



DEVELOPMENT SERVICES

Staff Report

REPORT NO: DS-2026-06

TO: Committee of the Whole on April 13, 2026

SUBMITTED BY: Andrew Martin, MCIP RPP, Director of Development Services

PREPARED BY: Andrew Martin, MCIP RPP, Director of Development Services

REVIEWED BY: Jeff Willmer, Chief Administrative Officer

DATE: April 1, 2026

SUBJECT: Draft Plan of Subdivision 30T-22602 and Zone Change Application 11-22, Activa Holdings, Baden

RECOMMENDATION:

THAT Report DS-2026-06, Draft Plan of Subdivision 30T-22602 and Zone Change Application 11-22, Activa Holdings, Baden, be received for information.

SUMMARY:

The Township of Wilmot is in receipt of applications for Draft Plan of Subdivision and changes to the Township Zoning By-law. The lands to which these applications apply are presently undeveloped and located on the north side of Baden, north of Michael Myers Road, Goldschmidt Crescent and Kropf Drive. The lands are designated Urban Residential in the Township Official Plan and are presently zoned Zone 1 (Agricultural) within the Township Zoning By-law 83-38, as amended.

These applications were previously considered at a Public Meeting in July 2023. The application has seen minor revisions since then. Given that almost three years has passed since the initial Public Meeting, this report has been prepared as an updated summary to accompany an additional Public Meeting.

This report provides a summary of the draft plan of subdivision and associated zone change applications that have been filed for the subject property along with comments received to date

BACKGROUND:

A Public Meeting was first held related to these applications on July 24, 2023. Notice of the current Public Meeting was given to property owners within 120 metres of the subject lands on March 12, 2026. The following is a summary of comments received prior to the preparation of this report.

Public

(complete comments included as Attachment C)

Deborah Baker, Baden – opposed to development expressing concerns with density, traffic, impact on schools, and lack of parkland and trails.

Keith Hori, Baden – concerns with construction traffic and the associated safety hazard along with dirt, debris and air quality.

Rory Campbell, Baden – concerns with setback between existing and new neighbourhoods and traffic.

Grant Mattis, Baden – concerns with environmental impact study, the width of the trail between the existing and new neighbourhood, density, and traffic.

John Will, Baden – comments at the July 2023 public meeting expressing concerns with width of the trail between the existing and new neighbourhood along with traffic concerns.

Mike Sooley, Baden – comments at the July 2023 public meeting and subsequent written comments expressing concerns with width of the trail between the existing and new neighbourhood, proposed density, and financial impact on the community.

Alex Sooley, Baden – concerns with financial impact on the community, density, prolonged construction activities, traffic, and adequacy of environmental studies.

Agencies

Bell Canada – requesting necessary easements and/or agreements to service this new development to the satisfaction of Bell Canada

Canada Post – requesting draft approval conditions relative to the provisioning for community mailbox locations and standards

Hydro One – requesting draft approval conditions relating to lot grading and drainage approvals as well as protection provisions for development adjacent to the hydro corridor, if applicable

WCDSB – concerns with the ability of Holy Family to meet forecasted enrollment and expressing that the new Catholic elementary school in Baden is critical to accommodating growth.

WRDSB – requesting draft approval conditions to inform future purchasers of potential temporary school and bus accommodations should existing facilities be at capacity.

Region of Waterloo – indicating no concerns and including requested draft approval conditions related to servicing allocation and, for multiple residential blocks, the completion of a salt management plan prior to site plan approval.

Grand River Conservation Authority – recommending draft approval subject to conditions related to approval of storm water management, lot grading, erosion and siltation control, and servicing plans.

REPORT:

The lands subject to these applications were added to the Baden Urban Area as part of the Township's Official Plan review and boundary rationalization process that was undertaken

starting in 2017 and approved in April 2019 along with minor amendments to the boundary through Provincial approval of Bill 162 in May 2024.

Since the July 2023 public meeting minor amendments were made to the draft plan layout and area to which it applies.

Draft Plan of subdivision application 30T-22602

July 2023 proposal	April 2026 proposal
17.97ha	25.492ha (the plan now includes the wetland and woodland area as a block in the plan)
300-375 dwelling units in the form of single detached, townhouse, and other multiple dwellings	302-431 dwelling units in the form of single detached, townhouse, and other multiple dwellings. The plan revised the block configuration between Street Four and Street 5 to reflect back-to-back townhouse units.
The plan includes a storm water management area and an integrated trail network that will be interconnected with existing and future sidewalks, trails and walkways.	The plan continues to include the same features, but also includes an open space block (wetland and woodland area) to be conveyed to the Township.

The updated draft plan is included as Attachment A.

Zone change application 11/22

The zoning by-law amendment continues to implement the draft plan of subdivision. Development blocks neighbouring existing residential properties on the south side of the subject property are proposed to be zoned Zone 2b (Residential), which would permit single detached dwellings and accessory uses as currently permitted within that zone unchanged from the July 2023 proposal.

The remainder of the development was previously proposed to contain a mixture of single, street townhomes and back-to-back townhomes with heights of up to 12.5m reflective of a 3-storey building. The application continues to propose a mixture of unit types now including apartments within the two multiple residential blocks. Proposed building heights now include up to 4-storeys for back-to-back townhomes within the back-to-back blocks (Blocks 5 and 6) on the proposed draft plan, as well as back-to-back townhomes up to 4-storeys and apartment buildings of up to 6-storeys within the multiple residential blocks (Block 16 and 17) on the proposed draft plan.

The stormwater management block, open space area, and trail network would be zoned Zone 11 (Open Space).

Development details

Street One within this proposed plan will form part of a collector road located east-west through the subdivision and ultimately connecting to Snyder's Road East via the abutting proposed residential development to the west. Indirect connection is provided to Jacob Cressman Drive to encourage traffic movement to the west. The collector road is anticipated to carry the majority of traffic directly to Snyder's Road East and will be the construction access to the development.

To address perceived traffic concerns related to traffic through the existing Activa development, the applicant has provided a number of proposed traffic calming measures designed to slow traffic and encourage use of Street One as opposed to Jacob Cressman Drive and Isaac Shantz Drive. These measures are included as Attachment B.

The plan includes trail corridors, in addition to neighbourhood sidewalks, to provide integration to the overall trail network in Baden and provide connectivity to existing and proposed schools as well as transit opportunities on Snyder's Road.

The purpose of this report is to summarize the purpose of the applications that have been filed, and to include comments received through the public circulation process preceding the Public Meeting.

At such time as any additional comments received at the Public Meeting are considered and review of all updated technical documents provided in support of the applications have been completed and accepted by internal departments and external agencies, staff will return to Council with a detailed report and recommendation on the application including a summary of all comments received and how they have been addressed.

ALIGNMENT WITH THE TOWNSHIP OF WILMOT STRATEGIC PLAN:

Prosperous Businesses & Balanced Growth

FINANCIAL CONSIDERATIONS:

The application fees, established by the Township of Wilmot Fees and Charges By-law, were collected at the time of application.

ATTACHMENTS:

Attachment A	Proposed draft plan of subdivision
Attachment B	Proposed traffic calming measures
Attachment C	Public comments
Attachment D	Proposed zoning schedule

DRAFT PLAN OF SUBDIVISION

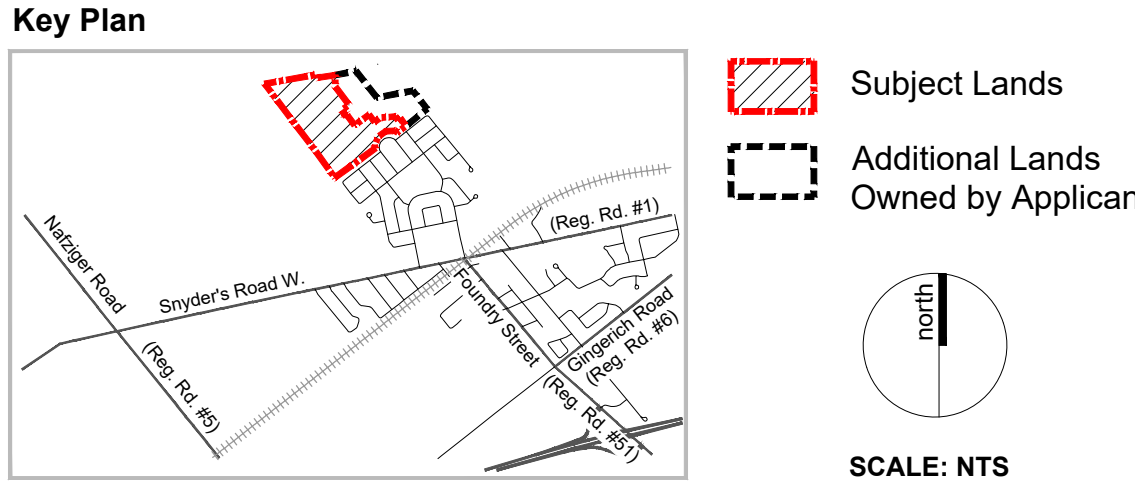
Legal Description
PART OF LOTS 14 AND 15,
CONCESSION NORTH OF SNIDER'S ROAD
TOWNSHIP OF WILMOT
REGION OF WATERLOO

Owner's Certificate
I HEREBY AUTHORIZE MACNAUGHTON HERMSEN BRITTON CLARKSON PLANNING LIMITED
TO SUBMIT THIS PLAN FOR APPROVAL.

Date: March 10, 2021
Peter Ambruster
Vice President Community Development
(Activa Holdings Inc.)

Surveyor's Certificate
I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED ON THIS PLAN AND
THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE ACCURATELY AND CORRECTLY SHOWN.

Date: January 13, 2026
Jason Finch, OLS
(Stantec Geomatics Ltd.)



Additional Information Required Under Section 51(17) of the Planning Act
R.S.O. 1990, c.P.13 as Amended

A. AS SHOWN B. AS SHOWN C. AS SHOWN
D. RESIDENTIAL, MULTIPLE RESIDENTIAL, STORMWATER MANAGEMENT, OPEN SPACE
E. AS SHOWN F. AS SHOWN G. AS SHOWN H. MUNICIPAL WATER SUPPLY
I. CLAY/SANDY LOAM J. AS SHOWN K. ALL SERVICES AS REQUIRED L. AS SHOWN

Area Schedule 30T-22602				
Description*	Blocks	Units (min/max)	% of Unit Total	Area (ha)
Residential (Singles, Street Towns, Back to Backs)**	1-15	185-274	62-64	6.781
Multiple Residential (Townhomes)***	16,17	117-157	38-36	3.536
Stormwater Management Facility	18			2.478
Open Space	19			7.447
Hydro Corridor	20			0.721
Trail	21,22			0.112
Trail/Drainage Corridor	23			0.259
Drainage Corridor	24			0.321
Walkway	25			0.045
0.3m Reserves	26-32			0.010
Roads				3.782
Total	32	302-431	100%	25.492

*Blocks shown on Draft Plan are 'Residential' unless otherwise specified.
** Unit yield:
Z2b Zone - Minimum unit yield is based on a lot width of 13.11 m (43 ft) (Blocks 1,3,4,7,12,13,14,15)
- Maximum unit yield is based on a lot width of 10.97 m (36 ft)
Z2c Zone - Minimum unit yield is based on a lot width of 13.11 m (36 ft) (Blocks 2,8,9,10,11)
- Maximum unit yield is based on a lot width of 5.5 m (18 ft)
Z3 Zone - Blocks 5 and 6 assumes Back to Back freehold townhomes for minimum and maximum units based on Concept Plan.
*** For the Multiple Residential blocks the number of units assumes Concept Plans (Cluster Townhomes).
Notes
1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE SHOWN.
2. A PORTION OF THE SITE BOUNDARY AND LEGAL BASE PLAN PREPARED BY STANTEC GEOMATICS LTD.
3. TOPOGRAPHIC AND EXISTING FEATURES SURVEY COMPLETED BY STANTEC.
4. ADJACENT PARCEL FABRIC IS FROM REGION OF WATERLOO OPEN DATA AND IS APPROXIMATE.
5. WETLAND AND CORE ENVIRONMENTAL FEATURE LIMITS FROM STANTEC, CONFIRMED/SURVEYED AUG. 20, 2020.

6.	Jan. 9, 2026	For re-submission to Region of Waterloo/Township of Wilmot; DGS
5.	Oct. 1, 2025	For re-submission to Region of Waterloo/Township of Wilmot; DGS
4.	Jun. 3, 2024	For re-submission to Region of Waterloo/Township of Wilmot; DGS
3.	May 2, 2023	For re-submission to Region of Waterloo/Township of Wilmot; DGS
2.	Sept. 12, 2022	For submission to Region of Waterloo/Township of Wilmot; DGS
1.	Nov. 19, 2019	For Pre-application meeting with Region of Waterloo; DGS
Rev. No.	Date	Issued / Revision By

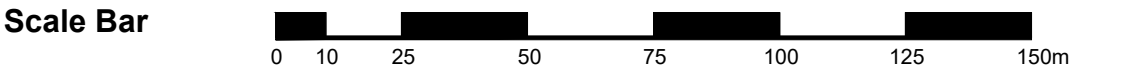
PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

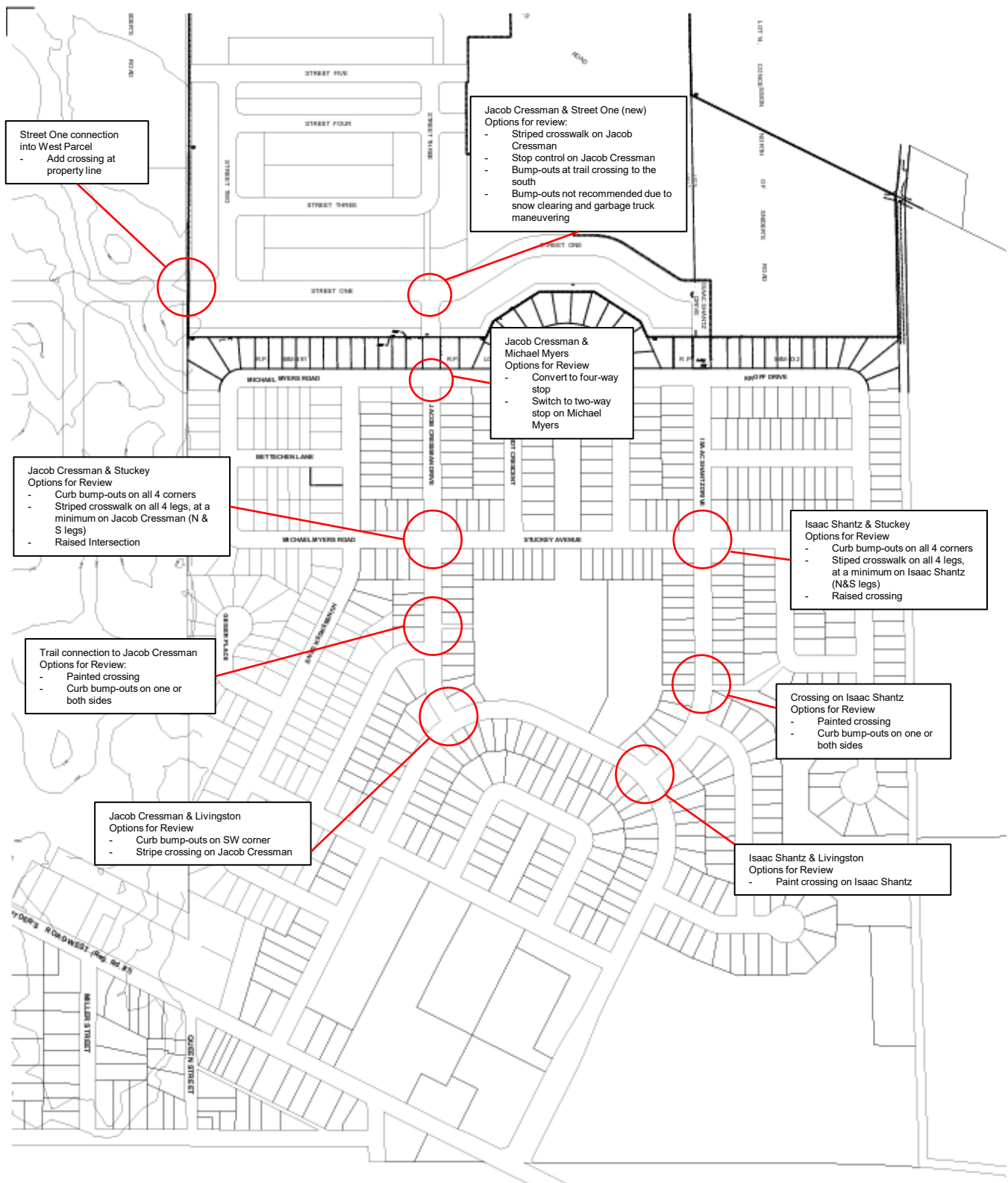
200-540 BINGEMAN'S CENTRE DR. KITCHENER, ON. N2B 3X9 | P: 519.576.3650 | WWW.MHBCPLAN.COM

Approval Stamp	Date January 9, 2026
File No.	8784BB
Plan Scale	1:1,500 (24x36)
Drawn By	DGS
Checked By	PC
Project	Baden Lands
Applicant	

Activa Holdings Inc.
55 Columbia Street East
Waterloo, ON. P:519-886-9400

File Name DRAFT PLAN OF SUBDIVISION





From: Ke Jo
Sent: Friday, July 14, 2023 2:42 PM
To: Planning
Subject: Re: Subdivision in Baden

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.

Sorry can you also tell us where blocks 21 and 22 will be for multi residential because it looks like storm management and a trail land, and what would the density be like here?

> On Jul 14, 2023, at 2:24 PM, Ke Jo wrote:

>

> Hello,

> we are concerned about how they will access the new subdivision with trucks and large equipment? Can you comment on this and the traffic and safety hazard that will be created.

>

> Which areas will be high density on the plan.

>

> How will dirt and debris reduction and especially air quality be maintained during construction.

>

> Thank you, Keith

From: Grant Mattis

Sent: Monday, July 24, 2023 12:26 AM

To: Clerks <clerks@wilmot.ca>

Subject: Development Application ZCA-11-22 meeting on July 24th

Hello Wilmot Clerks,

I would like to enter a few items to be considered by Council before a decision is made to proceed with the rezoning application ZCA-11-22, north of Michael Myers Rd in Baden. If it's necessary for me to speak at the public meeting on July 24 for Councillors to be aware of these concerns, I will, but if this email is all that's required for Council to consider these points, that is also fine. My concerns are around the Scoped Environmental Impact Study, the 10m allowance for a trail, and the abnormal increase in density at the furthest point from access.

I worry the sample locations in the Environmental Impact Study resulted in reports of an extremely low number of a protected species and failed to capture that their breeding grounds are directly in the development area. The study did find 4 killdeer, but no breeding locations. I can tell you from personal experience that there were more than 4 killdeer babies on my property and there are a significant number in the fields every year. I believe the sample locations led to a significant miss of this species and I'm concerned there could be other endangered species in the same area that have not been identified in the study at all based on limited sample locations.

My other concern is the likely cost to Wilmot for trail/path development in the designated 10m allowance beyond my property. I have included a couple pictures here showing the land and grade

extending 10m from the edge of my property line. Both pictures are level and show a yellow tape measure at exactly 33ft. There is an approximate 5ft drop from the property line to the 10m location. It appears this is similar or larger for most properties on Michael Myers, Goldschmidt, and Kropf. I believe to create a usable trail in the 10m space, a retaining wall would be required at a very significant cost to the residents of Wilmot. I have also noticed this 10m width is not in keeping with other paths in the area as they are 30m wide. I propose the path allowance be increased to 30m to allow the natural grade to be maintained, to eliminate the need for an expensive retaining wall, and to have enough space for a path consistent with the others in the area.

My final concern is that the proposed plan is much more dense than the existing neighbourhood and does not keep with the existing feel. Typically the density of a neighbourhood decreases with distance from the access point, but in this case it appears to increase. I believe Jacob Cressman and Isaac Shantz cannot safely support the increase in traffic.

Again, I'm happy to address my points in the meeting if that's required, but if this email is sufficient to ensure these concerns are identified and considered by Council, that is my primary focus and I will allow others the opportunity to voice their opinions in person.

Thank you for your kind consideration.

Grant Mattis



From: [Rory Campbell](#)
To: [Andrew Martin](#)
Cc: [Clerks](#); [Planning](#)
Subject: Re: Written Delegation Submission for 30T-22602
Date: March 19, 2026 12:06:33 PM

Hello again Andrew,

I am writing to the revised draft plan for subdivision 30T-22602. The 2026 proposal contradicts specific assurances made to the community.

Key Points of Contention:

1. The current plan fails to include an increased easement between the existing and new subdivisions. Despite the expanded land area (to 25.492 ha), the plan offers no change to the buffer, ignoring community requests and prior commitments regarding neighborhood separation.
2. The proposed 2 and 4-way stops address symptoms rather than the root cause of congestion. I reiterate the formal request to **de-link the cul-de-sacs**. Maintaining these connections invites through-traffic into established school zones, creating an avoidable safety risk. The 2026 draft sees **more** units being added, new traffic must be directed to new trunk roads.

Existing residents have acted in good faith, making significant financial investments in our properties **in direct reliance on the vision and assurances** shared by Council and the Developers. We were assured multiple times that this would remain a unique community and that "**there will be a clear separation between the new and the old**" (see my previous email). The 2026 proposal is a direct contradiction of those assurances.

I look forward to these concerns being addressed on the record at the April 13th meeting.

Rory

On Sun, Jul 23, 2023 at 8:14 AM Rory Campbell wrote:

Thanks for your reply Andrew.

Enjoy your weekend!

On Sun., Jul. 23, 2023, 7:20 a.m. Andrew Martin wrote:

Hi Rory,

Thank you for your comments. They will be included within a future report prepared for Council and publicly available before any decisions are made on the application.

With respect to your questions that you've requested to be removed from the public record, I provide the following responses.

1. What will be the yard dimensions of the house that will be behind mine? The proposal looks as though there will be a very small yard.

The specific property dimensions are not set out at this time, but the zoning for the block immediately behind the homes on Michael Myers are proposed to be Zone 2b which is the same zone in which your property is located. As the zoning regulations are not proposed to be changed, the lot sizes and setbacks will be consistent with what is permitted for your property.

2. What will be the elevation of the house behind mine? Will our yard be higher, on level, or lower?

Detailed lot grading and drainage is not available at this stage of the approval. There is a proposed drainage and trail block behind your home. Given existing topography, it is anticipated that the new residential block behind will be at similar elevation. Those details will be determined at the detailed engineering stage.

3. How many stories will the house be behind mine
See answer to question 1. Maximum building height is 10.5m.

From: Rory Campbell
Sent: Friday, July 21, 2023 11:27 PM
To: Clerks <clerks@wilmot.ca>; Planning <Planning@Wilmot.ca>
Subject: Written Delegation Submission for 30T-22602

Please redirect if there is a better form.

The previous statements were made in past meetings re: future development

1. "We will continue to make this development a unique development"
2. "We know which houses you are talking about and we have something special planned for them that you will be happy about, not to worry, there will be a clear separation between the new and the old"

The proposal for 30T-22602 goes against these two statements

1. We appreciate the planned path behind our houses however its width of 33 feet does not match the aesthetic defined in all previous phases (lacking green space, trees and plant life, etc)
2. The number of units speak to Kitchener or Waterloo planning standards - maximizing the number of units with small lot sizes while minimizing green space
3. Traditionally high medium to high density housing is placed near main roads to reduce the number of cars that would have to travel through (unless the plan speaks to including infrastructure out to Sandhills road)
4. The environmental assessment findings for wildlife population skews far too low, especially the killdeer count

We have recently **heavily** invested in home improvements based on comments previously made by our Council and Developers - we were assured multiple times that this will continue to be an unique community and when it does come time to expand "there will be a clear separation between the new and the old"

Below are a few inquiries directed at our situation - Please forward these to a group that can assist with answering these details and remove the following from the public record:

1. What will be the yard dimensions of the house that will be behind mine? The proposal looks as though there will be a very small yard.
2. What will be the elevation of the house behind mine? Will our yard be higher, on level, or lower?
3. How many stories will the house be behind mine

Thank you for your consideration,

Rory Campbell

Michael Myers Road

From: [EngageWR](#)
To: [Planning](#)
Subject: Activa Baden North - Public Comment Form Submission
Date: March 21, 2026 11:41:07 AM

Activa Baden North - Public Comment Form Submission

There has been a submission of the form Activa Baden North - Public Comment through your EngageWR website.

First Name

Deborah

Last Name

Baker

Address

████ Kropf Dr, Baden, On, N3A4S4

Comments

This proposal does not reflect the small community of Baden. The road system is not set up to bring in the large amount of people or traffic through the residential areas. Having large amounts of apartments and multi unit dwellings puts a lot of people in a small area, which tends to bring up issues with pollution, noise, and increased crime. When moving to Baden, we were told there would be houses built eventually. Houses. Not masses of people in small areas. I do have concern with it

bringing down the value of my home, the quality of life, and the safety issues for my children. It's also concerning the amount of building being proposed in this area as a whole due to the water crisis we are currently in.

From: [EngageWR](#)
To: [Planning](#)
Subject: Activa Baden North - Public Comment Form Submission
Date: March 27, 2026 2:26:10 PM

Activa Baden North - Public Comment

Form Submission

There has been a submission of the form Activa Baden North - Public Comment through your EngageWR website.

First Name	Last Name	Address	Email address
Mike	Sooley	████ Kropf Drive	████████████████████

Comments

As a resident of Baden whose property is immediately adjacent to the Subject Lands under consideration for the proposed zoning change, I have a number of concerns with the application, as submitted, namely:

1. Proposed Residential Density is significantly higher than surrounding area.

As submitted, the proposed Zoning Change Application envisions a new residential neighbourhood with a materially greater concentration of residents compared to the existing residential neighbourhood immediately to the south.

More specifically, the existing subdivision is comprised primarily of single family residences, with townhomes representing less than 10% of the total development. The expanded subdivision contemplates multi residential units totaling 36-38% of the total development area. While the provincial Growth Act (2020) prioritizes intensification (in the form of increased residential density), the intention of the Act is to facilitate growth in urban areas, not rural communities like Baden. In fact, Wilmot's Official Plan, section 2.5.1.3 outlines a number of growth policies within the Baden Urban Area, such that any development applications are to be planned and developed in a manner that: "respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur".

Given the material differences in residential density between the proposed and existing neighbourhoods, this would seem to contradict the "spirit" of existing governance already established at both the Provincial and Municipal levels.

2. Unknown financial impact of additional infrastructure required to support new development

As presented, the new development will add an additional 302-451 residential units. Conservatively assuming 2.5 persons per unit, the population of Baden could increase by more than 1,000 people, if the development proceeds. With a current population of approximately 5,000 people, this would represent an increase of more than 20%.

In light of this potential significant population increase, there will undoubtedly be a need to expand local infrastructure to support such growth. Likely new infrastructure investment may include, but not be limited to:

- *water, sewer, stormwater management;
- *roads, traffic management;
- *fire and police services;
- *schools/education;
- *public transit;
- *other municipal services

While the property tax base will undoubtedly increase with the proposed additional residential units, what is the financial impact/municipal level investment required from the region/township to accommodate the incremental population growth?

Will the "new costs" be 100% offset by the additional property tax revenue generated, or will property taxes need to be increased across the board for all Baden residents to effectively subsidize the growth?

In light of historical fiscal/budgetary mismanagement, what assurances can Council provide to existing Baden taxpayers that infrastructure obligations associated with the proposed Application will not result in future extraordinary property tax increases, the likes of which have been imposed on Baden taxpayers the past two years?

Sincerely,

Mike Sooley

Subject: Public Comment – ZCA 11/22 & DPS 30T-22602 (Activa Baden North)

I am writing to provide formal public comments regarding the proposed Draft Plan of Subdivision and Zoning By-law Amendment applications for the Activa Baden North development (ZCA 11/22 & DPS 30T-22602), located north of Michael Myers Road.

There are several important planning and infrastructure concerns that should be carefully considered before approving the proposed Baden North development. To begin, it is important to recognize that large-scale development of this nature can have direct financial implications for existing residents if not properly managed. If infrastructure expansion, servicing, and long-term maintenance costs are not appropriately planned and allocated, there is a risk that these costs may ultimately be passed on to current taxpayers. Given recent increases in property taxes within the Township, and ongoing concerns among residents regarding fiscal management, it is reasonable to question whether the full financial impact of this development has been thoroughly assessed and transparently communicated.

Additionally, as citizens of Baden, we should consider the scale of population growth and whether the Township's existing infrastructure is capable of supporting it. The draft plan indicates a potential yield of approximately 302 to 431 residential units, which could translate to roughly 800 to 1,200 additional residents entering the community. This level of growth would place increased pressure on schools, road networks, hydro and wastewater systems, emergency services, and recreational amenities. Under the Township of Wilmot Official Plan and the Region of Waterloo Official Plan, growth is intended to occur in a manner that is coordinated with available infrastructure and services. Development is not simply about accommodating more residents, but ensuring that communities remain livable, functional, and sustainable as they grow. At this stage, it is not clear that the Township has demonstrated that existing infrastructure can adequately support this scale of expansion without negatively impacting current residents.

This concern becomes even more apparent when looking at the density of development immediately adjacent to existing homes. The draft plan indicates that Block 1, located directly behind our properties, is proposed to contain approximately 23 to 27 residential units. By comparison, the existing neighbourhood in a similar-sized area contains roughly 16 homes. This represents approximately one and a half times the number of units in essentially the same amount of space. While some intensification is expected, this level of increase raises questions about compatibility

with the existing neighbourhood character, which is a key consideration in municipal planning policies. The Township's planning framework emphasizes that new development should be compatible with surrounding land uses, including built form, density, and overall community feel. A development that introduces significantly higher density than what currently exists may not align with those objectives and could lead to increased traffic, parking pressures, and strain on local infrastructure at a very localized level.

In addition to long-term population impacts, there are serious concerns regarding construction and the cumulative effect of ongoing infrastructure work in Baden. Residents have already experienced prolonged road construction and maintenance projects that have spanned multiple years, creating consistent disruptions to daily life. These projects have involved road closures, detours, heavy equipment traffic, and extended timelines that impact safety, accessibility, and overall quality of life. Introducing a large subdivision of this scale would likely result in another multi-year construction process, bringing additional truck traffic, noise, dust, and congestion to an already strained road network. The Township's own planning principles emphasize the importance of minimizing disruption to existing communities and ensuring that infrastructure is delivered efficiently and responsibly. Given the history of lengthy, poorly managed construction in the area, it is reasonable to question whether adding another major development at this time is appropriate, or whether it would compound existing issues rather than resolve them.

Traffic impacts further reinforce this concern. The supporting traffic documentation already proposes numerous traffic-calming measures, including curb bump-outs, raised crossings, and intersection modifications, which suggests that the surrounding road network may already be experiencing pressure or safety concerns. When a development requires this level of mitigation at the planning stage, it raises legitimate questions about whether the existing infrastructure is truly capable of accommodating additional traffic volumes. The Region of Waterloo Official Plan places strong emphasis on maintaining safe and efficient transportation systems, and any development that introduces substantial new traffic should clearly demonstrate that these standards can be upheld.

Environmental considerations also remain a critical issue. The Environmental Impact Study (EIS) supporting this development is largely based on data collected between 2019 and 2020, with only limited updates in subsequent years. Given that several years have passed, and considering the pace of development and environmental change in the area, it is reasonable to question whether this

information still accurately reflects current site conditions. Municipal and regional planning policies require that environmental decisions be based on accurate and up-to-date information, particularly when sensitive natural features are involved.

This is especially important given the site's proximity to the Phillipsburg Southeast Wetland Complex, a locally significant wetland system that provides important ecological functions such as groundwater recharge, flood attenuation, and habitat for species of concern. The Environmental Impact Study acknowledges that the subject lands contribute surface water flows toward this wetland system, meaning that changes to land use could alter hydrological patterns. Even small changes in groundwater recharge or surface drainage can have long-term impacts on wetland health. Both the Provincial Planning Statement (2024) and local planning policies require that development demonstrate no negative impact on natural heritage features and their ecological functions. At this stage, it is not clear that this standard has been fully satisfied, particularly given the age of the underlying data.

Additional environmental concerns arise from the presence of regulated lands and ecological features on and adjacent to the property. Portions of the site fall under Grand River Conservation Authority regulation due to wetlands and associated features, which introduces further complexity and risk. The study also identifies species at risk within the area, including Butternut trees, which are protected under provincial legislation. These factors alone typically warrant a high level of scrutiny and, in many cases, additional study or monitoring requirements before development proceeds.

Finally, it is worth noting that portions of the ecological assessment were conducted with limited access, meaning that some areas were evaluated from their edges rather than through full field investigation. This raises questions about whether the environmental data is fully comprehensive. When decisions of this scale are being made, it is critical that they are based on complete and accurate information, particularly when natural heritage systems are involved.

Together, these concerns point to a broader issue of whether this development aligns with the Township's own planning principles. The Township of Wilmot and Region of Waterloo both emphasize responsible, phased growth that is supported by infrastructure, protects environmental systems, and maintains compatibility with existing communities. At present, there are clear gaps and uncertainties in each of these areas. Before moving forward, I seek that the council should require updated environmental studies, a comprehensive infrastructure capacity review, a

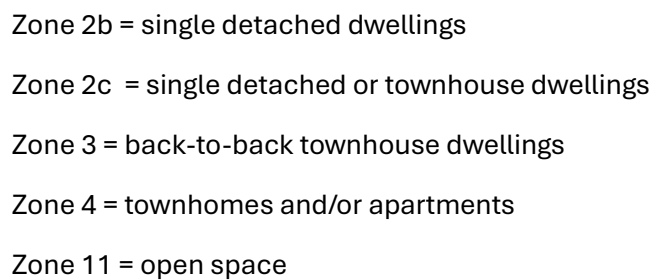
reassessment of traffic impacts, and a clear plan for managing construction and minimizing disruption. Ensuring that these steps are taken would help align the proposed development with the Township's stated goals and ensure that growth occurs in a way that is both sustainable and responsible for the community.

Thank you for your time and consideration.

Sincerely,

Alex Sooley

■ Kropf Drive, Baden, ON.



Zone 2c = single detached or townhouse dwellings

Zone 4 = townhomes and/or apartments

Zone 11 = open space