

# Planning Justification Report

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## 525 to 565 Conestogo Road West

Northfield Properties LP

City of Waterloo

Official Plan Amendment

Zoning By-law Amendment

Draft Plan of Subdivision

June 2021



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Official Plan Amendment  
Zoning By-law Amendment  
Draft Plan of Subdivision

City of Waterloo

June 2021

**Prepared for:**

Northfield Properties LP  
65 Northfield Drive West  
Waterloo, ON  
N2J 4J4

**Prepared by:**

GSP Group Inc.  
72 Victoria Street South, Suite 201  
Kitchener, Ontario  
N2G 4Y9



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# 1. Introduction

## 1.1 Background

GSP Group Inc. has been retained by Northfield Properties LP (the “Owner”) as the Planning Consultants for the property 525 to 565 Conestogo Road West, formerly owned by Kraus Flooring (the “Site”). The Site is 10.7 hectares in size and was formerly used by the Kraus Group of Companies as their international head office and manufacturing facilities, including Strudex Fibers (manufacturing fiber materials) and Kraus Carpets (manufacturing broadloom carpets). The Site is currently occupied by two buildings with a total gross floor area of approximately 81,000 m<sup>2</sup> and bisected by an existing hydro tower corridor, splitting the property into two-thirds north and one-third south of the corridor. The larger building north of the hydro corridor, municipally known as 565 Conestogo Road West, was previously occupied by the office and manufacturing uses. The smaller building south of the hydro corridor, municipally known as 525 Conestoga Road West, was previously used for warehouse purposes.

During the preparation of the new City of Waterloo Official Plan in 2012, the entire Site was “*DEFERRED*”, pending the preparation of a future Master Plan for the redevelopment of the Site, which would include a significant employment component. The deferral was endorsed by both City and Regional Councils anticipating the preparation of a Master Plan and the submission of future private land use planning applications.

In 2016 to 2017, the City of Waterloo initiated the Light Rail Transit (referred to a “LRT”) Station Area Planning exercise. During that process, the Owner submitted a future vision for the redevelopment of the Site contemplating a future mixed-use community. However, the City’s LRT Station Planning process was paused because of the new Growth Plan (July 1, 2017), wherein the Province would not allow employment land conversions without a Municipal Comprehensive Review. As a result, only a partial implementation of the LRT Station Planning process was applied. The northerly one-third of the Site remained “*DEFERRED*” in the Official Plan.

The majority of the Site is currently designated for business employment purposes. The Site is located within 800 metres of both the Conestoga iON Station Area and Northfield iON Station Area and therefore considered within a major transit station intensification area, which is intended to accommodate a mix of medium and high density residential, commercial and employment uses, in accordance with the existing Provincial, Region and City planning policy framework.

The Region of Waterloo initiated a comprehensive review of the Regional Official Plan in August 2018 (the “ROP Review”), which included a land needs assessment used to inform the designation of new and/or the conversion of existing employment lands as part of the Regional Official Plan and City of Waterloo Official Plan. As part of this review, Northfield Properties LP requested consideration be given to establishing permissions for non-employment uses along with employment uses for the Site. In response to this request, the Region recommended that that a portion of the Site be redesignated to permit non-employment uses while a portion of the Site remain as employment uses (Regional Report: PDL-CPL-21-16, April 20, 2021).

In accordance with the recommendations of Regional Report: PDL-CPL-21-16, Northfield Properties LP is proposing to redevelop the Site as a master-planned mixed-use community that will contain residential, employment, commercial, community and open space uses, providing for the intensification of an underutilized urban property. The proposed redevelopment scheme includes 8 future developments blocks connected by internal driveways, walkways, and courtyards. Future development of the property will include buildings ranging in size from 3- to 35 storeys atop an expansive underground parking structure combined with a surface parking facility. High-density residential uses with some at-grade commercial and retail uses will be provided on the northern portion of the Site with employment and office space opportunities provided on the southern portion of the property. The proposed redevelopment scheme includes a pedestrian promenade extending along the Conestoga Parkway frontage with a future pedestrian bridge providing a direct connection to the Northfield iON Station west of the parkway.

## **1.2 Proposed Applications**

Northfield Properties LP is submitting applications for Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision. These private applications are consistent with the recent recommendations of the Region related to employment land conversions and are intended to be considered in conjunction with the Municipal Comprehensive Review currently being completed by the Region.

The proposed Official Plan Amendment will redesignate the northern portion of the Site from Business Employment to Mixed-Use High Density Residential to permit residential, commercial and community uses along with site specific policy provisions to reflect the design intent and objectives of the proposed development. The southern portion of the Site will maintain the current Business Employment designation with site specific policy provisions to reflect the specifics of the proposed redevelopment.

The proposed Zoning By-law Amendment will rezone the Site accordingly to permit a mix of employment, residential, commercial and community uses with site specific zoning to reflect the details of the proposed development.

The Draft Plan of Subdivision will establish 8 future development blocks, allowing a phased approach to the development and construction of the Site and creating opportunities for the future sale and/or lease of blocks within the overall property.

A Pre-Consultation Meeting was held on January 20, 2020 with staff from the City of Waterloo, Region of Waterloo, Ministry of Transportation and Grand River Conservation Authority. A copy of the Pre-Consultation Meeting Record has been included as **Appendix A.**

### **1.3 Report Context and Structure**

This report has been prepared to provide planning justification in support of the applications for Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision and includes:

- A description of the site history, existing conditions, and context within the City of Waterloo and the immediately surrounding community;
- A summary of the proposed master development concept, including development population projections and phasing;
- A summary of the proposed planning applications;
- A summary of the findings and recommendations of all supporting studies and reports; and
- An analysis of the relevant provincial and municipal planning policies applicable to the proposed applications as the basis for planning justification, including policies related to employment land considerations.

## 2. Site Overview and Context

### 2.1 Site Location and Description

The Site is located on the north side of the City of Waterloo (the “City”), immediately north of the Conestoga Parkway (Highway 85). The Site has a total area of 10.7 hectares (26.4 acres) with 223.88 metres of frontage on Northfield Drive, approximately 560 metres of frontage on Conestogo Road and approximately 630 metres of frontage on Conestoga Parkway (the “Parkway”). The Site is generally bound by Northfield Drive to the north, Conesotgo Road to the east, existing employment uses to the south, and Conestoga Parkway to the west (**Figure 1**). The Site is legally described as Part of Lot 8, German Company Tract, Parts 1, 2, 3, 4, 5 & 6, 5R-4092, Save and Except Part 7 on WR811662 and Part 6 on WR838581, and municipally known as 525 and 565 Conestoga Road.

### 2.2 Existing Site Overview

The Site is one of the largest and most prominent redevelopment opportunities in the Region of Waterloo (“Region”). It is currently occupied by two existing buildings with an overall total gross floor area of approximately 81,000 m<sup>2</sup> (approximately 872,000 ft<sup>2</sup>) with the two buildings on the property separated by a 45.72 metre-wide servicing corridor for Waterloo North Hydro (“WNH Corridor”).



Existing site

The north portion of the property at 565 Conestogo Road (Building A) contains an existing one to 4-storey building previously used for manufacturing, warehousing, distribution, and administrative offices along with surrounding surface vehicular and truck parking facilities and shipping/receiving facilities. The lower level of Building A was constructed in the early to mid-1960s with a number of additions between the early 1970's and late 1990's. Building A has several driveway access points to Conestogo Road with no direct driveway connections to Northfield Drive.



Building A, Northfield Drive frontage



Building A, Northfield Drive frontage



Building A, Administrative Offices

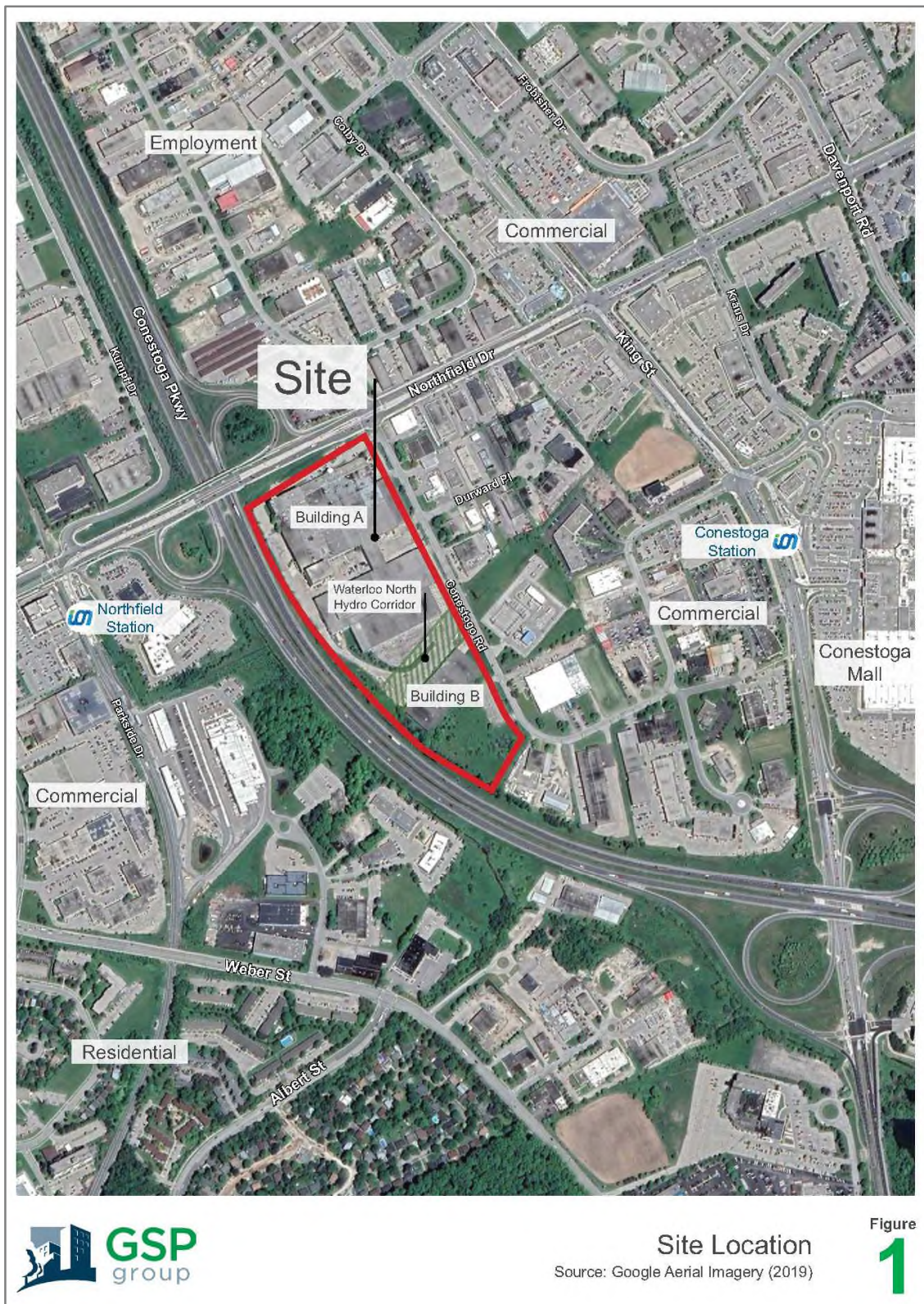


Building A, Warehouse and Distribution

The south portion of the property at 525 Conestogo Road (Building B) contains an existing, smaller single-storey metal clad building previously used for warehousing and distribution along with truck shipping/receiving facilities and a surface vehicular parking lot. Building B was constructed in the early 1990's and had one driveway access to the building and two driveway access points to an existing surface parking facility located to the south of the building.



Building B



The topography of the Site generally falls from northeast to southwest, towards an existing watercourse along the southwestern boundary of the property. The existing Northfield Drive right-of-way is approximately 2 to 5 metres higher than the Site whereas Conestogo Road is generally at the same elevation.

The southwestern portion of the Site, which contains a small water course associated with Forwell Creek, is regulated by the Grand River Conservation Authority (“GRCA”). The water course drains from the west side of the Parkway (under the right of way) via a culvert that terminates at the edge of the Site. The water course then drains south, parallel to the Parkway. Both the floodplain and ecology of this feature were evaluated as a part of this submission. There are existing mature trees and vegetation located in the vicinity of the watercourse. In addition, there are existing mature trees and landscaped areas at the principal building entrances and around the perimeter.

The following municipal and utility service connections currently exist on the Site:

- Local 300-mm-diameter watermain on Northfield Drive and Conestogo Road with multiple connections to the existing buildings/structures;
- A 200-mm to 300-mm-diameter sanitary sewer on Conestogo Road with the existing sewer crossing the hydro corridor and providing multiple connections to the existing buildings/structures;
- A 300-mm-diameter storm sewer on Conestogo Road and an existing 900-mm-diameter storm sewer within hydro corridor;
- A 250-mm-diameter steel gas main on the south side of Northfield Drive with additional gas services provided on either side of the hydro corridor via a 100-mm-diameter steel gas main on Conestogo Road;
- Telecommunication services provided along Northfield Drive and Conestogo Road; and
- Waterloo North Hydro transformer station on Conestogo Road directly opposite the Site providing both above- and below-grade hydro service connections.

## 2.3 Site Context

The Site has a prominent location in proximity to an interchange with the Parkway, centrally located between two iON Rapid Transit Stations and along the Northfield Drive arterial road (**Figure 2**). The Site is located on the south side of Northfield Drive and east of the Parkway with connections to the Conestoga Parkway provided via the Northfield Drive interchange and the King Street North interchange (approximately 1 km north of the Site).



The Site is situated within both the Northfield and Conestoga iON Station Areas, which are intended to provide for a large portion of the City's future intensification and redevelopment opportunities. The Site is located approximately 300 metres west of the Northfield iON Station, which can be accessed along Northfield Drive. The Site is also located approximately 650 metres west of the Conestoga iON Station, which can be accessed by existing pedestrian facilities on Conestogo Road, through the hydro corridor or via existing Grand River Transit (GRT) local bus service on Northfield Drive to King Street North. Local GRT Route 9 is located along the Northfield Drive frontage of the Site, providing direct connections to the Conestoga Mall GRT Station and further connections to several City- and Region-wide GRT Routes, including iXpress Routes 201 and 202.

Northfield Drive is the most northerly arterial road that connects the east and west sides of the City over the Parkway and plays an essential role in promoting connectivity and the movement of people through transit ridership and automobile across the City. However, the existing Parkway overpass does not provide an ideal connection for pedestrians and cyclists due to the existing Parkway ramps, the LRT tracks, and restricted vehicular movements.

The Site is immediately surrounded by existing low-rise employment uses to the east, between Conestogo Road and King Street North. Many of these properties are small with limited opportunities for intensification. There is a mix of existing commercial and light-industrial uses along Northfield Drive to the east and west of the Site; these properties are also small in size with fragmented ownership, providing little opportunity for consolidation and intensification.

From a broader community perspective, the Site is located approximately 650 metres west of a range and mix of existing commercial and retail uses at the intersection of Northfield Drive and King Street North, including Conestoga Mall. The Site is also located approximately 850 metres east of a mix of convenience and neighbourhood commercial uses at the intersection of Northfield Drive and Weber Street North, including but not limited to food stores, restaurants, personal services, and financial institutions.

The Site is proximate to three existing low-rise residential neighbourhoods (**Figure 2**). Lakeshore District and Lakeshore North District are located approximately 850 metres west of the Site. These Districts are predominated by low-density residential uses. The Lakeshore District neighbourhood includes parks, schools and community uses, including Northfield Park, Sunnydale Gardens, Sir Edgar Bauer Catholic Elementary School, Cedar Brea Public School, Albert McCormick Area and Waterloo Public Library Branch and Sunnydale Community Centre. The Lakeshore North neighbourhood includes Lakeshore

Optimist Park, Pinebrook Park and Northlake Woods Public School. Both Districts also have several places of worship and religious institutions.

Lincoln District is located approximately 1.5 km west of the Site on the west side of Conestoga Mall. The Lincoln District neighbourhood contains several parks and community services, including Kingscourt Park, Bluestream Park, Anndale Park and KidsAbility. The Lincoln District also contains several places of worship.

## 3. Proposed Development

### 3.1 Development Intent

Northfield Properties LP is proposing a compact, high-density, mixed-use redevelopment of the Site. It will be a mixed-use neighbourhood that will include a range of mid and high-rise housing options, street-fronting retail spaces, office employment and commercial uses in prominent locations and a network of connected open space and amenity areas. The attached Demonstration Plan (**Figure 3**) illustrates a mix of residential, office, commercial, community and open space, with residential uses concentrated on the north portion of the Site (north of the WNH Corridor) and employment uses concentrated on the south portion of the Site (south of the MNH Corridor). Private streets in a modified grid pattern provides for an integrated, regular rhythm of buildings with public, pedestrian corridors, courtyards, and usable open spaces. Multi-unit residential, mixed-use buildings and employment buildings will range in height from 3 to 35-storeys, generally cascading down from the intersection of the Parkway and Northfield Drive southerly, with the lowest future building heights associated with the employment uses identified in the southerly third of the Site.

A limited amount of retail and commercial ground floor uses will be oriented towards the internal Conestoga Road as well as the internal street pattern with a network of internal parks, amenity spaces and promenade accessible to residents and the broader community. Office and employment uses will be concentrated at the southern end of the Site with visibility from Conestoga Parkway and Conestoga Road. The Demonstration Plan contemplates approximately 18,216.00 m<sup>2</sup> (196,081.8 ft<sup>2</sup>) of total gross office floor area, 1,988.0 m<sup>2</sup> (21,399.4 ft<sup>2</sup>) of total commercial gross floor area and a total of 2,534 residential dwelling units.

Buildings associated with Blocks 4 and 5 will orient retail and commercial uses towards Conestoga Road and the private internal driveway (Streets A, B and C), animating the public and private streetscape with principal entrances and patios. Private driveways will extend internal to the Site with building entrances, amenity spaces and some residential units oriented towards internal parks and courtyards, creating an accessible and vibrant public realm that will accommodate walking and cycling. In addition to the internal courtyards and amenity space network, the Demonstration Plan includes an expansive promenade along the western edge of the Site with a future pedestrian connection to the Northfield iON Station located on the west side of the Parkway.

Parking will be provided in the form of underground and structured parking facilities distributed across the northern portion of the Site with a surface parking facility proposed at the southern end of the Site for future office and employment uses (**Figures 4 to 4C**).

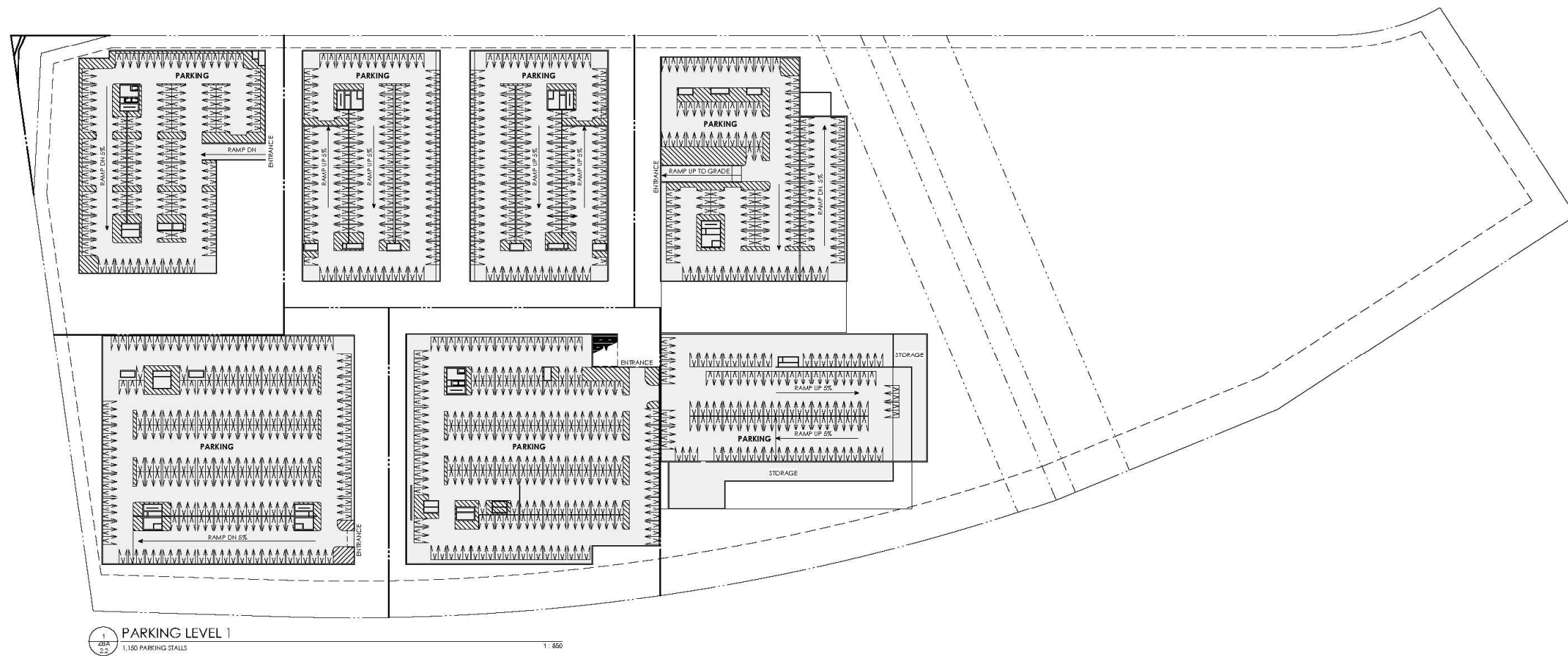
Residential parking has been provided underground or within the podiums of future buildings with minimal short-term surface parking proposed; underground parking has been avoided under the internal private road network to ensure no challenges in the future phasing of construction and/or registration of the development. All office and employment parking will be provided as part of a surface parking lot

**Figure 5** schematically illustrates the pedestrian overpass across the Parkway, creating significant opportunities for LRT ridership generated through the redevelopment. This overpass connection spans the Parkway to avoid conflicts with either existing or future Ministry of Transportation (the “MTO”) plans, contemplates the change in grade east and west of the Parkway, and utilizes Region lands and lands under easement by the City to access the Northfield Station. A partnership between the MTO and municipalities will be required to accomplish this important connection. Ultimately, it is anticipated that daily iON LRT ridership from the future population from this new neighbourhood could be over 3,500 trips per day.

The redevelopment of the Site will create a distinct destination neighbourhood responsive to the current market demands for integrated communities, establishing a transit-oriented community and providing a rich urban environment to live, work and play.

Note that the Demonstration Plan has been prepared to articulate the current design vision and intent of Northfield Properties LP for the overall redevelopment of the Site and is subject to future refinements and adjustments based on local and Regional market considerations as well the objectives of the future developer(s).

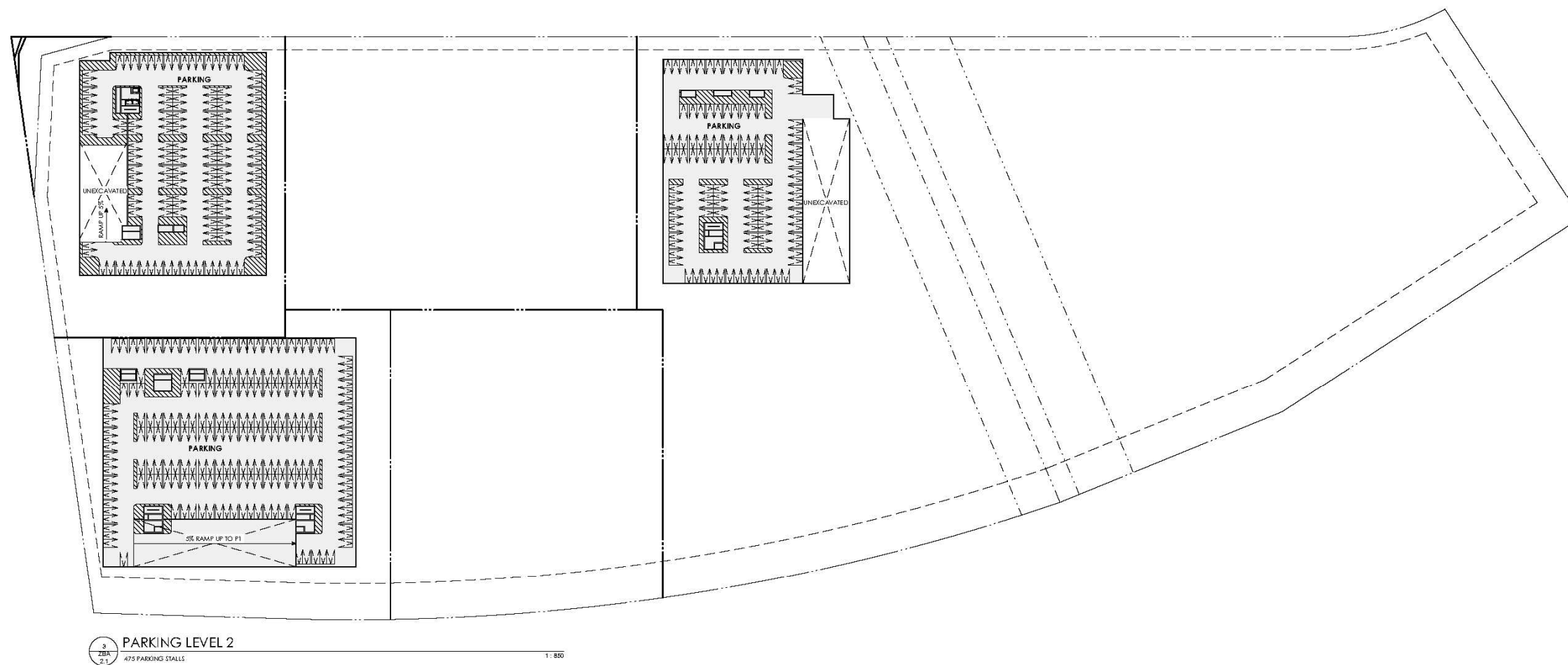




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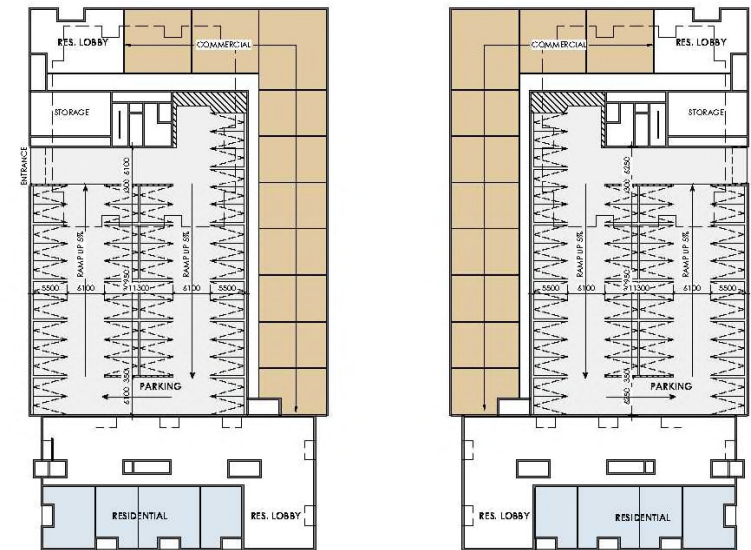
Underground & Structured Parking  
Source: ABA Architects Inc. (March 26, 2021)

Figure  
**4**

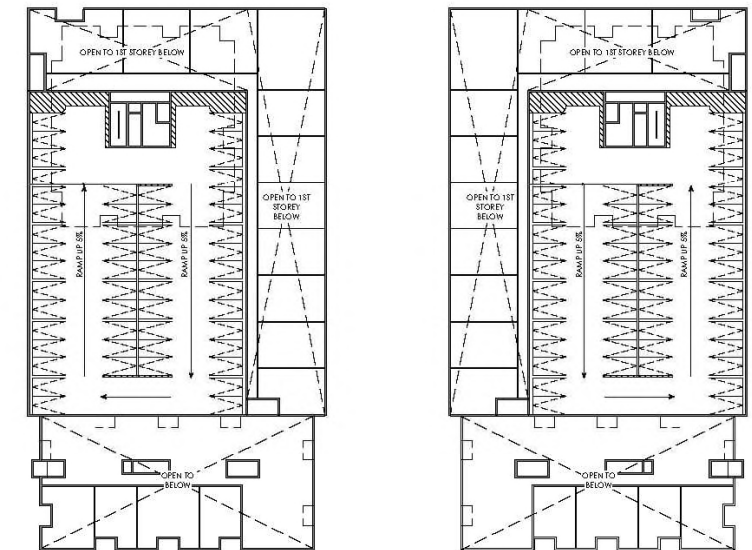


Underground & Structured Parking  
Source: ABA Architects Inc. (March 26, 2021)

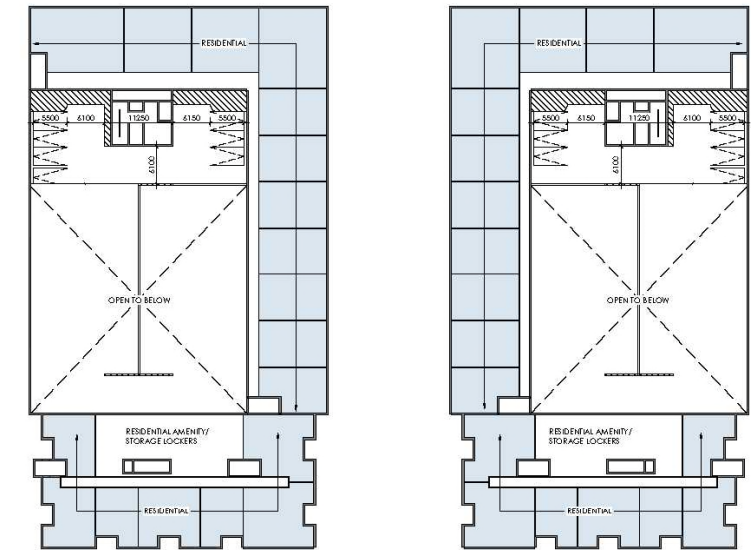
Figure  
**4a**



2 BLOCK 4/5 L1  
96 PARKING STALLS  
1:450



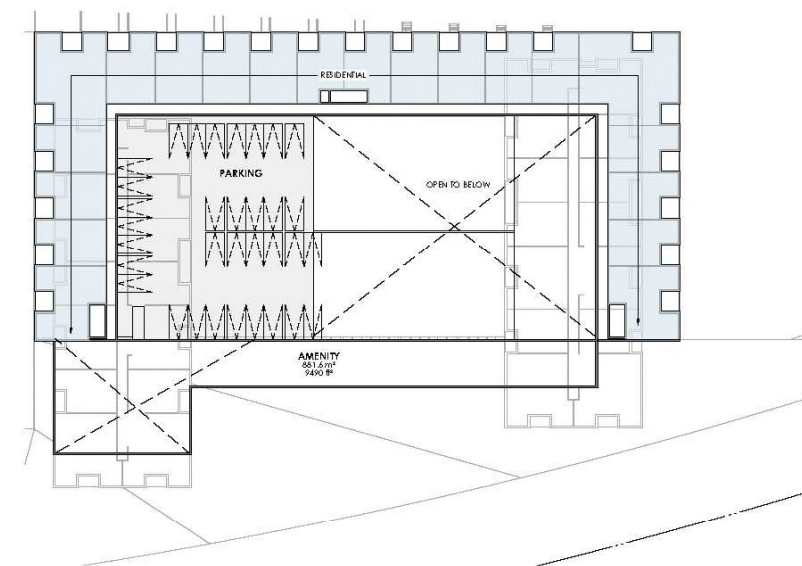
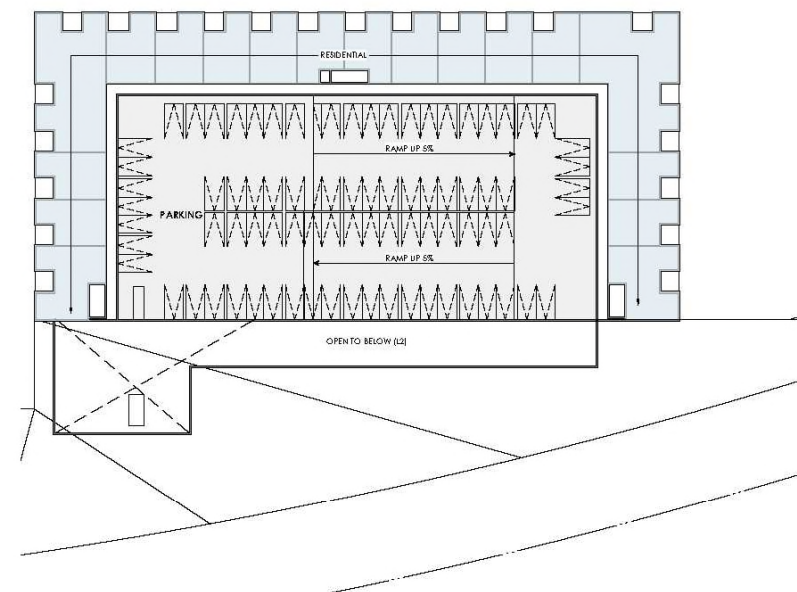
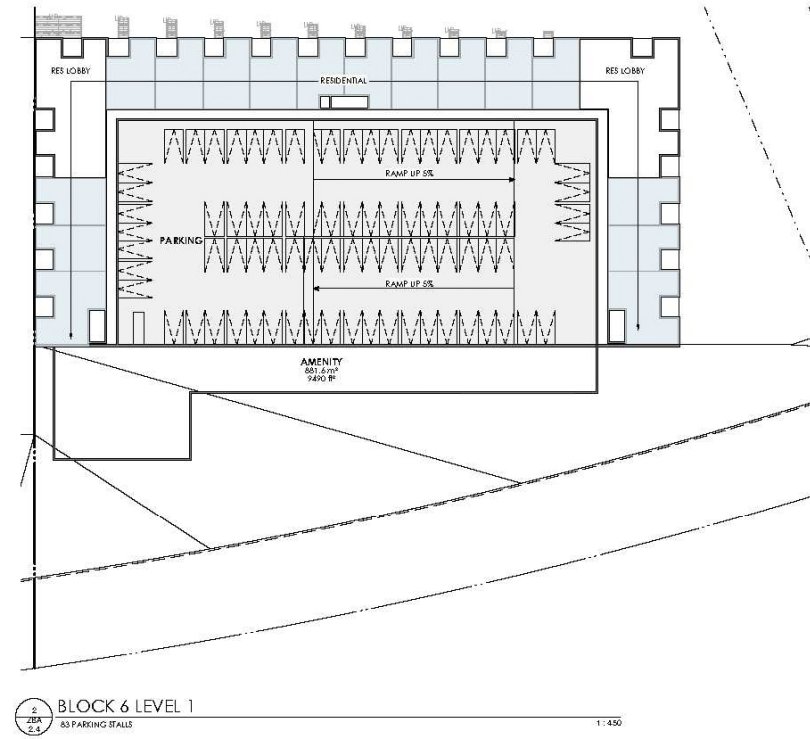
1 BLOCK 4/5 L2  
104 PARKING STALLS  
1:450



3 BLOCK 4/5 L3  
14 PARKING STALLS  
1:450

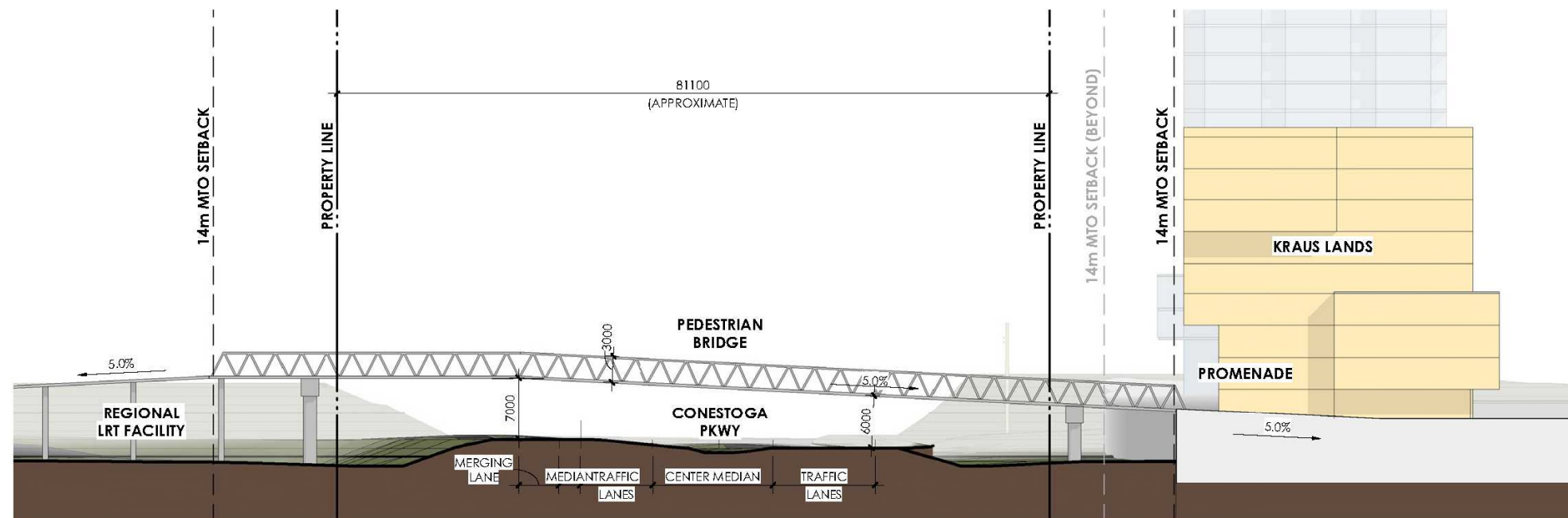


Figure  
Underground & Structured Parking  
Source: ABAArchitects Inc. (March 26, 2021) **4b**



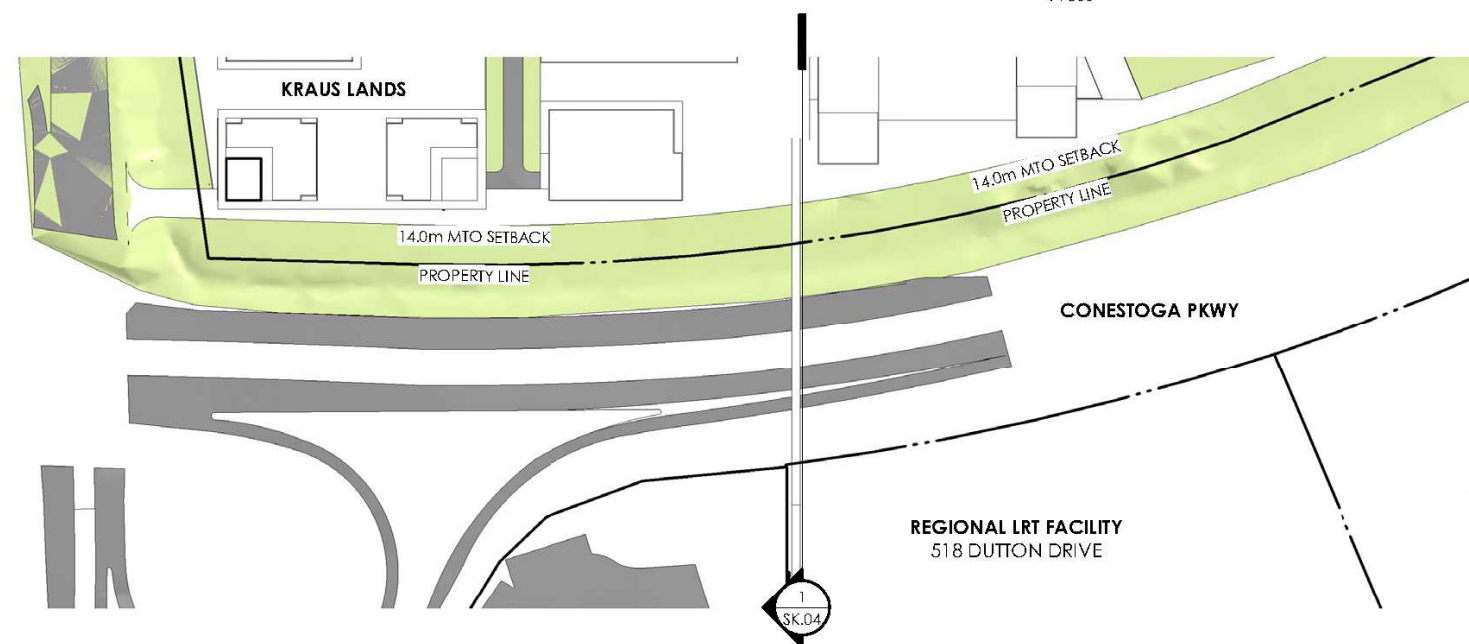
Underground & Structured Parking  
Source: ABA Architects Inc. (June 30, 2020)

Figure  
**4c**



1 SECTION SKETCH  
SK.04

1 : 500



2 SITE PLAN SKETCH  
SK.04

1 : 2000



Pedestrian Overpass  
Source: ABA Architects Inc. (March 26, 2021)

Figure  
**5**

### 3.2 Development Master Plan and Phasing

The Master Plan identifies a total of 15 future buildings, ranging in size from 3-storeys to a maximum of 35-storeys and spread over a total of 8 future development blocks (refer to **Figure 3**). The following provides a summary of each of the future development blocks:

**Table 3: Development Master Plan**

| Block No. | Total GFA (m <sup>2</sup> )<br>* | Office GFA (m <sup>2</sup> ) | Commercial GFA (m <sup>2</sup> ) | Residential GFA (m <sup>2</sup> ) | Podium GFA (m <sup>2</sup> ) | Residential Units | Parking** |
|-----------|----------------------------------|------------------------------|----------------------------------|-----------------------------------|------------------------------|-------------------|-----------|
| 1         | 66,793.6                         | --                           | --                               | 58,184                            | 8,608.6                      | 567               | 460       |
| 2         | 41,560.5                         | --                           | --                               | 36,223                            | 5,337.5                      | 350               | 281       |
| 3         | 42,569                           | --                           | --                               | 34,369                            | 8,200                        | 355               | 229       |
| 4         | 32,174                           | --                           | 994                              | 26,765.6                          | 4,414.4                      | 292               | 490       |
| 5         | 29,759                           | --                           | 994                              | 24,350.6                          | 4,414.4                      | 270               |           |
| 6         | 52,130.2                         | --                           | --                               | 52,130.2                          | 36,847.2                     | 384               | 404       |
| 7         | 31,588                           | --                           | --                               | 31,588                            | 21,726                       | 316               | 255       |
| 8         | 18,216                           | 18,216                       | --                               | --                                | --                           | --                | 511       |

\* Including podium parking but not underground parking

\*\* Plus 18 short-term surface parking spaces

Details pertaining to each Development Block, including the number and size of buildings, mix and location of uses, vehicular and pedestrian access points, access to parking, and landscape and common amenity areas is contained in the Master Plan & Design Guidelines Report prepared by GSP Group and submitted in support of the proposed development.

While the overall phasing of development and details of construction have yet to be finalized, the Master Plan will likely be implemented and constructed in multiple phases with Block 1 (northwest corner of the Site) being the first phase of development and construction. It is anticipated that further phasing will capitalize on the prominent frontage along the Parkway with Block 3 and 6 moving southerly following the construction of Block 1. The phasing of the balance of the Master Plan will include those Blocks with frontage along Conestogo Road (Blocks 2, 4, 5 and 7), along with or followed by the implementation and construction of Block 8. This anticipated phasing is subject to change, based on future ownership of the Site as well as local, Regional and national residential, office and commercial market trends and demands. While the overall mix and location of residential, office and commercial uses will generally remain the same, the timing and phasing of the development may be refined as part of future detailed design.

### 3.3 Development Statistics and Projections

The overall development statistics are provided on a block-by-block basis. The redevelopment is anticipated to yield an employment population for office and retail spaces as well as work from home of 759.78 jobs, plus a total of 2,534 residential units with a projected population of 4,561.2 persons. Combined, the overall population projection is approximately 5,320.98 persons with an approximate density of 497 residents and jobs per hectare.

Total residential unit count and non-residential space of the proposed development and the corresponding Growth Plan and Region of Waterloo density projections are broken down and provided in Tables 2 and 3 below.

**Table 2: Development Statistics**

| Block        | Residential |         |        | Office         |       | Commercial     |       |
|--------------|-------------|---------|--------|----------------|-------|----------------|-------|
|              | Units       | People  | Jobs*  | m <sup>2</sup> | Jobs  | m <sup>2</sup> | Jobs  |
| 1            | 567         | 1,020.6 | 28.58  | --             | --    | --             | --    |
| 2            | 350         | 630     | 17.64  | --             | --    | --             | --    |
| 3            | 355         | 639     | 17.89  | --             | --    | --             | --    |
| 4            | 292         | 525.6   | 14.72  | --             | --    | 994            | 12.43 |
| 5            | 270         | 486     | 13.61  | --             | --    | 994            | 12.43 |
| 6            | 384         | 691.2   | 19.36  | --             | --    | --             | --    |
| 7            | 316         | 568.8   | 15.92  | --             | --    | --             | --    |
| 8            | --          | --      | --     | 18,216         | 607.2 | --             | --    |
| <b>TOTAL</b> | 2,534       | 4,561.2 | 127.72 | 18,216         | 607.2 | 1,988          | 24.86 |

\* Work from home rate of 2.5% of total population used based on Region of Waterloo methodology.

|                                    |                           |
|------------------------------------|---------------------------|
| Residential population assumptions | 1.77 people/unit          |
| Office population assumptions      | 1 person/30m <sup>2</sup> |
| Commercial population assumptions  | 1 person/80m <sup>2</sup> |

**Table 3: Development Population Projections**

|                                  |            |
|----------------------------------|------------|
| <b>Total People</b>              | 4,561.2    |
| <b>Total Jobs</b>                | 759.78     |
| <b>Total People + Jobs</b>       | 5,320.98   |
| <b>Total Site Area</b>           | 10.7 ha    |
| <b>Overall Projected Density</b> | <b>497</b> |

## 4. Proposed Applications

The following provides summaries of the proposed Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision applications. Assessment and justification of the proposed applications per the applicable Provincial, Regional and City planning policy framework are provided in Sections 6 and 7 of this Report.

### 4.1 Official Plan Amendment

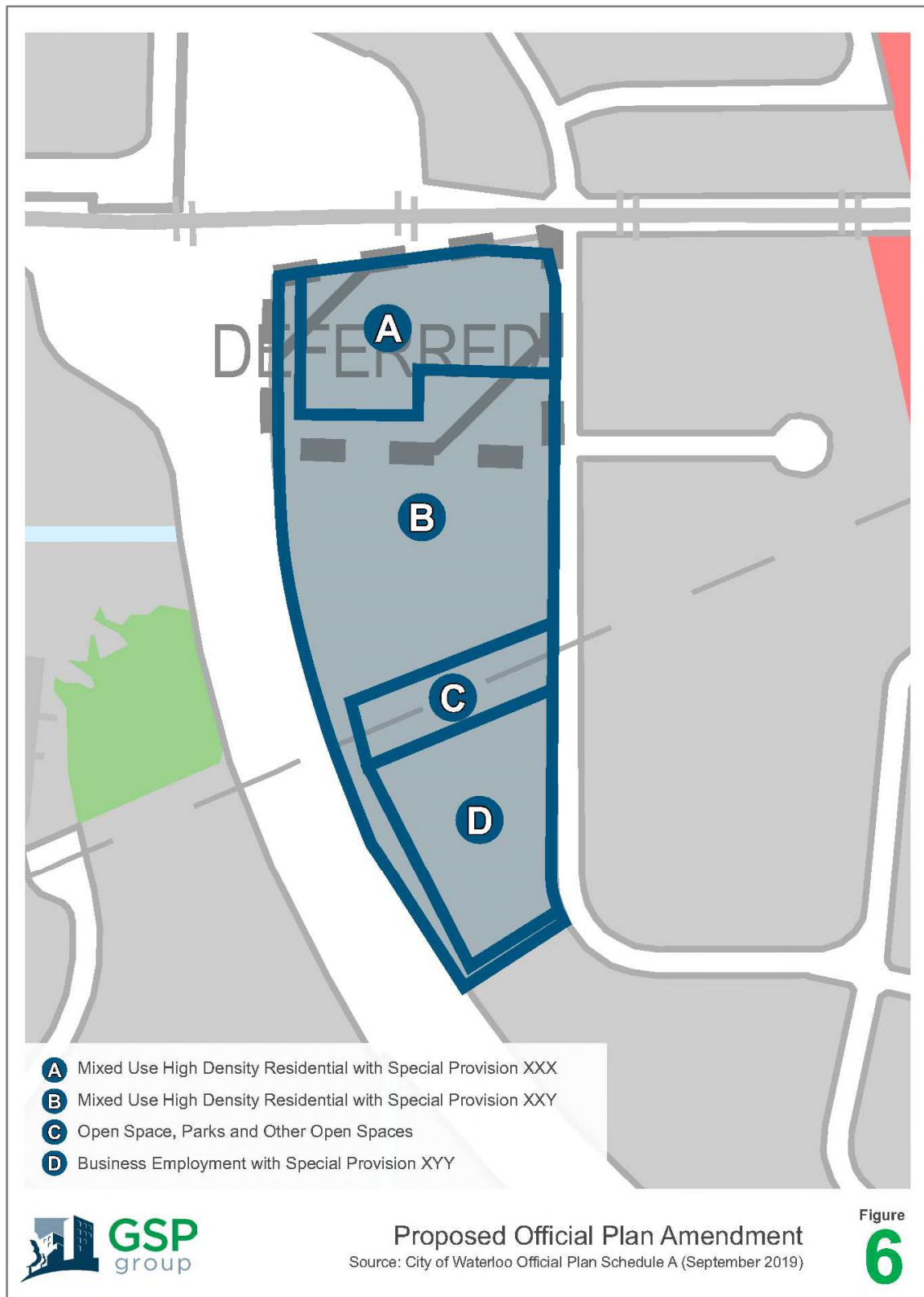
The proposed Official Plan Amendment will designate most of the Site as Mixed-Use High Density Residential (**Figure 6**). The proposed Official Plan Amendment will also include the following special provisions:

- Removal of the “DEFERRED” notation applying to the northerly third of the Site as noted on Schedule A, Schedule A2, Schedule A6, Schedule B and Schedule B1.
- Add new general policies to the Official Plan regarding the redevelopment of the Site, including but not limited to the design intent of the Proposed Development, the inclusion of minimum and maximum gross building floor areas requirements for employment and commercial uses, the establishment of a private internal driveway network to function as formal and legal lot frontage for future development blocks, servicing and infrastructure, phasing of development and urban design.
- Redesignate as Mixed-Use High Density Residential and add the following special provisions for “Area A”:
  - o Permit a high-density residential building with ground-floor retail and commercial uses capitalizing on the prominent location and view of this portion of the Site
  - o Permitted uses to include high-density residential with accessory, retail, restaurants, financial establishments, personal services, medical clinics, offices and personal services at-grade
  - o Residential uses permitted in stand-alone building or within a mixed-use building
  - o Non-residential uses only permitted within a mixed-use building
  - o Child-care centres, spiritual uses and community uses not permitted in buildings with frontage on Conestogo Road
  - o To permit a maximum building height of 35 storeys
- Redesignate as Mixed-Use High Density Residential and add the following special provisions for “Area B”

- o Permitted uses to include medium and high-density residential with accessory retail, restaurants, financial establishments, personal services, medical clinics, offices and personal services at-grade
- o Residential uses permitted in stand-alone building or within a mixed-use building
- o Non-residential uses only permitted within a mixed-use building
- o Child-care centres, spiritual uses and community uses not permitted in buildings with frontage on Conestogo Road
- o To permit a maximum building height of 25 storeys
- Maintain the Business Employment designation for “Area D” and add the following special provisions for “Area D”
  - o Child-care centres, spiritual uses and community uses not permitted in buildings with frontage on Conestogo Road or adjacent to the south property boundary

The proposed Official Plan Amendment would also designate the portion of the Site identified as “Area C” to Open Space, Park and Other Open Spaces with special provisions to permit a surface parking facility associated with business employment uses with no buildings or structures.

The details of the proposed Official Plan Amendment will be revised and refined through further discussions with and review of the application by the Region and City as well as input from the future developer(s) of the Site.

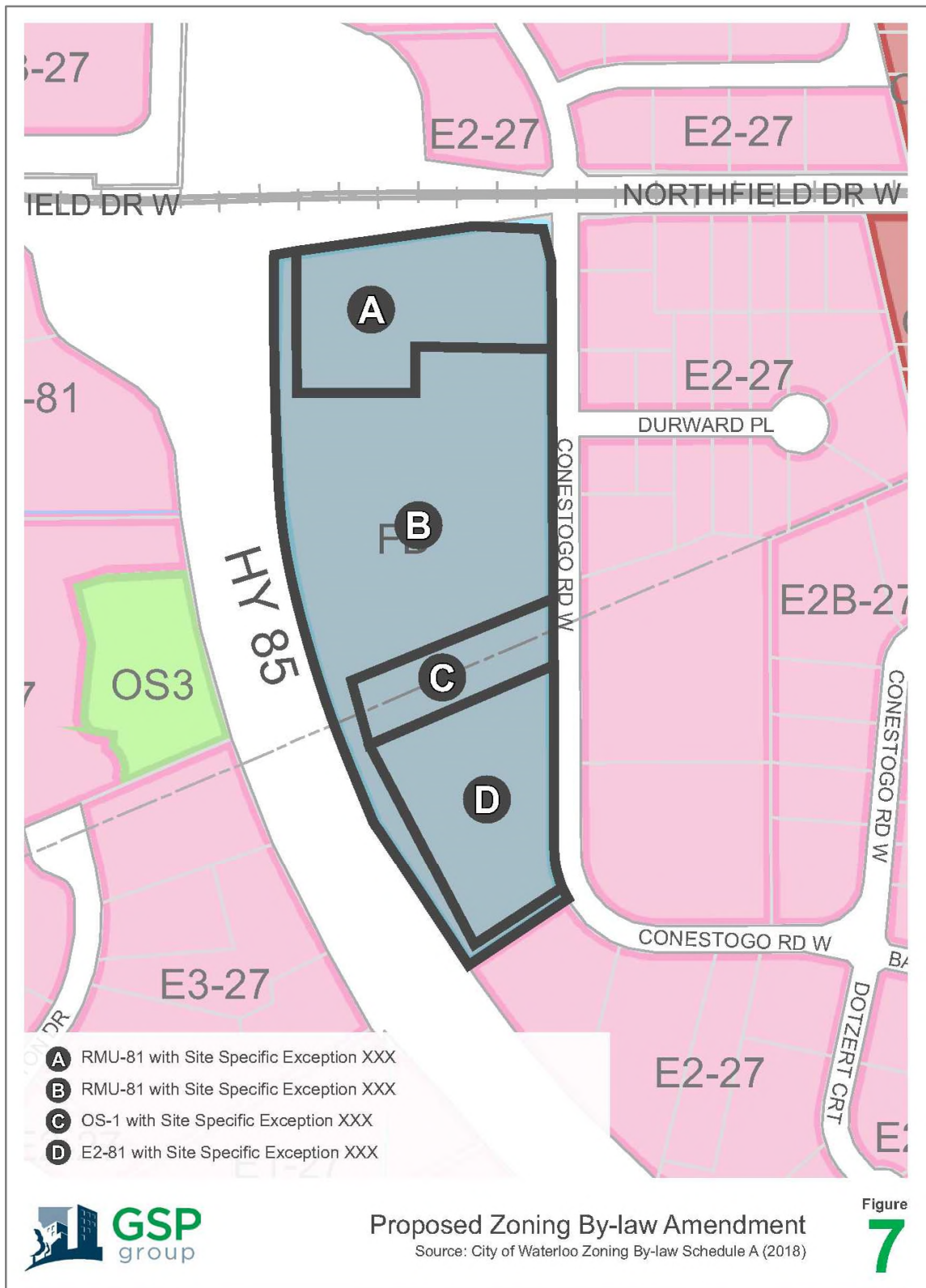


## 4.2 Zoning By-law Amendment

The proposed Zoning By-law Amendment will rezone the Site from Future Determination (FD) to Residential Mixed-Use Zone (RMU), Business Employment Two (E2) and Parks & Recreation (OS1) (**Figure 7**). The details of the proposed Zoning By-law Amendment are as follows:

- Establish overall site-specific exceptions to limit the types of employment and commercial uses permitted on site, reduce off-street parking requirements for residential and non-residential uses and general zoning regulations and considerations pertaining to lot lines and future subdivision of the land, including the consideration of the internal private road network as formal and legal lot frontage for future development blocks
- Rezone “Area A” to Residential Mixed-Use (RMU-81) with a site-specific exception to permit residential uses in standalone buildings or as part of a mixed-use building, permit non-residential uses only as part of a mixed-use building and establish minimum and maximum density and height requirements
- Rezone “Area B” to Residential Mixed-Use (RMU-81) with a site-specific exception to permit residential uses in standalone buildings or as part of a mixed-use building, permit non-residential uses only as part of a mixed-use building, limit the types of non-residential uses permitted and establish minimum and maximum density and height requirements
- Rezone “Area C” to Parks & Recreation (OS-1) with site-specific exceptions to permit a surface parking facility associated with business employment uses with no buildings or structures
- Rezone “Area D” to Business Employment Two (E2-27) with a site-specific exception to restrict the location of child-care centres, spiritual uses and community uses of non-residential uses permitted and establish minimum and maximum height requirements

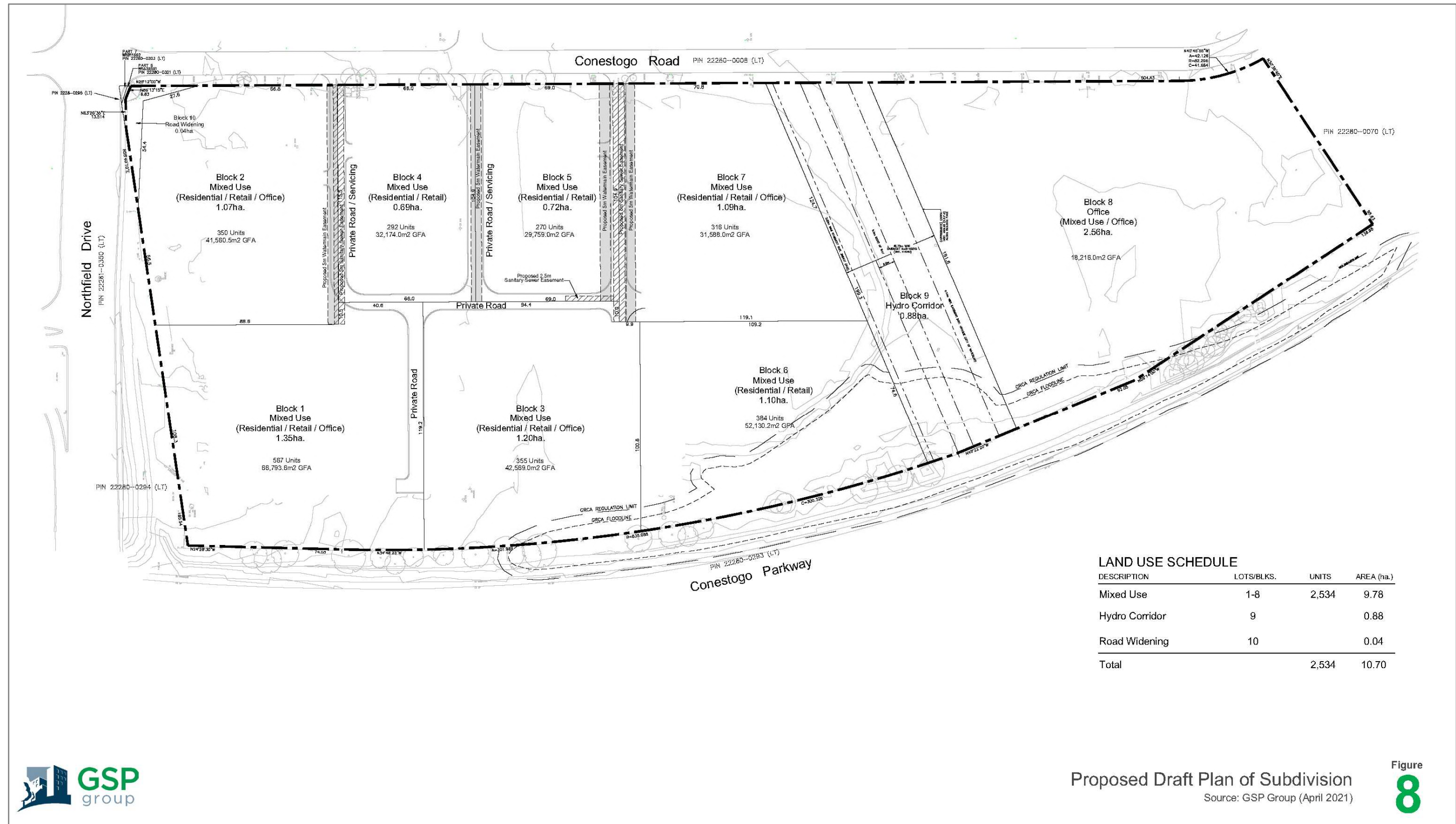
The details of the proposed Zoning By-law Amendment will be revised and refined through further discussions with and review of the application by the Region and City as well as input from the future developer(s) of the Site.



### 4.3 Draft Plan of Subdivision

The proposed Draft Plan of Subdivision is based on the Master Plan that identifies how the Site is proposed to be developed, including building configurations, interior private roads, parking ramps and open spaces (refer to **Figure 3**). The proposed Draft Plan of Subdivision is shown on **Figure 8** ("Draft Plan"). The Draft Plan proposes to subdivide the Site into 8 mixed-use blocks with Blocks 2, 4, 5, 7 and 8 having frontage on Conestogo Road and Blocks 1, 3 and 6 accessed via a future private driveway. Block 9 is the Hydro Corridor that will remain open space. The Draft Plan also includes a private road network that will provide vehicular access and municipal servicing and utility corridors that connect each of the 8 future development blocks. Each future development block will include podium and underground parking (**Figures 4 to 4c**). Finally, as identified in the Functional Servicing and Stormwater Management Report, each future development block will have individual future rights of access and servicing connections. The phasing of development for each of the blocks identified in the Draft Plan is outlined in Section 3.2 this Report.

The details of the proposed Draft Plan will be revised and refined through further discussions with and review of the application by the Region and City.



## 5. Supporting Studies

The Pre-Consultation Application process identified a number of technical studies required to address and assess technical matters used to inform the proposed redevelopment scheme. The following provides brief summaries of those technical studies; however, each report should be reviewed in detail to gain a full understanding of the technical matters addressed.

### 5.1 Scoped Environmental Impact Study

Natural Resource Solutions Inc. prepared a Scoped Environmental Impact Study (dated August 14, 2020) to assess the existing natural features on Site, including the watercourse associated with Forwell Creek located on the southwest portion of the Site (referred to as “Scoped EIS”). The Scoped EIS was not identified as part of the Pre-Consultation process, but it was considered important given the potential implications of the floodplain and stormwater management strategies to be implemented through the redevelopment.

The Scoped EIS included field programs to investigate potential habitat for Species at Risk and Significant Wildlife Habitat as well as field surveys for flora, bat, and aquatic habitat assessments. No species at risk, significant wildlife, and habitat of significance were identified on Site.

The Scoped EIS also evaluated the proposed pedestrian bridge crossing over the Parkway on both the east and west sides of the connection. It was concluded that there will be no impact to fish habitat or movements, and there will be no risk to flood damage to adjacent properties through the construction of the pedestrian overpass, subject to GRCA approvals.

Finally, the Scoped EIS evaluated the impacts of future stormwater drainage. It was concluded that the existing conditions of the Site are predominantly impervious and that there may be opportunities to improve future water quality through detailed and construction considerations, such as rooftop storage.

### 5.2 Functional Servicing and Stormwater Management Report

Walter Fedy prepared a Functional Servicing and Stormwater Management Report (dated June 6, 2021) (the “FSR Report”). The purpose of the FSR Report is to identify how the Proposed Development will be serviced, including water, sanitary and storm connections to the existing municipal infrastructure and included a preliminary stormwater management design.

The Report concluded the following regarding site servicing and stormwater management:

- The existing 300mm diameter sanitary sewer available to the Site on Conestoga Road is sufficient to accommodate the proposed redevelopment; however, additional capacity constraints are expected in the Lower Forwell Creek Trunk Sanitary Sewer with an additional 46 L/s of sanitary flow expected from the Site;
- The existing 300mm diameter watermain on Conestoga Road is sufficient to provide domestic and fire flows for the proposed redevelopment; however, additional water service connections to Northfield Drive may be required;
- Pre-development floor rates for the 2-year, 5-year and 100-year storm events will be met in post-development conditions as proposed development will result in overall less impervious area compared to existing condition
- The identified flood plain is a result of flood storage from backwater effects and not a floodway for conveyance; it will remain outside of the developments limits for the Site
- A storm sewer is proposed to replace the ditch along the north property limits within the Northfield Drive right-of-way;
- Waterloo North Hydro's distribution infrastructure will be impacted by the Proposed Development and will require further modifications as part of detailed site design;
- Silt fencing, filter fabric and construction entrance mud mats will provide for erosion and siltation control as part of future construction; further erosion and siltation control measures will be reviewed during detailed design; and
- Forthcoming regulations, the Record of Site Condition and associated CPU may impose additional restrictions on the site to be followed during and after construction.

### **5.3 Traffic Impact Study and Transportation Demand Management Report**

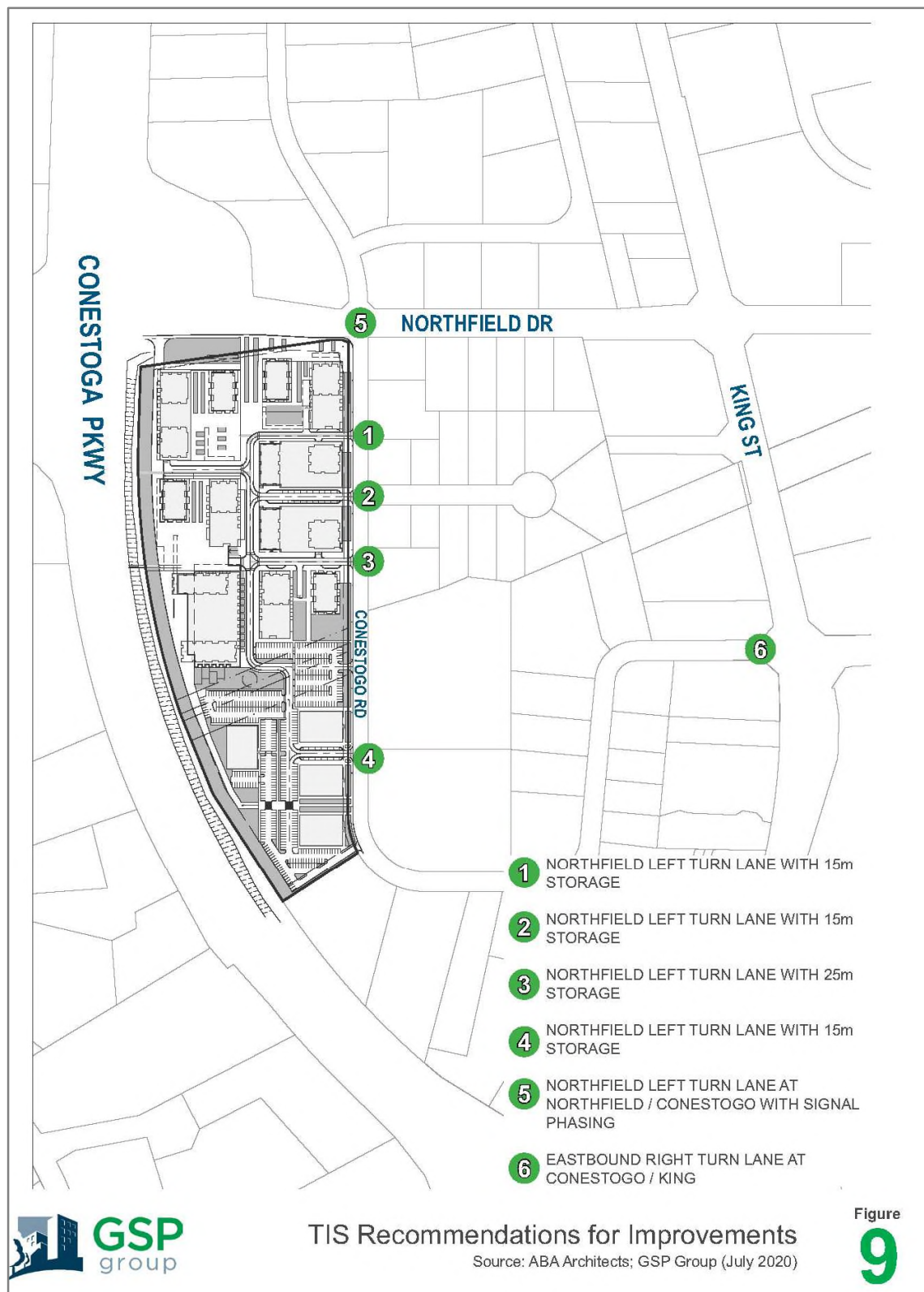
Paradigm Transportation Solutions Limited ("PTSL") prepared a Transportation Impact Study ("TIS") and Transportation Demand Management Report ("TDM Report") (dated June 2021) in support of the proposed applications. The TIS includes an analysis of existing traffic conditions, forecasted to full build out conditions, an analysis of five years beyond full built-out and recommendations for improvements to mitigate traffic impacts.

The TIS concludes that based on background traffic operations, all intersections within the study area will operate at adequate levels of service to the 2032 full build-out time horizon. Based on total traffic operations, which would include both background and development traffic, the following improvements are recommended:

- A northbound left-turn lane with 15 metres of storage length be constructed at Conestoga Road at proposed Access 1
- A northbound left-turn lane with 15 metres of storage length be constructed at Conestoga Road at proposed Access 2
- A northbound left-turn lane with 25 metres of storage length be constructed at Conestoga Road at proposed Access 3
- A northbound left-turn lane with 15 metres of storage length be constructed at Conestoga Road at proposed Access 4
- A northbound left-turn lane with protected/permissive signal phasing be constructed on Conestoga Road at Northfield Drive
- An eastbound right-turn lane be constructed at on Conestoga Road at King Street North.

Please refer to **Figure 9** for the identified improvements.

The TDM Report concluded that in accordance with the Region of Waterloo's TDM Checklist, the proposed redevelopment of the Site is rated as TDM Supportive, resulting in a 25% reduction in parking demand. The specified TDM parking reduction is based on existing pre-occupancy considerations, such as existing transit and LRT services, combined with future post-occupancy strategies, such as participation in the Region of Waterloo Travelwise and Community CarShare programs, on-site transit, cycling support, and unbundled parking.



### 5.3 Pedestrian Wind Assessment

RWDI prepared a Pedestrian Wind Assessment (dated May 6, 2021) in support of the proposed applications ("Assessment"). The Assessment was based on meteorological data from the Region of Waterloo International Airport applied to the proposed development concepts, wind-tunnel studies undertaken by RWDI for similar projects, and the use of 3D modelling software to estimate potential wind conditions.

The Assessment analyzed pedestrian wind conditions during the summer and winter to identify potential exceedances of wind safety criteria. The following likely conditions were identified upon full build-out:

- Given the size and massing of the Proposed Development, an increase in wind speeds on-site is expected, but with no significant impact on surrounding neighbours;
- There is potential for some on-site locations to exceed wind safety criterion;
- Public sidewalks are expected to have appropriate and acceptable wind conditions;
- Supplementary wind control strategies have been incorporated in an effort to improve conditions at some sidewalk areas and most of the major building entrances;
- Roof deck courtyards have also incorporated design features in an effort to reduce wind impacts; however, winter conditions may still be a challenge in isolated cases; and
- Scale modelling testing in a wind tunnel is recommended to confirm and quantify the predictions in this report and rescind wind control strategies where required.

This preliminary assessment will inform the subsequent Site Plan Control applications that will be required to be approved prior to redevelopment of the Site. Further detailed assessments, including a wind tunnel assessment, is recommended as part of future detailed site plan design, phasing, and construction.

### 5.4 Master Plan & Design Guidelines

GSP Group prepared the Master Plan & Design Guidelines (dated June 2021) in support of the proposed development of the Site ("Design Guidelines"). The Design Guidelines includes a Master Plan for the proposed mixed-use community and provides direction for the overall vision, character, form, and function of the Kraus District.

The Design Guidelines include a description of the existing site context, including site conditions, topology, natural features and landscaping, existing buildings and access

points, and community context as well as a provides a brief summary of influencing design policy and guidelines, including the Official Plan and the City of Waterloo Urban Design Manual.

The Design Guidelines are organized as three interrelated layers of the Master Plan:

- The Structure Plan with generally outlines the core structure elements of the Master Plan, including the pattern of buildings, streets and development blocks, circulation, open space areas, and general built form;
- The Development Plan that more specifically outlines and guides the future development of different block typologies within the Master Plan and the organization and phasing of such development blocks; and
- The Public Realm Plan that outlines and guides the design of internal streets, outdoor spaces, amenities, and open space features.

The Design Guidelines are intended to provide direction for the overall development of the Master Plan, which is to be implemented through detailed design and site plan approval. The Design Guidelines provide general, overall direction for the proposed development while remaining flexible and adaptable to adjust to changes and refinements that are expected through the detailed design and construction of such a comprehensive development project.

## **5.5 Noise and Vibration Impact Study**

RWDI prepared a Noise and Vibration Impact Study (“NVIS”) to assess noise impacts from road traffic on Conestoga Parkway, Conestoga Road, Durward Place and Northfield Drive as well as noise from light rail traffic and the proximate Conestoga and Northfield iON Stations. In addition, potential vibration impacts were assessed in relation to the rail traffic noise. Initial screening was completed for possible stationary noise sources, which indicated no significant stationary noise sources proximate to the Site.

The NVIS recommends the following noise control measures for the proposed development:

- The use of window glazing and exterior doors with appropriate sound isolation to adhere to minimum noise level requirements
- Construction of exterior walls to adhere to minimum noise level requirements
- The installation of central air conditioning units for all buildings located on Block 1A, 1B, 1C, 2A, 2B, 3A (tower only), 3B, 6, 8C and 8D, and provisions for the

future installation of central air condition for all buildings on Blocks 3A (podium only), 4, 5, 7A, 7B, 8A and 8B

- The construction of perimeter noise barriers for outdoor amenity areas as specified
- The inclusion of noise warning clauses related to transportation levels and future commercial facilities as required
- Inclusion of warning clauses related to vibration associated with

The vibration produced by light-rail transit passes are within acceptable levels, and therefore no vibration mitigation is required.

The NVIS concluded the proposed development was feasible from a noise and vibration perspective, and recommended more detailed noise assessments as part of the future detailed site plan design and subject building permit applications

## **5.6 Land Use Compatibility Assessment**

RWDI prepared a Land Use Compatibility Assessment (dated May 6, 2021) to address the requirements of the City of Waterloo and Region of Waterloo for compatibility and mitigation ("Compatibility Assessment"). The Compatibility Assessment addresses the potential for land use conflicts arising from the proximity of the Site to surrounding industrial facilities whose emissions have the potential to impact the proposed development.

The Compatibility Assessment included a search of lands within a 1.0 km radius of the site using satellite imagery as well as the Ontario Ministry of the Environment, Conservation and Parks (MECP) database for Environmental Compliance Approvals (ECA's) and/or Environmental Activity and Sector Registrations (EASR's), a review of the emissions reported to the National Pollution Released Inventory (MPRI), a review of meteorological wind data, and the interpretation of this information based on the MECP D-6 Classification.

The Compatibility Assessment concluded there are no potential compatibility issues from an air quality perspective were identified with respect to existing employment uses in the vicinity of the proposed development.

## 6. Policy Overview and Analysis

### 6.1 Ontario Planning Act

#### 6.1.1 Matters of Provincial Interest

The *Planning Act R.S.O. 1990, c. P.13* (“Planning Act”) establishes the framework for land use planning in Ontario. The Planning Act provides for the integration of provincial matters in planning decisions; details a planning process that is fair, accessible, timely and efficient; encourages cooperation and coordination amongst various interest groups; and recognizes the decision-making authority and accountability of municipal councils in the planning procession.

The Planning Act requires that all planning decisions shall “*have regard to*” matters of Provincial interest as identified in Section 2. These matters are general in nature and broad in range and are addressed in more detail through the Policy Statements and Provincial Plans issued under Section 3 of the Planning Act and through the official plans of the Region of Waterloo and City of Waterloo. The following table provides an analysis of the Proposed Development in response to the prescribed Provincial interest of Section 2 of the Planning Act.

| Section | Provincial Interest                                                                                                           | Response                                                                                                                                                                                                                                        |
|---------|-------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a)      | The protection of ecological systems, including natural areas, features, and functions;                                       | Refer to Scoped EIS                                                                                                                                                                                                                             |
| b)      | The protection of agricultural resources in the Province;                                                                     | Not applicable                                                                                                                                                                                                                                  |
| c)      | The conservation and management of natural resources and mineral resource base;                                               | Refer to Scoped EIS                                                                                                                                                                                                                             |
| d)      | The conservation of significant architectural, cultural, historical, archaeological, or scientific interests                  | Not applicable                                                                                                                                                                                                                                  |
| e)      | The supply, efficient use and conservation of energy and water;                                                               | As the Site is located within a Source Water Protection, the Proposed Development and associated activities will be required to adhere to the provisions of Clean Water Act and associated Source Protection Plan.                              |
| f)      | The adequate provision and efficient use of communications, transportation, sewage and water services and wastewater systems; | As noted in Section 2.2 of this Report, the Site is serviced by existing communications, transportation, sewage, water, and wastewater connections. The existing services have been determined adequate to accommodate the future redevelopment |

|      |                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      |                                                                                                                   | of the Site and will continue to be efficiently used in the future.                                                                                                                                                                                                                                                                                                                                                                                                             |
| g)   | The minimization of waste;                                                                                        | Future development of the Site will be required to adhere to the <i>Resource Recovery and Circular Economy Act, S.O. 2016, Chapter 12, Schedule 1</i> and the requirements contained therein with respect to waste diversion and management.                                                                                                                                                                                                                                    |
| h)   | The orderly development of safe and healthy communities;                                                          | The proposed redevelopment of the Site represents intensification of an existing, serviced urban property. The Site will be designed to provide for safe access to and from future development and will be phased in an orderly and logical manner.                                                                                                                                                                                                                             |
| h.1) | The accessibility of persons with disabilities to all facilities, services and matters to which this Act applies; | The proposed development will be designed and constructed in accordance with the <i>Access for Ontarians with Disability Act, 2005, S.O. 2005, c. 11.</i> ; specific details to be confirmed as part of the Site Plan application process.                                                                                                                                                                                                                                      |
| i)   | The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;    | As noted in Section 2.3 of this Report, the Site is proximate and can easily access several existing educational, social, cultural, and recreational facilities, including parks, schools, and religious institutions.                                                                                                                                                                                                                                                          |
| j)   | The adequate provision of a full range of housing, including affordable housing;                                  | The proposed redevelopment scheme includes high-density, multi-unit residential dwellings, which by nature are considered a more affordable form of housing. Further considerations for the provision of affordable housing will be review and discussed with the City and Region as part of application process.                                                                                                                                                               |
| k)   | The adequate provision of employment opportunities;                                                               | The proposed Master Plan includes approximately 1,988 m <sup>2</sup> of retail commercial space and approximately 18,216 m <sup>2</sup> office space. The future retail and office space will generate an employment population of approximately 24.86 and 607.2 jobs respectively (759.78 jobs combined). This is a moderate increase in employment population for the Site, which had a peak of 450 employees associated with the former Kraus Group of Companies operations. |

|    |                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                            | In addition, the future redevelopment of the Site will likely have a 5- to 7-year construction program, generating short-to medium-term employment opportunities for the construction industry.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| l) | The protection of the financial and economic well-being of the Province and its municipalities;                            | <p>The redevelopment of the Site does not require any financial investment from the City or Region for municipal infrastructure and services. The Site is adequately serviced by existing community and public services, and extension of municipal infrastructure is the responsibility of the future developer.</p> <p>The proposed development does include a pedestrian connection across the Parkway to provide a direct connection to the Northfield iON Station. The proposed pedestrian connection will be of tremendous benefit to the City and Region, providing a direct and easy connection to the Northfield iON Station, thereby creating opportunities for significant increased LRT ridership. The proposed pedestrian connection will require financial contributions by the municipalities.</p> |
| m) | The coordination of planning activities of public bodies;                                                                  | The proposed applications will be circulated to all commenting agencies and stakeholders by the City for review and comments prior to Council rendering a decision on the proposed planning applications.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| n) | The resolution of planning conflicts involving public and private interests;                                               | Resolution of planning conflicts that may arise through consideration of the proposed applications will be addressed as part of circulation and review process, which will include informal and formal public meetings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| o) | The protection of public health and safety;                                                                                | Not applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| p) | The appropriate location of growth and development; and                                                                    | The Site is an appropriate location for development through intensification and redevelopment and represents an excellent opportunity for growth within the existing Built-Up Area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| q) | The promotion of development that is designed to be sustainable, to support public transit and be oriented to pedestrians; | The Site is proximate to existing GRT and iON services along Northfield Drive and will add significant trips on the LRT. The Site is also within walking distance to several surrounding commercial,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|    |                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                                                                           | community, educational, social, and cultural uses.                                                                                                                                                                                                                                                                                                                                                                                                    |
| r) | The promotion of built form that:<br>i) is well designed;<br>ii) encourages a sense of place; and<br>iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant. | The proposed development has been designed to create a destination, mixed-use node in north Waterloo.<br><br>The future redevelopment of the Site includes a network of walkways, courtyards, a promenade, and common amenity areas to serve future residents that can also be accessed by the public.<br><br>The Site is highly accessible from the surrounding road and pedestrian network and is proximate to several public and community spaces. |
| s) | The mitigation of greenhouse gas emissions, and adaption to a changing climate.                                                                                                                           | Please refer to the Sustainability Design Statement included as part of the Urban Design Brief.                                                                                                                                                                                                                                                                                                                                                       |

Based on the above-noted analysis, the proposed redevelopment of the Site conforms to the Planning Act.

### 6.1.2 Policy Statements and Plans

Section 3(5) of the Planning Act specifically requires that decisions of municipal councils regarding the exercise of authority concerning planning matters “*shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision*” and “*shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be*”. The *Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe* and the *Grand River Source Water Protection Plan* are applicable and relevant to the consideration of the proposed applications per Section 3(5) of the *Planning Act*. The *Greenbelt Plan*, *Oak Ridges Moraine Conservation Plan*, *Niagara Escarpment Plan* and *Metrolinx Act* along with associated policy statements do not apply to land within the Region of Waterloo. While there has been no policy statement issued under the *Resource Recovery and Circular Economy Act*, the proposed development will be required to adhere to the requirements related to waste diversion and management.

### 6.1.3 Criteria for Subdivisions

Section 51(24) of the *Planning Act* identifies a municipality's consideration of a draft plan of subdivision shall have regard to “*the health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants*”, as well more specific criteria of provincial interest, including but not limited to conformity with official plans, suitability of the Proposed Development, conservation of natural heritage

resources, adequacy of infrastructure, community services and school sites, and affordable housing. The effects of the Proposed Development on matters of provincial interest are reviewed and assessed in terms of the *Provincial Policy Statement*, *Growth Plan for the Greater Golden Horseshoe*, the *Regional Official Plan* and the *City of Waterloo Official Plan* in the following sections of this Report.

## 6.2 Provincial Policy Statement

The *Provincial Policy Statement* (“PPS”) provides policy direction on matters of provincial interest, and guides growth and development in Ontario. The PPS supports land use planning that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS is issued under Section 3 of the Planning Act and came into effect on May 1, 2020, replacing the PPS issued April 30, 2014. The following provides a summary of the key PPS policy consideration for the Site as well as justification for the proposed development in response to these policies.

The PPS encourages efficient land use and development patterns that support sustainability and promotes strong and resilient communities. Policy 1.1.1 of the PPS states that healthy, liveable and safe communities are sustained by:

- a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;
- b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
- e) promoting the integration of land use planning, growth management, transit-supportive development, intensification, and infrastructure planning to achieve cost-effective development patterns, optimization of transit investment, and standards to minimize land consumption and servicing costs; and
- g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and project needs.

*Response: The proposed development will result in the establishment of a vibrant, sustainable mixed-use neighbourhood and will contribute to the overall liveability of the broader community. In respect of the above-noted policies, the Proposed Development:*

- a) *Represents significant intensification of an underutilized property located within the Built-up area of the City. The future development of the Site will result in the development of a compact, high-density mixed-use community that requires no financial investment from the Province, Region or City to sustain the long-term viability of the proposed development and will contribute to the continued well-being and prosperity of the City over the long-term.*
- b) *Provides for a range of commercial, residential, community and open space uses in addition to intensified employment uses on the Site that will serve the needs of future residents as well as the broader community. The future redevelopment of the Site will broaden the range and mix of uses and projected densities of an urban property ideally situated between two LRT stations.*
- e) *Efficiently uses existing municipal infrastructure and hard services available to the Site through intensified development, and significantly increases the future residential and employment populations through compact development with significant opportunities for increased GRT and LRT ridership.*
- g) *Is proximate to a number of existing community and public services, including community centres, public parks and open spaces, schools, and Regional-scale commercial and retail opportunities.*

The PPS directs growth and development to settlement areas and encourages land use patterns that are based on densities and a mix of land uses which (1.1.3.2):

- a) efficiently use land and resources;
- b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
- c) minimize negative impacts to air quality and climate change, and promote energy efficiency;
- d) prepare for impacts of a changing climate;
- e) supports active transportation; and
- f) are transit-supportive, where transit is planned, exists, or may be developed.

*Response: The Site is located within the Built-up area of the City. The proposed development will result in a large scale, high-density, mixed-use community that combines office, commercial, residential, community and open space uses. With a total projected residential and employment population of approximately 5,320.98 people, the proposed development will make use of existing municipal infrastructure with minimal improvement requirements and will significantly increase ridership opportunities for existing GRT and LRT services. Energy efficiency and opportunities for renewables will be addressed at the*

*time of detailed building design. The Master Plan includes large landscape spaces and courtyards, maximizing area for plantings and landscape features.*

Section 1.1.3.3 requires municipalities to identify appropriate locations and promote opportunities for transit-supportive development and accommodating a significant supply and range of housing options through intensification where it can be accommodated.

*Response: The Site is located within the Conestoga iON Station Area. In accordance with the policies of the City Official Plan pertaining to Major Transit Station Areas, which is discussed in detail in Section 6.5 of this Report, such areas are required to provide for a mix of transit supportive uses in a compact form that contributes to higher residential and non-residential densities and create attractive places for working, living and recreation. With a total of approximately 2,534 new residential units, the future redevelopment of the Site significantly increases the supply and range of housing options proximate to the Northfield iON Station.*

The PPS requires municipalities to provide for an appropriate range and mix of housing options and densities to meet current and future residential populations. In accordance with Section 1.4.3 (b), this range and mix of housing options can be provided through permitting all housing options to meet the social, health, economic and well-being requirements of residents and allowing for all types of residential intensification. Section 1.4.3 (c) to (e) further requires the following:

- c) directing development of new housing towards locations where appropriate levels of infrastructures and public service facilities are or will be available...
- d) promoting densities for new housing which efficient use land, resources, infrastructure, and public services, and support the use of active transportation and transit...
- e) requiring transit-supportive development and prioritizing intensification...

*Response: The Kraus Group of Companies previously used the Site for manufacturing, distribution, and administrative office purposes with approximately 450 employees at the peak of its operations, which equated to approximately 1 employee per 237.7 m<sup>2</sup> of employment gross floor area. The proposed redevelopment includes a total of 759.78 new jobs, which equates to 1 employee per 26.6 m<sup>2</sup> of employment gross floor area. With a total residential population projection of approximately 4,561.2 people and an overall population projection of 5,320.98 people, the proposed development represents significant intensification of the property, bringing higher employment and new residential densities to an underutilized property with existing municipal services and infrastructure. The Site is located between the Conestoga iON Station and the Northfield iON Station with existing GRT services operating on Northfield Drive; these public transit facilities are located within*

*a comfortable walking distance for employees and future residents. The Lakeshore, Lakeshore North and Lincoln communities all contain existing parks, community and institutional uses that will be accessible to future residents by various modes of transportation.*

In summary, the proposed redevelopment scheme for the Site is consistent with the PPS. The PPS contains specific policies regarding employment uses and employment areas. These policies, along with similar policies of the *Growth Plan for the Greater Golden Horseshoe*, the *Regional Official Plan* and the *City of Waterloo Official Plan* will be discussed in detail in Section 7.0 of this Report.

### **6.3 Places to Grow: Growth Plan for the Greater Golden Horseshoe**

The *Growth Plan for the Greater Golden Horseshoe* (“Growth Plan”) provides policy direction on land use planning considerations, including promoting mixed-use, compact urban form, redevelopment and intensification, and the efficient use of community infrastructure.

The Growth Plan derives its authority from the *Places to Grow Act, 2005, S.O. 2005, c. 13*, and guides municipal decisions regarding growth and development. The following provides a summary of the key Growth Plan policy consideration for the site as well as justification for the proposed development in terms of these policies.

Policy 2.2.1.2 (a) directs the majority of growth to settlement areas that have a delineated built boundary, have existing municipal water and wastewater systems, and supports the achievement of complete communities. Policy 2.2.1.4 further identifies the following policy considerations meant to contribute to the development of complete communities:

- a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public services facilities;
- b) improve social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes;
- c) provide a diverse range and mix of housing options, including second units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;
- d) expand convenient access to:
  - i. a range of transportation options, including options for the sale, comfortable and convenience use of active transportation;
  - ii. public services facilities, co-located and integrated into community hubs;

- iii. an appropriate supply of safe, publicly accessible open spaces, parks, trails, and other recreational facilities; and
  - iv. health, local, and affordable food options, including through urban agriculture;
- e) provide for a more compact built form and a vibrant public realm, including public open spaces;
- f) mitigate or adapt to climate change impacts, improve resilience, and reduce greenhouse gas emissions and contribute to environmental sustainability; and
- g) integrate green infrastructure and appropriate low impact development.

*Response: The Site is within the Built Boundary for the City, will be serviced by existing municipal water and wastewater services, and will be developed as a complete community onto itself, providing for a mix of employment, commercial, residential, community and park/open space uses. In respect of the above-noted policies, the proposed development:*

- a) *Will create a live/work environment for future residents through its mix of employment, residential, community, commercial and open spaces uses, and is proximate to a variety of existing community and public services within the broader community.*
- b) *Will create a modern, well-designed mixed-use community that provides a full range of amenities and services on-site to cater to future residents as well as the broader community. The employment and commercial permissions as proposed will accommodate a variety of companies and businesses with building floor plates responsive to the current market demands, while the future residential units will range in type from studio to three-bedroom apartments, appealing to a wide range of ages, household types and incomes.*
- c) *Provides a variety in size and types of residential units intended to appeal to a range of household types and needs, including future opportunities for affordable housing to be explored with the Region and City.*
- d) *Is advantageously located close to a range of transportation options; between two existing iON Stations, along an existing GRT Route, direct access to surrounding on-street pedestrian and cycling facilities, and easy access to the broader street network via Conestogo Road and Northfield Drive. The Master Plan includes a pedestrian crossing of Conestoga Parkway providing direct access to the Northfield iON Station as well as a network of on-site parkades, plazas and promenades. The proposed development provides combined access to on-site open space and park facilities with access to off-site park, recreation, and community spaces.*
- e) *Provides for a much more intensified and compact form of development on the Site. The former operations of Kraus Carpet included an approximate gross floor area of 81,000 m<sup>2</sup> whereas the Proposed Development will have an overall gross floor area of*

*314,790.3<sup>2</sup> (above grade) spanning across a total of 15 buildings; the intensification of development on the Site will increase by more than 300%. This compact, intensified use of the Site will include an integrated and well-designed network of open spaces to serve future residents.*

*A Sustainable Design Strategy has been included as part of the Urban Design Brief, which provides commentary on the sustainable design, construction and future operation elements, including by not limited to energy reduction and conservation methods, building construction methods and materials and landscape features.*

The Growth Plan requires that a minimum of 50% of all residential development occurring annually within the Region of Waterloo be located within the delineated built-up area (2.2.2.1(a)).

*Response: With the addition of approximately 4,561.2 new residents, the Proposed Development will assist the Region and City in achieving their residential intensification targets.*

The Growth Plan prioritizes growth and development for *major transit station areas*. A *Major Transit Station Area* is defined in the Growth Plan as:

*“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.”*

As illustrated on **Figure 2**, the entire Site falls within 800 metres of two *Major Transit Station Areas* (Northfield iON Station and Conestoga iON Station) within a *Priority Transit Corridor* (the LRT).

Policy 2.2.4.3 (a) requires that a minimum density target of 160 residents and jobs per hectare for those areas served by light rail transit. Policy 2.2.4.9 further states that development in *major transit station areas* will be supported that achieves the following:

- a) planning for a diverse mix of uses, including second units and affordable housing, to support existing and planned transit services levels;
- b) fostering collaboration between public and private sectors, such as joint development projects;
- c) providing alternative development standards, such as reduced parking standards;

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

*Response: With a total people and jobs projected population of approximately 5,320.98, the proposed development will result in approximately density of 497 residents and jobs per hectare, far exceeding the minimum density targets for major station areas established by the Growth Plan. The proposed redevelopment scheme includes the construction of a direct pedestrian connection to the Northfield iON Station located to the west of the Site in collaboration with the City and Region. At full build-out, the proposed development is anticipated to generate daily LRT ridership of approximately 3,500 trips. Finally, the Zoning By-law Amendment includes a reduced parking requirement for all uses to reflect the proximity of the Site to existing light rail and transit services.*

Policy 2.2.6.1 (a) requires municipalities to support housing choice through the achievement of the minimum intensification and density targets of the Growth Plan by identifying a diverse range and mix of housing options and densities and establishing targets for affordable ownership housing and rental housing.

*Response: Housing types identified as part of the Master Plan include mid-rise and high-rise apartment forms with unit sizes ranging in size and form from studio dwellings to three-bedroom units. While multi-unit residential buildings are considered a more affordable time of housing, discussions with the Region and City regarding affordable housing options will be pursued at the time of detailed site design and development.*

In summary, the proposed development conforms with the Growth Plan as demonstrated in the commentary provided above.

Section 2.2.5 of the Growth Plan contains policies related specifically to employment uses and the conversion of employment land to permit a broader range of non-employment uses. These policies are discussed in detail in Section 7.2 of this Report.

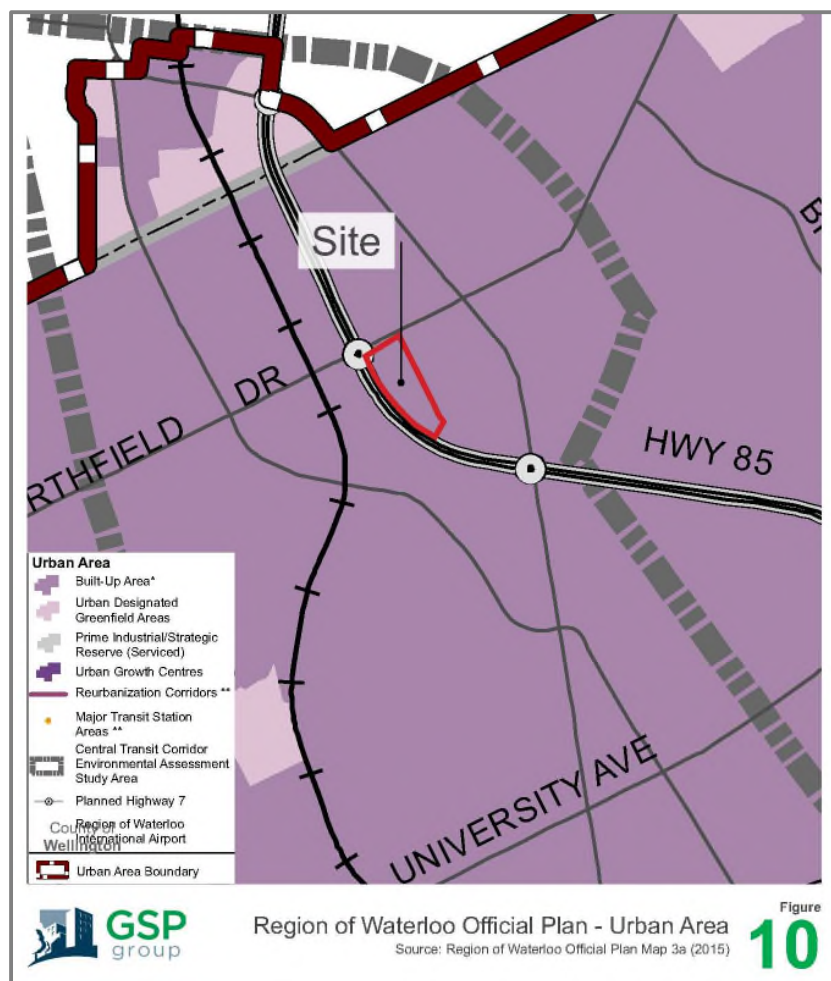
## **6.4 Regional Official Plan**

The new *Regional Official Plan* ("ROP") was adopted by the Region of Waterloo in June 2009 and received final approval from the Ontario Municipal Board ("OMB") on June 18, 2016. The ROP provides policy direction on planning matters for the Region and includes all policy changes and amendments since the adoption of the Regional Official Policies Plan ("ROPP") in 1995.

The following provides a summary of the key ROP policy consideration for the site as well as justification for the proposed development in terms of these policies.

The site is located within the built-up area for the City of Waterloo (**Figure 10**). In accordance with Policy 2.C.2, a minimum of 45% of all new residential development occurring annually within the Region of Waterloo is to be constructed within an existing built-up area.

*Response:* As noted previously, the addition of approximately 4,561.2 residents, the proposed development will assist the Region in achieving their residential intensification targets.



Policy 2.D.1 identifies policies that should be considered when reviewing new development applications. The following policies will ensure that growth is “planned and developed in a manner that”:

- a) supports the Planning Community Structure described in this Plan;
- b) is serviced by a municipal drinking-water supply system and a municipal wastewater system;
- c) contributes to the creation of complete communities with development patterns, densities and appropriate mix of land uses that supports walking, cycling and the use of transit;
- d) protects the natural environment, and surface water and groundwater resources;
- e) facilitates residents’ access to locally grown and other healthy foods in neighbourhoods;
- f) promotes building designs and orientations that incorporate energy conservation features and the use of alternative and/or renewable energy systems.

*Response: The proposed development is a master-planned mixed-use community located within the built-up area of the City. In respect of the above-noted policies, the proposed development:*

- a) Is located within the City Urban Area, which is intended to be the focus of the majority of the Region’s growth and development. The Site is located within two major transition station areas and the future redevelopment scheme is compact, high density and mixed-use in form.*
- b) Is serviced by existing municipal water and wastewater services on Conestogo Road and Northfield Drive.*
- c) Includes a mix of high-density residential, commercial, employment, community, and open spaces, creating an independent complete community with transit, cycling and pedestrian access to the existing amenities and services offered throughout the broader community.*
- d) A scoped EIS has been completed in support of the proposed development and confirms there is no Significant Wildlife Habitat or Species at Risk.*
- e) Locates the highest and most dense building forms at the northwest corner of the property, then transitions in height and density moving southeast across the Site, towards the existing employment uses on the east side of Conestogo Road. The Official Plan and Zoning By-law Amendments also proposes to include sensitive use restrictions to protect the character of the existing employment district on the east side*

*of Conestoga Road (i.e.: prohibiting day care facilities, spiritual uses and community uses along the Conestoga Road frontage).*

- f) Will include permissions for restaurants and food stores for future residents. The Site is proximate to accessible food stores and restaurants at Conestoga Mall and the existing commercial retail uses located at the intersection of Northfield Drive and Weber Street. The Site is also located approximately 1.8 km south of the St. Jacob's Farmer Market, a source for an extensive collection of local grown produce and food.*

Policy 2.D.7 outlines policies that are to be considered when reviewing development applications on or near sites that are served by existing or planned rapid transit to ensure the following:

- a) creates an interconnected and multi-modal street pattern that encourages walking, cycling or the use of transit and supports mixed use development;
- b) supports a more compact urban form that locates the majority of transit supportive uses within a comfortable walking distance of a transit stop of *Major Transit Station Areas*;
- c) provides an appropriate mix of land uses... that allows people to walk or take transit to work, and provides for a variety of services and amenities that foster vibrant, transit-supportive neighbourhoods;
- d) promotes medium and higher density development as close as possible to the transit stop to support higher frequency transit service and optimize transit rider convenience;
- e) foster walkability by creating pedestrian-friendly environments that allow walking to be a safe, comfortable, barrier-free and convenience form of urban travel;
- f) supports a high-quality public realm to enhance the identity of the area and create gathering points for social interaction, community events and other activities;
- g) provides access from various transportation modes to the transit facility, including consideration of pedestrian, bicycle parking.

*Response: The Site is located 300 east of the Northfield iON Station and 650 west of the Conestoga iON Station. In response to a) and b), the proposed development includes a network of interconnected trails, parks and promenades providing access both internal and external to the Site, including a devoted pedestrian connection to the Northfield iON Station. The dense mix of residential, employment, commercial and community uses will greatly enhance the opportunity for increased transit ridership, estimated at over 3,500 trips per day. With respect to c) and d), the future redevelopment plan is compact in form and will result in medium- and high-density residential and employment uses proximate to two iON stations and existing GRT services on Northfield Drive. With respect to e), f) and g), the proposed development has been designed with a focus on pedestrian connectivity*

*through the creation of enhanced, accessible public spaces, including the pedestrian promenade along the western property boundary (adjacent to the Parkway). The open space and landscape network will be of high-quality design, creating opportunities for social gatherings, community events and casual interactions.*

Policy 2.D. 7 further states that Major Transit Station Areas will be planned to achieve increased densities to support rapid transit service levels and a mix of residential office, institutional and commercial development.

*Response:* *The future development of the Site is projected to provide for an approximate density of 497 residents and jobs per hectare through a mix of medium to high-density residential, employment, commercial and community uses.*

In summary, the proposed development confirms with the ROP for the reasons and justification provided above.

Section 4.A of the ROP contains policies related employment areas and the conversion of employment land to permit a broader range of non-employment uses. These policies will be discussed in detail in Section 7.3 of this Report.

## **6.5 City of Waterloo Official Plan**

The *City of Waterloo Official Plan* (“OP”) was approved by the Region of Waterloo on November 21, 2012 and further revised December 13, 2012. The OP does not include recent changes to provincial policy since the previous consolidation, including the new PPS (2020) and the Growth Plan (2017).

As part of the Official Plan in 2012, the entire Site was initially identified as “DEFERRED”, pending the preparation of a Master Plan for redevelopment, which was to include a significant employment component. The deferral was endorsed by both City and Regional Councils anticipating the preparation of a private Master Plan application for change in use in collaboration with the municipalities and commenting agencies.

In April 2012, the Staff Report for the City of Waterloo in considering the original “Deferral” stated:

*“That the Council-adopted Official Plan be forwarded to the Region of Waterloo for approval, provided further:*

*i) that Council request that the Region of Waterloo Council defer its decision for this Official Plan in relation to the lands known municipally as 525 and 565 Conestoga Road West to allow for consideration of further planning to determine the*

*appropriate land uses for the site, recognizing the intent of the lands are to be used primarily for employment purposes”*

The Region of Waterloo subsequently approved the OP with the requested “Deferral” over the entire Site. The Region’s Staff Report (P-12-115) recognized the uniqueness of the Site and its locational attributes:

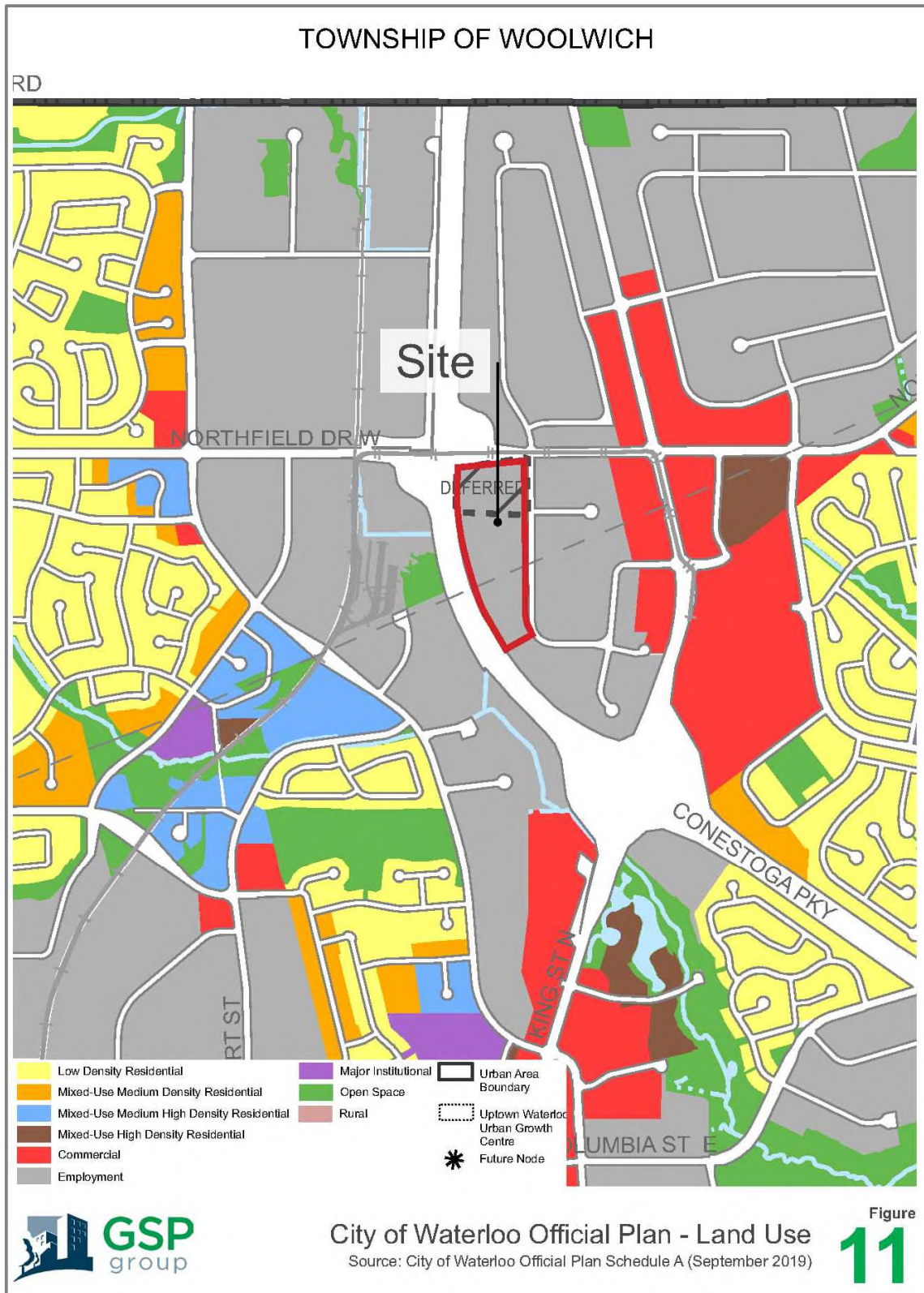
*“The site is unique because of its large size and proximity to the rapid transit stations proposed at Conestoga Mall, and at Northfield Drive near Parkside Drive. These features may provide an opportunity to redevelop all or part of the site with transit supportive uses. To assess the potential, the City has requested the Region to defer the City’s Official Plan as it relates to the subject lands, recognizing that the site is intended to be used primarily for employment purposes. City staff anticipates that a deferral will be resolved through a master planning exercise undertaken by the landowner in consultation with the City and the Region<sup>1</sup>.”*

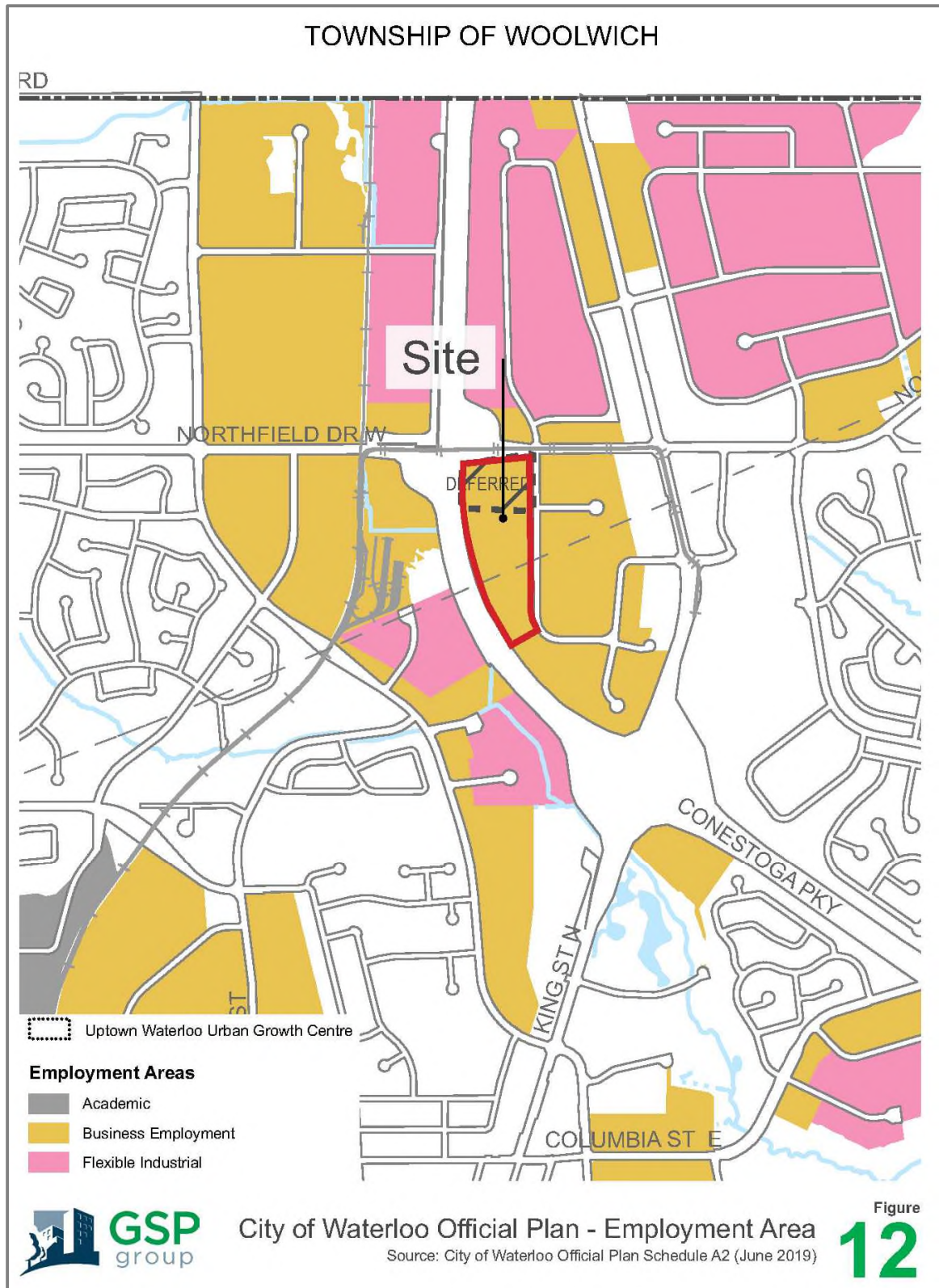
In 2016-17, the City of Waterloo undertook the Light Rail Transit Station Area Planning exercise. During that process, the Owner submitted a future vision for the redevelopment of the Site contemplating the change in use. The City’s LRT Station Planning process was halted by the new Growth Plan (July 1, 2017), wherein the Province would not allow “employment land conversions” without a Municipal Comprehensive Review by upper tier municipalities (i.e., the Regional Municipality of Waterloo). As a result, only a partial implementation of the LRT planning process was applied. The northerly one-third of the Site remained “DEFERRED”.

The balance of the Site is designated for Business Employment purposes (**Figures 11 and 12**). The Site is located within the Conestoga iON Station Area and the Northfield iON Station Area, both of which are intended to accommodate a mix of medium and high density residential, commercial and employment uses, in accordance with the recent planning policy framework for rapid transit stations.

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<sup>1</sup> Region of Waterloo – Planning, Housing and Community Services, Community Planning Division, Staff Report P-12-115, November 6, 2012





The Northfield Drive frontage of the site is identified as a Minor Node (DEFERRED) in the OP. As per Policy 3.6.1(3), Minor Nodes are planned as medium to medium-high density mixed-use areas that accommodate a range of uses, including residential, commercial, employment, social, cultural, recreational, and institutional uses.

*Response: Minor Nodes are intended to be medium to medium-high density mixed-use areas that include a range of uses of uses, including residential, commercial, employment, social, cultural, recreational, and institutional uses. The northern portion of the Site was DEFERRED by both the City and Region to allow for further consideration and review of appropriate land uses recognizing that the intent was to provide for a broader range of intensive uses that are transit-supportive while retaining employment uses as a key component of future development. Planning commentary and justification related to the retention of employment uses as part of the Proposed Development is provided in Section 7.3 of this Report.*

*Note that only the northern portion of the Site remains DEFERRED. It is our opinion that the deferral should have continued to be applied to the property in its entirety to allow for the preparation of a comprehensive Master Plan.*

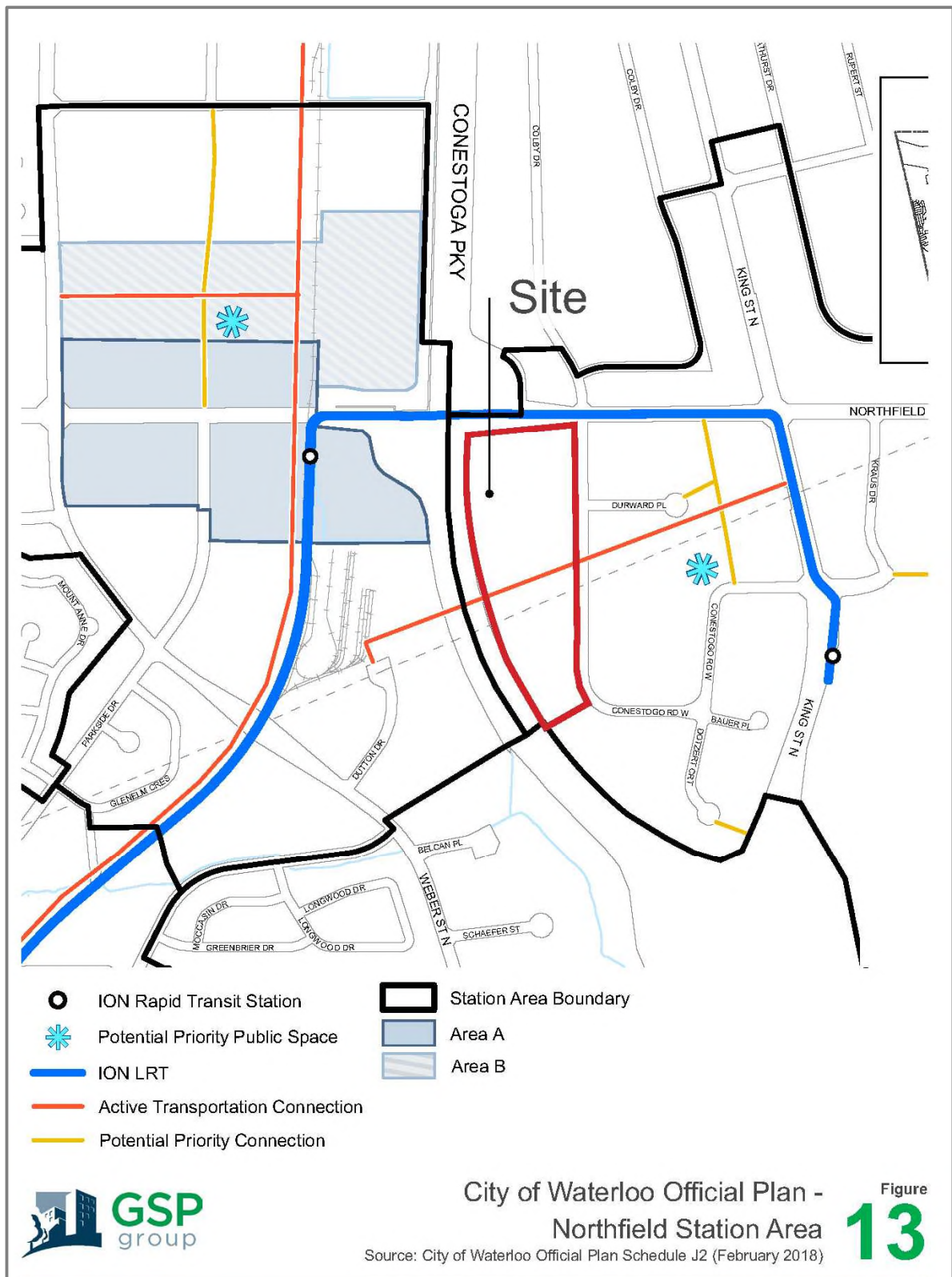
The Site is located within the Conestoga iON Station Area (**Figure 13**). In accordance with Policy 3.8 (1), Major Transit Station Areas will be planned to:

- a) Achieve, by 2041 or earlier, a minimum gross density target of 160 residents and jobs combined per hectare, which will be achieved by:
  - i. Establishing minimum residential and non-residential densities in the Zoning By-law;
  - ii. Requiring *development* applications, excluding applications for *site plan* approval, for lands located within Area A and Area B on Schedules 'J1' to 'J5' which propose densities lower than the minimum density established in the Zoning By-law to provide an appropriate and accepted rationale through a Planning Justification Report, demonstrating how future phases of development will achieve the minimum density targets.
- b) Accommodated a mix of transit supportive land uses that create both origins and destinations for transit users;
- c) Be focal points for active transportation networks, with connections to other destinations;
- d) Support the unique character of each of the station areas and create attractive places for working, learning, living and recreation;

- e) Stimulate new investment and promote economic development by encouraging new job growth and commercial vitality;
- f) Support place-making through public and private realm improvements, public art, new open spaces, and enhanced amenity;
- g) Support connectivity, integration, and transfers between mobility systems.

Response: Located within the Conestoga iON Station Area, the Proposed Development satisfies the requirements of Policy 3.8 (1) as follows:

- a) *Proposed Zoning By-law Amendment to include minimum density requirements for both residential and non-residential uses to promote higher-density, mixed-use development of the Site. The proposed redevelopment scheme will assist the City in achieving the density targets established for Major Transit Station Areas.*
- b) *A mix of residential, employment, commercial and community uses will serve as live/work options for future residents and will also provide transit-accessible employment and commercial opportunities and destinations for residents of the broader community.*
- c) *As noted previously, the proposed redevelopment of the Site will include an extensive on-site pedestrian network providing connections to existing pedestrian and cycling facilities on Northfield Drive and Conestogo Road as well as creating an additional pedestrian connection to the Northfield iON Station.*
- d) *The Master Plan has been designed to provide for sufficient separation and distancing between future buildings and structures to reduce privacy and screening impacts and includes strategically placed open spaces, courtyards, and amenity spaces, resulting in an overall attractive and welcoming urban neighbourhood.*
- e) *With a total employment gross floor area of approximately 20,204 m<sup>2</sup> and a projected employment population of 759.78 people, the proposed development significantly increases the opportunities for commercial and employment jobs.*
- f) *With an extensive network of open spaces, pedestrian connections, parkades and the promenade, future residents and members of the public will have access to a variety of new open spaces and enhanced amenity areas.*
- g) *The on-site pedestrian and cycling facilities are appropriately linked to off-site pedestrian and cycling facilities. Furthermore, the location of the Site and its proposed direct access to the Northfield iON Station provides for direction connections to existing LRT and GRT services in Waterloo.*



The Site is currently designated as Business Employment where “*prestige office uses are the predominant use of land*” (Policy 10.3.2.2). Prestige office uses and other light industrial and business employment uses are directed towards planned or existing transportation routes and in higher density destinations, such as the subject Site.

Policy 10.1.1(12) of the OP contemplates development applications proposing to redesignate land to mixed-use medium and high-density residential uses. Such changes may be contemplated in accordance with the following:

- a) The proposed density is deemed appropriate for the neighbourhood and contributes to an appropriate height and density transition by buffering or being buffered from land designated as Low Density Residential;
- b) There is a demonstrated community benefit associated with the additional medium, medium-high or high density uses to accommodate additional population in the context of Waterloo’s population forecast and the supply of lands within existing designated Nodes and Corridors;
- c) Lands are proposed to be located within a designated Node or Corridor and satisfy all the relevant policies of the City Form Chapter;
- d) The proposal achieves the applicable performance standards set out in this Official Plan and implementing Zoning By-law;
- e) Surface parking is minimized in favour of more intensive forms of parking;
- f) Cultural heritage resources are conserved;
- g) The propose demonstrates a high standard of urban design;
- h) The proposal identifies and implements any required transportation improvements, with focus on transportation demand management measures;
- i) Medium to high density residential uses are located with direct vehicular access to arterial or collector roads to the extent possible...;
- j) Infrastructure capacity is not exceeded.

*Response:* *The Official Plan and Zoning By-law Amendments propose to establish permissions for mixed-use residential development on the northern portion of the Site while maintaining the existing permissions for employment uses on the southern portion of the Site (south of the WNH Corridor). In respect of the above-noted policies pertaining to the establishment of mixed-use residential uses, the proposed development:*

- a) *Will result in an approximate density of 497 residents and jobs per hectare, whereas the previous use of the Site by Kraus Group of Companies had an approximate density of 42 jobs per hectare at its most productive employment level*

*(of 450 jobs). The proposed business employment and offices uses are situated on the southern portion of the Site and separated from the proposed residential uses by the existing WNH Corridor and proposed surface parking facility, providing an appropriate buffer between the proposed development and the existing business employment uses located to the east of the Site.*

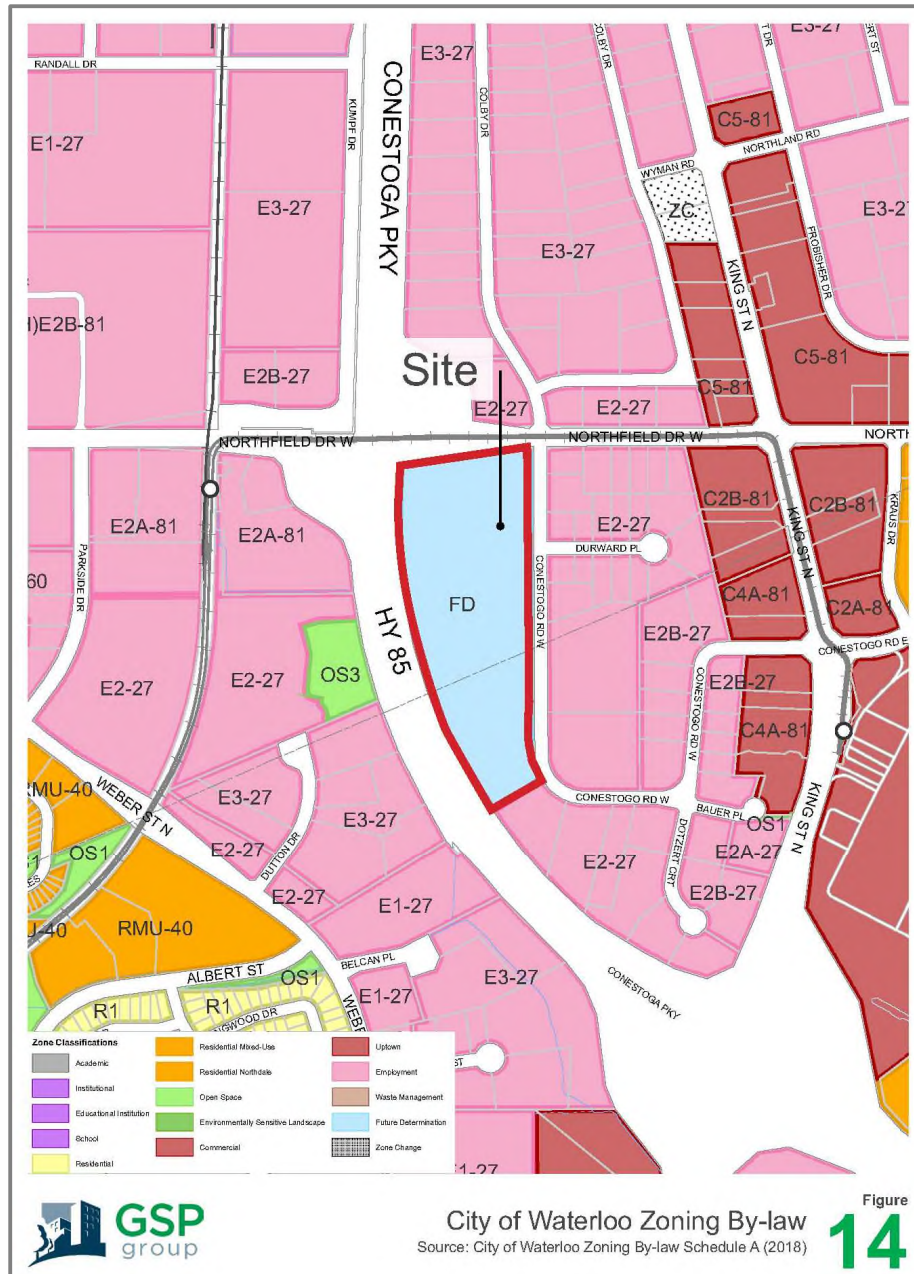
- b) Will establish a broad range of new residential, employment, commercial, community and open space uses that will benefit future residents of the Site as well as residents of the broader community.*
- c) Is located with an identified Node as well as the Conestoga iON Station Area and immediately adjacent to the Northfield iON Station Area. As demonstrated above, the proposed redevelopment of the property conforms with policies 3.6.1(3) (Minor Nodes) and 3.8(1) (Major Transit Station Areas).*
- d) Demonstrates conformity with the Official Plan as detailed throughout Section 6.5 and 7.2 of this Report. Proposed Official Plan and Zoning By-law Amendments include site specific standards to reflect the mixed-use, high density and transit-oriented principles of the proposed development.*
- e) Includes reduced parking rates as part of proposed Official Plan and Zoning By-law Amendments in recognition of the Site's access to a range of transportation options, including pedestrian and cycling facilities, transit, and LRT services.*
- f) Not applicable.*
- g) Refer to Urban Design Report.*
- h) Includes several intersection and access improvements on Conestogo Road, including its intersection with Northfield Drive and King Street (see Section 5.3 and **Figure 10** of this Report).*
- i) Will have six direct vehicular access points to Conestogo Road to serve the various phases of future development, which provides indirect access to Northfield Drive and King Street North.*
- j) Will be serviced by existing municipal infrastructure and services, as confirmed by the Functional Servicing & Stormwater Management Report prepared by Walter Fedy (refer to Section 5.1 of this Report).*

In summary, the proposed development conforms with the policies of the Official Plan as outlined and summarized in the above-noted commentary.

Policies 10.3.1(4) to 10.3.1(10) of the OP speak to the protection and conversion of employment lands and contain specific policies that speak to employment land conversion within Major Transit Station Areas. These policies will be discussed in detail in Section 7.3 of this Report.

## 6.5 City of Waterloo Zoning By-law

The Site is zoned Future Determination in the City of Waterloo Zoning By-law No. 2018-50, which permits uses and buildings that legally existed on the effective date of the by-law (**Figure 15**) with future land uses to be determined through a subsequent Zoning By-law Amendment.



## 7. Scoped Employment Land Conservation Analysis

The Site is located within an employment area as identified in the Official Plan. The PPS, Growth Plan, ROP and Official Plan all contain policies that encourage the retention of employment areas dedicated to primary employment uses to ensure local and regional competitiveness and stability. If employment lands are proposed to be converted to non-employment uses, the existing Provincial, Regional, and local municipal policy framework requires a thorough and comprehensive review of the need for and impacts of the proposed conversion.

However, the existing policy regime focuses on the removal of land from employment area through a conversion to non-employment uses, resulting in the net loss of employment land for current and future populations. The proposed development includes the retention of employment uses at a significantly intensified density while introducing a mix of other land uses, such as commercial, residential, community and open space uses, to create a complete and livable community.

The following provides planning justification and commentary in the context of an employment land conversion based on the proposed mixed-use development including the creation of significant employment population. Please note the following commentary is intended to be reviewed and assessed in conjunction with the comprehensive Regional Official Plan Review currently being undertaken by the Region, including an employment land assessment and review of employment land conversion requests.

### 7.1 Provincial Policy Statement

The PPS contains policies that promote economic development and competitiveness by encouraging a mix and range of employment uses. These policies are intended to protect and preserve employment areas for current and future employment opportunities. The following provides an overview of these policies as they relate to the proposed development, which combines residential, employment, commercial, community and public space uses.

Policy 1.3.2.2 states that employment areas planned for industrial or manufacturing uses shall provide for separation from sensitive land uses. Policy 1.3.2.3 further prohibits residential uses and other sensitive uses within employment areas planned for industrial or manufacturing uses.

*Response: The Site and surrounding properties are not contemplated for traditional industrial and manufacturing uses. The current Business Employment designation anticipates “the predominant use of land to be prestige office uses” and generally limits the range and types of industrial and employment uses on the Site to include low impact and high-tech related manufacturing and repair services, offices, medical clinics, data centres, training facilities, printing and publishing and parking facilities. The nature of the permitted Business Employment uses surrounding the Site will have limited impact on some of the sensitive uses included as part of the Proposed Development, and vice versa. In addition, the Official Plan and Zoning By-law Amendments propose to restrict the types of sensitive uses permitted in proximity to properties designated Business Employment to eliminate future potential land use conflicts.*

Policy 1.3.24 permits the conversion of land within employment areas to non-employment uses through a comprehensive review to demonstrate that the land is not required for employment purposes in the long-term.

*Response: The proposed redevelopment of the property does not propose the removal of employment land from a designated employment area, but rather seeks permissions for mixed-use development that would retain the employment permission on a portion of the Site, resulting in significantly intensified employment uses and population on the Site. The intent of the Official Plan and Zoning By-law Amendments are to establish mixed-use, medium and high-density residential uses on the northern portion of the Site and maintaining the existing Business Employment designation on the southern portion of the Site, to be considered in conjunction with the comprehensive ROP review currently being undertaking by the Region, which includes an employment land assessment. The comprehensive ROP Review in the context of the Official Plan and Zoning By-law Amendments is discussed in detail in Section 7.3.1 of this Report.*

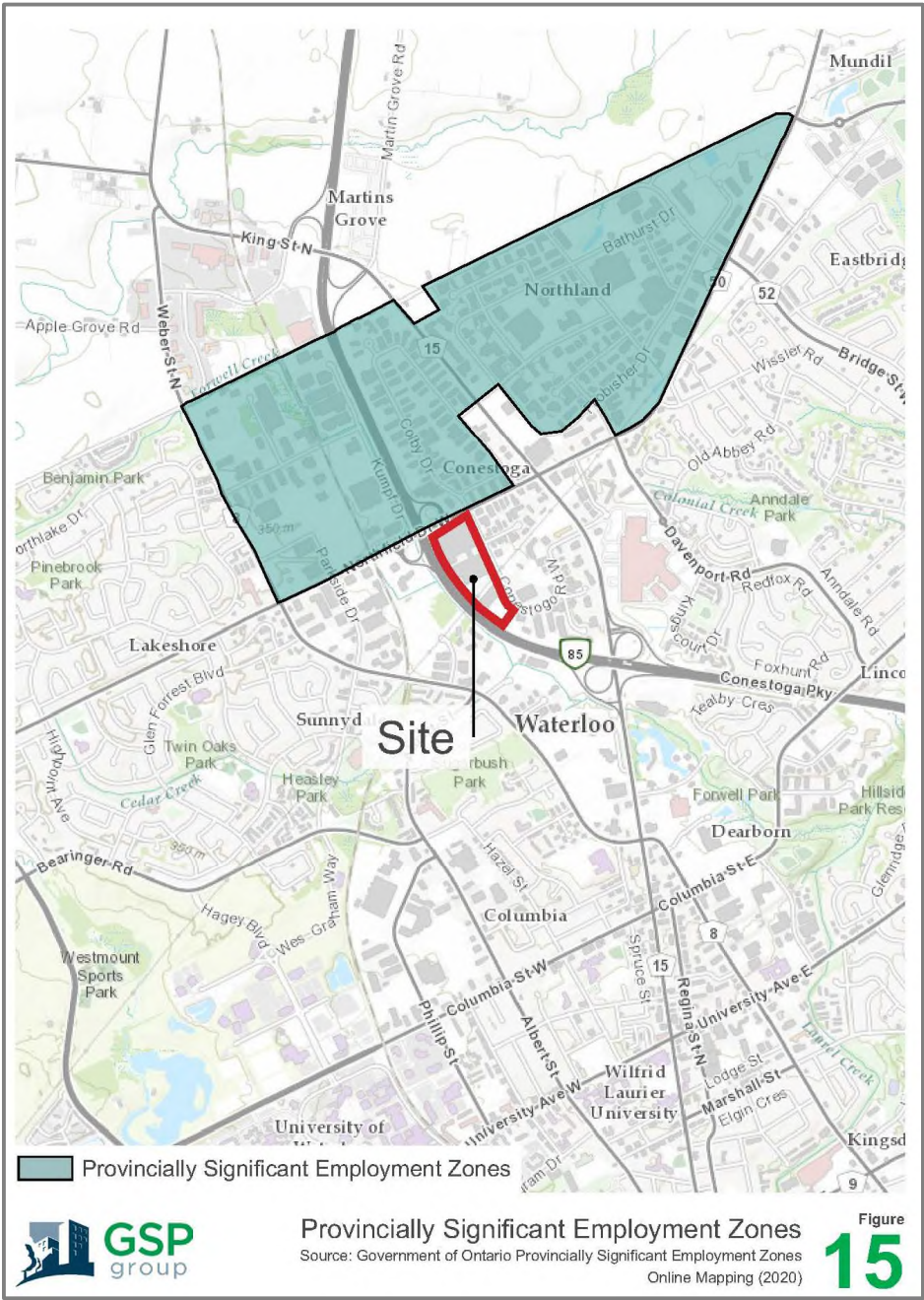
Policy 1.3.2.5 further states that lands within existing employment areas may be converted to a designation that permits non-employment uses provided that the land is not identified as provincially or regionally significant employment lands, and subject to the following:

- a) There is an identified need for the conversion and the land is not required for employment purposes over the long term;
- b) The proposed uses will not adversely affect the overall viability of the employment area;
- c) Existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.

Response: The Province has a compiled a map of provincially significant employment areas for all municipalities, which align with municipal official plans and the identification of local employment areas (Available at: <https://www.ontario.ca/page/provincially-significant-employment-zones>); the Site has not been identified as a provincially significant employment area, as shown on **Figure 15**. The proposed development satisfies Policy 1.3.2.5 of the PPS as follows:

- a) *It does not include the removal of the entire property from the existing City of Waterloo employment land supply but rather seeks to establish residential, commercial, community and open space use permissions on a portion of the Site while maintaining some existing employment use and office permissions. The existing building and structures on the Site were previously used for employment purposes with a peak employment population of approximately 450 persons or 42 persons per hectare. The Proposed Development includes a total of 18,216 m<sup>2</sup> of future office space and 1,988 m<sup>2</sup> of commercial space with a total employment projection of approximately 759.78 persons (not including work-from-home employment projections). This equates to an employment only population on the 10.7 hectare site of approximately 71 jobs per hectare. The previous use of the property with a peak of 450 employees equated to approximately 1 employee per 237.7 m<sup>2</sup> of employment gross floor area, whereas the 759.78 employment and commercial jobs associated with the proposed development would equate to 1 employee per 26.6 m<sup>2</sup> of employment gross floor area. The addition of residential, community, commercial and open space uses while maintaining employment uses greatly enhances the potential of the Site to achieve the high density, mixed-use development objectives of land located within a Minor Node and Major Transit Station Area.*
- b) *The surrounding properties are designated as Business Employment in the Official Plan, which permits prestige office uses as a predominant use and a range of low impact, tech-related business and offices uses that are compatible. Uses permitted within the Business Employment designation would generally be considered Class 1 Industrial Uses in accordance with the D-6 Guidelines for Compatibility Between Industrial Facilities and Sensitive Uses, which requires a minimum separation of 70 metres between industrial and sensitive uses that is accommodated in the Proposed Development. In addition to the limited range of uses permitted in the Business Employment designation, the Official Plan and Zoning By-laws Amendments include restrictions on the types of sensitive land uses that may be permitted proximate to surrounding businesses to further reduce any potential compatibility issues.*
- c) *The Site is serviced by existing municipal water, wastewater and stormwater services on Northfield Drive and Conestoga Road. As noted in Section 2.3 of this Report, the Site has access to a range of public and community service facilities existing in the broader community.*

In summary, the proposed development is consistent with the policies and objectives of the PPS related to employment areas as demonstrated in the above-noted commentary.



## 7.2 Places to Grow: Growth Plan for Greater Golden Horseshoe

Like the PPS, the Growth Plan contains policies that encourage economic development and competitiveness by making efficient use of existing employment areas and ensuring the availability of sufficient land for a variety of existing and future employment uses. The following provides a summary and analysis of the employment land policies of the Growth Plan as they relate to the Proposed Development.

Policy 2.2.5.8 states that sensitive land uses, major retail or major office uses will avoid, or minimize and mitigate adverse impacts on industrial, manufacturing, or other uses that are particularly vulnerable to encroachment.

*Response: The Official Plan and Zoning By-law Amendments include provisions to limit the location of sensitive uses, such as daycares, places of worship and community uses, proximate to surrounding lands designated Business Employment. Furthermore, the Business Employment designation does not permit general or traditional industrial manufacturing uses but rather limits the range of permitted uses to low-impact office and high-value technology related uses that generally have little to no impact on surrounding land uses.*

Policy 2.2.5.9 states that lands within employment areas can be converted to non-employment uses through a municipal comprehensive review where it is demonstrated that:

- a) there is a need for the conversion;
- b) the lands are not required over the horizon of the Plan for the employment purposes for which they are designated;
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;
- d) the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as other policies of this Plan;
- e) there are existing or planned infrastructure and public services facilities to accommodate the proposed use.

*Response: As noted above and discussed in Section 7.3.1 of this Report, the Region is currently undertaking a municipal comprehensive review of the ROP, which includes an assessment of employment land needs. In accordance with the recent recommendation of the Region to include a convert the northern portion of the Site to non-employment uses (Regional Report PDL-CPL-21-16), the proposed development demonstrates the following*

consideration of Policy 2.2.5.9, to be considered conjunction with the comprehensive Regional Official Plan Review currently being completed by the Region:

- a) *The Site is located within a Minor Node and the Conestoga iON Station Area and is proximate to the Northfield iON Station; the Proposed Development includes a direct pedestrian connection to the Northfield iON Station located on the west side of Conestoga Parkway. The objective of future development as identified in all Provincial, Regional and City planning documents is to provide for intensified, mixed-use development of a compact form in such areas. The Growth Plan explicitly states that Major Transit Station Areas should be planned to provide for diverse mix of uses to support existing and planned transit levels within 800 metres of stations. The current designation of the Site and surrounding properties as Business Employment anticipates the predominant use to be “prestige office” and only permits a limited range of other employments uses. The overall density of the development for employment population is anticipated to be 759.78 jobs or a density of 71 jobs per hectare (including work from home projections). This will assist in achieving the target of a minimum 160 residents and jobs per hectare through within this Major Transit Station Area. The addition of residential, commercial, community and open space uses to the business employment uses permitted on the southern portion of the Site is needed to achieve the policy goals and objectives for growth and development in Major Transit Station Areas, wherein the combined employment and residential population is expected to be 5,320.98 persons (497 people and jobs per hectare).*
- b) *As part of the comprehensive Regional Official Plan Review recently initiated by the Region, mapping has been prepared to identify all existing employment areas throughout the City of Waterloo (Available at: <https://www.engagewr.ca/regional-official-plan/maps/identifying-employment-areas>). As identified on **Figure 16**, large existing employment areas have been identified around the University of Waterloo, the north end of Waterloo on the east and west side of the Conestoga Parkway (including the subject Site) and the northwest side of the City, between Northfield Drive/University Avenue and Bridge Street. With an overall approximate land area for the City of Waterloo of 6,615 hectares, existing employment areas and properties comprise approximately 1,150 ha (equivalent to approximately 17.4% of total land area). With a site are of 10.7 hectares, the conversion of the entire Site from a traditional business employment property to a mixed-used development that includes business employment uses would have equated to the removal of approximately 0.9% of all land dedicated to traditional employment uses in the City of Waterloo. As recommended by the Region (Regional Report PDL-CPL-21), the northern portion of the property has been recommended to be considered for non-employment uses; with an area of 7.27ha, this equates to 6% of all land dedicate to traditional employment uses just in the City of Waterloo. The Proposed Development does not technically*

*include the removal of employment uses and associated gross floor area; rather, it will result in a denser, intensified employment opportunities, along with residential and commercial opportunities, by comparison to its previous business employment use.*

- c) *The City of Waterloo has previously indicated that there were sufficient development opportunities to accommodate future employment capacity in the short (0-5 years), medium (5 to 15 years) and long-term (up to 2031), based on the existing planning policy framework.<sup>2</sup> The Region of Waterloo currently has an overall office vacancy rate of 6.3%<sup>3</sup>, which reconfirms the City's previous indications regarding employment land capacity. (Note: The Site is designated as Business Employment, which limits traditional industrial uses in favour of office and tech-related uses). The current vacancy rates suggest there is still sufficient opportunities to accommodate current employment growth. With an increase in the unemployment rate since late 2019<sup>4</sup>, the most recent employment statistics for Ontario suggests a recent decrease in employment growth and likely a related decrease in demand for office and employment space. While the proposed development only provides for approximately 20,204 m<sup>2</sup> of combined office and commercial space, which is less than 81,000 m<sup>2</sup> employment area associated with the former Kraus operations, it will result in a density of 71 jobs per hectare by comparison to 42 jobs per hectare (former Kraus operations). The proposed development will accommodate forecasted employment growth through reduced land consumption, presumably having little to no impact on current and future employment land supply.*
- d) *The Site is located within an area designated as Business Employment, which permits a limited range of tech-related business and offices uses that are generally less impactful in nature and would generally be classified as Class I with some Class II Industrial Uses. The Official Plan and Zoning By-laws Amendments to permit mixed-use high-density residential uses on the norther portion of the Site includes restrictions on the types of sensitive land uses that may be permitted proximate to surrounding businesses to further reduce any potential compatibility issues between the proposed mixed-used development and surrounding employment uses. To allow for the continued use of the entire Site for Business Employment uses without the additional mix of residential and commercial uses as proposed would negatively impact the ability of the property or general area to achieve the intensification and density targets as established by the Growth Plan for Major Transit Station Areas. As noted by the Region, the existing WHN Corridor provides for a natural divide between the northern*

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<sup>2</sup> City of Waterloo Report IPPW2016-100. "Station Area Planning – Official Plan Amendment 14 and Zoning By-law Z-16-15. Date: December 5, 2016. Integrate Planning & Public Works.

<sup>3</sup> CBRE. Waterloo Region Office Q2 2020 Report.

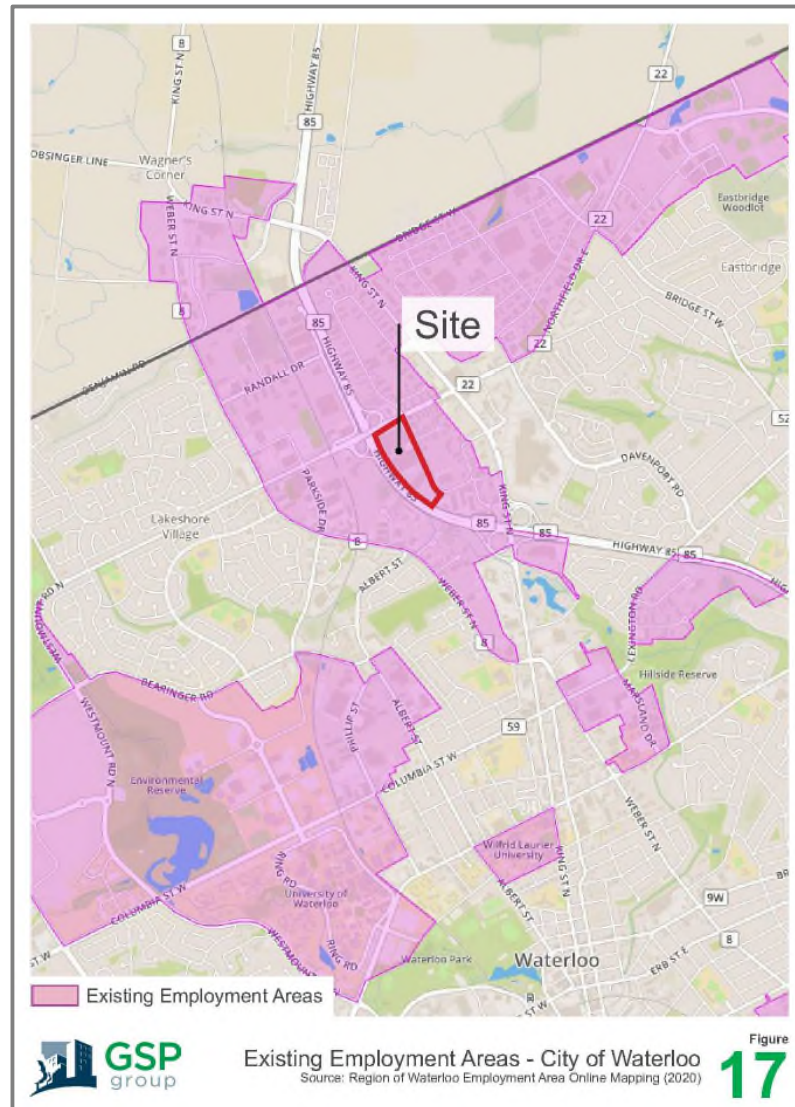
<sup>4</sup> Ontario Labour Market Report, May 2020. Available at: <https://www.ontario.ca/page/labour-market-report-may-2020>

*and southern portion of the Site, allowing opportunities for the Northfield Drive frontage to be considered for non-employment uses while maintaining the Business Employment designation on the southern portion of the property and preventing the intrusion of non-employment uses within the broader surrounding employment area<sup>5</sup>.*

- e) *The Site is serviced by existing municipal water, wastewater, and stormwater services as well as a range of public and community service facilities existing in the broader community.*

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<sup>5</sup> Region of Waterloo Report PDL-CPL-21-16. “Regional Official Plan Review – Employment”. Date: April 20, 2021. Planning, Development and Legislative Services.



Policy 2.2.5.10 further states that employment land conversions to non-employment uses may be contemplated outside of a municipal comprehensive review provided the conversion would:

- a) satisfy the requirements of Policy 2.2.5.9 a), d) and e);
- b) maintain a significant number of jobs on those lands through the establishment of development criteria;
- c) not included any part of an employment area identified as a provincially significant employment zone.

*Response: At the height of its productivity, the Kraus Group of Companies had a maximum number of 450 employees on the Site, which equated to an employment density of approximately 42 jobs per hectare. With respect to (b), the proposed development will result in approximately 759.78 combined office employment and commercial jobs, which equates to an employment only density of 71 jobs per hectare, a moderate increase over the previous employment density. With respect to (c), the Site is not located within an employment area identified as a provincially significant employment zoned (refer to **Figure 16**).*

In summary, the proposed development conforms with the employment area and conversion policies of the Growth Plan for the reasons and justification provided above.

### **7.3 Regional Official Plan and City of Waterloo Official Plan**

It is the intent of the ROP and City of Waterloo Official Plan to maintain a diverse and balanced employment land supply to service the needs of residents and ensure there are sufficient employment areas to accommodate employment growth. The current policies of the Official Plan do not contemplate commercial, institutional, and residential land uses in employment areas, with the exception of ancillary uses.

Both the ROP and Official Plan state that Area Municipalities may permit the redesignation of land within existing employment areas to non-employment uses through a municipal comprehensive review where it has been demonstrated that:

- a) there is a need for the redesignation;
- b) the Area Municipality will meet the employment forecasts allocated to it pursuant to this Plan;

- c) the redesignation will not adversely affect the viability of the subject employment area, and achievement of the reurbanization target, density target and other policies of this Plan;
- d) there is existing or planned infrastructure to accommodate the proposed redesignation;
- e) the lands are not required over the long-term for the employment purposes for which they are currently designated;
- f) cross-jurisdictional issues have been considered (ROP Policy 4.A.5; Official Plan Policy 10.3.1(7)).

*Response: The proposed Official Plan Amendment is consistent with the recommendations of the Region pertaining to the conversion of a portion of the Site to non-employment uses (Regional Report PDL-CPL-21-16) and is intended to be reviewed concurrently with the comprehensive Regional Official Plan Review being undertaken by the Region; the intent of the Official Plan Amendment is to not initiate a private comprehensive review of employment land but rather align with the municipal comprehensive review and recommendations of the Region. Please refer to Section 7.2, Policy 2.2.5.9 response above with respect to a) to e). With respect to f), there are no cross-jurisdictional considerations associated with the Proposed Development, which will be serviced by existing City of Waterloo municipal infrastructure, and public and community services.*

Policy 10.3.1(8) of the Official Plan states that to support employment focused Major Transit Station Areas, priority consideration for conversion of employment areas, if warranted through the municipal comprehensive review initiated by the Region, will be given to:

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

Response: The Site has direct vehicular access to Conestogo Road as well as pedestrian and cycling access to Northfield Drive and Conestogo Road. Furthermore, the proposed development includes a direct pedestrian connection to the Northfield iON Station for future residents as well as the broader community. Broadening the mix and range of uses permitted on the Site beyond business employment uses greatly increases potential ridership at this location along a higher-order transit corridor. Paradigm Transportation Solutions Limited Traffic Impact Study and Transportation Demand Management Report anticipates the Site to generate approximately 3,500 LRT trips per day.

Policy 10.3.1(9) of the Official Plan states that where an employment land conversion occurs through a municipal comprehensive review, the implementing Official Plan framework to facilitate the conversion would include:

- a) Appropriate minimum employment densities required to be development on conjunction with non-employment uses;
- b) Built form requirements, including requirements for development to feature mixed-use buildings;
- c) The permitted heights and densities;
- d) Requirements to ensure that any new sensitive uses are appropriately phased based on the surrounding land use context. Permission for sensitive uses may require the application of a holding provision.

Response: The proposed development is a large-scale, mixed-use development combining residential, office, commercial, community and open space uses, both in individual buildings and across the project in its entirety. With buildings heights ranging from 3 to 35-storeys and an overall projected density of approximately 497 persons and jobs per hectare, the Official Plan and Zoning By-law Amendments will ensure that future development achieves the intended high-density, compact development envisioned for the Site. Finally, the proposed amendments provide for restrictions for sensitive use, reducing potential impacts of the proposed development on surrounding employment uses.

Policy 10.3.1(10) of the Official Plan further states that new residential development shall be discouraged from locating close to land designated as Flexible Industrial.

Response: The surrounding properties are designated as Business Employment in the Official Plan, which are generally low-impact, tech-related employment uses and offices.

In summary, the Proposed Development conforms with the employment area and conversion policies of the ROP and Official Plan based on the above-noted commentary.

### 7.3.1 Regional Official Plan Review – Employment Land Conversion

The Region of Waterloo initiated the formal comprehensive review of the Regional Official Plan in August 2018 (the “ROP Review”). The purpose of the ROP Review was to update policies to have regard for matters of provincial interest, be consistent with the 2014 (and now 2020 PPS), and to bring the ROP into conformity with the Growth Plan<sup>6</sup>. The ROP Review is intended to include a Municipal Comprehensive Review as specified by the Growth Plan and will include a variety of background studies, including but not limited to an employment strategy.

As part of the ROP Review, the Region is completing a land needs assessment that will be used to inform the designation of new and/or the conversion of existing employment lands, which would include the assessment of employment lands that may be better suited for non-employment uses. In June 2020, the Region invited landowners to submit requests for properties that are currently designated for employment uses to be converted to non-employment uses. All requests are to be reviewed and evaluated in accordance with the following conversion criteria:

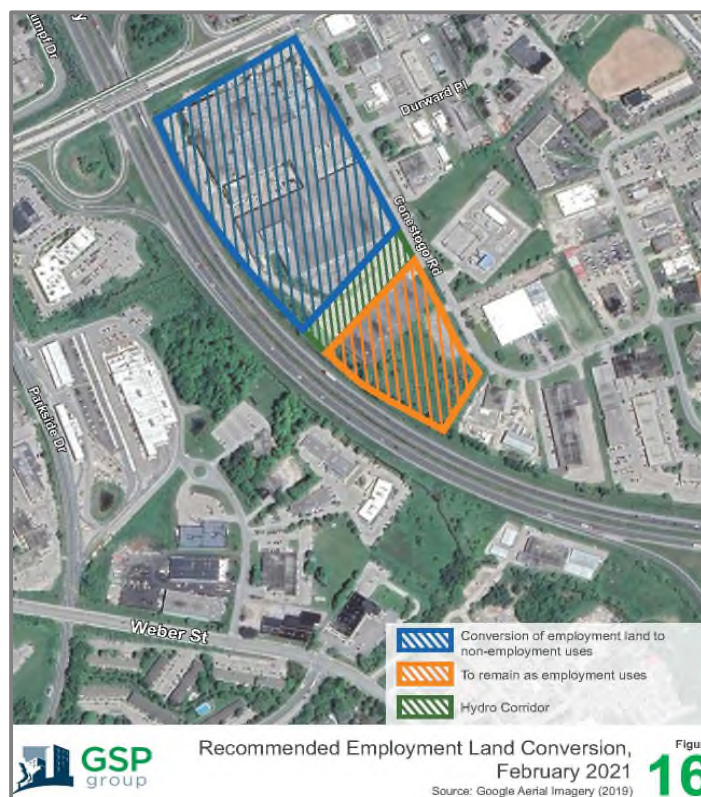
- 1) there is a need for the conversion;
- 2) the lands are not required over the horizon of the Growth Plan for the employment purposes for which they are designated;
- 3) the Region and Area Municipalities will maintain sufficient lands to accommodate forecasted employment growth to the horizon of the Growth Plan;
- 4) the proposed use would not adversely affect the overall viability of the Employment Area;
- 5) the proposal would not adversely affect the achievement of the minimum intensification targets and density targets;
- 6) there is existing or planned infrastructure and public service facilities to accommodate the proposed conversion;
- 7) cross-jurisdiction issues have been addressed;
- 8) the site does not have particular or special employment use appeal based on its proximity to major transportation infrastructure;
- 9) the conversion shall support existing or planned Regional or Area Municipal planning objectives.

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<sup>6</sup> Region of Waterloo Report: PDL-CPL-18-333. “Regional Official Plan Review”. Date: August 14, 2018. Planning, Development and Legislative Services, Community Planning.

In correspondence dated July 30, 2020, Northfield Properties LP requested that the Site be considered for conversion to include non-employment uses along with employment uses. Regional Report PDL-CPL-21-16, as presented to Regional Council on April 20, 2021, included recommendations for approval and partial approval of employment land conversion requests. Identified as Property Wat-11, Regional staff recommended that the northern portion of the Site (north of the WNH Corridor) be considered for future non-employment land uses while the southern portion of the Site (south of the WNH Corridor) remain designated for employment and office purposes (refer to **Figure 17**).

Northfield Properties LP has expressed their desire to have the Site considered for future mixed-used development since the creation of the new Official Plan in 2012, given its proximity to the Northfield and Conestoga iON Stations. Northfield Properties LP confirmed their intent to develop a mixed-use community on Site with their July 30, 2020 submission to the Region as part of the comprehensive ROP Review process formally requesting the consideration of permissions for a range of non-employment on the property. The proposed development of the Site and associated Official Plan and Zoning By-law Amendments are consistent with the employment land assessment and recent recommendations of the Region with respect to the establishment of non-employment land use permissions on a portion of the property.



## 8. Conclusion

GSP Group Inc. was retained by Northfield Properties LP to assist with land use planning approvals for the property 525 to 565 Conestogo Road West. The site, which is 10.7 hectares in size, was formerly used by the Kraus Group of Companies as their international head office and manufacturing facilities, including Strudex Fibres (manufacturing dyed fiber materials) and Kraus Carpets (manufacturing broadloom carpets) and is currently occupied by two former industrial buildings with a total gross floor area of approximately 81,000 m<sup>2</sup>.

Northfield Properties LP is proposing to redevelop the site as a mixed-use community containing employment, residential, commercial, community and open space uses. The proposed redevelopment includes a total of 8 future developments blocks connected by internal driveways, walkways, and courtyards with medium and high-density mixed-use buildings ranging in size from 3- to 35-storeys atop an expansive underground parking structure; high density mixed use residential situated on the northern portion of the Site (north of the WMH Corridor) and business employment office uses maintained on the southern portion of the Site (south of the WNH Corridor). The proposed redevelopment scheme also includes a pedestrian promenade extending along the Conestoga Expressway providing a direct connection to the Northfield iON Station.

The site is designated for business employment purposes and is located within the Conestoga iON Station Area and adjacent to the Northfield iON Station Area, both of which are intended to accommodate a mix of medium and high density residential, employment and commercial uses, in accordance with the recent planning policy framework for rapid transit stations. Applications for an Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision are required to permit a mix of commercial and residential uses on a portion of the Site, while maintaining permissions for business employment uses on the balance of the property. The proposed applications are consistent with the recommendations in Regional Report PDL-21-16 regarding the consideration of non-employment uses for a portion of the Site and should be reviewed concurrently with the ongoing Municipal Comprehensive Review for the Regional Official Plan currently.

It is our professional planning opinion that the proposed applications and redevelopment scheme are justified and represent good planning. As demonstrated in Sections 6.0 and 7.0 of this Report, the proposed redevelopment is consistent with the Provincial Policy Statement and conforms to the Growth Plan for the Greater Golden Horseshoe, Regional Official Plan and City of Waterloo. As per the applicable planning policy framework, the proposed redevelopment will:

- Result in the redevelopment and employment intensification of an underutilized former traditional employment site located within the Built-Up Area and proximate to two existing Major Transit Station Areas;
- Provide for a complete, medium- to-high density mixed-used land use pattern that combines residential, office, commercial, community and open space uses;
- Accommodates a compact, more dense form of urban development that will make efficient use of existing municipal services immediately surrounding the Site as well as the range of existing community services available in the broader community;
- Supports the use of the surrounding local transit system through the establishment of high density, transit-supportive uses within 800 metres of the Conestoga and Northfield iON Stations and existing Grand River Transit Services;
- Creates an internal transportation network consisting of private driveways, sidewalks, trails, and open space areas connected to surrounding facilities, including a proposed pedestrian connection directly to the Northfield iON Station;
- Provides for a diverse range of housing options in terms of size, types, tenure, and density, including future considerations for affordable housing; and
- Satisfies the existing Provincial, Regional and City policy considerations for the conversion of employment lands.

Prepared by:

*Kristen Barisdale*

Kristen Barisdale, MCIP, RPP  
Senior Planner

*Chris Pidgeon*

Chris Pidgeon, MCIP, RPP  
President

## **APPENDIX A:**

Record from January 20, 2020  
Pre-Consultation Meeting

## Record of Pre-submission Consultation

The purpose of the Pre-submission Consultation Meeting is to review a proposed development application and identify the need for, and scope of, the *other information and materials* necessary for a thorough review of the development application. This Record of pre-submission consultation documents the required *other information and materials* that must be submitted in conjunction with the application form and fees. It will be used by Planning Staff in determining whether the application is complete.

**Owner:** Northfield Properties LP

**Applicant/Agent:** Chris Pidgeon/Kristen Barisdale, GSP Group Inc.

**Project Name:**

**Type of Application:** Plan of Subdivision (associated with Official Plan Amendment and Zoning By-law Amendment Pre-submission of January 20, 2020)

**Site Location:** 525-565 Conestogo Road West, City of Waterloo

**Meeting Date(s):** January 20, 2020 for OPA/ZBA and August 19, 2020 (conference call) for Plan of Subdivision

### Conference Call Participants for Subdivision:

| Name                  | Agency                            | Contact                             |
|-----------------------|-----------------------------------|-------------------------------------|
| Chris Pidgeon         | GSP Group                         | cpidgeon@gspgroup.ca                |
| Kristen Barisdale     | GSP Group                         | kbarisdale@gspgroup.ca              |
| Laura Dewar           | City of Waterloo                  | Laura.Dewar@waterloo.ca             |
| Sylvia Rafalski-Misch | Regional Municipality of Waterloo | SRafalski-Misch@regionofwaterloo.ca |

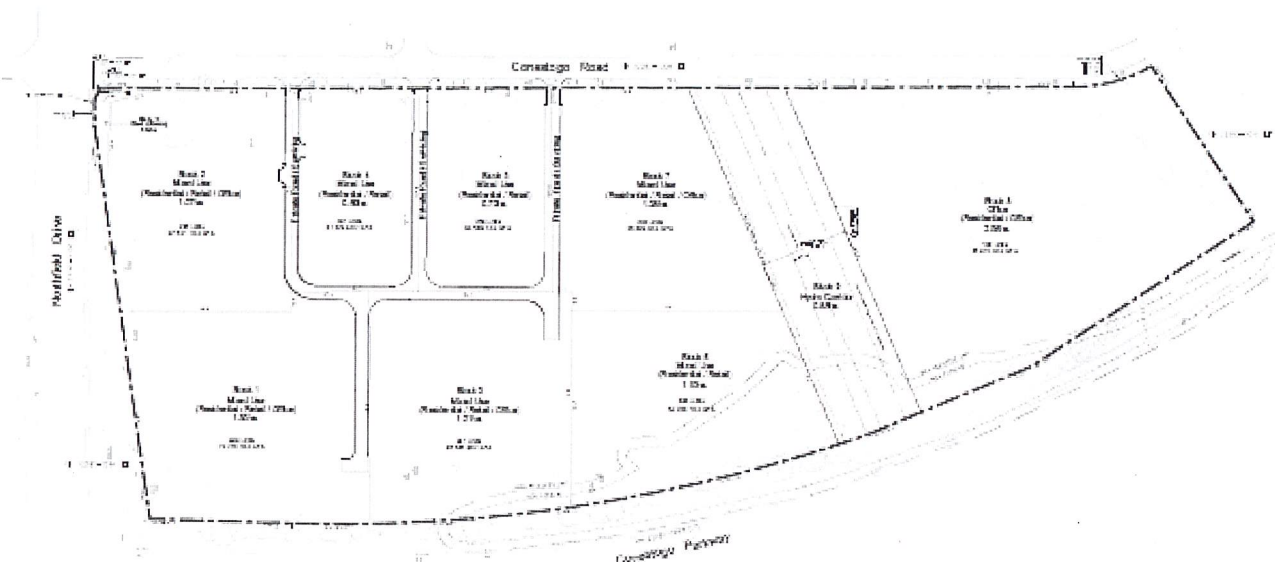
### File summary:

A pre-submission consultation meeting was held on January 20, 2020 for a proposed Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) to permit a mixed use development on a 10.7-hectare site located at 525-565 Conestogo Road West, in the City of Waterloo (former Kraus Flooring industrial site). Detailed application submission comments and requirements from various agencies were identified in the City of Waterloo letter dated March 12, 2020. Since then, the applicant has advised that a Plan of Subdivision application will also be submitted with the OPA/ZBA applications. This Record includes any additional comments/submission requirements for the proposed Plan of Subdivision. The March 12, 2020 letter is also applicable to the proposed Plan of Subdivision and is attached as Appendix A to this Record.

The proposed Plan is for 8 mixed-use blocks (commercial/office/residential), a hydro corridor block and a road widening block. The applicant proposes cross-easements and rights of way agreements to integrate shared access and municipal services between the various proposed individual blocks. Each block is intended to be developed in the future through a Plan of Condominium. The proposed subdivision concept plan is identified on Figure 1.

The lands are designated Urban Area and Built Up Area in the Regional Official Plan (ROP). The details with respect to the existing land use designations in the City of Waterloo Official Plan and zoning on the subject lands are provided in the City's March 12, 2020 letter.

**Figure 1 – Proposed Subdivision Concept Plan**



**Agency comments:**

**1. City of Waterloo**

**A. New Submission Requirements**

10 paper copies of the Draft Plan of Subdivision

Combined OPA/ZBA/Draft Plan of Subdivision Application Fee (cash, cheque or debit)

- \$62,420 if made on or after Sept 1, 2020

**B. Laura Dewar – Planning Approvals**

- Block 6 does not appear to have access to the internal private road.
- The Submission should explain how the required parkland dedication is being provided, in accordance with the City's Parkland By-law 2011-098. The City's preference is to acquire lands for parkland purposes, rather than to gain public access through easements. Please note that typically the City does not accept lands within a utility/hydro corridor, which are subject to easements and restrictions on the use of such lands, as parkland.
- Please show all proposed easements and include description of the easements shown (what purpose they serve and what parties would be involved).
- The City recommends the internal private road be a separate block on the draft plan of subdivision.
- Staff have concerns with the proposal for 3 closely space access points (for the internal private road) along Conestogo Road West on the north side of the hydro corridor. Assume that 1 or 2 driveway access points are also proposed for Block 8 on the south side of the hydro corridor. Recommend reducing the number of access points on the north side of the hydro corridor to 2 and increase the space between these accesses.

**C. Brandon Thompson – Building Standards**

- The private water system will have to comply with the Ministry of the Environment, Conservation and Parks regulations for non-municipal residential drinking water systems.

**D. Mike Defoa – Engineering Services**

- If shared services are proposed between blocks – the City will be looking for a Shared Services Agreement.

- 
- Regarding water servicing – staff will require further information. To avoid the street fronting properties becoming the “distributor” of water to the rear properties, easements may be required over the water main, extending from the right of way, to the rear properties.

E. Ric Martins – Growth Management (Policy)

- The southern portion of the subject lands is designated business employment in the OP. The Region has deferred their decision for the land use designation for the northern portion of the subject lands. This means that the land use designation for the northern portion of the lands remains under the old OP framework, which is Industrial.
- The applicant will be required to demonstrate that criteria 2.2.5(1) in the Growth Plan are met. Staff recommend the applicant work with the Region as they undertake their Municipal Comprehensive Review to ensure that their interpretation of these criteria are consistent.
- An OPA and ZBA submission should include a masterplan or block plan for the site, given its size and the complexity of issues that need to be addressed.
- City staff will review the application in the context of the existing Employment Land policies in the Official Plan, the recently adopted Conestoga Station Area Plan and the information provided through the Region’s Municipal Comprehensive Review.
- Would like to see a planning justification report addressing the distribution of mixed-use and residential development and how residential uses will be transitioned from the employment uses that surround the site.
- Mixed use and Commercial uses being proposed but are not permitted under the current policy framework for the site. An OPA will be required subject to the findings of the Regional MCR process.
- The Station Area Plan for the Conestoga area outlined direction for pedestrian connections. Any future proposal for the site should provide an extensive pedestrian connection plan consistent with the Station Area plan
- Given the location, surrounded by business employment uses, an urban design plan and consideration for the public realm should be completed to the satisfaction of PA as part of the overall submission package and consideration for the OPA process.
- Include Site comparisons of proposed residential and employment density vs what the OP allows. Also, total proposed commercial GFA

F. Robyn McMullen – Environmental Comments

- Environmental Monitoring:  
The City typically requires environmental monitoring for Plans of Subdivision in accordance with our Development Monitoring Protocol (attached), However, given that there is only one designated natural feature on the site (the watercourse), and the Scoped EIS will be used to confirm its status, and that the site is outside of a wellhead protection area, pre-development monitoring will not be required. The necessity for and scope of during- and post-development monitoring can be determined following the completion of the Scoped EIS. (Development Monitoring Protocol provided for information).

**As the proposed Plan of Subdivision is associated with the Official Plan Amendment and Zoning By-law Amendment applications, please submit all plans and reports and the City application fee (as identified by the City for all three applications) directly to the City of Waterloo.**

## **2. Grand River Conservation Authority (GRCA)**

As per the GRCA’s previous comments identified in the City’s March 12, 2020 letter, a Stormwater Management Plan/Report will be required. The following fee will be applicable to the OPA/ZBA/Subdivision applications:

- 
- Total fee: \$15,033.70
    - Base fee: \$2,295.00
    - Net hectare fee: \$1,195 x 10.66 ha = \$12,738.70
  - Total due upon submission: \$15,033.70 x 70% = \$10,523.59
  - Remaining fee due prior to draft plan approval: \$15,033.70 x 30% = \$4,510.11

**Please submit the application review fee of \$10,523.59 directly to the GRCA at the time of the submission of the applications.**

### **3. Waterloo North Hydro**

In addition to the comments provided in the City's March 12, 2020 letter, Waterloo North Hydro notes that the Ø1.05m storm pipe identified on the draft servicing plan is shown to cross Hydro's concrete encased duct bank. The duct bank is approximately 1m to 2m below existing grade and is 0.8m high. (It is dropping at that location). The applicant must design the storm pipe to avoid the conflict as it would be extremely difficult and costly to relocate the duct bank.

### **Regional Municipality of Waterloo:**

The following comments/submission requirements for the Plan of Subdivision application are in addition to Regional comments provided in the City's March 12, 2020 letter attached as Appendix A to this Record.

#### **General**

The plan of subdivision application form can be found at:

[https://www.regionofwaterloo.ca/en/resources/Applications/PLAN\\_OF\\_SUBDIVISION\\_APPLICATION\\_FORM.pdf](https://www.regionofwaterloo.ca/en/resources/Applications/PLAN_OF_SUBDIVISION_APPLICATION_FORM.pdf)

The applicant/owner is requested to submit an electronic copy of the application form, all plans and reports to [PlanningApplications@regionofwaterloo.ca](mailto:PlanningApplications@regionofwaterloo.ca) in addition to the number of paper copies identified on the Checklist for Complete Application. The attached required plans and report/study Checklist includes the number of paper copies of each plan/report/study required for the Region's review only. Any additional paper copies of plans/reports/studies requested by the City or other agencies will need to be submitted directly to the City or the agency.

#### **Proposed Plan**

Questions and considerations: Should the internal private road be identified as a separate block on the draft plan of subdivision? Could the private road/services be set up as a future Common Element Plan of Condominium with the proposed individual lots as Parcels of Tied Land (POTLs)? Details on the shared services/easements/private roads and future ownership need to be provided as part of the Plan of Subdivision application. All blocks, or proposed easements for services and access must be identified on the plan. It may be beneficial for the applicant to discuss with a Condominium Lawyer the proposed plan, future ownership of the individual lots and shared services/private roads and condominium types in conjunction with the proposed Plan of Subdivision prior to application submission.

#### **Salt Management Plans**

Please note, a Salt Management Plan (SMP) will be required at the time of any future site plan and/or plan of condominium application for each proposed block.

#### **Public Consultation Strategy**

Please note, since the Planning Act changes through Bill 73 - Smart Growth for Our Communities Act, 2015, the applicant is required under O. Reg. 544/06, amended O. Reg. 178/16 to provide "A proposed strategy for consulting with the public with respect to the application". The submission of a public consultation strategy, which may include additional public consultation by the applicant, over and above the City's statutory public consultation, is required as part of a complete plan of subdivision application. The applicant should discuss this strategy with the City prior to submission.

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## **Servicing**

Water Services staff will require a Functional Servicing Report for the proposed Plan of Subdivision. Water Services staff met with the applicant's consultant, WalterFedy and provided them with boundary conditions to complete the Functional Servicing Report in regards to water servicing on June 25, 2020.

In addition, the proposed servicing of the subject lands (shared water service between multiple future condominium properties) may result in the creation of a Non-Municipal Year-Round Residential System under the Safe Drinking Water Act (SDWA), 2002. Prior to draft approval, the City, as the provider of water services in this area, will need to confirm whether the servicing and parcel configuration meet the definition of a Non-Municipal Year-Round Residential System in accordance with the *Safe Drinking Water Act, 2002, S.O. 2002, c. 32*.

If confirmed that a Non-Municipal Year-Round Residential System will be created, the Owner/Applicant is advised to consult with the City/Ministry to determine what, if any, requirements may be applicable under the Safe Drinking Water Act. Furthermore, as a condition of draft approval, the City of Waterloo will be required to provide the Region with a copy of the municipal consent submitted to the Ministry of the Environment, Conservation and Parks as required by the Safe Drinking Water Act, 2002, S.O. 2002, c. 32, and a copy of a registered agreement, where applicable, which secures the terms and conditions of the municipal consent. The Owner/Applicant will be required to register the Drinking Water System within 30 days of receiving municipal consent, and include provisions in the Subdivision Agreement and future final Condominium Declarations for the various Condominiums to the satisfaction of the Region, advising unit owners/tenants of the Drinking Water System and that the Condominium Corporation(s) will be responsible to carry out all duties and obligations for the operation and maintenance of the System, in accordance with the *Safe Drinking Water Act, 2002, S.O. 2002, c. 32*.

## **Corridor Planning - Access Permit/TIS/Access Regulation**

The Region of Waterloo will require a full Transportation Impact Study for this development proposal. As per the Region of Waterloo's Transportation Impact Study Guidelines, a pre-consultation meeting with the transportation consultant is required to determine the scope of the study. The Ministry of Transportation shall be consulted on this meeting, and their approval of the Transportation Impact Study will be required for final approval.

Should the TIS recommend any additional road improvements on Northfield Drive West, a functional design, cost estimate, letter of credit/certified cheque along with a signed agreement for the road works may be required for any non-intersection related works. Of note, any work within the Regional road allowance will be required to be completed under a Regional Road contract.

## **Corridor Planning - Stormwater Management**

Regional staff acknowledge receipt of the preliminary Functional Servicing Plan dated August 8, 2020 submitted by Walterfedy for the proposed development and currently under review. A detailed Lot Grading, Site Servicing plans and a detail Stormwater Management Report will be required under the detailed engineering design for this development. Please email all pertinent plans and report, no hard copies are requested. The Region will require soft copy (pdf) of the Functional Servicing Report, Storm Water Management Report, and all engineering drawings. Detailed Site Grading and Servicing Plans and Stormwater Management Report will be required at Site Plan.

## **Corridor Planning - Transit Planning**

As this is currently an OPA/ZBA & Draft Plan of Subdivision application, please note that the developer will be required to provide funding for install/upgrade a bus stop on the Northfield Drive West frontage of the property (specific model and cost will be communicated upon formal Draft Plan of Subdivision submission). A cheque shall be provided payable to the Region of Waterloo. The applicant shall have to identify the GRT landing pad and shelter pad on all plans (site plan, landscape plan etc.).

## **Corridor Planning - Environmental (Traffic) Noise**

At this location the proposed residential development may encounter environmental noise sources, specifically road noise from adjacent Provincial Conestoga Pkwy (Hwy 85) and Regional Road (Northfield Drive West RR

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#50). It is the responsibility of the applicant to ensure the proposed development is not adversely affected by anticipated noise impacts. The applicant must prepare an Environmental Noise Study, the noise level criteria and guidelines for the preparation of the study should follow the Ministry of the Environment NPC-300 requirements.

The noise consultant must be pre-approved by the Region of Waterloo. The noise consultant is responsible for obtaining current information, applying professional expertise in performing calculations, making detailed and justified recommendations, submitting the Consultant Noise Study Declaration and Owner/Authorized Agent Statement along with one electronic copy of the report to the Region of Waterloo.

The noise consultant preparing the Environmental Noise Study must contact Ministry of Transportation Ontario (MTO) for transportation data including traffic forecasts and truck percentages for Provincial roads (Highway 85) and Region of Waterloo staff for transportation data including traffic forecasts and truck percentages for Regional roads. For the Transportation Planning Noise Assessment Fee Form please refer to the Region's website. There is a \$250 fee for this application. As indicated on the form, traffic forecasts for noise assessments will be prepared within 15 business days of the data of the request, but will be withheld if payment has not been received.

Please forward requests for transportation data for Regional Road (Northfield Drive W RR #50) to:  
Kornel Mucsi, Manager  
Strategic Transportation Planning  
Email: [KMucsi@regionofwaterloo.ca](mailto:KMucsi@regionofwaterloo.ca)  
Phone: 519-575-4400 Ext 4085

### **Corridor Planning - Stormwater Management & Site Grading**

Regional staff acknowledge receipt of the preliminary Functional Servicing Plan dated August 8, 2020 submitted by Walterfedy for the proposed development and currently under review. A detailed Lot Grading, Site Servicing plans and a detail Stormwater Management Report will be required under the detailed engineering design for this development. Please email all pertinent plans and report, no hard copies are requested.

Please note that Storm sewers within the Regional road right-of-way are generally sized and designed to only accommodate Stormwater from the right-of-way and in some instances off road surface drainage under existing conditions. A private Stormwater connection to any storm sewer on Northfield Drive West will be discouraged where an alternate Stormwater connection is available, including infiltration if soil conditions and Source Protection under the Clean Water Act permit, or if it is determined that the Northfield Drive West storm sewer does not have the sufficiency (condition and capacity) to accommodate private Stormwater flows from this site. It is the responsibility of the applicant's engineering consultant to determine an appropriate Stormwater outlet from this site and the sufficiency of the receiving storm system if there is no other option available and to include this information in the Stormwater management report.

Any work required on the Region of Waterloo road allowance will require Municipal Consent and Regional Road Work Permit. A Regional of Waterloo Work Permit must be obtained from the Region of Waterloo prior to commencing construction within the Region's right of way. In this regard, please visit <https://rmow.permitcentral.ca/> for further guidance.

The site must be constructed and graded in accordance with the approved plans and Storm Water Management Report, and the storm water management features maintained in accordance with the suppliers and reports recommendations. The Regional Road allowance must be restored to the satisfaction of the Regional Municipality of Waterloo.

### **Region's Application Fees (OPA/ZBA/SUBDIVISION)**

In accordance with Regional Fee By-law 20-001, the applicant/owner must pay the following Regional fees:

- Plan of Subdivision application submission fee – \$6,525, plus \$250 per hectare, for a **total submission fee of \$9,200** (\$6,525 + \$2,675 for 10.7 hectares);

Checklist of Other Information and Materials Required for a Complete Application: See attached minutes and additional notes for details.

| For Office Use Only                                      |              |                      |  |
|----------------------------------------------------------|--------------|----------------------|--|
| Report/Study                                             | Required     | Reviewing Agent      |  |
| Affordable Housing Report/ Rental Conversion Assessment  |              |                      |  |
| Aggregate/Mineral Resource Analysis                      |              |                      |  |
| Agricultural Impact Assessment                           |              |                      |  |
| Archaeological Assessment                                |              |                      |  |
| Chloride Impact Study/Salt Impact Assessment             |              |                      |  |
| Cut & Fill Analysis                                      |              |                      |  |
| Development Phasing Plan                                 |              |                      |  |
| Dust Impact Analysis                                     |              |                      |  |
| Environmental Impact Study (Scoped)                      | ✓            | City                 |  |
| Environmental Site Assessment / Record of Site Condition | ✓ (1 copy)   | Region/City          |  |
| Floodline Delineation Study/ Hydraulics Study            |              |                      |  |
| Heritage Impact Assessment                               |              |                      |  |
| Hydrogeological Assessment                               | ✓            | City                 |  |
| Land Use Compatibility                                   | ✓ (1 copy)   | City/Region          |  |
| Landfill Impact Study                                    |              |                      |  |
| Local Air Quality Study                                  |              |                      |  |
| Minimum Distance Separation                              |              |                      |  |
| Natural Heritage Inventory                               |              |                      |  |
| Noise Study (Road and Stationary Noise)                  | ✓ (1 copy)   | City/Region          |  |
| Odour Impact Assessment                                  |              |                      |  |
| Parking Analysis/Parking Justification Study             | ✓            | City                 |  |
| Pedestrian Route and Sidewalk Analysis                   |              |                      |  |
| Planning Report/Employment Lands Study                   | ✓ (1 copy)   | Region/City          |  |
| Preliminary Grading Plan and Drainage Plan               |              |                      |  |
| Preliminary Stormwater Management Report/Plan            | ✓ (1 copy)   | City/Region/GRCA/MTO |  |
| Retail / Commercial Impact Analysis Study                |              |                      |  |
| Roundabout Feasibility Analysis                          |              |                      |  |
| Servicing Options Report / Functional Servicing Report   | ✓ (1 copy)   | Region/City/GRCA/MTO |  |
| Slope Stability Study and Report                         |              |                      |  |
| Soils/Geotechnical Study                                 | ✓            | City                 |  |
| Subdivision Plan(s)                                      | ✓ (2 copies) | Region/City          |  |
| Traffic Control and Parking Plan                         |              |                      |  |
| Transit Assessment                                       |              |                      |  |
| Transportation Demand Management Options Report          |              |                      |  |
| Transportation Impact Study                              | ✓ (1 copy)   | Region/City/MTO      |  |
| Urban Design Report/Brief                                |              |                      |  |
| Vibration Study                                          |              |                      |  |
| Draft Plan of Subdivision Application (1 original)       | ✓ (1 copy)   | Region/City          |  |
| OTHER (specify): Public Consultation Strategy            | ✓ (1 copy)   | Region/City          |  |
| Wind Study and Shadow Study                              | ✓            | City                 |  |
| Sustainable Design Strategy                              | ✓            | City                 |  |

☐ Complete
 ☐ Application cleared for acceptance and circulation

☐ Incomplete
 ☐ Letter identifying which additional studies are required

Date: \_\_\_\_\_

- Registration release fee - \$2,000 (per Phase) to be paid after draft plan approval and prior to registration of the plan
- Official Plan Amendment application fee - \$5,750
- Zoning By-law Amendment application review fee - \$1,150
- Noise Study Review fee - \$250 (see comments above)
- Transportation Impact Study fee - \$402.50 (includes pre-consultation)

**Total submission fee for all three applications is \$16,752.50.**

**Other Criteria & Additional Notes:**

Regional staff acknowledges receipt of the \$300 pre-submission consultation fee.

**Staff Person handling the file:** Sylvia Rafalski-Misch

**Contact information**

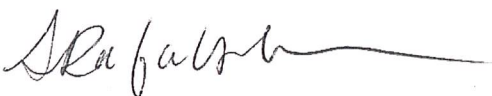
Region of Waterloo  
Planning, Development and  
Legislative Services  
150 Frederick Street, 8<sup>th</sup> Floor  
Kitchener, ON N2G 4J3  
226-753-3261

**To whom should all correspondence be sent?**

Owner ☐  
Applicant ☒  
Agent ☒  
Other ☐

**Contact information**

Chris Pidgeon/Kristen  
Barisdale  
GSP Group Inc.,  
72 Victoria Street S.  
Kitchener, ON N2G 4Y9  
519-569-8883

**Staff Signature:**  **Date:** September 16, 2020

  
**Commissioner (or delegate) Signature:** \_\_\_\_\_  
**Date:** September 16, 2020