



SHAPING GREAT COMMUNITIES

March 28, 2024

File No.: 22226

Ministry of Municipal Affairs and Housing  
777 Bay Street  
Toronto, ON  
M5G 2G2

Attn: Honourable MPP Paul Calandra  
Minister Municipal Affairs and Housing

**Re: Schlegel Urban Developments (Township of Woolwich- Elmira and St. Jacobs)  
ERO # 019-8273  
Get it Done Act, 2024 – Amending the Official Plan Adjustments Act, 2023**

Dear Minister Calandra:

On behalf of our client, Schlegel Urban Developments, I am writing to provide commentary on the ERO posting of the Get It Done Act, 2024 - Amending the Official Plan Adjustments Act, 2023.

Further to the previous correspondence submitted to MPP Steve Clark through ERO #019-5952 January 4, 2023 regarding ROPA 6 (see attachment 1), I am requesting that the lands in Elmira and St. Jacobs be prioritized for housing approvals. I agree with the December 5, 2023 submission by the Township of Woolwich Mayor and endorsed by Township Council regarding the settlement area expansion for residential development in Elmira and St. Jacobs (see attachment 2).

However, Woolwich Official Plan staging and phasing policies restrict development of these lands. Implementing a Settlement Area boundary adjustment is not sufficient to ready the lands for residential development. The lands have sufficient servicing and are contiguous to existing development. Appropriate planning approvals (e.g. Draft Plan of Subdivision) will ensure that they are planned in accordance with good planning principles and consistent with the Provincial Policy Statement, providing for housing choices within a complete community. In the absence of the staging and phasing policies, construction could start as early as 2025 and could help achieve the 2031 housing targets.

The Township of Woolwich Official Plan staging and phasing policies predate the Places to Grow Growth Plan for the Greater Golden Horseshoe. Of note, the 2023 MMAH decision on ROPA6 introduced policy 2.J.12 which required the Township of Woolwich to review and update its staging and phasing of development policies in Elmira to expedite development applications for housing projects. Thus, the previous MMAH decision therefore appropriately recognized that the phasing and staging of development policies in the Woolwich Official Plan are in need of an update.

While I agree with the principle of orderly growth (no leap-frogging, for example), the Woolwich staging and phasing policies preclude applications from advancing and prevent Township housing targets from being achieved. The existing staging policy creates a condition of uncertainty for the

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subject lands (e.g. during the period until the Woolwich OP is updated and the manner in which the Woolwich OP may update its phasing and staging policies).

**As such, I request that the Province modify ROPA6 to provide site-specific exemptions to the subject lands in Elmira (see attachment 3) and St. Jacobs (see attachment 4) from the phasing and staging policies of the Township of Woolwich Official Plan to facilitate expediting their residential development.**

Thank-you for your thoughtful consideration and commitment to the timely building of homes, seniors housing and well-planned residential communities in this Province.

Sincerely,  
**GSP Group Inc.**



Heather Price, MCIP, RPP  
Vice President, Development Planning Manager

Encl. (4)



MGP File: 22-3105

Matthew Cory  
905 513 0170 x116  
[mcory@mgp.ca](mailto:mcory@mgp.ca)

January 4, 2023

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

Attention: Gabriel Kim (Municipal Services Office - Western Ontario)

**RE: Syrier Holdings Inc. and Birdland Developments Inc. (Township of Woolwich - Elmira)  
ERO No.: 019-5952 (Ministry Reference No. 30-OP-222206)  
Comments on Waterloo Region Official Plan Amendment 6**

Malone Given Parsons Ltd. ("MGP") are the planning and land economics consultants for Syrier Holdings Inc. and Birdland Developments Inc., owners of lands ("Subject Lands") identified for future residential development in the community of Elmira in the Township of Woolwich (the "Township"), one of the lower-tier municipalities in the Regional Municipality of Waterloo (the "Region"). I am writing to provide commentary on the ERO Posting of the Region of Waterloo Official Plan Amendment No. 6 ("ROPA 6"), as follows:

### **1. Subject Lands**

The Subject Lands total approximately 45 acres and are contiguous to the built urban edge of Elmira, the largest Township Urban Settlement Area in the Township. The lands are located north of Listowel Road and west of Arthur Street South, as shown on Figure 1 below.

The Subject Lands have been located within the Countryside Line since it was first established in the Region of Waterloo Official Plan ("ROP"). They are within the Township Urban Area of Elmira and are designated as Township Designated Greenfield Area in the ROP. Accordingly, the Subject Lands have been identified as "Residential and Ancillary Use" in the Township of Woolwich Official Plan ("Township OP").

Despite sufficient capacity in existing Regional municipal wastewater infrastructure for an additional 6,000 residents in Elmira, the Subject Lands are identified in the Township OP with a prescribed development timeline of 2031 or beyond (Southwest Policy Area / Priority Area 1A-2).

A conceptual development plan for the lands which conforms to relevant provincial and municipal policies with respect to land use and density demonstrates capacity to provide over 350 housing units in the immediate term capitalizing on existing infrastructure located at the property limits.

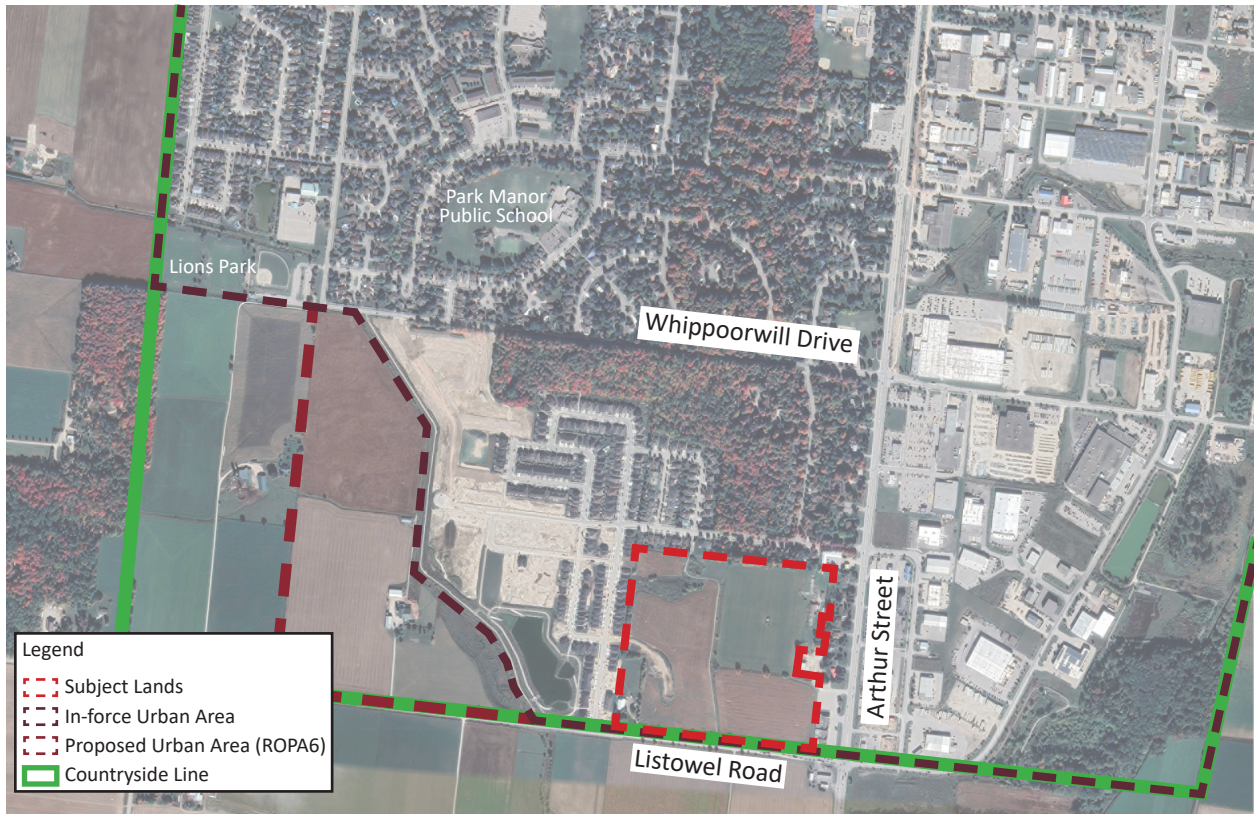


Figure 1: Subject Lands

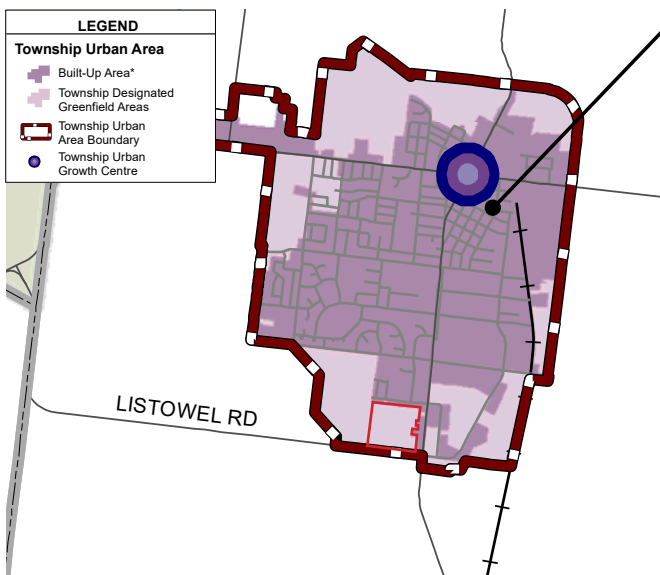


Figure 2: In-force ROP: Township of Woolwich Urban Area

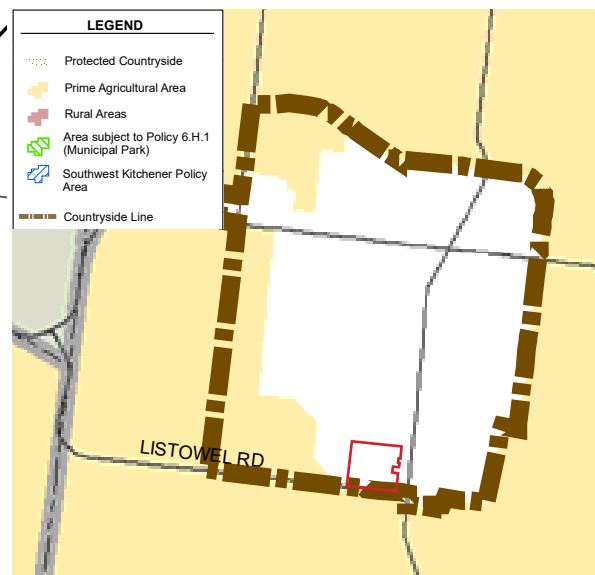


Figure 3: In-force ROP: Township of Woolwich Countryside Line



## 2. Impact of Local Planning Policies on Housing Delivery

Since 2009, our clients' lands have been identified in the ROP as "Township Designated Greenfield Area" for residential development.

To date, residential development and the delivery of the supply of housing on our clients' lands and across Elmira has been hindered by policies within the Township OP which restrict growth at 3% annually with a prescribed annual growth rate of 366 persons (Township OP Policy 7.29.3.1).

One of the key foundations for the existing growth management policies was the "Growth Management and Master Servicing Study for the Settlements of Elmira and St. Jacobs (1992)" which was implemented through Official Plan Amendment 32 (1992), a Township OP amendment which was eventually approved by the OMB in 1994. These types of restrictive growth management policies have been carried forward over a period of 30 years and are used to this day to restrict housing supply in Elmira and St. Jacobs.

The upper-tier ROP, through ROPA 6, contains policies (Policy 2.A.5) that prohibit lower-tier Area Municipalities from restricting the amount or timing of urban growth where planned infrastructure and community facilities are in place. Despite this, the existing Township OP contains growth management policies that are expressly designed to restrict growth.

Within the Township OP, our clients' lands are identified as the South-west Policy Area (Priority Area 1A-2) with a timeline for development at or beyond 2031 unless there is a resolution from Township Council to advance such timing.

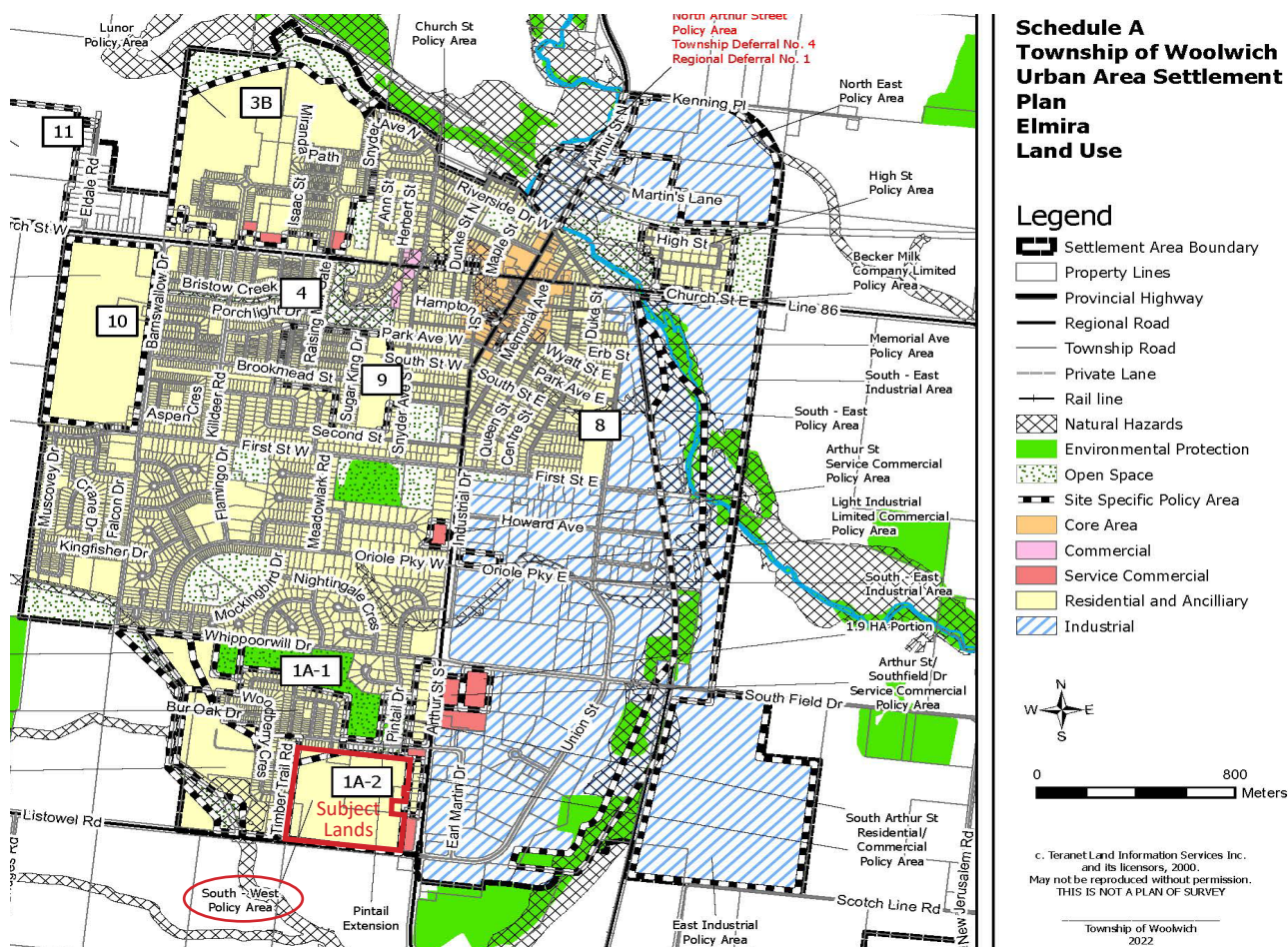


Figure 4: Township of Woolwich Official Plan - Urban Area Settlement Plan for Elmira, Land Use. Subject Lands depicted in red.

### 3. Planned Growth in Elmira

The Township OP (7.29.4.1) has identified a 2031 population target for Elmira of approximately 17,200. This represents close to half of the total 2031 growth target for Woolwich of 36,500.

The population in Elmira as of 2021 was 11,380 and net growth for the period of 2016-2021 was only 517 people which is an average of 103 persons per annum (Statistics Canada, 2021 Census data).

To achieve a population of 17,200 by 2031, Elmira will need to grow at a rate of 647 persons per annum, a significantly higher rate than that which is provided for in the Township OP of 366 persons.

Capacity in existing wastewater infrastructure can accommodate an additional 6,000 people within thousands of new housing units to 2031, as confirmed by Walter Fedy in **Appendix 1**. Existing Township policies which artificially control the supply of housing are in direct opposition to the Province's stated priority to see a significant increase of housing built in Ontario over the next 10 years and beyond.

### 4. Provincial Target of 1.5 Million New Homes by 2031

Through a Bulletin (019-6171) posted to the ERO on October 25, 2022, the province identified specific housing construction targets for 29 municipalities across Ontario, including within the Region of Waterloo, targets for the cities of Cambridge, Kitchener and Waterloo.

Collectively, these housing targets for 29 individual municipalities across Ontario represent 1,229,000 of the identified 1,500,000 homes required by 2031.

Based on this allocation, the Province also recognizes the need to build over 270,000 homes in Ontario's smaller municipalities by 2031.

Woolwich Township, and specifically the highest-order Township of Woolwich Urban Area of Elmira, is well positioned to deliver a portion of those 270,000 homes identified to be built in smaller municipalities and help achieve the objective to build the much needed 1.5 million homes across Ontario by 2031.

The Subject Lands would represent a most suitable location to do so given existing Regional planning policy designations and infrastructure capacity.

Municipality	Housing Target
City of Toronto	285,000
City of Ottawa	151,000
City of Mississauga	120,000
City of Brampton	113,000
City of Hamilton	47,000
City of London	47,000
City of Markham	44,000
City of Vaughan	42,000
City of Kitchener	35,000
Town of Oakville	33,000
City of Windsor	13,000
City of Richmond Hill	27,000
City of Burlington	29,000
City of Oshawa	23,000
City of Barrie	23,000
City of Guelph	18,000
City of Cambridge	19,000
Town of Milton	21,000
Town of Whitby	18,000
City of St. Catharines	11,000
Town of Ajax	17,000
City of Waterloo	16,000
City of Kingston	8,000
City of Brantford	10,000
Clarington	13,000
City of Pickering	13,000
City of Niagara Falls	8,000
Town of Newmarket	12,000
Town of Caledon	13,000
<b>Totals</b>	<b>1,229,000</b>

Figure 5: ERO #019-6171 - 2031 Housing Targets

### 5. Proposed Conceptual Development Plan

The younger-than-average demographic in Waterloo Region is seeking ground-related housing. This includes single-family homes, but also includes street townhomes, back-to-back, and stacked townhomes - building typologies which are often referred to as the “missing middle”.

The attached conceptual plan (see **Appendix 2** and below Figure 6) includes a block of multiple-unit residential lands identified for purpose-built rental housing which will help meet a significant market need (missing middle rental units) in smaller communities such as Elmira. It also provides for a mix of ground-related forms including freehold singles and street townhomes with the current development concept achieving a greenfield density in excess of 50 persons per hectare.

These lands, adjacent to the Built Up Area of Elmira, are available today to contribute to Waterloo Region’s share of meeting Provincial housing targets.

The proposed plan of subdivision (**Appendix 2**) would allow for 350 new homes to be constructed, providing additional housing capacity for a population of about 950 people.

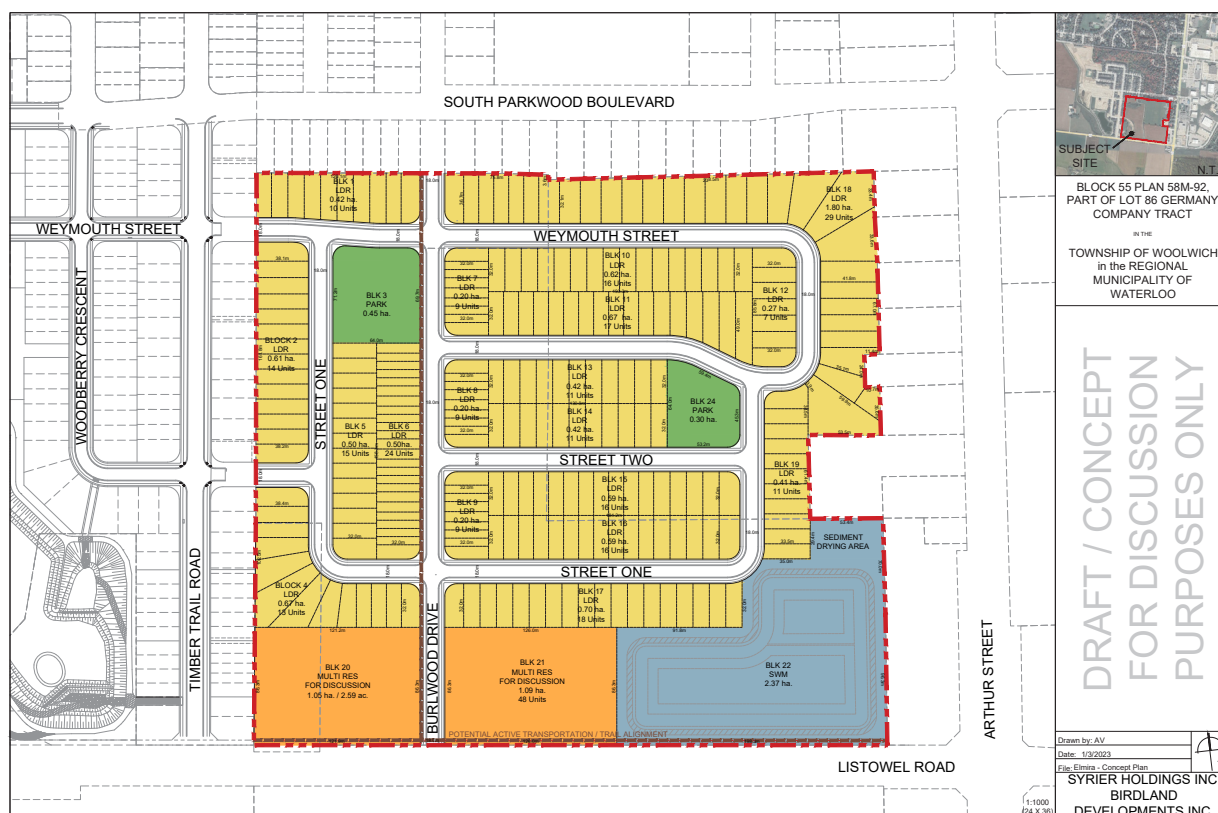


Figure 6: Proposed Concept Plan for the Subject Lands achieving a density in excess of 50 persons per hectare with a complete range of housing.

### **5.1      *Timing of Construction for New Homes***

New home construction could commence in 2024/2025 and very much contribute to meeting the identified 2031 provincial housing need with construction unfolding over a period of approximately 6 years.

Sanitary servicing stubs with adequate capacity presently terminate at the property boundary. Making use of these services in the immediate term represents an efficient use of existing municipal infrastructure investments which have already been made and provides for the ability to quickly bring new missing middle homes to market.

If planning approvals were achieved in 2023, grading and internal servicing could be achieved in 2024 and home construction could commence immediately thereafter.

Existing servicing capacity within Elmira can accommodate an additional 6,000 residents before system upgrades related to capacity would be required. Please see **Appendix 1** for a Preliminary Servicing Overview prepared by the consulting engineering firm WalterFedy outlining serviceability of the lands.



## Summary

The Subject Lands have been identified in the ROP for residential development since 2009. They have been precluded from development on the basis of outdated growth restriction policies in the Township OP which are not in keeping with the modern Provincial mandate and stated priorities.

The lands abut the Built Up Area and have existing municipal services at the property limits, allowing them to develop in an efficient manner in a very short timeline. **Appendix 1** provides an overview confirming serviceability of the lands and the presence of sufficient infrastructure capacity.

The proposed plan of subdivision (**Appendix 2**) would allow for 350 new homes to be constructed, providing additional housing capacity for a population of about 950 people.

It is our expectation that through an eventual conformity update to the Township OP following provincial approval of ROPA 6, that conformity with Policy 2.A.5 will require amendments to the restrictive Township OP growth management scheme as it exists today.

Given the pressing need to construct new housing in Ontario, including in smaller urban municipalities such as Elmira, a site specific solution which supercedes existing restrictive growth management policies would allow the Subject Lands to form part of the solution to building 1.5 million new homes by 2031.

The Subject Lands are positioned to be developed as part of a complete community and will provide multi-modal connectivity and completion of adjacent built neighbourhoods.

As noted in this letter, development of the subject properties is long overdue; expediting development on them will assist the Township, Region, and Province in providing much needed housing. The properties can proceed to development with densities that assist in the achievement of the Region's designated greenfield density target.

Development can occur on the properties concurrent with the Region's realization of its intensification targets and will represent the orderly progression of development that is a logical extension of the existing settlement pattern in Elmira. The properties will be served by infrastructure and public service facilities required to meet resident's needs.

The scale of the properties allows future development to provide a range of housing choices to achieve a 15-minute neighbourhood, where the provision of this housing should be encouraged comprehensively and concurrently.

It is therefore our opinion that the properties should proceed immediately to development, and that any delay in development approvals relating to growth management or the phasing policies imposed by the Region or Township is not good planning and would be counter to the planning intent of the Province to expedite the delivery of homes and is not appropriate to impose under the policies of the Provincial Growth Plan or the Provincial Policy Statement.

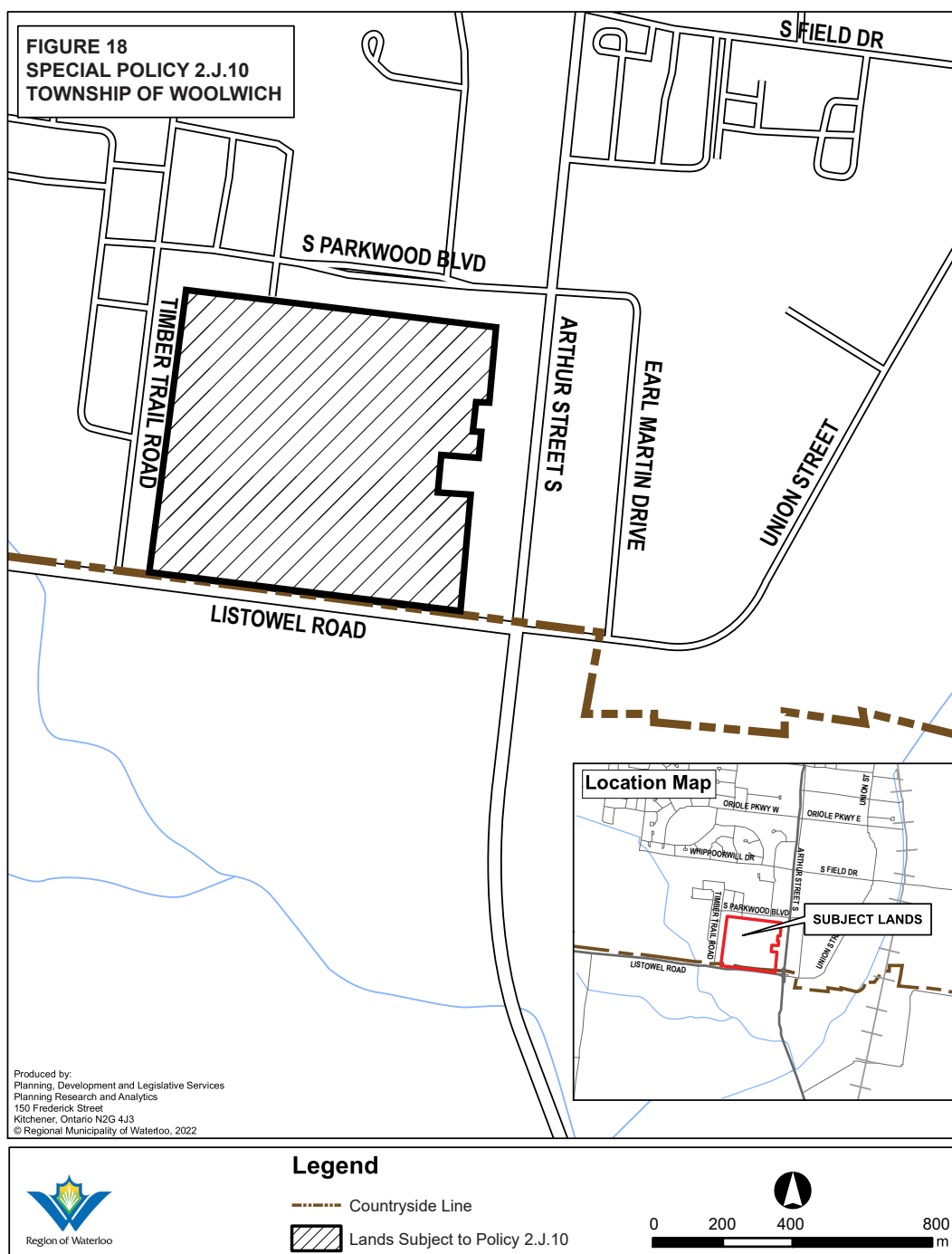
The properties can and should move forward to development without further delay, and accordingly we request that a site-specific policy be included in the Region's official plan exempting the properties from any requirements for phasing.



**Request of the Minister**

We request that the Minister implement the following amendment to ROPA 6:

2.J.10 Notwithstanding any policies to the contrary, for the lands shown on Figure 18 within the Township of Woolwich (Part of Lot 86, German Company Tract) generally located north of Listowel Road, east of Timber Trail Road, south of South Parkwood Boulevard and west of Arthur Street North, development applications can proceed immediately and shall not be subject to any growth management or phasing requirements and any development on the lands shall not be required to be phased or staged.



If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.

A handwritten signature in blue ink, appearing to read 'Matthew Cory', enclosed within a blue oval scribble.

Yours very truly,  
Malone Given Parsons Ltd.

**Matthew Cory, MCIP, RPP, PLE, PMP**

**Principal, Planner, Land Economist, Project Manager**

cc. Syrier Holdings Inc.  
Birdland Developments Inc.

**Attachments:**

- Appendix 1*      *WalterFedy Preliminary Servicing Overview Technical Memo*
- Appendix 2*      *Proposed Concept Plan*
- Appendix 3*      *Proposed Mapping Amendment to ROPA 6*



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## Office of the Mayor

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December 5, 2023

To Hon. Paul Calandra, Minister of Municipal Affairs and Housing

Re: Proposed Legislation to Reverse Previous Decisions on Municipal Official Plans/Official Plan Amendments

Thank you for the opportunity to comment on the provincial changes to the Regional Official Plan (ROPA 6) settlement area boundaries. The Township of Woolwich settlement boundaries were extended through the Provincial approval, beyond what was proposed in the Region of Waterloo Official Plan (ROPA 6) to what was identified as the Countryside line. This resulted in approximately 1800 hectares of additional land available for development. Since the Provincial expansion, the Township has taken significant steps to implement that decision into our Township Official plan and secondary plans.

I have listened to our local community environmentalists, residents and developers. In general, the framework provided in the Regional proposal provides a good collaborative plan for our municipalities to work together. However, it constrains our ability to comprehensively plan for our communities, especially in the higher growth area of Breslau. **Therefore, I believe the better way forward is to adopt the provincial framework to extend the urban boundaries to the Countryside Line as shown on the attachments for Breslau, St. Jacobs and Elmira. That said, it is very important that the Township of Woolwich retains control over the rate of growth (while maintaining expected growth targets). Without that authority, I would revert back to the Regional Official Plan as a way to ensure staged growth.**

### Breslau

The addition of approximately 1500 hectares of land to Breslau in the extended area allows the Township to cohesively plan for the future of the community. We can address, not only housing and employment expansion, but also badly needed community infrastructure, a retail core, recreation facilities, trails, transportation infrastructure and other amenities. It is important that the Township be allowed to set priorities for future studies for drainage, environmental considerations, Airport lands and a future GO station.

### St. Jacobs and Elmira

St. Jacobs and Elmira had approximately 300 hectares of land added. The additional land in Elmira allows for flexibility to develop land for residential or employment with opportunities for economic development. These land additions also allow a more wholistic consideration of Elmira transportation needs. Additional land in St. Jacobs allows for additional housing, including opportunities for long-term care homes.

### Staged Approach

The Township is committed to supporting intensification, complete communities, protection of environmental land and ensuring viability of agricultural land. Therefore, the Township is only supportive of the development of the additional land through a planned, staged, and phased approach. The Township has a long history of managed, staged growth which protects the Township from sprawl and ensures orderly development to meet the needs of the Township. To comprehensively plan for the future, this phased plan would ensure the growth accommodates appropriate densities, transit and active transportation, servicing and infrastructure and community uses while also maintaining the protection of environmental areas and interim agricultural uses. Without the allowance for staging policies to control growth, the expansion is not recommended. The Township

supports the additional land with the ability to control growth.

As such the Township would request that the provincially expanded boundaries be approved as it applies to the Township of Woolwich as shown on the attachments to this letter with the following modifications to the Regional Official Plan:

- That development in the Township of Woolwich shall be staged in accordance with the following and considering density and population targets:
  - That the Township identify the lands to be developed in a phased and staged manner, including approximate timelines for when the lands may be developed.
  - Servicing availability and a servicing plan.
  - To achieve the density targets in settlement areas of 45 jobs and people per hectare in Township Urban areas of Elmira and St. Jacobs and 55 jobs and people per hectare in the Breslau Urban Area.
  - That lands identified in the settlement area, but not required before 2051 may be designated but identified for further study prior to development, identified as lands for longer term growth.
- That amendments to the staging shall only take place during a Township Official Plan review process where population projections have changed, servicing changes dictate a change, or growth factors have determined a need.

**In conclusion, the Township is requesting that the Minister continue with the expanded settlement boundaries to the Countryside Line only with staging and phasing policies to cohesively plan for growth.** Allowing the Township to take control of the long-term planning for the area through a controlled approach will allow this municipality to plan for the needs of Woolwich and create a cohesive community for our residents.

The Township of Woolwich with the other area Municipalities has been developing a transition plan for the transfer of planning responsibilities with the proclamation of Bill 23. This will help Woolwich implement the long term vision for growth in the Township. Through this letter we are also requesting the Province proceed with the proclamation of Bill 23 or alternatively support the transition of planning delegation to area municipalities. With the delegation of planning responsibilities we also ask the Province to support the implementation of broad infrastructure servicing plans on a region-wide basis.

Yours truly,

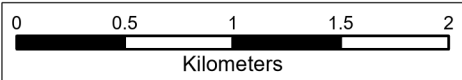
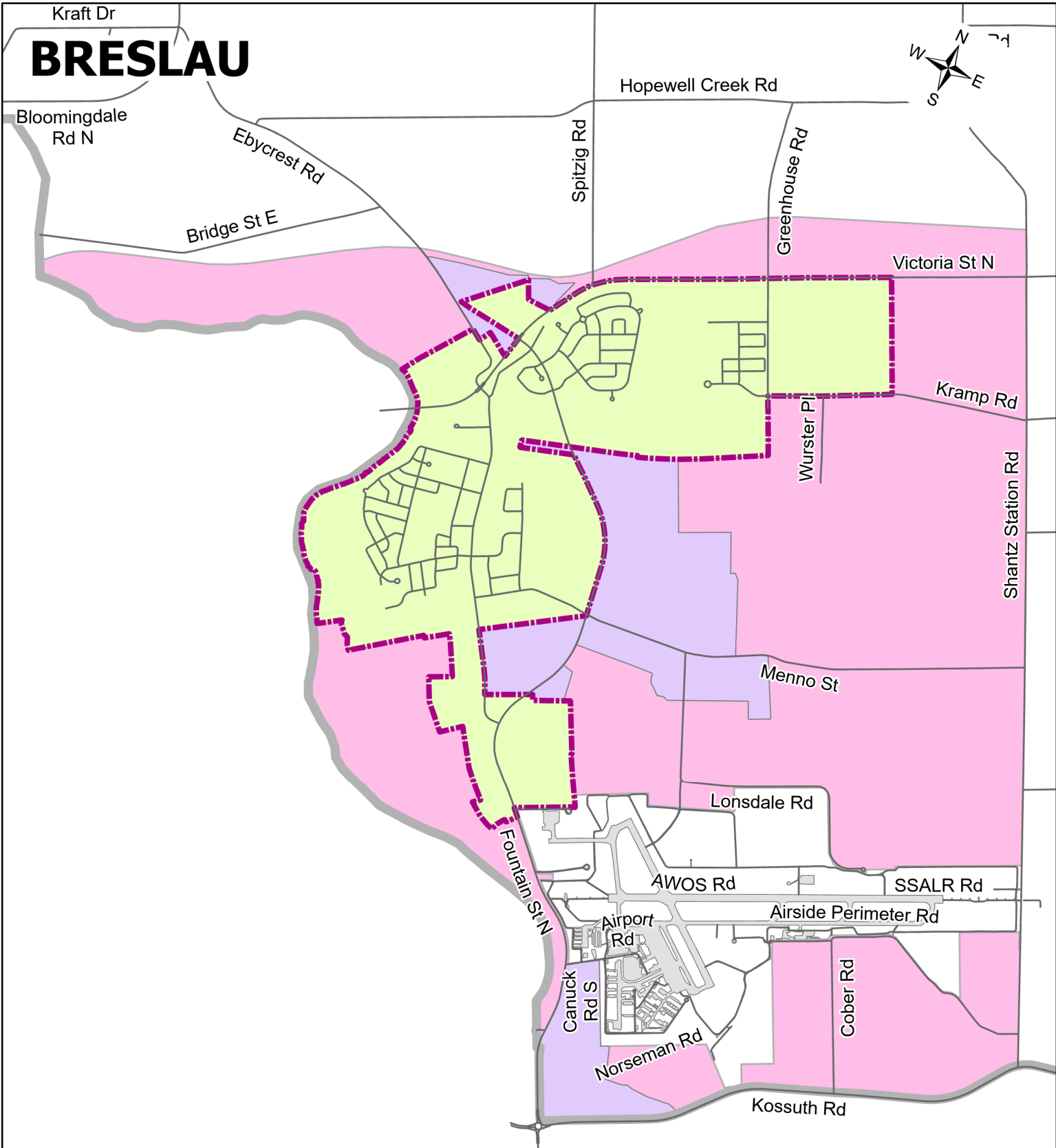
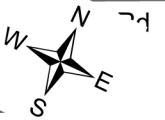
Mayor Sandy Shantz  
Township of Woolwich

Attachment 1 – Breslau Settlement Boundary




Attachment 2 - St. Jacobs Settlement Boundary

Attachment 3 – Elmira Settlement Boundary

# BRESLAU

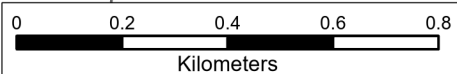
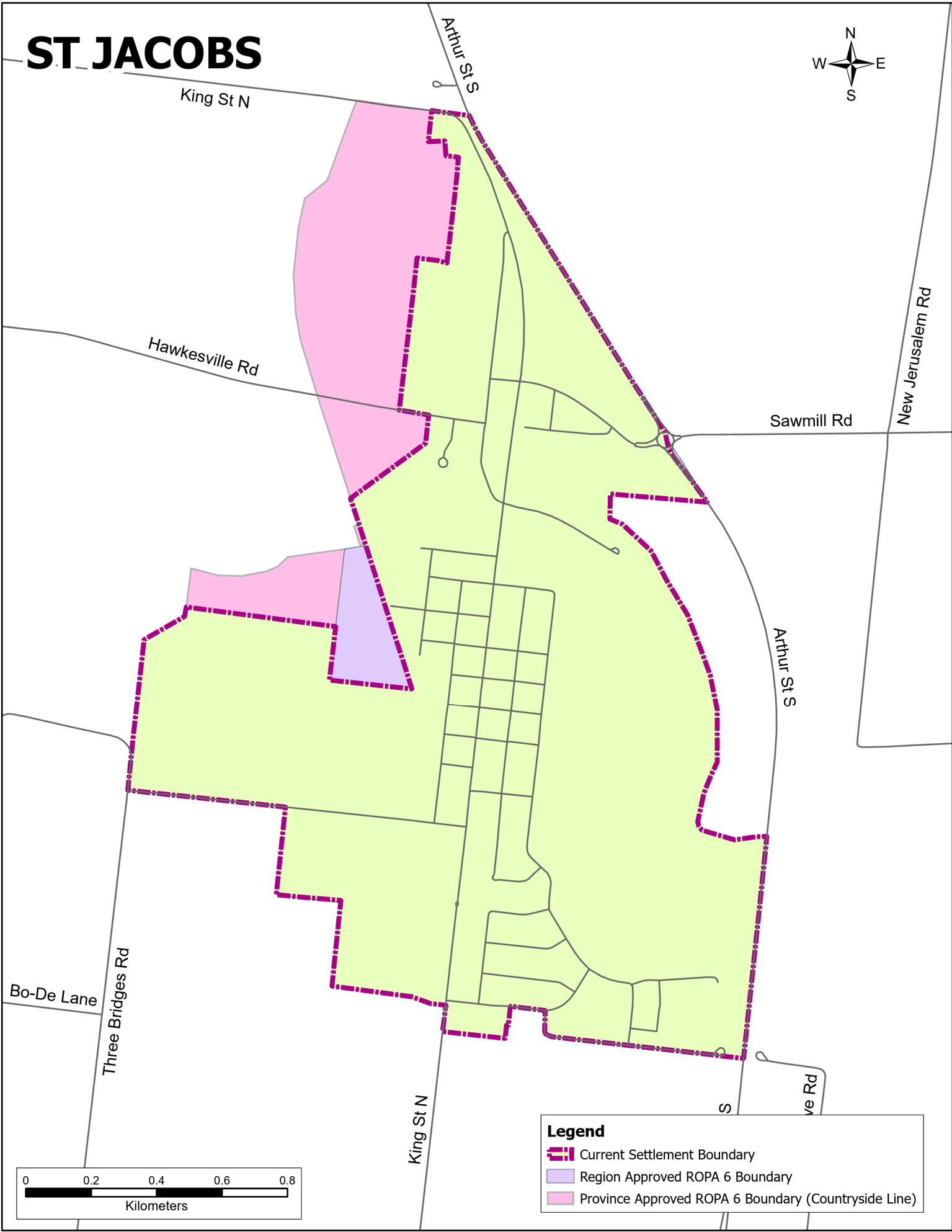


**Legend**

-  Current Settlement Boundary
-  Region Approved ROPA 6 Boundary
-  Province Approved ROPA 6 Boundary (Countryside Line)



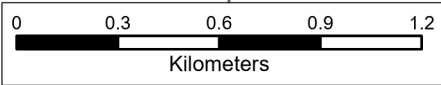
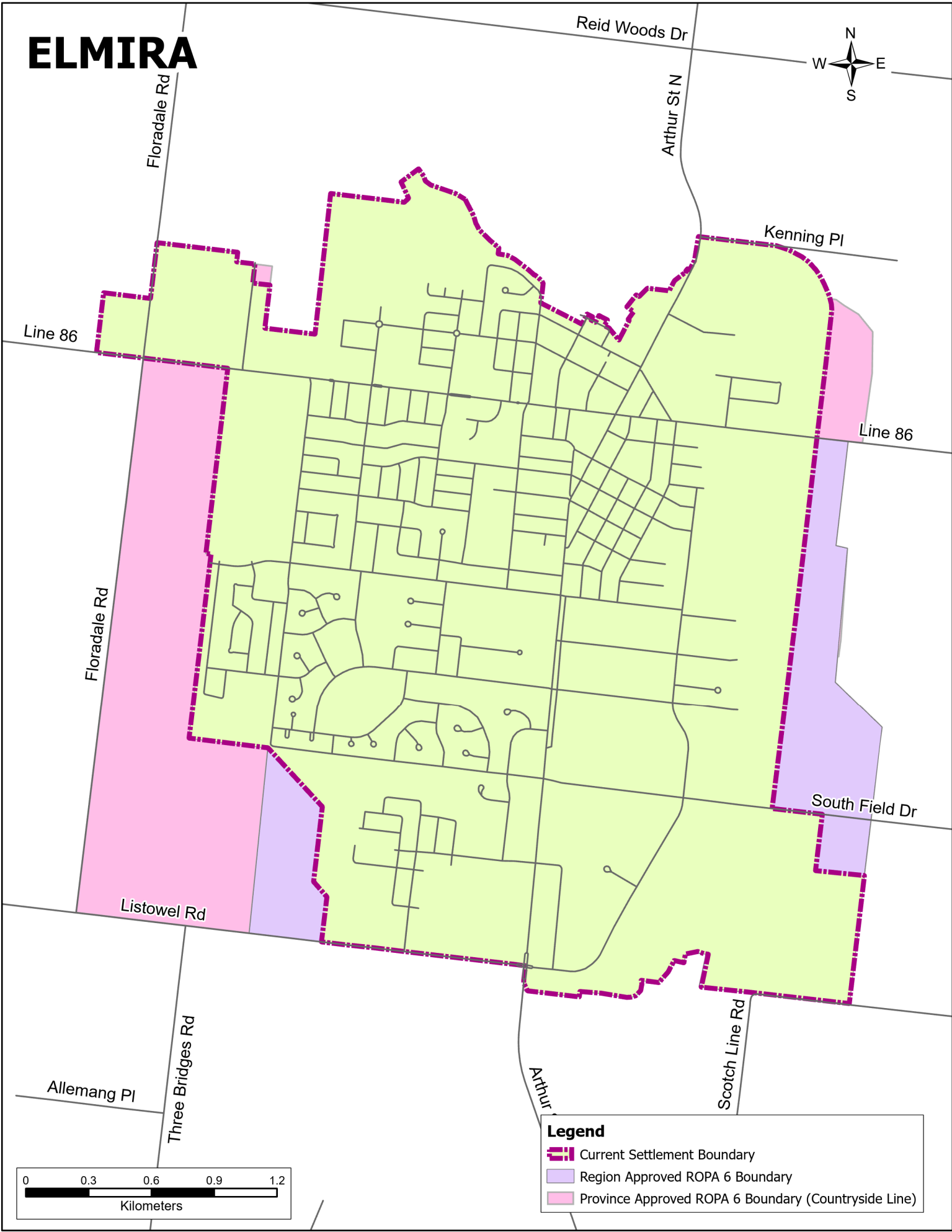
# ST JACOBS



**Legend**

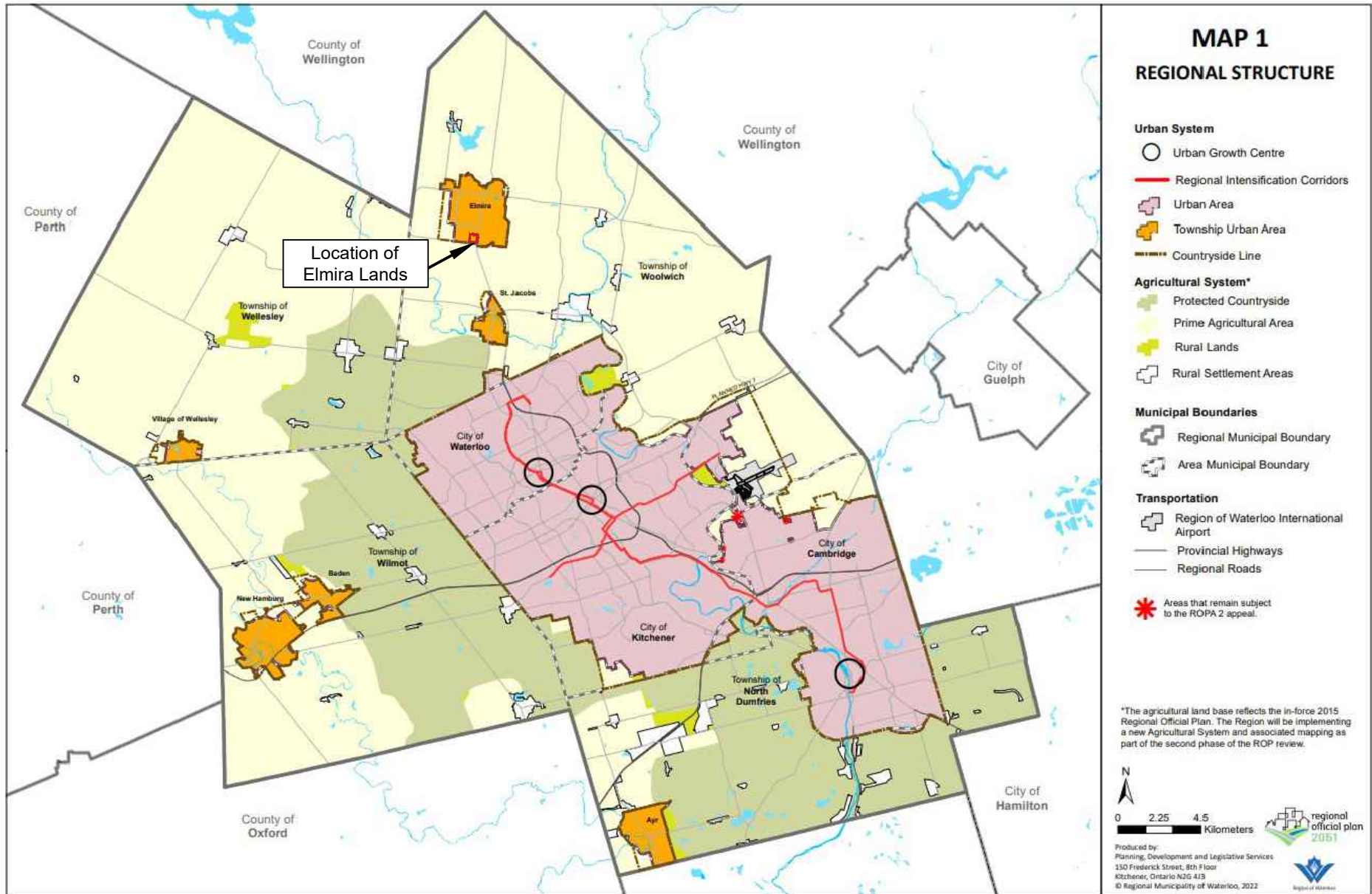
- Current Settlement Boundary
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- Province Approved ROPA 6 Boundary (Countryside Line)

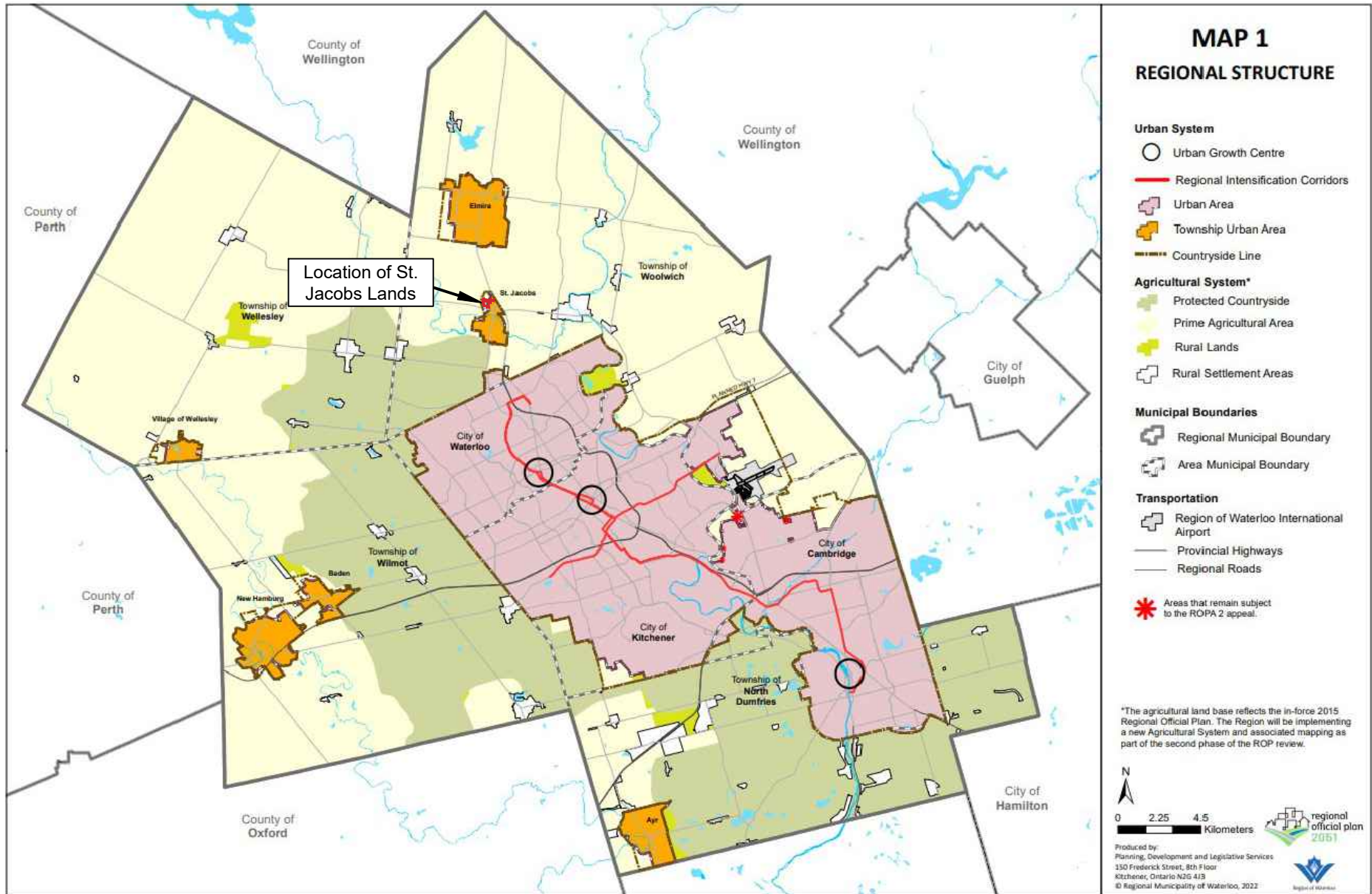
# ELMIRA



**Legend**

- Current Settlement Boundary
- Region Approved ROPA 6 Boundary
- Province Approved ROPA 6 Boundary (Countryside Line)





Location of St. Jacobs Lands

\*The agricultural land base reflects the in-force 2015 Regional Official Plan. The Region will be implementing a new Agricultural System and associated mapping as part of the second phase of the ROP review.

N

0 2.25 4.5 Kilometers

regional official plan 2021

Region of Waterloo