permit low-rise and single-use buildings.The SGA boundary shown on Map 4 reflects a broader planning vision; however, site-specific refinements can be considered through a supporting planning rationale as part of your formal application.

7	May 21st, 2026	On behalf of our client, Stremma Developments Inc., I am providing the following comments on the Second Draft of the Township's new Official Plan ('draft Official Plan') as it relates to their 73.5 hectare property generally located at the southeast corner of the Snyder's Road West and Nafziger Roadintersection. As you know, we have provided written comments on the first draft of the Official Plan (please see our letter date May 6, 2026). At that time, we requested the Township reconsider the extent of the Strategic Growth Area (SGA) identified on our client's lands. We note this has not been changed with the second draft the Official Plan. Again, we respectfully request the Township revisit the extent of this designation on our client's lands along the Nafziger Road frontage. We understand the desire to have such a designation at an important intersection such as Snyder's Road West and Nafziger Road, however, in this instance, theexisting cemetery at the southeast corner of the intersection restricts any frontage and exposure to the Nafziger Road. By extending the Strategic Growth Area on our client's lands south of the cemetery along the frontage of Nafziger Road simply creates a disjointed land use pattern, that we believe will be difficult to market and achieve the planned function of this SGA. Accordingly, we respectfully request that the Township eliminate the extent of the SGA designation identified along our client's frontage on Nafziger Road	The intent of the SGA overlay is to identify locations where a range and mix of land uses and built forms, including mid-rise development, may be appropriate to achieve long-term intensification objectives. However, the underlying land use designation will apply, which may permit low-rise and single-use buildings. The SGA boundary shown on Map 4 reflects a broader planning vision; however, site-specific refinements can be considered through a supporting planning rationale as part of your formal application.
8	07-Jan-26	1. Township Land Ownership … as per the attached portion of a survey can you confirm that indeed the Township owns both the triangular piece of land as well as the portion of the unopened Scott Street adjacent to Albert Street as hilited ? We are working with TCMH to respond to questions and comments as discussed at our recent meeting with the Township and TCMH . 2. Official Plan Review … in looking online and also noted in the Record recently I understand that the Township is in the midst of an OP review . My request on behalf of TCMH is that the portion of their lands that are north of the current "north SWM pond " to their northerly property limits at Albert Street and from Victoria Street to their westerly property limit be looked at to encompass that entire property in the OP to allow future development. The current OP has a portion of these lands shown however we would prefer if all that area be included as part of the current OP process . I recognize that a portion of the lands will be GRCA regulated due to the steep slope issue as well as an anticipated transfer of title of some of the most westerly lands from the river up to the Albert Street area as part of our mutual land use rearranging.	According to Teranet data, yes the triangular piece of land as well as the portion of the unopened Scott Street are owned by the Township. Addressed.
9	25-Aug-25	Lands requested to be designated. Legal Description of the Schmidt Properties (Baden): Property details removed for privacy. We refer you to the attached November 27, 2023 letter from GSP Group, the Planners for the Estate of Schmidt, a copy of which is enclosed for your reference. The Estate's position on the Ministry of Municipal Affairs and Housing Official Plan Review remains the same as identified therein and is expected in future to remain unchanged. The lands so identified in the said letter are delineated in the attached Map from Report and the Staff Descriptions of the parcels referred to therein are also attached as excerpted from the Township of Wilmot staff report DS 2024-07. The PIN descriptions for the lands in issue owned by the Estate are as follows: We would be pleased to meet with any party or body corporate to answer questions with respect to the above-stated position and/or provide clarity in respect of the Estate's position set forth herein.	Addressed.

16-Jun-26		I am writing to express concern and seek ctarity regarding information communicated about the land use designation for the industria[[ands immediatety east of the existing residentiat properties fronting Maurice St- in New Hamburg- lnformation communicated is not consistent and creates confusion. Specificatty: 1 . Map 4.21 of the Current Officiat Ptan identifies the [ands immediatety east of the residentiat properties fronting Maurice St. as Light lndustrial. The [ands east and north of the Light lndustrial [ands are identified as General lndustriat. 2. Schedute A3-12 of the Proposed New Officiat Ptan is more or tess simitar to Map 4.2 of the Current Officiat Ptan; however, what is catled Light Industria[and General lndustrial on Map 4.2 is calted Emptoyment Area - Mixed Use and Emptoyment Areas respectivety. 3. Map 33 presented at the Aprit 28, 2026 Pubtic Open House identifies att these lands onty as Emptoyment Area. There is no distinction of there being different designations to these lands. Yet, there are other areas shown on the map as Mixed Emptoyment. Referring to documentation in the Current Officiat Plana and the Proposed New Officiat Ptan5 one gets the sense there is tittte intended change to the way the [ands immediatety east of the residentiaI properties witt be administered.	Thank you for your letter. Apologies for any confusion throughout the process - you are correct that this is largely a matter of nomenclature. •Current Official Plan – Map 4.2: Light Industrial •Draft 1 – Map 3 (dated March 31): Employment Lands (in error) •Draft 2 – Schedule A3-1 (Dated May 14): Employment Area – Mixed Use
10		Specificatl.y, the tands witt be reserved primarityfor "office uses and smatl-scale, setf-contained industriaI uses that produce and/or store a product where there is low probabitity of fugitive emissions". Stand-atone open storage uses are prohibited. Some cutturat, recreationat and commercia[uses may be permitted under certain conditions. Ptease ctarify for me which is intended in the Proposed New Officiat Ptan. ls it as shown on Schedute A3-1 or as shown on Map 3? If the intention is as shown on Schedute A3-1, it appears things wilt remain more or [ess the same with the changes simpty being different nomenclature. Ptease inform if my understanding is corect or etse wise correct me. If the intention is as shown on Map 3, I take great exception and object as the land uses permitted in the Emptoyment Areaso are no where near as compatibte with the neighbouring residentiat [and use as is Light lndustrial / Emptoyment Area- Mixed Use. Notwithstanding the above, concerns expressed in my letter regarding the devetopment apptication for these [ands remain. I trust they are being seriousty considered in the detiberations regarding the proposed new official plan.	Draft 1, which was presented at the April 28, 2026 Open House, contained a mapping error affecting these lands. It was identified at that time that this portion of the property should be designated Mixed Employment to better align with the existing Light Industrial policies, which are intended to support a range of compatible employment uses as well as some community, recreation, and commercial uses. This is consistent with the previously approved zoning amendment which will remain in effect. Accordingly, in Draft 2, presented to Council on May 21, corrected the designation to Mixed Employment. As part of this update, the designation name was also revised to Employment Area – Mixed Use to align with the Province’s new standardized land use terminology. This designation will be used in the final version going to Council in July for adoption.

	Date Received	Public Comments	Township Response
1	10-Apr-26	Hi Andrew or Rachel, A question about the Official Plan process. What will be done with the input received at the upcoming community/public meetings? Will a summary of input be presented to Council, or any changes be made to the draft before Council discusses it? Thanks,	Thank you for the inquiry. Our intent is to incorporate public feedback into the draft before the Statutory Public Meeting on May 21st, and then any further comments from Council and/or the public will be incorporated prior to Council Adoption. A companion engagement summary will be produced for Council Adoption in June that documents all feedback received from this round of public engagement on the project.
2	15-Apr-26	Hello, My name is and I've lived in Baden since 1987. Ironically I work at the Rec Center on Wednesday nights and leave here at 5:30 and am not done until 8:00. I'd like to arrange for a one on one call as I have so many concerns about the direction this small town is headed in. From your post I wasn't sure if I register today and then you contact me to arrange a mutually convenient time to share my thoughts. Thank you,	My apologies for any confusion in the posting, the intention was to hold the one on one conversations yesterday. That said, I would still be happy to connect with you by phone to hear your thoughts on the draft Official Plan and would appreciate you letting me know your availability. As another option, we will be hosting an open house for the draft Official Plan at the Rec Complex on April 28, and you are welcome to drop in at any time between 6:00 and 8:00 p.m. to speak with a member of the project team.
3	April 16, 2026	The GreenWR submission provided a sustainability- and climate-focused perspective on the Township of Wilmot's Official Plan, advocating for stronger integration of the 2022 Regional Official Plan principles—particularly compact, transit-supportive communities, farmland protection, and reduced urban sprawl—while emphasizing a need for aggressive greenhouse gas (GHG) reduction policies, including fossil-fuel-free buildings, EV and solar-ready infrastructure, and annual emissions tracking and accountability; it calls for firm policy language (*"must" instead of "encourage"*), preservation of the Countryside Line and agricultural lands as a core economic and food security asset, directing all growth and employment within existing urban boundaries, and requiring all development to demonstrate environmental and financial impacts, ultimately positioning the Official Plan as a long-term tool to ensure climate resilience, sustainable growth, and protection of rural character and farmland.	Noted. Addressed by policy changes throughout the document where possible.

April 16, 2026	In Section 1.1, Purpose, the last sentence on page 8, sets out a goal (aim), in part, “supporting the Township’s evolving rural character.” I do not understand whether the rural character refers to the Township as a whole or there is a specific rural character area that is supported. Please explain the reference to “evolving”. In Section 1.7, Vision and Principles, the first sentence under “Vision” repeats the same intent – “Wilmot will plan to guide growth in a balanced way that strengthens our evolving and welcoming countryside community.” Here, the “welcoming countryside community” seems to refer to Wilmot as a whole. Is this statement and that in Section 1.1 aspirational or is the Official Plan policies providing direction to Council and the public? I suggest that there should be clear understanding of the temporal meaning of “evolving” and who is welcoming whom in the countryside. In the opening policies of Section 2.3, reference is made to opportunities to promoting “agri-food” businesses. Agri-food is a very broad term that characterizes virtually the activities from “farm-to-fork”. It would be helpful if there is fuller explanation of the nature of agri-food and how it applies to the Township. Clusters In my previous submission, dated November 1, 2025, I explained my understanding of housing clusters/small family campground in the Countryside. In reading the proposed Official Plan, I do not see policies that provide opportunities or discourage this form of living. It would be helpful to provide guidance regarding, what I anticipate, is an opportunity. All these comments and ideas are submitted to Council for consideration. Please provide me with the next version of the proposed Official Plan and Council’s decision adopting the Official Plan. Section 1.4 Planning Act In my experience, the Planning Act does not represent “overarching Provincial legislation which governs land use planning”. I prefer that the word overarching” be replaced with the term “oversight”. The provincial government has an oversight function of municipal planning as explained in this paragraph. Land Use Planning The term “land use planning” is cited 114 times in the proposed Official Plan. Through the objective eyes of an observer, I do not understand the meaning of “land use planning”. The term “land use” is not defined in the Planning Act and therefore, it may be misunderstood. Reading this proposed Official Plan, it seems that “land use” refers to development primarily in terms of buildings and structures. In my experience, land use means people too! It would be helpful if in the Official Plan, there is an explanation of land use planning as a regulation and process. I may be presumptuous, but as guidance, here is my typical understanding of land use planning” “Municipal land use planning is a decision-making system and a process that regulates and guides, in the public interest, how, where and why people live, work and enjoy within communities.” Land Use I suggest that the term “land use” should be included in the Glossary, as it is intended to be used in the Township of Wilmot. Section 2.3 Countryside Land Use System The intent here is to provide policies for land uses, as understood by the public and Council. The Waterloo Moraine is integral to the Protected Countryside and should be discussed in this section, unless there is a separate policy section.	Thank you for your comments. I want to confirm receipt of your previous email and advise that these will be considered by the project team in the context of existing environmental policies that remain consistent with the current PPS and ROP. In response to this submission, Section 1 of the draft Official Plan was developed based on input received through community engagement and while not policy, is intended to provide direction to policy within the plan. Although growth and change are expected over the planning horizon; maintaining the Township’s rural character was a key outcome of the community visioning exercise. In response to your previous email re: small family compounds/land leases, the proposed 4 ‘lots’ on a host property would not be consistent with the PPS which only permits 2 additional residential units (one in the main dwelling and one within an ancillary building) on prime agricultural lots. This direction has been included within the draft OP policies. The zoning by-law also requires these buildings to be clustered to minimize impacts to agricultural lands. These two documents together discourage the proposed form of living. Please note a companion engagement summary will be produced for Council that documents the feedback received on the project. I will notify you when the next draft of the plan is available for review.

5	16-Apr-26	I read and reviewed the proposed Official Plan. In addition to my previous written submission, I am providing two additional submissions for consideration by the municipality. This first submission relates to the Waterloo Moraine. I find a significant gap in this document that does not identify the Waterloo moraine and its importance in protecting water resources and the natural resources. The Moraine is present in a consequential part of Wilmot Township. The significance of the Moraine is well- known and has been researched extensively by scientists. For your guidance, I attach a paper that is contained in the Canadian Water Resources Journal that was published in 2014.	Noted.
6	24-Apr-26	Hi there, I just curious… Are we considered under the province to be a “fast growing municipality”? Thanks,	Thank you for your question. Wilmot is not considered a ‘large and fast-growing’ municipality. These municipalities are identified by the Provincial Planning Statement under Schedule 1, which I have included for your convenience.
7	28-Apr-26	I hope your team is having a great day! Myself and (copied) are planners representing Cachet Developments (NH) Inc.. They own the property located along the west side of Nafziger Road, extending approximately 874.15 metres north of the Canadian National Railway corridor in New Hamburg within the Township of Wilmot, Region of Waterloo, Ontario. The municipally-owned Ivan Gingerich Drain corridor bisects the site. We've reviewed the Draft OP and have no concerns regarding Cachet's property. Unfortunately, we are unable to attend the public open house tonight at the Wilmot Recreation Complex. Are you able to share PDF copies of the information boards/etc that will be on display this evening?	We are simply displaying the draft maps on boards and have copies of the draft plan available for review and comment at the open house this evening. Thank you,
8	28-Apr-26	Thank you for letting us know. Adding some additional clarification and context for the Township's team: our team reviewed the Draft OP and have no concerns at present based on the draft materials that were circulated. The proposed land use designations/overlays and policies for Cachet's property generally align with the plans Council approved on October 6, 2025 for the property (e.g., OPA No. 14, By-Law 2025-61, and Draft Plan of Subdivision 30T-24601). We'll be in touch should any other questions arise as the Township advances its new Official Plan project. Thank you!	Noted.

9	05-May-26	On page 58 of the draft OP, it mentions “The Township will give priority to the cycling routes identified on Map 7 of this Plan, the Wilmot Trails Master Plan and Implementation Guidelines and the Walk Cycle Waterloo Region Active Transportation Master Plan.” •I clicked on Map 7 on the Engage WR, Wilmot site and I do not see any cycling routes identified. Should an updated map be loaded onto the website? •Is road striping included in the OP such as connecting the bike lanes on Waterloo St with Bleams Rd (by McDonalds)? •How can I find the Wilmot Trails Master Plan and Implementation Guidelines as well as the Walk, Cycle Waterloo Region Active Transportation Master Plan? Thank you,	In response to your questions/comments below: 1. The reference to Map 7 below will be removed from this policy and reference will point to the appropriate associated documents as these guidelines/plans may be updated after the OP is in effect and generally include more detailed information. 2. Design level details such as road striping will not be included in the Official Plan. The area you reference below is identified in the Trails Masterplan as an ‘on road cycling opportunity’. The implementation guidelines reference the following development standards for bike lanes: Ministry of Transportation (MTO) Bikeways Planning and Design Guidelines, the Transportation Association of Canada (TAC) Bikeway Traffic Control Guidelines (Second Edition, 2012), and the Ontario Traffic Manual Book 18 – Cycling Facilities. 3. The Wilmot Trails Master Plan and Implementation Guidelines can be found here: https://www.wilmot.ca/recreation-and-culture/trails/ The Region’s most up to date Transportation Master Plan can be found here (is currently being updated and will be referred to as the ‘Integrated Mobility Plan’ once complete): https://www.regionofwaterloo.ca/en/living-here/resources/Transportation-Master-Plan/DOCS_ADMIN-3030800-v3-TMP_Report_Moving_Forward_Main_Report_FINAL_2019-06-12.pdf
10	May 21, 2026	The Cizitens For Safe Groundwater submission included many comments, generally supporting its direction to concentrate growth in Baden and New Hamburg, maintain a Countryside Line, and protect agricultural land, natural heritage, and groundwater resources, but emphasizing that the Plan should be strengthened—particularly by explicitly recognizing and mapping the Waterloo Moraine as a distinct groundwater and landform system with its own protection framework; the submission highlights the Plan’s strong foundation in sustainable growth management, source water protection, and servicing discipline, while recommending enhancements such as stronger protection measures for recharge areas, tighter controls on aggregate extraction, higher intensification targets over time, clearer limits on rural exceptions, and the addition of a formal “Waterloo Moraine Protection Overlay” to better safeguard long-term water resources, farmland continuity, and environmental integrity.	Noted. Addressed by policy changes throughout the document where possible.
11	May 21, 2026	A delegate from this statutory public meeting where hoping for a new policy within the OP that highlights how Wilmots agricultural sector is represented and requested the following be added:	Incorporated policy into the Official Plan.
12	May 21, 2026	Other delegates from council raised concern with the draft OP's lack of regard for the feasiablity of its growth goals, espacially in context of its water servicing.	Noted. The Official Plan contains servicing policies to address this.
13	May 21, 2026	One delegate requeted for a much more detailed compendium of feedback for this draft OP's procedure.	One will be provided.

May 21, 2026	The Subject Property is located in St. Agatha, an unincorporated community and rural settlement area within the Township. It is approximately 6.145 acres in size and is currently developed with seven institutional/residential buildings totalling approximately 42,000 square feet. These buildings include dormitories, common areas, and commercial kitchens purpose built for group living. The property has a long-standing history of continuous institutional residential use spanning more than 150 years, having originally been established as an orphanage in 1858 and, more recently, used as student dormitories associated with a private school. The Subject Property has been developed substantially in its current form for approximately the last 50 years. Schedule A3-5 – Rural Settlement Area St. Agatha in the 2026 Draft OP proposes to designate approximately two-thirds of the Subject Property as “Neighbourhoods – Rural Settlement Residential” and one-third, largely fronting Notre Dame Drive with a small portion fronting Erb’s Road, as “Mixed-Use - Rural Settlement Core”. The inclusion of a portion of the Subject Property, together with other lands along Notre Dame Drive and Erbs Road, in the “Mixed-Use - Rural Settlement Core” designation is new; in the 2024 Consolidated OP, this designation applies only to a limited number of properties west of the Notre Dame/Erb’s Road intersection. The Township retained Nethery Planning (Nethery) to undertake background research and consultation and to assist in preparing the new Official Plan. While Additional Needs Housing was not specifically identified as a key direction in the Housing Report, that use has been introduced in the March and May versions of the 2026 Draft OP, reflecting the definition in the Provincial Planning Statement, 2024 (“PPS”). The existing “Special Needs Housing” policies have been replaced with “Additional Needs Housing” policies; however, the new policies are more restrictive and do not appear to align with the enabling intent of the PPS.	

		The 2026 Draft OP introduces a more restrictive framework for Additional Needs Housing by limiting where it may locate through zoning controls, locational criteria, and servicing requirements. Rather than enabling a broad range of housing options and typologies through flexible land use permissions, the draft policies would impose conditions relating to scale, proximity to services, and the availability of certain amenities. In our view, these restrictions constrain the flexibility contemplated by both the Housing Report and the PPS. Despite the Housing Report's emphasis on aging in place and increased seniors housing, the additional regulatory requirements in the 2026 Draft OP could impede the development of these forms of housing. In this respect, the draft represents a shift away from the report's stated objectives and the PPS emphasis on flexibility and inclusiveness in housing delivery. Policy 4.5 (Housing Needs), which seeks to permit and facilitate all defined housing options, appears to conflict with Policy 5.3 (Additional Needs Housing), which imposes restrictive criteria and locational limitations on one subset of those housing options. There is also no clear connection between the background studies prepared to inform the Official Plan review and the restrictive policy framework proposed for Additional Needs Housing. Policy 5.3(b) classifies Additional Needs Housing as small-scale (five or fewer beds/residents) and large-scale (more than five beds/residents). However, neither the Nethery Housing Report nor Staff Report DS-2026-07 (May 14, 2026) appears to provide any rationale for this threshold. Further, the use of number of beds as a proxy for land use intensity, rather than built form, site layout, or density-based considerations, has not been explained or justified. A number of the proposed criteria applicable to all sizes of Additional Needs Housing in Policy 5.3(b) are inappropriate. For example, the criteria in Policy 5.3(b)3 regarding municipal property maintenance standards is not a planning consideration and implies that Additional Needs Housing could somehow be problematic as it relates to compliance with municipal property standards or other municipal regulations. This suggestion is inappropriate and not supported by any evidence or study. The proposed licensing criterion in Policy 5.3(b)4 is also problematic because not all forms of Additional Needs Housing require a licence to operate. As drafted, that requirement could effectively preclude certain forms of Additional Needs Housing - for example, addiction recovery housing - that may not be subject to a licensing regime at all.	
14	May 21, 2026	The Nith Valley EcoBoosters (NVEB) is a not-for-profit, politically non-partisan volunteer group committed to achieving and supporting a long-term healthy environment in Wilmot and Wellesley Townships through education, action and collaboration. The following are key considerations that NVEB feels must be included in the new Official Plans for both Wilmot and Wellesley Townships. Each Township must be accountable for its new Official Plan once in effect. Climate/Environment • The Official Plan needs to include a very strong statement on the importance of reducing total greenhouse gas (GHG) emissions with a target of 80% reduction from 2010 levels by 2050. • All new development applications in the Township must show the impact they will have on both corporate and community GHG emissions. • The Township must incentivise developments with no natural gas connections to dwellings. • The Township must incentivise developments with EV charging capability. • The Township must track GHG emissions and report progress quarterly. • The Township must produce an action plan to meet 2050 targets within one year of approval of the Official Plan.	Responded to through a different municipal process.

15		**Transportation** • The Township must prioritize the creation of “15 minute neighbourhoods” where people can meet most of their daily transportation needs by walking, cycling, or rolling. • The Township must continue to work with the Region of Waterloo to ensure the availability of public transit in existing and new developments. • Given the rapidly growing use of e-bikes, the Township must provide appropriately sized paved shoulders on urban streets and Township roads for active transportation. **Services** • The Township must protect ground water sources since they provide most of the Township’s drinking water. • All development must be within the capacity of Township services and infrastructure (e.g. water and sewage) and support a long-term healthy environment. **Agriculture** • Given that farmland is increasingly important for long term food security and for mitigation of the impacts of the climate crisis (i.e. carbon capture, flood control), the Township must permanently protect the countryside line to prevent any reduction in the amount of farmland through urban development. • Section 3.8 of the current Official Plan (The Protected Countryside) must be carried forward in whole to the new Official Plan	Noted. Where possible, updated have been made in response to what falls within Wilmot's ability to require in an Official Plan. The province has significantly limited municipal abilities to require many of the things proposed.
16	May 21, 2026	Hello Wilmot Official Plan Team, My name is Katie Honek, and I live in New Hamburg. I attended tonight's public meeting (May 21) regarding the Wilmot Official Plan. I was glad to learn that there will be a compendium documenting the community's comments and concerns, that's excellent. Additionally, I understand that Indigenous communities have been engaged with in creation of this plan in terms of land use, and sustainability of "waters and resources for the benefit of generations to come." I feel this work is crucial to creating this plan, and I appreciate it. I was informed during one of the community open houses that some requests from Six Nations were not included in the Official Plan. I would like to strenuously recommend that the forthcoming compendium should include all requests from Indigenous collaborators, noting whether they have been integrated and (if not) why that was the case. I've cc'd Mayor Salonen and our Wilmot Council Members for them to also note that this feedback from Indigenous Nations is imperative to consider.	Noted. Indigenous communities have been engaged and where provincial policy permits, the Township has implemented changes.

17	21-May-26	The Official Plan you have posted on EngageWR: Wilmot alarms me, because its language is so weak about protecting farmland. For example, Section 4.3, Countryside Land Use System starts out with a positive statement Within the Prime Agricultural Area and Rural Area designations, all types, sizes and intensities of agricultural uses and normal farm practices will be promoted and protected in accordance with Provincial standards. The following policies will apply with respect to the Agricultural System: but this is immediately weakened by launching into what Wilmot will do when "agricultural uses and normal farm practices" are made impossible by developments your council will approve. viz. 1. Where negative impacts on the agri-food network are unavoidable, they will be assessed, minimized, and mitigated to the extent feasible This distresses me, as a Waterloo resident who, for the last 20 years, has relied on Gmach Gardens, and more recently Fertile Ground's stand at the Kitchener Farmers Market for leeks, potatoes, onions, carrots, rutabagas, cabbages to get me through the entire winter without ever having to buy any increasingly expensive imported vegetables. It has saved our family hundreds, probably thousands, of dollars. I really want to see an Official Plan which imagines first, second, third and fourth, how "agricultural uses and normal farm practices" may be protected -- despite threats to them. I don't see this vision in your plan. Your plan could -- and MUST -- be better.	Noted. Farmland Policies Stregthened throughout, including incorporating policies to protect the agri-food network.
18	28-May-26	I'm writing as a current resident of Baden. I wanted to provide feedback most importantly on the density minimums and targets. The current region mandate of 30% high density in each development does not suit Wilmot. The Official Plan needs to be updated, one size fits all developments approach does not fit Wilmot, higher density in the more urban core and/or along arterial roads is acceptable. I expect this will keep our overall density high enough to allow lower density further from main roads like most municipalities do. I recognize the need to maintain farm land and I think a balanced approach that encourages higher density in the right locations for Wilmot is the correct path forward for us as a community. Thank you for considering my feedback.	Thank you for taking the time to provide comments regarding the new Official Plan. Your comments will be considered as the project team finalizes the plan and will be included in a summary feedback document which will be posted on the project page (https://www.engagewr.ca/new-wilmot-official-plan) prior to the recommendation report being brought forward to Council.
19	08-Jun-26	I am putting together my thoughts and responses to the official plan. Is the last one available to the one from May 21? Also I thought there was going to be a document highlighting the changes that had been introduced. Can you please provide me with the latest working document?	Yes, the most recent draft is the one that was presented to Council on May 21st and is available on the Engage Page. The revised plan, including the redlined version, and the feedback summary document will be available for public review at the end of June as requested by Council in the motion passed at the public meeting. The project team encourages submission of written comments as soon as possible for consideration as we prepare the final version for Council.

			Over the past year, several public engagement opportunities have been held regarding the Official Plan. Two public open houses took place in April, including one in St. Agatha on April 15. The statutory public meeting was held on May 21 and was advertised in the Wilmot-Tavistock Gazette as well as on the project's Engage page. The final version of the Plan will be made available to the public at the end of June and is scheduled to be presented to Council for adoption at the July 27 Council meeting. For clarity, the draft Official Plan does not propose redesignating any part of St. Agatha as an "Urban Core Area." This designation is intended only for the downtown areas of Baden and New Hamburg. The plan anticipates relatively limited growth within the Rural Settlement Areas. That said, the Plan does propose an expansion of the Settlement Core Area in St. Agatha along the main corridors of Notre Dame Drive and Erb's Road. This designation is now referred to as "Mixed Use – Rural Settlement Area." (see most recent map: https://hdp-ca-prod-app-wr-engage-files.s3.ca-central-1.amazonaws.com/1917/7878/4826/Schedule_A3-5_StAgatha1.pdf) The purpose of this designation is to: • Provide for a mix of residential and commercial uses. This Plan encourages a range and mix of housing types, commercial and compatible uses in Settlement Core Areas. • Proposed development within Rural Settlement Core Areas for the purposes of commercial and service uses will be encouraged to locate within the Settlement Core Area designation. • The Township Zoning By-law will regulate specific uses in the Rural Settlement Core Area It is important to note that the Official Plan provides policy direction and while it may direct growth to certain areas, it does not constitute a development approval. Any change in land use, for example, from residential to commercial, would still require a zoning by-law amendment application. As part of this process, the applicant would need to demonstrate compatibility with surrounding land uses and provide supporting studies, including environmental and servicing analyses. These requirements are set out in the Official Plan. While servicing infrastructure limitations generally constrain the scale and range of uses within rural settlement areas, the designation does create opportunities to introduce additional services that support the local community. Please note that any zoning by-law amendment is also subject to a public process where property owners within 120 metres are notified, and a public meeting is held as part of the review.
20	10-Jun-26	Can you please let me know if this has been confirmed and if not is there a public meeting to discuss this? Regards,	I would encourage you to provide any written comments you may have at your earliest convenience so they can be considered by the project team prior to finalization.
21	June 22, 2026	The township had a meeting with Nachurs Alpine this afternoon, who expressed concerns with the adjacent mixed-use designation on the Cachet lands and the permissiveness of residential/sensitive uses in the policy.	Addressed through limiting residential permissions on a portion of the Cachet subdivision lands, through a site specific policy.

	23-Jun-26		Thank you for taking the time to share your concerns. I want to emphasize that the Township is not trying to rush or bypass public input. The Official Plan update and related planning work have been underway since last summer and have included multiple opportunities for in-person public engagement. In May, Council provided an additional month for residents to submit comments, and the plan is now intended to go to Council on July 27th for adoption. The Official Plan does not place decision-making authority in the hands of the developers. While developers bring forward applications, any development proposal must be reviewed by staff and approved by Council in accordance with Provincial policy and the Official Plan. I hear your concerns about traffic, density, and the pace of development. These are important considerations and are evaluated through detailed studies (such as traffic impact, servicing, and environmental reviews) at the time development applications are submitted. Your comments about wanting green space, parks, and livable neighbourhoods are exactly the types of outcomes the Official Plan is intended to support. These are key components of complete communities and are considered as part of both long-term planning and individual development applications. Regarding your concern about lands being taken by the Region, I am not aware of any policy in the plan that allows the Region to take any Township land at their sole discretion.
22		Hi, I feel like this plan is being rammed through without taking the concerns of the residents seriously. Why is that? Who is making money from this? Why is council not taking its residents concerns seriously about not wanting to be turned in to a city? Why is activa not being held to task to change its desires for OUR town? I think most of us understand that building will happen, but a slow and steady pace is the way, not bowing to the whims of mega builders. Also, I noticed the official plan has a line in it that basically tells the region of Waterloo they can take our land if THEY decide they want it. Considering how back handed and secretive they were already with our water and stealing farmland, that is just plain irresponsible to put in there. This is something that needs more time to review, and more clarity for the residents. Many of us don't go on websites, so maybe it's time to start looking in to more ways to engage everyone. I can tell you, we are not happy. Please reconsider, and please delay pushing this through. And maybe, just maybe, look at what us residents want…green spaces, parks, places to hang out peacefully. Not worrying our speedways, sorry, streets, are going to have 600 more cars.	The Plan acknowledges the Region's role in planning and maintaining infrastructure, such as regional roads, transit corridors, and water/wastewater systems. These policies are meant to make sure planning is coordinated between the Township and the Region, not to take away local decision-making authority. If you are able to identify the policy number you are referring to, the project team would be happy to review it to ensure there are no unintended gaps. The project team is preparing a feedback summary document that will be publicly available on the project's Engage page in the coming weeks to show how feedback was/was not incorporated throughout the process and this will also accompany the final report to Council for their consideration.

50 by 30, Citizens for Safe Groundwater, Grand River Environmental Network, GreenWR, Nith Valley EcoBoosters, Wilmot Civic Action Network

	Date Received		Township Response
1	21-Jun-26	The Draft 2 Official Plan is a plan for a MINIMUM population of Wilmot of 34,000 by 2051. This 6 is an increase of 12,000 people from the current population of 22,500. Furthermore, the Draft 2 7 Official Plan is for a minimum employment forecast of 12,000 jobs by 2051.	Wilmot is required to plan for a minimum population by the Province. Wilmot is planning to maximize the Waste Water Treatment Plant Capacity, and has introduced phasing policies to ensure new growth is supported by municipal infrastructure. The Regional Official Plan established a population growth target and designated residential land that has been incorporated into this plan as the most realistic growth scenario, balancing the low and high growth projections to a mid range forecast of 34,000 residents. The employment growth target reflects the Regional Official Plan target.
2	21-Jun-26	Draft 2 of the Wilmot Official Plan • Does not state a maximum population. • Weakens protection for the Countryside Line. • Weakens protection for prime agricultural land. • Does little to protect source water. Protection is provided for 100 metres radius around a 13 municipal well. We know from anecdotal well interference reports that the impact on 14 wells around K50 and K51 extend beyond 2,000 metres (yellow dots).	Wilmot is not permitted to establish a maximum population as part of its Official Plan. The Countryside Line policies are not weakened by the Township's Official Plan, but rather the provincial framework that guides growth and development and the new PPS. Wilmot Township has maintained to the best of its abilities the Countryside Line, in addition to applying a broader swath of land under the Prime Agricultural Land or Core Environmental Features designations to further strengthen protections, in consultation with OMAFA. In the revised draft OP, a strengthened Source Water Protection policy framework has been put forward in response to community feedback, regional consultation, and guidance from MECP and MNR.
3	21-Jun-26	Source water protection depends on the Regional Implementation Protection Studies which have proven to be inadequate.	This cannot be addressed through Wilmot's Official Plan, but rather the Region's policy framework.
4	21-Jun-26	Does not mention of Wilmot’s commitment to reduce corporate and community greenhouse gas emissions to 50% below 2010 levels by 2030, or to 80% by 2050.	Noted. The place for this policy is through a Community Energy and Emissions Plan

5	21-Jun-26	Weak values and principles will encourage OLT appeals. The Vision statement does not make the protection of farmland mandatory and section 8.2.c allows large scale wind turbine projects and solar farms on Prime Agricultural Areas.	Provincial protections of farmland, including the Prime Agricultural Area designation are a stronger policy framework than the values and principals section of the OP. Principals have been updated to include "Promote and support the continued growth and protection of the agricultural sector as a tourism, cultural, and economic pillar of the Township." Provincial policy enables the location of renewable energy on Prime Agricultural Areas. However the Draft Township Official Plan will not permit this type of development as of right, but rather require a zoning by-law amendment.
6	21-Jun-26	Only 20% of residential growth will be due to redevelopment. The current Official Plan is 30%. Why has this target been reduced?	The target was reduced based on the amount of already approved greenfield development. As a minimum target, the Township can exceed 20%, however there is no way to enforce this target.
7	21-Jun-26	Industrial intensification is now 20 job per hectare. The current Official Plan is jobs/hectare and the Regional Plan is 55 jobs/hectare. Why has this target been reduced?	The previous targets were region wide, the reduction better reflects the Wilmot context and likely market uptake of Employment Land development.
8	21-Jun-26	Growth exceeds infrastructure capacity. The growth target of 12,000 more people and jobs exceeds the capacity of the Baden / New Hamburg Wastewater Treatment Plant.	Section 8.4 Phasing and Coordination of Development addresses servicing capacity and will require development proponents to demonstrate available servicing capacity.
9	21-Jun-26	The Region of Waterloo 2025 Water and Wastewater Monitoring Reports shows a committed value of approximately 3,500 people for buildings that have been approved and are currently being built but they are not yet occupied. This commitment must be added to the population of Wilmot which results in an estimated population of 26,000.	The Township used the 2024 Water and Wastewater Monitoring report to support the projected growth calculation, as this figure did not include those draft approved but not yet occupied units, and then compared the growth forecast to the 2025 data. As such, the Baden New Hamburg Wastewater Treatment Plant should have sufficient capacity for growth to 34,000, especially with continued work on inflow and infiltration improvements.
10	21-Jun-26	The Wilmot Development Application Listing, as of April 20, 2026, showed 14 projects that total between 6,200 and 7,400 more people. If all of these dwellings are approved and built, the estimated population of Wilmot will be between 32,200 and 33,400 people.	Noted.
11	21-Jun-26	All of these applications were brought under the existing Official Plan and are not affected by this Draft. The Draft 2 is planning for a population increase of between 650 and 1,900 people to bring the population of Wilmot to 34,000.	Noted.

12	21-Jun-26	The Baden New Hamburg Wastewater Treatment Plant has a total capacity of about 28,000 people and there 15,100 people already connected to the treatment plant. If the commitments and Development Applications are connected to the treatment plant, the remaining wastewater capacity will be between 1,700 and 2,900 additional people.	Capacity of the plant is not fixed, especially with continued inflow and infiltration improvements over the time horizon of this Plan. The Official Plan has a policy identifying that "The Township, in collaboration with the Region, shall continue to develop programs which optimize use and efficiency of the Baden-New Hamburg Water and Wastewater Systems including, but not limited to continued annual investment in monitoring systems and programs to detect and repair areas of inflow and infiltration, and review current and improved technologies within the Baden-New Hamburg wastewater treatment plant." and that should capacity not exist "Development approvals may be subject to a Holding (H) provision in the zoning by-law limiting development until capacity within municipal water services and municipal sewage services is available." This means that no building permits will be issued without sufficient treatment capacity.
13	21-Jun-26	There is just enough sewage capacity to increase the population to a MAXIMUM of 34,000 with the commitments and what is on the Development Application Listings.	Noted, and subject to the same criteria as above. The Township does not have an ability to set a maximum population target. A full and comprehensive section on Water and Waste Water Servicing is contained in 8.4.
14	21-Jun-26	This ignores the increase sewage requirements from an additional of 12,000 jobs.	The number of net new jobs is 5000, and this number is included in the data and annual monitoring reports provided by the region. The Official Plan contains a policy commitment to continually adjust and monitor growth "Long-term capacity of the Baden – New Hamburg Water and Wastewater Systems shall be evaluated through the Township's Water and Wastewater Master Plan and the Region of Waterloo's Water and Wastewater Master Plans and Monitoring Reports."
15	21-Jun-26	In order to plan for more than 34,000 people, a plan, including costs, must be provided to increase sewage treatment.	Noted, and incorporated through phasing policies.

16	21-Jun-26	This document is in response to Draft 2 of Wilmot's Official Plan, released on May 14, 2026. Since the draft's release on May 14, we have compiled feedback from several community organizations, including: 50 by 30 Citizens for Safe Groundwater Grand River Environmental Network GreenWR Nith Valley EcoBoosters Wilmot Civic Action Network While this document does not represent a unanimous consensus among all groups, our feedback aligns with and supports the concerns raised by Wilmot residents. Wilmot residents have clearly stated their desire to maintain our small rural communities and protect our water and farmlands. However, there is a widespread consensus that this Draft Official Plan does very little to safeguard these values. Instead, it appears to favour massive growth without adequate regard for environmental impacts or the financial burden placed on taxpayers. The Official Plan is meant to guide the Township's growth for the next 30 years. We do not believe this draft reflects the vision or desires of Wilmot's residents. We urgently require a proper, collaborative review process that allows concerned citizens to sit down and work through this plan directly with our Councillors.	Noted. Where possible, changes and modifications have been made to the Official Plan to reflect the feedback provided. Especially as it relates to the vision and principles of the document.
17	21-Jun-26	The existing Official Plan was first approved by the Province in 2004, and subsequently amended in 2017, 2019 and 2024. In December 2024, the Province removed planning authority from the Region and a new Wilmot Official Plan is required to incorporate the functions previously performed by the Region. Official plans are a planning document to describe how lands in the municipality are to be used to ensure that future planning and development meets the needs of the community. According to the Province, official plans deal mainly with where new buildings will be located, what services (roads, watermains, parks, and schools) are needed, and how the community will grow. https://www.ontario.ca/document/citizens-guide-land-use-planning/official-plans Your municipality's official plan: - makes the public aware of the municipality's general land use planning policies - makes sure that growth is coordinated and meets your community's needs - helps all members of your community understand how their land may be used now and in the future - helps decide where roads, watermains, sewers, garbage dumps, parks and other services will be built - provides a framework for establishing municipal zoning bylaws to set local regulations and standards, like the size of lots and height of buildings - provides a way to evaluate and settle conflicting land uses while meeting local, regional and provincial interests - shows council's commitment to the future growth of your community. Note: Some of these functions are still the responsibility of the Region.	Noted. However, the Provincial Citizens Guide to Land Use Planning is a document that predates a number of significant Provincial Policy changes, as the document was created in 2019. Since then municipalities are required to work within a revised Provincial Planning framework.
18	21-Jun-26	By-laws that are passed by Council are to be aligned with the value statements in the Official Plan. A by-law can be appealed to the courts or to the Ontario Land Tribunal (OLT) if it is not substantiated by the Official Plan. The OLT is legally required to determine if the by-law in question is supported by the value statement in the Official Plan. If the by-law is consistent with the value statement, the appeal is automatically rejected. We believe the value statement is weak and it is critical to get the values statement correct. Although the Province has placed some restrictions on what can be done in a municipality, the Official Plan must reflect the wishes of the community and be able to defend by-laws at the OLT.	Noted, and revisions to the Official Plan vision statement have been made.

19	21-Jun-26	According to Bill 98, Building Homes and Improving Transportation Infrastructure Act, 2026, “non-urban-leader” municipalities must bring their newly updated, aligned Official Plans into full effect by January 1, 2029. The Provincial Government must approve Official Plans within 180 days of receiving them, therefore, plans must be submitted by October 1, 2028 at the latest. 171 There is no reason that the Official Plan must be voted on by this Council, and it may be appropriate to have the new Council vote on the Official Plan since they will have to implement it. Wilmot Council, on May 25, 2026, voted to take the time to do this right. We are not suggesting that we delay writing the new Official Plan as quickly as possible, instead we should not work to an artificial deadline. The Official Plan will set the direction for the Township until 2051.	The timeline for Wilmot's New Official Plan was determined by Council and Approved as an expense within the 2025/2026 Capital Budget. Council has provided the direction to complete this project within the 2022-2026 Council term.
20	21-Jun-26	Overall Synopsis The goal of the Official Plan is to remain a small, rural, agriculturally focussed municipality. However, it must now incorporate everything contained in the Regional Official Plan and we are concerned that this Wilmot Official Plan pales in comparison to other municipal Official Plans which are far more detailed, comprehensive, and provide a far better vision as well as much stronger plan for the future of their communities. This Wilmot Official Plan needs to set the stage for who we are, where we are going, how we will face pressing issues, and what we want to become for decades. We need to ensure that it will adequately prepare our municipality for the future and be the best possible document that we can create. Note: We have drawn extensively from the Woolwich and Wellesley Draft Official Plans	Noted, however the Official Plan is one document that sets policy for how land is used within the Township. A key writing principle for Wilmot's Official Plan is to streamline the policies contained within the Official Plan, and rely on other documents to serve their own purposes in alignment with Provincial direction, such as the Township's Strategic Plan, as well as a variety of other Master Plans.
21	21-Jun-26	The Official Plan must see us through climate change, the housing crisis, the water crisis, likely the next pandemic, and so much more. This is the document that will be left by us for our children, future Councils, future Staff and that OMB/OLT Members as well as Judges will use to interpret our intentions for legal decisions. We need to get it right and ensure that it says everything that it needs to. It is important to note that the Official Plan is a vision for our community for the next 25 years. The Official Plan is guided by the current Governments’ Provincial Policy Statement but the vision is not set by the government.	The Official Plan represents a "Made for Wilmot" approach to land use planning that is constrained within the Provincial Planning framework. Wilmot is required to be guided by the 2024 Provincial Policy Statement.
22	21-Jun-26	The Official Plan is one of the most important documents used when the Ontario Land Tribunal (OLT) reviews a planning decision that is being appealed. Under Section 24 of the Ontario Planning Act, the OTL determines whether the proposal matches the vision laid out in the Official Plan. "no by-law shall be passed and no public work shall be undertaken that does not conform therewith." Section 24(1) Ontario Planning Act. The importance of the vision statement is a clearly stated by the OLT and an appeal must show that a decision by Council contravenes the Official Plan otherwise the appeal will not proceed.	The Vision Statement is one piece of the overall Official Plan that is used when the OLT reviews a planning decision. A decision is not solely judged based on it's compliance with the vision statement of an Official Plan, but rather the entirety of the Plan as a whole and each of the policies contained within.
23	21-Jun-26	The Introduction is minimal and inadequate compared to most other Official Plans in the Region. This Official Plan needs to set the stage and ensure the context to be able to defend decisions from Ontario Land Tribunal (OLT) appeal and court challenges. It should also inform citizens, elected officials and others about our community, our ambitions, and our plans for the future. It should state size and population of township for current context. For example: The Township contains an area of approximately 33,819 hectares (83,569 acres) and a current population of approximately 22,500 . It should state what makes Wilmot Township special and what defines the character of our community.	Addressed.

24	21-Jun-26	The Wilmot plan does not appear to explicitly name, map or regulate the Waterloo Moraine as a distinct protected landform/water-resource system. It contains policies for Regional Recharge Areas, Significant Groundwater Recharge Areas, Highly Vulnerable Aquifers, Environmentally Sensitive Landscapes, source-water areas, and natural heritage features — but the Waterloo Moraine itself should be given clearer, more forceful policy recognition.	Not addressed, research done on the Waterloo Moraine has informed the basis of the policy framework Waterloo Region uses to protect the water-resource system. The most forceful policy protection Wilmot has at its disposal is the proposed Source Water Protection Policies, that have been updated in consultation with the Region, MNR, and MECP.
25	21-Jun-26	The Plan uses many soft terms such as “encourage,” “may,” “where feasible,” “should,” and “consider.” The Plan itself explains that “shall” and “will” are mandatory, while “encourage” and “may” require consideration but not necessarily compliance. This distinction matters. For high-value resources — groundwater recharge, moraine lands, prime farmland, wetlands, woodlands, and agricultural continuity — the Plan should rely more heavily on shall / will / must language.	Addressed where possible, in alignment with updated ministerial guidance.
26	21-Jun-26	The Plan often uses “avoid, minimize, mitigate.” That is good planning language, but in the context of prime farmland and the Waterloo Moraine, the Plan should be clearer that avoidance is the default, and mitigation is only acceptable in narrow, exceptional circumstances. Suggested principle: Within the inner boundary of the Waterloo Moraine, development and site alteration shall be avoided unless it is demonstrated that the use is essential, no reasonable alternative exists outside the Moraine, and no negative impact to groundwater recharge, discharge, water quality, water quantity, agricultural lands, or natural heritage functions will occur.	Updates to the Natural Heritage System policies have been made throughout Section 9, as well as introduction of requirements to demonstrate "no negative impact" where impacts may occur. The proposed principle was not included, see note about the Waterloo Moraine.
27	21-Jun-26	Given the very strong public feedback on the desire to maintain Wilmot’s rural character, Section 1.1 should specifically state the focus of maintaining rural character and remove the reference to supporting the Township’s evolving rural character. There is also nothing stated about the need for sustainability and the massive challenges ahead for Wilmot such as climate change and the need for increased resilience which needs to be a significant focus for this 30-year plan if our communities are to succeed.	Addition made about maintaining Wilmot's rural character. Setting out a long term plan for growth through an Official Plan is a tool for sustainability, although land use decisions are one piece of the overall structure. A more fulsome response to climate change would be appropriate in a Climate Action Strategy, not an Official Plan.
28	21-Jun-26	Note the definition of “consider” means that compliance is not necessary. This definition becomes critical in several areas of the Official Plan as noted in this document.	Addressed.
29	21-Jun-26	We have sufficient land already allocated to meet our growth targets through to 2050.	Map shown identifies a broader range of area than what is proposed to be allocated through this new Official Plan. The Township cannot preclude someone from filing an application, however the proposed urban boundary in this Official Plan designated less than is shown on the map in comment #14.

30	21-Jun-26	This states the Official Plan has incorporated the best of the Regions Official Plan (“ROP”) but what parts of the ROP policies that weren’t incorporated and the reason for ignoring them has not been stated. We need everything that was in the ROP that pertains to Wilmot to be incorporated into this plan and significant discussion/awareness of anything that we currently take for granted that isn’t being carried forward. The Waterloo Regional Official Plan (“ROP”) was the Official Plan of the Region of Waterloo, which is an upper-tier municipality that encompasses a federation of lower tier municipalities, including the Township of Wilmot. As of January 1, 2025, the Waterloo Regional Official Plan became a Local Plan of the Township of Wilmot as part of Provincial legislation that removed planning authority from the Region of Waterloo.	The Regional Official Plan set out a range of regional policies that have now been incorporated into the Township's Official Plan as they relate to Source Water Protection, the Natural Heritage System (renamed from the Greenland Network) and regional transportation policies. Wilmot specific regional policies were often carried forward, but areas where the existing Wilmot Official Plan provided better local context (such as the land use designations including Prime Agricultural Areas, Rural lands, and Neighbourhood Areas) were maintained.
31	21-Jun-26	#: 16 A vision statement is founded on what a community values, and outlines the Township's priorities and aspirations for the future that will ultimately guide the long-term growth of the community.	Addressed. Protecting farmland was incorporated into the first sentence of the vision statement.
32	21-Jun-26	#: 17 The vision statement must include the feedback from public engagements. Protecting Farmland was the number one concern of our citizens and yet the Official Plan weakens farmland protection.	The Official Plan's policies on the protection of farmland have been strengthened to better protect farmland, and the vision was revised.
33	21-Jun-26	#: 18 This Official Plan does not state any aspirations or anything about what we are striving for or hope to achieve. The values should include a statement about the importance water in our future. This should be our plan to protect our water and ensure future sustainability.	An introduction to the Principles section was added to clarify that these principles for the Official Plan were created based on community engagement throughout the creation of the Official Plan, and served as inspiration in the drafting of policies.
34	21-Jun-26	#: 19 Where is the protect of farmlands, water and the environment? Portions of the Wellesley and Woolwich Draft Official Plans are outlined below.	Vision and principals further strengthened to address and include source water protection, identify the environment through the Natural Heritage System, and added information about source water protection.
35	21-Jun-26	#: 22 Principles Why are there no guiding principles in Wilmot’s Plan?	Edit made to introduce the principles as guiding principals.
36	21-Jun-26	#: 23 Woolwich has 4 pages of goals to 2051, describing what they hope to achieve on each of the above areas making it very clear to citizens, developers, and others their intentions, ambitions, and focus. Wilmot needs to add the protection of our water supply and our farmland as a core principle. The Township must protect ground water sources since they provide most of the Township’s drinking water. Given that farmland is increasingly important for long term food security and for mitigation of the impacts of the climate crisis (i.e. carbon capture, flood control), the Township must permanently protect the countryside line to prevent any reduction in the amount of farmland through urban development.	Added policies to ensure the environment, farmland and water are protected. Provincial policy limits the availability of Wilmot to protect the Countryside line permanently. To address this, most of the land outside the Countryside line has been designated as Prime Agricultural Areas, which offers provincial protections for farmland.
37	21-Jun-26	#: 24 Section 3.8 of the current Official Plan (The Protected Countryside) must be carried forward in whole to the new Official Plan.	Provincial policy no longer supports the permanence of the Country Side Line. As best as possible, the Township has designated lands as Prime Agricultural Lands, which offers the highest level of farmland protection possible under provincial policy. The Countryside and Countryside Line have been carried forward as a part of the overall Township Structure.

38	21-Jun-26	#: 25 Considering the importance of protecting the Countryside Line, Chapter 6 should be included in the Wilmot Official Plan to strengthen protection of the Prime Agricultural Areas.	Response identified above, additionally, protections for Prime Agricultural areas have been strengthened in collaboration with OMAFA.
39	21-Jun-26	#: 26 Growth target of 12,000 additional people. The Draft OP does not specify how Wilmot determined there is sufficient infrastructure capacity for an additional 12,000 people. The 2025 Water and Wastewater Monitoring Report reports that there is capacity for 9,100 additional people at the Baden New Hamburg Wastewater Treatment Plant. Previous wastewater monitoring reports severely overstated the remaining capacity and the error was not corrected until this year. The 2025 Water and Wastewater Monitoring Report now includes a value for developments that have been approved but not yet occupied. This is the commitment of m3/d and is equal to approximately 3,500 people. However, the Township's Application and Development Listing is ignored by the Region so the actual capacity is substantially less than 9,100. The remaining capacity is probably closer to 2,000 or 3,000 additional people if all the developments on the Application Listing are approved and built. The Nith River is a Policy 2 river under Ontario's environment laws and "no further degradation is allowed". The Nith is also federally regulated under the Canadian Heritage River designation. It will be very difficult to expand the sewage treatment plant. The Nith River is functionally exhausted and any sewage beyond its current capacity will have to either be: • piped to Kitchener • treated with a new process (i.e.: biogas, digester, incineration) • dilute with ground or storm water. The Official Plan is a planning document. What is being planned to increase sewage capacity in order to accommodate 12,000 additional people?	The Township used the 2024 Water and Wastewater Monitoring report to support the projected growth calculation, as this figure did not include those draft approved but not yet occupied units, and then compared the growth forecast to the 2025 data. As such, the Baden New Hamburg Wastewater Treatment Plant should have sufficient capacity for growth to 34,000, especially with continued work on inflow and infiltration improvements. The Township is reliant on the Region's data, and will continue to monitor. No building permits will be issued without demonstrating sufficient water and wastewater availability.
40	21-Jun-26	#: 27 There is nothing in this plan about energy transition, net zero, or greenhouse gas emissions. There is very little about energy efficient buildings, or climate change. The previous Council committed Wilmot to reduce corporate and community greenhouse gas emissions by 80% below 2010 levels by 2050, regardless of population growth. We are increasing our emissions and we have already conceded that we are not going to achieve our 2030 goals. What is being planned to meet our greenhouse gas reduction target?	The province has limited the ability of planning documents to require anything related to building sustainability beyond what is contemplated by the Ontario Building Code. Setting an emissions target is beyond the scope of an Official Plan.
41	21-Jun-26	#: 28 The total lack of concern over global warming and the protecting of our environment is very troubling. Without energy and food security these plans mean nothing. Wilmot needs to make a statement regarding energy and food security. The Official Plan needs to include a very strong statement on the importance of reducing total greenhouse gas (GHG) emissions with a target of 80% reduction from 2010 levels by 2050. All new development applications in the Township must show the impact they will have on both corporate and community GHG emissions. The Township must incentivise developments with no natural gas connections to dwellings. The Township must incentivise developments with EV charging capability. The Township must track GHG emissions and report progress quarterly. The Township must produce an action plan to meet 2050 targets within one year of approval of the Official Plan.	This is something Council could consider outside of the Official Plan Process for a Climate Action Plan as that is more operationally suited.
42	21-Jun-26	#: 29 Compare this plan to Kitchener's Draft Official Plan. https://pub-kitchener.escribemeetings.com/filestream.ashx?DocumentId=35179 948 949 Kitchener has a whole section on Energy Transition as Kitchener recognizes the need to substantially reduce natural gas consumption to reduce the impact on climate change and reach net zero by 2050. Objectives: • Advance Kitchener's transition to a net-zero emissions, clean-energy community by 2050. • Generate and store more clean energy in our community. • Keep our utility costs low and our energy dollars in Kitchener. • Increase our community's resilience to a changing climate, especially for residents that are most vulnerable. • Share in the economic benefits, developments, and job creation of the energy transition, especially for low-income residents. • Reach a net-zero operational standard for new buildings and minimize carbon emissions from construction. • Support the transition of existing buildings to become low carbon and climate resilient. • Leverage opportunities to use waste heat from sources like industry, wastewater, or data centres as a resource to heat buildings. • Reduce air pollution caused by burning fossil fuels. Section 5 further explains the need to switch away from carbon fuels and create clean renewable energy locally.	The Province has made their expectations around the planning process clear. Kitchener's Draft Policies have not received Provincial Approval.

43	21-Jun-26	#: 30How is the Township going to deal with the increase in services due to population growth? Some services will be provided by the Region but land and infrastructure will need to be provided by the Township (land for health care space, schools, police). In addition, local roads, fire, water delivery, etc., are the responsibility of the Township.	Alongside population growth, the Township will maintain an ability to collect both development charges and property tax assessment growth from new development to deal with the increase in services.
44	21-Jun-26	#: 31 Note: Consideration means compliance is not necessary We suggest the introduction be rewritten: The Township of Wilmot is committed to early and meaningful engagement with Indigenous communities to facilitate knowledge-sharing and ensure Indigenous interests inform land use planning processes.	Addressed.
45	21-Jun-26	#: 32 What is the process?	The process differs by Indigenous community, when an applicant comes forward the Township provides a list of Communities and contacts to enable outreach.
46	21-Jun-26	#: 33 What does early mean? Does 'environmental assessments' include archaeological studies and assessments	Early means as applications come forward to the Township. Archeological Assessments added, and there is a specific policy requiring Indigenous Engagement on Archaeology in Section 9.
47	21-Jun-26	#: 34 The lands and waters on a reserve are governed by Indigenous people. Why are they responsible in equal parts with the Township/Region/Province?	Lands on a reserve are not governed by the Township Official Plan.
48	21-Jun-26	#: 36 What is the plan for artifacts that may be found?	This is governed by the Province of Ontario, and the Indigenous nations.
49	21-Jun-26	#: 37 It's all very nice to pay lip service to the statements regarding Indigenous Engagement from the First Nations Guidance on Land Use Planning, but how does the Township actually intend to incorporate Indigenous wisdom in land, stewardship and, use planning to protect our water and our land from over development?	In accordance with Provincial Requirements.
50	21-Jun-26	#: 38 The Township of Wilmot Council adopted the inclusion of a territorial acknowledgement statement to be read at Council Meetings. "We have gathered in Wilmot Township on the traditional territory of the Neutral, Anishnaabeg (u-nish-a-nah-bey) Haudenosaunee (ho-din-a-son-ni) and Mississauga peoples. We also want to acknowledge the importance of The Dish with One Spoon Covenant - a peace agreement made between Indigenous nations before the Europeans arrived. It characterizes our collective responsibility to each other and Mother Earth - we should take only what we need, leave enough for others and keep the dish clean. By acknowledging this covenant and the First Nations, Métis and Inuit, we are reminded of our important connection to this land where we live, learn and work together as a community." There is very little in the Draft Official Plan to ensure the dish will never be empty. We need to take care of the land, the wetlands, the water, the forests, and our farmland to create a long-term, healthy and sustainable environment, while honouring sites and artifacts.	The Township has received feedback that this territorial land acknowledgement should be reviewed. The place for this review is a broader community conversation than simply the Official Plan. As such, a provision has been made in the Official Plan that identifies the land acknowledgement may be updated without an Official Plan Amendment.
51	21-Jun-26	#: 39 According to the 2025 Water and Wastewater Monitoring Report, the New Hamburg / Baden Wastewater Treatment plant has a capacity of 28,000 people. How does the Township intend to pay for the increase in sewage treatment capacity without increasing taxes. All development must be within the capacity of Township services and infrastructure (e.g. water and sewage) and support a long-term healthy environment.	Any development beyond the capacity of the Water and Waste Water Treatment Plant will be subject to a holding provision until such a time as capacity is available.
52	21-Jun-26	#: 40 The "New Official Plan, Water and Wastewater Servicing Report, Background Report" Wilmot Township_OPR_Water_and_Wastewater_AODA.pdf uses the 2023 review by the Region to determine the sewage capacity. The reports from 2021 to 2024 do not include any buildings approved but not yet occupied or any dwellings on the Wilmot Development Application Listings and therefore do not account for already committed capacity.	Following the publication of the background report, both the 2024 and 2025 Regional Figures were reviewed to determine the appropriate growth target. Ongoing monitoring of regional data is included as policy within the Official Plan.
53	21-Jun-26	#: 41 The Employment Lands already designated in the Township are about 275 hectares. At 20 jobs per hectare, this represents 5,500 jobs. It appears the 12,000 jobs was calculated using the old employment density of 40 jobs per acre. Either the employment density, the number of jobs, or the amount of employment lands need to be corrected in order for the Official Plan to be coherent.	Addressed.

54	21-Jun-26	#: 43 We have and need very real limits to growth! This document is not reflecting the tone of concern about too much growth that is already widespread throughout Wilmot. We need to moderate development and not encourage unchecked growth. Growth must be curtailed by our water supply, our sewage treatment and the protection of our farmland. We know the current wastewater treatment capacity is about 6,500 to 7,000 people. What is the cost to existing taxpayers to increase treatment capacity for 12,000 people? Minimum growth targets gives the Township flexibility, but from a farmland and moraine- protection perspective, it also creates risk. If growth targets are treated as floors rather than realistic planning limits, pressure may build for more expansion, more servicing, and more conversion of rural land.	The plan for growth is predicated on available land and Water and Waste Water Capacity in Wilmot, and reflects a realistic forecast for the Township by 2051.
55	21-Jun-26	#: 44 There should be a statement to focus on intensification targets, sustainable growth, and reduce urban sprawl. We are constrained by our water supply and wastewater treatment capacity. The capacity numbers must be clearly stated as we know that Township planning has been based on wastewater treatment capacity that has been consistently overstated by the Reion.	Noted. There are intensification targets established by the plan. To focus more on intensification would result in planning for more growth than land has already been designated for.
56	21-Jun-26	#: 45 Where is the discussion on energy-efficiency, resiliency, low-carbon, compact built form, modal shift, complete neighbourhoods? We need to be mentioning the need to reducing GHG and air pollution. This Official Plan should be talking about our community preparing for extreme heat, increasing rainfall, increasing frequency of extreme weather events, and other impacts of a changing climate. There should be mention of the need for green infrastructure, low impact development and acknowledging the future is going to have to be different than the past. This Official Plan should be promoting better building designs, renewable energy, conservation, alternative and net-zero energy systems, high performance building standards. Additional items that need to be included in this Wilmot Official Plan include: - Maximizing tree canopy, shaded areas and community greening. - Supporting the energy transition off fossil fuels and increase energy resiliency. - Protection of the natural environment, the Nith River and tributaries, surface water and groundwater protection. - Affordable housing, housing options and housing choice, accommodating citizens at all stages of life. - Cultural heritage, adaptive reuse of buildings. - Improving accessibility for all ages and abilities, well-being of all children, youth and seniors. - Avoiding land use patterns that may pose a risk to public health, safety and the environment. - Ensures high quality urban form and design, vibrant public realm - Improving citizen access to: - transportation options, including active transportation, - public service facilities, community hubs, - safe, publicly accessible parts, trails, greenspace and recreation, - healthy, local and affordable food options – local farming and food production. - A mobility plan for citizens. The Township must prioritize the creation of “15 minute neighbourhoods” where people can meet most of their daily transportation needs by walking, cycling, or rolling. The Township must continue to work with the Region of Waterloo to ensure the availability of public transit in existing and new developments. Given the rapidly growing use of e-bikes, the Township must provide appropriately sized paved shoulders on urban streets and Township roads for active transportation.	The Official Plan speaks to many of these same objectives, but the implementation is better served by other plans and strategies within the Township. Transit and active transportation policies in the plan have been enhanced in collaboration with the region.
57	21-Jun-26	#: 46 Sustainable growth should not simply mean “growth with mitigation.” In Wilmot, sustainable growth must mean growth that does not consume the very farmland, groundwater, and rural systems that make the Township viable. The Plan needs firmer rules around where growth cannot go.	Through the Township Structure clarity is provided about where growth is set to occur. The predominant focus for Growth in Wilmot Township is the Urban Areas of Baden and New Hamburg.
58	21-Jun-26	#: 47 The Countryside Line must be permanent	Provincial policy no longer supports the permanence of the Country Side Line.

59	21-Jun-26	#: 49 The use of Prime Agricultural Areas and Rural Areas is confusing since, according to glossary, Rural Areas include Prime Agricultural Areas but Section 7 does not. What is the significance of separating out Prime Agricultural Areas from Rural Areas?	Clarified in the plan. Prime Agricultural Areas have significant protection under the Provincial Policy Statement, whereas there is more flexibility for severances in Rural Areas. If something is designated as Prime Agricultural Areas, it is the highest level of protection the Province permits.
60	21-Jun-26	#: 50 We suggest rewriting These agricultural policies are intended to permanently protect these valuable areas from urban development, while providing for the continued use of the lands for agriculture, environmental and other appropriate rural uses, As These agricultural policies are will permanently protect these valuable areas from urban development, while providing for the continued use of the lands for agriculture, environmental and other appropriate rural uses,	Not addressed. The intent of the policy is an important test for land use decision making, and therefore important to the protection of these areas from urban development.
61	21-Jun-26	#: 51 Prime Agricultural Area and Rural Area designations are confusing as this does not allow for settlement areas. What are negative impacts and why are they allowed?	The Prime Agricultural Area and Rural Area designations are separate from the Rural Settlement Areas. To allow for the creation of a new Rural Settlement Area, a Settlement Area Expansion application would be required to be filed. The Township does not intend to designate any new Rural Settlement Areas. Policies for existing Rural Settlement Areas (to recognize the existing land uses) follow this section.
62	21-Jun-26	#: 52 The Province defines what is allowed on Prime Agricultural Land. Remove 'as appropriate' and reference the "Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas" https://www.ontario.ca/files/2024-04/omafra-publication-851-guidelines-on-permitted-1347 uses-in-ontarios-prime-agricultural-areas-en-04-02-2024.pdf	This policy document is referenced elsewhere in the Official Plan.
63	21-Jun-26	#: 53 It is confusing for non-planners. Is it possible to use a consistent nomenclature? Map A3-1 and A3-2 uses • Mixed Use - Urban Core (not referenced in draft 2) • Mixed-Use Commercial Areas (not referenced in draft 2) • Mixed Use (identified as residential, light industrial, commercial in Baden and New Hamburg) •Neighbourhoods - Urban (not referenced in draft 2) Maps A3-3, A3-4, A3-5, A3-6, A3-7, A3-8, A3-9, A3-10 uses • Neighbourhoods - Rural Settlement Area (not referenced in draft 2) • Mixed Use - Rural Settlement Area (not referenced in draft 2) • Rural Settlement Employment (not referenced in draft 2) Please change the maps to use the wording in the Official Plan or change the Plan to match the maps.	Noted. The name on the map is consistent with the provincial standardizing.
64	21-Jun-26	#: 54 What is the minimum fragmentation size? Is this different from the Provincial minimum of 40 ha?	40 hectares, consistent with the provincial minimum.
65	21-Jun-26	#: 55 Prime Agricultural Areas are protected by the Province's Agricultural Impact Assessment and the Guidelines on Permitted Uses. Why is this Plan attempting to re-write the rules for Prime Agricultural Areas?	It is not, it is implementing them in consultation with OMAFA. Changes have been made to the Prime Agricultural Areas to closer align with provincial direction on farmland protections.
66	21-Jun-26	#: 56 The Plan says settlement expansions are not anticipated and will only be considered through a comprehensive update. However, it should go further by saying that settlement expansion into the inner boundary of the Waterloo Moraine should be prohibited, except for extremely limited public infrastructure that cannot reasonably be located elsewhere and that demonstrates no negative hydrological impact.	The Township does not have an ability to prevent landowners from filing an application. The language was tightened by the Province upon review, and is as strong as Wilmot has an ability to implement.
67	21-Jun-26	#: 57 What sort of future needs are anticipated?	None at this time, but could include parkland, or minor infrastructure works.
68	21-Jun-26	#: 58 Section d) could contravene the Guidelines on Permitted Uses. Why is this being proposed?	It is required. This adds an additional policy layer for Rural Settlement Area Expansions in addition to the core Settlement Area Expansion Policies.

69	21-Jun-26	#: 59 Accommodate residential growth without expanding into the Prime Agricultural Areas.	No expansion for residential growth onto Prime Agricultural areas is contemplated at this time.
70	21-Jun-26	#: 60 What is the definition of affordable? If housing is purchased at affordable rates, is the home owner restricted from selling the property at market rate? How long will rental properties stay affordable?	The definition of affordable is included in the Glossary and aligns with the Provincial Policy Statement. The Township does not have the ability to require affordability as part of new developments.
71	21-Jun-26	If a density target is required (see section 4.7), then it should be up to the developer to decide what needs to be built to achieve the target. Specifying the mix of dwelling type is not necessary.	This policy is being brought forward from the Regional Official Plan, to drive a trend towards higher density development types, rather than all single detached homes in greenfield communities.
72	21-Jun-26	#: 62 Why is Waterloo Economic Development Corporation in the Official Plan? What has Waterloo Economic Development Corporation done to justify the $50,000 that Wilmot pays them annually.	Revised to remove the specific reference in favour of collaborating with local partners, which could include a broader group of organizations.
73	21-Jun-26	#: 63 Waterloo Economic Development Corporation is NOT MENTIONED in the Official Plans for Woolwich, Wellesley, Waterloo or Kitchener. Why are they in Wilmot's? Note: we could not find the Cambridge OP and North Dumfries have not yet published their plan. Wilmot pays Waterloo Economic Development Corporation $50,000 per year. The inclusion of Waterloo Economic Development Corporation in the Official Plan will cost Wilmot $1,250,000 unless the Province agrees to review the Official Plan before then.	Noted, and revised.
74	21-Jun-26	#: 64 Why the Region and Waterloo Economic Development Corporation involved in identifying strategic sites? All they have done so far is destroy farmland and potentially created a huge tax burden to update Township infrastructure.	Noted.
75	21-Jun-26	#: 65 Employment Lands must be located within the Settlement boundaries (Schedule A1)	Noted.
76	21-Jun-26	#: 66 GHG emissions, water and sewage should be part of the decision.	The Township cannot regulate Greenhouse Gas Emissions through an Official Plan.
77	21-Jun-26	#: 67 Does this apply to companies that have restrictions by their trade associations? (eg: 1595 Nachurs Alpine and the sub-division exclusion zone set by Fertilizer Canada.)	Yes.
78	21-Jun-26	#: 68 Both Woolwich and Wellesley drafty Official Plans have a density target of 50 people or jobs per hectare. For reference, urban centres are typically between 70 and 200 people per hectare	Through previous provincial decisions, the amount of new residential land has already been determined. The 45 persons and jobs per gross hectare better reflects Wilmot's existing designated context.
79	21-Jun-26	#: 69 The current Official Plan has a target for redevelopment of 30%. Reducing the target to 20% will increase the amount if greenspace used by new development.	Noted. Though the amount of urban residential land has already been predetermined.
80	21-Jun-26	#: 70 The current Official Plan has a minimum density of 40 job per hectare. Why has this been reduced to 20 jobs per hectare?	To better reflect Wilmot's rural employment context. As a target this number is not binding, but it would not preclude its being exceeded.
81	21-Jun-26	#: 71 We have enough land allocated for the population forecasts to 2051. There is no need to expand the settlement areas.	While the current Official Plan designates land to 2051, Provincial legislation requires that an application to expand the urban area can be filed at any time. As such, it is important to have settlement area expansion policies within the Plan.
82	21-Jun-26	#: 72 Add "permanent" to Countryside Line.	Provincial policy no longer supports the permanence of the Country Side Line.

83	21-Jun-26	In identifying a new Settlement Area or permitting a settlement area boundary expansion, the Township shall evaluate the following through a comprehensive community planning process prior to designating new Settlement Areas or settlement area lands:	Addressed.
84	21-Jun-26	#: 74 1681 1682 SECTION 4.8.b MUST BE DELETED Once the Province forces a zone change on the 770 acres and a sewer pipeline to Kitchener is built, this section will allow developers to go the OLT and demand more land in Wilmot be opened up for development and there will be nothing that future Wilmot Councils will be able to do to stop the destruction of farmland. This is not what Wilmot residents want.	Not addressed. It is important that the Official Plan contains policies regarding settlement area expansions in the event an application is filed.
85	21-Jun-26	#: 75 Note: original has incorrect numbering.	Addressed. Thank you.
86	21-Jun-26	#: 76 Economic development must include a reference to water conservation and aquifer capacity.	Not addressed. Section 9 of the Official Plan contains a more robust approach to water conservation and source water protection that applies to all sites, not just the economy and employment areas.
87	21-Jun-26	#: 77 Employment Areas must be located within the Settlement Area boundaries	Noted, this is reflected in the Official Plan.
88	21-Jun-26	#: 78 "… primarily serve vehicular traffic". What about walkability?	This area is the former Highway Commercial Designation, while the area transitions towards a mixed-use built form, the highway adjacent nature of this type of development somewhat precludes walkability.
89	21-Jun-26	#: 79 Need to state "significant quantities" of water and wastewater in terms of volume. If the volume is limited to 50,000 litres per day, the Provincial Permit to Take Water cannot be used to by pass restrictions on water use.	Not addressed. These areas contain existing dry industrial uses, and are not contemplated for significant growth.
90	21-Jun-26	#: 81 Note: Prime Agricultural Areas are within the Countryside Line. How does this apply to sections 4, 5, 11, 17, 18, 19 and 20 on the map?	Through a comprehensive municipal review and provincial approvals, areas have been redesignated out of the Prime Agricultural Areas designation. Outside of the Countryside Line, most lands remain designated as Prime Agricultural areas in consultation with OMAFA.
91	21-Jun-26	#: 82 Allowing expansion of petroleum use is now considered an international wrongdoing by the International Court of Justice, (July 23, 2025), to which Canada is a signatory. Including the possibility of expansion of petroleum exposes the Township to liabilities and possible reparations.	Policy deleted.
92	21-Jun-26	#: 83 Define limited. Add: v) the limited non-residential use is required for food or water security for the Township.	Limited, with the aim of referring to churches, cemeteries, and other institutional or infrastructure uses. The proposed policy was not incorporated as those limited uses could not meet that policy objective.
93	21-Jun-26	#: 84 Is the 770 acre mega-site considered a "limited non-residential use	A mega-site would not be considered a limited non-residential use.
94	21-Jun-26	#: 85 The Plan permits mineral aggregate operations as an interim use in Prime Agricultural Areas, subject to policies and rehabilitation. It also allows new mineral aggregate operations in Environmentally Sensitive Landscapes where studies demonstrate no adverse impacts and allows extraction below the water table if hydrogeological cumulative impact assessments satisfy the Township and agencies. This may be consistent with provincial aggregate policy, but it creates real risk in a groundwater-sensitive township. Rehabilitation does not always restore pre-existing hydrogeologic function, and "no negative impact" tests can be highly dependent on assumptions, modelling, monitoring, and enforcement.	The Township aimed to preserve the existing framework for Mineral Aggregate Resources as part of this plan, and has received significant Provincial feedback on the current approach that Wilmot must be consistent with provincial policies. No negative impact policies have been further introduced into this plan for Mineral Aggregate Resources.

95	21-Jun-26	#: 86 Most of Wilmot, except the Settlement Areas, is Prime Agricultural Area lands. Is there a map of Rural designation? What is the Core Environmental Features overlay?	The Rural Area designation is displayed on Schedule A-1. There are very limited areas of the Township designated Rural Areas (near Petersburg, south of Baden, etc.).
96	21-Jun-26	#: 87 Add to p): with priority given to maintain the Prime Agricultural Area designation	Policy revised to identify that only the Township may request lands out of the Prime Agricultural Area designation from the province.
97	21-Jun-26	#: 88 Need a definition of small-in-scale	This applies to a very limited geography (only on rural lands) within Wilmot.
98	21-Jun-26	#: 89 This allows a pipeline to Kitchener and pumping equipment to be built on farmland. Why are alternatives not considered first (i.e.: road right of ways)	It does not.
99	21-Jun-26	#: 90 Considering the importance of groundwater, there MUST be a limit on the Permit to Take 2053 Water for golf courses.	Wilmot is not permitted to limit permits to take water that have been granted by the province.
100	21-Jun-26	#: 91 Note: Consideration means compliance is not necessary We suggest rewriting: “An agricultural development application is required and will be evaluated on the following:”	Language changed. This is a policy designed to support the rural economy.
101	21-Jun-26	#: 92 These areas must be on the urban side of the Countryside Line and avoid destroying farmland. Transportation must include active transportation.	Noted. Active transportation addressed.
102	21-Jun-26	#: 94 Accommodate roundabouts. Add “where appropriate”.	Addressed.
103	21-Jun-26	#: 95 What is “major traffic generators” and what is suitable access?	Traffic Impact Studies required as part of a development application will identify major traffic generators and identify potential solutions for suitable access prior to development.
104	21-Jun-26	#: 96 New roads must not divide farms or prevent normal farm transportation requirements for feed mills, nutrient management, or milk pickup. Furthermore, emergency services must not be affected.	Noted.
105	21-Jun-26	#: 97 There is no legal requirement for grade separation for trains travelling less than 177 kph.	Noted. Policy encourages grade separation, but does not require it.
106	21-Jun-26	#: 98 What does encourage mean? Who is going to pay for the land necessary for the access. As much as we do not want to talk about the 770 acres, the mega- site will need a rail spur through the designated employment lands to reach CN North. To build a highway 7/8 bridge over the rail spur is expected to cost $60 million. Who is paying for this? We should insist that companies who need rail access build adjacent to CN North (like Nachurs Alpine).	Comment is beyond the scope of the Official Plan, aside from encouraging rail service to employment lands.
107	21-Jun-26	#: 99 Existing right of ways should be used for railway lines although it may be necessary to expand the right of way to accommodate addition lines. However, no associated yards, sidings, shunting areas will be allowed in prime agricultural areas.	Noted.
108	21-Jun-26	#: 100 Noise levels should specify standard measurement procedures (i.e.: height of meters, distance to target, calibration standard, etc.) Noise level should be specified at the property line.	Provincial noise guidelines are the appropriate venue to address this comment.

109	21-Jun-26	#: 101 However, specific times periods and noise levels should not be specified in the Official Plan as it will take an Official Plan Amendment and approval by the Province to change the criteria. These should be specified in a by-law. Furthermore, why is there not a noise limit for all dwellings, not just those in Noise Sensitive Lands. Noise Sensitive Lands are not defined, but the provincial definition has 4 classes of Noise Sensitive Lands. Which class does this apply to?	Noted. The dBA standards are spelled out by the Province and identifies when warning clauses would be required. There is a noise limit for all dwellings. " Where projected noise levels exceed the noise criteria shown in the table below, appropriate noise warning and/or noise attenuation measures will be required prior to, or as a condition of approval of the development application in accordance with the provisions of Provincial or Regional noise guidelines. Such measures may include site design and building layout, noise warning clauses, noise attenuation barriers, air conditioning, and/or structural design measures such as multiple glazed windows and brick wall construction. Notwithstanding the above, sensitive land uses will be prohibited where the projected attenuated daytime noise level in the associated outdoor living area exceeds 70 dBA." This addition to the Official Plan was requested by the Region.
110	21-Jun-26	#: 102 The Wilmot Official Plan says nothing about energy conservation, encouraging renewable energy, the required transition from fossil fuels, climate change, the need for municipal leadership on climate change or resiliency and innovation, etc. Suggested wording from Woolwich:	The Official Plan does contain a section for Energy Conservation.
111	21-Jun-26	#: 103 There needs to be something about EV charging infrastructure, especially for any development that has on street parking or a parking garage.	The Provincial government has recently curtailed the ability of municipalities to require EV Charging infrastructure in new developments through planning policies.
112	21-Jun-26	#: 104 The Wilmot Draft Official Plan is also missing important sections on: - Air Quality - Urban Forestry - Local Food Production/Agriculture - Clean energy production - Aquifer capacity conservation	These requirements are contained throughout the agricultural policies, urban design policies, and renewable energy policies. An Official Plan cannot regulate Air Quality.
113	21-Jun-26	#: 105 Prime Agriculture Designation is not defined but if means Prime Agricultural Areas, then large scale projects should be not permitted.	Provincial policy requires contemplation of these projects. They will not be permitted "as of right" but rather through a zoning by-law amendment process on a site specific basis.
114	21-Jun-26	#: 106 “Prime Agriculture Designation”, “Mixed Employment Designation” and “Employment Area 2599 Designation” are not defined. Since they are capitalized, they will have legal meaning that needs a definition.	They are the designations as mapped. Will ensure names and titles are harmonized.
115	21-Jun-26	#: 107 Wind turbines, solar farms and other renewable or alternate energy facilities MUST have some restrictions. Furthermore, wind turbines, in particular, are problematic. (noise, vibration, lights, abandoned towers) The Ontario Federation of Agriculture opposes the use of prime agricultural land to site industrial-scale energy generation and storage projects. https://ofa.on.ca/resources/industrial-wind-turbines/ In 2024, the Provincial government explicitly prohibited the Independent Electrical Systems Operator (IESO) from issuing contracts for ground-mounted solar projects on prime agricultural areas. Every flat roof and parking lot in Wilmot should be covered with solar panels before any solar is installed on Prime Agricultural Areas. There is no objection to placing solar along fence rows and laneways but farmland must not be used for large-scale solar farms.	They are restricted, in that they will require a zoning by-law amendment and a public process to be established.

116	21-Jun-26	#: 108 The type of renewable energy projects should not be specified. Currently there are 159 municipalities in Ontario that have formally declared themselves “unwilling hosts” to new industrial wind turbine projects. https://www.windconcerns.com/ontario-booms-with-municipalities-rejecting-big-wind If wind turbines are not suitable for Wilmot, we will be unable to stop them once they are written into the Official Plan without an amendment and Provincial approval.	Noted - any application will require a zoning by-law amendment.
117	21-Jun-26	#: 109 Define large scale	This will be done through the Zoning By-law.
118	21-Jun-26	#: 110 f) Is this for large-scale renewable or alternative energy or is this meant to apply to a small roof top system? Specify size in kW.	For both, it provides the policy foundation for the Township to implement zoning restrictions or permissions for renewable energy.
119	21-Jun-26	#: 111 From the Wilmot Township website: In November 2017, the Township of Wilmot made a commitment to reduce greenhouse gas emissions (GHG's) by 25% by the year 2027 and 80% by 2050. This commitment has made the Township a "pledging partner" within the Regional Sustainability Initiative. Where is the commitment to reduce both corporate and community greenhouse gas emissions in this plan?	A Community Energy and Emissions Plan is a more appropriate venue for this type of commitment, rather than the Official Plan.
120	21-Jun-26	#: 112 Wilmot is missing the opportunity and should include a section on Climate Change Resilience. Here’s Woolwich Townships wording as a suggestion:	The entirety of the Official Plan responds to a changing climate. A specific Climate Change Adaptation Plan is a more appropriate venue for the proposed Woolwich text addition.
121	21-Jun-26	#: 113 The section on water conservation needs to be strengthen. The Township recognizes that the provision of an adequate and assured supply of potable water is a necessity to all residents of the Township and the Region and that although supply of water is a Regional responsibility, the Township will, through its representatives at the Regional level, strive to assure such supply. Such supply shall also meet Fire Underwriters Survey 2020, as amended. The Township will encourage Regional authorities to study and consider the possible effect of lowering water tables on the agricultural economy prior to developing new sources of underground water taking in the Township. The Township will discourage future development (particularly industrial), which will require excessive amounts of water in its operation and/or discharges high volumes of wastewater. The Township will encourage and support water conservation and water use efficiency practices particularly in the fields of reduction of consumption, avoidance of wasteful practices and water recycling. This may include educational initiatives and leadership in municipal governance and corporate culture. The Township, when considering development proposals in areas where a municipal water supply is provided, will ensure that both the Regional supply and Township distribution system infrastructure can adequately support the proposed development. The Township will consider the approval of development applications with respect to wastewater servicing in accordance with the policies of this Plan, based on the following order of priority: i. The extension of servicing from a municipal wastewater system is required within Township Urban Areas and Urban Areas unless a site specific policy states otherwise and is the preferred form of servicing within other settlement areas ii. Where servicing from a municipal wastewater system is not available, planned or feasible new individual private wastewater treatment systems may be used provided that the site conditions are suitable for the long-term provision of such service with no negative impacts, except where such systems are not permitted in accordance with policies. In settlement areas, individual private wastewater treatment systems may be used for infilling or minor rounding out of existing development; and iii. Where a development application proposes the use of private wells to supply potable water, only drilled wells with appropriate surface casing will be permitted. The Township shall work with the Region to reduce inflow and infiltration in wastewater systems as much as possible. Developments that are proposed in proximity to wastewater treatment facilities are required to establish appropriate setbacks or buffer areas, in accordance with Provincial guidelines. The Township shall promote the safe and effective maintenance of private wastewater systems to protect groundwater and surface water quality.	Two polices added to the Water Conservation section to Strengthen this section.

122	21-Jun-26	#: 114 The way we build our communities impact stormwater runoff and infiltration, as a higher proportion of paved and impervious surfaces with less vegetation will increase runoff and decrease infiltration. Increased stormwater runoff has negative impacts on water quality and quantity, infrastructure, the environment, and can lead to increased flood frequency and erosion. Changing weather patterns and increased extreme weather events as a result of climate change will exacerbate these risks. The policies of this Plan promote a sustainable and integrated approach to stormwater management that minimizes the impacts on our community, infrastructure, and environment, and responds to the impacts of climate change. New multi-residential buildings will be encouraged to include rainwater harvesting systems for water reuse and stormwater management. The Township shall encourage areas with reduced impervious surfaces and maintenance of natural vegetated areas in order to minimize stormwater volumes, reduce contaminant loads, and adapt to the impacts of climate change.	Noted. This is addressed through the introduction of Low Impact Development techniques and the requirements for stormwater management plans.
123	21-Jun-26	#: 115 Forecasts must include the dwellings on the Townships' Development Application Listing, as well as approved developments that still under construction.	Noted. These applications have been included in the Township's planning framework.
124	21-Jun-26	#: 116We are curious to know what other option there are for wastewater treatment other than building a pipeline to Kitchener. Who pays for a pipeline? Are scope 3 emissions considered?	The Province has opened the door to alternative or private servicing solutions. This approach is not preferred by the Township, and the policy framework has been developed to identify that Municipal Services are the preferred option in settlement areas.
125	21-Jun-26	#: 117 Note: Consider means compliance is not necessary We suggest rewriting k) Plan infrastructure services to accommodate the Township's long-term population growth and increasing density.	Addressed.
126	21-Jun-26	#: 118 How are long-term provisions made when the Region can take as much water as they want?	This policy has to do with managing private services, not Regional services.
127	21-Jun-26	#: 119 Section p) should be deleted How can settlement areas be expanded if there no water or sewage? Settlement areas cannot be expanded if they encroach on Prime Agricultural Areas.	This is an important policy to maintain as it limits applications for settlement area expansions.
128	21-Jun-26	#: 120 What is the definition of "Major Recreation"	It is the land use designation that applies to Parks and Open Spaces, such as the Wilmot Rec Complex, as opposed to parks and open spaces that are less intensive uses of land.
129	21-Jun-26	#: 121 What will be done to maintain, enhance, restore the Nith River. According to the GRCA, the Nith is heavily polluted with phosphorus and nitrates. "Total coliform and E. coli bacteria counts frequently spike above provincial guidelines for recreational waters."	Nith River added to the policy framework as well.
130	21-Jun-26	#: 122 Forest cover is 22% of the land area in Wilmot and totals 14,430 acres. An 8% increase is 1,150 acres. What lands have been designated for this?	The Wilmot Tree Canopy Policy Framework, 2023 outlines the corporate strategy to increase canopy cover. Native Plantings are also encouraged as part of new development.
131	21-Jun-26	#: 123 Environmental Impact Statement must be defined in the Glossary. Furthermore, the expectations for the scope and scale of an EIS must be clearly defined. It also should be noted that Wilmot has changed the wording from the Regional Official Plan from an Environmental Impact Statement to an Environmental Impact Study. What is the differences between the ROW Statement and the Township's Study. A quick review of the ROE OP suggests that the requirements of the Township Study has been lessened. Why has the ESLs being downgraded?	An environmental impact statement or study must be done by a Qualified Professional, and is defined through the Regional Implementation Guideline for the Greenland Network. This Guideline will be brought forward in an updated manner for Council consideration. The study or statement requirements have not been downgraded. The words are used interchangeably, and have been updated to say "study" in all cases. Policies have also been updated to require the demonstration of "no negative impact".

132	21-Jun-26	#: 126It appears that Provincial mapping was used to generate C1 and C2. However, GRCA mapping shows a more complex system as GRCA includes: • Wellhead Protection Areas • Wellhead Vulnerability• Significant Groundwater Recharge Areas • Intrinsic Vulnerability (the natural, inherent vulnerability of an environment to suffer harm) The GRCA map looks like this:	Mapping is being updated to address this.
133	21-Jun-26	#: 127 A map of the GRCA designated wetlands should added as a schedule:	Mapping is being updated to address this, but will not be added as a schedule.
134	21-Jun-26	6 v) is the only mention of the moraine in the draft Official Plan. The Plan contains multiple policies that protect recharge areas, groundwater, hydrologic functions, natural heritage, and environmentally sensitive landscapes (where authority allows). However, the Plan does not appear to explicitly identify the Waterloo Moraine, map its inner boundary, or establish a special policy regime for development/protections within that boundary. That matters because a moraine is not just another natural feature. It is a landform and 3273 groundwater system. If the Waterloo Moraine is only protected indirectly through WHPAs, SGRAs, HVAs, Regional Recharge Areas, or EIS requirements, gaps may remain for lands that are hydrologically important but not captured by one specific designation. CSGW recommends implementing protections to the Waterloo Moraine as seen within the “Blueprint for a Bluebelt” policy brief.	The research done on the Waterloo Moraine has informed the policy basis within both the Waterloo Official Plan and the Township. It is not a Provincially recognised feature.
135	21-Jun-26	#: 128 A map of the Environmentally Sensitive Lands is required	The available environmental information is mapped on Schedule C1 as updated by GRCA data.
136	21-Jun-26	#: 129 We are confused as to when an Environmental Impact Statement is required and when an Environmental Impact Study is required. What is the difference between the Statement and the Study? There is no definition of either in the Glossary.	This has been updated to simply require a Study. The two terms were used interchangeably for the same study required on environmental impacts by a Qualified Professional.
137	21-Jun-26	#: 130 Does n) apply to an application to expand an existing pit?	Yes.
138	21-Jun-26	#: 131 A map of the Environmentally Significant Recharge Areas is required.	This has been mapped and updated on Schedule C2.
139	21-Jun-26	#: 132 Expansions of the Urban Area, Township Urban Area, and Rural Settlement Areas or Rural Employment Areas should not be permitted on lands designated as Environmentally Significant Recharge Areas or Environmentally Sensitive Lands.	Noted.
140	21-Jun-26	#: 133 The items included in the Core Environmental Features need to be defined in the Glossary. Details from Official Plans from the Region and other Townships need to be included, such as:	If not defined in the glossary, other provincial legislated definitions will apply (such as those under the Endangered Species Act, or Provincially Significant Wetlands). Wilmot has chosen to maintain the Regional Official Plan's Natural Heritage System Structure, rather than implementing the Provincial Structure. Glossary updated.
141	21-Jun-26	#: 134 The Fisheries and Oceans Canada: Fisheries Act, the Federal Species at Risk Act and the Ontario Endangered Species act should all be used when identifying Endangered Species and Threatened Species. The Fisheries Act already applies to the New Hamburg Baden Wastewater Treatment Plant.	Noted. These Acts supersede the Official Plan.
142	21-Jun-26	#: 135 Does “this plan” refer to the GRCA plan or this Official Plan?	This Official Plan - updated for clarity.
143	21-Jun-26	t) the wording is subject to interpretation by developers. We suggest stronger wording: “Any development application or site alteration for the above uses will require the submission of an Environmental Impact Study, to the satisfaction of the Township, to determine the mitigation measures to be implemented, as appropriate, through the development review process.”	Policy was revised in consultation with ministry staff to address this concern.

		#: 137 Development applications, site alteration or infrastructure projects will only be permitted on lands contiguous to a Core Environmental Feature where an Environmental Impact Study, or similar study, submitted in accordance with the policies in Section 4.A.12 has determined to the satisfaction of the Township, and/or the Province, as appropriate, that approval of the proposed development or site alteration would not result in adverse environmental impacts on the features and ecological functions of the Core Environmental Feature. An Environmental Impact Study submitted in accordance with Policies 4.A.6.4 or 4.A.6.5 will identify appropriate buffers to Core Environmental Features, to the satisfaction of the Township, in consultation with the Conservation Authority where applicable. Such buffers will not only serve to protect Core Environmental Features from adverse environmental impacts but will also provide opportunities for net habitat enhancement to enhance or, wherever feasible, restore the ecological functions of the Core Environmental Feature. The location, width, composition and use of buffers will be in accordance with the approved Environmental Impact Study, with buffers being a minimum of 10 metres as measured from the outside boundary of the Core Environmental Feature and established and maintained as appropriate self-sustaining native vegetation. Where construction of a road on a new right-of-way, widening or upgrading of an existing roadway, construction or upgrading of a trunk sewer, trunk water main gas pipeline or electrical transmission line, wastewater treatment facility, waste management facility or groundwater taking project is proposed within or contiguous to a Core Environmental Feature, the submission of an Environmental Impact Study, or other appropriate study, in accordance with the policies in Section 4.A.12 will be required. Where review of a study completed in accordance with Policy 4.A.6.7 demonstrates to the satisfaction of the Township that the construction of the infrastructure project will: (a) result in localized and/or reversible impacts to the features and ecological functions of the Core Environmental Feature, and that other alternatives are less feasible from a technical, environmental and/or financial perspective, the Township will, without amendment to this Plan: i) require that appropriate mitigation measures be implemented; and ii) approve the undertaking; or iii) support the undertaking in comments, submissions or recommendations; or (b) result in widespread adverse environmental impacts to the features and ecological functions of the Core Environmental Feature or result in long-term damage to its significant features and functions, and that other technically and financially feasible alternatives exist that would have fewer adverse environmental impacts, the Township will: i) not approve the undertaking; or recommendations; or (c) result in widespread adverse environmental impacts to the features and ecological functions of the Core Environmental Feature, or result in long-term damage to its significant features and functions, but that there is a clearly demonstrated need for the undertaking, and that all other alternatives to the recommended undertaking are substantially less feasible from a technical, environmental, and/or financial perspective, the Township will, without amendment to this Plan: i) require that appropriate mitigation measures be implemented to reduce the impact of the undertaking to greatest extent feasible; and ii) approve the undertaking; or iii) support the undertaking in comments, submissions or recommendations. Core Environmental	
144	21-Jun-26	Features that are privately owned are not for use by the public, except at the discretion of the owner.	Noted.
145	21-Jun-26	#: 138 Schedule C1 does not accurately represent the Recharge Area or flood plains. GRCA mapping should be used.	Mapping updated to address this.
146	21-Jun-26	#: 139 See our comments about the Fisheries Act above.	Noted.
147	21-Jun-26	#: 140 Is there a map of these areas?	Yes. There are a few areas in Wilmot. Including: Phillipsburg Forest, St Agatha Beech Maple Forest, Spongy Lake Bog, and Phillipsburg Swamp. https://geohub.lio.gov.on.ca/datasets/areas-of-natural-and-scientific-interest-ansi/about
148	21-Jun-26	#: 141 The GRCA Environmental Impact Studies (O. Reg. 150/06) seemed to have been revoked on April 1, 2024. Is there a new GRCA EIS?	The Township now requires the submission of the Environmental Impact Studies.

149	21-Jun-26	#: 142 From Woolwich “Environmental Linkages are areas intended to provide opportunities for plant and animal movement within and between environmental features, support hydrological and nutrient cycling, and contribute to the overall ecological integrity of the Natural Heritage System. Existing Environmental Linkages are not identified on Map 4.1. The Township, in consultation with the Conservation Authority and other stakeholders, will identify Environmental Linkages through appropriate studies as determined by the Township or Conservation Authority. The Township will require the incorporation of any Environmental Linkages, identified in accordance with the policies of this Plan, into the design of new development to maintain, enhance or, wherever feasible, restore the Environmental Linkages within and between environmental features. The Township will enhance Environmental Linkages, where appropriate, by restoring natural habitat on lands owned by the Township. The Township will encourage the naturalization of inactive sections of parks and open space areas under the jurisdiction of other agencies and in private ownership, wherever appropriate, to enhance Environmental Linkages.”	Noted. Linkage policies were carried forward from the Regional Official Plan.
150	21-Jun-26	#: 143 Note: Consider means compliance is not necessary We suggest rewriting as: During the development review process, the Township will evaluate impacts on woodlands by assessing the following:	Addressed.
151	21-Jun-26	#: 144 Schedule C2 should be replaced with GRCA mapping	Addressed through updated mapping.
152	21-Jun-26	#: 145 The Township will maintain and wherever feasible, enhance the quality and quantity of water infiltration and recharge to groundwater aquifers. The Township will work with the Region to make land use planning decisions to protect the quality and quantity of drinking- water resources, and to limit development and site alteration that could adversely affect drinking-water supplies drawn from the Grand River and from groundwater resources. Overall Goal – Protect, maintain and, wherever feasible, enhance surface water and groundwater resources to ensure that a municipal drinking-water supply system continues to provide a sufficient quantity and quality of drinking-water. Objectives: a) Protect existing and future sources of drinking water from incompatible land uses. b) Maintain and, wherever feasible, enhance the quantity and quality of water infiltration and recharge to groundwater aquifers. c) Minimize the potential for contamination, including potential contamination from de- icing salts, on sources of municipal drinking-water. d) Promote informed stewardship of Source Water Protection Areas in collaboration with the Province and Conservation Authority. e) Require water conservation measure in new development. Where the policies of this Plan conflict with an approved Source Water Protection Plan, the latter shall prevail and be implemented by the Township.	The Township has worked with the Region to update and streamline the Source Water Protection Policies, creating a new and more robust policy framework that is more user friendly.
153	21-Jun-26	#: 146 Why is IPZ 3 not included in the risk assessment?	The risk assessment table has also been updated in collaboration with the Region.
154	21-Jun-26	#: 147 Note: Considered means compliance is not necessary. We suggest 5 be rewritten as: “Assess cumulative water demand to protect groundwater from overuse.”	Updates were made to this policy section in alignment with the Region's new Source Water Protection policies.
155	21-Jun-26	#: 148 Note: Consider means compliance is not necessary. We suggest rewriting: The Township will consider the importance of these areas for maintaining the long-term water supply of an aquifer when undertaking secondary or community planning exercises. As "When preparing secondary or community plans, the Township must protect these areas to secure the aquifer's long-term water supply.”	Updates were made to this policy section in alignment with the Region's new Source Water Protection policies.
156	21-Jun-26	#: 149 A map of Highly Vulnerable Areas (HVA) is needed and should be added as a Schedule.	Updates were made to this policy section in alignment with the Region's new Source Water Protection policies.
157	21-Jun-26	#: 150 Where do we find the template for a salt management plan? There should be something similar to the Salt Management Plan for Elgin County. https://www.elgincounty.ca/wp-content/uploads/2024/04/SMP-2020-3904 Update_September2020.pdf	Noted. It would not be included as part of the Official Plan.
158	21-Jun-26	#: 151 3912 3913 Note: Consider means compliance is not necessary 3914 3915 We suggest h) be rewritten: 3916 3917 "For new subdivisions, the Township: 3918 • Require drainage and lot grading designs that account for cold weather 3919 Stormwater flows and winter maintenance. 3920 • Requires strategic road network designs that reduce the need for road salt."	Updates were made to this policy section in alignment with the Region's new Source Water Protection policies.

159	21-Jun-26	#: 152 Protect the Waterloo Moraine Suggested new section for the Moraine: Waterloo Moraine Protection Area The Township recognizes the Waterloo Moraine as a significant landform and groundwater recharge/discharge system that supports municipal drinking-water supplies, private wells, baseflow to streams and wetlands, agricultural productivity, and ecological resilience. Development and site alteration within the inner boundary of the Waterloo Moraine shall be extremely limited and shall only be permitted where it has been demonstrated, through independent hydrogeological, ecological, agricultural, and cumulative impact studies, that there will be no negative impact on groundwater recharge, groundwater quality, groundwater quantity, surface-water features, natural heritage, prime agricultural lands, or the agricultural system. Map the inner boundary of the Waterloo Moraine The Plan should include a dedicated map schedule showing: Inner boundary of the Waterloo Moraine Outer boundary, if applicable (i.e. external buffer zone) Significant Groundwater Recharge Areas Highly Vulnerable Aquifers WHPA-Q areas Regional Recharge Areas Prime Agricultural Areas Core Environmental Features Existing aggregate resource areas Existing and proposed settlement boundaries This would make conflicts visible and allow Council, staff, residents, and applicants to understand where the strictest policies apply. Add a prohibition on settlement expansion into the inner moraine boundary Suggested wording: Settlement area expansions shall not be permitted within the inner boundary of the Waterloo Moraine. Exceptions shall be limited to essential public infrastructure where no reasonable alternative exists, where the project is demonstrated to be in the public interest, and where no negative impact to groundwater recharge, water quality, water quantity, natural heritage, or prime agricultural lands has been demonstrated. The Plan already refers to agricultural impact assessments for settlement expansion and non-agricultural impacts. This should be expanded. - Require an Agricultural Impact Assessment for: - Rural institutional uses - Recreation/tourism uses - Aggregate applications - Renewable energy facilities on prime farmland - Major infrastructure corridors - Any non-agricultural use in Prime Agricultural Areas - Any development within or adjacent to the inner boundary of the Waterloo Moraine Strengthen aggregate restrictions Suggested changes: - Prohibit all new aggregate extraction within the inner boundary of the Waterloo Moraine.- Prohibit all extraction in recharge-sensitive areas. - Require independent peer review paid by the applicant but scoped and retained by the Township. - Require cumulative impact assessment across the full watershed/recharge system, not only nearby pits. - Require financial securities sufficient for long-term monitoring and remediation. - Require public reporting of groundwater monitoring data.	Unaddressed. Response on the inclusion of the Waterloo Moraine as a mapped feature is included throughout.
160	21-Jun-26	#: 153 We have ignored most of this section as gravel pits and quarries are controlled by the Ministry of Agriculture. The Ministry has declared gravel a natural resource and there seems to be very little municipalities can do to limit pit operations.	Noted.
161	21-Jun-26	#: 154The Plan allows extraction subject to technical studies. From a groundwater-protection perspective, this should be tightened. Suggested position: Any/all aggregate extraction should be prohibited within the inner boundary of the Waterloo Moraine, Significant Groundwater Recharge Areas, Highly Vulnerable Aquifers, WHPA-Q areas, and lands contributing to municipal drinking-water systems.	The policies for Mineral Aggregate Operations are as tight as they can be under provincial legislation.
162	21-Jun-26	#: 155 Define interim. Define a time for when a gravel pit is declared abandoned. Require a bond to cover the cost of rehabilitating abandoned pits. Note: the Ontario Aggregate Resources Corporation collects ½ cent for every tonne of gravel extracted as a fee to cover the rehabilitation. There are over 8,000 abandoned gravel pits in Ontario so clearly this amount is not enough to convince pit owners to rehabilitate their pits. A bond would allow the Township to take over the rehabilitation of abandoned pits. Agricultural rehabilitation must be prioritized.	These are defined by the province. Agricultural rehabilitation is prioritized.
163	21-Jun-26	#: 156 Note: s) missing in original	Thank you, addressed.
164	21-Jun-26	#: 157 We need to protect Prime Agricultural Land. Gravel pits must not be allowed unless a timeline to restore the land and a bond is in place to cover the cost of restoration. Less than 20% of gravel pits are restored to agricultural land and the majority of these are only suitable for pasture. https://toarc.com/news/2025-2026-aggregate-fees/ We must do better.	Noted. Wilmot is bound by provincial legislation.
165	21-Jun-26	#: 158 We must require that gravel wash use recycled water. There must be an annual limit on the amount of water used. Currently, gravel pits are allowed to use 50,000 litres of water without a Permit To Take Water from the Province. Considering our water crisis, this needs to be better controlled by the Township.	The Township cannot set this requirement, as it is bound by Provincial Legislation.

166	21-Jun-26	District energy should not be included unless it uses renewable energy.	District energy could be used to conserve energy from non-renewable energy sources.
167	21-Jun-26	#: 159 What is the target for conservation?	The Official Plan does not contain a target for conservation. This would be better established through a Community Energy and Emissions Plan.
168	21-Jun-26	An Environmental Impact Study is a document describing the effects of proposed activities on the "Environment", which in this case is defined as the natural and physical environment and the relationship of people with that environment. This means that the "environment" considered in an Environmental Impact Study includes land, water, air, structures, living organisms, environmental values at the site, and the social, cultural, and economic aspects. An "impact" is a change in consequence that results from an activity. Impacts can be positive or negative or both. An Environmental Impact Study describes impacts, as well as ways to "mitigate" impacts. To "mitigate" means to lessen or remove negative impacts. Therefore, an Environmental Impact Study is a document that describes the impacts on the environment as a result of a proposed action. It also describes the impacts of alternatives as well as plans to mitigate the impacts. General Policies An Environmental Impact Study will be required in accordance with the policies of this Plan to identify and evaluate the potential effects of a proposed development or site alteration on elements of the Natural Heritage System, and recommend means of preventing, minimizing or mitigating these impacts, as well as enhancing or restoring the quality and connectivity of elements of the Natural Heritage System. This plan should be in accordance with Wilmot's 50x30 and 80 by 50 commitments. An Environmental Impact Study may also be used to identify and evaluate elements of the Natural Heritage System and interpret the boundaries of these elements based on ecological considerations. The Township, the Province, the Conservation Authority, and other affected public agencies will co-ordinate the requirements for the preparation of an Environmental Impact Study. Any Environmental Impact Study required under this Chapter will be prepared in accordance with the Terms of Reference prepared to the satisfaction of the Township.	Noted.
169	21-Jun-26	#: 160 Missing: Environmental Stewardship Section - Biodiversity and importance to Wilmot - Roadside Trees - Managing Woodland Resources - Land Stewardship – encouraging native species, environmental restoration	Noted. This is addressed through the Township's Tree Canopy Policy Framework. Additional policies were put forward that encourage native species.
170	21-Jun-26	#: 161 Need a definition of Natural Hazards in the Glossary. Permitted uses within the Natural Hazards should be designated: may include agriculture, conservation, passive recreational uses, flood infrastructure and forestry and wildlife management. Woolwich: "Natural Hazards identify areas that are to be generally restricted from development. These lands contain physical characteristics that could be unsafe to development due to naturally occurring hazards, such as flooding, erosion or slope failures. To prevent the loss of life and minimize property damage and social disruption, this Plan seeks to direct development away from these natural occurring hazards, except where it is determined to be appropriate and safe."	Not addressed. The policies and the maps identify Natural Hazards, meaning a concise definition would be difficult to include. It includes floodways, erosion, shoreline, karst and other hazardous features that occur naturally.
171	21-Jun-26	#: 162 Why is development "generally" directed and not "will be" directed"?	Addressed. Development shall be directed.
172	21-Jun-26	#: 163 Note: A GRCA designated flood plain runs through the proposed mega-site. Are these regulations enough to stop the mega-site?	Noted.
173	21-Jun-26	#: 164 It is not clear why there is a reference to b)	Edited policy number to point to c) instead.
174	21-Jun-26	#: 165 Why is development "generally" directed and not "will be" directed"?	Addressed. Changed to "shall".
175	21-Jun-26	#: 166 The "Special Policy Area" are defined on A3-1 as "Area-Specific Policies".	Addressed. Thank you.
176	21-Jun-26	#: 167 This section needs an introduction: From Woolwich: Designing places for people and enhancing those that currently exist are key in celebrating the community while planning to meet the needs of a growing population. The Township's buildings, landscapes, pathways, parks and streets that connect people to places and to each other are the key aspects of urban design, along with the preservation of the Township's cultural heritage resources and maintenance of the unique small-town character.	Addressed.

177	21-Jun-26	#: 168 Development through intensification will reduce the pressure on farmland, produce more walkable communities and bring residents closer to amenities. However, whether we intensify or sprawl, we are very concerned about the growth target of 12,000 more people. What is a realistic growth target? What infrastructure is needed for 12,000 and how is it to be paid for?	Capacity of the plant is not fixed, especially with continued inflow and infiltration improvements over the time horizon of this Plan. The Official Plan has a policy identifying that "The Township, in collaboration with the Region, shall continue to develop programs which optimize use and efficiency of the Baden-New Hamburg Water and Wastewater Systems including, but not limited to continued annual investment in monitoring systems and programs to detect and repair areas of inflow and infiltration, and review current and improved technologies within the Baden-New Hamburg wastewater treatment plant." and that should capacity not exist "Development approvals may be subject to a Holding (H) provision in the zoning by-law limiting development until capacity within municipal water services and municipal sewage services is available." This means that no building permits will be issued without sufficient treatment capacity.
178	21-Jun-26	#: 169 Why not use a walkability score and transit score to define block length and location of amenities?	The policy limiting block lengths is based around contributing to walkability. WalkScore and TransitScore are external scoring tools ,so are not referenced in the Official Plan.
179	21-Jun-26	#: 170 Layouts should discourage cul-de-sacs as they reduce walkability. However, if there is no alternative, there should be corridors to adjacent streets.	Noted. This is addressed in the policy as written.
180	21-Jun-26	#: 171 Note: Consideration means compliance is not necessary We suggest replacing “consideration” with “evaluation”	Addressed.
181	21-Jun-26	#: 172 Note: Consideration means compliance is not necessary We suggest replacing “consideration” with “evaluation”	Addressed.
182	21-Jun-26	#: 173 Note: Consideration means compliance is not necessary We suggest replacing “consideration” with “evaluation”	Addressed.
183	21-Jun-26	#: 174 Why are there no energy efficiency requirements?	The province has limited the ability of planning documents to require anything related to building sustainability beyond what is contemplated by the Ontario Building Code.
184	21-Jun-26	#: 175 Note: Considered means compliance is not necessary We suggest replacing “considered” with “required”	Not addressed. Flexibility on compatible development is an important component of enabling intensification development typologies.
185	21-Jun-26	#: 176 Note: Consideration means compliance is not necessary We suggest replacing “should be given consideration” with will be evaluated”	Not addressed. Flexibility on compatible development is an important component of enabling intensification development typologies.
186	21-Jun-26	#: 177 Note: Consider means compliance is not necessary	Addressed.
187	21-Jun-26	#: 178 Note: Considerations means compliance is not necessary	Not addressed. This is guidance for new development, not a requirement.
188	21-Jun-26	#: 179 Note: Consideration means compliance is not necessary	Not addressed. This is guidance for new development, not a requirement.
189	21-Jun-26	#: 180 Where are noise limits, calibration standards, and detection methods defined?	Through provincial legislation and guidelines, not the Official Plan.

190	21-Jun-26	#: 181 Off lease dog areas must be fenced.	Addressed.
191	21-Jun-26	#: 182 p) Must not be allowed. Rural designation includes Prime Agricultural Areas	Addressed, this policy only applies to Rural designated lands, not Prime Agricultural Areas.
192	21-Jun-26	#: 183 All Site Plans must include: - An analysis of the greenhouse gas emissions from the planned development. - An analysis of the impact on the groundwater - An estimate of the amount of water to be consumed and the amount of sewage to be disposed of. - An analysis of the financial impact on the Township including snow removal, roads, lighting, water and sewage infrastructure. - An analysis of he water conservation plan.	The Township does not have an ability to require these things under Site Plan Control.
193	21-Jun-26	#: 184 Add Water Conservation Plan	The Province is limiting municipalities abilities to add new reports or studies as part of a complete application. New study requirements will not be supported.
194	21-Jun-26	: 185 Why is the Countryside Line no longer permanent?	Provincial policy no longer provides for a permanent countryside line. That said, the boundary still reflects Wilmot Township's long term vision for growth.
195	21-Jun-26	#: 186 This appendix includes 19 pages of all the streets in Wilmot. The list includes the name, type of road and the maximum road allowance. The problem is that any new street, not named in the appendix, is not covered by the maximum allowance. The 219 pages should be deleted and replaced by Maximum Road Allowance: - Local Residential - 20.117 metres - Local Collectors - 26.213 metres- Rural Collectors - 30.480 metres Any new roads built in the Township will now be governed by the maximum road allowance.	New Streets can be added to the list without an amendment to the Official Plan as it is an appendix. New roads will be built to the standard that is appropriate - the Designated Road Widths Table is for securing road widenings on existing roads.
196	21-Jun-26	#: 187 See the Official Plan Draft 2 document for the housing densities used for planning	Noted.
197	21-Jun-26	#: 188 See the Official Plan Draft 2 document	This Appendix has been updated in collaboration with the Region.
198	21-Jun-26	#: 189 Land Use maps and background Studies are at https://www.engagewr.ca/new-wilmot-official-plan	Noted.