Planning Justification Brief

2342 Snyder's Road East

Bogdan Pelczar

Township of Wilmot

Zoning By-law Amendment
Consent to Sever

May 2026

GSP group

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Contents

1. Introduction 1
   - 1.0 Overview 1
   - 1.1 Purpose and Scope 1
   - 1.2 Report Context and Structure 1

2. Site Overview and Context 3
   - 2.1 Site Location and Description 3
   - 2.2 Surrounding Uses and Context 3

3. Proposed Development 5

4. Summary of Supporting Studies 7
   - 4.1 Hydrogeological Study 7

5. Planning Policy Overview 9
   - 5.1 Ontario Planning Act 9
   - 5.2 Provincial Planning Statement 12
   - 5.3 Region of Waterloo Official Plan 14
   - 5.4 Township of Wilmot Official Plan 19
   - 5.5 Township of Wilmot Zoning By-law 83-38 23
     - 5.5.1 Minimum Lot Area 23
     - 5.5.2 Minimum Lot Frontage 24

6. Proposed Applications 26
   - 6.1 Consent to Sever Application 26
   - 6.2 Zoning By-law Amendment Application 26

7. Public Consultation 27

8. Conclusion 28

Appendix “A” – Draft Zoning By-law Amendment 30

Appendix “B” – Draft Zoning By-law Amendment Schedule 31

List of Figures

Figure 1 - Site Location 4
Figure 2 - Severance Sketch 6
Figure 3 - Region of Waterloo Official Plan - Regional Structure 17
Figure 4 - Region of Waterloo Official Plan - The Countryside 18
Figure 5 - Township of Wilmot Official Plan 22
Figure 6 - Township of Wilmot Zoning By-law 83-38 25

List of Tables

Table 1 - Z1 (Agricultural) Zoning Requirements 23

1. Introduction

1.0 Overview

GSP Group has been retained by Bogdan Pelczar (the "Owner") to prepare this Planning Justification Brief ("PJR" or "Report") in support of a Zoning By-law Amendment Application and Consent Application (Severance) for the property municipally addressed as 2342 Snyder's Road East in the Township of Wilmot (the "Site").

The Site is located on the east side of the Township of Wilmot on the north side of Snyder's Road East, generally located west of the City of Kitchener boundary. The Site is currently occupied by an existing single-detached dwelling and attached garage as well as an accessory shed. The details of the Site and surrounding site context are contained in Section 2.0 of this Report.

The purpose of the subject applications is to facilitate a severance of the property into two parcels, the Retained Lot, and the Severed Lot (the "Proposed Development"). To facilitate the severance of the property, a Zoning By-law Amendment is required to permit a reduced minimum lot area and lot frontage within the "Zone 1 (Agricultural)" zone. The details of the Proposed Development are contained in Section 3.0 of this Report.

1.1 Purpose and Scope

The Site is currently designated as "Rural Areas" in the Township of Wilmot Official Plan. The Site is currently zoned "Zone 1 (Agricultural)" in the Township of Wilmot Zoning By-law 83-38. The purpose of the proposed Zoning By-law Amendment is to rezone the Site from "Zone 1 (Agricultural)" to "Zone 1 (Agricultural), Exception XX" with the site-specific provisions pertaining to the reduced minimum lot area and minimum lot frontage requirements.

The details of the proposed Zoning By-law Amendment are contained in Section 6.2 of this Report.

1.2 Report Context and Structure

This Report has been prepared to provide planning justification for the proposed Consent (Severance) and Zoning By-law Amendment applications which are required to facilitate the Proposed Development. The objectives of this Report are as follows:

- To provide an overview of the Site, including site descriptions and a summary of surrounding uses and community context;
- To provide a brief summary of the Proposed Development;
- To provide a brief summary of all supporting technical reports and studies;
- To provide a summary of the applicable Provincial, Region of Waterloo and Township of Wilmot policy and regulatory framework along with planning justification and commentary in support of the Proposed Development; and,
- To provide an overview of the proposed applications for Consent (Severance) and Zoning By-law Amendment.

2. Site Overview and Context

2.1 Site Location and Description

The Site is municipally known as 2342 Snyder's Road East in the Township of Wilmot and is legally known as Concession North of Snyders Road Part Lot 1. The Site has approximately 54.9 metres of frontage along Snyder's Road East, with a depth of approximately 154.0 metres. The Site has an overall area of 8,081.40 square metres (0.81 hectares) (**Figure 1**).

The Site is currently occupied by an existing single-detached dwelling and attached garage as well as an accessory shed. To facilitate the Proposed Development, all existing buildings and structures on the Site will be demolished.

From the rear of the existing single-detached dwelling, there is a slope on the Site from south to north of approximately 4.0 metres, and from the front of the single-detached dwelling, there is a slope from north to south of approximately 0.5 metres toward Snyder's Road East.

2.2 Surrounding Uses and Context

The immediate and surrounding land uses are as follows:

NORTH: To the north of the Site are agricultural uses. Further north of the Site is a Goderich-Exeter Railway Line and an aggregate pit that has access from Snyder's Road East.

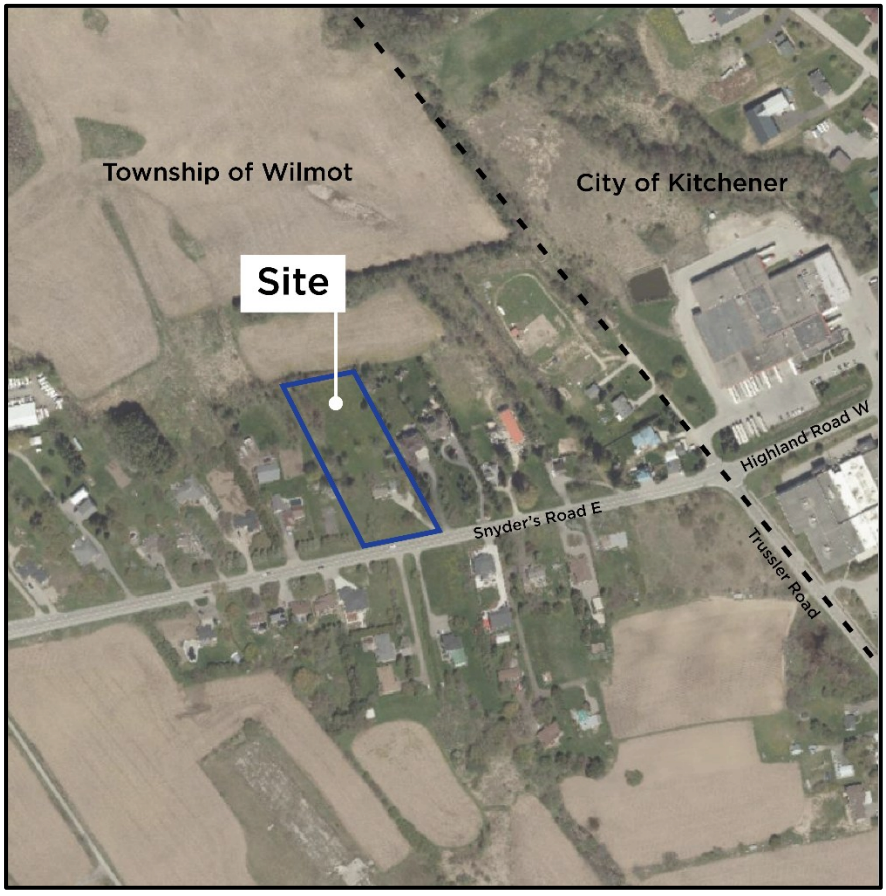
EAST: To the east of the Site are residential uses fronting Snyder's Road East. Further east of the Site is the City of Kitchener, including limited employment uses, commercial uses, and residential uses fronting Highland Road West, Trussler Road, Glasgow Street, and various local roads. Further east, in the City of Kitchener, is the Highland Marketplace, which contains a wide variety of commercial and retail uses, including a Shoppers Drug Mart, dental office, cannabis store, nail salon, hair salons, liquor store, pet store, Sobeys, Royal Bank of Canada, various restaurants and other retail and commercial uses. A variety of institutional uses, including Taber Kitchener (church), CTots Childhood Education Centre, Kitchener Baptist Church, and First Romanian Baptist Church.

SOUTH: To the south of the Site are residential uses fronting Snyder's Road East. Further south of the Site are agricultural uses.

WEST: To the west of the Site are residential uses fronting Snyder's Road East. Further west of the Site are residential and agricultural uses.

The Site is located in an existing cluster of rural residential lots. The Site is close to a broad range of existing commercial, retail, and personal service uses to the east. The Site is proximate to a range of existing Grand River Transit ("GRT") services, including GRT Route 77 (Wilmot) along Snyder's Road East and Highland Road West to the east of the Site and GRT Route 204 (iXpress Highland-Victoria) along Ira Needles Boulevard and Highland Road West to the east of the Site. These routes provide connection to additional GRT routes, as well as an existing GRT Connecting Terminal (Boardwalk Station).

Figure 1 - Site Location

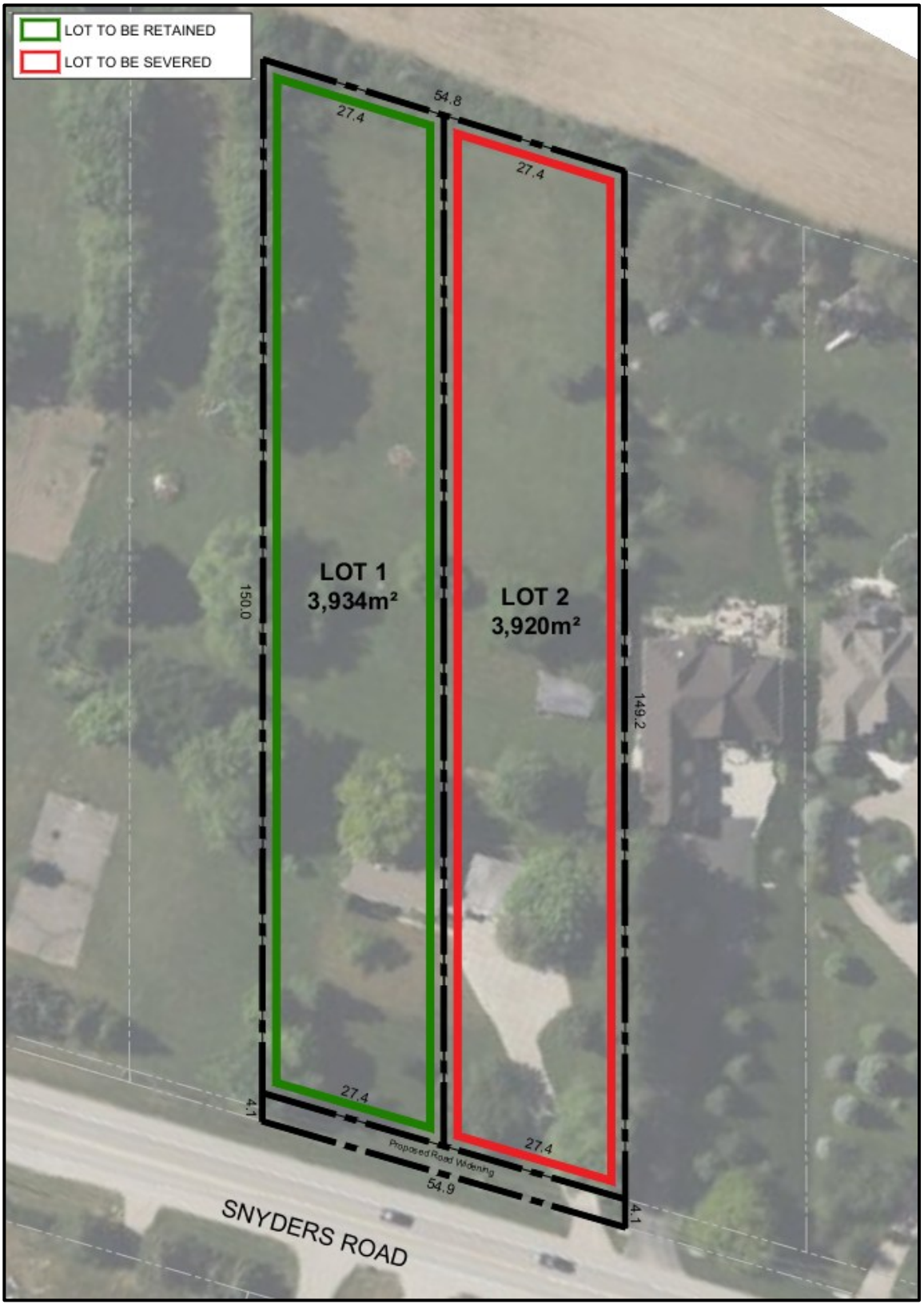


Source: Waterloo GIS Locator (2024)

3. Proposed Development

The purpose of the proposed Consent (Severance) and Zoning By-law Amendment applications is to facilitate a severance of the Site into two parcels, the Retained Lot and the Severed Lot (**Figure 2**). The Retained Lot (Lot 1) will have a frontage of 27.4 metres along Snyder's Road East, with an area of 3,932.80 square metres (0.39 hectares) and a depth of 149.97 metres. The Severed Lot (Lot 2) will have a frontage of 27.4 metres along Snyder's Road East, with an area of 3,920.51 square metres (0.39 hectares) and a depth of 149.70 metres. To facilitate the severance of the Site, the existing single-detached dwelling and attached garage, as well as the accessory shed, is proposed to be demolished. It is anticipated that a 4.07-metre road widening is required along Snyder's Road East.

Figure 2 - Severance Sketch



4. Summary of Supporting Studies

4.1 Hydrogeological Study

A Hydrogeological Study has been prepared in support of the Proposed Development by Chung & Vander Doelen Engineering Ltd. ("CVD"), dated February 2, 2026. Additionally, a Technical Memorandum, dated April 17, 2026, has been prepared to complement the Hydrogeological Study and has been prepared in response to comments received by BluMetric on March 18, 2026. The Hydrogeological Study and Technical Memorandum should be read in full alongside this Report.

The Site is predominantly underlain by low-permeability soils (percolation rate >50 min/cm), clayey silt and till deposits. These soils are present directly at ground surface at the northern end of the property and beneath a generally thin layer of low-permeability fine granular deposits at the southern end of the property.

Shallow groundwater flow direction mimics the local topography of the Site, with groundwater travelling in a north-northwesterly direction towards the adjacent unoccupied agricultural field.

All private wells within 500 m of the Site are located to the east, west, and south of the property. These private wells are predominantly situated within a deep, hydraulically isolated sand and gravel confined aquifer (overlain by at least 10 m of aquitard). While several dug wells were identified, they are not located down-gradient of the subject Site.

The Site is located within the WHPA-C zone of municipal wells K91 to K94, located 2.5 km southeast of the Site, with a relatively low vulnerability of 4. Although classified as a Tier 2 Significant Groundwater Recharge Area, the presence of low-permeability underlying soils, the and the northward groundwater flow direction indicate that significant recharge is unlikely to occur within the property itself.

Due to the lack of down-gradient shallow groundwater users and the presence of a greater than 10-metre thick low-permeability aquitard providing reasonable hydraulic isolation of the shallow water table from the underlying confined sand and gravel aquifer, the resultant nitrate loading of 16 mg/L to the shallow groundwater table from the proposed severance and development is not anticipated to adversely impact nearby water users from a quality perspective. A confined sand & gravel aquifer, located at 38± to 43± m depth, is the primary source of potable water to the Site and adjacent properties. A review of well records suggests that this aquifer is at least 14± to 18± m thick, with recommended pumping rates varying from 35± to 60± L/min. As such, the aquifer should have sufficient capacity and provide sufficient yield to facilitate the addition of another private drinking water well without adverse impact to nearby water users from a quantity perspective.

The on-Site potable well was found to be a drilled well with a 6” steel well casing. The total measured depth is 203’/62m from top of casing, being installed into the underlying Waterloo Moraine aquifer, and is comparable to other drilled wells in the area used for domestic water supply purposes. The well has a submersible pump system installed with an intake depth of 160’/48.7m below top of casing (BTOC). The static water level was measured at 139’/42.4m BTOC. Based on this finding, the nitrate concentration of 0.142 mg/L measured from a water sample of collected from a tap in the on-Site house (as shown in Section 5.2 of the referenced CVD hydrogeological report) represents the background nitrate levels from the deep sand and gravel aquifer and is not representative of nitrate levels in the shallow water table. The nitrate concentrations from water samples collected at monitoring wells BH1 and BH6, 0.221 mg/L and 1.64 mg/L, respectively, are therefore the values representative of background nitrate in the shallow water table aquifer. Nonetheless, this finding shows that the deep aquifer supplying the on-Site drilled well has sufficient hydraulic isolation from overlying fine-grained soils (aquitard) that surficial nutrient applications on farmland and area septic systems have not adversely impacted water quality.

The well at 2326 Snyders Road, denoted by CVD as N.B., has been confirmed to be a shallow well that is constructed using 43.5”/ 1.1m outside diameter concrete tile well casing, with a total depth of 98”/2.49m from top of casing. The top of casing elevation was measured at 378.30 mASL by CVD using a Trimble Network RTK Global Navigation Satellite System (GNSS) Receiver. Groundwater was measured at 0.94 metres below top of casing (mBTOC) on April 8, 2026. Utilizing measurements collected on April 8th, 2026, from the shallow dug well N.B. and monitoring wells BH1, BH3, and BH6, the shallow groundwater flow path and contours were reinterpreted (see appended Figure 1). The findings are largely consistent with CVD’s initial findings from the reference hydrogeological report, with shallow groundwater flow being towards the north-northwest.

CVD did not observe any existing water courses that cross through the farm field adjacent to the north of the Site. Ponded water was observed in a few low-lying areas but no direct connection to the GRCA mapped tributary / headwaters of Alder Creek was observed. It can be concluded that current GRCA mapping is accurate, and that no watercourse currently exists on the north adjacent farm field.

It is understood that the current Site is zoned for a single detached dwelling with up to two additional dwelling units. The Proposed Development will result in the construction of a single detached residential dwelling on each of the severed and retained lots. The new potable water well will be drilled into the underlying sand and gravel aquifer and will only support a single domestic home and not a multi-unit residential building. No detrimental impacts to groundwater quantity to nearby groundwater users are expected and no additional work on the groundwater supply is warranted at this time.

The clearance letter from BluMetric in support of CVD’s Hydrogeological Study was received by GSP Group on May 13, 2026.

5. Planning Policy Overview

5.1 Ontario Planning Act

The *Planning Act,* R.S.O. 1990, c. P.13 ("Planning Act"), establishes the framework for land use planning in Ontario. The Planning Act provides for the integration of provincial matters in planning decisions; details a planning process that is fair, accessible, timely and efficient; encourages cooperation and coordination amongst various interest groups; and recognizes the decision-making authority and accountability of municipal councils in the planning process.

The Planning Act requires that all planning decisions shall have regard to matters of Provincial Interests as identified in Section 2. The following table provides an analysis of the Proposed Development in response to the prescribed Provincial interest of Section 2 of the Planning Act.

(a)	The protection of ecological systems, including natural areas, features, and functions;	*The Site does not contain any natural areas, features, and/or functions. The Proposed Development will not impact any ecological systems located on the Site or adjacent to the Site.*
(b)	The protection of the agricultural resources of the Province;	*The Site is located within an existing cluster of rural residential lots and is designated Rural Areas in the Township of Wilmot Official Plan, which permits residential dwellings. The Site in its existing configuration has not been used for agricultural purposes. The Proposed Development will not negatively impact the agricultural resources of the Province.*
(c)	The conservation and management of natural resources and the mineral resource base;	*The Site is located within an existing cluster of rural residential lots and is designated Rural Areas in the Township of Wilmot Official Plan, which permits residential dwellings. The Proposed Development will not negatively impact the conservation and management of natural resources and the mineral resource base.*
(d)	The conservation of features of significant architectural, cultural, historical, archaeological, or scientific interest;	*Not applicable.*
(e)	The supply, efficient use and conservation of energy and water;	*There is an existing well and septic system on the Site which are proposed to be decommissioned and removed to accommodate the Proposed Development. Both the Retained Lot and Severed Lot will utilize*

		separate private services. The provision of other utilities will be coordinated after the consideration of the proposed Consent (Severance) and Zoning By-law Amendment applications.
(f)	The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	*The Proposed Development will utilize existing communication, transportation, and waste management services. Both the Retained Lot and Severed Lot will utilize separate private services. The provision of utilities will be coordinated after the consideration of the proposed Consent (Severance) and Zoning By-law Amendment Applications.*
(g)	The minimization of waste;	*The Proposed Development will be required to adhere to the Resource Recovery and Circular Economy Act, S.O. 2016, Chapter 12, Schedule 1 and the requirements contained therein with respect to waste diversion and management.*
(h)	The orderly development of safe and healthy communities;	*The Site is located within an existing cluster of rural residential lots and is designated Rural Areas, which permits the construction of single-detached dwellings. The Proposed Development represents a well-designed, logical, and orderly lotting pattern which is consistent with surrounding uses. The Proposed Development has been designed to include separate, safe access to and from Retained Lot and the Severed Lot from Snyder's Road East. The Proposed Development will contribute to the orderly development of safe and healthy communities.*
(h.1)	The accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	*The Proposed Development will be compliant with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11.*
(i)	The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	*The Site is proximate to a broad range of existing commercial, community and institutional uses, and is located near a number of existing GRT routes. The Proposed Development will utilize existing educational, health, social, cultural, and recreational facilities.*
(j)	The adequate provision of a full range of housing, including affordable housing;	*The Proposed Development includes the creation of two lots, the Retained Lot and the Severed Lot. While there are currently no plans to develop the Retained Lot and the Severed Lot, these parcels are capable of supporting residential development. While the Proposed Development includes the demolition of the existing single-detached dwelling on the Site, the severance can support a net increase in residential dwellings on the overall Site from one to two.*
(k)	The adequate provision of employment opportunities;	*The Proposed Development will not generate any employment opportunities, outside of those short-term*

		positions associated with the construction of any future dwellings on the Site.
(l)	The protection of the financial and economic well-being of the Province and its municipalities;	*The Proposed Development does not require any financial commitment from the Region of Waterloo or the Township of Wilmot for the provision of infrastructure. It will be the responsibility of the Owner for the costs associated with the provision of private services and any necessary infrastructure required to accommodate the Proposed Development.*
(m)	The co-ordination of planning activities of public bodies;	*The proposed Consent (Severance) and Zoning By-law Amendment applications will be circulated to all commenting agencies, departments, and interest holders by the Township for review and comments prior to the Committee of Adjustment and Council's respective decisions regarding the Proposed Development.*
(n)	The resolution of planning conflicts involving public and private interests;	*Resolution of planning conflicts that may arise through consideration of the Proposed Development will be addressed as part of the circulation and review process, which will include formal and informal public meetings for the Zoning By-law Amendment, as required by the Planning Act.*
(o)	The protection of public health and safety	*The Proposed Development will not impact public health and safety. The Proposed Development is logically designed to be compatible and consistent with the surrounding neighbourhood.*
(p)	The appropriate location of growth and development;	*The Site is located within an existing cluster of rural residential lots and is designated Rural Areas in the Township of Wilmot Official Plan, which permits residential development. The Proposed Development will result in the creation of two lots, presenting the opportunity to construct two new dwellings, one per each respective lot, representing a subtle increase in residential dwellings in the surrounding neighbourhood. The Site has not traditionally been used for agricultural purposes and will have no impact on the viability of adjacent agricultural operations. As such, the Site is a suitable location for subtle growth and development.*
(q)	The promotion of development that is designed to be sustainable, to support public transit and be oriented to pedestrians;	*The Site is in proximity to a number of existing GRT routes. These transit routes connect to the nearby Boardwalk Station, providing a connection to GRT's broader network. The broader GRT network provides regional transit connection opportunities, including GO Transit bus and train service as well as VIA Rail service.*
(r)	The promotion of built-form that, (i) is well-designed,	*The Proposed Development will create a built form that is consistent with the surrounding rural residential cluster and is therefore well-designed and further*

	(ii) encouraged a sense of place, and, iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant	*contributes to the existing sense of place. The Proposed Development does not propose any public spaces.*
(s)	The mitigation of greenhouse gas emissions and adaptation to climate change.	*The Proposed Development will have minimal impact related to greenhouse gas emissions and climate change. The Proposed Development has been designed to ensure matter such as stormwater are adequately controlled on the Site.*

Based on the above-noted commentary, it is our opinion that the Proposed Development has regard to the applicable matters of Provincial interest as identified in the Planning Act.

5.2 Provincial Planning Statement

The Provincial Planning Statement, 2024 ("PPS") provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents. The PPS is issued under Section 3 of the Planning Act and came into effect on October 20, 2024. The following provides a summary of the key PPS policy considerations for the Site and provides justification for the Proposed Development as it relates to these policies.

Policy 2.1.6 a) of the PPS states that planning authorities should support the achievement of complete communities by: accommodating an appropriate range and mix of land uses, housing options […] to meet long-term needs. Policy 2.2.1 b) 1. & 2. of the PPS states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: permitting and facilitating: all housing options required to meet the social, health, economic, and well-being requirements of current and future residents (1.) and, all types of residential intensification […], development and introduction of new housing within previously developed areas, and redevelopment, which results in a net increase in residential units.

<u>Response:</u> The Proposed Development will result in the creation of two rural residential lots which can accommodate residential development to support the meeting of long-term needs and the projected needs of current and future residents. While no residential development is proposed at this time, the Proposed Development provides the opportunity to create a net increase in residential units, from one dwelling to two dwellings.

Policy 2.6.1 c) of the PPS states that on rural lands located in municipalities, permitted uses are: residential development, including lot creation, where site conditions are suitable for the provision of appropriate sewage and water services. Policy 2.6.2 states that development that can be sustained by rural service levels should be promoted. Policy 2.6.3 states that development shall be appropriate to the infrastructure, which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure. Policy 2.6.5 states that new land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.

Response: The Site is suitable for residential development, and both the Retained Lot and Severed Lot can accommodate individual private services, limiting the need for the expansion of servicing infrastructure. The Proposed Development can be sustained by existing rural service levels. The Site is located within an existing cluster of rural residential lots, many of which are located closer to any existing livestock facilities than the Site. As such, there are limited existing incompatibilities, and the Proposed Development complies with the minimum distance separation formulae.

Policy 3.6.1 b) of the PPS states that planning for sewage and water services shall: ensure that these services can be provided in a manner that: can be sustained by the water resources upon which such services rely (1.); protects human health and safety, and the natural environment, including the quality and quantity of water. Policy 3.6.4 states that where municipal sewage services and municipal water services are not available, planned, or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.

Response: Both the Retained Lot and the Severed Lot will utilize individual on-site water services and individual on-site tertiary sewage services. Please read the Hydrogeological Study included with this submission.

Policy 3.6.8 of the PPS states that planning for stormwater management shall: minimize, or where possible, prevent or reduce increased in stormwater volumes and contaminant loads (b); and, mitigate risks to human health, safety, and the environment (d).

Response: A Grading Plan and Drainage Plan will be prepared in support of the Proposed Development. The Site will be designed to minimize, prevent, and/or reduce increased stormwater volumes and contaminant loads, where they may arise. The Proposed Development is similar to adjacent development and no risks to human health, safety, and/or the environment are anticipated. A condition of consent approval is anticipated that will specially require the approval of a grading and drainage plan.

In summary, the Proposed Development is consistent with the Provincial Planning Statement as it supports efficient rural residential growth. The creation of two rural

residential lots (one new lot, one retained lot) can be accommodated with individual on-site water and sewage services, avoiding the need for expanded municipal servicing. A Grading and Drainage Plan has been prepared for the Proposed Development, and the Site will efficiently manage stormwater without impact to human health, safety, and/or the environment. The Site is compatible with surrounding rural residential uses, complies with the minimum distance separation requirements, and contributes to meeting long-term housing needs by increasing the potential number of dwellings from one to two.

5.3 Region of Waterloo Official Plan

The Region of Waterloo Regional Official Plan ("ROP") was approved by the Ministry of Municipal Affairs and Housing, with modifications, on December 22, 2010, and approved with amendments by Oral Decision of the Ontario Municipal Board on June 18, 2015. Regional Official Plan Amendment 6 ("ROPA 6"), which established the planning framework for accommodating forecasted population and employment growth within the Region to 2051, was approved by the Minister of Municipal Affairs and Housing on April 11, 2023. ROPA 6 established a new policy framework with the implementation of Chapter 2 – Where and How to Grow, as well as new housing policies in Section 3.A, among other policy matters. The following is a review of the Proposed Development with respect to the relevant policies of the ROP.

Note the More Homes Built Faster Act, 2022, (Bill 23) amended the Planning Act by transferring planning responsibilities from the Region of Waterloo (as an upper-tier municipality) to the Township of Wilmot (as a local municipality). As a result, the Region no longer has an Official Plan (ROP) as it is now deemed an Official Plan for the Township of Wilmot. The Township of Wilmot is now responsible for implementation of the ROP as it applies to development and land use policy in the Township until the ROP is repealed through a future Area Municipal planning exercise.

The Site is designated as "Protected Countryside" on Map 1 – Regional Structure (**Figure 3**) and is further designated "Rural Areas" with a Protected Countryside overlay on Map 7 – The Countryside (**Figure 4**) in the ROP.

Policy 6.B.2 of the ROP states that land uses within the Protected Countryside will be regulated in accordance with the underlying policies of the Rural Areas designation as shown in this Plan. Policy 6.B.6 states that nothing in this Plan shall prevent the owner of a legal lot of record located within the Protected Countryside designation from obtaining a building permit to construct or enlarge a house, accessory building or farm structure, provided it is in conformity with all other Regional, area municipal and Grand River Conservation Authority policies and regulations. Policy 6.C.1 of the ROP states that new

land uses, including the creation of separate lots, will comply with the minimum distance separation formulae.

Response: The Site is designated Rural Areas in the ROP. The Site is located within an existing cluster of rural residential lots, many of which are located closer to any existing livestock facilities than the Site. As such, there are limited existing incompatibilities, and the Proposed Development complies with the minimum distance separation formulae.

Policy 6.E.1 (b) of the ROP states that development applications to create a new residential lot within the Rural Areas designation, or which would otherwise result in the creation of a new residential lot, will not be permitted except in the following circumstances: within the Rural Areas designation, to create new infill lots for residential purposes within an existing grouping of rural residential lots that has not been designated in an area municipal official plan as a Rural Settlement Area, subject to policy 6.E.10. Policy 6.E.10 states that within the Rural Areas designation, area municipalities may permit the creation of new lots for residential infill purposes within an existing grouping of residential lots that has not been designated as a Rural Settlement Area within the area municipal official plan, provided that:

(a)	The existing grouping of lots accommodating the proposed infilling lot(s) presently consists of a grouping of four or more non-farm lots, with each such unit or lot separated from each other by no more than 100 metres on the same side of an open public road;	*The Site is located along the eastern portion of Snyder's Road East where there is an existing grouping of four or more non-farm lots which are separated from each other by no more than 100 metres on the north side of Snyder's Road East.*
(b)	The measurement of the 100-metre separation distance is determined in accordance with the rural residential infilling formulae;	
(c)	The new lot has a maximum area of one hectare, except where natural features or existing lot patterns justify inclusion of additional lands;	*The Retained Lot and the Severed Lot have a proposed area of approximately 0.40 hectares, respectively.*
(d)	The new lot is not located within a Source Water Protection Area where individual wastewater treatment systems are identified as a prohibited use in accordance with the policies in Chapter 8; and	*The Site is located in a WPSA 8 designation. Within the WPSA 8 designation, Category 'A' uses are not permitted. Individual wastewater treatment systems are not classified as a Category 'A' use.*

(e)	The new lot can be adequately serviced by private wells and individual wastewater treatment systems.	*The Retained Lot and Severed Lot are of sufficient size to be adequately serviced by private wells and individual tertiary wastewater treatment systems. Please read the Hydrogeological Study included with this submission.*

Policy 5.B.8 of the ROP states that development applications proposing alternative individual wastewater treatment systems will only be permitted where the proposed lot size would accommodate a conventional individual wastewater treatment system.

Response: The Proposed Development will utilize a tertiary wastewater treatment system on both the Retained Lot and the Severed Lot. According to the Hydrogeological Study prepared by CVD, groundwater travels in a north-northwesterly direction toward the adjacent unoccupied agricultural field, and adjacent private wells are hydraulically isolated. BluMetric confirmed acceptance of the hydrogeological study on May 13, 2026. Policy 5.B.8 of the ROP will be addressed through an Official Plan Amendment as a condition of the consent application, as indicated by Cameron Miller on February 6, 2026.

In summary, the Proposed Development conforms with the ROP by supporting appropriate rural residential growth within the Rural Areas designation while maintaining compatibility with surrounding land uses. The Proposed Development complies with the minimum distance separation formulae. The Retained and Severed Lots are each approximately 0.40 hectares in size and can be adequately serviced by private wells and individual wastewater treatment systems, which are permitted within the WPSA-8 designation. The Site is located within an existing cluster of rural residential lots along Snyder's Road East, meeting the ROP's criteria for new lot creation in the Rural Areas designation.

Figure 3 - Region of Waterloo Official Plan - Regional Structure

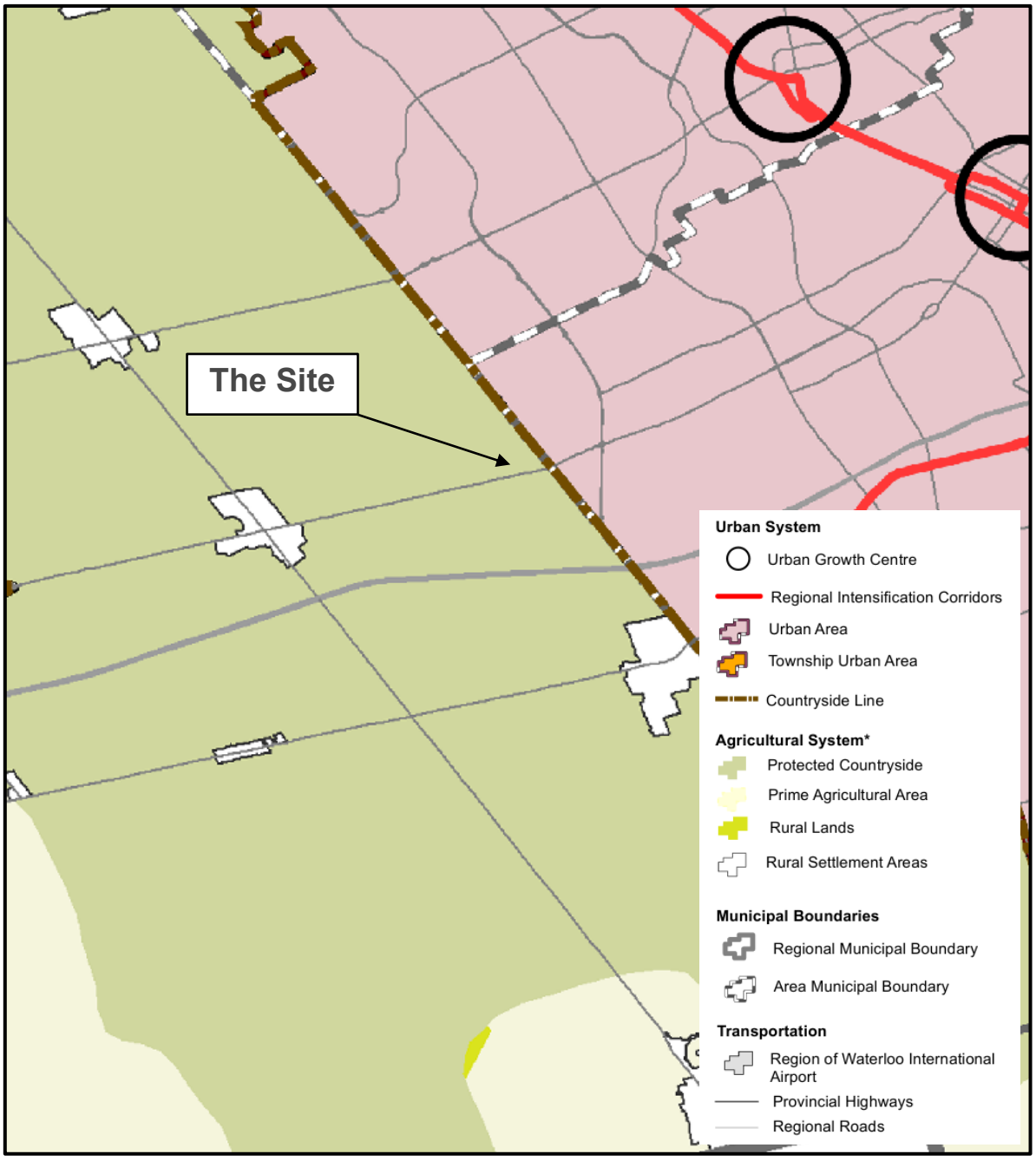
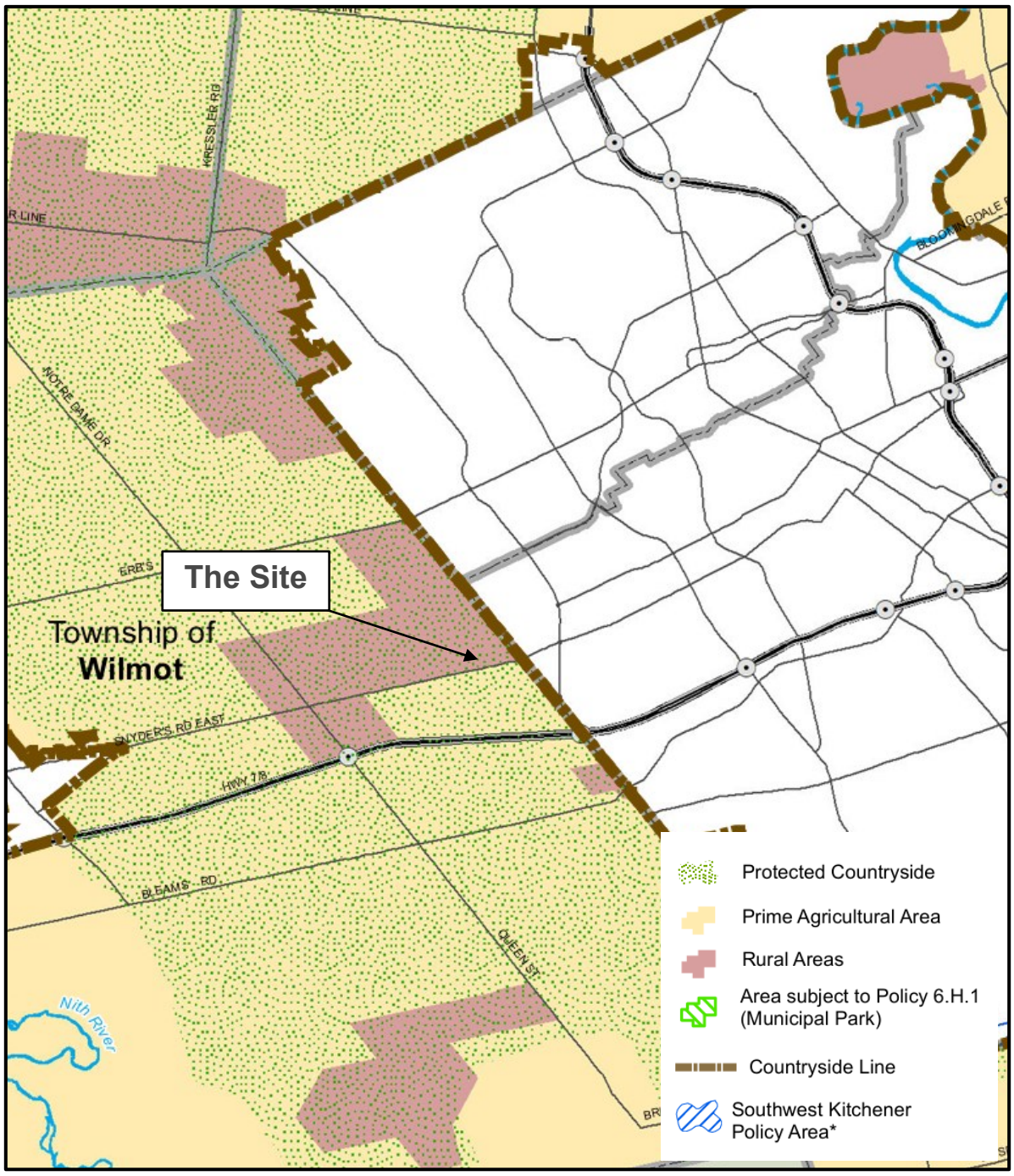


Figure 4 - Region of Waterloo Official Plan - The Countryside



5.4 Township of Wilmot Official Plan

The Township of Wilmot Official Plan ("Official Plan") was adopted by the Council of the Township of Wilmot on July 21, 2003, by By-law 2003-44. On July 7, 2004, the Official Plan was approved with modifications by the Regional Municipality of Waterloo in accordance with Section 17(34) of the Planning Act, R.S.O. 1990, Chapter p.13, as amended and came into effect on August 5, 2004. The Official Plan identifies the Township's vision for growth and change within the community and sets out principles, objectives and policies designed to direct the form, extent, nature, and rate of growth and change within the Township to 2031.

The following provides a summary of the key policies of the Official Plan that apply to the Proposed Development, as well as planning commentary and justification in response to those applicable policies. The Site is currently designated "Rural Areas" in the Official Plan (**Figure 5**).

Policy 3.2.9 of the Official Plan states that development applications to create a new rural residential lot(s) within the Rural Areas designations, or which would otherwise result in the creation of a new rural residential lot(s), will not be permitted except in accordance with policies 3.2.11 and 3.2.12. *Policies 3.2.11 and 3.2.12 are not applicable to the Proposed Development. See response to Policy 3.2.10 below.*

Policy 3.2.10 of the Official Plan states that within the Rural Areas designation, the Township may permit the creation of one or more new rural residential lots for the purposes of infilling within an existing grouping of rural residential lots that have not been designated as a Rural Settlement Area by this Plan, provided that:

a)	The existing grouping of lots accommodating the proposed infilling lot(s) presently consists of a grouping of four or more rural residential lots, with each such lot separated from each other by no more than 100 metres on the same side of an open public road;	*The Site is located along the eastern portion of Snyder's Road East where there is an existing grouping of four or more non-farm lots which are separated from each other by no more than 100 metres on the north side of Snyder's Road East.*
b)	The measurement of the 100-metre separation distance is determined in	

	accordance with the rural residential infilling formulae;	
c)	The new lot has a maximum area of one hectare, except where natural features or existing lot patterns justify inclusion of additional lands;	*The Retained Lot and the Severed Lot have a proposed area of 0.39 hectares, respectively.*
d)	The new lot is not located within a Source Water Protection Area where individual wastewater treatment systems are identified as a prohibited use in accordance with the policies of Chapter 8; and	*The Site is located in a WPSA 8 designation. Within the WPSA 8 designation, Category 'A' uses are not permitted. Individual wastewater treatment systems are not classified as a Category 'A' use.*
e)	The new lot can be appropriately serviced by private wells and individual wastewater treatment systems.	*The Retained Lot and Severed Lot are of sufficient size to be adequately serviced by private wells and individual tertiary wastewater treatment systems. Please read the hydrogeological study included with this submission.*

Policy 3.8.2 of the Official Plan states that land uses within the Protected Countryside will be regulated in accordance with the underlying policies of Rural Areas as designated in this Plan. Policy 3.8.6 states that nothing in this Plan shall prevent the owner of a legal lot of record located within the Protected Countryside designation from obtaining a building permit to construct or enlarge a house, accessory building or farm structure, provided it is in conformity with all other Township, Regional, and Grand River Conservation Authority requirements and regulations.

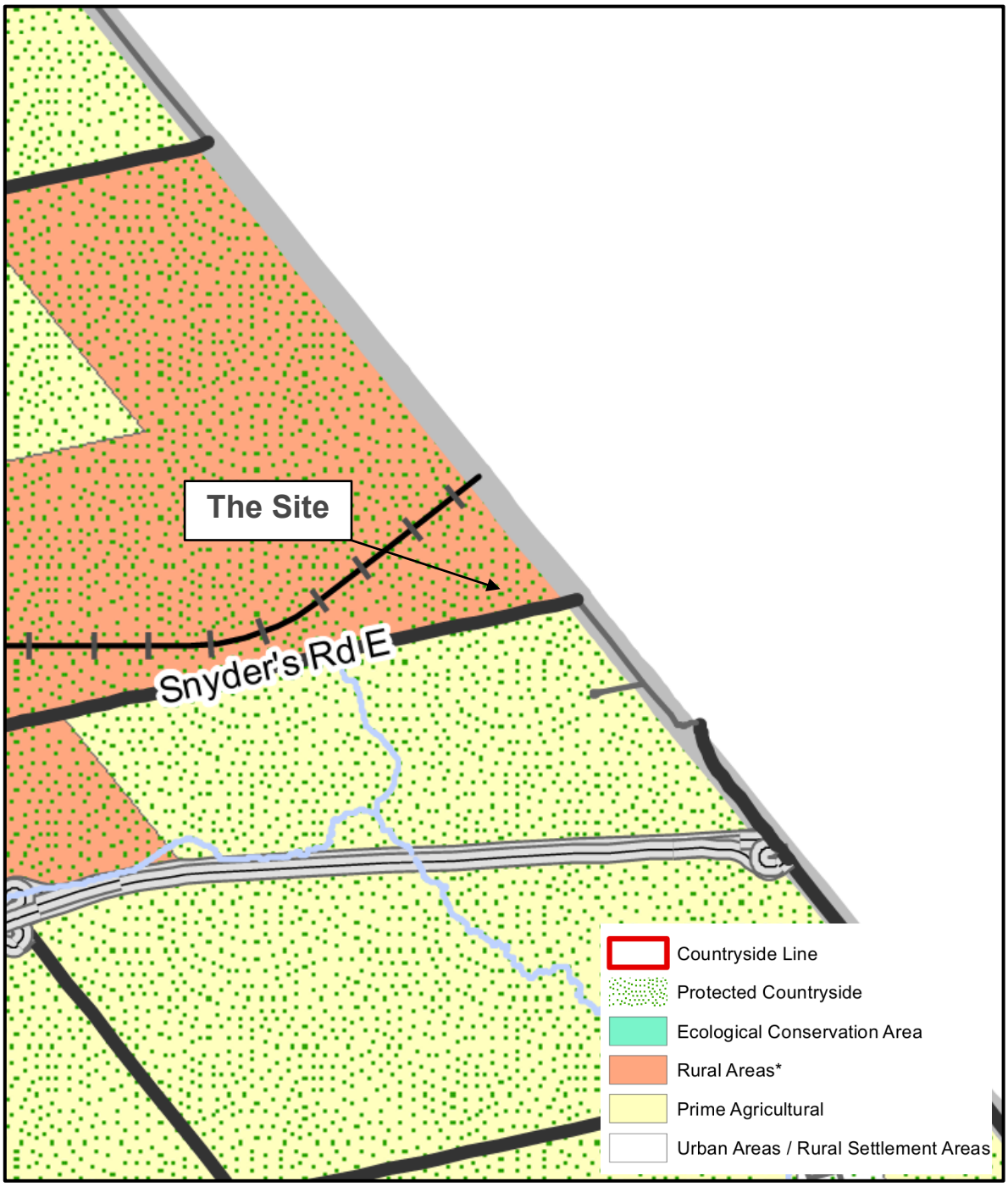
Policy 6.3.1 of the Official Plan states that new land uses, including the creation of separate lots, expansion of existing lots and the development of new or expanding livestock facilities will comply with the minimum distance separation formulae and the Nutrient Management Act.

Response: The Site is located within an existing cluster of rural residential lots, many of which are located closer to any existing livestock facilities than the Site. As such, there are

limited existing incompatibilities, and the Proposed Development complies with the minimum distance separation formulae.

In summary, the Proposed Development conforms with the Official Plan by supporting appropriate rural residential growth within an existing cluster of rural residential lots along Snyder's Road East. The Retained and Severed Lots are each approximately 0.40 hectares in size, providing sufficient area to accommodate private wells and individual wastewater treatment systems, which are permitted within the WPSA 8 designation. The Proposed Development is compatible with surrounding uses, complies with the minimum distance separation formulae, and avoids conflicts with adjacent agricultural operations.

Figure 5 - Township of Wilmot Official Plan



5.5 Township of Wilmot Zoning By-law 83-38

The Township of Wilmot Zoning By-law 83-38 ("Zoning By-law") is a by-law used to regulate and restrict: the use of land; the frontage, depth, and area of parcels of land; the use, location, erection, height, density, bulk, size, floor area, spacing and character of buildings and structures; the elevation of doors, windows and other openings of buildings and structures; the elevation of doors, windows and other openings of buildings and structures; the provision of maintenance of off-street loading and parking facilities; and, all other matters authorized by the Planning Act, R.S.O 1990, c. P.13 as amended and the regulations related thereto.

The Site is currently zoned "Z1 (Agricultural)" in the Zoning By-law (**Figure 6**). The Z1 Zone requires a minimum lot area of 40 hectares and a minimum lot frontage of 230 metres.

The Subject Application seeks to rezone the Site from "Z1 (Agricultural)" to "Z1 (Agricultural), Site-Specific Exception XX" with site-specific provisions to permit a minimum lot area of 0.39 hectares and a minimum lot frontage of 27.40 metres. The following is a summary of applicable zoning regulations from the Z1 Zone:

Table 1 - Z1 (Agricultural) Zoning Requirements

Regulation	Required	Proposed (Lot 1)	Conforms (Y/N)	Proposed (Lot 2)	Conforms (Y/N)
Min. Lot Area	40 ha	0.39 ha	N	0.39ha	N
Min. Lot Frontage	230 m	27.4 m	N	27.4 m	N

There are no buildings currently proposed and therefore additional requirements in the Zoning By-law related to yard setbacks have been omitted. The following provides planning commentary and justification for the site-specific exceptions associated with the Proposed Development that do not meet the requirements identified in **Table 1** of this Report above.

5.5.1 Minimum Lot Area

The proposed reduction in minimum lot area from 40.0 hectares to 0.39 hectares is appropriate given the existing context of the Site and the surrounding area. The Z1 (Agricultural) Zone is intended to support active farming operations and protect large

agricultural parcels. The Site is already an existing undersized parcel (~0.80 hectares) and has not historically been used for agricultural purposes. The Site is currently used as a rural residential lot within an established cluster of other rural residential lots, many of which being similar in area to the proposed Retained Lot and Severed Lot. The creation of two rural residential lots is compatible with the existing surrounding land use pattern and the reduction in minimum lot area from 40.0 hectares to 0.39 hectares will ensure consistency with surrounding residential uses.

5.5.2 Minimum Lot Frontage

The proposed reduction in minimum lot frontage from 230.0 metres to 27.4 metres is appropriate given the existing context of the Site and the surrounding area. The Z1 (Agricultural) Zone is intended to support active farming operations and protect large agricultural parcels. The Site is already an existing undersized parcel with a current frontage of approximately 54.8 metres and has not historically been used for agricultural purposes. The Site is currently used as a rural residential lot within an established cluster of other rural residential lots, many of which being similar in area, with similar lot frontages, to the proposed Retained Lot and Severed Lot. The creation of two rural residential lots is compatible with the existing surrounding land use pattern and the reduction in minimum lot frontage from 230 metres to 27.4 metres will ensure consistency with surrounding residential uses.

The Proposed Development is consistent with the character of surrounding development and maintains the intent of the Official Plan. The Proposed Development will not have any negative impact on adjacent agricultural operations.

The details of the proposed Zoning By-law Amendment are contained in Section 6.2 of this Report.

Figure 6 - Township of Wilmot Zoning By-law 83-38



6. Proposed Applications

6.1 Consent to Sever Application

The purpose of the Consent to Sever Application is to sever the Site into two parcels, the Retained Lot (Lot 1) and the Severed Lot (Lot 2). Lot 1 has a proposed area of 3,933 square metres (0.39 hectares), with a lot frontage of 27.4 metres and a depth of 149.97 metres (before road widening). Lot 2 has a proposed area of 3,921 square metres (0.39 hectares), with a lot frontage of 27.4 metres with a depth of 149.70 metres (before road widening).

It is noted that a 4.07-metre road widening is required along Snyder's Road East and will be conveyed to the Region of Waterloo.

6.2 Zoning By-law Amendment Application

The purpose of the Zoning By-law Amendment is to rezone the Site from "Z1 (Agricultural)" to "Z1 (Agricultural)" with the following Site-Specific Exceptions:

Notwithstanding any other provisions of this By-law, the lands described as Concession North of Snyders Road Part of Lot 1 and identified on the map forming Part 1 of Schedule 'A' and zoned Zone Z1 shall be subject to the following additional regulations:

(a) The minimum lot frontage shall be 27.4 metres;

(b) The minimum lot area shall be 0.39 hectares.

The details of the proposed Zoning By-law Amendment will be revised and refined through further discussions with and review of the application by the Township.

7. Public Consultation

Upon acceptance and circulation of the application package in support of the Proposed Development, the City requires the posting of Notice of Application sign(s) to inform surrounding property owners of the Proposed Development. GSP Group Inc. and the Owner commit to posting the required signage promptly with a clear, unobstructed view from the street and agree to maintain the sign throughout the duration of processing of the applications by the City.

The proposed Official Plan and Zoning By-law Amendment requires a Statutory Public Meeting in accordance with the Planning Act. GSP Group Inc. and the Owner will attend the public meeting as scheduled by the Township and give a formal presentation regarding the Proposed Development and associated applications, as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow-up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation process to the Township for their review and consideration prior to the preparation of a final staff report and recommendation on the proposed Official Plan and Zoning By-law Amendment.

8. Conclusion

GSP Group has been retained by Bogdan Pelczar to provide planning justification in support of the Proposed Development of the property at 2342 Snyder's Road East which includes the severance of the parcel into two 0.39-hectare rural residential lots.

The purpose of the proposed Zoning By-law Amendment is to rezone the Site from "Z1 (Agricultural)" to "Z1 (Agricultural)" with Site-Specific Exceptions pertaining to minimum lot area and minimum lot frontage.

This Planning Justification Report has undertaken a policy review and concludes that the proposed Official Plan and Zoning By-law Amendments are appropriate and represent good planning for the following reasons:

- The Proposed Development is consistent with the PPS as it supports appropriate rural residential growth within an established cluster of rural residential lots, can be serviced by individual on-site water and sewage systems, and effectively managed stormwater without negative impacts on human health, safety, or the environment. It is compatible with the surrounding rural residential uses, complies with the minimum distance separation formulae, and can contribute to providing opportunities to meet long-term housing needs.
- The Proposed Development conforms to the ROP as it supports appropriate rural residential growth, maintains compatibility with surrounding land uses, and complies with the minimum distance separation formulae. The Retained Lot and Severed Lot, each 0.39 hectares in size, can be adequately serviced by private wells and individual wastewater treatment systems. The Site is located within an existing cluster of rural residential along Snyder's Road East, satisfying the ROP's criteria for new lot creation in Rural Areas. Policy 5.B.8 of the ROP will be addressed as a condition of consent, as confirmed by Cameron Miller on February 6, 2026.
- The Proposed Development conforms to the Official Plan as it facilitates appropriate rural residential growth within an existing cluster of rural residential lots along Snyder's Road East while providing sufficient lot sizes of 0.39 hectares to accommodate private wells and individual wastewater treatment systems. The Proposed Development is compatible with surrounding uses, complies with the minimum distance separation formulae, and avoids conflicts with adjacent agricultural operations.

- Site-specific zoning exceptions, including for minimum lot area and minimum lot frontage maintain the intent of the Zoning By-law by delivering a high-quality built form that is consistent with existing adjacent undersized agricultural lots that are used for rural residential purposes.

In summary, the Proposed Development is compatible with surrounding land uses, aligns with applicable planning policies, and supports appropriate residential growth within the Rural Area designation, and represents good planning.

Prepared by:

GSP Group Inc.





Dylan Schnurr, BES
Planner / Urban Designer

Brandon Flewwelling, MCIP, RPP
Development Planning Manager

Appendix “A” – Draft Zoning By-law Amendment

THE CORPORATION OF THE TOWNSHIP OF WILMOT

BY-LAW NO. 2026-XX

BEING A BY-LAW TO FURTHER AMEND BY-LAW NO. 83-38 OF THE TOWNSHIP OF WILMOT BEING A ZONING BY-LAW FOR THE SAID TOWNSHIP OF WILMOT

WHEREAS The Corporation of the Township of Wilmot deems it desirable to further amend By-law No. 83-38, being a Zoning By-law for the Corporation of the Township of Wilmot, with respect to the lands identified on Schedule “A” in accordance with the provisions of this by-law.

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF WILMOT ENACTS AS FOLLOWS:

1. By changing the zoning on the affected land on Schedule “A” from “Agricultural (Z1)” to (Z1) Agricultural with special provision 22.3XX.
2. Notwithstanding any other provisions of this By-law, on the lands identified on Schedule “A”, the following regulations shall apply:
    i. minimum lot area: 0.39 hectares;
    ii. minimum lot frontage: 27.40 metres.
3. This By-law shall come into force and effect on the date of its final passing, subject to the provisions of the Planning Act, 1990 and amendments thereto.

Enacted this ___ day of _____, 2026

_____

MAYOR

_____

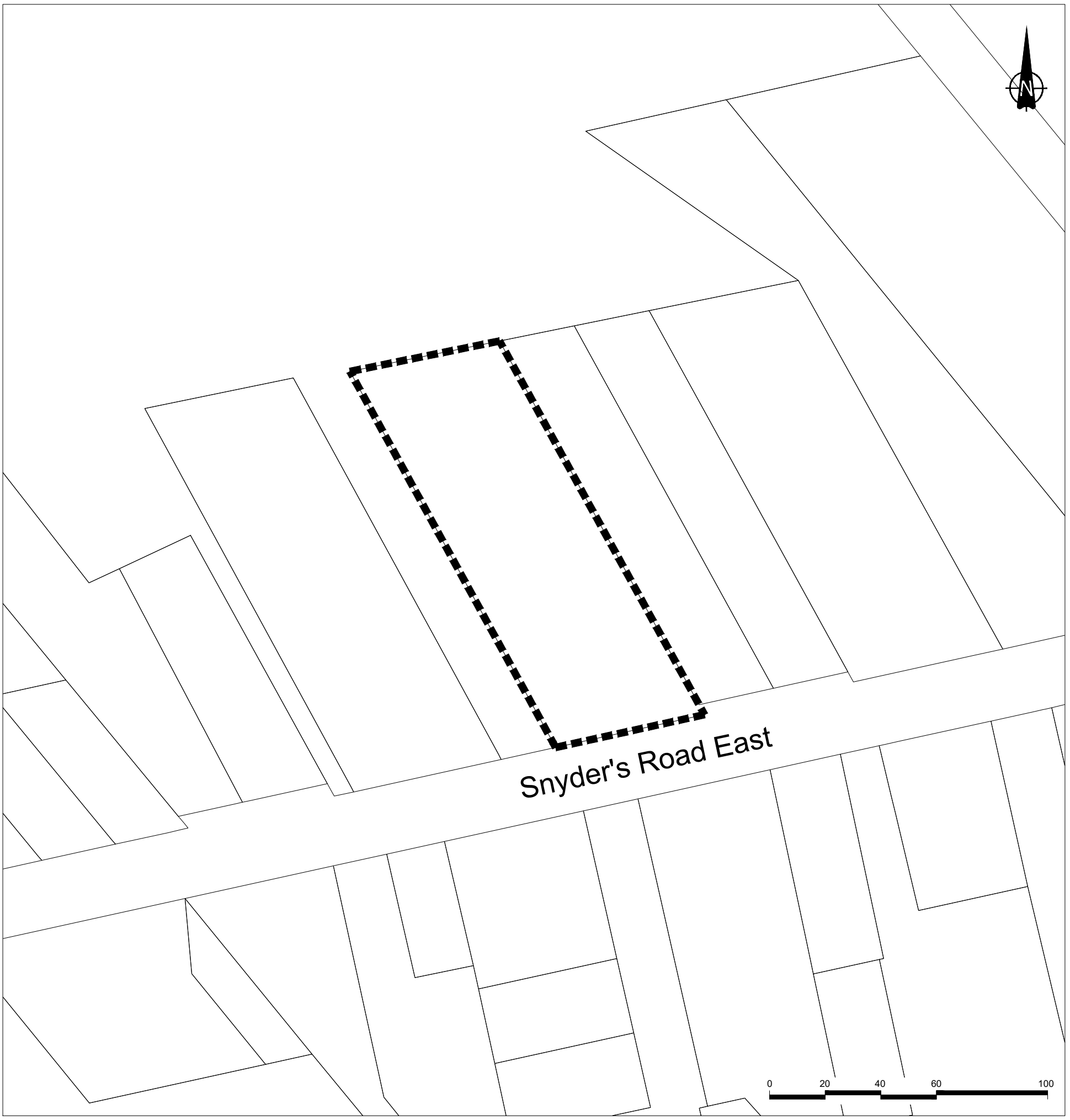
CLERK

Appendix “B” – Draft Zoning By-law Amendment Schedule

SCHEDULE "A"

CONCESSION NORTH OF SNYDER'S ROAD PART LOT 1
TOWNSHIP OF WILMOT

SUBJECT LANDS OUTLINED THUS: - - - - - - - - - - - - - -



This is Schedule "A" to By-law No. **2025-XX**

_____

Mayor

_____

Clerk