



DEVELOPMENT SERVICES *Staff Report*

REPORT NO:	DS-2026-13
TO:	Council on June 22, 2026
SUBMITTED BY:	Andrew Martin, MCIP RPP, Director of Development Services
PREPARED BY:	Andrew Martin, MCIP RPP, Director of Development Services
REVIEWED BY:	Jeff Willmer, Chief Administrative Officer
DATE:	June 11, 2026
SUBJECT:	Draft Plan of Subdivision 30T-22602 and Zone Change Application 11-22, Activa Holdings, Baden

RECOMMENDATION:

THAT Report DS-2026-13, Draft Plan of Subdivision 30T-22602 and Zone Change Application 11-22, Activa Holdings, Baden, be received for information; and

THAT Council approve Zone Change Application 11/22 as set out in the draft by-law included as "Attachment B" to Report DS 2026-13; and

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

THAT the Director of Development Services, or delegate, be authorized to approve the draft plan and subsequent minor modifications to the draft plan, and to execute all necessary plans and documents required to register the subdivision plan and/or phases of the subdivision plan; and,

THAT upon registration of the subdivision, or any phases thereof, the Director of Development Services, or delegate, shall provide a report to Council summarizing any minor modifications made to the draft plan prior to the registration of the plan.

SUMMARY:

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

Public Meetings were held in July 2023 and April 2026. The application has seen minor revisions since first submission and subsequent to the most recent April Public Meeting.

Draft plan of subdivision 30T-22602 is comprised of approximately 25.492ha and is proposed to accommodate between 302-431 dwelling units in the form of single detached, townhouse, and other multiple dwellings. The plan includes a storm water management area, walkways and trails, and an open space area for passive use and environmental protection. Since the April public meeting, the previously proposed walking path along the south boundary of the development has been removed and replaced with an easement to secure overland drainage in the area. The easement is proposed to including landscaping/tree planting as an additional buffered transition between the existing and new development.

Zone change application 11/22 proposes amendments to the zoning by-law to implement the draft plan of subdivision. Development blocks neighbouring existing residential properties on the south side of the subject property are proposed to be zoned Zone 2b (Residential), which would permit single detached dwellings and accessory uses as currently permitted within that zone. Remaining development blocks are proposed to include street fronting, cluster and back-to-back townhomes as well as other multiples which may include apartments and stacked townhome units. Proposed zoning regulations are consistent with zoning regulations in other recently approved developments including the approved draft plan immediately to the west. Since the April public meeting, the previous proposed heights for the multiple blocks have been reduced from 6 storeys to a maximum of 4 storeys.

This report recommends approval of Zone Change Application 11/22 and Draft Plan of Subdivision 30T-22602. The zoning regulations together with the recommended conditions of draft approval, facilitate the logical and orderly development of the lands already designated for development in Baden.

BACKGROUND:

A Public Meeting was first held related to these applications on July 24, 2023 and a subsequent Public Meeting was held on April 13, 2026. The following is a summary of comments received prior to completion of this report.

Public

(complete comments are included as Attachment G)

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

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

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

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

John Will, Baden – comments at the July 2023 and April 2026 public meetings expressing concerns with width of the trail between the existing and new neighbourhood along with traffic concerns.

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

Alex Sooley, Baden – written comments and comments at the April 226 public meeting expressing concerns with financial impact on the community, density, prolonged construction activities, traffic, and adequacy of environmental studies.

Kevin Cross, Baden – concerned with traffic and density

Scott Dawson, Baden - concerned with traffic and density

Melissa Campbell, Baden – concerned with traffic and density and impact on infrastructure and community character

Dwayne Pretty and Amanda Walter, Baden – concerned with height, density and traffic

Agencies

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

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

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

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

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

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

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

REPORT:

The lands subject to these applications were added to the Baden Urban Area as part of the Township's Official Plan review and boundary rationalization process that was undertaken starting in 2017 and approved in April 2019 along with minor amendments to the boundary through Provincial approval of Bill 162 in May 2024.

Draft Plan of Subdivision 30T-22602

The following table highlights the evolution of draft plan of subdivision 30T-22602 plan from initial submission to the current plan recommended for approval.

July 2023 proposal	April 2026 proposal	June 2026 revisions
17.97ha	25.492ha (the plan now includes the wetland and woodland area as a block in the plan)	
300-375 dwelling units in the form of single detached, townhouse, and other multiple dwellings	303-433 dwelling units in the form of single detached, townhouse, and other multiple dwellings. The plan revised the block configuration between Street Four and Street 5 to reflect back-to-back townhouse units.	
The plan includes a storm water management area and an integrated trail network that will be interconnected with existing and future sidewalks, trails and walkways.	The plan continues to include the same features, but also includes an open space block (wetland and woodland area) to be conveyed to the Township.	
Drainage and Walkway block	Drainage Walkway block	Walkway removed and replaced with a 10m easement for overland drainage and the inclusion of landscaping.

The updated draft plan is included as Attachment A and proposed conditions of draft approval as Attachment C.

Zone Change Application 11/22

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

The remainder of the development blocks would be zoned Zone 2c, Zone 3, and Zone 4 to permit a mixture of single, street townhomes, back-to-back townhomes, and other multiples (such as cluster or stacked townhomes and apartments). Building setbacks remain consistent with other recently approved developments ensuring adequate ability to maintain properties through either sufficient width side yards, or reduced side yards with provisions for access easements. The implementation of reduced side yards and the resulting benefits to maximize parking opportunities was previously discussed and supported by Council within staff report DS-2025-09.

With respect to heights, the applicant has modified the proposal from that considered at the April public meeting to reduce the maximum building height allowed within the two multiple blocks (Blocks 15 and 16) from 6-storeys to 4-storeys.

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

The proposed zoning regulations are included as Attachment B.

The following paragraphs speak to themes of comments and concerns received through the public engagement process.

Housing forms, densities, and affordability

Policy 4.2 of the Township Official Plan speaks specifically to the need to provide a full range and mix of housing types, tenures and densities in all designations where residential land uses are permitted. The policy stipulates that in new developments on lands of 2 hectares or more, that a minimum of 30% of housing be in a form other than single and semi-detached dwellings. The policy further speaks to the need to address housing affordability in both ownership and rental.

The proposed development includes single detached dwellings, townhomes and other multiple residential buildings. Other multiple dwellings may include cluster townhomes, stacked townhomes, or traditional apartment buildings. The draft plan provides a unit range within each block identified to provide flexibility based on market demand at the time of construction. The tables provided on the draft plan identify the unit range and potential unit types within each block and development stage.

The proposed zoning identifies specific blocks for single detached dwellings which includes all blocks abutting the existing neighbourhood. Other blocks are proposed to be zoned to allow either single detached or street townhome units. The remainder of the blocks are proposed to allow multiple forms of housing – street front, cluster, back-to-back and stacked townhomes or apartment buildings. Combined, the multiple residential blocks and street townhome units will constitute at least 56% of the units within the development in turn achieving the targets of the Official Plan.

Township OP policy sets out that greenfield development will achieve an average minimum density of 45 people and jobs per hectare. This plan represents a minimum to maximum range of density of 45 to 65 people and jobs/hectare which is in keeping with the intent that the average across all greenfield development in the Township meet or exceed the densities established by the OP.

Providing a range of housing forms inherently provides a varying degree of affordability. The applicant proposes to further address affordability policies of the OP through either the construction of units within the development, the contribution towards an affordable housing development elsewhere in the Township, or through contributing \$500/dwelling unit within the plan to an affordable housing fund maintained by the Township of Wilmot. The proposed draft approval conditions include these options consistent with other recent draft approvals in the Township.

As noted in preceding paragraphs, the development plan has been modified to reduce the maximum height previously proposed for the two multiple residential blocks from 6-storeys to 4-storeys. Multiple storey buildings do not equate to increased affordability nor do they present an issue with land use compatibility. That said, maintaining multiple forms of housing does provide options for future owners and those looking to move from one form of housing to

another and can foster affordability options. The applicant has included a height reduction with their submission given it does not impede the opportunity to still provide a range of housing forms and in an effort to address perceived concerns with building heights.

Parkland and trails

The subdivision plan includes trail interconnections to fully link the homes with neighbouring parks, schools and trail and sidewalk infrastructure. The proposed draft plan in the context of existing and planned abutting residential development, with colours added to illustrate the trails, parks and other lands uses, is included as Attachment F.

Concerns were raised from residents about the adequacy of the width of the trail block along the south boundary of the development and the ability to support both a trail, overland drainage and landscaping. Upon further review, it was determined that a maintenance access was not required given the nature of the overland drainage and depth of the swale. The proximity of municipal streets and sidewalks that will run parallel to the previously proposed trail provides adequate connectivity and as such the trail has been eliminated from the plan. A 10.0m wide easement is maintained to secure the shared drainage over multiple properties and the width will accommodate tree planting and other landscaping to serve as a natural separation and transition between neighbourhoods.

Traffic and parking

A traffic study was completed for the development by Paradigm Engineering. The study looked at intersection controls, traffic distribution, traffic calming, and active transportation and trail linkages through the development and adjoining neighbourhoods.

Some concerns were expressed regarding the timing of data collection used in support of the study preparation. Paradigm observed turning movement counts for the intersection of Snyder's Road at Foundry Street/Livingston Boulevard from 2024, and Snyder's Road West intersections of Livingston Boulevard (west leg) and Christian Street from 2020. All three intersections were factored to a 2025 base year condition using the previously used 1.50% per annum growth rate, then balanced accordingly with the Foundry Street/Livingston Boulevard intersection. Current turning movement counts could not be collected due to prolonged closure of the Snyder's Road and Foundry Street/Livingston Boulevard intersection in 2025. Paradigm adjusted their data to reflect current conditions and used an updated count as available. The findings of the traffic study are valid.

The traffic study was reviewed and accepted by the Township and its third-party traffic consultant and was ultimately reviewed and approved by the Region of Waterloo as it relates to access to Snyder's Road West primarily through the adjacent draft approved subdivision.

The proposed development plan continues to provide for multiple points of access to and from the subdivision, as was always the intent. Road stubs exist at both Jacob Cressman Drive and Isaac Shantz Drive to allow for full neighbourhood integration and are intended to provide options for traffic distribution. Connection into the existing development will help move traffic to and from the both the existing Baden Public School and future new Catholic Elementary School, for both existing residents and future residents, and provide multiple opportunities to reach Snyder's Road West so as to not overload any one route.

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

Opinions were provided that any additional traffic on Jacob Cressman Drive and Isaac Shantz Drive will be problematic and cause for concern. Certainly the findings of the TIS would not support those claims. The intent is to provide multiple options for traffic flow and connectivity. Should a significant number of drivers choose to utilize Isaac Shantz Drive for example, typically other drivers would move to other routes to take the path of least resistance. The intent is that by establishing Street One as a collector road linking to Snyder's Road West, it will provide a preferred route for traffic. That said continued use of both Jacob Cressman Drive and Isaac Shantz Drive is appropriate and was fully intended to occur through progression of development to the north.

To address perceived traffic concerns related to vehicles passing through the existing Activa development, the applicant has provided a number of proposed traffic calming measures designed to slow traffic and encourage use of Street One as opposed to Jacob Cressman Drive and Isaac Shantz Drive. These measures are included as Attachment E and the requirement to construct at the outset of the development is included within the proposed draft approval conditions.

Parking

The recommended draft approval conditions and associated zoning account for both on-street and off-street parking within this development. Significant efforts have been made towards reviewing the needed municipal right-of-way that supports on-street parking, traffic and infrastructure. It is anticipated that the right-of-way will include travelled lanes independent from on-street parking to allow safe movement of emergency vehicles, snow clearing equipment, automobiles and shared space for cyclists. On-street parking areas may be limited to one side of the street where necessary based on the number and frequency of accesses. It is anticipated that road will include curb "bump-outs" that narrow the road, slow traffic, and break up the width of the road where on-street parking is provided. Ultimately the final right-of-way cross-section will be finalized through the detailed engineering and design review, but will incorporate the above objectives.

With respect to off-street parking, the number and location of parking spaces is regulated by the Zoning By-law. The proposed zoning remains consistent with existing regulations requiring 2 parking spaces per unit for singles and street fronting townhomes. Similar to zoning regulations utilized within the development of the narrower singles on Captain McCallum Drive, for lots with a width of less than 11m, the minimum driveway depth is proposed to be 9m. This additional length (increased from the standard 6 or 7.6m setback) will accommodate two average length cars. While an off-street parking space would be available within the garage, experience would suggest that garages are more often utilized for storage of personal items as opposed to a parking space. As such, if garages are utilized for parking, in theory the 9m driveway and garage space on narrow singles and street fronting towns would provide for three parking spaces. This 9m driveway has proven to be effective on Captain McCallum Drive

and is consistent with recent Wilmot Township approval and other jurisdictions, specifically the Township of Woolwich.

With respect to other multiples, the parking regulations for apartments/stacked townhomes are proposed at 1.2 spaces per unit representing a small reduction from the current zoning requirement of 1.5 spaces per unit. For cluster townhome developments, the ratio is proposed to be reduced from 2 spaces to 1.5 spaces per unit. It is anticipated that these parking ratios will be effective for the type of housing proposed and ultimately are consistent with or exceed ratios within other jurisdictions and align with recent Township approvals in other new developments.

Infrastructure

This development will rely on the Baden trunk sewer to deliver sanitary effluent to the Baden pumping station and ultimately to the Baden-New Hamburg wastewater treatment facility. This trunk sewer is anticipated to be complete later this year with the final phase of construction presently underway. The development will gain access to the trunk sewer through planned servicing work to occur as part of the development to the west.

Sufficient capacity exists from both a water and wastewater perspective to service this development. Services are installed through a combination of developer-funded works, upper level government funding, and development charges. Capacity will be reserved through a servicing agreement with the Region of Waterloo. The Region, in consultation with the Township, reviews the appropriateness of a request at the time an application is made for a servicing agreement and also includes monitoring of future continued commitment to capacity should a development not proceed within the timelines anticipated. Draft approval conditions of the Region reflect this servicing capacity framework.

Public comments and concerns

Public comments are included as Attachment G. The comments, questions, and concerns raised in these submissions have been addressed through the preceding detailed paragraphs organized by themes that align with the comments received. Comments are further addressed through accompanying zoning regulations and the subdivision's draft approval conditions.

Summary

Through the review of detailed supporting documentation and as summarized within this report, staff support the approval of the applications.

The recommended draft approval conditions address matters of municipal interest and combined with the recommend zoning, provide for the logical and orderly development of the municipality in accordance with the goals and objectives of the Township Official Plan.

ALIGNMENT WITH THE TOWNSHIP OF WILMOT STRATEGIC PLAN:

Prosperous Businesses & Balanced Growth

FINANCIAL CONSIDERATIONS:

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

As part of the Township's planned long term financial strategy and asset management planning, understanding long term maintenance and replacement costs will ensure that reserve fund contributions over the long term will fund future financial costs without an increased burden on existing and new residents.

ATTACHMENTS:

Attachment A	Proposed draft plan of subdivision
Attachment B	Proposed zoning regulations
Attachment C	Township draft approval conditions
Attachment D	Region of Waterloo draft approval conditions
Attachment E	Proposed traffic calming measures
Attachment F	Parks, trails, and other land uses
Attachment G	Public comments

DRAFT PLAN OF SUBDIVISION

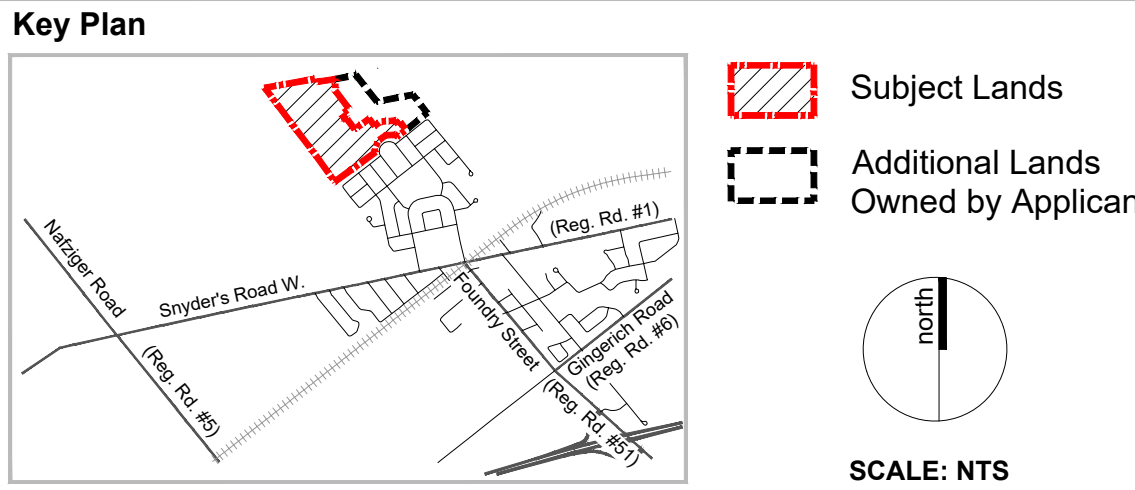
Legal Description
PART OF LOTS 14 AND 15,
CONCESSION NORTH OF SNIDER'S ROAD
TOWNSHIP OF WILMOT
REGION OF WATERLOO

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

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

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

Date: May 28, 2026
Jason Finch, OLS
(Stantec Geomatics Ltd.)



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

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

Area Schedule 30T-22602				
Description*	Blocks	Units (min/max)	% of Unit Total	Area (ha)
Residential (Singles, Street Towns, Back to Backs)**	1-14	186-276	61-64	7.423
Multiple Residential (Townhomes)***	15,16	117-157	39-36	3.536
Stormwater Management Facility	17			2.478
Open Space	18			7.447
Hydro Corridor	19			0.721
Trail	20, 21			0.112
Walkway	22			0.045
0.3m Reserves	23-28			0.010
Roads				3.720
Total	28	303-433	100%	25.492

*Blocks shown on Draft Plan are 'Residential' unless otherwise specified.
** Unit yield:
Z2b Zone - Minimum unit yield is based on a lot width of 13.11 m (43 ft) (Blocks 1,3,4,7,12,13,14,15)
- Maximum unit yield is based on a lot width of 10.97 m (36 ft)
Z2c Zone - Minimum unit yield is based on a lot width of 13.11 m (36 ft) (Blocks 2,8,9,10,11)
- Maximum unit yield is based on a lot width of 5.5 m (18 ft)
Z3 Zone - Blocks 5 and 6 assumes Back to Back freehold townhomes for minimum and maximum units based on Concept Plan.
*** For the Multiple Residential blocks the number of units assumes Concept Plans (Cluster Townhomes).

Notes
1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE SHOWN.
2. A PORTION OF THE SITE BOUNDARY AND LEGAL BASE PLAN PREPARED BY STANTEC GEOMATICS LTD.
3. TOPOGRAPHIC AND EXISTING FEATURES SURVEY COMPLETED BY STANTEC.
4. ADJACENT PARCEL FABRIC IS FROM REGION OF WATERLOO OPEN DATA AND IS APPROXIMATE.
5. WETLAND AND CORE ENVIRONMENTAL FEATURE LIMITS FROM STANTEC, CONFIRMED/SURVEYED AUG. 20, 2020.

7.	May. 28, 2026	For re-submission to Region of Waterloo/Township of Wilmot;	CT
6.	Jan. 9, 2026	For re-submission to Region of Waterloo/Township of Wilmot;	DGS
5.	Oct. 1, 2025	For re-submission to Region of Waterloo/Township of Wilmot;	DGS
4.	Jun. 3, 2024	For re-submission to Region of Waterloo/Township of Wilmot;	DGS
3.	May 2, 2023	For re-submission to Region of Waterloo/Township of Wilmot;	DGS
2.	Sept. 12, 2022	For submission to Region of Waterloo/Township of Wilmot;	DGS
1.	Nov. 19, 2019	For Pre-application meeting with Region of Waterloo;	DGS

Rev. No. Date Issued / Revision

By

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

Approval Stamp	Date	May 28, 2026
	File No.	8784BB
	Plan Scale	1:1,500 (24x36)
	Drawn By	DGS/CT
Project	Baden Lands	
Applicant	Checked By PC	

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

Scale Bar
0 10 25 50 75 100 125 150m

File Name DRAFT PLAN OF SUBDIVISION

THE CORPORATION OF THE TOWNSHIP OF WILMOT

BY-LAW NO. 2026-XX

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.

BE IT THEREFORE ENACTED by the Council of the Corporation of the Township of Wilmot 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 2b (Residential), Zone 2c (Residential), Zone 4 (Residential), Zone 11 (Open Space), and Zone 1 (Agricultural).
2. Notwithstanding the provisions of By-law 83-38, as amended, the map forming Part 2a 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 this By-law.

Notwithstanding the provisions of By-law 83-38, as amended the following shall be added as Section 22.320.

Notwithstanding any other provisions of this By-law, the lands described as Part of Lot 14 and 15, Concession North of Snyder's Road, identified as Section 22.320 on the map forming Part 2a of Schedule 'A' and zoned Zone 2b shall be subject to the following additional and/or modified regulations:

- a) the minimum lot area shall be 327 square metres
- b) the minimum lot frontage and width shall be 10.9m for an interior lot and 12m for a corner lot
- c) the minimum front yard setback for the habitable and uninhabitable (garage) portion of a building, 6m notwithstanding:
 - i) that at no point shall the uninhabitable portion of the dwelling be closer to the front lot line than the habitable portion of the dwelling;
 - ii) that the habitable portion of the dwelling may include a useable covered front porch;
 - iii) on lots with a width of less than 10.9m, the garage shall be setback a minimum of 9m from the front lot line; and

- iv) where the front yard setback for the uninhabitable (garage) portion of the dwelling is a minimum of 9m, the minimum front yard setback for the habitable portion of the dwelling shall be 3.5m
- d) the minimum side yard setback shall be 1.2m notwithstanding:
 - i) a side yard setback, adjacent to a lot line with a 1.2m side yard setback on the adjacent lot, may be reduced to 0.6m only if an access and maintenance easement has been secured over the 1.2m side yard setback in favour of the 0.6m side yard
- e) the minimum exterior side yard setback shall be 3.5m
- f) the minimum rear yard setback shall be 6.0m
- g) the maximum lot coverage of all buildings on a lot shall be 55%
- h) the maximum lot coverage for accessory buildings shall be in conformity with Section 6.3, provided the combined lot coverage of main and accessory buildings does not exceed 55%
- i) the maximum building height shall be 12m.

Notwithstanding any other provisions of this By-law, the lands described as Part of Lot 14 and 15, Concession North of Snyder's Road, identified as Section 22.230 on the map forming Part 2a of Schedule 'A' and zoned Zone 2c shall be subject to the following additional and/or modified regulations:

- a) a "Residential Building – Street Townhouse" shall be an additional permitted use
- b) the minimum front yard setback for the habitable and uninhabitable (garage) portion of a building shall be 6m notwithstanding:
 - i) that at no point shall the uninhabitable portion of the dwelling be closer to the front lot line than the habitable portion of the dwelling;
 - ii) that the habitable portion of the dwelling may include a useable covered front porch;
 - iii) on lots with a width of less than 10.9m, the garage shall be setback a minimum of 9m from the front lot line; and
 - iv) where the front yard setback for the uninhabitable (garage) portion of the dwelling is a minimum of 9m, the minimum front yard setback for the habitable portion of the dwelling shall be 3.5m
- c) the minimum side yard setback shall be 1.2m
- d) the minimum exterior side yard setback shall be 3.5m
- e) the minimum rear yard setback shall be 7.5m
- f) the maximum lot coverage of all buildings on a lot shall be 55%
- g) the maximum lot coverage for accessory buildings shall be in conformity with Section 6.3, provided the combined lot coverage of main and accessory buildings does not exceed 55%
- h) the maximum building height, 12m
- i) "Residential Building – Single Detached" specific regulations:
 - i) the minimum lot area shall be 270 square metres
 - ii) the minimum lot frontage and width shall be 9m for an interior lot and 12m for a corner lot
- j) "Residential Building – Street Townhouse" specific regulations:

- i) the minimum lot area shall be 165 square metres
- ii) the minimum lot frontage and width shall be 5.5m for an interior lot and 8.5m for a corner lot.

Notwithstanding any other provisions of this By-law, the lands described as Part of Lot 14 and 15, Concession North of Snyder's Road, identified as Section 22.230 on the map forming Part 2a of Schedule 'A' and zoned Zone 3 shall be subject to the following additional and/or modified regulations:

- a) "Residential Building – Back-to-Back Townhouse" shall be an additional permitted use and subject to the following additional and/or modified regulations:
 - i) the minimum lot area shall be 80 square metres
 - ii) the minimum lot frontage and width shall be 6m for an interior lot and 8.5m for a corner lot
 - iii) the minimum front yard setback for the habitable and uninhabitable (garage) portion of a building, 6m notwithstanding:
 - a) that at no point shall the uninhabitable portion of the dwelling be closer to the front lot line than the habitable portion of the dwelling;
 - b) that the habitable portion of the dwelling may include a useable covered front porch;
 - c) on lots with a width of less than 10.9m, the garage shall be setback a minimum of 9m from the front lot line; and
 - d) where the front yard setback for the uninhabitable (garage) portion of the dwelling is a minimum of 9m, the minimum front yard setback for the habitable portion of the dwelling shall be 3.5m
 - iv) the minimum side yard setback shall be 1.2m for a building with 2 storeys or less and 3.0m for a building with more than 2-storeys
 - v) the minimum exterior side yard setback shall be 3.5m
 - vi) the minimum rear yard setback shall be 0m
 - vii) the maximum building height shall be the greater of 15m or 4 storeys
 - viii) the maximum lot coverage shall be 60%
 - ix) the minimum outdoor amenity area shall be 7 square metres
 - x) the maximum number of attached units shall be 16

Notwithstanding any other provisions of this By-law, the lands described as Part of Lots 14 and 15, Concession North of Snyder's Road, identified as Section 22.230 on the map forming Part 2a of Schedule 'A' and zoned Zone 4 shall be subject to the following additional and/or modified regulations:

- a) a "Residential Building – Townhouse" shall be an additional permitted use
- b) the minimum number of off-street parking spaces shall be:
 - i) "Residential Building – Apartment": 1.2 spaces per dwelling unit
 - ii) "Residential Building – Cluster Townhouse" and "Residential Building – Back-to-Back Townhouse": 1.5 spaces per dwelling unit
 - iii) "Residential Building – Street Townhouse": 2 spaces per dwelling unit
- c) the maximum building height main building shall be the greater of:

- i) "Residential Building – Apartment", "Residential Building – Cluster Townhouse" and "Residential Building – Back-to-Back Townhouse": 15m or 4-storeys
 - ii) "Residential Building – Street Townhouse": 12m or 3-storeys
 - d) the minimum front yard setback shall be:
 - i) "Residential Building – Apartment", "Residential Building – Cluster Townhouse", "Residential Building – Back-to-Back Townhouse: 6m
 - ii) "Residential Building – Street Townhouse": 6m for the habitable and uninhabitable (garage) portion of a building notwithstanding:
 - (a) that at no point shall the uninhabitable portion of the dwelling be closer to the front lot line than the habitable portion of the dwelling;
 - (b) that the habitable portion of the dwelling may include a useable covered front porch;
 - (c) on lots with a width of less than 10.9m, the garage shall be setback a minimum of 9m from the front lot line; and
 - (d) where the front yard setback for the uninhabitable (garage) portion of the dwelling is a minimum of 9m, the minimum front yard setback for the habitable portion of the dwelling shall be 3.5m
 - e) the minimum interior side yard setback shall be 3.0m or half the building height, up to a maximum of 12m
 - f) the minimum exterior side yard setback shall be 3.5m
 - g) the minimum rear yard setback shall be 6.0m
 - h) the maximum lot coverage of all buildings on a lot shall be 60%
 - i) the maximum lot coverage of all accessory buildings shall be in conformity with Section 6.3, provided the combined lot coverage of main and accessory buildings does not exceed 60%
 - j) "Residential Building – Apartment" specific regulations:
 - i) the minimum lot frontage and width shall be 30m
 - ii) an "Amenity Area" shall be defined as the area of the lot or block not occupied by buildings, parking and driveway areas which may include patios and landscaped areas on the site, swimming pools and other outdoor areas which can be used for recreational purposes, the area devoted to the private outdoor balconies and the floor area devoted to the indoor entertainment, social and/or recreational common rooms.
 - iii) the minimum amenity area shall be 30 square metres per dwelling unit
 - k) "Residential Building – Cluster Townhouse" and "Residential Building – Back to Back Townhouse" specific regulations:
 - i) Minimum lot frontage, 20m
3. 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.
4. 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, Second, Third and Final time and passed this 22nd day of June, 2026.

MAYOR – Natasha Salonen

CLERK – Amelia Jaggard

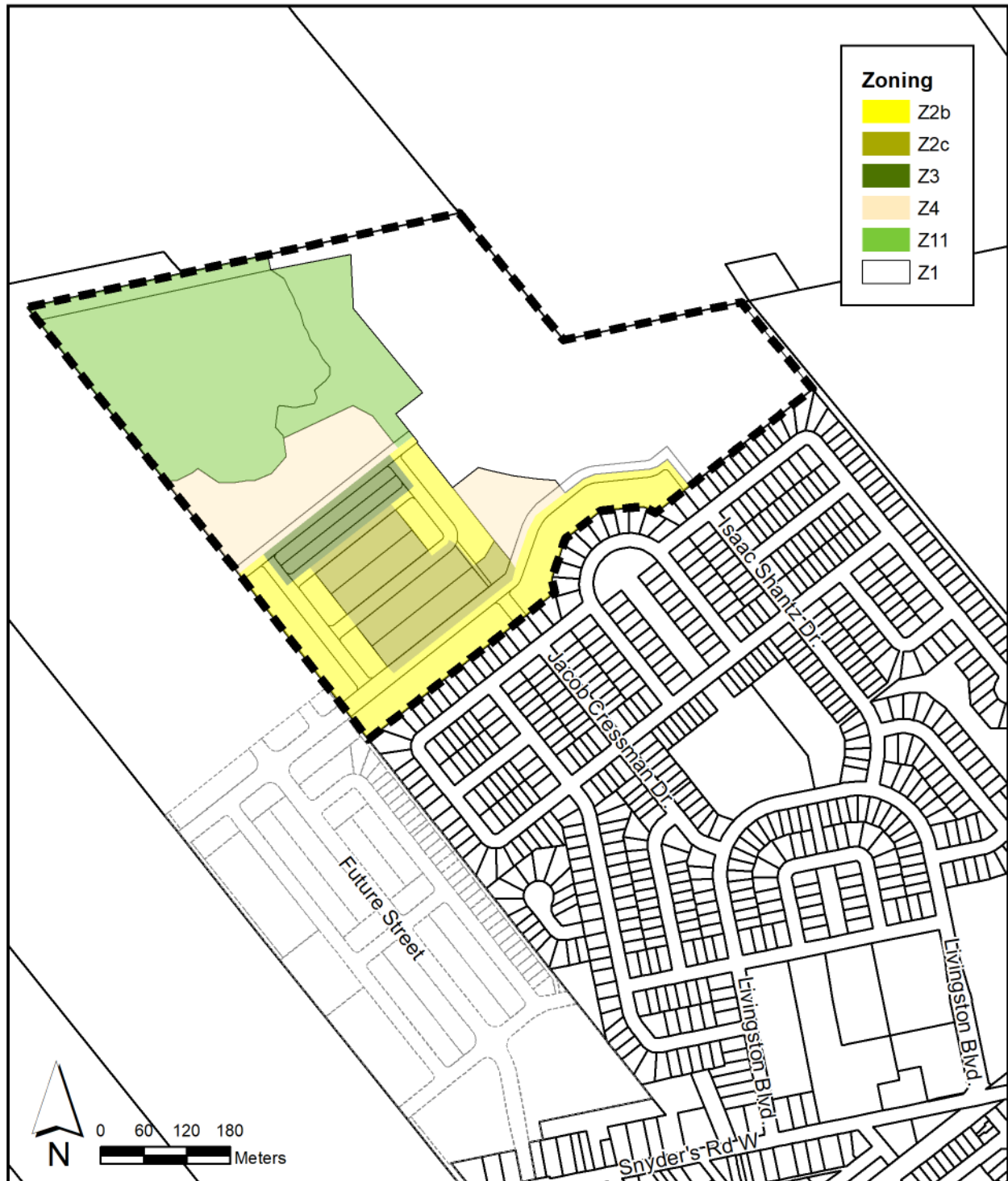
Authority: Council Resolution 2026-
Staff Report Number: DS-2026-13
Staff Report Date: June 22, 2026

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 14 and 15, Concession North of Snyder's Road, in the said Township of Wilmot.

SCHEDULE "B"
PART OF LOT 14 AND 15
CONCESSION NORTH OF SNYDER'S ROAD
TOWNSHIP OF WILMOT

SUBJECT LANDS OUTLINED THUS: - - - - -



Report DS 2026-13

Attachment C: Township Draft Approval Conditions

The following, organized under the headings Conditions, Clearances, and Notes together form the Township of Wilmot's draft approval conditions as referenced within the recommendation of report DS 2026-13

Conditions

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

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

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

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

5. That the following shall be conveyed to the Township of Wilmot for the purposes stated therein, at no cost and free and clear of all encumbrances:
 - a) Block 17 for stormwater management purposes.
 - b) Block 18-19 for open space purposes.
 - c) Block 20-22 for trail and/or walkway purposes.
 - d) Blocks 23-28 for 0.3m reserves.
 - e) Street One, Street Two, Street Three, Street Four, and Street Five as municipal roads.
 - f) A 10.0m easement through Blocks 1 and 11 for overland drainage and a landscape buffer.
 - g) Condition 5b and 5c shall constitute the required conveyance in accordance with Section 51.1(1) of the Planning Act, R.S.O. 1990, c. P.13, as amended.
6. That the Subdivider shall enter into a subdivision agreement with the Township which will cover all planning and engineering aspects of the development and identify in detail applicable Township standards and specifications relative to municipal services. The agreement will further address all requirements, financial and otherwise of the Township of Wilmot concerning the provision of roads and the installation of services, facilities and drainage, landscaping, the payment of fees and provision of financial securities and deposits to ensure the proper and orderly completion of the development.
7. That prior to undertaking detailed engineering design for the subdivision, the Subdivider shall provide design guidelines to the satisfaction of the Township, addressing at minimum the following:
 - a) That, wherever possible, driveways to be paired to allow greater opportunities for on-street parking.
 - b) Promote a detailed design strategy that minimizes the need for swales/drainage features on one side of a dwelling in an effort to allow unobstructed side entrances and pathways to the rear of the property. This may include consideration of pairing drainage swales on one side of the dwelling.
 - c) Stipulate that mechanical equipment (air conditioner, heat pumps etc.) be provided at the rear of the dwelling or within the same side as paired drainage solutions identified in item (b).
 - d) Design the subdivision to eliminate the need for retaining walls whenever feasible.
 - e) Design multiple blocks such that front entrances face the municipal street and that back lotting be avoided.
 - f) Include traffic calming measures on municipal streets such as raised intersections and trail crossings, boulevard bump outs within parking lanes to intermittently narrow the street etc.
8. That no grading or site alteration shall occur until such time as the subdivision agreement has been registered, and all approvals (municipal or otherwise) have been granted related to said grading or site alteration to the satisfaction of the Township.

9. That prior to any grading or construction on site and prior to registration of the plan, the owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority and the Township of Wilmot:
 - a) A detailed storm water management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual";
 - b) A detailed Lot Grading, Servicing and Storm Drainage Plan;
 - c) An Erosion and Siltation Control Plan in accordance with the Grand River Conservation Authority's Guidelines for sediment and erosion control, indicating the means whereby erosion will be minimized and silt maintained on-site throughout all phases of grading and construction; and,
 - d) The submission and approval of a Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Permit from the GRCA (if required) prior to grading in a regulated area and/or construction of the Stormwater Management outlet in a regulated area.
10. That the Subdivider agrees to complete and maintain the works in accordance with the approved plans and reports noted in Condition 9, above.
11. That prior to commencement of area grading or site servicing within the development, the Subdivider shall confirm that a legal outlet for post-development stormwater flows has been secured to the satisfaction of the Township.
12. That prior to commencement of area grading, where use of lands abutting the subdivision is required (for grading or access), the Subdivider shall provide written authorization from the land owner for such work occur.
13. That prior to registration of the plan (or the first stage if staging is approved) the Subdivider shall confirm that a legal outlet for sanitary sewer flows has been secured to the satisfaction of the Township.
14. The Subdivider agrees to obtain and comply with all necessary Provincial, Regional, Township, and GRCA approvals with respect to sanitary sewer, watermain, and stormwater management works.
15. That prior to registration, the Subdivider shall make satisfactory arrangements with Enova Power Corp for the provision of permanent electrical services to the plan, with all electrical servicing within the plan be underground unless deemed not feasible by Enova, and that wood poles will not be utilized within the plan.
16. The Subdivider further agrees that should permanent installations be impractical at the time, to pay all costs incurred through the provision of temporary electrical services and the removal of such services when permanent installations are possible.
17. That street lighting shall be provided at the owner's expense in accordance with the standards and specifications of the Township of Wilmot, the Region of Waterloo and Enova Power Corp.

18. That prior to registration, the Subdivider agrees to make satisfactory arrangements with a telecommunications provider for the provision of permanent or temporary telecommunication services to this plan.
19. That prior to registration, the Subdivider agrees to make satisfactory arrangements with Enbridge Gas Inc. for the provision of necessary easements and/or agreements for the provision of gas services to this plan.
20. That prior to or concurrent with the registration of any Stage the Subdivider shall grant any easements required for utility or municipal servicing purposes to the appropriate authority.
21. That the Subdivider shall provide a master utility locate plan for hydro (including street lights) and all other utilities prior to final approval of the detailed engineering. The Subdivider's engineer is responsible to review the utility submission to ensure there are no conflicts with sewer, watermains, driveways, sidewalks, multi-use trails, boulevard trees, and signage. At such time as the Subdivider's engineer has reviewed the utility drawings a clearance letter is to be provided to the Township for each utility.
22. That prior to registration, the Subdivider agrees to make satisfactory arrangements with Canada Post and the Township of Wilmot for the provision of necessary easements for the provision of mail services to this plan in a form satisfactory to the Township of Wilmot.
23. That the Subdivider shall indicate to prospective purchasers in all offers of purchase and sale that mail delivery will be from a designated centralized mailbox and, that the location of the centralized mailbox shall be determined prior to the closing of any home sale to the satisfaction of Canada Post and the Township of Wilmot.
24. That prior to registration, the Subdivider shall satisfy all of the following requirements to the satisfaction of the Waterloo Region District School Board (WRDSB):
 - a) That the Owner/Developer must agree in the Subdivision Agreement and/or Site Plan Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease:
 - i) "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school."
 - ii) For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information.
 - iii) "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained rights-of-way to pick up and drop off students,

and so bussed students will be required to meet the bus at a congregated bus pick-up point."

- b) That the Owner/Developer supply, erect and maintain a sign (at the Owner/Developer's expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner/Developer shall submit a photo of the sign for review and approval of the WRDSB.

25. That prior to registration, the Subdivider shall satisfy all of the following requirements to the satisfaction of the Waterloo Catholic District School Board (WCDSB):

- a) That the Owner/Developer and the WCDSB reach an agreement regarding the supply and erection of an advisory sign, at the Owner/Developer's expense and according to the WCDSB's specifications, advising prospective residents about the WCDSB's Holding Zone designation applied to the subject property.
- b) That the Owner/Developer shall include the following wording in the subdivision agreement and any future site plan agreement and/or condominium declaration to advise all purchasers of residential units and/or renters of the same:
 - i. "Waterloo Catholic District School Board present and future families—please note that your new home is located in an area that has been designated as a Holding Zone as we await construction of new school(s) or additional capacity. Students may be accommodated temporarily in a Holding School(s). Please visit www.wcdsb.ca/accommodations for additional information."
- c) That the developer shall include the following wording in the subdivision agreement to advise all purchasers of residential units and/or renters of same:
 - i. "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained rights-of-way to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."
- d) That any Education Development Charges shall be collected prior to the issuance of building permit(s).

26. That prior to registration, the Subdivider shall satisfy all of the following requirements of Hydro One Networks Inc. (HONI):

- a) Prior to HONI providing its final approval, the developer must make arrangements satisfactory to HONI for review and approval of lot grading and drainage plans identifying the transmission corridor, location of towers within the corridor and any proposed uses within the corridor and confirming drainage is controlled and does not impact the transmission corridor.
- b) Any development in conjunction with the subdivision must not block vehicular access to any HONI facilities on the transmission corridor. During construction, there must be no storage of materials or mounding of earth, snow or other debris in the transmission corridor.
- c) At the Subdivider's expense, temporary fencing must be placed along the transmission corridor prior to construction and permanent fencing must be erected where subdivision lots directly abut the transmission corridor after construction is completed.

- d) The costs of any relocations or revisions to HONI facilities which are necessary to accommodate this subdivision will be borne by the Subdivider. The Subdivider will be responsible for restoration of any damage to the transmission corridor or HONI facilities thereon resulting from construction of the subdivision.
- e) HONI's easement rights must be protected and maintained.
- f)
- 27. That the Subdivider shall submit a landscaping plan prepared by a qualified landscape architect for the 10.0m easement referenced in Condition 5f, the walkway and trail blocks, the open space blocks, and the stormwater management block to the satisfaction of the Township. The approved landscape plan shall set out the location of all pathways and sidewalks, the ground cover for each block, lighting, plantings, and fencing/bollard requirements and shall form a part of the subdivision agreement between the Township and the Subdivider.
- 28. That a qualified landscape architect shall provide a document outlining the landscaping specifications, along with tree species, planting locations, and maintenance requirements for all trees planted within boulevards and lands to be conveyed to the Township. This document shall be prepared in consultation with Appendix C of the Township Tree Canopy Policy Framework 2023 and to the satisfaction of the Township.
- 29. That the Subdivider shall landscape the blocks and boulevards as required by Conditions 27 and 28 in accordance with the approved plans and documents for each phase.
- 30. That the Subdivider agrees to construct at the same time as all other road works within the plan (or within the first stage if staging is approved), traffic calming measures on Isaac Shantz Drive and Jacob Cressman Drive, that may include those measures listed in Condition 7f, to the satisfaction of and in partnership with the Township of Wilmot.
- 31. That the Subdivider agrees to construct, in accordance with the approved plans and within the timeframe and financing schedule outlined below, works within the 10.0m easement referenced in Condition 5f, the open space, walkway, and trail blocks, as set out in the approved plans to the satisfaction of the Township.
 - a) Grading, topsoiling and seeding shall be completed prior to occupancy of the first unit within the stage within which the open space, walkway or trail blocks are located or in the event of winter conditions by June 1st immediately following the issuance of the first occupancy permit.
 - b) Construction of the landscaping within 10.0m easement referenced in Condition 5f and trails within the open space, walkway, and trail blocks shall be completed within one year of registration or servicing the stage within which such blocks are located, whichever occurs first.
 - c) The applicable costs associated with works in the 10.0m easement referenced in Condition 5f, the open space, walkway and trail blocks, such as trail construction, grading, topsoiling, seeding, sodding, landscaping, servicing, signage in accordance with the approved plans shall be paid for by the Subdivider.
- 32. That further to Condition 31:

- a) The Subdivider, in partnership with the owner of the lands immediately to the west, and at no cost to the Township, shall construct an asphalt 3.0m multi-use trail (MUT) through the 3.0m wide Block 20 and 21 and the abutting 3.0m on lands to the west.
 - b) The Subdivider shall construct a 3.0m wide MUT (surface to be determined through detailed design) through Block 17 and 18 linking Block 20 to Street 5.
 - c) The Subdivider, at their cost, shall construct an asphalt 3.0m MUT through Block 22.
33. That the Subdivider shall design the stormwater management blocks including municipal trails within or abutting the stormwater management block, in accordance with the approved plans prior to the first registration. When trails within or abutting stormwater management blocks serve a combined function for maintenance access, the trails shall be constructed to the standard required for maintenance access or a minimum of 3.0m wide, whichever is greater.
34. That sidewalks on all streets shall be constructed to the standard, in the location and of the width specified by the Township of Wilmot.
35. That all blocks to be conveyed to the Township of Wilmot shall be fenced or otherwise appropriately delineated to the satisfaction of the Township.
36. That all offers of purchase, sale, or lease for single detached, semi-detached, or street fronting townhome dwellings, shall include the following clause and that, prior to occupancy, the Subdivider or subsequent builder be required to conspicuously post this clause on the inside of the overhead garage door:

"Parking

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

Site alterations

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

37. That the Subdivider agrees to provide all prospective purchasers with a copy of the grading control plan and a copy of the subdivision agreement.

38. That all streets, including the approved entrance locations to lots/blocks, shall be constructed by the Subdivider in accordance with the specifications and requirements of the Township.
39. That the detailed engineering design include an entrance and on-street parking location plan to the satisfaction of the Township of Wilmot including all entrance locations, widths, and surface treatments.
40. That the streets shall be named to the satisfaction of the Township of Wilmot and said names shall be assigned by the Township of Wilmot, in consultation with the Region of Waterloo, within the Subdivision Agreement and identified on the subdivision plan prior to registration.
41. That, prior to issuance of building permits, the Subdivider shall pay for and install all regulatory street signs.
42. That the Subdivider shall indicate to prospective purchasers in all offers of purchase and sale that mail delivery will be from a designated centralized mailbox and, that the location of the centralized mailbox shall be determined prior to the closing of any home sale.
43. That the Subdivider shall ensure the provision of a potable water supply to each lot to the satisfaction of the Township of Wilmot and Region of Waterloo.
44. That the access and egress for all construction traffic, for the life of the development, shall be from Snyder's Road West by way of draft approved subdivision 30T-21601 or an alternate location to the satisfaction of the Township.
45. That the Subdivider shall erect a sign at the entrance to the subdivision in a location satisfactory to the Township at the Subdivider's expense, which identifies all blocks within the approved plan of subdivision and which identifies the zoning and use of each block. The sign shall also identify the location of the construction access. The design of the sign shall be submitted to the Township of Wilmot for approval prior to its erection. The Subdivider shall be responsible to obtain a building permit for said sign if a permit is required. Upon completion of the subdivision the sign shall be removed at the expense of the Subdivider.
46. That a maximum of 3 single detached model home units and 2 model home townhome blocks may be constructed prior to registration of the development provided that no residential occupancy of any model home may be permitted until such time as the subdivision plan is registered.
47. That no development (except area grading authorized by a subdivision agreement) shall occur within Block 15 or 16 until site plan approval has been granted by the Township.
48. That prior to release of the plan for registration, the Subdivider shall pay all legal fees incurred by the Township related to the processing and approval of the plan.

49. That prior to registration of the subdivision agreement and prior to release of the plan for registration, the Subdivider shall pay the Township Development Services subdivision registration fee in accordance with the Township Fees and Charges By-law.
50. That prior to the release of the plan for registration, the Subdivider shall pay the Township Infrastructure Services subdivision review administration fee and subdivision drawing and construction review fees in accordance with Township Fees and Charges By-law.
51. That the Subdivider agrees to pay the development charge in force at the time of building permit issuance at the time prescribed by the Development Charges Act, 1997, S.O. 1997, c. 27, as amended.
52. That the Subdivider agrees to contribute to affordable housing within the Township by:
 - a) Contributing directly to an affordable housing project approved for development within the Township of Wilmot in an amount no less than \$500 per residential unit in the plan, or
 - b) Constructing affordable housing units with the plan, or
 - c) Providing an affordable housing contribution to the Township of Wilmot for each residential unit developed within the plan, which contribution will be paid and used in accordance with the following:
 - i) the affordable housing contribution shall be \$500 per residential unit, regardless of unit type, and shall not be subject to indexing or any other increase;
 - ii) the affordable housing contribution is payable for each residential unit in the plan, and shall be collected by the Township, at the time of issuance of a building permit for the unit(s);
 - iii) the affordable housing contribution shall not be payable in respect of any subsequent secondary/accessory units or suites within a single detached, semi-detached or townhouse unit, or in respect of any non-residential development;
 - iv) the affordable housing contributions paid by the Subdivider will be used by the Township toward the capital costs of a planned affordable housing project that is otherwise fully funded and approved, and may be given by the Township to a not-for-profit affordable housing corporation for that purpose or used by the Township to acquire land to be conveyed to such a corporation for that purpose; and
 - v) the payment of the affordable housing contribution by the Subdivider pursuant to this condition shall be in full satisfaction of any and all requirements respecting the contribution to or provision of affordable or social housing in respect of the development of the lands within the plan, and, for greater certainty, the lands shall not be subject to any inclusionary zoning by-law and the Subdivider shall be exempt from any development charge imposed by the Township in respect of affordable or social housing.
53. That subject to Conditions 1 to 52 herein, the Subdivider shall satisfy all of the conditions of the Region of Waterloo listed under the heading “Regional Conditions of Draft Approval” contained in their letter dated February 5, 2026 and included as Attachment “D” to Township report DS 2026-13. The conditions of the Region of Waterloo are deemed to be modified to exclude Condition 2, to be “to the satisfaction of the Region of Waterloo and/or

the Township of Wilmot” and that any development agreement referenced in the conditions, if deemed appropriate by the Township of Wilmot and Region of Waterloo, may be with the Township of Wilmot.

54. That prior to release of the plan for registration, the Subdivider will provide the Township of Wilmot with a detailed description of how each condition of draft approval has been satisfied.
55. Draft approval by the Township of Wilmot shall lapse five years from the date of draft approval subject to the provisions of Section 51(32) to 51(33.3) of the Planning Act, R.S.O. 1990, c. P.13, as amended.



PLANNING, DEVELOPMENT
AND LEGISLATIVE SERVICES

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

Andrew Martin

(sent via email)

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

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

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

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

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

Document Number: 4385619

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

REGIONAL COMMENTS

Zoning By-Law Amendment:

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

Draft Plan:

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

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

Housing Comments:

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

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

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

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

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

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

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

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

Affordability

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

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

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

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

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

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

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

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

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

Functional Servicing Report

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

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

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

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

Hydrogeology and Source Water Protection

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

Salt Management Plan:

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

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

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

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

Transit Planning

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

Transportation Impact Study:

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

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

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

Waste Management

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

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

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

Regional Conditions of Draft Approval:

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

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

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

Notes

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

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

Summary

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

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

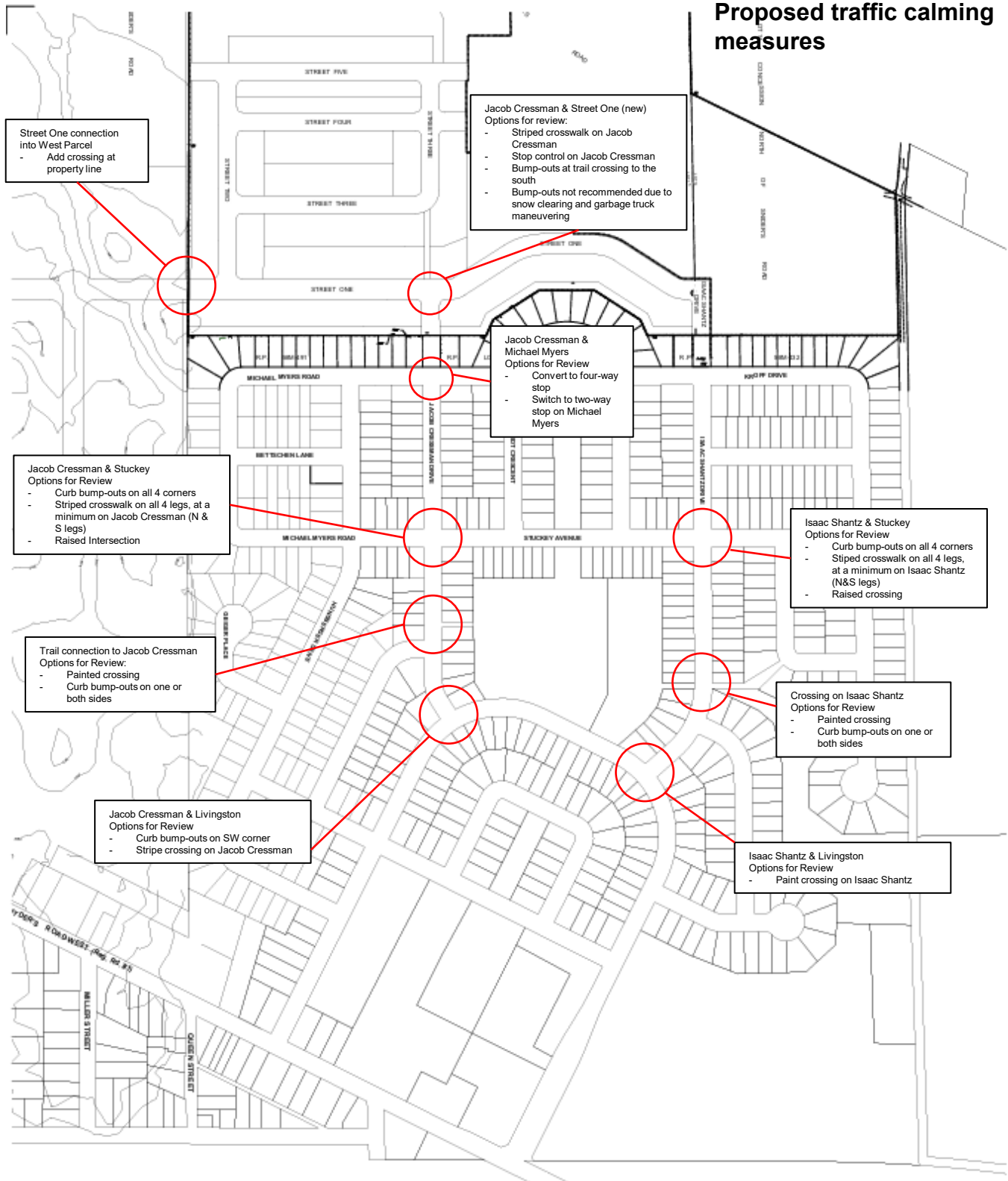
Yours truly,

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

Matthew Colley, MCIP, RPP
Senior Planner

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

Report DS-2026-13
Attachment E:
Proposed traffic calming measures





Report DS 2026-13
Attachment F:
Trails, Parks and Other Land Uses

-  Trail connections
-  Singles
-  Townhouses and other multiples
-  Commercial
-  Parks and trails
-  SWM facilities
-  Proposed Subdivision lands



Report DS 2026-13

Attachment G: Public Comments

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

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

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

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

>

> Hello,

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

>

> Which areas will be high density on the plan.

>

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

>

> Thank you, Keith

From: Grant Mattis

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

To: Clerks <clerks@wilmot.ca>

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

Hello Wilmot Clerks,

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

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

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

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

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

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

Thank you for your kind consideration.

Grant Mattis



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

Hello again Andrew,

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

Key Points of Contention:

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

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

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

Rory

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

Thanks for your reply Andrew.

Enjoy your weekend!

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

Hi Rory,

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

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

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

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

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

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

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

From: Rory Campbell

Sent: Friday, July 21, 2023 11:27 PM

To: Clerks <clerks@wilmot.ca>; Planning <Planning@Wilmot.ca>

Subject: Written Delegation Submission for 30T-22602

Please redirect if there is a better form.

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

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

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

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

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

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

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

Thank you for your consideration,

Rory Campbell

 Michael Myers Road

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

Activa Baden North - Public Comment Form Submission

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

First Name

Deborah

Last Name

Baker

Address

██████ Kropf Dr, Baden, On, N3A4S4

Comments

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

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

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

Activa Baden North - Public Comment

Form Submission

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

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

Comments

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Mike Sooley

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your time and consideration.

Sincerely,

Alex Sooley

■ Kropf Drive, Baden, ON.

From: [Kevin Cross](#)
To: [WilmotOP](#)
Subject: Proposed development
Date: April 29, 2026 6:06:17 PM

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

Hello,

I just wanted to voice my displeasure with the proposed development behind my house. The lack of alternative road access combined with the density of the development will ruin the quiet community feel of Baden. Residents of Wilmot live here to avoid the suburban jungle that this proposal would transform Baden into.

The 'traffic calming' measures proposed will do nothing to limit the huge increase in volume of vehicles that will now have to enter an exit via Jacob Cressman Dr not to mention the congestion at the intersection of Snyder's and Foundry.

Having the highest density of the population commuting the furthest from the access point to the community makes absolutely no sense. I hope the Township revises this development to match the community that exists today.

Best regards,
Kevin Cross
 Michael Myers Rd

From: [EngageWR](#)
To: [Planning](#)
Subject: Activa Baden North - Public Comment Form Submission
Date: May 5, 2026 1:39:35 PM

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Activa Baden North - Public Comment Form Submission

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

First Name

Scott

Last Name

Dawson

Address

■ Livingston Blvd

Email address

■

Comments

I am writing to express my concern regarding the proposed Application, particularly the increase in allowable population density. These changes would permit the construction of six-story buildings, back-to-back homes with no yard space, and the addition of approximately 421 new residential units in an already congested area.

I feel that the traffic calming measures outlined in your 2026-03-11 document are

woefully inadequate. Living on Livingston Blvd is already challenging. On weekday afternoons, simply pulling into or backing out of a driveway can be difficult and, at times, unsafe. Vehicles frequently exceed the posted 40 km/h speed limit and rarely yield to residents. The current conditions already present a safety concern, and it seems only a matter of time before a serious accident occurs. Increasing density without addressing these issues will only worsen the situation.

While I understand that higher density development can benefit developers, I am concerned that there are no corresponding plans to expand local infrastructure or services to support this growth. There appears to be no clear strategy to improve road capacity, traffic management, schools, healthcare access, or emergency services in Baden.

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to EngageWR.

From: [Scott Dawson](#)
To: [WilmotOP](#)
Cc: [Kris Wilkinson](#); [Carol Dawson](#)
Subject: Wilmot Operating Plan Proposed Revision
Date: May 21, 2026 4:04:00 PM

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

My name is Scott Dawson, and I have lived in Baden on Livingston Blvd since 2018.

I am writing to express my concern regarding the proposed changes to the Wilmot Township Official Plan, particularly the increase in allowable population density. These changes would permit the construction of six-story buildings, back-to-back homes with no yard space, and the addition of approximately 421 new residential units in an already congested area.

Living on Livingston Blvd is already challenging. On weekday afternoons, simply pulling into or backing out of a driveway can be difficult and, at times, unsafe. Vehicles frequently exceed the posted 40 km/h speed limit and rarely yield to residents. The current conditions already present a safety concern, and it seems only a matter of time before a serious accident occurs. Increasing density without addressing these issues will only worsen the situation.

While I understand that higher density development can benefit developers, I am concerned that there are no corresponding plans to expand local infrastructure or services to support this growth. There appears to be no clear strategy to improve road capacity, traffic management, schools, healthcare access, or emergency services in Baden.

In addition, increased population density may negatively impact the quality of life for existing residents. This includes increased traffic congestion, parking shortages, and strain on infrastructure such as water, sewage, and power systems. There is also the potential loss of green space, increased pollution, and the urban heat island effect caused by intensified development.

Higher-density housing can also reduce privacy, limit natural light, and contribute to increased noise and stress levels. Rapid development may alter the character of the community and weaken the sense of neighborhood cohesion that currently exists in Baden.

From an economic and social perspective, there are concerns about housing affordability, potential impacts on property values, and the possibility of increased crime associated with overcrowding.

In summary, I urge the Township to carefully consider the broader impacts of these proposed changes. Growth should be balanced with appropriate investments in

infrastructure, safety measures, and community services to ensure that Baden remains a safe, livable, and sustainable place for current and future residents. Thank you for your time and consideration.

Sincerely,
Scott Dawson



From: [Dwayne Pretty](#)
To: [WilmotOP](#)
Cc: [Amanda Walter](#)
Subject: Subdivision 30T-22602
Date: May 9, 2026 9:07:55 PM

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

Good day,

I am writing in strong opposition to Subdivision 30T-22602 and Activa's proposed plans for excessive building heights and density within this development.

The scale and density being proposed are inappropriate for the surrounding area and will have significant negative impacts on traffic, infrastructure, congestion, neighbourhood character, and overall quality of life for existing residents.

This proposal should be rigorously opposed and should not be permitted to proceed in its current form.

Thank you,

Dwayne Pretty

■ Ditner Ave, Baden

From: [Amanda Walter](#)
To: [WilmotOP](#)
Subject: Subdivision 30T 22602
Date: May 9, 2026 9:24:41 PM

CAUTION: This email originated from outside of the organization. Do not click links or open any attachments unless you recognize the sender and know the content is safe.

Hi,

I am writing in strong opposition to Subdivision 30T-22602 and Activa's proposed plans for excessive building heights and density within this development.

The scale and density being proposed are inappropriate for the surrounding area and will have significant negative impacts on traffic and congestion, infrastructure, and has complete disregard for small town living and neighbourhood character. This will change the quality of life for existing residents. Anyone who has chosen to live in a small town has done so to get away from this type of housing and population density/chaos.

This proposal should be rigorously opposed and should not be permitted to proceed in its current form.

Thank you,

Amanda Walter



Ditner Ave, Baden