

January 2nd, 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

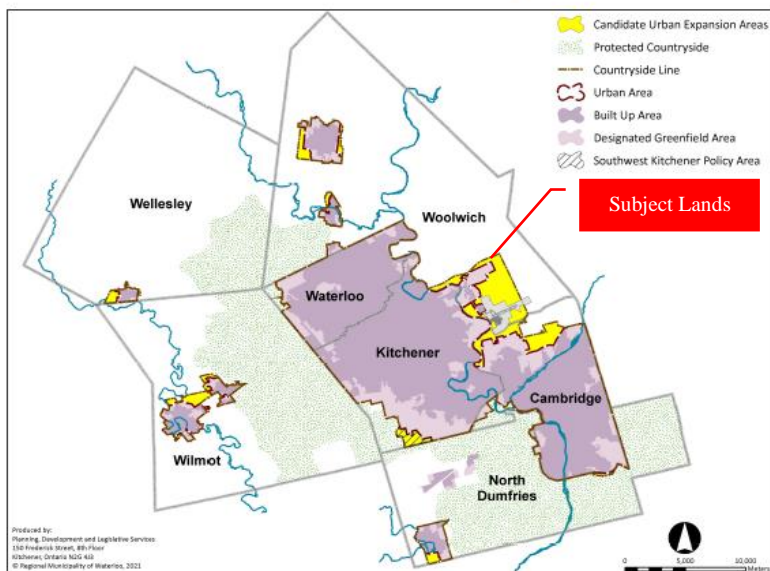
We are writing with respect to the Region of Waterloo's Official Plan Amendment 6 (ROPA 6) which was adopted by Regional Council in August 2022 and forwarded to the Minister for approval. We are the applicant for the lands known as PART LOT 106 GERMAN COMPANY TRACT TWP OF WATERLOO EXCEPT PART 1, 58R20837; PART LOT 1 SMALL LOTS S OF HORNING'S TRACT WOOLWICH PTS 1 & 3 58R2999 SAVE & EXCEPT PT 1 ON 58R18299 AND PT 1 ON EX PL WR841638 TOWNSHIP OF WOOLWICH in Breslau located in the Township of Woolwich (the "Subject Lands").

The Subject Lands are regular in shape and encompass 28.98 hectares of developable land. The Subject Lands have the potential to bring on in excess of 800 to 1200 new attainable housing options to the Region of Waterloo and Township of Woolwich 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. **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 Breslau 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:**

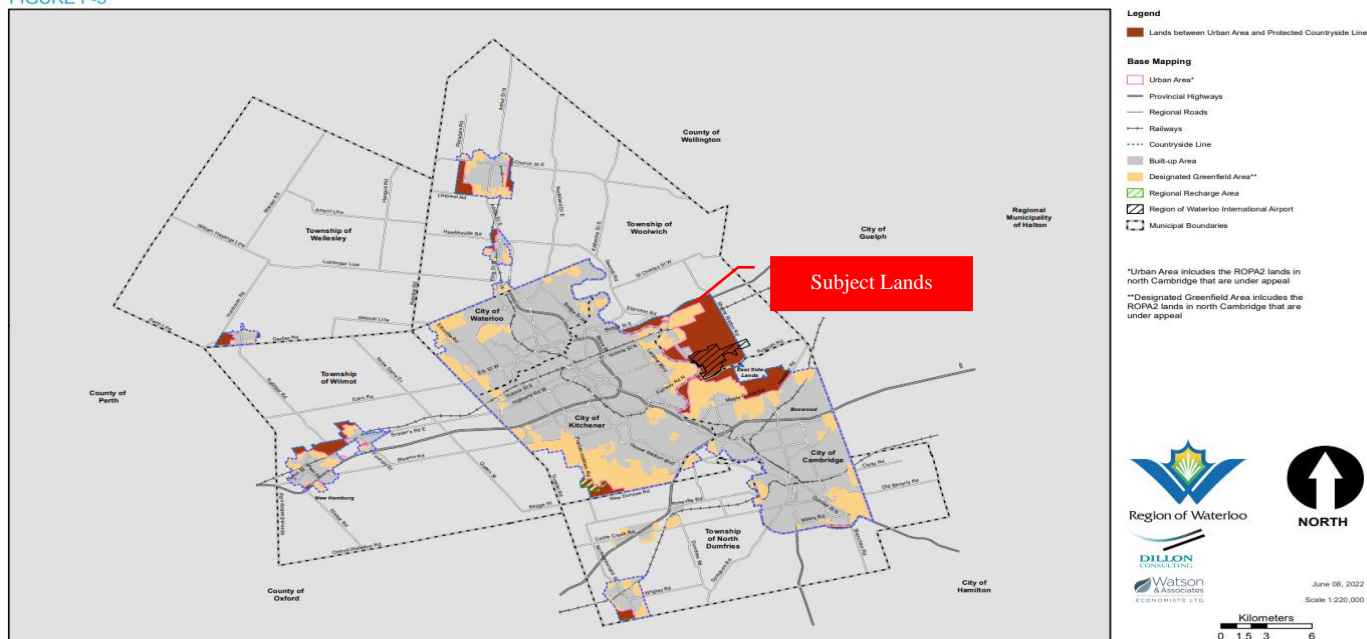
Candidate Urban Expansion Areas



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:

LANDS BETWEEN URBAN AREA AND PROTECTED COUNTRYSIDE LINE FIGURE F-3



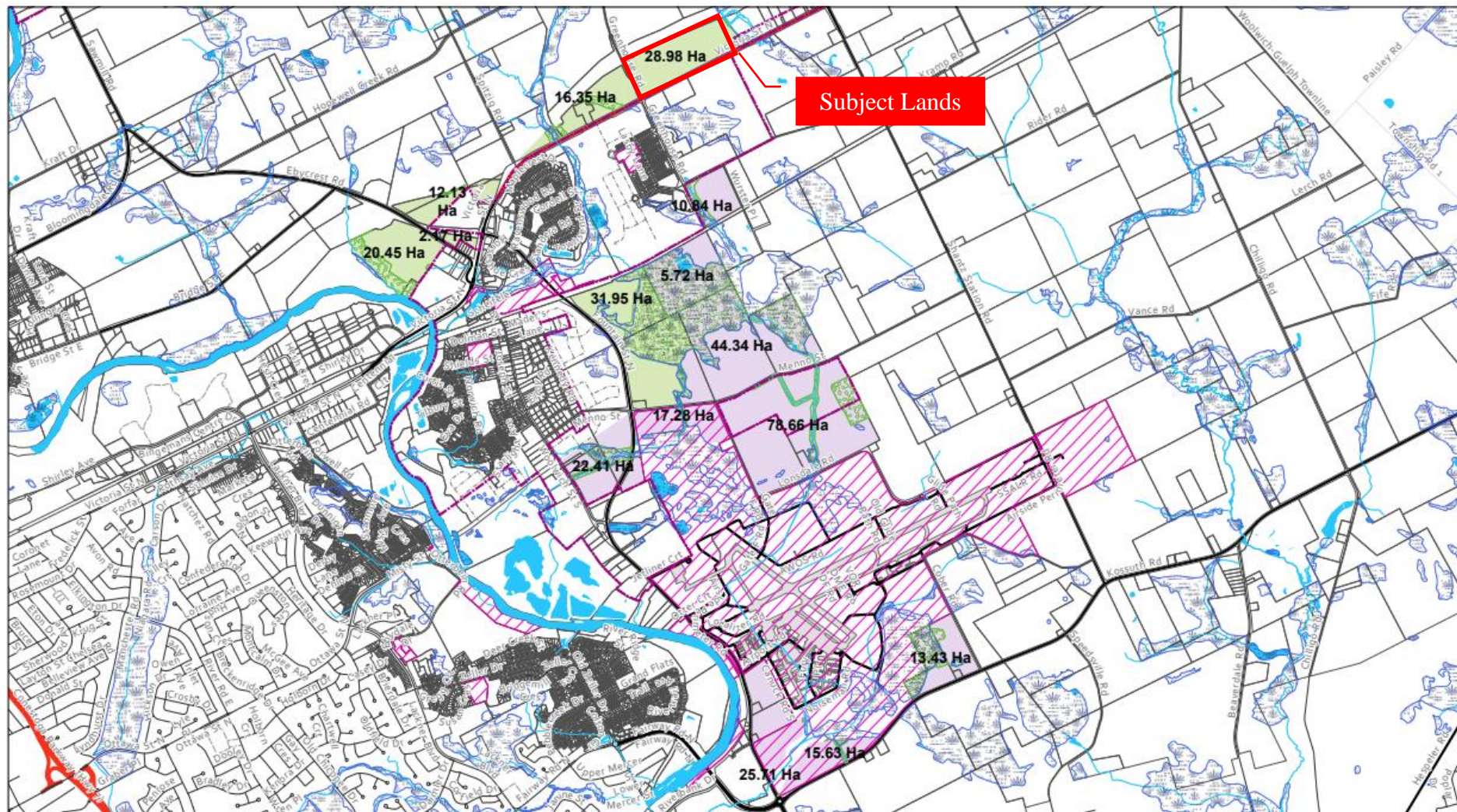
Extracted from June 29, 2022 Regional Municipality of Waterloo Planning and Works Public Input Meeting: Regional Official Plan. Region of Waterloo Land Needs Assessment Addendum.

In the Township of Woolwich staff report, *Regional Official Plan Comments, Lands Needs Assessment and Preliminary Boundary Adjustment*, as presented at the June 6, 2022 Township of Woolwich Council Meeting, Township staff identified the Region's LNA Option 2 as its preferred option for growth. In supporting this preferred option, Township staff also identified which lands should accommodate the 176 hectares of new Community Land and 306 hectares of new Employment Land required under Option 2 for the Township. Township staff relied on the following criteria to identify the recommended lands:

- Are the lands within the Countryside Line/Previously supported
- Logical expansion to the settlement
- Servicing availability
- Provides/supports key transportation connections
- Appropriate land use
- Appropriate Township housing mix
- Rural Settlement – minor rounding

In completing their analysis, **Township staff identified the Subject Lands as proposed community expansion lands in Breslau as shown in the map below:**

Proposed Community and Employment Lands: Breslau



Legend

- | | | | |
|------------------------|-----------------------|---------|------------------------|
| Settlement Boundary | Creek/Stream | Airport | Expansion Lands |
| Environmental Features | Waterbody | | Community |
| Wetlands | Waterloo Region Lands | | Employment |

0 2,000 Meters

Scale: 1:30,000



Extracted from June 6, 2022 Township of Woolwich Council Meeting; Regional Official Plan Comments, Lands Needs Assessment and Preliminary Boundary Adjustments

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

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 the Township of Woolwich until 2051 under each growth scenario:

Growth Scenario	Growth Scenario Description per the Region's LNA	Township of Woolwich Community Area Land Need
Option 1	Growth Plan Minimum	416 Hectares
Option 2	Compact Development, Modest Community Area Expansion	176 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	52 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. “

Township staff similarly supported Option 2 as the preferred growth scenario for the Township of Woolwich at the June 6th Township Council Meeting. After considering the 52 hectares of community area land expansion approved through ROPA 6 for the Township, there remains a community area land expansion requirement of an additional 124 hectares under the Option 2 growth scenario for the Township. The Subject Lands are 28.98 hectares, have been identified by Township staff as recommended community expansion lands, and could easily be accommodated within the additional 124 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 Breslau. Specifically:

Wastewater

Wastewater generated in Breslau is diverted to the Kitchener WWTP. There is existing plant capacity for 200,644 people at the Kitchener WWTP. Under the highest population growth option for Kitchener of 148,300 people, the remaining plant capacity at the Kitchener WWTP would be over 52,300 people. Given the highest population growth option to the Township of Woolwich is 29,000, of which Breslau would likely not accommodate all of this growth due to existing plant capacity of 11,554 people at the Elmira WWTP, there would be adequate remaining plant capacity at the Kitchener WWTP of up to 52,300 people to accommodate additional growth in Breslau.

Water

Breslau 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 Township of Woolwich until 2051.

Conclusion

The Subject Lands will support completing the existing community of Breslau; bring on much needed new housing options to the Region of Waterloo and Township of Woolwich; and will support the Province in meeting its housing objective of 1.5 million new homes in the next 10 years. The Subject Lands are located within the Countryside Line, have available existing and planned water and wastewater infrastructure and have been identified both by the Township and Region as candidate community expansion lands to accommodate future population growth in Breslau. 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>

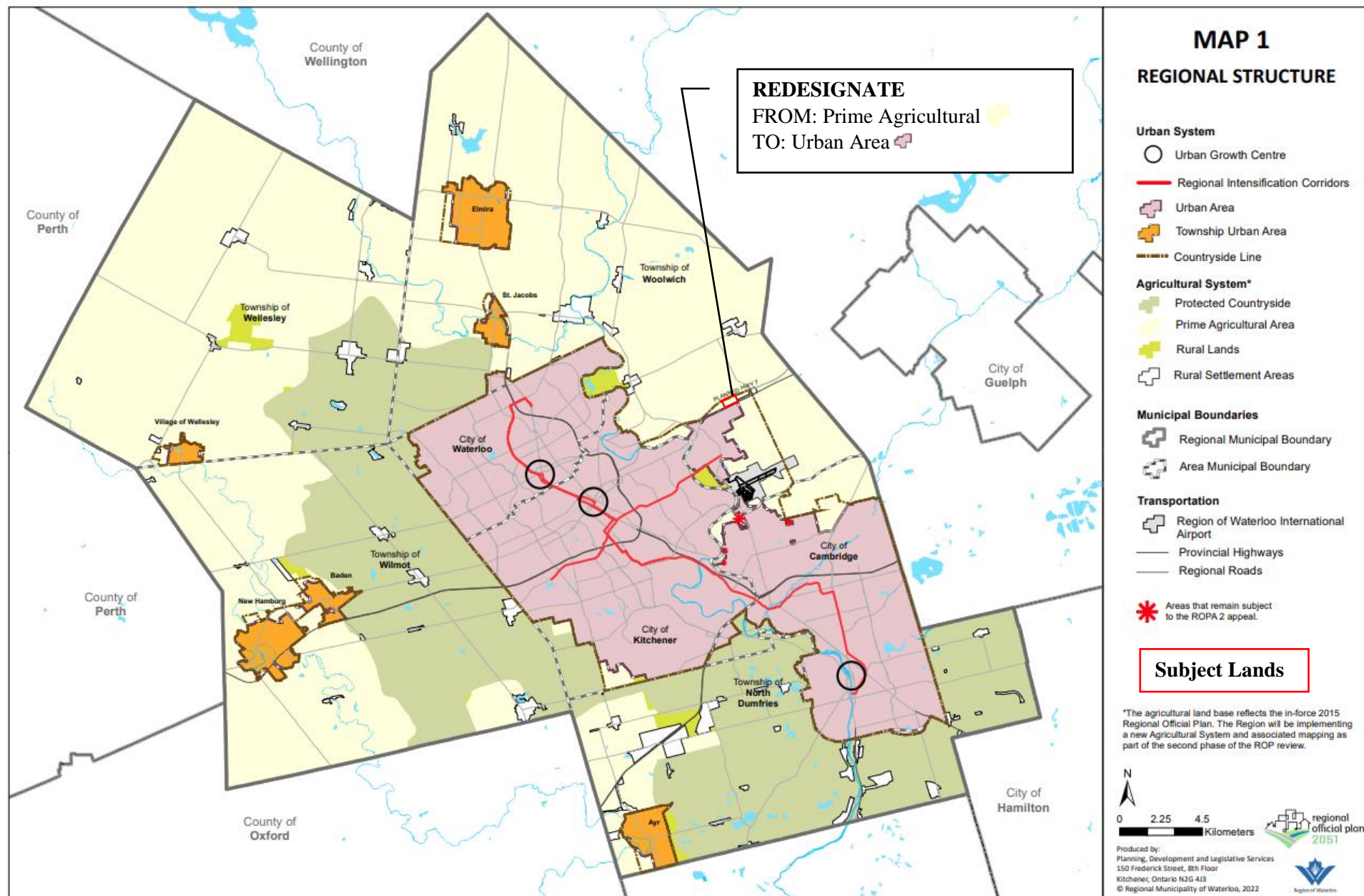
June 6, 2022 Township of Woolwich Council Meeting

<https://calendar.woolwich.ca/council/Detail/2022-06-06-1900-Council-Meeting2/41d751be-74ee-4ea7-8dab-aeaf00e81609>

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]**

