



**Hold The Line Waterloo Region**  
300 Mill Street  
Kitchener, Ontario N2M 5G8  
*Traditional territory of the Chonnonton,  
Anishinaabe, and Haudenosaunee*

**Comments regarding Notice of Motion 15.1  
(Response to Bill 23 and reversal of Provincial changes to Official Plans)**

November 19, 2023

Region of Waterloo Council  
150 Frederick St.  
Kitchener, Ontario N2G 4J3

Dear Chair Redman and members of Council,

Hold The Line Waterloo Region exists because we value a regional approach to planning. We have seen how it protects our common resources like groundwater, natural areas, and farmland, which provide collective benefits to us all. Our members have championed the Region's population targets and transit-oriented growth policies. Our community has consistently proven that we can build lots of housing in vibrant, diverse communities that don't have to sprawl into the countryside.

We would like to address some of the claims in Notice of Motion 15.1, presented by Councillor Salonen. The motion is premature, and mischaracterizes the role of the Region in planning for growth.

The motion states, "*Bill 23 once proclaimed by the Lieutenant Governor will make the Region of Waterloo an upper-tier municipality without planning responsibilities*". There is no guarantee that this will happen, and it would be premature for Regional Council to approve any motion that presumes to know how future Provincial regulations will be enacted. This Provincial government has made a series of rushed decisions regarding land use planning that have been subsequently reversed or stalled:

- In 2018, the Region of Waterloo and all area municipalities joined other communities across Ontario in opposing parts of Bill 66, which would have carved out exemptions to the Planning Act and removed requirements for public consultation. The Province cancelled their proposed changes after massive pushback from councils and residents.
- In 2019, the Province hired Ken Seiling and Michael Fenn as special advisers to recommend changes to regional governance in Waterloo Region. The report was shelved, and the Provincial government did not act on its recommendations.
- In 2022, the Province announced it would appoint a facilitator to review governance in Waterloo Region. The deadline to appoint facilitators was September 11, 2023. When no facilitators had been appointed, that deadline was extended. Then the Minister proposed

handing over the review to a legislative committee, which the Minister admits is “already tasked with a significant workload.”

- In 2022, the Province announced it would remove 2994 hectares in 15 different areas of the Greenbelt. By September 2023, that decision was reversed.
- In 2023, the Province proposed significant changes to the Provincial Policy Statement, including allowing farmland to be split up into residential lots, even outside of a designated settlement area. By June 2023, the Minister reversed course, saying that farm severances were off the table.
- In April 2023, the Province announced forced urban boundary expansions in Waterloo Region and other communities with no right of appeal. By October 2023, the Minister made an announcement winding back those changes.

These examples show that this Provincial government offers no certainty that they will follow through on their intentions for land-use planning. As long as the Region of Waterloo retains its planning authority (which, as of today, it does), it should continue to exercise that authority. We have a strong history of working together in Waterloo Region, and we should not replace that approach with 7 different uncoordinated city and township plans.

Sincerely,

Sean Campbell

Sam Nabi

Alex Szaflarska

*Directors, Hold The Line Waterloo Region*