PLANNING JUSTIFICATION REPORT

PREPARED FOR:

Official Plan and Zoning By-Law Amendment
Schnurr Homebuilders Inc.
67 Beck Street, Baden ON

File no. 21294B

REVISED March 2026

Your Vision

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Contents

1.0 INTRODUCTION 3

1.1 Complete Applications 4

2.0 SITE DESCRIPTION AND CONTEXT 5

2.1 Existing Planning Controls 8

3.0 PROPOSED DEVELOPMENT 9

3.2 Official Plan Amendment 11

3.3 Zoning By-law Amendment 11

4.0 SUPPORTING STUDIES 12

4.1 Functional Servicing and Stormwater Management Report 12

4.2 Transportation Impact Assessment and Parking Study 13

4.3 Archaeological Assessment 14

4.4 Noise and Vibration Study 15

5.0 POLICY ANALYSIS 17

5.1 Provincial Planning Statement, 2024 17

5.2 Region of Waterloo Official Plan 21

5.3 Township of Wilmot Official Plan 24

5.4 Township of Wilmot Zoning By-law No. 83-38 29

6.0 CONCLUSION 33

Appendices

Appendix A: Proposed Zoning By-law Amendment 33

Figures

After page

Figure 1: Location Map 8

Figure 2: Context Map 8

Figure 3: Proposed Development Concept 11

Figure 4: Region of Waterloo Official Plan Map 2 22

Figure 5: Region of Waterloo Official Plan Map 3 22

Figure 6: Wilmot Township Official Plan Map 2.1 23

Figure 7: Wilmot Township Official Plan Map 4.1 23

Figure 8: Township of Wilmot Zoning By-law 26

1.0 INTRODUCTION

MHBC Planning Ltd. has been retained by Schnurr Homebuilders Inc. to provide a planning opinion in support of the development of their lands located at 67 Beck Street between Beck and Charles Streets, west of Mill Street in the Town of Baden, Township of Wilmot (herein referred to as 'the site'). The site includes a former Township of Wilmot right-of-way located immediately to the east of 67 Beck Street, which was acquired by Schnurr Homebuilders Inc. in March 2026. This Report has been prepared in support of applications for an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA).

As illustrated in **Figure 1**, 67 Beck Street is located within the Town of Baden, west of Foundry Street, south of the railway and proximate to the western boundary of Baden, whereas the former alleyway is located immediately to the west of 67 Beck Street. The site is approximately 0.73 hectares (1.8 acres) in size, with 67 Beck Street formerly used as a feed mill. All former buildings and grain elevators have since been demolished. The former alleyway was never developed and remains as a grassed area. A mix of industrial, commercial, residential and institutional uses characterize the immediate area surrounding the site.

Applications to amend the Township of Wilmot Official Plan and Township of Wilmot Zoning By-law 83-38 were originally submitted on April 25, 2025 for 67 Beck Street, which included a Planning Justification Report prepared by MHBC, dated April 2025. The applications were held in abeyance shortly after submission pending the outcome of the disposal of the alleyway by the Township under the requirements of the *Municipal Act*. As the successful proponent in the bid process, Schnurr Homebuilders Inc. has since acquired the additional parcel and in turn revised the development proposal to include the former alleyway and to address preliminary staff comments regarding the layout of the proposed development.

The revised proposal involves a residential redevelopment containing 66 stacked townhouse units in three buildings. Two residential buildings are proposed fronting Beck Street, with the third building proposed abutting Charles Street. New driveway accesses from Beck Street and Charles Street will serve residents of the new development, with parking being provided internal to the proposed development in proximity to the units. As part of the proposal, Beck Street will be reconstructed to an urban standard from Mill Street, extended across a portion the site frontage, and terminate in a cul-de-sac. Upon extension of Beck Street to the western limit of Baden, the temporary cul-de-sac will be removed.

The site is currently designated Light Industrial and within the Urban Growth Centre in the Township of Wilmot Official Plan, whereas 67 Beck Street is zoned Industrial (Z10) in the Township of Wilmot Zoning By-law and the former alleyway is zoned Residential (Z3). Through amendments to the Region of Waterloo Official Plan in 2022, the site was excluded from the Regional Employment Area designation in the Regional Official Plan.

Implementation of the proposed development requires approval of an Official Plan Amendment and Zoning By-law Amendment to establish residential development permissions on the site. As such, this

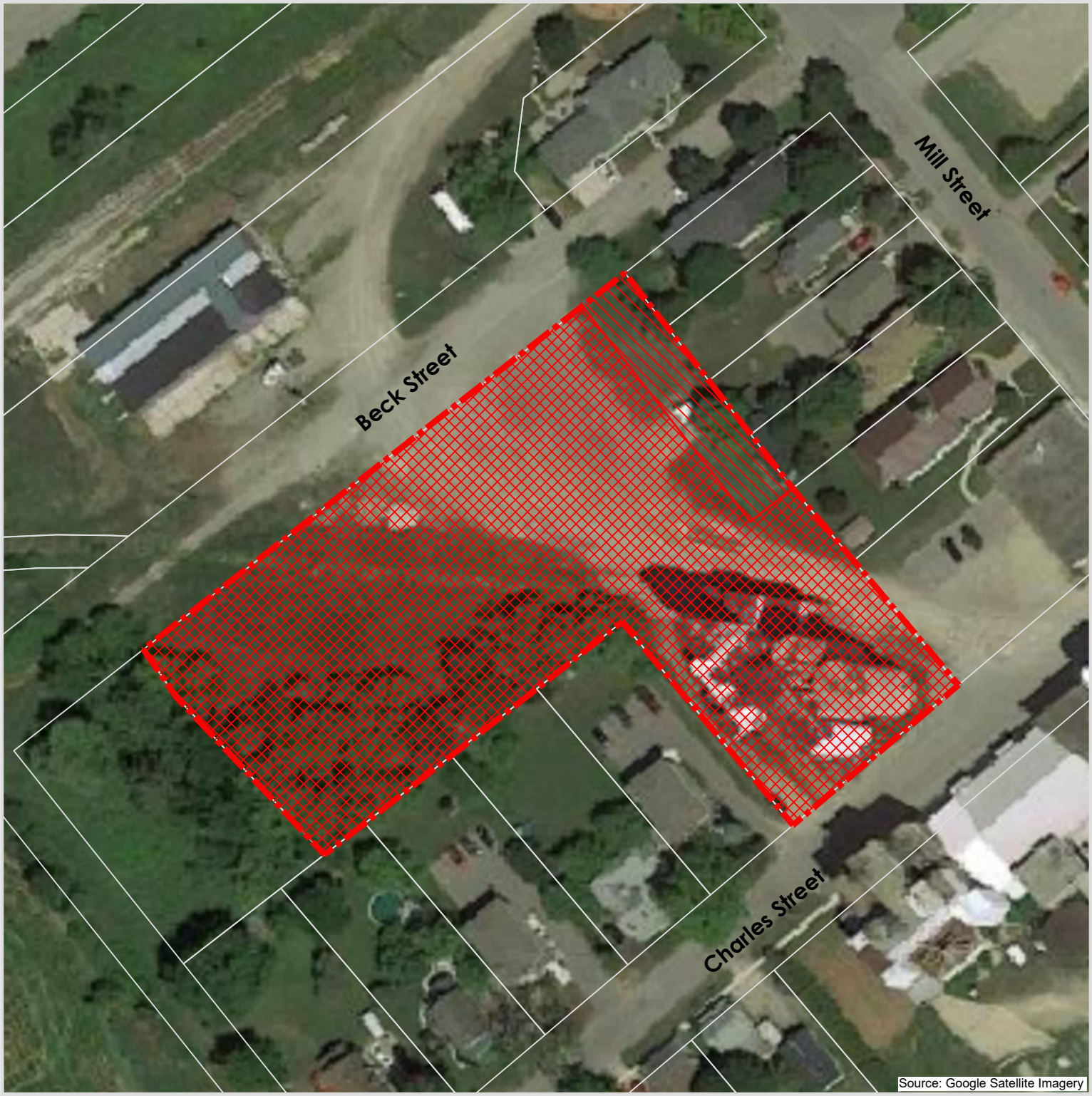

Figure 1

Location Map

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

LEGEND

- Site
- 67 Beck Street
- Former Alley

DATE:	January 2026
SCALE:	1:1,000
FILE:	21294B
DRAWN:	CAC/LC

north

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revised Planning Justification Report has been prepared for re-submission to the Township of Wilmot in support of the OPA and ZBA applications and includes the following:

- A general description of the site, surrounding uses and existing conditions to provide an understanding of the locational context;
- A description of the proposed development and implementing Official Plan and Zoning By-law Amendments;
- A review and summary of other technical reports prepared in support of the planning applications; and,
- A review and assessment of the existing Provincial, Regional, and Township policy frameworks in relation to the proposed development.

1.1 Complete Applications

The required pre-consultation meeting with Township Staff and review agencies for this proposal was held on January 23, 2023. The following plans and reports were identified as required in conjunction with the completed applications for Official Plan and Zoning By-law Amendment and related fees to form a complete application at time of submission:

- Planning Justification Report
- Functional Servicing Report
- Preliminary Servicing Plans
- Stormwater Management Brief
- Traffic Impact Brief
- Archaeological Assessment
- Environmental/Stationary Noise Study
- Railway Vibration Study
- Parking Justification Report

The Functional Servicing Report and Preliminary Servicing Plans, Stormwater Management Brief, Traffic Impact Brief and Noise and Vibration Study Report were included in a Technical Study Pre-Submission to the Township in October 2023. These reports and plans were subsequently circulated, reviewed and revised to respond to the Staff comments, and formed the basis of the Official Plan and Zoning By-law Amendment applications submitted in April 2025. Preliminary comments on these technical reports were also received following the submission of the applications. Revised technical reports submitted with this revised Planning Justification Report take into consideration the comments received.

The Archaeological Assessment for 67 Beck Street was submitted and reviewed by the Ministry of Tourism, Culture and Sport, with the Letter of Acknowledgement being issued and included in the April 2025 application submission. An Archaeological Assessment is currently being undertaken for the former alleyway, with completion and subsequent submission to the Ministry for Acknowledgement anticipated in Summer 2026. In addition to these studies, a Record of Site Condition has been issued for 67 Beck Street given the site's previous industrial use. Land use compatibility policies of both provincial and municipal planning policy frameworks are addressed herein and through the Noise and Vibration Feasibility Study.

2.0 SITE DESCRIPTION AND CONTEXT

The site is located within the Town of Baden, west of Mill Street and bounded by both Beck and Charles Streets. Lands comprising the site are legally described as follows:

- 67 Beck Street: Lots 165-168, 173, 174 and Park Lot 169, Plan 627 and Lot 5, Plan 633, Being Part 1 on 58R-18634, Part of Lot 15, German Block South of Snyders Road, Geographic Township of Wilmot, County of Waterloo, now in the Town of Baden, Regional Municipality of Waterloo; and
- Former alleyway: Alley S of Beck Street Plan 633, Geographic Township of Wilmot.

Baden is a Township Urban Area within the Township of Wilmot, and as such, the immediate neighbourhood surrounding the site is characterized by a mix and range of uses, including residential, commercial, institutional and industrial. The location of the site is shown on **Figure 1.**

The site is approximately 0.73 hectares (1. 8 acres) in size and is located immediately west of the traditional urban core of Baden. The site can be characterized as a through lot, with approximately 114 metres of frontage along Beck Street and 40 metres of frontage along Charles Street. 67 Beck has a history of industrial use associated with the former Baden Linseed Oil Works and are currently vacant, with remaining structures – grain elevators/facility and related infrastructure oriented to the Charles Street frontage – having been demolished. Tracks associated with a former rail spur that served the former Linseed Oil Works were also previously removed from the site. The former alleyway was never developed and is currently maintained as a vacant grassed area.

Beck Street is a local road with pavement ending mid-way along the frontage of the site. Footpaths exist through the road allowance to access adjacent lands to the west. Charles Street is also a local road, which provides access to the Baden Feed Mill and Supply to the south at 75 Charles Street as well as residential areas fronting the balance of Charles Street, Queen Street and St. George Street.

The western portion of the site consists of a vacant partially grassed area, with the eastern portion of the property graded with a gravel surface. The lands slope downward from Beck Street to Charles Street, with an elevation difference of approximately 2.75 metres.

Surrounding lands generally accommodate a range of uses. A context plan illustrating the uses surrounding the site and within Baden is included as **Figure 2** to this Report. As illustrated, surrounding land uses generally include the following:

NORTH: An industrial building is located across Beck Street from the site, with a main track of the Canadian National Railway – both passenger and freight – located beyond the industrial building. An established residential neighbourhood is situated further to the north of the tracks.

Figure 2

Context Plan

67 Beck Street, Baden
City of Wilmot
Region of Waterloo

LEGEND

Site

400m & 800m Radius
(5 & 10 min Walking Distance)

Souce: Region of Waterloo (2022)

DATE: January 2026

SCALE: 1:3,000

FILE: 21294B

DRAWN: CAC/LC

north

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EAST: Single detached dwellings, St. James Lutheran Church and Baden Feed & Supply are located adjacent to the site to the east. Residential uses predominate one block east of the site and include community and institutional uses such as the Wilmot Seniors Woodworking and Craft Shop, and Livingston Presbyterian Church. The intersection of Foundry Street and Snyder's Road West is situated northeast of the site, which constitutes a focal point for the urban core area and where commercial uses predominate.

SOUTH: A small complex of industrial buildings approximately one to five storeys in height, is located to the south across Charles Street, which accommodates Baden Feed & Supply. Truck traffic as a result of this operation utilizes Charles Street. Low-rise residential uses both abut the site and front Charles Street west of the industrial property. The Baden Pond, a local open space amenity, is located to the southwest.

WEST: A vacant, undeveloped parcel is adjacent to the western limit of the site and also forms a portion of the Township Urban Area Boundary. Agricultural land uses predominate further west and outside of the urban area boundary.

Generally, the site is located in the western limit of the Baden Urban Area, within walking distance to a number of amenities and services, including commercial uses, churches, and Baden Pond. The site and its immediate vicinity are illustrated in the images included on the following page.



Image 1. *Looking west to the terminus of Beck Street*



Image 2. *The site looking southward towards Baden Feed & Supply*



Image 3. *Adjacent properties to east of the site, along Beck and Mill Streets*



Image 4. *The site looking southwest from Beck Street*

2.1 Existing Planning Controls

Baden is a designated Township Urban Area within Wilmot Township, with the site being located within the Delineated Built-Up Area as per the Region of Waterloo Official Plan. The lands are further designated within the Township Urban Growth Centre as per the Township of Wilmot Official Plan. At the Regional level, Township Urban Growth Centres are considered 'strategic growth areas'. While the majority of growth within the Township is to be directed to the Township Urban Area, the Township Urban Growth Centre is to accommodate higher levels of growth and development within Wilmot.

In addition to being designated within the Township Urban Growth Centre, the site is further designated as Light Industrial in the Township of Wilmot Official Plan. While lands within the Urban Growth Centre are to be the focus for accommodating urbanization and higher-density mixed-use development in a compact urban form, lands designated for light industrial uses are intended to accommodate employment uses that are compatible with surrounding sensitive land uses, such as residential. The site as well as adjacent industrially designated properties, were excluded from the Regional Employment Area through the last review of the Regional Official Plan. As a result, conformity to employment conversion policies are not required.

In conformity with their current industrial land use designation, 67 Beck Street is zoned for industrial purposes (Z10) in the Township of Wilmot Zoning By-law, with permitted uses within the zone category being industrial in nature, including manufacturing and related uses, among others. The former alleyway is currently zoned for residential purposes (Z3), despite its current designation for industrial uses in the Official Plan.

Based on the above, while the site is designated and primarily zoned for industrial uses, the location of the site within the Township Urban Growth Centre and outside of the Regional Employment Area provides an opportunity to establish alternative uses – such as residential – through redevelopment, and at greater densities than in other areas of Baden.

3.0 PROPOSED DEVELOPMENT

The proposed development represents an opportunity for residential redevelopment and intensification of a vacant, underutilized and serviceable parcel of land adjacent to the traditional core area of Baden. It will accommodate a compatible housing form, contributing to the overall range and mix of housing in the local community. The preliminary concept plan for the proposed development is illustrated in **Figure 3** of this Report and is further described below.

3.1.1 Urbanization of Beck Street and Cul-de-Sac

The redevelopment of the site will involve the urbanization of Beck Street across a portion of the frontage of the site, as well as the establishment of a temporary cul-de-sac, primarily located within the Beck Street right-of-way. The need for a cul-de-sac was identified by Township staff through the pre-consultation process to support snow clearing from Beck Street as well as other routine road maintenance activities. The proposed 12 metre radius cul-de-sac is located west of the existing hydrant on Beck Street, with the majority of the bulb accommodated within the Beck Street right-of-way. The southern portion of the cul-de-sac encroaches onto the site as the Beck Street right-of-way is of an insufficient width to accommodate the required bulb radius. The cul-de-sac will include a curb cut for drainage purposes as well as to accommodate access to the vacant parcel to the west, within the existing Beck Street right-of-way.

The encroachment of the cul-de-sac will require the establishment of a temporary easement between the Township and the Owner to permit vehicular access over the southern portion of the bulb, as the land will remain under private ownership. Upon development of the vacant lands to the west, Beck Street will be required to be extended and at that time the cul-de-sac would be removed, the proposed parking area would be expanded by two spaces, with the front yard of the site restored and landscaped consistent with the remaining frontage of the site.

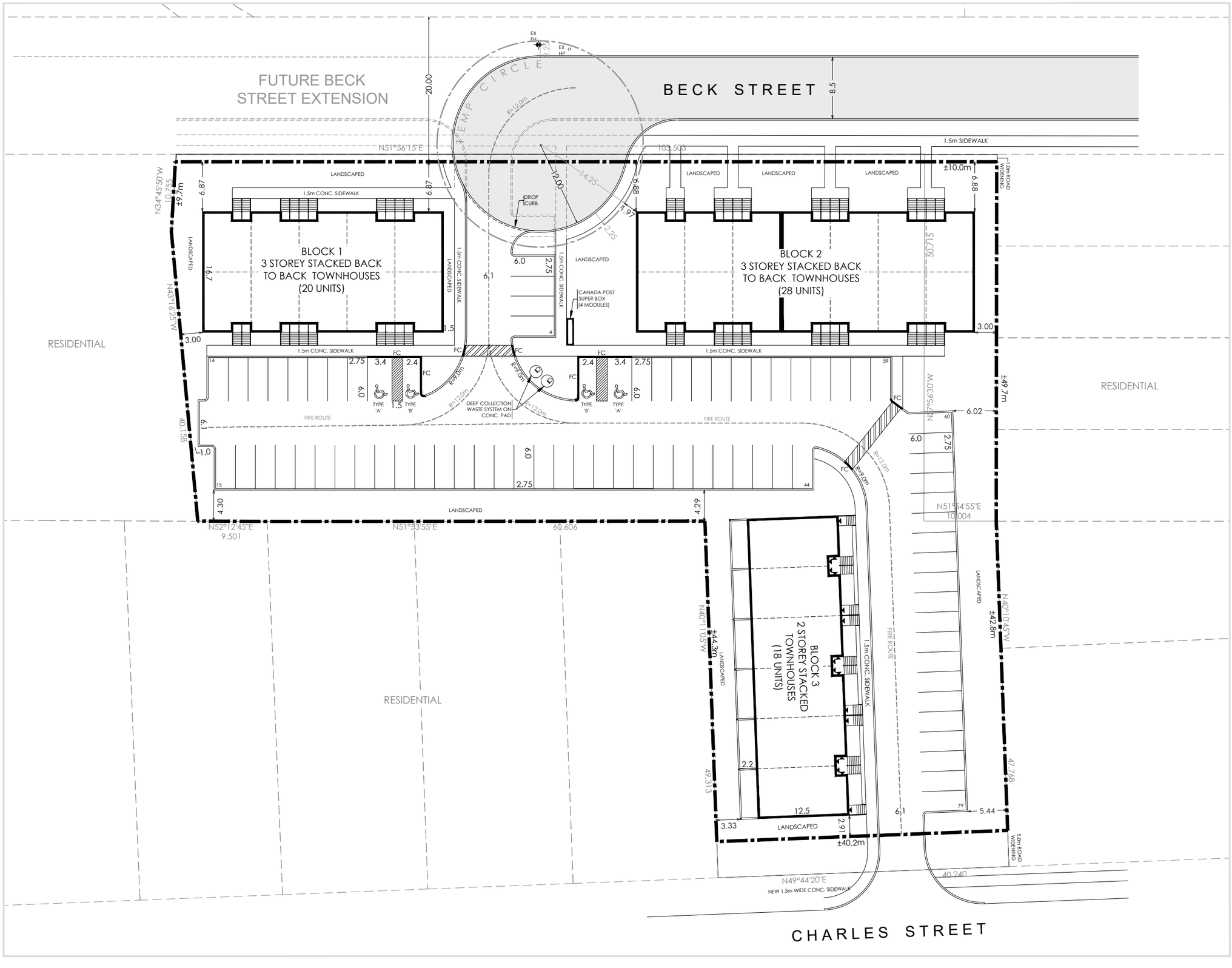
Ultimately, the Beck Street cul-de-sac influences the overall design of the proposed development, as a result of the significant encroachment of this infrastructure into the site.

3.1.2 Stacked Townhouses

A total of 66 units in the form of stacked townhouses are proposed within the development. 48 units are proposed along Beck Street, within two buildings (Blocks 1 and 2) and arranged as back-to-back stacked townhouse units. In the back-to-back arrangement, half of the units will front, and face Beck Street and the remaining units will face internal to the lands. The proposed units are approximately 1,100 square feet in size. A three-storey building height is proposed along Beck Street in consideration of existing uses to the north and existing dwelling heights to the east.

Figure 3
Proposed Development Concept

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo



LEGEND

Subject Lands

Survey: Plan 58R-18634, McKechnie Surveying Inc. (May 25, 2015)

DATE Jan. 12, 2026

SCALE 1:500

DRAWN LC/CAC

FILE 21294B

north

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Block 3, containing 18 stacked townhouse units in a two-storey building, is located on the southern portion of the site and oriented perpendicular to Charles Street. Proposed units range in size from 870 square feet to 1,000 square feet.

The proposed development has a density of 90 units per hectare and is estimated to accommodate 106 people (or 145 people per hectare) based on the average persons per unit (PPU) value of 1.820 for apartments as per the 2019 Township of Wilmot Development Charges Background Study.

3.1.3 Site Circulation, Access and Parking

Two accesses, one from each Beck Street and Charles Street, will serve the proposed development and form the basis for the site circulation within the site. The Beck Street access is proposed from the temporary cul-de-sac and will be extended to Beck Street upon removal of the temporary cul-de-sac when Beck Street is extended further west. Surface parking to support the development, being 79 spaces (at a rate of 1.2 spaces/unit), will be provided behind new residential buildings and along the eastern side of the site and therefore screened from the public realm. Pedestrian access to the site is provided by the proposed extension of the public sidewalk along the Beck Street frontage, providing direct access to units within Block 2. For Blocks 1 and 2, internal sidewalks are proposed on either side of the driveway access from Beck Street and portions of the cul-de-sac to provide access from the parking area to units on the north side of Blocks 1 and 2. While the sidewalk in front of Block 2 is proposed within the Beck Street road allowance, the sidewalk in front of Block 1 is proposed within the site recognizing the likely longer-term timing of the extension of Beck Street further to the west. Upon the ultimate extension of Beck Street, the proposed sidewalk in front of Block 1 can be removed and existing walkways to individual units extended to the public sidewalk in the Beck Street road allowance, the same as the proposed condition for Block 2 units.

The sidewalk is further extended southward into the site along proposed parking areas or driveways to the southern end of the site and Charles Street, with access over proposed internal driveways facilitated by drop curbing and hatching. Overall, the internal pedestrian network provides connections between Charles and Beck Streets and all units within the proposed development.

3.1.4 Landscaped Areas

Landscaped areas will be provided around the perimeter of the site, providing sufficient space for landscaping and fencing to soften the edges of the development and provide screening to adjacent properties. A generous front yard along Beck Street creates opportunities for enhanced landscaping along the front of the site. Overall, approximately 26% of the site is dedicated to landscaped open space.

3.1.5 Road Widenings

Required road widenings along Beck and Charles Streets are accommodated in the preliminary site plan. Required widenings include one metre along Beck Street and five metres along Charles Street.

3.2 Official Plan Amendment

The site is currently designated 'Light Industrial' in the Township of Wilmot Official Plan and is also located within the Township Urban Growth Centre. Redesignation of the site to the 'Urban Residential' land use designation is required to permit the proposed residential land use. Lands within the Urban Residential designation are intended to provide for a range of residential uses in both Baden and New Hamburg in order to accommodate residential land needs.

3.3 Zoning By-law Amendment

To establish residential use permissions and provide for the development as proposed an amendment to the Township of Wilmot Zoning By-law No. 83-38 is required. The proposed Zoning By-law Amendment involves rezoning the site from Z10 (an industrial zone category) and Z3 (a residential zone category) to residential zone category Z4. Special provisions related to the following are also required and are discussed in detail in Section 4.5 of this Report:

- Minimum front yard setback of 6.8 metres;
- Minimum interior side yard setback of 3 metres;
- Minimum rear yard setback of 2.9 metres; and
- Minimum parking ratio of 1.2 spaces per unit.

The proposed Zoning By-law Amendment is provided in **Appendix A**.

4.0 SUPPORTING STUDIES

The following is a summary of the key findings and recommendations of the supporting technical reports and studies that were required to support the proposed application.

4.1 Functional Servicing and Stormwater Management Report

MTE Consultants Inc. was retained to complete a Functional Servicing and Stormwater Management (FSSWM) Report for the proposed residential development. The discussion and analysis contained in the Report address both the interim condition for site development – being the Beck Street cul-de-sac – as well as the ultimate build out condition, upon extension of Beck Street to the west.

The development is proposed to be broken up into two Phases with phased occupancy. Phase 1 includes Block 3 along Charles Street with 18 units. Phase 2 includes Blocks 1 and 2 with 40 back-to-back units fronting Beck Street. The intent is to construct the majority of the underground civil infrastructure as part of Phase 1. Civil servicing laterals to each block will be shown at the Site Plan Approval stage.

4.1.1 Water

To service the development, a new 150mm watermain connection to the existing 150mm watermain along Charles Street is proposed. The mew watermain will be extended along the driveway within the development and branch off to service the three buildings, with each unit being serviced off the main with a minimum 25mm domestic water service.

With respect to fire suppression, existing municipal fire hydrants along Beck and Charles Streets along with the proposed on-site hydrant will provide adequate fire protection for the proposed buildings.

4.1.2 Sanitary

There is a municipal sanitary sewer along Beck Street which drains towards the east and then south along Mill Street. The closest municipal manhole is located at the existing west limits of Beck Street. There does not appear to be any sanitary services to the vacant property from Beck Street.

It is proposed that the Site will be serviced by a new 200mm diameter sanitary sewer complete with new manhole installed at the municipal sewer on Charles Street. The new sewer will enter the Site through the driveway entrance off Charles Street. Each unit will have a minimum 100mm diameter service off the main at a slope that provides depth for the servicing of the buildings while maintaining adequate capacity.

Surcharging in the sanitary sewer network proximate to the Site will be remedied by the Baden Trunk Sewer and related new Baden sanitary pumping station. The trunk sewer project has progressed significantly since the initial applications submitted for the proposed development, and it is intended that progress of the Baden trunk sewer project will be monitored as the development moves through Site Plan Approval and Building Permit. As such, sanitary servicing for the proposed development should be feasible, and it is anticipated that there will be sufficient capacity in the municipal system to accommodate the development by the time of construction and occupancy.

4.1.3 Grading

The proposed grading strategy for the site will respect the existing Site constraints and will maintain existing grades along the south, east, and west property lines and match to existing Beck Street grades while maintaining positive drainage toward the right-of-way. Regrading will also involve raising the southwest of the property to direct storm runoff from the neighbouring southwest properties. Grading for the proposed Beck Street turn around will generally follow existing grades and drainage patterns. Accessible grading will be further detailed at the SPA stage.

4.1.4 Stormwater Management

A private storm water sewer system will be installed on-site to collect rooftop runoff from buildings and runoff from the common driveway and parking areas and each building will be serviced by storm laterals. The runoff collected from storm sewers will be directed to an Oil Grit Separator unit located near the Chrales Street driveway entrance to treat the water quality before entering into the municipal storm sewer within Charles Street. The connection to the municipal storm sewer will be facilitated by installing a new manhole in the Charles Street right-of-way, so as to avoid proposed infrastructure crossing neighbouring property lines. Runoff from the frontage of the property, and green space will flow towards the Charles Street and Beck Street rights-of-way.

4.2 Transportation Impact Assessment and Parking Study

Paradigm Transportation Solutions Limited (Paradigm) was retained to prepare a Transportation Impact Study (TIS) and Parking Study for the proposed development. The findings of the reports are as follows:

- Under existing conditions the study intersections (Mill Street and Beck Street, and Mill Street and Charles Street) are operating at acceptable levels of service and within capacity. There are no critical movements;
- Under future background traffic conditions, the study intersections are forecast to operate similar to existing conditions. No critical movements are forecast.
- Development of the site is estimated to generate 43 trips in the weekday AM peak hour and 49 trips in the weekday PM peak hour.
- Under future total traffic conditions, (that is, with development of the subject site), the study intersections are forecast to operate similar to background conditions. The site driveway onto Beck Street is forecast to operate at LOS A, with v/c ratios no greater than 0.02. The site

driveway onto Charles Street is forecast to operate at LOS A (very low delay), with v/c ratios no greater than 0.01.

Based on the findings of this report, it is concluded that development of the site is forecast to have a negligible impact on traffic operations of the local roads in the area.

The combined study conducted by Paradigm investigated the proposed development's parking viability to determine if the proposed ratio would be compatible with the residential units. The findings of the study are that parking demand data published by the Institute of Transportation Engineers (ITE) suggest a peak parking demand of 0.91 to 1.26 spaces per unit, depending on the number of bedrooms per dwelling unit. The proposed site provides a parking ratio of 1.2 spaces per unit which differs from the Township of Wilmot Zoning By-law 2020-026 parking requirement of minimum of 2.5 spaces per unit. The proposed parking spaces for this development are adequate to accommodate estimated parking demands based on data published by ITE.

The study also provides that the use of existing vehicle ownership characteristics to estimate parking demands is considered inadequate because the built form of the proposed development is inconsistent with existing townhouses in Baden. Existing townhouse developments in the community typically feature single or double car garages with driveways. This is opposite to the proposed development, which features stacked townhouse units with open-air surface parking. Based on the conclusions of the parking study, it was recommended that a minimum of 83 parking spaces (1.26 spaces per unit) be provided to accommodate estimated parking demands. The study further recommends that if additional parking spaces cannot be provided on-site, it is recommended transportation demand management initiatives – being the unbundling of parking spaces from the purchase price of individual units - be implemented to encourage lower vehicle ownership rates and lower parking demands on-site. The study further notes that parking demands could also be reduced by reducing the number of bedrooms in some proposed units, the parking requirement can be reduced based on the number of bedrooms in some units, as the ITE data indicate the number of bedrooms influences parking demands. The opportunity to include one-bedroom units within the development can be further explored during the review of the submitted applications.

4.3 Archaeological Assessment

Archaeological Services Inc. (ASI) was retained to undertake a Stage 1 and 2 Archaeological Assessment for 67 Beck Street. The Stage 1 background research entailed consideration of the proximity of previously registered archaeological sites and the original environmental setting of the property, along with nineteenth- and twentieth-century settlement trends and a review of available aerial imagery. This work was also guided by the 1989 Waterloo Regional Archaeological Facilities Master Plan. The Stage 1 research indicated there was potential for the presence of both Indigenous and Euro-Canadian archaeological resources within the site.

The Stage 2 assessment was conducted on July 18, 2023. The initial field review determined that an area representing 58% of the site was disturbed and did not retain archaeological potential. The balance of the property was assessed by means of a test pit survey initiated at five-metre intervals and increased to 10-metre intervals upon encountering disturbance. No archaeological resources were encountered during the survey.

Given the Stage 1 and 2 Assessment results, no further archaeological assessment was recommended.

The Stage 1 and 2 Archaeological Assessment Report was submitted to the Ministry of Tourism, Culture and Sport on October 13th, 2023. A Letter of Acknowledgement from the Ministry was received on January 4th, 2024, and was previously submitted to the Township.

A Stage 1 and 2 Archaeological Assessment is currently underway for the balance of the subject lands, being the recently acquired alleyway parcel. The Assessment will be submitted to the Township for review upon completion, as well as to the Ministry for review and acceptance.

4.4 Noise and Vibration Study

HGC Engineering prepared a revised Noise and Vibration Feasibility Study to assess the potential impacts of traffic, stationery and rail noise on the proposed development as well as vibration impacts from the nearby railway. The revised Report addresses comments previously received from agencies stemming from initial circulation of the applications and previous technical study submission. Based on HGC's analysis, the following was determined with respect to predicted noise levels at the development:

- Predicted sound levels due to the operation of the existing Pestell Pet Products storage facility located north of the subject lands across Beck Street were determined, under worst case scenario, to be within the Ministry of Environment, Conservation and Parks (MECP) guideline limit and as such mitigation measures are not required;
- Sound emissions of the feed packaging facility located south of the subject lands across Charles Street was found to be negligible;
- Predicted daytime sound levels in the rear yards of Block 3 townhouse units is within the MECP guideline limit and as such physical mitigation is not required. Given proposed balconies associated with units in Blocks 1 and 2 will be less than 4 metres in depth, they are excluded from the noise traffic assessment as per MECP guidelines; and
- Predicted sound levels at the north/west/east façades of Blocks 1 and 2 facing the railway will exceed MECP daytime and nighttime guideline limits due to rail traffic noise.

To address rail traffic noise, the following mitigation measures are recommended so that indoor sound levels comply with MECP noise criteria:

- Mandatory central air conditioning for all dwelling units, based on the proximity of the development to the rail line;
- Brick veneer or masonry equivalent exterior wall construction on the north/east/west façades of Blocks 1 and 2 facing the railway;
- Upgraded glazing constructions are required for the north/east/west façades of Blocks 1 and 2, as further detailed within the Report; and
- The use of warning clauses in the property and tenancy agreements to inform future residents of traffic noise issues.

With respect to ground-borne vibration from rail traffic, the results of the study indicated that vibration levels are generally below the CN criteria of 0.14 mm/s, with the exception of one measured pass-by 15 metres from the railway right-of-way, which marginally exceeded the CN limits by 0.003

mm/s. The excess was noted as brief and uncommon among other measured pass-bys. To address comments regarding the ground-borne vibration study results in previous versions of the HGC Report, the following recommendations are included for the design of future buildings:

- Thickness of foundation walls for the north/east/west façades of Blocks 1 and 2 be increased to 300 mm; and
- Incorporation of a resilient layer to line the outside of the foundation walls for the north/east/west facades of Blocks 1 and 2, consistent with Section 3.5.2.1 of the Federation of Canadian Municipalities Guidelines for New Development in Proximity to Railway Operations, 2013.

To ensure that the recommended noise implementation measures are properly implemented, the Report further recommends the following:

- Prior to the issuance of building permits for the development, a Professional Engineer qualified to perform acoustical engineering services in Ontario should review the detailed architectural plans and building elevations to refine glazing requirements based on actual window to floor ratios for Blocks 1 and 2; and
- Prior to the issuance of occupancy permits for the development, the Township's building inspector or a Professional Engineer qualified to perform acoustical engineering services in Ontario should certify that the noise control measures have been properly installed and constructed.

The Report concludes that the results of the study indicate that the proposed development is feasible with the implementation of noise control measures as recommended therein.

5.0 POLICY ANALYSIS

The following is a review of the Provincial, Regional and Municipal land use policy framework applicable to the site, and how the proposal has met those considerations.

5.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 ("PPS") was issued by the Province of Ontario in accordance with Section 3 of the Planning Act. The 2024 PPS applies to all decisions regarding land use planning matters made on or after October 20th, 2024.

The PPS provides policy direction on matters of provincial interest related to land use planning and development. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure. The PPS strongly encourages development that will provide long term prosperity, environmental health and social wellbeing. One of the key considerations of the PPS is that planning decisions 'shall be consistent' with the Planning Statement. The following is an analysis of the proposed development in the context of the policies in the PPS.

5.1.1 Settlement Areas

Section 2.3.1 of the PPS states that Settlement Areas shall be the focus of growth and development, and within settlement areas, growth should be focused in, where applicable, strategic growth areas. The proposed development is located within Baden, a Township Urban Settlement Area and further located within a Township Urban Growth Centre as established in the Regional Official Plan. In addition to encouraging a range of uses and opportunities for intensification and redevelopment, Section 2.3.1.2 of the PPS states that land use patterns within settlement areas shall be based on densities and a mix of land uses which, among other matters:

- efficiently use land and resources;
- optimize existing and planned infrastructure and public service facilities;
- support active transportation;

Furthermore, section 2.3.1.3 states that Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities. The proposed development offers the opportunity to redevelop an underutilized and vacant parcel of land within Baden's Urban Growth Centre to efficiently use land, existing municipal services and resources to provide for additional residential units at a slightly greater density than the surrounding area. Furthermore, the proposed dwelling form – being stacked townhouse units – would diversity the range and mix of housing available within the community.

5.1.2 Housing

Policy 2.2.1b) of the PPS states that an appropriate range and mix of housing options and densities shall be provided to meet projected needs of current and future residents of the regional market area by, in part, permitting and facilitating all types of residential intensification, including the redevelopment of underutilized commercial and institutional sites and the development and introduction of new housing options within previously developed areas. The now vacant site was historically used for industrial purposes and has since been made available for residential development through the issuance of a Record of Site Condition and removal from the Regional Employment Area through the last Regional Official Plan Review. The proposed development introduces a relatively new housing form to the community in the interest of both residential intensification and diversification of the local housing stock, consistent with this policy.

Promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation is also identified a means for planning authorities to meet projected needs of current and future residents by Policy 2.2.1c). The proposed development achieves a higher density than the surrounding community and as such represents an efficient and effective use of urban land and infrastructure in an area identified to accommodate intensification within Baden. The residential units will be desirable to a variety of residents given the site's location in proximity to the village core and within the Baden community itself.

5.1.3 Strategic Growth Areas

The site is located within the Town of Baden's Urban Growth Centre, which is considered a Strategic Growth Area. The PPS defines a Strategic Growth Area as:

> *"means within settlement areas, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher density mixed uses in a more compact built form."*

The Township Urban Growth Centre is identified for focused growth and development as per Policy 2.4.1.1 of the PPS. Strategic growth areas should be planned, in part, to include a range of mix of housing options, intensification, and should be planned to accommodate significant population, and support affordable, accessible, and equitable housing (2.4.1.2). The proposed development is a form of intensification and creates housing opportunities in a more compact form on vacant lands. The proposed stacked townhomes offer a different and more affordable housing option within the community when compared to the existing housing stock, which consists of predominantly single-detached dwellings. The proposed development will aid in increasing the housing supply within the Township and introduce a new housing typology within the community that has the capacity to meet the needs of, and appeal to, a wider demographic.

5.1.4 Land Use Compatibility

While the site and surrounding area were removed from the Regional Employment Area through the last Regional Official Plan review, the site remains designated for employment (industrial) purposes and is in proximity to industrial lands that continue to operate opposite the site to the north and south. Furthermore, the CN rail line, which carries both passengers and freight rail traffic, is situated north of the site beyond Beck Street. Policy 3.5.6.1 of the PPS states that major facilities, such as

industrial uses and railways, shall be planned to develop and avoid, or if avoidance is not possible – minimize and mitigate – potential adverse effects from noise, odour and other contaminants. Ensuing the long-term operational and economic viability of major facilities and in accordance with provincial guidelines, standards and procedures is also a directive under Policy 3.5.1.

The Noise and Vibration Feasibility Study undertaken by HGC Engineering indicates that the proposed development is feasible with the implementation of recommended noise control measures as identified in the Study and summarized in Section 4.5 herein. Furthermore, the results of calculations associated with the nearby industrial facilities indicated that sound levels due to operations are within Ministry of Environment, Conservation and Parks limits at the proposed development under the worst case operational scenario, and therefore mitigation is not required.

Policy 3.4.1 further states that planning in the vicinity of rail facilities shall be undertaken so that the long-term operation and economic role of rail facilities is protected, and that sensitive uses are appropriately designed, buffered and/or separated from rail facilities, in accordance with Section 3.5 of the PPS.

The site is located more than 30 metres from the railway and as such proposed dwellings meet the minimum setback distances established in the *Guidelines for New Development in Proximity to Railway Operations*. Furthermore, measures recommended in the Noise and Vibration Feasibility Study intended to mitigate potential noise and vibration impacts from the operation of the railway are to be included in the future design and construction of the proposed buildings and as such the development is consistent with Policy 3.4.1.

5.1.5 Energy Conservation, Air Quality and Climate Change

Policy 2.9.1 of the PPS provides that planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:

a) support the achievement of compact, transit-supportive, and complete communities;

b) incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;

c) support energy conservation and efficiency;

d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and

e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.

The proposed development represents a compact residential dwelling form and is located within a five minute walking distance to the urban core of Baden, which is generally focussed along Snyder's Road East and Foundry Streets. Opportunity exists through the design of future buildings to incorporate materials and technologies that ultimately reduce carbon footprints and improve resilience to climate change.

5.1.6 Infrastructure and Facilities

Policy 3.1.1 of the PPS provides that infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management, so they are financially viable over their life cycle and leverage the capacity of development proponents, where appropriate.

Further, policy 2.6.3 provides that municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety.

The Concept Plan and proposed servicing and stormwater management strategies are consistent with the PPS policies regarding infrastructure, servicing, and stormwater management. The proposed development will be serviced by new municipal connections for storm, sanitary and water from existing infrastructure fronting the site.

5.1.7 Transportation

Policy 3.2 of the PPS identifies that transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero-and low-emission vehicles. As part of a multi-modal transportation system, connectivity within and among transportation systems and modes should be planned for, maintained and improved.

A detailed assessment of the current road network is included in the Transportation Impact Assessment. Both Beck Street and Charles Street are classified as Township roads and connect to Foundry Street and Snyder's Road, which are Regional roads. Snyder's Road includes bus stops associated with GRT busPlus Route 77 (Wilmot) that connects Baden to other areas in the Region. The proposed development makes efficient use of existing streets by providing driveway accesses to both Beck and Charles Streets. The Concept Plan includes the urbanization of Beck Street and a cul-de-sac mid-block to the proposed development to accommodate traffic in and out of the site, as well as the extension of the existing public sidewalk system. The proposed development has further been designed to accommodate a western extension of Beck Street when required.

5.1.8 Sewage, Water and Stormwater

Policy 3.6.1 of the PPS states that municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. The proposed development will be serviced by connecting to existing municipal water, sewer and stormwater infrastructure as detailed in the Functional Servicing and Stormwater Management Report, consistent with this policy.

5.1.9 Cultural Heritage and Archaeology

Policy 4.6.2 states that development and site alteration shall not be permitted on lands containing archaeological resources or areas of archeological potential unless the significant archaeological resources have been conserved. An Archaeological Assessment has been completed for 67 Beck

Street, and resulted in no archaeological resources found during the Stage 2 survey, and therefore concluded that no further assessment was required. The Assessment was submitted to the Ministry, with a Letter of Acknowledgement being issued on January 4, 2024.

A Stage 1 and 2 Archaeological Assessment is currently underway for the former alleyway parcel on the site.

5.1.10 Human Made Hazards

Policy 5.3.1 of the PPS provides that sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects. All potential contaminants from the previous use have been removed from the Site and a Record of Site Condition has been issued by the Province.

5.1.11 PPS Summary

The proposed development is consistent with the policies of the PPS. Development of the site represents a minor intensification and development of a former brownfield site within a Strategic Growth Area, diversifies the type of and amount of housing available within Baden, and generally contributes to achieving a complete community. The proposed development would utilize existing and planned infrastructure, municipal services and the existing transportation/transit network, and ensures land use compatibility with surrounding uses.

5.2 Region of Waterloo Official Plan

The Region of Waterloo's 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 establishes 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 with Modifications on April 11, 2023. ROPA 6 established a new policy framework for Chapter 2 – Where and How to Grow of the ROP 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 Regional Official Plan.

Effective January 1, 2025, the Region is no longer a planning approval authority and as such the ROP is now an Official Plan of each area municipality, including the Township of Wilmot. Until that time when the policies of the ROP are repealed or amended by the Township, the ROP continues to apply. The purpose of the Regional Official Plan is to provide guidance at a municipal level for development of complete communities, protecting the natural environment and resources, conserving cultural heritage, and respecting scale, physical character and context of established neighbourhoods.

The subject lands are designated as follows in the Regional Official Plan:

- *Delineated Built-Up Area* and *Township Urban Area* as per Map 2: Urban System (see **Figure 4**)



Source: Region of Waterloo (2024)

Figure 4

Region of Waterloo Official Plan - Urban System
(Map 2)

LEGEND

- Site
- Delineated Built-Up Area
- Designated Greenfield Area

DATE:	March 2026
SCALE:	1:10,000
FILE:	21294B
DRAWN:	CAC/LC

north

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67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

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Furthermore, as previously noted the lands are not included in the *Regional Employment Area*, as illustrated in **Figure 5**, and are located one block south and west of Synder's Road West and Foundry Street, which are both Regional roads as per Map 5A to the ROP.

5.2.1 Township Urban Area & Built-Up Area

The site is located within the Township Urban Area, with the Township Urban Area intended to serve as the focus for growth outside of the Urban Area as per Policy 2.E.1.1. The Township of Wilmot has delineated a Township Urban Growth Centre ('TUGC') for Baden as per Policy 2.E.1.3, and includes the Site. Lands within the Township Urban Area are to be planned and developed in conformity with the development criteria for Urban Areas contained in Policy 2.C.2.2 of the Regional Official Plan. The proposed development satisfies the Urban Area development criteria for the following reasons:

- The proposed development will result in the re-urbanization of lands located within the Township Urban Growth Centre, a strategic growth area identified in the Regional Official Plan;
- The proposed development provides for the residential intensification of land within the TUGC at a proposed density of 90 units per hectare and may also serve as a catalyst for further redevelopment and revitalization of the surrounding neighbourhood, when considering the current condition of adjacent industrial properties to the north and south, also located within the TUGC;
- The proposed development provides for a compact form and accommodates additional people living adjacent to Baden's Core Area – which is intended to provide a full range of residential, commercial, institutional, and other service uses – and within walking distance to existing and future commercial uses and services;
- The proposed development introduces a more compact housing form to the community and more specifically within the TUGC, providing an alternative housing option within the community and thereby contributing to the mix of available housing;
- There are no natural features associated with, or adjacent to the subject lands. Furthermore, the lands are not located within a wellhead protection area or issue contributing area as per the Grand River Source Protection Plan;
- The proposed development can be serviced by the existing municipal water and wastewater system;
- The site is located proximate to an existing rail line and industrial type uses. Mitigation measures related to potential noise and vibration impacts as outlined in the Noise and Vibration Feasibility Study will be included in the design of future buildings;
- A Record of Site Condition has been issued by the Province and as such the lands are suitable to be developed for residential uses; and
- The proposed development will require the urbanization of Beck Street, which will include the extension of the existing municipal sidewalk from west of Mill Street. Municipal sidewalks will also be provided along the Charles Street frontage.

Generally, the proposed development fronts and faces Beck Street, siting new buildings as close as possible to Beck Street when considering the need to accommodate a cul-de-sac until the street is



Source: Region of Waterloo (2024)

Figure 5

Region of Waterloo Official Plan - Employment Areas (Map 3)

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

LEGEND

- Site
- Employment Areas
- Urban Area/Township Urban Area

DATE:	March 2026
SCALE:	1:10,000
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DRAWN:	CAC/LC

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extended past the development to the lands to the west to the limit of the Baden Settlement Area. Proposed new buildings are compatible with the height of adjacent buildings and residential dwellings, and will be designed with articulating facades and high-quality materials. Landscaped areas along Beck Street and Charles Street provide the opportunity to accommodate a variety of plant material to enhance and contribute to the public realm. With respect to access to open spaces and parks, the proposed development is located within a five-minute walk to Baden Pond and Baden Parkette and 15 minute walk to Sir Adam Beck Community Park. Baden Hills Regional Forest and Schmidt Woods Trail, located just outside the community, also provide open space access options.

Table 3 of the Regional Official Plan establishes a minimum annual intensification target for the Township of Wilmot, requiring 35% of new residential units being accommodated annually within the built-up area for a total 830 minimum units being established to the year 2051. These intensification targets are minimum standards and area municipalities are encouraged to go beyond these minimum targets, where appropriate and not in conflict with any policy of the Regional Official Plan as per Policy 2.I.5.1. Given the location of the site within a strategic growth area, and therefore intended to play a primary role in achieving the intensification targets of the Regional Official Plan, the proposed development will assist the Township in meeting these minimum intensification targets through the establishment of additional residential units in a compact form.

5.2.2 Land Use Compatibility

Policy 2.I.1.1 speaks to land use compatibility and the need to ensure that major facilities, such as railways and manufacturing uses, are planned and developed to avoid, or if avoidance is not possible, minimize and mitigate potential adverse effects, risk to public health and safety, and ensure the long-term operational and economic viability of major facilities in accordance with Provincial guidelines, standards and procedures. As discussed throughout this Report, a Noise and Vibration Feasibility Study was undertaken for the proposed development given the site's proximity to a railway and existing industrial uses. The Study concluded that with the implementation of recommended mitigation measures, the development if feasible. In this regard, compatibility can be maintained between the proposed development and surrounding non-residential uses and facilities.

5.2.3 Transit-Supportive Development

Policy 2.D.6.1 of the ROP contains transit-supportive development criteria that is to be applied in the review and evaluation of development applications within strategic growth areas. The following is a review of the relevant criteria of 2.D.6.1 with respect to the proposed development:

a) creates an interconnected and multi-modal street pattern that encourages walking, cycling or the use of transit and supports mixed-use development;
The proposed development is located along two local roads, Charles and Beck Street which connect to a broader regional Road network, Foundry Street and Snyder's Road. The site development will include sidewalk expansion along both Charles and Beck Streets that will allow residents to access the site from the broader pedestrian network.

e) supports a high-quality public realm to enhance the identity of the area and create gathering points for social interaction, community events and other activities;
The Site is currently vacant and undeveloped, and currently maintained as grassed and gravel areas. The proposed development contains sufficient yard area along both Beck and Charles

Streets to accommodate a sufficient landscaped area that can accommodate a variety of plantings to enhance the public realm. Furthermore, the urbanization of to the Site will improve the existing condition of this roadway and therefore contribute to the enhancement of the public realm in the immediate neighbourhood.

5.2.4 Region of Waterloo Official Plan Summary

In summary, the proposed development and applications conform to the Region of Waterloo Official Plan by providing for residential intensification within a Township Urban Growth Centre that assists the municipality in meeting its residential intensification target, proposes additional residents within walking distance to existing commercial uses and services, and provides for the redevelopment of vacant former industrial lands while remaining compatible with surrounding land uses.

5.3 Township of Wilmot Official Plan

The Township of Wilmot Official Plan (Township Official Plan) was adopted by Township Council on July 21, 2003, and approved with modifications by the Regional Municipality of Waterloo on August 5, 2004. Official Plan Amendment Number 9 (OPA No. 9) was approved with modifications on March 29, 2019. OPA No. 9 implemented the amendments of ROPA No. 1. The Township Official Plan has yet to be amended to implement Regional Official Plan Amendment No. 6. The Township is currently undertaking an Official Plan Review.

The site is designated as follows in the Township Official Plan:

- Part of the Baden Urban Area as per Map 2.1: Planned Township Structure (see **Figure 6**)
- Urban Growth Centre Overlay and Light Industrial as per Map 4.1: Baden Urban Area (see **Figure 7**)

The following sections of this Report will review the proposed development in the context of the relevant policy framework of the Township Official Plan as it applies both the Site and development as proposed.

5.3.1 Baden Urban Area

The proposed development is located in the Baden Urban Area. Development within the Baden Urban Area is to be planned and developed in the following manner, which is outlined in Policy 2.5.1.3:

a) Supports the Planned Township Structure of the Township Official Plan;

b) Uses municipal water and wastewater services;

c) Protects the natural environment and surface water and groundwater resources;

d) Conserves the Township's cultural heritage resources and supports the adaptive reuse of historic buildings;

e) Respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;

f) Promotes land uses and development patterns that are freight-supportive;



Figure 6

Township of Wilmot Official Plan - Planned Township Structure (Map 2.1)

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

LEGEND

- Site
- Urban Areas
- Countryside Line
- Regional Road
- Township Road
- Lot or Concession

DATE:	January 2026
SCALE:	1:5,000
FILE:	21294B
DRAWN:	CAC/LC

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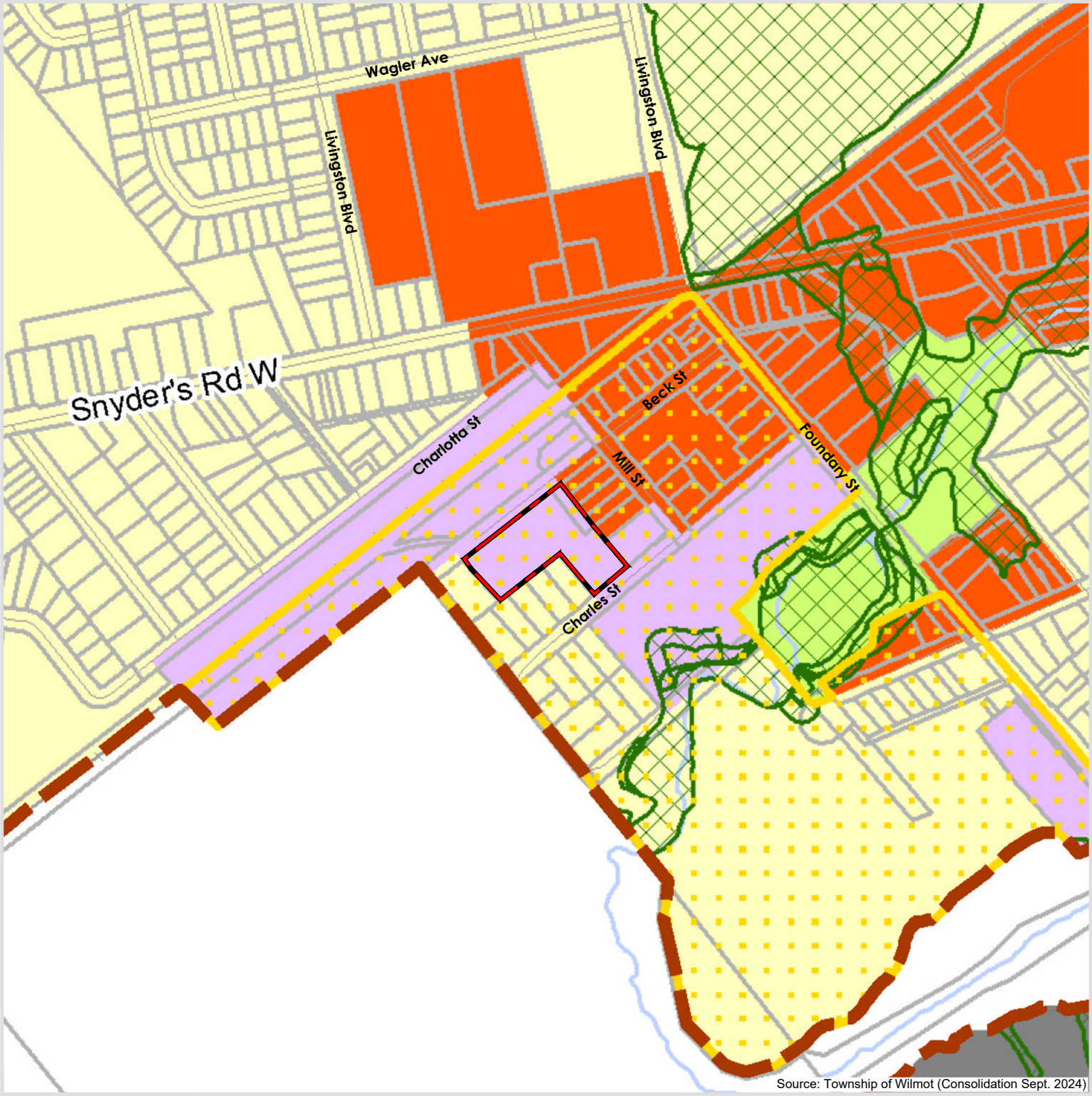

Source: Township of Wilmot (Consolidation Sept. 2024)

Figure 7

Township of Wilmot Official Plan- Baden Urban Area (Map 4.1)

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

LEGEND

- Site
- Urban Area Boundary
- Urban Growth Centre Overlay
- Environmentally Constrained Lands
- Urban Residential
- Urban Core Area
- Light Industrial
- General Industrial
- Open Space

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g) Supports the achievement of complete communities;

h) Expands convenient access to a range of transportation options, public service facilities, open space and recreational facilities, and affordable food options;

i) Ensures the development of a high quality compact built form, attractive and vibrant public realm through site design and urban design standards;

j) Mitigates and adapts to climate change impacts, reduce greenhouse gas emissions and contribute towards the achievement of low-carbon communities; and

k) Integrates green infrastructure and low-impact development.

The proposed development conforms with this policy as it provides for residential uses in a compact dwelling form within the TUGC. The proposed development situates new residents within walking distance to existing and future commercial uses and services within Baden's Urban Core and contributes to the establishment of a complete community. With proposed building heights of three and two storeys, the proposed development transitions appropriately to adjacent residential dwellings and proposed yards of sufficient width to accommodate enhanced landscape plantings that serve to soften the development at the edges along existing streets and adjacent to existing residential lots. A variety of parks and open spaces are within walking distance of the site, and with the urbanization of Beck Street formal pedestrian connections between the site and surrounding neighbourhood will be established. The extension of Beck Street siting of new buildings along street frontages aid in further defining and improving the public realm in the immediate neighbourhood. Generally, the proposed development contributes to a revitalization of the neighbourhood west of Mill Street in an area historically developed for industrial purposes.

5.3.2 Reurbanization Target

Section 2.5.2 provides the policy direction for achieving the 45% region-wide Reurbanization Target established in the Regional Official Plan prior to changes to the regional policy framework through the last ROP update. The proposed development will assist in the achievement of the Township's reurbanization target of 30% as established the current ROP and represents the redevelopment of lands within the Township Urban Growth Centre, a strategic growth area.

The proposed development accommodates residential land uses consistent with the existing neighbourhood to the east, and established dwellings to the southwest at building heights of two and three storeys which are compatible with existing dwellings adjacent to the site. The proposed residential use is compatible with surrounding non-residential uses and through the inclusion of recommended noise and vibration mitigation measures, the operation of the railway will not impact the development. Policy 2.5.2.4 of the Township Official Plan states that the Township will encourage the provision of new dwelling units in the built-up area of Baden, in part, through (1) infill and (2) reurbanization compatible with surrounding uses, except where infrastructure is inadequate or physical constraints are present. Furthermore, given industrially designated lands surrounding the site are no longer within an employment area, it is anticipated that these lands will transition to non-industrial use over time. The proposed development is representative of infill and reurbanization and the development can be serviced by connecting to existing municipal services on Charles Street.

5.3.3 Urban Growth Centre Overlay

The site is located within the Urban Growth Centre overlay for Baden. This designation area includes the traditional urban core of the Town as well as other lands that will be the focus for accommodating reurbanization and higher-density mixed-use development in a more compact urban form. Policy 2.5.5.2 provides direction and criteria for the planning and design of future development in the Urban Growth Centre. The proposed development satisfies the relevant criteria of 2.5.5.2 as follows:

- The proposed development will accommodate a portion of Baden's forecasted population growth and will situate new residents within walking distance of existing and future commercial uses and services within the traditional urban core;
- The proposed development involves redevelopment of vacant lands within the built-up area and as such will contribute to the achievement of the minimum reurbanization (intensification);
- Proposed stacked townhouses contribute to the diversification of existing housing stock within Baden, with the development being compatible with surrounding non-residential (industrial) uses while recognizing these uses will likely transition to other uses over time; and
- The proposed development achieves an overall density greater than existing on lands within the Urban Growth Centre, with the design of the development facilitating an appropriate transition in built form to adjacent lands through building heights that are compatible with surrounding one and two storey dwellings, providing adequate yard depth to accommodate plantings that serve as a buffer to adjacent properties and contribute to enhancement of the public realm, and is set back sufficiently from Beck Street.

Policy 2.5.5.3 states that future commercial development in the Township will be encouraged to locate within the Urban Core Area designation and the Urban Growth Centre overlay. It is our opinion that commercial uses are better located along major and regional roads within the Urban Core Area designation and Urban Growth Centre Overlay because of better visibility, access, and connectivity within the Town. The site is located on local roads, located in the western end of Baden proximate to the Township Urban Settlement Area Boundary and as such is better suited for residential use.

The site (and surrounding industrially designated lands) are defined as 'employment areas' in the Township Official Plan given their current designation for light industrial uses. This area was excluded from the Regional Employment Area through the last review of the Regional Official Plan and are not designated as part of the Regional Employment in Map 3 of the ROP. In this regard, the requirements of Policy 2.2.5.5 regarding the redesignation of lands within an employment area have been met and as such alternative uses, including residential, may be considered for the site.

5.3.4 Urban Residential

The proposed Official Plan Amendment seeks to designate the site from the Light Industrial designation to the Urban Residential designation. The Urban Residential designation applies to areas within the Baden Urban Area where the predominant use of land is for housing and related land uses, with the purpose of the designation being to provide for a range of residential uses to accommodate current and future needs. A mix of housing types and density are encouraged in the designation in accordance with Section 4.2 (Range and Mix of Housing Types) of the Official Plan.

The proposed residential development, in the form of stacked townhouses, has an overall density of 90 units per hectare in recognition of the site's location within the Urban Growth Centre overlay, where higher density development is encouraged in a more compact urban form. The proposed development further represents reurbanization within the built-up area, as well as an efficient use of vacant land through redevelopment in accordance with Policy 4.2.1 a) and b). The proposed development conforms to the policies of the Urban Residential designation, and therefore the Urban Residential designation is appropriate to facilitate the proposed development.

5.3.5 Land Use Compatibility

Development compatible with the location, density and other characteristics is encouraged by Policy 6.1.1, with compatibility addressing the impacts of surrounding uses on the proposed development and impacts of the development on surrounding uses. Policy 6.1.1 provides a number of factors to be considered in assessing compatibility. The following is a review of the proposed development with respect to these factors:

a) The density, scale, height, massing and visual impact of surrounding buildings and the proposed development;
The two and three storey building height within the development is compatible with adjacent one and two storey dwellings and buildings and is consistent with a low-rise built form. Buildings along Beck Street are set back sufficiently from the road allowance, providing ample room for landscaping, including trees, to soften any impact of the development along the street. The proposed yard along Charles Street is also of sufficient width to accommodate landscaping to frame the public realm. Proposed side yards associated with the development are also of sufficient width to accommodate dense plantings to facilitate transitions to rear yard areas of adjacent residential lots.

b) The preservation of the natural environment and cultural heritage resources;
There are no natural environment or cultural heritage features or resources located on the site.

c) The continued visibility and viability of adjacent land uses;
As discussed throughout this Report, the proposed residential use has been demonstrated to not impact the use of industrially-designated lands to the north and south, and potential impacts from the railway on the development can be mitigated through the design of future buildings.

d) Pedestrian, cyclist, and vehicular movement and linkages, and parking requirements;
The proposed development will involve the urbanization of Beck Street and include the extension of public sidewalks along both Beck and Charles Streets. Driveway accesses are provided to both Beck and Charles Streets from the development, and the proposed cul-de-sac has been designed to accommodate winter plowing and appropriate turning radiuses for vehicles. Sidewalks internal to the development connect to both Beck and Charles Streets.

As further discussed in Section 5.4.4 to this Report, the proposed development includes 79 on-site parking spaces for an overall parking ratio of 1.2 spaces, with the opportunity to increase the total number of parking spaces to 81 and ultimately . An additional two parking spaces can be accommodated within the parking area upon the future extension of Beck Street. The

proposed parking ratio of 1.2 spaces per unit is within the peak parking demand range suggested by the Institute of Transportation Engineers as outlined in the Transportation Impact Assessment and Parking Study. The study further indicates that the parking requirement can be reduced based on the number of bedrooms per unit and the implementation of other TDM measures. Currently the proposed development is to include all two-bedroom units; as such there is opportunity to further support the proposed parking ratio by replacing two-bedroom units with one-bedroom units at the site plan approval stage.

e) Landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of proposed and existing developments;
Provided yard setbacks are sufficient to accommodate a variety of plantings, the details of which – as well as site lighting – can be addressed at the site plan approval stage. The proposed development is low-rise in nature and as such is not anticipated to create significant wind or shadow effects on adjacent properties.

f) Noise, dust odours or vibrations generated by surrounding land uses as well as the proposed development; and
Potential noise and vibration impacts can be mitigated through the design of future buildings as outlined in the Noise & Vibration Feasibility Study.

g) Traffic generated by surrounding land uses and the proposed development.
A Traffic Impact Assessment has been completed and concluded that the proposed development will have a negligible impact on the surrounding road network.

With respect to proximity to railways, the submission of a vibration study is required for any proposed sensitive development within 75 metres of a rail line. The submitted Noise and Vibration Study recommends a minimum thickness for the foundation walls of proposed buildings fronting Beck Street to address potential vibrations from the operation of the rail line despite measured vibration levels being generally below CN criteria.

5.3.6 Township of Wilmot Official Plan Summary

In summary, the proposed Official Plan and Zoning By-law Amendments conform to the policies in of the Township of Wilmot Official Plan. This opinion recognizes the following:

- The proposed development represents the reurbanization and redevelopment of a vacant, former industrial site for residential purposes, ultimately providing opportunity to accommodate additional residents within the TUGC and contributing to the reurbanization (intensification) target established for the Township of Wilmot;
- The introduction of stacked townhouse dwelling forms in the community diversifies the available housing stock with Baden, ultimately expanding housing choice to serve a wider demographic; and
- The proposed development is compatible with the built form of the surrounding neighbourhood and operations of existing non-residential uses in the immediate vicinity of the site.

5.4 Township of Wilmot Zoning By-law No. 83-38

The site currently zoned Z10 (industrial) and Z3 (residential) as illustrated in **Figure 8**. An amendment to the Zoning By-law is required to implement the proposed Official Plan Amendment and rezone the site to the Zone 4 (Residential) zone with site-specific provisions to facilitate the development as proposed. The following is a review of the proposed development with respect to the relevant regulations of Zone 4 contained in Section 9.2 of the Zoning By-law:

Table 1- Zoning By-law

Regulation	Required – Zone 4	Proposed	Complies
Permitted Use:	Residential Building – Apartment; defined as *a residential building divided horizontally and vertically to contain more than four dwelling units.*	Stacked and stacked back-to-back townhouses are divided horizontally and vertically, with each block containing more than 4 dwelling units.	Yes
Lot Area (Minimum)	6,720 m^2 for 66 units (740 m^2 for the first unit, 92m^2 for each additional)	7,341 m^2	Yes
Lot Frontage (Minimum)	30 m	113.5 m	Yes
Front Yard Setback (Beck Street) (Minimum)	7.6 m	**6.8 m**	**No**
Interior Side Yard Setback (Minimum)	6 m (3m or ½ building height, whichever is greater)	**3.0 m**	**No**
Rear Yard Setback (Charles Street) (Minimum)	7.5 m	**2.91 m**	**No**
Lot Coverage – Main Building minus Garage (Maximum)	30% (2,146 m^2)	26.6% (1,956 m^2)	Yes
Building Height (Maximum)	10.5 m or 3 storeys, whichever is greater	3 storeys (Blocks 1 and 2)	Yes
Off-Street Parking	2.5 spaces/unit (66 units =165 spaces)	**1.2 spaces/unit[1] (79 spaces)**	**No**
Barrier Free Parking	4% of required parking 79 x 4%= 4 spaces	4 spaces	Yes

[1] *Note that upon future extension of Beck Street and subsequent removal of the cul-de-sac, two additional parking spaces can be accommodated along the driveway access from Beck Street as shown in the submitted Concept Plan, for a total of 81 spaces in the ultimate condition. The result is an overall parking ratio of 1.22 spaces per unit.*



Source: Township of Wilmot (Sept. 30, 2024)

Figure 8

Township of Wilmot
Zoning By-law 83-38
(Part 2A, Schedule 'A')

67 Beck Street, Baden
Township of Wilmot
Region of Waterloo

LEGEND

- Site
- Z2 (Residential)
- Z3 (Residential)
- Z10 (Industrial)
- Z10a (Light Industrial)
- Z11 (Open Space)
- Z12 (Institutional)
- Site Specific (See Section 22)

DATE:	January 2026
SCALE:	1:3,000
FILE:	21294B
DRAWN:	CAC/LC

north

K:\21294B-76 MILL ST-BADEN\RPT\ZBL_JAN2026.DWG

MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9
P: 519.576.3650 F: 519.576.0121 | WWW.MHBCPLAN.COM

As the table above demonstrates, the development complies with the lot area (density), lot coverage, and lot frontage requirements of the Zoning By-law. Site-specific provisions are required to establish reduced: setbacks from both Beck and Charles Streets; interior side yard setback; and parking ratio. The nature of these site-specific provisions is discussed in the following sections below.

5.4.1 Front Yard Setback

A minimum front yard setback of 7.6 metres is required in Zone 4 whereas 6.8 metres is provided in the proposed development. A 6.8 metre front yard remains sufficient to provide adequate area for landscaping along the street and separation between proposed buildings and the public realm. There are no garages or individual driveways associated with the proposed development and as such a greater front yard width is not required to accommodate vehicles parked in driveways, such as may be associated with other forms of low-density development. Lastly, existing residential dwellings along Beck Street west of Mill Street possess significantly narrower front and exterior side yards than that which is accommodated in the proposed development. It is our opinion that a minimum front yard setback of 6.8 metres is appropriate for the proposed development.

5.4.2 Side Yard Setback

Buildings fronting Beck Street (Blocks 1 and 2) possess a side yard setback of 3 metres from interior lot lines, whereas Block 3 is set back 5.5 metres from the interior lot line. The Zone 4 interior side yard setback requires a setback of 3 metres or one-half the building height, whichever is greater. Block 3 is proposed to be two storeys in height, and as such the 5.5 metre side yard setback complies with the Zoning By-law. While the proposed 3 metre setback for Blocks 1 and 2 meets the absolute minimum established for Zone 4, a minimum setback ranging from 5 to 6 metres is required based on a three-storey building height.

The Z4 interior side yard setback provision is representative of a built-form zoning control that ultimately requires a greater setback for greater building heights in the interest of reducing shadowing and overlook on adjacent properties, mitigating potential impacts, and is generally typical of more suburban zone categories. The subject lands are located within the TUGC and as such more intensive development than elsewhere in Baden is encouraged. Rear yards associated with lots fronting Mill Street abut the site along the eastern property line. More specifically, parking lot associated with 50 Mill Street and rear yard area associated with 54 Mill Street abut the site to the east. A 3 metre side yard setback is not anticipated to impact the existing parking lot to the east and provides sufficient area for plantings and other landscaping to buffer the proposed development from adjacent rear yard areas associated with dwelling on Mill Street.

Lands to the west of the site are vacant and undeveloped. In this regard, a 3 metre side yard setback is not anticipated to negatively impact adjacent lands to the west. As noted, a 3 metre side yard width is sufficient to accommodate landscaping and plantings to mitigate any potential impacts to future development west of the site. In recognition of the ultimate 3 metre minimum side yard requirement of Zone 4 and for the reasons provided above, it is our opinion that the reduced minimum side yard is appropriate for the site and proposed development.

5.4.3 Rear Yard Setback

The proposed development has a proposed rear yard setback of 2.9 meters on Charles Street. This setback will be a landscaped buffer between the building and the sidewalk. Given the orientation of the proposed units, the rear yard in this location acts as a side yard. Although the minimum required setback for Zone 4 is 7.5 meters, the landscaped setback will provide a sense of privacy and separation of the property and the public realm.

5.4.4 Off Street Parking

The proposed development will include 79 off-street parking spaces to accommodate future residents within the development, resulting in a parking ratio of 1.2 spaces per unit. Upon extension of Beck Street further to the west, an additional two parking spaces can be accommodated within the parking area with the removal of cul-de-sac, resulting in a total of 81 spaces and overall parking ratio of 1.22 spaces per unit.

Currently, the proposed development accommodates four barrier-free parking spaces within the parking area. Section 6.12.5h) of the Zoning By-law states that barrier free accessible spaces are not required on a lot where there is no barrier-free accessible building. Stacked townhouses are the proposed residential dwelling form within the development, and as such stairs are required to access each unit from the street. Given each unit contains two floors, stairs are included interior to each unit. In this regard, proposed buildings do not include barrier-free access and the provision of barrier-free parking spaces is not required the Zoning By-law. **Image 5** below illustrates the proposed parking area behind Block 2 as per the Concept Plan, whereas **Image 6** illustrates a reconfiguration of that portion of the parking area should two of the barrier free parking spaces be replaced with standard parking stalls and the parking area extended east. In this configuration, two additional parking stalls (being 17 stalls instead of 15) can be accommodated within the proposed parking area for an overall parking total of 81 stalls and parking ratio of 1.22, whereas 83 stalls can be accommodated post-extension of Beck Street (parking ratio of 1.26).

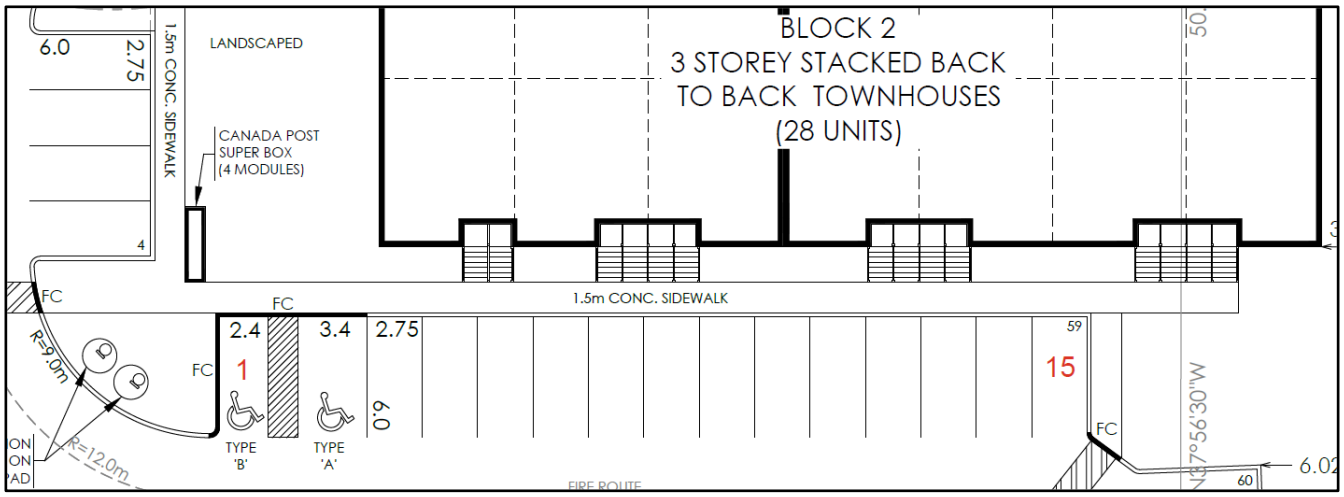


Image 5. Proposed Parking Arrangement – Rear of Block 2

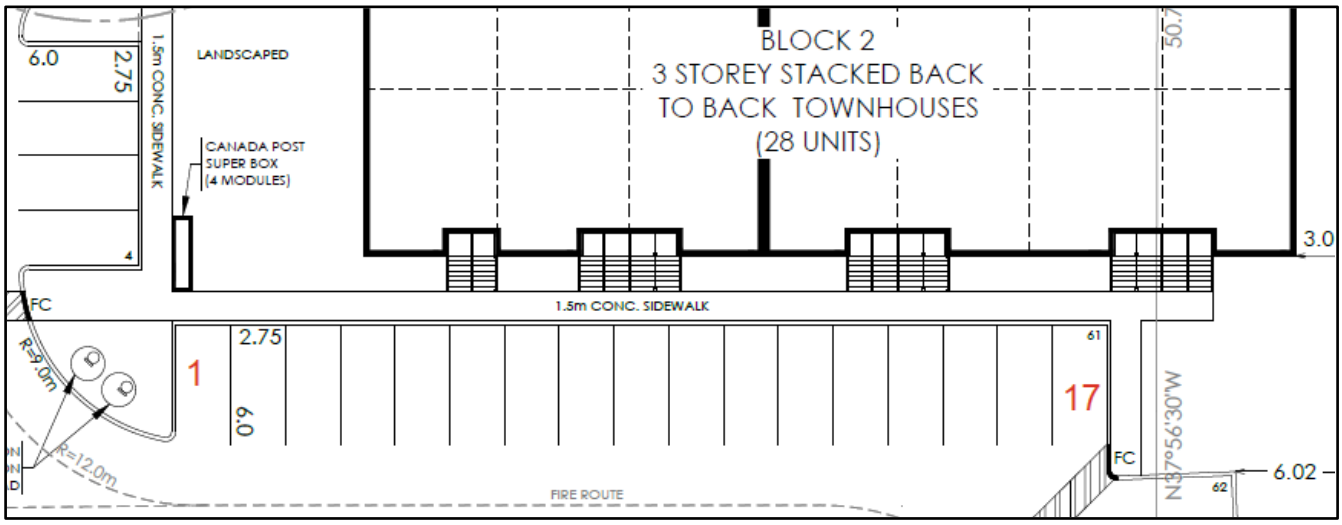


Image 6. Alternative Parking Area Arrangement – Rear of Block 2

While the Transportation Impact Assessment Update and Parking Study recommends a minimum of 83 parking spaces be provided to accommodate the development as proposed, the study further notes that if additional parking spaces cannot be provided on-site, the recommendation is to consider the implementation of Transportation Demand Management (TDM) initiatives – such as unbundling parking spaces from the purchase price of individual units – or reduce the number of bedrooms within some units, as ITE data indicates a relationship between the number of bedrooms in a unit and parking demands. Furthermore, the range of peak parking demand for the development as published by ITE is 0.91 to 1.26 spaces per unit, depending on the number of bedrooms. Considering the analysis and recommendations of the Parking Study and opportunities to both increase the number of parking spaces in the development and establish one-bedroom units within the development at the site plan approval stage, it is our opinion that a parking ratio of 1.2 spaces per unit is appropriate for the proposed development.

5.4.5 Township of Wilmot Zoning By-law Summary

The proposed Zoning By-law Amendment implements the development as proposed and ultimately facilitates the establishment of a more compact building form within an area of Baden where higher-density development is encouraged. Proposed site-specific provisions for building setbacks, while less than that required in the R4 Zone category, remain sufficient to accommodate dense landscaping to both frame the public realm and provide adequate buffering and transition to adjacent properties. The proposed parking ratio is supported by the Parking Study, with the implementation of TDM measures and opportunities to reduce the number of bedrooms in individual units at the detailed design stage.

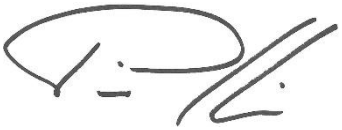
6.0 CONCLUSION

This Planning Justification Report evaluates the proposed Official Plan Amendment and Zoning By-law Amendment applications required to facilitate the proposed development of the site. This Report has assessed the redevelopment in the context of existing land use policies and regulations, including the Provincial Planning Statement (2024), the Region of Waterloo Official Plan, and the Township of Wilmot Official Plan and Township Zoning By-law. The analysis conducted in this report demonstrates that the proposed development is in the public interest and represents good planning for the following reasons:

- The proposed development is consistent with the Provincial Planning Statement and conforms to the Region of Waterloo Official Plan and supports residential intensification within the Built-Up Area of the Baden;
- The proposed development conforms to the Township of Wilmot Official Plan. The lands are within the Township Urban Growth Centre and the proposed development will accommodate additional residents living within walking distance to existing and future commercial uses and services within the traditional urban core;
- The proposed development will optimize the use of existing infrastructure and can adequately be serviced through connections to existing infrastructure;
- The proposed development represents an intensification of vacant and underutilized land within the core area of Baden to accommodate a stacked townhouse housing form, contributing to the overall range and mix of housing available in the community;
- The proposed development is compatible with the surrounding land uses which consist of predominantly single detached dwellings;
- The proposed development does not create any traffic issues, and the proposed parking ratio of 1.2 can be supported with the implementation of recommended transportation demand management strategies and/or the introduction of one-bedroom units through future detailed design of new buildings; and
- The proposed development will comply with the urban design standards set forth by the Township of Wilmot through the site plan approval process.

Respectfully submitted,

MHBC



Pierre Chauvin, MA, MCIP, RPP
Partner



Meghan Lippert, MAES
Planner

A

Appendix A: Proposed Zoning By-law Amendment

TOWNSHIP OF WILMOT BY-LAW
BY-LAW NO. 2026 _____-_____

A BY-LAW TO AMEND ZONING BY-LAW 83-38 BEING A ZONING BY-LAW CONTROLLING DEVELOPMENT WITHIN THE TOWNSHIP OF WILMOT

WHEREAS the Council of the Corporation of the Township of Wilmot (the "Township") deems it desirable to amend By-law 83-38, and amending by-laws, with respect to the lands identified on the attached Schedule "A" in accordance with the provisions of this by-law.

THEREFORE, THE MUNICIPAL COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF WILMOT

ENACTS AS FOLLOWS:

1. By changing the zoning on the affected land on Schedules 'A' from "Industrial (Z10)" and "Residential (Z3)" to "Residential (Z4-X") with special provision.

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 to and forming part of the By-law.

3. Notwithstanding the provisions of By-law 83-38, as amended, the following shall be added as Section 22.XXX. Notwithstanding any other provisions of this By-law, the lands described as Lots 165-168, 173, 174 and Park Lot 169, Plan 627 and Lot 5, Plan 633, Being Part 1 on 58R-18634, Part of Lot 15, South of Snyders Road, and Alley S of Beck Street Plan 633, identified as Section 22.XXX and zoned Zone 4 shall be subject to the following modified regulations:

    a. the minimum interior side yard setback shall be 3.0m
    b. the front yard setback (Beck Street) shall be 6.8 m
    c. the rear yard setback (Charles Street) shall be 2.9m
    d. the minimum parking spaces shall be 1.2 spaces per dwelling unit

4. Except as amended by the preceding regulations, the lands described on Schedule "A" attached to and forming part of this by-law shall be subject to all other applicable regulations as set down by 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 _____, 2026.

READ a third time and finally passed in Open Council on the _____ day of _____, 2026.

MAYOR _____ CLERK _____

MHBC

PLANNING
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& LANDSCAPE
ARCHITECTURE