

June 26, 2026

NOTICE OF PASSING OF A ZONING BY-LAW AMENDMENT AND APPROVAL OF DRAFT PLAN OF SUBDIVISION BY THE TOWNSHIP OF WILMOT

On June 22, 2026, Council of the Corporation of the Township of Wilmot:

1. Passed **By-Law 2026-45** (amendment to Zoning By-law 83-38) under Section 34 of the Planning Act, R.S.O., 1990, as amended.
2. Approved **Draft Plan of Subdivision 30T-22602** under Section 51 of the Planning Act, R.S.O., 1990, as amended.

Zoning By-law Amendment

The by-law rezones lands to permit residential uses in the form of single detached dwellings and townhouse dwellings (street front, stacked and back-to-back) and other multiple dwellings along with associated regulations respecting lot size, building location and height. The by-law rezones open space and storm water management lands to an open space zone.

Draft Plan of Subdivision

The subdivision includes between 303 and 433 dwelling units in the form of single detached dwellings, townhomes and other multiple residential dwellings. The plan includes a storm water management area, walkways and trails, and an open space area for passive use and environmental protection.

Written and Oral Submissions

Written and oral submissions received related to these applications were addressed through the findings of the technical materials prepared in support of the development and through the approved draft approval conditions and zoning regulations.

Additional Information

Additional information, including the amending Zoning By-law and the Draft Plan of Subdivision, is available to be reviewed in person at the Township Administration Complex during regular office hours or online: <https://www.engagewr.ca/activa-baden-north-zca-1122-30t-22602>. The conditions of the draft plan of subdivision approval are included with this notice.

Appeals

A Notice of Appeal must be submitted to the Municipal Clerk **by 4:30pm on July 16, 2026**. You can submit your appeal in the following ways:

- Online: use the OLT's e-file service at <https://olt.gov.on.ca/e-file-service> by selecting Wilmot (Township of) as the Approval Authority (first-time users must register for a My Ontario Account). If the e-file portal is down, you can submit your appeal to planning@wilmot.ca.
- By mail or in-person: Appellant Form (A1) is available at <https://staging-oltontario.kinsta.cloud/forms-submissions/>.

This information is available in accessible formats upon request

A notice of appeal must set out the reasons for the appeal, and must be accompanied by the required fee (\$1,100) payable through the OLT e-portal or by certified cheque/money order made payable to the Minister of Finance. The Ontario Land Tribunal should be consulted for more information on the appeal process: www.olt.gov.on.ca. The Township of Wilmot appeal processing fee (\$1,096) must be paid directly to the Township in person or by mail and be received prior to or at the time of submission of the appeal.

Who can file an appeal?

Only the applicant and the Minister may appeal a decision of the municipality to the Ontario Land Tribunal (OLT).

With respect to the zoning by-law amendment, no person or public body shall be added as a party to the hearing of the appeal unless, before the by-law was passed, the person or public body made oral submissions at a public meeting or written submissions to the council or, in the opinion of the Ontario Land Tribunal, there are reasonable grounds to add the person or public body as a party.

With respect to the draft plan of subdivision, no person or public body shall be added as a party to the hearing of the appeal of the decision of the Township of Wilmot, including the lapsing provisions or conditions, unless the person or public body, before the decision of the Township of Wilmot, made oral submissions at a public meeting or written submissions to the council or, in the Ontario Land Tribunal's opinion, there are reasonable grounds to add the person or public body as a party.

Change to Conditions

The Township of Wilmot may change the conditions of draft approval at any time before the approval of the final plan of subdivision. You will be entitled to receive notice of any changes to the conditions of approval if you have made a written request to be notified of changes to the conditions.

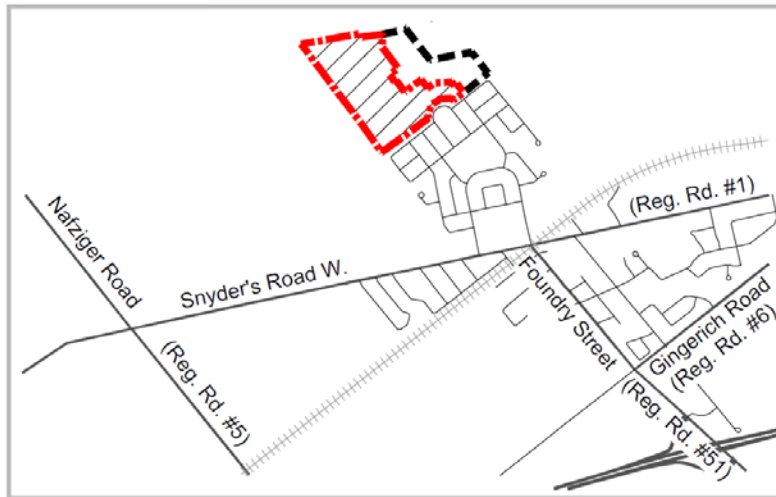
At any time before the final approval, the applicant, the Minister, or any public body that made submissions to the Township of Wilmot can appeal the conditions by submitting a Notice of Appeal to the OLT.

No person or public body shall be added as a party to the hearing of an appeal regarding any changes to the conditions of approval unless the person or public body, before Council made its decision, made oral submissions at a public meeting, if one was held, or written submissions to the Township of Wilmot, or made a written request to be notified of the changes to the conditions or, in the OLT's opinion, there are reasonable grounds to add the person or public body as a party.

If you have any questions or require additional information regarding these applications, please contact the undersigned.

Andrew Martin, MCIP RPP
Director, Development Services

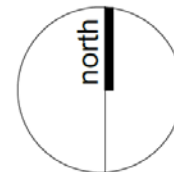
Key Plan



Subject Lands



Additional Lands
Owned by Applicant



SCALE: NTS

Decision on Draft Plan of Subdivision

Council of the Corporation of the Township of Wilmot approved the following recommendation on June 22, 2026:

“THAT Council, pursuant to Section 51(31) of the Planning Act R.S.O. 1990, C. P. 13, as amended, grant approval to Draft Plan of Subdivision 30T-22602, subject to the conditions included as “Attachment C” to Report DS 2026-13.”

The following, organized under the headings Conditions, Clearances, and Notes together form the Township of Wilmot’s draft approval conditions that are included as “Attachment C” to Report DS 2026-13.

Conditions

1. That this approval applies to plan of subdivision 30T-22602 by MHBC Planning Ltd., with a revision date of May 28, 2026, which identifies:

Blocks 1-14	singles, street townhomes, and back to back townhomes (186-276 units)
Blocks 15-16	townhomes, stacked townhomes and/or apartments (117-157 units)
Block 17	stormwater management
Block 18	open space
Block 19	hydro corridor
Block 20-22	trails and walkways
Blocks 23-28	reserve blocks (0.3m)
Streets 1-5	municipal streets

2. That the Subdivider agrees to stage and/or phase the development of this plan of subdivision in a manner satisfactory to the Township of Wilmot and Region of Waterloo.
3. That the Subdivider agrees that registration, and any request for model home occupancy for any model homes permitted by Condition 46 shall not occur until road access is made available through the draft approved subdivision to the west providing a direct connection to Snyder's Road West.
4. That the Subdivider agrees that where a retaining wall is located on private property, the following clause shall be included within the Subdivision Agreement which will be registered on title of the affected lots. Said agreement shall implement the following clause with respect to the retaining walls in all offers of purchase/sale and tenancy agreements:

“Purchasers/tenants are advised that a retaining wall is located at the rear/side of this property. The owner of this property owns his/her section of the retaining wall. The retaining wall is not in public ownership. Monitoring, maintenance, inspection, repair and replacement of this retaining wall, including any associated costs, are the sole responsibility of the property owner. The Township of Wilmot has no responsibility for this retaining wall. Should this retaining wall fail, it is the property owner's responsibility to repair or replace his/her section of the wall, at his/her cost. If the repair and/or failure of the retaining wall is deemed by the Township to be a public safety hazard, the Township will issue a work order on the affected property. If the repair/replacement of the retaining wall is not started and completed as outlined in the notice, the Township may undertake and complete the work. The cost of the work will be added to the property's taxes.”

5. That the following shall be conveyed to the Township of Wilmot for the purposes stated therein, at no cost and free and clear of all encumbrances:
 - a) Block 17 for stormwater management purposes.
 - b) Block 18-19 for open space purposes.

- c) Block 20-22 for trail and/or walkway purposes.
 - d) Blocks 23-28 for 0.3m reserves.
 - e) Street One, Street Two, Street Three, Street Four, and Street Five as municipal roads.
 - f) A 10.0m easement through Blocks 1 and 11 for overland drainage and a landscape buffer.
 - g) Condition 5b and 5c shall constitute the required conveyance in accordance with Section 51.1(1) of the Planning Act, R.S.O. 1990, c. P.13, as amended.
6. That the Subdivider shall enter into a subdivision agreement with the Township which will cover all planning and engineering aspects of the development and identify in detail applicable Township standards and specifications relative to municipal services. The agreement will further address all requirements, financial and otherwise of the Township of Wilmot concerning the provision of roads and the installation of services, facilities and drainage, landscaping, the payment of fees and provision of financial securities and deposits to ensure the proper and orderly completion of the development.
7. That prior to undertaking detailed engineering design for the subdivision, the Subdivider shall provide design guidelines to the satisfaction of the Township, addressing at minimum the following:
- a) That, wherever possible, driveways to be paired to allow greater opportunities for on-street parking.
 - b) Promote a detailed design strategy that minimizes the need for swales/drainage features on one side of a dwelling in an effort to allow unobstructed side entrances and pathways to the rear of the property. This may include consideration of pairing drainage swales on one side of the dwelling.
 - c) Stipulate that mechanical equipment (air conditioner, heat pumps etc.) be provided at the rear of the dwelling or within the same side as paired drainage solutions identified in item (b).
 - d) Design the subdivision to eliminate the need for retaining walls whenever feasible.
 - e) Design multiple blocks such that front entrances face the municipal street and that back lotting be avoided.
 - f) Include traffic calming measures on municipal streets such as raised intersections and trail crossings, boulevard bump outs within parking lanes to intermittently narrow the street etc.
8. That no grading or site alteration shall occur until such time as the subdivision agreement has been registered, and all approvals (municipal or otherwise) have been granted related to said grading or site alteration to the satisfaction of the Township.
9. That prior to any grading or construction on site and prior to registration of the plan, the owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority and the Township of Wilmot:
- a) A detailed storm water management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual";
 - b) A detailed Lot Grading, Servicing and Storm Drainage Plan;
 - c) An Erosion and Siltation Control Plan in accordance with the Grand River Conservation Authority's Guidelines for sediment and erosion control, indicating the means whereby erosion will be minimized and silt maintained on-site throughout all phases of grading and construction; and,
 - d) The submission and approval of a Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Permit from the GRCA (if required) prior to grading in a regulated area and/or construction of the Stormwater Management outlet in a regulated area.
10. That the Subdivider agrees to complete and maintain the works in accordance with the approved plans and reports noted in Condition 9, above.
11. That prior to commencement of area grading or site servicing within the development, the Subdivider shall confirm that a legal outlet for post-development stormwater flows has been secured to the satisfaction of the Township.

12. That prior to commencement of area grading, where use of lands abutting the subdivision is required (for grading or access), the Subdivider shall provide written authorization from the land owner for such work occur.
13. That prior to registration of the plan (or the first stage if staging is approved) the Subdivider shall confirm that a legal outlet for sanitary sewer flows has been secured to the satisfaction of the Township.
14. The Subdivider agrees to obtain and comply with all necessary Provincial, Regional, Township, and GRCA approvals with respect to sanitary sewer, watermain, and stormwater management works.
15. That prior to registration, the Subdivider shall make satisfactory arrangements with Enova Power Corp for the provision of permanent electrical services to the plan, with all electrical servicing within the plan be underground unless deemed not feasible by Enova, and that wood poles will not be utilized within the plan.
16. The Subdivider further agrees that should permanent installations be impractical at the time, to pay all costs incurred through the provision of temporary electrical services and the removal of such services when permanent installations are possible.
17. That street lighting shall be provided at the owner's expense in accordance with the standards and specifications of the Township of Wilmot, the Region of Waterloo and Enova Power Corp.
18. That prior to registration, the Subdivider agrees to make satisfactory arrangements with a telecommunications provider for the provision of permanent or temporary telecommunication services to this plan.
19. That prior to registration, the Subdivider agrees to make satisfactory arrangements with Enbridge Gas Inc. for the provision of necessary easements and/or agreements for the provision of gas services to this plan.
20. That prior to or concurrent with the registration of any Stage the Subdivider shall grant any easements required for utility or municipal servicing purposes to the appropriate authority.
21. That the Subdivider shall provide a master utility locate plan for hydro (including street lights) and all other utilities prior to final approval of the detailed engineering. The Subdivider's engineer is responsible to review the utility submission to ensure there are no conflicts with sewer, watermains, driveways, sidewalks, multi-use trails, boulevard trees, and signage. At such time as the Subdivider's engineer has reviewed the utility drawings a clearance letter is to be provided to the Township for each utility.
22. That prior to registration, the Subdivider agrees to make satisfactory arrangements with Canada Post and the Township of Wilmot for the provision of necessary easements for the provision of mail services to this plan in a form satisfactory to the Township of Wilmot.
23. That the Subdivider shall indicate to prospective purchasers in all offers of purchase and sale that mail delivery will be from a designated centralized mailbox and, that the location of the centralized mailbox shall be determined prior to the closing of any home sale to the satisfaction of Canada Post and the Township of Wilmot.
24. That prior to registration, the Subdivider shall satisfy all of the following requirements to the satisfaction of the Waterloo Region District School Board (WRDSB):
 - a) That the Owner/Developer must agree in the Subdivision Agreement and/or Site Plan Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease:

- i) “Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school.”
 - ii) For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information.
 - iii) “In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained rights-of-way to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point.”
 - b) That the Owner/Developer supply, erect and maintain a sign (at the Owner/Developer's expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner/Developer shall submit a photo of the sign for review and approval of the WRDSB.
25. That prior to registration, the Subdivider shall satisfy all of the following requirements to the satisfaction of the Waterloo Catholic District School Board (WCDSB):
- a) That the Owner/Developer and the WCDSB reach an agreement regarding the supply and erection of an advisory sign, at the Owner/Developer's expense and according to the WCDSB's specifications, advising prospective residents about the WCDSB's Holding Zone designation applied to the subject property.
 - b) That the Owner/Developer shall include the following wording in the subdivision agreement and any future site plan agreement and/or condominium declaration to advise all purchasers of residential units and/or renters of the same:
 - i. “Waterloo Catholic District School Board present and future families—please note that your new home is located in an area that has been designated as a Holding Zone as we await construction of new school(s) or additional capacity. Students may be accommodated temporarily in a Holding School(s). Please visit www.wcdsb.ca/accommodations for additional information.”
 - c) That the developer shall include the following wording in the subdivision agreement to advise all purchasers of residential units and/or renters of same:
 - i. “In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained rights-of-way to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point.”
 - d) That any Education Development Charges shall be collected prior to the issuance of building permit(s).
26. That prior to registration, the Subdivider shall satisfy all of the following requirements of Hydro One Networks Inc. (HONI):
- a) Prior to HONI providing its final approval, the developer must make arrangements satisfactory to HONI for review and approval of lot grading and drainage plans identifying the transmission corridor, location of towers within the corridor and any proposed uses within the corridor and confirming drainage is controlled and does not impact the transmission corridor.
 - b) Any development in conjunction with the subdivision must not block vehicular access to any HONI facilities on the transmission corridor. During construction, there must be no storage of materials or mounding of earth, snow or other debris in the transmission corridor.
 - c) At the Subdivider's expense, temporary fencing must be placed along the transmission corridor prior to construction and permanent fencing must be erected where subdivision lots directly abut the transmission corridor after construction is completed.
 - d) The costs of any relocations or revisions to HONI facilities which are necessary to accommodate this subdivision will be borne by the Subdivider. The Subdivider will be responsible for restoration of

any damage to the transmission corridor or HONI facilities thereon resulting from construction of the subdivision.

e) HONI's easement rights must be protected and maintained.

27. That the Subdivider shall submit a landscaping plan prepared by a qualified landscape architect for the 10.0m easement referenced in Condition 5f, the walkway and trail blocks, the open space blocks, and the stormwater management block to the satisfaction of the Township. The approved landscape plan shall set out the location of all pathways and sidewalks, the ground cover for each block, lighting, plantings, and fencing/bollard requirements and shall form a part of the subdivision agreement between the Township and the Subdivider.
28. That a qualified landscape architect shall provide a document outlining the landscaping specifications, along with tree species, planting locations, and maintenance requirements for all trees planted within boulevards and lands to be conveyed to the Township. This document shall be prepared in consultation with Appendix C of the Township Tree Canopy Policy Framework 2023 and to the satisfaction of the Township.
29. That the Subdivider shall landscape the blocks and boulevards as required by Conditions 27 and 28 in accordance with the approved plans and documents for each phase.
30. That the Subdivider agrees to construct at the same time as all other road works within the plan (or within the first stage if staging is approved), traffic calming measures on Isaac Shantz Drive and Jacob Cressman Drive, that may include those measures listed in Condition 7f, to the satisfaction of and in partnership with the Township of Wilmot.
31. That the Subdivider agrees to construct, in accordance with the approved plans and within the timeframe and financing schedule outlined below, works within the 10.0m easement referenced in Condition 5f, the open space, walkway, and trail blocks, as set out in the approved plans to the satisfaction of the Township.
 - a) Grading, topsoiling and seeding shall be completed prior to occupancy of the first unit within the stage within which the open space, walkway or trail blocks are located or in the event of winter conditions by June 1st immediately following the issuance of the first occupancy permit.
 - b) Construction of the landscaping within 10.0m easement referenced in Condition 5f and trails within the open space, walkway, and trail blocks shall be completed within one year of registration or servicing the stage within which such blocks are located, whichever occurs first.
 - c) The applicable costs associated with works in the 10.0m easement referenced in Condition 5f, the open space, walkway and trail blocks, such as trail construction, grading, topsoiling, seeding, sodding, landscaping, servicing, signage in accordance with the approved plans shall be paid for by the Subdivider.
32. That further to Condition 31:
 - a) The Subdivider, in partnership with the owner of the lands immediately to the west, and at no cost to the Township, shall construct an asphalt 3.0m multi-use trail (MUT) through the 3.0m wide Block 20 and 21 and the abutting 3.0m on lands to the west.
 - b) The Subdivider shall construct a 3.0m wide MUT (surface to be determined through detailed design) through Block 17 and 18 linking Block 20 to Street 5.
 - c) The Subdivider, at their cost, shall construct an asphalt 3.0m MUT through Block 22.
33. That the Subdivider shall design the stormwater management blocks including municipal trails within or abutting the stormwater management block, in accordance with the approved plans prior to the first registration. When trails within or abutting stormwater management blocks serve a combined function for maintenance access, the trails shall be constructed to the standard required for maintenance access or a minimum of 3.0m wide, whichever is greater.

34. That sidewalks on all streets shall be constructed to the standard, in the location and of the width specified by the Township of Wilmot.
35. That all blocks to be conveyed to the Township of Wilmot shall be fenced or otherwise appropriately delineated to the satisfaction of the Township.
36. That all offers of purchase, sale, or lease for single detached, semi-detached, or street fronting townhome dwellings, shall include the following clause and that, prior to occupancy, the Subdivider or subsequent builder be required to conspicuously post this clause on the inside of the overhead garage door:

"Parking

Purchasers or tenants are advised that this property consists of a maximum driveway width of "x" (x to be specified based on the specific lot). This dwelling includes an attached garage that, combined with the driveway, provides available parking of "x" spaces (x to be determined based on the specific lot). Parking is only permitted within the attached garage and driveway. The driveway may not be widened, nor can a walkway be constructed beside the driveway to expand its width in accordance with the Township of Wilmot Zoning By-law. Occupants of this dwelling are advised that if they have more than "x" vehicles (x to be the number of parking spaces previously identified) and/or they do not intend to park within the garage, this property may not be suitable for their needs. Please note that on-street parking cannot be relied upon for daily parking needs.

Site alterations

Please be aware that this property is designed to adequately address surface drainage with surface water typically being conveyed along property lines. Water may stand on the surface during rain events. No alterations to grading, landscaping (raised gardens, retaining walls etc.), and no hard surfacing is permitted within 0.6m of any property line as set out in the Township of Wilmot Zoning By-law."

37. That the Subdivider agrees to provide all prospective purchasers with a copy of the grading control plan and a copy of the subdivision agreement.
38. That all streets, including the approved entrance locations to lots/blocks, shall be constructed by the Subdivider in accordance with the specifications and requirements of the Township.
39. That the detailed engineering design include an entrance and on-street parking location plan to the satisfaction of the Township of Wilmot including all entrance locations, widths, and surface treatments.
40. That the streets shall be named to the satisfaction of the Township of Wilmot and said names shall be assigned by the Township of Wilmot, in consultation with the Region of Waterloo, within the Subdivision Agreement and identified on the subdivision plan prior to registration.
41. That, prior to issuance of building permits, the Subdivider shall pay for and install all regulatory street signs.
42. That the Subdivider shall indicate to prospective purchasers in all offers of purchase and sale that mail delivery will be from a designated centralized mailbox and, that the location of the centralized mailbox shall be determined prior to the closing of any home sale.
43. That the Subdivider shall ensure the provision of a potable water supply to each lot to the satisfaction of the Township of Wilmot and Region of Waterloo.
44. That the access and egress for all construction traffic, for the life of the development, shall be from Snyder's Road West by way of draft approved subdivision 30T-21601 or an alternate location to the satisfaction of the Township.

45. That the Subdivider shall erect a sign at the entrance to the subdivision in a location satisfactory to the Township at the Subdivider's expense, which identifies all blocks within the approved plan of subdivision and which identifies the zoning and use of each block. The sign shall also identify the location of the construction access. The design of the sign shall be submitted to the Township of Wilmot for approval prior to its erection. The Subdivider shall be responsible to obtain a building permit for said sign if a permit is required. Upon completion of the subdivision the sign shall be removed at the expense of the Subdivider.
46. That a maximum of 3 single detached model home units and 2 model home townhome blocks may be constructed prior to registration of the development provided that no residential occupancy of any model home may be permitted until such time as the subdivision plan is registered.
47. That no development (except area grading authorized by a subdivision agreement) shall occur within Block 15 or 16 until site plan approval has been granted by the Township.
48. That prior to release of the plan for registration, the Subdivider shall pay all legal fees incurred by the Township related to the processing and approval of the plan.
49. That prior to registration of the subdivision agreement and prior to release of the plan for registration, the Subdivider shall pay the Township Development Services subdivision registration fee in accordance with the Township Fees and Charges By-law.
50. That prior to the release of the plan for registration, the Subdivider shall pay the Township Infrastructure Services subdivision review administration fee and subdivision drawing and construction review fees in accordance with Township Fees and Charges By-law.
51. That the Subdivider agrees to pay the development charge in force at the time of building permit issuance at the time prescribed by the Development Charges Act, 1997, S.O. 1997, c. 27, as amended.
52. That the Subdivider agrees to contribute to affordable housing within the Township by:
 - a) Contributing directly to an affordable housing project approved for development within the Township of Wilmot in an amount no less than \$500 per residential unit in the plan, or
 - b) Constructing affordable housing units with the plan, or
 - c) Providing an affordable housing contribution to the Township of Wilmot for each residential unit developed within the plan, which contribution will be paid and used in accordance with the following:
 - i) the affordable housing contribution shall be \$500 per residential unit, regardless of unit type, and shall not be subject to indexing or any other increase;
 - ii) the affordable housing contribution is payable for each residential unit in the plan, and shall be collected by the Township, at the time of issuance of a building permit for the unit(s);
 - iii) the affordable housing contribution shall not be payable in respect of any subsequent secondary/accessory units or suites within a single detached, semi-detached or townhouse unit, or in respect of any non-residential development;
 - iv) the affordable housing contributions paid by the Subdivider will be used by the Township toward the capital costs of a planned affordable housing project that is otherwise fully funded and approved, and may be given by the Township to a not-for-profit affordable housing corporation for that purpose or used by the Township to acquire land to be conveyed to such a corporation for that purpose; and
 - v) the payment of the affordable housing contribution by the Subdivider pursuant to this condition shall be in full satisfaction of any and all requirements respecting the contribution to or provision of affordable or social housing in respect of the development of the lands within the plan, and, for greater certainty, the lands shall not be subject to any inclusionary zoning by-law and the

Subdivider shall be exempt from any development charge imposed by the Township in respect of affordable or social housing.

53. That subject to Conditions 1 to 52 herein, the Subdivider shall satisfy all of the conditions of the Region of Waterloo listed under the heading “Regional Conditions of Draft Approval” contained in their letter dated February 5, 2026 and included as Attachment “D” to Township report DS 2026-13. The conditions of the Region of Waterloo are deemed to be modified to exclude Condition 2, to be “to the satisfaction of the Region of Waterloo and/or the Township of Wilmot” and that any development agreement referenced in the conditions, if deemed appropriate by the Township of Wilmot and Region of Waterloo, may be with the Township of Wilmot.
54. That prior to release of the plan for registration, the Subdivider will provide the Township of Wilmot with a detailed description of how each condition of draft approval has been satisfied.
55. Draft approval by the Township of Wilmot shall lapse five years from the date of draft approval subject to the provisions of Section 51(32) to 51(33.3) of the Planning Act, R.S.O. 1990, c. P.13, as amended.



**Attachment D
Report DS 2026-13**

**PLANNING, DEVELOPMENT
AND LEGISLATIVE SERVICES**

150 Frederick Street, 8th Floor
Kitchener ON N2G 4J3 Canada
Telephone: 519-575-4400
TTY: 519-575-4608
Fax: 519-575-4449
www.regionofwaterloo.ca

Matthew Colley
519-577-6241
File: D18-20/22602
February 5, 2026

Andrew Martin

(sent via email)

**Re: Updated Post Circulation Comments
Plan of Subdivision Application 30T-22602,
Zoning By-law Amendment ZCA-11/22
Part of Lot 14 and 15, Concession North of Snyder's Road
Activa Holdings Inc. / MHBC
TOWNSHIP OF WILMOT**

The Region has prepared the following updated post circulation comments for the above-noted applications for draft plan of subdivision, and zoning by-law amendment. The purpose of these comments is to identify any items which need to be addressed prior to draft approval and those that can be imposed as conditions of draft approval of the plan of subdivision.

The owner/applicant is proposing a residential plan of subdivision on 17.324 hectares of land located at the west end of Baden, immediately adjacent to an existing residential community located to the south of the subject lands. The subject lands are located within the Baden Settlement Area and are bounded by residential land uses to the south, agricultural land uses to the east and west, and open space and designated woodland to the north.

The subject lands are designated as Township Designated Greenfield Area in the Regional Official Plan and are within the Urban Area Boundary. The lands are adjacent to the Countryside Line. The lands are zoned as Agricultural in the Township's Zoning By-Law No. 83-38.

The Draft Plan, revised October 1, 2025, and now proposes between 302-431 residential units. This includes 185-274 singles, street townhouses, and back to back townhouses; 117-157 multi-residential townhouses; and a Stormwater Management Facility (SWM). This includes road connections to the residential lands to the south via Issac Shantz Drive and Jacob Cressman Drive. In addition, there are road connections proposed to the west through draft approved Plan of Subdivision 30T-21601.

Document Number: 4385619

Zoning By-Law Amendment application ZCA-11/22 proposes to re-zone the subject lands to permit the different residential land uses as proposed on the Draft Plan of Subdivision. The proposed SWM Block is to be designated as Open Space. The proposal also includes second dwelling units as permitted by the Township Official Plan.

REGIONAL COMMENTS

Zoning By-Law Amendment:

Regional Staff have **no objections** to Zoning By-Law Amendment Application ZCA-11-22.

Draft Plan:

Regional Staff have reviewed the revised draft plan (October 1, 2025) submitted and have no concerns. The following condition of draft approval is required:

- 1) That prior to final approval, the Owner assign street names to the internal roadways on draft plan of Subdivision 30T-22602, prepared by MHBC Planning, File No. 8784BB dated October 1, 2025 or any further revision, in consultation with the Regional Municipality of Waterloo, to the satisfaction of the Regional Municipality of Waterloo.

Housing Comments:

The following updated comments have been provided from Housing Staff. The following Regional policies and initiatives support the development and maintenance of affordable housing:

- Regional Strategic Plan
 - Objective 4.2 requires the Region to make affordable housing more available to individuals and families.
- 10-Year Housing and Homelessness Plan
 - contains an affordable housing target which is that 30% of all new residential development between 2019 and 2041 in Waterloo Region is to be affordable to low and moderate income households.
- Building Better Futures Framework
 - shows how the Region plans to create 2,500 units of housing affordable to people with low to moderate incomes by 2025.
- Region of Waterloo Official Plan
 - Section 3.A (Range and Mix of Housing) contains land use policies that ensure the provision of a full and diverse range and mix of permanent housing that is safe, affordable, of adequate size, and meets the accessibility requirements of all residents.

The Region supports the provision of a full range of housing options, including affordable housing. Rent levels and house prices that are considered affordable according to the Regional Official Plan are provided below in the section on affordability. Should this application be approved, Regional Staff recommend that the owner/applicant consider providing a number of affordable housing units on the site, as defined in the Regional Official Plan.

In order for affordable housing to fulfill its purpose of being affordable to those who require rents or purchase prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.

In addition, Regional Staff recommend considering other ways of providing a mix of housing types on the site, such as secondary dwelling units within or accessory to the residential dwellings.

Policy 3.A.6 of the ROPA 6 applies to this site and states:

“Where a development application proposing residential uses is submitted for a site containing one hectare or more of developable land, the Region and the area municipalities will require, a minimum of 30 percent of new residential units to be planned in forms other than single-detached, semi-detached, and street fronting and single unit condominium townhouse units. Examples of other potential housing forms may include, but are not limited to: duplexes; tri-plexes; four-plexes; multi-plexes; stacked and back-to-back townhouses; and apartments.”

The proposed draft plan of subdivision indicates that over 40% of the units are planned for a multi-residential form - which the footnote on the draft plan indicates means cluster townhomes – and thus adheres to Policy 3.A.6. Regional Staff have no further concerns.

Affordability

For the purposes of evaluating the affordability of an ownership unit, based on the definition in the Regional Official Plan, the purchase price is compared to the least expensive of:

Housing for which the purchase price results in annual accommodation costs which do not exceed 30 percent of gross annual household income for low and moderate income households	\$385,500
Housing for which the purchase price is at least 10 percent below the average purchase price of a resale unit in the regional market area	\$576,347

*Based on the most recent information available from the PPS Housing Tables (2021).

In order for an owned unit to be deemed affordable, the maximum affordable house price is \$385,500.

For the purposes of evaluating the affordability of a rental unit, based on the definition of affordable housing in the Regional Official Plan, the average rent is compared to *the least expensive of*:

A unit for which the rent does not exceed 30 per cent of the gross annual household income for low and moderate income renter households	\$1,470
A unit for which the rent is at or below the average market rent (AMR) in the regional market area	Bachelor: \$950 1-Bedroom: \$1,134 2-Bedroom: \$1,356 3-Bedroom: \$1,538 4+ Bedroom: \$3,997

*Based on the most recent information available from the PPS Housing Tables (2021)

In order for a rental unit to be deemed affordable, the average rent for the proposed units which have fewer than 3 bedrooms must be at or below the average market rent in the regional market area as shown above. For proposed units with three or more bedrooms, the average rent for the units must be below \$1,470.

Please do not hesitate to contact me directly by email at Mbaya@regionofwaterloo.ca should you have any questions or wish to discuss in more detail.

Functional Servicing Report

Regional staff have reviewed the provided Functional Servicing Report by Stantec dated November 2025 and provide the following comments:

- Note that a detailed FUS calculation is required for development applications rather than the simplified methodology. The detailed methodology is likely to yield a higher FUS target for the high density, contiguous multi-block homes compared to the simplified 133 L/s.
- The owner/applicant should be aware that future fire flow targets were identified through the Baden – New Hamburg Water and Wastewater System Servicing Review (Stantec, C3 Water, September 2023)

Section 5.1.7 Revised Future Fire Flow – 175 L/s for multi-residential fire flow

As a condition of draft approval, please circulate an updated FSR for Regional review.

Hydrogeology and Source Water Protection

Regional Staff acknowledge the subject lands are located outside of any designated Wellhead Protection Areas. Regional Staff support best practices for a water balance where pre-development infiltration is equal to post development infiltration.

Salt Management Plan:

As a condition of draft approval, the developer will be required to enter into an agreement to complete a Salt Management Plan to the satisfaction of the Region, at Site Plan or future draft plan of Condominium, for any development blocks proposing private parking lots and/or private roads. As part of the plan, Regional staff encourages the proponent to incorporate design considerations with respect to salt management, including:

- Ensure that cold weather stormwater flows are considered in the site design. Consideration should be given to minimize the transport of meltwater across the parking lots or driveway. This also has the potential to decrease the formation of ice and thereby the need for de-icing.
- Directing downspouts towards pervious (i.e. grassy) surfaces to prevent runoff from freezing on parking lots and walkways.
- Locating snow storage areas on impervious (i.e. paved) surfaces in close proximity to catch basins.
- Using winter maintenance contractors that are Smart About Salt™ certified.
- Using alternative de-icers (e.g. pickled sand) in favour of road salt.

The proponent is eligible for certification under the Smart About Salt™ program for this property. Completion of the Salt Management Plan is one part of the program. To learn more about the program and to find accredited contractors please refer to:

<http://www.smartaboutsalt.com/>. Benefits of designation under the program include cost savings through more efficient use of salt, safe winter conditions by preventing the formation of ice, and potential reductions in insurance premiums.

Transit Planning

Grand River Transit (GRT) does not have plans to expand the existing fixed-route (77 Wilmut) to the proposed subdivision, or introduce new on-demand service within the built-up urban area of Baden as part of its GRT Business Plan / Township Transit Strategy. As such there are no transit infrastructure requirements for this proposed subdivision.

Transportation Impact Study:

Regional Staff have previously reviewed the report entitled, “1012 Snyder’s Road West, Baden ON, Transportation Impact Study”, authored by Paradigm Transportation Solutions Limited (April 2021), addendum letter (December 14, 2023) and supplementary information entitled, “Snyder’s Road West & Christian Street/Street One Traffic Control & Configuration” (June 2024) all authored by Paradigm Transportation Solutions Limited. These studies were completed with regards to the lands to the west

(Subdivision File - 30T-21601) and implementation of those technical materials are secured through its draft approval.

Regional Staff have no other comments or concerns with regards to this development as it does not front onto a Regional Road.

Waste Management

Regional Staff advise that if classified as separate residentially-zoned and occupied properties, all residential properties with 6 or fewer units referenced in this application would all be eligible to receive curbside waste collection provided by the Region of Waterloo. Each residential property will be able to participate independently from the other as long as each property has a driveway that faces onto a municipally maintained roadway.

Regional Staff advise that for any private condominium sites in this area, these sites will be required to be assessed independently once plans for those properties are available. It is up to Regional staff discretion to formally activate properties onto the residential curbside collection program.

The Region will activate properties once a particular street has been completed and assumed by the municipality responsible, construction and occupancy have been completed, and a sufficient turnaround or drive-through access has been provided. Collection trucks are prohibited from reversing and must maintain a forward-moving direction at all times. Until streets can be activated for Regional waste services, the home builder is responsible for all residentially generated waste and must provide an option to residents to dispose of their waste.

Regional Conditions of Draft Approval:

Regional Staff have **no objections** to the draft approval of Plan of Subdivision 30T-22602 for Aactiva Holdings Inc, prepared by MHBC Planning, File No. 8784BB dated October 1, 2025, subject to the following conditions:

- 1) That the Owner agrees to stage and/or phase the development of this plan of subdivision in a manner satisfactory to the Township of Wilmot and the Regional Municipality of Waterloo.
- 2) That prior to final approval, the Owner assign street names to the internal roadways on draft plan of Subdivision 30T-22602, prepared by MHBC Planning, File No. 8784BB dated October 1, 2025 or any further revision, in consultation with the Regional Municipality of Waterloo, to the satisfaction of the Regional Municipality of Waterloo.
- 3) That prior to final approval, the Owner enter into a registered development agreement with the Regional Municipality of Waterloo agreeing to complete a Salt Management Plan (SMP, prior to Site Plan approval, for Block 16 and Block 17, to the satisfaction of the Regional Municipality of Waterloo.

- 4) That prior to final approval, the owner/developer submit an updated Functional Servicing Report to the satisfaction of the Regional Municipality of Waterloo.
- 5) That prior to final approval, the Owner
 - a. That the Owner enters into an Agreement for Servicing with the Regional Municipality of Waterloo to preserve access to municipal water supply and municipal wastewater treatment services prior to final approval or any agreement for the installation of underground services, whichever occurs first. Where the Owner has already entered into an agreement for the installation of underground servicing with the area municipality, such agreement shall be amended to provide for a Regional Agreement for Servicing prior to registration of any part of the plan. The Regional Commissioner of Transportation and Environmental Services shall advise prior to an Agreement for Servicing that sufficient water supplies and wastewater treatment capacity is available for this plan, or the portion of the plan to be registered.
 - b. That the Owner include the following statement in all agreements of lease or purchase and sale that may be entered into pursuant to Section 52 of the Planning Act, prior to the registration of this plan:
 - i. "The lot, lots, block or blocks which are the subject of this agreement of lease or purchase and sale are not yet registered as a plan of subdivision. The fulfillment of all conditions of draft plan approval, including the commitment of water supply and sewage treatment services thereto by the Region and other authorities, has not yet been completed to permit registration of the plan. Accordingly, the purchaser should be aware that the vendor is making no representation or warranty that the lot, lots, block or blocks which are the subject of this agreement of lease or purchase and sale will have all conditions of draft plan approval satisfied, including the availability of servicing, until the plan is registered."

Notes

- 1) Most of the Regional Municipality of Waterloo conditions can be satisfied through an agreement. The onus is on the Owner/Developer to contact Regional Staff in writing to request the preparation of such an agreement. A copy of the reference plan showing the lands to be registered that are affected by the agreement and the conditions to be covered by the agreement should be provided. The fees for the preparation and registration of this agreement, payable to the Regional Municipality of Waterloo, are in accordance with the Regional Municipality of Waterloo Fee By-Law 25-066, or any successor thereof.

- 2) The Owner/Developer is advised that draft approval is not a commitment by the Regional Municipality of Waterloo to water and wastewater servicing capacity. To secure this commitment, the Owner/Developer must enter into an "Agreement for Servicing" with the Regional Municipality of Waterloo by requesting that the Region's Planning, Development and Legislative Services Department initiate preparation of the agreement. When sufficient capacity is confirmed by the Region's Commissioner of Transportation and Environmental Services to service the density as defined by the plan to be registered, the Owner/Developer will be offered an "Agreement for Servicing." This agreement will be time limited and define the servicing commitment by density and use. Should the "Agreement for Servicing" expire prior to plan registration, a new agreement will be required.

Summary

The Region acknowledges the receipt of the required fees for the proposed draft plan of Subdivision application. Additional fees may be incurred as part of satisfying individual draft approval conditions.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

A handwritten signature in dark ink, appearing to read "Matthew Colley", written over a light blue horizontal line.

Matthew Colley, MCIP, RPP
Senior Planner

cc. Rachel Wolff, MHBC Planning
Pierre Chauvin, MHBC Planning