

January 2, 2023

The Honourable Minister Steve Clark  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto, Ontario M5G 2E5

Attention: Gabriel Kim (Municipal Services Office - Western Ontario)

**RE: 1056 Swan Street (Township of North Dumfries - "Ballantyne Swan Street Lands")  
ERO No.: 019-5952 (Ministry Reference No. 30-OP-222206)  
Comments on Waterloo Region Official Plan Amendment 6**

Malone Given Parsons Ltd. ("MGP") are planning consultants and write this letter on behalf of Terry Ballantyne (1054455 Ontario Limited), the long standing owner of lands identified for future residential development in the Township of North Dumfries (the Township), one of the lower-tier municipalities in the Region of Waterloo (the "Region"), in response to Regional Official Plan Amendment 6 ("ROPA 6").

This submission continues upon our prior submissions to the Region regarding additional Community Area lands needed to accommodate mandated provincial growth including participation and comments in the Region of Waterloo open houses and public meetings relating to the Region's Municipal Comprehensive Review ("MCR").

As noted in our prior submissions during the Region's MCR process, based on our Land Needs Assessment ("LNA") there is a significant requirement for new Community Area land to accommodate forecasted growth in the Region to 2051. We have determined that at the minimum intensification target of 50%, the Region would require at least 944 hectares of additional Community Area lands beyond the existing supply to accommodate forecasted growth to 2051.

With regard to the Region's consideration of growth options, it is our opinion that the inclusion of the proposed expansion areas in southwest Ayr, which captures all 41 ha of the Ballantyne Swan Street Lands, are appropriate locations for a settlement expansion as they can achieve the Region's criteria for settlement area boundary expansion and are consistent with the Provincial Policy Statement, 2020 ("PPS") and conform to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan"). The recommended expansion areas and associated required modifications to ROPA 6 are provided in **Appendix 3** and included in this letter as Figure 8 in Section 7.

### 1. Ballantyne Swan Street Lands – 1056 Swan Street, Ayr, Township of North Dumfries

The Ballantyne Swan Street Lands are approximately 41 hectares in size and are municipally addressed as 1056 Swan Street, located at the southerly edge of the community of Ayr in the Township of North Dumfries. They are immediately adjacent to the Township Urban Area and are wholly contained within the existing Countryside Line.



Figure 1: Site Location

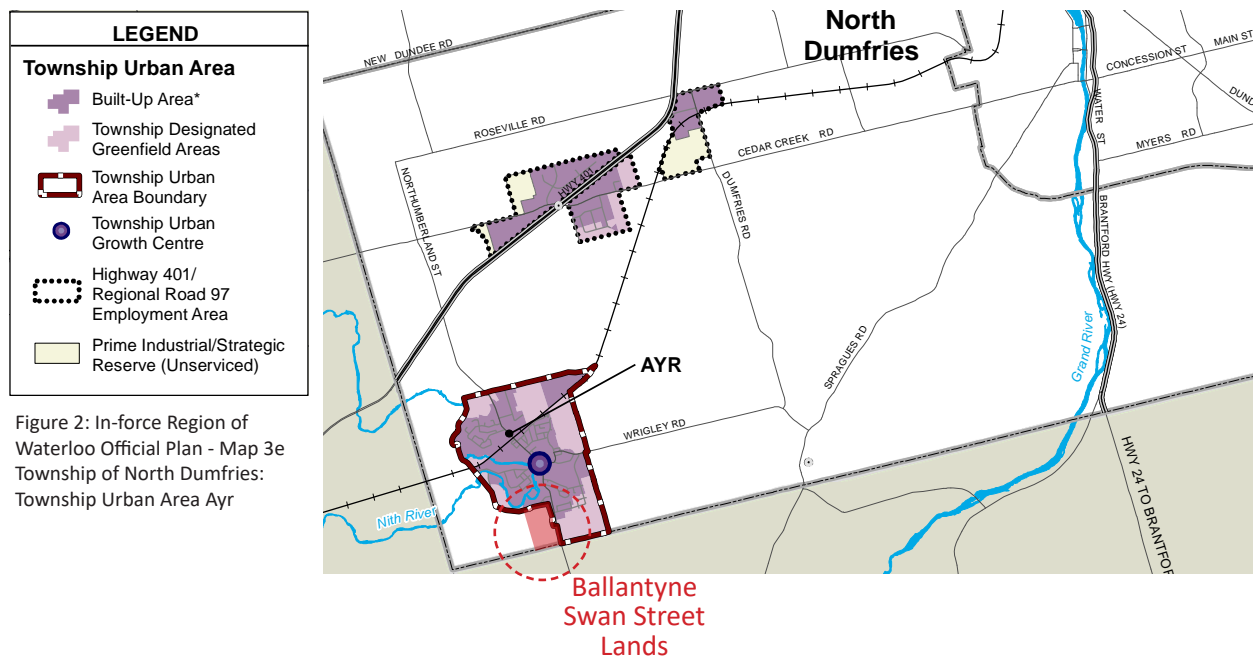


Figure 2: In-force Region of Waterloo Official Plan - Map 3e Township of North Dumfries: Township Urban Area Ayr

## 2. Submission to the Region of Waterloo (November 17, 2020)

Throughout the Region's MCR process, representations were made advocating for the inclusion of the Ballantyne Swan Street Lands within an expanded Township Urban Area in the Township of North Dumfries, as outlined in the attached November 17, 2020 submission by IBI Group (see **Appendix 5**).

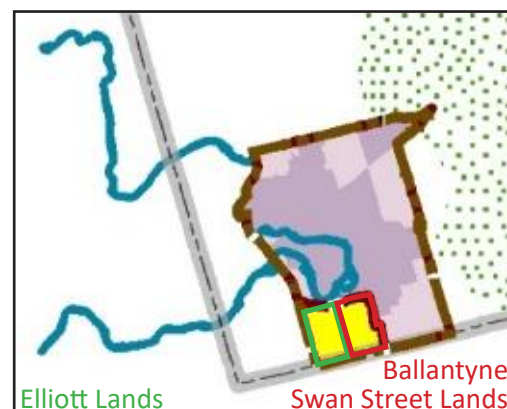
The outcome of ROPA 6 was that only a portion of the lands (19 hectares of 41 total) were recommended to be included as an expansion of the Township Urban Area for additional Community Area land to 2051.

The Region also established Policy 2.E.2.4, which gives priority consideration to the Ballantyne Swan Street Lands for any future expansion required in North Dumfries. This is discussed further in Section 4.

## 3. Candidate Urban Expansion Areas as Identified by the Region of Waterloo (Ask-a-Planner Webinar, June 2021)

In its assessment of suitable lands on which growth needs could be accommodated, the Region of Waterloo identified the entirety of the Ballantyne Swan Street Lands as well as the adjacent Elliott Lands as candidate areas for expansion if it would be determined that additional lands were needed to accommodate forecasted growth to 2051.

MGP's LNA, conducted in accordance with Provincial requirements, has identified a land need of 944 hectares beyond the existing supply for the Region to accommodate growth to 2051.



## Candidate Urban Expansion Areas

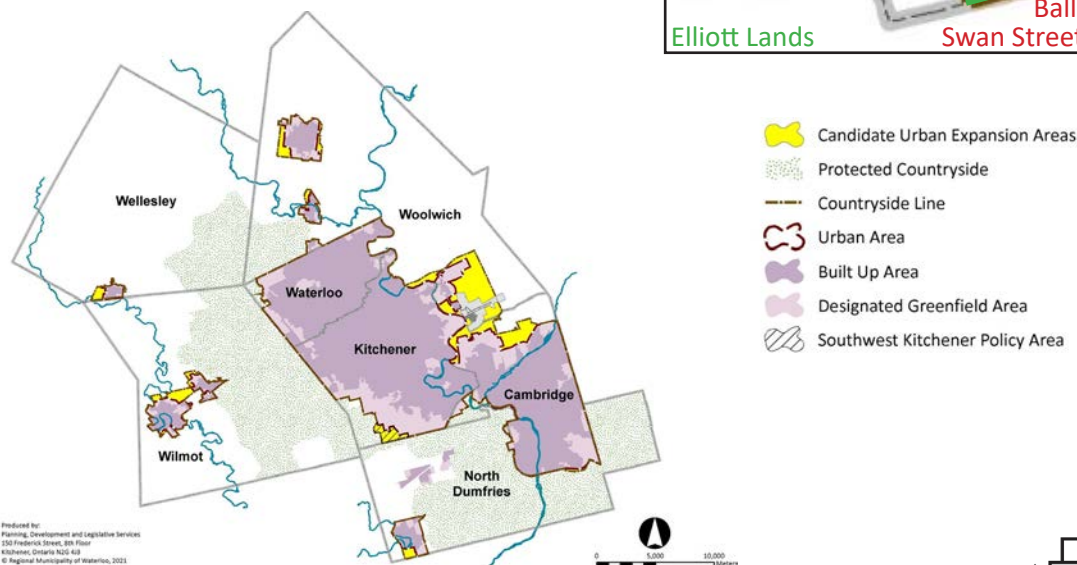


Figure 3: Candidate Urban Expansion Areas - June, 2021 RMOW Webinar



#### 4. North Dumfries Special Council Meeting (June 6, 2022)

On June 6, 2022, the Township of North Dumfries convened a Special Council Meeting to consider the then DRAFT Lands Needs Assessment prepared on behalf of the Region of Waterloo by its consultants Dillon/Watson.

The June 6th staff report (PD Report No. 22-2022, see **Appendix 6**) included the following commentary in support of including the Ballantyne Swan Street Lands for development (S. 3.1.1., p. 12):

“There are limited parcels of land available for the expansion of greenfield development within Ayr that would be situated within the boundaries of the Countryside Line. Staff are recommending that the property identified as Parcel B-1 as conceptually illustrated on Schedule 3 (Attachment 2 to this Report) be established as the preferred landholding. This parcel is approximately 41ha in size.

This parcel represents the logical extension of development along the Swan Street corridor. It leverages the sunk infrastructure investments already completed related to the installation of the 300mm watermain constructed on Swan Street, and, the Sanitary Pumping Station constructed and commissioned at the intersection of Leslie Davis Street / Swan Street.

Swan Street represents a logical corridor for transit if and when that service is provided to the Community of Ayr.”

The Council of the Township of North Dumfries passed a motion which, among other matters, included the following decision:

“That as part of the new Community Area Land Expansion under Option 2 assigned to North Dumfries, that the property identified as 1056 Swan Street as conceptually identified as Parcel B-1 on Schedule 3 attached be included in the expanded Ayr Urban Area Boundary;”

- CARRIED

Southwest Quadrant – Community of Ayr

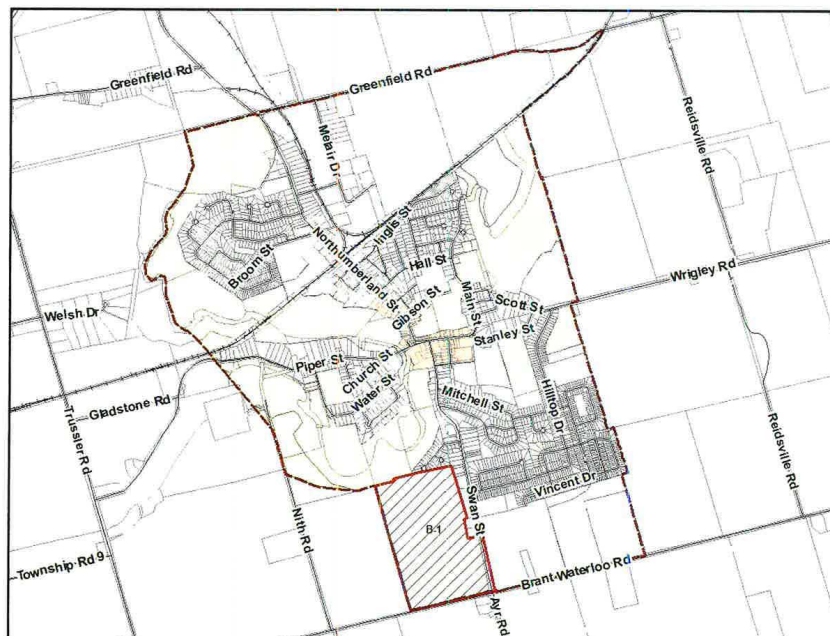


Figure 4: Township of North Dumfries Council Report PD No. 22-2022 (Community Expansion Area B-1, Ballantyne Swan Street Lands)

MGP's LNA (**Appendix 2**), completed in accordance with provincial requirements, has confirmed that 944 hectares of additional Community Area land above the currently supply is required as part of the current MCR process for the Region to accommodate growth to 2051.

WalterFedy's servicing memo (**Appendix 1**) has confirmed that there is sufficient capacity in the Ayr Wastewater Treatment Plant to accommodate the full build out of the Ballantyne Swan Street Lands.

In response to the preceding resolution by Township Council, ROPA 6 includes the following policy (Policy 2.E.2.4) speaking to the prioritization of including the remaining portion of the Ballantyne Swan Street Lands as part of the next ROP MCR process should a land need be justified.

- 2.E.2.4      As part of the next municipal comprehensive review of this Plan, the Region, in collaboration with the Township of North Dumfries, will give priority consideration to expanding the boundary of the Ayr Township Urban Area to include the lands shown on Figure 17, subject to the following:
- (a)      the need for the urban boundary expansion in the Township of North Dumfries has been justified in accordance with Policy 2.C.3.1;
  - (b)      the lands added to the Ayr Township Urban Area satisfy the applicable requirements of Policy 2.C.3.2; and
  - (c)      the Ayr Township Urban Area has sufficient reserve capacity in the municipal water and wastewater system to service the lands.

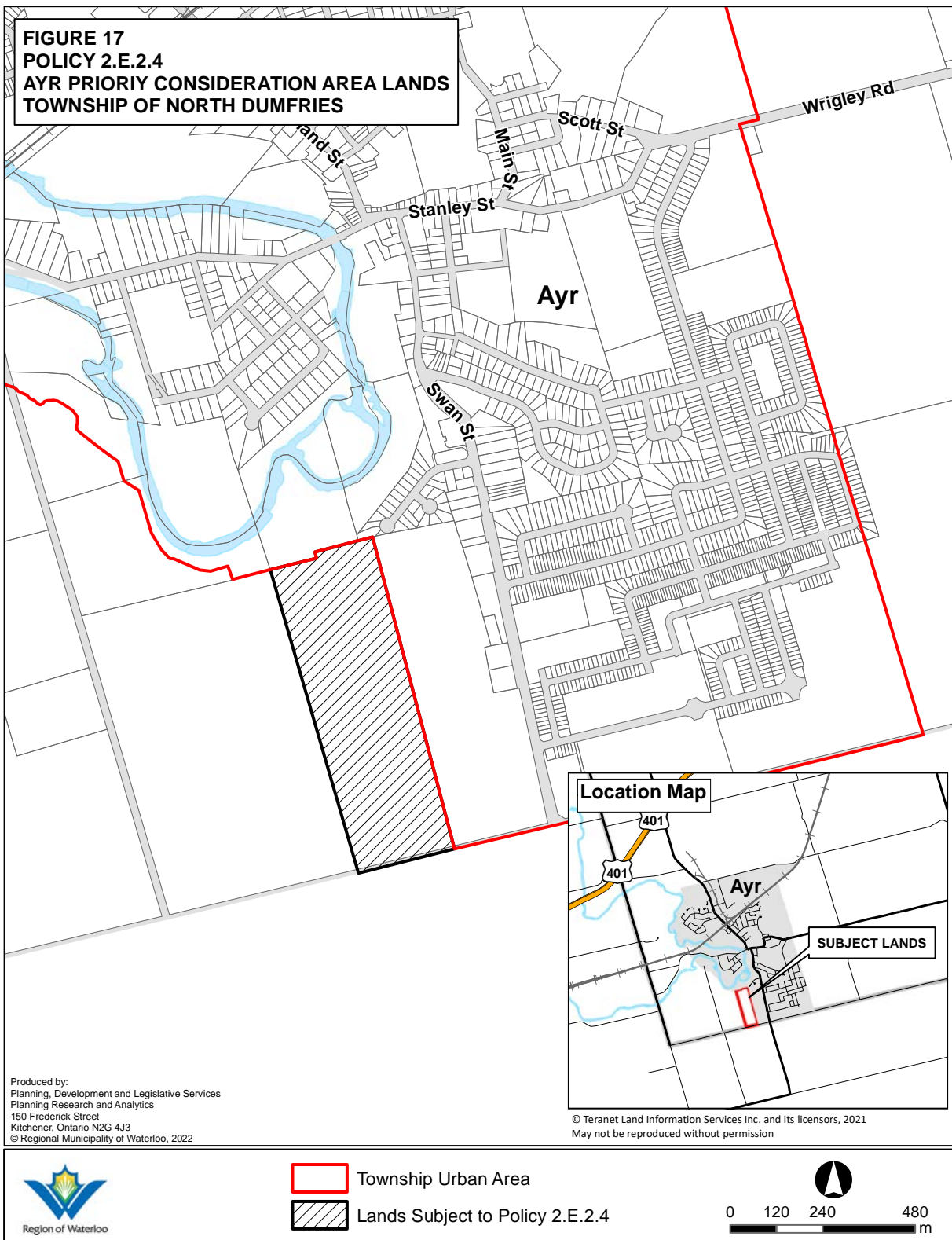


Figure 5: ROPA 6 Figure 17 - Prioritization of the Ballantyne Swan Street Lands for future inclusion in the Township Urban Area.

## 5. Provincial Target of 1.5 Million New Homes by 2031

Through a Bulletin (019-6171) posted to the ERO on October 25, 2022, the province identified specific housing construction targets for 29 municipalities across Ontario, including within the Region of Waterloo, targets for the cities of Cambridge, Kitchener and Waterloo. Collectively, these housing targets for 29 municipalities across Ontario represent 1,299,000 of the 1,500,000 new homes required by 2031.

Based on the above allocation, the province has recognized the need to build over 270,000 new homes in Ontario's smaller municipalities by 2031.

North Dumfries and the Township Urban Area of Ayr is well positioned to deliver a portion of the 270,000 new homes identified to be built across Ontario's smaller municipalities and to help achieve the much needed 1,500,000 new homes across Ontario by 2031.

In the context of the Region's current review of the ROP, the landowner and the Township of North Dumfries have repeatedly requested that the Ballantyne Swan Street Lands be considered as a candidate site for expansion of the Urban Area.

Our LNA analysis, undertaken in compliance with provincial requirements, concludes that the existing Urban Area will need to be expanded to accommodate the Region's projected population growth to the year 2051. The Ballantyne Swan Street Lands would be an ideal location for an expansion of the Urban Area to accommodate additional residential development, which would achieve numerous provincial and municipal planning policy objectives, as further explained in this letter.

The provincial requirement is for market-based housing to be made available. Waterloo Region has a younger demographic, which is seeking ground-oriented housing. This includes single-family homes, but notably also includes street townhomes, back-to-back, and stacked townhomes, building typologies which are often identified as "missing middle" housing forms.

Municipality	Housing Target
City of Toronto	285,000
City of Ottawa	151,000
City of Mississauga	120,000
City of Brampton	113,000
City of Hamilton	47,000
City of London	47,000
City of Markham	44,000
City of Vaughan	42,000
City of Kitchener	35,000
Town of Oakville	33,000
City of Windsor	13,000
City of Richmond Hill	27,000
City of Burlington	29,000
City of Oshawa	23,000
City of Barrie	23,000
City of Guelph	18,000
City of Cambridge	19,000
Town of Milton	21,000
Town of Whitby	18,000
City of St. Catharines	11,000
Town of Ajax	17,000
City of Waterloo	16,000
City of Kingston	8,000
City of Brantford	10,000
Clarington	13,000
City of Pickering	13,000
City of Niagara Falls	8,000
Town of Newmarket	12,000
Town of Caledon	13,000
<b>Totals</b>	<b>1,229,000</b>

Figure 6: ERO #019-6171 - 2031 Housing Targets

### MOST LIKELY TO BUY

	Total	Δ	18-34	Δ	35-54	Δ	55+	Δ
Detached home	63%	+3	56%	-1	66%	+6	71%	+6
Town/rowhouse	14%	-1	16%	+1	13%	-2	11%	-
Semi-detached	9%	-	11%	-	9%	-	4%	-1
High-rise condo (6+ stories)	8%	-2	11%	-2	7%	-3	5%	-4
Low-rise condo (≤5 stories)	6%	-	6%	+2	5%	-1	10%	-

26 - © Ipsos  
B5. What type of home are you most likely to buy?  
Base: Likely buyers (n=1186); 18-34 years (n=401); 35-54 years (n=445); 55+ years (n=340).



Figure 7: Ontario Real Estate Association - 2021 Ontario Home Buyer and Seller Profile

## 6. Proposed Conceptual Plan

The Proposed Concept Plan demonstrates that the Ballantyne Swan Street Lands will be a master planned, 15-minute community and represents the well-planned completion of the surrounding built and approved and to-be-built neighbourhoods and the logical rounding out or completion of south Ayr.

The Ballantyne Swan Street Lands are able to contribute approximately 500 new homes toward meeting the Region of Waterloo responsibility for new home supply and towards meeting the provincial target of building 1.5 million homes by 2031. A copy of the Proposed Concept Plan is shown below and has been included in this submission as **Appendix 7**.

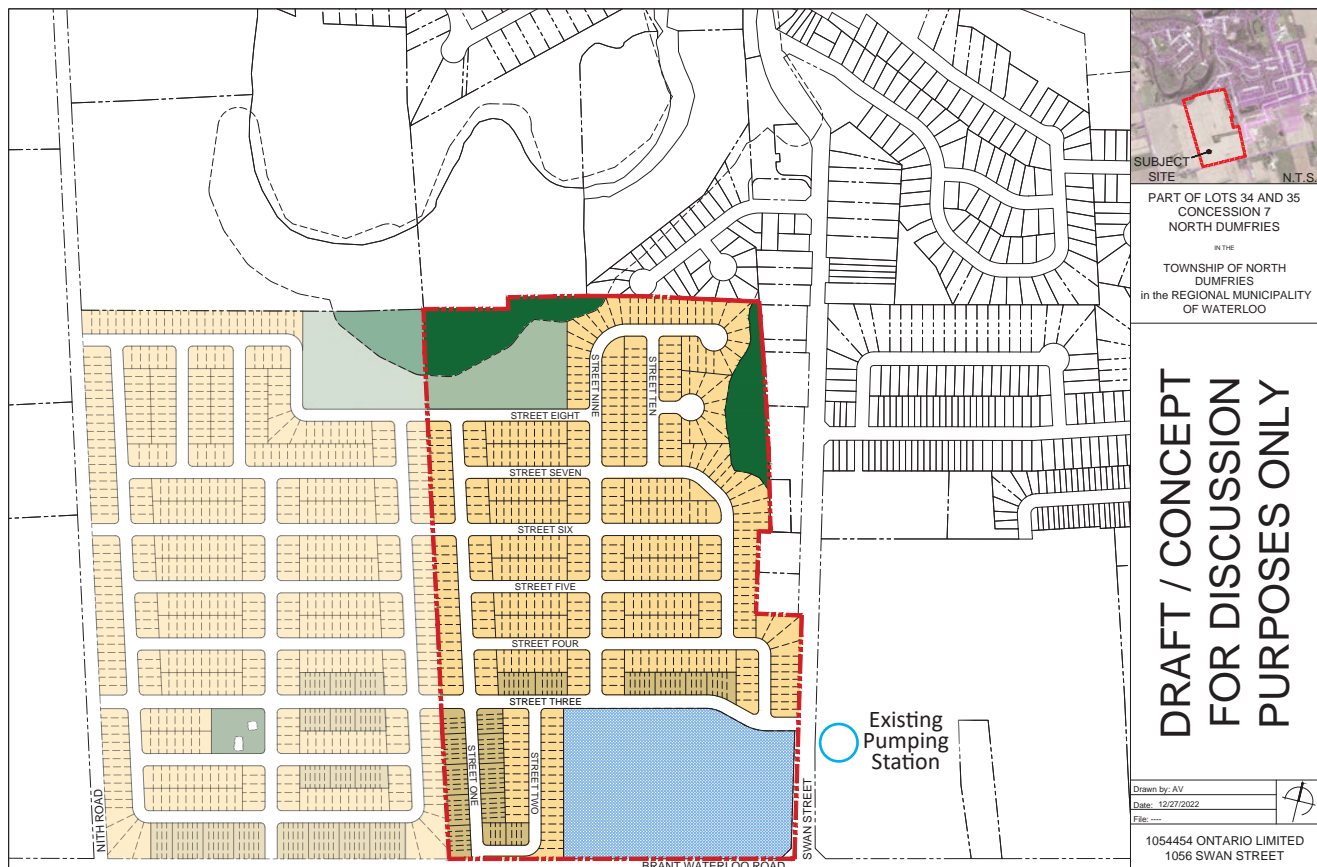


Figure 8: Proposed Conceptual Plan

### 6.1 Timing

New home construction could be commenced in 2025 / 2026 or before and very much contribute to meeting the identified 2031 provincial housing need.

Storm outlet and sanitary servicing stubs presently terminate within the lands. If planning approvals were achieved in 2023/2024, grading and internal servicing could be achieved in 2024/2025 and home construction commence immediately thereafter.



## **7. Summary of MGP Balanced Growth Scenario for Waterloo Region**

As part of the MCR, the Region is required to assess the need for additional land to accommodate growth to the 2051 planning horizon of the Growth Plan. The Provincial Land Needs Assessment Methodology for the Greater Golden Horseshoe (2020) (“LNA Methodology”) is to be used in conducting this assessment.

Attached as **Appendix 2** to this letter is a summary of MGP’s LNA undertaken for Waterloo Region that follows the LNA Methodology. Based on this assessment, there is a significant requirement for new Community Area within the Region to accommodate growth forecasted in the Region to 2051. We have determined that at the minimum target of 50% intensification, the Region would require at least 944 hectares of additional Community Area lands beyond the existing supply to meet the growth forecast to 2051.

It is our opinion that the Region should have undertaken an additional housing mix scenario to accommodate growth. The scenario that was considered by Region of Waterloo staff fails to provide an option with medium density housing as one of the prominent forms of housing in the growth mix to 2051.

In consultation with the Region during the EngageWR process (at the April 25, 2022 draft LNA overview session) we requested that additional scenarios be provided which emphasize medium density forms of housing (part of the “missing middle”) as a primary housing form in the future. We provided our scenario to the Region on May 27, 2022 and met with the Regional staff to present our detailed greenfield analysis and land needs assessment on June 3 and 10, 2022. Following the early June meetings we made representation at the June 29, 2022 Planning and Works committee meeting, at the July 27, 2022 statutory public meeting on the proposed Regional Official Plan Amendment and Land Needs Assessment and then at the August 11, 2022 Planning and Works Committee.

In addition, there are key policy considerations that we believe should have been addressed in the Region’s work prior to finalizing the Region’s LNA.

A balanced growth scenario that is medium density focused should have been considered by staff and Council as part of the work for the Region’s LNA. This scenario would, in our opinion:

- Meet or exceed the targets and fully conform to the Growth Plan, including the minimum greenfield and intensification targets;
- Primarily plan to house new residents in medium density forms of housing, which aids in meeting the market desire for grade-related, family-oriented housing, while also realizing a significant move away from the historically high proportion of low-density units and maintaining a shift to more apartments in the Region;
- Encourage growth in the Region for new families and retirees in more affordable housing they will prefer;
- Support high density growth and intensification by directing the vast majority of population growth into existing settlement areas and Strategic Growth Areas along higher-order transit routes, optimizing these areas for transit use and leveraging the significant investment in transit infrastructure;
- Maintain more than 74% of the Region for agriculture, rural and natural uses, and achieve a balance of priorities including the protection of agricultural and rural lands while providing sufficient housing supply and supporting economic growth in the Region;
- Accommodate a 50% population increase with only a 3% increase in settlement areas through smart growth neighbourhoods with higher densities and a greater mix of residential housing types and other uses that meet market demand. The total area used for urban uses will increase by only 1% (from 25 to 26%) in the Region.

Medium density housing can achieve both intensification in Strategic Growth Areas and a variety of housing in new communities. Based on the current market information, it is this type of housing that provides opportunities for improved housing affordability, increased density, complete communities, and desirable housing mix and forms for residents. This is especially true for young families and retirees who want 2-3 bedrooms in their current neighbourhoods without moving into an apartment.

More affordable housing that is attractive to residents and provides primarily grade-related units is essential to the quality of life in the Region and its continued ability to attract new employers and businesses who wish to house their employees. The primary means of ensuring long-term affordable housing in the Region is to provide an abundant supply of all housing types to meet market-based demand.

As noted in the Region's LNA prepared by Dillon/Watson, the demand analysis was not done on a unit-type basis, and instead blends the densities of multiple unit types. This does not comply with the Provincial LNA Methodology, which requires the need for each housing structure type to be assessed separately. In addition, our review of the greenfield supply analysis prepared by the Region has identified significant errors that result in the Region assuming there are 584ha of vacant Community Area land that did not exist as of 2021. This overestimation of supply will lead to a significant shortage of land in the Region unless corrected by ensuring a similar amount of land is added to the settlement area to meet growth needs to 2051.

In a medium density focused scenario, the overall housing mix is more realistic from a market-based forecast. We have determined that using the 50% intensification scenario, the Region would require a minimum of 944 hectares of additional Community Area land beyond the existing supply to accommodate growth. In this scenario, very few apartments are required in new settlement expansion areas.

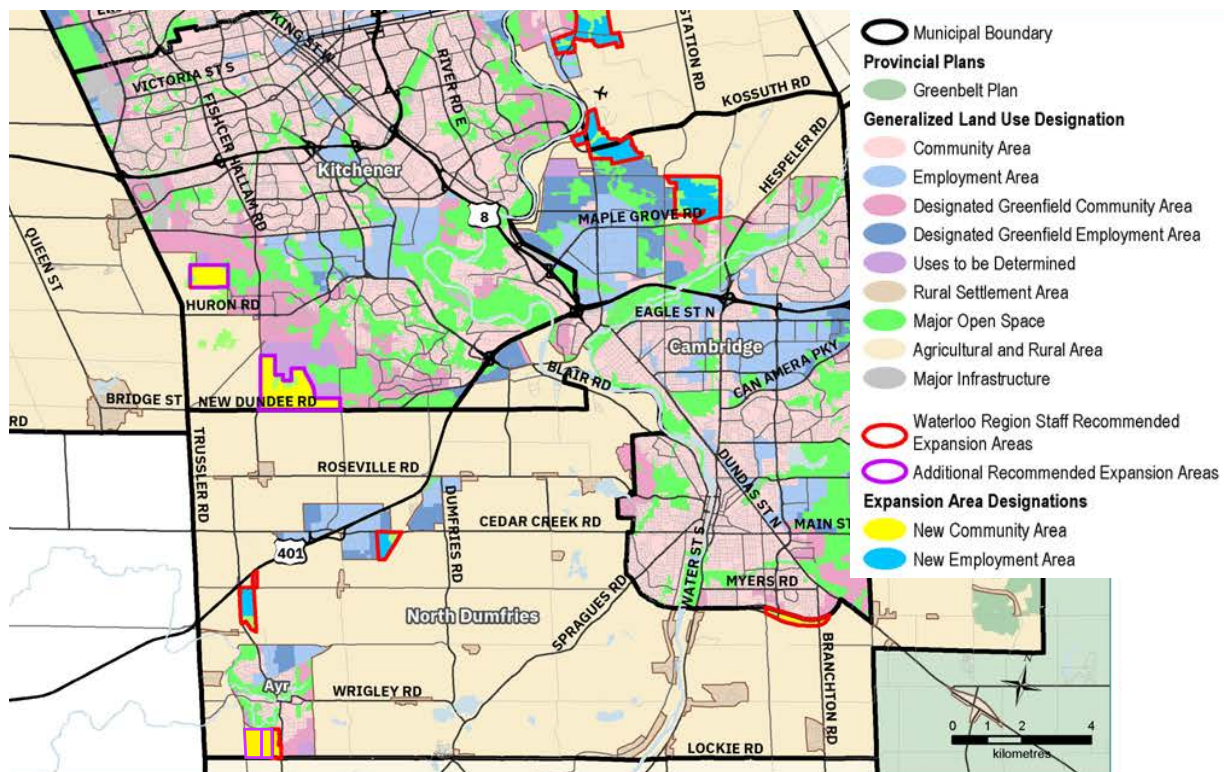


Figure 9: MGP Land Needs Assessment Mapping - Southwest Ayr, Township Urban Area Expansion

## **8. Additional Considerations**

### **8.1 Optimizing Existing Built Infrastructure**

As detailed in the Preliminary Servicing Overview prepared by WalterFedy (see **Appendix 1**), the Ballantyne Swan Street Lands have sanitary and storm services presently terminating adjacent the site, which represents the ultimate opportunity to make efficient use of existing infrastructure investments and an ability to quickly bring new missing middle homes to market, and therefore contribute to the 2031 provincial housing targets.

### **8.2 Servicing Overview**

Consulting engineering firm WalterFedy prepared a Preliminary Servicing Overview (see **Appendix 1**), which provides a comprehensive overview of the serviceability of the Ballantyne Swan Street Lands and concludes as follows:

- The Region has sufficient water and wastewater servicing capacity available in North Dumfries to accommodate development of the Ballantyne Swan Street Lands
- The lands are within the servicing limits of the existing sanitary pumping station
- The lands are within the service limit of the existing 300mm diameter watermain presently terminating immediately adjacent at the intersection of Swan Street and Leslie Davis Drive
- The stormwater management strategy for the Ballantyne Swan Street Lands is feasible and in accordance with guiding design standards

### **8.3 Urban-Adjacent Lands Have the Greatest Potential for Urbanization**

The location and qualities of existing urbanized lands should be considerations in the discussion about where to allocate new growth within a community. Modern greenfield planning has typically involved the use of comprehensive and master planning processes to inform development. A comprehensive planning process is an opportunity to undertake the most holistic approach to large-scale community development that we have available to us. Developing new communities under the framework of a comprehensive plan, when adjacent other recently developed lands (perhaps also developed through an earlier comprehensive plan) allows for a higher order of planning and strategizing when organizing land uses and infrastructure.

As is required under Provincial policy, development planning must be preceded by a watershed or subwatershed study to ensure that urban development will not result in undesired effects on the environment. Following completion of that study or in sequence with the subwatershed study, a comprehensive planning process may consider:

- natural and built heritage features and how to plan for their protection and incorporation into a new urban environment;
- infrastructure requirements for the community including transportation, water, wastewater, stormwater, and social infrastructure;
- an analysis of various land use concepts with a preferred overall community vision being the outcome of that analysis; and
- a final allocation of urban land uses with a plan for implementation.

A master planned, urban-adjacent community is likely a municipality's best opportunity to shape growth, build 15-minute communities, and cultivate results which support overall city-building goals.

#### 8.4 Complete Communities and 15-Minute Communities Across Waterloo Region

Waterloo Region, through ROPA 6, has championed the idea of “15-Minute Communities”, whereby a resident can access employment, amenities, necessities etc. within a 15-minute trip from home by walking, cycling, etc. The community of Ayr is a 15-minute community today and development of the Ballantyne Swan Street lands as a contiguous expansion of the settlement area will allow for further realization of the desired community building outcomes.

A Complete Community requires many things; it must be walkable, it should include varied and accessible parks and open spaces, there must be a range of uses capable of sustaining the daily needs of its residents, it must be home to a cross-section of people representing various levels of income and a wide cultural perspective, and it must allow for aging in place. Greenfield development presents a unique opportunity to cultivate and manifest these outcomes through intentional, informed design.

#### 8.5 Sustainable Homes

Over the last two decades there have been significant amendments to the Ontario Building Code, as well as advancements in building methods and materials. As a result, all new homes in Ontario have become more energy efficient and sustainable.

Homes within master planned communities are often built green and many new communities incorporate, among others, the following features:

<b>Water Conservation</b>	Water Recycling fully automated water recycling system that can reduce indoor water consumption by up to 25%
	Drain Heat Recovery pre-heats incoming cold water
	Fixtures - latest in low flow plumbing technology installed
<b>HVAC and Electrical</b>	Smart thermostat
	ERV, Low E argon filled windows, R-60 attic insulation, sealed ductwork
	2x6 exterior wall assembly and insulated sheathing for 25% better than Ontario Building Code standard
	LED lighting, motion activated lighting and dimmer switches
<b>Future Proofing</b>	Ready for Solar attic to basement conduit installed
	Rough in EV Charger conduit to garage installed



## Summary

For the reasons noted in this letter, it is our opinion that the Region of Waterloo should have included an LNA scenario similar to that provided in **Appendix 2**, providing medium density housing as the primary housing form for growth from 2022-2051.

In this regard, it is our opinion that 944 hectares of additional Community Area lands beyond the existing supply are needed to accommodate future residential development in Waterloo Region.

The Ballantyne Swan Street Lands should be included as additional Community Area to provide the Township and Region with land required to meet the 2051 growth targets.

The Ballantyne Swan Street Lands are able to contribute approximately 500 new homes toward meeting the Region of Waterloo responsibility for new home supply and towards meeting the provincial target of building 1.5 million homes by 2031.

These lands stand out in the Region of Waterloo as among the best opportunities to provide new community growth in a compact and complete community that logically and efficiently extends the settlement pattern in the Ayr community, within the Township of North Dumfries.

The Township of North Dumfries has repeatedly requested that the Ballantyne Swan Street Lands (1056 Swan Street) be considered as a candidate site for expansion of the Township Urban Area. Township Council, on June 6, 2022, passed a motion which, among other matters, included the following decision:

“That as part of the new Community Area Land Expansion under Option 2 assigned to North Dumfries, that the property identified as 1056 Swan Street as conceptually identified as Parcel B-1 on Schedule 3 attached be included in the expanded Ayr Urban Area Boundary;”

In response, the Region has established Policy 2.E.2.4 in ROPA 6 identifying that the portion of the Ballantyne Swan Street Lands which has not been included as additional Community Area through ROPA 6 shall be a priority expansion area for the next MCR, if there would be an identified land need at that time. MGP’s LNA (**Appendix 2**), completed in accordance with provincial requirements, has already confirmed 944 hectares of additional Community Area land beyond the currently supply is required to accommodate growth to 2051.

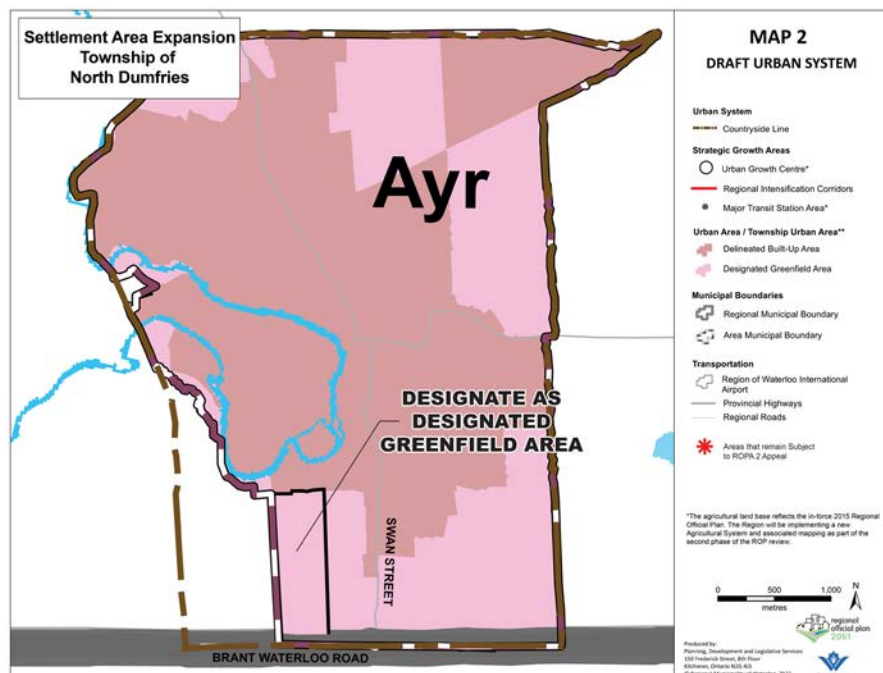
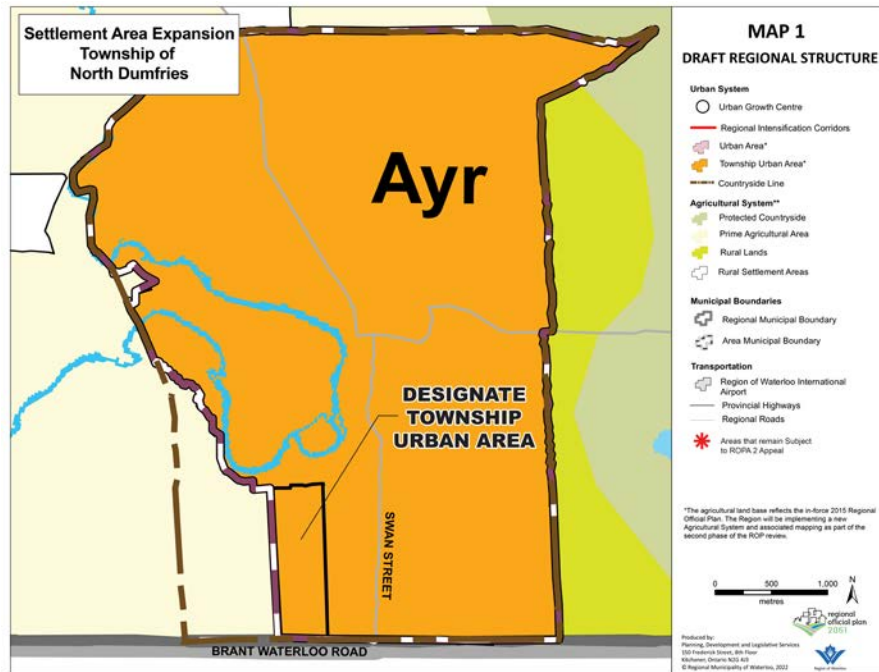
The Ballantyne Swan Street Lands are urban adjacent and have existing municipal services available which allow them to develop in an efficient manner and within a very short timeline. The lands are positioned to be developed as part of the existing complete community of Ayr and will provide connectivity and linkages to adjacent built and to be built approved neighbourhoods.

Furthermore, the Ballantyne Swan Street Lands are proposed to accommodate a mix of housing types, which will respond to market demand, and with high caliber, sustainable and green building standards.

The Ballantyne Swan Street Lands are not Protected Countryside lands and are within the Region of Waterloo Countryside Line and meet the applicable expansion evaluation criteria as demonstrated in **Appendix 4** and further are well suited to assist Waterloo Region in meeting its share of the Provincial target of building 1.5 million new homes by 2031 as well as the Region’s requirement to accommodate growth to 2051.

### Request of the Minister

We request that the Minister expand the settlement area boundary to include the Ballantyne Swan Street Lands (PIN 227180179) and surrounding area and designate these for community uses. As illustrated in the figures below and in **Appendix 4**, this entails a change to Map 1 to designate the property as Township Urban Area and Map 2 to designate the property as Designated Greenfield Area.



If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.



Yours very truly,  
Malone Given Parsons Ltd.

**Matthew Cory, MCIP, RPP, PLE, PMP**  
**Principal, Planner, Land Economist, Project Manager**

cc. 1054454 Ontario Limited  
Terry Ballantyne

**Attachments:**

- Appendix 1 WalterFedy Preliminary Servicing Overview Technical Memo*
- Appendix 2 MGP's Balanced Growth Scenario LNA for the Region*
- Appendix 3 Proposed Mapping Amendments to ROPA 6*
- Appendix 4 Summary of Responses to Settlement Boundary Expansion Criteria*
- Appendix 5 Previous Correspondence*
- Appendix 6 Township of North Dumfries June 6 Special Council Meeting Correspondence*
- Appendix 7 Proposed Conceptual Development Plan*