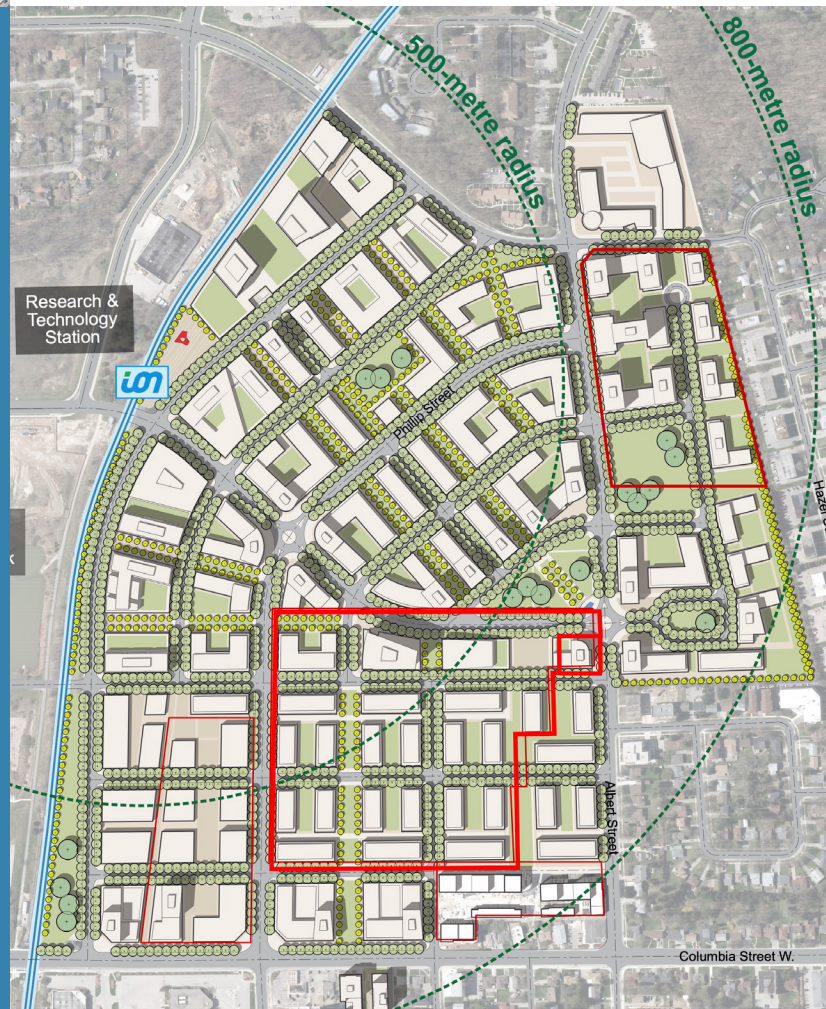




Request for an Employment Area Conversion

Research + Technology MTSA
City of Waterloo

Regional Official Plan Amendment 6
Region of Waterloo



Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

Executive Summary

This submission has been prepared on behalf of Prica Global Enterprises Inc. (Prica). Prica has been part of the Waterloo community for over 19 years and within that time has become a critical contributor and witness to Waterloo's growth and expansion. Prica's main goal as an investor, developer and change-maker is to enhance the City they call home, and to continue to participate in the successful evolution of this modernizing Region.

The Subject Lands

Prica are owners of the Subject Lands, within the Research + Technology Major Transit Station Area (MTSA) in the City of Waterloo. As identified on **Map 1**, the Subject Lands include:

- > 388 Phillip Street - a 9.71 hectare parcel that is currently occupied by a vacant, primarily single storey industrial building, surrounded by a large surface parking lot; and,
- > 413 Albert Street - a smaller 0.14 hectare parcel that is currently occupied by a two-storey automotive sales and repair shop. 413 Albert Street abuts 388 Phillip Street.

The Subject Lands are located in an area that was formerly a traditional business park for a number of large technology companies, but is now predominated by numerous vacant or underutilized former employment buildings in a land extensive form of development that is characteristic of traditional employment areas – including large, low-rise buildings and expansive surface parking lots.

The Subject Lands are strategically and centrally located within the Research + Technology MTSA, in the City of Waterloo, within 500 and 800 metres walking distance from the associated ION LRT station, as well as in proximity to the University of Waterloo, located immediately to the south. The Subject Lands, if redeveloped with mixed-use, higher density land uses, can accommodate:

- > Substantive employment generating land uses including office uses, institutional uses, retail and service commercial uses, hotels and restaurants;
- > Community facilities and parks and open spaces; and,
- > More than 3,000 dwelling units (depending on density permissions provided in subsequent planning documents), including opportunities for student housing and affordable and attainable housing.

The Landowners

Prica has been part of the Waterloo community for over 15 years and within that time has become a critical contributor and witness to Waterloo's growth and expansion. Prica's main goal as an investor, developer and change-maker is to enhance the City they call home, and to participate in the evolution of this modernizing Region.

Submitted on Behalf of Prica Global Enterprises Inc.

156 Columbia St W, Waterloo, ON N2L 3L3

Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

Residential property development and management is at the core of what Prica does, with a strong tie to the Waterloo community. Prica has a proven track record of delivering top quality residential development projects that respond to local housing needs and play a crucial role in expanding and diversifying the Region's housing stock.

Prica has achieved building milestones through their use of traditional, as well as modern building practices, including state-of-the-art District Energy technologies. Through their integrated project delivery system, Prica has designed, built, serviced and managed over 20 properties in and around the Waterloo Region, including within the Research + Technology MTSA. Prica's focus on building quality and pushing architectural limits has earned them a reputation for excellence in the residential market.

A letter from Prica is included below, which provides additional information on their history, their operations, and the challenges and opportunities that they experience first hand, every day, with new residential development in the Waterloo Region.

Purpose

This submission is with regard to the Region of Waterloo's Official Plan Amendment Number 6 (ROPA 6), which was adopted by Regional Council on August 18, 2022, with a particular focus on the "Employment Area" designation proposed on the Subject Lands as part of an isolated Employment Area pocket within the Research + Technology MTSA in the City of Waterloo (see **Map 2**).

Within ROPA 6, "Employment Area" lands are required to be planned and protected for employment uses over the long term, including manufacturing, warehouses, offices, research and development uses, and associated ancillary uses. Residential uses are not permitted. A minimum density target of just 35 jobs per hectare is to be applied to new development within designated "Employment Areas".

The purpose of this submission is to request the removal of the Subject Lands from the "Employment Area" designation, and to redesignate the Subject Lands as "Urban Area/Township Urban Area" on Map 3 of ROPA 6 (see **Map 3**). That change in designation in ROPA 6 would:

- > Remove the "protected from conversion" status of the Subject Lands - the "Employment Area" designation only permits employment generating land uses, at densities typical of a suburban business park, where future conversions to permit non-employment uses can only occur through a subsequent Municipal Comprehensive Review (MCR) process; and,
- > Facilitate appropriate long-term and comprehensive planning within the Research + Technology MTSA that promotes a high density, truly mixed-use community, including more than 3,000 high density residential dwelling units, in conjunction with consequential employment generating land uses that are specifically transit-supportive in recognition of the recent, and ongoing investments in higher order transit in this location, and throughout the Region.

Submitted on Behalf of Prica Global Enterprises Inc.

156 Columbia St W, Waterloo, ON N2L 3L3

Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

Planning Justification

It is our professional planning opinion that:

- > ***The Proposal Satisfies the Growth Plan's Tests for Conversion*** - The proposed conversion of the Subject Lands from the "Employment Area" designation to the "Urban Area/Township Urban Area" designation in ROPA 6 satisfies the tests established in Section 2.2.5.9 of the Growth Plan for employment land conversions, and constitutes good planning that will support population and employment growth, existing and future transit investment, and the overall vitality of the City, Region and Province as a whole.

On the other hand, and while ROPA 6 appropriately focuses on accommodating new growth through intensification, it otherwise does not conform with the intent of the policies of the Growth Plan because:

- Through the designated Employment Area pocket within the Research + Technology MTSA, including the Subject Lands, it plans for low density and space extensive land uses and built forms that are specifically prohibited by the Growth Plan and that may adversely affect the achievement of the minimum density target (160 persons and jobs combined per hectare) and the achievement of transit-supportive densities (Sections 2.2.4.6 and 2.2.4.9 of the Growth Plan); and,
 - Regional staff have indicated to the Prica team that their rationale for maintaining the Subject Lands within the Employment Area designation is, in part, to implement a form of "phasing" for the ultimate redevelopment of the MTSA. This forced phasing approach will not allow for the appropriate long-term comprehensive planning of the MTSA and in essence is an attempt to "slow" redevelopment of the MTSA, which will also frustrate, if not preclude the ability for the MTSA to achieve transit-supportive densities. This "phasing" approach will also delay the delivery of much needed new housing, as well as higher-density employment generating uses, which is directly contrary to Provincial priorities and policies;
- > ***The Proposal Conforms with the Additional Conversion Criteria from the Region*** - In addition to Section 2.2.5.9 of the Growth Plan, the requested conversion of the Subject Lands also conforms with the additional criteria established by the Region and utilized to review requests for Employment Area conversion through their MCR process; and,
 - > ***The Proposal Conforms with the Growth Plan Policies for MTSA Planning*** - Prica's vision for the Subject Lands is expected to provide short-term opportunities for the development of over 3,000 dwelling units (depending on density permissions provided in subsequent planning documents), including opportunities for student housing and affordable and attainable housing, in support the Province's Housing Action Plan. In addition, Prica's vision within the broader MTSA, supports the policies of the Growth Plan for MTSA planning by promoting the opportunity to achieve the following key principles:
 - Promote and support intensification as a crucial element of long-term growth throughout the Region;

Submitted on Behalf of Prica Global Enterprises Inc.

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Conversion Request - 388 Phillip Street and 413 Albert Street

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- Develop a complete community where people can live, work, shop and play;
- Commit to Transit-Supportive Development;
- Ensure employment viability;
- Provide for a range of housing typologies and tenures, including the provision of student housing, as well as affordable and attainable housing units;
- Promote sustainability and respond to a changing climate;
- Establish a robust public realm system, comprised of a hierarchy of amenities and open spaces; and,
- Build upon the existing streets to create a fine-grained, connected movement network that incorporates all of the elements of active transportation.

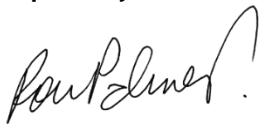
Conclusion

Prica is a significant land owner within the Research + Technology MTSA, a Strategic Growth Area within 500 to 800 metres of the Research + Technology ION Light Rail Transit Station where intensification and redevelopment is planned and promoted. In addition to the Subject Lands, Prica also owns:

- > 130 Columbia Street West and 365 Albert Street – The Hub;
- > 446 Albert Street; and,
- > 156 & 160 Columbia Street West, and 385 & 405 Phillip Street.

Prica are an instrumental partner, committed to collaborating with the Province, the Region and the City, as well as other land owners – helping to craft a long-term, and comprehensive vision for this evolving part of the City of Waterloo. Through their multiple land holdings within the Research + Technology MTSA, Prica is ready and willing to contribute to a high density, truly mixed-use community, which will include high density residential development - including opportunities for student housing and opportunities for affordable and attainable housing - as well as consequential employment generating uses at a transit-supportive density.

Respectfully Submitted



Ron Palmer, BES, MCIP, RPP
City Planner
1262730 Ontario Inc.

Submitted on Behalf of Prica Global Enterprises Inc.

156 Columbia St W, Waterloo, ON N2L 3L3



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December 21, 2022

Hon. Steve Clark
Minister of Municipal Affairs and Housing
Province of Ontario
17th Floor
777 Bay Street, Toronto, Ontario
M7A 2J3

Re: *Region of Waterloo Official Plan Amendment 6 - Conversion Request - 388 Phillip Street and 413 Albert Street, City of Waterloo*

Dear Mr. Minister,

Prica Global Enterprises Inc., its group of companies, and preferred partners are pleased to write to you to share our vision for the future of the Research + Technology Major Transit Station Area in the City of Waterloo, Ontario and provide insight into our history and role as a developer and change-maker in this great community.

We submit this letter in support of the request for the Employment Area conversion of 388 Phillip Street and 413 Albert Street, Waterloo, which would allow us to move forward with our vision for a mixed-use, transit-supportive, vibrant urban community where residents can live, work, shop and play.

Since starting in 2003 with the purchase and renovation of a single family home in Waterloo, Prica Global Enterprises Inc. has grown exponentially with the construction over 3,100 purpose-built student bedrooms and an additional 2,700 residential dwelling units in Waterloo, Ontario. Majority units constructed to-date are located within 1 kilometre of either the University of Waterloo, Wilfrid Laurier, or Conestoga College (Waterloo campus) and are within 3 kilometres of Uptown Waterloo. We have built our story on growing with the principles of efficiency and innovation while maintaining integrity, quality and pride of ownership.

Over the last 19 years, we have completed at least one building every August and have retained ownership of 1,600 of the purpose-built student bedrooms and 2,100 of the residential dwelling units we have constructed. We have also constructed Canada's largest open-loop geothermal energy system and are planning to expand that system to provide sustainable district energy our new urban neighbourhood at 388 Phillip Street and 413 Albert Street.

We live where we build and we love where we live. We view every project as a whole, right from the design of the development, to construction of the project, to completion and leasing of the project. Our developments are designed to service and respond to the community's needs and have evolved over time. We started in the development industry focused solely on the construction of student housing for post-secondary students attending Wilfrid Laurier University, the University of Waterloo, and Conestoga College. As our community evolved, we transitioned to designing our developments in a more urban form to appeal also to young professionals. Currently our portfolio of tenants is a mixture of post-secondary students, young professionals, and families, and we are continuing to evolve to bring innovative housing solutions to serve these members of our community. We strive to connect our local community to the world.

We saw our community was beginning to evolve and face a housing shortage, especially in the urban areas near the universities, colleges, and David Johnson Research & Technology Park. We heard from employers that employees were concerned about a lack of housing options. Additionally, our residential rental portfolio has been entirely leased every year and as we experienced increased pressure on the housing market in 2022, we now have more than 2,500 people on our waitlist for renting residential units. We are experiencing unprecedented demand for housing in our community.



Seeing a growing need for complete urban neighbourhoods, 6 years ago we started investing further in this neighbourhood with the vision of providing a variety of housing options and tenures, a mix of uses, recreational and institutional facilities, and active transportation networks. The redevelopment of the subject lands will bring much needed housing to Waterloo Region and due to the proximity to the University of Waterloo and Wilfrid Laurier University, the lands are uniquely positioned to provide accommodations for post-secondary students and young professionals, particularly those in the creative sector.

We want to build a complete community that expands upon Canada's largest open-loop geothermal energy system to provide sustainable energy to the development. But to achieve this vision and bring more than 3,000 housing units and new employment opportunities to this neighbourhood, we need support from the Province to remove the employment area protections on 388 Philip Street and 413 Albert Street.

In Regional Official Plan Amendment 6, the Region of Waterloo has proposed many positive forward-thinking policies for the development of complete communities and 15-minute neighbourhoods. We feel that our neighbourhood - the defined Research and Technology Major Transit Station Area - is an excellent opportunity for regeneration and redevelopment built upon those policies.

The Region has supported the conversion of many of the surrounding properties in the Major Transit Station Area, but has, without substantiated rationale, proposed to retain employment area designation on 388 Phillip Street and 413 Albert Street. We feel this was a missed opportunity to develop a cohesive and comprehensive community. 388 Phillip Street and 413 Albert Street are the geographic heart of this Major Transit Station Area and without their conversion, lands within the neighbourhood will remain underutilized.

We ask that you consider the material and work completed by our team of professionals in support of this submission, with the hope that you agree that more housing is needed and that the Research + Technology Major Transit Station Area, and the Subject Lands would be an appropriate place to accommodate it.

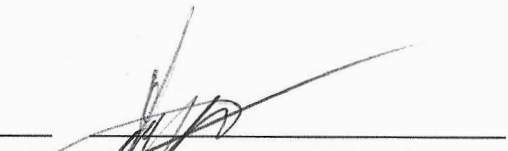
We look forward to hearing from you. Thank you for your time and consideration.



Zeljko Prica
President



Drazen Prica
Vice President



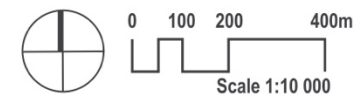
Nenad Prica
Vice President



MAP 1 - SUBJECT LANDS & PRICA LAND HOLDINGS

LEGEND

- Regional Major Transit Station Area Boundary
- Subject Lands
- Other Lands owned by Prica:
 - A 160 Columbia Street W. (0.37 ha)
 - B 156 Columbia Street W. (1.26 ha)
 - C 140 Columbia Street W. (1.31 ha)
 - D 143 Columbia Street W. (0.80 ha)
 - E 130 Columbia Street W. (1.29 ha)
 - F 446 Albert Street (4.72 ha)
- ||| ION LRT Line
- 500-800m Radius Around ION LRT Station

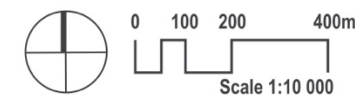




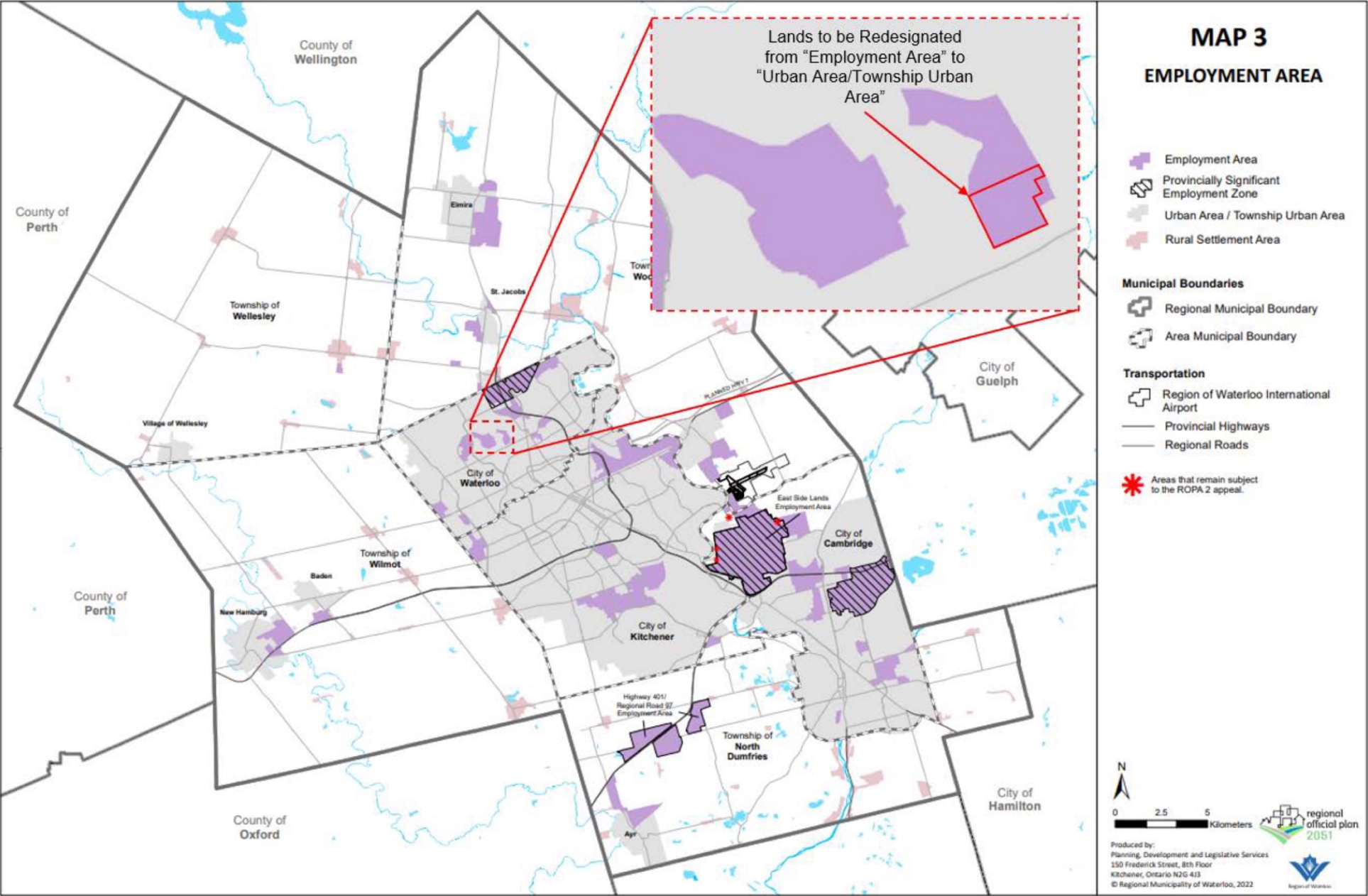
MAP 2 - MTSA & Regional Employment Area

LEGEND

- Regional Major Transit Station Area Boundary
- Regional Employment Areas
- Subject Lands
- Other Lands owned by PGE:
 - A** 160 Columbia Street W. (0.37 ha)
 - B** 156 Columbia Street W. (1.26 ha)
 - C** 140 Columbia Street W. (1.31 ha)
 - D** 143 Columbia Street W. (0.80 ha)
 - E** 130 Columbia Street W. (1.29 ha)
 - F** 446 Albert Street (4.72 ha)
- ION LRT Line
- 500-800m Radius Around ION LRT Station



MAP 3 - PROPOSED MODIFICATIONS TO ROPA 6 (MAP 3)



Conversion Request - 388 Phillip Street and 413 Albert Street
Research + Technology MTSA, City of Waterloo

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Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

1. THE SUBJECT LANDS

This submission has been prepared on behalf of Prica Global Enterprises Inc. (Prica), owners of 388 Phillip Street and abutting 413 Albert Street (the Subject Lands) in the City of Waterloo. The Subject Lands are located within the Research + Technology MTSA, in an area that was formerly a traditional business park for a number of large technology companies, but is now predominated by numerous vacant or underutilized former employment buildings in a land extensive form of development that is characteristic of traditional employment areas, including large, low-rise buildings and expansive surface parking lots.

The MTSA is located just to the north of the University of Waterloo campus and the Northdale neighbourhood, which has been a focus for new higher density residential and mixed-use development in recent years.

The Subject Lands are comprised of (see **Map 1**):

- > 388 Phillip Street - a 9.71 hectare parcel that is currently occupied by a vacant, primarily single storey industrial building, surrounded by a large surface parking lot; and,
- > 413 Albert Street - a smaller 0.14 hectare parcel that is currently occupied by a two-storey automotive sales and repair shop. 413 Albert Street abuts 388 Phillip Street.

To reinforce Prica's commitment to the success of the Research + Technology MTSA, Prica also owns a number of other properties within the MTSA, including:

- > 446 Albert Street – located just to the northeast of the Subject Lands;
- > 156 & 160 Columbia Street West – located just to the west of the Subject Lands; and,
- > 385 & 405 Phillip Street – also located just to the west of the Subject Lands.

The attached **Map 1** identifies:

- > The Subject Lands;

- > Other lands owned by Prica within and near the Research + Technology MTSA Boundary; and,
- > The Research + Technology MTSA Boundary, as established by the Region of Waterloo.

2. PURPOSE

This submission is with regard to the Region of Waterloo's Official Plan Amendment Number 6 (ROPA 6), which was adopted by Regional Council on August 18, 2022, with a particular focus on the "Employment Area" designation proposed on the Subject Lands that are also located within the Research + Technology MTSA, in the City of Waterloo.

Under ROPA 6, the Subject Lands are identified within the Research + Technology MTSA and are also designated as "Employment Area". As illustrated on **Map 2**, the "Employment Area" designation applies to much of the western half of the MTSA, where the David Johnston Research & Technology Park is located, and to an isolated central pocket in the eastern half of the MTSA, where the Subject Lands are located. This isolated pocket is bordered by existing mixed-use development (including residential) to the south, lands proposed to be excluded from the "Employment Area" designation to the east and west, and residential lands to the north.

As such, the Subject Lands are located within an isolated "Employment Area" pocket that is not contiguous with any larger "Employment Areas". Further the Subject Lands are bordered by lands which either already include residential uses, or are expected to be redeveloped and intensified for mixed-use purposes (including residential) over the long term.

"Employment Area" lands are required to be planned and protected for exclusively employment generating land uses over the long term, including manufacturing, warehouses, offices, research and development uses, and associated ancillary uses. Residential uses are not permitted. As required by ROPA 6, a minimum density target of just 35 jobs per hectare is to be applied to new development within designated "Employment Areas".

Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

The Subject Lands are currently underutilized, and are located within approximately 300 to 800 metres of the Research + Technology ION Station, which is part of the Region's ION Rapid Transit network.

The purpose of this submission is to request the removal of the Subject Lands from the "Employment Area" designation, and to redesignate the Subject Lands as "Urban Area/Township Urban Area" on Map 3 of ROPA 6 (see **Map 3**). That change in designation in ROPA 6 would:

- > Remove the "protected from conversion" status of the Subject Lands - the "Employment Area" designation only permits employment generating land uses, typical of a suburban business park, where future conversions to permit non-employment uses (including residential uses) can only occur through a subsequent Municipal Comprehensive Review (MCR) process; and,
- > Facilitate appropriate long-term and comprehensive planning within the Research + Technology MTSA that promotes a high density, truly mixed-use community, including over 3,000 high density residential dwelling units in conjunction with consequential employment generating land uses that are specifically transit-supportive in recognition of the recent, and ongoing investments in higher order transit in this location, and throughout the Region.

Importantly, the request for the removal of the Subject Lands from the "Employment Area" designation in ROPA 6, to be redesignated within the "Urban Area/Township Urban Area" designation, would not automatically eradicate the requirement to provide employment generating land uses on the Subject Lands, or any other lands within the Research + Technology MTSA. Rather, this would establish the opportunity for a complete and vibrant mixed-use community that includes employment generating land uses, which will likely meet or exceed typical employment densities in the area, along with higher density housing, including opportunities for student housing and opportunities for affordable and attainable housing, retail and service commercial uses, institutional uses, community facilities and parks and open space opportunities. The attached **Map 2** identifies:

- > The Research + Technology MTSA boundary, as proposed by the Region of Waterloo;

- > Both the 500 metre and 800 metre walking distance radii from the Research + Technology ION Transit Station;
- > The Subject Lands, as well as other lands owned by Prica within and near the Research + Technology MTSA Boundary; and,
- > The "Employment Area" designation, as proposed by ROPA 6.

3. PLANNING JUSTIFICATION

The Subject Lands are strategically and centrally located within the Research + Technology MTSA. The Subject Lands are significant in scale, occupying five percent of the total area of the MTSA on their own, and provide the opportunity to accommodate new forms of mixed-use development and significantly higher densities than currently exist. The Subject Lands, if developed with mixed-use, higher density land uses, can accommodate substantive employment generating land uses, higher density housing - including student housing and affordable and attainable housing - retail and service commercial uses, institutional uses, community facilities and parks and open space opportunities.

This Section of the submission provides a planning rationale for removal of the Subject Lands from the "Employment Area" designation that is applied to the Subject lands through ROPA 6. The focus of this planning justification includes:

- > The proposal satisfies the Growth Plan's tests for Conversion;
- > The proposal conforms with the additional conversion criteria from the Region; and,
- > The proposal conforms with the Growth Plan policies for MTSA planning.

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The Proposal Satisfies the Growth Plan's Tests for Conversion

Section 2.2.5.9 of the Growth Plan establishes a number of criteria that must be satisfied for an employment land conversion to be granted through a MCR process. The requested removal of the Subject Lands from the "Employment Area" designation in ROPA 6 satisfies the tests under the Growth Plan, and constitutes good planning that will support population and employment growth, existing and future transit investment, and overall vitality of the City, Region and Province. A review of the Provincial employment conversion criteria with respect to the Subject Lands is provided below:

- > **Section 2.2.5.9, subsection a) of the Growth Plan requires that "there is a need for the conversion"** - Requests for conversion must satisfy a demonstrated need, including supporting strategic growth areas, such as Urban Growth Centres and MTSAs, and Complete Communities by addressing existing compatibility issues, or providing the most efficient use of land, as determined by the Region in consultation with Area Municipalities.
 - The issue of need is complex and is demonstrated through an understanding of the requirements to accommodate projected growth compared to the opportunities to accommodate that growth, with new housing in particular being recently identified as a top priority for the Province;
 - In terms of the Region's and City's abilities to plan for and accommodate their forecast residential growth:
 - + The Growth Plan forecasts that the Region of Waterloo's residential population will increase by over 300,000 persons over the next thirty years. ROPA 6 more specifically directs residential growth of nearly 60,000 persons to the City of Waterloo, which represents a growth rate of nearly 50%. ROPA 6 further directs that at least 83% of this growth is to be accommodated through intensification. As such, it is imperative that the Region and City optimize opportunities to accommodate new housing through

intensification, especially in Strategic Growth Areas like MTSAs.

- + Promoting intensification and redevelopment within MTSAs in a key pillar of ROPA 6 and its plan to accommodate growth to the 2051 planning horizon. Achieving the minimum density target set for the Research + Technology MTSA, which is 160 people and jobs per hectare, requires that both Major Office and higher density residential uses be permitted and accommodated, along with other supporting commercial and institutional uses.

More importantly, a robust and land efficient mixture of uses, including Major Office, other businesses, retail, service commercial, institutional and high density residential uses, tends to support transit investment better than low density, single use employment areas. Furthermore, mixed-use districts support the achievement of a Complete Community, and ultimately, desirable neighbourhoods where people will want to live, work, shop and play;

- + Beyond the population and employment growth forecasts outlined in the Growth Plan and ROPA 6, recent announcements from the Provincial government have established a short-term target for the City of Waterloo to have 16,000 new homes built over the next 10 years. According to the ROPA 6 Land Needs Assessment, the overall housing supply for the entire Region of Waterloo expanded by only 25,000 units over the 10 year period from 2006 to 2016.

In addition, the three growth scenarios evaluated within the Land Needs Assessment only forecast housing growth of between 14,000 and 22,000 units in the City over the next 30 years, to the 2051 planning horizon. As such, the City will need to significantly accelerate and increase new housing development in order to achieve the Province's new short-term housing growth target, and overall will need to plan for a significant increase in housing

Conversion Request - 388 Phillip Street and 413 Albert Street

Research + Technology MTSA, City of Waterloo

- growth compared to what ROPA 6 has anticipated;
- + The requested Employment Land Conversion will permit the true mixed-use redevelopment of the Subject Lands, with a mix of residential, commercial and other employment generating land uses. This will allow the Subject Lands to accommodate at least 3,000 new residential units, including opportunities for student housing and affordable and attainable housing. This will directly support the Province's short-term housing goal for the City, the Province's longer-term population growth forecast for the Region, the City's minimum intensification target, and the minimum density requirement for the Research + Technology MTSA. It will also directly support the Province's Housing Supply Action Plan;
 - In terms of the Region's and City's forecast employment growth:
 - + The Growth Plan forecasts 177,700 new jobs within the Region to the 2051 planning horizon. Of this forecast job growth, ROPA 6 anticipates that a minimum of 71% of all new jobs should be accommodated through Population-Related and Major Office Employment, which should be largely planned and accommodated through reurbanization and intensification within Strategic Growth Areas, including MTSA's. This is increased to 95% to 99% for the City of Waterloo specifically;
 - + Conversely, Employment Lands Employment growth, which is more traditional land extensive industrial and business park development within designated "Employment Areas" in ROPA 6, is only expected to accommodate between 1% and 5% of total employment growth within the City of Waterloo over the next 30 years, as determined by the Land Needs Assessment. As such, planning for employment growth in the Region, and in the City in particular, must focus on higher density Population-Related employment-generating land uses through mixed-use and major office development;
 - + The Subject Lands, and the Research + Technology MTSA more generally, are no longer suitable or viable for low density, land extensive employment uses that are planned for the "Employment Areas" designated in ROPA 6 which are planned to achieve only 35 jobs per hectare. There are multiple other locations within the City and Region with locational qualities more appropriate for those low density, space extensive Employment Land Employment uses. Additionally, traditional "Employment Areas" such as proposed by ROPA 6 on the Subject Lands, do not achieve or support the fundamental requirement of achieving the minimum 160 people and jobs per hectare density target for the MTSA;
 - + The requested Employment Land Conversion will remove the requirement for the Subject Lands to accommodate only lower density Employment Land Employment uses and, instead, will permit mixed-use development in an appropriate urban form, which can include a mix of residential uses, employment-generating commercial and institutional uses, as well as major office uses;
 - Following a commitment to the requested changes to ROPA 6 on the Subject Lands, there will be an opportunity to carry out more detailed planning, design and engineering studies to more fully consider long-term implications of the redevelopment of the Subject Lands, and to maximize the benefits from that development to the City in achieving its city-building objectives and ensuring that the Research + Technology MTSA can accommodate both its forecast residential and employment growth, as well as the Province's more recently announced short-term housing target;
 - > **Section 2.2.5.9, subsection b) of the Growth Plan requires that "the lands are not required over the horizon of this Plan for the employment purposes for which they are designated"** - To ensure that a sufficient amount of land within the Region is designated to provide for a variety of employment uses in desirable locations:

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Research + Technology MTSA, City of Waterloo

- The Subject Lands and other proposed "Employment Areas" within the Research + Technology MTSA have not been identified by the Province as within a "Provincially Significant Employment Zone". Conversely, another Employment Area in the northern end of the City is identified as a "Provincially Significant Employment Zone". This identification recognizes the attributes of that "Employment Area" that are attractive to traditional employment lands development, such as proximity to Highway 85;
- As noted above, a minimum of 71% of future employment growth in the Region should be accommodated through reurbanization and intensification within Strategic Growth Areas, such as the Research + Technology MTSA. Within the City of Waterloo itself, this accommodation of employment growth through reurbanization and intensification increases to between 95% and 99%, as determined by the ROPA 6 Land Needs Assessment. This highlights the intense focus and demand for employment growth in mixed-use, urban environments, and the very limited demand for any new traditional Employment Land Employment growth in the City of Waterloo. Moreover, the Research + Technology MTSA in particular is not located in the vicinity of major highways, rail yards or the Region of Waterloo International Airport, and as such, is highly disadvantaged in terms of attracting traditional lower density Employment Land Employment uses compared to more modern business parks and designated "Employment Areas" found in better locations throughout the City and Region;
- Though the role of traditional "Employment Areas" in accommodating future employment growth is planned to be much more limited than in the past, ROPA 6 nonetheless was easily able to plan for and accommodate future Employment Land Employment growth within traditional "Employment Areas" in much more suitable locations. Specifically, ROPA 6 has identified 456 hectares of designated "Employment Areas" throughout the Region, which are expected to accommodate the Region's forecast Employment Land Employment Growth to 2051. As noted, these new

Employment Areas possess much more attractive locational attributes for traditional industrial uses (e.g. manufacturing, warehousing, etc.), such as proximity to Provincial highways, goods movement corridors and/or the Region of Waterloo International Airport;

- The City of Waterloo's Official Plan clearly expects and plans for a transition from traditional Employment Land Employment in designated "Employment Areas" to a more service-oriented economy centred on Population-Related Employment and Major Office Employment. Chapter 7 of the City's Official Plan states that:

"Waterloo's future economy will increasingly rely on the service sector and particularly the knowledge industries, business services and technology companies. Further, efficient land use patterns, which are critical to a strong, sustainable economy, will be supported by a series of initiatives and other policies of this Plan."

- Looking specifically at the Research + Technology MTSA, it is really a tale of the east and west halves:
 - + On the west side of the ION LRT tracks, the David Johnston Research + Technology Park has shown an ability to attract a number of prominent, predominately technology-oriented businesses in a suburban office format - mid-rise built form, with associated surface parking lots. This reflects the Business Park's connection to the University of Waterloo, which owns and operates the park and can attract businesses to locate within the University's own business Park.

The David Johnston Research + Technology Park's further development potential, through more efficient utilization of existing floor space and development sites, and through development of its extensive inventory of vacant greenfield lands, is expected to accommodate much of the anticipated knowledge industries, business services and technology companies that are the focus of Waterloo's economic

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strategy and who would prefer to located in a single-use Business Park setting;

- + On the east side of the tracks, it is evident, based on an evaluation of the Subject Lands and surrounding area that this "Employment Area" is significantly underperforming. While the "Employment Area" was once home to a concentration of technology businesses, many of these businesses have shut down or have chosen to move to alternative locations. In addition, with the "Employment Area" not having convenient access to goods movement corridors or Provincial highways, it does not possess locational attributes that would make it attractive to traditional Employment Land Employment businesses. It must also compete with the David Johnston Research + Technology Park for the development of new office space, but the Park has a substantial competitive advantage given its affiliation with the University and inventory of greenfield sites that offer more of a clean slate for new development opportunities.

The existing large footprint single-storey buildings that remain on the east side of the tracks, many of which are vacant with an associated supply of expansive surface parking, are a legacy of the past. The Subject Lands themselves are representative of this legacy, featuring an auto repair shop on 413 Albert Street and a large, single-storey former industrial/office building at 388 Phillip Street that is entirely vacant and surrounded by expansive surface parking. However, while the locational attributes of the Subject Site are not appealing to traditional Employment Land Employment development, they are extremely desirable and are an appropriate location for mixed-use redevelopment and intensification. It is anticipated that the Subject Land will have the potential to accommodate significant floor area dedicated to service sector jobs as well as knowledge industries, business services and technology companies, but in a mixed-use and much more urban environment, including the

potential for more than 3,000 residential dwelling units;

- Overall, the characteristics of the Subject Lands, as well as of the Research + Technology MTSA as a whole, make it a desirable location for significant reurbanization and intensification with a combination of Population-Related and Major Office Employment, as well as higher density residential uses, in a truly mixed-use environment that can utilize and leverage the existing transit facilities and support the development of a much more Complete Community;
- Our conclusion is that the Subject Lands and other proposed "Employment Areas" within the Research + Technology MTSA, outside of the David Johnston Research + Technology Business Park, are not required solely for employment purposes and are in fact better utilized to accommodate higher density, transit-supportive mixed-use development, which will continue to include employment generating uses. This form of development provides the opportunity to accommodate significant Population-Related and Major Office Employment, which the Region anticipates will make up at least 71% of its future employment growth and 95 to 99% of the City's future employment growth, as well as higher density residential uses, which will work together to at least achieve the minimum density target for the MTSA.

In fact, it is anticipated that this form of development will likely meet or exceed the typical employment densities for traditional Employment Area development. Comparatively, if all the "Employment Area" designated lands within the eastern part of the MTSA were developed as a traditional "Employment Area", at the planned density of 35 jobs per hectare, which is the minimum density requirement for "Employment Areas" in ROPA 6, they would only be expected to generate a little over 1,000 jobs. As such, the requested conversion will likely better support the Region and City in achieving their employment growth forecasts, while also providing the opportunity to much better accommodate the mix job types

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that the Region has planned for the City, and that the City's Official Plan contemplates;

- > **Section 2.2.5.9, subsection c) of the Growth Plan requires that "the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan"** - To ensure that the employment forecast can be achieved for all types of employment, as determined by the Region's Employment Lands Technical Brief (July 19, 2021) and Lands Needs Assessment (April 2022) for Employment Areas, through maintaining ample land area and a variety of parcel characteristics such as size and access, without hindering the Region's attractiveness to land extensive Employment Land Employment uses or triggering an additional urban area expansion:

- As described above, the Subject Lands are no longer a suitable location for the existing agglomeration of low density, land extensive employment uses that have traditionally located in, and are generally anticipated and planned within "Employment Areas". Instead, these Lands are much better suited for higher-density, transit-supportive, mixed-use development that can provide the same, if not increased levels of employment compared to traditional Employment Land Employment uses, while also supporting the Regional objective of creating Complete Communities and 15-minute neighbourhoods, as noted below;
- Conversely, the Region has, through ROPA 6, identified 456 hectares of designated "Employment Areas" throughout the Region that represent much more suitable and attractive locations for traditional Employment Land Employment uses and are available to accommodate the growth in Employment Land Employment over the planning horizon;
- Given the expectation that the Subject Lands will accommodate a consequential component of employment-generating uses (Population-Related and Major Office) and may in fact generate more employment compared to a low density "Employment Area" form, just in a more urban and mixed-use format, the proposed conversion is expected to have a positive impact and better enable the Region and

City to meet their employment growth forecasts;

- > **Section 2.2.5.9, subsection d) of the Growth Plan requires that "the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan"** - This criterion is subdivided into two parts. First, this criterion deals with the issue of the viability of the "Employment Area":

- The Subject Lands and associated "Employment Area" in the eastern half of the Research + Technology MTSA are no longer viable for the existing mix of Employment Land Employment uses, and therefore, there is no viability to maintain. Low density, land extensive employment uses are no longer appropriate for this location within a defined MTSA;
- ROPA 6 designates this pocket of "Employment Area" including the Subject Lands which is bordered by the following land uses:
 - + To the North - the pocket of designated "Employment Area" is bordered by existing residential neighbourhoods;
 - + To the South - The HUB, a mixed-use, higher density development that includes a substantial residential community; and,
 - + To the East and West - Lands within the former business park that are not proposed to be within the "Employment Area" designation, and are expected to re-develop for a mix of uses, including residential, in the future.

As such, under ROPA 6, this isolated pocket, including the Subject Lands, does not represent a viable, contiguous, or large "Employment Area", and instead represents a low density pocket that is isolated within a broader urbanizing, mixed-use community.

Moreover, as advised by Regional staff, the designation of this pocket of "Employment Area" is primarily intended as a "phasing" tool and would likely be redesignated for mixed-

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use purposes in the long-term. We reject this forced approach to phasing as a strategy that will frustrate comprehensive planning and serve to slow development and the delivery of much needed housing. This approach to phasing further reinforces that the isolated "Employment Area" pocket does not possess any viability to be maintained;

- Where there are existing businesses within the "Employment Area" pocket, including the Subject Lands and surrounding properties, they are generally in the form of low density, low-rise office buildings rather than traditional industrial uses. As such, it is not anticipated that the introduction of residential and other commercial and institutional uses will result in any compatibility constraints and, in fact, these new uses will likely support existing businesses by providing proximate housing and commercial services for employees, incentivizing ongoing and new business operations;
- The David Johnston Research + Technology Park does represent a more modern, viable and well-functioning office-focused "Employment Area", that is located to the west of the ION LRT station and tracks and so is physically separate from the Subject Lands and remainder of the "Employment Area" pocket referenced above. The David Johnston Research + Technology Park also possesses its own, separate transportation network and its viability and attractiveness is largely driven by its affiliation with the University of Waterloo. This viability will likely be enhanced by future mixed-use development to the east of the tracks and on the Subject Lands, which will provide new and proximate housing and supporting commercial business services;
- The Subject Lands in particular are a logical extension to the high density, mixed-use form of development contiguous to the south - a development known as the HUB. The Subject Lands are large enough to accommodate consequential employment density, in combination with over 3,000 high density residential dwelling units, accompanied by a host of retail and service commercial uses, public service facilities and components of a public parkland system.

Given the location and scale of the Subject Lands, reurbanization and intensification will ensure it will not become a fragment of the former "Employment Area", which is anticipated to fully urbanize and intensify with high density land efficient uses over time. Moreover, new development on the Subject Lands will be appropriately designed to be compatible with existing and/or planned land uses;

- > **Section 2.2.5.9, subsection d) of the Growth Plan requires that "the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan"** - As noted, this criterion is subdivided into two parts. The second part of this criterion deals with the issue of ensuring that the proposed conversion would not adversely affect the achievement of the minimum intensification and density target:

- In this case, the issue of an applicable density target is crucial. The Subject Lands are identified as within an MTSA. The Research + Technology MTSA has an overall minimum density target of 160 persons and jobs per hectare;
- However, ROPA 6 establishes a general minimum density target of only 35 jobs per hectare for designated "Employment Areas", including the Subject Lands. By ROPA 6 identifying a significant part of the Research + Technology MTSA within the "Employment Area" designation, including the Subject Lands, the ability of the MTSA to achieve its minimum density target of 160 people and jobs per hectare is adversely affected, as is the ability for the Region and City to achieve their minimum intensification targets.

The lands within the Research + Technology MTSA that are not within the "Employment Area" designation would need to accommodate an increased density of over 250 people and jobs per hectare in order to achieve the minimum density target of 160 people and jobs per hectare for the entire MTSA.

Likewise, less land would be available to accommodate residential intensification within the MTSA, adversely affecting the Region's

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and City's ability to accommodate their ambitious residential intensification targets - including enhanced opportunities to achieve student housing and affordable and attainable housing objectives.

ROPA 6 requires that the City of Waterloo accommodate at least 83% of its forecast residential growth of over 60,000 persons over the next 30 years through intensification. As such, the City will need to optimize development within Strategic Growth Area, like the Research + Technology MTSA, in order to accommodate its growth forecasts and achieve its minimum intensification requirement;

- Removing the Subject Lands from the "Employment Area" designation proposed by ROPA 6 will provide further opportunities to achieve the minimum density target for the Research + Technology MTSA through a mix of higher density residential and employment-generating land uses, which will support the Region's and City's minimum intensification target and growth forecasts;

> **Section 2.2.5.9, subsection e) of the Growth Plan requires that *"there are existing or planned infrastructure and public service facilities to accommodate the proposed uses"*** - To ensure there is appropriate infrastructure and infrastructure capacity available and/or planned to provide the proposed use with water, wastewater and transportation options (including roads, transit and active transportation) and public services facilities:

- The Subject Lands and the Research + Technology MTSA as a whole, are targeted for reurbanization and intensification within both ROPA 6 and the City of Waterloo's Official Plan. The Research + Technology MTSA is already provided with infrastructure, including water, wastewater and transportation options - including the Research + Technology ION LRT Station. Existing infrastructure and transportation options will accommodate some reurbanization and intensification opportunities, given the level of intensification already identified for the Research + Technology MTSA within the City's Official Plan;

- As previously noted, just what type and scale of redevelopment can be provided with existing infrastructure, or what infrastructure upgrades and new public service facilities will be required to accommodate anticipated reurbanization and intensification will be the subject of comprehensive and more detailed planning, which will best occur in tandem with the comprehensive master planning for the MTSA to be undertaken by the City in the short-term. Urban design and engineering studies for the Subject Lands would be carried out once there is confirmation of the "Employment Area" conversion, in support of actual applications for redevelopment; and,

- In addition to existing infrastructure and future comprehensive planning to determine the requirement or infrastructure upgrades, there are also numerous existing public service facilities within the area including:

- + Schools: St. David Catholic Secondary School, Waterloo Collegiate Institute, Winston Churchill Public School, University of Waterloo, Wilfrid Laurier University;
- + Parks/Open Space & Recreational Centres: Sugarbush Park, Laurel Creek, Albert McCormick Community Centre; and,
- + Commercial Services: Numerous restaurants, retail stores, including grocery stores.

In addition to these existing public service facilities, it is anticipated that the comprehensive planning for the future reurbanization and intensification of the Subject Lands and MTSA will include planning for new and expanded public service facilities.

The Proposal Conforms with the Growth Plan Policies for MTSA Planning

In addition to the tests for "Employment Area" conversions established in the Growth Plan, the following analysis considers how a comprehensive mixed-use "Vision" for the eastern half of the MTSA, including the Subject Lands, is representative of good planning and is in the public interest:

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- > **Success is Dependent Upon Comprehensive, Long-Term Planning** - Overall, the Region's Strategic Growth Areas, including the Research + Technology MTSA, need to be considered as long-term opportunities that will continue to evolve well beyond 2031, 2041 and even 2051. They need to be comprehensively planned, with respect to densities and land uses, as well as the municipal service infrastructure and community facilities that will be required. Landowners need certainty of density, land use and service infrastructure in order to work with the local municipality and the Region to achieve long-term success.

It is our opinion that the appropriate planning for the landowners in the Research + Technology MTSA will not happen comprehensively in accordance with the planning objectives and principles for MTSA development outlined in the Growth Plan and ROPA 6 if a substantial proportion of the lands within the MTSA are identified within the "Employment Area" designation. This is particularly true for the Subject Lands which are so centrally and strategically located. As a result, there will be little incentive and reduced opportunities to incorporate new roads, trails, parks and other community facilities, and the population and employment density will be significantly lower on the Subject Lands than it could, and should be;

- > **Accommodating development for the long-term** - The Growth Plan has established a planning horizon to the year 2051. Within Strategic Growth Areas, including Urban Growth Centres and MTSAs, it is crucial to take a long-term view, including consideration of ongoing growth beyond even the 2051 planning horizon. It is our opinion that ROPA 6 does not conform with the intent of the policies for long-term planning provided in the Growth Plan.

Strategic Growth Areas, including MTSAs, take a very long time to develop and, in fact, never truly finish their evolution. The value of comprehensive planning, with the inherent flexibility to ensure that long-term evolution is properly managed, needs to be a primary objective of planning for MTSAs across the Region.

Regional staff indicated to the Prica Team that the "Employment Area" designation on the Subject Lands was to be considered a form of

"phasing". Though Regional staff supported conversion of several other properties within the MTSA, they believed that maintaining the "Employment Area" designation for other lands in the MTSA, including the Subject Lands would act as a de facto phasing requirement by not permitting residential development, and thereby not incentivizing redevelopment, at least until the next MCR.

This forced phasing approach is, in essence, an attempt to "slow" redevelopment of the Research + Technology MTSA. This represents an unnecessary administrative/procedural delay to redevelopment on the Subject Lands, which will delay the delivery of much needed new housing to the Region's and City's housing supply (including opportunities for student housing as well as attainable and affordable housing), as well as higher density employment-generating land uses, which will expand Population-Related and Major Office employment opportunities. This is directly contrary to Provincial priorities as outlined within the various iterations of the Province's Housing Supply Action Plan.

We reject the Region's approach to forced phasing because it inappropriately affects comprehensive planning, both from land use and municipal service infrastructure perspectives. That forced phasing approach also does not recognize the key factors that actually affect development decisions and the timing of development within MTSAs, including the motivation of individual land owners to actually be ready and willing to develop their properties in conformity with the intent of the policies provided in the Growth Plan;

- > **Prioritizing Intensification** - Regional Council has endorsed a growth scenario under the Land Needs Assessment which prioritizes intensification over greenfield development and significantly limits Settlement Area Boundary expansion as a result. As such, significant redevelopment pressure will be placed on the Region's various Strategic Growth Areas, and the MTSAs in particular. The MTSAs, including the Research + Technology MTSA, are well-suited to accommodate new growth and redevelopment through intensification, given their proximity to the Region's ION LRT network. This intensification will help support the significant financial investment that the

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Region and Province have, and are continuing to make in the LRT network.

As noted, the Subject Lands are strategically and centrally located within the Research + Technology MTSA. The Subject Lands are significant in scale, providing the opportunity to accommodate new forms of mixed-use development and significantly higher densities than currently exist, including:

- Substantive employment generating land uses including office uses, institutional uses, retail and service commercial uses, hotels and restaurants;
- Community facilities and parks and open spaces; and,
- More than 3,000 dwelling units (depending on density permissions provided in subsequent planning documents), including opportunities for student housing and affordable and attainable housing;

> **Commitment to Transit-Supportive Development**

- With the firm commitment to reurbanization and intensification, as espoused by Regional Council's support for the enhanced intensification growth scenario, comes the need to firmly commit to the principles of Transit-Supportive Development to establish a long-term understanding of the potential of all of the Region's MTSA's to accommodate growth to 2051 and beyond.

Transit-supportive development makes transit viable and improves the quality of the experience of using transit. Transit-supportive development is a well-defined term in both Provincial and Regional policy documents, and refers to compact, mixed-use development that has a high level of both employment and residential densities.

Transit-Supportive Development will be consistent with Ontario's Transit-Supportive Guidelines, which provide guidance and direction to Ontario's municipalities, with *"significant emphasis on creating a pattern of development within existing communities and new development that is capable of supporting increased transit ridership in exiting systems and helping to facilitate the*

establishment of new transit systems." (Transit-Supportive Guidelines, 2021, Page 1);

- > **Establishment of 15-Minute Neighbourhoods and Complete Communities** - Transit-Supportive Development is based upon attracting a range and mix of higher density land uses, including office and major office uses, retail and service commercial uses, and residential uses, all linked together with a high quality public realm, including roads, active transportation facilities and parks. This focus on a range and mix of higher density land uses is also crucial to the establishment of 15-minute neighbourhoods, which is a priority objective of ROPA 6. ROPA 6 defines 15-minute neighbourhoods as:

"compact, well-connected places such as mixed-use neighbourhoods... that offer and support opportunities for people of all ages and abilities and at all times of year to conveniently access the necessities for daily living with a 15-minute trip by walking, cycling and rolling, and where other needs can be met by taking direct, frequent, and convenient transit, wherever possible. 15-minute neighbourhoods include an appropriate mix of jobs, local stores, and services, and a full range of housing, transportation options and public service facilities." (Region Official Plan Amendment No. 6, Adopted – Definition of "15-minute neighbourhoods")

The 15-Minute Neighbourhoods concept is similar to the concept of Complete Communities as defined and promoted by the Growth Plan. The Growth Plan clearly considers Complete Communities as the ideal model for reurbanization and intensification, and as a means to most efficiently make use of infrastructure and public services facilities, and support public transit investment.

ROPA 6 likewise views 15-Minute Neighbourhoods as the ideal model for urban development in the Region and specifically along the ION Light Rail Transit Network (Policy 2.A.4(d)). As such, this form of development should be planned and promoted for the MTSA's in particular.

The requested removal of the Subject Lands from the "Employment Area" designation in ROPA 6 will allow for true mixed-use redevelopment, potentially incorporating a range and mix of higher density office, commercial, residential and

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institutional uses. Providing this mix of uses, and the jobs that come with that mix, including significant new housing options directly supports the development of a 15-Minute Neighbourhood and Complete Community within the Research + Technology MTSA, and specifically on the Subject Lands;

- > **Create a Rational, Regional Urban Structure** - The Growth Plan lays out the Province's growth management blueprint for the entire Greater Golden Horseshoe. The intent of the Growth Plan as it specifically relates to the Region of Waterloo, is to allocate and distribute future growth to the various constituent lower-tier municipalities, and to establish a growth management framework that ensures that growth is accommodated in a way that optimizes infrastructure investment, creates and sustains Complete Communities, and supports the Region's overall vitality.

An integral component of the growth management framework is a strengthened focus on reurbanization and intensification and the establishment of a rational urban structure that is focused on Strategic Growth Areas, including MTSA's - where higher densities of development and a broader mix of uses are planned and promoted.

Another key component of the rational urban structure is the various MTSA's, including the Research + Technology MTSA, which are defined as:

"The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. MTSA's generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk." (Growth Plan for the Greater Golden Horseshoe, 2020, Definition of "Major Transit Station Area").

The Growth Plan requires municipalities to delineate the boundaries of MTSA's along Priority Transit Corridors *"in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station"* (Growth Plan for the Greater Golden Horseshoe, 2020 – Section 2.2.4.2).

The requested "Employment Area" conversion of the Subject Lands reflects and supports multiple policy objectives of the Growth Plan, including promoting reurbanization and intensification, creating and sustaining Complete Communities, and successfully coordinating land use planning, transportation planning and infrastructure investment. ROPA 6 has identified the boundaries of the Research + Technology MTSA, which includes the Subject Lands. The Subject Lands are within 300 to 800 metres of the Research + Technology ION LRT Station.

In addition to requiring municipalities to delineate MTSA's and in support of the principles outlined above, the Growth Plan also requires municipalities to plan MTSA's along Priority Transit Corridors to achieve a minimum density target of 160 residents and jobs combined per hectare for areas that are served by light rail transit or bus rapid transit. The Growth Plan also requires development within MTSA's to be supported, where appropriate, as identified in Section 2.2.4, subsection 9 of the Growth Plan, which states:

"9. Within all major transit station areas, development will be supported, where appropriate, by:

- a) planning for a diverse mix of uses, including additional residential units and affordable housing, to support existing and planned transit service levels;*
- b) fostering collaboration between public and private sectors, such as joint development projects;*
- c) providing alternative development standards, such as reduced parking standards; and*
- d) prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities."*

It is important to note that this policy is intended to support development within MTSA's. The policy clearly recognizing the importance of establishing a supportive local planning framework to direct and encourage reurbanization and intensification within MTSA's. This is important

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considering that many MTSA's are within existing developed areas, including many former industrial and business park employment areas.

As such, a supportive local planning framework is imperative in order to establish planning conditions that will support and in effect incentivize reurbanization for higher density, mixed-use development, including new residential development. This requires comprehensive planning to establish a supportive local planning framework, ensuring the required minimum density is achieved or surpassed. The Subject Lands has the opportunity to help the Region and the City achieve their important city-building objectives, in conformity with this policy of the Growth Plan. The designation of the Subject Lands as "Employment Area", in our opinion, frustrates the achievement of these objectives;

- **Land Uses that Adversely Affect Achieving Density Targets are NOT Permitted** - One of the most important considerations for the long-term planning of the Research + Technology MTSA is the inclusion of about 40% of the MTSA within the "Employment Area" designation, which will negatively impact the ability to achieve the minimum density target. Section 2.2.4.6 of the Growth Plan, specifically states that:

"Within MTSA's on priority transit corridors or subway lines, land uses and built form that would adversely affect the achievement of the minimum density targets in this Plan will be prohibited."

Further, Section 2.2.4.9 of the Growth Plan, states:

"Within all major transit station areas, development will be supported, where appropriate, by:"...

"d) prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities."

Through these policies, the Growth Plan recognizes the impact of land uses that do not support the long-term objective of dense, mixed use development and Complete Communities in the context of MTSA planning. Large-scale, low density employment uses served by large surface parking lots, while an important economic

requirement within the Region, should be appropriately located in traditional business parks with access to the Regional/Provincial Highway System, and specifically not within an MTSA.

The Subject Lands are currently representative of this large-scale, low density, traditional business park built form, consisting of a large and vacant, one-storey industrial building surrounded by large surface parking lots and vacant, unused space. It is exactly this type of land use/built form that must be prohibited within the Research + Technology MTSA.

The reason that Sections 2.2.4.6 and 2.2.4.9 of the Growth Plan are important for long-term planning is the recognition that these land extensive, low density forms of development have a pernicious effect on the achievement of most of the stated city-building objectives, and the overall intent of why MTSA's have been established in the first place. For example:

- Overall, the Research + Technology MTSA, as it is defined in ROPA 6, comprises a gross area of approximately 198 hectares and of this, approximately 115 hectares are planned to be re-developed with higher density, mixed use forms of development. The remaining 82 hectares, including the Subject Lands, are proposed to be included within the "Employment Area" designation. The Region has assumed that its Employment Areas will accommodate an overall density of just 35 jobs per hectare; and,
- In order to achieve the minimum density target of 160 people and jobs per hectare overall, the portions of the Research + Technology MTSA that are not within Employment Area designation will need to accommodate an increased density of nearly 250 people and jobs per hectare to offset the reduced density anticipated for areas that are proposed to be within the "Employment Area" designation.

From an urban structure perspective, the inclusion of the "Employment Area" designation on the Subject Lands will effectively create a low density employment land barrier between higher density, mixed-use areas to the west of Phillip Street and to the east of Albert Street.

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As a result, the low density Employment Land Employment uses that are located central to the Research + Technology MTSA, and which feature expansive surface parking and vacant space, would not be expected nor incentivized to reurbanize to a more urban, higher density and mixed-use form that would better support the Province's and Region's objectives related to transit-supportive development, Complete Communities and 15-minute neighbourhoods. It will also:

- Be a barrier for appropriate and accurate, long-term planning for municipal infrastructure, including road improvements, the development of Active Transportation facilities, as well as adequate sewer, water and storm water management system planning;
 - Create an inappropriate relationship of land uses and built forms within the Research + Technology MTSA; and,
 - Place an undue burden on other lands within the MTSA to make up the density shortfall. The increased density will also limit opportunities to incorporate community facilities and infrastructure and will likewise limit design options and flexibility, given the need to accommodate a much higher density of development on less land; and,
- > **Employment Uses to be Required Through Policy**
- It is acknowledged that the Region will need to accommodate significant employment growth, as well as population growth. The Region should recognize that the redevelopment of the Subject Lands, if removed from the "Employment Area" designation, will not necessarily result in reduced employment opportunity. As noted, the objective for these lands can include opportunities for Major Office development, more typical office development as well as a full range and mix of Population-Related employment opportunities including institutional uses, retail and service commercial uses and public service facilities. This objective can easily be enshrined in policy as a requirement going forward.

The Proposal Conforms with the Additional Conversion Criteria from the Region

In addition to Section 2.2.5.9 of the Growth Plan, the requested removal of the Subject Lands from the "Employment Area" designation in ROPA 6 also conforms with the additional criteria established by the Region which were utilized to review requests for "Employment Area" conversion through their MCR process, as well with the Region's more general growth management framework:

- > **Cross-jurisdictional issues have been addressed** - To reduce cross-jurisdictional issues by ensuring issues are not only considered, but addressed:
- The Subject Lands are entirely within the municipal boundary of the City of Waterloo, and do not abut any other municipal boundary. As such, no cross-jurisdictional issues are anticipated. However, in consideration of multi-jurisdictional planning objectives related to achieving the planned urban structure, the "Employment Area" conversion request is expected to facilitate Transit-Supportive Development within the defined Research + Technology MTSA, which will support the planned Regional Urban Structure and the investment in higher order transit, as well as related planning policy objectives;
- > **The site does not have particular or special employment use appeal based on its proximity to major transportation infrastructure** - To protect strategically located "Employment Areas" for Employment Land Employment uses that require convenient access to major good movement corridors that require heavy truck or rail traffic, such as warehousing and logistics, and offer highway frontage, which is desirable for attracting new investment:
- The isolated "Employment Area" pocket designated within the Research + Technology MTSA, including the Subject Lands, does not have convenient access to major goods movement corridors, or a highway interchange, nor does it offer highway frontage or access to the Waterloo International Airport. Without these locational attributes, the Subject Lands and the isolated "Employment Area" pocket

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within the MTSA more generally are not appropriate for low density, land extensive Employment Land Employment uses;

- Recognizing the lack of locational attributes, the Subject Lands have not been identified as a strategically located or important "Employment Area" within the Province's planning documents, or the Regional or City Official Plans. The ongoing use of these lands exclusively as a single function "Employment Area" is not considered to have any particular or special appeal from a Provincial, Regional or City-wide perspective;
- It is evident, based on an evaluation of the area surrounding the Subject Lands and within the associated "Employment Area" designation that the existing development pattern is underperforming. Large footprint low-rise buildings, many of which are largely vacant, with an associated supply of expansive surface parking are a legacy of the past.

The Subject Lands and MTSA as a whole are needed to redevelop at substantially higher densities, in accordance with the principles of Transit-Supportive Development, providing a major opportunity for reurbanization and intensification within the City;

- > **The conversion shall support existing or planned Regional or Area Municipal planning objectives -**
To ensure that the conversion does not unnecessarily hinder or compromise other planning objectives that Regional or Area Municipal Councils have established:

- It is understood that there is a policy directive and a desire to ensure that the Region and City are well positioned to attract economic opportunities over the long term. This desire is linked to the protection of land areas for employment generating land uses, and particularly those Employment Land Employment uses that struggle to compete with higher value commercial, institutional and residential land uses.

The City of Waterloo has very limited potential for greenfield development opportunities left to accommodate future growth, placing low

density, land extensive employment uses under increasing threat of conversion to other higher value land uses;

- At the same time, the City is anticipated to experience minimal if any Employment Land Employment growth over the next 30 years, with 95 to 99% of all new employment growth being for Major Office and Population-Related Employment, which should be directed to Strategic Growth Areas, including MTSA's and away from designated "Employment Areas";
- The City's Official Plan identifies a range of "Employment Areas", one of which is identified as a Provincially Significant Employment Zone, and through ROPA 6 the Region has identified 456 hectares of "Employment Area" which can accommodate forecast growth to the 2051 planning horizon;
- As discussed previously, the Subject Lands and the larger "Employment Area" that they are within are no longer a viable or an appropriate location for low density, land extensive uses that they currently accommodate. The City's Official Plan acknowledges this evolution by identifying the Subject Lands for reurbanization and intensification;
- The proposed mixed-use redevelopment of the Subject Lands will provide opportunities for over 3,000 new high density housing units, and will likely also create substantive employment opportunities, much greater than a traditional low-density industrial/business park would.

The high density mixed-use opportunity on the Subject Lands facilitated through its conversion will support the ongoing evolution of the Regional and City economies, providing a greater emphasis on the service sector and creative industries, and will likewise also support numerous other city-building objectives and planning policies, goals and requirements, including assisting in the achievement of:

- + The City's minimum intensification target of 83% for new residential development , as identified in ROPA 6;

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- + The minimum density requirement of 160 persons and jobs per hectare for the Research + Technology MTSA; and,
 - + ROPA 6's focus on prioritizing 15-minute neighbourhoods which, like complete communities, provide a mix of uses supported by transportation infrastructure that offer residents the ability to access all of their daily needs with a short walk or transit trip;
- > **The establishment of a Regional Urban Structure, focused on an interconnected system of higher density centres and corridors, served by a higher order transit system:**
- A Regional Urban Structure has been established and recognized in the Region and City's Official Plans for some time. Generally, the structure is focused on the Central Transit Corridor and includes a system of Urban Growth Centres, other designated Nodes and Corridors and MTSAs;
 - The Subject Lands and associated "Employment Area" are located within the Research + Technology MTSA. The Subject Lands are ready to redevelop at substantially higher densities in accordance with the principles of Transit-Supportive Development, providing a significant opportunity to the Regional and local growth management framework; and,
 - Rather than hinder or compromise this foundational objective of the City's and Region's Official Plans and the Province's Growth Plan, the requested conversion, which does not eliminate employment generating land uses on the Subject Lands, will fully support the establishment of the Regional Urban Structure. Ensuring the opportunity for the entire MTSA to transform into a high density, mixed-use centre will support investment in the Research + Technology MTSA;
- > **The requirement that a substantial amount of new growth be directed to existing urban areas, and particularly to the key elements of the Regional Urban Structure, through urbanization and intensification:**
- The City's Official Plan states that *"Waterloo is transforming from a low-rise suburban community to a more compact urban form, particularly within the Uptown Waterloo Urban Growth Centre, other designated Nodes and Corridors and MTSAs."* (Waterloo Official Plan, 2020 – Chapter 3);
- Further, the City's Official Plan identifies that *"growth will be increasingly accommodated through intensification within the existing Built-Up Area in key reurbanization areas including: the Uptown Waterloo Urban Growth Centre, other designates Nodes and Corridors and Major Transit Station Areas."* (Waterloo Official Plan, 2020 – Chapter 3);
- There is a very limited supply of additional greenfield lands within the City to accommodate new growth. As a result, a significant majority of all new projected growth to 2051 will need to be accommodated through significant reurbanization and intensification initiatives;
 - The Subject Lands and the entirety of the associated "Employment Area" are located within the Research + Technology MTSA. MTSAs generally have an important role to play in accommodating future growth - both residential and employment growth - in the long term. MTSAs are expected to accommodate significant reurbanization and intensification, with a particular focus on accommodating Transit-Supportive Development;
 - Rather than hinder or compromise this foundational objective of the City's Official Plan, the Region's Official Plan and Province's Growth Plan, the conversion of the Subject Lands, which does not eliminate employment generating land uses, will fully support the accommodation of growth through reurbanization and intensification.
- The introduction of high density residential uses, in conjunction with consequential employment generating land uses, will achieve the dual objective of accommodating future population and employment growth projections. The Subject Lands provide an unrivaled opportunity to create a land efficient, Complete Community, which is desirable as it will

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deliver a multitude of “opportunities for people at all stages of life to live, work, learn, shop, and play in close proximity” (City of Waterloo Official Plan, 2020 – Section 2.3(4));

> The need to achieve the principles of Transit-Supportive Development:

- ROPA 6 identifies in Section 2.D.2, a number of policies for Transit-Supportive Development focusing on connectivity, access to transit stops, walkability and a mixture of land uses at medium to high density. In addition, the City of Waterloo’s Official Plan includes a policy framework applicable to MTSA’s throughout the City. Section 3.8 states:

“the City will plan for densities in MTSA’s to increase over time, with 160 residents and jobs combined per hectare being the planned density target for 2041. The City will review and increase density targets through future Official Plan Reviews, and future City-initiated Official Plan Amendments” going on to identify that:

“Major Transit Station Areas will be planned to:

- Achieve, by 2041 or earlier, a minimum gross density target of 160 residents and jobs combined per hectare, which will be achieved by:*
 - Establishing minimum residential and non-residential densities in the Zoning By-law”...*
- Accommodate a mix of transit supportive land uses that create both origins and destinations for transit users.*
- Be focal points for active transportation networks, with connections other destinations.*
- Support the unique character of each of the station areas and create attractive places for working, learning, living and recreation.*

e. Stimulate place-making through public and private realm improvements, public art, new open spaces and enhanced amenity.”...

“g. Support connectivity, integration and transfers between mobility systems.”

- Section 3.8.1, subsection (2) “Land use within MTSA’s” of the City’s Official Plan identifies:

“as a general principle, and subject to the detailed land use policies of this Plan, transit-supportive uses such as medium to high density residential, commercial and/or employment uses shall be encouraged in MTSA’s, as set out in Station Area plans. Non-transit supportive uses such as lower density office uses or commercial uses oriented to vehicular travel will be discouraged”;
- Overall it is clear that the principles of Transit-Supportive Development, as articulated in both the City’s Official Plan and Region’s Official Plan, include a number of principles that are all interrelated and important. Further, it is crucial to remember that, with respect to this request for an “Employment Area” conversion of the Subject Lands, Prica is not requesting permission to eliminate the requirement to provide employment generating land uses, but rather the opportunity to create a vibrant high density, mixed-use community that includes consequential employment generating land uses, along with over 3,000 high density residential land uses, in keeping with the stated principles of Transit-Supportive Development within the Research + Technology MTSA; and,
- The Subject Lands provide an unrivaled opportunity to create a land efficient, Complete Community that is desirable and capable of delivering a multitude of “opportunities for people of all stages of life to live, work, learn, shop and play in close proximity” (City of Waterloo Official Plan, 2020 – Section 2.3(4)). The Subject Lands can deliver significant support for the investment in higher order transit within the Research + Technology MTSA.

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4. PROMOTING A LONG-TERM VISION

Six Key Pillars

The successful achievement of the reurbanization and intensification of the Research + Technology MTSA is expected to take a long time, well beyond the 2051 planning horizon established by Provincial legislation, as well as substantial investment in upgrades to municipal service infrastructure, the road network and community facilities, including an urban parkland system and active transportation facilities.

To begin the discussion about planning for the Research + Technology MTSA, the Prica Team envisions, for the east part of the Research + Technology MTSA, the creation of a state-of-the-art, sustainable community that provides “opportunities for people at all stages of life to live, work, learn, shop and play in close proximity” (City of Waterloo Official Plan, updated January 2020 – Section 2.3(4)).

The envisioned mixed-use, complete community would be built on the principles of Transit-Supportive Development, and would fully support the planned Regional Structure, and in particular the enhanced focus on reurbanization and intensification, as well as the significant investment made by the Region and Province in higher order public transit.

In addition to achieving and exceeding the minimum density target established by the Growth Plan, the Prica Team envisions long-term planning and development based on the following six key pillars that will guide the creation of a Complete Community, with opportunities for people of all ages and abilities to access all of the necessities for daily living, “including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public services facilities” (Growth Plan, 2020 – Definition of “Complete Communities”):

- > **Develop a complete community where people can live, work, shop, and play** - The future planning and development of the Research + Technology MTSA must present a truly mixed-use environment, with a diverse range and mix of land uses throughout the MTSA, including residential, commercial, office and institutional uses. A diverse mix of uses is an integral component in the creation of Complete Communities and will best

support existing and future transit and active transportation improvements;

- > **Provide for a range of housing typologies and tenures, including the provision of affordable units** - Housing options in a variety of forms must be included, supporting the vibrancy of the community. Without a significant housing component that includes opportunities for student housing as well as affordable and attainable housing types, the Research + Technology MTSA cannot be a viable Complete Community. The Prica Team is looking forward to collaborating with the Province and City of Waterloo to ensure that an appropriate percentage of planned dwelling units will be available as affordable and attainable housing;
- > **Ensure Employment Viability** - There is limited demand for stand-alone, lower density employment development, especially within the eastern half of the Research + Technology MTSA. As such, unless a supportive planning framework is established that permits true mixed-use development, including the introduction of residential uses, Major Office uses and Population-Related Employment uses, it is likely that much of the existing low density employment development will remain in its current form for the long-term. This will make it increasingly difficult to achieve the minimum density target required by the Growth Plan, to take advantage of the large and well-educated talent pool associated with the nearby universities and college, and to comprehensively plan for the reurbanization and overall evolution of the Research + Technology MTSA into a Complete Community.

The employment landscape has already changed significantly in Waterloo after the downsizing of Research in Motion in 2005. In addition, the employment market has further diversified in light of the COVID-19 pandemic. Today, being flexible is crucial to the long-term success of the Research + Technology MTSA as an economic generator for the Region and City. Planning must be long-term and flexible to accommodate changing market conditions over time.

Providing a range of options for Major Office and Population-Related Employment uses, with flexibility to accommodate an ever-changing urban

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landscape, is crucial to remaining competitive with other Regions, municipalities and communities. To achieve this, areas for dedicated office space, mixed-use employment, retail and housing options should all be identified. A more sustainable and vibrant employment-generating community can be achieved by introducing a greater mix of uses that support a model for work, play, live and learn, and take advantage of the abundant talent pool in the nearby post-secondary educational institutions and throughout the Region, City and Province;

- > **Promote Sustainability and Respond to a Changing Climate** - The larger concepts of sustainability, resiliency and an appropriate response to climate change, must be supported through a number of key planning policy concepts in the comprehensive planning for the Research + Technology MTSA, including:
 - Require higher density, mixed-use development;
 - Support a multi-modal transportation system; and,
 - Require integration of green building/green infrastructure technologies.

Prica looks forward to working with the Province the Region and the City of Waterloo in establishing a state-of-the-art community that is focused on the key elements of sustainability. For example, Prica has already developed a large-scale geothermal system for The HUB, a high density, mixed-use development comprised of eight buildings and located immediately to the south of the Subject Lands, which contributes to the heating and cooling of residential and commercial units and which is planned to be expanded to other projects as a District Energy System;

- > **Establish a public realm system comprised of a hierarchy of amenities and open spaces** - Destinations and recreational spaces in the Research + Technology MTSA will create opportunities to entertain residents and employees and foster a sense of community. There are two key components: the built environment and green space. These elements are intended to achieve a strong

identity, while providing important urban amenities.

Long-term, comprehensive planning must consider a host of opportunities to provide the full spectrum of parkland and open space options, including an urban park hierarchy, which will support the increased residential and employment populations and provide opportunities for active and passive recreation. The conversion of the Subject Lands provides an excellent opportunity to accommodate an excellent and enhanced public realm network. Its central location is considered strategic, and will become an important component of the parks system, and Active Transportation network;

- > **Build upon the existing streets to create a fine-grained, connected movement network** – A network of new local streets is required, which will allow for efficient vehicular and pedestrian travel and split up the large employment land parcels into more finely scaled blocks that allow for higher density, mixed-use development. Additional transportation options will be added including local public transit and enhanced Active Transportation connections that will support and provide improved access to the Research + Technology ION Light Rail Transit Station, and throughout the MTSA. Again the strategic aspect of the Subject Lands as a central component of the MTSA cannot be understated.

The Role of the Prica Properties in the Research + Technology MTSA

As previously noted, Prica has made a substantial investment within the Research + Technology MTSA. It is recognized that the Research + Technology MTSA is an area that will begin to transform, starting with the formation of a supportive planning framework that promotes a broader vision for the entire area as a mixed-use, higher density district, which reflects and implements the Province's, the Region's and the City's relevant policies, goals and objectives for MTSA's.

The following identifies the role and function of each of the Prica properties in achieving the opportunity to create a land efficient, Complete Community and "15-minute neighbourhood" that is *"compact, vibrant*

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and where people can meet their daily needs within a 15-minute trip by walking cycling and rolling” (ROPA 6, Adopted – Section 1.2.3,);

- > **The Role of the Subject Lands** - The Subject Lands can deliver significant support for the investment in higher order transit with the Research + Technology MTSA. The Subject Lands represent a vital reurbanization opportunity and structural component for the redevelopment of the MTSA because they are large in scale, and are centrally and strategically located. On their own, the Subject Lands occupy five percent of the total MTSA land area. The Subject Lands have frontage along both Phillip Street and Albert Street, the two primary collector roads that run through the eastern portion of the MTSA. As such, redevelopment of the Subject Lands offers the opportunity to incorporate new local streets and active transportation connections, which will increase permeability and support a more pedestrian friendly environment with multi-modal transportation options.

The Subject Lands are at the heart of the future community. The Subject Lands have the potential to deliver over 3,000 new residential units, including opportunities for student housing and affordable and attainable housing.

Realized early, the redevelopment of the Subject Lands, as facilitated by the requested conversion, would act as a catalyst for the redevelopment of the surrounding area while also setting the character tone for the new Complete Community.

Overall, the Subject Lands represent a key structural component of the MTSA, and optimizing reurbanization opportunities on the Subject Lands is imperative in order to achieve an appropriate vision for this crucial part of the Region and City-wide urban structure; and,

- > **The Role of the other Prica Properties** - In addition to the Subject Lands, other lands owned by Prica within the Research + Technology MTSA include:
 - **130 Columbia Street West and 365 Albert Street – The HUB** - Built between 2016 and 2017 and located directly south of the Subject Lands, The Hub is a mixed-use, high-density development comprised of five 14-storey

buildings, one 8-storey building and two 6-storey buildings, located around a dedicated pedestrian promenade.

The HUB was a transformative development project, providing a mix of uses in a high density, urban format, supported by one of the largest open loop geothermal systems in North America. Although The HUB has already been developed, it represents a gateway into the Research + Technology MTSA and can serve as a benchmark for future mixed-use redevelopment in proximity;

- **446 Albert Street** - Located just to the northeast of the Subject Lands, along the eastern border of the MTSA, 446 Albert Street represents another integral redevelopment opportunity being occupied by a vacant, large former industrial facility. The vacant former industrial facility occupies roughly half of the site, with the other half being occupied by paved and gravel areas that were used for surface parking, vehicular circulation and outdoor storage. At 4.7 hectares in size, the redevelopment of the 446 Albert Street site will contribute significantly to achieving the minimum density target for the overall MTSA, and will likewise significantly enhance the pedestrian environment and overall character of the area; and,
- **156 & 160 Columbia Street West, and 385 & 405 Phillip Street** - This future gateway site, located at the southern boundary of the Research + Technology MTSA and being 3 hectares in size, very close to the University of Waterloo campus, provides the opportunity to accommodate a landmark redevelopment proposal that signifies the MTSA’s transformation into a mixed-use, high density complete community. 160 Columbia currently contains a one-storey commercial building while 156 Columbia contains a one and two-storey office building. Both buildings are surrounded by surface parking lots.

385 and 405 Phillip Street are both entirely comprised of surface parking lots which are remnants of the area’s former high-tech employment function. These assembled properties provide the opportunity for future

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redevelopment and for the introduction of new local streets and active transportation connections, providing enhanced connectivity to the Research + Technology ION Light Rail Transit Station.