

December 23, 2022

Hon. Stephen Clark – Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
M7A 2J3

Dear Mr. Clark:

**RE: Employment Conversion – Amendment to Region of Waterloo Official Plan Amendment 6,
ERO Number 019-5952, Ministry Reference Number 30-OP-222206
Elgin Street North, City of Cambridge, Ontario
OUR FILE: 18407D**

On behalf of our client, 1648259 Ontario Inc., we are pleased to provide this letter as it relates to their lands on Elgin Street North in the City of Cambridge (hereinafter referred to as the 'subject lands').

We understand the Ministry of Municipal Affairs and Housing is accepting comments on Official Plan Amendment 6 to the Region of Waterloo Official Plan before a decision is made by the Minister. We would like to reaffirm our request for an employment conversion on the subject lands as part of Regional Official Plan Amendment 6, based on the following rationale and evaluation of the Growth Plan criteria identified in Section 2.2.5.9 of the Growth Plan (2020).

Specifically, our client wishes to formally **request that the subject lands not be identified as an Employment Area on Map 3 of ROPA 6**, in order to permit residential land uses like the abutting lands to the south. This would advance the Provincial policy directives aimed at increasing density and promoting a range of residential uses within close proximity of a higher order transit route. A copy of the requested revision to Map 3 of ROPA 6 is included at the end of this letter.

SUBJECT LANDS

The subject lands have a total area of approximately 5.96 hectares and has street frontage on both Elgin Street North and Athlone Road in the City of Cambridge. The subject lands are located east of, and in close proximity to Hespeler Road and the future Stage 2 ION rapid transit route. The subject lands are located within close proximity to the future 'Delta' ION Station. The Growth Plan defines a Major Transit Station Area (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.*

The subject lands are in close proximity to a range of surrounding land uses, such as, industrial uses to the north, east and west, and residential uses to the south. The lands that are proposed to be converted from employment to residential are considered to be at the edge of an employment area, and are directly adjacent to existing residential uses.

A majority of the subject lands are currently vacant. A hydro line runs along the northern portion of the property in an east-west direction. Existing grades on the property are variable and access to the subject lands is limited to Elgin Street North with the opportunity to create an access off of Athlone Road.

PROJECT PROPOSAL

Although the majority of the subject lands are currently vacant, a preliminary development concept has been prepared for the subject lands, which contemplates a range of residential uses and densities. Access to the future development could be provided via the existing Elgin Street entrance and/or via a new street access to be created to Athlone Road. The plan would also allow for the construction of any necessary stormwater management facilities/ponds for the proposed development.

The proposed residential development of the lands would be appropriate given that the location of the proposed residential uses would form a natural extension and transition of the existing residential area immediately south. Furthermore, development of the subject lands can be coordinated to ensure compatibility with the adjacent employment uses.

The subject lands are strategically located in proximity to Highway 401, and major transit routes including ION to provide connections throughout the Region. The provision of the proposed residential use would provide for transit supportive development and densities in the form of residents and jobs as outlined in Section 2.D.6 Transit-Supportive Development Policies in Amendment 6 of the Region of Waterloo Official Plan.

RATIONALE FOR EMPLOYMENT CONVERSION

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020)

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 August 28, 2020. It attempts to address several challenges to employment planning in the Province. This amendment to the Growth 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 provincial policies allow 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, Local Centres, Regional Intensification Corridors, and Local Intensification Corridors.

City of Cambridge Official Plan

The subject lands are designated **Business Industrial** in the City of Cambridge Official Plan (Map 2), as shown on Figure 1, below. The Business Industrial designation permits traditional industrial parks which allow for a range of industrial and office uses. The subject lands are directly adjacent to lands that are designated Low-Medium Density Residential.

The predominant land use in Business Industrial is envisioned to be traditional industrial parks which allow for a range of industrial and office uses. Lands within this designation are generally on the periphery of employment areas or commercial areas, and are intended to serve as a buffer between traditional industrial uses and sensitive uses.

Given the limited access to the subject lands, existing grades and the proximity to existing residential uses, the range of employment uses are limited for the subject lands.

Further, the subject lands are located within walking distance of the future Delta ION Station, a station on the future Stage 2 Light Rail Transit Route in Waterloo Region.



Figure 1: Land Use Plan (City of Cambridge Official Plan)

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

The City of Cambridge Official Plan states that the conversion of employment lands within employment areas to non-employment uses may only be permitted through a municipal comprehensive review initiated by the Region and must satisfy a series of tests. Due to recent changes to the Growth Plan policies, employment conversions are permitted in advance of a Municipal Comprehensive Review, subject to a similar series of tests, as detailed later on in this section.

Policy 2.6.6.1 of the City of Cambridge Official Plan states that Major Transit Station Areas are within a 600 to 800 metre radius of a rapid transit station area. Regional Official Plan Amendment No. 6 also included updated mapping to delineate the Major Transit Station Areas within the City of Cambridge. Based on the updated MTSA mapping in the ROP Amendment No. 6, the subject lands are within close proximity to a Major Transit Station Area. The Major Transit Station Areas, and their associated policies, are to be designated by the City through an amendment to the City Official Plan, in accordance with the mapping and policies of the Regional Official Plan. Furthermore, a Station Area Plan will be prepared for each Major Transit Station Area located outside of the Urban Growth Centre, as stated in policy 2.6.6.3. **At this point in time, the City of Cambridge Official Plan has not yet been updated to include a Station Area Plan for the Major Transit Station Areas outside the Urban Growth Centre.**

Though the Station Areas have not yet been delineated in the City Official Plan maps, the subject lands are located within walking distance (approximately 800 metres) of the future Delta ION Station. Furthermore, Map 5a of the current Region Official Plan identifies Franklin Blvd., east of the subject lands, as a Planned Transit Corridor.

Section 2.7.2 of the City of Cambridge Official Plan deals with the conversion of employment lands. As such, Policy 2.7.2.1 provides the following criteria that are to be demonstrated for the City to consider the conversion of employment lands within employment areas to non-employment uses through a municipal comprehensive review:

- a) there is a need for the conversion;*
- b) the employment forecasts pursuant to this Plan will be met;*
- c) the conversion will not adversely affect the viability of the employment area, and achievement of the intensification target, density targets and any other policies of this Plan;*
- d) there is existing or planned infrastructure to accommodate the proposed conversion;*
- e) the lands are not required over the long-term for the employment purposes for which they are designated; and*
- f) cross-jurisdictional issues have been considered*

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

The lands immediately to the north of the subject lands are also designated 'Business Industrial' on Map 2 of the Official Plan. We understand that any redevelopment to more sensitive uses, including residential uses, should ensure a design that is compatible with the surrounding land uses, and would also be subject to Provincial regulations and land use compatibility analysis through *Planning Act* applications.

The Business Industrial designation contemplates a wide range of permitted uses, including but not limited to, manufacturing, warehousing, printing, and hotel and banquet facilities. The designation also contemplates that these areas may be zoned to permit complementary uses such as banks and financial services, child care centres, fitness centres and restaurants, provided they are located within an industrial mall. **In summary, the Business Industrial designation contemplates a wide range of 'light industrial' and office uses, as well as complementary commercial uses.**

While the subject lands have not been identified as part of the Delta Station Study Area, they are located within a 10 minute walk to the future Delta ION station. Throughout the Growth Plan (2020), 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 including the subject lands within the Delta Station Area Plan when the City undertakes an update to the Official Plan to include the remaining Major Transit Station Areas outside of the Urban Growth Centre. Furthermore, the lands should be developed to help meet the intent of an MTSA, and the City and Region's density and intensification targets for MTSA's, through the development of a wider range of uses, including employment, office and residential.

Given the foregoing, the subject lands should be removed from their current Business Industrial designation to permit a wider range of uses and align with the directives of the Transit Oriented Development framework outlined by the Region of Waterloo.

CONVERSION REQUEST AND ANALYSIS

Our client wishes to formally request the conversion of the subject lands in the Region of Waterloo Official Plan, and request that the subject lands not be identified as an Employment Area on Map 3 of ROPA 6, in order to permit residential land uses like the abutting lands to the south. This would advance the Provincial policy directives aimed at increasing density and promoting a range of residential uses within close proximity of a higher order transit route. The addition of residential uses can be developed appropriately to ensure compatibility between the proposed sensitive use (residential) and the existing and future employment uses to the north as a land use compatibility analysis will be required as part of any future *Planning Act* applications for the subject lands.

The landowner is not currently proposing a specific development for the subject lands, but would like consideration from the Ministry for an employment conversion, and request that the subject lands not be identified as an Employment Area on Map 3 of ROPA 6, so that the lands may be redesignated and rezoned to allow for residential uses. This is supported by the proximity of the lands to the future Delta ION Station, as well as the range and mix of land uses which exist surrounding the subject lands.

Analysis of Employment Land Conversion Criteria

This proposal has been evaluated against the Growth Plan criteria of Policy 2.2.5.9, which 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. Notwithstanding Policy 2.2.5.9 of the Growth Plan, Policy 2.2.5.10, permits lands within existing employment areas to be converted to a designation that permits non-employment uses prior to the next municipal comprehensive review subject to specific criteria.

As outlined in the following table, the identified Growth Plan Criteria are met in the case of the proposed conversion of the subject lands.

Growth Plan (2020) Criteria	Evaluation
1. There is a need for the conversion	The subject lands are within close proximity to a Major Transit Station Area (MTSA) and thus are considered to be within a strategic growth area. Given that the majority of the lands have not yet been developed, they present a unique opportunity to align development with the Transit Oriented Development Policies that were established by the Region of Waterloo, and provide for a unique opportunity to allow for a development with a wider range of uses (including residential) within the built boundary of the City of Cambridge to contribute to density and intensification targets and will significantly contribute to the City's housing supply.
2. The lands are not required over the horizon of the Growth Plan for the employment purposes for which they are designated	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 the entirety of the lands should be maintained for employment uses.</p> <p>Furthermore, the subject lands are <u>not</u> located within an identified provincially significant employment zone, which are strategically identified to provide stable, reliable employment areas across the GGH.</p>
3. The Region and Area Municipalities will maintain sufficient lands to accommodate forecasted employment growth to the horizon of the Growth Plan	<p>Converting the subject lands to an alternate land use designation would better align with the Province's direction with respect to development within proximity of MTSA's. Lands within these areas should be reconsidered for alternate designations that allow for a variety of uses/densities, and contribute to overall density and intensification targets.</p>
4. The proposed use would not adversely affect the overall viability of the Employment Area	<p>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 similarly contribute to the overall intensification and density targets given the size of the subject lands. 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 west, and provide appropriate separation from these sensitive uses. The conversion of the subject lands would also provide for an appropriate land use transition with the residential lands to the south.</p> <p>Land use compatibility analysis will be required as part of any future <i>Planning Act</i> applications for the subject lands.</p>
5. The proposal would not adversely affect the achievement of the minimum intensification targets and density targets	<p>The proposal to convert the subject lands from Business Industrial land uses to residential will allow for the generation of a significant number of residents and jobs across the subject lands, consistent with the intent of the Growth Plan.</p>

<p>6. There is existing infrastructure and public service facilities to accommodate the proposed conversion</p>	<p>The majority of the subject lands are not currently serviced as they are vacant. Future development would be serviced by the existing infrastructure along Elgin Street. Any future development or increase in density to this property would be subject to a review of the current servicing capacity, as part of a future <i>Planning Act</i> application.</p> <p>As the subject lands are within the Built-Up Area of the City of Cambridge, the lands are within proximity of a range of public service facilities that serve the adjacent residential neighbourhood to the south, and are also in proximity of a major transportation infrastructure investment, the future ION Light Rail Transit corridor.</p>
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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 uses. Future development on the subject lands is envisioned to consist of a mix of residential and light employment uses that will contribute to a complete community and be developed at a density that is transit supportive.

Summary/Conclusion

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

- This request for employment conversion is consistent with the policies of the Provincial Policy Statement (PPS) 2020, which permit the conversion of lands within employment areas to non-employment uses in advance of a municipal comprehensive review (Policy 1.3.2.5);
- This request for employment conversion conforms to the policies of the Growth Plan, which permits the conversion of lands not only within the context of a municipal comprehensive review, but also prior to the next municipal comprehensive review (Policies 2.2.5.9 and 2.2.5.10);
- The lands satisfy the evaluation criteria for the conversion of employment lands as stated in Policy 2.2.5.9 of the Growth Plan (2020);
- The location of the subject lands relative to the future Delta ION Station makes the lands ideally situated for a development which increases the range of existing uses and provides transit supportive densities; and,
- The subject lands present a unique opportunity to redevelop a large, underutilized property within the Urban Boundary to provide a wider range of uses, which will contribute to the overall density and intensification targets identified in the Growth Plan, Regional Official Plan and City of Cambridge Official Plan.

The information provided herein provides a high level summary and justification as to why the subject lands are appropriate for consideration for conversion to non-employment uses. We kindly ask that you

take this request into consideration before issuing final approval of the Region of Waterloo Official Plan Amendment No. 6. Please contact the undersigned if you require anything additional.

Thank you,

MHBC

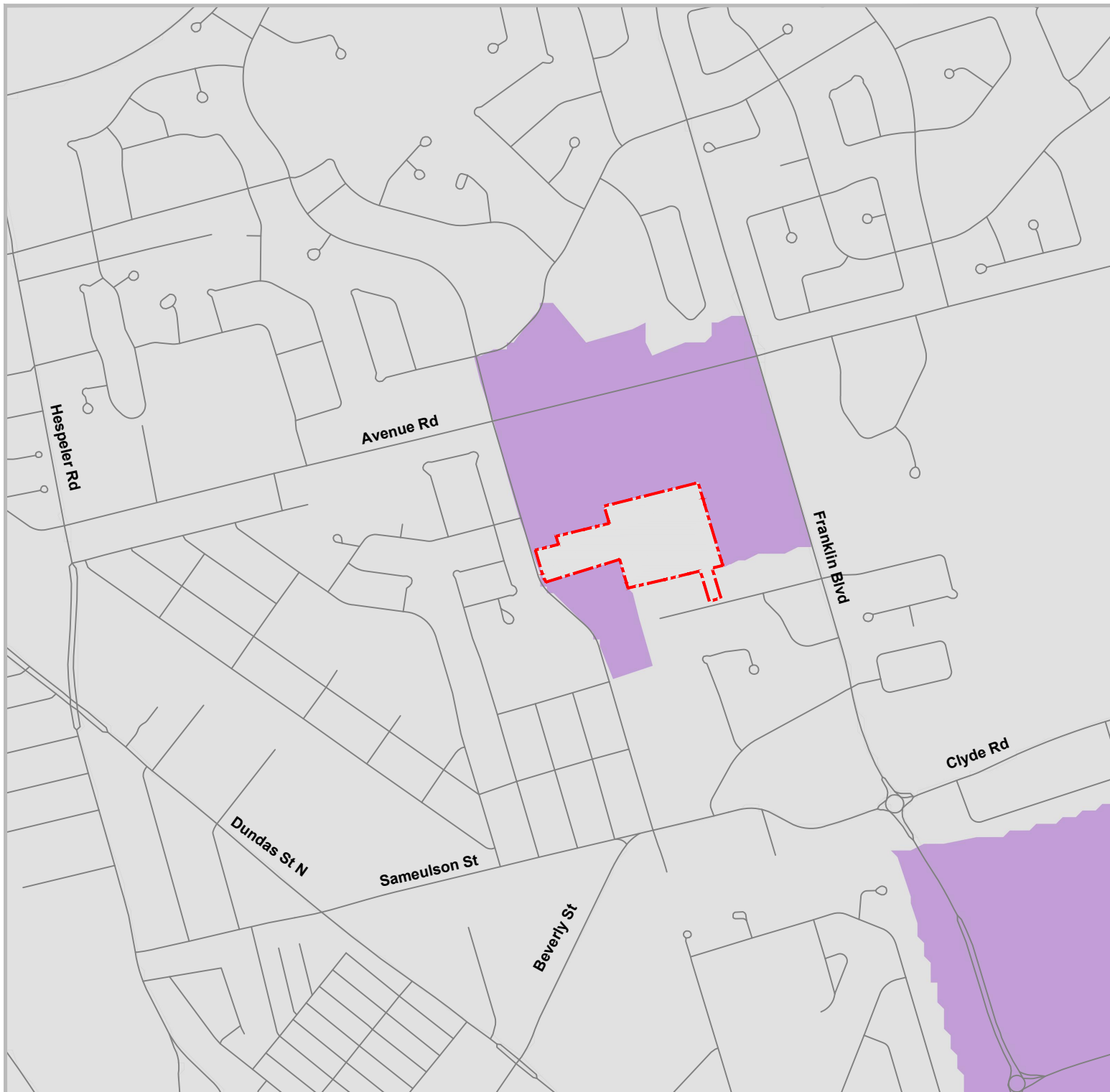
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Pierre Chauvin, MA, MCIP, RPP
Partner

A handwritten signature in black ink, written in a cursive style.

Luisa Vacondio, BES
Planner

cc. *David Medeiros*






Proposed Amendment to Map 3: Employment Area

Region of Waterloo, 2022

Elgin Street N
City of Cambridge
Region of Waterloo

LEGEND

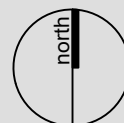
-  Subject Lands - Proposed to be removed from Employment Area
-  Employment Area
-  Urban Area

DATE: December 23, 2022

SCALE: NTS

FILE: 18407D

DRAWN: JB/PL



K:\18407D-Elgin St N- Cambridge\Rpt\Amendment - ROPA 6 Map 3.dwg



**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**

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