

Chair Redman and Members of Regional Council

Aug.20,2024

Mayor Salonen and Members of Wilmot Council

RE: Wilmot Farmland Expropriation

Dear Chair, Mayor and Councilors:

I am submitting this letter to voice my extreme displeasure with the proposed expropriation and purchase of farmland in Wilmot Township. As a Registered Professional Planner, I can state that this “taking” contravenes almost every sound planning principle regarding the preservation of farmland and proper/orderly growth.

Almost 50 years ago, I began my planning career in the municipal sector including 4 years with the Region of Waterloo. At that time, we prepared the first ever Regional Official Plan (ROP) based on a policy approach to land use planning. Policies included the protection and preservation of prime farm lands and environmentally significant features together with strong urban boundaries as the focus of growth. This was the first Ontario ROP and it set the standard for all other Regions to follow. A very proud accomplishment for Waterloo Region.

These policies have been strengthened over the years and Waterloo Region remained on the leading edge of proper and orderly growth by limiting urban boundary expansions and intensifying along the new urban rail corridors. To now “leapfrog” industrial development almost in the middle of “nowhere” completely defies logic and proper planning.

Expropriations are typically undertaken for government or utility infrastructure projects. These are of course subject to the Environmental Assessment process which requires the consideration of alternatives including “do nothing” and this process includes extensive public engagement and involvement. This expropriation is being done “in camera” and without any public engagement whatsoever. Even the new MZO procedures recently released by the Province require public consultation prior to any MZO consideration.

This expropriation is not for an airport expansion, new transit station, new water or sewage plant but rather for “shovel ready industrial land”. This is not what the Expropriation Act intended – a future industrial park well removed from centers of population, servicing and lacking public transportation. These lands are not even contiguous to the current New Hamburg urban boundary and have no servicing infrastructure available: hence “leap frogging”.

Both Wilmot Township and the Region have significant employment lands available. The employment area along Highway 7 in New Hamburg is currently being serviced and will supply the

employment lands needs for many years to come. There is simply no justification to the proposed expropriation from a land needs perspective.

This expropriation and land taking does not comply with the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, The Regional Official Plan or the Township Official Plan. As a Registered Professional Planner, I can see absolutely no planning merits to this undertaking as it defies all current planning objectives and goals.

As a private planning consultant I have been involved in numerous Official Plan amendments and urban boundary expansion requests. Let me give you a hypothetical but realistic scenario to help illustrate just how inappropriate this expropriation initiative really is.

Lets assume that I have a client that has assembled 700 acres of farm land in Woolwich Twp along Highway 85 halfway between Elmira and St Jacobs. This client wishes to develop "shovel ready" employment lands and to do so would require a ROP amendment and a local OP amendment together with a ZBA and a draft plan of subdivision. These are prime farmlands and are outside the current urban boundaries and are not serviced. Identical to the Wilmot lands.

The first requirement would be a formal pre consultation meeting with municipal and regional planners. They would voice their opposition to this proposal as it is completely contrary to current planning policies but since we have the right to make an application, they would identify the studies and reports needed for a "complete application". These reports and studies would include a Transportation Impact Study, An Environmental Impact Study, an Agricultural Impact Study, detailed soils and ESA reports, Groundwater Recharge and Hydrogeological Studies, an Employment Land Needs Study, An Employment D-6 Sensitivity Study, A Public Consultation Strategy and all summarized in a Planning Justification Report providing the planning basis in support of this matter.

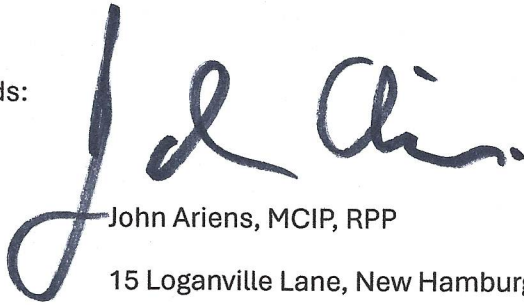
The above hypothetical application would undoubtedly be denied by both Regional and Township Councils. Yet it demonstrates what the private sector would need to do just to make the request. None of the above studies or reports or process were followed by the expropriation authority. We appear to have 2 sets of rules and procedures here—a very strict and rigorous process for the private sector and a "wide open doorway" for the public sector.

Jobs and economic growth are important however not to the detriment of existing communities and our precious prime farmlands. Just think what a new industrial park or facility on these lands will result in:

- No infrastructure and significant expense to extend servicing
- No rail or transit connections
- Not close to large population centers
- Highway improvements needed (significant increase in truck traffic alone)
- Negative Impact on existing communities (Baden and New Hamburg will be completely changed forever)
- Negative Impact on Natural Features and ground water quality

This "taking" is not in the PUBLIC INTEREST and I urge both Councils to abandon this initiative. Any future "shovel ready" employment lands should be contiguous to existing employment lands where infrastructure, transit, roads and workers are currently available.

Regards:

A handwritten signature in black ink, appearing to read "John Ariens". The signature is written in a cursive style with a large initial "J".

John Ariens, MCIP, RPP

15 Loganville Lane, New Hamburg, N3A 0G3

Cc Mike Harris, MPP

Tim Louis MP