



April 24, 2022

Hold The Line WR response to Regional Official Plan draft policies

The Region of Waterloo is updating the Regional Official Plan, a policy document that guides long-term growth and development in the Region to 2051. Staff have released two reports for public feedback:

On April 6, 2022, a set of draft policies related to housing was released for public feedback. On April 12, 2022, the draft Land Needs Assessment (LNA) was released (Report PDL-CPL-22-11). Both of these documents can be found on the “Updating the Regional Official Plan” website at <https://www.engagewr.ca/regional-official-plan>.

Response to draft Land Needs Assessment

The draft Land Needs Assessment (LNA) provides three options for growth in Community Areas, and two options for growth in Employment Areas. The Region will ultimately select one Community Area option and one Employment Area option to pursue.

Community Area options

1. 50 p+j/ha
50% intensification
2,208 ha urban expansion
2. 60 p+j/ha
60% intensification
376 ha urban expansion
3. 66 p+j/ha
60% intensification
No urban expansion

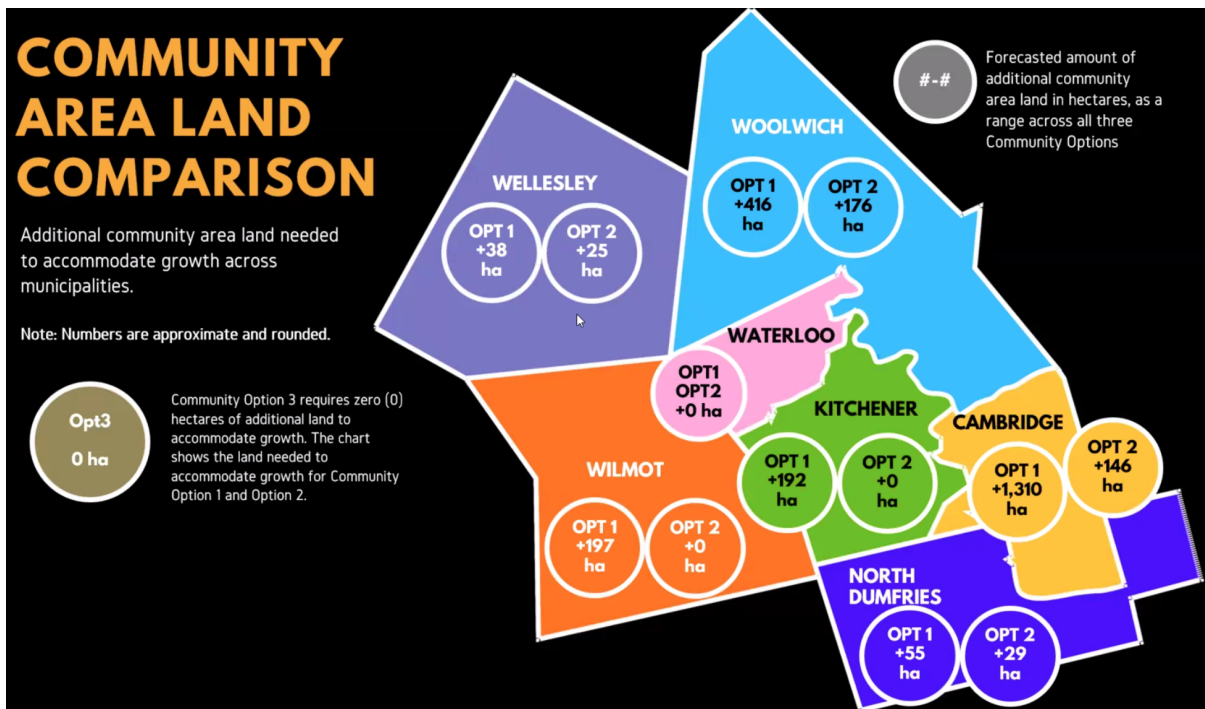
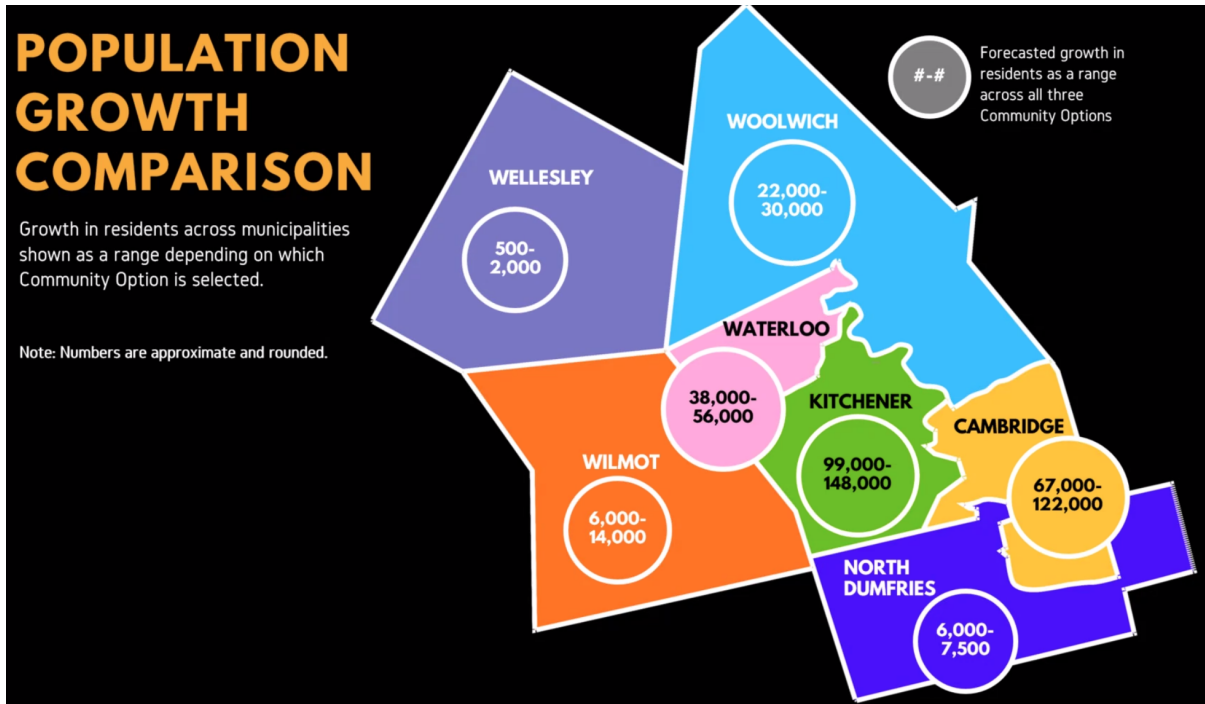
Employment Area options

1. 35 jobs/ha
15% intensification
2. 35 jobs/ha
25% intensification

p+j/ha = people and jobs per hectare

All options would see an increase in jobs and employment in all 7 area municipalities. The difference between the options is the amount of additional land required to expand the urban area.

These maps show the range of population growth, and of new land needed, in each municipality. (Maps provided by Region staff during April 22, 2022 public meeting)



Countryside Line must be maintained

The report claims that “All Options provide a greater mix of medium and high-density housing options relative to the current trends”, but this is wrong. Since our current greenfield densities are above 50 p+j/ha, **Community Area Option 1 would actually lower the average density for new development**. We would be developing new greenfield communities that are less compact than the ones we’re building now, resulting in less medium- and high-density housing than the status quo.

The report states, **“Option 1 would yield the largest urban area expansion of the three options, beyond the existing Countryside Line”**. Option 1 is clearly not a viable option for Waterloo Region, as it would breach the Countryside Line. The Countryside Line must be held intact if we are to build sustainable, connected communities that protect our groundwater and our farms.

When considering any urban expansion, we must remember that **there is a finite amount of land within the Countryside Line**. The report states that Community Area Option 2 “can be accommodated within the existing Countryside Line”, but that doesn’t mean it is desirable. Our goal should not be to use up land within the countryside line, just because we can — we should use only what’s necessary to accommodate growth, and preserve the countryside line for as long as possible. We shouldn’t create any new land for urban areas unless we absolutely have to.

Community Area Option 3 would result in **no urban expansion**, and would accomplish this by a relatively modest increase in overall density: 66 people and jobs per hectare (compared to 60 p+j/ha in Option 2).

Unfair characterisations of Community Area Option 3

The report claims that “The number of people that could be accommodated in new units would decrease with Option 3 as there is a greater proportion of high density units which typically have lower people per units than other building forms.”

This is inaccurate. Lower average household size is not only a function of the type of dwelling. The Region’s proposed housing policies include new language around bedroom mix, and we can use them to ensure more family-sized townhouses and apartments get built. The LNA doesn’t consider this aspect, and incorrectly assumes that the vast majority of high-density units will continue to be 1- and 2-bedrooms.

The report states that Option 2 would accommodate 248,400 people and jobs, and would need an extra 376 hectares of land. Option 3 would accommodate 247,000 people and jobs, with no land expansion. The difference in population between these two options is minimal. **To plan for**

an additional 1,400 people in Option 3, we would only have to slightly adjust the mix of 1-, 2-, 3- and 4+ bedroom units. We have the tools to ensure that high-density development includes larger bedroom sizes.

The report also states, “Option 3 may provide less choice for certain traditional housing options within grade-related housing forms within the DGA, including larger lot single-detached units, bungalows, larger townhomes, etc.”

When we speak of “less choice”, it’s important to unpack all the qualifiers in that statement. There may be less availability of single detached homes, but an Option 3 growth scenario would provide more types of townhouses, stacked towns, and walk-up apartments. Option 3 would provide a greater variety of housing forms than Option 2, so we could just as easily frame this Option as providing *more* choice!

With Option 1 and Option 2, the question is "choice for who?" A large single family home with a big backyard is a choice for a certain type of resident, but it isn't right or affordable for most. We need new types of housing that are more sustainable and affordable.

More detail needed for Employment Area options

On Employment Areas, the report states, “potential opportunities for higher Employment Area intensification (15% versus 25%) reduce the long-term need for urban Employment Area expansion by approximately 30%.”

Employment Area Option 2 considers an intensification rate of 25% (versus 15% as the current business-as-usual Option 1). **There isn’t enough detail on how we plan to achieve Employment Area Option 2**, since the LNA doesn’t list policies or incentives that would make 25% a reality.

What’s missing

Absent from this report is a discussion of financial implications of the **lifecycle cost of infrastructure**. Increased urban expansion, as with Community Area Options 1 and 2, brings with it new costs for roads, utilities, and other infrastructure. We must consider not only the initial cost to build our new sprawl, but the ongoing cost of maintenance and repair.

If new communities are built at lower densities, higher property taxes are required to maintain this infrastructure. If we build compact, walkable communities within the existing urban area, we reduce the need for expensive infrastructure and share the cost of existing infrastructure over more households.

These **financial considerations are not mentioned in section 7 of the staff report**, although they represent some of the greatest financial decisions that council will make, having a direct impact on our region's ability to finance growth.

Another issue that was not addressed in the Land Needs Assessment is how **real estate speculation**, including investment properties and people buying second, third, or fourth homes, affects the population forecasts in each Option.

Lastly, there was no consideration in the LNA for the **moratorium on development declared by the Six Nations Elected Council and the Haudenosaunee Confederacy Chiefs**. Much of Waterloo Region sits on the Haldimand tract: land that was granted to the Haudenosaunee, in a treaty which colonial governments, including the Region of Waterloo, have failed to uphold. The Haudenosaunee council of Chiefs, as well as the Six Nations band council, have declared that no development can proceed along the Haldimand Tract without the consent of the Haudenosaunee.

The Region of Waterloo's Official Plan must honour the Haldimand Treaty and respect Haudenosaunee jurisdiction over the lands and waters in our region. The LNA fails to demonstrate how this is being approached.

[Response to draft housing policies](#)

Policy 3.A.2 is updated to include "bedroom mix" in the definition of "appropriate range and mix of housing". This is a welcome change, as it allows us to address the lack of family-sized housing, particularly among new infill development.

Policy 3.A.3, which governs intensification of individual lots, changes the wording from "encourage" to "require" individual lot intensification. This is a step in the right direction, but the policy could be further strengthened by removing the words "wherever appropriate" and "other reasonable standards or criteria".

3.A.3 The Region requires Area Municipalities to permit, wherever appropriate, individual lot intensification through the addition of accessory residential units in residential neighbourhoods, where health, safety, servicing and other reasonable standards or criteria can be met.

Policy 3.A.3 mentions specific standards and criteria: health, safety, and servicing. These should be made less vague and more prescriptive. Making this policy more detailed would prevent area municipalities from imposing onerous performance standards that have hindered the development of individual lot intensification.

The need for more permissive standards on individual lot intensification becomes clearer when we look at the Draft Land Needs Assessment. When forecasting housing types, only 1% of dwellings are forecasted to be secondary units, while low-density housing is forecasted to make up 45-50% of total housing by 2051. (*Land Needs Assessment, Figures ES-1, ES-4, and ES-5*)

Policy 3.A.4 is changed to regulate condominium conversions for all rental, not just affordable rental units. This is a positive change, as it eliminates confusion around the province's affordable housing threshold which has not been a reliable indicator of actual rents in vacant units.

However, new language specifying "six or more units" is concerning. None of the rationale provided explains why tenant protections should be removed from those in buildings with less than 6 units. As an example, the National Housing Strategy and CMHC generally define commercial properties as those with more than 4 units. Regardless, condominium conversion should apply to all tenants, no matter how many units are in the property.

Furthermore, we take issue with the rationale for changing the vacancy rate threshold from three to two years. The comments explain that "there had never been a three-year consecutive vacancy rate above three percent for any unit type in any of our urban areas or townships". This is not a reason to lower the bar! In fact, this is a perfect example of how constrained the rental market is and why the condominium conversion policy is important. We should not weaken this policy by reducing the threshold for vacancy rate.

A new demolition control policy would require that redevelopment "maintains the pre-existing bedroom mix and affordability". However, it would only apply to properties with 6 or more dwelling units. This is a problem, as it leaves large swaths of Waterloo Region's affordable rental units unprotected. Particularly, it removes protections for people renting in low-rise single detached homes, duplexes, triplexes, and other forms of renovated multi-unit houses.

Redevelopments often seek lot consolidation in order to construct a new building. Each of these lots often have less than 6 units, and therefore would be exempt from the proposed demolition control policy. The language around minimum units should be dropped completely, but if it isn't, it must be updated to take into account the total displacement caused by a redevelopment project, not just a certain number of units per property.

This policy also says, "Tenant relocation and assistance should be considered." This language should be strengthened to require tenant relocation and assistance, and to provide specific standards to ensure consistent implementation across the region. We are a desirable community for new development, and we can afford to raise the bar for protecting existing tenants from displacement.

Increased tenant protection could look like requiring relocation options within the same neighbourhood, a right of return to the new development at existing rental rates, or requiring Letters of Credit to ensure that tenant compensation is actually paid. We encourage the Region

to consult with tenant advocacy groups, student unions, and neighbourhood associations to further develop policies around tenant relocation and assistance.

A new “affordable housing targets” policy and a new “priority review policy” are good tools to improve affordability in our communities. The region’s Affordable Housing Target is defined as the lower of an income-based or a market-based calculation. This definition is incredibly important for ensuring true affordability in our community, where new buildings are often marketed as “affordable” while only considering the market-based definition.

In all Official Plan policies, zoning by-laws, and incentive programs, affordability thresholds should be clearly defined and translated to a specific dollar amount for rental rates or purchase prices. In order to assist the implementation and communication of this policy, staff should specify an actual dollar value for each dwelling type (separated by built form & also by number of bedrooms) to use as the target. This number should be updated each year and will be the touchstone for any discussion about affordability in the Region.

Furthermore, the policy should include measures to ensure that any new housing built between 2019-2051 remains affordable in perpetuity.

The new alternate standards policy considers more permissive development standards such as reduced parking, reduced setbacks, reduced road allowances, and increased density. It considers these for new development of affordable housing, but these are not standards that should be explicitly tied to affordability.

Either we want to encourage car ownership or we don’t. Either a yard setback is sufficient or it isn’t. Either a road allowance is needed or it isn’t. We should pursue all of the measures in this policy — but we should pursue them across the board, not only for affordable projects.

The **new surplus land policy** considers the use of agreements and monitoring to secure affordability. This is a welcome and important approach. This policy should not only be limited to the “surplus land” section, but should also apply to all incentive programs related to affordable housing.

In addition to looking at surplus land that municipalities already own, the Official Plan should also encourage municipalities to explore land banking, that is, buying land for community benefit as a counterweight to private-sector speculation. Land banking could be funded through Infrastructure Ontario or municipal bonds.

Thank you for the opportunity to provide feedback on the Official Plan update. We welcome further discussion with staff and council in order to address the issues that we have identified in this response.

— Hold The Line Waterloo Region (connect@holdthelinewr.org)