



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

August 4, 2023

Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3

Provincial Land Use Plans Branch  
Ministry of Municipal Affairs and Housing  
13<sup>th</sup> Floor, 777 Bay St  
Toronto, ON  
M7A 2J3

Dear Minister Clark:

**RE: ERO 019-6813 - Review of Proposed Policies Adapted from A Place to Grow and Provincial Policy Statement to Form a New Provincial Planning Policy Instrument Request for Modification - Submission on behalf of C & A Wiebe Farms, 1056 Snyders Road West, Township of Wilmot, Regional Municipality of Waterloo  
OUR FILE 17303A**

We are writing on behalf of our client, C & A Wiebe Farms Limited, with respect to the Ministry's review of the proposed new Provincial Planning Statement.

Our client owns lands within the Township of Wilmot, which is a lower tier municipally within the Region of Waterloo. The property is located on the north side of Snyders Road; adjacent to existing and planned residential development within the Baden Township Settlement Area. The subject lands have a total area of approximately 42.2 hectares and include an existing single detached dwelling, barn and outbuildings.

The southern portion of the lands, comprising approximately 18.03 hectares are located within the Baden Township Settlement Area. This includes the area where the existing house and other buildings are located. The northern portion of the lands is approximately 24.17 hectares in area and is farmed for cash crops. No commercial livestock operations are located on the property.

As illustrated on the air photo below, the subject lands are located in proximity to both existing and planned residential development. While not evident on the air photo, the lands immediately to the east are being advanced for residential development. A new elementary school was recently constructed to the west of the subject lands to accommodate the growing population within Baden. This is located adjacent to the existing Waterloo Oxford Secondary School, which is shown on the map below:



As noted, the subject lands are presently used for cash crops while the existing barn accommodates several horses. With the steady progression of residential development to the east, south and west of the subject lands, our client has been constrained in expanding any agricultural use given the Minimum Distance Separation (MDS) criteria. The small equestrian operation is primarily contained to the owner's horses. There is a large woodlot along the north portion of the property and a hydro-electric transmission line.

As noted, the southern portion of the lands are within the Baden Township Urban Area, which was undertaken through Regional Official Plan Amendment No. 6. The Township of Wilmot Official Plan has not yet been updated to reflect these Regional Official Plan amendments but this is expected to occur over the coming months. The northern portion of the lands are identified as Prime Agricultural in the Region of Waterloo Official Plan and "Countryside" in the Township of Wilmot Official Plan. The subject lands are currently zoned Agricultural (Z1) in the Township of Wilmot Zoning By-law although it is expected that the zoning for the southern parcel within the Baden Settlement Area will be updated along with the local Official Plan. The lands to the north of the subject lands are currently occupied

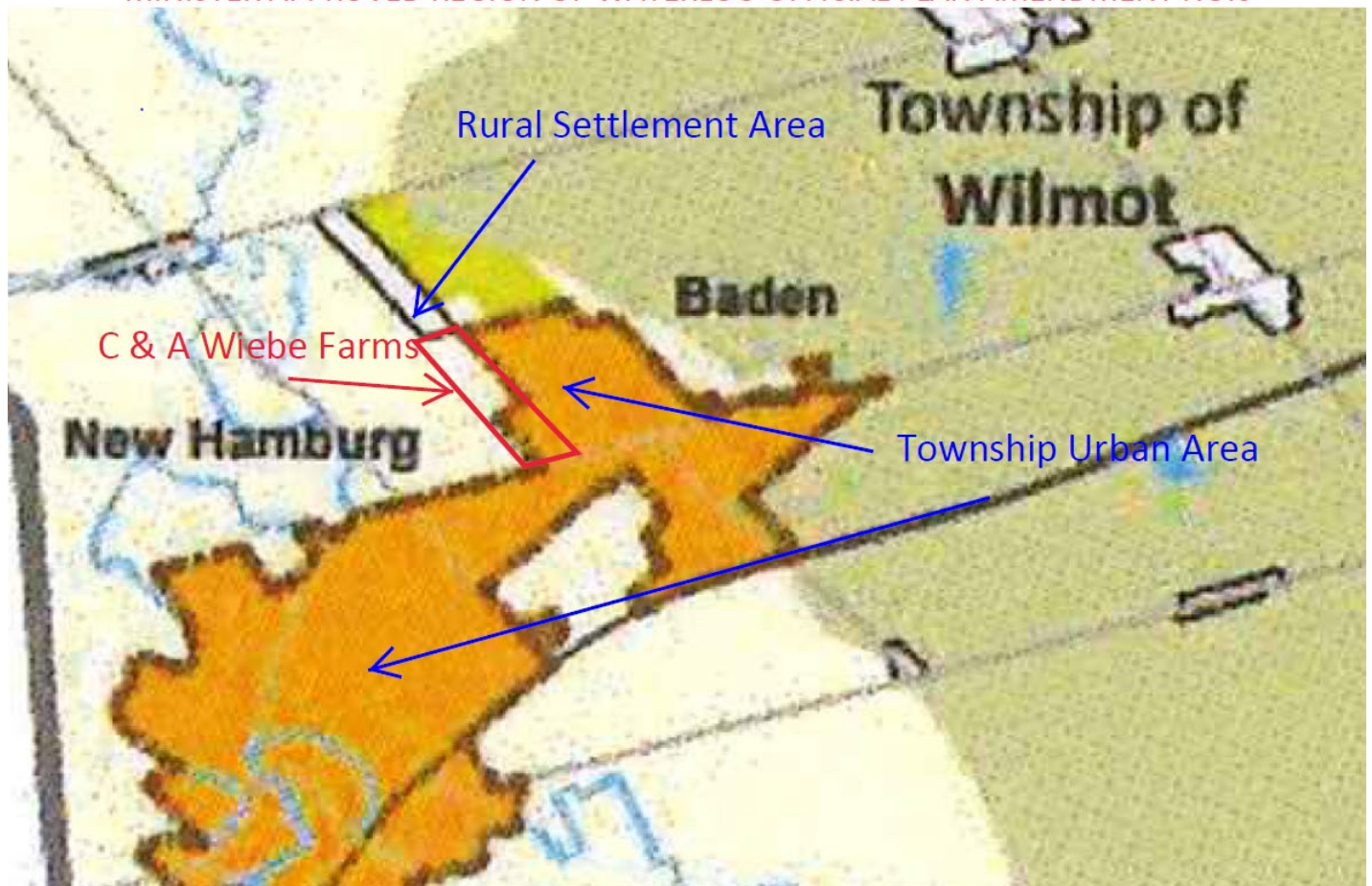
by a rural settlement area (Foxboro Green) which is designated as Rural Settlement Area in the Region of Waterloo Official Plan and Township of Wilmot Official Plan.

The continued agricultural viability of the northern portion of our client's lands is constrained due to a number of factors:

- Existing and planned residential development surrounding the property on three sides will limit agricultural operations due to the potential for noise and odour concerns;
- There will be no direct access to the northern portion for farm equipment and utility vehicles except through the residential lands to the south thereby limiting the viability of operating any type of agricultural operation;
- The remaining parcel is of limited size and due to proximity of planned residential development, cannot facilitate any NEW farm buildings.

Because of these factors, it is our opinion that including the northern portion of our client's lands into the Baden Settlement Area is appropriate. We request that minor rounding of the boundary of the Baden Township Urban Area, as identified on the air photo above and illustrated on the Region OP map below:

MINISTER APPROVED REGION OF WATERLOO OFFICIAL PLAN AMENDMENT NO.6



The proposal is a minor expansion or rounding out of the settlement area, which will facilitate the development of undersized and constrained agricultural land, which is adjacent to the Baden Settlement Area to the east and south.

While an Agricultural Impact Assessment has not been undertaken for the subject lands, it is not expected that the re-designation of the northerly 24.17 hectares will have an impact to the ability of sustaining long-term agricultural uses and operations on surrounding lands within the Township.

We have reviewed Policy 2.3 of the Planning Policy Statement and, in particular, Policy 2.3.4 regarding settlement area boundary expansion. The request addresses the criteria for settlement area boundary expansions for the following reasons:

- The subject lands are not identified as a Specialty Crop Area, based on Provincial Agricultural Mapping.
- The proposal complies with the Minimum Distance Separation.
- The majority of surrounding lands are urban residential and rural residential. The subject lands are buffered from surrounding agricultural operations, which limit the potential for trespassing, littering, and complaints related to noise and odor.
- The subject lands represent a logical location for urban development as they are adjacent to the Baden Settlement Area to the south and east and to a Rural Settlement Area to the north.
- An appropriate servicing strategy will be determined through future application in support of a development proposal however master servicing studies undertaken by the Region and Township have concluded that the subject lands can be readily serviced.
- Existing and planning subdivision applications to the east have taken into account future road and servicing extensions to the southern portion of the lands and the same accommodations can be made for the northern portion.

In our opinion, the minor rounding out to include the subject lands within the Baden Township Urban Area in the Region of Waterloo Official Plan is appropriate. This will facilitate the residential development of lands that are otherwise underutilized and not a viable agricultural property.

Thank you for the opportunity to submit this request. We appreciate your consideration and if you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

**MHBC**



Emily Elliott, BES, MCIP, RPP  
Associate

cc. *C & A Wiebe Farms Limited*