

October 7, 2022

Wendy Fisher, Senior Development Planner
Planning Approvals, Integrated Planning & Public Works Department
City of Waterloo
100 Regina Street South,
Waterloo, ON, N2J 4A8

Dear Ms. Fisher:

**RE: Private Employment Lands Conversion Assessment Report
475 and 485 King Street North, Waterloo, Ontario
OUR FILE: 8027G**

On behalf of Drewlo Holdings Inc., and in support of the OPA / ZBA application submission for 475 King Street North, we are pleased to provide this Private Employment Lands Conversion Assessment Report (PELCAR) as it relates to the lands municipally addressed as 475 and 485 King Street North in the City of Waterloo (the 'subject lands').

As the development proposal includes a mix of uses, including residential uses, on lands designated Employment in the City of Waterloo Official Plan, in advance of the final approval and implementation of the Region's MCR and new Regional Official Plan, the application is considered to be a privately initiated employment land conversion. As such, policies of the Provincial Policy Statement, Growth Plan, and City of Waterloo Official Plan are required to be addressed.

SUBJECT LANDS AND PROPOSED DEVELOPMENT

The subject lands have a total area of approximately 6.5 hectares and have frontage on both King Street North Service Road and Weber Street in the City of Waterloo.

The subject lands are located south of, and in close proximity to Highway 85 (Conestoga Expressway) and the ION rapid transit route. The subject lands are located within walking distance of the Conestoga ION Station. The Growth Plan defines a Major Transit Station (MTSA) as the *area around any existing or planned higher order transit station or stop within a settlement area, generally defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.*

A trail connection through the subject lands between Weber Street and King Street North provides connections to the municipal sidewalk on King Street North which provides connections to the ION Station.

The subject lands are in close proximity to a range of surrounding land uses, such as, industrial uses to the north and a range of commercial uses located on King Street North and residential uses to the east and west. The subject lands currently contain the former Waterloo Inn hotel and conference centre on the eastern portion of the site. The westerly portion of the site is currently vacant. The site is shown on the context plan on the following page.

The proposed development is for a mixed use development containing residential, office and commercial uses, and summarized as follows:

- Two office buildings are proposed along the western edge of the property adjacent to Weber Street.
- Eight residential high-rise buildings are proposed, ranging in height from 16 to 28 storeys. All residential buildings sit atop a podium with a mix of townhouses, amenity space, parking and / or commercial uses, with a proposed density of 448 bedrooms per hectare.
- Commercial uses in the form of podium space and a stand-alone building are located near the King Street North frontage to create a mixed use portion of the subject lands with active frontages along King Street North. Approximately 4,000 m² (43, 000 sq. ft.) of commercial space is proposed, which has been informed by a Market Study prepared by CBRE in November, 2020.

EMPLOYMENT CONVERSION REQUEST AND RATIONALE

A mixed use redevelopment will provide for a greater range of uses and contribute to the development of a complete community in the City of Waterloo. The subject lands are strategically located in proximity to Highway 85, and major transit routes including ION to provide connections throughout the Region. Alternative land uses including commercial and residential uses will provide for transit supportive development and densities.

The western portion of the subject lands (3.4 hectares) are designated Employment in the City of Waterloo Official Plan and therefore are subject to a privately-initiated employment land conversion. Therefore, this Report is intended to address the Private Employment Land Conversion Assessment criteria as per Policy 2.2.5.10 of the Growth Plan and Policy 1.3.2.5 of the PPS. As detailed in the following table, the criteria are achieved:

Criteria	Response
<p>There is a need for the conversion; (Growth Plan Policy 2.2.5.9 a)</p>	<ul style="list-style-type: none"> • The subject site presents a unique opportunity to for a large scale mixed-use redevelopment within the built boundary of the City of Waterloo to contribute to the development of a complete community, the Region’s density and intensification targets and will significantly contribute to the City’s rental housing supply. • The redevelopment of the proposed development will allow for the efficient use of land and resources. • There are limited opportunities to provide a diverse range and mix of housing types and uses in the City of Waterloo over the planning horizon of the current Growth Plan until 2051. The development of these lands as a mixed use community would help to address this need. • While the lands are not within an MTSA, they are in close proximity to the Conestoga, Northfield and R&T Park Station Areas, and within walking distance of the ION and several bus routes.
<p>The lands are not required over the horizon of this Plan for the employment purposes for which they are designated (Growth Plan Policy 2.2.5.9 b)</p>	<ul style="list-style-type: none"> • The Growth Plan forecasts recognize changes in the way office space is being used. Increased work from home will reduce the need for more office space. • There are other and perhaps preferred opportunities to accommodate major office development within the Region, including MTSA’s, Major Nodes, Major Corridors and Provincially Significant Employment Zones that have been identified by the province and Region for long term protection. • The Region did not identify these lands are Protected Employment.
<p>The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan (Growth Plan Policy 2.2.5.9 c)</p>	<ul style="list-style-type: none"> • The Region did not identify these lands are Protected Employment. • The redevelopment plans for the subject lands contemplate a range of uses which will generate employment opportunities, including office, commercial, retail and personal service uses. • The addition of residential uses will not preclude employment uses, and will allow for a comprehensive mixed use development with a significant number of both residents and jobs across the subject lands, consistent with the intent of the Growth Plan. • There are other and perhaps preferred opportunities to accommodate major office development within the Region, including MTSA’s, Major Nodes, Major Corridors and Provincially Significant Employment Zones that have been identified by the province for long term protection.

<p>The proposed uses would not adversely affect the overall viability of the employment area or achievement of the minimum intensification and density targets in this Plan; (Growth Plan Policy 2.2.5.9.d)</p>	<ul style="list-style-type: none"> • The subject lands are a single large parcel in the Built-Up Area in the City of Waterloo. • The lands offer a unique opportunity for an appropriate land use transition with the residential and commercial lands to the south and the west. • The size and location of the subject lands also allows opportunity to locate potentially sensitive land uses away from the existing employment areas to the north, and will not fragment the existing employment area as the subject lands function as an edge parcel in the overall area which is in transition to other uses. • No adverse land use compatibility impacts are anticipated as part of the proposed development. • The Growth Plan establishes a minimum intensification target of 50% which does not apply to employment lands. • The Growth Plan requires areas in MTSA's served by light rail transit to obtain a minimum density target of 160 residents and jobs combined per hectare. The establishment of non-employment uses at this location would significantly contribute to the overall intensification and density targets in support of surrounding MTSA's, given the size of the subject lands and proposed mix of uses. • The development of the subject lands is proposed to have a density of approximately 450 bedrooms per hectare, which will exceed minimum density targets, and supports transit.
<p>There are existing or planned infrastructure and public service facilities to accommodate the proposed uses; (Growth Plan Policy 2.2.5.9.e)</p>	<ul style="list-style-type: none"> • The subject lands are currently serviced by the required infrastructure and public service facilities as they have been previously developed, and are located in a Built-Up Area of the City of Waterloo. • The lands are in proximity of a major transportation infrastructure investment, the ION Light Rail Transit corridor, and Highway 85 / Conestoga Parkway • The development of the subject lands can be adequately serviced as confirmed in the FSR prepared by MTE.
<p>Overall consistency with the goals and intent of the City of Waterloo's Official Plan</p>	<ul style="list-style-type: none"> • The development of these lands with a mix of uses will allow for the most efficient use of land and resources, and contribute to the Region and City objectives of development complete communities, which are transit supportive. • The proposed development will also assist in achieving affordable housing targets, by providing a significant number of residential rental units. • Given the sites proximity to a major transit investment, maintaining these lands for employment purposes as currently designated does not allow the site to meet its full potential for

	<p>development density as typically sites in proximity to an MTSA are designated to allow for increased uses and/or density. Based on the location of the subject lands, we do not believe that they should be maintained for the same purposes that they are designated today.</p> <ul style="list-style-type: none"> • The proposal will align development with the Transit Oriented Development Policies. • The development of the subject lands is proposed to have a density of approximately 450 bedrooms per hectare, which will exceed minimum density targets, and support transit.
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The above analysis, suggests that consideration should be given to redesignating the subject lands to allow for a broader mix and range of uses, including residential and commercial uses, in addition to the existing employment permissions.

It should also be noted that these lands are not located within a Provincially Significant Employment Zone.

REGION OF WATERLOO – RECOMMENDATION FOR CONVERSION

As part of the Regional Official Plan Review process, the Region completed a Municipal Comprehensive Review (MCR), including consideration of employment land conversion requests.

In July 2020, MHBC Planning made a formal submission to the Region for consideration of the subject lands for conversion to permit a mixed use development, which is appended to this report. As part of the Region’s assessment, the lands were recommended for conversion, and Regional Council endorsed the recommendation in April 2021.

On August 18, 2022, Regional Council passed By-law No. 22-038, to adopt Regional Official Plan Amendment (ROPA No. 6), for the Region’s Official Plan to 2051. The purpose of the new Regional Official Plan is to accommodate Waterloo Region’s forecasted population and employment growth to 2051 and implement A Place to Grow – Growth Plan (2020) and the Provincial Policy Statement (2020) and the Planning Act. As of the date of this report, ROPA No. 6 has not yet been adopted by the Ministry of Municipal Affairs and Housing (MMAH).

The Region in their evaluation provided the following rationale for recommending conversion:

- Site is part of employment land that protrudes into non-employment uses
- Site is surrounded by non-employment designations to the west (residential) and to the east (commercial), and the existing office to the south
- Non-employment uses on the site would maximize the development potential of the site, due to compatibility constraints with the adjacent residential neighbourhood to the west if the site was developed as employment

- Conversion would impact adjacent employment lands to the south along Weber St., which staff also recommend to be removed from the Regional Employment Area along with the requested site.

The subject lands are not identified as Protected Employment in the Region's Official Plan that has been adopted by Regional Council.

SUMMARY

In summary, our client's conversion request is supported by the subject lands unique location attributes and the existing provincial and regional policy context. Key points in support of this conversion request are as follows:

- The Growth Plan permits the conversion of lands not only within the context of a municipal comprehensive review as currently being undertaken by the Region, but also prior to the next Municipal Comprehensive Review;
- The location of the subject lands in the existing Built-Up Area and relative to the Conestoga Station makes the lands ideally situated for a large-scale, mixed-use redevelopment with a compact form that increases walkability and provides transit supportive densities;
- The lands satisfy the evaluation criteria of both the Growth Plan and the Regional Official Plan for conversion as outlined above; and,
- The subject lands present a unique opportunity to redevelop a large, underutilized property within the Urban Boundary to create a vibrant, mixed-use community, which will contribute to the overall density and intensification targets identified in the Growth Plan, Regional Official Plan and City of Waterloo Official Plan.

The information provided herein provides justification as to why the subject lands are appropriate for consideration for conversion to non-employment uses by the City of Waterloo. We ask that the lands be considered for conversion through the OPA / ZBA application.

Note that a copy of MHBC's submission to the Region of Waterloo is appended to this Report as supplemental information. Please contact the undersigned if you require anything additional.

Yours Truly,

MHBC



Pierre Chauvin, MA, MCIP, RPP
Partner



Stephanie Mirtitsch, BES, MCIP, RPP
Associate

July 28, 2020

Alyssa Bridge
Principal Planner
Planning, Development and Legislative Services
Region of Waterloo
150 Frederick Street
Kitchener, Ontario N2G 4J3

[via email: ABridge@regionofwaterloo.ca]

Dear Ms. Bridge:

**RE: Employment Conversion – Regional Official Plan Review
475 and 485 King Street North, Waterloo, Ontario
OUR FILE: 8027G**

On behalf of Drewlo Holdings Inc., we are pleased to provide this letter as it relates to their lands municipally addressed as 475 and 485 King Street North in the City of Waterloo (the 'subject lands').

We understand the Region of Waterloo is currently initiating a planning exercise to reassess employment lands through the upcoming Regional Official Plan Review. This letter has been prepared to demonstrate that consideration should be given to remove the subject lands from the current employment designation. A mixed use redevelopment would provide for a more efficient use of land, by allowing for a greater range of uses and contribute to the development of a complete community in the City of Waterloo.

This letter has been updated from our initial letter submitted in September, 2019 to reflect the Regional Official Plan Review process, and Regional Report No. PDL-CPL-20-19, which was released on June 16, 2020. This report outlines the nine criteria that are required to be assessed as part of the employment conversion process, as part of the Municipal Comprehensive Review (MCR).

SUBJECT LANDS

The subject lands have a total area of approximately 7.556 hectares and has frontage on both King Street North Service Road and Weber Street in the City of Waterloo. The subject lands are located south of, and in close proximity to Highway 85 (Conestoga Expressway) and the ION rapid transit route. The subject lands are located within walking distance of the Conestoga ION Station. The Growth Plan defines a Major Transit Station (MTSA) as the *area around any existing or planned higher order transit station or stop within a settlement area, generally defined as the area within an approximate 500 to 78000 metre radius of a transit station, representing about a 10-minute walk.*

A trail connection through the subject lands between Weber Street and King Street North provides connections to the municipal sidewalk on King Street North which provides connections to the ION Station.

The subject lands are in close proximity to a range of surrounding land uses, such as, industrial uses to the north and a range of commercial uses located on King Street North and residential uses to the east and west.

The subject lands currently contain the Inn of Waterloo Inn hotel and conference centre on the eastern portion of the site. The westerly portion of the site is currently vacant. The site is shown on the context plan on the following page.

PROJECT PROPOSAL

Although the subject lands are currently being utilized for a hotel use, our client is in the process of preparing preliminary development plans for a mixed-use redevelopment for the entire site. The proposed development is contemplated to include a mix of residential, office and commercial uses.

A mixed use redevelopment would provide for a greater range of uses and contribute to the development of a complete community in the City of Waterloo. The subject lands are strategically located in proximity to Highway 85, and major transit routes including ION to provide connections throughout the Region. Alternative land uses including commercial and residential uses would provide for transit supportive development and densities in the form of residents and jobs as outlined in Section 2.D.2 Transit Oriented Development Policies of the Region of Waterloo.

RATIONALE FOR EMPLOYMENT CONVERSION

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)

The Growth Plan for the Greater Golden Horseshoe (the 'Growth Plan') was released by the Province of Ontario and was brought into full force and effect on May 16, 2019. It attempts to address several challenges to employment planning in the Province. The amendment to the 2017 plan includes numerous changes to the planning landscape, including the ability to convert employment area designations prior to a Municipal Comprehensive Review, the identification of Provincially Significant Employment Zones, and early conversion of lands outside of the Provincially Significant Employment Zones. The subject lands are not within a Provincially Significant Employment Zone.

Of note, the proposed amendment allows for lands within existing designated employment areas to be converted to non-employment designations provided the conversion has demonstrated need, does not adversely affect the viability of the employment area, and maintains a significant number of jobs on the lands to be converted. Additionally, the Growth Plan states that municipalities should provide an appropriate interface between employment areas and adjacent non-employment areas to ensure land use compatibility.

Current Policy Framework for the Subject Lands

Region of Waterloo Official Plan

The subject lands are designated as 'Urban Area- Built Up Area' in the Region of Waterloo Official Plan. These lands are intended to accommodate the majority of the Region's growth within the planning horizon of the Plan. Section 2.D of the Regional Official Plan identifies that this area has the greatest capacity to accommodate growth and serve as the primary focus for employment, housing, cultural and recreational opportunities in the Region. The majority of this growth is to be directed to Urban Growth Centres, Major Transit Station Areas, Reurbanization Corridors, Major Local Nodes and Urban Designated Greenfield Areas.

Map 5a of the Regional Official Plan identifies King Street North, adjacent to the subject lands, as an Existing Transit Corridor. King Street and Weber Street in proximity to the site are both identified as 'Existing Regional Roads' on Map 5b of the Regional Official Plan.

King Street between University Avenue and Conestoga Mall is identified as 'Potential ION Stage 3' Rapid Transit route in the 2018 Transportation Master Plan.

City of Waterloo Official Plan

The subject lands are split-designated **Commercial (Corridor Commercial)** and **Employment (Business Employment)** in the City of Waterloo Official Plan (Schedule A1) as shown on the context plan below. The easterly portion of the subject lands are within a designated Major Corridor, and designated for a range of commercial uses, and are designated High Density on Schedule B1 of the Official Plan. The easterly portion of the lands are also designated **Specific Provision Area 44 (SPA 44)**, which contemplates residential land uses subject to a zoning by-law amendment.

The westerly portion of the subject lands are located within the Business Employment Area as designated by the City of Waterloo Official Plan. This portion is within a Minor Corridor and designated Medium Density on Schedule B1 of the Official Plan. **This letter is intended to focus on the Business Employment Area portion of the site, or the westerly portion of the subject lands.**

The predominant land use in Business Employment Areas is envisioned to be prestige office uses. Lands within this designation are generally on the periphery of employment areas, and are intended to serve as a buffer between traditional industrial uses and sensitive uses, while accommodating office development along planned or existing transportation routes, and in higher density destinations such as designated nodes or corridors.

Further, the subject lands are located within walking distance of Conestoga Station, a station on the Light Rail Transit Route in Waterloo Region, as shown below:

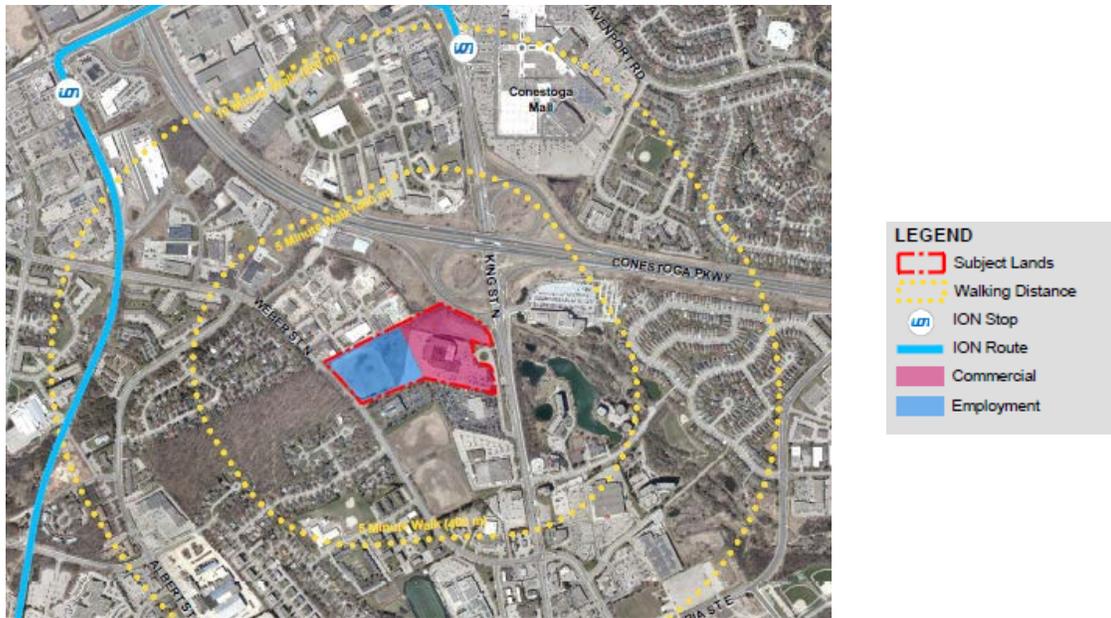


Figure 1: Context Plan

The City of Waterloo has *completed* a Station Area Plan for Conestoga Station. The Station Area Plan contributes to the Regional and City objective of shifting towards transit oriented developments.

Due to the aforementioned, the subject lands are ideally suited for consideration of alternate land uses, such as commercial/office/residential mixed-uses, as opposed to the limited employment uses permitted in the current designation.

The City of Waterloo Official Plan states that conversion requests are subject to completion of a municipal comprehensive review initiated by the Region and must satisfy a series of tests. Due to recent changes in Provincial Policy, employment conversions are permitted in advance of a Municipal Comprehensive Review, subject to a similar series of tests, as detailed below. Policy 10.3.8 of the Official Plan also identifies that to support objectives in relation to the development of the LRT, and to establish vibrant, mixed-use, employment focused MTSAs, priority consideration for conversion of employment areas through a Municipal Comprehensive Review should be given to:

- Properties that are located within areas identified as Potential Transition Areas on Schedule J – Station Areas, and are located adjacent to a higher-order transit corridor, provided further that:
 - Portions of properties that have direct access to active or convertible frontage areas are preferred locations for mixed-use developments relative to properties or portions of properties that do not have such access; and,
 - For the purposes of this section, higher-order transit corridors include the ION LRT line shown on Schedule 'J' – Station Areas of this Plan in addition to the existing and planned transit corridors shown on Map 5a – Regional Transit Network of the Regional Official Plan.

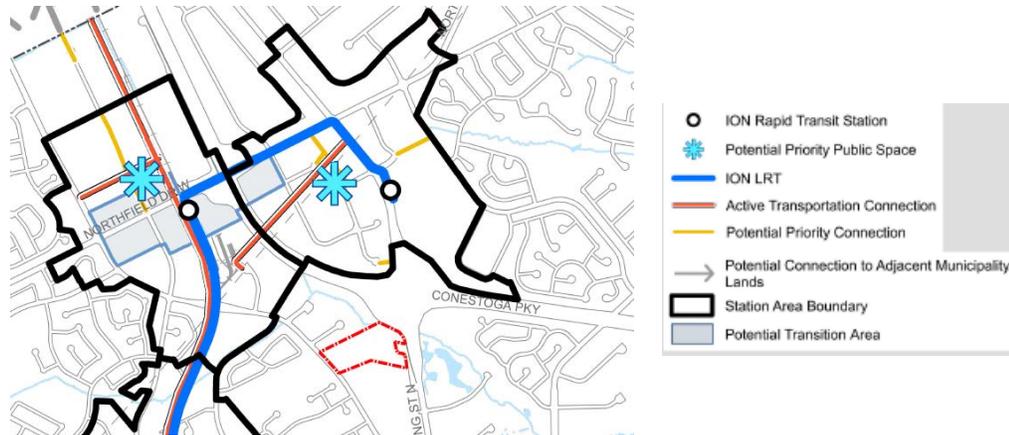


Figure 2: City of Waterloo Official Plan Schedule J - Station Areas

The subject lands are not located within the Station Areas shown on Schedule 'J' of the Official Plan, as shown above, or the Regional MTSA's shown in the June, 2020 report, however, the lands are located within walking distance of Conestoga Station.

- Where an employment land conversion occurs through the municipal comprehensive review initiated by the Region, the implementing Official Plan framework to facilitate the conversion will include:
 - appropriate minimum employment densities required to be developed in conjunction with non-employment uses;
 - built form requirements, including requirements for developments to feature mixed-use buildings;
 - the permitted heights and densities;
 - requirements to ensure that any new sensitive uses are appropriately phased based on the surrounding land use context. Permission for sensitive uses may require the application of holding provisions.

The above noted tests are similar to the tests in the Growth Plan, which are assessed below.

- New residential development shall be discouraged from locating within close proximity to land designated Flexible Industrial due to possible adverse effects on the sensitive residential land use by the industrial operations contemplated within the Flexible Industrial designation.
 - Where new employment uses or the expansion of employment uses are constructed near residential areas, the City will require that applicable Provincial regulations, guidelines and best practices are met or adhered to. Such proposals shall be referred to the Ministry to determine if a Certificate of Approval under the Environmental Protection Act is necessary.

A portion of lands immediately to the north of the subject lands are designated 'Flexible Industrial' on Schedule A-2 of the Official Plan. We understand that any redevelopment to more sensitive uses, including residential uses, will require a design that is compatible with the surrounding land uses, and also be subject to Provincial regulations and land use compatibility analysis through *Planning Act* applications.

The Business Employment designation contemplates a wide range of permitted uses, including but not limited to, offices, medical clinics, data centres, training facilities, printing and publishing. The designation also contemplates that these areas may be zoned to permit ancillary uses such as banks and financial services, child care centres, commercial recreation uses and restaurants.

In summary, the Business Employment designation contemplates a wide range of 'light industrial' and office uses, as well as ancillary commercial uses.

While these lands have not been formally identified as part of the Conestoga Station Study Area, the subject lands are located within a 10 minute walk to the Conestoga Light Rail station. Throughout the Growth Plan (2019), and specifically within Section 2.2.1, the Province of Ontario directs upper-tier municipalities to complete integrated planning for the purpose of optimizing advancements in public transit. The large investment into public transportation presents a unique opportunity to develop a mix of uses in compact built forms surrounding light rail stations to provide transit supportive densities, to improve walkability while reducing reliance on private automobile use. **We believe City staff should consider this area as being within the Conestoga Study Area because the lands could act as a transition from the employment lands to the north, the residential lands to the west, and to the range of commercial land uses which are existing and planned along King Street North.**

Based on the above reasoning, the subject lands should be removed from their current Business Employment designation to permit a range of uses and align with the directives of the Transit Oriented Development framework outlined by the Region of Waterloo.

Conversion Request and Analysis

Drewlo Holdings Inc. wish to formally request the conversion of the subject lands in the Region of Waterloo Official Plan and the City of Waterloo Official Plan from the current Business Employment Area designation to a designation which permits a mix of commercial and residential land uses. This would advance the Provincial policy directives aimed at increasing density and promoting a range of uses within close proximity of a higher order transit route. The addition of non-residential uses would facilitate a mixed-use development for the subject lands as a whole, and would be consistent with the permissions for the easterly portion of the property and allow for a comprehensive development.

The landowners are not currently proposing a specific designation for the subject lands, but would like consideration from the Region of Waterloo for an employment conversion. This is supported by the proximity of the lands to the Conestoga Station, as well as the range and mix of land uses which exist surrounding the subject lands.

Policy 2.2.5.9 of the Growth Plan permits the conversion of lands in employment areas to non-employment uses through a municipal comprehensive review where it has been demonstrated that a specific set of criteria are met. The Region has also identified three criteria which are required to be assessed, in addition to the Growth Plan criteria.

As outlined in the following table, those criteria are met in the case of the subject lands:

Growth Plan (2019) Criteria	Response
Criteria 1. There is a need for the conversion; (2.2.5.9 a)	<ul style="list-style-type: none"> • The subject site presents a unique opportunity to for a large scale mixed-use redevelopment within the built boundary of the City of Waterloo to contribute to the development of a complete community, the Region’s density and intensification targets and will significantly contribute to the City’s rental housing supply. • The proposal would align development with the Transit Oriented Development Policies that have been established by the Region of Waterloo and provide for a unique opportunity • The redevelopment of the proposed development will have consideration for land use compatibility, and will allow for the efficient use of land. There are limited opportunities to provide a diverse range and mix of housing types and uses in the City of Waterloo over the planning horizon of the current Growth Plan until 2051. The development of these lands as a mixed use community would help to address this need. • While the lands are not within an MTSA, they are in close proximity to the Conestoga, Northfield and R&T Park Station Areas, and within walking distance of the ION and several bus routes.
Criteria 2. The lands are not required over the horizon of the Growth Plan for the employment purposes for which they are designated (2.2.5.9 b)	<ul style="list-style-type: none"> • The Growth Plan forecasts recognize changes in the way office space is being used. Increased work from home would reduce the need for more office space. • There are other and perhaps preferred opportunities to accommodate major office development within the Region, including MTSAs, Major Nodes, Major Corridors and Provincially Significant Employment Zones that have been identified by the province for long term protection. • The Region is undertaking a land needs assessment based on the provincial methodology, which will identify land requirements.
Criteria 3. The Region and Area Municipalities will maintain sufficient lands to accommodate forecasted employment growth to the horizon of the Growth Plans (2.2.5.9 c)	<ul style="list-style-type: none"> • The Region is undertaking a land needs assessment based on the provincial methodology, which will identify land requirements. • The redevelopment plans for the subject lands contemplate a range of uses which will generate employment opportunities, including office, retail and personal service uses. • The addition of residential uses will not preclude employment uses, and will allow for a comprehensive mixed use development with a significant number of both residents and jobs across the subject lands, consistent with the intent of the Growth Plan. • There are other and perhaps preferred opportunities to accommodate major office development within the Region, including MTSAs, Major Nodes, Major Corridors and Provincially Significant Employment Zones that have been identified by the province for long term protection.
Criteria 4. The proposed uses would not adversely	<ul style="list-style-type: none"> • The subject lands are a single large parcel in the Built-Up Area in the City of Waterloo.

affect the overall viability of the employment area; (2.2.5.9.d)	<ul style="list-style-type: none"> • The lands offer a unique opportunity for an appropriate land use transition with the residential and commercial lands to the south and the west. • The size and location of the subject lands also allows opportunity to locate potentially sensitive land uses away from the existing employment areas to the north, and will not fragment the existing employment area as the subject lands function as an edge parcel in the overall area. • Land use compatibility analysis will be required as part of any future <i>Planning Act</i> applications for the subject lands.
Criteria 5. The proposal would not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other Policies of this Plan; (2.2.5.9.d)	<ul style="list-style-type: none"> • The Growth Plan establishes a minimum intensification target of 50% which does not apply to employment lands. • The Growth Plan requires areas in MTSAs served by light rail transit to obtain a minimum density target of 160 residents and jobs combined per hectare. The establishment of non-employment uses at this location would significantly contribute to the overall intensification and density targets in support of surrounding MTSAs, given the size of the subject lands and proposed mix of uses. The development of the subject lands can be planned in a manner that exceed minimum density targets, and supports transit and is compatible with the surrounding uses.
Criteria 6. There are existing or planned infrastructure and public service facilities to accommodate the proposed uses; (2.2.5.9.e)	<ul style="list-style-type: none"> • The subject lands are currently serviced by municipal infrastructure and public service facilities as they have been previously developed. • The lands are in proximity of a major transportation infrastructure investment, the ION Light Rail Transit corridor, and Highway 85 / Conestoga Parkway • Any increase in density would be subject to a review of the current servicing capacity, as part of a future <i>Planning Act</i> application.

The June, 2020 report has identified three additional criteria that are required to be assessed, which are as follows:

Additional Regional Criteria (2020)	Response
Criteria 7. Cross-jurisdictional issues have been addressed	<ul style="list-style-type: none"> • There are no cross-jurisdictional issues anticipated with this conversion request, as the subject lands do not border any other municipalities.
Criteria 8. The site does not have particular or special employment use appeal based on its proximity to major transportation infrastructure	<ul style="list-style-type: none"> • The subject lands do not have direct frontage or access to a major good movement corridor. Vehicular access to King Street is restricted to a service entrance owned by the City of Waterloo. • Higher density employment uses such as major office, are particularly well suited in locations served by higher order transit, such as Urban Growth Centres and Major Transit Station Areas, which the subject lands is not located within.

<p>Criteria 9. The conversion shall support existing or planned Regional or Area Municipal planning objectives</p>	<ul style="list-style-type: none"> • The subject lands are currently serviced by the required infrastructure and public service facilities as they have been previously developed, and are located in a Built-Up Area of the City of Waterloo. The lands are also in proximity of a major transportation infrastructure investment, the ION Light Rail Transit corridor. • The development of these lands with a mix of uses will allow for the most efficient use of land and resources, and contribute to the Region and City objectives of development complete communities, which are transit supportive. The proposed development will also assist in achieving affordable housing targets, by providing a significant number of residential rental units. • Given the sites proximity to a major transit investment, maintaining these lands for employment purposes as currently designated does not allow the site to meet its full potential for development density as typically sites in proximity to an MTSA are designated to allow for increased uses and/or density. Based on the location of the subject lands, we do not believe that they should be maintained for the same purposes that they are designated today.
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The above analysis, suggests that consideration should be given to redesignating the subject lands to allow for a broader mix and range of uses, including residential and commercial uses, in addition to the existing employment permissions. Future development on the site is envisioned to consist of a mix of residential, commercial and office type uses within a compact built form that will contribute to a complete community and developed at a density that is transit supportive.

It should also be noted that these lands are not located within a Provincially Significant Employment Zone.

Summary/Conclusion

In summary, our client’s conversion request is supported by the subject lands’ unique location attributes and the existing provincial and regional policy context. Key points in support of this conversion request are as follows:

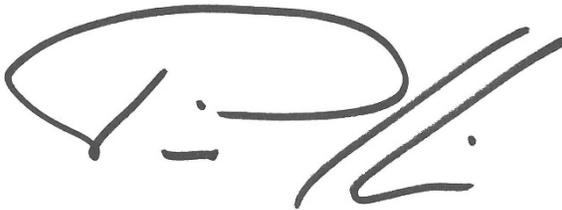
- The Growth Plan permits the conversion of lands not only within the context of a municipal comprehensive review as currently being undertaken by the Region, but also prior to the next Municipal Comprehensive Review;
- The location of the subject lands in the existing Built-Up Area and relative to the Conestoga Station makes the lands ideally situated for a large-scale, mixed-use redevelopment with a compact form that increases walkability and provides transit supportive densities;
- The lands satisfy the evaluation criteria of both the Growth Plan and the Regional Official Plan for conversion as outlined above; and,
- The subject lands present a unique opportunity to redevelop a large, underutilized property within the Urban Boundary to create a vibrant, mixed-use community, which will contribute to the overall density and intensification targets identified in the Growth Plan, Regional Official Plan and City of Waterloo Official Plan.

The information provided herein provides an updated high level summary and justification as to why the subject lands are appropriate for consideration for conversion to non-employment uses by the Region of Waterloo. We ask that the lands not be identified as Employment Area in the updated ROP.

We look forward to working with you through this process, and are happy to meet to discuss this opportunity further. Please contact the undersigned if you require anything additional.

Thank you,

MHBC

A handwritten signature in black ink, appearing to be 'P. Chauvin', with a large, sweeping initial 'P' and a long horizontal stroke.

Pierre Chauvin, MA, MCIP, RPP
Partner

A handwritten signature in black ink, appearing to be 'S. Mirtitsch', written in a cursive style.

Stephanie Mirtitsch, BES, MCIP, RPP
Planner

cc. George Bikas, Drewlo Holdings