



Zelinka Priamo Ltd.

LAND USE PLANNERS

July 2, 2025

Honourable Paul Calandra, Minister of Municipal Affairs and Housing
C/O Municipal Services Office – Central Ontario
777 Bay Street, 13th Floor
Toronto, ON
M7A 2J3

Dear Minister Calandra:

Re: Comments and Request to Modify City of Waterloo Official Plan (OPA 58) ERO # 025-0203/Ministry Reference 30-OP-252866 Preliminary Comments on Behalf of Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited 650-660 Erb Street West, Waterloo, ON
Our File: CAT/WAT/23-01

We are the planning consultants for Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited (collectively known as “Canadian Tire”), which are the registered landowner and tenant of lands known municipally as 650-660 Erb Street West, Waterloo (the “Canadian Tire Lands”).

BACKGROUND

The Canadian Tire Lands are approximately 3.4 ha (8.4 ac) in area and are currently developed with an existing Canadian Tire store and associated garden centre, along with an A&W restaurant and a Canadian Tire Gas Bar and Car Wash.

Canadian Tire continually assesses the potential for store expansions. On October 12, 2022, a Zoning By-law Amendment was approved (File No. Z-23-09) to facilitate the expansion and a pre-application request for Site Plan Approval (City File no. PC-23-14) resulted in a Site Plan Review Committee Report dated January 12, 2024. At this time, an application for Site Plan Approval has not been submitted.

On behalf of Canadian Tire, we have been monitoring the City of Waterloo’s Official Plan Review (Phase 1). For the Draft Official Plan dated June 2024, we submitted preliminary comments dated August 28, 2024, and met with Planning Staff on October 15, 2024. A draft of OPA 58 (with associated Draft schedules) dated November 2024 was released for review and comment with a Public Meeting held on December 2, 2024, and we provided preliminary comments on December 2, 2024.

COMMENTS AND REQUESTED MODIFICATIONS

We have the following comments and requested modifications for the new City of Waterloo Official Plan:

- Draft Policy 3.5.4(3) states “Construction of new low rise uses will be discouraged within designated Nodes, Major and Minor Corridors and Major Transit Station

Areas. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter". The Staff Report IPPW2024-061 Staff response to our August 28, 2024, comment states "Existing low-rise sites may continue. Policies discourage low rise redevelopment but do not prohibit them." **In our submission, additions to existing low-rise buildings and other interim development should not be discouraged and accordingly "Where appropriate," should be added before "construction of new ..." to provide clarity as to the policy intent;** and

- New Policy 10.2.2.3(4) states "Mixed-Use Community designated areas located in Minor Node or Minor Corridors shall generally be zoned to permit a range of small to mid-size commercial and mixed uses." The Staff Report IPPW2024-061 Staff response to our August 28, 2024, comment states "Permissions for large scale commercial uses are still in place within the Mixed-Use Community Designation". **In our submission, "and large-scale" prior to "commercial and mixed uses" would provide clarity that large scale retail stores (i.e., the Canadian Tire store) are permitted. Accordingly, we suggest that Policy 10.2.2.3(4) be modified to "Mixed-Use Community designated areas located in Minor Node or Minor Corridors shall generally be zoned to permit a range of small to mid-size and large-scale commercial and mixed uses."**

In our submission, the proposed modifications are consistent with the Provincial Planning Statement and represents good planning.

Please kindly ensure that the undersigned is notified of any further studies, modifications, approvals and/or notices with respect to this posting. We reserve the opportunity to provide further comments in the event that additional information becomes available.

Yours very truly,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Canadian Tire Properties Inc. and Canadian Real Estate Limited (via email)

- encl. Letter to the City of Waterloo Community Planning, dated August 28, 2024
encl. Letter to the City of Waterloo Mayor and Members of Council, dated December 2, 2024
encl. City of Waterloo Staff Report IPPW2024-061, dated December 2, 2024



Zelinka Priamo Ltd.

LAND USE PLANNERS

VIA EMAIL

August 28, 2024

Community Planning
Integrated Planning & Public Works
City of Waterloo
100 Regina Street South
Waterloo, ON
N2J 4A8

Attention: Ric Martins, Senior Policy Planner

**Re: City of Waterloo Official Plan Review (Phase 1)
Public Meeting, OPA No. 58 (June 2024 Draft Official Plan)
Preliminary Comments on Behalf of Canadian Tire Properties Inc. and
Canadian Tire Real Estate Limited
650-660 Erb Street West
Waterloo, ON
Our File: CAT/WAT/23-01**

We are the planning consultants for Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited ("Canadian Tire"), which are the registered owner and tenant of lands known municipally as 650-660 Erb Street West, Waterloo (the "Canadian Tire Lands"). The Canadian Tire Lands of approximately 3.4 ha (8.4 ac) are currently developed with an existing Canadian Tire store and associated garden centre, along with an A&W restaurant and a Canadian Tire Gas Bar and Car Wash.

On behalf of Canadian Tire, we have been monitoring the City's Official Plan Review. It is our understanding that a Draft Official Plan dated June 2024 with associated Draft schedules was released for review. It is our understanding from Staff Report IPPW2024-005, dated June 24, 2024, and the Council Meeting on June 24, 2024, that Council directed Staff to bring a final draft Official Plan (Chapters 3, 10 and 12) with modifications to Council for its consideration, after consulting with the public and interested parties. Based upon our review of the June 2024 Draft Official Plan, on behalf of Canadian Tire we have preliminary comments as outlined below and will continue to review the June 2024 Draft Official Plan in more detail and may provide further comments, as required.

BACKGROUND

Current Official Plan

The Canadian Tire Lands are currently designated Commercial and Mixed-Use Neighbourhood Commercial according to Schedules A and A1 of the City of Waterloo Official Plan, respectively. The subject lands are shown within a Minor Node on City

Structure Schedule B. The subject lands are within the Clair Hills District (Schedule C), are Designated Greenfield Areas (Schedule B3) and are located in WPSA-8 according to Schedule B4. Specific Provision Area 8 – West Side Nodes is applicable to the subject lands for the Minor Node at the intersection of Erb Street and Erbsville/Ira Needles Boulevard. Under the Clair Hills District Implementation Plan, the Canadian Tire Lands are shown as Mixed-Use Activity Node on the Clair Hills District / Concept Plan Map 1, which is intended to serve as a focal point for the surrounding communities and allows for a broad range and mix of uses including commercial, institutional, cultural, recreational, entertainment, community services, and public uses.

Development Plans

Canadian Tire continually assesses the potential for store expansions. On October 12, 2022, a Zoning By-law Amendment was approved (File No. Z-23-09) to facilitate the expansion and a pre-application request for Site Plan Approval (City File no. PC-23-14) resulted in a Site Plan Review Committee Report dated January 12, 2024. At this time, an application for Site Plan Approval has not been submitted.

CITY OF WATERLOO OFFICIAL PLAN REVIEW

Based on our review of the June 2024 Draft Official Plan schedules, we note the following and have comments as noted:

- On Schedule A, Land Use Plan, the Canadian Tire Lands are shown as “Commercial and Mixed-Use”;
- On Schedule A1, Commercial and Mixed-Use Land Uses, the Canadian Tire Lands are shown as “Mixed-Use Community” (and would therefore no longer be designated Mixed Use Neighbourhood Commercial Designation);
- Based on Schedule A6, Area Specific Policies, the Canadian Tire Lands are identified as “Area Specific Policy 8 (West Side Nodes)”;
- On Schedule B, City Structure, the Canadian Tire Lands are shown as “Minor Node”; and
- On Schedule B1, Built Form, the Canadian Tire Lands are shown as “Medium High Rise, 12 storeys”. We request clarification as to what is intended by the grey lines shown within the Canadian Tire Lands as they do not appear to be parcel lines or reflect existing internal drive aisles.

Our preliminary comments for the June 2024 Draft Official Plan are as follows:

- New Policy 3.4(3) and related new Policy 3.4(4) require minimum residential density where residential uses are identified as a “permitted” use. The policies do not account for sites where residential uses may be permitted, but may not be proposed at that time. For example, the Canadian Tire Lands do include residential permissions but are developed as an existing commercial site, and are intended to remain as such. Therefore, in our submission it is not appropriate to effectively require residential uses be introduced, prior to comprehensive redevelopment. **In our submission, the policies should be revised to specify “Where the Official Plan permits residential uses within a land use designation and when residential uses are proposed...”**
- Amended Policy 3.6.4 states “Construction of new low rise uses will be discouraged within designated Nodes, Major and Minor Corridors, and Major

Transit Station Areas. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter". **In our submission, additions to existing low rise buildings and other interim development should not be discouraged and accordingly "Where appropriate," should be added before "construction of new ..." to provide adequate flexibility;**

- New Policy 3.10.1(1)(d) states "Buildings shall be designed with prominent building entrances which face the street. Access from sidewalks, other pedestrian facilities and public open spaces to primary building entrances shall be clearly visible, convenient and direct, with minimum changes in grade, and shall be accessible and barrier-free. **In our submission, the use of "shall" should be replaced with "should" in order to provide flexibility to account for site context and operational aspects;**
- New Policy 3.10.1(3)(e) states "Street walls shall be designed to be proportional to the width of the public right-of-way in order to support a sense of enclosure and contribute to a human-scale streetscape." **In our submission, "shall" should be changed to "should" in order to provide for flexibility to account for site context and operational aspects as well as building type (i.e., commercial buildings that are less than the proportional to the width of the public right-of-way);**
- New Policy 3.10.1(1)(f) states "Larger buildings shall break up the visual impact of their mass through stepbacks to upper levels, vertical and horizontal recesses and projections, façade articulation, architectural detailing and changes in plane, materiality, texture and colour." **We request clarification as to what is intended with this policy. "Larger buildings" is undefined terminology, and does not provide clarity as to the site contexts to which this policy would apply. Furthermore, it is unclear whether all of these design elements are required to be incorporated into the development of a larger building. We suggest that "larger buildings" be clarified, and consider adding "means such as" after "their mass through..." to provide appropriate flexibility that not all elements are required in order to break up the visual impact, and that the list is not exhaustive;**
- New Policy 3.10.1(1)(q) states "In terms of priorities, to place greater emphasis on urban design compared to density." **We seek clarification as to the intent of this policy, which appears to be contradictory to new draft Policy 3.4(7), which encourages a balancing of multiple City building objectives in order to achieve optimal development. In our submission, other city building elements should also be prioritized and we suggest Policy 3.10.1(1)(q) be removed;**
- New Policy 3.10.1(5)(a) states "Development shall demonstrate best practices in green building technologies, use of renewable and alternative energy sources, and employ other sustainable design measures to contribute to the achievement of the Region of Waterloo's greenhouse gas emissions target of 80% below 2010 levels by 2050". **In our submission, "shall" should be changed to "should" in order to provide for flexibility where renewable energy and alternative energy sources are not sufficiently available or will not meet operational requirements;**

- New Policy 3.10.5(1) states “Large sites shall be planned to create complete communities unto themselves. Important principles of complete communities include: (a) They are mixed use. They include places to live, work, learn, play and move. Large sites should include many of these land uses, and for the largest sites, all of these land uses will be found together in meaningful amounts. (c) They are compact. Residential, commercial and employment densities are relatively high, access to public open spaces is ubiquitous, and community uses are integrated. (d) They are amenity-rich. Streetscapes are safe, comfortable and attractive; there is a range of public open space types, sizes and functions; there is a choice of retail and service commercial uses; and there are community uses/services available.” **We request clarification as to what is intended by “large sites”, as the terminology is undefined and highly contextual. In our submission, providing for a mix of residential, commercial, employment and public open space uses on the largest sites may not be appropriate in all contexts, particularly balancing matters of land use compatibility. Additionally, flexibility should be built into the policies with “where appropriate” language;**
- New Policy 3.10.5(4) states “The phasing strategy for large sites shall ensure the site functions continuously and seamlessly as portions of it are implemented over time. The phasing strategy ensures that the public realm and community amenities are implemented proportionately and appropriately within the development, and that retail, employment, services and other uses are provided (or replaced) incrementally with residential uses to ensure they are mutually supportive and disruption to the community is avoided. This includes comprehensive construction management plans to minimize impacts to existing buildings/uses and public lands.” **We seek clarification regarding the definition of “large sites”. Furthermore, this policy does not accommodate small-scale or interim development of existing commercial sites prior to comprehensive redevelopment. In our submission, we suggest adding “Where a phasing strategy is required,” at the beginning of the policy to allow for flexibility in determining when a phasing strategy is to be required;**
- New Policy 10.2.1(6) states “Development of Commercial and Mixed-Use designated areas will primarily consist of mixed-use buildings. For larger sites, and development that includes multiple buildings on the same site, the City may consider the development of mixed-use sites, where some buildings may be a stand-alone single use. Where mixed-use sites are contemplated, development focus will remain on creating active and pedestrian focused streetscapes. (a) Notwithstanding policy 10.2.1 (6), some designations and/or specific policies of this Plan may require mixed-use buildings only or limit the scale and scope of single use buildings to ensure desired commercial functions are achieved.” **We request clarification as to what is intended by “larger sites” and in our submission, “development” should be changed to “redevelopment” to reflect that prior to any redevelopment, existing single-alone single uses use will continue to be permitted;**
- New Policy 10.2.2.3(4) states “Mixed-Use Community designated areas located in Minor Node or Minor Corridors shall generally be zoned to permit a range of small to mid-size commercial and mixed uses.” **In our submission, the Canadian Tire Lands should continue to permit larger-sized commercial uses (i.e., the**

Canadian Tire store) and accordingly, we suggest that the policy framework be considered further (we note the applicability of Policy 11.1.8 Area Specific Policy 8);

- New Policy 10.2.2.3(6) states “Lands designated Mixed-Use Community Commercial may be zoned to permit a range of complementary uses, provided they do not restrict the development of primary uses and are not obnoxious by reason of noise, vibration, odour or smoke. Complementary uses shall be located within mixed-use buildings unless demonstrated to the satisfaction of the City that being part of a mixed-use building would not be feasible or desirable. Complementary uses may include: (a) Accommodation services; (b) Community uses; (c) Child care centres; (d) Entertainment facilities uses; (e) Commercial recreation; (f) Commercial school; (g) Arts, cultural, recreational uses; (h) Urban agriculture; (i) Automobile gas and/or service station, and/or vehicle charging station; and (j) Structured parking facilities and/or secured bicycle storage facilities.” **In our submission, uses such as “automobile gas and/or service station, and/or vehicle charging station” should not be required to “be located within mixed-use buildings” and permitted without the caveat that it be demonstrated to the satisfaction of the City that being part of a mixed-use building would not be feasible or desirable;**
- New Policy 10.2.2.3(5)(d) related to permitting “primarily” residential uses, which based on the numbering should be (7)(d), states “Where pre-existing commercial uses are located or zoned on a site proposed for new freestanding residential uses, the equivalent or greater amount of commercial floor space shall be accommodated as part of the new proposed development”. Related Policy 10.2.2.3(8)(d) states “Any development of a designated Mixed-Use Community areas identified in policy 10.2.2.3 shall result in no net loss of gross leasable floor space, and maintain the planned commercial function of the site. Where the intensity of the site is planned to be increased through new development, additional commercial space and uses are encouraged, proportional to the scale of the proposed new development.” Related Policy 10.2.3(2) states “Where and [sic] amendment is required to permit the development of a large commercial and mixed-use site greater than five hectares, the City may require the submission of an independent and comprehensive professional analysis to assess the appropriateness, opportunities and implications of the proposal, and to assess compliance with the policies and objectives of this Plan. Maintaining the commercial function will be the primary objective of any redevelopment for the City.” Lastly, as noted above, Policy 3.10.5(1) states that “retail, employment, services and other uses are provided (or *replaced* [emphasis added]) incrementally with residential uses”. **In our submission it is not always appropriate or feasible under all circumstances to redevelop with “no net loss of gross leasable floor space” or to accommodate “the equivalent or greater amount of commercial floor space” for new development. In most cases, exact replacement of commercial space in new development is not achievable when considering the scale of the existing non-residential uses as large format shopping destinations. The form of development and the delivery of non-residential space within a mixed-use redevelopment context, in our experience, differs from the existing large format store, often in smaller storefronts and in buildings with smaller footprints. In our submission, we**

- suggest the City reconsider the expectation of 1:1 replacement, and further suggest that these related policies should be consolidated to ensure clarity of intent and avoid duplication;
- We note that former Policy 10.2.2.6 Mixed-Use Neighbourhood Commercial Designation, which is currently applicable to the Canadian Tire Lands, is proposed to be entirely deleted and consolidated with the Mixed-Use Community policies;
 - New Policy 10.2.4(g) states "The Zoning by-law shall require ground floor building heights to be a minimum of 4.5 metres to allow for convertible frontage and active uses at ground level." In our submission, **"Where appropriate," should be added before "the zoning by-law shall"** in order to recognize existing commercial uses and provide flexibility based on site context;
 - New Policy 11.1.8 Area Specific Policy 8 (West Side Nodes) generally pulls through the existing policies, however there remain references to the "Mixed-Use Neighbourhood Commercial" policies under Policy 11.1.8(4)(b), when as noted above, the designation and policies were deleted, including the reference in Policy 11.1.8(4)(b)(i) to Policy 10.2.2.6(6), which was deleted and the reference in Policy 11.1.8(4)(b)(ii) to Policy 10.2.2.6(3)(a), which was deleted. Accordingly, we request clarification as to the intention for Area Specific Policy 8 that is applicable to the Canadian Tire Lands;
 - New Policy 12.2.3(1) states "At the City's discretion, large development sites may be subject to a Master Plan process, the purpose of which will be to provide overall direction and comprehensive planning for the development of the subject lands." **We request clarification as to what is intended by "large development sites";** and
 - New Policy 12.2.15(9) states "The City may require applicants who amend complete applications to participate in an additional pre-application consultation meeting or meetings...". **The Planning Act, as amended by Bill 185, does not allow pre-consultation meeting(s) to be "required" by the municipality, and we suggest that the policy be revised accordingly.**

We would welcome the opportunity to meet with Staff to discuss our comments further.

In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Canadian Tire Real Estate Limited (via email)



Zelinka Priamo Ltd.

LAND USE PLANNERS

VIA EMAIL

December 2, 2024

Mayor and Members of Council
City of Waterloo
100 Regina Street South
Waterloo, ON
N2J 4A8

Attention: Julie Finley-Swaren, City Clerk

**Re: Formal Public Meeting, OPA No.58 (November 2024 Draft Official Plan)
City of Waterloo Official Plan Review (Phase 1)
Preliminary Comments on Behalf of Canadian Tire Properties Inc. and
Canadian Tire Real Estate Limited
650-660 Erb Street West
Waterloo, ON
Our File: CAT/WAT/23-01**

We are the planning consultants for Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited ("Canadian Tire"), which are the registered owner and tenant of lands known municipally as 650-660 Erb Street West, Waterloo (the "Canadian Tire Lands"). The Canadian Tire Lands of approximately 3.4 ha (8.4 ac) are currently developed with an existing Canadian Tire store and associated garden centre, along with an A&W restaurant and a Canadian Tire Gas Bar and Car Wash.

On behalf of Canadian Tire, we have been monitoring the City's Official Plan Review (Phase 1). For the Draft Official Plan dated June 2024, we submitted preliminary comments dated August 28, 2024 and met with Planning Staff on October 15, 2024. It is our understanding that Draft OPA 58 dated November 2024 with associated Draft schedules was released for review for the Formal Public Meeting scheduled for December 2, 2024. It is also our understanding from Staff Report IPPW2024-061, dated December 2, 2024, that Staff are recommending approval of OPA 58 and that Council direct Staff to initiate a ZBA application to implement OPA 58. Staff Report IPPW2024-061 provides Staff responses to our comments dated August 28, 2024. Based upon our review of Draft OPA 58 dated November 2024 and the Staff responses, on behalf of Canadian Tire we have preliminary comments as outlined below and will continue to review Draft OPA 58 dated November 2024 in more detail and may provide further comments, as required.

BACKGROUND

Current Official Plan

The Canadian Tire Lands are currently designated Commercial and Mixed-Use Neighbourhood Commercial according to Schedules A and A1 of the City of Waterloo Official Plan, respectively. The subject lands are shown within a Minor Node on City Structure Schedule B. The subject lands are within the Clair Hills District (Schedule C), are Designated Greenfield Areas (Schedule B3) and are located in WPSA-8 according to Schedule B4. Specific Provision Area 8 – West Side Nodes is applicable to the subject lands for the Minor Node at the intersection of Erb Street and Erbsville/Ira Needles Boulevard. Under the Clair Hills District Implementation Plan, the Canadian Tire Lands are shown as Mixed-Use Activity Node on the Clair Hills District / Concept Plan Map 1, which is intended to serve as a focal point for the surrounding communities and allows for a broad range and mix of uses including commercial, institutional, cultural, recreational, entertainment, community services, and public uses.

Development Plans

Canadian Tire continually assesses the potential for store expansions. On October 12, 2022, a Zoning By-law Amendment was approved (File No. Z-23-09) to facilitate the expansion and a pre-application request for Site Plan Approval (City File no. PC-23-14) resulted in a Site Plan Review Committee Report dated January 12, 2024. At this time, an application for Site Plan Approval has not been submitted.

CITY OF WATERLOO DRAFT OPA 58 DATED NOVEMBER 2024

Based on our review of the schedules from Draft OPA 58 dated November 2024, we note the following and have comments as noted:

- On Schedule A, Land Use Plan, the Canadian Tire Lands are shown as “Commercial and Mixed-Use”;
- On Schedule A1, Commercial and Mixed-Use Land Uses, the Canadian Tire Lands are shown as “Mixed-Use Community” (and would therefore no longer be designated Mixed Use Neighbourhood Commercial Designation);
- On Schedule B, City Structure, the Canadian Tire Lands are shown as “Minor Node”;
- On Schedule B1, Built Form, the Canadian Tire Lands are shown as “Medium High Rise, 12 storeys”; and
- Based on the Official Plan Area Specific Policies Appendix, the Canadian Tire Lands are identified as “Area Specific Policy 8”.

Our preliminary comments for Draft OPA 58 dated November 2024 are as follows:

- Amended Policy 3.5.4(3) states “Construction of new low rise uses will be discouraged within designated Nodes, Major and Minor Corridors and Major Transit Station Areas. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter”. **The Staff Report IPPW2024-061 Staff response to our August 28, 2024 comment states “Existing low-rise sites may continue. Policies discourage low rise redevelopment but do not prohibit them.” We reiterate that in our submission, additions to existing low rise buildings and other**

- interim development should not be discouraged and accordingly “Where appropriate,” should be added before “construction of new ...” to provide clarity as to the policy intent; and
- New Policy 10.2.2.3(4) states “Mixed-Use Community designated areas located in Minor Node or Minor Corridors shall generally be zoned to permit a range of small to mid-size commercial and mixed uses.” **The Staff Report IPPW2024-061 Staff response to our August 28, 2024 comment states “Permissions for large scale commercial uses are still in place within the Mixed Use Community Designation”. In our submission, “and large-scale” prior to “commercial uses” would provide clarity that large scale retail stores (i.e., the Canadian Tire store) are permitted.**

We would welcome the opportunity to meet with Staff to discuss our comments further.

In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of the adoption of the Official Plan.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Canadian Tire Real Estate Limited (via email)
Ric Martins, Senior Policy Planner, City of Waterloo (via email)



STAFF REPORT
Planning

Title: Official Plan Amendment 58: Official Plan Review (Phase 1)
Report Number: IPPW2024-061
Author: Ric Martins
Council Date: December 2, 2024
File: PF2020-002
Attachments: Appendix "A" - Official Plan Amendment No.58
Appendix "B" - Summary of submissions and staff responses
Appendix "C" - Summarized agency comments and staff responses
Appendix "D" - Minutes of Informal Public Meeting

Ward No.: City-Wide

Recommendations:

1. That Council approve report IPPW2024-061.
2. That Council adopt Official Plan Amendment No 58 (OPA 58) – Official Plan Review (Phase 1), as set out in Appendix 'A' to IPPW2024-061.
3. That Council request that the Regional Municipality of Waterloo approve Official Plan Amendment No. 58 (OPA 58).
4. That Council direct staff to initiate a zoning by-law amendment application to implement Official Plan Amendment No 58.

A. Executive Summary

The City of Waterloo is undertaking a statutory review of its Official Plan, as required by the Planning Act (Ontario). The Official Plan Review ("OPR") is a multi-phase process intended to refine existing Official Plan policies and mapping to reflect contemporary best practices in urban planning, and to update the City Official Plan ("City OP") for consistency with legislation and current Provincial and Regional policies and plans. Proposed updates to the City OP seek to address local considerations / context, and input received to date from community consultation, where appropriate.

A phased approach to the Official Plan Review allows for key chapters in the City OP to be updated in the short term, in response to current planning pressures and strategic priorities. Further, in 2023, the City was awarded funding from the Federal Government's Housing Accelerator Fund (HAF). Some HAF initiatives are directly or indirectly tied to the updated City OP and necessitate a phased approach to the OPR.

Phase 1 of the OPR will enable several of HAF initiatives to advance, as the City works towards meeting its HAF objectives and targets. In response to legislative changes and the transition of upper-tier (regional) planning authority to local area municipalities forthcoming in 2025, the phased approach to the OPR also creates the necessary flexibility to address Provincial requirements.

In June 2024, the City released a draft of the updated City OP, which included draft updated policies and land use mapping. Following release of the update, City staff consulted with the community and received several comments and submissions on the draft policies and plans. In October 2024, the Province replaced the Provincial Policy Statement (2020) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, with a consolidated document called the Provincial Planning Statement (“PPS2024”). City OP policies addressed in Phase 1 have been updated to be consistent with Provincial plans and policies, as is legally required.

Based on community consultation and further review and refinement of the draft policies and plans, a recommended Phase 1 update to the City OP is available for City Council’s consideration, as set out in Appendix “A” to this report. Appendix “B” summarized the comments received on Phase 1 and staff abbreviated responses. Overall, the recommended Official Plan updates include minor amendments to Chapters 1-2 (Introduction and Principles/Basis), more extensive amendments to Chapter 3 (City Form) and Chapter 10 (Land Use Designations), and administrative amendments to Chapter 11 (Site Specific Provision; now named Area Specific Policies) and Chapter 12 (Implementation and the Glossary). Several housekeeping updates are also included in the recommended amendments, as well as amendments to several Schedules (maps) in accordance with the policy updates.

B. Financial Implications

Through report IPPW2017-041, \$156,000 was made available for the Official Plan Review. An additional \$159,000 was subsequently made available in routine funding (Ref 652 in the approved 2020-2022 Capital Budget).

As noted in the OPR Terms of Reference report (IPPW2020-060), a total of \$125,938 was allocated to the Commercial and Employment Policy Study. In addition, a total of \$10,327 has been incurred to date for administrative cost.

A total of \$178,735 remains available in capital funding.

If Official Plan Amendment No. 58 is appealed, potential costs related to an Ontario Land Tribunal hearing may be incurred, to be funded from the Planning Litigation Reserve (LIT).

C. Technology Implications

None

D. Link to Strategic Plan

(Strategic Priorities: Reconciliation, Equity, Accessibility, Diversity and Inclusion; Environmental Sustainability and Climate Action; Complete Community; Infrastructure and Transportation Systems; Innovation and Future-Ready)

(Guiding Principles: Equity and Inclusion; Sustainability; Integrity; Workplace Wellbeing; Community-centred; Operational Excellence)

The Official Plan is the City's primary comprehensive land use planning document that guides growth, land use change, built form, and development. Updating the City OP will ensure that it aligns with the 2023-2026 Strategic Plan, including the Strategic Priority of creating a complete community and making the city future ready.

E. Previous Reports on this Topic

IPPW2024-005 – Official Plan Review: Draft Official Plan Policies and Schedules
IPPW2022-055 – Official Plan Review: Commercial and Employment Policy Study
IPPW2021-040 – Official Plan Review: Key Facts and Trends 2021
IPPW2020-060 – Official Plan Review: Terms of Reference



Official Plan Amendment 58: Official Plan Review (Phase 1) IPPW2024-061

1.0 Overview and Context

The Official Plan provides city-wide direction on growth management, land use planning, and development related matters over a timeframe of 20+ years. The City of Waterloo Official Plan (“City OP”) provides direction through a wide range of policies and plans to achieve the City’s intended vision for growth and community vibrancy. Policies in the City OP are updated and reviewed periodically to address the changing needs and priorities of the community. The existing City OP was first adopted in 2012 and amended from time to time as appropriate and necessary. As prescribed by the Planning Act, the City must undertake a review and update of the City OP policies and mapping.

Official Plan Amendment No. 58 (“OPA 58”, being Phase 1 of the OPR) is intended to refine existing City OP policies and mapping to reflect contemporary best practices in urban planning in the local context and address current community needs and priorities. OPA 58 also updates the City OP for consistency with Provincial and Regional policies and plans, and conformity to applicable Provincial legislation.

Since the launch of the review, the Province has made a series of significant legislative updates that impact municipal Official Plans. The recommended OPA 58 aligns with several recent legislative changes, including the *More Homes Built Faster Act, 2022* (Bill 23), the *More Homes for Everyone Act, 2022* (Bill 109), and the *Cutting Red Tape to Build More Homes Act, 2024* (Bill 185).

On October 20, 2024, a new Provincial Planning Statement (“PPS 2024”) took effect for all municipalities in the Province. PPS 2024 replaces both the former Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe. OPA 58 removes references to these former policy documents and updates the City OP for consistency with the PPS 2024.

A preliminary set of municipal priorities was established early in the OPR process, which helped guide the initial draft of the updated policies and plans. Key themes emerged as part of the review including refining policies to streamline the development process and improve clarity, strengthen policies to build a complete community, and identify opportunities to increase the amount and types of housing available to current and future residents of the city.

The OPR follows the recently updated and approved Regional Official Plan (ROP) Amendment No. 6, which the local municipality are required to conform to pursuant to the Planning Act. OPA 58 integrates applicable ROP priorities into the City OP including: focusing development within current municipal boundaries; encouraging more housing and housing of all types; building complete communities; creating and maintaining opportunities for employment; facilitating the development of Major Transit Station Area (“MTSA”) communities; and encouraging well planned and well-designed developments. ROP Amendment No. 6 was adopted by the Region in August 2022 and approved by the Province in April 2024. As such, portions of the ROP are not yet consistent with the new PPS2024. While the City OP is generally consistent with the ROP, where there are discrepancies between the ROP and the PPS2024, OPA 58 ensured policies are consistent with the PPS2024.

2.0 Official Plan Review Process

The City OP is a comprehensive document that addresses a wide range of growth, land use and development related topics and policies. A phased approach to the OPR process has been established to enable the City to complete more pressing updates in a timely manner, while creating flexibility to address additional items in later phases as needed. The phased approach also provides an opportunity to respond to on-going legislative changes and the transition of upper-tier (regional) planning authority to local area municipalities that will take place next year. This transition will result in the Region becoming an upper-tier municipality without planning responsibility, meaning they will no longer be the approval authority for local Official Plan Amendments after January 1, 2025. The administration of the Regional Official Plan will also become the responsibility of local area municipalities.

The scope of the OPR, established in the initial Terms of Reference was to revise the City OP while maintaining the overall structure and planning framework that was established in 2012. As such, some sections have been reviewed and updated more than others, to update policies for consistency with Provincial and Regional directions, and to address local issues and strategic priorities.

Components addresses in Phase 1 of the OPR include minor updates and refinements to Chapters 1-2 (“Introduction” and “Vision, Principles and Basis”), more detailed amendments to Chapter 3 (“Urban Form”) and Chapter 10 (“Land Use Designations”), and streamlining / housekeeping revisions throughout the Plan but concentrated in Chapter 11 (Specific Provision Areas; now “Area Specific Policies”) and Chapter 12 (“Implementation” and the “Glossary”). Several Official Plan Schedules (maps) are updated to correspond to recommended policy amendments. A comprehensive summary of key modifications is detailed in Section 3.0 of this report, with detailed amendments set out in Appendix “A”.

Future phases of the OPA will include updates to Chapter 4 (“Arts, Culture, Heritage, and Leisure”), Chapter 5 (“Networks”), Chapter 6 (“Transportation”), further refinements to Area Specific Policies, and more detailed evaluations of site-specific requests received in

the Fall 2024 which staff were not able to comprehensively review in Phase 1. Future phases will also address Chapter 8 (“Environment and Energy”), and other remaining chapters.

2.1 Focus Areas and Priorities

Early in the OPR process, following the approval of the Terms of Reference, the City’s OPR team identified eight (8) high-level areas of focus, as follows:

- Vision and Strategic Plan
- City Growth, Structure and Form
- Economic Development and Innovation
- Environment and Climate Change
- Affordable Housing and Equity
- Neighbourhoods, Communities and Culture
- Planning Process and Public Consultation
- Transportation and Mobility

Staff summarized each of these areas of focus, creating “Issues Briefs”, which provided an overview of the issues and current conditions affecting the city, identified strategic directions, and outlined potential policy considerations. These Issues Briefs, along with the “Key Facts and Trends Report” (IPPW2021-040, June 2021) established a baseline and ‘springboard’ for early consultation with various interest groups, Committees of Council, and the broader public.

Through community consultation, three priorities emerged for Phase 1 of the OPR that were highlighted in June 2024 with the release of the draft OPR policies as part of report IPPW2024-005:

- Facilitating Housing and Refining Urban Form
- Encouraging Compact and Complete Communities
- Streamlining and Clarifying Policies

Associated action items were identified for each priority area and subsequently incorporated into the recommended amendments forming OPA 58.

2.2 Background Studies and Technical Information

While the majority of the OPR evaluation was completed internally by City staff, several reports and background studies were completed by external consultants, which contributed to the recommended amendments forming OPA 58. The external evaluations concentrated on specialized areas, including commercial and employment market analysis, and urban design. Some studies were specific to the OPR (such as the Commercial and Employment Policy Study), while others were general planning background studies that originated from other initiatives but provide valuable information

that helped inform and direct policies in OPA 58. Some of the background studies are listed below:

Housing Needs and Demand Analysis (2020) – identified the city's current and future housing needs, particularly as it relates to affordable housing.

Key Facts and Trends Report (2021) – identified and described key social, economic demographic and physical changes and trends that are occurring in Waterloo and are likely to impact the community in the future.

Commercial and Employment Policy Study (2022) – a commercial and employment market analysis and policy best practices assessment used to inform updates to the commercial and employment policy framework.

Minor Corridor Expansion (Technical Assessment) (2022) – an internal technical review of the City's corridors to determine if the depth of corridors is sufficient to facilitate mid-rise development.

Built Form Review Study (2023) – assessed mid and high-rise development in Waterloo to identify areas to streamline the development process.

Urban Design Review and Height & Density Review (2024) – as a follow-up to the more general Built Form Review Study, two addendum technical reports were completed to review the existing height and density framework policies in the Official Plan as well as to review and provide recommended updated urban design policies.

Affordable Housing Strategy 2023-2033 (2023) – identified general principles and goals related to affordable housing and identified specific actions that could be undertaken over the next 10 years in response to the City's current and anticipated housing challenges.

2.3 Housing Accelerator Fund

In late 2023, the City was awarded \$22 million in Federal Government funding as part of the Housing Accelerator Fund (HAF). Through the fund, several initiatives were identified to increase the supply of housing and to create greater certainty in the development approvals and building permit process. Some HAF initiatives are directly tied to the Official Plan Review, while others are being undertaken in parallel to the OPR and/or may be enabled by updated policies in the City OP. In general, the HAF initiatives are aligned with the overall goals and intent of the policy direction of the OPR. There are eight (8) HAF initiatives, with five initiatives being directly tied to or related to the OPR:

Employment Land Conversion – as a continuation of the Region's employment area municipal comprehensive review, OPA 58 identifies a new land use designation for employment areas within Major Transit Station Areas that enables mixed use, including new residential uses in close proximity to Light Rail Transit stops.

Community Planning Permit System – a new land use planning tool to streamline the application and approval process. OPA 58 includes updated policies to enable this initiative.

Parking Framework / Approval Process Update – this initiative is intended to create a streamline process to reduce parking amendments for developments that include affordable housing units. OPA 58 includes updated policies to enable this initiative.

Additional Residential Unit Toolkit - as part of HAF Initiative 6, the City is exploring the potential to permit four units and four storeys on properties designated for low-rise residential built forms. OPA 58 establishes policies to enable the potential for the height increase, subject to implementing zoning. The updated / new policies will allow for additional residential units, more specifically up to four (4) additional residential units subject to implementing zoning.

Corridor Expansion Study and Plan – a study is being undertaken to enable “missing middle” and transit supportive housing options in the Sugarbush South neighbourhood. OPA 58 establishes a Minor Corridor along the north face of Columbia Street West between Albert Street and King Street, in alignment with this initiative.

2.4 Consultation

City staff engaged and consulted with the community, development industry and agencies throughout the Phase 1 OPR process. Early consultation focused on the Issues Briefs and priority matters for the OPR. Staff reached out through the Engage Waterloo website, participated in virtual and in-person neighbourhood and community meetings/workshops, and as part of the Commercial and Employment Policy Study reached out through surveys and stakeholder interviews. Planning staff also held several direct meetings with Committees of Council, community institutions (universities, schoolboards etc.), and various interest groups.

Following the release of the draft Official Plan in June 2024, Planning staff further engaged with Committees of Council, the Uptown BIA, circulated the draft amendments to public agencies, and hosted two development industry workshops. As part of the review process, staff consulted with both the Six Nations of the Grand River and the Mississaugas of the Credit First Nation. Additional community engagement included several Waterloo Public Library “pop-up sessions” at all municipal library locations, attending one of the summer “Night Market” events at the Waterloo Main Branch Library, hosting two Public Open House sessions in September, as well as a Public Meeting held at Council in late September 2024. Throughout the consultation period, staff engaged with several interested persons and parties who provided formal submissions on the draft amendments to the City OP. These formal submissions are noted in Appendix “B” and further detailed in Section 3.2 of this report. A summary of agency comments is noted in Appendix “C”.

3.0 Summary of Recommended Official Plan Amendments / Updates

The focus of the OPR is to incorporate policy and mapping refinements into the existing City OP to address Provincial, Regional and local planning directions and objectives, as well as to clarify and streamline City OP policies.

The full outline of the recommended amendments to the Official Plan (Phase 1 OPR) is detailed in Appendix "A". Given the breadth of the City OP, an abbreviated listing of the recommended amendments is noted below, along with a summary of what has been further updated and refined since the June 2024 draft of OPA 58:

Chapter 1 – Introduction and Chapter 2 – Vision, Principles and Basis of the Plan

- Added Territorial Acknowledgement
- Minor administrative modifications
- Updated 2.2 Principles of the Plan to reflect a sustainability framework
- Added references to the City Strategic Plan

Modifications from the June 2024 draft of OPA 58:

- Revised wording and location of Territorial Acknowledgement
- Additional administrative modifications and updated terminology (for consistency and clarity)

Chapter 3 – City Form

- Several administrative modifications, including:
 - Updated preamble, removing redundancies
 - Reinforced concept of complete communities
 - Streamlined 3.1 Objectives
 - Modified designation name changes from "high density" to "high rise", and removal of "mixed-use" from residential land use designations.
- Consolidated all Official Plan targets into a table including population, growth, density and housing targets
- Height measured in metres has been replaced with heights measured in storeys (creates flexibility in the City OP, and leaves technical measurements to zoning)
- Permitting up to 30 storeys as of right in Major Transit Station Areas and Uptown, with up to 25 storeys contemplated in the remaining high rise areas
- Removal of maximum densities from the City OP (policies focused to built form, and leaves density considerations to zoning)
- Merged Nodes, Corridors, and MTSA's under one section called "City Structure"
- Updated Major Transit Station Area policies, which are now consolidated within the Chapter under the "City Structure" heading
- Moved and streamlined "Greenfield Areas" to the new "City Structure" section
- Minor Corridor expansions in select areas by: (a) expanding the depth of existing corridors to achieve more viable redevelopment sites; or (b) identifying new Minor Corridor areas

- Creation of a "Minor Neighbourhood Corridor" designation, which will enable a broader range of gentle density in select low rise areas (e.g., stacked townhouses, 4-storey apartments, etc.)
- Renaming references: from "Uptown Waterloo Urban Growth Centre" to "Uptown Waterloo Primary Node", to align with the draft Provincial Planning Statement
- Updated Urban Design policies

Modifications from the June 2024 draft of OPA 58:

- Additional wording refinements and clarifications based on review and comments received
- Updated policies for consistency with the PPS2024 including "designated growth area policies"
- Added environmentally sustainable and resilient communities, climate action and equity concepts to Objectives
- Removed references to "15-minute communities" and combined with "complete communities" as the standard term used throughout the Plan
- Further refinements and updates to the Urban Design section
- Moved and updated policies related to considerations for increasing height and redesignations from Chapter 10 (applies to all proposals for increased height, in any land use designation)

Chapters 4 – Arts, Culture, Heritage, and Leisure and Chapter 5 – Networks

- not updated as part of Phase 1 OPR

Chapter 6 – Transportation

- No updates in the June 2024 draft OP, as the majority of the Chapter will be updated in the next phase of the OPR

Modifications from the June 2024 draft of OPA 58:

- A subsection of the chapter is included in OPR Phase 1, to facilitate HAF Initiative 8 – re: update to Section 6.6.2 (Cash-in-lieu of Parking) to facilitate the development of affordable housing

Chapter 7 – Economy

- Relevant policies have been moved to other sections of the Official Plan such as "Employment" and "Major Institutional" where applicable
- Remaining components of the chapter were deleted. Portions of Chapter 7 were not directly land use related, and there are other more appropriate and effective instruments to implement the City's Economic Development objectives, such as the Economic Development Strategy.

Chapter 8 – Environment and Energy and Chapter 9 – Mineral Aggregates

- not updated as part of Phase 1 OPR

Chapter 10 – Land Use Designations

Residential designations

- Updated residential designation names, including:
 - “Low Density Residential” to “Low Rise Residential”
 - “Mixed-Use-Medium Density” to “Medium Rise Residential”
 - “Mixed-Use Medium High Density” to “Medium High Rise Residential”
 - “Mixed-Use-High Density” to “Mixed-Use-High Rise Residential”
- Streamlined Additional Residential Unit (ARU) policies to align with the Planning Act; removed detailed/restrictive language. Enables three (3) ARUs as of right, subject to zoning.
- Updated post secondary residential policies to encourage residential development for students and faculty on or near the main campus
- Removed limitations on house conversions, in accordance with Provincial requirements for ARUs
- Updated Affordable Housing policies to conform with ROPA 6 and the City’s Affordable Housing Strategy
- Low Rise Residential: Minor updates to stacked townhouses (formerly known as terrace dwellings) and low-rise apartment criteria to allow for more flexibility, subject to zoning
- Medium Rise Residential: removal of ancillary use restrictions/caps, deferring such details to zoning
- High Rise Residential: removal of ancillary use restrictions/caps, deferring such details to zoning

Modifications from the June 2024 draft of OPA 58:

- Policies related to increase in height/ “up-designation” moved to Chapter 3
- Updates to allow small-scale commercial uses in areas designated for low rise residential
- Additional wording refinements and clarifications based on review and comments received
- Modified references to “character”
- Increase building height in areas designated for low rise residential (up to four storeys, subject to zoning)

Commercial and Mixed Use designations

- Focus is on “Commercial and Mixed-Use” land policies - consolidation of some designations as per recommendations from Commercial and Employment Policy Study
- Primary Commercial and Retail Centres are comprised of:
 - (i) Uptown Mixed-Use Core,
 - (ii) Conestoga Commercial Centre, and
 - (iii) West Side Mixed-Use Commercial Centre.
- Consolidated the “Uptown Commercial Core” and “Uptown Complementary Transition Area” designations into a single designation titled “Uptown Mixed-Use Core”

- Consolidated the “Mixed-Use Community Commercial”, “Mixed-Use Neighbourhood Commercial”, and some “Mixed-Use Office” designations into a single “Mixed-Use Community” designation
- “Mixed-Use Office” designation has been removed. Properties currently designated Mixed-Use Office are proposed to be re-designated to an alternate Commercial designation, including Academic (e.g. some Laurier owned properties on Lodge Street), or Business Employment, as appropriate
- Neighbourhood and Speciality-Serving Centres and Areas is comprised of:
 - Convenience Commercial; and,
 - Corridor Commercial

Modifications from the June 2024 draft of OPA 58:

- Further refinements and removal of commercial minimums and maximums
- Additional wording refinements and clarifications based on review and comments received

Employment Designations

- Employment areas – Business Employment and Flexible Industrial policies updated to reflect PPS 2024 and ROPA 6; general streamlining of policies
- Redesignated some Business Employment lands to Flexible Industrial
- Removed office uses as primary uses within the “Flexible Industrial” designation
- Updated employment conversion criteria in accordance with the PPS2024
- Academic uses removed from employment designation

Modifications from the June 2024 draft of OPA 58:

- Definition of “employment area” has been modified by the Planning Act and PPS2024, resulting in updated employment framework (e.g., lands designated “Flexible Industrial” are considered employment areas as per the new definition)
- Additional areas (along Northfield Dr. E, east of Bridge St. W) have been redesignated from Business Employment to Flexible Industrial
- Business Employment designation updated to allow a wider range of uses but still intended for employment purposes
- Additional wording refinements and clarifications based on review and comments received

Major Institutional (Academic)

- Removed Academic from the “Employment” designation and moved it to the “Major Institutional” designation (new “Major Institutional - Academic” sub-designation for post-secondary uses)

Modifications from the June 2024 draft of OPA 58:

- Additional wording refinements and clarifications based on review and comments received
- Several Wilfrid Laurier University owned lands designed Academic
- Updated wording for the Academic designation based on Bill 185

Station Area Mixed Use designation

- New designation in the Official Plan
- Applies to large sites that could potentially be converted from employment, as identified in the Region's Municipal Comprehensive Review and ROPA 6
- Designation allows for wide range of mixed of land uses in strategic locations within Station Areas, allowing residential uses but also maintaining an employment function and jobs

Modifications from the June 2024 draft of OPA 58:

- Minor policy wording refinement

Chapter 11 – Specific Provision Areas

- Renamed from “Specific Provision Areas” to “Area Specific Policies” (ASPs)
- Minor refinements to wording to reflect changes noted above, e.g., land use name changes
- Updating of some Specific Provision Areas including: Northdale (to remove bonusing provisions); Beaver Creek Meadows Minor Node

Modifications from the June 2024 draft of OPA 58:

- Updated wording and policy cross references to parent policies
- Refinements to some ASP policies (note, additional review of all remaining ASPs to be part of Phase 2 OPR)
- ASP key maps showing specific sites are now integrated with the ASP policy directly

Chapter 12 – Implementation

- Removal of section 12.3.1 (Height and Density Bonusing)
- Various administrative updates
- Updates to policies related to Community Planning Permit Systems

Modifications from the June 2024 draft of OPA 58

- Further refinements based on PPS2024 and other Provincial legislation (e.g. pre-consultation meetings noted as voluntary)
- Additional administrative changes
- New indigenous community consultation policies

Glossary

- Updated glossary terms and additions/removals where appropriate. Some highlights include: complete communities; terms from Affordable Housing Strategy; heritage terms; etc.

Modifications from the June 2024 draft of OPA 58:

- Updated several glossary terms to be consistent with PPS2024 and the Regional Official Plan as required

Land Use Schedules

- Schedule 'A' Land Use Plan
 - Various updates including new designation/redesignations
 - Laurel/Clair Creek SPA lands deferred
 - Sites of Active Ontario Land Tribunal appeals deferred
 - Sites of Active Planning Act applications deferred as requested
- Schedule 'A1' Commercial and Mixed-Use Land Uses
 - Renamed from "Commercial Land Uses"
 - Consolidated commercial designations
 - Various updates including new designations/redesignations
- Schedule "A2" Employment Land Uses
 - Renamed from "Employment Areas"
 - Removed Academic land use designation from the Schedule
 - Redesignated sites from "Business Employment" to "Flexible Industrial"
- Schedule "A3" Open Space Land Use
 - Housekeeping amendments
- Schedule "A4" Natural System
 - Housekeeping amendments
- Schedule "A6" Specific Provision Areas (deleted)
 - Schedule has been deleted and replaced with an Appendix Map: "Area Specific Policies Appendix"
- Schedule "A6a" Specific Provision Area 20 and 45
 - Name changed from Specific Provision Area to Area Specific Policy
- Schedule "B" City Structure
 - Renamed "Urban Growth Centre" to "Primary Node"
 - Added Major Transit Station Areas and ION LRT route to the Schedule
 - Expanded some Minor Corridors
 - Added a new Minor Neighbourhood Corridors category
 - Replaced potential future node for Beaver Creek Meadows with Minor Node category
- Schedule 'B1' Built Form
 - Renamed from "Height and Density"
 - Schedule only directs height, not density
 - Changed how height is measured from metres to storeys
 - Some 25 storey height permissions increased to 30 storeys
 - Low rise heights limits modified to permit up to four storeys

- Terminology changes to refer to “rise” instead of “density” (e.g. “low density” changed to “low rise”)
- Schedule ‘B2’ – Uptown Waterloo Urban Growth Centre (deleted)
 - Reference to Urban Growth Centre no longer relevant
 - Schedule was redundant
- Schedule ‘B3’ – Designated Greenfield Areas (deleted)
 - There is no longer a need to define Designated Greenfield Areas nor distinguish between “Built Up Areas” (no longer a defined term) and “Designated Greenfield Areas”
- Schedule ‘E’ – Road Classification System
 - Housekeeping amendments
- Schedule ‘J’ – Station Areas (deleted)
 - Station Area Boundaries combined with Schedule ‘B’
 - Remaining information on Schedule already noted on Schedules ‘J1’- ‘J5’
- Phase 1 of the OPR did not address nor modify the following schedules:
 - A5, ‘A45a’, ‘A45b’, ‘A6b’, ‘A6c’, A6d’, ‘B4’, ‘C’, ‘D’, ‘F’, ‘G’, ‘H’, ‘I’

3.1 Key Considerations

As part of the changes noted above, several specific considerations and key issues were evaluated as part of Phase 1. Some of the more noteworthy changes are detailed below:

Building Height Considerations

The height permissions in the City OP have largely been in place since 2003. An important consideration for the OPR is built form, including building heights. Phase 1 includes a review of height related policies, in the context of a growing interest from the development industry to increase height permissions in appropriate areas, particularly within Major Nodes and Major Transit Station Areas. This interest is related to intensification as the core method to accommodate growth in Waterloo, the need to provide a range of housing types in the community, and economic considerations related to development financing (including the rapidly increasing cost of land).

A full and complete analysis of building heights cannot be completed within the Phase 1 timeline, and therefore will continue as part of Phase 2. However, based on the evaluation completed to date, staff recommend increasing building heights within certain parts of Major Transit Station Areas from 25 storeys to 30 storeys, as identified in the June 2024 draft of OPA 58. As part of Phase 2, staff will, with the aid of the firm SvN Architects + Planners, further review the potential for considering building heights beyond 30 storeys in certain areas of the city. This review with SvN commenced in late summer 2024 and continues. To date, given the short timelines associated with Phase 1, there is not

sufficient time to properly engage and consult with the wider community and interested groups on any proposed heights beyond the 30 storeys currently recommended.

While staff are not recommending increasing height permissions beyond 30 storeys at this time, policies noted in the recommend OPA 58 including provisions for considering increases to heights beyond the current maximums in the City OP on a case-by-case basis, through Official Plan Amendment applications, should a property owner determine that the timeline for Phase 2 does not suit their particular needs.

Density Considerations

The City OP currently sets out minimum and maximum permitted densities, measured in bedrooms per hectare. This method of measuring density (in bedrooms) is not common. This method was introduced with the 2012 Official Plan, at a time when a key community planning issue was an over concentration of four and five bedrooms units. Current planning objectives include encouraging stacked townhouses and apartment buildings to include more units with multiple bedrooms.

One goal of the OPR is to streamline development approvals, including identifying opportunities to move technical controls to the zoning by-law where appropriate. Having regard for this goal, Planning staff recommend removing most density maximums in the City OP, and replacing them with a policy framework that enables the zoning by-law to regulate densities.

In addition to reviewing the potential for increased building heights, the City has retained the firm SvN Architects + Planners to review options to measure density in the local context. This includes reviewing more common methods to measure density such as units per hectare, and floor space indexes.

Urban Design Considerations

As part of the proposed amendments to Chapter 3 (City Form), urban design policies were reviewed and updated. The Built Form Review Study noted that some existing urban design policies in the City OP were overly general and, in some instances, lacked clarity and could be improved. Further, development patterns in the city have evolved and there are an increasing number of large and more complex developments with multiple buildings and mixed-use. To address these challenges, updated urban design policies were included in the June 2024 draft of OPA 58. Policies focused on ensuring human scale design and encouraging a high standard / quality of built form, urban design and architecture.

In consultation with the community, some concerns were noted relating to the policies being too prescriptive and may be overly detailed for an Official Plan. As such, Planning staff, with the aid of SvN Architects + Planners, further reviewed and refined the policies. Items that were best left to the future Urban Design Manual were removed. The intent of the urban design policies is to provide urban design and built form guidance and clarity, while still allowing for flexibility and innovation. Clarification was added as to how urban design objectives may be implemented through non-Official Plan instruments.

Updated policies now Policies now more clearly state design objectives as well as and the overall intent and expectations for development in the city. In staff's opinion, the updated urban design policies as noted in Appendix "A", strike a better balance between setting baseline expectations for development without using overly detailed and prescriptive policy language.

Deferred Lands

On many of the land use schedules forming part of the recommend OPA 58 (see Appendix "A"), areas are noted as "deferred" meaning the new proposed policies would not apply to the subject lands. Select parcels/areas are recommended by staff to be deferred for three principal reasons, which are noted below:

1. Lands located within the Laurel/Clair Special Policy Area (LCSPA). This is an area of the City that is subject to flooding hazards but located in an area that has historically existed in the floodplain. This includes part of Waterloo Park, Uptown Waterloo, and including lands to the east of Uptown between Weber Street and University Avenue. Any development that requires an amendment to the City OP requires approval from the Province, Region, City, and the Grand River Conservation Authority. There is an ongoing study to comprehensively evaluate and update the flooding risk to the LCSPA. Until that study is completed, land use in the LCSPA can not be altered. Therefore, the LCSPA lands have been deferred, and no new land use nor change in height permissions has been applied to these lands for consistency with PPS 2024.
2. Lands that are currently part of an Ontario Land Tribunal hearing. Deferring will avoid prejudicing the appeal.
3. Lands that are currently undergoing an active Planning Act application process. Deferring will avoid prejudicing the planning application process. Exceptions have been made for select locations where the City is actively redesignating and updating land use policies / designations, such as the proposed Station Mixed Use areas recommended as a result of the Region's Municipal Comprehensive Review.

In all cases where lands are shown as "deferred", the existing land use policies and designations will continue to apply. Landowners can develop in accordance with existing policies and can apply to amend their land use in accordance with existing land use policies. Once the above 1-3 are resolved, land uses will be updated as appropriate.

Update Commercial and Employment Policies

Commercial and employment policies are to be updated as part of Phase 1 of the OPR. To assist with the proposed updates, a Commercial and Employment Policy Study (CEPS) was completed. Prior to the CEPS, the commercial and employment policy framework was last comprehensively reviewed in advance of the 2012 Official Plan. City Council received the CEPS report in October 2022 and directed staff to incorporate the finding into OPA 58 as appropriate.

The recommend OPA 58 (outlined in Appendix "A") has consolidated the existing nine commercial designations into six designations which are more streamlined commercial

and mixed-use designations. Overly prescriptive and outdated commercial requirements have been updated, including the range of uses. Updated commercial and mixed-use policies allow for mixed-use, including residential uses in most designations with strong emphasis on creating and expanding complete communities. While the nature of commercial uses has changed and continues to evolve, commercial and mixed-use policies aim to maintain commercial functions and services across the City to meet local and regional needs as appropriate and foster other objectives including modal shifts away from automobile use to the extent practicable.

Employment land use policies and objectives have evolved since the adoption of the 2012 Official Plan. Both the PPS 2024 and the updated Planning Act establish a new definition of “employment area” and make fundamental changes in what types of lands are considered employment. The Growth Plan for the Greater Golden Horseshoe has been repealed and partially folded into the PPS 2024. The City OP must be consistent with these Provincial changes (PPS 2024 and Planning Act). Further, local considerations identified through the CEPS report necessitated updates to employment policies and designations. Office uses are no longer permitted in employment areas as a primary use; as such, OPA 58 no longer emphasizes office uses to the extent that the current Official Plan does. Further, the PPS 2024 no longer considers “academic uses” to be “employment”.

The result of these changes is that two employment land use designations remain, being “Flexible Industrial” and “Business Employment”. Only Flexible Industrial areas clearly meet the definition of an “employment area” as per the PPS 2024. Lands designated Flexible Industrial have been expanded as noted in Appendix “A”. The existing Business Employment designation would not be considered an employment areas per the PPS 2024 definition but would still provide an important function of allowing certain employment related uses. Business Employment areas are proposed to allow for office, light industrial and (new to the proposed City OP) limited commercial (non-retail) uses. Generally, Business Employment areas serve as a buffer between Flexible Industrial areas and more sensitive land uses, and now allow a wider range of industrial uses. The CEPS report, the Regional Official Plan and Provincial policy all maintain the need to preserve space for employment and employment related uses, which in staff’s opinion includes the protection of employment functions in areas to be designated Business Employment.

Station Area Mixed Use Designation

The Region of Waterloo undertook a Municipal Comprehensive Review, which evaluated employment land needs at a regional level, as part of the ROP Review. As part of this process, several sites were identified for potential conversion to non-employment uses, whereby uses other than employment (or in addition to employment) could be deemed to be appropriate by the local area municipality through an amendment to its Official Plan. Some of converted employment lands located in Waterloo included “Priority Transition Areas” that were identified as part of the Station Area Planning process completed in 2017, with Council approval of OPA 14.

The approval of ROPA 6 allowed for consideration of additional uses in these Priority Transition Areas, which are strategically located in close proximity to ION LRT stops. For OPA 58, this translated to the development of a new land use designation called “Station Area Mixed Use”. Consistent with the Council approved Station Area Plans, these mixed-use sites are intended to allow a wide range of uses including commercial, employment, community and residential uses, subject to demonstrating land use compatibility and other principles of good planning. These locations are in close proximity to LRT stops (generally within 250m), which make them ideal locations for mixed use transit-oriented development. Several of the lots in these areas are large, which makes master planning an important component of the development of these sites. The Station Area Mixed Use designation is noted on Schuele ‘A’ Land Use Plan and related policies are established under a new sub-chapter of the Official Plan being Section 10.5, both of which are noted in Appendix “A” to this report.

Housing and Missing Middle Housing

Early in the OPR process, encouraging more housing, including missing middle housing (housing types between single and semi-detached housing and high-rise housing), was identified as an important community building priority.

The residential designation section in the City OP has been updated including for consistency with the Regional Official Plan. Several HAF related initiatives are advanced by the recommended updates in OPA 58, such as enabling 4 storeys in low rise residential areas, as well as creating flexibility for density shifting this consideration to zoning. In general, the residential policy section has been updated to allow more housing types without the need to amend the Plan.

The City reviewed Minor Corridors as noted on Schedule ‘B’ (City Form) of the City OP. Some corridors were expanded to facilitate redevelopment. New Minor Neighbourhood Corridors are added to further encourage and facilitate missing middle housing, as set out in OPA 58.

Staff completed an assessment of development capacity within designated Nodes and Corridors (including Major Transit Station Areas) and determined that if all properties in the Nodes and Corridors build out to maximum permissions in the Official Plan, there could be another ~260,000 bedrooms added to the City. Note: this analysis excluded properties that have been recently redeveloped, or are already within 50% of Official Plan density permissions. It also excluded lands owned by a post-secondary institution.

Complete Communities

A cornerstone priority and consideration for the OPR is the maintenance and expansion of “complete communities”. The concept of “complete communities” centres around enabling and planning for areas that contain a mix of employment use, commercial uses, a range of housing options, as well as social and community amenities, infrastructure and services. A definition of “complete community” is contained in the Glossary section of the City OP in Appendix “A” to this report.

The Regional Official Plan includes the term and concept “15-minute neighborhood,” which has a lot of overlap and similarities to the definition of “complete communities”. The City OP already uses the term “complete communities”, and the PPS 2024 uses the term “complete communities” rather than “15-minute neighbourhoods”. Therefore, staff have integrated elements of the Region’s “15-minute neighbourhood” definition with the existing definitions of “complete communities” in the current City OP and the PPS 2024. Overall, the concept remains the same: planning for compact, efficient and vibrant communities, where employment and day-to-day requirements and services are located on-site or nearby in convenient and accessible locations for people. In the case of large developments that effectively create ‘neighbourhoods’ onto themselves, planning and designing such developments as complete communities is recommended and represents good planning in staff’s opinion. More generally, the concept of complete communities is an important consideration when planning all land use areas and designations.

3.2 Feedback Received

The draft OPA 58 was released for public comment and review in June 2024. Several submissions, comments and requests have been received by City staff since June. All submission received have been reviewed and assessed against the draft City OP. A summary of all submissions received is detailed in a table in Appendix “B” to this report. The summary table also includes how staff have addressed or considered each submission and issue raised. Many submissions centered around common themes including:

- Technical corrections
- Requests for clarification
- Alternative policy wording
- Requests for increasing height and density
- Requests for a change or alteration in land use
- Requests for modifications or deletions of urban design policies
- Suggestions for addressing additional concepts

After considering the feedback, Planning staff made several updates, corrections and modifications to OPA 58, in addition to staff initiated revisions based on further review and analysis of the June 2024 draft Official Plan. However, given Phase 1 timelines, staff have not drafted a comprehensive response to each request received. Given the specific nature and context of some requests, it is recommended that several matters be addressed through the next phase of the OPR (to commence following Phase 1), to allow sufficient time for comprehensive assessment and engagement.

4.0 Next Steps

Should City Council adopt OPA 58 which would implement Phase 1 of the OPR, it is the intent of Planning staff to immediately commence Phase 2. Phase 2 will address matters carried forward from Phase 1, and bring forward updates to Official Plan policies for

Chapter 4 (“Arts, Culture, Heritage, and Leisure”), Chapter 5 (“Networks”), Chapter 6 (“Transportation” - majority of the chapter), and further refinements to Area Specific Policies.

Several site-specific requests were submitted to the City in Fall 2024. Planning staff will review each submission in detail through Phase 2 and provide recommendations for Council’s consideration.

Phase 2 will also include further evaluation and engagement on building heights, based on feedback received through Phase 1, as discussed in Section 3.1 of this report.

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Karen Ali & Alan Jeffery	461 Columbia Street West	21-Jun-24	- Indicated desire for a low density residential land use designation with no more than 3 storeys	Designation changed from high rise residential to medium rise residential
Bill Gastmeier (Mount Zion Lutheran Church)	237 Dawson Street	26-Jun-24	- Expressed support for the proposed redesignation of Mount Zion Lutheran Church to "Medium Rise Residential"	Staff recommend site be redesignated to medium rise residential
Douglas Stewart (Arcadis)	500 Erbsville Road	26-Jun-24	- Stated that the "Low Density Residential" designation for the property is a mistake and that the entire property should be designated as "Open Space"	Pre existing mapping error - Issues have been corrected Storm water management use has been confirmed
			- Would like confirmation that storm water management facilities are permitted in the "Open Space" designation	
Trevor Hawkins (MHBC)	81-85 Bridgeport Road East	03-Jul-24	- Sought clarification on meaning of "Deferred" designation and how deferral would be resolved	Deferral refers to any property subject to OLT appeal or within the Laurel/Clair SPA
			- Requested that City updated height permissions to reflect January OLT decision	Changes were not reflected in the June 2024 draft. Changes have been updated per OLT decision
			- Requested that City update mapping to reflect Area Specific Policy from January OLT decision.	
			- Expressed support for removal of maximum densities, but encourage a switch from bedroom per hectare based density regulations to Floor Space Index or Floor Area Ratio	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Asked about the italicization of active uses in the "Mixed-Use Community" designation	Issue has been corrected
Trevor Hawkins (MHBC)	420 Weber Street North	05-Jul-24	- Indicated support of property's redesignation from "Business Employment" to "Mixed-Use Community"	Noted
			- Suggested including residential uses as a primary use in "Mixed-Use Community" designation	Residential has been added as a primary use in 'Mixed-Use Community' and is allowed in accordance with the criteria in draft policy 10.2.2.7
			- Asked about the italicization of active uses in the designation	Issue has been corrected
			- Questioned what "pre-existing commercial uses zoned on a site" would mean	The reference to 'zoned' has been removed. The intent of the policy is to facilitate mixed-use redevelopment while maintaining the existing commercial floor space.
			- Requested inclusion of their property in adjacent "Major Node"	Site is currently a minor node, no change in urban structure at this time but may be reviewed further based in later phases.
			- Indicated belief that property has potential for heights greater than the 25 storeys contemplated	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Expressed support for removal of maximum densities, but encourage a switch from bedroom per hectare based density regulations to Floor Space Index or Floor Area Ratio	
			- Questioned the provision requiring "community benefits" in exchange for additional height	Community benefits as per former section 37 provision have been removed. Remaining language regarding community benefits has been clarified. There are not community benefits in exchange for height
Trevor Hawkins (MHBC)	400 Millennium Boulevard	11-Jul-24	- Indicated support of the property's removal from "Employment" land use designation	Land use designations on the site will be deferred due to active application
			- Opposed "Low Rise Residential" designation, decrease in height from previously permitted 27 metres	
			- Indicated belief that redesignation of lands through OP review was premature	
			- Questioned why this property was not identified as "Deferred", as with other active applications	

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Supported inclusion of lands within "Minor Corridor" on Schedule B	
			- Encouraged a switch from bedroom per hectare based density regulations to Floor Space Index or Floor Area Ratio	
Jen Vasic (Councillor - Ward 5)	Neighbourhood Commercial (City-Wide)	16-Jul-24	- Expressed desire to enable neighbourhood businesses as-of-right through the Official Plan and Zoning By-law.	Limited commercial uses added to low rise residential designation
			- Identified sections 3.8 and 3.8.2.(2).(d) as generally enabling neighbourhood commercial.	Limited commercial use enabled in residential designation
			- Highlighted sections 3.6.(1) and 3.8.1.(1) as potentially inhibiting neighbourhood commercial.	These policies do not prohibit neighbourhood level commercial uses, see residential designation
			- Expressed concerns over restrictions for non-residential uses in "Low Rise Residential" designation.	Policies have been updated since this draft, limited commercial uses permitted in low rise residential areas
			- Explained how the vision of neighbourhood commercial differs from that of a 15-minute city	15-minute neighbourhood reference have been replaced by "complete community" term
			- Suggested that policies for "Low Rise Residential" designation be brought closer to those for medium rise and high rise designations, with regards to commercial uses.	Limited commercial uses permitted in low rise residential areas. Mid rise commercial uses allows some higher intensity uses
			- question on the vision for "Nodes, Corridors, and MTSA Commercial"	"City Structure" section 3.6 outlines role and planned function of Nodes, Corridors and MTSA's
			- Sought clarification on policies that only allow commercial uses in mixed-use buildings in residential designations	Policy has since been amended, ancillary uses should be in mixed use buildings, some commercial uses permitted as a complementary use
			- Support the intent of "Convenience Commercial" designation, could it be applied more widely?	Convenience commercial provides an option for various neighbourhoods. Balance between supporting neighborhoods and enough population to support a business
			- Questioned how prohibition on single-use residential buildings in "Convenience Commercial" works	Intent is to avoid replacing commercial function with a stand-alone residential use
Jen Vasic (Councillor - Ward 5)	Chapter 1, 2 & 7	18-Jul-24	reference to "Zoning by-Law" has been changed to "Zoning", why	All references changed to Zoning By-Law
			What's the reason for italicizing words - is it when they're in the definitions list?	Yes, italics indicate a glossary term, staff will evaluate the feasibility of linking terms to glossary in final approved plan
			In social sustainability, what is "sense of identity" meant to capture?	Term removed
			15 minute communities vs Complete communities	All references to 15 min communities change to complete community, term is already used and includes similar goals and outcomes
			Chapter 7: Economy – why was it deleted?	Streamline the OP policies. Relevant policies were moved to various sections of the OP where relevant
Jen Vasic (Councillor - Ward 5)	Chapter 3: City Form (City-Wide)	18-Jul-24	- Asked if arts and creative industries team has provided input on the vision statement, name clarification	Arts and heritage will be reviewed in more detail in the next phase of the OP Review.
			- Suggested changing wording around height permissions to emphasize process for height increases.	Noted
			- Questioned why density permissions were being removed from the OP.	Removed to be better regulated by zoning bylaw and to streamline development approval and review and to facilitate housing
			- Supported section 3.4.(7) with the exception of "community character"	The term "community character" updated throughout the plan
			- Asked about the implications of "Major Node" designation for properties currently under OLT appeal.	files that are before the OLT have been deferred to avoid prejudice to the decision
			- Questioned need to include permissions for drive throughs given climate emergency.	It is likely not possible to prohibit drive throughs completely, municipalities can restrict and limit where they are permitted.

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Asked whether focus on employment uses in Uptown was appropriate given decreased office demand.	The CEPS notes that office uses in the Uptown should remain as a policy objective
			- Suggested including explicit permissions for restaurants in commercial land use permissions. (policy 3.7 (12))	Commercial uses are further defined in the commercial section and the Uptown Mixed Use designation
			- Supported section 3.10.5 on Urban Design for Large Sites.	Noted
Jen Vasic (Councillor - Ward 5)	Chapter 10: Land Use Policies (City-Wide)	18-Jul-24	- Sought rationale behind vision for maintaining character of low rise residential areas in chapter 10.	Noted; vision section for Low rise residential revised and updated.
			- Questioned how sections 10.1.1.(12-14) would apply if height limit is removed by senior government.	Intent is to maintain some direction on urban design regardless if height caps are removed
			- Asked how work of Grant/Michelle is being coordinated with OP policies on rental replacement and condominium conversions.	Intent is that updated policies will complement affordable housing strategy
			- Asked whether Bed and Breakfasts are only allowed in Low Rise Residential areas and Uptown Core.	Bed and breakfast establishment only permitted in the LRR and Uptown Node areas
			- Indicated contrast between vision of local neighbourhood commercial and "Mixed-Use Community Commercial" policies that encourage destinations and focal points.	Local commercial uses added to the low rise residential designation, Mixed Use community is intended to be a more commercial and mixed use area
			- Highlight continued use of "automobile-oriented" in 10.2.2.6.(3) despite removal elsewhere.	Noted and updated
			- Asked what "prestigious office" refers to in "Business Employment" designation, section 10.3.3.2.(9).	Intended to refer to encourage professional and advanced tech (software) office uses; term has been removed
			- Suggested increasing height permissions for post-secondary institutions.	Height limits being reviewed in all land use categories
			- Asked if "indigenous vegetation/plant species" in 10.6.(11) was equivalent to native species.	yes both terms refer to the same thing. For consideration in future phases.
			- Supported an intergenerational approach to parks amenities, accommodating all ages.	Consideration for future phases
			- Asked how OP policies could support alternative burial practices and development of the cemetery.	Consideration for future phases but generally OP policies do not address this level of detail
			- Highlighted several spelling and grammar mistakes throughout the draft OP	Noted and updated
Jen Vasic (Councillor - Ward 5)	Chapter 11: Area Specific Policies (City-Wide)	18-Jul-24	- Which ASP is 2025 University Ave E?	No ASP has been assigned yet. Site is being reviewed under a separate planning process
			- Asked how many properties in ASP 2 are still on private services and the potential for impacts.	This is an existing ASP, no change other than name change (from Site Specific Provision to Area Specific Policy) is proposed; the specifics of the ASP were not reviewed in detail
			- Asked whether Piller's was aware of ASPs 5 and 7	yes, the ASP is preexisting to the OP review. Landowner is aware and supportive of the proposed modifications
			- Asked for more background on 105 University Ave E and questioned why it was subject to ASP 22 when it has been marked "Deferred" on the mapping.	Dite is deferred due to Clair/Laurel Creek SPA, existing land use permissions will continue to be in place
			- Questioned why ASP 24 was coming forward for 50 Weber St N when use has existed for so long.	this is an existing ASP, no change other than name change (from Site Specific Provision to Area Specific Policy) is proposed; the specifics of the ASP were not review in detail
			- why ASP 48 was coming forward for 237-239 Auburn Dr when it is already medium high rise	This is an existing ASP, no change other than name change (from Site Specific Provision to Area Specific Policy) is proposed; the specifics of the ASP were not review in detail
Jen Vasic (Councillor - Ward 5)	Chapter 12: Implementation (City-Wide)	18-Jul-24	- Asked where Schedule G relating to road widenings was.	No road widening updates as part of Phase 1. Transpiration will be reviewed in Phase 2. Earlier drafts included existing table of content. Recommended draft has been updated
			- Questioned whether policies surrounding subdivision approval process would change.	policies could be updated in later phases when transition occurs
			- Asked whether section 12.2.16.(4) indicated that a Community Planning Development Permit By-law is forthcoming and how Council will delegate authority for this.	CPPS policies have been updated in the recommend OP to enable CPPS. A full study for CPPS including how to be implemented is ongoing

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Asked why "Other Relevant Legislation" was highlighted yellow in section 12.2.17.	This was a notation for further review. Policies have been updated
			- Asked why Community Planning Development Permit was not included in delegated authority list (12.2.18)	CPPS is a standalone item with additional policies.
Jen Vasic (Councillor - Ward 5)	READI Team (City-wide)	18-Jul-24	- Asked if READI team had been consulted on Draft OP	City READI team was circulated, reviewed and provided comments
			- Expressed a preference for "resident" rather than "citizen"	Noted and updated
			- Asked difference between "pedestrian scale" and "human scale" and whether the former includes rolling	Both terms are similar and describe the measure of the size of the building/structure and its parts in relation to the person or people using/experiencing it
			- Suggested updating territorial acknowledgement to align with Council's recent changes	Noted and updated
			- Questioned use of term "indigenous reconciliation" as opposed to "truth and reconciliation" in s. 2.2	Noted and updated
			- Asked if "rolling" should be added to section 2.3	Noted and updated
			- Suggested making explicit reference to accessible design in urban design section 3(g)	Noted and updated
			- Asked if AODA requires private sector to make buildings barrier-free	Buildings are subject to building code requirements and applicable municipal by-laws
			- Mentioned issues surrounding barrier-free access and hydro poles and whether it could be added to OP	Noted but this level of detail should be directed to Urban Design Manual or Comprehensive Engineering & Landscape Manual
			- are there alternatives to the term "master plan"?	References are to other city plans such as the Transportation Master Plan, etc.
			- Provided comments on distinction between special needs and disability with regard to special needs housing	This is a define term from the ROP in relation to housing
Trevor Hawkins (MHBC)	630 Weber Street North	09-Aug-24	- Expressed general support for change in designation from "Business Employment" to "Flexible Industrial"	Noted
			- Raised some concerns about office uses only being permitted as an ancillary, not primary use	Office must be ancillary to the primary employment use following direction from PPS2024
			- Supported zoning regulations to allow for an appropriate amount of ancillary office uses	
			- Supported change in measuring height from metres to storeys	Noted
Andrea Sinclair (MHBC)	167-171 King Street South	19-Aug-24	- Expressed opinion that associated zoning changes should be advanced at the same time as new OP	Staff will advance updated zoning following approval of the updated policy framework in the City OP
			- Stated that IZ needs to be accompanied by significant new height & density permissions to make sense	Staff have taken into consideration Council's recent decision to pursue Inclusionary Zoning and will make recommendations following on the ongoing review of height and density policies.
			- Highlighted NBLC recommendations for significant height & density increases alongside IZ (like Kitchener)	
			- Expressed belief that high rise projects often need more than 30 stories to be financially feasible.	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Suggested that an increased high limit of 40-storeys would be more appropriate	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Requested more clarity and transparency on the density permissions that will be applied through zoning.	Staff will advance updated zoning following approval of the updated policy framework in the City OP
			- Urged the City to move away from measuring density in bedrooms/hectare and towards another metric	A consultant retained to review height and density policies; this matter is currently under active consideration

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Peter Graham (Six Nations)	Indigenous (City-wide)	20-Aug-24	- Noted lack of language relating indigenous consultation in sections 11 & 12.	Policies have been updated to reflect Indigenous consultation requirements in alignment with the PPS, 2024.
			- Requested that the plan at least adopt minimum language of PPS and plan to actualize.	
			- Recommended additional consultation as a complete application requirement.	
Maureen Zunti	Urban Boundary	26-Aug-24	- Asked if any urban boundary expansion was being contemplated as part of OP Review	Urban boundary expansion is not contemplated at this time
Laura Jamieson	450 Erb Street West,	29-Aug-24	- Suggested that minimum residential densities only apply where residential uses are being proposed.	Minimum residential densities are required where residential uses are permitted, regardless of the existing use. If residential is not proposed, then the policy would not apply. Residential uses are permitted but not be required in commercial designations. Commercial and mixed use sites can be redeveloped without any residential components.
(Zelinka Priamo)	930 Erb Street West, &		- Requested greater flexibility for new additions or interim low-rise development for existing low rise sites	Existing policy is intended to encourage intensification in Nodes, Corridors and MTSAs. The policy "discourages" vs "prohibits" low rise forms in these intensification areas and it is not applicable to existing structures. Staff's opinion is that the recommended policy does allow for flexibility and discretion.
	24 Forwell Creek Road		- Asked for increased flexibility for urban design policies surrounding pedestrian entrances in section 3.10.1.(1).(d)	Urban Desing policies have been amended
			- Asked for clarification on what would be defined as a "large building" and to clarify that not all elements in section 3.10.1.(1).(f) are required.	Urban Desing policies have been amended – reference has been removed
			- Policy 3.10.1(1)(q) states “In terms of priorities, to place greater emphasis on urban design compared to density.” We seek clarification as to the intent of this policy, which appears to be contradictory to new draft Policy 3.4(7) E120	Intent of the policy is to allow equal consideration of design and density. policies have been restructured
			- Requested greater flexibility on green building technology requirements in section 3.10.1.(5).(a)	Urban Desing policies have been amended - sustainable design to be reevaluated
			- Asked for flexibility in requirements to provide mix of uses on large sites (section 3.10.5.(1))	Urban Desing policies have been amended - large sites has been scoped and policy refined
			- Sought clarification on what would be considered a "large site"	see above
			- Requested flexibility on requirement to have a phasing strategy for large sites under section 3.10.5.(4)	Urban Desing policies have been amended - large sites has been scoped and policy refined
			- Sought to ensure that existing stand-alone commercial uses will continue to be permitted on larger sites and in Mixed-Use Community designation.	Redevelopment is included in the defined term "development". Intent of the policy is for new development to encourage mixed use. However, as a commercial designation, stand alone commercial will continue to be permitted. For clarity, new policies were added: "(b) Notwithstanding policy 10.2.1 (6) stand alone and single use commercial uses will continue to be permitted on commercial and mixed use designated sites. "
			- Choice Lands should continue to permit large food stores (greater than 8,000 square metres), and it is suggested that “new” be added before “... food stores may be permitted” to recognize existing uses. Additionally, the policy referenced should be “10.2.2.3” rather than “10.2.2.4”;	Smaller to mid sized commercial areas permitted in minor nodes similar to existing framework, policy does not remove existing permissions. Commercial policies modified to clarify that food stores are encouraged within the designation and that small scale food stores will be directed to minor nodes and minor corridors.
			- Suggested that policies requiring no net loss of commercial floor space be re-evaluated	Policy has been revised and clarified.
			- Sought flexibility for zoning provisions relating to 4.5 metre ground floor heights	Policy was refined to remove exact measurement of height. Added the words "Where appropriate" to policy 10.2.4g
			- Asked what was meant by "large development sites" subject to master plans in section 12.2.3.(1)	Urban Desing policies have been amended - large sites has been scoped and policy refined

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Highlighted that municipalities were no longer able to require pre-consultation	Pre consultation can no longer be required. Policy has been updated to reflect provisions as per Bill 185
Jonathan Rodger (Zelinka Priamo)	650-660 Erb Street West	29-Aug-24	- Asked what the grey lines within the property on Schedule B1 were	The hatched grey lines indicate the hydro easement on Schedule B1
			- Suggested that minimum residential densities only apply where residential uses are being proposed.	Minimum residential densities are required where residential uses are permitted, regardless of the existing use. If residential is not proposed, then the policy would not apply.
			- Requested greater flexibility for new additions or interim low-rise development for existing low rise sites	Existing low-rise sites may continue. Policies discourage low rise redevelopment but do not prohibit them
			- Asked for increased flexibility for urban design policies surrounding pedestrian entrances in section 3.10.1.(1).(d)	Policy has been amended and clarified
			- Asked for clarification on what would be defined as a "large building" and to clarify that not all elements in section 3.10.1.(1).(f) are required.	The term 'large site' has been updated but will be further refined through the future implementation of urban design standards and guidelines
			- Suggested that section 3.10.1.(1).q be removed to weigh all city building objectives without favouring urban design	Policy has been amended to require a balanced approach, however good urban design is a key planning objective of the City of Waterloo
			- Requested greater flexibility on green building technology requirements in section 3.10.1.(5).(a)	Urban Design policies have been amended
			- Asked for flexibility in requirements to provide mix of uses on large sites (section 3.10.5.(1))	The term 'large site' has been updated but will be further refined through the future implementation of urban design standards and guidelines
			- Sought clarification on what would be considered a "large site"	The term 'large site' has been updated but will be further refined through the future implementation of urban design standards and guidelines
			- Requested flexibility on requirement to have a phasing strategy for large sites under section 3.10.5.(4)	Urban Design policies have been amended
			- Sought to ensure that existing stand-alone commercial uses will continue to be permitted on larger sites and in Mixed-Use Community designation.	Stand alone commercial uses will continue to be permitted in commercial designated lands
			- Want to ensure that property continues to permit large scale commercial uses	Permissions for large scale commercial uses are still in place within the Mixed Use Community designation
			- Suggested that gas stations/charging stations not be required to be located in mixed- use building	Policy has been clarified and amended
			- Suggested that policies requiring no net loss of commercial floor space be re-evaluated	Policy has been clarified and amended
			- Sought flexibility for zoning provisions relating to 4.5 metre ground floor heights	Policy has been amended, removed from the OP, ground floor height requirements noted in the ZBL
			- Highlighted some out of date policy references that remain in ASP 8	ASP 8 has been clarified
			- Asked what was meant by "large development sites" subject to master plans in section 12.2.3.(1)	The term 'large site' has been updated but will be further refined through the future implementation of urban design standards and guidelines
			- Highlighted that municipalities were no longer able to require pre-consultation	Pre consultation can no longer be required. Policy has been updated to reflect provisions as per Bill 185
Mark LaForme (MCFN)	Indigenous (City-wide)	30-Aug-24	- Suggested including recognition of MCFN territory as part of planning context	Recognition of territory, stewardship, title, and cultural heritage will proceed through a future phase of the Official Plan Review
			- Suggested recognizing MCFN stewardship of land & water, aboriginal title over waterways	
			- Highlighting importance of policies to protect indigenous cultural heritage	
			- Suggested policies that acknowledge MCFN rights to be sustained by their territory	
			- Suggested establishing criteria to trigger consultation/engagement with MCFN	Policies have been updated to reflect Indigenous consultation requirements in alignment with the PPS, 2024.
			- Suggested including language around consultation process with MCFN	

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Andrea Sinclair & Meghan Lippert (MHBC)	92 Erb Street East	30-Aug-24	- Supported the redesignation of property to Medium Rise Residential	Noted
			- Suggested increasing height permissions within existing nodes and corridors	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Requested update on status of revised SPA policy framework when available	Existing policies and permissions will remain in place until the SPA policy framework is completed
			- Sought meeting to discuss implementing zoning in relation to deferred SPA properties	
Louise McLaren	General (City-wide)	30-Aug-24	- Suggested expiry of approvals to incentivize developers to use permissions they get	Use It or Lose It' permissions are currently being studied at the Provincial level, and the ability for municipalities to issue time-based zoning permissions may be enabled through forthcoming Provincial legislation.
			- Proposed a higher tax rate for vacant lots and storefronts	Noted. Tax policy is not within the scope of the Official Plan Review.
			- Stated that OP should encourage mix of units, not just one-bedrooms	The Official Plan encourages development of a range and mix of housing options, including multi-bedroom units.
			- Complained about land use policies that compartmentalize uses in areas of city	Permissions for small scale commercial uses in low rise residential areas have been increased, subject to implementing zoning.
			- Proposed that all types of small businesses be allowed near residential neighbourhoods	Permissions for small scale commercial uses in low rise residential areas have been increased, subject to implementing zoning.
			- Complained that missing middle housing was not being addressed (only one-bedroom towers)	The Official Plan encourages development of a range and mix of housing options, including multi-bedroom units.
			- Stated that one-bedroom units serve to create isolation, not community	The Official Plan encourages development of a range and mix of housing options, including multi-bedroom units.
			- Asked what Cash-in-lieu of parkland was paying for and how City used it	Cash-in-lieu of parkland is collected by the City at its discretion in lieu of the conveyance of parkland. Funds are primarily allocated towards future parkland acquisition.
			- Suggested that City sell parkland to adjacent property owners	Transactions regarding City-Owned lands are not within the scope of the Official Plan Review. The City's general practices is to not sell parkland, although it has the ability to do so at its discretion.
			- Suggested naturalizing underutilized sports fields	Operation of sports fields is outside of the scope of the Official Plan Review
			- Noted that the City continues to plant columnar trees despite policy preference for shade trees	Noted, site plan consideration and park design consideration
			- Encouraged use of hydro corridors for amenities like playing fields and dog parks	Noted, to consider further during review of parks and open space, however hydro transmission and distribution must be protected (including the ability to expand)
			- Suggested improving greenspaces by adding amenities like benches, waste bins, etc.	Noted, site plan consideration and park design consideration
			- Asked for clarification what priority public spaces are and how they are identified	Identified as part of the Station Area Planning process – see individual Station Area Plans
Trevor Hawkins & Meghan Lippert (MHBC)	Wilfrid Laurier University	30-Aug-24	- Supported the redesignation of university lands to Major Institutional - Academic	Noted
			- Requested that all of WLU landholdings be designated Major Institutional - Academic	Noted, however land use designations are not applied based on ownership. MI-A designation applied where appropriate.
			- Asked that term "main campus" be removed from MI-A policies, to apply to all university lands	Open to further discussions related to this request, however main campus' have some distinct characteristics that should be considered in planning policy
			- Suggested that language proscribing the nature of campus master planning be removed	Policy supports intent of the City related to comprehensive and integrated planning. Applies to all institutions, not just WLU

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Requested that section 10.4.(14) be changed to acknowledge potential partnerships between WLU and third parties to provide student residences	Policy signals City's intent, does not preclude other types of housing
			- Requested that WLU properties along Ezra & Bricker west of Clayfield be included in ASP 20	Staff support inclusion in ASP to permit dual designation
			- Requested that WLU properties on Albert south of Bricker be included in ASP 20J	Staff support inclusion in ASP to permit dual designation
			- Asked that maximum density policies be removed from ASPs 20B, C, D, E, F, G, I, K, & L	Staff is open to removing maximum densities from ASP 20 lands
			- Requested clarity as to whether max density in Zoning will still be bedrooms per hectare	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Encouraged City to use alternative density metrics (FSI, units per hectare, etc.)	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Suggested increasing height & density permissions on Ezra & Bricker for better transition to HCD	Has not been reviewed as part of Phase 1, has an impact on cultural heritage and other property owners
			- Requested increased height permissions of 6 storeys for University Stadium lands	Has not been reviewed as part of Phase 1, has an impact on cultural heritage and other property owners
			- Requested that "Potential University Use Area" on Schedule D1 include all WLU lands within HCD	Has not been reviewed as part of Phase 1, will be part of cultural heritage review
			- Opposed inclusion of 75 University Ave W in CHL b/c of impacts on potential future development	Has not been reviewed as part of Phase 1, will be part of cultural heritage review
			- Asked for clarification on how parking changes within MTSA were being handled by the City	Parking regulations will be covered through subsequent Zoning By-law
			- Asked for clarification regarding current designations and SPA deferral on 81 Lodge Street	Existing policies and permissions will remain in place until the SPA policy framework is completed
			- Requested that designations and policies applying to 79 Seagram Dr be changed	Designation will be changed, mark driveway as part of road parcel
Steven Qi (Design Plan Services)	321 Weber Street North	03-Sep-24	- Requested that property and those surrounding it be designated "Mixed Use Community"	A potential ASP for these properties will be reviewed in Phase 2
			- Expressed belief that "Mixed Use Community" designation better aligned with local, regional, and provincial policy objectives compared to proposed "Corridor Commercial" designation	A potential ASP for these properties will be reviewed in Phase 2
Andrea Sinclair (MHBC)	209, 225, & 217 King Street South, 11 John Street West, & 176, 180, & 182 Caroline Street South	23-Sep-24	- Expressed general support for increased height permissions and removal of max densities	Noted
			- Commented that associated zoning changes should be advanced at the same time as new OP	Staff will advance updated zoning following approval of the updated policy framework in the City OP
			- Stated that IZ needs to be accompanied by significant new height & density permissions to make sense	Staff have taken into consideration Council's recent decision to pursue Inclusionary Zoning and will make recommendations following on the ongoing review of height and density policies.
			- Highlighted NBLC recommendations for significant height & density increases alongside IZ (like Kitchener)	Staff have taken into consideration Council's recent decision to pursue Inclusionary Zoning and will make recommendations following on the ongoing review of height and density policies.
			- Expressed belief that high rise projects often need more than 30 stories to be financially feasible.	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Requested more clarity and transparency on the density permissions that will be applied through zoning.	A consultant retained to review height and density policies; this matter is currently under active consideration

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Expressed concern that zoning may implement a density cap that does not currently exist.	Zoning By-law Review will follow adoption of OP, density considerations to be reviewed at that time
			- Proposed that City remove density caps entirely, including from implementing zoning.	Zoning By-law Review will follow adoption of OP, density considerations to be reviewed at that time
David Aston (MHBC)	Waterloo Commons & The Boardwalk	23-Sep-24	- Requested that Transportation Schedule be updated to include new collector road from Erb Street to the Thorndale roundabout identified through Regional Class EA	Transportation schedules has been updated as part of housekeeping changes
			- Supported designation of Waterloo Common as "Mixed-Use Community" but noted ongoing OPA to evaluate lands	Noted, land use will be updated as needed based on outcome of the OPA process
			- Suggested that Urban Design policies could impact creativity or innovation,	Urban Design policies have been amended
Pierre Chauvin (MHBC)	475 & 485 King Street North	23-Sep-24	- Expected that deferral of lands will be removed once OLT makes a decision	Deferrals will be removed once OLT matter has been resolved
			- Expressed concern that urban design regulations were overly prescriptive	Urban Design policies have been amended
Andrea Sinclair (MHBC) on behalf of Lexington Park Real Estate Capital Inc.	Multiple properties across the City	23-Sep-24	- Suggested that increased height permissions be considered city-wide and not just in MTSAs	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Highlighted that the majority of height permissions have not changed in 20 years	A consultant retained to review height and density policies; this matter is currently under active consideration. The length of time that a policy exist is not a determinant as to whether the policy represents good planning in the local context.
			- Expressed general support for increased height permissions and removal of max densities	Noted
			- Expressed belief that associated zoning changes should be advanced at the same time as new OP	Staff will advance updated zoning following approval of the updated policy framework in the City OP
			- Stated that IZ needs to be accompanied by significant new height & density permissions to make sense	Staff have taken into consideration Council's recent decision to pursue Inclusionary Zoning and will make recommendations following on the ongoing review of height and density policies.
			- Suggested permitting a broader range of uses in employment areas to allow intensification	Employment policy framework has been updated to ensure conformity with PPS2024. Some employment areas proposed to be redesignated to Station Area Mixed Use
			- Supported removal of the "Office Residential (Mixed Use Office)" designation	Noted
			- Suggested that OP encourage a framework to allow parking reductions without ZBA	This is being done for affordable housing, refer to HAF initiative #8
			- Requested that City keep public updated with status of Laurel/Clair SPA studies	Noted
David Aston & Aleah Clarke (MHBC)	665 & 720 Erbsville Road	23-Sep-24	- concern with policy 3.4.(7) ("optimized rather than maximize height/density") as potentially discouraging intensification	Planning Act refers to optimizing density rather than maximizing density, OP allows for sufficient opportunity for intensification
			- Expressed concern that urban design regulations were overly prescriptive	Urban Design policies have been amended
			- Expressed concern that section 3.10.1.(1).(d) concerning entrances was too proscriptive	Urban Design policies have been amended
			- Suggested that section 3.10.1.(1).(q) ("urban design over density") could impede new housing	Urban Design policies have been amended

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Requested clarification on how section 3.10.1.(5).(a) (green building standards) to be implemented	Implementation will be determined at a future date
			- Highlighted that only allowing apartments and stacked townhouse in "Low Rise Residential" designation on unique sites limits mix of housing and runs contrary to ROPA 6 requirements	OPA 58 has significant enhanced permissions for these uses in Low Rise Residential areas
			- Suggested allowing four-plex, multi-plex, stacked/back-to-back townhouses, and low-rise apartment buildings in the "Low Rise Residential" designation.	Stacked townhouses, and low-rise apartments are permitted in Low Rise Residential subject to Zoning By-law.
			- commented that 3-storey height limit for stacked townhouses was overly restrictive, recommended that it should be raised to 3.5 storeys.	Heights in low rise areas are anticipated to increase to four storeys as per Four Units, Four Storeys initiative.
Sam Goncalves-Horton, Violette Minastirliu, & Manuela D'Chuna (UW NDP & UW Planning Student Association)	Parking (City-wide)	23-Sep-24	- Argued that minimum parking requirements are an outdated planning tool that do not meet modern city-building objectives and should be removed.	Parking is not required within Major Transit Station Areas. The OP encourage zoning to minimize parking where appropriate.
			- Suggested that minimum parking requirements contribute to poor urban design and a homogenized built environment	
			- Discussed the financial burdens of parking and car ownership on individuals, cities, & developers	Noted
Boban Jokanovic	14 Roosevelt Avenue	25-Sep-24	- Requested that property be rezoned from R1 to RMU-20 (Added to Erb Street Corridor)	Parcel could be up designated through OPA process, but not identified for corridor expansion as part of OP Review corridor expansion, initial review of corridors indicated that sufficient depth already exists.
			- Stated that rezoning property would allow for greater intensification & density	Parcel could be up designated through OPA process, but not identified for corridor expansion as part of OP Review corridor expansion, initial review of corridors indicated that sufficient depth already exists.
			- Argued that consolidating property with those along Erb would allow for up to 72 additional bedrooms	Parcel could be up designated through OPA process, but not identified for corridor expansion as part of OP Review corridor expansion, initial review of corridors indicated that sufficient depth already exists.
Kae Elgie	General (City-wide)	27-Sep-24	- Asked why these chapters were being brought forward before other chapters and what implications are	Sections chosen for Phase 1 intended to bring OP into conformity with ROP and Provincial Plans and for HAF Initiatives
			- Asked for explanation on deferred areas on the plan, are they forever in limbo	Some deferred due to active OLT litigation, large deferral due to Laurel Creek SPA, deferrals not intended to be permanent
			- Expressed concern about increasing maximum height on King Street from 4 to 5 storeys	5 storey maximum was based on translation of 16 metre limit to storeys. OP moved from "metre" to "storey" height measurement in OP. the OP has modified text and mapping to 4 storeys for Uptown properties similar to existing zoning.
			- Suggested that changing height regulations from metres to storeys opens up to "storey stretch"	Zoning can apply controls if necessary to address "storey stretch"
			- Asked if there was an official height for a storey (in OP, Zoning, Building Code, etc.).	Not an official metric but general guide is ~3m; ~3.25m is becoming more common in design
			- Asked what "Greenfield Areas" are and about Rural designation	Existing OP includes a map identifying greenfield lands, reference to designated greenfield areas has been changed to designated growth area as per updated PPS 2024. City does have some Rural Lands

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Asked what "passive noise attenuation measures" are in section 3.8.2.(i)	Defined term, see glossary e.g. site design to reduce noise impacts vs structural elements such as cladding systems
			- Asked if section 3.10.1 (General Urban Design) was right spot for High Performance/Green Development Standards.	Location in the OP TBD, future policies may be placed in this section or more likely in Chapter 12 Implementation.
			- Commented that section 3.10.3.(6) encourages underground parking in Uptown, but this is difficult to accomplish within the floodplain.	Carry over policy, added "where feasible" to clarify
			- Highlighted a typo in section 3.10.4.(10) - "here"	Noted and updated
			- Expressed support for home occupation permissions, but had concerns about restrictions on outdoor storage/advertising, and good shipment/delivery	Home occupations currently already permitted, provision in the policy is intended to strike a balance between allowing home occupations and minimaxing potential adverse impacts on adjacent residents.
			- Suggested including High Performance Development Standards in section 10.1.1.(6)	Location in the OP TBD, future policies are likely to be added to Chapter 12 Implementation.
			- Requested that a statement be included in OP acknowledging Waterloo's climate commitments	Some wording updated in Chapter 1, additional review in later phases
			- Requested statement be included that developments/changes be viewed through ecological lens	Some wording updated in Chapter 1, additional review in later phases
			- Asked what the intention of policy 10.1.1.(7) is regarding re-subdivision	Existing policy, intent is to limit subdividing land to add lower density buildings on sites intended for higher density development.
			- Asked what "net gross density calculation of in bedrooms per hectare" means.	Enabling policy to allow a density measure of bedrooms / ha to be used
			- Suggested that stronger wording than "may be contemplated" be used in section 10.1.1.(12)	Policies allow a range of considerations when assessing if an increase in height beyond OP limits is warranted.
			- Supported conservation of cultural heritage resources when contemplating increased height.	Noted
			- Requested inclusion of climate commitment as consideration for increased height.	Sustainable design and sustainable building features added to list of considerations
			- Suggested including "minimize wind tunnel effects" in section 10.1.1.(13)	Consideration for wind added to list
			- Supported section 10.1.1.(15) (regarding heights & senior governments)	Noted
			- Highlighted mistaken reference to section 3.4.(2) in section 10.1.2.(5)	Removed, OP no longer includes density requirements
			- Asked why City was restricting street fronting units in section 10.1.2.(16)	Policy is intended to require higher density built forms (beyond townhouses) on large parcels
			- Suggested including "long-term affordability" in section 10.1.2.(18) to promote sustainability.	Connection to long-term affordability and sustainability is not clear
			- Suggested including option for additional compensation by City regulation in sections 10.1.2.(21) & (23)	New city regulations related to rental housing beyond the scope of the OP review
			- Asked if sections 10.1.2.(29) & 10.1.3.(2) would permit a variety store in Vista Hills	Policies could allow subject to zoning considerations and specific site characteristics
			- Supported consideration of Township planning in section 10.2.1.(15).(b)	Noted
			- Requested addition of health care facilities in addition to food stores in section 10.2.2.1	These uses are already included in the list of permitted uses
			- Asked why retail and commercial uses are only permitted on first storey in section 10.2.2.1.(5).(a)	In mixed use buildings, retail and commercial are directed to ground floor to animate the street. Policy ensures "active uses" are directed to the ground floor.
			- Expressed concern that neighbourhoods lack "Mixed-Use Community" lands	Policies have been updated to date to allow more and smaller food stores in more locations increasing access to different neighbourhoods.
			- Highlighted typo of "amount to commercial" in section 10.2.2.3	Noted and corrected
			- Asked what accommodation uses means in section 10.2.2.3.(3).(e)	Short term accommodation such as hotels
			- Asked what active uses means in section 10.2.2.3.(6)	Any combination of ground floor commercial, restaurant and retail uses, community uses, office uses and/or personal service uses - uses that activate the street, uses where people enter from the street
			- Questioned why department stores are prohibited in Corridor Commercial Designation	Department stores are directed to larger commercial areas such as the west side mixed use commercial area, Conestoga Commercial Centre, etc.
			- Highlighted typo of "dlimit" in section 10.2.2.6.(5)	Noted

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Discussed difficulty in enforcing section 10.2.2.6.(11), adverse impacts on mixed-use centres	Policy has been removed
			- Asked what "convertible frontage" and "active uses at ground level" mean in section 10.2.4.(1).(g)	Convertible frontage means a portion of a buildings that is designed to be flexible to allow for different uses in the future - easily converted to a different use. Active uses mean uses with access along the ground floor.
			- Supported policies calling for intensification of employment lands	Noted
			- Asked why large scale greenhouses are excluded in section 10.3.3.1.(3).(b)	Large scale greenhouses are better suited to rural areas as they can be land intensive.
			- Highlighted duplication in section 10.3.3.1.(8)	Formatting issue - resolved
			- Asked what a nanobrewery was in section 10.3.3.2.(5).(g)	A very small scale brewery with limited production capacity
			- Expressed desire for in-person discussion on Major Institutional - Academic designation for UW	Additional information and contact provided by separate correspondence
			- Asked where Schedule A6 can be found	Schedule A6 has been removed and replaced with an Appendix Map. ASPs now have a reference map alongside the policies
			- Asked what "transportation services" meant in section 10.5.(5).(f)	A defined term in the ZBL - a commercial establishment which provides transportation services for goods and or passengers using vehicles
			- Noted that it was impossible to differentiate between Significant Valleys and Supporting Natural Features on Schedule A4	Noted
			- Suggested stronger language on creating naturalization policy in section 10.6.1.(8)	Noted, to be considered during review of Chapter 8
			- Asked where Schedule I can be found	Schedule not part of Phase 1 review - Schedule is on City Website
			- Asked if ASPs stay as part of OP indefinitely, even if they are no longer relevant (ASP 6 & 38)	ASP to be further reviewed and updated in later Phases of the OPR
			- Asked what it means for ASP 63 to be "in progress"	ASP has been withdrawn
			- Asked where Schedule C can be found	Schedule not part of Phase 1 review Schedule is on City Website
			- Asked if district plans remain indefinitely and if there is a process to change them	District Plans are amended from time to time
Trevor Hawkins (MHBC)	52-56 Regina Street North, 33 Young Street East, & 34 Bridgeport Road East	27-Sep-24	- Noted that 52-56 Regina & 33 Young were permitted up to 6 storeys and that 34 Bridgeport was permitted up to 12 storeys.	Site-specific requests will be considered through Phase 2, subject to additional information being received. A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Noted that City-owned lands at 18-28 Bridgeport & 50 Regina are permitted 30 storeys	Site-specific requests will be considered through Phase 2, subject to additional information being received. A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Noted that OP permitted up to 30 storey heights south of Bridgeport Road	Site-specific requests will be considered through Phase 2, subject to additional information being received. A consultant retained to review height and density policies; this matter is currently under active consideration.- Site-specific requests will be considered through phase 2, subject to additional information being received. A consultant was retained to review height and density policies, the matter is currently under active consideration.
			- Requested that maximum heights for 52 Regina and 34 Bridgeport be increased to 30 storeys	Site-specific requests will be considered through Phase 2, subject to additional information being received. A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Highlighted that high rise development already permitted in area and existing 30 storey parcels are not large enough to accommodate redevelopment.	Site-specific requests will be considered through Phase 2, subject to additional information being received. A consultant retained to review height and density policies; this matter is currently under active consideration.

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Heather Price & Richard Kelly-Ruetz (GSP Group)	Atrium Waterloo (Erb Street West & King Street South)	30-Sep-24	- Suggested that it might be appropriate to defer redesignation of entire site alongside the portions being deferred for the Laurel/Clair SPA	Noted
			- Suggested that increased height permissions be considered for site, as it is located along the LRT alignment.	A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Suggested that sections 10.1.1.(12)-(15) should not be located in the residential designation policies, as they apply to other designations as well.	Noted and updated
			- Asked whether sections 10.1.1.(12)-(15) allow for height increases without OPA	No
			- Expressed concern with policies mentioning community benefits for height and similarities to previous section 37 bonusing.	Policy has been revised and clarified. Reference to 'community benefit' has been removed
			- Suggested that section 10.1.1.(15) would present conformity issue w/senior government	Noted
			- Suggested that language surrounding urban design policies were overly prescriptive	Urban Design policies have been amended
			- Asked if the City intended to trigger OPA if urban design policies were not met.	Urban Design policies have been amended
Heather Price & Mike Witmer (GSP Group)	194 Erb Street West, 17 Dietz Avenue North, & 50 Westmount Road North	30-Sep-24	- Suggested that sections 10.1.1.(12)-(15) should not be located in the residential designation policies, as they apply to other designations as well.	We appreciate this feedback, staff agree and policy section has been moved.
			Separate parcels have been merged in title, requested to consolidate split designation	Entire site is already a major node, refined split designation
			- Made commitment to work within 30-storey height limit if applied to entire property.	Noted
			- Requested that required Commercial GLFA be reduced from 30,406 square metres required under proposed policies to 5,000 square metres for this site.	Site is subject to active OPA/ZBA application, land uses will be determined and refined through that process. Overall GLFA requirements have been reduced for the designation. Commercial planned function to remain at the neighbourhood or community level, based on further analysis.
			- Stated that 2022 CEAPR encouraged City to provide more flexibility to retail sector	Commercial designations have been streamlined to add flexibility for commercial uses. Minimums have been reduced or removed in many designations.
			- Suggested that phasing policies in section 3.10.5.(4) could lead to worse outcomes by requiring that uses and amenities be brought forward in piecemeal, phase by phase, way.	Policy has been refined to encourage the development of a phasing strategy rather than the OP dictating phasing order.
Trevor Hawkins (MHBC)	325 Northfield Drive East & 0 Labrador Drive	01-Oct-24	- Requested that lands be redesignated from "Business Employment" to "Flexible Industrial" to permit more traditional employment uses.	The employment framework has been updated in light of PPS, 2024 and land use schedules have also been updated accordingly.
Trevor Hawkins (MHBC)	6-14 Dietz Avenue North	01-Oct-24	- Sought to ensure that the changes approved by OPA 48 were reflected in the new OP	Noted and corrected
Trevor Hawkins (MHBC)	410 Albert Street	04-Oct-24	- Highlighted that market conditions have changed since 2012 to favour warehousing and distributions as opposed to the offices permitted in the Business Employment designation	Noted, Business Employment uses have been refined in light of PPS, 2024
			- Requested that "Small Scale Warehouse" be added as a permitted use for the Business Employment designation.	Use will be permitted in this designation as per the latest draft

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Trevor Hawkins (MHBC)	103-105 Erb Street West & 8 Menno Street	07-Oct-24	- Noted that height permissions and node boundaries in this area have not changed since City introduced Official Plan.	Site-specific requests will be considered through Phase 2, subject to additional information being received
			- Requested that height permissions be increased to 12 storeys for 103-105 Erb	Site-specific requests will be considered through Phase 2, subject to additional information being received
			- Requested that 8 Menno be redesignated to Uptown Commercial Core and permitted up to 6 storeys.	Site-specific requests will be considered through Phase 2, subject to additional information being received
			- Requested that 8 Menno be included in the primary node	Site-specific requests will be considered through Phase 2, subject to additional information being received
			- Requested that 8 Menno be removed from the Menno-Euclid CHL	Site-specific requests will be considered through Phase 2, subject to additional information being received
			- Suggested that City reconsider bedrooms per hectare model of density regulation.	A consultant retained to review height and density policies; this matter is currently under active consideration.
Joseph Puopolo (Build Urban)	General (City-wide)	21-Oct-24	- Expressed opinion that OP was overly detailed and unnecessarily restrictive	A component of the OP review included streamlining and refining policies
			- Suggested that current approach to OP is promotes OPAs and bureaucratic red tape.	Updated OP have increased flexibility and clarity
			- Suggested opinion that level of detail contained in urban design policies would create excessive restrictions for development industry.	Urban Design policies have been amended – provide broad direction and detailed directed to Urban Desing Manual
			- Suggested that certain policies such as height, density, building floorplate, etc. would be better addressed through Zoning By-law.	Density requirements removed from the OP and directed to Zoning. OP does not have policies for floorplate size etc. Where warranted, many details have been referred to Zoning
Trevor Hawkins (MHBC)	121-125 Erb Street West & 10 Avondale Avenue South	23-Oct-24	- Noted that the City's height framework has not meaningfully changed, with only small height increases proposed.	A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Requested that maximum height permissions along Erb Street be increased to 12 storeys.	A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Suggested that retaining 6 storey permissions for 10 Avondale would allow for appropriate transition to low-rise neighbourhood	
			- Suggested that City reconsider bedrooms per hectare model of density regulation.	Will be further considered for the implementing Zoning By-law review, this density measure removed from Chapter 3 for the OP
Trevor Hawkins (MHBC)	122 Erb Street West & 10 Avondale Avenue North	23-Oct-24	- Noted that the City's height framework has not meaningfully changed, with only small height increases proposed.	A consultant retained to review height and density policies; this matter is currently under active consideration.
			- Requested that maximum height permissions along Erb Street be increased to 12 storeys.	
			- Noted that the boundary of the Primary node jogs irregularly to exclude 10-20 Avondale Ave N	Noted, further refinement of the Node boundary can be reviewed as part of Phae 2
			- Requested that 10 Avondale Ave N be included in the Primary Node	
			- Requested that 10 Avondale Ave N be designated Medium High Rise, 12 Storeys	A consultant retained to review height and density policies; this matter is currently under active consideration.

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Suggested that City reconsider bedrooms per hectare model of density regulation.	Will be further considered for the implementing Zoning By-law review, this density measure removed from Chapter 3 for the OP
Trevor Hawkins (MHBC)	183 Erb Street West & 6 Dietz Avenue South	23-Oct-24	- Suggested that Erb Street east of Westmount Road be identified as a Major Corridor as opposed to a Minor Corridor, as they are located within MTSA	Further refinement of corridors could be reviewed in Phase 2
			- Suggested the establishment of a 9 storey height category to transition from the 12 storey permissions in the Primary Node to the 6 storey permissions in the Minor Corridor.	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Requested that these properties be designated "Medium Rise, 9 Storeys"	Further refinement of corridors could be reviewed in Phase 2
			- Suggested that City reconsider bedrooms per hectare model of density regulation.	Will be further considered for the implementing Zoning By-law review, this density measure removed from Chapter 3 for the OP
Trevor Hawkins (MHBC)	190 Erb Street West & 4 Dietz Avenue South	24-Oct-24	- Suggested that Erb Street east of Westmount Road be identified as a Major Corridor as opposed to a Minor Corridor, as they are located within MTSA	Further refinement of corridors could be reviewed in Phase 2
			- Suggested the establishment of a 9 storey height category to transition from the 12 storey permissions in the Primary Node to the 6 storey permissions in the Minor Corridor.	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Requested that these properties be designated "Medium Rise, 9 Storeys"	
			- Suggested that City reconsider bedrooms per hectare model of density regulation.	A consultant retained to review height and density policies; this matter is currently under active consideration
Trevor Hawkins (MHBC)	112 Westmount Road South	25-Oct-24	- Requested that Minor Neighbourhood Corridor for Westmount Rd S be extended south to include subject property.	Review and refinement of the new Minor Neighbourhood Corridor occurred since June and corridor was extended further south – does include the subject site.
			- Supported Low Rise Residential designation and potential for missing middle housing.	Noted
Andrea Sinclair (MHBC)	210 Regina Street North	30-Oct-24	- Supported removal of the "Mixed-Use Office Commercial" designation.	Noted
			- Expressed concern with "Corridor Commercial" designation of property and considered "Corridor Commercial" designation a "downward designation" because it does not allow residential uses.	Site needed to be redesigned given the removed "Mixed Use Office". Upon further review, staff noted surrounding sites are designated "Mixed Use Community" and the site is within a node. Subject lands updated to be designated as "Mixed Use Community"
			- Requested to be designated "Mixed-Use Community"	
Andrea Sinclair (MHBC)	15, 23-25, 24, 35, 50-54, 85, & 89-91 King Street North & 124-134 King Street South	30-Oct-24	- Supported removal of maximum density regulations from OP	Noted
			- Asked for clarification on whether the boundaries of the Uptown MTSA's are to be included in Schedule J or reflected in Schedule B	Schedule 'J' is to be deleted. MTSA boundaries are identified on Schedule 'B'. Schedules 'J1'-'J5' to remain
			- Suggested increasing height limits along King Street in Uptown beyond 5 storeys	A consultant retained to review height and density policies; this matter is currently under active consideration

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Suggested that an 8-storey height limit is appropriate along King Street to accommodate required intensification.	
Andrea Sinclair (MHBC)	3 Regina Street North & 12 Dupont Street West	30-Oct-24	- Supported removal of maximum density regulations from OP	Noted
			- Supported increased height limit of 30 storeys for these properties	Noted
			- Expressed support for further height increases beyond 30 storeys	A consultant retained to review height and density policies; this matter is currently under active consideration
Andrea Sinclair (MHBC)	2 King Street North	30-Oct-24	- Supported removal of maximum density regulations from OP	Noted
			- Asked for clarification on whether the boundaries of the Uptown MTSA are to be included in Schedule J or reflected in Schedule B	Schedule 'J' is to be deleted. MTSA boundaries are identified on Schedule 'B'. Schedules 'J1'-'J5' to remain
			- Suggested increasing height limits along King Street in Uptown beyond 5 storeys	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Suggested that an 8-storey height limit is appropriate along King Street to accommodate required intensification.	
			- Support increased height limit of 30 storeys for east half of the property.	Noted
Andrea Sinclair (MHBC)	210-220, 247, 253, 255, & 258 King Street North, 298 Spruce Street, 9 Hickory Street West, & 265 Regina Street North	30-Oct-24	- Supported removal of maximum density regulations from OP	Noted
			- Supported increased height limit of 30 storeys for properties west of King Street.	Noted
			- Expressed support for further height increases beyond 30 storeys.	Noted
			- Requested that increased heights be considered across King & University node, not just within MTSA's.	A consultant retained to review height and density policies; this matter is currently under active consideration
Andrea Sinclair (MHBC)	460 Columbia Street West	30-Oct-24	- Requested that consideration be given to increased heights within all minor nodes.	A consultant retained to review height and density policies; this matter is currently under active consideration
			- Highlighted that existing site has potential for higher development.	
Andrea Sinclair (MHBC)	28 King Street North	30-Oct-24	- Supported removal of maximum density regulations from OP	Noted
			- Asked for clarification on whether the boundaries of the Uptown MTSA are to be included in Schedule J or reflected in Schedule B	Schedule 'J' is to be deleted. MTSA boundaries are identified on Schedule 'B'. Schedules 'J1'-'J5' to remain
			- Suggested increasing height limits along King Street in Uptown beyond 5 storeys	A consultant retained to review height and density policies; this matter is currently under active consideration

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Suggested that an 8-storey height limit is appropriate along King Street to accommodate required intensification.	
			- Supported increased height limit of 30 storeys for properties along Regina Street.	
			- Expressed support for further height increases beyond 30 storeys.	Noted
Jeff Henry (Arcadis)	249-253 Sunview St. (Lester -Sunview Development Inc.)	30-Oct-24	-Request that amendments be made to Area Specific Policy for the Northdale area to streamline development – to remove maximum densities from the Northdale ASP	The Northdale structure was originally based on a bonusing framework. Bonusing provisions have been removed, but density caps remain for the area. Further review and consideration is recommended for Phase 2, to evaluate overall density framework for Northdale
			-Noted that other jurisdictions have removed density maximum from the Zoning By-law	Could be further considered for the implementing Zoning By-law review
			Recommended modifying policies to enable a Minor Variance for an increase in density	Further review of Northdale framework could be explored as part of Phase 2

Appendix “C” Summary of Agency Comments and Responses

Commenter	Area of Comments	Date	Comments	How Comment Addressed
Melissa Larion (GRCA)	Natural Hazards (City-wide)	20-Aug-24	- Corrected duplication of word "ecological" in section 3.10.1.(5) on page 63	Noted and corrected
			- Recommended adding structural engineering letter/report as part of complete application requirements, as they are often requested for developments within the SPA	Noted and added
Jiajing Chen (Canacare on behalf of Infrastructure Ontario & Hydro One)	Hydro Corridors (City-wide)	30-Aug-24	- Requested more specific language around hydro infrastructure in "infrastructure" definition	To be updated as part of Phase 2
			- Asked that all references to "Hydro One" be "Hydro One Networks Inc."	Utilities and Infrastructure section to be updated as part of Phase 2 – no reference of Hydro one in Phase 1
			- Asked that transmission & distribution of electricity be referred to as "hydro corridors"	To be updated as part of Phase 2
			- Asked for use of term "electricity generation facilities and transmission and distribution systems"	To be updated as part of Phase 2
			- Requested addition of policy that encourages secondary uses of hydro corridors but recognizes primacy of electricity transmission	To be updated as part of Phase 2
			- Requested updating section 10.6.2.1.(12) to require consultation with Hydro One	
Jeremiah Johnston (MTO)	Transportation (Hwy. 85)	12-Sep-24	- Suggested updating 11.1.3.(60) to reference buried hydro only "where feasible"	
			- Recommended showing Province-Wide Cycling Network on Schedule F	Noted, to be updated in Phase 2
			- Suggested identifying MTO as road authority with jurisdiction over Highway 85	Noted, to be updated in Phase 2
			- Requested that Conestoga Parkway be relabeled as Highway 85	Noted and completed on land use Schedules
			- Suggested adding language about requirements for MTO permits where applicable	Noted, to be further reviewed as part of Phase 2
			- Suggested adding language that encourages early consultation with MTO where applicable	Noted, to be reviewed as part of Phase 2, MTO currently circulated on development applications
Brian Hill (City of Waterloo READI Team)	General	30-Aug-24	- Recommended that the City review MTO's guidelines for Municipal Official Plans	Noted
			- Stated that MTO is open to new ped./cyclist bridge over Highway 85 south of Northfield	Noted, to be further reviewed as part of Phase 2
			-Add the current land acknowledgement noted on Jostle	Noted and updated
			-update "Socially sustainable" to "Equitable or inclusive city" to avoid confusion with environmental sustainability.	Noted and updated
			-It is good to support steps towards Reconciliation but question its feasibility within the legislative planning process.	Noted and updated
John Lubczynski (Region of Waterloo)	General (City-wide)	23-Sep-24	-Under economic sustainability, include "affordable and accessible housing"	Noted and updated
			- "Complete communities" is not necessarily something that is true to people of all abilities, due to limitations in the Building Code and enforcement of guidelines that make it difficult to ensure that our communities are accessible to people with disabilities, particularly when we are considering older buildings that need to be retrofitted. More efforts to prioritize inclusion and accessibility within planning and this Official Plan might be helpful. Exploring ways to encourage social connectivity within high rise buildings should be encouraged, and access to key services like daycares	The Official Plan encourages neighbourhoods with a mix of uses and range of housing options. We have aligned our definition of 'Complete Communities' with the Regional Official Plan (2022) and PPS2024. Slight modifications to the 'Complete Communities' definition have been made to further prioritize inclusion. Efforts to prioritize social connectivity are addressed through other strategic initiatives including the Strategic Plan (2024-2027).
			- Expressed belief that OP Review broadly conforms with objectives of ROPA 6, but certain amendments could be made to bring it into closer alignment	Slight updates have been made to bring it into closer alignment
			- Suggested that Territorial Acknowledgement be moved to front of Chapter 1 instead of 1.3	Noted, and has been moved
			- Stated Chapter 1 may need to change to reflect future relationship between City and Region	Noted

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Suggested including concepts of "social equity" and "equity-deserving groups" in Chapter 2 to better align with ROP Section 1.2.1 and PPS, 2024 section 2.1.6	Wording has been updated
			- Noted that PPS2024 still requires municipalities to establish built-up area intensification targets and supported focus on intensification in Nodes, Corridors, and MTSAs.	Clarified density table in chapter 3
			- Suggested including the term "designated growth areas" to better align with PPS2024 and help implement greenfield density target	Noted, references to greenfield areas has been updated to designated growth areas as per PPS, 2024
			- Suggested integrating the definitions of "complete communities" and "15-minute neighbourhoods"	Definitions have been integrated, City maintains complete communities which incorporates aspects of 15-minute neighbourhoods.
			- Suggested reviewing policy language around employment conversions to ensure consistency	Noted and updated
			- Suggested that references to excluding non-permeant residents from population projections be reworded to only excluding students in conformity with the ROP.	Language has been updated and clarified
			- Suggested adding climate change to growth planning objectives in section 3.1.1.(d)	Wording has been updated
			- Suggested adding new objectives around climate action, indigenous culture, social equity, and prioritizing the voice of youth to align with section 2 of the ROP.	Some additional wording relating to climate action, indigenous culture, and social equity has been added
			- Suggested that more information on how intensification goals on p.23 will be achieved	Updated table to clarify how growth is measured across designated growth areas
			- Suggested defining the term "strategic growth areas" to align with PPS2024	Noted
			- Stated that lower height requirements may be needed for areas that could impact airport	To be reviewed through Phase 2
			- Requested opportunity to discuss how regional intensification corridor objectives were being met	Policy framework does not preclude Regional corridor priorities, transit is a priority for potential corridors such as King St. Additional consultation to occur during Phase 2 transportation review
			- Suggested that plan should clarify that Uptown Waterloo Primary Node is subject to 200 residents and jobs per hectare target.	Noted and clarified
			- Encouraged City to add greenfield development criteria in ROP sections 2.G.1.2, 2.G.1.3, 2.G.1.4, & 2.G.1.5	Targets for Designated Growth Area is consistent with ROP and table 3.1 notes it is to apply over the entire Designated Growth area. Policies also require development to achieve goals of complete communities consistent with ROP policy.
			- Suggested enhancing sustainable design criteria in section 3.10.5 with ROP section 2.B.1.2	Sustainable design to be further refined and revised, likely integrated with High Performance Development Standards.
			- Supported the establishment of a shared High-Performance Development standard across WR	Noted
			- Suggested that City review ARU policies in section 10.1.2.4 to align with Planning Act	Updates to OP have been made to implement Four Units, Four Storey initiative
			- Suggested reviewing section 10.1.6 to ensure compliance with ROP section 2.5.1	OP has policies to encourage missing middle housing. Updates to OP have been made to advance Four Units, Four Storey initiative
			- Expressed confusion at the large number of terms used to refer to employment areas in OP	Employment area policies have been refined and are in conformity with the PPS2024
Kristen Barisdale (GSP Group)	WRDSB & WCDSB (City-wide)	30-Sep-24	- Asked for clarity as to whether OP mapping reflects ROP Regional Employment Areas	ROP Employment areas are not consistent with PPS2024, so OP does not reflect them
			- Suggested that section 10.3.2.9 retail permissions did not align with PPS2024	Employment policy framework has been updated to ensure conformity with PPS2024
			- Highlighted discrepancy between section 10.3.2.11 and "area of employment" definition in Planning Act and date should be changed to October 20, 2024	Noted and updated
			- Recommended that City carefully review all glossary definitions for alignment with PPS2024	Noted
			- Requested that publicly-funded schools be a permitted use in all land use designations under OP	Permitted under "community use". Schools are not appropriate land uses in certain designations – e.g., Flexible Employment, natural heritage designations, etc.
			- Requested that section 1.4 be amended to specifically exclude provincially-funded school boards from compliance with the OP	Noted
			- Asked whether both elementary and secondary schools are considered under "community use"	Yes
			- Requested that "public school" be changed to "publicly-funded school" in community use definition.	Unnecessary. Stipulation applies equally to public and private schools

Commenter	Area of Comments	Date	Comments	How Comment Addressed
			- Sought clarification that "community uses" includes childcare centres operated by school boards	Yes. And private childcare.
			- Requested that City explore ZBL updates to allow community uses in base zoning framework	Noted, zoning amendments will follow the implementation of the OP
			- Asked for clarification if secondary schools are only permitted in "Major Institutional" designation	Is also permitted under "community use" (several designations) in addition to Major Institutional. The OP identifies existing secondary schools but does not preclude new ones.
			- Sought to ensure that OP policies will not impede combined elementary and secondary schools	OP policies would not impede a combined school site between boards.
			- Asked that policies regarding schools adjacency to arterials remain an encouragement	Noted. Changes are not proposed at this time
			- Supported section 10.6.2.1.(13) regarding cooperation over use of municipal park spaces	Noted

Appendix “D” - Minutes of Informal Public Meeting

September 23, 2024

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Council Meeting

- a) **Title:** **City of Waterloo Official Plan Review
(Phase 1), OPA No. 58**
 Prepared by: Ric Martins
 Ward No.: City-Wide

Ric Martins gave a presentation outlining phase one of the Official Plan Review, as well as the timeline for future phases. He responded to questions of Council.

Addison Milne-Price, Planner, Design Plan Services Inc. provided comments regarding Commercial and Mixed-Use Land Uses, and offered recommendations on specific lands. Joel Cotter and Ric Martins responded to questions of Council.

Sam Goncalves-Horton, VP Activism, Planning Students Association, UW NDP Club, Violeta Manastirliu, Planning Students Association and Manuela D’Cunha, Planning Students Association gave a presentation about the need for a reduction in parking minimums, and changes to the parking policies. They then responded to questions of Council. Ric Martins also responded to questions of Council.

Kae Elgie, Resident of Waterloo offered her comments on the Official Plan Review, from Greenhouse Gas emissions from traffic and possible contradictions in the goals for the Uptown Primary Node. She then responded to questions of Council. Ric Martins also responded to questions of Council.

Ashwin Annamalai, Resident of Waterloo spoke in support of the UW Planning Students Association in their request to remove parking minimums, and about the need for more Affordable Housing.

Phil Marfisi, Resident of Waterloo also spoke in support of the reduction of parking minimums, as well as the need for more flexibility in commercial use buildings in the suburbs.

As no one else was present to speak to the Official Plan Review, the Chair concluded the Statutory Public Meeting and indicated that staff will review the issues and report back to Council at a later date.