

ATTACHMENT NO. 2

The following are general comments/questions and requested changes which forms Woolwich Township's formal response to the Region's proposed Official Plan Amendment

15 Minute -Walk Community

The 15-minute community relies on providing the basic day-to-day services of a community within a distance for cycling, walking or rolling. Where those necessary services for daily-living cannot be provided in the area, one can access them "by taking direct, frequent and convenient transit". Although Woolwich has some level of transit in Elmira, St. Jacobs and the Stockyards Area, it may not necessary be what is described as "direct, frequent and convenient". In addition, the Breslau area currently does not have any permanent transit. The definition also speaks to "compact" and "well connected places" which again is not clear and not usually a term used to refer to the Township Urban Area (TUA) but is more of a term used associated with a city urban area, especially within a city centre. In connection with the term "daily living", it would also suggest that a food store, pharmacy, doctor's office or even a clinic should be available to the general public which again may not necessarily be provided in all areas of a Township community. As such, the Region may want to revise the policies to be more generic which can be applied to both the Urban and TUA or consider separate connected community policies geared towards TUA.

It should be noted that currently, Breslau and the Stockyards Area would not be 15-minute neighbourhoods at this time. Although Breslau hopefully will be such a community in the fullness of time. There are currently no plans for the Stockyards Area to have a residential component or be a 15-minute community. How will Stockyards Area conform to these policies (or do they apply) and will these policies preclude the Region from substantially approving the vision of Woolwich Council as implemented in OPA #38.

Each of these items tie back to a few basic concepts that need to be considered.

- That to have a true 15-minute neighbourhood, it requires more substantial commercial than just basic convenience store and if such uses are spread around throughout the community it may impact the viability of the downtowns.
- It relies on commercial/retail stores and businesses willing to locate in various smaller units internal to a neighbourhood. This is generally not the case as it has been our experience that in many cases they are more likely to build larger stores in key accessible and visible areas along primary roads. Planning can zone and permit the uses, but the Township cannot force them into these areas unless they see a market advantage for the business.
- In addition to commercial; schools, health care, recreational facilities etc., would also need to be provided. Are the School Boards going to acquire sites for small neighbourhood schools? Municipalities struggle to find doctors so is it achievable to provide basic health care needs within a neighbourhood and community level with

not just a doctor's office but also a clinic etc.? What level of service is anticipated with regard to recreational needs to meet at 15-minute community?

It seems the definition and many policies may not be appropriate in all areas of the Region which has many types and sizes of communities as opposed to one, harmonious city urban area . This is reflected in the definition and following examples in Chapter 2.

- Page 2, 1st bullet – “where other needs can be met by taking direct, frequent and convenient transit”. Such transit does not exist in the Township, and this would conflict with the 15-minute neighbourhood concept proposed in bullet 1.
- 2.D.6 a) - plan requires the creation of a “multimodal street pattern”. What does this term mean? Is a local two-lane road with sidewalks on both sides “multimodal”? Is a local side street that would require cars and cycling to share the travelled road be an acceptable multi-modal corridor? Please confirm.

Generally, the Township can encourage such development to support a 15-minute community, but it needs to be accepted that the Township may not be able to achieve the full outcome throughout all of their urban communities. Alternatively, Regional staff may want to consider adapting the 15-minute community policies to what may work and be appropriate for the TUA.

Regional Intensification Corridors

The draft urban system on Map 2 illustrates a Regional Intensification Corridor along the Ottawa Street extension entering into Woolwich to potentially connect the ION transit system to the Waterloo Region International Airport. This Corridor links higher density mixed-use developments with transit infrastructure. As you are aware, the Township is processing two planning applications along this proposed Intensification Corridor being the Empire development (between the Grand River and Woolwich Street) and the Madison Homes' development (between Woolwich Street and Fountain Street). What are the Regional implications of this proposed Corridor designation in your review and comments on these two applications?

Commercial Policies

The draft policies are primarily silent on the role of commercial in the Region's urban system. There are a few commercial policies that references (1) commercial as part of the 15-minutes community, (2) ensuring retail is directed in walkable/transit areas and (3) prohibiting major retail in Regional Employment Areas. However, the draft policies do not speak to the role of commercial and retail will have region-wide in developing complete and walkable communities. Is it the expectation of the Region that the area municipalities will address this issue in their own, individual way based on satisfying local needs? If so, how are regional shopping issues being considered? Township Staff believe that 'brick and mortar' commercial is an essential component in the community fabric with the development of local shopping centres within neighbourhoods and promoting vibrant core areas/downtowns within larger urban areas. However, the 'brick and mortar' businesses are eroding as retail is trending towards on-line shopping which relies heavily on delivery truck traffic through the community and neighbourhoods. With significant emphasis in the draft policies to provide 15-minute communities with less dependence on the automobile

to address climate change, will these potential gains be somewhat offset by the on-line shopping trend that promotes significant delivery traffic in our communities as well as the lack of policy direction in the ROP to encourage the development of 'brick and mortar' commercial in strategic areas?

Specific Comments/Suggested Revisions

Chapter 1

- Section 1.1, paragraph 1 – does not acknowledge the vast and productive rural area that forms part of this region.
- Section 1.1, paragraph 5 – in addition to food production, the on-farm businesses and activities is a significant component of the region's agriculture sector to contribute to the strength of the regional economy.
- Section 1.2.1, paragraph 1 – should housing be included in the list factors of ensuring an equitable community?
- Section 1.2.1, paragraph 4 – the reference to "missing middle" should be accompanied with a brief description. I realize the draft ROP was accompanied with a Glossary with a couple of definitions for the 'missing middle', but the reader may not know what the 'missing middle' means in this context.
- Section 1.2.2, paragraph 1 – the plan promotes a 'compact' building form to make better use of land and infrastructure, but I am not sure whether a 'compact' form, in this context, makes it a more vibrant community.
- Section 1.2.2, paragraph 2 – TUA should be included with the "Region's three Urban Centres, and smaller towns and villages. Elmira and St. Jacobs are not considered as a smaller town and village.
- Section 1.2.2, paragraph 3 – the Region should maintain an employment land base in strategic and diverse locations, which promotes having sufficient employment lands that is spread throughout the region to meet the needs of a broad range of sectors who target certain areas of the region.
- Section 1.2.3, paragraph 1 – add reference to "protecting" the natural environment.
- Section 1.2.3, paragraph 2 – acknowledge that the encouragement of "on-farm business activity" help supports the farming operation.
- Section 1.5.5, paragraph 1 – clarify that the Growth Plan was modified in 2020 with Amendment No. 1.
- Section 1.5.5, paragraph 1, 8th bullet – also indicate to provide sufficient new employment lands to meet the employment needs to 2051.
- Section 1.7.1, paragraph 1, 4th bullet – TUAs also have their own Growth Centres with higher densities to accommodate some of the regional growth.
- Section 1.7.1, paragraph 4 – acknowledge that the rural settlement also offers a different form of living environment as not everyone in the region wants to live in a dense urban or township urban area. In addition, the rural settlement can expect a very modest level of growth within their existing settlement limits.
- Section 1.7.4, paragraph 1 – "future urban to be within the Countryside Line" should be qualified as the Region may consider expansion outside the Countryside Line as per Policy 2.C.1.2.

Chapter 2

- Section 2 Preamble – consider issues raised in the General Comments on climate change related to the role of commercial.
- Section 2 Objective, 1st bullet – qualify that it is the intent of the Plan to have a greater portion of the people living in a 15-minute community. It may not be realistic or possible to have everyone live in such a community.
- Section 2 Objective, 2nd bullet – does promoting “intensification as the first approach” give justification for a higher intensification rate, advocated by some, that may not be appropriate in all communities within the region? In addition, the Region needs to look at the Townships individually in determining appropriate intensification targets.
- Section 2.A, paragraph 1 – should the Plan acknowledge the 2019 base population and employment to give clarity on what needs to be achieved to meet their respective targets in 2051?
- Section 2A.1 – acknowledge that the area municipalities will include their respective population and employment allocations in Table 1 in their own official plans to implement the Region's overall average target.
- Section 2.B, paragraph 6 – the reference to “most” as it relates to directing growth to the Built-Up Area is misleading and could justify a higher intensification target since the projected target in Options #2 and #3 is a 60%- 40% split between Built-Up Area and Designated Greenfield Area.
- Section 2B.1.2 – add “plans of condominium” in addition to subdivision and site plan approvals.
- Section 2B.1.2(b) – who and what level of expertise is required to review and approve an Energy Modelling Report. Does such requirement apply across the board, and will it hinder those that want to provide affordable housing because such requirement could inflate their cost and timing of development?
- Section 2.C.2.2 (b) (i) – add the reference to “transit” as part of the modal shift.
- Section 2.C.2.2 (e) – in absence of the special policy, residential can be considered in the Stockyards Area (see General Comments).
- Section 2.C.3.2 – will this requirement of avoiding Prime Agricultural Areas be difficult to satisfy in Woolwich since the majority of the lands within the Countryside Line and adjacent to Elmira, St. Jacobs and Breslau are Prime?
- Section 2.D.3 – see General Comments on the proposed Regional Intensification Corridor for Ottawa Street. Is Victoria Street within Kitchener and leading into Breslau another candidate?
- Section 2.D.5.1 – this provision should qualify that the area municipalities will establish such policies to permit the missing middle housing in most residential zones since there may be certain residential zones that may not be appropriate for such housing.
- Section 2.D.6.1 (a) – is prioritizing walking, cycling and rolling over the *automobile* to high of a standard to meet. Can such features be incorporated in addition to the automobile to provide balance in creating this multimodal street pattern?
- Section 2.E Preamble – the paragraph should acknowledge that TUAs are also referred to as “settlements areas” (in addition to towns and villages), offers a different form of a living environment that cannot be provided in the cities and provides a wide range of hard and soft services and infrastructure.

- Section 2E Objectives, 2nd bullet – qualify that Woolwich’s may ultimately direct most of its growth to Breslau, which is an Urban Area.
- Section 2.E.2.1 - add reference “except if Section 2.C.1.2 applies” after “Countryside Line”.
- Section 2.F – should the Preamble explain that the intensification target is measured as a percentage of new growth within the planning period, such target is an average region-wide and each area municipality will be allocated their own appropriate intensification target implemented in their respective official plans to achieve the region’s average.
- Section 2.G Preamble, paragraph 1 - the reference to “most” as it relates to directing growth to the Built-Up Area is misleading and could be used to justify a higher intensification target since Options #2 and #3 is a 60%- 40% split between Built-Up Area and Designated Greenfield Area.
- Section 2.H – will the employment policies reference the proposed intensification target outlined in the LNA?
- Section 2.H.1.4 – see 3rd paragraph of General Comments as it relates to the Stockyards Area.
- Section 2.H.1.14 – see 3rd paragraph of General Comments as it relates to the Stockyards Area.
- Section 2.H.17 – consider adding two additional criteria (iii) providing a broad range of lot sizes for employment lands, and (iv) providing a sufficient supply of employment lands in strategic locations where there is a clustering of certain employment sectors.
- Section 2.J.4 and 2.J.5 – see General Comments.