

January 4, 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: Syrier Holdings Inc. and Birdland Developments Inc. (Township of Woolwich - Elmira)
ERO No.: 019-5952 (Ministry Reference No. 30-OP-222206)
Comments on Waterloo Region Official Plan Amendment 6

Malone Given Parsons Ltd. ("MGP") are the planning and land economics consultants for Syrier Holdings Inc. and Birdland Developments Inc., owners of lands ("Subject Lands") identified for future residential development in the community of Elmira in the Township of Woolwich (the "Township"), one of the lower-tier municipalities in the Regional Municipality of Waterloo (the "Region"). I am writing to provide commentary on the ERO Posting of the Region of Waterloo Official Plan Amendment No. 6 ("ROPA 6"), as follows:

1. Subject Lands

The Subject Lands total approximately 45 acres and are contiguous to the built urban edge of Elmira, the largest Township Urban Settlement Area in the Township. The lands are located north of Listowel Road and west of Arthur Street South, as shown on Figure 1 below.

The Subject Lands have been located within the Countryside Line since it was first established in the Region of Waterloo Official Plan ("ROP"). They are within the Township Urban Area of Elmira and are designated as Township Designated Greenfield Area in the ROP. Accordingly, the Subject Lands have been identified as "Residential and Ancillary Use" in the Township of Woolwich Official Plan ("Township OP").

Despite sufficient capacity in existing Regional municipal wastewater infrastructure for an additional 6,000 residents in Elmira, the Subject Lands are identified in the Township OP with a prescribed development timeline of 2031 or beyond (Southwest Policy Area / Priority Area 1A-2).

A conceptual development plan for the lands which conforms to relevant provincial and municipal policies with respect to land use and density demonstrates capacity to provide over 350 housing units in the immediate term capitalizing on existing infrastructure located at the property limits.

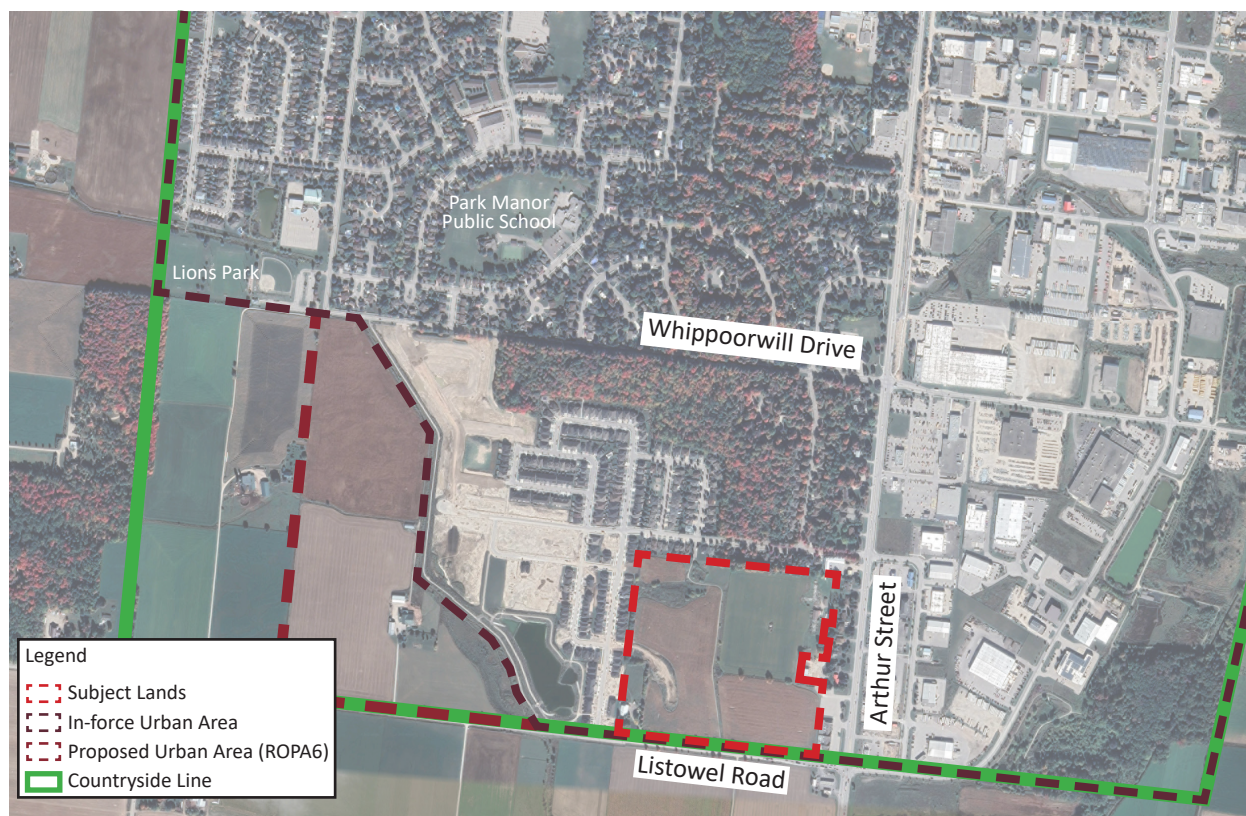


Figure 1: Subject Lands

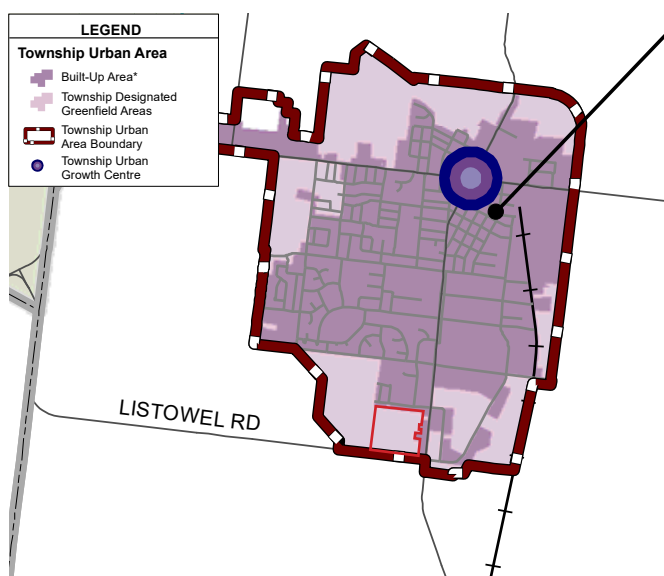


Figure 2: In-force ROP: Township of Woolwich Urban Area

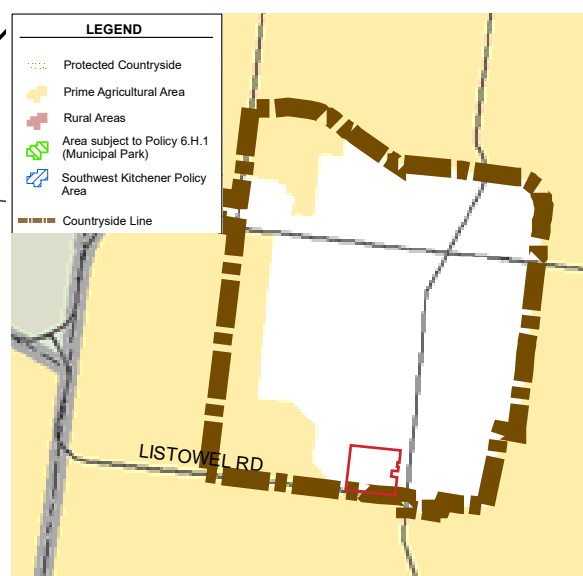


Figure 3: In-force ROP: Township of Woolwich Countryside Line

2. Impact of Local Planning Policies on Housing Delivery

Since 2009, our clients' lands have been identified in the ROP as "Township Designated Greenfield Area" for residential development.

To date, residential development and the delivery of the supply of housing on our clients' lands and across Elmira has been hindered by policies within the Township OP which restrict growth at 3% annually with a prescribed annual growth rate of 366 persons (Township OP Policy 7.29.3.1).

One of the key foundations for the existing growth management policies was the "Growth Management and Master Servicing Study for the Settlements of Elmira and St. Jacobs (1992)" which was implemented through Official Plan Amendment 32 (1992), a Township OP amendment which was eventually approved by the OMB in 1994. These types of restrictive growth management policies have been carried forward over a period of 30 years and are used to this day to restrict housing supply in Elmira and St. Jacobs.

The upper-tier ROP, through ROPA 6, contains policies (Policy 2.A.5) that prohibit lower-tier Area Municipalities from restricting the amount or timing of urban growth where planned infrastructure and community facilities are in place. Despite this, the existing Township OP contains growth management policies that are expressly designed to restrict growth.

Within the Township OP, our clients' lands are identified as the South-west Policy Area (Priority Area 1A-2) with a timeline for development at or beyond 2031 unless there is a resolution from Township Council to advance such timing.

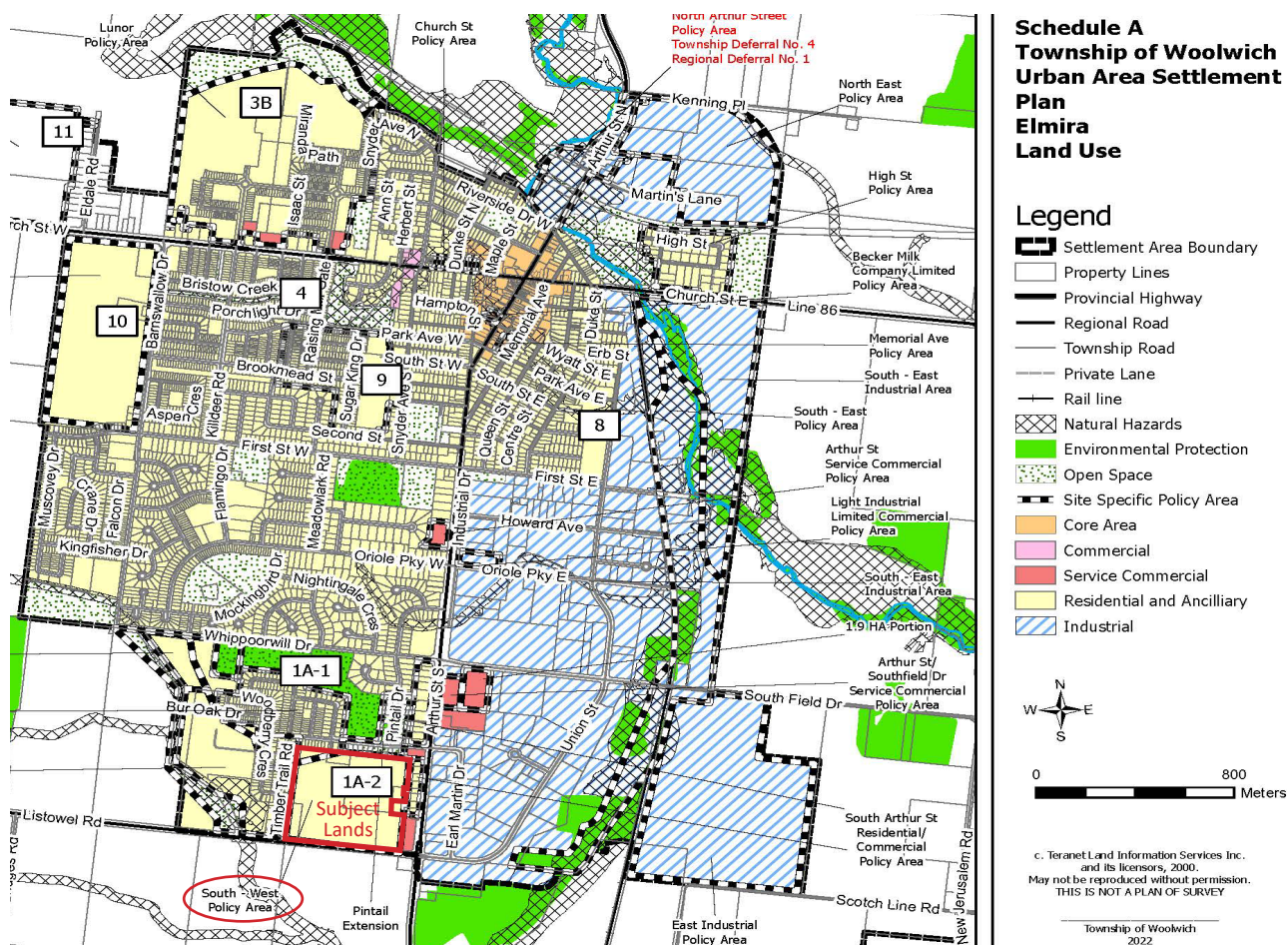


Figure 4: Township of Woolwich Official Plan - Urban Area Settlement Plan for Elmira, Land Use. Subject Lands depicted in red.

3. Planned Growth in Elmira

The Township OP (7.29.4.1) has identified a 2031 population target for Elmira of approximately 17,200. This represents close to half of the total 2031 growth target for Woolwich of 36,500.

The population in Elmira as of 2021 was 11,380 and net growth for the period of 2016-2021 was only 517 people which is an average of 103 persons per annum (Statistics Canada, 2021 Census data).

To achieve a population of 17,200 by 2031, Elmira will need to grow at a rate of 647 persons per annum, a significantly higher rate than that which is provided for in the Township OP of 366 persons.

Capacity in existing wastewater infrastructure can accommodate an additional 6,000 people within thousands of new housing units to 2031, as confirmed by WalterFedy in **Appendix 1**. Existing Township policies which artificially control the supply of housing are in direct opposition to the Province's stated priority to see a significant increase of housing built in Ontario over the next 10 years and beyond.

4. 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 individual municipalities across Ontario represent 1,229,000 of the identified 1,500,000 homes required by 2031.

Based on this allocation, the Province also recognizes the need to build over 270,000 homes in Ontario's smaller municipalities by 2031.

Woolwich Township, and specifically the highest-order Township of Woolwich Urban Area of Elmira, is well positioned to deliver a portion of those 270,000 homes identified to be built in smaller municipalities and help achieve the objective to build the much needed 1.5 million homes across Ontario by 2031.

The Subject Lands would represent a most suitable location to do so given existing Regional planning policy designations and infrastructure capacity.

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
Totals	1,229,000

Figure 5: ERO #019-6171 - 2031 Housing Targets



5.1 *Timing of Construction for New Homes*

New home construction could commence in 2024/2025 and very much contribute to meeting the identified 2031 provincial housing need with construction unfolding over a period of approximately 6 years.

Sanitary servicing stubs with adequate capacity presently terminate at the property boundary. Making use of these services in the immediate term represents an efficient use of existing municipal infrastructure investments which have already been made and provides for the ability to quickly bring new missing middle homes to market.

If planning approvals were achieved in 2023, grading and internal servicing could be achieved in 2024 and home construction could commence immediately thereafter.

Existing servicing capacity within Elmira can accommodate an additional 6,000 residents before system upgrades related to capacity would be required. Please see **Appendix 1** for a Preliminary Servicing Overview prepared by the consulting engineering firm WalterFedy outlining serviceability of the lands.

Summary

The Subject Lands have been identified in the ROP for residential development since 2009. They have been precluded from development on the basis of outdated growth restriction policies in the Township OP which are not in keeping with the modern Provincial mandate and stated priorities.

The lands abut the Built Up Area and have existing municipal services at the property limits, allowing them to develop in an efficient manner in a very short timeline. **Appendix 1** provides an overview confirming serviceability of the lands and the presence of sufficient infrastructure capacity.

The proposed plan of subdivision (**Appendix 2**) would allow for 350 new homes to be constructed, providing additional housing capacity for a population of about 950 people.

It is our expectation that through an eventual conformity update to the Township OP following provincial approval of ROPA 6, that conformity with Policy 2.A.5 will require amendments to the restrictive Township OP growth management scheme as it exists today.

Given the pressing need to construct new housing in Ontario, including in smaller urban municipalities such as Elmira, a site specific solution which supercedes existing restrictive growth management policies would allow the Subject Lands to form part of the solution to building 1.5 million new homes by 2031.

The Subject Lands are positioned to be developed as part of a complete community and will provide multi-modal connectivity and completion of adjacent built neighbourhoods.

As noted in this letter, development of the subject properties is long overdue; expediting development on them will assist the Township, Region, and Province in providing much needed housing. The properties can proceed to development with densities that assist in the achievement of the Region's designated greenfield density target.

Development can occur on the properties concurrent with the Region's realization of its intensification targets and will represent the orderly progression of development that is a logical extension of the existing settlement pattern in Elmira. The properties will be served by infrastructure and public service facilities required to meet resident's needs.

The scale of the properties allows future development to provide a range of housing choices to achieve a 15-minute neighbourhood, where the provision of this housing should be encouraged comprehensively and concurrently.

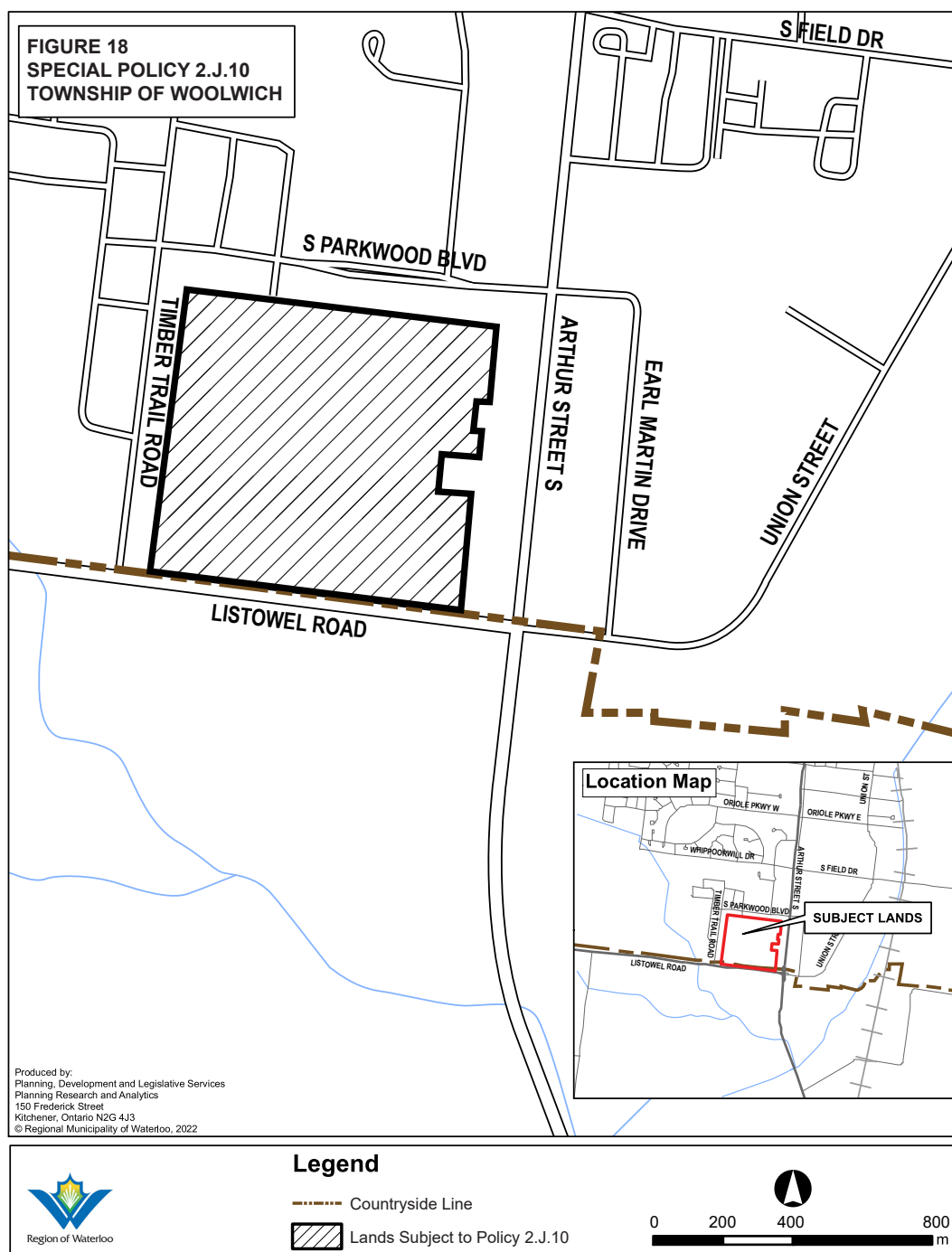
It is therefore our opinion that the properties should proceed immediately to development, and that any delay in development approvals relating to growth management or the phasing policies imposed by the Region or Township is not good planning and would be counter to the planning intent of the Province to expedite the delivery of homes and is not appropriate to impose under the policies of the Provincial Growth Plan or the Provincial Policy Statement.

The properties can and should move forward to development without further delay, and accordingly we request that a site-specific policy be included in the Region's official plan exempting the properties from any requirements for phasing.

Request of the Minister

We request that the Minister implement the following amendment to ROPA 6:

2.J.10 Notwithstanding any policies to the contrary, for the lands shown on Figure 18 within the Township of Woolwich (Part of Lot 86, German Company Tract) generally located north of Listowel Road, east of Timber Trail Road, south of South Parkwood Boulevard and west of Arthur Street North, development applications can proceed immediately and shall not be subject to any growth management or phasing requirements and any development on the lands shall not be required to be phased or staged.



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. Syrier Holdings Inc.
Birdland Developments Inc.

Attachments:

<i>Appendix 1</i>	<i>WalterFedy Preliminary Servicing Overview Technical Memo</i>
<i>Appendix 2</i>	<i>Proposed Concept Plan</i>
<i>Appendix 3</i>	<i>Proposed Mapping Amendment to ROPA 6</i>

