

## MEDIA RELEASE

### **Community Organizations File Freedom of Information Requests to Discover if Developer and Speculator Pressure on Local Municipal Councils is Undermining the Countryside Line and Official Plan**

November 20, 2023

Waterloo Region - Five community groups (Keep the Greenbelt Promise, Grand River Environmental Network, Hold the Line Waterloo Region, Waterloo Region Yes In My Backyard, 50X30 Waterloo Region) are taking the unprecedented step of filing freedom of information (FOI) requests with the Region of Waterloo, City of Kitchener, and the Township of Wilmot to identify if undue pressure on municipal leaders from developers and speculators could result in the breaching of the Countryside Line urban growth boundary and unnecessary consumption of land reserves intended to last for generations. The FOI requests seek to uncover evidence of lobbying by developers and speculators, communications of officials and staff with developers and speculators, and unpublished plans and impact reports that relate to proposed Regional Official Plan (ROP) amendments.

**The five community groups have filed the FOI requests in municipalities where Mayors received over 50% of their election campaign donations from the development sector and/or where Mayors received donations from developers and speculators who now stand to gain financially if the Mayors support the ROP amendments.<sup>1</sup>**

On October 23, 2023, Minister of Municipal Affairs and Housing (MMAH), Paul Calandra, made [the unexpected announcement](#) that he would reverse his predecessor's decision to force the expansion of Waterloo Region's Countryside Line and urban growth areas, saying the decision failed to meet the test of supporting the Province's goal of building at least 1.5 million homes in a manner that maintains and reinforces public trust. On November 2, 2023, the MMAH [sent a private letter](#) that provided mayors with 35 days (deadline of December 7th) to identify changes to the Regional Official Plan (ROP) that establishes the Countryside Line and urban growth areas – all without public consultation or coordination with the Region or other area municipalities.

The MMAH has downloaded the decision of whether to amend the ROP to area mayors. This has put both Mayors and Councils under considerable pressure from developers whose land banked properties increased in value by hundreds of millions of dollars when changed from undevelopable farmland on April 10th to potential sprawling suburbs on April 11th.

This back door process undermines good planning in Waterloo Region and comes amid widespread concerns that the Province's process for selecting specific parcels for inclusion in the urban boundaries was politically motivated. These land use decisions by the provincial government, as well as those

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<sup>1</sup> Journalists are invited to email [info@greenbeltpromise.ca](mailto:info@greenbeltpromise.ca) for detailed analysis of campaign donations and links to publicly available campaign finance records.

impacting the Greenbelt, are currently the subject of ongoing investigations by the RCMP, Auditor General, and Integrity Commissioner. [Freedom of Information Act requests](#) by the environmental law charity Ecojustice have revealed that it was the MMAH's Office staff — not civil servant experts — who directed changes to municipal official plans. Only a portion of the files requested by Ecojustice have been released, and additional files about the process to amend Waterloo Region's ROP are expected.

In August of 2022, Waterloo Regional Council approved the Regional Official Plan, with all city and township mayors voting in favour of its approval. The plan was created following four years of extensive consultations and public engagement. Staff and technical experts undertook detailed studies to ensure that each municipality had enough land to exceed future housing needs. City and Township staff and council each also provided feedback to inform the process — such as the August 9, 2021 City of Kitchener Committee resolution moved by Mayor Vrbancovic that reaffirmed the City's commitment to the Countryside Line and supported the Region of Waterloo in approving the ROP. It is not possible to re-create such comprehensive engagement and expert input within the 35 days provided to area mayors by the MMAH.

Our community requires housing development to provide quality homes and liveable communities for current and future residents - but land use decisions are too important to be made behind closed doors, without due process and expert staff input, without public consultation, and in direct conflict to the decisions of our heads of council just one year ago.

In accordance with the [Municipal Freedom of Information and Protection of Privacy Act](#), the municipalities have 30 days to respond to the requests. Please see attached for a copy of the FOI requests filed. Additional FOI requests may be filed with other area municipalities as new information is discovered.

Community groups include:

- Keep the Greenbelt Promise
- Grand River Environmental Network
- Hold the Line Waterloo Region
- Waterloo Region Yes In My Backyard
- 50X30 Waterloo Region

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**Media Inquiries:**

Mike Marcolongo, Campaign Director, Small Change Fund on behalf of Greenbelt Promise campaign:  
[info@greenbeltpromise.ca](mailto:info@greenbeltpromise.ca) or 519-731-8978

**Freedom of Information Request  
to the Region of Waterloo  
November 20, 2023**

Records in relation to the Minister of Municipal Affairs and Housing's (MMAH):

- April 11, 2023 amendment of the Regional Official Plan (ROP);
- October 23, 2023 decision by the MMAH to reverse the April 11, 2023 ROP amendments; and
- November 2, 2023 letter from the MMAH titled "Announcement Impacting Provincial Decisions on Municipal Official Plans/Official Plan Amendments".

Requested records include:

- All requests from landowners or their representatives, affiliates, family members or agents to the Chair's Office and/or Regional Staff to modify the ROP;
- All requests from RBJ Schlegel (including, but not limited to, "R-B-J SCHLEGEL HOLDINGS INC.") and Activa group of companies or their representatives, affiliates, family members or agents to the Chair's Office and/or Regional Staff to modify the ROP;
- All requests from the owners of the property described as LT 144 GERMAN COMPANY TRACT KITCHENER; PT LT 143 GERMAN COMPANY TRACT KITCHENER AS IN 368142, T/W 368142 PARTIALLY RELEASED BY WR154625; KITCHENER (herein referred to as "Big Spring Farms") or its representatives, affiliates, family members or agents to the Chair's Office and/or Regional Staff to modify the ROP;
- All requests from individuals who made contributions to the election campaign of the Chair and/or Councillors to modify the ROP;
- All documents from the Chair's Office and/or Regional Staff regarding the modifications and changes to the ROP;
- All directions from the Chair's Office to Regional Staff regarding requests from landowners, RBJ Schlegel, Activa group of companies, or the owners of Big Spring Farms, or regarding requests from their (inclusive of landowners, Activa group of companies, RBJ Schlegel, and the owners of Big Spring Farms) representatives, affiliates, family members or agents regarding the modifications and changes to the ROP.
- All draft/redlined official plan policies;
- All draft/redlined official plan mapping;
- All Regional Staff reports relating to the modifications or changes to the ROP;
- All documents relating to the environmental, agricultural, and/or drinking water impacts of the modifications and changes to the ROP;

This request does not include publicly available documentation or purely scheduling correspondence.

Requested documentation includes any type of document and in all formats including emails, USB drives and SharePoint or another file sharing service, meeting minutes, draft and final reports, and notes (including hand written notes).

The start date is January 1, 2023 to present (November 20, 2023).

**Freedom of Information Request  
to the City of Kitchener  
November 20, 2023**

Records in relation to the Minister of Municipal Affairs and Housing's (MMAH):

- April 11, 2023 amendment of the Regional Official Plan (ROP);
- October 23, 2023 decision by the MMAH to reverse the April 11, 2023 ROP amendments; and
- November 2, 2023 letter from the MMAH titled "Announcement Impacting Provincial Decisions on Municipal Official Plans/Official Plan Amendments".

Requested records include:

- All requests from landowners or their representatives, affiliates, family members or agents to the Mayor's Office and/or City Staff to modify the ROP;
- All requests from RBJ Schlegel (including, but not limited to, "R-B-J SCHLEGEL HOLDINGS INC.") and Activa group of companies or their representatives, affiliates, family members or agents to the Mayor's Office and/or City Staff to modify the ROP;
- All requests from the owners of the property described as LT 144 GERMAN COMPANY TRACT KITCHENER; PT LT 143 GERMAN COMPANY TRACT KITCHENER AS IN 368142, T/W 368142 PARTIALLY RELEASED BY WR154625; KITCHENER (herein referred to as "Big Spring Farms") or its representatives, affiliates, family members or agents to the Mayor's Office and/or City Staff to modify the ROP;
- All requests from individuals who made contributions to the election campaign of the Mayor and/or Councillors to modify the ROP;
- All documents from the Mayor's Office and/or City Staff regarding the modifications and changes to the ROP;
- All directions from the Mayor's Office to City Staff regarding requests from landowners, RBJ Schlegel, Activa group of companies, or the owners of Big Spring Farms; or regarding requests from their (inclusive of landowners, RBJ Schlegel, Activa group of companies, and the owners of Big Spring Farms) representatives, affiliates, family members or agents regarding the modifications and changes to the ROP.
- All draft/redlined official plan policies;
- All draft/redlined official plan mapping;
- All City Staff reports relating to the modifications or changes to the ROP;
- All documents relating to the environmental, agricultural, and/or drinking water impacts of the modifications and changes to the ROP;

This request does not include publicly available documentation or purely scheduling correspondence.

Requested documentation includes any type of document and in all formats including emails, USB drives and SharePoint or another file sharing service, meeting minutes, draft and final reports, and notes (including hand written notes).

The start date is January 1, 2023 to present (November 20, 2023).

**Freedom of Information Request  
to the Township of Wilmot  
November 20, 2023**

Records in relation to the Minister of Municipal Affairs and Housing's (MMAH):

- April 11, 2023 amendment of the Regional Official Plan (ROP);
- October 23, 2023 decision by the MMAH to reverse the April 11, 2023 ROP amendments; and
- November 2, 2023 letter from the MMAH titled "Announcement Impacting Provincial Decisions on Municipal Official Plans/Official Plan Amendments".

Requested records include:

- All requests from landowners or their representatives, affiliates, family members or agents to the Mayor's Office and/or Township Staff to modify the ROP;
- All requests from RBJ Schlegel (including, but not limited to, "R-B-J SCHLEGEL HOLDINGS INC.") or its representatives, affiliates, family members or agents to the Mayor's Office and/or Township Staff to modify the ROP;
- All requests from individuals who made contributions to the election campaign of the Mayor and/or Councillors to modify the ROP;
- All documents from the Mayor's Office and/or Township Staff regarding the modifications and changes to the ROP;
- All directions from the Mayor's Office to Township Staff regarding requests from landowners or their representatives, affiliates, family members or agents regarding the modifications and changes to the ROP.
- All draft/redlined official plan policies;
- All draft/redlined official plan mapping;
- All Township Staff reports relating to the modifications or changes to the ROP;
- All documents relating to the environmental, agricultural, and/or drinking water impacts of the modifications and changes to the ROP;

This request does not include publicly available documentation or purely scheduling correspondence.

Requested documentation includes any type of document and in all formats including emails, USB drives and SharePoint or another file sharing service, meeting minutes, draft and final reports, and notes (including hand written notes).

The start date is January 1, 2023 to present (November 20, 2023).