Planning Justification Report

Estate of Enid Schmidt

Township of Wilmot

Zoning By-law Amendment

May 2026

GSP group

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Prepared for:
Estate of Enid Schmidt
c/o Brian Kelly
20 Erb Street West, Suite 803
Waterloo, ON
N2L 1T2

Prepared by:
GSP Group Inc.
72 Victoria Street South, Suite 201
Kitchener, ON
N2G 4Y9

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1. Introduction

1.1 Background

GSP Group was retained in 2011 by Kelly & Co., Barristers and Solicitors, on behalf of the Estate of Enid Schmidt (the "Estate") to provide land use planning consulting services for the Estate's landholdings within the Baden community in the Township of Wilmot. Harold and Enid Schmidt, the former registered owners, had acquired a number of properties within the Township of Wilmot over the years, and upon their death, the Schmidt Estate was donated to two local churches. Since 2011, GSP Group has been providing land use planning services to the Estate regarding assessment of the land use planning policy and regulatory framework affecting the properties to determine the short-to long-term use and development potential of each of the landholdings.

Further to this planning advice, GSP Group is now coordinating the necessary planning approvals for a number of properties within the Estate's landholdings to prepare them for disposition and development by the end purchaser. This application is for 14.1-hectares of land, comprised of two parcels, located on the north side of Gingerich Street, west of Foundry Street and abutting Baden Creek (the "Site") (**See Figure 1**).



Aerial View of the Site

Source:Waterloo Region Interactive Mapping (2024)

Figure 1

1.2 Report Context and Structure

The Planning Justification Report (the "Report") has been prepared as a complete application requirement in support of the Subject Application. Its purpose is to provide an overview of the Site, the planning context, to evaluate the proposed Zoning By-law Amendment application in this context and provide planning justification for the proposed zoning changes.

The objectives of this Report are as follows:

- To provide an overview of the Site, including site description and surrounding uses;
- To provide a brief summary of the Subject Application;
- To provide a summary of existing planning policies and regulations that apply to the Site; and,
- To provide a planning justification for the Subject Application.

2. Site Overview and Context

2.1 Site Location and Description

The Site is located within the Region of Waterloo, in the Township of Wilmot, located along the north side of Gingerich Street to the west of Foundry Street in the Baden community, north of Highway 7 & 8, and south of Snyder's Road West. It is comprised of two parcels, legally described as:

- Part of Lot 16 South of Snyder's Road, being Part of Part 4 Plan 58R-15186 (being north and east of Parts 1 and 2 Plan 58R-21084); and
- Part of Lot 15 South of Snyder's Road, being Part 4 Plan 58R-18307 save and except Part 3 Plan 58R-18584

The two parcels are separated by a right of way owned by the Township that is intended to provide a future trail connection from Gingerich Road to the planned development to the north. Of note, the Site does not have frontage on Foundry Street; the lands to the immediate northeast of the Site are owned by the Township.

2.2 Existing Site Conditions

The Site contains agricultural farmland that area no longer in use. The Site abuts the Baden Creek and its tributaries. Two ephemeral drainage features exist near the northwesterly limits of the westerly parcel of the Site. The Site is within the associated floodplain, which is regulated by the Grand River Conservation Authority (GRCA), see **Figure 2.** Baden Creek

runs adjacent to the Site, alongside the northerly and northeasterly edges of the Site into a culvert on Gingerich Road. No wetlands or woodlots have been identified on the subject lands.

There is a small, wooded area located to the north of the westerly parcel extending slightly onto the Site.

The natural features and the buffers recommended by Natural Resource Solutions Inc. (NRSI), further discussed in **subsection 5.5** of this Report. The proposed Zoning Amendments which incorporate the recommendations prepared by NRSI can be found in **subsection 4.2** of this Report.



GRCA Mapping

Source:Walter Fedy (2025)

Figure 2

2.3 Baden Sanitary Trunk Sewer

The Baden Sanitary Trunk Sewer, including culvert improvements, has been constructed. Its alignment traverses the site, generally along the northeasterly and northerly edges. Following the sewer's relocation, the associated land is being transferred to the Township. The delineation of the sewer alignment and the land for transfer is shown in **Figure 3**.

2.4 Surrounding Uses and Context

The surrounding lands are primarily agricultural land which are no longer being used for farming purposes, residential neighbourhoods, commercial establishments, and industrial uses.

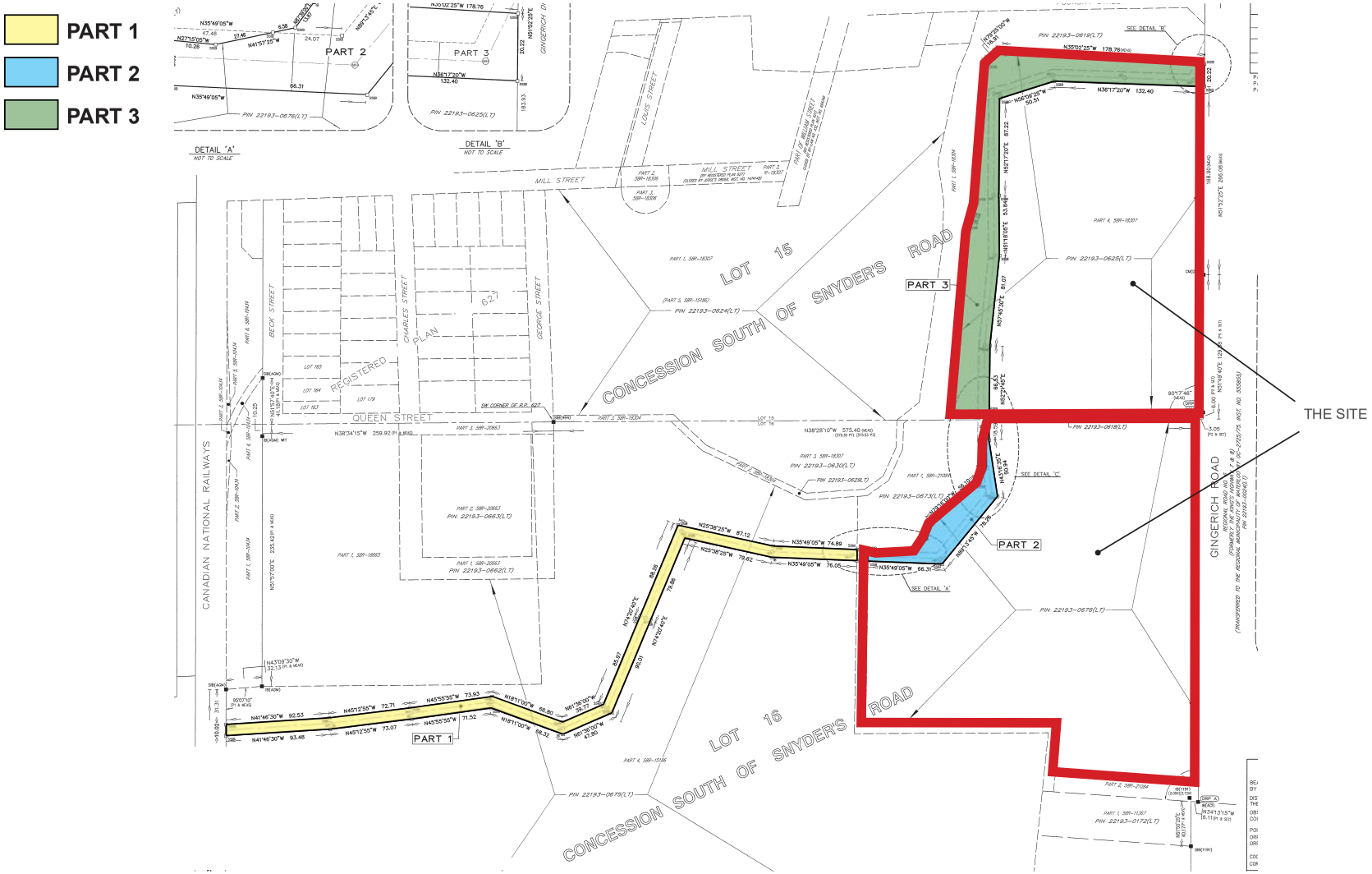
Details of the surrounding land uses are as follows (see **Figures 4 through 8**):

North: To the north of the Site opposite the Baden Creek is a vacant piece of land which is also owned by the Estate of Enid Schmitd. This land will be included in a separate application for a future Draft Plan of Subdivision.

East: Residential uses prevail to the east of the Site, beyond Foundry Street.

South: Directly to the south, there is a mix of commercial and industrial uses including a Baden Coffee Company, industrial transport services (The Erb Group and International Trucking Inc.), and OK Tire.

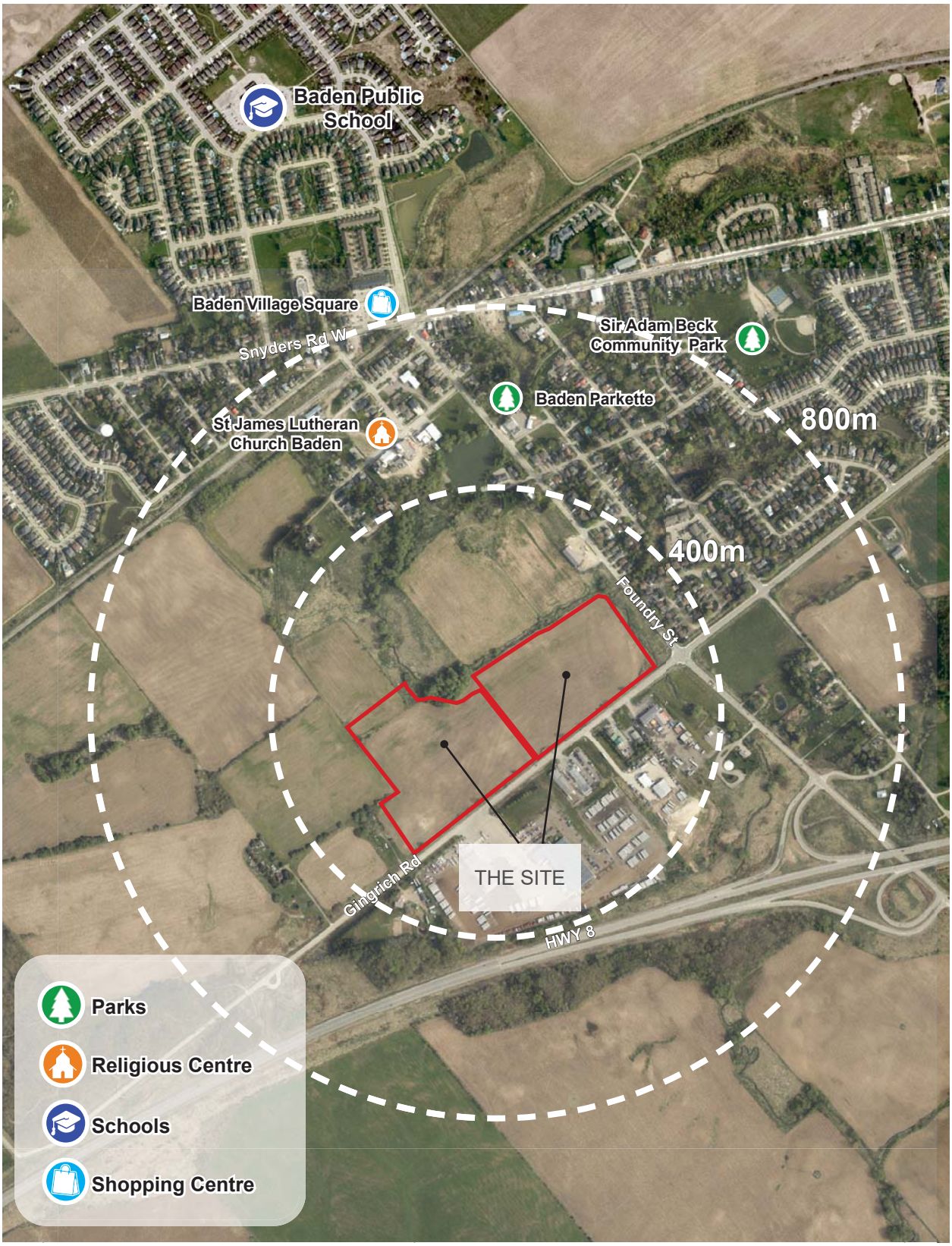
West: Along the west edge of the Site, the predominant use consists of agricultural lands, most of which are no longer in use. The closest establishment to the west is the Wilmot Recreation Complex, off Nafziger Road. There are pockets of naturalized vegetation throughout the agricultural fields.



Future Land Conveyance

Source: McKechnie Surveying (2026)

Figure 3



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Site Context

Source: Waterloo Region Interactive Mapping (2022)

Figure 4



North View
Source: Google Street View (2023)

Figure 5



East View
Source: Google Street View (2023)

Figure 6



South View
Source: Google Street View (2023)

Figure 7



West View
Source: Google Street View (2023)

Figure 8

3. Subject Application

The purpose of the proposed Zoning By-law Amendment ("Subject Application") is to facilitate a future application to develop an industrial plan of subdivision on the Site (the "Future Application").

No development of the land is proposed at this time. The Subject Application is largely an Official Plan conformity exercise. GSP Group is proposing a Zoning By-law Amendment ("ZBA") for the Site that would implement the Official Plan Review on June 6th, 2018, that changed the designation on the Site to remove the "Areas to be designated Prime Agricultural Land" (ROP Amendment No.1). Accordingly, the Subject Application would change the zoning from Z1 (Agriculture) to Z10 (Industrial) and Z11 (Open Space) in order to permit its future industrial development and delineate floodplain and natural heritage feature buffers. A noise/land use compatibility study is anticipated to be required at the time of a formal site plan submission.

Therefore, the requested amendment would improve alignment between the Site's zoning and land use designations in the Township's Official Plan.

4. Planning Policy and Overview

4.1 Provincial Planning Statement (2024)

The Provincial Planning Statement ("PPS") provides land use planning policy on matters of provincial significance. The 2020 PPS came into effect on May 1, 2020. The overriding vision of the PPS states that *"the long-term prosperity and social well-being of Ontarians depends on maintaining strong, sustainable and resilient communities for people of all ages, a clean and healthy environmental, and a strong and competitive economy".*

The following provides a summary of the key PPS policy considerations for the Site as well as justification for the Proposed Development in terms of these policies.

4.1.1 Employment

Section 2.8 of the PPS (Employment) states that "*planning authorities shall promote economic development and competitiveness by:*

> *a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
>
> *b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range*

of economic activities and ancillary uses, and take into account the needs of existing and future businesses;"

Response: The Proposed Application will support a Future Application to establish an industrial plan of subdivision. The subdivision will provide an opportunity to add to the mix of employment uses while broadening the economic base.

4.1.2 Cultural Heritage and Archaeology

Cultural heritage and archaeology guidelines are outlined in Section 4.6 of the PPS. This section aims to ensure that cultural heritage landscapes and heritage resources are maintained and not negatively impacted by development.

Response: To support the Subject Application, a Stage 3 Archeological Assessment Report was prepared. The report concluded that in the professional opinion of the archaeological licensee, the area has been sufficiently assessed and is free of further archaeological concern.

4.1.3 PPS Summary

Based on the applicable policies noted above, it is our opinion that the Subject Application is consistent with the PPS.

4.2 Regional Official Plan

The Regional Official Plan ("ROP") expresses a vision for the region, which is to be: *"an inclusive, thriving, and sustainable community committed to maintaining harmony between rural and urban areas and fostering opportunities for current and future generations"*.

On Map 1 of the Regional Official Plan (Regional Structure), the Site is identified as Township Urban Area. On Map 2 (Urban System), the is classified as Designated Greenfield Area, and on Map 3 (Employment Areas) it is identified as Employment Area. See **Figures 9**, **10 and 11.**

The following ROP policies are relevant to the Site and the Subject Application.

4.2.1 Urban System, Designated Greenfield Area, and Employment Area

Section 2.B outlines the policies for the Urban System. These policies apply to the Site as it is designated as Township Urban Area, one of seven key structural components in the Region's Urban System. As stated in Policy 2.E.1.1, lands included within the Township Urban Area designation are intended to serve "*as the focus for growth outside of the Urban Area*" until the year 2051.

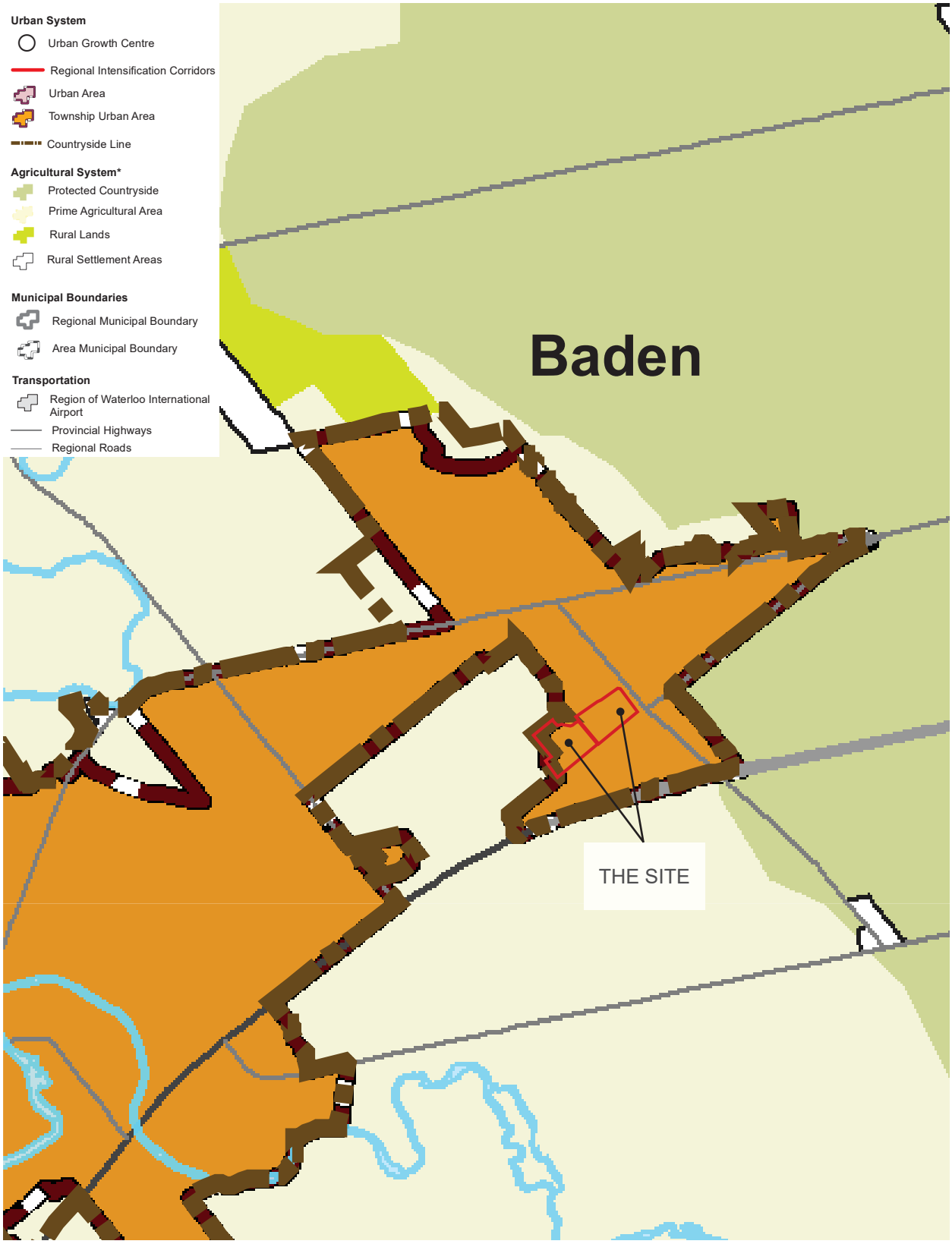
Since the Site is classified as a Designated Greenfield Area, it is required to accommodate a portion of the Region's population and employment growth to 2051 (Policy 2.G.1.1). The area is also designated as an Employment Area. As stated in Policy 2.H.1.1, the Employment Area designation is "*intended to identify and protect strategically located areas over the long-term for business and economic activities*".

Response: The Site is located within the Township Urban Area, is a Designated Greenfield Area, and is designated as an Employment Area. The Subject Application will rezone the Site to an employment zone in the Township's Zoning By-law, and Future Applications will facilitate the development of these lands to employment uses. The Future Applications will enable the lands to accommodate a share of the Region's forecasted employment growth to 2051, and enable business and economic activities on the Site, which conforms to the intent of the applicable Regional Official Plan policies.

4.2.2 Countryside Line

As shown on **Figure 12**, the Countryside Line abuts the Site. Section 2.C.1 of the ROP outlines Countryside Line policies. Policy 2.C.1.1 states that "*the Countryside Line represents the long-term urban growth boundary between the existing Urban Area and Township Urban Areas and the Countryside*".

Response: As noted, the Countryside Line abuts the Site. The Subject Application for rezoning and Future Application for an industrial subdivision respects the Countryside Line by directing urban employment uses to the Township Urban Area and permitting only agricultural and agricultural-related uses in the Protected Countryside.



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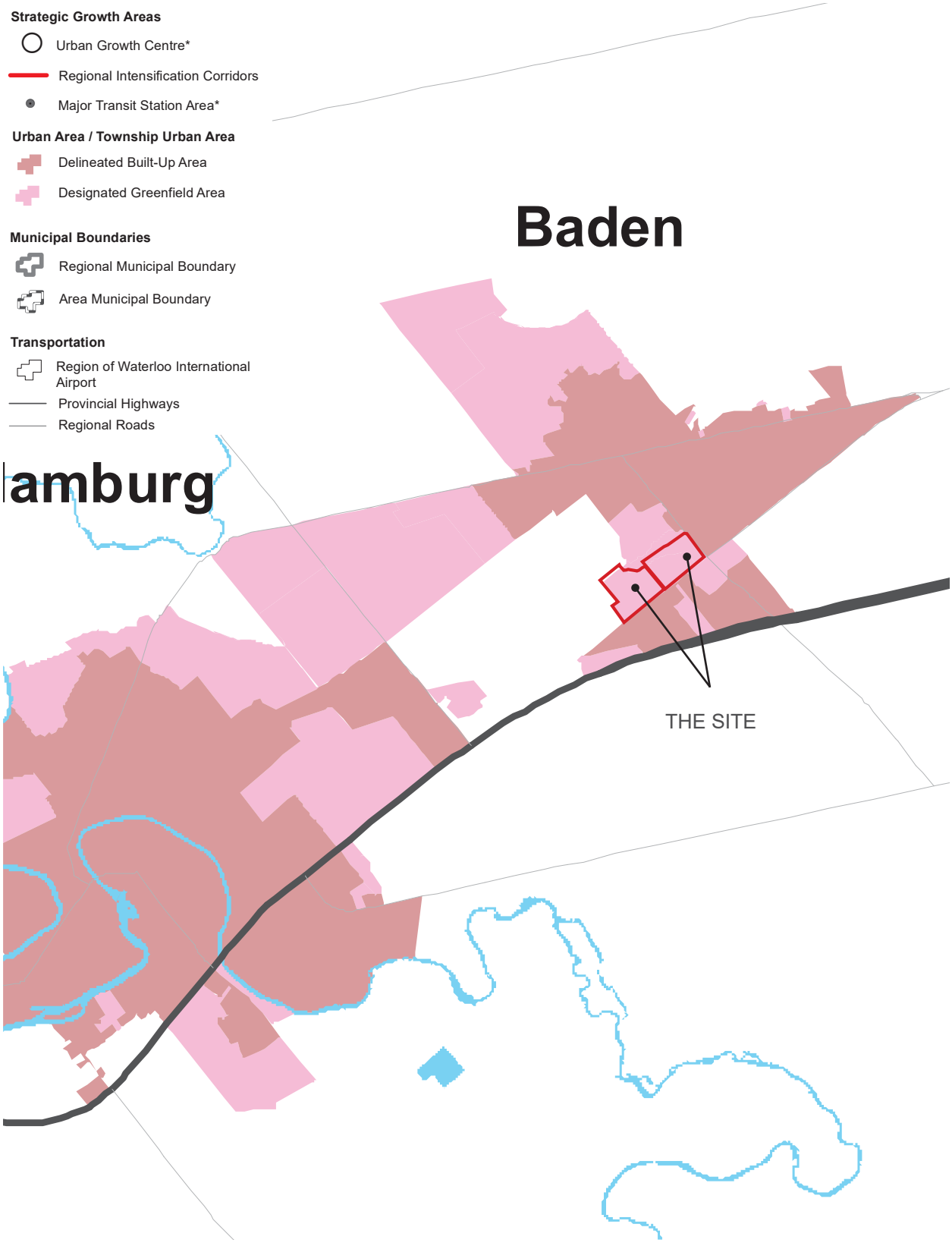
Map 1 - Regional Structure

Source:Region of Waterloo Official Plan (2024)

Figure 9

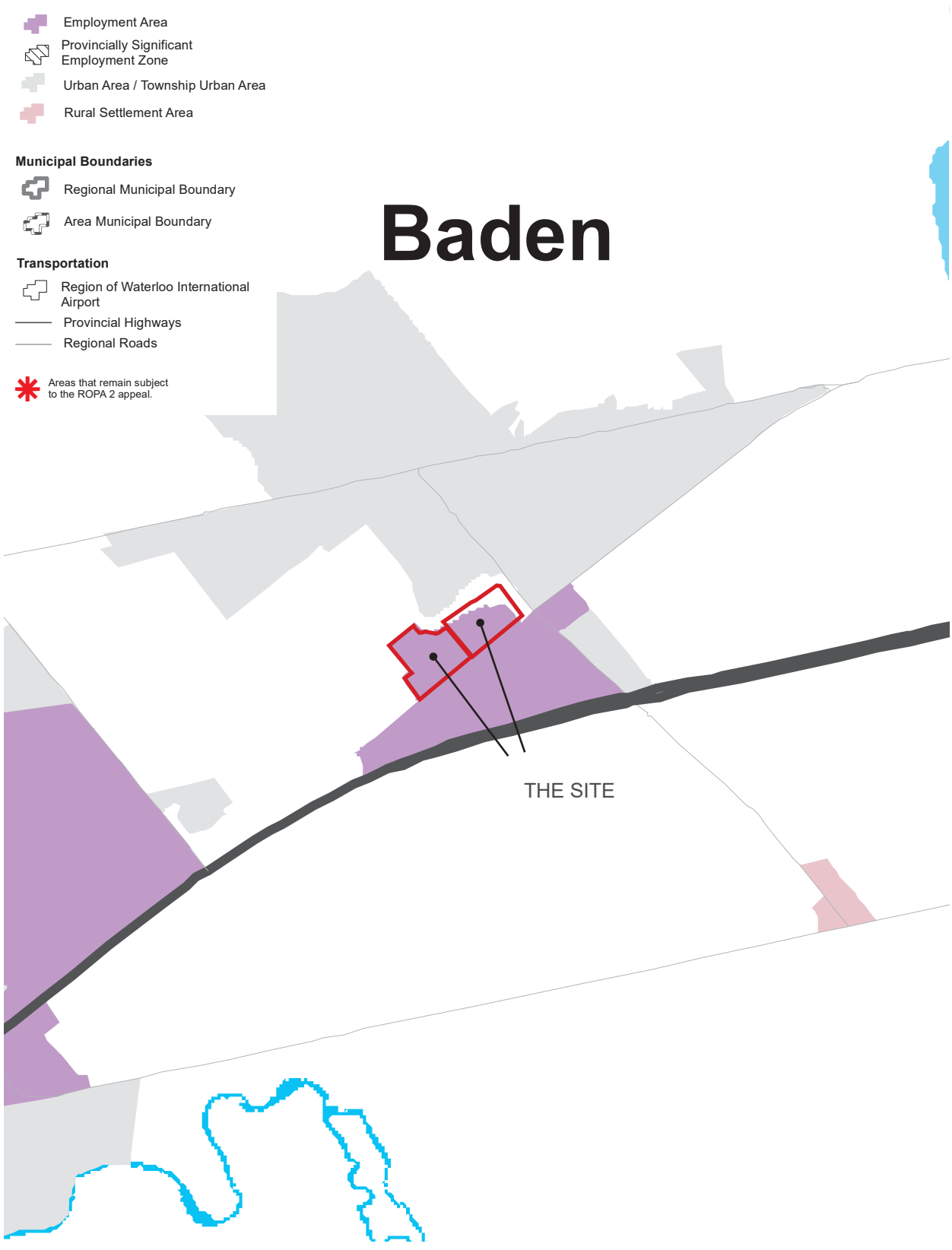


GSP group

Map 2 Urban Systems

Source:Region of Waterloo Official Plan (2024)

Figure 10



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Map 3 - Employment Areas

Source:ROPA 6 (2025)

Figure 11

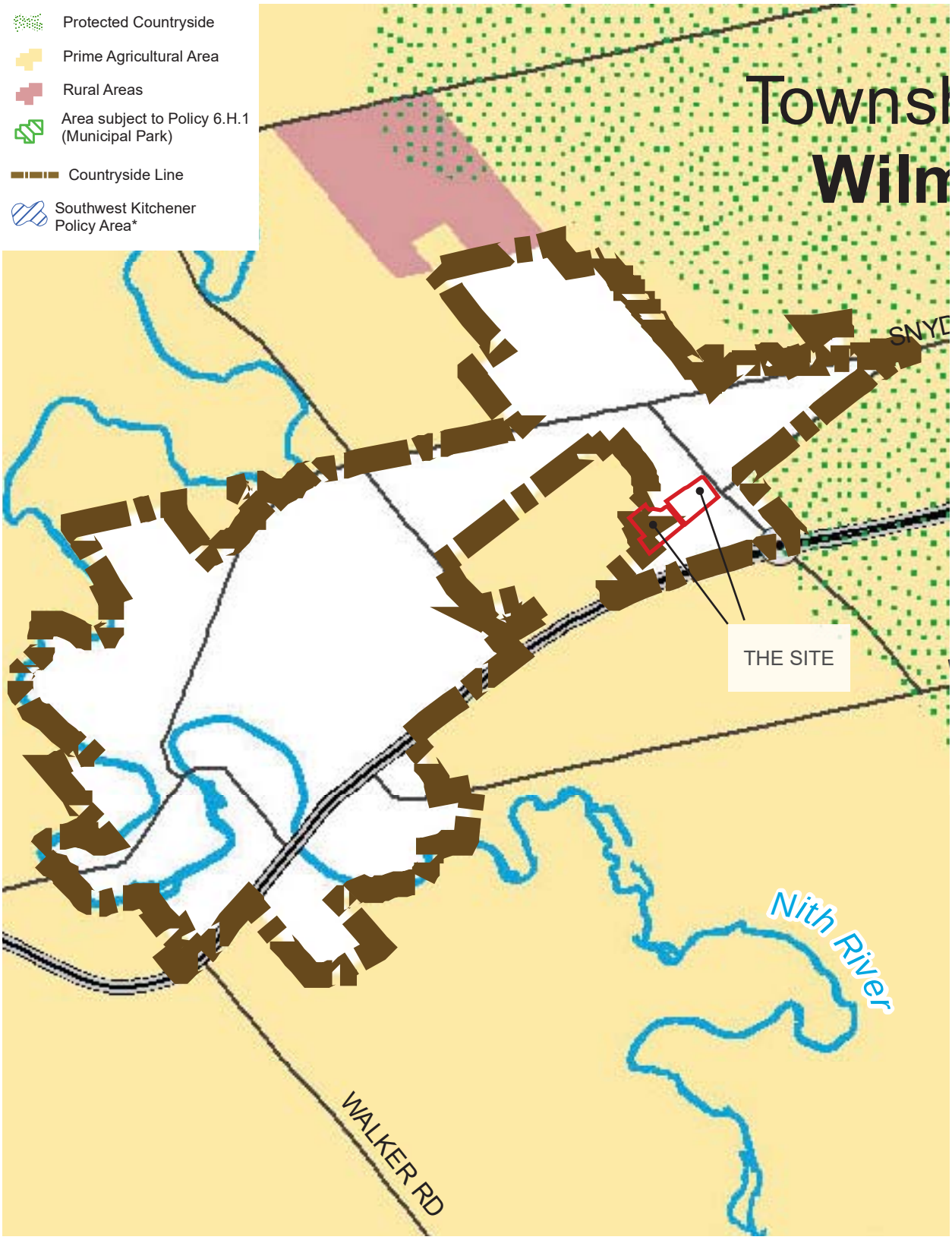

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Figure 12

Map 7 - Countryside

Source:Waterloo Region Official Plan (2024)

4.2.3 Land Use Compatibility

Policies 2.I.1.1 and 2.I.1.2 state that the Region and area municipalities will ensure major facilities and sensitive land uses are planned to first avoid, or if not possible, minimize and mitigate adverse effects from odour, noise, and contaminants. This protects public health, safety, and the long-term viability of major facilities per Provincial standards.

Where avoidance isn't possible, new sensitive land uses adjacent to existing or planned industrial areas will only be permitted if the following are demonstrated:

(a) "An identified need for the proposed use;
(b) No reasonable alternative locations exist;
(c) Adverse effects on the sensitive use are minimized and mitigated; and
(d) Potential impacts on the industrial uses are minimized and mitigated."

Response: Future uses on the subject lands will be required to demonstrate compliance with D-6/NPC compatibility criteria with respect to existing and planned sensitive land uses to the north and east in order to mitigate any future compatibility issues in advance of a future residential development to the north. A noise/land use compatibility study is anticipated at the time of a formal site plan submission.

4.2.4 ROP Summary

Based on the applicable policies noted above, it is our opinion that the Subject Application conforms to the ROP.

4.3 Township of Wilmot Official Plan

The Region of Waterloo approved updates to the Township of Wilmot Official Plan (the "TOP") which came into effect on April 19, 2019.

The Site is designated as General Industrial on Map 4.1– Baden Urban Area, Designated Greenfield Area on Map 2.2 and Prime Agricultural on Map 10 – The Countryside of the TOP (**Figures 13, 14 and 15**).

The Site is also noted on the following maps:

- Urban Areas – Map 2.1 of the TOP – Planned Township Structure (**Figure 16**)
- Flooding Hazards - Map 3 – Environmentally Constrained Lands (**Figure 17**)

4.3.1 Township Urban Area and Designated Greenfield Area

Policy 2.5.1.1 of the TOP states that *"the Baden and New Hamburg Urban Areas will be the primary focus of future residential, employment and commercial growth within the Township"* and 2.5.1.2 states *"Development within the Baden and New Hamburg Urban Areas will provide for a range of residential, commercial, employment, institutional, recreational and open space land uses."*

Section 2.5.1 sets out general policies for the Baden Urban Area, and references 2.5.1.3 for a list of general policies that all development applications must conform to. Development applications shall support the Planned Structure of the Plan, use municipal services, and protect the natural environment.

Response: The Site and Subject Application do not propose any development. The Subject Application will permit industrial land uses on the Site, which conforms to the range of uses and intent of the Wilmot OP designation applicable to it. The Site is within the Designated Greenfield Area and designated Employment, and the Subject Application will facilitate the process of accommodating more employment growth within the Township, conforming to the intent of the OP.

4.3.2 General Industrial Designation

The General Industrial designation advises that lands within this designation *"…shall be for industrial uses that require open storage of goods and materials such as manufacturing, processing, assembling, repairing, wholesaling, warehousing, trucking and storage, and associated retail and ancillary uses. (Policy 2.5.8.2)"* , shall not contain residential uses (Policy 2.5.8.3) and that permitted uses for the General Industrial designation shall be regulated through the Township Zoning By-law (Policy 2.5.8.5).

Response: The Future Application will establish a Draft Plan of Subdivision for industrial uses. The Subject Application is a Zoning By-law Amendment which will allow for industrial uses, which is in keeping with the industrial designation.

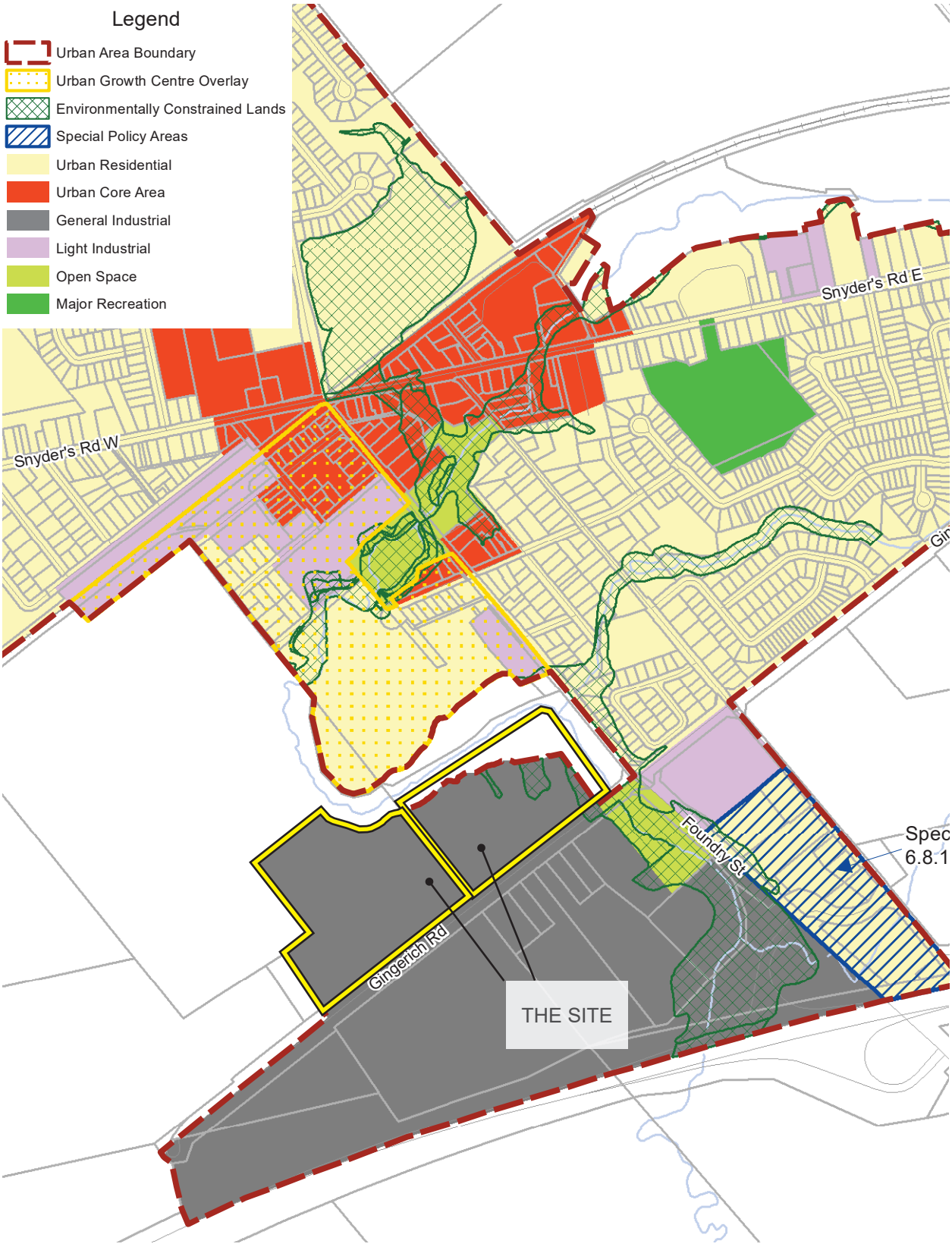
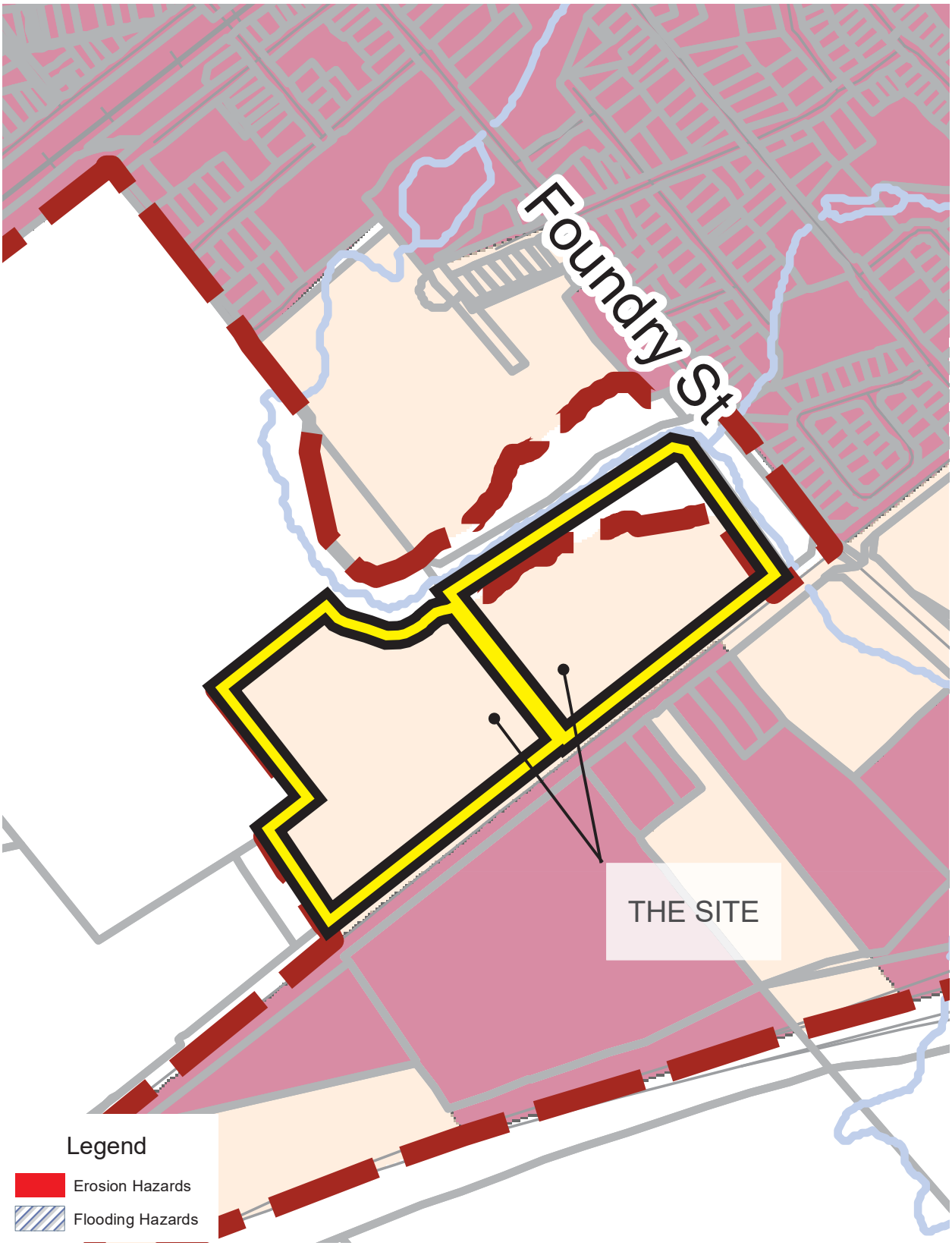


Figure 13

Map 4.1 - Baden Urban Area

Source:Township of Wilmont Map 4.1 (2024)



Map 2.2 - Designated Greenfield Areas

Source:Township of Wilmont Map 2.2 (2024)

Figure 14

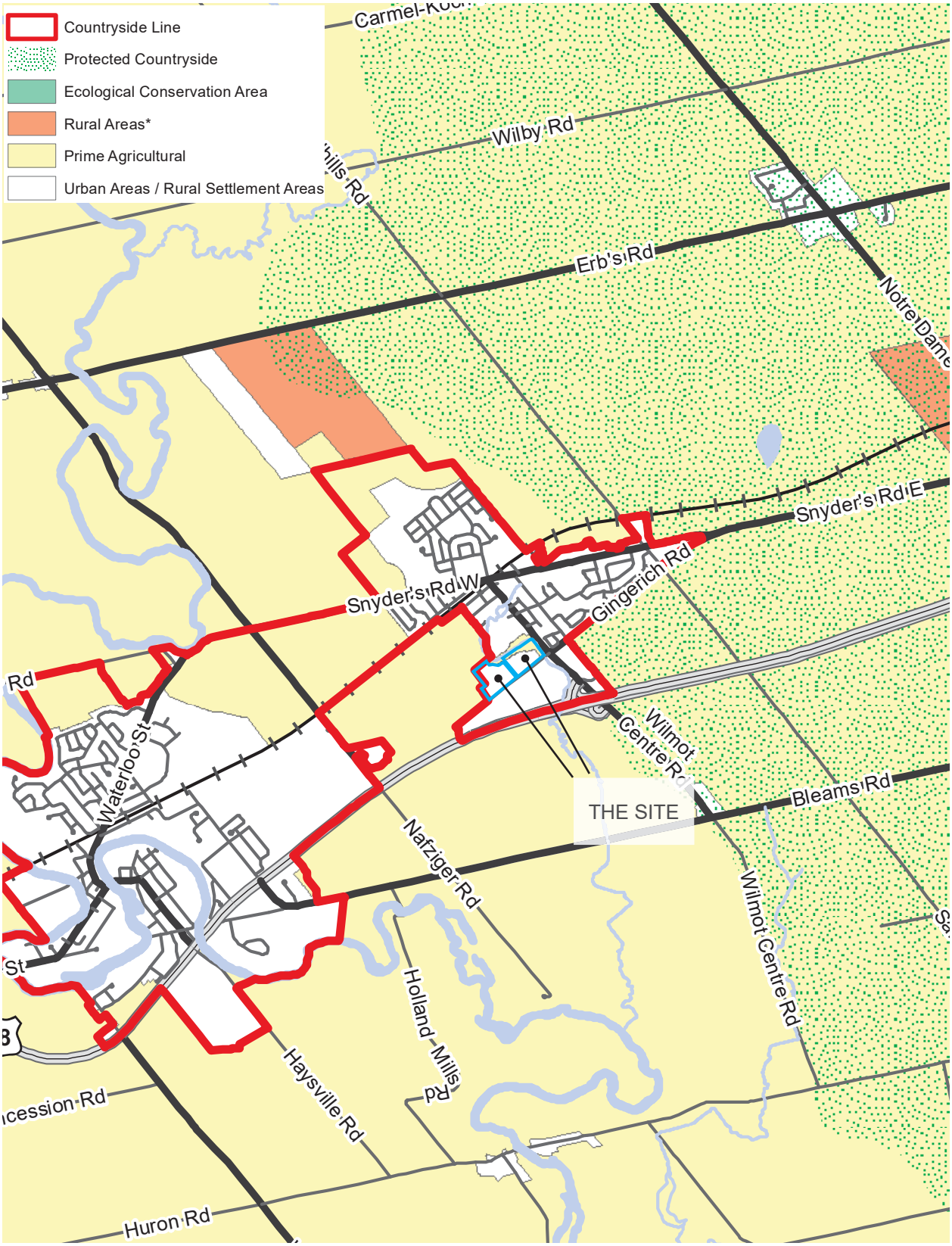


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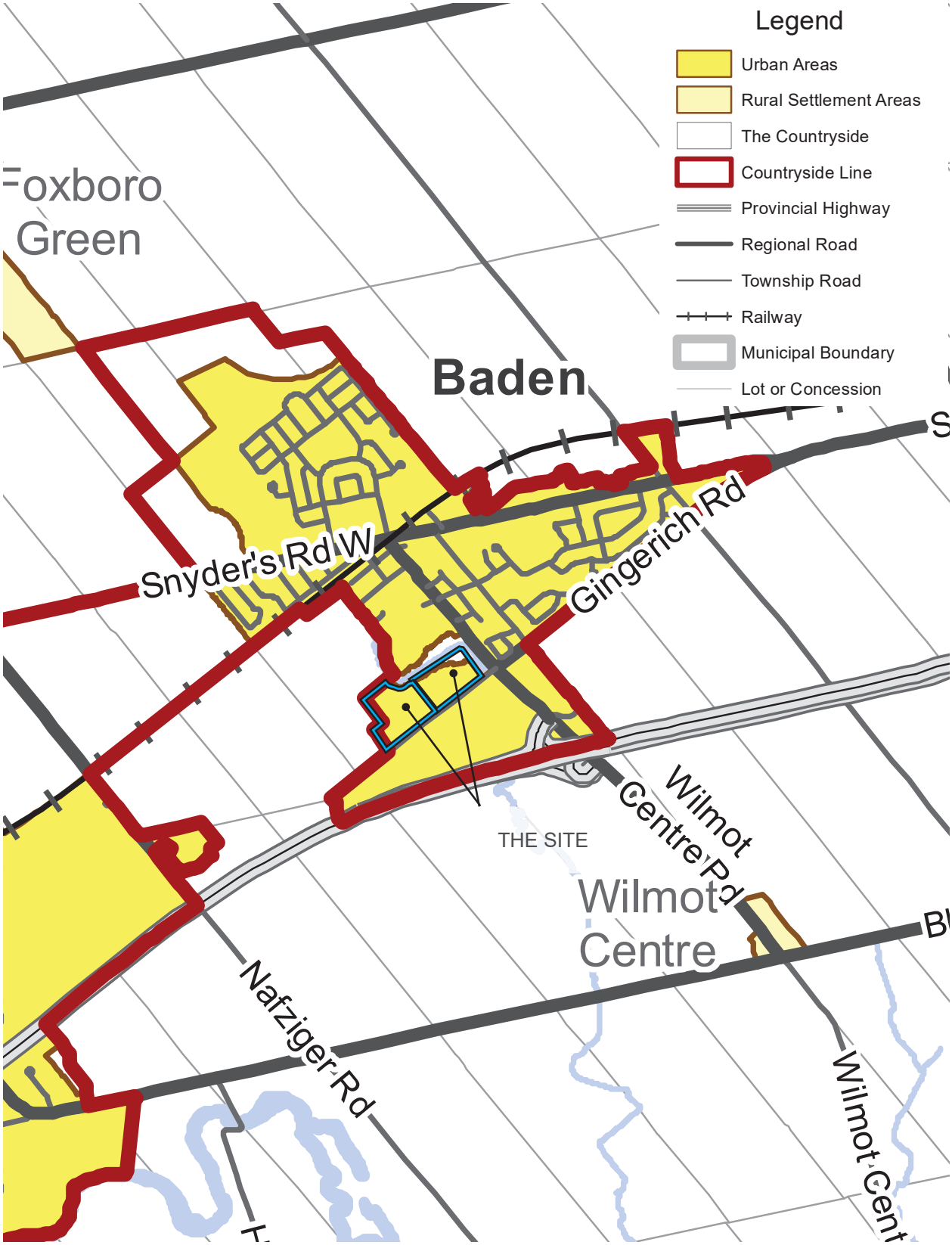
Figure 15

Map 10 - Countryside

Source:Township of Wilmont Official Plan (2024)



Map 2.1 - Planned Township Structure

Source:Township of Wilmont Map 2.1 (2024)

Figure 16



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Map 3 - Environmentally Constrained Lands

Source:Township of Wilmont Map 3 (2024)

Figure 17

4.3.3 Employment

Per Policy 2.7.1, the Township is to *"promote opportunities for economic development competitiveness by:*

a) making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;

b) ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan;

k) protecting employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations;"

Response: The Subject Application will facilitate a Future Application for an industrial subdivision which will establish new employment uses on a vacant piece of land, which is along a Regional road and within close proximity to the Highway 7/8 interchange, which is a main route for transporting goods in the Region and beyond. Although we do not know the exact details on the future business that will make use of the Future Application, it can be assumed that any future business would assist with meeting the goals for forecasted employment and growth within the Township, both short-term and long-term.

4.3.4 Land Use Compatibility

Policy 6.1.1 outlines the items that the Township must consider when reviewing applications involving land use compatibility. These factors to assess are listed below:

a) "the density, scale, height, massing and visual impact of surrounding buildings and the proposed development;

b) the preservation of the natural environment and cultural heritage resources;

c) the continued visibility and viability of adjacent land uses;

d) pedestrian, cyclists, and vehicular movement and linkages, and parking requirements;

e) landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of proposed and existing developments;

f) noise, dust, odours or vibrations generated by surrounding land uses as well as the proposed development; and,

g) traffic generated by surrounding land uses and the proposed development."

Response: Although there are no current plans for buildings on the Site, any future development would require a Site Plan which would undergo a thorough review of the proposal and compatibility in regard to scale, height massing and visual impact on surrounding properties. As with the above, landscape plans, zoning compliance (including parking requirements), signage and lighting will be reviewed at the Site Plan stage.

Additionally, future uses on the Site will be required to demonstrate compliance with D6/NPC compatibility criteria with respect to existing and planned sensitive land uses to the north and east. A noise/land use compatibility study is anticipated to be required at the time of a formal site plan submission.

4.3.5 Environmentally Constrained Lands

A portion of the Site is identified as being "Environmentally Constrained Lands" which is associated with Baden Creek.

Policy 8.2.3 states that lands identified as being *"…within the Environmentally Constrained Lands designation will be zoned to prohibit new buildings or structures."* The policy also notes that appropriate setbacks must also be established from these sensitive lands.

Response: The Subject Application respects the recommended buffer/setbacks identified within the Environmental Impact Study in delineating the extent of Industrial Zoning; applying Open Space zoning to the lands subject to recommended buffers. The Open Space zone precludes the use of new buildings or structures.

4.3.6 TOP Summary

Based on the applicable policies noted above, it is our opinion that the Subject Application conforms to the TOP.

4.2 Township of Wilmot Zoning By-law

The Site is currently zoned Z1 (Agriculture) as shown on **Figure 18**. A Zoning By-law Amendment is requested to rezone the Site to a Z10 (Industrial) Zone in order to facilitate the development of future industrial uses. Future uses on the Site will be required to demonstrate compliance with D6/NPC compatibility criteria with respect to existing and planned sensitive land uses to the north and east, in order to mitigate any future compatibility issues in advance of potential future residential development to the north. Portions of the Site are located within the floodplain and the buffers to natural heritage features recommended in the Environmental Impact Study (**Section 5.5** of this Report) are proposed be zoned Z11 (Open Space). **Figure 19** shows the proposed Zoning for the Site. The Draft Zoning By-law Amendment can be found in **Appendix A.**

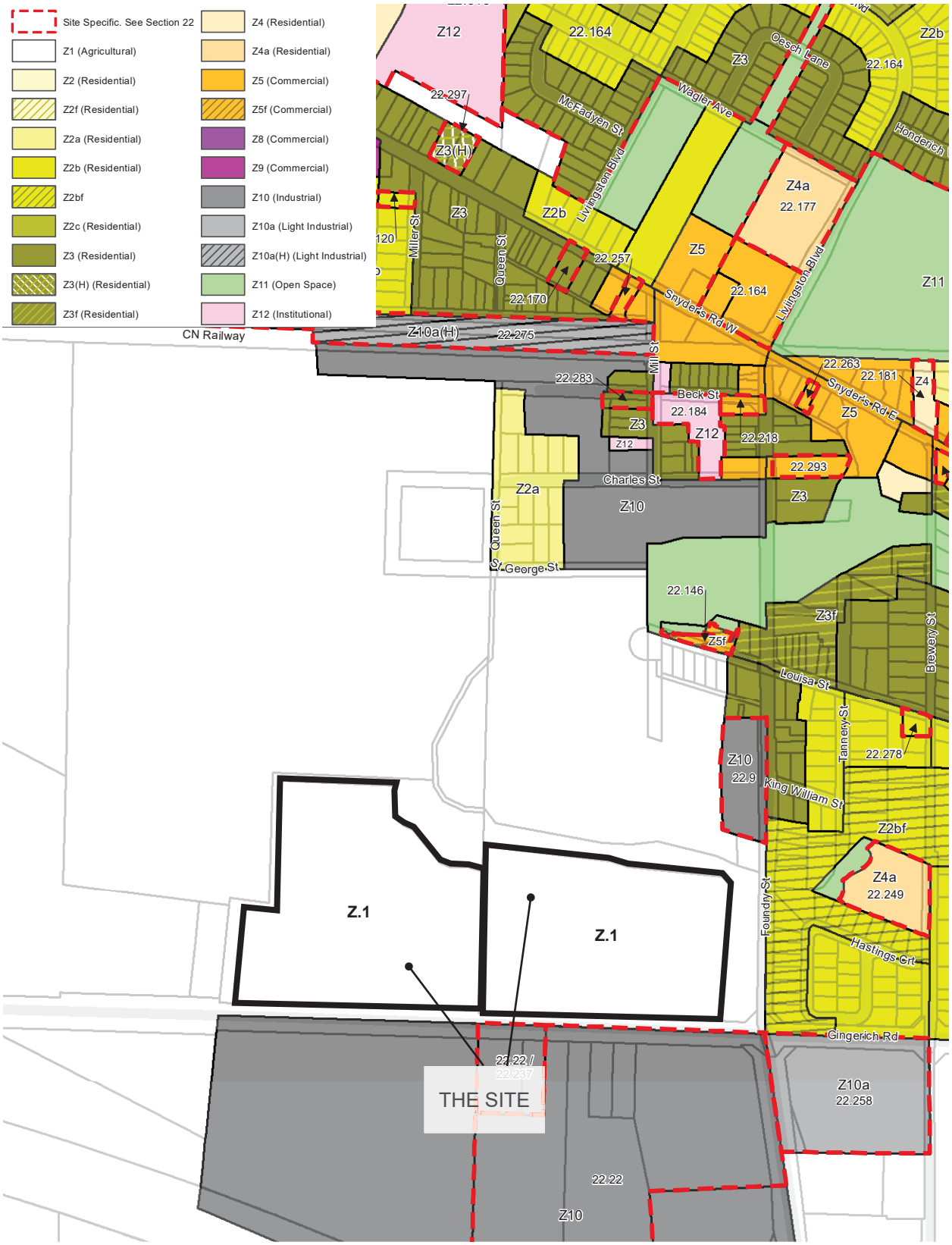

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Figure
Existing Zoning Map
Source:Township of Wilmont Zoning By-Law (2024)
18



Area to be changed to Z10 **Industrial with a site-specific provisions 22.315**

Area to be changed to Z11 Open Space

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Proposed Zoning By-Law Amendment Area

Source:Township of Wilmont Zoning By-Law (2024)

Figure 19

5. Overview of Supporting Reports and Studies

The following sections provide summaries of the reports required for this submission. These summaries are intended to offer an overview of the key findings, recommendations, and conclusions. For complete details, methodologies, and supporting data, please refer to the full reports referenced in each section.

5.1 Functional Servicing and Stormwater Management Report

A comprehensive Functional Servicing Report (the "FSR") dated April 22, 2026, was prepared by WalterFedy for the Site in support of the Subject Application.

The FSR assessed the potential opportunities and limitations associated with servicing and grading on the Site and examined the specific requirements put forth by relevant reviewing agencies and demonstrated the property's functional viability.

The following points from the FSR summarize the components of the design:

- The proposed Site can be serviced via a 200-mm-diameter sewer sloped at 0.5%. The new trunk sewer provides stubs for both industrial parcels.
- The overall water demands for the Site can be serviced via 300-mm-diameter water services. Private hydrants will be required.
- Pre-development peak flow rates will be met through the use of underground storage. Water quality control will be met through the use of an OGS unit in a treatment train approach with bioswales or other water storage features.
- Major overland flow from the Site will be directed towards Baden Creek.
- Perimeter silt fence, silt fence at the base of all stockpiles, silt sacs in catchbasins, and construction entrance mud mats can provide erosion and sediment control.

In summary, the FSR outlines the proposed site grading and municipal servicing design for the Subject Application and demonstrates that the Future Application is feasible and can be designed and constructed in accordance with municipal standards.

5.2 Geotechnical Report

A Geotechnical Report dated April 2022, was prepared by Pinchin Ltd. to provide geotechnical design recommendations for the for the Subject Application in support of the Zoning By-Law Amendment application.

The report assesses the potential opportunities and limitations associated with servicing and grading on the Site. It also examines the specific requirements put forth by relevant reviewing agencies and demonstrates the property's functional viability.

In summary, the Geotechnical Report outlines soil and groundwater conditions located on Site, open cut excavations, anticipated groundwater management, foundation design recommendations and more for proposed industrial development.

5.3 Stage 3 Archaeological Assessment

A Stage 3 Archaeological Assessment dated September 2024, was prepared by Detritus for the Site in support of the Subject Application.

The purpose of the Stage 3 Archaeological Assessment was for an investigation conducted in advance of the Baden sanitary sewer replacement in the community of Baden. A previous Stage 1-2 assessment (not related to the Baden sanitary sewer replacement) was conducted on the Site. This investigation resulted in the documentation of one pre-contact Indigenous site and 9 pre-contact Indigenous findspots. Detritus conducted a Stage 2 Archaeological Assessment for the current Study Area between 2021 and 2023, where Baden Creek transected the southeastern portion of the Study Area and was determined to retain no archaeological potential.

In summary, given the results of the Stage 3 assessment, no test unit yielded more than five lithic artifacts, therefore the Site does not meet any of the criteria for a Stage 4 Mitigation of Developmental Impacts and is not recommended for a Stage 4 Mitigation of Developmental Impacts.

5.5 Environmental Impact Study

An Environmental Impact Study dated December 2025, was prepared by Natural Resource Solutions Inc. (NRSI) for the Site in support of the Zoning By-Law Amendment application.

The EIS summarizes background information on natural heritage features, as well as results of field surveys completed within the Site and adjacent study area portions of the Schmidt Estate lands. The information collected was used to define natural features as development constraints based on significance and sensitivity of the features, to inform the delineation of development constraints on the Site.

The following points from the EIS summarize the findings:

- Watercourse buffers from Baden Creek (15m) and the Huehn Award Drain (30m) are recommended to be setback from aquatic habitat.
- Ecological buffers (10m) have been recommended to preserve and setback the development from the Baden Creek watercourse as well as the adjacent woodland features to avoid direct impacts from all features.
- Green spaces and other landscaped areas are recommended to be incorporated into future site plans for the industrial lands to mitigate loss of SCC Barn Swallow foraging habitat.
- Site grading and future Site Plan-stage stormwater management planning should account for existing stormwater flow conveyance to properly manage these flows while mitigating sedimentation and erosion effects on the downstream features/areas.

Based on the results of the EIS, negative impacts to the existing natural features and ecological functions associated with the proposed short-term site preparation of the Site are not anticipated, subject to implementation of the recommended measures found within the EIS. Future development of the Site for industrial uses is also not anticipated to negatively impact the adjacent natural features and ecological functions, subject to implementation of the mitigation measures noted within the EIS, and in conjunction with ecological restoration.

5.5 Hydrogeological Assessment

Pinchin was retained to provide a Hydrogeological Assessment for the Site. A summary of the key findings are as follows:

This Site is located within the Baden Creek Subwatershed, part of the Nith River Watershed, and is under the jurisdiction of the Grand River Conservation Authority (GRCA). There are no wetlands on the Site itself. The nearest wetland is approximately 170 meters to the south, and the larger Baden Southwest Wetland Complex is located about 460 meters to the southwest.

Geological data indicates the Site is in an area of clay to silt-textured soil. In portions of the Site, there are also deposits of sand and gravel. Modern deposits of clay, silt, sand, and gravel are found along nearby Baden Creek. The deep underlying bedrock consists of dolostone, shale, and evaporites.

The soil generally consists of topsoil over a thick layer of silty clay to clayey silt, which continues down to the maximum investigated depth of 6.7 meters. Within this, there are thinner layers of silt and sand.

Groundwater levels are relatively shallow, measured from 0.5 meters to 4.5 meters below the ground surface. The water flows from the south toward the north, draining into Baden Creek. The soil allows water to pass through it very slowly, with a geometric mean flow rate of approximately 1.6×10^{-6} cm/sec.

Due to these shallow water levels and the slow-draining, clay-rich soils, the ground has a limited ability to absorb large volumes of water without causing the water table to rise or create surface ponding. Stormwater management will need to direct runoff to low-lying areas and Baden Creek. It is recommended to use imported fill to raise the ground level in low areas to keep foundations and pits separated from the high groundwater table.

Testing of the groundwater showed that levels of total phosphorus and several metals were higher than the Provincial Water Quality Objectives. In one location, the level of total suspended solids also exceeded the Region of Waterloo's sanitary sewer discharge criteria. Therefore, any water discharged from the Site into Baden Creek would need to be filtered and treated first.

6. Public Consultation Considerations

A statutory public meeting will be required as part of the Zoning By-law Amendment application to facilitate this Proposed Development.

GSP Group and the Estate of Enid Schmidt are agreeable to the scheduling of a Neighbourhood Information Meeting or open house, if required by the Township, as well as any additional informal public meeting(s), open house meeting(s) and/or neighborhood meetings required by the Township.

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 Township and Regional staff for their review and consideration prior to the preparation of a final staff report and recommendation on the Zoning By-law Amendment.

7. Summary and Conclusion

The Estate is requesting a Zoning By-law Amendment, which will facilitate a Future Application for an industrial plan of subdivision in the Township of Wilmot. For the following reasons, we conclude that the proposed Zoning By-law Amendment application is justified:

- The requested amendment would facilitate a Future Application for an industrial plan of subdivision.
- The requested amendment would better align the Site's zoning with its planned land uses as set out in the ROP and TOP.
- The Future Application would increase the Township's supply of developable sites for employment uses.
- The Site is proposed to be zoned Industrial and is located within a Settlement Area, which is the focus of growth of development in the PPS. The change in Zoning is therefore consistent with the PPS.
- The Subject Application works towards making efficient use of underutilized employment land which is consistent with Section 2.7 of the TOP.
- The Subject Application is the first step in ensuring development within the settlement area; with the Future Application to follow.
- Natural heritage features (buffers) of the Site will be conserved in accordance with the recommendations of an Environmental Impact Study.
- Appropriate land use compatibility measures have been incorporated in the proposed Zoning of the Site.

Overall, this Planning Justification Report concludes that the proposed Zoning By-law Amendment is appropriate and represents good planning for the following reasons:

- It is consistent with the policies of the Provincial Planning Statement (2024);
- It conforms to the policies of the Region of Waterloo Official Plan;
- It conforms to the policies of the Township of Wilmot Official Plan; and,
- It is in line with the general intent and purpose of the Township of Wilmot Zoning By-law.

Based on the foregoing, it is our opinion that the Subject Application is appropriate, represents good planning, and should be approved.

Yours truly,

GSP Group Inc.

APPENDIX 'A'

Draft Zoning By-Law Amendment

THE CORPORATION OF THE TOWNSHIP OF WILMOT

BY-LAW NO. 2025-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 said Township of Wilmot.

NOW THEREFORE the Council of the Corporation of the Township of Wilmot hereby enacts as follows:

1. Notwithstanding the provisions of By-law 83-38, as amended, the lands described on Schedule "A" and illustrated on Schedule "B" attached to and forming part of this By-law, are hereby removed from Zone 1 (Agricultural) and placed within Zone 10 (Industrial) and Zone 11 (Open Space).
2. Notwithstanding the provisions of By-law 83-38, as amended the map forming Part 1 of Schedule "A" to By-law 83-38 shall be amended as necessary to identify the zones established by this By-law and illustrated on schedule "B" attached and forming part of this By-law.
3. Notwithstanding the provisions of By-law 83-38, as amended the following shall be added as Section 22.3XX.

   Notwithstanding any other provisions of this By-law, the lands described as Part of Lot 16 South of Snyder's Road, being Part of Part 4 Plan 58R-15186 (being north and east of Parts 1 and 2 Plan 58R-21084); and Part of Lot 15 South of Snyder's Road, being Part 4 Plan 58R-18307 save and except Part 3 Plan 58R-18584 and and identified on the map forming Part 2a of Schedule 'A', subject to the following provisions:

   (a) Future uses on the subject lands will be required to demonstrate compliance with D-6/NPC compatibility criteria with respect to existing and planned sensitive land uses to the north and east.

   Additionally, the following uses shall be prohibited:

   i. Sawmill;

   ii. Manufacturing, involving uses which would include:

   a. Open processes;

   b. Outdoor storage of raw/finished products;

   c. Nighttime operations; and/or,

   d. Frequent heavy truck movements during all time periods.

4. Except as amended by the preceding regulations, the lands described on Schedule "A" attached to and forming part of this by-law and shown on Schedule "B" attached to and forming part of this by-law, shall be subject to all other applicable regulations as set down in By-law No. 83-38, as amended.

5. This by-law shall come into effect on the final passing thereof by the Council of The Corporation of the Township of Wilmot subject to compliance with the provisions of The Planning Act, R.S.O., 1990 and amendments thereto.

READ a first and second time on the day of _____ , 2025.

_____
Mayor

_____
Clerk

SCHEDULE "A"

ALL AND SINGULAR that certain parcel or tract of land and premises situate, lying and being in the Township of Wilmot, in the Regional Municipality of Waterloo and Province of Ontario being composed of Part of Lot 16 South of Snyder's Road, being Part of Part 4 Plan 58R-15186 (being north and east of Parts 1 and 2 Plan 58R-21084); and Part of Lot 15 South of Snyder's Road, being Part 4 Plan 58R-18307 save and except Part 3 Plan 58R-18584. This is Schedule “A” to By-law No. 2025-XX PASSED this day of _____ , 2025.

_____
Mayor

_____
Clerk

SCHEDULE "B"

PART OF LOT 16 SOUTH OF SNYDER'S ROAD, BEING PART OF PART 4 PLAN 58R-15186 (BEING NORTH AND EAST OF PARTS 1 AND 2 PLAN 58R-21084); AND PART OF LOT 15 SOUTH OF SNYDER'S ROAD, BEING PART 4 PLAN 58R-18307 SAVE AND EXCEPT PART 3 PLAN 58R-18584 TOWNSHIP OF WILMOT



This is Schedule “B” to By-law No. 2025-XX PASSED this day of _____, 2025.

_____
Mayor

_____
Clerk