

Planning Justification Report

430 Snyder's Road East
Township of Wilmot, Region of Waterloo



1000685410 Ontario Inc.
Zoning By-law Amendment

July 2024

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1. Introduction

1.1 Background

GSP Group has been retained by 1000685410 Ontario Inc. (the “Owner”) to prepare a Planning Justification Report in support of an application for a Zoning By-law Amendment for the property municipally known by the Township of Wilmot as 430 Snyder’s Road East, Baden (the “Subject Property”).

The Owner is proposing to create a four-storey office on the Subject Property to replace the existing office. The proposed development also includes a total of 63 parking spaces for employees, a loading bay on the north end of the proposed building, and an asphalt open storage area on the west side of the Subject Property.

The Subject Property is located within a Built-Up Area and within a Township Urban Boundary of the Region of Waterloo Official Plan. The Subject Property is located within the Urban Area and is designated “*Urban Residential*” in of the Township of Wilmot Official Plan. The existing and proposed office and open storage uses are not contemplated by the Urban Residential designation but represent a legal non-conforming use. Section 10.20 of the Township of Wilmot Official Plan states that “*Notwithstanding the provisions of this Plan, it is the policy of the Township that any lands used for any legally existing purpose in any designation for which no provision is made by this Plan for such activity to be undertaken, may continue to be used for such purpose*”.

The Subject Property is currently zoned “Z8 - *Commercial*” in the Township of Wilmot Zoning By-law 2020-026.

A Zoning By-law Amendment is required to permit a maximum building height of four storeys and to address parking provisions to facilitate the proposed office. This Planning report is provided in support of the submitted Zoning By-law Amendment application.

A pre-submission consultation was held by the Township of Wilmot in November of 2023, where the following list of documents were listed as required plans and studies for a complete Zoning By-law Amendment application.

GSP Group and the landowner have been working with the Region and Township of Wilmot Staff to reach a servicing arrangement agreeable to all parties. Active review and revisions were made of the design of the proposed development in response to these comments. This agreement is outlined in Appendix A.

Please find the following documents in support of the submitted Zoning By-law Amendment application:

- Cover Letter,
- Completed/Signed Zoning By-law Amendment Application Form
- Owner Authorization Form
- Planning Justification Report
- Section 59 Notice of Source Protection Compliance
- Municipal Application Fee in the amount of \$5,700
- Regional Application Fee in the amount of \$3,000

1.2 Purpose and Scope

This report has been prepared in support of the submitted Zoning By-law Amendment Application. The objectives of this report are as follows:

- To provide a description of the Site's existing conditions and its context within Township of Wilmot and the immediate surroundings (Section 2),
- To outline the proposed planning application for the Proposed Development (Section 3),
- To describe the proposed Zoning By-law Amendment, including the requested relief from the By-law (Section 4),
- To provide an overview and analysis of the relevant Provincial and Municipal planning policy and regulatory context relevant to the proposed application, as well as to demonstrate consistency with or conformity to such policies and provisions (Section 5),
- To provide an overview of the types of studies conducted in support of the proposed application, including a description of their scope and summary of their conclusions (Section 6),
- To provide an overview of the conclusions of supporting plans and studies for the proposed development (Section 7),
- To demonstrate and share cooperation with Municipal Staff regarding an appropriate servicing arrangement (Appendix A), and
- To provide a draft Zoning By-law Amendment for adoption to serve as an instrument of approval (Appendix B).

2. Site Information

2.1 Site Location and Context

The Subject Property is located on the east end of the Baden urban settlement area. The Subject Property is located on the north side of Snyder's Road East. The Subject Property is located in a block generally bounded by a CN Rail line to the north, Sandhills Road to the east, Snyder's Road East to the south, and Brubacher Street to the west (Figure 1).

A residential dwelling of rural character with a large front yard setback and tree coverage along the front lot line is located abutting east of the Subject Property. A Wooded area located, technically speaking, outside of the Baden settlement area about the northern lot line of the Subject Property. A detached dwelling with a large interior side yard between itself and the Subject Property exists to the west. The interior side yard of the Subject Property is heavily treed. A residential suburb exists to the south of the Subject Property. One detached dwelling fronts on to Snyder's Road East, while the remaining lots front on to various streets internal to the subdivision.

The Subject Property is corner lot with approximately 143 metres of frontage along Snyder's Road East and a lot area of approximately 0.94 hectares (2.31 acres).

The Subject Property is regulated by the Grand River Conservation Authority. The Subject Property is mostly located within a flood plain and has a regulated watercourse running generally along the north lot line.

2.2 Existing Conditions

The Subject Property currently contains a two-storey office building and outside storage. A limited amount of motor vehicle parking is provided on a parking lot directly along Snyder's Road East, towards the eastern-most corner of the Subject Property.

Site access is provided from Snyder's Road East via a wide curb cut to the existing parking lot. Further access for loading and to access the on-site outdoor storage area is provided along the entirety of the eastern lot line fronting on to Sandhills Road

Trees of various ages and types exist along the north and west lot lines of the Subject Property. Some trees exist on the Subject Property itself, and others exist directly along their respective lot line. There is a public sidewalk along the southern lot line along Snyder's Road East. There are no sidewalks along the side lot line along on to Sandhills Road.



Figure 1
Site Context
Source: Google Earth (2024)

Snyder's Road East is currently approximately 26 metres in width. Snyder's Road East (Regional Road #01) to the east of Schneller Road has a designated width in the Regional Official Plan (ROP) of 30.480 metres. An approximate 4.45 metre road widening will be required along a portion of the Snyder's Road East frontage.

Sandhills Road is currently approximately 20 metres in width. The Township of Wilmot Official Plan dedicates a designated road allowance of 20.117 metres for Sandhills Road. No road widening is required

A bus stop near the intersection of Snyder's Road East and Forler Street services route 77 and is located an approximately six-minute walk (400m) west of the Subject Property. A bus stop near the intersection of Snyder's Road East and Gingerich Road services route 77 and is located an approximately six-minute walk (400m) of from the Subject Property.

3. Proposed Development

A four-storey office building is proposed on the Subject Property to replace the existing two-storey office building. The proposed building will be oriented in a manner that presents itself to the corner of Snyder's Road East and Sandhills Road, compared to the existing building which is oriented only towards Snyder's Road East (Figure 2).

The proposed development generally reads as three sections divided east-to-west. The eastern section contains the proposed office building and a small portion of the proposed parking spaces. The center section contains the parking lot containing a vast majority of the proposed parking spaces. The western section contains open storage which services the office and business which operates from the Subject Property.

A total of 63 parking spaces are proposed, distributed among three portions of the Subject Property.

A single row of nine parking spaces are proposed in an angled configuration along Sandhills Road. These parking spaces are accessible by both Snyder's Road East and Sandhills Road but are more easily accessed by the latter.

Forty-four parking spaces are proposed in the central parking lot, which contains four rows of parking spaces with two isles providing a circular flow of traffic. Three accessible parking spaces are proposed as close as possible to the proposed office, including a ramping of asphalt to ensure the parking spaces are flush with the top of the sidewalk/curb.

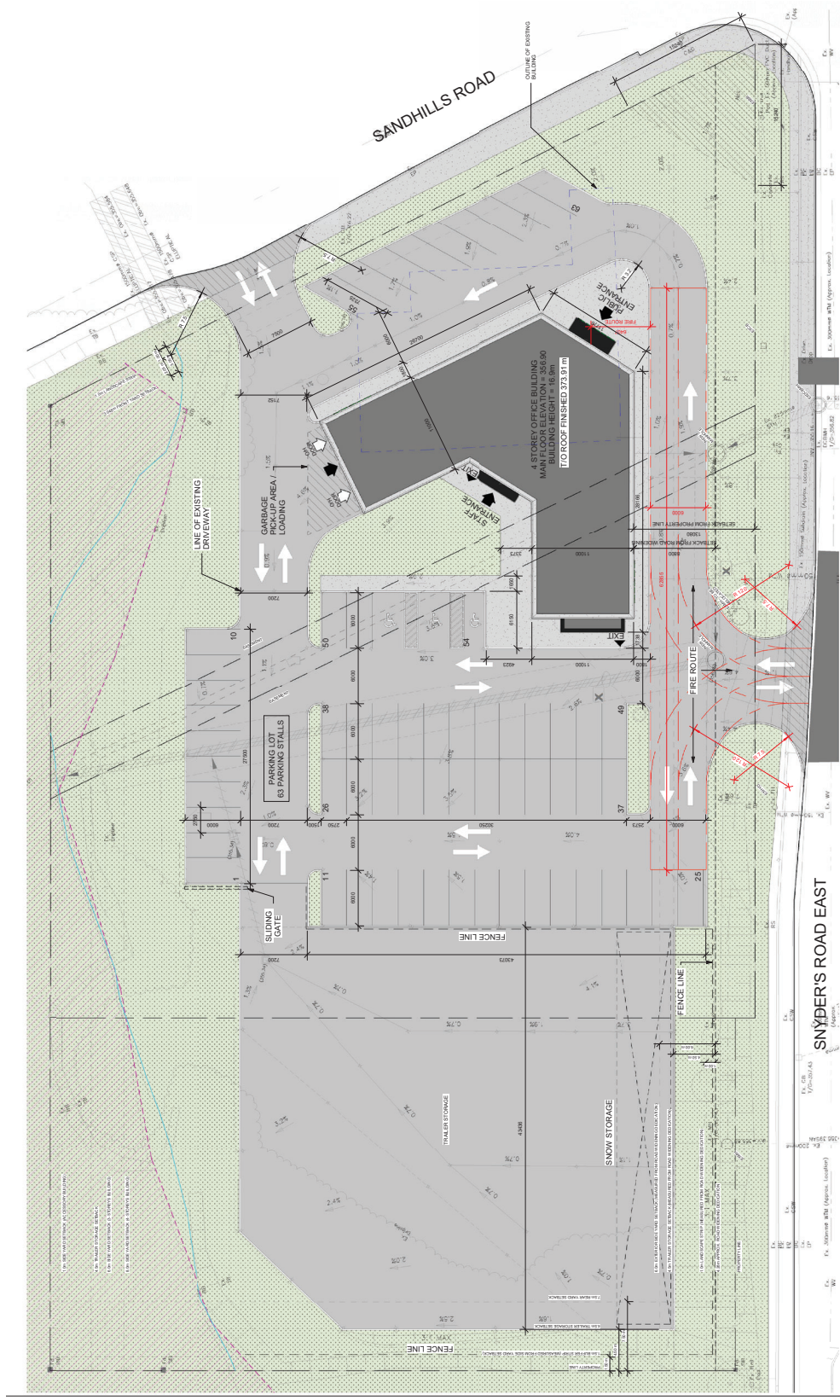


Figure 2
 Concept Plan
 Source: WalterFedy (2024)

The parking lot is accessible from both Snyder's Road East and Sandhills Road but is more easily accessible by the former.

A row of ten parking spaces are proposed along the northern lot line, located just north of the main parking lot. These parking spaces are accessible both from the general parking lot and from Sandhills Road. These spaces are more easily accessible from the latter.

The outdoor storage area along the west portion of the Subject Property contains a single access along the north-eastern most corner of this portion of the site. This area is accessible from both Snyder's Road East and Sandhills Road but is more easily accessible from the latter.

A landscape buffer is proposed along both Snyder's Road East and Sandhills Road. A 0.6-metre tall retaining wall is proposed along the north side of the Subject Property, and extends across the north-west corner of the Subject Property.

4. Proposed Application

4.1 Zoning By-law Amendment

A Zoning By-law Amendment has been submitted to provide relief from provisions of the Township of Wilmot Zoning By-law 2020-026. A site-specific exception is proposed to provide for the required relief.

The required relief is as follows:

- To permit a Maximum Building Height of four (4) storeys; whereas the Zoning By-law requires a Maximum Building Height of two (2) storeys (Section 14.3.9).
- To permit angled parking spaces; whereas the Zoning By-law only permits rectangular parking spaces.

5. Planning Rationale

5.1 Zoning By-law Amendment

5.1.1 Planning Act (R.S.O. 1990)

Subsection 34 (10) of the Planning Act R.S.O. 1990 ("The Planning Act") states:

34. (10) Despite any other provision of this section, any by-law passed under this section or a predecessor of this section may be amended so as to permit the extension or enlargement of any land, building or structure used for any purpose prohibited by the by-law if such land, building or structure continues to be used in the same manner and for the same purpose as it was used on the day such by-law was passed. R.S.O. 1990, c. P.13, s. 34 (10).

The existing land, building, and structures will continue to be used in the same manner and for the same purpose as is currently used prior to any future amendment to the Zoning By-law. The Zoning By-law Amendment itself does not permit development and will put the required policy framework in place such that a Site Plan Approval application can be submitted to permit the proposed development.

The Township of Wilmot is a prescribed lower-tier municipality. The Township of Wilmot is the approval authority for the proposed Zoning By-law Amendment.

5.1.2 Provincial Policy Statement (2020)

The Provincial Policy Statement (PPS), issued under the *Planning Act* with the latest version coming into effect on May 1, 2020 provides direction on matters of provincial significance related to land use planning. The *Planning Act* requires that, “*decisions affecting planning matters shall be consistent with*” the PPS. The overriding vision of the PPS states that “*the long-term prosperity and social well-being of Ontarians depends on maintaining strong communities, a clean and healthy environment and a strong economy.*” The below sub-sections address the relevant PPS policies concerning the Site and the Proposed Applications and assess the consistency of the latter with these policies.

The Subject Property is located within a Township Urban Boundary and is considered a Built-Up Area on Map 3c of the Region of Waterloo Official Plan.

Section 1.3.1 of the PPS states that “*Planning authorities shall promote economic development and competitiveness by:*

- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;”*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*

- d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4; and*
- e) ensuring the necessary infrastructure is provided to support current and projected needs”.*

The submitted Zoning By-law Amendment application would facilitate the construction of a four-storey office building and associated industrial parking on site. The proposed development contributes to the mix and range of employment uses. The proposed development continues to be a suitable site for employment uses which contributes to the wide range of economic activities in Baden.

The proposed development is fronts on to Snyder’s Road East, which contains existing public municipal services to service the Subject Property.

Section 1.3.2.1 of the PPS states that “*Planning authorities shall plan for, protect and preserve employment areas for current and future uses and ensure that the necessary infrastructure is provided to support current and projected needs*”.

While *Map 4.1 - Baden Urban Area* does not contain designated employment areas, the Subject Property currently contains a land use that provides employment. The submitted Zoning By-law Amendment application facilitates the proposed development, which in turn provides for an intensification of employment opportunities on a site where some employment already exists. The proposed zoning by-law amendment application is consistent with the PPS.

5.1.3 Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”) came into effect on May 16, 2019 with Amendment 1 (2020) coming into effect on August 28, 2020. The Growth Plan supports the development of complete communities that are compact, transit-supportive and make efficient use of infrastructure and public service facilities.

The submitted Zoning By-law Amendment application facilitates the proposed development, which fronts on to a municipal road with existing public municipal services. This results in a development which makes efficient use of infrastructure and public services.

The Growth Plan provides an overall growth strategy for the Greater Golden Horseshoe region that complements the Provincial Policy Statement and is implemented by municipal planning documents. The provincial government is currently evaluating consolidating the Provincial Policy Statement and Growth Plan for the Great Golden Horseshoe into a new Provincial Policy Statement.

At the core of the Growth Plan are guiding principles for building compact, vibrant and complete communities; planning and managing growth to support a strong, competitive economy; and optimizing the use of existing or planned infrastructure to support growth in a compact and efficient form.

The submitted Zoning By-law Amendment application facilitates the proposed development, which will contribute to building a competitive economy.

The submitted Zoning By-law Amendment application facilitates the proposed development, which fronts on to a municipal road with existing public municipal services. This results in a development which optimally uses existing infrastructure to support growth and results in a compact and efficient form.

Section 2.2.5 (1) of the Growth Plan states that *“Economic development and competitiveness in the GGH will be promoted by:*

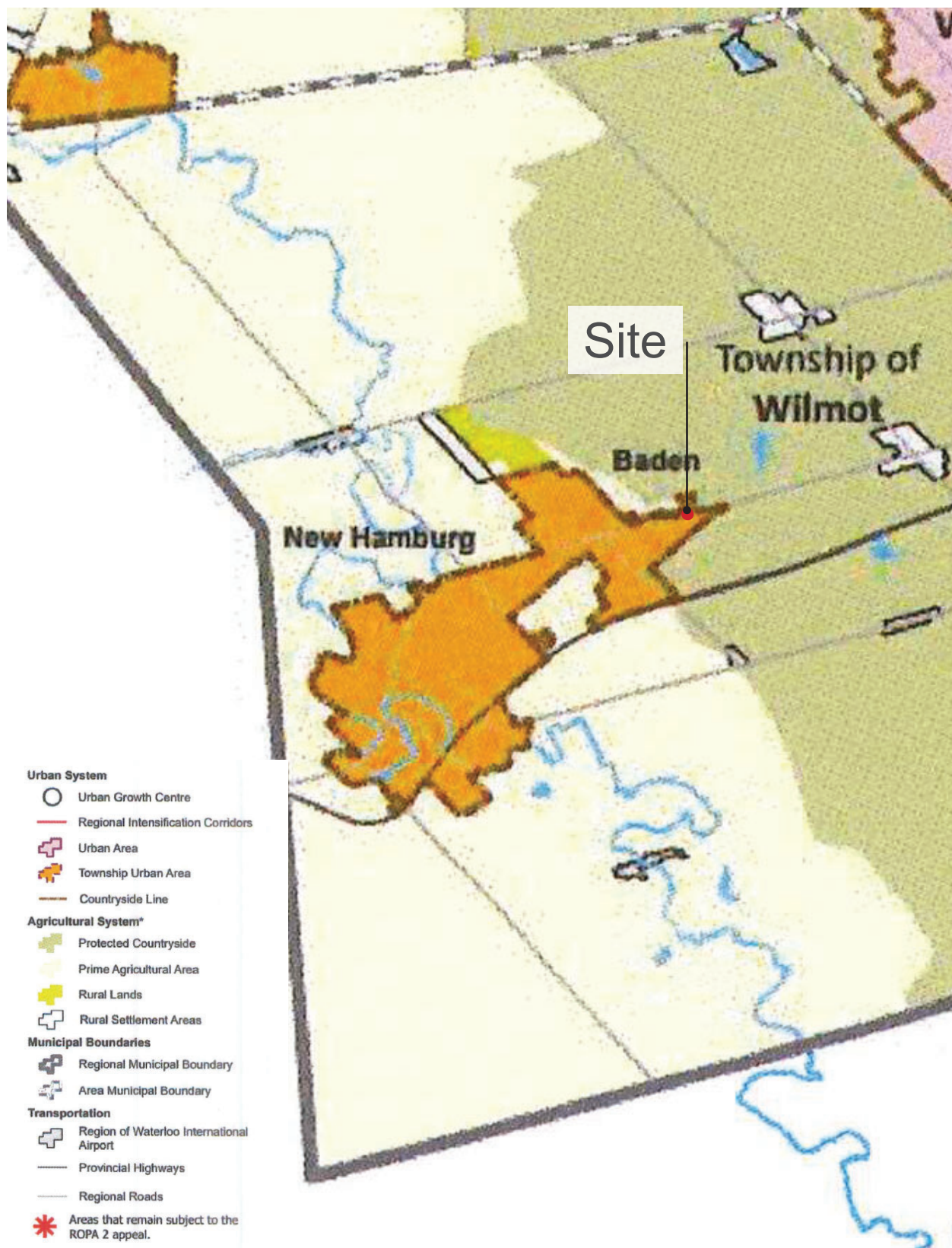
- a) making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;*
- b) ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan;*
- c) planning to better connect areas with high employment densities to transit; and*
- d) integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment.”*

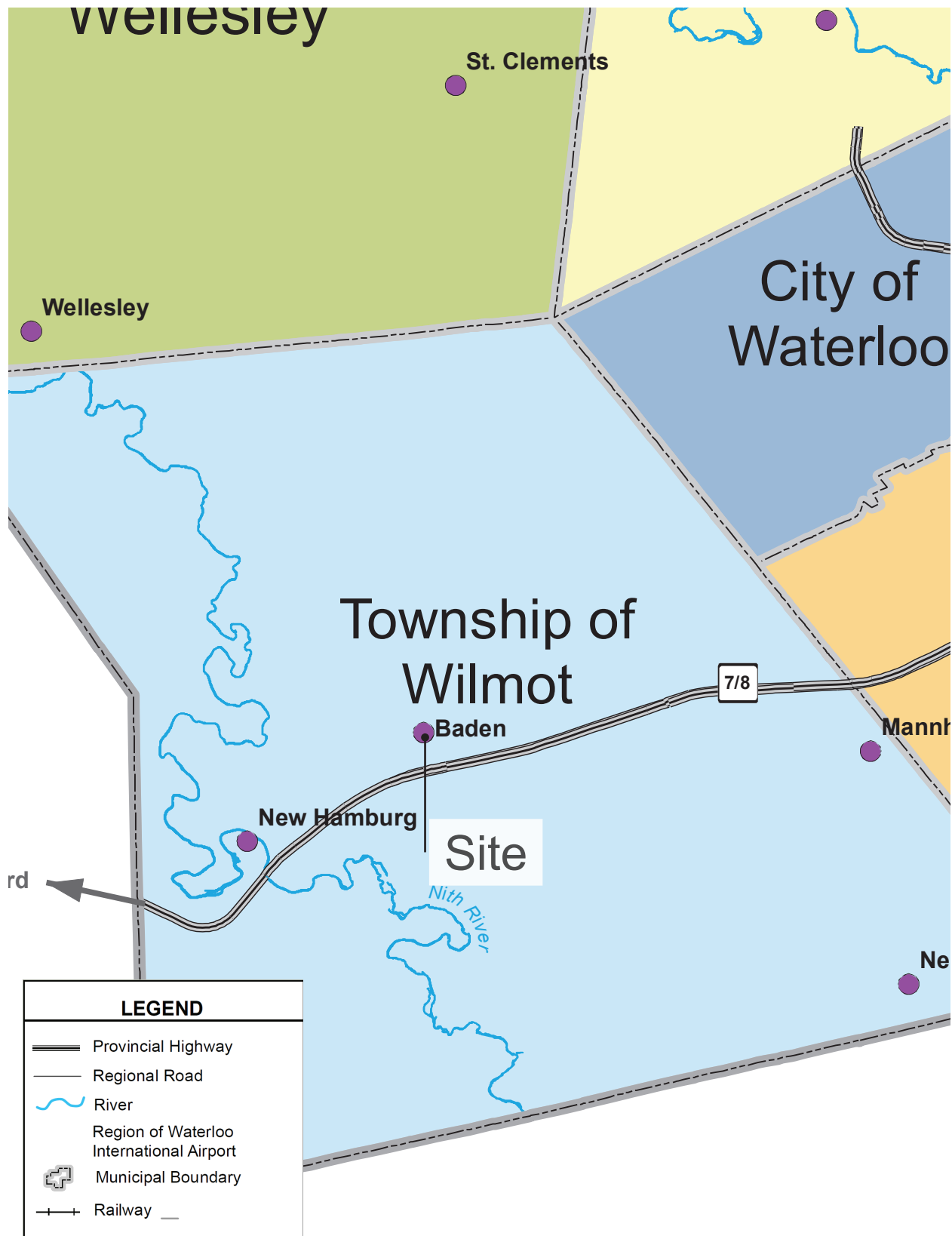
The submitted Zoning By-law Amendment application facilitates the proposed development, which would intensify an underutilized employment use and increase employment density. The proposed development will intensify employment density without the need to consume more land; the proposed development provides an efficient opportunity for employment intensification within the Baden Urban Boundary. The requested zoning by-law amendment application is in conformity with the policies of the Growth Plan.

5.1.4 Region of Waterloo Official Plan

The Subject Property is located within a Built-Up Area and within a Township Urban Boundary on Map 3c of the Region of Waterloo Official Plan (Figure 3, Figure 4).

Section 2 of the Regional Official Plan states that *“Achieving more balanced growth means directing a greater share of new development to the existing Built-Up Area to make better use of land, existing physical infrastructure, community infrastructure and human services”*.





The submitted Zoning By-law Amendment application facilitates the proposed development, which fronts on to a municipal road with existing public municipal services. This results in a development which makes efficient use of infrastructure and public services.

Section 2.6 of the of the Regional Official Plan states that one of the Objectives regarding shaping Waterloo Region's Urban Communities is to "*Strengthen the economic vitality of the region's townships by directing most of their growth into the Township Urban Areas*".

The submitted Zoning By-law Amendment application facilitates the proposed development, which will contribute to the strengthening of the economic vitality of the Township of Wilmot by providing an increase of employment density within a Township Urban Area.

Section 2.B of the Official Plan directs the Planned Community Structure of the Region, stating that "*Virtually all of the region's future growth will occur within the Urban Area and Township Urban Area designations, with a substantial portion of this growth directed to the existing Built-Up Area of the region through reurbanization*".

The submitted Zoning By-law Amendment application facilitates the proposed development, which is located in the Built-Up Area of Baden.

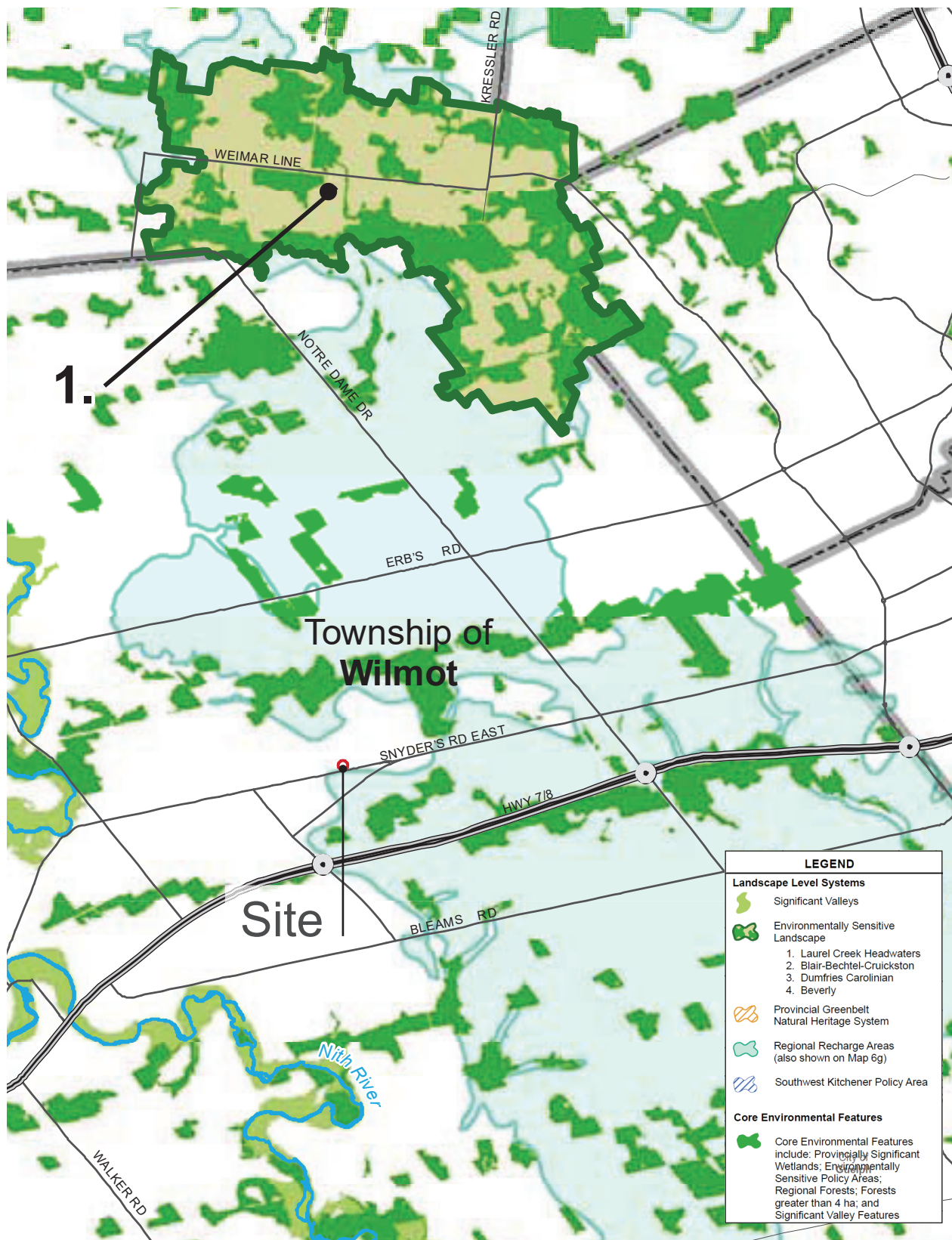
Section 2.E of the Official Plan provides policies governing Township Urban Area Development Policies, stating that such areas will be planned and developed "*to accommodate additional population and employment growth consistent with their traditional role as the focus for social, economic and cultural activities in the townships*".

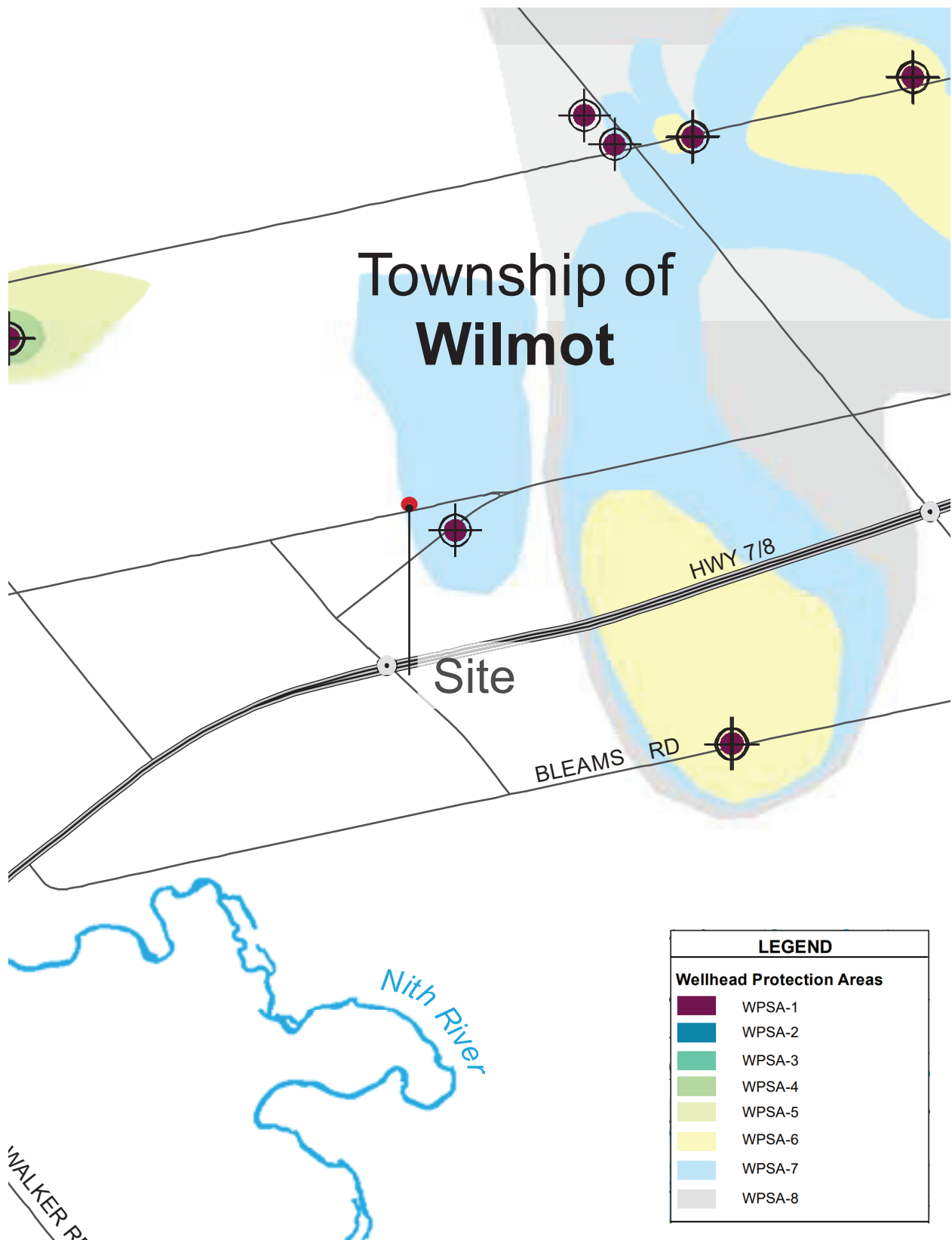
The submitted Zoning By-law Amendment application facilitates the proposed development, which will contribute to the employment growth by providing a larger building for employment uses than currently exists.

The Subject Property is not located within a Landscape Level System or Core Environmental Feature outlined on *Map 4 – Greenlands Network* of the Regional Official Plan (Figure 5). The Subject Property is located within close proximity to a Regional Recharge Area (Figure 6).

The Subject Property is located within a WPSA-7 overlay as shown on *Map 6c – Township of Wilmot Source Water Protection Areas* of the Region of Waterloo Official Plan.

Section 8.A of the Region of Waterloo Official Plan provides policies governing Wellhead Protection Areas. It states that "*The purpose of these designations is to prevent land uses involving hazardous chemicals and/or substances, disease causing organisms and land uses that increase the vulnerability*





of groundwater from becoming water quantity and/or quality risks to municipal drinking-water supply wells”.

The proposed Zoning By-law Amendment would facilitate the development of a four-storey office building and industrial parking lot. Wellheads can be protected through ensuring the quality and quantity of stormwater is managed appropriately on-site.

A Functional Servicing and Stormwater Management Report was prepared by MTE on June 27, 2024. The report includes recommendations for stormwater management which can be designed to ensure the long-term health and continued natural functions of surrounding environmental features.

Regarding infiltration, the report states that *“Pre-development infiltration volumes are to be maintained in the post-development condition of the Site to ensure sufficient groundwater recharge”.*

Regarding water quality control, the report states:

A snout will be installed within each catchbasin to provide water quality control for the Site. The snout prevents debris (gas, oil, leaves, etc.) from entering the storm system, but will not provide enhanced, 80% TSS removal, water quality treatment. An oil-grit separator (OGS) will not be feasible on the Site due to the shallow depth of the existing 825mm Regional storm sewer and the limited amount of fill permitted across the Site.

A minimum sump of 1.0m for all storm structures will also be implemented to help reduce the amount of sediment entering the storm system.

The requested zoning by-law amendment application conforms to the policies of the Region of Waterloo Official Plan

5.1.5 Township of Wilmot Official Plan

The Subject Property is located within the Urban Area Boundary on *Map 4.1 – Baden Urban Area* of the Township of Wilmot Official Plan (Figure 7).

Section 2.1.1 of the Township of Wilmot Official Plan provides policy direction for Urban Areas, stating that *“The Baden and New Hamburg Urban Areas are designated on Maps 2.1, 2.2, 4.1 and 4.2 of this Plan. This urban designation, which corresponds with the “Township Urban Areas” designation in the Regional Official Plan, will be planned to accommodate a broad range and mix of land uses and serve as the primary focus for population and employment growth in the Township to the year 2031”.*

The submitted Zoning By-law Amendment application facilitates the proposed development, which is located within an Urban Area and will contribute to the employment growth in the Township.

The Subject Property is designated Urban Residential on *Map 4.1 – Baden Urban Area* of the Township of Wilmot Official Plan (Figure 7). An Environmentally Constrained Lands overlay applies to the Subject Property.

5.1.6 Township of Wilmot Zoning By-law 83-38

The submitted Zoning By-law Amendment requests site-specific exception to permit an increase to the maximum building height to a maximum of four storeys.

Discussion was had early on with City Staff regarding the desired height. A four storey was settled on as an agreeable balance between adequate intensification and consideration for impacts on surrounding properties. Primarily, concerns were raised that a building over four storeys would provide overlook into the rear yards of residential dwellings south of the Subject Property across Snyder's Road East. A road widening provided as part of the submitted Zoning By-law Amendment application will result in Snyder's Road East having a total road width of 30 metres. Between the commitment to maintaining a low-rise form and the 30-metre road width of Snyder's Road East, overlook into the yards of neighbouring residential properties is heavily mitigated. The proposed development now results in the demolition of a low-rise building and the creation of a new low-rise building, maintaining the similar low-rise character of the Subject Property.

The submitted Zoning By-law Amendment requests site-specific exception to permit angled parking, whereas the Zoning By-law does not consider angled parking spaces. The proposed angled parking assists with condensing parking in response to design priorities, including permitting a driveway and parking along Sandhills Road. Angled parking is provided on the Subject Property only where it is required to facilitate the proposed development and create sufficient space for adequate vehicle circulation.

The proposed development satisfies the following provisions of the Zoning By-law outlined in a table extracted from the Site Plan prepared by Walterfedy:

SITE PLAN DATA RE-ZONING APPLICATION				
Planning Information				
Address	430 Snyder's Rd E, Baden, ON N3A 2V7			
Zoning	Z8 (Commercial)			
Site Breakdown		Metric		Imperial
Site Area		9,470	sm	101,934 sf
Total Building Area (GFA)		1,977.19	sm	21,282 sf
Office (GFA)		1,856.5	sm	19,983 sf
Loading Bay (GFA)		120.69	sm	1,299 sf
Building Area (Footprint)		Metric		Imperial
Existing Building Footprint		631	sm	6,792 sf
Allowable Building Footprint		724	sm	7,793 sf
Proposed Building Footprint		618.6	sm	6,658 sf
Setbacks		Required		Provided
Front Yard Setback*		3.048	m	3.048 m
Exterior Side Yard Setback		6.0	m	6.0 m
Min. Side Yard Setback				
(a) Main Building**		*8.0	m	8.0 m
(b) Accessory Building		1.0	m	1.0 m
Min. Rear Yard Setback				
(a) Main Building		7.5	m	7.5 m
(b) Accessory Building		1.0	m	1.0 m
Buffer Strips		Required		Provided
Min. Landscaped Strip		1.0	m	1.0 m
Min. Buffer Strip (abut. Res)		1.5	m	1.5 m
Max. Building Height		Maximum		Provided
(a) Main Building***		**	m	16.9 m
(b) Accessory Buildings		4.5	m	4.5 m
Building Coverage		Maximum		Provided
Max. Lot Coverage (50%)		4,735	sm	618.6 sm
Parking		Required		Provided
Office (1 per 30sqm)		62		63
BF Parking (4% of total)		3		3

* Previously approved minor variances include front yard setback reduction from 7.6m to 3.048m.

**Min. sideyard for main building equal to 1/2 building height but in no case less than 3m.

***Max. main building height is two (2) storeys.

All outdoor storage shall be located in the side or rear yard and shall not be located within 4.5m of any lot line.

All outdoor storage areas shall be enclosed within a solid wall or fence with a minimum height of 1.8m in order to shield such areas from public view.

Overall, the requested site-specific exceptions are core the functionality of the proposed development and do not result in any significant negative impact on surrounding properties and satisfies the remaining applicable provisions of the Zoning By-law.

The existed and proposed land uses are not contemplated by the Urban Residential designation but demonstrate conformity with the Official Plan in other ways.

Section 10.20 contains policies that govern existing uses, stating that *“Notwithstanding the provisions of this Plan, it is the policy of the Township that any lands used for any legally existing purpose in any designation for which no provision is made by this Plan for such activity to be undertaken, may continue to be used for such purpose”*.

Furthermore, Section 10.20 of the Township of Wilmot Official Plan states:

10.20.2 Subject to the provisions of Chapters 2 to 10 inclusive of this Plan, Council may pass by-laws or otherwise facilitate the continuation, extension or enlargement of such uses within the confines of the lands on which the activity is located without amendment to this Plan, provided that:

- a) the existing use is an appropriate use of such lands and its continuation, enlargement or extension will not have a detrimental impact on the surrounding land uses; and
- b) such actions by Council do not provide for the expansion of the existing use onto adjoining lands.

The submitted Zoning By-law will facilitate the proposed development, which seeks to enlarge an existing use on the Subject Property. The proposed development has regard to the criteria set out in Section 10.20.2 of the Township of Wilmot Official Plan.

The Subject Property has excess area to provide appropriate space both the proposed four-story office and industrial parking. The proposed low-rise height (4-storeys) will provide for employment intensification while minimizing overlook into neighbouring yards. Mature trees along both Snyder's Road East and Sandhills Road further reduce oversight. Other surrounding land uses include woodlands and industrial uses where the proposed development will have no adverse impact.

The submitted Zoning By-law Amendment and proposed development are isolated to the Subject Property and will not result in the existing use expanding onto adjoining lands.



The proposed development was originally necessitated by safety concerns with the existing building which would require demolition. The proposed development is consistent overall with Provincial, Regional and Municipal priorities and provides an opportunity to increase the employment density and site design quality through the submitted Zoning By-law Amendment and the proposed development.

Section 8.2 of the Township of Wilmot Official Plan provides policy applicable to the portion of the Subject Property located within an Environmentally Constrained Lands overlay.

Generally, development and a large array of uses, including the proposed land uses, are not permitted within Environmentally Constrained Lands except where:

A two-zone policy area has been designated in accordance with the policies of the Regional Official Plan to permit development or site alteration in the flood fringe, and the effects and risk to public safety are minor so as to be managed or mitigated in accordance with the Province's standards, as determined by the demonstration and achievement of all of the following:

- a) development or site alteration is carried out in accordance with floodproofing standards, protection works standards, and access standards;
- b) vehicles and people have a way of safely entering and exiting the area during times of flooding, erosion and other emergencies;
- c) new hazards are not created and existing hazards are not aggravated; and
- d) no adverse environmental impacts will result (Section 8.2.5).

Extensive discussions have been had with the Grand River Conservation Authority regarding the proposed development and site alterations. These discussions centred around natural hazard avoidance and mitigation of any impacts to natural features on and adjacent to the Subject Property. Resulting from these conversations, the owner is now proposing a retaining wall along the northern side of the site to redirect stormwater runoff from the parking lot and outdoor storage away from protected natural features.

The Functional Servicing and Stormwater Management Report provides for a number of controls for managing stormwater quality and quantity. Appropriate management of stormwater can ensure adequate quantity and quality of groundwater recharge and to prevent flooding which would be damaging to environmental features adjacent to the Subject Property.

The Subject Property is not located within a Landscape Level System or Core Environmental Feature outlined on *Map 7 – The Greenlands Network* of the Township of Wilmot Official Plan (Figure 8). The

Subject Property is located in close proximity to a Regional Recharge Area (Figure 9). The Subject Property is located within the regulation limits of the Grand River Conservation Authority (Figure 10).

Overall, the submitted Zoning By-law Amendment will facilitate a proposed development which achieves broader Planning objectives of the Province of Ontario, Region of Waterloo, and Township of Wilmot. The requested Zoning By-law Amendment conforms to the Township of Wilmot Official Plan.

6. Supporting Studies

6.1 Noise Impact Study

A Noise Impact Study was prepared by GHD on April 17, 2024 in support of the submitted Zoning By-law Application.

The Noise Impact Study provides noise modelling and noise abatement analysis based on sound level measurements recently collected at the Subject Property. The study evaluated stationary noise levels from the Development to nearby residential dwellings.

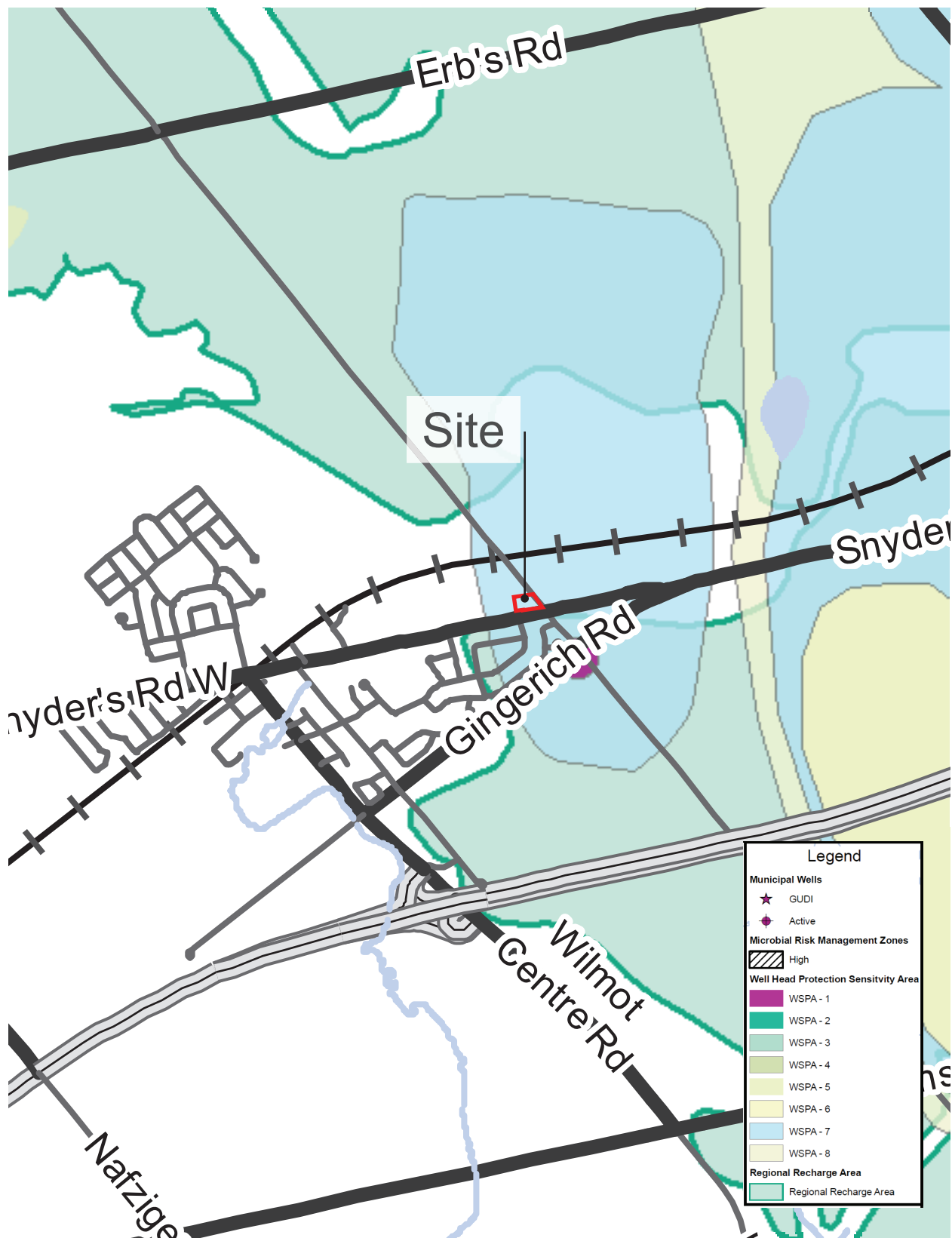
The Noise Impact Study concluded that *“the proposed Development is feasible and will comply with the sound level limits of the MECP, provided that the noise controls recommended in this Study are implemented. The recommended noise controls include an acoustic barrier along the west edge of the proposed trailer parking lot.”*

6.2 Inspection Review

An Inspection Review was conducted by Building Theory on February 21, 2024 which examined the suitability of maintaining the existing office building for retrofitting with the proposed additional height and expanded floor plate.

The Inspection Review concluded that “the existing structure will not be suitable for the expected functions, application, structural performance, and life time of new spaces.... [and] strongly recommend[s] demolishing the existing structure and building a new structure to comply with updated building codes and standards and accommodate the needs, and function of the new space”.







6.3 Geotechnical Investigation

A Geotechnical Investigation was prepared by Chung & Vander Doelen Engineering Ltd. on December 4, 2023 in support of the submitted Zoning By-law Application.

The Investigation utilized boreholes dug as part of the Phase II Environmental Site Assessment also conducted by CVD. Examinations of the boreholes revealed that *“the site is underlain by fill over peat/organic silt deposit to about 2 m deep in the presently proposed building area. Deeper organic deposit could be present towards the north and west of the property. Native loose to compact sand/silty sand extended to 5 m deep, the maximum depth of boreholes. The groundwater table was rather shallow, located at depths of 2 to 3 m below ground surface”*. The Geotechnical Investigation also considered the impacts of footing foundations, engineered fill construction, construction and ground water control, floor slab construction, earthquakes, lateral earth pressure, site servicing (including pipe bedding and trench backfill), and infiltration rate of native soil deposits.

The Geotechnical Investigation concluded that *“CVD has recently completed a Phase II ESA at the site. The report contains additional soil quality and environmental testing results.*

CVD recommends that a disposal plan for excess soils be established to manage the quantity, as well as where and how the excess soils can be disposed of off-site”.

6.4 Functional Servicing Report

A Functional Servicing and Stormwater Management Report was prepared by MTE on June 27, 2024 in support of the submitted Zoning By-law Application.

The Report includes an evaluation of existing topography, existing servicing, and soil conditions to provide preliminary stormwater management design and conclusions regarding the servicing of the proposed development. The report concludes that based on the analysis performed:

- i) The proposed grading design will respect the natural topography of the Site to achieve a minimal cut/fill balance where possible.
- ii) Existing municipal infrastructure for water and sanitary is available along Snyder’s Road East.
- iii) The existing Regional storm sewer infrastructure located within an existing easement through the Site will be realigned as part of the redevelopment.
- iv) The SWM criteria can be satisfied with the implementation of onsite controls for water quantity and water quality.

- v) Enhanced infiltration measures will not be required to maintain pre-development volumes.
- vi) Additional grading, servicing and stormwater management details will be provided during detailed design.

7. Conclusions

The proposed Zoning By-law Amendment has regard for matters of provincial interest, achieves employment growth consistent with the PPS and conforms to the Growth Plan and the policies of the Regional and Township Official Plans. The zoning by-law amendment and future proposed development make efficient use municipal services, energy, and utilities, and will result in the continued operation of a land use which is permitted by the Township of Wilmot Zoning By-law.

The proposed Zoning By-law Amendment aligns with broader planning objectives and represents good land use planning.

Should you have any questions regarding these applications, please do not hesitate to contact us.
Yours truly,



Caleb Miller
Planner

office: 519.569.8883
direct: 226.243.7298
email: cmiller@gspgroup.ca



72 Victoria Street South
Suite 201
Kitchener, ON N2G 4Y9

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Heather Price MCIP RPP
Vice President /
Development Planning Manager

office: 519.569.8883
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APPENDIX A

Caleb Miller

From: Heather Price
Sent: June 3, 2024 4:22 PM
To: Caleb Miller
Subject: FW: 430 Snyder's Road East- Request for Pre-submission Consultation
Attachments: 15224.pdf; 15332.pdf; Regional Pre-Sub Comments - 430 Snyder_s Rd E (WIL).DOCX; 2023-11-17 430 Snyders Rd E GRCA comments.pdf; GRCA Map.pdf

Heather Price MCIP RPP
Vice President /
Development Planning Manager

office: 519.569.8883
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Please be advised that summer hours are in effect and during this time my typical working hours are Monday to Thursday (8:30am to 5:00pm) and Fridays (8:30am to 1pm).

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From: Andrew Martin <andrew.martin@Wilmot.ca>
Sent: Sunday, November 26, 2023 9:44 AM
To: Heather Price <hprice@gspgroup.ca>
Cc: Caleb Miller <cmiller@gspgroup.ca>; Adam Baier <adam@alderconcrete.ca>; Benjamin Gregory <bgregory@walterfeddy.com>; Sheng Low <slow@walterfeddy.com>
Subject: RE: 430 Snyder's Road East- Request for Pre-submission Consultation

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Good morning Heather,
The following is a summary of pre-submission comments.

GRCA – see attached
Region – see attached

Township:

Given the nature of the requested amendments to the zoning, the Township does not consider the request to fall within the scope of a minor variance (particularly the building height increase). A such, a zoning amendment application would be required to increase the maximum building height from 2-storeys to 4-storeys and to address parking layout regulations (width of drive aisle and angle parking dimensions).

Site plan details to be incorporated in submission (in addition to comments received from the Region and GRCA)

1. Parking areas and access are required to be delineated with barrier curb. The exception would be the north property line where a 1.5m chain link fence is to be provided to prevent future encroachments into the GRCA regulated area.
2. All parking and storage areas are required to be hard surfaced with hot mix asphalt, concrete or similar. Gravel and recycled asphalt will not be accepted.
3. Please provide more details on the trailer storage area: how many trailers anticipated, size, type, anything else being stored etc.
4. Trucks entering and existing the site are to come from Sandhills Road. The site plan is to incorporate details on all vehicle movements on site as well as movements entering and existing the property including associated turning templates based on the largest vehicle anticipated in the applicable areas of the site.
 - a. Analysis will need to be provided to demonstrate that the entrances are not anticipated to cause unwarranted queuing at the intersection of Snyders Road and Sandhills Road.
 - b. The plan is to demonstrate that the angle parking and associated access aisle dimensions are sufficient to accommodated entering and existing the parking spaces.
5. Location of all fencing proposed on site to be shown along with a detail of the proposed fence (dimensions material etc.)
 - a. A 1.8m solid wood fence is required along the west property line or between the edge of the trailer parking area and the property line. This is required unless the abutting residential property owner provides a letter indicating that they do not require a fence.
 - b. A 1.8m solid wood fencing is to be provided at the 4.5m outdoor storage setback from Snyder's Road to shield the storage area from Snyder's Road East. Within the 4.5m setback landscaping and tree planting to be provided.
6. Location of waste enclosure or inground style waste receptacles to be identified.
7. Compliance with OBC requirements for water service size, fire route requirements, and proximity to fire hydrants etc. will need to be demonstrated.
8. All exterior lighting to be shown along with details of lighting fixtures, height etc.
 - a. A photometric plan will need to be provided demonstrating that all exterior lights do not project light beyond the property line (measure "0" on the photometric plan).
9. The plan identifies the proposed Snyder's Rd entrance in the location of a recently installed fire hydrant. Consider revising the entrance location to provide a minimum of 1.5m clearance from the hydrant.
10. A copy of the easement storm sewer easement document bisecting the property is required. The building cannot be constructed over the storm sewer, so the easement will need to be relocated in consultation with the Township and parties to the easement agreement.
11. Show the locations of all services and connections to municipal infrastructure. (As built drawings from the Snyder's Rd reconstruction are attached.)
 - a. Sanitary flows are presently discharged via private forcemain (internal to the site) to a sanitary lateral located opposite from Schneller Drive. Provide details and calculations demonstrating how the sanitary will be relocated and connected to the existing sanitary sewage system in Snyders Road providing adequate capacity for the proposed development (and given the need to relocated outside of the road widening required by the Region).
 - b. Show the existing/new water service to the 300m watermain on Snyder's Road.
 - c. See Region's comments regarding regional storm sewers.
12. Provide a lot grading and drainage plan demonstrating that grading and drainage will not negatively impact adjacent properties.
13. A stormwater management (SWM) brief outlining the storm water management quantity and quality requirements to meet pre to post development levels for this site shall be provided. Quantity control should be to existing discharge rates and quality control to enhanced (80% removal of suspended solids) water quality standards. The SWM storage volume shall restrict the post development flow rate to the pre-development flow rate for all rainfall events up to and including the 100-year rainfall event. Within the design brief please include pre-development and post development catchment area drawings and calculations to support SWM features. Please model using DGSSMS rainfall intensity parameters and return periods

- a. Please provide statement in conclusion of SWM brief and on the servicing & grading plan stating: “The Engineer/Designer hereby certifies that the proposed lot drainage and/or grading plan(s) have been designed in accordance with drainage common law in Ontario, sound engineering principles and the Ontario Building Code Articles such as but not limited to 9.14.6.1 & 9.15.4.6. The Engineer/Designer ensures artificially collected and/or surface drainage will not adversely affect adjacent properties”.
14. Provide an erosion and sediment control plan to demonstrate how the erosion and sediment control will take place during the construction activities.
15. Verify the groundwater levels in the proposed area and ensure that proposed infrastructure including the SWM system, sanitary septic and watermain will not be impacted by groundwater. Per the recent construction on Snyders Road GW is estimated at approximately 354.20m (BHMW 22 Pinchin File 244512.001 January 18, 2021). If dewatering is required during construction, it is the responsibility of the applicant to obtain a Permit to Take Water or an Environmental Activity and Sector Registry. Any reports supporting a PTTW or EASR shall be forwarded to the Township if required.



16. A noise study is required to demonstrate that truck movements and the building’s mechanical equipment will be mitigated to comply with Provincial requirements for noise attenuation related to neighbouring residential properties on all sides of the property.

Application process

Pre-application approvals

Given Bill 109 implications for development review time frames, we will need GRCA to provide preliminary acceptance of the development concept (as updated to address pre-submission comments) and related comments prior to acceptance of the zoning amendment application. Preliminary technical documents related to functional servicing, swm, lot grading and drainage, and will need to have obtained acceptance from the Township and/or Region of Waterloo. The noise study will need to be approved by the Township in consultation with a third party consultant.

Fees:

Township Engineering \$325

Third party review fees for noise study (Township costs)

Zoning amendment

Submission of all documents accepted through pre-application approvals.

Preliminary building elevations/renderings to assist with public process.

Fees (may be subject to change after January 1, 2023):
Application and associated fees \$5700
Region of Waterloo review fee as noted in comments
GRCA review fee as noted in comments

Site plan control

Submission of final versions of all plans and technical documents accepted through the pre-application approvals/zoning process.
Photometric analysis.

Fees (may be subject to change after January 1, 2023):
Application fee \$5390
Township Engineering review fees \$4910
Region of Waterloo review fee as noted in comments
GRCA review fee as noted in comments

Next steps

If you would like to meet to discuss further, please provide some dates and times and we can coordinate a meeting accordingly.



Andrew Martin, MCIP RPP
Manager of Planning and Economic Development
Development Services | Township of Wilmot | 519-634-8519 x. 9245

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From: Heather Price <hprice@gspgroup.ca>
Sent: Thursday, November 2, 2023 3:03 PM
To: Andrew Martin <andrew.martin@Wilmot.ca>
Cc: Caleb Miller <cmiller@gspgroup.ca>; Adam Baier <adam@alderconcrete.ca>; Benjamin Gregory <bggregory@walterfedy.com>; Sheng Low <slow@walterfedy.com>
Subject: RE: 430 Snyder's Road East- Request for Pre-submission Consultation

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

Hi Andrew,
Please refer to the enclosed covering letter and plan (minor correction).

Thanks,

Heather Price MCIP RPP
Vice President /
Development Planning Manager



office: 519.569.8883
direct: 226.243.7320
email: hprice@gspgroup.ca



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From: Heather Price

Sent: Thursday, November 2, 2023 2:43 PM

To: andrew.martin@Wilmot.ca

Cc: Caleb Miller <cmiller@gspgroup.ca>; Adam Baier <adam@alderconcrete.ca>; Benjamin Gregory <bgregory@walterfedy.com>; Sheng Low <slow@walterfedy.com>

Subject: 430 Snyder's Road East- Request for Pre-submission Consultation

Good afternoon Andrew,

Please find enclosed a request for pre-submission consultation for the above-noted address, along with the concept plan. A copy of these materials with the cheques will be delivered to your attention. Please confirm your receipt of this submission and timing of when we can expect to receive comments. We would appreciate if comments could be sent before Nov 17, if possible.

Thank-you,

Heather Price MCIP RPP
Vice President /
Development Planning Manager

office: 519.569.8883
direct: 226.243.7320
email: hprice@gspgroup.ca



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