

November 15, 2023

Mayor Shantz and Woolwich Council
24 Church Street West
P.O. Box 158
Elmira, Ontario N3B 2Z6

**Re: Region of Waterloo Official Plan Review Amendment No. 6 – Inclusion of 2450
Victoria Street North, Breslau**

Mayor Shantz,

On November 2, 2023, the Hon. Paul Calandra, Minister of Municipal Affairs and Housing, sent a letter to municipalities regarding the Ministry's intent to reverse changes made by the Province through its approval of various Official Plans and Official Plan Amendments. The proposed reversal would bring these Official Plans and Official Plan Amendments into effect "as adopted by municipal council without provincial modifications." However, Minister Calandra's letter also asks municipalities "to submit information about the modifications to the official plans that were originally submitted to the Ministry," including "changes that the municipality would like to see made to the official plan, based on the modifications that the province had previously made, and which you support."

The approved Official Plans and Official Plan Amendments affected by this reversal include Amendment No. 6 to the Region of Waterloo Official Plan ("ROPA 6"), which the Region adopted on August 18, 2022, and which the Ministry approved with modifications on April 11, 2023. Among those modifications were changes to the extent of the Breslau Urban Area, which was expanded beyond what had been adopted by Regional Council. We respectfully ask the Township of Woolwich to support the April 11, 2023, modification and to express that support to Minister Calandra. There is a severe shortage of family based housing in the Region. In this context, we respectively have two requests:

Request 1: The inclusion of a portion of 2450 Victoria Street North

Request 2: The continuation of the Breslau Secondary Plan with the April 11, 2023 boundaries

Request 1:

Site Context

As mentioned above, the Site is a 15.3 hectare (37.8 acre) parcel on Part of Lot 107 north of Victoria Street North (Highway 7) and has approximately 640m of frontage. The northerly limit of the Site is adjacent to the Planned Highway 7 right-of-way. Surrounding lands include a mixed-use subdivision (Hopewell Crossing) to the south across Victoria Street North (Highway 7), which is also owned by Thomasfield Homes. Lands to the north, east and west are agricultural. The Site also encompasses a farm property with frontage on Victoria Street North (Highway 7). This property would likely also need to be incorporated into the settlement area boundary if the Site was to be included into the Settlement Area. **Refer to attachment 1.**

Thomasfield originally proposed that these lands be incorporated into the settlement area as part of the Township of Woolwich Rationalization process in 2018. The Township had no objection to the rationalization request provided the adjacent lands were also added (2450 Victoria Street North). There was not enough land to be swapped through the rationalization process to include these lands within the Settlement Area boundary. Thomasfield made submissions to the Township during the rationalization process requesting that these lands be considered for addition to the Breslau Settlement Area during the next boundary review process.

Additionally, the Subject Land as being designated “Residential”, which aligns with the position expressed in Township Staff Report DS23-2022. This Staff Report, presented at the Council meeting on June 6, 2022, provides Township Staff’s recommendations regarding the Regional Official Plan Review Process (a process that would culminate in the adoption of ROPA 6). Report DS23-2022 recommends that the Subject Land be included within the Breslau Urban Area, indicating that the Subject Land provides for the logical extension of services.

Inclusion Request

The Site is strategically located between the Planned Highway 7 and a future Regional Road (current Highway 7) and is contiguous to the existing Urban Area, more specifically described as the Breslau Settlement Area. Thomasfield has made major investments in the development of servicing infrastructure to support growth of the Breslau Settlement Area through the development of the Hopewell Crossing Subdivision. The inclusion of this Site into the Urban Area would allow for more development in Breslau, which would help in making efficient use of this new infrastructure. We respectfully request that this Site be considered in the expansion of the Breslau Settlement Area to accommodate its future growth.

Request 2:

We request that the Township continues the Secondary Plan as is, based off the April 11, 2023 Ministerial decision. While the Ministers decision of April 11, 2023 was bold, it did recognize the extreme housing needs required within the Region and Province. As you know, the Township has initiated the process of updating the Secondary Plan for the Breslau Urban Area, based on the expanded Urban Area boundaries in ROPA 6, as modified by the Province. According to the “Breslau Secondary Plan Update” page on EngageWR.ca, the purpose of this update is to review the Breslau Secondary Plan’s vision, guiding principles, planning policies, and mapping to ensure conformity with the changes introduced by ROPA 6, as approved. Public consultation for the Breslau Secondary Plan Update project has included an open house hosted by the Township on June 22, 2023, at which community members were presented with the expanded Urban Area limits and were invited to comment on potential land use concepts for the updated Secondary Plan. The Township has already dedicated significant time and resources to the process of updating the Breslau Secondary Plan, much of which would be rendered obsolete should the boundaries of the Breslau Urban Area revert to what they were in ROPA 6 as adopted by Regional Council.

Smart Prosperity Institute 2021 released a new report regarding Housing Needs: In the Region of Waterloo from 2021 to 2031. In this report, 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.

Our concern is that the endorsed growth option by Regional Council did not reflect the actual housing needs for the Region of Waterloo and would negatively affect the ability to provide an appropriate range and type of housing. It is noted that various professionals/experts have provided information and delegations to Regional Council and Regional staff identifying concerns with the methodology and implementation of the Land Needs Assessment.

The subsequent options presented at the Secondary Plan public meeting showed leadership and a bold, yet necessary plan, which would accommodate the Regions needs and growth over the next 30 years. Our preference for the Secondary Plan was Option 2, which is attached as **attachment 2**. We believe Option 2 shows the best qualities of what the market needs and good planning practices. It provides the necessary lands for growth for Breslau, with residential along the Victoria Street/Hwy 7 corridor and employment surrounding the residential incompatible airport and Conestoga Meats manufacturing plant.

The Secondary Plan's Option 2 shows our Bisgould Property which is located north east corner of Greenhouse Road and Kramp Road, it is currently draft plan approved for Employment but the Option 2 preliminary concept for the Bisgould lands identifies Low/ Medium density on the majority of the Site, with Mixed Use blocks and medium density residential uses along Highway 7, and high-density housing behind the mixed use/medium density blocks. We believe this concept provides for a wide range of housing while addressing the area's commercial needs in the mixed use blocks. We were encouraged to see a large portion of the Site be low density residential as this tends to be a desirable built form for the area, and Mixed Use along Highway 7. We would like to see this continue.

In terms of timing, even if all of this land was included it would take decades to come to fruition, due to infrastructure, processing, construction constraints. It generally takes 10+ years to bring a development from first submission to building permit. For reference our successfully Hopewell Crossing development, received complete application in 2011 and only received building permits in late 2018.

Conclusion

This additional land is greatly needed. We are in the middle of a generational supply challenge and this is reflected in the sky-high prices of 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. Approved land is taking way too long from draft plan approval to building permits.

The Official Plan walk back will have an impact on the Region for the next 30 years. We have to consider the silent majority, those who want to raise their children in ground-related dwellings. We have to consider the citizens who haven'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.

For all of the reasons outlined above — not least of which is the considerable time and resources that the Township has already dedicated to updating the Breslau Secondary Plan — we respectfully submit that maintaining the Province's modifications April 11, 2023 to ROPA 6 is in the best interests of the Township and its residents. Minister Calandra's letter notes in particular that "lower-tier municipal feedback on the original official plan submitted to the province will be important to supporting its implementation." We therefore ask that the Township of Woolwich express its support for the modifications made by the Province through its approval of ROPA 6.

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,



Tom McLaughlin

VP Finance Thomasfield Homes

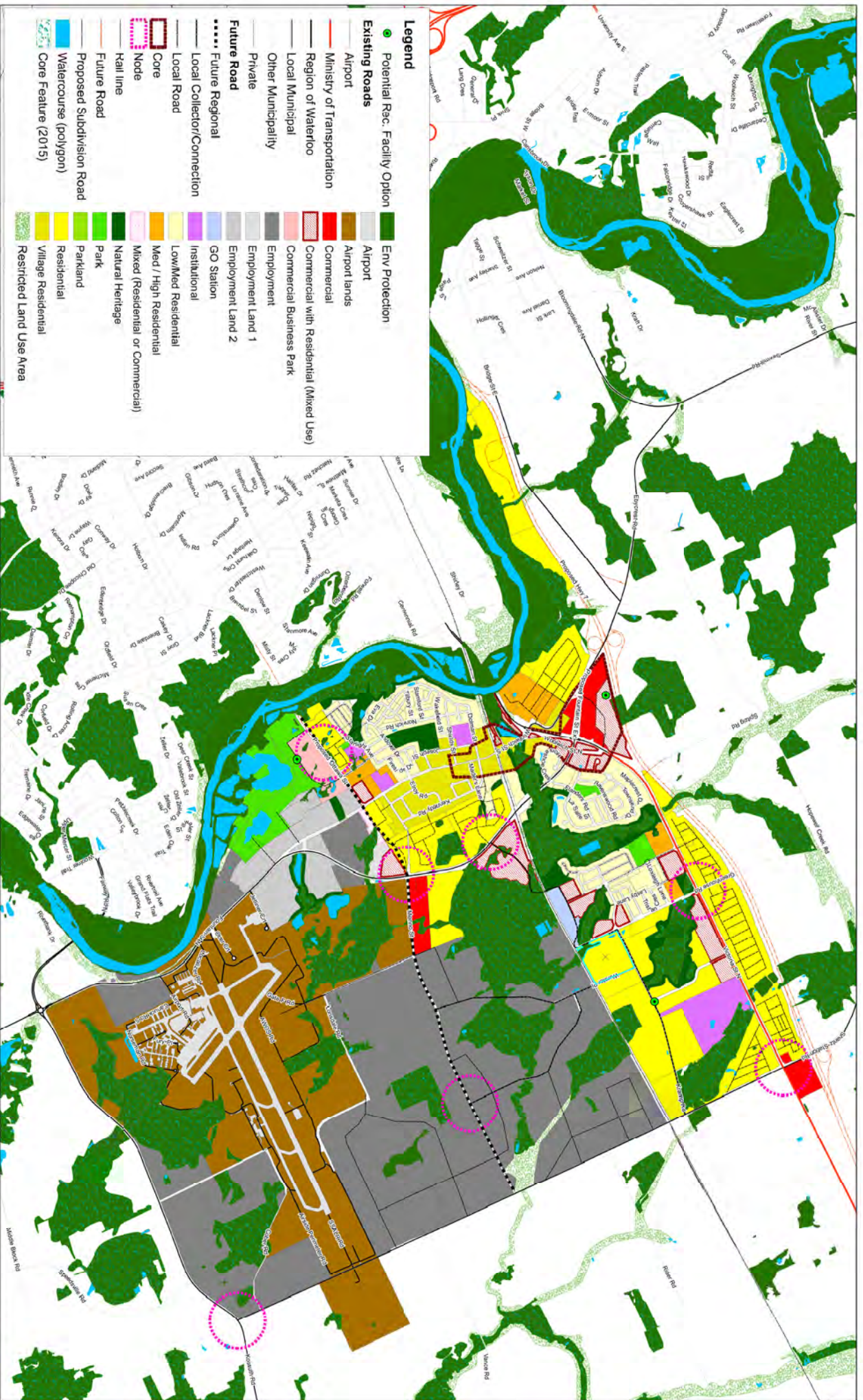
cc. Hugh Handy – GSP Group

Thomasfield Homes
LOCATION MAP
2450 Victoria Street North, Breslau



Scale 1:2500
May 26, 2022
Project No.: 16004
Drawn By: SL





Concept 2 - Residential Focus