



June 18, 2025

Lindsay Clark  
 Ministry of Municipal Affairs and Housing  
 Municipal Services Office - Western Ontario  
 659 Exeter Road, Floor 2  
 London, ON N6E 1L3

Dear Ms. Clark:

**RE: Approval to Amend a Municipality's Official Plan (OPA 58)/ ERO Number: 025-0203  
 Ministry Reference Number 30-OP-252866 / 209, 215 & 217 King Street S., 11 John St. W  
 and 176, 180 and 182 Caroline Street S., Waterloo, "King and John Site"  
 OUR FILE Y5122G**

We are writing on behalf of 6965083 Canada Inc. (care of BGO), the registered owner of the above noted properties (referred to collectively as the "subject lands"). The subject lands are currently located within the Uptown Waterloo Primary Node and are within a Protected Major Transit Station Area (PMTSA).

The subject lands are approved to be developed with two residential towers. The subject lands were rezoned through a site-specific zoning application that was submitted to the City of Waterloo in 2017 and ultimately approved by the Ontario Land Tribunal in 2022. Unfortunately, the proposed built form and unit mix of the project as originally approved in 2022 is no longer viable from a market perspective. As such, BGO has been exploring opportunities with the City to increase the density of the project while generally staying within the framework of the original approval.

Our client participated in the City's Official Plan review process, including the submission of formal comments, in response to both the initial draft OPA and the 2<sup>nd</sup> draft OPA. Our letters confirmed our client's support of the City's proposed removal of prescribed maximum densities that would encumber prime intensification sites like the subject lands. Our letters also supported the City's proposal to increase height permissions within its PMTSA areas. However, in our correspondence we also voiced BGO's support for further height increases beyond the 30-storey limit being contemplated by the City. Lastly, our correspondence raised concerns about the potential loss of standalone residential permissions on the subject lands.

In consultation with City staff, BGO agreed to a deferral of OPA 58 as it relates to the subject lands in order to further review our comments with City planning staff. Since the December 2024 Council approval of OPA 58, we have been working closely with City of Waterloo Planning Staff and have

arrived at a potential site-specific policy resolution that is scheduled to come before City Council on July 14, 2025 (the "Proposed Resolution").

If the Proposed Resolution is accepted by City Council, it will better position the subject lands to deliver housing in the future (including the potential for rental housing). However, should OPA 58 be approved by the Minister per ERO posting 025-0203 without the Proposed Resolution a site-specific OPA will be required to implement the Proposed Resolution. This will delay planning policy certainty on the subject lands and thus potentially delay future housing development.

**We are writing to respectfully request that the Proposed Resolution, if endorsed by City of Waterloo Council for the subject lands, be incorporated as a Minister's modification to OPA 58 and implemented as part of the Minister's forthcoming decision. This is the preferred approach of both the City and our client. Incorporating an agreed upon policy resolution for the subject lands, should one be approved by Council in July, as part of OPA 58 will provide for certainty in terms of permitted height and density on the subject lands, which in turn provides BGO with the confidence to explore near-term development on the subject lands to deliver needed housing within Waterloo. It would also avoid a time-consuming and costly follow-up site-specific OPA process without causing undue delay to the Minister's Decision respecting OPA 58.**

Thank you for your consideration.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read "Andrea Sinclair", with a long horizontal stroke extending to the right.

Andrea Sinclair, BES, MUDS, MCIP, RPP

cc. BGO