



**Township of Wilmot
REPORT**

NO: PB 2009-05
TO: Council
PREPARED BY: Harold O’Krafka, Director of Development Services
 Andrew Martin, Planner / EDO
DATE: March 2, 2009
SUBJECT: Response to First Draft of Region Official Plan - 2029

RECOMMENDATION:

That Report PB 2009-05 be endorsed and forwarded to the Region of Waterloo as the Township of Wilmot response to the First Draft of the Regional Official Plan 2029.

That the Township of Wilmot request the Regional Municipality of Waterloo to revise the proposed Regional Official Plan to address the recommendations resulting from the High Level Areas of Concern (summarized in Appendix B), and to respond to the Other Questions/Concerns (listed in Appendix C).

That the Township of Wilmot request the Regional Municipality of Waterloo to provide the Township of Wilmot with a written response indicating how the Region has addressed Wilmot’s response to the September 2008 Draft of the proposed Regional Official Plan 2029 prior to Regional Council’s final approval of the Regional Official Plan.

REPORT:

Background

As Council is aware the Region of Waterloo has circulated a draft Regional Official Plan (ROP) for comments. RMOW staff made a presentation of the highlights of the plan to Township Council late in 2008 and copies of the plan were provided to Council at that time.

While the Regional presentation highlighted a number of the progressive policies of the new document, this report is intended to highlight the areas of concern that Township staff have with the new document. There are many good policies within the new document and therefore it is important to note that the concerns of this report should not be misconstrued as criticism of the document as a whole.

The process of drafting the ROP has involved considerable staff time at both upper and lower tiers for many months. The Planner/EDO has served as a member of the ROP Municipal Working Group

and represented the Township's interests on a weekly basis. In addition, the CAO's and Directors of Planning have also met on several occasions to discuss areas of joint municipal concern. It is important that the dialogue between upper and lower tiers continue in the spirit of cooperation and realization that the ROP has a duty to provide not only for the growth of the Regional community, but also to provide for the growth of each lower tier community. The Plan will not be successful if it creates an environment of a few strong communities at the expense of others.

Projected Population Growth

One of the key components of the draft ROP is the distribution of anticipated population growth to the year 2029 and planning for its accommodation. The new ROP focuses on intensification of growth and by 2015 will see 40% of growth occurring within the existing urbanized areas of the Region.

Regionally, population is anticipated to increase from 509,040 in 2006 to 712,000 in 2029. Population growth in the Township of Wilmot is forecasted to increase from 17,580 in 2006 to 28,900 in 2029.

The Township has currently approved developments which will achieve a population of approximately 22,300 in 2016 which aligns with the population forecast of the 1995 ROPP. The additional 6600 persons represents the need to accommodate approximately 2000 additional units between Greenfield and Intensification opportunities.

Township Council can expect that the density of development in future Greenfield developments will need to be significantly higher than the large lot, low density developments such as Eby Crescent, Laschinger Boulevard and Sheppard Place. The community will need to embrace a variety of housing forms to achieve the higher densities required by the new ROP.

As part of the ROP process the Region has completed a land budget for the RMOW and determined that regionally there is sufficient land designated to accommodate the anticipated population growth. At the Regional scale however, planning does not reflect the disparity between municipalities who have consistently designated lands beyond their needs and those, such as Wilmot, who have designated lands more closely aligned with their actual needs.

As will be described in detail later in this report, the Township will need to ensure that sufficient Greenfield lands are provided to accommodate the forecasted population growth in such a fashion as to maintain the character of our rural communities.

In addition to the need to ensure sufficient land base exists, the Township is also actively working with the RMOW to ensure that sufficient sewage treatment capacity exists to accommodate growth. The rerating of the NH STP would increase the plant's capacity from approximately 5000m³/day to approximately 7500m³/day which would effectively provide sufficient capacity to accommodate growth in the Township to 2029.

Common Areas of Municipal Concern

As identified earlier the Area Municipalities worked together to provide the RMOW with a listing of common areas of concern. This collaboration on the development of seven 'Common Areas' of concern was productive and demonstrated that the lower tier can effectively work together towards

common goals. The Common Areas of concern listed below, and described in Appendix A, provide a description of the issues as presented to the RMOW.

1. Roles (Region vs Area Municipalities)
2. Implementation of Density Targets through Innovation.
3. Employment/Industrial Lands
4. Dominance of Rapid Transit
5. Time Horizon
6. Complete Communities
7. Commercial Planning

Wilmot - High Level Areas of Concern

In addition to the Common Areas of Municipal Concern, each municipality has provided its own listing of High Level Areas of Concern. Some duplication between the lists occurs as each municipality endeavours to ensure its success within the Regional structure. The recommendations with regards to high level areas of concern are summarized in Appendix B.

Role of the Region vs Area Municipalities (Chapter 1 and 10)

Township staff believe that the Regional Official Plan should clearly and concisely recognize that land use planning in the Region is a shared responsibility between upper and lower tiers.

In Chapter 1 of the ROP, Township staff recommend that a new third paragraph be added as follows:

The ROP recognizes that land use planning in the Region is a shared responsibility between the Regional Municipality and the Area Municipalities. Within the context of this shared responsibility for land use planning, the ROP seeks to be broad and strategic while generally acknowledging that detailed implementation and community planning are roles most appropriately carried out by the Area Municipalities. In this way the Region intends to provide value and leadership within the land use planning framework and avoid duplication with the Area Municipalities. Within this land use planning framework the Region and the Area Municipalities can thus achieve distinct but mutually supportive roles which will ensure the planning process is effective by being responsive, accessible and accountable.

This wording was developed by Woolwich Township staff and discussed at CAO/Director of Planning meetings as well as at the Municipal Working Group meetings. There was broad support for its inclusion by all area municipalities and its intent is to clarify the roles of the Region and the area municipalities.

In Chapter 10 of the draft ROP Township staff further recommend that a new objective be added as follows:

Provide a broad, strategic Regional policy framework in which detailed implementation and community planning will be generally carried out by the Area Municipalities.

A key component of highlighting the role of the Area Municipalities in implementing the broad strategic plans of the Region is the delegation of approval authority for plans of subdivision, plans of

condominium, part lot control exemption and local Official Plan Amendments consistent with all other Regional governments throughout the Province of Ontario.

Township staff strongly believe that delegation will streamline the approvals process by eliminating duplication of effort. Within the Region of Waterloo, the City of Kitchener has been delegated such approval and staff are unaware of any issues in the ability of the City to address and include issues of Regional significance. The Township of Wilmot should be afforded the same opportunity as the City of Kitchener in this regard.

The Township of Woolwich and the City of Cambridge together with Wilmot Township have indicated that they wish to seek the delegation of approval authority and have further collectively requested that the ROP contain wording to specifically demonstrate the commitment of Regional Council to permit such delegation in the interest of a more efficient planning system.

Township staff recommend the inclusion of a new policy after Policy 10.A as follows:

10.B. Area Municipal Roles

10.B.1 Consistent with the Region's role of providing a broad, strategic Regional policy framework in which detailed implementation and community planning will be generally carried out by the Area Municipalities, Regional Council will allow for:

- (a) Delegation, to area municipalities, of subdivision, condominium and part lot control exemption by-law approval authority; and,*
- (b) Exemption of local official plan amendments which conform to the Regional Official Plan from requiring Regional approval.*

Urban Reserve / Countryside Line (Policy 2.B.6, Map 3c, Map 7)

The Township of Wilmot has clearly and consistently requested that the RMOW identify the lands between Snyder's Road/Waterloo Street and Highway 7 & 8 as the location of future growth within the Township of Wilmot.

Council has forwarded resolutions to this effect from the outset of the Regional Growth Management Strategy, specifically Report PB 2002-31 in July of 2002 and Report PB 2003-07 in March of 2003. The RMOW response has consistently been the placement of an asterisk between Baden and New Hamburg to identify the need for refinement of the Countryside Line in this area.

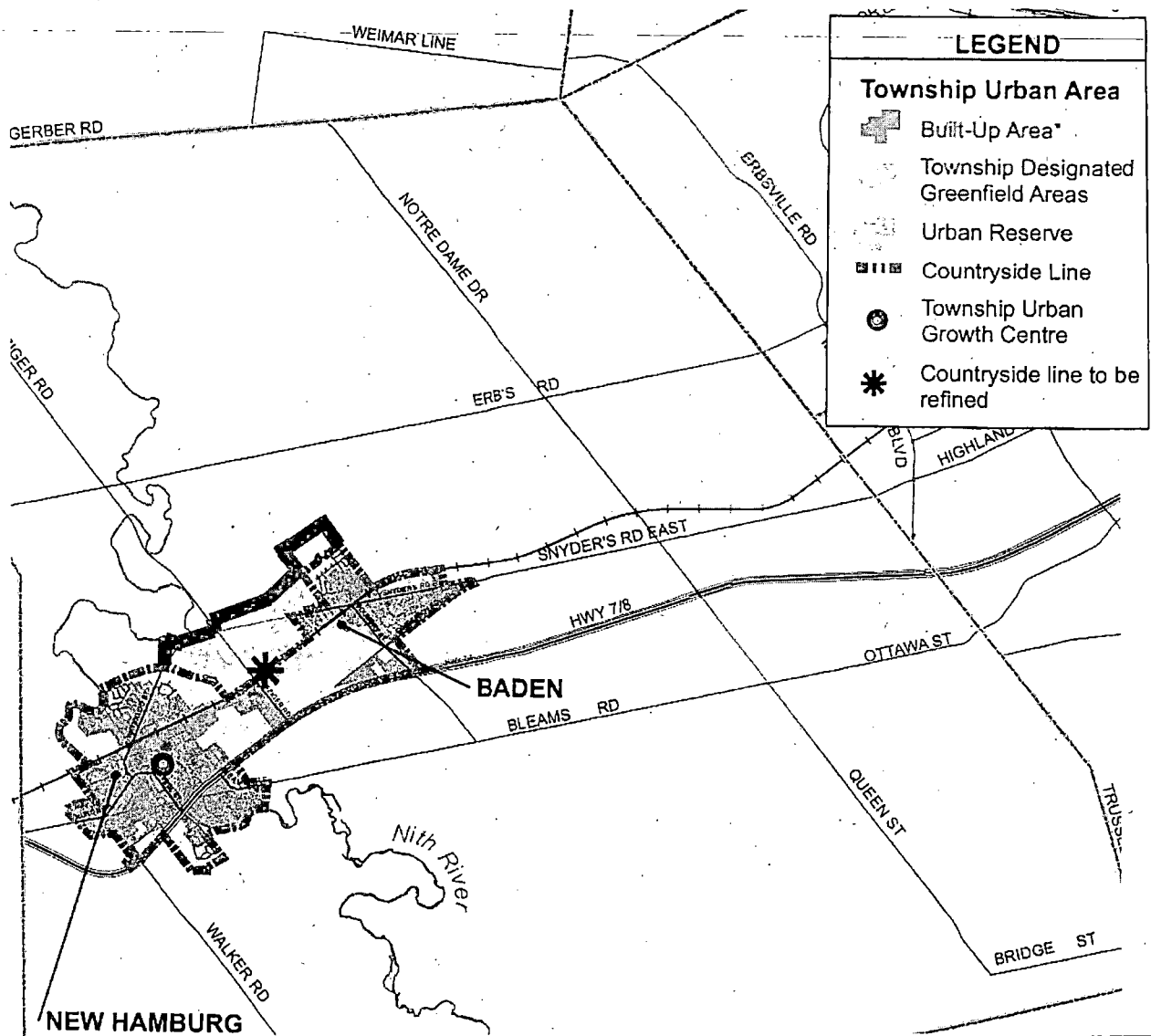
The intention of the Countryside Line and the Urban Reserve designation is to identify lands beyond the current planning period which hold potential for future growth. The corridor between Baden and New Hamburg is punctuated with existing urban encroachment (the Luxembourg Settlement Area, the railway, the WRC, Waterloo-Oxford DSS, the future Wilmot Public School site, the significant Steinmann Mennonite Church facility and numerous non-farm residential lots). Existing sewer and water mains run between Baden and New Hamburg within this corridor along with other significant utility infrastructure making inclusion within an Urban Reserve designation logical for long range planning

Township staff continue to advocate that this area be enclosed within the countryside line and identified as Urban Reserve to allow for proper long term planning within the community to occur. Inclusion of additional lands within the Countryside Line and Urban Reserve designation does not offend the intent of the P2G document as it does not introduce any new Greenfield designation at

this time. Indeed rather it simply recognizes Wilmot's ongoing attempts to focus growth internally between the two settlements and allows for lands to be included in "long-range planning and infrastructure studies to evaluate their potential to accommodate growth" as discussed in Policy 2.B.7 of the draft ROP.

During the collaboration between RMOW and Township staff in writing the Township OP in 2003, it was clearly understood that the lands removed by the Township from Special Study Areas to the west and south of New Hamburg were to be identified instead within the corridor between Baden and New Hamburg as the focus for long term growth.

Township staff therefore recommend that Map 3c and 7 be modified such that the Countryside Line between Baden and New Hamburg be defined as a line running from the northerly limit of the Activa property to northerly edge of the Steinmann Church property and then along the centre line of Waterloo Street, including the Luxembourg Settlement and terminating at the easterly edge of New Hamburg as illustrated in the modified rendering below.



Township staff are concerned with the wording of Policy 2.B.6 (a) and its implications with respect to the limitations on long term planning for Baden and New Hamburg. This policy states that where the Township Urban area becomes coincident with the Countryside Line, infrastructure and urban design measures will be implemented to ensure the Countryside Line remains a fixed boundary. Several registered and draft approved plans of subdivision abutting the draft Countryside Line and the Countryside Line as modified by the Township of Wilmot above, have been designed such that future development may logically be extended from these developments. It is the Township's intention to maintain this practice through the approval of any future Greenfield development. Township staff suggest that a policy curbing any future consideration for expansions to the Countryside Line does not represent the best interests for long term planning exercises. Should future changes to the Countryside Line occur, prior approval of development adjacent to the existing boundary without consideration to potential future expansion would result in poorly planned and disjointed development.

Policy 2.B.6 (b) allows that the eastern most portion of the Countryside Line (adjacent to Shantz Station Road) be designed for potential urban expansion eastwards to accommodate long-term growth if additional lands are required beyond the Urban Reserve. This policy essentially demonstrates that long term planning exercises need to consider potential for future expansions to the Countryside Line; unfortunately the ROP limits this consideration to an area east of Shantz Station Road. As provided in the outset of this report, the ROP will not be successful if it creates an environment of a few strong communities at the expense of others.

Township staff recommend that Policy 2.B.6 (a) and (b) be deleted in order that planning for potential future development beyond the Countryside Line not be excluded, while at the same time not predetermining where potential future expansions may occur without necessary planning analysis and justification.

Constrained Designated Greenfields

Tied to the confirmation of the Countryside Line and the identification of the Urban Reserve for Wilmot Township is the need to recognize, within the policies of the ROP, that the Designated Greenfields within New Hamburg and Baden are significantly constrained by the flood plains of the Nith River and Baden Creek.

These constraints must be acknowledged with provisions permitting the swapping of constrained Greenfields for unconstrained lands within the Urban Reserve. The effect would result in no net gain of Designated Greenfields therefore complying with the intent of P2G while at the same time providing Wilmot Township with sufficient lands to accommodate its projected population to 2029 and beyond.

Township staff recommend that specific policies be included in the ROP to acknowledge that the transfer of constrained Greenfield designations within Baden and New Hamburg to locations within the Urban Reserve, provided that no net gain of Designated Greenfields within the Planning Horizon will be permitted.

Township Urban Growth Centres (Policy 2.D.1 and Map 3C)

The Township Urban Growth Centre in New Hamburg identified on Map 3c is shown in the core of New Hamburg where there are significant floodplain restrictions combined with the New Hamburg

Heritage Conservation District. Map 3c also does not identify a Township Urban Growth Centre for Baden and staff suggest that such identification would be appropriate given the considerable potential for higher order redevelopment of the traditional Baden core.

Township staff have suggested that the Region provide flexibility when the Township of Wilmot prepares the precise mapping to designate the boundaries of the Township Urban Growth Centre. In a similar fashion to Cambridge (having three), the Township of Wilmot has two significant independent urban communities both of which require the identification of a Township Urban Growth Centre. It is also important to note that the New Hamburg Township Urban Growth Centre is constrained and cannot therefore simply follow the traditional core area designation.

In this regard, Township staff recommend that Policy 2.D.1 be modified to provide that although Township Urban Growth Centres generally coincide with traditional core areas, Area Municipalities may designate a Township Growth Centre beyond the limits of the traditional core to the extent deemed appropriate by the Area Municipality.

Township Staff further recommend that the Township Urban Growth Centre identifier on Map 3c be modified to reflect a more generalized designation not specifically tied to the traditional core and that an additional identifier be added to the Baden Township Urban Area.

Alternative/Renewable Energy Systems (Policy 3.D.6 and 3.D.8)

The 2005 Provincial Policy Statement (PPS) provides that alternative and renewable energy systems are permitted within settlement areas, rural areas and prime agricultural areas. Within rural and prime agricultural areas the PPS stipulates that these systems should be designed and constructed to minimize impacts on agricultural operations.

Policy 3.D.6 of the ROP defines on-site alternative/renewable energy systems as smaller scale, non-commercial systems intended to offset or replace domestic energy consumption. This Policy allows such systems to be established within Prime Agricultural and Rural Areas. The PPS extends this allowance to settlement areas. ROP Policy 3.D.6 stipulates that the systems will be regulated by Municipal zoning regulations and applicable Provincial and Federal regulations. Township staff would suggest that in addition to regulating the systems, the Area Municipalities should also have the ability to consider whether these systems would be appropriate within an Urban/Township Urban Area or Rural Settlement setting. This provision would accommodate the incorporation of alternative/renewable energy systems within the planning/urban design of new development. At the same time, Area Municipalities, through refined zoning regulations, would have the opportunity to exclude such systems as deemed inappropriate.

Township staff recommend that Policy 3.D.6 be modified to allow on-site alternative/renewable energy systems within Urban Areas, Township Urban Areas, and Rural Settlement Areas in addition to Prime Agricultural and Rural Areas consistent with the policies of the PPS.

Policy 3.D.8 of the ROP defines larger-scale alternative/renewable energy systems as commercial systems that are primarily intended to supply electricity to the electrical transmission grid. These systems would be permitted within the Prime Agricultural and Rural Area subject to a site specific zoning by-law amendment. The policy sets out studies required in support of a zone change application one of which requires demonstration that the system will be designed and constructed to minimize the impact on surrounding agricultural operations and to maximize the opportunity for conversion back to agricultural use. Township staff are concerned that this policy does not have

regard for removal of productive agricultural land. Under the proposed policy framework, subject to the approval of required studies, a large-scale system could be established on a prime agricultural parcel, removing all land from productivity, provided it does not impede the ability to continue agricultural operations on neighbouring properties. The policy does not give consideration to the cumulative impact of multiple systems on multiple properties and long term impacts on agricultural viability. Township staff suggest that determining the benefits of alternative/renewable energy over preservation of agricultural land has Regional implications and as such should be given more direction within the ROP.

Township staff recommend that Policy 3.D.8 be expanded upon, or a new policy created to consider, at minimum, the cumulative impact of larger-scale alternative/renewable energy systems on agricultural viability, the number of systems within the Region appropriate without impacting the primary purpose of prime agricultural lands to be used for agricultural purposes, and a requirement that lands of lesser agricultural potential be given priority over active prime agricultural lands.

Elimination of Rural Residential Development Potential through Exclusion of Communal Septic Systems as a Wastewater Servicing Option (Policy 3.G.2)

Policies within the draft ROP eliminate the potential for consideration of communal sewage disposal systems. Regional staff cite cost as the primary reason for this policy direction which is of concern to Township staff.

Lands on the east side of New Dundee have been identified for growth since 1980 and have historically been counted on as supplying designated Greenfield lands for future Township growth.

The indirect elimination of these lands as having development potential impacts not only the Township but also the New Dundee community. In particular it has been anticipated in various planning activities that residential growth on these lands will assist in sustaining the enrollment numbers at the New Dundee Public School. The school serves as an integral part of the community in this relatively isolated community and its survival is important to the Township.

To this end Township staff would prefer to see a policy environment which provides for communal systems to be permitted in rural communities such as New Dundee.

Failing that, and recognizing that the New Dundee lands were included as part of the 1997 Township Residential Growth Strategy completed with RMO staff prior to the Township Official Plan in 2003, provision should be made for the removal of the residential designation from the New Dundee lands and an equivalent area be designation within the Township Urban Area or Urban Reserve to ensure that Greenfield opportunities in Wilmot are not lost.

Township staff recommend that the Region revise Section 5.G by modifying Policy 5.G.2 to add new communal wastewater treatment systems as a servicing option and by adding a new policy regarding Communal Wastewater Treatment Systems that would limit their use to existing designated lands within Rural Settlement Areas.

Alternatively, should communal systems continue to be excluded, Township staff recommend that the Region provide policies to permit the transfer of the New Dundee Greenfield lands to the Township Urban Area or Urban Reserve within Wilmot to ensure that the Township of Wilmot does not lose residential Greenfield potential.

Protected Countryside Designation (Policy 6.B and Map 7)

The draft ROP introduces a new layer of policies identified as the Protected Countryside which Regional staff have described as a "Made in Waterloo Region" greenbelt. The Protected Countryside's stated purpose is to recognize and protect a continuous band of permanent agricultural areas, various natural features/systems and the Regional Recharge Area from future urban development.

Township staff are concerned at the introduction of Greenbelt style policies without the benefit of considering the results of Provincial level Greenbelt initiatives. The Provincial Greenbelt policies provide for a 10 year review of the pros and cons of such protection and staff suggest that Regional efforts to establish a Greenbelt are premature in the absence of the results from that review.

Staff are concerned that the Provincial level efforts provide for lower tier municipalities to voice their opposition and 'opt out' of future extensions of the Greenbelt while the ROP level policies make no such provision.

Township staff recommend that Policy 6.B be deleted together with the associated mapping of the Protected Countryside on Map 7.

Institutional Expansions (6.C.4, 6.C.5, and 6.D.2)

Policy 5.1.5.2 of the current ROPP allows minor additions to, intensification of, and minor changes to existing industrial, commercial, recreational and/or institutional uses outside of Rural Settlement Areas. This policy also allows minor expansion to existing lot areas subject to listed criteria. Under this policy, Steinman Mennonite Church was able to acquire the abutting non-farm residential property to facilitate its multiple phased expansion plans.

In both Prime Agricultural and Rural Area designations, Policy 6.C.5 of the draft ROP limits intensification and minor changes of use of existing operations to the limits of the existing property and no longer allows lot area expansions within the Prime Agricultural Area designation.

Excepting "the rural community that rely on horse-drawn vehicles as their primary means of transportation" described in Policy 6.C.4, the ROP only permits the establishment or expansion of rural institutional uses, in Rural (formerly Non-prime) Areas as stipulated in Policy 6.C.5.

A rural institutional use is defined in the draft ROP Glossary as institutional uses related to and directly serving the needs of the rural community, such as schools, places of worship, and rural community centres. Given the continued importance of rural institutional uses for all religious affiliations, the ability for expansion of these uses should not be limited to the Mennonite population reliant upon horse-drawn vehicles.

Township staff recommend that a new Policy be inserted after Policy 6.C.5 to permit the expansion of a rural institutional use by amendment to the Area Municipality's zoning by-law within the Prime Agricultural Area designation. This policy would duplicate Policy 6.D.2, excepting the removal of the reference to "establishment" and re-wording criteria (a) from Rural Area to Prime Agricultural Area.

Regional Cycling Routes (Map 5C)

In October of 2008 Township staff forwarded a letter to the Region of Waterloo requesting consideration of the inclusion of additional on-road cycling links within the Township to provide better linkages between communities, off-road trail facilities and the cities of Kitchener and Waterloo.

Consistent with that request Township staff recommend that Map 5c of the ROP be updated to show the following:

1. A linkage from the west limit of Baden, past Waterloo-Oxford DSS, to the intersection with Nafziger Road to promote cycling between the two communities and to and from the high school and future public school.
2. A linkage from Nafziger/Snyder's Road south to Bleams Road to link the communities of Baden and New Hamburg to the Wilmot Recreation Facility.
3. A linkage from Baden to Petersburg to Kitchener to link rural residents and city residents to off-road cycling/hiking facilities in the Petersburg area.
4. A linkage from St. Agatha to Petersburg to New Dundee to provide an easterly north-south linkage to off-road cycling/hiking facilities in the Petersburg Area.
5. A linkage between Erb's Road and Gerber Road in addition to the Sandhills Rd (Twp) link – this could either be a link along Nafziger Road from Philipsburg to Wellesley or St. Agatha to Moser-Young Road.

Inclusion of Mannheim within Urban Area (Map 7)

Notwithstanding the partial servicing of the Mannheim Settlement utilizing sewage capacity within the City of Kitchener, staff do not support Mannheim's identification as Urban Area on Map 7 and recommend that the mapping be revised to identify the Mannheim Settlement as Prime Agricultural Area in similar fashion to the identification of St. Agatha and New Dundee.

Wilmot – Other Questions/Concerns

In addition to the High Level Areas of Concern, there are a number of more general areas of concern and questions which staff recommend be addressed within the final version of the ROP. These questions and concerns are summarized in Appendix C.

Summary

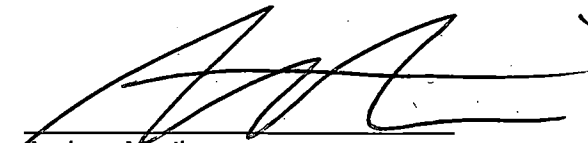
In summary, these comments and recommendations represent Wilmot's response to the first draft of the new ROP.

RMOW staff have attempted to provide opportunities for collaboration on the development of the document and Township staff are appreciative of this. Having said that, the Township requires significant consideration of its concerns to ensure that growth and development of Wilmot Township does not stagnate between 2016 and 2029. The ROP should promise prosperity for all

communities within the Region and ensure that sufficient opportunity exists for each community to be "complete".

A second draft of the ROP is anticipated in the coming months and the second draft will hopefully address the concerns of Wilmot.

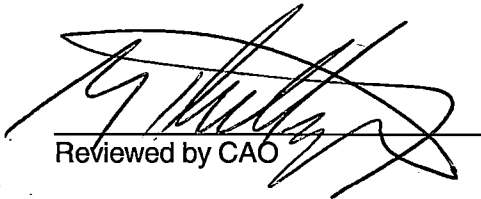
Upon its approval the new ROP will trigger the review and update of our local Official Plan to bring it into conformity with the upper tier plan and to incorporate other opportunities afforded by recent changes in Provincial Planning legislation.



Andrew Martin
Planner / EDO



Harold O'Krafka, MCIP, RPP
Director of Development Services



Reviewed by CAO

APPENDIX A

Draft Regional Official Plan 2029 Common Areas of Concern

The Cities of Cambridge, Kitchener, and Waterloo and the Townships of Wilmot and Woolwich appreciate being given the opportunity to comment on the first draft of the Regional Official Plan 2029.

We have not had the opportunity to touch base with North Dumfries and Wellesley to find out if they concur.

We wholeheartedly support the overall vision of creating more compact urban communities that have more transportation choices, including a new Rapid Transit System.

We also recognize that the draft Regional Official Plan (ROP) includes many new policy initiatives that are required by the planning framework of the Government of Ontario.

However, several aspects of the draft ROP give rise to concern. Below is a summary of seven common areas of concern that require more discussion before moving forward.

1. Roles (Region versus area municipalities)

The draft ROP represents a fundamental shift from the current ROPP regarding the Region's role in municipal planning. The draft ROP would have the Region involved in many areas of detailed local planning. There are numerous examples related to urban design. Other examples include Regional direction on parking standards and the location of small food stores. Not only are these planning matters outside of the Region's traditional jurisdiction, but there is concern that the Region does not have the resources to effectively carry out these responsibilities, in which case significant delays would result.

The draft ROP is also very directive. Area municipalities are directed to implement very prescriptive policies throughout the document, but especially in Chapter 2. This format leaves little opportunity for independent decision making by the area municipalities.

The Region should maintain a strategic role in Planning but detailed municipal planning should be left to the local municipalities. This is necessary to make the planning system more efficient and to avoid duplication.

2. Implementation of Targets through Innovation

More information is needed on how the Region, together with area municipalities, will implement the policies related to density and infill targets. The draft ROP gives the impression that the Region is taking a "one-size-fits-all" approach so that there is little opportunity for local differentiation and innovation. For example, will every individual plan of subdivision in designated Greenfield areas have to meet minimum density targets? It should be possible to have variations to address site-specific circumstances, as long as the overall average meets the targets.

3. Employment/Industrial Lands

There is concern that the employment lands budget puts too much emphasis on a quantitative approach and insufficient emphasis on qualitative aspects of land supply and market forces.

The long-range plan for employment lands leaves too few options for future industrial lands growth. The draft ROP puts all of our industrial lands "eggs" in "two baskets": East Side for serviced employment lands and Hwy 401/97 for unserved employment lands.

The East Side lands are already appearing to be less viable than when the RGMS was adopted. If the East Side must be developed as a complete community with other lands uses than maybe we need to consider additional locations for serviced industrial land. We now know that the Cambridge portion of the East Side lands have many constraints and the owners of large parcels in the Woolwich portion are intent on doing residential development. What happens if they are successful at the O.M.B.? Are the East Side lands the best location for a new, complete community in Waterloo Region? Have other locations for complete communities been considered?

4. Dominance of Rapid Transit

We support the Rapid Transit initiative and agree that it can be a catalyst for shaping Waterloo Region's urban communities. However, so many policies are dependent on Rapid Transit being constructed somewhere in the Central Transit Corridor, yet the EA has not been finalized and construction is not assured. At the very least, the ultimate alignment and form of rapid transit (technology) should be known before finalizing the location of Reurbanization Corridors and Planned Transit Corridors. Also, it is unclear what is envisioned for urban areas removed from transit corridors. The East Side lands and other employment lands appear to be poorly linked to Planned Transit Corridors. Is there a contingency plan in the event that Rapid Transit is delayed significantly or indefinitely?

5. Time Horizon

We agree that the current provincial policy framework restricts urban land needs decisions to a 20-year planning horizon. However, as a high level policy document, the ROP should look beyond 2029 in the case of major strategic considerations, but in a way that does not unduly and prematurely fuel expectations and speculation. There is opportunity to expand the existing framework for urban land reserves. Future expansions to Rapid Transit (beyond the Central Transit Corridor), long range water supply and wastewater treatment, are other strategic areas where looking beyond 2029 would be beneficial.

6. Complete Communities

The concept of complete communities is a good one and represents good planning. However, clarification is needed in order to understand at what scale it is being implemented and for what purpose. The term is used on several occasions but it is not clear if "community" refers to the Region, the area municipalities, communities within area municipalities or neighbourhoods.

7. Commercial Planning

Insufficient detail is paid to higher order, Regional-scale commercial development. More analysis and direction is necessary. However, consistent with other comments, the Regional direction should be strategic and provide flexibility for innovation at the local level.

APPENDIX B

Summary of Recommendations with respect to Wilmot - High Level Areas of Concern

Recommendation 1 (Role of the Region vs Area Municipalities)

In Chapter 1 of the ROP Township staff recommend that a new third paragraph be added as follows:

The ROP recognizes that land use planning in the Region is a shared responsibility between the Regional Municipality and the Area Municipalities. Within the context of this shared responsibility for land use planning, the ROP seeks to be broad and strategic while generally acknowledging that detailed implementation and community planning are roles most appropriately carried out by the Area Municipalities. In this way the Region intends to provide value and leadership within the land use planning framework and avoid duplication with the Area Municipalities. Within this land use planning framework the Region and the Area Municipalities can thus achieve distinct but mutually supportive roles which will ensure the planning process is effective by being responsive, accessible and accountable.

In Chapter 10 of the draft ROP Township staff further recommend that a new objective be added as follows:

Provide a broad, strategic Regional policy framework in which detailed implementation and community planning will be generally carried out by the Area Municipalities.

Recommendation 2 (Delegation of Authority to Area Municipality)

Township staff recommend the inclusion of a new policy after Policy 10.A as follows:

10.B Area Municipal Roles

10.B.1 Consistent with the Region's role of providing a broad, strategic Regional policy framework in which detailed implementation and community planning will be generally carried out by the Area Municipalities, Regional Council will allow for:

- (c) Delegation, to area municipalities, of subdivision, condominium and part lot control exemption by-law approval authority; and,*
- (d) Exemption of local official plan amendments which conform to the Regional Official Plan from requiring Regional approval.*

Recommendation 4 (Urban Reserve / Countryside Line)

Township staff recommend that Map 3c and 7 be modified such that the Countryside Line between Baden and New Hamburg be defined as a line running from the northerly limit of the Activa property to northerly edge of the Steinmann Church property and then along the centre line of Waterloo Street, including the Luxembourg Settlement and terminating at the easterly edge of New Hamburg.

Township staff recommend that Policy 2.B.6 (a) and (b) be deleted in order that planning for potential future development beyond the Countryside Line not be excluded, while at the same time not predetermining where potential future expansions may occur without necessary planning analysis and justification.

Recommendation 5 (Constrained Designated Greenfields)

Township staff recommend that specific policies be included in the ROP to acknowledge that the transfer of constrained Greenfield designations within Baden and New Hamburg to locations within the Urban Reserve, provided that no net gain of Designated Greenfields within the Planning Horizon will be permitted.

Recommendation 6 (Township Urban Growth Centres)

Township staff recommend that Policy 2.D.1 be modified to provide that although Township Urban Growth Centres generally coincide with traditional core areas, Area Municipalities may designate a Township Growth Centre beyond the limits of the traditional core to the extent deemed appropriate by the Area Municipality.

Township staff further recommend that the Township Urban Growth Centre identifier on Map 3c be modified to reflect a more generalized designation not specifically tied to the traditional core and that an additional identifier be added to the Baden Township Urban Area.

Recommendation 7 (Alternative/Renewable Energy Systems)

Township staff recommend that Policy 3.D.6 be modified to allow on-site alternative/renewable energy systems within Urban Areas, Township Urban Areas, and Rural Settlement Areas in addition to Prime Agricultural and Rural Areas consistent with the policies of the PPS.

Township staff recommend that Policy 3.D.8 be expanded upon, or a new Policy created to consider, at minimum, the cumulative impact of larger-scale alternative/renewable energy systems on agricultural viability, the number of systems within the Region appropriate without impacting the primary purpose of prime agricultural lands to be used for agricultural purposes, and a requirement that lands of lesser agricultural potential be given priority over active prime agricultural lands.

Recommendation 8 (Elimination of Rural Residential Development Potential through Exclusion of Communal Septic Systems as a Wastewater Servicing Option)

Township staff recommend that the Region revise Section 5.G by modifying Policy 5.G.2 to add new communal wastewater treatment systems, and by adding a new policy regarding Communal Wastewater Treatment Systems that would limit their use to existing designated lands within Rural Settlement Areas;

Alternatively, should communal systems continue to be excluded, Township staff recommend that the Region provide policies to permit the transfer of the New Dundee Greenfield lands to the Township Urban Area or Urban Reserve within Wilmot to ensure that the Township of Wilmot does not lose residential Greenfield potential.

Recommendation 9 (Protected Countryside Designation)

Township staff recommend that Policy 6.B be deleted together with the associated mapping of the Protected Countryside on Map 7.

Recommendation 10 (Institutional Expansions)

Township staff recommend that a new Policy be inserted after Policy 6.C.5 to permit the expansion of a rural institutional use by amendment to the Area Municipality's zoning by-law within the Prime Agricultural Area designation. This policy would duplicate Policy 6.D.2, excepting the removal of the reference to "establishment" and re-wording criteria (a) from Rural Area to Prime Agricultural Area.

Recommendation 11 (Regional Cycling Routes)

Township staff recommend that Map 5c of the ROP be updated to show the following:

1. A linkage from the west limit of Baden, past Waterloo-Oxford DSS, to the intersection with Nafziger Road to promote cycling between the two communities and to and from the high school and future public school.
2. A linkage from Nafziger/Snyder's Road south to Bleams Road to link the communities of Baden and New Hamburg to the Wilmot Recreation Facility.
3. A linkage from Baden to Petersburg to Kitchener to link rural residents and city residents to off-road cycling/hiking facilities in the Petersburg area.
4. A linkage from St. Agatha to Petersburg to New Dundee to provide an easterly north-south linkage to off-road cycling/hiking facilities in the Petersburg Area.
5. A linkage between Erb's Road and Gerber Road in addition to the Sandhills Rd (Twp) link – this could either be a link along Nafziger Road from Philipsburg to Wellesley or St. Agatha to Moser-Young Road.

Recommendation 12 (Inclusion of Mannheim within Urban Area)

Township staff recommend that the Map 7 be revised to identify the Mannheim Settlement as Prime Agricultural Area in similar fashion to the identification of St. Agatha and New Dundee.

APPENDIX C

Wilmot – Other Questions/Concerns

Policy 1.C (2nd paragraph)

Suggest moving “once approved” from the beginning of the sentence to the end of the sentence. The current wording suggests that “once approved” is referencing the Planning Act.

Policy 2.B

If transit is a major focus in the planned community structure, why is no wording included or mapping (5a) provided for a conceptual transit linkage to the Township Urban Areas? Wording and mapping could be provided to emphasize that transit is conceptual and not planned, but at least it shows foresight for an east-west connection.

The reference to Township Urban Growth Centres as focal points for reurbanization in paragraph 2 is only satisfactory if the recommendations regarding Township Urban Growth Centres within the Wilmot High Level Areas of Concern are satisfactorily addressed.

Policy 2.C.19 (i)

The Township supports this concept, but would like commitment that the Region will support front lotting on Snyder’s Road E and W, and Waterloo Street between Baden and New Hamburg to reflect the “main street” function of this road between the communities. Regional transportation issues infused into the Baden West development process did not support this policy.

Policy 2.D

Paragraph 1 should separate Baden and New Hamburg as “Baden, New Hamburg” not “Baden/New Hamburg”.

Policy 2.F.6

If the reference to food store size is to ensure compatibility of land use, the idea of allowing small and medium sized food stores in proximity to residential areas is supported. The policy seems to suggest, however, that only small and medium sized stores are the source of fresh produce and healthy foods. Large stores provide equal or greater access to these products. Perhaps reference should be given to access to other essentials such as clothing, first aid and medicine products. If only small and medium sized food stores are made accessible by transit, walking and cycling, presumably individuals would still use their car to drive for other essential products. Large stores offer more of these products in one location perhaps limiting the requirement for multiple trips.

Policy 2.F.7

The reference to Township Urban Growth Centres as a location for new commercial centres is only satisfactory if the recommendations regarding Township Urban Growth Centres within the Wilmot High Level Areas of Concern are satisfactorily addressed.

Policy 3.F.3, 3.F.4, and 3.F.12

References to “will” should be changed to “are encouraged to” given that identification of cultural heritage resources and landscapes should remain primarily a local mandate.

Policy 5.C.1

The preparation and establishment of parking strategies is a local mandate and, as such, the reference to “will” should be changed to “are encouraged to”.

Policy 5.E.2

Refer to comments on Policy 2.C.19 (i). The Region should ensure that Region's Transportation Corridor Guidelines and Access By-law Implementation Guidelines allow continuation of the "main street" between Baden and New Hamburg.

Chapter 6

The last paragraph on Page 62 should be removed based on the recommendations regarding the Protected Countryside Designation within the Wilmot High Level Areas of Concern.

Policy 6.C.6

Agriculturally related uses should not require a site specific zoning amendment given that they are already permitted and regulated by the Township Zoning By-law (farm related occupations). The current ROPP does not require a zoning amendment; this policy should be the same as 6.C.7.

Policy 6.D.1

Overnight accommodations are acceptable within in campgrounds and bed and breakfasts; this policy suggests otherwise.

Policy 6.G.3

This policy should be removed. The part of the lot already located within the Rural Settlement Area is already impacted by MDS II and cannot be used for agricultural purposes. The part of the lot located outside of the Rural Settlement Area is already impacted by the Settlement Boundary (MDS II) and therefore severing a lot within the settlement boundary would have no new impact on the agricultural land. This policy serves no purpose other than to prevent infilling lot creation within Rural Settlement Areas – a concept that is otherwise allowed within the plan, specifically by policy 6.G.5.

Map 3a, 3c, 3e, 4, 5a, 5b, 5c, 6a, 6b, 7, and 8

Ottawa Street is not located in Wilmot Township; the Ottawa Street label should be moved to Kitchener and/or replaced with Bleams Road.

Map 5a

Show conceptual east west transit linkage to Baden and New Hamburg

Schedule A

Regional Road 4 is Bleams Road, not Bleams Road E; the Schedule should be changed to reflect the correct name.