



October 17, 2022

Ministry of Municipal Affairs and Housing
17th Floor
777 Bay Street
Toronto, ON M7A 2J3

(via e-mail)

Attn: Hon. Steve Clark, Minister of Municipal Affairs and Housing

Re: Region of Waterloo Official Plan Review Amendment No. 6

Dear Hon. Steve Clark:

Thomasfield Homes is a Southern Ontario New Home Builder serving various communities in Ontario including Guelph, Kitchener, Waterloo, Cambridge, Breslau, Woodstock, Acton, Burgessville, and Grand Valley with over forty years of home building experience and over 7,500 homes built.

We still believe that ground-related dwellings predominantly single-family home is the Canadian Dream, this is reflected in the market demand for single-family homes. We believe this is reflected in the housing choices of the majority council and most senior members of Staff and the various presenting special interest groups in the Region of Waterloo. Region of Waterloo approved Official Plan Amendment No. 6 as presented will not provide an equitable, thriving, sustainable Waterloo.

Smart Prosperity Institute 2021 released a new report regarding Housing Needs: In the Region of Waterloo from 2021 to 2031, 62,677 new young families occupying low and medium densities will be formed. This will be offset by 20,489 older families leaving existing low and medium-density housing. The region's relatively young population ensures that the generational turnover of low and medium-density households will stay relatively modest until the middle of the century.

That is a need for 42,000 new homes over the next 10 years. I know we won't be able to meet that demand. I do hope the Minister's direction on Official Plan reflects the market's demand for single-family homes/low-rise construction.

On August 18, 2022, Council of the Region of Waterloo approved Official Plan Amendment No. 6, an amendment to establish the planning framework for accommodating the Region's forecasted population and employment growth to 2051. Official Plan Amendment No. 6 resulted in a total of 150 hectares for community area growth and 456 hectares for employment area growth, contrary to the Land Needs Assessment presented to Council at the Planning and Works Committee meeting on April 12, 2022.

The Land Needs Assessment was prepared by Dillon Consulting Limited and Watson & Associates Economists Ltd. (dated April 2022) which identified three options for growth in the Region, as follows:

- Option 1: Growth Plan Minimum
 - Minimum density target of 50 pj/ha for the Designated Growth Area ("DGA") and minimum intensification target of 50% for the Built-Up Area ("BUA")
 - Community Area expansion of 2,208 ha
- Option 2: Compact Development, Modest Community Area Expansion
 - Average density target of 60 pj/ha for the DGA and average residential intensification target of 60% for the BUA
 - Community Area expansion of 376 ha
- Option 3: More Compact Development, Modest Community Area Expansion
 - Average density target of 66 pj/ha for the DGA and average intensification target of 60% for the BUA
 - No Community Area expansion

As previously noted, the Draft Land Needs Assessment was brought forward to Regional Council at the Planning and Works Committee meeting on April 12, 2022 for informational purposes with the three options noted above. Following initial input from Council and delegations at the April 12, 2022 meeting, Regional staff brought forward a recommendation report to Regional Council on June 29, 2022 to endorse a growth option that accommodates 150 hectares of growth to the Community Area and 456 hectares of growth to the Employment Area. The approved growth numbers are a significant reduction from the growth options (Option 1 and Option 2) as presented in the Land Needs Assessment.

It is noted that following the April 12, 2022 Regional Planning and Works Committee meeting, Planning Staff of the Township of Woolwich recommended to Township Council

at their June 6, 2022 Council meeting to support Option 2. Their recommendation included support for a portion of Thomasfield's lands located at 2450 Victoria Street North in Breslau to be included within the designated settlement area for the Breslau area. This recommendation was countered by the no growth scenario directed by Council.

In recognition of the current growth trends and housing needs in the Region of Waterloo, it is our opinion that Option 2 of the Draft Land Needs Assessment, requiring 356 hectares of growth to the Community Area, is most reflective of the housing tenure forms in the Region, while allowing for moderate growth and reflecting the clear and desirable need for additional housing, including a diversity of housing types, to address the ongoing housing crisis.

Official Plan Amendment No. 6, as forwarded to your offices for approval, would result in a reduction of 206 hectares of community area growth than identified as Option 2 in the Land Needs Assessment. This does not reflect the housing needs for the Region and may compromise the ability to provide the necessary housing in the region to build more family sized units and address the housing shortage.

Our concern is that the endorsed growth option by Regional Council does not reflect the actual housing needs for the Region of Waterloo and will negatively affect the ability to provide an appropriate range and type of housing. It is noted that various professionals/experts had provided information and delegations to Regional Council and Regional staff identifying concerns with the methodology and implementation of the Land Needs Assessment. This warrants further consideration by the Ministry prior to approving the Official Plan Amendment.

As such, we would respectfully request that the Ministry of Municipal Affairs and Housing consider additional growth to the Community Area as part of it's review of the Region of Waterloo Official Plan Amendment No. 6.

This study will have an impact on the region for the next 30 years. While the process has been well attended by special interest groups. I would say the engagement from the general public has been weak. We have to consider the silent majority, those who want to raise their children in ground-related dwellings. We have to consider the citizen who hasn't moved to the Region. The new Canadian who has yet to move to the country to realize their Canadian dream of owning a detached home.

This additional land is sorely needed. We are in the middle of a generational supply challenge and this is reflected in the sky-high prices for homes in the Region. Despite what some special interest groups may say the decline in the volume of sales is due to the supply. The only way to fix this is more supply, especially in low-rise housing. The approved land is taking way too long from draft plan approval to building permits.

We would be happy to discuss our request with you in more detail. If you have any questions or require any further information, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom McLaughlin', with a stylized flourish at the end.

Tom McLaughlin

VP Finance

Thomasfield Homes

Cc . Mike Harris,