



August 11, 2022

Planning and Works Committee
Region of Waterloo
150 Frederick Street
Kitchener, ON N2G 4J3

Dear Committee Members:

Re: *Item PDL-CPL-22-24*
Adoption of Proposed Amendment to the Regional Official Plan
Implementation of the Results of the Municipal Comprehensive Review
985-999 Bridge Street West, 730 King Street North and Part of Lot 5,
Reference Plan 58R-10258 Part 1, Township of Woolwich

We are the planning consultants to Cook Lands Group, who have taken a controlling interest in the former Conestoga-Rovers Associates (CRA) lands, comprising the 44-hectare property municipally known as 985-999 Bridge Street West and Part Lot 5, Reference Plan 58-R10258 Part 1 and 730 King Street North, in the Township of Woolwich (the “subject site”). The subject site is generally located on the north side of Bridge Street West, east of King Street North and Martin Grove Road, and is situated on the north side of the municipal boundary between the Township of Woolwich and the City of Waterloo.

We have participated throughout the Municipal Comprehensive Review process and have made numerous submissions to staff in support of the request to add the subject site to the Urban Area Boundary as a minor rounding out of the Northfield employment area, a Provincially Significant Employment Zone (“PSEZ”). As detailed in our submissions, the subject site represents an exceptional location for employment uses given its overall size and its direct adjacency to the existing Urban Area Boundary, a PSEZ and major highway infrastructure, among other factors.

We believe that increased land use flexibility, afforded through the site’s incorporation within the Urban Area Boundary, would facilitate a redevelopment that would complement the existing employment and commercial uses in the area. The site represents a logical location for Urban Area Boundary expansion and would help to accommodate the significant employment growth and land needs that are forecast for the Region between now and 2051. As such, it continues to be our opinion that the Urban Area Boundary should be expanded to include the subject site.

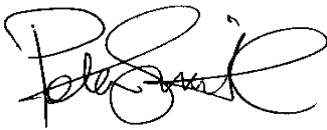
Throughout the process, the most significant concern that has been raised with respect to our request has been the crossing of the Countryside Line. In this regard, we have

expressed our opinion that this consideration should not be determinative given all the other planning and economic benefits that could be achieved through the inclusion of the lands. In that regard, we wish to bring to the Committee's attention the recommended expansion of the Urban Area Boundary in the Village of Wellesley (page 8 of Attachment "C"), which includes a "refinement to the Countryside Line". We are similarly proposing a refinement to the Countryside Line that would round out the Urban Area to logical boundaries.

Ryan Doherty, a senior planner with our firm, will be in attendance today to speak to the Committee. Thank you for your consideration of these comments.

Yours truly,

Bousfields Inc.



Peter Smith, MCIP, RPP

cc: Larry Maseo, Cook Lands Group

From: Hal Jaeger

Sent: August 11, 2022 10:20 AM

To: Regional Council All <RegionalCouncilAll@regionofwaterloo.ca>; Regional Clerk <RegionalClerk@regionofwaterloo.ca>

Cc: Regional Official Plan Review <RegionalOfficialPlanReview@regionofwaterloo.ca>

Subject: Staff Report PDL-CPL-22-24 to be discussed August 11, 2022

Respected Chair and members of Regional Council,

Please accept the ROP amendments as proposed by staff and share my thanks with the ROP review team, for all their hard work on the growth plan options.

I realize that further work on the ROP will proceed in stages and I ask that my comments below be considered at the appropriate junctures.

Affordable Housing

With regard to IZ, I understand the province is limiting IZ to those MTSAs in which growth would not be curtailed by IZ requirements. **Please include the provision to extend IZ requirements across the region, for new builds of a minimum number of units, to be implemented IF and WHEN the province permits.** This could signal to municipalities and developers the Region's interests. And it could reduce the elapsed time between possible provincial permissions and actual implementation.

As to the draft housing policies, I remain concerned that the target of "a minimum of 30 per cent of all new residential development between 2019 and 2051 be affordable to low _and_ moderate income households" may continue to be interpreted as meaning that if one builds 30% of the units affordable to the 59.51% income decile, then the requirement is met. Under this policy, we would continue to ignore the housing needs of 59.5% of the population. **Please consider options to remove this loophole.**

Ensuring Compatibility Remains at the Heart of our Planning Process

I do not believe the proposed objectives of increasing urban agriculture, generation of power from renewable sources, or reductions in energy needed are congruent with a planning framework that does not uphold the principle of compatibility or that seeks to redefine compatibility to suit. How can we expect people to invest in urban agriculture or solar panels while we simultaneously take away their access to sunlight? How can we expect people to retrofit their homes while we simultaneously erode the setting that makes their homes viable?

While I understand the inherent problems with the previously proposed 'missing middle' policies, I am particularly disappointed to see the loss of the proposed small

start to instantiating a working definition of compatibility in the ROP. **Please ensure that compatibility stays at the core of our planning process.**

Managing the Amendment Process

I am concerned that the ROP and the planning process will not be respected, unless it is perceived as a clear, universal set of rules. I, therefore, believe that we require clarity as to how the ROP may be legally changed beyond the ROP review process. **Please prepare criteria to determine which OPA, ZBLA and minor variance requests are eligible for consideration.** This will reduce the volume of applications seeking exceptional treatment, provide for more implementation of the actual ROP policies and save our municipalities from many expensive legal challenges.

As an example, with regard to OPA requests, the Region could only consider those requests that prove that the existing land-use designations are 1) in error or internally inconsistent (a misplaced decimal point, an omission to integrate a new requirement, or treated differently from the general pattern across the municipality in question, etc.) or 2) no longer in compliance with the directives of the Province or Region. Failing this preliminary test, the application could be refused and the applicant could be informed of their option to engage in the upcoming ROP review.

A similar approach could be required of municipalities with regard to Zoning Bylaw amendment, minor variance requests and Ministerial Zoning Orders.

Supply Side Management of Population Growth

While I appreciate that planning to accommodate our forecasted future population is absolutely necessary, I ask that we also acknowledge that we cannot sustain continuous growth, as a region, province, country or planet.

- The Waterloo Region stated goal is to reduce our greenhouse gas emissions by 80% from our 2010 levels, when our population was 543,900. Achieving a per capita reduction of 80% is a great challenge. When we factor in the forecasted 70% increase in population over the 2010 base year, the per capita goalpost is shifted to an 88% reduction. Can we find ways to make it easier for ourselves to meet our commitments and live by our values?
- The situation is little different with regard to other finite resources, including food, water and electricity. We are not presently providing adequately for the population locally and globally, yet are planning to increase (perhaps ineffective) demand.

Does it really make any difference to the environment or the availability of affordable necessities if we achieve efficiencies (often at the cost of reduced quality of life) while growing our population? We still have time to reset our course in advance of

2051. **Please consider some supply-side management options to be implemented via the ROP.**

Thank you for your consideration,

Hal

Hal Jaeger
Kitchener, ON

From: Alisa McClurg
Sent: August 11, 2022 9:55 AM
To: Regional Council All <RegionalCouncilAll@regionofwaterloo.ca>
Cc: Bruce Lauckner <BLauckner@regionofwaterloo.ca>; Rod Regier <RRegier@regionofwaterloo.ca>; Danielle De Fields <DDeFields@regionofwaterloo.ca>; mackinnon@regionofwaterloo.ca; Cushla Matthews <CMatthews@regionofwaterloo.ca>; ubczynski@regionofwaterloo.ca; Kate Daley <KDaley@regionofwaterloo.ca>; Vanvilay Cowan <VCowan@regionofwaterloo.ca>
Subject: Input to Regional Official Plan

Dear Honourable Regional Chair & Councillors,

This past June 29th, I presented as a delegate regarding the "Regional Official Plan" (ROP) update. For your consideration and records, I am forwarding you an updated version of that presentation, which includes my recommendations. Given how the ROP update will affect development in Waterloo Region for the next 30 years, I strongly urge you to consider these recommendations.

I appreciate your time and consideration. Should my suggestions strike a chord with you, and even if they don't, I would love to hear your thoughts!

Sincerely,

Alisa McClurg (nee Krause)
KW Urban Harvester Coordinator
kwurbanharvester.org
B.A. (English) | B.E.S (Environmental & Resource Studies) | M.E.S. (Planning)

Hello. My name is Alisa McClurg.

I am the coordinator for the community garden group [KW Urban Harvester](http://kwurbanharvester.org). We work to transform urban spaces into anything sustainably edible.

As hard as we work to produce food in urbanized spaces, we recognize that we still need our remaining green spaces. To grow food to feed ourselves. To ensure we have the clean air that our green spaces purify. To provide the clean water which our green spaces filter and replenish. We also need to halt, and then reverse, global climate change, so that we have a climate more suitable for growing food.

If we continue to develop our green spaces, we won't have that.

Taking these other matters into account, without a doubt we have a challenging future ahead of ourselves. This makes it critical that careful thought and consideration goes into updating the 30 year "Region Official Plan" (ROP).

With that in mind, I congratulate Waterloo Region for putting forward option #4 for the ROP, which would protect much of our farmland from sprawling, energy-demanding development. So much of this Region has already been developed in this way. We cannot afford to lose much more green space.

At the same time, we need more housing and employment spaces. Potentially, at an exponential rate. And spaces also that are suitable for those needing them. This means, for instance, not forcing families to live in high density two- or even one-bedroom apartments, which is happening now.

Additional Land-use Management Initiatives

Here are some innovative initiatives that would help protect land from development, and would address other concerns too:

1. *Modify bylaws that deter homeowners from renting out units in their homes, to make it easier for lower-income individuals like seniors to earn income.*
2. *Rescind zoning and bylaws that deter homeowners from building additional (i.e. tiny) and add-on housing units onto their homes, and promote these changes in the community.*
3. *Provide policies to allow for housing and employment infrastructure that is accessible and barrier-free (e.g. for the disabled and seniors), to avoid building unneeded infrastructure.*
4. *Investigate ways to provide lower-density housing to groups who wish to live in shared spaces, such as extended or blended families. Examples of this could include i) providing separate basement entrances (e.g. for adult children) and ii) lowering on-site parking requirements to take into account the potential for vehicle sharing between household members, while also iii) providing some extra parking in community parking lots for blended households where many individuals have their own vehicle.*
5. *Further to point #4, explore planning for the commons (as advocated for in “feminist planning”) by supporting development initiatives that create community kitchens, community gardens, community dining halls, community workshops, and such. These common spaces could be created in both new development, and in the redevelopment of already built-up spaces.*

While I feel excited about these potential initiatives, I would like to add they are only a starting point. With more time for community consultation and deliberation, many more ideas could emerge.

Benefits of Proposed Initiatives

The initiatives put forward here could benefit our community in the following ways:

- Address many of the above-mentioned shortages in housing and employment infrastructure, AND ecological challenges that the Region is facing.
- Provide desperately needed housing more rapidly, which is critical given the housing crises we are facing.
- Ensure that the entire population has access to adequate housing, including those with disabilities, mobility challenges, and such.
- Spread profit from development more evenly throughout the community to smaller-scale developers and builders.
- Potentially provide housing of greater quality, given that smaller-scale businesses likely may be also more locally-based, and not as driven by strict profit-making motives.
- Involving smaller-scale businesses may also "put a damper" on the practice “flipping” properties for profit, creating more stable, thriving communities as a result.

Crossing the Cultural Chasm

An unfathomable and uncrossable cultural chasm may seem to exist between where we are now, and where we would need to get to, to undertake the initiatives put forward here. Major rapid changes would need to be made to our economic, social and other systems, many of which I am guessing have not been considered, let alone voiced.

This applies perhaps most to my fifth proposed initiative, around planning for the commons. Significant hurdles likely would present themselves around getting some people here to live and work together (e.g. cook) with other households. Overall, as a culture, we have not adopted this sort of co-living and co-working model as other places have to varying degrees (e.g. in Israel's kibbutzim, many members still share much of their daily lives and activities).

Despite these hurdles, examples exist which suggest planning for the commons has potential in this Region. Numerous community garden groups like mine have been working together for years, gardening together in common spaces. In terms of housing, eco-community groups like [To Thrive Together](#) in nearby Bloomingdale and [Beaver Creek Housing Co-operative](#) in Waterloo, have successfully created high density, eco-housing, which does so partly by including common areas for the community.

Other locally-based organizations like the [Upstart Collaboratory for Collaborative Culture Designing](#), of which I am also a part, have been working for over a decade, exploring how we can better work and live together, despite (and in some cases, because of!) our differences.

Final Reflection

Einstein is quoted as having said that if he had one hour to save the world, he would spend fifty-five minutes defining the problem and only five minutes finding the solution.

Although well-meaning, the options that the Region has proposed so far largely seem to be coming from looking at our problems through the same old lens. A lens where, it seems, we as a Region feel we cannot deal with both the housing/development and environmental crises at the same time. That we must choose between the two.

We need to reconsider that so-called problem, in all of its aspects, whether voiced or not. To realize that perhaps some of the problem lies in not using our existing building infrastructure wisely, not always building the proper type of new infrastructure, and lacking adequate skills and know-how around how to live and work together in the spaces available to us.

While the initiatives laid out here may seem difficult and time-consuming, so too is potentially locking in lengthy, costly, and divisive disagreements about how to partition up the Region's remaining land and other resources. Should Council courageously decide to explore their potential, we will be in a better position to effectively guide development in this Region over, what promises to be a challenging, next thirty years.