



- committed to achieving and supporting a long-term healthy environment in Wilmot and Wellesley Townships through education, action and collaboration.

<https://nvecoboosters.com>

January 18, 2022

Ms. Dawn Mittelholtz
Municipal Clerk
Township of Wilmot
60 Snyder's Rod West
Baden, ON N3A 1A1

Dear Ms. Mittelholtz,

Re: The application for an MZO to develop 1265 and 1299 Waterloo Street

The Nith Valley EcoBoosters is a not-for-profit, politically non-partisan volunteer group committed to achieving and supporting a long-term healthy environment in Wellesley and Wilmot Townships through education, action and collaboration. Since our inception in 2015 as a community based environmental group, we have been diligent about adhering to our mandate. We have held at least 2 community educational events every year that have focused on environmental issues. We have taken action to voice our concerns about the recent staff recommendations for the Region of Waterloo Official Plan update. We have collaborated with other organizations both local and further afield on actions and events. An example is the Kitchener Conestoga 100 Debates on the Environment that we co-hosted prior to the fall election. Members of our group have delegated to Wilmot Council – most recently in June 2021 to advocate for stronger climate goals.

The Nith Valley Ecoboosters group is serious about protecting the environment and we would like you to take our concerns about the ramifications of approving the MZO for a proposed development at 1265 and 1299 Waterloo Street seriously. These concerns are as follows:

Lack of adherence to the Township's planning policies

Wilmot Township's 2019 Official Plan "establishes the direction for development" in our community. The Township Council needs "to ensure that development proceeds in accordance with the objectives of this Plan". The Plan was created to ensure that "public services are available for the health, safety and convenience of residents of the Township". We are concerned that if this MZO is approved, the proposed development may not adhere to the policies in the Official Plan. We are particularly concerned that lack of proper oversight could result in negative effects on the environment because of a lack of an environmental assessment. There is no mention in the proposed development plan about the fertilizer plant that is adjacent to the south end of the property. Proper distances need to be maintained between residential properties and that type of business. In addition, evacuation routes need to be planned in case of a leak or some other disaster at the plant. These are important considerations for this development and should not be overlooked.

Reduced ability of the Region to protect our rural areas

Waterloo Region has a reputation for thoughtful planning that has protected farmland and environmentally sensitive landscapes. The Region is in the midst of updating its Official Plan. All the municipalities in Waterloo Region have agreed that we are in a climate emergency so the Official Plan update will certainly be taking that into consideration. If Wilmot Council approves the MZO, there will be no guarantee that the proposed development fits within the guidelines of the updated Region of Waterloo Official Plan. Furthermore, other developers may follow the MZO route to ensure their projects are approved leaving the entire Region powerless to continue protecting our rural areas resulting in reduced food production and increased susceptibility to the effects of climate change.

Lack of strategies to reduce greenhouse gas emissions

Both the township and the region have agreed to significant reductions in greenhouse gas emissions in the coming years. The proposed development will make it difficult to meet those commitments since it is entirely car dependent. Even though the plan for the development includes a transit hub, there are no guarantees that access to public transit will be available at any time in the near future since expansion of public transportation requires collaboration between municipal, regional and provincial governments. Development of public transit also requires a certain level of population to make investments worthwhile. It is questionable whether the proposed community would qualify. In addition, the proposed plan lacks any mention of sustainable energy features which would help with reducing greenhouse gas emissions. Some examples would be installation of rooftop solar panels on all buildings; EV charging capability built-in to all residential and commercial buildings; and geothermal heating systems, to name a few.

We know that you have heard from other groups and individuals who have similar plus additional concerns about the proposed development. We hope that these concerns have convinced you that it is imperative for the long-term health of this community's environment that you refuse to support the developer's request to approve his MZO application.

Yours sincerely,

Dorothy Wilson
Communication Team
Nith Valley EcoBoosters

CC: Mayor Armstrong; Councillors Fisher, Gerber, Gordijk, Hallman, Pfenning; MPP Mike Harris