

**Opposition & Concerns regarding File # RHOPA-26-001 / ZAC-26-004**  
**471 Moxley Road, Greenville**

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**Good morning Mayor and Members of Council,**

My name is Paul Agar, and I am a resident of Greenville.

I would like to strongly oppose the proposed rezoning and development at 471 Moxley Road based on the concerns below.

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**Core Concern**

This planning request seeks approval for a high-intensity commercial development with unspecified future uses in a rural area that depends entirely on a fragile and already stressed groundwater system. This is not simply a land-use change—it is a decision about whether the existing water supply in Greenville can sustain a meaningful and permanent increase in demand. Based on the available evidence, including documented well failures, constrained aquifer conditions, and the absence of comprehensive hydrogeological validation, there is no basis to conclude that it can. As a resident of Greenville since 2004 who relies on a private well, I have seen firsthand the limits of this aquifer system, and those limits are already being reached.

**Water Demand – Scale of Impact**

Using standard municipal planning assumptions (such as those applied by the Region of Peel), a development consisting of 10 office-type businesses (10 employees each) and 10 light industrial/workshop businesses (20 employees each) would be expected to generate a total daily water demand in the range of approximately **25,000 to 38,000 litres per day**. This estimate is based on typical usage rates of **50–75 litres** per employee per day for office uses and **100–150 litres** per employee per day for light industrial uses. While this volume may appear modest compared to large industrial users, it represents a continuous, fully consumptive groundwater demand in a rural setting, where water is drawn from a shared aquifer system. As a result, even at this scale, the cumulative impact can contribute to localized drawdown, well interference,

and increased stress on a fractured bedrock aquifer, particularly when combined with existing demand in the area.

This estimate does not include customers or visitors, so the real number is likely significantly higher. This is the equivalent of building 28 to 42 new homes for a family of four.

There is already clear, real-world evidence that the local groundwater system is under stress. In 2022–2023, multiple residential wells in the Greensville area - including homes in the Grand Vista neighbourhood - experienced failure, requiring costly re-drilling or deepening. Similar issues have been reported at nearby and adjacent properties to 471 Moxley Road, pointing not to isolated incidents but to a broader pattern of instability within the local aquifer. In a fractured bedrock system like this, such failures are widely recognized as indicators of constrained supply and sensitivity to additional draw.

This concern is reinforced by the municipality's own actions under the Ontario Ministry of Natural Resources and Forestry Low Water Response Program. This framework escalates from Level I (awareness) to Level III (critical shortages), and in 2020 the City of Hamilton issued conservation advisories that ultimately escalated to a mandatory ban on non-essential water use. The implication is straightforward: the City has already acknowledged system-wide water stress. Approving additional groundwater demand in this context introduces a clear and avoidable risk of worsening well interference and supply instability for existing residents.

The reality of the Greensville groundwater system is that it is inherently constrained and vulnerable. The aquifer is largely dependent on rainfall and snowmelt for recharge, has limited storage capacity, and replenishes slowly over time. It is also highly sensitive to drought conditions, meaning that even short periods of reduced precipitation can have measurable impacts on water availability. This is not a deep, resilient aquifer with strong buffering capacity—it is a shallow, locally influenced system that responds quickly to stress.

Studies by the City of Hamilton and local watershed authorities have confirmed these limitations. Evidence shows that wells in the area have run dry when precipitation falls below approximately 75% of normal levels, including the public well in Greensville that serves approximately 100 residences. Along with these challenges the local soil conditions further restrict the ability of water to infiltrate and recharge the aquifer. Together, these factors demonstrate that this is not a robust or self-sustaining water system - it is a constrained one, already operating close to its limits under existing conditions.

Provincial well records point to a consistent and concerning pattern in the local area: low-yield wells, increasing drilling depths over time, and a growing number of replacement or re-drilled wells. This trend is characteristic of a fractured bedrock aquifer, where groundwater is not stored in a single, continuous reservoir but instead moves through small, disconnected fractures in the rock. As a result, water availability is inherently limited and unpredictable, and wells often compete with one another for the same constrained supply.

In practical terms, this means there is no large, reliable underground water source—only a series of smaller, fragile pockets that can be easily depleted. Adding new demand into this type of system increases the likelihood of well interference, reduced water availability for existing users, broader system decline and significant increase in costs to re-drill or relocate private wells. In an already stressed aquifer, even modest increases in withdrawal can have disproportionate and lasting impacts on neighbouring wells and the overall sustainability of the groundwater supply.

Despite the clear evidence of a constrained and sensitive groundwater system, there is no publicly available comprehensive hydrogeological study demonstrating that this development can be supported without risk. Specifically, there is no analysis confirming a sustainable long-term water supply, no assurance that surrounding private wells will remain unaffected, and no evaluation of how the system would perform under drought conditions. In a rural, well-dependent community, these are not secondary considerations - they are essential safeguards. Proceeding without this level of due

diligence represents a significant and unacceptable gap in the evidence required to support approval.

The application also lacks sufficient hydrogeological information to assess impacts on the local aquifer and groundwater movement. In a rural area dependent on private wells, this is a critical omission. There is no clear analysis of groundwater flow direction—particularly whether flows extend south of the site—nor any assessment of how increased water demand, reduced recharge, or potential contaminants from a large paved commercial site may affect surrounding properties. Without this information, Council cannot determine whether the proposal is consistent with the Provincial Policy Statement's requirement to protect water resources, and approval would be premature.

This proposal places existing residents at real and measurable risk for their water security. Additional groundwater demand in an already constrained system can lead to reduced water availability, well interference, and, in some cases, complete well failure. For homeowners, the consequences are significant: the cost of drilling deeper or replacing a well can be substantial, and ongoing uncertainty around water supply can negatively affect property values and long-term livability. These are not abstract concerns - they reflect impacts that residents in the area have already begun to experience for a number of years.

Compounding this risk is the absence of any viable municipal backup. Residents in Greensville, apart from approximately 100 residences on a community well, rely entirely on private wells and based on direct communications with the City of Hamilton building department, extending municipal water servicing to the area has been deemed cost-prohibitive. In practical terms, this means that if groundwater supply is compromised, there is no alternative source of water. The burden falls entirely on individual homeowners, making the protection of the existing aquifer not just important, but essential.

A review of well records from the Water Well Information System for the Greensville / Moxley Road area **indicates a consistent pattern of constrained groundwater**

**supply** typical of fractured bedrock aquifers. Numerous wells in the surrounding area report low yields frequently below 2 gallons per minute - which falls well short of commonly accepted standards for reliable domestic use. In addition, records show increasing well depths over time and multiple instances of wells being deepened, replaced, or abandoned.

These patterns are not isolated anomalies but occur within a relatively concentrated geographic area, indicating that groundwater availability is both limited and inconsistent. The recurrence of such conditions across multiple properties supports the conclusion that this is not a site-specific issue, but rather a broader hydrogeological constraint affecting the local groundwater system.

This pattern of low yield, repeated drilling, and escalating well depths is widely recognized as an indicator of aquifer stress and declining reliability. The presence of multiple wells on single properties, along with documented alterations such as deepening or replacement, strongly suggests that existing wells have been unable to sustain adequate supply over time. In the absence of a comprehensive hydrogeological study demonstrating long-term aquifer capacity and recharge characteristics, these documented conditions raise serious concerns about the cumulative impact of additional groundwater demand. Approving further development in such a context risks exacerbating drawdown, increasing well interference, and compromising the already limited water supply available to existing residents.

Further, the presence of multiple replacement wells within a localized area, including sequences where earlier wells have been abandoned and superseded by deeper installations, strongly suggests that initial water supplies have proven unsustainable. This pattern is widely understood in hydrogeological practice as a response to inadequate yield or declining performance over time. The progressive increase in well depths, coupled with repeated drilling efforts on individual properties, reflects attempts to access diminishing or difficult-to-reach water sources, rather than the existence of a stable and productive aquifer.

Taken together, these indicators are consistent with a constrained fractured bedrock aquifer, where groundwater is not stored in a continuous, high-capacity formation but

instead occurs within discrete and discontinuous fractures. Such systems are inherently sensitive to increased demand and are prone to localized drawdown and well interference. In the absence of a comprehensive hydrogeological assessment demonstrating sustainable yield and recharge capacity, the existing record provides clear and credible evidence that groundwater resources in this area are already under stress. Introducing additional demand through new development would therefore pose a measurable risk to both existing and future water supply reliability.

**In closing - Members of Council,**

You have already provided preliminary support for this application without clear, substantiated evidence on the most critical issue before you: water.

There has been no demonstrated confirmation that the existing groundwater supply can sustain this development. There is no reliable estimate of the expected water usage from the proposed businesses—businesses which, notably, have not yet even been identified. There has been no comprehensive, documented assessment of the current condition and performance of private wells in the surrounding community.

Approving a development of this scale without that information is not simply incomplete - it is premature, and it introduces real, measurable risk to an already constrained aquifer system relied upon by existing residents.

Decisions like this set a precedent. When Council moves forward in the absence of fundamental evidence, it undermines confidence in the planning process and in the responsibility to safeguard essential resources.

In planning, especially where a resource as fundamental as water is concerned, the standard must be clear: capacity is not assumed - it is demonstrated.

In this case, that demonstration has not been made. This is not just about development. It is about protecting a limited and essential resource for the residents who already depend on it and are already experiencing constraints.

For that reason, I respectfully submit that this application should not proceed.

**Thank you for your time.**

**Paul Agar**