



NEW OFFICIAL PLAN Housing Needs Background Report

November 2025



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1.0 Introduction and Purpose of the Discussion Paper

This section provides an overview of what an Official Plan is and how it is operationalized. It introduces the Township's new Official Plan process, the discussion papers, and the purpose of this discussion paper.

1.1 What is an Official Plan?

An Official Plan is a comprehensive document, intended for long-term use, that shapes the future of a municipality by establishing how land in the community will be used. It outlines the goals, objectives, and policies for sustainable, efficient, growth within Wilmot Township. All development and public works in the township must conform to the Official Plan.

The legislative ability for municipalities to enact an Official Plan arises from the Provincial *Planning Act*. All policies in the Official Plan must conform to this higher-order Provincial legislation. The Township of Wilmot is in the process of crafting a new Official Plan which will guide growth and development within Wilmot to the year 2051. For the past two decades, growth in Wilmot has been shaped by both the Region of Waterloo's Official Plan and the Wilmot Official Plan. With recent provincial legislation that removed planning authority from the Region of Waterloo, Wilmot has the opportunity to create a made for Wilmot Official Plan. This will incorporate the best of our past and present Official Plan policies, while charting out the future of Wilmot to the year 2051. A new Official Plan is being created to replace the existing Township and Regional Official Plans and align with the 2024 Provincial Planning Statement.

The new Official Plan will build on the Township's long-term vision for growth with a renewed focus on complete communities. This will include a range and mix of housing, employment opportunities, schools, recreational amenities, options for servicing, roads and active transportation while protecting natural heritage features and farmland.

1.2 Township of Wilmot New Official Plan Process

The creation of Wilmot's New Official Plan will occur over a year-long period with several touchpoints for community consultation.



Figure 1: Graphic showing the Wilmot New Official Plan Process

Phase 1 of the project included drafting the Consultation Strategy and early conversations the project team held with Wilmot residents to inform the process. A series of one-on-one conversations were had between residents and interested members of the public to lay the foundation for the project. Notice of the project initiation was provided to agencies and Indigenous communities. The Township of Wilmot project team hosted a booth at the 2025 New Hamburg Fall Fair, where we began to shape a vision for what Wilmot's new Official Plan could look like. Following those initial early touchpoints with the community, a formal Public Workshop was held on September 23, 2025, to gather thoughts from the public on the vision and fundamental principles that form the foundation of the new Official Plan.

Phase 2 of the Official Plan involves conducting Background Research and Study Preparation, which includes the release of seven draft discussion papers for public and stakeholder review and comment. At this time, a Special Meeting of Council will be held to formally introduce the project to the community and offer tangible research that will help focus community conversations in on the themes of housing, commercial needs, employment, transportation, water and wastewater, stormwater management, and

urban design. Based on public feedback, the draft discussion papers will be reviewed and finalized. What we've heard will inform a series of policy directions which will inform Phase 3 of the project.

Phase 3 of Wilmot's new Official Plan is the drafting of policies and land use maps. These draft policies and maps will be published as draft and shared with Wilmot residents, stakeholders, and Indigenous communities for any further suggestions and input. A copy of the draft Official Plan will be forwarded to the Ministry of Municipal Affairs and Housing for their review as part of Phase 3 of the project.

Phase 4 of the project involves the formal adoption of Wilmot's new Official Plan by the Township of Wilmot's Council. Once Council adopts Wilmot's new Official Plan, the Official Plan will be forwarded to the Ministry of Municipal Affairs and Housing for the Minister's review and approval. After ministerial approval, the Township's new Official Plan will be in effect and replace both existing Township and Regional Official Plans.

1.3 What are the Discussion Papers?

A series of seven background supporting studies have been developed to support the creation of Wilmot's New Official Plan. Each of the discussion papers covers a key theme for the project including:

- Housing Needs Study
- Commercial Needs Analysis
- Employment Projections and Employment Land Needs Analysis
- Transportation
- Water, Wastewater Servicing Strategy
- Stormwater Servicing Strategy
- Urban Design

The discussion papers will form the basis of the first phase of consultation for the project and assist Wilmot Township in developing the preliminary policy directions for the New Official Plan.

1.4 Purpose of this Discussion Paper

This Discussion Paper provides strategic recommendations as to how the future population in the Township can be housed, based on an examination of the current housing supply, current trends in residential development, and the anticipated needs and desires of future residents. The goal is to provide policy direction in terms of the amount and types of housing required, including how best to address housing affordability and accessibility.

2.0 Legislative Overview

This section provides an overview of the provincial legislative context which informs the basis of creating Wilmot's New Official Plan.

2.1 Planning Act

The *Planning Act* is the overarching Provincial legislation which governs land use planning in Ontario. It establishes the respective roles of the Province and municipalities regarding land use planning and provides the basis for municipalities to create and use various planning tools, such as Official Plans and Zoning By-laws. The Act also sets out regulations for how planning processes are to be carried out, including mandatory dates for the completion of tasks, such as deciding on a planning application and setting the date for a public meeting. Notably, in Section 2, the Act establishes “matters of provincial interest,” which municipalities must have regard to when carrying out land use planning. These matters include (but are not limited to) protection of ecological systems, protection of agricultural and natural resources, conservation of cultural history, provision of a full range of housing, the accessibility for persons with disabilities, and the orderly development of safe and healthy communities. It is important to note that all planning decisions and policies made by a municipality (or other planning authority) must conform to the *Planning Act*, as well as provincial plans, as outlined in Section 2.1 of the Act. Further, Section 3 of the Act requires that all planning decisions shall be consistent with the Provincial Planning Statement.

The *Planning Act*, Part III – Official Plans sets out how Official Plans shall be created by a municipality, with respect to content and process.

16 (1) An official plan shall contain,

- (a) goals, objectives and policies established primarily to manage and direct physical change and the effects on the social, economic, built and natural*



environment of the municipality or part of it, or an area that is without municipal organization;

(a.1) such policies and measures as are practicable to ensure the adequate provision of affordable housing;

(b) a description of the measures and procedures for informing and obtaining the views of the public in respect of,

(i) proposed amendments to the official plan or proposed revisions of the plan,

(ii) proposed zoning by-laws,

(iii) proposed plans of subdivision, and

(iv) proposed consents under section 53; and

(c) such other matters as may be prescribed.

Section 17 of the *Planning Act* sets out that “the Minister is the approval authority in respect of the approval of a plan as an official plan” and sets out a prescribed process the Township of Wilmot must follow in the preparation of a new Official Plan.

Specifically, the Township must provide for consultation and a public meeting, an open house, and adequate notice provided for each.

(15) In the course of the preparation of a plan, the council shall ensure that,

(a) the appropriate approval authority is consulted on the preparation of the plan and given an opportunity to review all supporting information and material and any other prescribed information and material, even if the plan is exempt from approval;



- (b) *the prescribed public bodies are consulted on the preparation of the plan and given an opportunity to review all supporting information and material and any other prescribed information and material;*
 - (c) *adequate information and material, including a copy of the current proposed plan, is made available to the public, in the prescribed manner, if any; and*
 - (d) *at least one public meeting is held for the purpose of giving the public an opportunity to make representations in respect of the current proposed plan.*
- 2006, c. 23, s. 9 (2).*
- (16) *If the plan is being revised under section 26 or amended in relation to a development permit system, the council shall ensure that at least one open house is held for the purpose of giving the public an opportunity to review and ask questions about the information and material made available under clause (15) (c).*

The creation of Wilmot's new Official Plan must be done in conformity with the *Planning Act* and the legislated process outlined above.

2.2 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024 ("PPS") is a guiding policy document that provides direction on a variety of planning and land use matters in the province. The legal basis for conformity to the PPS is rooted in Section 3 of the *Planning Act*, which requires that all planning decisions be consistent with the minimum standards set out in the PPS. The Provincial Planning Statement outlines that "Official plans are the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning."

The PPS puts forward policy regarding housing, infrastructure, resource management, and public health. Pertinent policies for the new Wilmot Official Plan include adjustments to municipal planning boundaries, regulations regarding employment



areas, agricultural protection, and population growth targets. Specific policy guidance is provided by the PPS as it relates to planning for people and homes.

2.1.3 At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

Furthermore, the PPS provides general policies for implementation and interpretation as it relates to the creation of Wilmot's new Official Plan.

6.1.5 Official plans shall identify provincial interests and set out appropriate land use designations and policies. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas.

In order to protect provincial interests, planning authorities shall keep their official plans up-to date with the Provincial Planning Statement. The policies of the Provincial Planning Statement continue to apply after adoption and approval of an official plan.

The PPS also provides guidance specific to planning for Housing and housing need. Section 2.1, Planning for People and Homes, provides Provincial guidance on specific policies for planning for growth and supply needs.

2.1.1 As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.



2.1.2 Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.

2.1.4 To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- (a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
- (b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

Section 2.2, Housing, provides Provincial guidance on specific policies for planning for housing options, mix, and densities.

2.2.1 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- (a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*
- (b) permitting and facilitating:*



1. *all housing options required to meet the social, health, economic and well being requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
 2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- (c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- (d) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

Finally, once Wilmot's new Official Plan has been approved by the minister, the PPS sets out a requirement for ongoing monitoring of the Official Plan's implementation.



3.0 Local Housing Policy Context

This section provides an overview of existing growth management and housing documents at the Regional and local level, to understand the policy context that the New Wilmot Official Plan will be expanding on. It will include a review of the following policies:

3.1 Region of Waterloo Official Plan, 2025

The Waterloo Regional Official Plan, 2025 (“ROP”) was the Official Plan of the Region of Waterloo, which is an upper-tier municipality that encompasses a federation of lower-tier municipalities, including the Township of Wilmot. Historically, the Region of Waterloo was the approval authority for the Township of Wilmot’s Official Plan, and Wilmot was required to conform to that plan.

As of January 1, 2025, the Waterloo Regional Official Plan became a Local Plan of the Township of Wilmot. A new Official Plan is being created to replace the existing Township and Regional Official Plans and align with the 2024 Provincial Planning Statement. Wilmot’s new Official Plan will incorporate the best of the Region of Waterloo’s Official Plan policies, while charting out the future of Wilmot Township’s growth to the year 2051.

The Region of Waterloo’s Official Plan contained high-level policies which promoted a range and mix of housing that guided housing policy implementation at the local Township level. These policies spoke briefly to:

- A focus on supporting a diverse range and mix of housing options and densities, including additional residential units, affordable, and missing middle housing, to serve all sizes, incomes, and ages of households.
- Achieving net-zero operational carbon performance for all newly built housing, including affordable housing, and implementing measures to minimize embodied



carbon and building energy needs, supporting the energy transition off fossil fuels, and increasing the overall energy resiliency in the community.

More specific housing policies took direction from the Region's Official Plan and are implemented through the Township of Wilmot's Official Plan.

3.2 Region of Waterloo Land Needs Assessment, 2022

In 2022, Dillon Consulting Limited and Watson & Associates Economists Ltd. conducted a Land Needs Assessment (LNA) for the Region of Waterloo. The LNA notes that, as per the 2019 Growth Plan, the Region must plan for a “minimum [total] population of 923,000 and 470,000 jobs by 2051” (p.i.). It projected significant housing need over the planning period, as the Region is forecast to grow faster than the Province as a whole. It also noted that average housing prices grew between 11.8% and 16.2% from 2014 to 2022 (p.iv.-v.). To address the need, the LNA presented three options, with density targets ranging from 50 to 66 people and jobs per hectare in designated greenfield areas, and 50% to 60% minimum intensification targets.

Overall, the LNA allocated limited population and housing growth to the Township of Wilmot. The options allocated populations ranging from 8,800 to 16,400 people and jobs to 2051. This corresponded with an average of 80 to 175 new homes per year (p.xiv).

3.3 Township of Wilmot Development Charges Background Study, 2021

The Development Charges Background Study provided a growth forecast up to 2031. The Study forecast a population of 27,067 for this timeframe, which represented an increase of 6,220 people or 30% from 2019 to 2031 (approximately 518 persons per year).

Notably, population growth in Wilmot has been below that of this forecast. Based on population estimates, Wilmot's population has only grown by 1,028 people from 2019 to 2024 (approximately 205 persons per year). This is likely due to servicing constraints



which have limited the growth in Wilmot over the past 10 years, as Wilmot grew at a faster rate than Waterloo Region in the early 2000s.

3.4 Waterloo Region Economic Development Strategy, 2014

The Waterloo Region Economic Development Strategy included four strategic objectives. The fourth strategic objective is “To be a community of choice for talented people” (p.40). A key pillar of this goal is “To ensure an appropriate mix of housing that reflects the needs and aspirations of current and future residents” (p.41), along with “To create a green, sustainable, efficient region, that anticipates growth” (p.41).

3.5 Township of Wilmot Strategic Action Plan: 2025–2027

The third Goal of the Strategic Plan is Prosperous Businesses & Balanced Growth, which includes “encouraging well-planned growth while preserving our rural heritage and small-town character,” “support local businesses and provide more housing options,” and “protecting our natural environment.” This includes several housing-related action items, including:

- “Complete a secondary plan for Baden and New Hamburg identifying areas where higher density housing is appropriate.”
- “Introduce Community Improvement Plan (CIP) with incentives to revitalize core urban centres and encourage more affordable housing in appropriate locations.”

3.6 Waterloo Rural Investment Readiness Strategy, 2025

Housing costs were identified as a key weakness in the Strengths, Weaknesses, Opportunities, and Challenges exercise (p.109). Housing costs were also identified as a major challenge to economic growth during stakeholder consultations (p.105).

As such, a recommended strategic direction was to improve housing affordability to attract and retain workers, through housing policies and programming (p.159).



4.0 Key Topics for Discussion

The following section provides an overview of the key topics for discussion as they relate to the Housing discussion paper.

4.1 Market Context and Objectives of Housing Policy

This section discusses the objectives of creating policy that facilitates a range of housing options. It will also provide background on the roles of market housing providers, the Region of Waterloo, and Non-Governmental Organization partners when it comes to developing and implementing housing policy.

Context

Municipalities across Ontario and Canada are facing a housing affordability crisis. Housing prices and rental rates have increased dramatically over the past 10 years. The impact of the housing crisis has been felt across households of different income levels, with housing often being unaffordable to households with above-median household incomes.

At the same time, housing has also become more expensive to build. The lingering effects of supply chain disruptions through the Covid-19 pandemic and the recent impacts of tariffs have caused construction costs to increase dramatically over the past five years. In many jurisdictions across Southwestern Ontario, construction costs are high enough that the prices and rents needed to justify higher-density housing construction can be more than what the households can afford.

The context around Wilmot has also changed. Kitchener and Waterloo are approaching full build-out. As their supply of greenfield lands shrinks, people who otherwise would have moved into these cities would likely consider moving to neighbouring communities, including Wilmot. While recent changes in immigration policy may ameliorate growth

pressures in Waterloo Region, it is likely that more housing is needed in the Region to restore housing affordability.

Communities such as Wilmot, which are adjacent to large urban areas and contain large amounts of lands that could support new greenfield development, are well positioned to attract future growth, particularly for families who are seeking alternatives to higher-density housing formats.

Goals

Housing policy can play an important role in allowing the Township of Wilmot to create a high-quality environment for its existing and future residents. Broadly, housing policy should meet the housing needs of the residents of Wilmot, as well as enhance the provision of amenities and the public realm. Below, we discuss some goals that may be considered when developing housing policy. These may be expanded through stakeholder engagement and input from staff.

Meeting Housing Needs and Demands

Housing policy should meet the needs of households across the full-income spectrum within the Township. Different types of housing are needed to meet the needs of households of different income levels, as illustrated by the housing continuum (see **Figure 2** below).

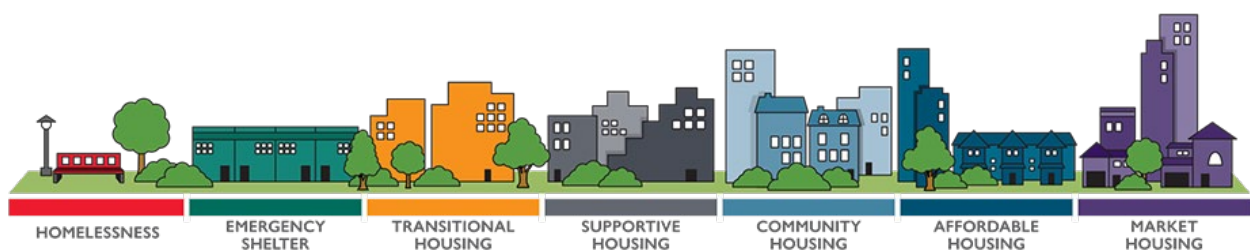


Figure 2: The CMHC Housing Continuum



At the highest end is market-rate ownership housing and market-rate rentals. Below that are housing targeted towards lower-income households. These include affordable ownership and rental housing, social housing, transitional housing, and emergency shelters.

Based on the post-1980s policy environment, market housing is relied on to provide housing for most Canadians. Non-market housing can be challenging to expand as these options generally come at a significant cost, either to municipalities/non-profits or to purchasers and renters of market housing. With the increase in the prices and rents of market housing, more pressure is placed on social housing. Policies which improve the supply and affordability of market housing will conversely reduce the demands on social housing.

In addition to income levels, household types and size play a significant role in determining housing need. Household fertility choice will also influence and be influenced by housing availability and need.

Housing policy should ensure that housing, in multiple types and forms, meet people's needs and desires. If these needs are not met efficiently and effectively, housing prices will rise across the board as more people compete for a limited supply of suitable housing.

Efficient Servicing

Housing policy can also encourage the creation of housing in areas that are more cost-efficient to service. In doing so, the effective (financial and resource) cost of housing can be reduced.

Usually, this means building in areas with existing servicing. Additionally, denser construction can also reduce servicing costs. Both reduce the number of roads and sewers that would be required to service the homes.

This can be especially important for Wilmot, as the Township has experienced severe constraints in servicing in the recent past. Future growth will, therefore, require an efficient and cost-effective servicing strategy.

Public Realm

Housing policy is also an important driver of complete communities and walkable streets, enhanced public realm facilities (such as parks, public squares, wide sidewalks, and bike lanes), and community uses (such as recreation centres, libraries, social services, and places of worship). Neighbourhoods which facilitate high-quality walking and cycling environments rely on higher densities to reduce distances to important community and commercial nodes.

Environmental and Agricultural Impacts

Development in any form, including housing, can conflict with natural heritage lands and agricultural lands. These lands can be extremely important and valuable aspects of Wilmot.

Additionally, development should be handled responsibly to avoid natural hazards, such as floodplains, where possible. Development in these areas can put people in harm's way, as well as potentially increasing the effective costs of these developments (in the form of insurance and/or repair and rebuilding costs).

Housing policy should balance and weigh these concerns against the need for housing and ideally provide solutions that can deliver the housing needed with a low environmental impact. Notably, higher-density development can allow more housing to be provided while also limiting pressure to encroach into natural heritage and agricultural lands and/or areas at higher risk of natural hazards.

Current and Future Residents

One challenge of housing and land use policy is the need to balance the concerns of both current and future residents. Residents have chosen to live in Wilmot Township because of its current amenities and lifestyle. Changes to the built environment and population growth represent changes that may impact their perception of their quality of life.

However, future residents also need consideration, especially since they often cannot advocate for themselves. The failure to consider them would not only mean policies would fail to protect these future residents, but also likely means that Wilmot would not be properly adapting to changing circumstances. The impacts of this failure could result in inappropriate built forms and land uses, rising housing prices, excessive or insufficient retail space, and/or economic stagnation.

4.2 Wilmot's Context for Housing Policy

Homes in Wilmot today are mostly single-detached dwellings, with 79% of homes being single-detached (as per the 2021 Census). Ground-related homes make up almost all homes in Wilmot, although there is a small number of apartments, representing approximately 9% of homes.

As the supply of residential development land elsewhere in the Region becomes scarcer, housing costs begin to play a greater role in terms of a family's housing choice. While the abundance of greenfield land in Wilmot represents a significant strategic advantage, housing pressures will likely mean that neighbourhoods will be built at higher densities in the past. In the context of Wilmot, this may mean more townhomes, semi-detached, low/mid-rise apartments, and small lot singles than in the past.



4.3 Methodology for Housing Supply, Demand, and Needs Analysis

This section provides the methodology for housing supply, demand, and needs analysis, which will include an overview of the data examined, as well as assumed theories for interpreting the data found.

In the following sections, we consider the future housing needs for Wilmot to inform and determine planning policy. In this section, we discuss important theoretical considerations behind this process.

Provincial Planning Policy, including the recently released draft projection methodology, requires that housing forecasts start with a population projection. From this, housing need is determined by making assumptions with regards to the type of units, locations, and densities that should be developed to accommodate the future population.

Residential land needs can be calculated based on those housing needs.

The benefit of this approach is that it provides a measurable population target to plan towards, but there are some severe problems with this methodology. The first is that population growth and housing growth are inextricably linked. The type, amount, and location of new housing will directly influence the population growth that can be attracted to a community. In many cases, it is necessary to understand the local housing market, including development constraints, before a reasonable population projection can be made. Forecasting future population and housing needs requires an understanding of many factors, including local economic conditions (e.g., the entry or exit of major employers), national immigration policies, land supply in the local market, and planning and housing policies of neighbouring municipalities, among others.

Second, the current population, historical population growth, and future population are all reliant on housing policy. For example, a municipality with restrictive housing policies would likely have low historical population growth, and projections based on those historical growth rates could underestimate the true future housing demand.

Thirdly, often the amount of housing a community is expected to accommodate is dictated by capacity constraints rather than demand. These may include: the availability of water; constraints imposed by land use policies, or geographic constraints, such as environmental lands. To some extent, this is true with respect to Wilmot, which is well positioned to accommodate the “overflow” housing demand from Kitchener and Waterloo which have a very limited supply of greenfield land but must contend with servicing constraints.

As such, while we provide population and housing needs projections, we advise that these should be considered as illustrative scenarios or minimums (as policy being too constraining usually has more negative impacts than policy being too flexible). A flexible approach to land use planning, and particularly density, could be used to ensure that the market can better respond to future demand.

Additionally, where possible, data on prices and quantities should be considered jointly to determine whether the supply of housing is sufficiently flexible to meet changing demand. Looking at quantities (e.g., population, housing stock) alone is not enough to distinguish between an increase in population that the housing market is straining to support, compared to an increase in population because homes are easier and cheaper to build. Data on prices is usually a more reliable indicator of whether housing policy is too restrictive (as an example, central banks set monetary policy based on the inflation rate, which is a price statistic).

4.4 Housing Supply and Demand: Municipal and Regional Analysis

This section uses the information discussed in sub-sections 4.1 through 4.3 to provide an analysis that examines the relationship between the number of available housing units and typologies (supply) and the existing population (demand) to determine future trends, including housing prices and rents.

Population Trends and Projections

Figure 3 below shows the population trends for Wilmot from 2001 to 2024 based on the Statistics Canada Population Estimates, along with population projections based on the Ministry of Finance projections for Waterloo Region. We used three different methods to impute population projections for Wilmot. The “Population Share” method assumes Wilmot’s population will remain a constant fraction of Waterloo Region’s total population. The “Growth Share Low” method assumes Wilmot’s growth is a constant fraction of Waterloo Region’s growth based on recent growth rates, which are relatively low. Finally, the “Growth Share High” method assumes Wilmot’s growth is a constant fraction of Waterloo Region’s growth based on Wilmot’s highest growth rates since 2001.

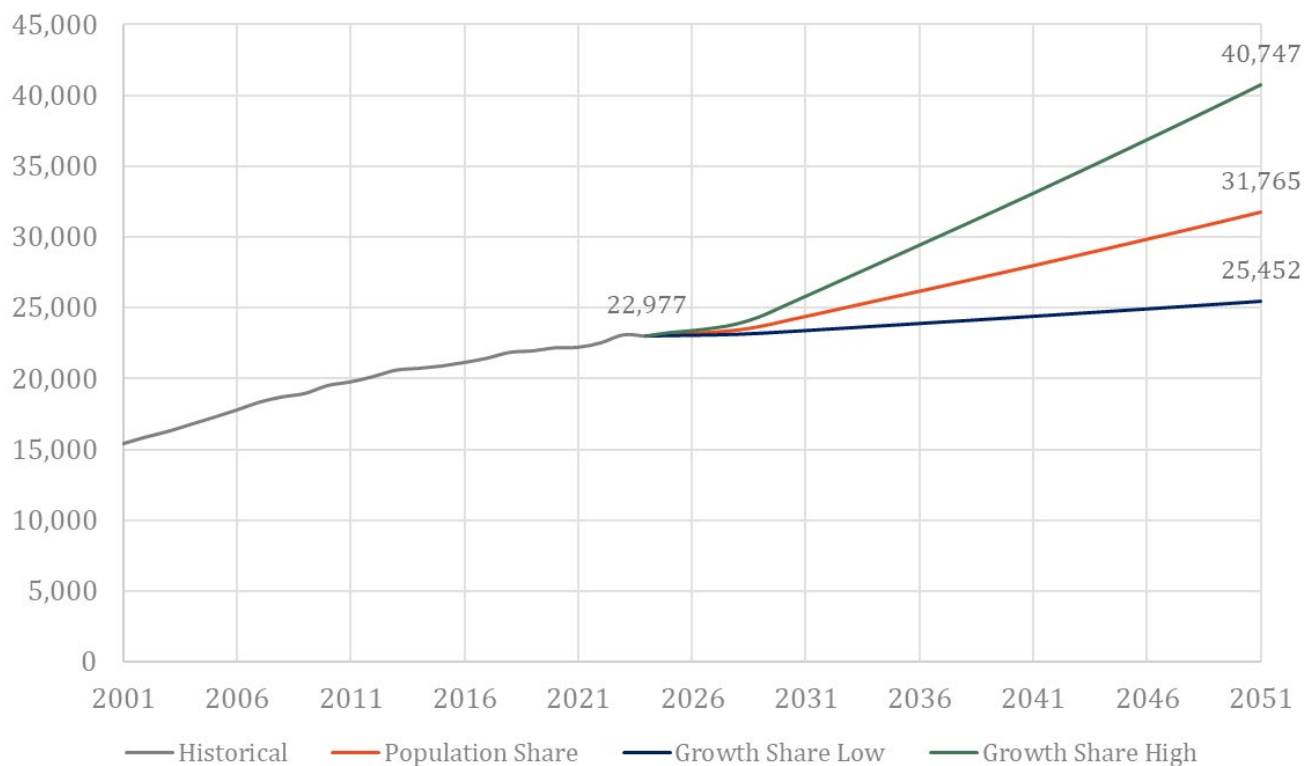


Figure 3: Wilmot Population Trend and Projections

Wilmot’s population growth was relatively high at the start of the century but has since tapered off as servicing constraints have limited new growth. From 2002 to 2007,



Wilmot's population grew just under 3% per year, almost double the rate of Waterloo Region during that time. This slowed to about 2% per year from 2008 to 2013 and 1% per year from 2014 to 2024.

Assumptions about Wilmot's future growth rates will have a significant impact on its projected future population. The highly conservative assumption that Wilmot's growth will remain low would result in a projected 2051 population of 25,452, just 11% higher than the 2024 population. The assumption that Wilmot's population will remain a constant fraction of Waterloo Region's population would see Wilmot's population grow by 38% to 2051, to 31,765 people.

The fact that Wilmot's growth was artificially constrained by servicing capacity would impact both projections. If these capacity constraints were resolved, it's likely that Wilmot could grow much faster. If we assume that Wilmot's growth rate could match its high levels in the early 2000s, then Wilmot would be projected to grow by 77% to a population of 40,747 by 2051—when there was increased servicing capacity available. Meeting that rate of growth today would require a considerable rethink of how water and wastewater services are provided in Wilmot.

While these projections can illustrate some possible paths which Wilmot may experience, they do not capture the full range of possibilities that could happen. Wilmot's future growth will be affected by unpredictable factors such as the success of local and regional employers, broader macroeconomic conditions, immigration policy, and conditions for housing construction. High growth rates would further require that servicing capacity be expanded, and constraints in servicing capacity would limit growth as it has in the past. Additionally, Kitchener and Waterloo are approaching full build-out and their supply of greenfield lands is dwindling, so their share of Waterloo Region's growth would likely decline over time. These factors are not necessarily captured in any of these projections.

Housing Composition and Trends

Figure 4 below compares the housing composition and tenure of Wilmot to those of Waterloo Region based on the 2021 Census Profile. While ground-related homes, including single- and semi-detached houses, row houses, and apartments or flats in a duplex, make up most of the homes in both Wilmot (92.7%) and Waterloo Region (73.8%), Waterloo Region (26.0%) has a much higher proportion of apartments than Wilmot (7.1%). In addition, much of the apartment stock in Wilmot is comprised of units within other structures, such as units on top of commercial businesses or accessory apartments, as opposed to purpose-built rental buildings.

	Wilmot	Waterloo Region
Housing Composition		
Single-Detached House	79.2%	53.5%
Semi-Detached House	8.6%	6.0%
Row House	3.3%	11.5%
Apartment or flat in a duplex	1.6%	2.8%
Apartment under 5 storeys	7.0%	13.1%
Apartment 5+ storeys	0.1%*	12.9%
Tenure		
Owner	85.5%	65.0%
Renter	14.6%	35.0%



*Figure 4: Wilmot and Waterloo Region Housing Composition and Tenure
(*While the Census profile data shows a small number there are currently buildings over 5 storeys in height in Wilmot)*

Compared to Waterloo Region, Wilmot has a higher proportion of owners and a lower proportion of renters. The proportion of renters has increased from 2016 to 2021 for both, but the increase was larger for Waterloo Region (3.2%) than Wilmot (1.2%).

	Single	Semi-Detached	Row	Apartment	All
2017	107	2	4	0	113
2018	81	4	0	0	85
2019	49	2	4	4	59
2020	25	12	4	1	42
2021	21	6	0	0	27
2022	13	2	4	16	35
2023	16	10	4	32	62
2024	10	0	0	4	14

Figure 4: Wilmot Housing Starts by Dwelling Type

It is possible that the housing composition in Wilmot may change in the future. **Figure 5** shows the housing starts in Wilmot from 2017 to 2024. Not many homes have started in Wilmot over this period, especially after 2020. Notably, in 2022 and 2023, about half of the homes started were apartments. This includes a new 32-unit rental project on Snyders Road East in Baden.

Housing Prices and Rents

As with other municipalities across Ontario and Canada, Waterloo Region has seen housing prices increase at dramatic rates in the recent past. To consider how housing prices have changed in Waterloo Region, we considered the MLS Housing Price Index (HPI), using the one-storey single-family price benchmark for the Kitchener-Waterloo market (see **Figure 6**).

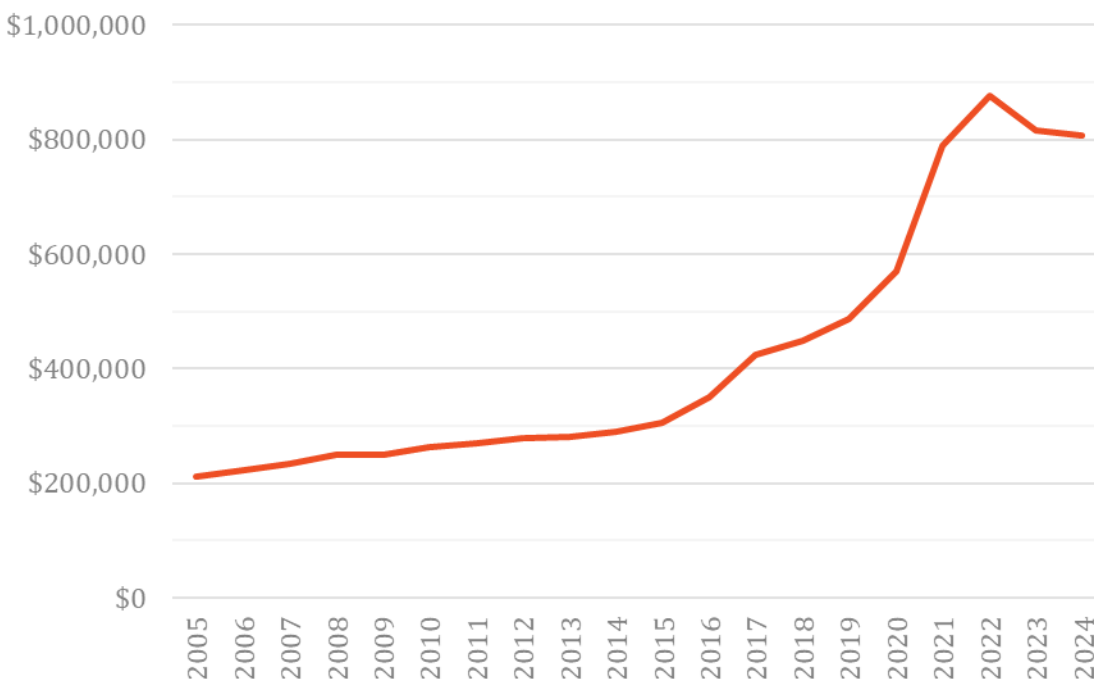


Figure 5: Kitchener-Waterloo Benchmark House Price, One-Storey Single-Family

Housing prices in Waterloo Region rose slowly but still faster than inflation from 2005 to 2015, with an average growth rate of 3.8%. Benchmark prices for a one-storey single-family home rose from \$223,300 to \$305,500 over this time. However, from 2016 to 2022, house prices experienced an average annual growth rate of 16.7% (much higher than inflation), with the benchmark price peaking at \$876,400. Prices fell slightly from 2023-2024 to \$806,800, but they remain much higher than past levels.

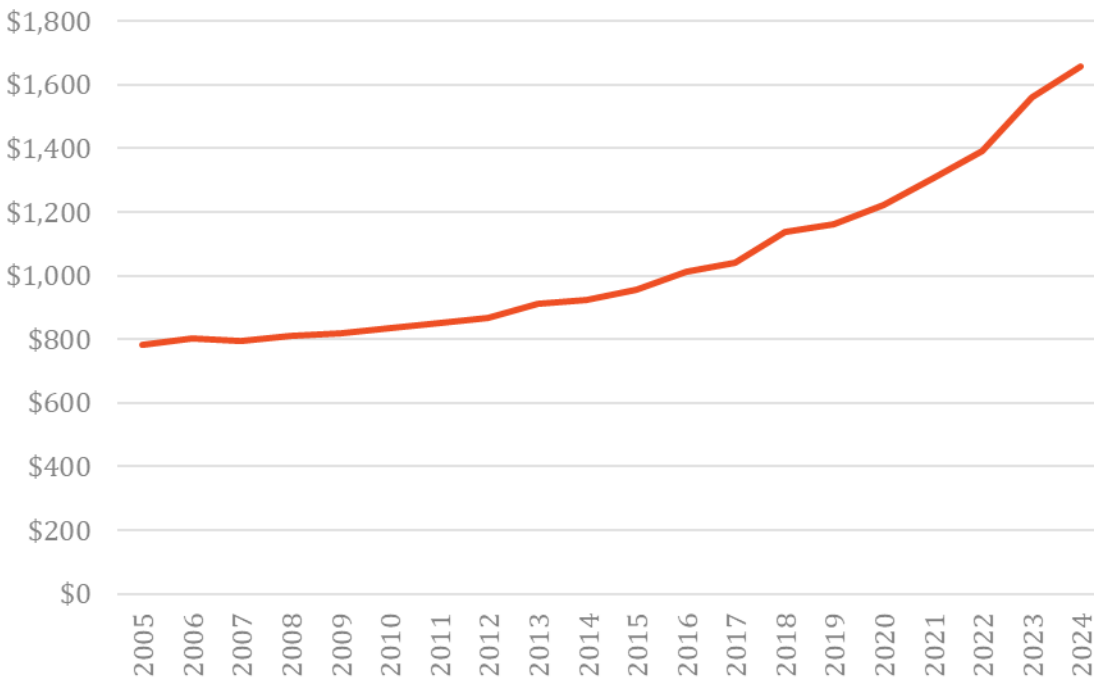


Figure 6: Kitchener-Cambridge-Waterloo Average Rents

Average monthly rents in the primary rental market in the Kitchener-Cambridge-Waterloo CMA also increased dramatically over this timeframe, although not as much as housing prices had (see **Figure 7**). Average rents rose from \$782 in 2005 to \$1,658 in 2024. Rents increased by a relatively moderate average annual rate of 2.3% from 2005 to 2015. From 2016 to 2024, rents increased by an average annual rate of 6.4%, much higher than inflation. Notably, the average rent data from CMHC includes rent-controlled units, whose rents increase slower than those of non-rent-controlled units in hot markets. Rents for new or vacant units, which are not subject to rent control, would likely have increased even faster over this time.

4.5 Housing Needs

Supply-and-Demand Framework

The use of a supply-and-demand framework allows the interpretation of the data to consider what is driving the changes seen in the housing market. The joint



consideration of price and population trends allows for a more reliable diagnosis for what is happening in the housing market and whether housing demand and needs are being met.

The data examined in the previous sections show that across Waterloo Region, housing supply has not kept up with demand. Prices and rents have increased much faster than inflation. This came at a time when Waterloo Region grew significantly as well. These data patterns strongly suggest that the demand for housing has increased greatly, while the supply of housing has not been flexible enough to keep up.

Affordability

Housing is often defined as being affordable for a household if housing costs are less than 30% of household income. The Census provides estimates for the number of households in core housing need, which is defined as living in housing which is unaffordable for them, which has too few bedrooms given the household size, and/or which is in need of repair. As housing prices and rents increase, more households would be in core housing need, either directly or as they live in unsuitable housing or housing in poor repair to reduce their shelter costs.

As of 2021, Waterloo Region had 30% of its households in core housing need. Only 16% of households in Wilmot were in core housing need. Spending 30% or more of income on shelter costs accounted for roughly two-thirds of the households in core housing need. While Wilmot had fewer households in core housing need, there are still many households struggling with housing affordability. Additionally, this statistic may not represent the experience of households who may wish to move to Wilmot, and the number of households in core housing need will change over time if Wilmot becomes a more desirable place to live.

To consider housing affordability in Wilmot more generally, we considered the monthly affordable shelter costs for households across income categories. The University of



British Columbia provides Housing Assessment Resource Tools (HART) which can calculate the monthly affordable shelter costs for different income categories defined based on the area median household income.

Income Category	Annual HH Income	Monthly Affordable Shelter Cost	% of Total HHs
Area Median Household Income			
	\$136,600	\$3,415	
Very Low Income (20% or less of AMHI)	<= \$27,320	<= \$683	2.23%
Low Income (21% to 50% of AMHI)	\$27,320 - \$68,300	\$683 - \$1,708	15.61%
Moderate Income (51% to 80% of AMHI)	\$68,300 - \$109,280	\$1,708 - \$2,732	19.28%
Median Income (81% to 120% of AMHI)	\$109,280 - \$163,920	\$2,732 - \$4,098	25.25%
High Income (121% and more of AMHI)	>= \$163,920	>= \$4,098	37.64%

*Figure 7: Wilmot Income Categories and Affordable Shelter Costs
Source: UBC Housing Assessment Resource Tools, adjusted to 2025 dollars.*

Figure 8 above shows the monthly affordable shelter costs for each income category for Wilmot. Because Wilmot has relatively high household incomes (for comparison, median household income in Waterloo Region is around \$111,437), housing can potentially be affordable for most households.

To consider whether benchmark house prices would be affordable, we used a mortgage calculator to convert sale prices into a monthly mortgage payment. We assumed a 20% down payment, a 30-year amortization period, and an interest rate of 4.24% (based on Ratehub estimates).

The benchmark one-storey single-family home in Waterloo Region, priced at \$806,800, would require monthly payments of \$3,157. This would be affordable to households making at least 92% of the area median household income (over half of households).

The benchmark townhouse, priced at \$612,900, would be require monthly payments of \$2,399. This would be affordable to households making at least 70% of the area median household income. Still, over 18% of households in Wilmot would not be able to afford this.

While this analysis shows that housing may be affordable to most households in Wilmot, it is important to note that types of households that choose to live in Wilmot is impacted by housing prices and rents in Wilmot. These income categories are not necessarily indicative of everyone who may want to live in Wilmot. This is especially true if more growth is directed towards Wilmot as Kitchener and Waterloo approach full build-out, as households in Wilmot currently have higher income than households across Waterloo Region.

It is likely that households with low and very low income may not be able to afford housing without social support, even in loose housing markets. These households may need social or subsidized housing (often provided by the Region of Waterloo or non-profit groups) to meet their housing needs.

Improving Housing Affordability

How housing affordability can be improved has been the topic of intense study in the recent past. Based on careful empirical studies, the balance of the evidence suggests



that increasing the amount of housing built (such as through broad upzoning) improves housing affordability. New homes, even at market rates, can benefit even lower-income households by reducing the prices and rents of older homes, thus reducing displacement.

The evidence also suggests that alternative measures are often not able to improve housing affordability. For example, requiring private developers to sell or rent homes at below-market rates (such as through inclusionary zoning) can potentially provide help fortunate households who receive such a home, but cannot be a broad-based solution to solving the housing crisis. Recent evidence suggests that such policies may also increase housing prices and rents as the costs of the below-market homes must be passed on to those paying market rates. A requirement which is too high can also have a stifling effect on new development, worsening housing affordability across the board. As such, it is likely not helpful to set a Town-wide target for new affordable homes, outside what the Region of Waterloo and non-governmental providers of social housing may be able to achieve.

In the current context, a broader allowance for townhomes and low-rise apartments may be especially helpful. Construction costs have risen significantly over the past five years, and it is now difficult to build high-rise apartments at prices that households can afford. Townhomes and low-rise apartments have lower hard construction costs per square foot. However, these building typologies require more land. Because they tend to have fewer units, they are less able to pay the costs of rezoning land. As such, zoning to allow these building typologies across large land areas may be especially helpful in the current environment.

Projections-Based Housing Needs

While population projections are limited in their accuracy, it can be useful to consider approximately how many homes would be required to support the various population

projections. Here, we use Waterloo Region’s headship rates by age category as forecast in Appendix C of the 2022 Region of Waterloo Land Needs Assessment. We also use the Land Needs Assessment’s forecast for housing growth by structure type (low density, medium density, and high density) and age category for the Region. These projections are provided for two density scenarios. “Option 1” is the Growth Plan minimum density of 50 people and jobs per hectare in designated greenfield areas across Waterloo Region, with a density of 42 people and jobs per hectare for Wilmot. “Option 2” is a more compact development form with 60 people and jobs per hectare in designated greenfield areas across Waterloo Region, with a density of 51 people and jobs per hectare in Wilmot. Notably, the LNA projects Wilmot to have a higher fraction of growth in lower-density housing compared to the Region as a whole. We have used the Regional projections for simplicity and to illustrate how these densities may affect land needs. For this analysis, we have also assumed that Wilmot’s age distribution will remain the same as in the 2021 Census.

As shown in **Figure 9**, the Growth Share Low, Population Share, and Growth Share High projections resulted in an estimated 2051 Wilmot population of 25,452 people, 31,765 people, and 40,747 people, respectively. These would require 967, 3,434, and 6,943 additional homes, respectively (for simplicity, this analysis assumes existing homes retain their current populations).

	Growth Share Low	Population Share	Growth Share High
2051 Population	25,452	31,765	40,747
Growth in Population	2,475	8,788	17,770
Homes Needed	967	3,434	6,943

Figure 8: Housing Needs Based on Population Projections

These high-level calculations can serve as illustrative examples of how many homes may be required under different growth scenarios. As several factors suggest that population growth and housing demand in Wilmot may increase beyond historical averages, it may be prudent to be prepared for growth around or potentially beyond the upper end of these estimates.

Housing Typologies

New housing can take multiple forms, whether as detached homes, semi-detached homes, townhomes, and apartments. Housing can take different forms even in the same neighbourhood, contributing to a positive community environment and supporting more nearby retail establishments. Additional residential units (e.g., a basement apartment) further diversity the housing mix.

As discussed in Section 4.4, deriving housing policy from population projections likely reverses cause and effect as housing policy determines future population growth, and population projections are likely to be inaccurate as many key contributors to population growth are difficult to predict. Extending that logic, it is further challenging to break that down by housing type. The Regional Official Plan has a requirement for a proportion of housing units in forms other than detached dwellings, semi-detached dwellings, and townhouses. Historic trends in Wilmot have run opposite to this target, but are likely to change in some degree as intensification within Baden and New Hamburg is encouraged.

However, it may be helpful to consider some illustrative scenarios on how these population growth projections may materialize in the form of housing typologies, and what land needs would be required for each scenario. **Figure 10** shows these distributions of housing growth by housing typology that would be needed to meet the projections under the LNA Option 1 (Growth Plan minimum density of 50 people and

jobs per hectare in designated growth areas across Waterloo Region) and Option 2 (minimum density of 60 people and jobs per hectare) growth scenarios. As per the LNA, the housing typologies are defined as:

- Low density: singles and semi-detached
- Medium density: townhomes and apartments in duplexes
- High density: apartments and stacked townhouses

Illustrative Housing Growth	Growth Share Low	Population Share	Growth Share High
<u>Option 1</u>			
Low Density	428	1,519	3,072
Medium Density	227	809	1,628
High Density	582	1,628	4,183
<u>Option 2</u>			
Low Density	252	895	1,809
Medium Density	324	1,149	2,324
High Density	661	2,349	4,749

Figure 109: Housing Needs Based on Population Projections and LNA

Figure 11 shows how the lands that would be required under these housing growth scenarios, under the LNA Option 1 and Option 2 growth scenarios. These assumed average units per hectare of 20 (e.g., single-detached homes), 50 (e.g., townhomes), and 80 (e.g., low-rise apartments) for low, medium, and high density development



respectively. These land needs can come in the form of greenfield or intensification development typologies.

Illustrative Land Needs (hectares)	Growth Share Low	Population Share	Growth Share High
<u>Option 1</u>			
Low Density	20.0	71.0	143.6
Medium Density	3.7	13.1	26.4
High Density	4.8	17.0	34.4
Total	28.5	101.1	204.4
<u>Option 2</u>			
Low Density	12.5	44.2	89.4
Medium Density	5.5	19.5	39.4
High Density	5.5	19.7	39.8
Total	23.5	83.4	168.6

Figure 1110: Land Needs for Projected Housing Needs

It is important to consider that these land needs are dependent on policy choices as well as market conditions. Land use policies encouraging a different mix of low density, medium density, and high density development will result in different land use patterns. Additionally, what units per hectare the land use policies allow for a category (either directly or indirectly as a result of policies such as setbacks, lot coverage requirements,



floor area ratios, etc.) will also affect the land that would be required to meet the projected growth in households.

Notably, both Option 1 and Option 2 assume a significant proportion of low density development, representing single-detached and semi-detached homes. However, there has been a trend in the GTHA for more townhome developments over lower-density neighbourhoods. If this trend continues in Wilmot, it is possible that even less land may be needed to accommodate the projected population growth.

Two considerations will be important regarding land use policies around forms the new housing will take. The first is what the market conditions support, including a consideration of both construction costs and demand. Ground-related housing remains in high demand, especially as other urban areas in the Region approach full build-out. However, ground-related housing tends to be more expensive as they are usually larger and require more land. It is important for a range of housing typologies to be built, including townhomes and apartments, to create options for smaller and less land-intensive housing, which tends to be more affordable.

A second consideration is land use requirements. A key characteristic of rural areas is the large amount of farmland and environmental lands. Lower-intensity development types will encroach more into these types of lands.

It is difficult if not impossible to predict future market conditions and housing needs and wants. This is especially true as Wilmot is in transition, and historical intensification rates (under 10% apartments) may not reflect future intensification rates.

Setting the wrong intensification rate can have negative impacts on housing affordability. For example, zoning to restrict denser forms of housing could restrict supply below demand and reduce housing affordability. Similarly, setting an intensification target above what the market can support could also act as a constraint on housing. Allowing a broader range of housing typologies within the same zones as-of-right instead allows



homebuilders to better respond to local conditions, allowing more intensification where it is appropriate while not limiting growth overall.

4.6 Things to Think About

This section provides policy recommendations based on the findings of the previous sections.

Recommendation 1: Set and prioritize goals of housing policy

According to Oxford Languages, strategy is defined as “a plan of action or policy designed to achieve a major or overall aim.” To set housing policy strategically, the Township of Wilmot must first understand the goals which the policy aims to achieve. Potential policies can then be evaluated based on how well they achieve those goals. Setting goals in a transparent way can also provide predictability for both residents and developers.

For housing, this is especially important because there are numerous goals for housing policy (see Section 4.1), and they can conflict. It is especially helpful if a general understanding of the relative importance of the goals can be reached.

As goals are set, it is important to prioritize meeting housing demands and needs. It is important to recognize that the primary purpose of housing is to house people, not to enhance the public realm. It is important that this goal is not overlooked or otherwise de-emphasized as just one goal among many. Additionally, it is important to recognize that new housing improves housing affordability across the entire market system. It is recommended to avoid setting affordability targets for new housing which are too high that could instead impede new housing development and thus worsen housing affordability.

It may also be helpful to discuss the importance of protecting the interests of future residents. If this is a goal to be prioritized, special care must be taken to consider and



protect their interests as they often cannot advocate for themselves in public engagement.

Recommendation 2: Zone for Greater Density—in the Right Places

It is worth noting that several potential goals of housing policy could be achieved through zoning and developing with greater density. These included:

- Meeting housing demand and needs, improving housing affordability.
- Efficient servicing.
- Creating walkable downtowns and attracting retail (especially pedestrian-oriented retail).
- Protecting natural heritage and agricultural lands.

As such, it is likely that zoning for more density could be appropriate for Wilmot. The 2022 Waterloo Region LNA envisioned densities between 42 and 51 people and jobs per hectare for Wilmot. These should be adjusted as envisioned growth as well as priorities for Wilmot may differ from those assumed in the LNA.

This may take the form of allowing six-storey (or taller) apartments in the downtown areas and along major corridors, while allowing townhomes (and perhaps also low-rise apartments) in other lands of the Urban Areas. While 3- to 6-storey buildings may not traditionally have been prevalent in Wilmot, such buildings can be sited, designed, and constructed in a manner consistent with a small-town character. Before cars became prevalent, it was common for downtowns to be built upwards as they grew. These are especially prevalent in Europe. Historic sections of cities like Montreal and Quebec City, which were much smaller in the past, also feature these building typologies. A Township with a denser downtown surrounded by environmental and agricultural lands would likely retain more rural heritage and small-town character than a downtown surrounded by low-density residential subdivisions.

Higher-density construction can conflict with some goals, such as changing the physical character of the neighbourhoods and introducing shadow, privacy, and wind impacts. Additionally, care must be taken that sufficient infrastructure exists to support these developments. However, it is also important to accurately assess and weigh these impacts against other potential benefits.

Recommendation 3: Plan with Flexibility

It is difficult if not impossible to predict the future accurately, and it can be expensive and time-consuming to change planning policies. These difficulties can be mitigated by developing flexible policies.

For example, lands can be zoned with density greater than what is projected to be needed but also allow for lower-density development. This allows more housing (e.g., in the form of taller low-rise or short mid-rise apartments) to be built if housing needs are above what was forecast but also allows an appropriate amount of homes (e.g., in the form of ground-related housing) to be built if housing demand is lower than forecast.

Similarly, retail often relies on a critical mass of customers existing to be viable. Zoning that permits but does not require both residential and retail allows for efficient usage of land and for retail to be developed once the population to support it has arrived.

Building flexibility into land use policies allows developers to respond quickly to unforeseen conditions, to best meet the housing needs of both current and future residents.

5.0 Policy Directions

There are several emerging policy directions which should be considered based on the analysis in this discussion paper:

- Zone land flexibly to allow for multiple housing typologies and uses as of right. For example, the same neighbourhood can contain single-detached homes, semi-detached homes, townhomes, and low-rise apartment buildings. These neighbourhoods can have significant character and can also support nearby retail establishments. Zoning land to allow but not require both residential and retail can allow accessible neighbourhood retail nodes to emerge as residential densities become sufficient to support them.
- Allow and encourage higher densities (e.g., up to 6 or 8 storeys) in downtown areas. The higher population density would support more pedestrian-oriented retail, creating nodes of walkable mixed-use areas that provide significant amenities to residents.
- Consider and plan for a range of possible population growth and intensification outcomes. For example, an ideal case may be identified which preserves significant agricultural and greenfield land, while contingencies are made in case housing demand is higher than expected and/or the desired intensification rate cannot be supported by the market.
- Encourage growth in areas which can be serviced efficiently. This would likely center growth around New Hamburg and Baden. Limited growth may also be encouraged in other existing settlement areas such as Mannheim, Petersburg, and St. Agatha.
- Consider the need for more seniors housing and aging in place within Wilmot Township.



6.0 Next Steps

This Discussion Paper is one of seven papers that have been completed as part of Phase 2: Background Research and Study Preparation of the Township of Wilmot new Official Plan process. This paper establishes a foundation from which the Township has developed policy directions.

6.1 What We Heard Summary

The Discussion Papers were released in DRAFT form to inform public engagement in fall 2025. The Discussion Papers have been updated to reflect additional insights or items arising from public engagement and include thematic summaries of input received at and following the Background Studies Public Workshop that was held on October 22, 2025. This was a starting point for generating discussion about the importance of Urban Design in Wilmot Township.

Through engagement we heard the importance of protecting agricultural land, a desire for quality development, how an aging population factors into housing needs, and an interest in understanding the vacant residential land inventory and how it relates to Wilmot's parcel fabric and associated housing typology projections. An additional policy direction was added to consider Wilmot's aging population and a desire for more housing suitable for seniors. A companion engagement report was also prepared that will be presented to Township Council as part of the meeting required under Section 26 of the *Planning Act*.

6.2 Township Council Presentation under Section 26 of the *Planning Act*

This **FINAL** report includes recommended policy directions that will inform the development of the Township's new Official Plan. The Township Council meeting will be held on November 17, 2025, and is a requirement under Section 26 of the *Planning Act*.

This meeting is an open session to discuss revisions that may be required to the Township's Official Plan. The purpose of the meeting is to formally introduce the project,

inform the public and stakeholders of the new Official Plan Project, and provide an opportunity for feedback and input on the draft directions and objectives for Wilmot's new Official Plan.

It is one of several opportunities throughout this project where public input is needed and welcomed. Following the Township Council Presentation, the Project Team will begin the drafting of Wilmot's new Official Plan as part of Phase 3: Draft Policies and Land Use Maps.

The draft new Official Plan will be released for review in 2026 and includes public events in addition to the statutory *Planning Act* process. A full schedule of engagement activities for the project is outlined below.



Figure 12: Study Process and Engagement Opportunities