

January 3rd, 2023

Submitted Online

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

Dear Minister Clarke:

RE: Comments on Region of Waterloo Official Plan Amendment 6
Environmental Registry Posting Number 019-5952
Ministry Reference Number 30-OP-222206

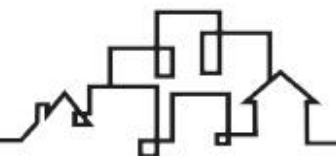
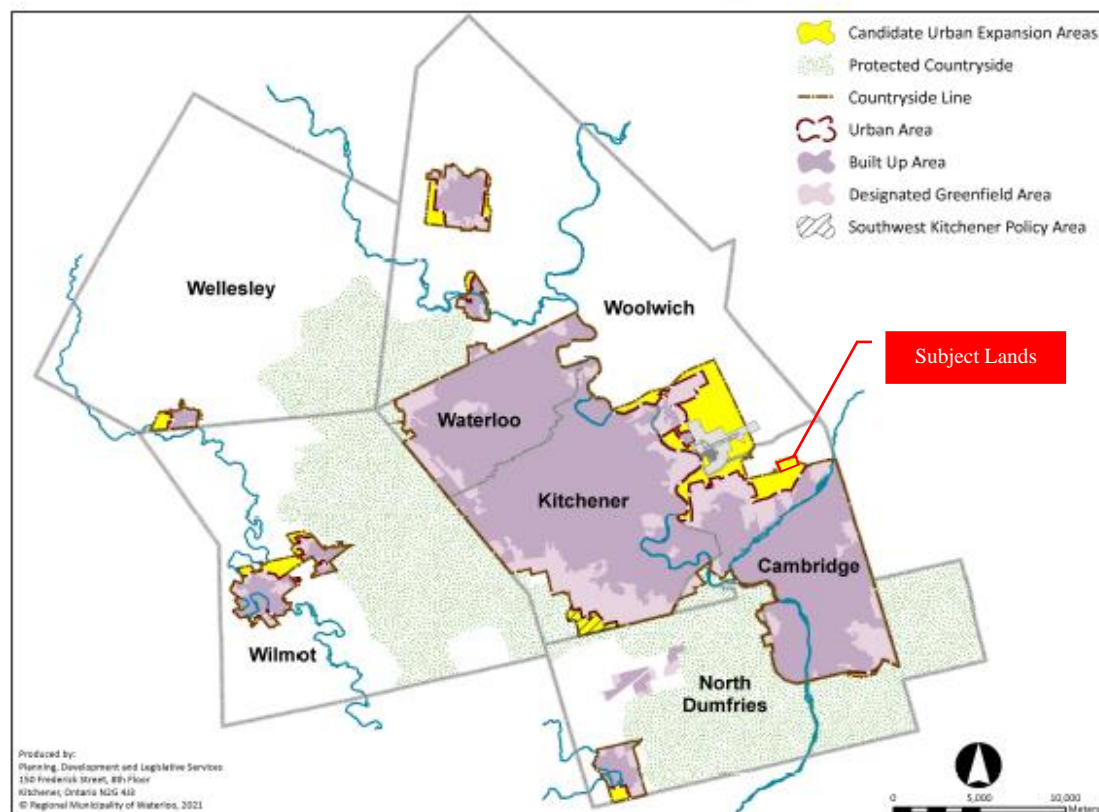
We are writing with respect to the Region of Waterloo's Official Plan Amendment 6 (ROPA 6) which was adopted by Regional Council in August 2022 and forwarded to the Minister for approval. We are the applicant for the lands legally known as PT LT 128 GERMAN COMPANY TRACT TWP OF WATERLOO & PT LT 1 BEASLEY'S MIDDLE BLK TWP OF WATERLOO (AKA BRICKER LT) PT 3, 58R14863; PT LT 1 BEASLEY'S MIDDLE BLK TWP OF WATERLOO (AKA BRICKER LT) PT 6, 58R14863 (CLOSED BY BY-LAW 145-05 INST. WR179575) CAMBRIDGE and PT LT 128 GERMAN COMPANY TRACT TWP OF WATERLOO & PT LT 1 BEASLEY'S MIDDLE BLK TWP OF WATERLOO (AKA BRICKER LT) PT 1, 58R14863; PT LT 1 BEASLEY'S MIDDLE BLK TWP OF WATERLOO (AKA BRICKER LT) PT 4, 58R14863 (CLOSED BY BY-LAW 145-05 INST. WR179575) CAMBRIDGE the City of Cambridge (the "Subject Lands").

The Subject Lands are regular in shape and encompass 51 hectares of developable land. The Subject Lands have the potential to bring on in excess of 1,400 to 2,000 new attainable housing options to the Region of Waterloo and the City of Cambridge in the short term and will assist the Province in meeting its housing objective of 1.5 million new homes in the next 10 years and more specifically, the City of Cambridge achieving its 2031 housing target of 19,000 new homes. **It is our submission that the Subject Lands be included in the Region of Waterloo's Urban Area as residential land as part of a modified approval of ROPA 6, as shown in Appendix A and B,** and we are requesting that the province exercise their power to do so under the authority of the Planning Act.

The Subject Lands are Candidate Urban Expansion Lands

The Subject Lands are located between the Urban Area boundary of the City of Cambridge ("Cambridge") and inside the Countryside Line. The in-force ROP identifies the Countryside Line as the long-term boundary between the existing Urban Areas and the countryside. Lands within the Countryside Line have been identified by the Region of Waterloo as potential areas to support long term development for future residential, employment and other development needs. Lands located within the Countryside Line are the priority for new growth areas. In the June 10th, 2021 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Preliminary Growth Scenarios and Evaluation Criteria, **Regional staff identified the Subject Lands as Candidate Urban Expansion Lands:**

Candidate Urban Expansion Areas



Extracted from June 10, 2021 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Preliminary Growth Scenarios and Evaluation Criteria

In the *June 2022 Region of Waterloo Land Needs Assessment Addendum*, as presented by Regional staff at the June 29, 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting, the Subject Lands were identified as Settlement Area Boundary Expansion (SABE) potential Lands between the Urban Area and Protected Countryside Line. As outlined in Table F-1 below as well as the Supplemental Map identified as Figure F-3, the Subject Lands are included within the 523 hectares of SABE potential lands within the Countryside Line in Cambridge:

Table F-1
Region of Waterloo
Cities Estimated Settlement Area Boundary Expansion (SABE) Potential
Lands Available for Urban Expansion, Land Area, ha

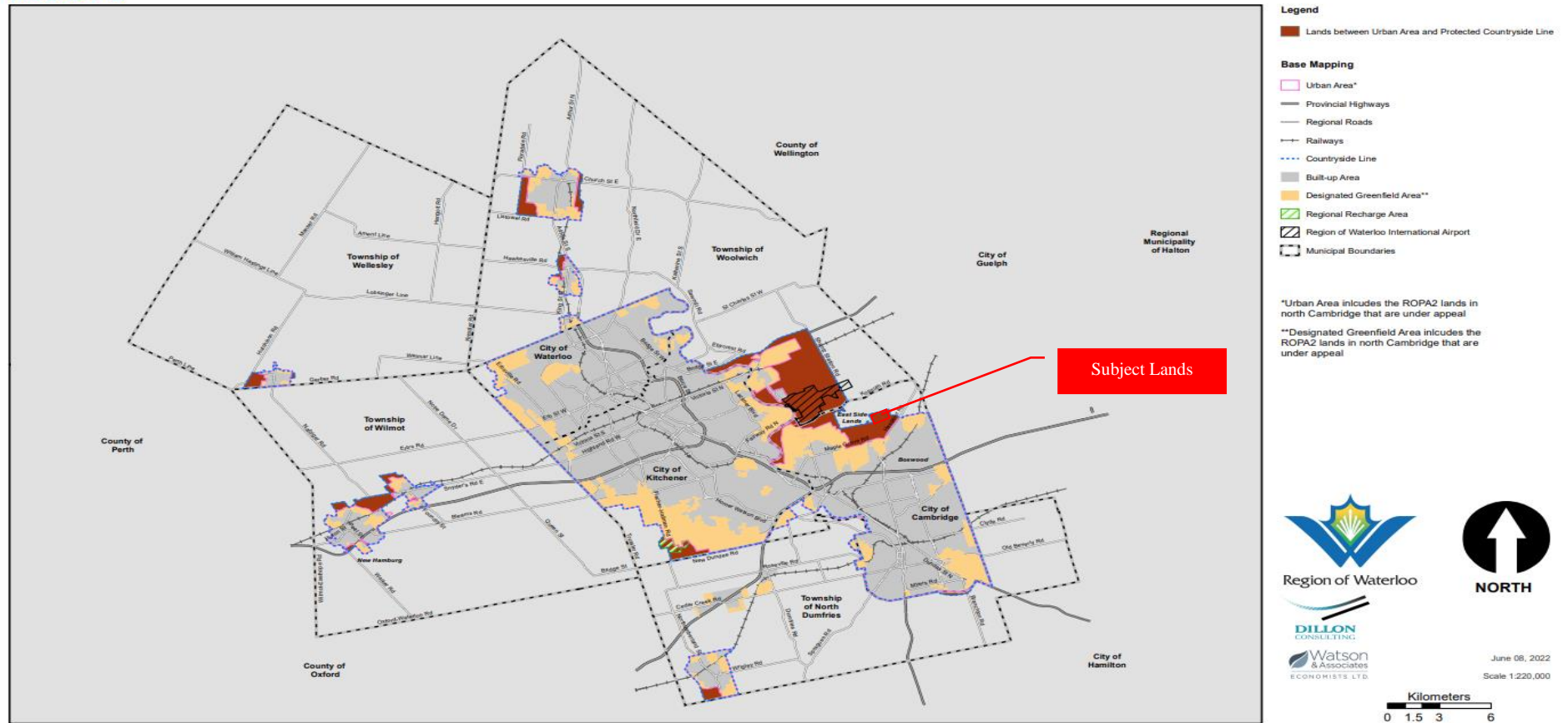
Urban Settlement Area	Cambridge	Waterloo	Kitchener	Cities
SABE Potential, within Countryside Line	523	0	135	658
SABE Potential, outside Countryside Line, Excluding Protected Countryside	963	0	70	1,033
Total Expansion Potential, ha	1,486	0	205	1,691

Note: Townships are not as constrained by SABE opportunities.

Source: Based on information from the Region of Waterloo by Watson & Associates Economists Ltd.

LANDS BETWEEN URBAN AREA AND PROTECTED COUNTRYSIDE LINE

FIGURE F-3



Extracted from June 29, 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan. Region of Waterloo Land Needs Assessment Addendum.

There is Sufficient Forecasted Growth to support additional Community Area Expansion in Cambridge

The Region's LNA, and associated technical analysis completed as part of the ROP review processes identified three growth scenarios and a final preferred growth scenario that was ultimately supported through the Region's adoption of ROPA 6. The chart below summarizes the community area land expansion required for Cambridge until 2051 under each growth scenario:

Growth Scenario	Growth Scenario Description per the Region's LNA	Cambridge Community Area Land Need
Option 1	Growth Plan Minimum	1,310 Hectares
Option 2	Compact Development, Modest Community Area Expansion	146 Hectares
Option 3	More Compact Development, No Urban Expansion of Community Area	0 Hectares
Preferred Option	Recommended Approach to Growth as approved in ROPA 6	8 Hectares

Extracted from June 29, 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan

In the *June 2022 Growth Option Evaluation Technical Brief* prepared by Dillion Consulting Limited and Watson & Associates, as presented at the June 29th 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan, Dillon and Watson concluded Option 2 as being the most preferred growth scenario for the Region of Waterloo, with the following extracted:

“Option 2 best positions the Region to achieve the wide range of planning objectives, as it offers the best outcomes from a growth management, livability and economic growth perspective while also addressing a number of agricultural, infrastructure, natural environmental and climate change and energy transition objectives. “

After considering the 8 hectares of community area land expansion approved through ROPA 6 for the Cambridge, there remains a community area land expansion requirement of an additional 138 hectares under the Option 2 growth scenario for Cambridge. The Subject Lands comprise 51 developable hectares, have been identified by the Region of Waterloo as candidate urban expansion lands, and can easily be accommodated within the additional 138 hectares of community area land expansion required under the preferred Option 2 growth scenario.

Existing and Planned Infrastructure for the Subject Land

As identified in the *Infrastructure Review and Class D Cost Estimate Technical Memorandum* as prepared by Dillion Consulting Limited and included in the June 29th 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting; there is sufficient capacity in existing or planned water and wastewater infrastructure to accommodate additional population growth and community area land expansion in Cambridge:

Wastewater

Wastewater generated in Cambridge is treated at the Galt, Preston and Hespeler WWTPs. In 2020, the Galt, Preston and Hespeler WWTP had capacity of 112,173 people. The additional population growth for

Cambridge under both the Region of Waterloo's recommended approach to growth (54,100 people) and under the Option 2 growth scenario (72,800 people), the preferred growth scenario of the Region's consultants, Dillion and Watson, is within the remaining capacity of the existing Cambridge WWTPs (112,173 people) without requiring a plant expansion. Therefore, with the Subject Lands representing only 51 hectares of the 138 hectares of additional community land required to satisfy the community area land expansion under the Option 2 growth scenario, there is adequate plant capacity to ensure the timely development of the Subject Lands.

It should also be noted that Region of Waterloo, as apart of its 2018 WWTMP, identified the feasibility of expanding the Hespeler WWTP by adding tertiary and conventional activated sludge treatment to the existing facility. This would provide Cambridge the ability to plan for a population growth in excess of both the 54,100 people under the recommended approach to growth as well as the 72,800 people under Option 2.

Water

Cambridge is serviced by the Integrated Urban water System (IUS) which services Elmira, St. Jacobs, Conestogo, West Montrose, Breslau, Lloyd Brown, St. Agatha, and the cities of Kitchener, Cambridge and Waterloo. There is sufficient capacity in the IUS to accommodate any of the three growth options prepared by the Region for the City of Cambridge until 2051.

Additional Designated Employment Lands in Cambridge

The Region of Waterloo, through the adoption of ROPA 6, designated a 187 hectares of new employment land in Cambridge. We believe this is an important and necessary step to ensuring Cambridge maintains its competitive position of both attracting and maintaining significant regional, provincial, national and international employers. We believe it is equally important to ensure attainable, ground-based housing is made available for the current and future employees of Cambridge's large employment base. The inclusion of the Subject Lands, with its potential of 1,400 to 2,000 new housing units will support Cambridge's future economic growth.

Conclusion

The Subject Lands will support completing the existing community of Cambridge; bring on much needed new housing options to the Region of Waterloo and Cambridge; and will support Cambridge in meeting its 2031 housing target of 19,000 new homes. The Subject Lands are located within the Countryside Line, have available existing and planned water and wastewater infrastructure and have been identified by the Region of Waterloo as Candidate Urban Expansion lands to accommodate future population growth in the City of Cambridge. The inclusion of the Subject Lands can conform to the policies of the Provincial Policy Statement and Growth Plan.

We thank you for the opportunity provide input into ROPA 6. If you have any questions or wish to discuss this letter, please do no hesitate to contact the undersigned at any time.

Sincerely,



Michael DeBiasio
Development Manager, LV Development Ventures Inc.

Encl.

Cc: Hannah Evans, Assistant Deputy Minister

Links:

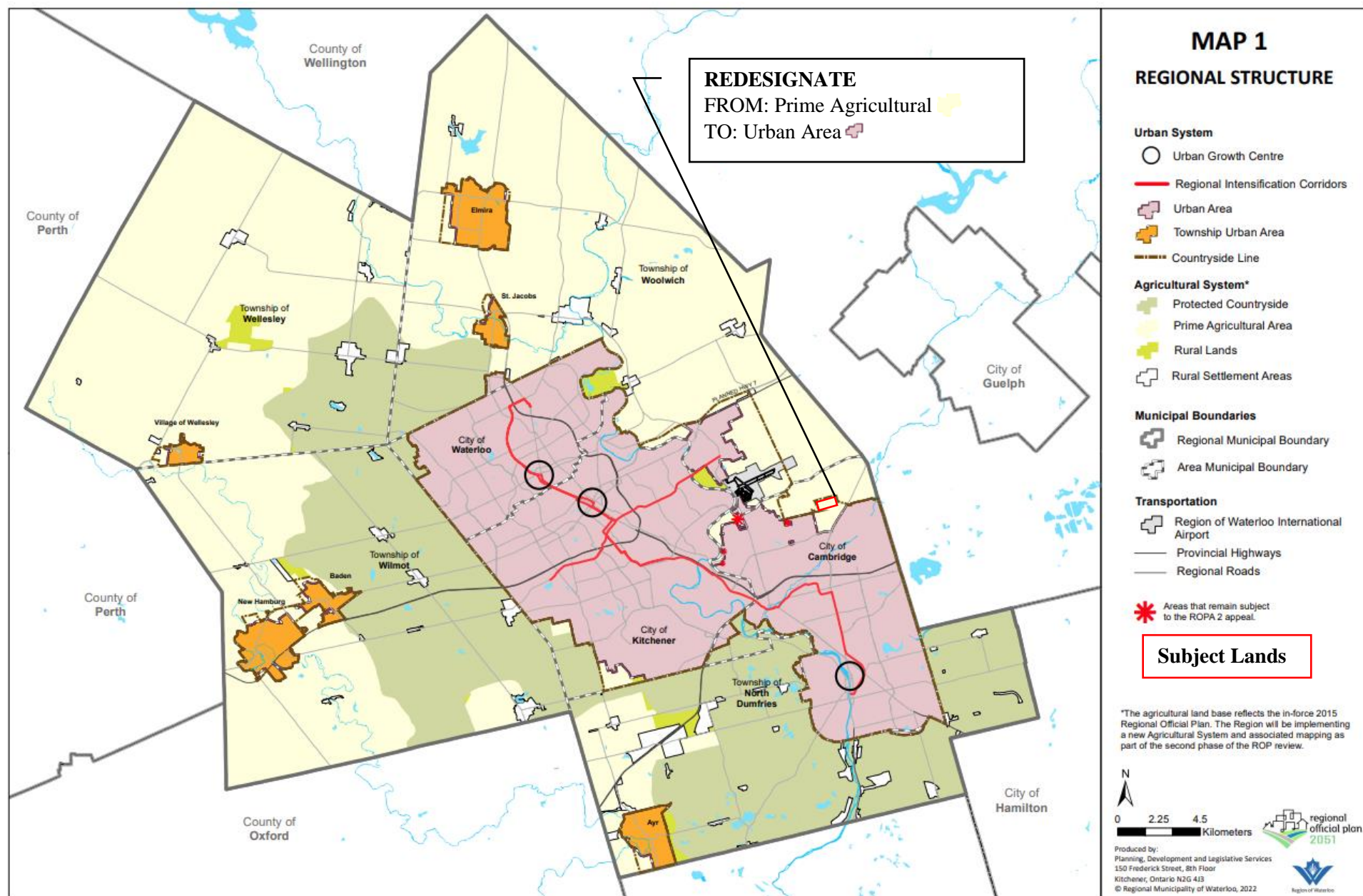
June 10 2021 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan (ROP) Review

<https://calendar.regionofwaterloo.ca/council/Detail/2021-06-10-1800-Public-Input-Meeting-Regional-Official-Plan-ROP-Re/33b1cf46-3a5a-49eb-ab1c-ad5c0109e48c>

June 29, 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan

<https://calendar.regionofwaterloo.ca/council/Detail/2022-06-29-1300-Planning-and-Works-Public-Input-Regional-Official-/191d6506-27fe-4067-94a4-aec20135e76e>

Appendix A – Redesignation of Subject Lands from Prime Agricultural to Urban Area in the Region of Waterloo ROPA 6



**Appendix B – Redesignation of Subject Lands from Prime Agricultural to Urban Area in the Region of Waterloo ROPA 6 – Map 1
(Regional Structure) [ZOOMED IN]**

