



**4 JANUARY 2023**

**Ministry of Municipal Affairs and Housing  
Via Environmental Registry of Ontario, File No. 019-5952**

**RE: WRHBA Comments, Region of Waterloo Official Plan Amendment No. 6 (ROPA 6)**

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*Since 1946, the Waterloo Region Home Builders' Association (WRHBA) has stood as a pivotal key stakeholder in community development and an economic contributor in Waterloo Region. WRHBA member companies have worked to help shape the robust and thriving communities across our municipalities and townships for 75 years. WRHBA member companies construct over 90% of all new residential construction. The residential development construction industry is collectively one of the largest economic engines driving the Region's economy, creating over 20,500 jobs, 1.3 billion in wages, and 2.3 billion in investment value.*

We are writing in respect of ROPA 6, which is intended to implement the Region's municipal comprehensive review (MCR) to the 2051 planning horizon. WRHBA participated in the process leading up to the adoption of ROPA 6, including the submission of two written comments, which are attached hereto and provide the Association's substantive concerns with ROPA 6 and the underlying analysis.

Unfortunately, the adopted version of ROPA 6 does not address the Association's concerns, which include:

1. Consumer choice in housing, including the provision of a range and mix of housing types and tenures.
2. The provision of a range of affordability and attainability in housing choice throughout the Region, which is in part, dependant on Item 1 above.

Bill 23, as recently enacted by the Province, gives strong direction to municipalities for the provision of housing over the short term. Unfortunately, ROPA 6, in its current form, will not properly implement the objectives of Bill 23, or the objectives of WRHBA, as stated above.

These objectives, coupled with the laudable ten-year housing targets recently assigned to the Cities of Kitchener, Waterloo, and Cambridge by the Province, will require an aggressive growth management strategy that includes an appropriate and achievable intensification target and significantly more designated greenfield areas (DGAs) than have been proposed by ROPA 6. In fact, based on the Region's Land Needs Analysis (LNA), significantly more land is required than has been allocated through any of the three growth scenarios proposed by the Region's MCR and LNA. (See WRHBA's comment letter from May 27, 2022.) From WRHBA's perspective, there are obvious and fundamental flaws in the Region's LNA.

We are therefore requesting that the Region be directed to reconsider its LNA and MCR. Alternatively, we would ask that the Ministry expeditiously undertake to identify the appropriate land requirements, including intensification and density targets, in consultation with appropriate industry stakeholders. The necessary modifications should be made to ROPA 6 in short order, to provide the additional tools and permissions that the industry requires to help ameliorate the ongoing housing crisis and fulfill the objectives set out above.

The WRHBA thanks the Ministry for its consideration of these comments and concerns. We would welcome the opportunity to discuss these issues with the Ministry at the earliest available opportunity. The WRHBA looks forward to working with the Ministry and the local municipalities cooperatively to provide the housing that is critically needed across the Region.

Sincerely,

**WATERLOO REGION HOME BUILDERS' ASSOCIATION**



27 MAY 2022

**Via Email**

Chair and Members of Region of Waterloo  
Planning and Works, Regional Municipality of Waterloo  
150 Frederick Street, 3rd Floor Kitchener ON N2G 4J3

Dear Chair and Members of the Planning and Works Committee:

**Re: Region of Waterloo Official Plan Review, Draft Land Needs Assessment and Growth Options,  
Planning and Works Committee Public Meeting**

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*Since 1946, the Waterloo Region Home Builders' Association (WRHBA) has stood as a pivotal key stakeholder in community development and an economic contributor in Waterloo Region. WRHBA member companies have worked to help shape the robust and thriving communities across our municipalities and townships for 75 years. WRHBA member companies construct over 90% of all new residential construction. The residential development construction industry is collectively one of the largest economic engines driving the Regions' economy, creating over 20,500 jobs, 1.3 billion in wages, and 2.3 billion in investment value.*

We are writing in respect of the April 2022 Draft Land Needs Assessment and Growth Options Report (the "Draft Regional LNA") by Dillon Consulting Limited and Watson & Associates Economists Ltd. ("Dillon/Watson").

The WRHBA welcomes the opportunity to provide input to the Region of Waterloo's ongoing review of the Regional Official Plan ("ROP"). The WRHBA, in consultation with its members, has reviewed the proposed Land Needs Assessment ("LNA") prepared as part of the ROP review, as well as various independent comments and analyses undertaken in respect of the LNA. We understand that the LNA proposes three options for growth over the planning horizon to 2051. The LNA is a highly technical component of the ongoing review that will set the stage for growth and planning in the Region over the long term. It must be done correctly, based on the unique circumstances of the Region, and in accordance with provincial direction.

Based on our review, none of the three options appear to be viable and will only lead to exacerbation of current issues, including consumer choice in housing and housing affordability. None of the options properly implement dense, compact, complete communities as required by the Growth Plan for the Greater Golden Horseshoe, 2019, as amended ("**Growth Plan**"). In our respectful view, the LNA should be reconsidered for the following reasons.

- 1) The LNA does not conform with policies 2.2.1.5 and 2.2.8.2 of the Growth Plan and does not comply with the Provincial Land Needs Assessment Methodology for determining future growth needs of the Region. In particular, the LNA did not properly undertake a housing demand and supply analysis as required by the Methodology. A more balanced approach is required.
- 2) The total household forecast to 2051 is too low. There will be a shortfall in grade-related and medium density housing, placing an even greater emphasis on high-density units. We are at the point where construction costs are making high density development less affordable than lower density forms of development.
- 3) There are significant errors in the assumed existing land supply available to accommodate growth. These errors include:
  - a. Incorrect land use classifications assigned to Designated Greenfield Areas (“DGAs”);
  - b. The estimated net area of the DGA lands;
  - c. The total area of vacant land in the DGAs;
  - d. The population assigned to DGAs; and
  - e. The density assigned to the DGAs.
- 4) Further to Item 3 above, lands within the existing settlement boundary that have been counted towards existing supply should have been classified for employment uses and assumed not to be available for residential housing. Such areas of incorrect classification include:
  - a. The East Side Lands in Cambridge;
  - b. Conestoga College in Cambridge; and
  - c. New Dundee Road in Kitchener.

These classification errors result in an over-estimation of available supply of residential lands by 109 hectares.
- 5) Further to Item 3 above, the LNA erroneously assumed various lands to be vacant and available for residential land supply. These errors result in a significant over-estimation of available supply of residential lands.
- 6) Further to Item 3 above, none of the three growth options are based on actual planned densities for the existing supply of residential lands. In some instances, densities assigned to future communities would have to be revisited.
- 7) The LNA assumes a housing mix (particularly Options 2 and 3) that is heavily weighted to high-density development and is not likely achievable.
- 8) The intensification and density targets are high (Options 2 and 3) and likely not achievable in a number of municipalities. Alternatively, approved plans will need to be revised resulting in process delays and additional costs. Unachievable density and intensification input assumptions will further restrict the supply and delay the delivery of housing.

- 9) The LNA does not include an evaluation of settlement area expansion alternatives, contrary to provincial policies. As a result, significant investment in new infrastructure will be buried in the ground serving to increase the cost of housing, and underutilizing existing infrastructure that has already been paid for and constructed.
- 10) The LNA is based on outdated information from mid-2019. Significant development has happened since then. Significant areas of the DGA are built, constrained and/or not available to accommodate homes that are desperately required as illustrated in the MHBC slide deck presented May 18 2022 to the [Planning and Works Committee; Ref Meeting Minutes; Pg. 45-74](#)
- 11) The total capacity to accommodate required housing has been significantly overstated.
- 12) Given that the proposed supply of residential land (in Options 2 and 3) will fall woefully short of meeting the demands for housing to 2051, the existing issues with bringing housing to market will continue, thereby perpetuating the existing affordability crisis.

The WRHBA thanks the Region for its consideration of these comments and concerns. We would welcome the opportunity to discuss these issues with staff further prior to selection of the proposed growth option.

Sincerely,

**WATERLOO REGION HOME BUILDERS' ASSOCIATION**



*p.p.*

**Andrew Head**  
President



**Marie Schroeder**  
Executive Officer  
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cc: WRHBA Board of Directors  
WRHBA Municipal Liaison Chairs  
WRHBA Member Companies

Waterloo Region  
**Home Builders'**  
Association



*Promoting Building Excellence and Creating  
Communities in Waterloo Region Since 1946*



**27 JULY 2022**

**Via Email**

Chair and Members of Region of Waterloo Planning and Works Committee  
Regional Municipality of Waterloo  
150 Frederick Street, 2<sup>nd</sup> Floor  
Kitchener, ON N2G 4J3

**RE: WRHBA Comments, Draft Regional Official Plan Amendment (Growth-Related Component of Regional Official Plan Review), Statutory Public Meeting**

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We are writing in respect of Staff Reports PDL-CPL-22-21 and PDL-CPL-22-22, wherein Regional staff have recommended a growth option ("**Recommended Growth Option**") and proposed a Draft Regional Official Plan Amendment ("**Draft ROPA**") that would establish the planning framework for accommodating the Region's forecasted population and employment growth to 2051.

WRHBA previously submitted comments <[27 MAY 2022 WRHBA Ltr RoW ROP LNA Growth Options](#)> on the April 2022 Draft Land Needs Assessment and Growth Options Report by Dillon Consulting Limited and Watson & Associates Economists Ltd. ("**LNA**") in May 2022. In comparing the recommendation report PDL-CPL-22-21 to the LNA, it appears that none of WRHBA's comments have been addressed. In fact, it appears that the Recommended Growth Option would actually exacerbate the problems identified in our May 2022 correspondence.

The LNA set out three options for growth. The Recommended Growth Option is based on Option 2, modified to have a slightly higher intensification, slightly lower Designated Greenfield Area density and significantly less community lands to be added through a settlement area boundary expansion. As a result of these modifications, there is an anticipated shift to more medium and high density development. Given these changes, and the continued over-estimation of the capacity of the existing Designated Greenfield Areas, the opportunities for consumer choice and housing affordability will be significantly limited.

The WRHBA thanks the Region for its consideration of these comments and concerns. We ask that this letter be included on the Agenda for the July 27, 2022 Statutory Public Meeting. We are also requesting notice of Council's decision in respect of the draft ROPA.

Sincerely,

**WATERLOO REGION HOME BUILDERS' ASSOCIATION**



**p.p.**  
**Andrew Head**  
President



**Marie Schroeder**  
Executive Officer  
[Marie-schroeder@wrhba.com](mailto:Marie-schroeder@wrhba.com)

cc: WRHBA Board of Directors  
WRHBA Municipal Liaison Chairs  
WRHBA Member Companies