

**Environmental Registry of Ontario**

**No. 019-5952**

**Regional of Waterloo Official Plan Amendment No. 6**

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## EXECUTIVE SUMMARY

On August 18, 2022, Region of Waterloo Council adopted Regional Official Plan Amendment No. 6 (ROPA 6). ROPA 6 is now before the Minister of Municipal Affairs and Housing for approval. This submission is made in support of ROPA 6, with specific focus on issues related to determination of the amount of Community Area required in the Region of Waterloo to 2051.

The adoption of ROPA 6 marked the culmination of a multi-year cooperative effort between the Region, a wide group of stakeholders, the public and the local municipalities to develop a comprehensive plan to address the challenges facing the community as it prepares to accommodate the substantial growth that is forecast to occur over the next 30 years. Like all municipalities in southern Ontario, the challenges faced by the Region of Waterloo are substantial, with the need to address climate change, housing affordability, the housing needs of the aging Baby Boom generation and homelessness being at the top of the list.

ROPA 6 - with its focus on intensification first, complete 15-minute neighbourhoods, “missing middle” intensification in existing neighbourhoods, protection of farmland, and environmental and fiscal sustainability - addresses these challenges through a well-balanced policy framework embodying the broader public interest in the forward-looking innovative traditions of the Region of Waterloo.

This submission looks in detail at how the amount of land required to accommodate future Community Area growth is determined within the context of the Land Needs Assessment Methodology for the Greater Golden Horseshoe (LNA Methodology). The LNA Methodology provides direction on how to prepare housing-by-type forecasts for use in the implementation of the Growth Plan for the Greater Golden Horseshoe (Growth Plan). A key step in creation of a housing-by-type forecast is the application of age-specific “propensities to occupy specific dwelling types” to “forecasts of households by age”, calculated using household formation rates (see Appendix A).

Propensities of individuals to occupy specific types of dwelling units can be determined in two ways:

- Documenting the housing choices people have made in the past and extrapolating this forward onto future populations (historical-based propensities); or
- Projecting how people will act in the future with respect to housing choice taking into consideration past tendencies as well as evolving conditions, conditions which have only recently arisen, and predictable conditions that may not yet exist (forecasted propensities).

Land Economists have traditionally used historical-based propensities to determine the amount of each housing type required in the future. While they may be easier to determine, historical-based propensities fail to account for the changing environment within which decisions regarding what type of housing people need, want, or can afford are being made. Historical-based propensities, reflective of decisions made in some cases decades ago, fail to incorporate many of the changing factors affecting recent and future housing choices. The result is a housing by type forecast that in some cases mirrors the distant past, rather than reflecting the prosperous and sustainable future anticipated by the Growth Plan.

The Growth Plan was established to create/facilitate change in urban form as a means of addressing the negative outcomes associated with decades of construction that resulted in low density single-detached

dominated suburbs. Key objectives of the Growth Plan include significantly increasing intensification (housing construction in the Built-Up Area), creation of a broader mix of housing types in designated greenfield areas, creation of transit supportive communities and promotion of active transportation.

The more successful implementation of the Growth Plan is at creating such change, the less accurate historical-based propensities become. The Region of Waterloo is unquestionably the furthest along of any municipality in implementing the Growth Plan. This has resulted in rapid increases in intensification rates (from an estimated 15% in 2002 to 73% in 2019 - the last year before the pandemic) and a corresponding decline in the percentage of single-detached units constructed annually (from 73% in 2002 to 13% in 2019). As demonstrated by examples outlined in this submission, the use of historical-based propensities does not produce reliable forecasts where change of this nature has and continues to occur.

The LNA Methodology does not dictate how propensities are to be determined. This permits the Region of Waterloo, in full compliance with the provisions of the Growth Plan and the LNA Methodology, to move away from the use of historical-based propensities and instead forecast propensities that include consideration of evolving conditions, conditions which have only recently arisen, and predictable conditions that may not yet exist. To its credit, this is what the Region has done.

This submission provides background and analysis as to the appropriateness of the decision by the Region of Waterloo to utilize forecast propensities in determining the amount of Community Area required to accommodate forecast growth to 2051.

**ROPA 6 complies with the legislated requirements of the Planning Act, conforms to the Growth Plan and is consistent with the Provincial Policy Statement and the LNA Methodology. ROPA 6 is also strongly supported by the applicable First Nations (see Appendix B). There appears to be no Provincial policy basis that requires or even supports substantial Ministerial modifications to ROPA 6.**

This submission strongly urges the Minister of Municipal Affairs and Housing to support the Region of Waterloo in its efforts to ensure the residents of this community continue to experience a prosperous and sustainable future by approving ROPA 6.

## 1.0 INTRODUCTION

Municipalities need to be innovative to address challenges as they arise. The days of looking backwards and extrapolating forwards are over. Continuing to do things the same way when it no longer serves the overall best interests of residents, businesses, and institutions is no longer an option.

The Region of Waterloo has been at the forefront of municipal innovation since its inception. The landfill is running out of space, the Region initiates blue box recycling programs that help extend the life of the landfill by decades. Running out of water, the Region develops water conservation measures that eliminate the need for a pipeline. Major intersections are failing due to traffic congestion, the Region introduces roundabouts to free up traffic flow. The cumulative impacts of growth threaten natural systems, the Region introduces watershed planning. Key environmental lands are threatened, the Region establishes Environmentally Sensitive Policy Areas (ESPAs) and Environmentally Sensitive Landscapes (ESLs) to protect them. Municipal groundwater supplies are at risk because of industrial contamination, the Region develops water resource protection policies. Contaminated sites are becoming a blight on the urban landscape, the Region develops a brownfield financial incentive program to help unlock their potential. Agricultural land is threatened, the Region introduces the Countryside Line and helps intensify urban form through development of a light rail transit system. Most of these innovations were pioneered in the Region of Waterloo well ahead of other Ontario jurisdictions.

Today municipalities in Ontario face a new set of challenges, with the need to address climate change, housing affordability, the housing needs of an aging Baby Boom generation and homelessness being at the top of the list.

Over the past several years the Region of Waterloo has worked cooperatively with a wide group of stakeholders, the public, and the local municipalities to develop a comprehensive plan to address these challenges. The results of this process are contained in Regional Official Plan Amendment No. 6 (ROPA 6) that is now before the Minister of Municipal Affairs and Housing for approval. ROPA 6 - with its focus on intensification first, complete 15-minute neighbourhoods, “missing middle” intensification in existing neighbourhoods, protection of farmland, and environmental and fiscal sustainability - addresses these challenges through a well-balanced policy framework embodying the broader public interest in the forward-looking innovative traditions of the Region of Waterloo.

As when past innovative measures were first introduced, concerns have been expressed - primarily by the development industry – that ROPA 6 assumes too high a rate of intensification in addressing the future housing needs of the community<sup>1</sup>. The development industry instead supports an expansion to the urban area of approximately 950 ha of Community Area (800 ha more than proposed by the Region). This expansion is apparently intended to help alleviate affordability concerns by providing additional land for more low-density dwellings, and in particular single-detached units between now and 2051.

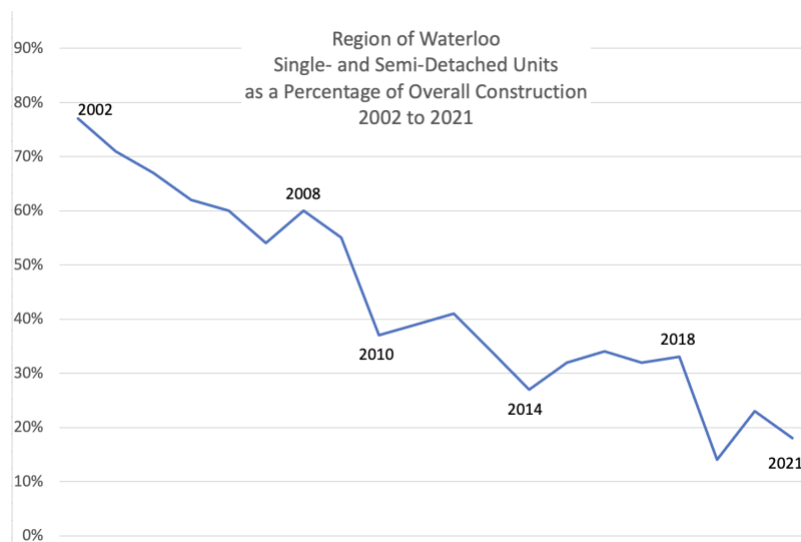
This submission addresses the issues related to determination of the amount of Community Area required in the Region of Waterloo to 2051.

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<sup>1</sup> The proposed Region-wide intensification target of 61% is slightly higher than the 59.5% rate of intensification achieved in the previous 10 years (2012 to 2021) and represents only a modest increase from the 55.6% intensification experienced in the Region of Waterloo from the coming into effect of the Growth Plan in June 2006 to the end of 2021.

## 2.0 RECENT TRENDS IN CONSTRUCTION OF SINGLE- AND SEMI-DETACHED DWELLINGS

The number of single- and semi-detached dwellings built annually in the Region of Waterloo has been declining steadily since 2002 (see below).



Many have speculated this decline in construction of new single- and semi-detached dwellings is the result of shortages in the availability of lands on which to build such units. This is not the case.

As shown below, there has been a relatively consistent combined inventory of registered unbuilt and draft approved lots available to accommodate construction of single- and semi-detached dwellings in the Region of Waterloo since the coming into effect of the Growth Plan for the Greater Golden Horseshoe (Growth Plan). The decline in construction of single- and semi-detached units did not occur because of a shortage of lots. It occurred because a facilitated change in the marketplace provided residents with an evolving range of housing, transportation, and lifestyle options.

**Year-End Inventory of Registered Unbuilt and Draft Approved Single- and Semi-Detached Lots in Plans of Subdivision (2006 to 2021)**

| Year    | Registered Unbuilt Single- and Semi-Detached Lots in Plans of Subdivision | Draft Approved Single- and Semi-Detached Lots in Plans of Subdivision | Total Registered Unbuilt and Draft Approved Single- and Semi-Detached Lots in Plans of Subdivision |
|---------|---|---|--|
| 2006    | 4,320   | 5,672   | 9,992  |
| 2007    | 3,884   | 7,754   | 11,638   |
| 2008    | 3,583   | 6,320   | 9,903  |
| 2009    | 3,073   | 5,985   | 9,058  |
| 2010    | 3,194   | 6,629   | 9,823  |
| 2011    | 2,824   | 5,954   | 8,778  |
| 2012    | 3,307   | 5,745   | 9,052  |
| 2013    | 3,005   | 4,860   | 7,865  |
| 2014    | 2,998   | 5,596   | 8,594  |
| 2015    | 2,558   | 6,523   | 9,081  |
| 2016    | 1,527   | 7,344   | 8,871  |
| 2017    | 1,726   | 6,347   | 8,073  |
| 2018    | 1,689   | 6,786   | 8,475  |
| 2019    | 1,986   | 6,128   | 8,114  |
| 2020    | 2,013   | 3,174   | 5,187  |
| 2021    | 1,699   | 5,810   | 7,509  |
| Average | 2,712   | 6,039   | 8,751  |

Source: Region of Waterloo Annual Inventory of Dwelling Units in Plans of Subdivision

### 3.0 DETERMINING FUTURE HOUSING TYPES

The Land Needs Assessment Methodology for the Greater Golden Horseshoe (LNA Methodology) provides direction on how to prepare housing-by-type forecasts for use in the implementation of the Growth Plan. A key step in creation of a housing-by-type forecast is the application of age-specific “propensities to occupy specific dwelling types” to “forecasts of households by age”, calculated using household formation rates.

Despite being a key input into determination of future demand for various housing types, the Provincial LNA Methodology provides no direction as to how propensities are to be determined. Specific references in the LNA Methodology to “propensities” are provided in Appendix A.

The term “propensities” is not defined in either the LNA Methodology or the Growth Plan. As a result, the common definition of “propensities” applies in interpreting the LNA Methodology. The Cambridge Dictionary defines “propensity” as:

“a tendency to behave in a particular way”

The propensities of individuals to occupy specific types of dwelling units can be determined in two ways:

- Documenting the housing choices people have made in the past and extrapolating this forward onto future populations (historical-based propensities); or
- Projecting how people will act in the future with respect to housing choice taking into consideration past tendencies as well as evolving conditions, conditions which have only recently arisen, and predictable conditions that may not yet exist (forecasted propensities).

Traditionally, land economists have used historical-based propensities to determine the amount of each type of housing required in the future. While they may be easier to determine, historical-based propensities fail to account for the changing environment within which decisions regarding what type of housing people need, want, or can afford are being made. For example, considerations related to affordability, life-style choices, housing type availability, tenure options, climate change mitigation requirements, transportation costs, transportation mode availability, family size, family formation timeframes, educational options, work at home opportunities, multi-generational responsibilities, length of retirement, life expectancy, availability of family support and community supported planning objectives are all key factors in determining where and in what type of housing people will live throughout the various phases of their lives.

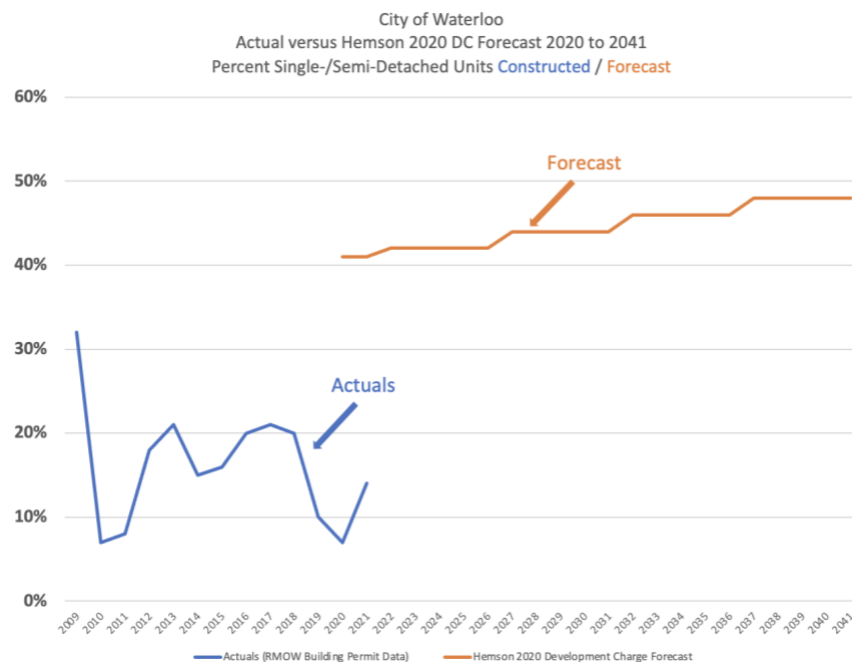
Historical-based propensities, which are in some cases reflective of decisions made decades ago, fail to incorporate many of the changing factors affecting recent and future housing choice.<sup>2</sup> The result is a housing by type forecast that in some cases mirrors the distant past, rather than reflecting the prosperous and sustainable future anticipated by the Growth Plan.

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<sup>2</sup> In the Region of Waterloo, housing-by-type forecasts using historical-based propensities are based almost exclusively on data from residential unit purchases made before the ION LRT was operational (residential units purchased pre-June 2019), whereas proximity to rapid transit is expected to be a significant factor in a much higher percentage of residential unit purchases in the future.

Considerations underlying housing choice in the Region of Waterloo today are significantly different than they were 20 years ago, and every indication is that such change will continue to occur well into the future.

The use of historical-based propensities in a rapidly changing decision-making environment can result in poor (and sometimes even absurd) outcomes. The recent forecast prepared for the City of Waterloo's 2020 Development Charges Background Study provides a good example of the failure of forecasts using historical-based propensities to reasonably project future housing choice (see below).



Not even half of the percentage of single- and semi-detached units forecast annually from 2020 to 2041 has been built in the City of Waterloo at any time since 2009 (despite having had approved single-detached lots available). **In the first two years of the forecast**, the City of Waterloo has issued building permits equal to 72% of all the apartments (2,245) anticipated by the forecast to 2029 (3,124) and 35% of the apartments anticipated to 2041 (6,404).

Two additional examples of forecasts applicable to the Region of Waterloo using historical-based propensities are noted below:

- 1) 2012 Market Forecast prepared by Altus Group Economic Consulting for the landowners participating in the 2012 Region of Waterloo Land Budget Ontario Municipal Board Hearing:
  - Market Forecast percentage of single- and semi-detached units (2006 to 2031): 64%
  - Actual percentage of single- and semi-detached units built (2006 to year end 2021): 31%

To year-end 2021, 15.5 years into the 25-year forecast (62% of the forecast period), building permits had been issued for 129% of the apartment units (28,724) that the 2012 Market Forecast predicted would be required from 2006 to 2031 (22,260). Correspondingly, building permits had been issued for only 31% of the Market Forecast prediction of single- and semi-detached units (19,741 of 63,800).



2) 2013 Greater Golden Horseshoe Growth Forecasts to 2041 – (Region of Waterloo 2011 to 2021 time period) - by Hemson Consulting Ltd. for the Province:

- Forecast percentage of single- and semi-detached units (2011 to 2021): 53%
- Actual percentage of single- and semi-detached units built (2011 to year end 2021): 27%

It should be noted that both these forecasts were prepared well into the forecast period, meaning data from early in these forecasts – 5.5 years of the 25-year Altus forecast and 1.5 years of the 10-year Hemson forecast – was already available when the forecasts were completed. This makes the significant variance between the forecasts and the resulting actuals even more striking.

The Growth Plan was established to create/facilitate change in urban form as a means of addressing the negative outcomes associated with decades of construction that resulted in low density single-detached dominated suburbs. Key objectives of the Growth Plan include significantly increasing intensification (housing construction in the Built-Up Area), creation of a broader mix of housing types in designated greenfield areas, creation of transit supportive communities and promotion of active transportation.

The more successful the implementation of the Growth Plan is at creating such change, the less accurate historical-based propensities become. The Region of Waterloo is unquestionably the furthest along of any municipality in implementing the Growth Plan. This has resulted in rapid increases in intensification rates (from an estimated 15% in 2002 to 73% in 2019 - the last year before the pandemic) and a corresponding decline in the percentage of single-detached units constructed annually (from 73% in 2002 to 13% in 2019). The use of historical-based propensities does not produce reliable forecasts where change of this nature has and continues to occur.

As noted above, **the Provincial LNA Methodology does not dictate how propensities are to be determined**. This permits the Region of Waterloo, in full compliance with the provisions of the Growth Plan and the LNA Methodology, to move away from the use of historical-based propensities and instead forecast propensities that include consideration of evolving conditions, conditions which have only recently arisen, and predictable conditions that may not yet exist. To its credit, this is what the Region of Waterloo has done.

#### 4.0 MUNICIPAL POLICY AND INFRASTRUCTURE DECISIONS INFLUENCE THE TYPE OF HOUSING PEOPLE CHOOSE

Policy and infrastructure decisions made by municipalities in response to the needs and desires of the community directly influence future housing choice. As with construction of the LRT, planning initiatives such as elimination of exclusionary zoning in whole or in part throughout the Region - which would facilitate development of “missing middle” intensification in existing neighbourhoods - and the creation of financial incentive programs aimed at construction of two- and three-bedroom apartments would potentially increase the range, mix and affordability of housing throughout the Region.

The historical-based propensity methodology supported by the development industry simply ignores such innovative possibilities.

The Growth Plan was specifically established to create/facilitate change in urban form making it hard to believe that the type of change promoted by the Growth Plan was not intended be factored into the land needs calculations. Forecasted propensities do just that. Historical-based propensities do not.

One of the benefits of a 30-year planning horizon is that innovation can be pursued with little risk to the housing market. If over time development doesn't occur as planned, there will be multiple opportunities in a 30-year planning period to make appropriate course corrections before the housing market is negatively impacted. This is precisely what the mandated five-year reviews of Official Plans are for.

## 5.0 HOUSING AFFORDABILITY

No credible study we have reviewed, or are aware of, has demonstrated that a shortage of land caused - or was even a significant factor in - the current affordability crisis.

The approximately 800 additional hectares the development industry is seeking to add to the urban area as Community Area would not be required (if needed at all during the planning period) until at least 2045. The argument that adding land to the urban area - land that won't come onto the market for another 20 to 25 years - will somehow help solve short- or even medium-term housing affordability issues is at best baffling and at worst disingenuous nonsense.

Developers sell new housing based on what the market will bear. This is expected in a free market economy, but that does not entirely free them up from bearing some responsibility for where we find ourselves. From the coming into force of the Growth Plan to year-end 2021, building permits were issued for an average of 3,822 residential units per year. Throughout this entire period, numerous opportunities were available in registered unbuilt and draft approved plans of subdivisions - an average of 19,256 units at year-end - to accommodate construction of additional residential units (see below).

**Year-End Inventory of Registered Unbuilt and Draft Approved Units in Plans of Subdivision (2006 to 2021)\***

| Year    | Registered Unbuilt Units | Draft Approved Units | Total Registered Unbuilt and Draft Approved Units |
|---------|--------------------------|----------------------|---|
| 2006    | 8,728                    | 9,876                | 18,604  |
| 2007    | 7,871                    | 12,893               | 20,764  |
| 2008    | 7,254                    | 10,834               | 18,088  |
| 2009    | 6,007                    | 10,581               | 16,588  |
| 2010    | 6,573                    | 12,412               | 18,985  |
| 2011    | 6,287                    | 10,593               | 16,880  |
| 2012    | 7,207                    | 11,549               | 18,756  |
| 2013    | 7,332                    | 9,850                | 17,182  |
| 2014    | 7,845                    | 11,778               | 19,623  |
| 2015    | 6,987                    | 13,098               | 20,085  |
| 2016    | 5,618                    | 14,637               | 20,255  |
| 2017    | 5,603                    | 13,649               | 19,252  |
| 2018    | 5,996                    | 14,967               | 20,963  |
| 2019    | 6,101                    | 14,525               | 20,626  |
| 2020    | 6,157                    | 14,981               | 21,138  |
| 2021    | 5,922                    | 14,387               | 20,309  |
| Average | 6,718                    | 12,238               | 19,256  |

Source: Region of Waterloo Annual Inventory of Dwelling Units in Plans of Subdivision

From 2006 to 2021, the average number of homes built in the Region of Waterloo's designated greenfield areas annually was 1,722. **This represents an average of only 9% of the approved housing units** (registered unbuilt and draft approved plans of subdivisions) available annually to support such development.

Presumably construction of some of these additional units would have occurred if the homebuilders had adjusted their prices and brought additional lots/blocks under their control onto the marketplace. They did not.

At least a partial solution to the affordability issues has been available to the development industry for years and their response appears to have been that low volume / high price is a more desirable business model today than low price / high volume. Why would anyone expect the development industry would deal with the additional greenfield lands they are proposing be added to the urban area any differently than they have the existing ones?

It is completely unrealistic to assume the affordable housing crisis we face today will be solved by the private sector. That is not the business they are in. Ultimately, the affordable housing crisis will only be resolved through partnerships between the Federal government, the Province, municipalities, non-profits, co-operatives, charitable organizations and other agencies. The private sector will play a supporting role in this process, but simply providing them with more urban designated land in the vain hope that somehow this will result in more and cheaper homes being built is not a realistic solution.

Through the policies proposed in ROPA 6, the Region is creating the opportunity for new forms of housing within the already built-up area, housing with at least the potential to be affordable, particularly when considered in the context of the associated costs of transportation. There is no indication this can similarly be achieved through construction of more low-density dwellings in greenfield areas.

## 6.0 IS THE REGION OF WATERLOO CURRENTLY EXPERIENCING A STRUCTURAL SHORTFALL IN HOUSING?

### 6.1 Comparisons to G7 Nations

Speculation that the Region of Waterloo is currently experiencing a structural shortfall in the number of residential units is being used by supporters of the development industry to justify the need for additional Community Area. The basis for this assertion is that the Region of Waterloo has fewer residential units - relative to its overall population – than the G7 nations.

Analysis of the data does not appear to support this assertion.

The number of homes required to house a given population depends on a wide variety of factors such as the average number of children in families, the divorce rate, life expectancies, the prevalence of multigenerational households and the relative ages of the populations.

While all these factors play a role, the median age of the county's population may be the best comparator for understanding the relative number of residential units required. Countries with lower median ages are more likely to have a higher percentage of homes occupied by families with children. As

a result, on average, more people will reside in each residential unit in such countries and fewer residential units will be required. Countries with higher median ages are more likely to have a greater number of homes occupied by empty nesters and seniors, with the result being, on average, that fewer people will reside in each residential unit and more residential units will be required.

The most recently reported median ages and average number of people per residential unit for the G7 countries and the Region of Waterloo are shown below.

| Country            | Median Age of Population | Persons per Residential Unit |
|--------------------|--------------------------|------------------------------|
| Japan              | 48.6                     | 2.3                          |
| Germany            | 47.8                     | 1.9                          |
| Italy              | 46.5                     | 2.4                          |
| Canada             | 41.8                     | 2.5                          |
| France             | 41.7                     | 2.2                          |
| United Kingdom     | 40.6                     | 2.4                          |
| United States      | 38.5                     | 2.5                          |
| Region of Waterloo | 38.0                     | 2.6                          |

Sources: worldpopulationreview.com / ceoworld.biz / Statistics Canada: Census of Canada 2021

The Region of Waterloo has a lower median age than any of the G7 nations (and considerably lower than some). As a result, it is reasonable to expect that the Region of Waterloo would have a higher average number of people living in each residential unit and therefore require fewer residential units relative to its population than any of the G7 nations. The data supports this.

A more reasonable way to determine if a structural housing shortfall exists in the Region of Waterloo would be to compare it to nations with similar median ages, those being the United States, Ireland, Australia, and New Zealand. The most recently reported median age and the average number of persons per residential unit for each of these countries and the Region of Waterloo are shown below.

| Country            | Median Age of Population | Persons per Residential Unit |
|--------------------|--------------------------|------------------------------|
| United States      | 38.5                     | 2.5                          |
| Region of Waterloo | 38.0                     | 2.6                          |
| Ireland            | 37.8                     | 2.8                          |
| Australia          | 37.5                     | 2.6                          |
| New Zealand        | 37.2                     | 2.7                          |

Sources: worldpopulationreview.com / ceoworld.biz / Statistics Canada: Census of Canada 2021

Countries with similar age structures - and similar cultural backgrounds – would be expected to have a similar average number of persons per residential unit. As would be expected, the Region of Waterloo generally falls in the middle of these countries with respect to this factor.

Based on this analysis, there does not appear to be the type of significant structural shortfall in housing units in the Region of Waterloo that would require a significant shift in planning policy. Are more housing units needed? Certainly, but adding additional land will not make this happen. Sufficient opportunities already exist through intensification and greenfield development to accommodate short- and medium-term increases in housing construction if required.

## 6.2 Do We Really Need 1.5 Million New Homes by 2031 as Identified by the Housing Affordability Task Force?

Without question, there is a need for more housing in the Region of Waterloo and communities throughout Ontario for which solutions need to be found. It is important, however, to properly understand the scale of the problem so that the solutions proposed are properly tailored to effectively address the issues. Significantly overstating or understating the problem means solutions proposed may not only be ineffectual in addressing the causes of the problem, but may compound it further.

Bill 23 and the associated changes proposed by the Province are predicated on the need for 1.5 million new homes by 2031. This target originated as a recommendation from the Province's Housing Affordability Task Force.

A recent report by the Smart Prosperity Institute: ONTARIO'S NEED FOR 1.5 MILLION MORE HOMES (August 2022) further examines this target.

The lead-in to this Report states:

**“The Task Force presented no details on how the 1.5 million figure was estimated; the figure also differs substantially from other estimates.”** [emphasis added]

One of the estimates the Smart Prosperity Institute may be referring to above is their own conclusion from a report they did in 2021 (Baby Needs a New Home) that Ontario needed 976,000 more homes by 2031.

The Smart Prosperity Institute's new report (August 2022) purports to test the Housing Affordability Task Force's 1.5 million target and concludes that 1.5064 million homes are needed by 2031, a difference of 54.3% from what they had projected just a year earlier and only a 0.4% variance from the unsubstantiated Housing Affordability Task Force target.

This new report has some questionable jumps in logic with no supporting analysis that I am aware of having been released to date [I have requested such back-up analysis and data with nothing additional being provided].

Of note is the very first sentence after Figure 2 in the report, which presents a comparison of headship rates<sup>3</sup> in Canada. This sentence states:

**These lower headship rates for persons under the age of 45 [in BC and Ontario] suggest housing shortages causing a reduction in family formations.** [emphasis added]

No analysis of the data. Nothing. Straight from the fact there is a difference to what caused it.

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<sup>3</sup> If there were 100 people aged 25 to 35, and 57 of them headed up households (household maintainer as defined in the Census) then the headship rate would be 57%. A household is considered a person living alone or any number of people living together. There is one head of household per housing unit no matter how many people live there. Therefore, one house is required for each head of household and the higher the headship rate the more houses are required.

There is a huge difference between correlation and causation. The data presented suggests a correlation exists between lower headship rates and fewer existing houses, but **in no way validates the causation assumed by the report – that there is a shortfall of homes causing the lower headship rates**. Where is the analysis to support this conclusion? Based on the information provided in the Report it would be just as defensible **to suggest exactly the opposite**, that lower household formation rates are the cause of the reduction in the number of houses being built, and indeed there are many socio-economic variables at play that would suggest this may well be true. The question of ***why*** the differences in headship rates exist across the country, the answering of which is a fundamental step in such research, is not addressed.

Based on this assumption - that lower headship rates are caused by a shortfall in homes - they create a "rest of Canada" headship target by subtracting Ontario and BC from the 2016 Canada wide data and somehow conclude that the resulting "rest of Canada" headship rates should be the standard we need to plan for in Ontario.

By applying this "rest of Canada" factor to Ontario<sup>4</sup>, they conclude that Ontario is suffering from 471,500 "suppressed" housing starts [a shortfall of that many housing units] and because of this, and the application of the "rest of Canada" headship rates to forecast development to 2031, conclude we need 1.5064 million new homes by 2031.

On what basis did they conclude that the "rest of Canada" [Canada minus BC and Ontario] somehow developed over the years with the perfect amount of housing such that in 2016 it represented something close to a Utopian housing market? I see nothing in their report that addresses this issue. The conclusion that somehow this apparently perfect "rest of Canada" housing market needs to be emulated in Ontario (despite the existence of different economic, social, and cultural factors) is equally puzzling.

Why did they use the "rest of Canada"? What makes it the perfect sample? Don't highly variable levels of intra-provincial migration in good and bad economic times make the population / housing units relationship in the "rest of Canada" a moving target?

What about differing post-secondary education rates between Ontario and the "rest of Canada" which delay household formation, as well as influence the ebb and flow of the young adult population moving from province to province? What about life-style differences (did people living alone in big cities like Toronto suddenly become a good thing)? What about divorce rates? What about the number of single parent households (created either through divorce or where one of the parents has had to move away for employment purposes)? What about the size of homes and their ability to accommodate larger or smaller groups of people? What about income levels? These are just some of the issues that potentially differentiate Ontario from the "rest of Canada".

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<sup>4</sup> For (hypothetical) example: If in a sample of 100 people aged 25 to 35, Ontario had a headship rate of 45% and the "rest of Canada" headship rate for that age group was 53%, the report would conclude that Ontario was somehow short 8 homes to house that group of 100 people. (53 homes existing for those 100 people in the "rest of Canada" – 45 homes existing for those 100 people in Ontario = Ontario being short 8 homes).

Why 2016? What identified that year as representing housing perfection in the "rest of Canada"? Nothing in the report appears to provide any justification for the use of the 2016 "rest of Canada" standard they assess Ontario against to arrive at the need for 1.5064 million new homes by 2031.

To use an analogy to explain these concerns, let's suppose there are two farmers, farmer Jones and farmer Smith that each have 50 head of cattle. If farmer Jones grazes his cattle on 40 acres of land and farmer Smith instead grazes hers on 30 acres, the logic espoused in the report would have one conclude that farmer Smith's cattle must be starving (or at least suffering from "suppressed" weight gain).

It doesn't seem to matter that the cattle may be different types, that the quality of forage may vary between the two farms, that grass maybe can't grow on a portion of farmer Jones' land, or if farmer Smith feeds her cattle a grain supplement. It also doesn't matter, apparently, whether there is underutilized forage left in farmer Jones' fields after his cattle finish grazing. Using the logic espoused in the Smart Prosperity Institute report, none of that type of information appears to be necessary for one to conclude that farmer Jones is awesome, and someone should call the SPCA on farmer Smith!

**No reasonable person would question that more housing is needed in the Region of Waterloo and communities throughout Ontario.** However, it appears that it is the sheer quantum of housing need "presented [with] no details on how the 1.5 million figure was estimated" by the Housing Affordability Task Force, supported by a massive unsubstantiated existing shortfall in housing by the Smart Prosperity Institute report has dramatically skewed discussions as to the amount of land required within urban areas.

We were pleased to hear Mr. Rod Regier, the Region of Waterloo's Commissioner of Planning, Development and Legislative Services - in response to a question at a recent Regional Council meeting - indicate that should the portion of the 1.5 million housing units assigned to the Region of Waterloo (70,800) be required by 2031, the Region would be able to accommodate such development from both an approvals and servicing perspective without adding any more land if the homebuilding industry were to pursue construction of such units.

### 6.3 If a Significant Shortfall in Housing Exists in the Region of Waterloo, What Caused it?

The apparent shortfall in housing units in the Region of Waterloo identified by the Province and the Smart Prosperity Institute must have been caused by a combination of:

- shortages of land on which to build housing units (no – there has always been plenty available with still over 35,000 units in greenfield plans of subdivisions and additional vacant land continuing to exist as of year-end 2021)
- slow municipal approvals stifling the marketplace (no - have had over a decade of approved greenfield and intensification units available almost continuously since 2006 – There was an annual average of over 19,200 draft approved and unbuilt registered units existing at year-end from 2006 to 2021, with the low being approximately 16,600 approved units in 2009. This compares to annual average construction in the greenfield of 1,722 housing units)

- constrained supplies of low-density housing available for construction (no - an average of over seven years in unbuilt registered and draft approved single- and semi-detached units has existed since 2006)
- shortages in sewer, water, landfill, and/or transportation services (no, no, no, and no - plenty continuously available and expansions planned and budgeted for to cover off future shortfalls)
- the absence of financial incentive programs (no – over the years the Region and local municipalities have actively participated in variety of financial incentive programs - DC waivers/tax increment grant programs etc. - aimed at encouraging the development of housing, particularly near transit)
- NIMBY issues significantly delaying development (no - pre-zoning for significant amounts of intensification is already in place and has been since 2006 thereby restricting the impact of NIMBY objections)
- high mortgage rates are making housing purchases unaffordable (no - at least until lately)
- interference by the Conservation Authorities (no - the GRCA has been an active partner in ensuring the necessary (sub)watershed studies required to responsibly open up new greenfield areas have been completed as demonstrated by the large inventory of approved units in such areas)
- failure to recognize and address affordable housing and homelessness issues (no – the Region has a Housing Division specifically intended to address these issues and has been a leader and an active participant in a wide variety of on-going initiatives. More to be done, but full credit due for efforts to date)
- failure to free up underutilized land owned by municipalities to accommodate housing (no - this has been an objective for decades ... there just isn't much of it)
- failure to take advantage of gentle intensification options (no - accessory dwelling units have become an important component of the new housing market, representing 9% of all new housing units in 2021. These types of units also represent a significant policy focus in Regional Official Plan Amendment No. 6 currently before the Minister for approval) and/or
- the upper tier approval authority role slowing down development (no - a previous review demonstrated that there was very little difference in processing times between when the Region of Waterloo was the approval authority versus where the City of Kitchener assumed that role (the Region was slightly quicker in processing subdivisions through to draft approval at that time). The real benefit in time savings was when the Province dropped out of the development review process in 1996, almost instantly resulting in a reduction in the processing times for plans of subdivision of almost 65%)

Well, then maybe it was the poor local economy (no – the Region of Waterloo has had one of the highest performing economies in Canada, if not North America, for decades).



So, if these didn't trigger the structural shortfall in housing units, what did? This is perplexing, especially when these represent virtually all the solutions the Province has identified to solve the apparent significant shortfall in housing existing in the Region of Waterloo.

With a healthy balanced market in lot/block availability for greenfield housing, substantial amounts of pre-zoned intensification opportunities, adequate service capacity availability, housing supportive incentive programs, a strong economy, active programs to address affordable housing and interest rates at historic lows for an extended period (until recently), it is unclear that a market existed in the past for the magnitude of housing units the Province and the Smart Prosperity Institute say should have been built. Clearly, the homebuilding industry here in the Region of Waterloo was not able to capitalize on it ... or maybe they simply ignored certain segments of the need.

Do we need additional forms of affordable housing in the Region of Waterloo to help alleviate homelessness, help individuals otherwise under stress, provide more options for young people starting out in home ownership, and places to go for some of the seniors moving out of it? Absolutely, but to the best of our knowledge nowhere near the magnitude of the shortfall of housing units identified by the Province.

The Region is working to resolve these issues through on-going housing initiatives such as implementation of the Region's 10-Year Housing and Homelessness Plan, the Waterloo Region Housing Master Plan, the Incentives to Create Affordable Housing program, and policies and programs that promote intensification.

Through these existing programs, which will be further enhanced by the policies in Regional Official Plan Amendment No. 6, the Region is creating the opportunity for new forms of housing within the already built-up area, housing with at least the potential to be affordable, particularly when considered in the context of the associated costs of transportation. There is no reason to believe this can similarly be achieved through construction of more low-density dwellings in greenfield areas, paving over green spaces and wetlands, elimination of Regional planning, or many of the other 'solutions' the Provincial government is proposing.

## 7.0 DOES THE REGION OF WATERLOO NEED TO SIGNIFICANTLY INCREASE HOUSING CONSTRUCTION TO MEET FUTURE DEMAND FROM THE FORECASTED POPULATION?

The Region of Waterloo has provided sufficient capacity for a combination of intensification and greenfield development to accommodate the entirety of the forecast population and associated number of housing units. In addition, the Region has confirmed that sufficient capacity is available to accommodate an increased number of housing units early in the planning period if increased near-term demand exists and the private sector responds to such demand by increasing housing construction. No additional land is required to be added to the urban area to meet either short- or long-term demands.

## 8.0 ARE AN INCREASED NUMBER OF SINGLE-DETACHED UNITS NEEDED?

Despite changing lifestyle choices, many young couples - if they could afford it - would likely choose to raise families in single-detached dwellings. While the cost of such units will take single-detached

ownership out of reach of many young people, there will probably remain a relatively strong demand in the future for such units. Can this demand be met?

The Region is proposing construction of approximately 21,000 new single-detached units to 2051.

The other source of inventory to meet future demand for single-detached dwellings is through the recycling of existing units. Of all the single-detached units that existed in the Region of Waterloo in 2016 (113,495) - the last year for which ownership by type and age of household maintainer data is available - 68% of these units (77,535) were owned by people who will be over 80 years of age (or dead) in 2051. It is not unreasonable to assume that most of these single-detached units will recycle by 2051 as seniors pass on, seek places of residence more conducive to an aging senior's lifestyle, or require the equity in their existing homes to help fund the remainder of their retirements.

An additional 22,430 single-detached units were owned in 2016 by people who will be between 70 and 80 years of age (or dead) in 2051. While in the past a significant number of these individuals have chosen to age-in-place (remain in the family home) throughout the early years of their retirement, recent research has demonstrated that the first five-year cohort of the Baby Boom generation in the Region of Waterloo sold their single-detached units immediately before and just after entering retirement at a rate 65% higher than the last five-year cohort of the previous generation.<sup>5</sup>

Altogether there is the potential for upwards of 90,000 single-detached units to become available to accommodate new demand through a combination of recycling and new construction from 2016 to 2051. For context, this is the equivalent of approximately **40% of all private homes** or **75% of all single-detached units** that existed in the Region in 2021.

There does not appear to be a need for more single-detached units than the Region currently forecasts, particularly if the Region is successful in achieving construction of the forms of housing attractive to aging seniors. This is precisely the type of issue that will be the subject of on-going monitoring. If a pending shortfall in single-detached units is discovered through this process, it can be addressed through the future mandated five-year reviews of the ROP.

## 9.0 THE OPTIMAL LOCATION FOR LANDS PROPOSED TO BE ADDED AS COMMUNITY AREA

One of the key challenges facing planners and politicians today is addressing the housing needs of the increasing number of existing residents who in the future will require housing conducive to seniors living. While the Cities of Cambridge, Kitchener and Waterloo have a considerable range of options available within which to accommodate the needs of their aging residents, the options available to Township residents are **extremely limited**.

Single- and semi-detached units constitute most of the housing in the four Townships, ranging from 84% of all residential units in Woolwich to 94% in North Dumfries (see below). While single- and semi-detached units may be suitable for early retirees, many older residents will likely require different types

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<sup>5</sup> *Growth Plan Target-Based Versus Market-Demand Land Needs Assessments - A Review of the Competing Land Needs Assessments Presented at the 2012 Region of Waterloo Official Plan Ontario Municipal Board Phase 1 Hearing* (2020) by V. Martin and K. Eby

of living arrangements due to changing life-style choices, declining health, or the need to access equity in their current homes to help finance their retirement years.

| Municipality               | Percentage Single- and Semi-Detached Units (2021) | Units other than Single- and Semi-Detached Units (2021) | Residents aged 80+ (2021) | <b>Additional</b> Residents Aging to 80+ Between 2021 and 2051* |
|----------------------------|---|---|---------------------------|---|
| Township of North Dumfries | 88%   | 455   | 335                       | 3,820   |
| Township of Wellesley      | 94%   | 190   | 315                       | 3,345   |
| Township of Wilmot         | 88%   | 965   | 1,005                     | 7,725   |
| Township of Woolwich       | 84%   | 1,500   | 1,250                     | 8,510   |

Source: 2021 Census of Canada

\* Includes individuals who may pass on during the 2021 to 2051 time period

While some degree of balance currently exists between the number of residents over 80 and the number of units with the potential to accommodate seniors later in their retirements (units other than single- and semi-detached units), the next 30 years will see the Townships experience a dramatic increase in the number of residents 80 years of age and older. In the absence of a concerted effort to increase the supply of housing conducive to late retirement seniors' needs and lifestyles, many current residents will have no choice but to leave the Townships later in life.

Through its Land Needs Assessment, the Region of Waterloo has determined that a limited amount of additional Community Area (150 ha) is required to accommodate the forecasted population. While some have questioned the decision to locate most of the new Community Area within the Townships, these additional urban lands will be used to help create more complete communities within the Township Urban Areas, as well as provide additional housing options for aging residents. Both are supportable and laudable goals from a planning perspective.

## 10.0 FISCAL SUSTAINABILITY

One of the key growth management challenges municipalities need to address is how to ensure fiscal sustainability over the long term. A 2013 study for the City of Ottawa demonstrated significant differences exist in the longer-term financial impacts faced by municipalities depending on the type of development occurring.<sup>6</sup> This finding was again confirmed in September, 2021, when Hemson Consulting Ltd. updated the previous study and found the City of Ottawa spends \$465 per person more each year to serve residential units on new low-density greenfield lands than it collects in revenue from property taxes and water bills. In contrast, the same update found that higher-density intensification contributed an annual net revenue of \$606 per person for the City.

Through its intensification first focus, ROPA 6 is providing a financially sustainable foundation for the Region of Waterloo as it works to address the challenges that will be faced over the next 30 years.

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<sup>6</sup> Update to Comparative Municipal Fiscal Impact Analysis by Hemson Consulting Ltd. (2013)

## 11.0 FIRST NATIONS ENGAGEMENT

The Region of Waterloo should be commended for undertaking a very successful engagement process with the First Nations. Comments received from the First Nations' representatives (see Appendix B) not only strongly support ROPA 6, but also speak highly of the respectful and productive relationships developed through this process.

## 12.0 CONCLUSIONS

The challenges municipalities in Ontario are facing over the next 30 years are substantial, with the need to address climate change, housing affordability, the housing needs of an aging Baby Boom generation and homelessness being at the top of the list.

ROPA 6 - with its focus on intensification first, complete 15-minute neighbourhoods, "missing middle" intensification in existing neighbourhoods, protection of farmland, and environmental and fiscal sustainability – seeks to address these challenges through a well-balanced policy framework embodying the broader public interest in the forward-looking innovative traditions of the Region of Waterloo.

**ROPA 6 complies with the legislated requirements of the Planning Act, conforms to the Growth Plan and is consistent with the Provincial Policy Statement and the LNA Methodology. ROPA 6 is also strongly supported by the applicable First Nations. There appears to be no Provincial policy basis that requires or even supports substantial Ministerial modifications to ROPA 6.**

We strongly urge the Minister of Municipal Affairs and Housing to support the Region of Waterloo in its efforts to ensure the residents of this community continue to experience a prosperous and sustainable future by approving ROPA 6.

## APPENDIX A REFERENCES TO “PROPENSITIES” IN THE LAND NEEDS ASSESSMENT METHODOLOGY FOR THE GREATER GOLDEN HORSESHOE

### **Methodology Overview – paragraph 3 – 2. Housing Need – page 8**

- *Through the use of household formation rates and **propensities to occupy particular dwelling types**, the population forecast is converted into a forecast of households by type of dwelling [emphasis added]*

### **Housing Need (Component 2) – paragraph 2 – page 10**

*The results of the forecast process are:*

- *Households by age - derived by applying age-specific household formation rates to the forecast of population by age group;*
- *Households by age and dwelling type - derived by applying **age-specific propensities to choose different types of dwellings** to the forecasts of households by age; and,*
- *Total households - the sum of all households [emphasis added]*

### **Housing by Dwelling Type – paragraph 1 – page 10**

*To forecast housing need, household forecasts by age are broken down by types of dwellings. **Municipalities will apply age-specific propensities to occupy various types of housing to the forecasts by age, calculated as part of the household formation rates.** [emphasis added]*

## APPENDIX B FIRST NATIONS' LETTERS OF SUPPORT



August 8, 2022

Rod Regier  
Commissioner  
Planning, Development and Legislative Services  
Region of Waterloo  
150 Frederick Street, 8th Floor  
Kitchener ON N2G 4J3

**VIA EMAIL: [RRegier@regionofwaterloo.ca](mailto:RRegier@regionofwaterloo.ca)**

Dear Mr. Regier

I am writing on behalf of the Mississaugas of the Credit First Nation (MCFN) Department of Consultation and Accommodation (DOCA) to express our appreciation for the early and thorough consultation you and your team undertook with us specific to the Region of Waterloo Official Plan Amendment. As the department responsible for protecting and advocating on behalf of MCFN territory and treaty rights, it was our hope that our input would be taken seriously and at least some of it considered when drafting the Amendment.

We appreciate Waterloo's sincere and pro-active approach to the consultation process. Consultation meetings were forthright and conducive to establishing an honest, respectful, and cooperative relationship between the MCFN and Waterloo. Questions, comments and concerns of the First Nation were diligently considered and acted upon by the Region.

As you know, it is the philosophy of First Nations to think seven generations ahead and we believe the proposed Amendment embraces that philosophy. In light of this, we are pleased to see that the proposed Growth Plan limits the amount of land the Region of Waterloo feels it needs in order to meet its growth requirements. As such, it is clear to us that you have taken our input into consideration when drafting the Amendment.

In closing I would simply say that the Mississaugas of the Credit First Nation supports the Region of Waterloo's proposed Growth Plan Amendment and that the consultation process with the Region of Waterloo was satisfactory in every respect. It is our hope that the current positive relationship will continue to grow between both treaty partners.



**DEPARTMENT OF CONSULTATION AND ACCOMMODATION**  
Mississaugas of the Credit First Nation  
4065 Hwy #6, Hagersville, Ontario N0A 1H0



Phone: (905) 768-4260





Sincerely,

Mark LaForme  
Director, Department of Consultation and Accommodation  
Mississaugas of the Credit First Nation



**DEPARTMENT OF CONSULTATION AND ACCOMMODATION**

Mississaugas of the Credit First Nation  
4065 Hwy #6, Hagersville, Ontario N0A 1H0



Phone: (905) 768-4260







July 13, 2022

Karen Redman  
Regional Chair  
Regional Chair's Office  
1st Floor, 150 Frederick Street  
Kitchener Ontario N2G 4J3

via email: [KRedman@regionofwaterloo.ca](mailto:KRedman@regionofwaterloo.ca)

Dear Chair Redman,

I would like to take this opportunity to thank the Region of Waterloo for the time and attention that has been taken in consultation with Six Nations of the Grand River Consultation and Accommodation Process (CAP) Team in regards to Region of Waterloo Official Plan.

We are very pleased that you have taken our values, world view, and beliefs into consideration when drafting your plan. The Region of Waterloo is embracing the idea of shared stewardship of the lands that we have called home since time immemorial. This is so important in the face of a rapidly changing climate.

As you know, the protection of the natural environment is paramount in our concerns and we are pleased that you have heard and understood our views. The Grand River is also of utmost importance as it the source of our drinking water and needs protection to the best extent that is possible.

As we are sure you would agree, and as we have stated repeatedly, the natural environment will do quite well without human intervention. As a matter of fact, the natural environment would thrive without human intervention but we, as humans, cannot survive without the natural environment. For instance, if all the trees were destroyed, we would die. If the waters or air were polluted, we would die. If the pollinators had nothing to pollinate, we would die. We are all connected and we need the natural environment to sustain us. That is the basis for our Thanksgiving Address or "the words that come before all else" in which we give thanks for all aspects of the natural environment and is also the basis of the Value Statement that we have shared with you.

We are very pleased to see that you have significantly limited the amount of land that the Region of Waterloo is in need of in order to meet the growth requirements as set out in the Growth Plan for the Greater Golden Horseshoe.

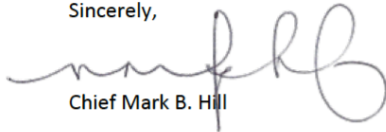
We are also very pleased that there will still be places in Southern Ontario where our future generations will have an opportunity to live in a world that is not made of steel and concrete, where they will still have the ability to put their feet on ground.



This is possible due to the efforts that the planning team at the Region of Waterloo are making today. That very much aligns with our view of looking ahead seven generations into the future and ensuring that what you are leaving them is something for which we can all take pride.

We are very much in support of the approach to planning that the Region of Waterloo has undertaken and look forward to a continued mutually supportive relationship.

Sincerely,

A handwritten signature in black ink, appearing to read 'm. hill', with a large, stylized loop at the end.

Chief Mark B. Hill

Six Nations of the Grand River Elected Council