February 27, 2019

Ontario Growth Secretariat   
C/O Charles O’Hara   
Director, Growth Planning and Analysis Branch   
Ministry of Municipal Affairs   
College Park 23rd Floor   
777 Bay St.   
Toronto ON M5G 2E5

Re: City of Waterloo Comments on draft Amendment 1 of the Growth Plan

Dear Mr. O’Hara

Thank you for the opportunity to provide comments on the proposed Amendment 1 to the Growth Plan. City of Waterloo Council endorsed overall comments on the proposed modifications on February 4, 2019. Additional comments related to the proposed mapping for the new Provincial Significant Employment Zones and Urban Design are noted below. Relevant attachments and comments are included and form part of this submission. City of Waterloo comments include:

1) Overall comments on the proposed Amendment 1 of the Growth Plan – see Council approved Staff report (attached)

2) Provincially Significant Employment Zones Mapping – Area 24 City of Waterloo - Please see attached map of the proposed Provincially Significant Employment Zone overall laid to the City of Waterloo’s designated Employment Area. Specifically, the City notes the following:

a) Open Space – inconsistent application of which open spaces are either included or excluded from the PSEZ

b) Priority Area – Several “Priority Areas” were identified through the City of Waterloo’s extensive Station Area Planning Study. These areas were identified as prime candidate sites for mixed-use developments, which would support transit, use. The intent is to have primarily employment uses but allow for supplemental residential and commercial uses. The City of Waterloo requests removing identified priority areas from proposed the PSEZ to allow for a conversion if necessary.

c) Station Area - the two Station Area Boundaries are shown on the attached Map. These boundaries were delineated thought the City’s Major Transit Station Area Study, which was approved by Council in June 2017. The City requests that for the proposed PSEZ either:

a) Station Area’s be excluded from any PSEZ; or,

b) Where a municipal identified Station Area overlaps a PSEZ, mixed-uses be permitted.

d) PSEZ Boundaries – please see attached files which outlines discrepancies between provincial mapping and actual parcel fabric. The City has provided current GIS layers to highlight property boundaries and designations.

e) The municipal border between the City of Waterloo and the Township of Woolwich should be included on the Provincial maps

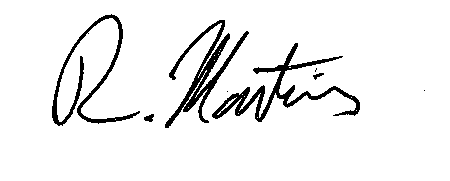
3) Urban Design Comments:

Section [2.2.1.4](http://2.2.1.4)  under managing growth provides direction for supporting the achievement of complete communities. Specifically [2.2.1.4](http://2.2.1.4) e) provides direction for more compact built form. However, the terms “attractive” and “urban design” have been removed from Growth Plan policy. The reduced emphises on creating attractive communities and good urban design standards is concerning. Regardless of whether areas being planned are infill/intensification or new growth areas, attractive and well-designed communities have benefits beyond aesthetic considerations. Well-designed communities function better and improve quality of life for residents who will live in these areas long after they have been developed.

The public is not well served where development is completed with poor urban design. For example, there is often concern from residents when a new intensification project is proposed. One of the worst arguments against intensification is intensification of poor quality and design. The Province must strike a balance between encouraging growth to provide for more housing and ensuring that projects are well designed and attractive, and that they can stand the test of time. A term that is being use more often by the Province is “gentle density,” good quality urban design can aid, facilitate and ensure that gentle density is applied.

City of Waterloo planning staff remain supportive of the overall intent of the Growth Plan. Should you require any clarification on the noted City of Waterloo submission, please do not hesitate to contact the undersigned.

Kind Regards,



Ric Martins, Policy Planner, City of Waterloo

Attachments:

* Council Approved Staff Report
* Map showing recommended refinements/ changes to proposed PSEZ mapping
* GIS data to update Provincial Provided GIS shapefiles