

MEMO

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CC: Justin McFadden

Date: July 2, 2025

Re: Request to Decrease the Minimum Parking Requirement in Generation Park Zoning

Summary

- The City of Waterloo has one of Ontario's highest minimum parking space requirements based on a city comparison among selected cities in the province undertaken by staff and study by Stantec.
- Stantec in their 2023 Parking Standards study conducted for the City of Waterloo compares the City Industrial Rates to Institute of Transportation Engineers for General Light Industrial, finding an average parking rate of 0.70 to 1.09 per 100 sqm of GFA based on 40 studies with warehousing being less.
- Stantec Parking Standards Study (2023) found General stand-alone office parking of 2.57 per 100 sqm GFA.
- The average minimum parking rate per 100 sqm across selected cities in Ontario undertaken by staff is 1.19 parking spaces for industrial uses.
- There is less demand for parking than traditionally required for industrial uses due to increasing automation to respond to employment challenges. This has resulted in lower rates of employees per square foot than previously experienced. In recent years, the City of Waterloo has received several minor variance and zoning bylaw amendment applications requesting a reduction in the minimum number of required parking spaces as noted by Stantec, placing pressure on staff time to deal with each application on a case-by-case basis.

- 325 Northfield Drive East, Waterloo parking was recently reduced to 1.5 spaces per 100 sqm for an industrial mall application in a decision made by the Ontario Land Tribunal.
- Generation Park's strategic location near a major transport corridor and future public transit expansion in the area combined with Council direction around sustainability will encourage alternative forms of transportation for workers.
- Reducing large parking in favour of active use areas for employees will improve the ability to achieve Zero Carbon Building Standard and LEED certifications as supported by Council which take into account parking requirements and requires a 30% reduction in parking over standard rates.
- Staff are seeking to reduce minimum parking ratios, and to facilitate for comprehensive site planning on a block basis (similar to that seen at the Boardwalk) for Blocks 4, 5, 6, 7, and 11 in Generation Park to facilitate efficient overall site design and function, including access and truck turning, given that access is restricted from Platinum Drive.

Background

In developing the sales and marketing plan for Generation Park, economic development staff undertook an exercise to explore the feasibility of a three-storey industrial condo/mall to front along Platinum Drive. This is in response to meetings held with the University of Waterloo (Velocity), general inquiries over the past five years to our division and inquiries from businesses in Waterloo seeking to expand. These have pointed to a gap in the City for units that can either be leased or purchased ranging from 2,500 to 10,000 square feet.

The Urban Design Guidelines approved for the Park identify key considerations that staff have attempted to address in a high-level overview site plan, including:

- Frontage activation along Platinum
- Create a sense of place
- Continuous active building edge along Platinum Dr. and bring building frontages closer to the street
- Ratio of 3:1 building height to width ratio
- Multi-storey design as zoning anticipates up to 9 stories to create sense of place, streetscape interest and general high-profile façade with upper-level flex space and main level manufacturing/assembly
- No vehicle access from Platinum Dr.

- The Generation Park urban Design guidance and Sustainability standards promote decreasing parking areas and encourage alternative modes of transportation and land intensification.

The preliminary site plan work done on the Platinum Drive blocks by Fotenn to map out potential mixed use Industrial uses as well as conceptual building layouts determined that there is no capacity to accommodate more than one-storey building on these properties with the existing parking ratios. The current ratios would restrict the ability to accommodate more than one building in the central blocks, reducing the ability to activate both street frontages. Similarly, it would make it difficult to divide the central blocks for more than one purchaser based on need and building size.

Under the current parking framework, it is anticipated that one large manufacturing facility would locate along Platinum with the remainder of the property being required to accommodate parking. Retaining the existing ratio of 2.5 spaces per 100 square meters of building space would result in expansive areas of parking, further reducing the ability to meet the design guidelines for the park and result in large amounts of underutilized parking.

This poses a challenge implementing the key principles adopted by Council for the park that include: efficient use of land, high degree of urban design aesthetic, intensified development and overall sustainability.

Fotenn also identified during this exercise that from their experience working across Ontario and Canada that this was a high parking ratio for industrial uses. The ability to more intensely develop these parcels will result in increased tax base for the City and more employment for residents. With Generation Park being the last greenfield parcel for new Industrial development, the ability to achieve the highest densities possible is important for the long-term economic benefit and future employment within the city.

A current company that is looking to purchase a parcel in Generation Park plans to build a 6,503 square metre facility. With current rates, they would be required to provide 163 parking spaces. With the proposed revised rates they would be required to provide 53. This will accommodate their employee work complement that is anticipated. Moreover, companies will have a good understanding of their needs and may elect to provide additional parking.

Parking Rate Comparison

In looking to understand best practices in parking ratios for light industrial uses, Economic Development staff looked at 13 cities across Ontario. Based on this exercise, Waterloo was

found to have one of Ontario's highest minimum parking space requirements. Compared to Ottawa, Toronto, and London, which have one of the lowest parking ratios for light industrial land use, the current parking space ratio for industrial land use in Waterloo ranges between 1.5 to 2.5 spaces per 100 sqm depending upon the parking zone. Kitchener requires a lower parking rate in the Waterloo region, with 1.42 spaces required per 100 sqm for industrial employment areas different from downtown. Cambridge requires 20% of the lot area to be provided for parking lot in addition to storage and delivery areas.

In addition, Stantec's findings of their Parking Standards Study conducted for the City in 2023 for future updates to the Zoning By-law considered comparable municipalities as well as comparing ITE rates which is a general rule of thumb for efficiently used parking. It found that the average across 40 municipalities was 0.7 spaces per 100m of building area.

The City of Kitchener contemplates shared parking where land uses are compatible and complementary to permit sharing of parking stalls. Kitchener encourages a variety of parking requirements that may be minimized, and sharing parking and access is encouraged. This is a consideration that staff recommend for the middle blocks of the park, whereby access to the parcels fronting Platinum Drive is limited to the side streets. For effective truck access, a coordinated design would permit better flow across both sites and minimize conflict with pedestrian, truck and automobile traffic and better overall site design and aesthetic.

In addition, given that the background work undertaken for the OP Review looking at employment lands, identified a shortage of industrial land in the City, it is anticipated and preferred that these lands in Generation Park be promoted for employment light industrial uses. This is a land use that cannot easily be accommodated through infill and redevelopment, and this represents the last greenfield opportunity in Waterloo. The ability to maximize the capacity of these lands is important for the future economic growth and vitality in the City.

Goals and City Interest

Generation Park is a project initiated by the City to generate employment lands to ensure future employment opportunities will match projected growth targets. In doing so, additional benefits from the project will be realized by maximizing the return on investment through future land sales, future tax revenues (maximized by increasing building density and square footage possible per lot), and employment growth in the City at a time when employment land conversions for residential are frequent in MTSA's which is impacting the availability of land for industrial uses. Further provincial policy shifts will impact the ability to protect employment lands and as a result, staff will recommend ensuring that Generation Park meets the definition of employment as predominantly lands for manufacturing.

Sustainability

City of Waterloo Council directed staff to develop Sustainability Standards that will reduce greenhouse gas emissions in the park. The Standards adopted by Council address a number of issues regarding the building but a reduced parking ratio will also encourage other forms of transportation including EV, electric bicycle and public transportation. A great deal of work is being done with the Region to prioritize public transportation as key infrastructure for employment areas. In addition, pilot programs are being considered to bridge the gap in the short term while the park is being developed.

The City is requiring applicants to achieve LEED standards as per direction of Council, and LEED's new construction standards promote a 30% parking reduction below the base ratios for parking spaces to minimize the environmental harms associated with parking facilities, including automobile dependence, land consumption, and rainwater runoff.

Additionally, Stantec has noted that the City has been receiving a number of zoning amendments requesting parking reductions, including the recent parking reduction for 325 Northfield drive of 1.5 spaces per 100 square metres. Should a specific facility have a requirement due to high ratio of employees, it is anticipated that they would plan accordingly.

A designated 10-metre-wide open-space green walkway was also identified as the east-west connection through the Generation Park site, providing key active transportation connections across the HONI corridor to the existing residential community to the west. It is anticipated that with strong connections that there will be a higher adoption of alternative forms of transportation within the Park and designing to encourage this is critical to the sustainability of this park.

Comparable Municipal Requirements

A number of cities were reviewed to understand how parking trends are being dealt with in the context of employment areas (industrial zones). Warehousing was not considered as part to this exercise as this is not a permitted single use within the park.

The City of Waterloo has one of Ontario's higher minimum parking space requirements for light industrial use, based on a city comparison among 13 similar cities in the province.

Of the 13 similar cities in Ontario, the most frequent parking space ratio requirement is between 0.4 and 1.0 for industrial uses.

- Ottawa requires the lowest minimum parking ratio for light Industrial between 0.4 - 0.8/100 sqm depending on the project location, offices (1-2.4 per 100 sqm), Research and Development Office (0.4-0.8/100 sqm), Technology Industry (0.4-0.8/100 sqm).
- In Toronto, the parking rates for manufacturing is 0.5 for each 100 sqm. For Office/Software Development and Processing in (A) Policy Area 1 (PA1) at: (i) a minimum rate of 0.35 for each 100 sqm; and (ii) a maximum rate of 0.8 for each 100 sqm.
- In London, the rate for Advanced Manufacturing Industrial Uses is 0.2 per 100 sqm (1 space per 500 sqm), and for Industrial Malls, 0.5 per 100 sqm (1 space per 200 sqm), as per a recent Zoning By-law update. For the sake of calculations below, we have used a rate of 0.5 spaces per 100 sqm.
- The City of Kitchener has a minimum requirement of 1 space per 90 sqm and a maximum requirement of 1 space per 70 sqm of GFA. At the maximum rate, that translates to 1.42 spaces required per 100 sqm for industrial areas.
- Cambridge requires a rate of 2.5 spaces per 100 sqm for industrial malls but a rate of 20% of total lot area for all other industrial uses.
- Kingston has recently updated their parking standards, industrial uses fall under “all other uses” and have no minimum parking requirement as they leave it up to the developer to determine appropriate number of spaces required for development.
- St. Catharines requires a rate of 1 space per 100 sqm of gross leasable floor area.

Average parking ratios among selected cities in Ontario

City	Minimum Parking Spaces per 100 sqm
Kingston	0.0
Ottawa	0.4
London	0.5
Toronto	0.5
Guelph	1.0
St. Catharines	1.0
Oakville	1.0
Vaughan	1.0
Kitchener	1.42
Mississauga	1.6

City	Minimum Parking Spaces per 100 sqm
Burlington	2.0
Waterloo	2.5
Cambridge	2.5
Average	1.19

Additionally, the review undertaken by Stantec for the City of Waterloo supports the findings of Economic Development staff's review. Stantec review notes that a parking ratio requirement of 2.5 spaces per 100 sqm of GFA exceeds the average across municipalities (of approximately 1.19) and the ITE average of 0.7. Stantec found by comparison that the ITE rate would be 2.5 for stand-alone general office building.

Conclusion/Recommendations

Overall to achieve the Council-approved requirements in the Urban Design Guidelines and sustainability standards to the Park, the current minimum requirement will not result in the multi-level intensified development as conceived. including our goal to promote public transportation and active transportation.

Economic Development staff are requesting planning to consider reducing the parking minimum for the park utilizing their delegated authority or as part of broader zoning housekeeping amendments.

As staff anticipate bringing an offer to purchase, the timeliest approach to advance this would be supported. Specifically, staff are seeking to reduce the parking requirement for single occupancy industrial buildings and industrial malls to align with the work that has been undertaken by Stantec, as well as the industry and other municipalities across Ontario. This is integral in being able to implement both sustainability standards as well as the urban design guidelines approved by Council for the Park and to support the elements required by LEED including promoting alternative transportation. In addition, staff are working with the Region to advance a pilot transit program to service the park, and to promote active transportation.

- **Parking Rate Requirement**

Update the site-specific zoning to require parking at the rate noted below:

- **Industrial Malls:**

- **1.5 PARKING SPACES** per 100 square metres of BUILDING FLOOR

AREA.

- **Single Occupancy Buildings:**
 - For the first 1,000 square metres of BUILDING FLOOR AREA, **1.5 PARKING SPACES** per 100 square metres of BUILDING FLOOR AREA.
 - For additional BUILDING FLOOR AREA over 1,000 square metres but less than 5,000 square metres, **0.75 PARKING SPACES** per 100 square metres of BUILDING FLOOR AREA.
 - For additional BUILDING FLOOR AREA greater than 5,000 square metres, **0.5 PARKING SPACES** per 100 square metres of BUILDING FLOOR AREA.
- **Additional Clause:** Provide wording to permit shared integrated parking design including access/egress within Blocks 4, 5, 6, 7 and 11 better accommodate functional site design with required truck deliveries and turning radius given the limited access from Platinum Drive and to facilitate the development of buildings along both frontages.
- Notwithstanding anything to the contrary, the following additional regulations shall apply to the lands described as Blocks 4, 5, 6, 7, and 11 on Image 1 to this zone:
 - The lands comprising Blocks 4, 5, 6, 7, and 11 shall each be deemed to be one (1) LOT for the purpose of calculating BUILDING FLOOR AREA, LANDSCAPED OPEN SPACE, PARKING, SETBACKS, and to facilitate shared access and shared parking, in meeting the performance requirements in the zoning by-law Table 9a and 9B regardless of ownership.
 - PARKING SPACES shall be permitted in the FRONT YARD, SIDE YARD and REAR YARD abutting a common element ROAD with the exception of Platinum Drive.