Waterloo Region Nature  
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January 7, 2022

Dawn Mittelholtz - Municipal Clerk

Township of Wilmot  
60 Snyder's Road West  
Baden, ON N3A 1A1

Subject: Request for Support of an MZO Application re 1265 & 1299 Waterloo Street

Waterloo Region Nature is a naturalist club for all parts of the [Region of Waterloo](https://www.google.ca/maps/place/Waterloo+Regional+Municipality,+ON) and we are a charity engaged in conservation activities. One of our goals is to promote public interest in nature, its ecosystems, and their preservation by supporting enactment of wise legislation. We represent some 300 members throughout the Region of Waterloo and are affiliated with some 30,000 members of Ontario Nature across the province through their Nature Network.

We have become seriously alarmed by the Ontario Government’s profligate use of Minister’s Zoning Orders to initiate land use projects that fly in the face of good environmental policies laws and regulations. Much of this MZO activity threatens the preservation of increasingly rare farmland, wetlands, and water resources and exacerbates the climate crisis that is of concern to every human being. The subject MZO application by Developer Cachet/Bousfield for rezoning of their land holding in Wilmot is thus of grave concern.

Several of our members attended (watched) the virtual Wilmot Council meeting on 4 January and have read the Wilmot staff report and the developer's supporting documents. The comments and concerns expressed by delegates to the meeting were appropriate and worthy of close attention by Council. We wish to emphasize the following points:

1. This proposed greenfield development will incur the loss of 43 hectares of valuable arable farmland, and likely precipitate other similar applications. We live in an area of prime farmland, a resource that is already limited and declining all too rapidly in Ontario. Despite Canada’s vast area, farmland is, to the surprise of many, quite limited. Food security has become a concern in recent years with climate change causing crop losses and soil degradation.
2. The proposed MZO would allow the developer to lock-in this greenfield subdivision before the Region and Wilmot have completed their land-use analysis and greenfield allocation, currently underway. There is no guarantee that the updated Region’s Municipal Comprehensive Review will include the subject lands as designated for greenfield growth, nor is the growth allocation for Wilmot/Baden/New Hamburg yet decided. The MZO will bypass and pre-empt these future decisions, thus ensuring that the developer’s land holding will realize its maximum investment potential value, without public benefit of appeal or environmental review processes.
3. This development will be entirely car dependent until such time as train and bus access are in place. There is no timeline in place for this to happen. There is no plan in place with WR or the Province, and no plan is offered for the financing, development, and implementation of the “Transit Hub”. This has severe implications for carbon emission reduction efforts committed by the Township. The Transit Hub is geared to commuting to Kitchener/Waterloo/Stratford/ Guelph, not to providing local sustainable transit between and within the settlement areas of Baden/New Hamburg. It is hard to imagine how Baden/New Hamburg will be able to provide the 1200 to 2000 jobs needed to make the longer commutes unnecessary.
4. The proposed MZO will commit Wilmot Township to this one developer, and to this one Master Plan, and the attendant infrastructure costs, both local and Regional, all without benefit of updated planning or alternative solutions, and without right of appeal. Many of the aspects of this proposed development require the agreement, cooperation, and financial support of Region and/or Province, or future entrepreneurial investment in the site’s amenities, none of which is yet planned, much less guaranteed.
5. To call the proposed site plan a “village” is a bad joke. It has all the attributes of a six story, car choked, concrete/masonry canyon, sitting in the middle of a field. It is adjacent to a thriving organic farm and a fertilizer plant full of hazardous materials. It must be noted that organic farms are highly sensitive to contamination due to the use of chemicals, salt, and non-organic seed on surrounding properties. All the green space is on the perimeter, almost as an afterthought, hopefully fenced off from the adjacent properties to prevent trespassing by the 2000+ residents and their dogs. The plan has more of the appearance of a barracks or prison camp with no green space or even a token tree in the core. Wilmot can do better than this.
6. There is no mention in the proposal of any sustainable energy features. Where are the solar water heaters, the PV arrays that can be placed on the south facing roof tops? Where are the green roofs on the commercial buildings? Where are the water gardens to trap run-off? Where are the permeable surfaces of parking lots? Where are the shade structures incorporated into the architecture? Not a single mention!
7. Lastly, the developer and the township staff agree that there is no urgency for this development, and therefore no reason for use of an MZO. The project is far from being “shovel ready”. We must conclude that the only reason that an MZO is being requested is the developer’s desire to lock-in the investment potential of their greenfield property in face of the possible exclusion of their land as a result of the on-going Municipal Comprehensive Review Processes, which may not go their way. We should be proud and highly supportive of Waterloo Region’s Planning which has been ahead of its time for decades.

**Mistakes made today will be locked in for 30 years without right of appeal**

Waterloo Region Nature urges Wilmot Council to refuse to support the developer’s MZO request.

Yours sincerely,

Levi Moore, Conservation Director.

CC: Councillors Gordyk, Hallman, Ferber, Fisher, Pfenning; Mayor Armstrong; MPP Michael Harris; [*50by30waterlooregion@gmail.com*](mailto:50by30waterlooregion@gmail.com)*.*