

January 2nd, 2023

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

Submitted Online

Dear Minister Clarke;

RE: 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 owners of a total of 43.6 hectares of lands in the Township of Wilmot, and ROPA 6 included 31.6 ha of that total into the Region's Urban Boundary as follows: 15 ha for the purpose of employment uses and 16.6 hectares for residential and community uses. These lands are shown on the attached map as Parcel A. The remaining 12 hectares of our lands, as shown on the attached map as Parcel B, were not included in the Urban Boundary.

It is our submission that the remaining 12 hectares of land be included in the Region of Waterloo's Township 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.

By way of background, we have been active participants throughout the ROPA 6 process, and during the course of this process we prepared the following reports by duly qualified independent consultants, which demonstrated that there was a need for an urban boundary expansion, and there was justification for the inclusion of the totality of our lands as part of that urban boundary expansion. Those reports included:

1. Land Needs Assessment by Parcel Economics;
2. Planning Justification Report by Bousfields;
3. Technical Engineering Servicing Memo by Walter Freddy Engineering; and
4. Archaeological Assessment by Amick Consultants

In a staff report dated May 30th 2022, staff made the following recommendation to Wilmot Township:

THAT Report DS 2022-013 be received for information; and further,
THAT Council advise the Region of Waterloo of the following: That Wilmot Township requests all scenarios for growth to 2051 for Wilmot Township be modified as necessary to plan for the full utilization of the unallocated capacity of the New Hamburg Wastewater Treatment Plant (NHWWTP) – estimated by the Region in May of 2021 to be 10,400 persons;
That Wilmot Township requests that all scenarios for growth to 2051 for Wilmot Township utilize the existing Wilmot intensification target of 30% - recognizing that this target is both significantly greater than the historical rate of intensification for Wilmot Township and the intensification rate being proposed for other rural Townships; and,

That Wilmot Township requests consideration of increased minimum density requirements for developments, within any required expansions to Township Urban Areas, to further minimize the size of required expansions.

As noted above, this staff report makes it a priority the need to plan for the full utilization of the unallocated capacity of the New Hamburg Wastewater Treatment Plant (NHWWTP). Staff's position is entirely consistent with the Provincial Growth Plan and the Provincial Policy Statement, both of which require the utilization of existing infrastructure in order to optimize the long-term viability of public investments in infrastructure. It is on this basis that we make our request to include the remaining 12 hectares of our land into the Urban Boundary.

It is our further submission that including our additional 12 hectares of land shown as Parcel B on the attached map, ensures logical boundaries which would allow the 16.6 hectares of land which was included in ROPA 6 together with the additional 12 hectares we are seeking to be included, to be developed as a single contiguous parcel into a complete community, which together with community uses would accommodate over 2,000 new people within approximately 1000 new residential units. These lands would be developed utilizing existing available capacity within the New Hamburg Wastewater Treatment Plant (NHWWTP) as contemplated by the staff recommendation referenced above. In fact, it is our submissions then even after including these additional 12 hectares, there would still remain excess capacity within the NHWWTP.

In addition, it is important to note that the additional 12 hectares of our land are within the Countryside Line, and are unencumbered by any development constraints.

These lands represent one of the few opportunities in the Region of Waterloo to bring forward a complete community immediately. However, to make this a reality, we are required to make significant financial commitments to extend certain pieces of infrastructure to our lands. By including these additional 12 hectares, we will be able to make these financial commitments and begin retailing new homes to the community as early as 2024.

We would be pleased to discuss this further with you at your convenience or provide you with copies of any of the above-mentioned reports should you wish them.

Sincerely,



Ramsey Shaheen, President
Cachet Homes

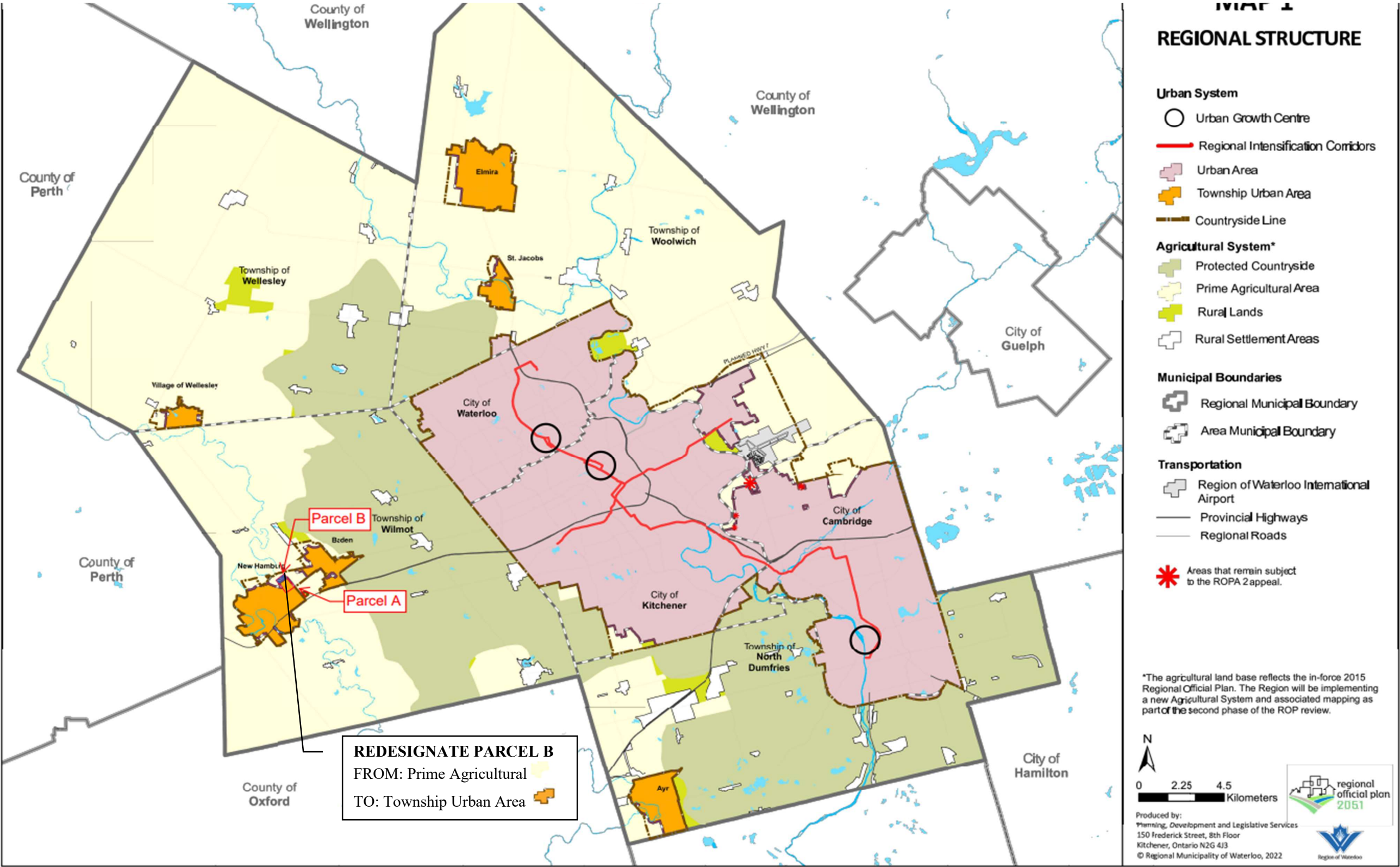
Cc: Hannah Evans, Assistant Deputy Minister

Links:

May 30 2022 Township of Wilmot Council Meeting: Region of Waterloo Official Plan Review – Lands Needs Assessment

<https://calendar.wilmot.ca/council/Detail/2022-05-30-1900-Council-Meeting2/e180a18e-fa83-4a58-a21f-aea1010b187f>

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



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

