

# Planning Justification Report

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## 36 Westhill Drive

BlockDoor (Westhill) Inc.

City of Waterloo

Official Plan Amendment

Zoning By-law Amendment

August 2025



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Zoning By-law Amendment

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**Prepared for:**

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# 1. Introduction

## 1.1 Overview

GSP Group has been retained by BlackDoor (Westhill) Inc. has prepared this Planning Justification Report (“Report”) in support of applications for Official Plan Amendment and Zoning By-law Amendment Application for the property municipally addressed as 36 Westhill Drive (“Site”) in the City of Waterloo.

The Site is located on the east side of Westhill Drive in the City of Waterloo, generally east of Ira Needles Boulevard and south of Erb Street. The Site is currently occupied by an existing single detached dwelling with associated driveway and outdoor private amenity space. The Site is approximately 0.68 hectares (1.68 acres) in size with approximately 103.98 metres of frontage on Westhill Drive.

The details of the Site and surrounding site context are contained in Section 2.0 of this Report.

The Site is proposed to be development with two (2) mid-rise apartment buildings as follows (“Proposed Development”):

- Building A: A maximum building height of 6-storeys (19.89 metres) and a total of 59 dwelling units, including one-bedroom, two-bedroom and two-bedroom plus den apartments
- Building B: A maximum building height of 8-storeys (25.76 metres) and a total of 81 dwelling units, including one-bedroom, two-bedroom and two-bedroom plus den apartments

The Proposed Development includes a combination of surface and structure parking, providing for a total of 140 parking spaces and 86 bicycle parking spaces. The Proposed Development also includes common ground floor outdoor amenity space, common indoor amenity space and rooftop amenity spaces for residents, along with each dwelling unit containing private amenity or balcony space.

The details of the Proposed Development are contained in Section 3.0 of this Report.

## 1.2 Purpose and Scope

The Site is currently designated as “Low Rise Residential” in the existing City of Waterloo Official Plan. The purpose of the proposed Official Plan Amendment to redesignate the Site from “Low Density Residential” to “Mixed-Use Medium Density Residential” with site specific provisions pertaining to maximum building height.

The Site is currently zoned “Future Determination (FD)” in the City of Waterloo Zoning By-law”. The purpose of the proposed Zoning By-law Amendment is to rezone the Site from “Future Determination (FD)” to “Residential Mixed-Use (RMU-20)” with site specific provisions pertaining to building height, setbacks and parking.

The details of the proposed Official Plan and Zoning By-law Amendments are contained in Section 6.0 of this Report.

## 1.3 Report Context and Structure

Report has been prepared to provide planning justification for the proposed Official Plan and Zoning By-law Amendments required to facilitate the Proposed Development. The objectives of this Report are as follows:

- To provide an overview of the Site, including site descriptions and a summary of surrounding uses and community context;
- To provide a brief summary of the Proposed Development;
- To provide a brief summary of all supporting technical reports and studies;
- To provide a summary of the applicable Provincial, Region of Waterloo and City of Waterloo policy and regulatory framework along with planning justification and commentary in support of the Proposed Development; and,
- To provide an overview of the proposed applications for Official Plan and Zoning By-law Amendments.

## 2. Site Overview and Context

### 2.1 Site Location and Description

The Site is municipally known as 36 Westhill Drive in the City of Waterloo and is legally known as Tract German Company Part Lot 40, Part Lot 41, Registered Plan 58R12648, Part 1. The Site is approximately 0.69 hectares (1.68 acres) in area, with approximately 104.00 metres of frontage along Westhill Drive and a depth of approximately 69.8 metres (**Figure 1**).

The Site is currently occupied by an existing single-detached dwelling and an accessory detached garage. There is a grade change of approximately 5 metres across the Site, with the highest elevation along the Westhill Drive frontage and the lowest point near the eastern property boundary.

The Site currently contains existing, mature trees in and around the existing structure as well as an existing hedgerow along the southern property boundary (adjacent to 48 Westhill Drive).

### 2.2 Surrounding Uses and Context

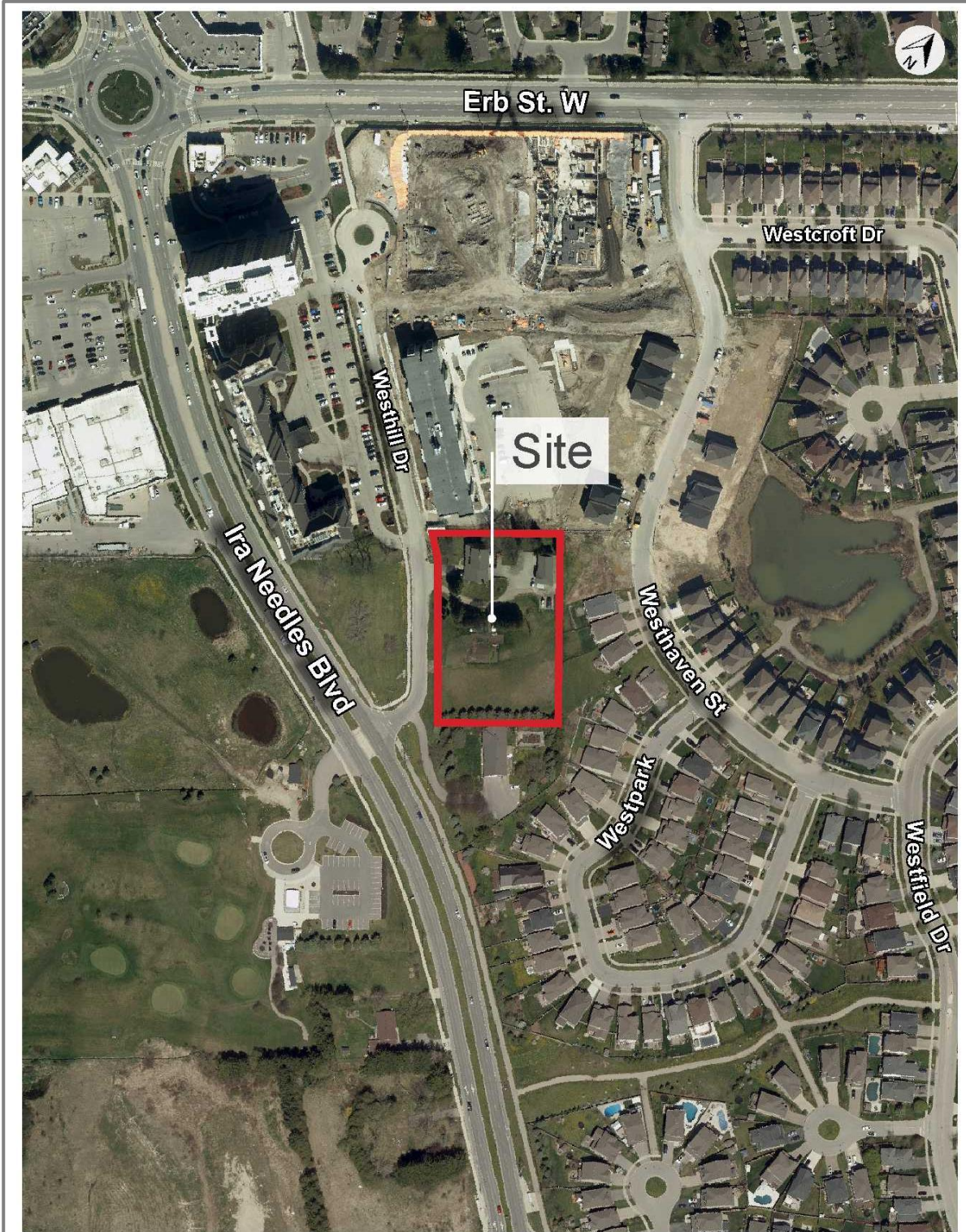
As illustrated in **Figure 2**, the immediate and surrounding land uses are as follows:

- NORTH:** An existing four-storey multi-unit residential building fronting Westhill Drive (28 Westhill Drive); Two 13-storey multi-unit residential buildings and five stacked townhouses currently under construction along Erb Street West and Westhaven Street; Further north of the Site are existing low and medium density residential uses on the north side of Erb Street West and a small retail plaza at the corner of Erb Street West and Erbsville Road.
- EAST:** Existing low rise residential uses fronting Westhaven Street and Westpark Crescent.
- SOUTH:** An existing single-detached dwelling fronting Westhill Drive (48 Westhill Drive); An existing golf course and single-detached dwelling fronting Ira Needles Boulevard; Further south of the Site is The Boardwalk, a large-scale, big-box commercial/retail plaza, containing a wide variety of commercial and retail uses such as Walmart, The Brick, HomeSense and Marshalls, Rona, restaurants, various medical offices, a movie theatre, a gym, and various smaller-scale retail units..

**WEST:** An existing four-storey and an existing 11-storey retirement home fronting Ira Needles Boulevard; An existing Tim Hortons located at the corner of Ira Needles Boulevard and Erb Street West; Further west of the Site is another large-scale, big-box commercial/retail plaza, containing a grocery store, pet store, beer store, drugstore, bank, nail salon, and restaurants.

The Site is very close to a broad range of existing commercial, retail and personal services uses. In addition, the Site is proximate to a number of existing community and institutional uses, including West Wind Park, Red River Park, Westvale Park, Westvale Public School and Holy Rosary Catholic Elementary School to the east, Resurrection Catholic Highschool to the south and the Kitchener-Waterloo Chinese Alliance Church and the Kitchener-Waterloo Bilingual School to the north.

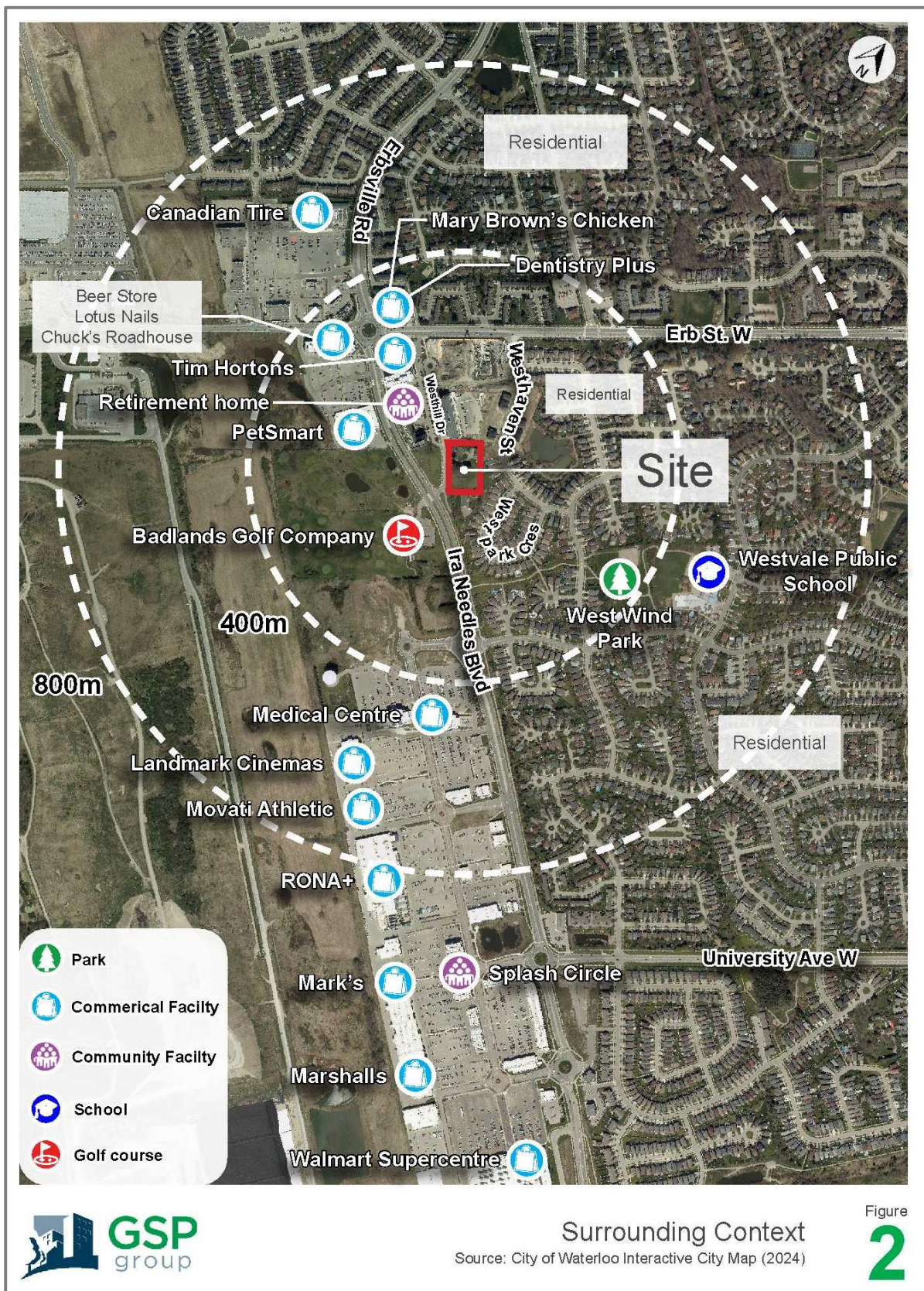
The Site is proximate to a range of existing Grand River Transit (“GRT”) services, including GRT Route 13 and 29 along Ira Needles Boulevard to the north, iXpress Route 202 along Ira Needles Boulevard to the north, and Route 5 along Westvale Drive to the south. In addition, the Site is located approximately 350 metres north of the existing GRT Connecting Terminal located at The Boardwalk.



Site Location

Source: City of Waterloo Interactive City Map (2024)

Figure  
**1**



### 3. Proposed Development

The details of the Proposed Development are as follows:

- Building A: Situated along the southern property line, Building A includes a six-storey multi-unit residential building with an approximate height of 19.89 metres. Building A will include a total of 59 dwelling units, comprised of a combination of one-bedroom, two-bedroom and two-bedroom plus den dwelling units. Building A includes common ground floor, indoor amenity space and an associated outdoor landscaped patio areas, along with a common rooftop amenity space for residents. Each dwelling unit includes a private outdoor patio or balcony space. Building A includes a total of 780.4 square metres of amenity space.
- Building B: Situated along the Westhill Drive frontage, Building B includes an eight-storey multi-unit residential building with an approximate height of 25.76 metres. Building B contains 81 dwelling units, comprised of a combination of one-bedroom, two-bedroom and two-bedroom plus den dwelling units. Building B also includes common ground floor, indoor amenity space and an associated outdoor landscaped patio areas, along with a common rooftop amenity space for residents. Each dwelling unit includes a private outdoor patio or balcony space. Building B includes a total of 935.3 square metres of amenity space.

The Proposed Development includes a total of 140 parking spaces, distributed among surface and a two-storey parking structure located at the rear of the property; the Proposed Development includes a parking ratio of 1.0 spaces per unit. Out of these parking spaces, 128 parking spaces are allocated to residential units at a ratio of 0.91 spaces per unit, and 12 parking spaces are allocated to visitor parking at a ratio of 0.09 spaces per unit. A total of three Type A and four Type B barrier-free parking spaces are included within the proposed 140 parking spaces and are located adjacent to building entrances.

The Proposed Development includes a total of 86 bicycle parking spaces with 66 Type A spaces and 20 Type B spaces. The Type A bicycle parking spaces are provided within a bicycle storage room in each respective building.

The Proposed Development includes two vehicular access points along Westhill Drive; one located between Buildings A and B, and one located on the north side of the Site which passes through the north side of Building B, connecting to the surface and two-storey parking structure at the rear of the property.

BlackDoor (Westhill) Inc. is pursuing project financing through the Canada Mortgage and Housing Corporation (“CMHC”), which will require that a certain percentage of all units have rents that are considered affordable and/or attainable to low to medium-income of families.

The Proposed Development has been carefully designed to balance planning, financial, and construction realities. The eight-storey building is strategically located along Westhill Drive to maximize separation from adjacent low-rise homes while also delivering the density required to make the project feasible.

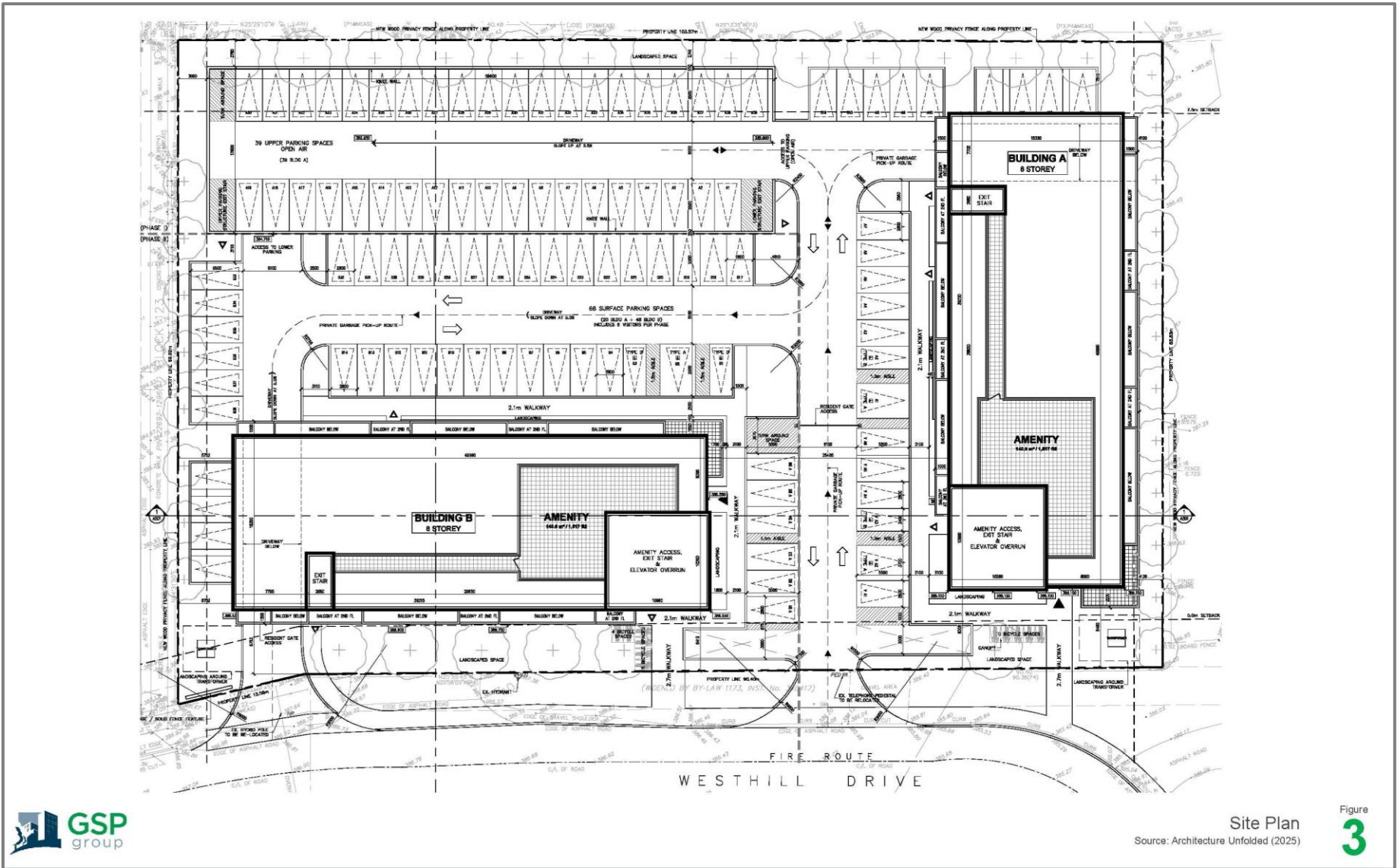
From a financial and technical perspective, the inclusion of the proposed eight-storey building (Building B) is critical. Ontario Building Code (OBC) requirements become significantly more onerous once a building exceeds six storeys. At seven storeys, those high-rise standards are triggered, but without enough added density to justify the substantial increase in cost, making seven storeys financial infeasible. In contrast, an eight-storey building provides the additional unit count needed to offset these higher construction and servicing costs.

The viability of the project depends on the combination of one six-storey building (Building A) and one eight-storey building (Building B). If both buildings were capped at six storeys, the overall density would be insufficient to cover the upfront municipal site-servicing extensions and construction expenses.

Equally important to the Proposed Development is the two-building, phase approached to construction. Delivering one six-storey and one eight-storey building allows the development to be phased. This phasing is critical to financing and absorption; the first building can be completed, stabilized, and refinanced while the second is still being absorbed and occupied. The proposed project phasing mitigates risk, supports financing, and ensures the development can move forward successfully.

All of these components have been very carefully considered in the context of the initial feedback provided by staff as part of pre-submission consultation and correspondence.

The Proposed Development is shown in **Figure 3**. Details of the Proposed Development are contained within Appendix A of this Report.



## 4. Summary of Supporting Studies

### 4.1 Preliminary Servicing Brief

A Preliminary Servicing Brief (“Servicing Brief”), dated August 21, 2025, was prepared by Meritech Engineering to identify potential constraints related to high ground water as well as summarize a strategy for sanitary sewerage, water supply and storm drainage/stormwater management.

The Servicing Brief noted the following:

- The Proposed Development will be serviced by an existing 400mm diameter watermain located on the east side of Westhill Drive
- The Proposed Development will be serviced by an existing 200mm diameter sanitary sewer located along Westhill Drive, which is required to be extended approximately 100 metres to the northwest corner of the Site
- The Proposed Development will be serviced by two existing storm sewers near the northwest corner of the Site; all on-site stormwater management sewers will connect to the existing storm services off site

The Servicing Brief also outlines design considerations for stormwater quantity and quality control, water balance and infiltration, source water protection and erosion and sediment control.

Please review to the complete Servicing Brief for further details.

### 4.2 Environmental Noise Feasibility Study

An Environmental Noise Feasibility (“Noise Study”) dated August 22, 2025, was completed by Trinity Valcoustics Canada Ltd. to assess the potential impacts of transportation noise sources and stationary noise sources on the Proposed Development.

The Noise Study assessed potential transportation noise impacts from road traffic on Ira Needles Boulevard and Erb Street West.

The Noise Study assessed potential stationary noise impacts from the adjacent high-density residential uses and nearby commercial uses, including the adjacent apartment building, the Westhill Retirement Residence and the existing commercial uses on the west side of Ira Needles Boulevard.

The Noise Study recommend architectural and construction considerations and the inclusion of mandatory air conditioning to mitigate indoor noise levels, as well as the implementation of future noise warning clauses related to surrounding traffic noise sources.

The Noise Study concluded that with the considerations of the appropriate site design and mitigation measures noted above, the Proposed Development would feasibly adhere to the noise guidelines limits at neighbouring traffic and station noise sensitive receptors.

Please refer to the complete Noise Study for further details.

### **4.3 Transportation Impact Study**

A Transportation Impact Brief (“Transportation Brief”), dated August 13, 2025, was prepared by Paradigm Transportation Solutions Limited to forecasts the impacts of site-generated traffic at nearby existing and proposed intersections, and identify any remedial measures, if necessary. The Transportation Brief also provided a summary of Transportation Demand Management strategies and tools that could be implemented as part of future detailed design.

The Transportation Brief included the following conclusions and recommendations:

- The Proposed Development is forecasted to generate 50 trips in the weekday AM peak hour and 55 trips in the weekday PM peak hour
- All intersections are currently operating within acceptable levels of services and anticipated to operate within acceptable levels under future traffic conditions

Please refer to the complete Transportation Brief for further details.

### **4.4 Pedestrian Wind Assessment**

A Pedestrian Wind Assessment (“Wind Assessment”), dated August 21, 2025, was prepared by RWDI to assess potential wind impacts on pedestrian areas in and around the Proposed Development. The Wind Assessment includes the consideration of historical meteorological data related to local wind conditions, based on hourly wind data, and the assessment of wind frequency and direction for the summer and winter seasons.

The Wind Study included the following conclusions and recommendations:

- The entrances for Building A and B have both been designed with a vestibule and canopy, which is positive feature for user comfort and door openability; these features should be retained in the final design.
- Slightly higher wind speeds are expected in front of the Building B entrance; if desired, wind speeds can be lowered by recessing the building entrance into the building façade and/or adding wind screens or tall planters on either side of the entrance
- Wind conditions at all pedestrian areas at grade are predicted to be comfortable for walking or better throughout the year
- While wind conditions are generally expected to be acceptable for both ground floor public amenity areas, the wind conditions around Building A are predicted to be higher than those desired for passive activities. It is recommended that the ground floor amenity are for Building A incorporate landscape elements to reduce wind speeds
- Wind speeds on the rooftop terrace are generally expected to be comfortable for use in the summer

Please refer to the complete Wind Study for further details.

#### **4.5 Urban Design Brief**

An Urban Design Brief, dated August 2025, was prepared by GSP Group to provide an overview of the urban design principles that will guide the detailed design of the Site to ensure the development is compatible with its contexts and meets all policy and regulatory objectives of the City. The Urban Design Brief also includes the required Shadow Study.

The Urban Design Brief concluded that the Proposed Development represents a thoughtfully designed intensification project that aligns with the City's Official Plan and Urban Design Guidelines.

Please refer to the complete Urban Design Guidelines for further details.

## 5. Planning Policy Overview

### 5.1 Ontario Planning Act

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 process.

The Planning Act requires that all planning decisions shall have regard to matters of Provincial interests as identified in Section 2. The following table provides an analysis of the Proposed Development in response to the prescribed Provincial interest of Section 2 of the Planning Act.

|     |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                   |
|-----|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | The protection of ecological systems, including natural areas, features, and functions;                                  | <i>The Site does not contain any natural areas, features, and/or functions. The Proposed Development will not impact any ecological systems located on the Site or adjacent to the Site.</i>                                                                                                                                                                      |
| (b) | The protection of the agricultural resources of the Province;                                                            | <i>The Site is located within the City of Waterloo’s Built-Up Area on land currently designated for residential purposes. The Proposed Development will not negatively impact the agricultural resources of the Province.</i>                                                                                                                                     |
| (c) | The conservation and management of natural resources and the mineral resource base;                                      | <i>The Site is located within the City of Waterloo’s Built-Up Area on land currently designated for residential purposes. The Proposed Development will not negatively impact the conservation and management of natural resources and the mineral resource base.</i>                                                                                             |
| (d) | The conservation of features of significant architectural, cultural, historical, archaeological, or scientific interest; | <i>Not applicable.</i>                                                                                                                                                                                                                                                                                                                                            |
| (e) | The supply, efficient use and conservation of energy and water;                                                          | <i>The Proposed Development will be fully serviced by municipal water and sanitary services, which have sufficient capacity to accommodate the Proposed Development.</i><br><br><i>The provision of other utilities will be coordinated during the Site Plan Approval process after consideration of the Official Plan Amendment and Zoning By-law Amendment.</i> |

|       |                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (f)   | The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems; | <i>The Proposed Development will utilize existing communication, transportation, sewage and water services and waste management systems, which are of sufficient capacity to accommodate the Proposed Development and will continue to be used efficiently in the future. The provision of these utilities will be coordinated during the Site Plan Approval process after consideration of the Official Plan Amendment and Zoning By-law Amendment.</i>                                                                                                                                                                                                    |
| (g)   | The minimization of waste;                                                                                                         | <i>The Proposed Development will be required to adhere to the Resource Recovery and Circular Economy Act, S.O. 2016, Chapter 12, Schedule 1 and the requirements contained therein with respect to waste diversion and management.</i>                                                                                                                                                                                                                                                                                                                                                                                                                      |
| (h)   | The orderly development of safe and healthy communities;                                                                           | <i>The Site is located within the existing Built-Up Area, with existing development or development currently under construction surrounding the majority of the property; the Proposed Development represents the logical and orderly development of an existing, underutilized urban property.</i><br><br><i>The Proposed Development presents a well-designed site layout which is consistent with surrounding development, contributing to the orderly development of safe and healthy communities. The Proposed Development has been designed to include safe access to and from the Site to Westhill Drive, which is identified as a Local Street.</i> |
| (h.1) | The accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;                 | <i>The Proposed Development will be compliant with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11. In addition, CHMHC funding includes additional accessibility requirements and standards, which will also be adhered to as part of future development.</i><br><br><i>Specific details will be confirmed during Site Plan Approval.</i>                                                                                                                                                                                                                                                                                     |
| (i)   | The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;                     | <i>The Site is proximate a broad range of existing commercial, community and institutional uses, and is located along a number of existing GRT routes. The Proposed Development will utilize existing educational, health, social, cultural, and recreational facilities which are in proximity to the Site.</i>                                                                                                                                                                                                                                                                                                                                            |
| (j)   | The adequate provision of a full range of housing, including affordable housing;                                                   | <i>The Proposed Development includes the construction of 140 dwelling units in one-bedroom, two -bedroom and two-bedroom with den unit configurations, which contributes to the provision of a full range of housing for families of differing sizes. Medium-density residential units are typically more affordable than lower-density residential units.</i>                                                                                                                                                                                                                                                                                              |

|     |                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                 | <i>The Proposed Development is intended to be financed through CMHC, which requires that a certain percentage of units be dedicated as affordable and/or attainable housing dwellings.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| (k) | The adequate provision of employment opportunities;                                             | <i>The construction of the Proposed Development will generate short- to medium-term employment opportunities within the construction industry.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| (l) | The protection of the financial and economic well-being of the Province and its municipalities; | <i>The Proposed Development does not require any financial commitment from the Region of Waterloo or the City of Waterloo for the provision of infrastructure. The Site is adequately serviced by existing services, and it will be the responsibility of the Owner for the costs associated with the provision of any necessary infrastructure required to accommodate the Proposed Development.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| (m) | The co-ordination of planning activities of public bodies;                                      | <i>The proposed applications for Official Plan and Zoning By-law Amendment will be circulated to all commenting agencies, departments, and interest holders by the City for review and comments prior to the Council's decision regarding the Proposed Development.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| (n) | The resolution of planning conflicts involving public and private interests;                    | <i>Resolution of planning conflicts that may arise through consideration of the Proposed Development will be addressed as part of the circulation and review process, which will include formal and informal public meetings, as required by the Planning Act.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| (o) | The protection of public health and safety                                                      | <i>The Proposed Development will not impact public health and safety. The Proposed Development is logically designed to be compatible and consistent with the surrounding neighbourhood.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| (p) | The appropriate location of growth and development;                                             | <p><i>The Site is located on the periphery of an established low-rise residential neighbourhood and is adjacent to other, existing medium- and high-density residential uses. The Proposed Development will help to create a gradual transition in density and height toward Ira Needles Boulevard from adjacent low-density residential uses. Westhill Drive connects to Ira Needles Boulevard, an arterial road, which provides a connection to various retail and commercial necessities which support the Proposed Development.</i></p> <p><i>As an undeveloped Site located on the periphery of an existing residential neighbourhood, the Proposed Development requires the extension of services from the north along Westhill Drive with a significant associated cost. The Proposed Development includes future densities that will help off-set some of the costs associated with development of this vacant urban Site.</i></p> |
| (q) | The promotion of development that is designed to be                                             | <i>The Site is in proximity to a number of existing GRT routes. These transit routes connect to the nearby</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|     |                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | sustainable, to support public transit and be oriented to pedestrians;                                                                                                                                                                                                       | <i>Boardwalk Station, providing a connection to GRT's broader network. The broader GRT network provides regional transit connection opportunities, including GO Transit bus and train service as well as VIA Rail service.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| (r) | <p>The promotion of built-form that,</p> <ul style="list-style-type: none"> <li>(i) is well-designed,</li> <li>(ii) encouraged a sense of place, and,</li> <li>iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant</li> </ul> | <p><i>The Proposed Development contributes to the promotion of a built form that is well-designed and encourages a sense of place. Building B is oriented to face Westhill Drive, ensuring that parking is screened from the street.</i></p> <p><i>Building A is oriented to be perpendicular to Westhill Drive, allowing for the accommodation of a vehicular access route between Buildings A and B. The Site's two vehicular access points onto Westhill Drive ensure that sufficient circulation is provided within the Site, as well as onto Westhill Drive. Please refer to the Urban Design Brief prepared by GSP Group for more information regarding the design of the Site and the Proposed Development..</i></p> <p><i>The Proposed Development encourages a sense of place, featuring ample amenity space, including a ground-floor amenity room as well as rooftop amenity space in both Buildings A and B, respectively.</i></p> <p><i>The Site is located adjacent to many transit and pedestrian connections, and its broader neighbourhood contains a wide variety of amenities such as retail, commercial, employment, recreation, and other such amenities.</i></p> |
| (s) | The mitigation of greenhouse gas emissions and adaptation to climate change.                                                                                                                                                                                                 | <p><i>The Proposed Development will result in a compact urban form of development that efficiently uses land and existing infrastructure. The concentration of development around the Site, as well as the provision of transit near the Site, will help to limit automobile dependency.</i></p> <p><i>The Proposed Development has been designed to ensure matters such as stormwater are adequately controlled on the Site. Further measures related to sustainability and energy efficient will be detailed as part of future Site Plan Approval.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

Based on the above-noted commentary, it is my opinion that the Proposed Development has regard to the applicable matters of Provincial interest as identified in the Planning Act.

## 5.2 Provincial Planning Statement

The Provincial Planning Statement, 2024 (“PPS”) provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use 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 October 20, 2024. The following provides a summary of the key PPS policy considerations for the Site and provides justification for the Proposed Development as it relates to these policies.

Policy 2.1.6 (a) of the PPS states that complete communities will be achieved by accommodating an appropriate range and mix of housing options, transportation options, employment, public service facilities, institutional uses, recreational and parks and open space uses.

*Response: The Proposed Development will contribute 140 dwelling units, including a mixture of one- and two-bedroom units, to the broader established neighbourhood, contributing to the completion of the existing greenfield neighbourhood. The Proposed Development will support the GRT’s transit network as well as surrounding commercial, employment, institutional, recreational and parks and open space uses.*

Policy 2.2.1 states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents by:

- a) Establishing and implementing minimum targets for the provision of housing that is affordable... and coordinating land use planning for housing to address a full range of housing options, including affordable housing needs.
- b) permitting and facilitating all housing options required to meet the varying requirements of current and future residents (1), and all types of residential intensification, including new housing options within previously developed areas and redevelopment which results in a net increase of residential uses (2).
- c) promoting densities for new housing which efficiently use land, resources, infrastructure, and public service facilities, and support the use of active transportation.

*Response: The Proposed Development is intended to be financed through CMHC, which requires that a certain percentage of units be dedicated as affordable and/or attainable housing dwellings. The Proposed Development includes the construction of two (2) mid-rise apartment buildings with a total of 140 dwelling units, representing residential intensification. The multi-unit residential building form of the Proposed Development*

*efficiently uses land, resources, infrastructure, and public services, as well as supports the use of active transportation.*

*While the Proposed Development will make use of existing municipal infrastructure and services, these services are required to be extended from their existing terminus to the north of the Site. In an effort to help offset the costs associated with the extension of municipal services, the Proposed Development has been designed to achieve medium-density and intensification.*

Policy 2.3.1.1 states that settlement areas shall be the focus of growth and development. Policy 2.3.1.2 further states that land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a) efficiently use land and resources;
- b) optimize existing and planned infrastructure and public service facilities;
- c) supports active transportation; and,
- d) are transit supportive.

*Response:* *The Proposed Development is located within Built-Up Area, which is the focus of growth and development. The Proposed Development includes the construction of two (2) multi-unit residential buildings, which efficiently use land and resources to provide an increase in density on the Site. The Proposed Development optimizes existing and planned infrastructure and public facilities, with the existing services on the Site having sufficient capacity to accommodate the Proposed Development. The Proposed Development is located adjacent to Ira Needles Boulevard and Erb Street West, which have existing active transportation infrastructure and accommodate existing transit services. The Proposed Development includes 86 bicycle parking spaces, which supports active transportation.*

Policy 2.3.1.3 directs general intensification and redevelopment to support the achievement of complete communities by planning for a range and mix of housing options and prioritizing investment in the necessary infrastructure and public service facilities.

*Response:* *The Proposed Development represents urban intensification that is well serviced by existing roads, municipal infrastructure and transit services; the Site is the ideal type of development and intensification as contemplated by the PPS in existing settlement areas. The Proposed Development will add to the range and mix of housing options available within the community, providing housing options for residents in a variety of stages of life*

In summary, the Proposed Development has regard for the PPS as it promotes efficient land use and development within the delineated Built-Up Area through residential

intensification. The construction of two (2) multi-unit residential buildings with a total of 140 units contributes to the achievement of complete communities by creating a compact built form with a mixture of unit typologies. The Site is well serviced by existing municipal infrastructure, including water and sewage services, which have sufficient capacity to support the Proposed Development. The Site's adjacency to transit and the provision of active transportation amenities, such as bicycle storage, support the utilization of transit and active transportation and promote the reduction of automobile usage. Overall, the Proposed Development makes efficient use of the Site, infrastructure, and public service facilities, and has regard for the PPS.

### 5.3 Region of Waterloo Official Plan

The Regional Official Plan ("ROP") was approved by the Ministry of Municipal Affairs and Housing, with modifications, on December 22, 2010, and approved with amendments by Oral Decision of the Ontario Municipal Board on June 18, 2015.

Regional Official Plan Amendment 6 ("ROPA 6"), which establishes the planning framework for accommodating forecasted population and employment growth within the Region to 2051, was approved by the Minister of Municipal Affairs and Housing on April 11, 2023. ROPA 6 established a new policy framework with the implementation of Chapter 2 – Where and How to Grow, as well as new housing policies in Section 3.A, among other policy matters.

The following is a review of the Proposed Development with respect to the relevant policies of the ROP.

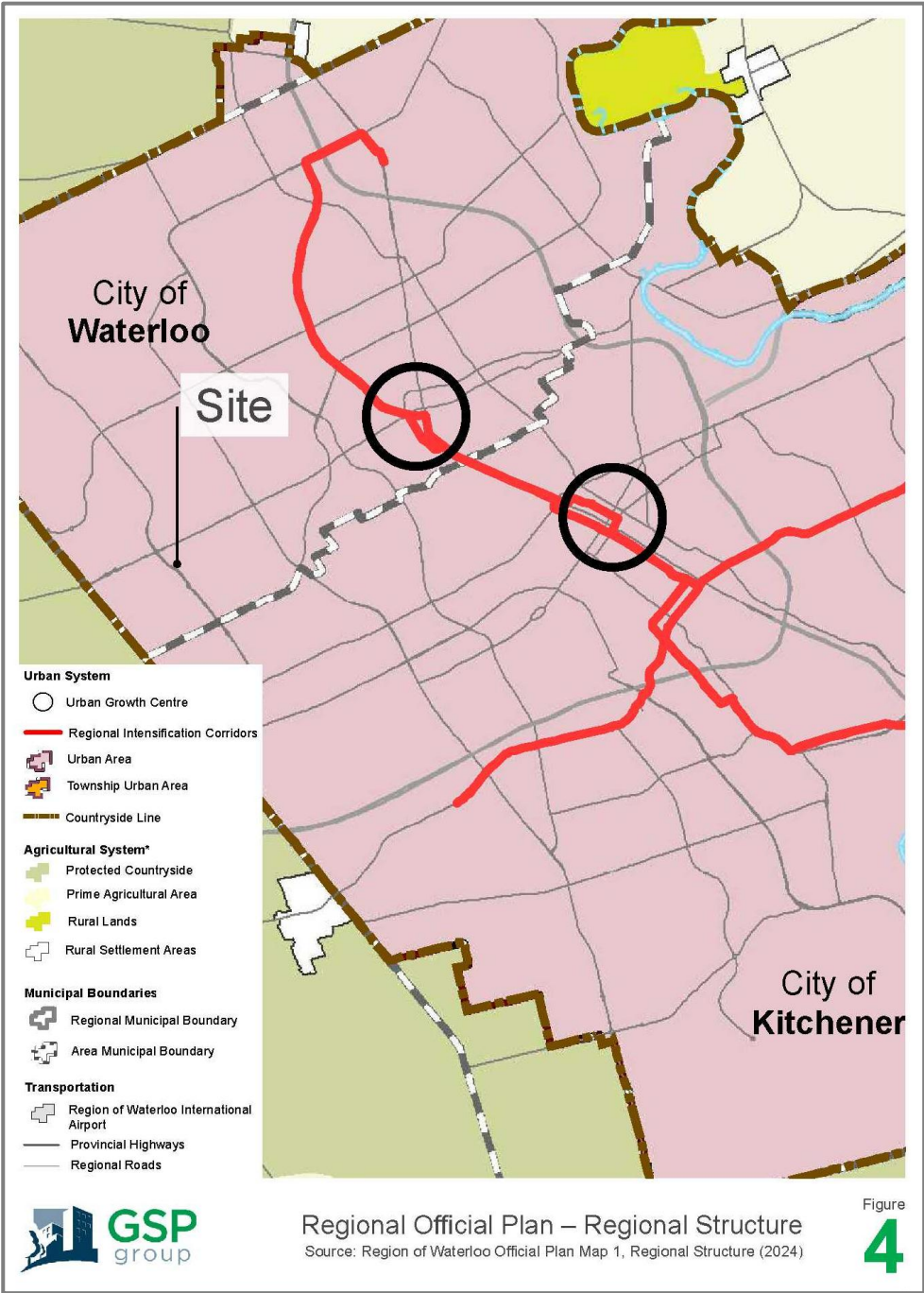
The Site is located within the Urban Area for the City of Waterloo (**Figure 4**) and identified as a Designated Greenfield Area (**Figure 5**) in the ROP.

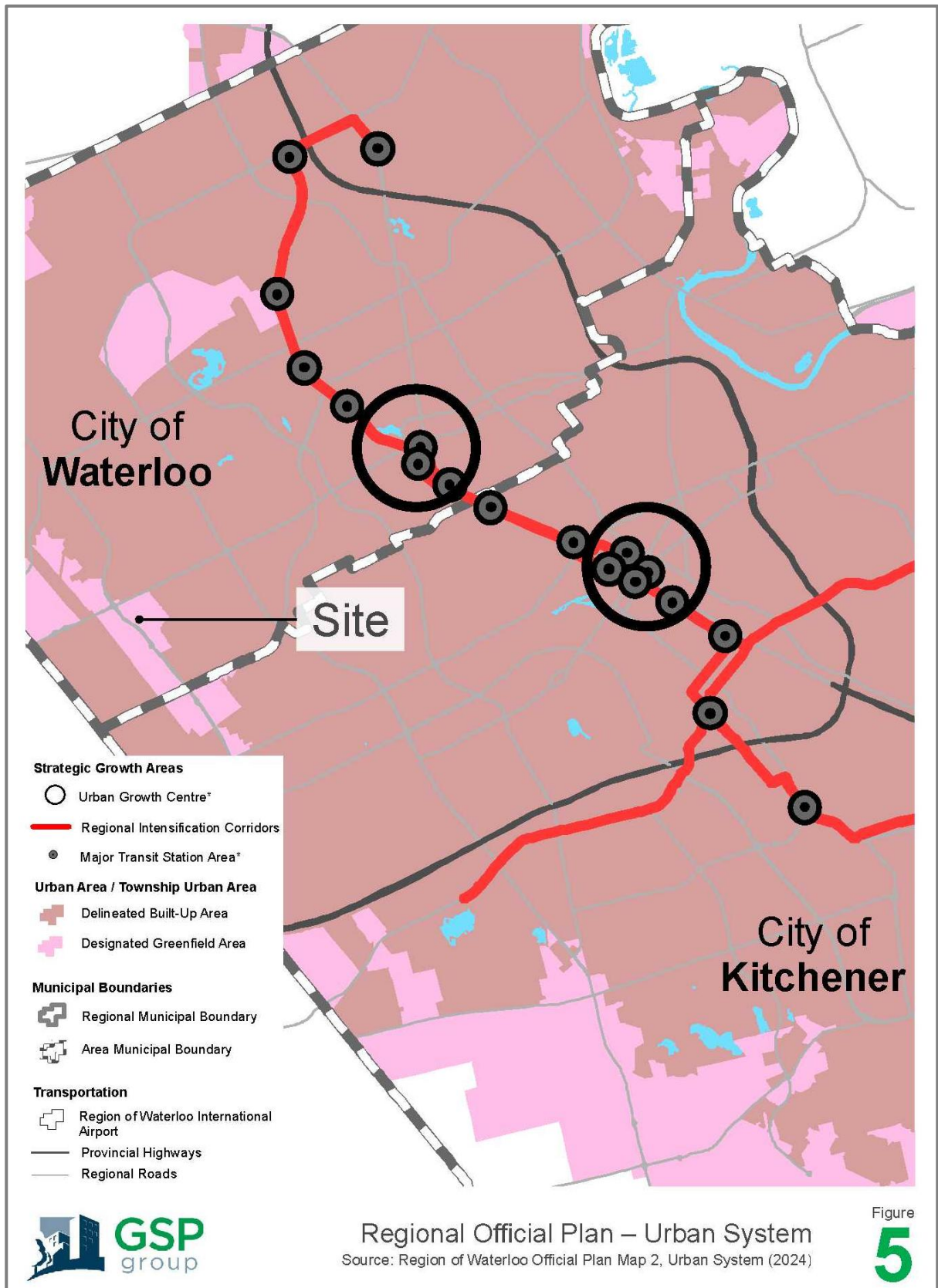
Policy 2.B.1.1 of the ROP states that the majority of forecasted population and employment growth will be directed to key structural components of the Regional urban system, including the Urban Area and Township Urban Areas (a) and Designated Greenfield Areas (d).

Policy 2.C.2.1 of the ROP states that land within the Urban Area is intended to accommodate the largest share, almost 90 percent, of the Region's population and employment growth.

***Response:** The Site is located within the City of Waterloo's Urban Area and is identified as Designated Greenfield Area. The Site is surrounded by an abundance of community,*

commercial, retail, institutional, and open space uses and utilizes underutilized land immediately adjacent to medium- to high-density residential uses, making it an ideal location for residential intensification. The Proposed Development will contribute to the Region’s target of accommodating the majority of future population and employment growth within the existing urban area.





Policy 2.C.2.2 states that area municipalities will develop official plan policies and implementing zoning by-laws to ensure that development occurring within the Urban Area is planned and developed in a manner that:

|      |                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (b)  | advances the community's transition into an energy-efficient, resilient, low-carbon community by:                                                                               | <i>The Proposed Development represents a compact built form for multi-unit residential development.</i>                                                                                                                                                                                                                                                                                                                                                   |
| (i)  | Promoting a more compact built form that enables a modal shift to most trips being made by walking, cycling, and rolling;                                                       | <i>The Site is proximate to existing transit, cycling and pedestrian networks and the Proposed Development features provisions that support a modal shift towards cycling and transit.</i>                                                                                                                                                                                                                                                                |
| (ii) | contributing to the creation of 15-minute neighbourhoods;                                                                                                                       | <i>The Site is located near The Boardwalk and other commercial, retail, and office plazas. The Proposed Development will be in proximity to a range of commercial and retail uses to meet the daily needs of residents, including grocery stores, pharmacies and restaurants. Furthermore, the Site is proximate to existing GRT transit services and the Boardwalk transit terminal , all contributing to the creation of a 15-minute neighbourhood.</i> |
| (c)  | is serviced by a municipal water and wastewater system;                                                                                                                         | <i>The Site will be serviced by the existing municipal water and wastewater system, which has sufficient capacity to accommodate the Proposed Development.</i>                                                                                                                                                                                                                                                                                            |
| (d)  | protects the natural environment, including the Grand River and its tributaries, and surface water and groundwater resources;                                                   | <i>There are no natural features on the Site, nor are there any adjacent to the Site that would be impacted by the Proposed Development.</i>                                                                                                                                                                                                                                                                                                              |
| (e)  | provides a diverse range and mix of housing options;                                                                                                                            | <i>The Proposed Development will introduce 140 dwelling units in the form of one- and two-bedroom dwelling units, which contributes to a diverse range and mix of housing options, accommodating families of differing sizes.</i>                                                                                                                                                                                                                         |
| (g)  | avoids development and land use patterns that may pose a risk to public health, safety, and the environment;                                                                    | <i>The Proposed Development features a logical site layout for residential development that is compatible with adjacent development. The Proposed Development poses no risk to public health, safety, and/or the environment.</i>                                                                                                                                                                                                                         |
| (h)  | improves accessibility for persons of all ages and abilities and at all times of the year by addressing built form barriers which restrict their full participation in society; | <i>The Proposed Development will be compliant with the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11. Specific details will be confirmed during Site Plan Approval.</i>                                                                                                                                                                                                                                                       |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (i) | ensures the development of high-quality urban form through site design and urban design standards that create an attractive and vibrant public realm;                                                                                                                                                                                                                                                                | <i>The Proposed Development will result in the creation of a high-quality urban form. Please refer to the Urban Design Brief prepared by GSP Group Inc. for an analysis of the applicable urban design policies and guidelines.</i>                                                                                                                                                                                                                  |
| (j) | <p>expands residents' convenient access to:</p> <p>(i) a range of transportation options, including to a mobility network that is safe, comfortable, and convenient for walking, cycling, and rolling for people of all ages and abilities and at all times of the year;</p> <p>(ii) An appropriate supply of safe, accessible urban greenlands pen spaces, parks, trails and other opportunities for recreation</p> | <p><i>The Site is in proximity to existing transit services along Ira Needles Boulevard and Erb Street. These transit services connect to the nearby Boardwalk transit terminal, providing a connection to the broader transit network.</i></p> <p><i>The Site is within walking distance to a number of parks, open space uses, trails and community uses within the Westvale community, providing a range of opportunities for recreation.</i></p> |

Table 3 of the ROP identifies minimum annual intensification targets by municipality. The City of Waterloo has a minimum intensification target of 83%, with a minimum of 19,740 total units expected in the Built-Up Area by 2051.

*Response:* *The Proposed Development will assist the City of Waterloo in achieving the minimum intensification target identified in the ROP.*

Policy 2.G.1.2 of the ROP states that area municipalities, in collaboration with the Region, will ensure that new development taking place in Designated Greenfield Areas will be planned, designated, zoned, and designed to adhere to the following applicable policies:

|     |                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | function as 15-minute neighbourhoods with a broad mix of land uses where people can meet their daily needs for goods, services, and employment within a 15-minute trip by walking, cycling and rolling, and where other needs can be met by using direct, frequent and convenient transit; | <i>The Site is located within walking distances to Waterloo Commons, West Quarter Plaza, and The Boardwalk, which constitutes a broad mix of land uses where people can meet their daily needs for goods, services, and employment within a 15-minute trip by walking, cycling, and rolling. Similarly, existing transit services are located along Ira Needles Boulevard and Erb Street West, which connect to the Boardwalk transit terminal, providing transit access to GRT's broader Regional network.</i> |
| (b) | promote a more compact built form by meeting or exceeding the minimum density targets set out in Table 4                                                                                                                                                                                   | <i>Based on the Region of Waterloo 2024 Water and Wastewater Monitoring Report, "apartment" dwellings are assumed to a per unit rate of 1.77 persons. With a total of 140 dwelling units, the Proposed Development is projected to have an approximately population of 248</i>                                                                                                                                                                                                                                  |

|     |                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | [Minimum Density Target for the City of Waterloo is 54 residents and jobs combined per gross hectare];                                                                                                                                                                                                                       | <p>people and jobs per hectare, which exceeds the ROP's requirement of 54 residents and jobs combined per gross hectare, demonstrating the development of a more compact built form.</p> <p><i>It is important to note that in accordance with Policy 2.G.1.3, minimum density targets are to be calculated over the entire designated greenfield area. While the specific density of the Proposed Development exceeds the density target on the Site as identified in Table 4 for Waterloo, it will greatly contribute to the ability of the entire greenfield area for the City of Waterloo to achieve the minimum density target of 54 people and jobs per hectare.</i></p> |
| (c) | prioritize walking, cycling, and rolling, and taking transit over automobile trips by establishing a network of continuous sidewalks, trails and bicycle lanes that provide direct, safe, comfortable and well-maintained access to a variety of destinations for people of all ages and abilities at all times of the year; | <i>Ira Needles Boulevard and Westhill Drive include a network of continuous sidewalks. In addition, there is a City-owned trail along the north edge of the Site, providing a connection to Westhaven Street. Similarly, bicycle lanes are provided along Ira Needles Boulevard and Erb Street West, providing for direct, safe, comfortable, and well-maintained walking, cycling, and rolling routes.</i>                                                                                                                                                                                                                                                                    |
| (i) | are serviced by a municipal water and wastewater system.                                                                                                                                                                                                                                                                     | <i>The Proposed Development will be serviced by the existing municipal water and wastewater system, which has sufficient capacity to accommodate the Proposed Development.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

Policy 3.A.2 of the ROP states that area municipalities will plan to provide a diverse range and mix of housing options with an overall target of 30% of new ownership and rental housing being affordable for low to moderate income households. Policy 3.A.17 further states that development applications proposing residential units will be required to indicate if and how they are contributing to affordable housing and should include an assessment of the mix and range of types, bedroom mix, unit size, tenures, and accessibility requirements.

*Response:* *The Proposed Development includes the construction of 140 residential units, including one-bedroom and two-bedroom units as well as accessible units, which contributes to a range of typologies, bedroom mix, unit size, and accessibility requirements. As noted previously, BlackDoor (Westhill) Inc. is pursuing project financing through the Canada Mortgage and Housing Corporation ("CMHC"), which will require that a certain percentage of all units have rents that are considered affordable and/or attainable to low to medium-income of families.*

In summary, the Proposed Development conforms with the ROP by facilitating residential intensification within the Designated Greenfield Area and Urban Area of the City of Waterloo. The Proposed Development will deliver 140 new residential units, which contributes to a diverse range and mix of housing options. The Site is well connected to the GRT network and is located within walking distance to many retail/commercial and employment uses, enabling access to daily needs within a 15-minute walk. The Proposed Development will be fully serviced by existing municipal water and sanitation infrastructure, which has sufficient capacity to accommodate the Proposed Development. Overall, the Proposed Development features a compact built form with a site design that is compatible with surrounding uses, ensuring seamless integration, exceeding minimum density targets, and supporting the Region of Waterloo's goals for sustainable, transit-supportive residential intensification.

Please note that as of January 1, 2025, in accordance with the Province of Ontario's *More Homes Built Faster Act* (Bill 23), all land use planning responsibilities of the Region of Waterloo were transferred to area municipalities. As of January 1, 2025, the City of Waterloo is responsible for all planning approvals and administering all Regional planning policies within the City of Waterloo. Until such time that the City of Waterloo Official Plan is updated to incorporate the policy directions and objectives of the ROP, the ROP will remain in effect and referenced by the City of Waterloo as part of the planning approval process.

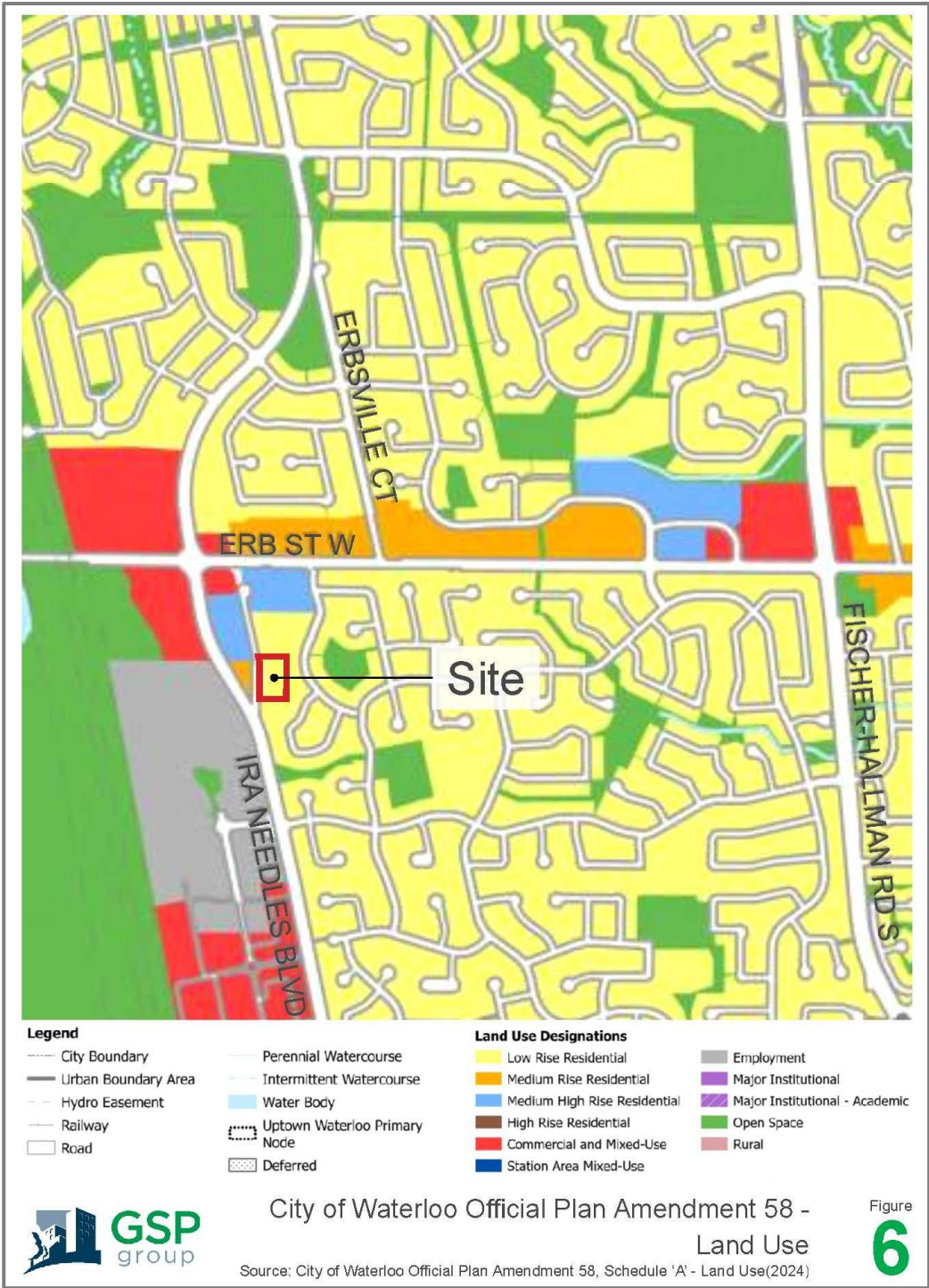
#### **5.4 City of Waterloo Official Plan (2012)**

The City of Waterloo Official Plan ("Official Plan") was adopted with modifications by City Council in 2012. The Official Plan identifies the City's vision for growth and changes within the community and sets out principles, objectives and policies designed to direct the form, extent, nature, and rate of growth and change within the City to 2031. The Official Plan includes changes to provincial policy since the previous consolidation, including the former Provincial Policy Statement and Places to Grow: Growth Plan for the Greater Golden Horseshoe.

The following provides a summary of the key policies of the Official Plan that apply to the Proposed Development, as well as planning commentary and justification in response to those applicable policies.

The Site is currently designated Low Density Residential in the Official Plan (**Figure 6**). Permitted uses within the Low/Medium Density Residential designation include a variety of low-density residential forms, such as single-detached dwellings. Multi-unit residential buildings are not a permitted use within the 'Low Density Residential' designation. The

proposed application for Official Plan Amendment seeks to redesignate the Site to Mixed-Use Medium Density Residential to permit the Proposed Development.



Policy 3.2.1 of the Official Plan states that the City of Waterloo shall expect to accommodate a population of 137,000 people by 2029, as outlined in the ROP. Policy 3.3 of the Official Plan states that a minimum of 45 percent of residential development is to occur within the City’s Built-up Area.

Policy 3.4.1 c) further states that the maximum height within the Medium Density designation will be 20.0 metres. Policy 3.4.2 c) permits a maximum of 450 bedrooms per hectare within the Mixed-Use Medium Density designation.

*Response:* *The Site is located within the City’s Built-up Area and will contribute to the City’s target of 45% for residential development in the Built-up Area.*

*The Proposed Development includes a total of 140 units multi-unit residential dwelling units. The Proposed Development includes one six-storey building with a maximum height of 19.89 metres and one eight-storey building with a maximum height of 25.76 metres. While Building A (six-storeys) conforms with the Official Plan by not exceeding a maximum building height of 20 metres, Building B (eight-storeys) provides for a building height that slightly exceeds this, which will be addressed through the establishment of Specific Provision Area. Justification for the proposed increased in maximum building height will be provided further in this Report.*

*The Proposed Development includes a total of 140 units multi-unit residential dwelling units, with a total of 188 bedrooms; this results in an approximate density of 277 bedrooms per hectare which is less than the maximum density of 450 bedrooms per hectare permitted in the Mixed-Use Medium Density designation.*

Policy 10.1.1(12) of the Official Plan states that development applications proposing to redesignate lands to the Mixed-Use Medium Density Residential designation may be contemplated based on 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 lands designated Low Density Residential; | <p><i>The Proposed Development will have an approximate density of 277 bedrooms per hectare and provides for an appropriate height and density transition, buffering adjacent low-density residential uses to the east of the Site from the adjacent high-density residential and commercial uses to the northwest and west of the Site.</i></p> <p><i>The Proposed Development has been strategically designed to situate the proposed eight-storey building closest to Westhill Drive, to maximize separation from adjacent low-rise residential development while delivering</i></p> |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|     |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                          | <p><i>density required to make the project feasible. The combination of the proposed eight-storey building and six-storey building is fundamental to the financial viability of the Proposed Development in terms of future density and the transition between the two buildings is intentional.</i></p> <p><i>From a financial and technical perspective, the inclusion of the proposed eight-storey building is critical. Ontario Building Code (OBC) requirements become significantly more onerous once a building exceeds six storeys. At seven storeys, those high-rise standards are triggered, but without enough added density to justify the substantial increase in cost, making seven storeys financial infeasible; an eight-storey building provides the additional unit count needed to offset higher construction. The viability of the project depends on the combination of one six-storey building (Building A) and one eight-storey building (Building B).</i></p> <p><i>Phased construction is also a key consideration of the Proposed Development. The construction of one six-storey is critical to financing and absorption. The proposed project phasing mitigates risk, supports financing, and ensures the development can move forward successfully.</i></p> |
| (d) | The proposal achieves the applicable performance standards set out in this Official Plan and implementing Zoning By-Law; | <i>The Proposed Development achieves the applicable performance standards set out in the Official Plan and includes requested site-specific amendments to the proposed RMU-20 Zone for minimum landscaped open space, building height and parking.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| (e) | Surface parking is minimized in favour of more intensive forms of parking;                                               | <i>Given the mid-rise nature of the Proposed Development, surface and structure parking is the only financially viable option. However, the Proposed Development has been designed to provide for a combination of surface and structured parking that is screened from public view by the placement of Buildings A and B, and the provided parking has been reduced from the requirement outlined in the Zoning By-law due to the Site's adjacency to transit along Ira Needles Boulevard.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| (f) | Cultural heritage resources are conserved;                                                                               | <i>The Site does not contain any cultural heritage resources, and the Proposed Development will not impact any cultural heritage resources which are adjacent to the Site.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (g) | The proposal demonstrates a high standard of urban design;                                                                                                                                                                                                                                                                                                                                                                         | <i>The Proposed Development demonstrated a high standard of urban design. Please refer to the Urban Design Brief prepared by GSP Group Inc. for specific details related to the design of the Proposed Development</i>                                                                                                                                                                                             |
| (h) | The proposal identifies and implements any required transportation improvements, with a particular focus on transportation demand management measures;                                                                                                                                                                                                                                                                             | <i>The Proposed Development provides two vehicular access points to Westhill Drive, ensuring efficient circulation within the Site and to and from Westhill Drive.</i>                                                                                                                                                                                                                                             |
| (i) | Medium to high density residential uses is located with direct vehicular access to arterial or collector roads to the extent possible. Where such access is deemed by the City to be undesirable or not feasible, vehicular access may be provided by local streets if traffic is directed to the nearest arterial or collector road via a route that minimizes vehicular travel within the low-density residential neighbourhood; | <i>The Site is located on Westhill Drive, which is identified as a local street in the ROP. Westhill Drive directly connects to Ira Needles Boulevard, an arterial road. The Proposed Development does not include any access that impact the adjacent low-density residential uses, and appropriate separation is provided between the Site and the intersection of Westhill Drive and Ira Needles Boulevard.</i> |
| (j) | Infrastructure capacity is not exceeded;                                                                                                                                                                                                                                                                                                                                                                                           | <i>All municipal servicing has sufficient capacity to accommodate the Proposed Development.</i>                                                                                                                                                                                                                                                                                                                    |
| (l) | The proposal satisfies all other applicable policies of this Official Plan.                                                                                                                                                                                                                                                                                                                                                        | <i>As discussed in this section of the Report, all other applicable policies of the Official Plan are satisfied.</i>                                                                                                                                                                                                                                                                                               |

Policy 10.1.2 (1) of the Official Plan states that the City will continue to plan for a range of housing types, including low density, medium density and high density housing. Policy 10.1.2 (2) further states that the City will support the efforts of the private sector to providing housing geared towards the needs of economically, socially, mentally and physically disadvantaged persons, which includes the provision of housing geared towards low-income households.

Policy 10.1.2 (13) states that regard shall be given to an adequate mix of rental and ownership units for a wide variety of household sizes when consideration development applications.

*Response: The Proposed Development includes a range of size and typologies of future dwelling units. Furthermore, in accordance with funding requirements of CMHC, the Proposed Development will include affordable and/or attainable housing units.*

Policy 10.1.3 (7) states that apartment dwellings may be considered an appropriate structure type in the Low-Density Residential designation in certain circumstances, and Policy 10.1.3 (8) outlines criteria to be considered when reviewing applications for Zoning By-law Amendment to permit apartments. While the application for Official Plan Amendment proposes to redesignate the Site as Mixed-Use Medium Density Residential, the following summarizes the criteria of 10.1.3 (8) and provides justification as to why the Proposed Development is appropriate in this circumstance:

|     |                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | The property is not located within a Heritage Conservation District;                                                                                                                                                                                                                                                                    | <i>The Site is noted located within a Heritage Conservation District.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| (b) | Terrace dwellings and or apartments represent an appropriate and desirable land use for the neighbourhood;                                                                                                                                                                                                                              | <p><i>The Proposed Development includes two (2) mid-rise apartment buildings on the periphery of an existing low density residential community and is consistent with surrounding existing and future mid-rise and high-residential uses on Westhill Drive and Erb Street West.</i></p> <p><i>The Proposed Development has been strategically designed to situate the proposed eight-storey building closest to Westhill Drive, optimizing the buffer between the adjacent low rise residential uses. As noted above, the combination of the proposed eight-storey building and six-storey building is fundamental to the financial viability of the Proposed Development.</i></p> |
| (c) | Terrace dwellings and or apartments will not destabilize the neighbourhood;                                                                                                                                                                                                                                                             | <p><i>The Proposed Development will be accessed by Westhill Drive; it does not include any access through the existing low density residential to Westhaven Street.</i></p> <p><i>The Proposed Development has been situated closer to the Westhill Drive frontage, maximizing the separation between adjacent low density residential uses.</i></p>                                                                                                                                                                                                                                                                                                                               |
| (d) | <p>The proposal will achieve a high standard of urban design, with emphasis on:</p> <ul style="list-style-type: none"> <li>(i) Site and building design that complement and enhance the surrounding neighbourhood character;</li> <li>(ii) Landscape design that creates visual interest, 'green' the site, and buffer; and,</li> </ul> | <p><i>The Proposed Development has been situated to maximize the separation from adjacent low density residential uses and has been designed to incorporate landscape buffers along the shared property line.</i></p> <p><i>The Proposed Development includes landscape buffers around the perimeter of the property as well as each building includes a small patio amenity space</i></p>                                                                                                                                                                                                                                                                                         |

|     |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----|---------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | (iii) Prominent entrances that emphasize the streetscape                                                                              | <p><i>that will include enhanced landscape features.</i></p> <p><i>The Proposed Development has been oriented towards Westhill Drive and provides for prominent driveway entrances as well as pedestrian connections. The Proposed Development includes an adequate setback from Westhill Drive, providing opportunities for appropriate landscape treatments and tree planting.</i></p>                                                                                                                                                                                                                                                                                                                                                       |
| (e) | Sufficient infrastructure exists to service the site                                                                                  | <i>All municipal servicing has sufficient capacity to accommodate the Proposed Development.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| (f) | The development capacity of the site is not exceeded, and the proposal does not require significant relief from standard regulations; | <p><i>The Proposed Development conforms with most of the development standards, with the exception of some minor variances to regulations pertaining to open space, setbacks and parking.</i></p> <p><i>As noted previously, the Proposed Development requires the extension of municipal services from the existing terminus to the north, as well as includes additional construction considerations for Building B in accordance with the Ontario Building Code as it is beyond six-storeys in height. The development capacity of the Site had been optimized by the design of the Proposed Development while still remaining within the range of density and height permissions and objectives contemplated in the Official Plan.</i></p> |
| (g) | The development maintains the land use intensity of the surrounding low density residential neighbourhood;                            | <p><i>The Site is surrounded by existing and future mid-rise and high-rise residential development as well as low-rise residential uses; the Proposed Development provides for the same type of intensification as those surrounding uses while been sensitive to and compatible with adjacent low rise residential uses.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                              |
| (h) | The development results in context-sensitive intensification in the low-density residential neighbourhood and,                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| (i) | The proposal complies with other criteria that may be deemed appropriate by the City based on the context of the site.                | <i>As discussed in this section of the Report, all other applicable policies of the Official Plan are satisfied.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

Policy 10.1.3 (9) outlines further locational criteria that should be considered when reviewing applications to amend the Zoning By-law to permit apartment buildings. Similarly, the Official Plan Amendment proposes to redesignate the Site as Mixed-Use Medium Density Residential, the following summarizes the criteria of 10.1.3 (9) and provides justification as to why the Proposed Development is appropriate at this location:

|     |                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                       |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | The property is located on the periphery of a low density residential neighbourhood, or is adjacent to a school site;                                                         | <i>The Site is located at the western periphery of an existing low density residential neighbourhood; the Proposed Development is consistent in scale and size to surrounding mid-rise and high-rise residential uses also located on the periphery of the low-density residential neighbourhood.</i> |
| (b) | The property abuts a designated Node or Corridor, and buffers other properties designated Low Density Residential from properties within the designated Node or Corridor; and | <i>As noted Schedule B – City Structure of the Official Plan, the intersection of Ira Needles Boulevard and Erb Street West is identified as a Minor Node and the area along Erb Street West identified as a Minor Corridor. The Site immediately abuts both these areas.</i>                         |
| (c) | The property has direct vehicular access onto an arterial or major collector road.                                                                                            | <i>Westhill Drive directly connects to Ira Needles Boulevard, which is identified as an Arterial Road.</i>                                                                                                                                                                                            |

In summary, the Proposed Development conforms with the Official Plan by delivering 140 residential units within the Built-up Area, contributing to the intensification targets and the City’s population growth objectives. The Proposed Development has a height of 25.76 metres (8 storeys) but has been designed to meet the majority of applicable performance standards while providing a height and density transition from adjacent low-rise residential uses to higher density residential uses along Ira Needles Boulevard. The Site is well connected to the surrounding transportation network, surface parking is appropriately screened from public view, and servicing infrastructure has sufficient capacity to accommodate the Proposed Development. Overall, the Proposed Development demonstrates a high standard of urban design and contributes to a compatible and efficient residential built form.

#### 5.4.1 City of Waterloo Official Plan Amendment No. 58 (2024)

The City of Waterloo initiated an Official Plan review (“OP Review”) process in 2020. The purpose of the OP Review was to meet the requirements of the Planning Act and do ensure the Official Plan remains in conformity with the current Provincial and Regional policies and plans, including confirmation of the existing municipal boundary, updated policies related to housing and building complete communities, identifying areas for

employment uses, facilitate intensification and development within Major Transit Station Areas and encouraging well-designed communities and developments.

OPA 58 was adopted by Council on December 2, 2024, and forwarded to the Ministry of Municipal Affairs and Housing for final approval. While not currently in force and effect, it is important to identify the key policy changes of OPA 58 that may influence the future development of the Site.

As part of OPA 58, the Site remains designated as Low Rise Residential on Schedule A – Land Use Schedule. Permitted uses in the Low Rise Residential designation includes single detached, semi-detached, duplex, triplex and townhouse dwellings as well as stacked townhouses and apartments in some circumstances.

The application for Official Plan Amendment proposes to redesignate the Site as Medium Rise Residential in the event that OPA 58 becomes in force and effect. Permitted uses in the Medium Rise Residential designation include multiple unit residential buildings. The proposed Official Plan designation of Medium Rise Residential is discussed below.

OPA 58 includes a number of modifications and revisions to the Official Plan related to the Medium Rise Residential designation, and other general policies which are important considerations for the future development of the Site.

Policy 3.4 (1) notes a maximum building height of four storeys for the Low Rise Residential designation and a maximum building height of six storeys for the Medium Rise Residential designation.

Policy 3.4 (6) outlines criteria to be considered when reviewing development applications proposing heights above the maximum heights contemplated in Section 3.4 (1). The following provides a summary of the considerations of Policy 3.4 (6) as well as commentary as to how each of the considerations has been addressed:

|     |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                   |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (a) | Lands are located within a designated Node, Corridor or Major Transit Station Area and satisfy all relevant policies of the City Form Chapter;                                                                                       | <i>The Site is located immediately adjacent to the Minor Node identified for the intersection of Ira Needles Boulevard and Erb Street West and adjacent to a Minor Corridor identified along Erb Street West.</i> |
| (b) | The proposed built form is deemed appropriate for the site and neighbourhood, has minimal impact on neighbouring land uses, and achieves an appropriate built form transition and buffer from lands designated Low Rise Residential; | <i>The Site is surrounded by existing mid-rise and high-rise residential uses along Westhill Drive and future high-rise residential uses being constructed on Erb Street West. The</i>                            |

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  | <p><i>Proposed Development provides for appropriate transition between surrounding medium-rise and high-rise residential uses to the north and west, and the existing low-rise residential uses to the east. The Proposed Development has been designed to situate the proposed eight-storey building (Building B) along Westhill Drive, maximizing its separation from the low rise residential uses.</i></p> <p><i>The Proposed Development has been strategically designed to situate the proposed eight-storey building closest to Westhill Drive, to maximize separation from adjacent low-rise residential development while delivering density required to make the project feasible. The combination of the proposed eight-storey building and six-storey building is fundamental to the financial viability of the Proposed Development in terms of future density and the transition between the two buildings is intentional.</i></p> <p><i>From a financial and technical perspective, the inclusion of the proposed eight-storey building is critical. Ontario Building Code (OBC) requirements become significantly more onerous once a building exceeds six storeys. At seven storeys, those high-rise standards are triggered, but without enough added density to justify the substantial increase in cost, making seven storeys financial infeasible; an eight-storey building provides the additional unit count needed to offset higher construction. The viability of the project depends on the combination of one six-storey building (Building A) and one eight-storey building (Building B).</i></p> <p><i>Phased construction is also a key consideration of the Proposed Development. The construction of one six-storey is critical to financing and absorption. The proposed project</i></p> |
|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <i>phasing mitigates risk, supports financing, and ensures the development can move forward successfully.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| (c) | <p>There is a demonstrated benefit to the surrounding community associated with granting the increase in building height beyond that of accommodating additional population in the context of Waterloo's population forecast and the supply / capacity of lands within existing designated Nodes, and Corridors, and Major Transit Station Areas;</p> <p>i. positive benefits noted in 3.4(6)(c) may include but are not limited to a broader mix of multi-bedroom units, enhanced active transportation connections, conservation of cultural heritage, enhanced sustainable design, increased parkland, and sustainable building features;</p> | <p><i>The Proposed Development includes a mix of unit types and typologies in terms of size and bedroom composition.</i></p> <p><i>In accordance with funding requirements of CMHC, a certain percentage of all units will have rents that are considered affordable and/or attainable to low to medium-income of families.</i></p> <p><i>The Proposed Development will provide for further transit ridership and includes appropriately designed connections to the surrounding active transportation network, including existing municipal pedestrian and cycling facilities.</i></p> |
| (d) | <p>There are limited adverse impacts to the surrounding area(s) in relation to sun, shadow, wind, significant views, transportation, compatibility, and emissions (including noise);</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p><i>A Traffic Impact Study, Noise Feasibility and Wind Study have been completed in support of the Proposed Development and noted no resulting adverse impacts.</i></p> <p><i>The Urban Design Brief prepared by GSP Group includes a sun and shadow study, and notes that the Proposed Development is considered compatible with the surrounding context and provides for appropriate sunlight access to neighbouring properties for most of the day throughout the year.</i></p> <p><i>Please refer to Section 6.0 of this Report for details of all technical studies.</i></p>     |
| e)  | <p>The site is well served by existing or planned transit;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <i>The Site is within walking distance to a range of transit services along Ira Needles Boulevard and Erb Street West.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| (f) | <p>The proposal does not require significant relief from standard regulations including landscaping, amenity space and other site specific requirements;</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <i>The Proposed Development conforms with most of the RMU-20 Zone development standards, with the exception of some very minor</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|     |                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                                                                                                                                                                                                                                                                                                                                               | <i>variances to regulations pertaining to open space and parking.</i>                                                                                                                                                                                                                                                                                                                                                                                                          |
| (g) | Surface parking is minimized in favour of more intensive forms of parking, including underground parking where feasible;                                                                                                                                                                                                                                      | <i>Given the mid-rise nature of the Proposed Development, surface and structure parking is the only financially viable option. However, the Proposed Development has been designed to provide for a combination of surface and structured parking that is screened from public view by Buildings A and B, and the provided parking has been reduced from the requirement outlined in the Zoning By-law due to the Site's adjacency to transit along Ira Needles Boulevard.</i> |
| (h) | Cultural heritage resources are conserved;                                                                                                                                                                                                                                                                                                                    | <i>The Site does not contain any cultural heritage resources, and the Proposed Development will not impact any cultural heritage resources which are adjacent to the Site.</i>                                                                                                                                                                                                                                                                                                 |
| (i) | The proposal demonstrates a high standard of urban design in accordance with the City's Urban Design standards and guidelines and any other relevant urban design policies set out in this Plan;                                                                                                                                                              | <i>As detailed in the Urban Design Brief prepared by GSP Group Inc., the Proposed Development has been designed to adhere to all urban design objectives and principals. Please refer to the Urban Design Brief as prepared by GSP Group for specific design details.</i>                                                                                                                                                                                                      |
| (j) | The proposal identifies and implements any required transportation improvements, with a particular focus on transportation demand management measures;                                                                                                                                                                                                        | <p><i>The Proposed Development includes a slightly reduced vehicular parking rate for the residential units, given its proximity to existing transit service and other multi-modal transportation networks.</i></p> <p><i>As noted in the Traffic Impact Study, the Proposed Development should consider a number of transportation demand strategies as part of future detailed design.</i></p>                                                                               |
| (k) | Medium to high rise residential uses are located with direct vehicular access to arterial or collector roads to the extent possible. Where such access is deemed by the City to be undesirable or not feasible, vehicular access may be provided by local streets if traffic is directed to the nearest arterial or collector road via a route that minimizes | <i>Westhill Drive directly connects to Ira Needles Boulevard, which is identified as an Arterial Road. The Proposed Development includes direct connections to Westhill Drive; it does not include any connections through the existing low rise</i>                                                                                                                                                                                                                           |

|     |                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | vehicular travel within the low density rise residential neighbourhood;                                                                                                                                                                                                                                                                    | <i>residential neighbourhood to the east.</i>                                                                                                                                                                                                                                                  |
| (l) | Infrastructure capacity is not exceeded;                                                                                                                                                                                                                                                                                                   | <i>All municipal servicing has sufficient capacity to accommodate the Proposed Development.</i>                                                                                                                                                                                                |
| (m) | Community services, infrastructure and transportation impact issues are adequately addressed, as applicable. A Transportation Impact Study, Servicing Report, and any other relevant supporting information may also be required. All relevant supporting information may require, at the City's request, examination of off-site impacts; | <i>A Transportation Impact Study and Preliminary Servicing Report have been prepared in support of the Proposed Development.</i>                                                                                                                                                               |
| (n) | If applicable, safe access, flood protection and geotechnical stability is achieved to the satisfaction of the City and the Grand River Conservation Authority, and any other authority having jurisdiction;                                                                                                                               | <i>Not applicable</i>                                                                                                                                                                                                                                                                          |
| (o) | Emergency response is determined feasible, and emergency access is provided, to the satisfaction of the City;                                                                                                                                                                                                                              | <i>The Proposed Development has been designed to comply with all emergency access and fire prevent standards.<br/><br/>As noted, the Proposed Development has direct access to Westhill Drive, which is an existing municipal road and meets all applicable emergency access requirements.</i> |
| (p) | The proposal satisfies all other applicable policies, including the policies of this Official Plan.                                                                                                                                                                                                                                        | <i>As discussed in this section of the Report, all other applicable policies of the Official Plan are satisfied.</i>                                                                                                                                                                           |

While not currently in effect, the Proposed Development conforms with the intent of OPA No. 58 by introducing medium rise residential buildings on the periphery of an existing low rise residential community, while achieving a density of 277 bedrooms per hectare and respecting applicable performance standards. The Proposed Development is context-sensitive, providing an appropriate transition between adjacent low-rise residential dwellings to the east and the 11-storey apartment building to the northwest along Ira Needles Boulevard.

## 5.5 City of Waterloo Zoning By-law

The City of Waterloo Zoning By-law 2018-050 ("Zoning By-law") was passed by Council on September 10, 2018, and is a by-law used to regulate and restrict: the use of land; the frontage, depth, and area of parcels of land; the use, location, erection, height, density,

bulk, size, floor area, spacing and character of buildings and structures; the elevation of doors, windows and other openings of buildings and structures; the elevation of doors, windows and other openings of buildings and structures; the provision of maintenance of off-street loading and parking facilities; and, all other matters authorized by the Planning Act, R.S.O 1990, c. P.13 as amended and the regulations related thereto.

The Site is currently zoned 'Future Determination (FD)' in the Zoning By-law (**Figure 7**). The Future Determination (FD) Zone is used as a placeholder zoning designation whereby the appropriate zoning has not yet been determined by the City.

The Subject Application seeks to rezone the Site from 'Future Determination (FD)' to 'Residential Mixed-Use (RMU-20)' with site-specific provisions. Multi-unit residential buildings (including apartment buildings) are permitted within the Residential Mixed Use (RMU-20) Zone. The following is a summary of applicable zoning regulations from the Residential Mixed-use (RMU-20) Zone, as well as general regulations associated with the Proposed Development:

**Table 1 - Residential Mixed-Use (RMU-20) Zone Regulations**

| Regulation                                 | Required                                                                                                                                                                                                        | Proposed                                                                                                                    | Conforms (Y/N)              |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Min. Lot Frontage                          | 20.0-metres                                                                                                                                                                                                     | 103.98 metres                                                                                                               | ✓                           |
| Min. Street Line Setback                   | 5.0-metres                                                                                                                                                                                                      | 6.42 metres (lowest)                                                                                                        | ✓                           |
| Max. Street Line Setback                   | At least 75% of the street line front building façade shall be within 7.5 metres of the street line                                                                                                             | Achieved                                                                                                                    | ✓                           |
| Min. Side Yard Setback                     | 3.0-metres                                                                                                                                                                                                      | 4.10 metres                                                                                                                 | ✓                           |
| Min. Rear Yard Setback                     | 7.5-metres                                                                                                                                                                                                      | 7.51 metres                                                                                                                 | ✓                           |
| Min. Low Rise Residential Lot Line Setback | 7.5 metres or half the height of the building, whichever is greater, except for townhouse buildings and freehold townhouse buildings, where no low-rise residential lot line setbacks shall apply (9.95-metres) | 7.51 metres (to the uses to the east fronting Westpark Crescent and Westhaven Street)<br>4.13 metres (to 48 Westhill Drive) | X<br>(see commentary below) |

|                                       |                                                                                                                                                                    |                                                                                                                                                                                                         |                             |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Min. Building Height                  | 7.5-metres                                                                                                                                                         | 25.76 metres (8 storeys)                                                                                                                                                                                | ✓                           |
| Max. Building Height                  | 30 metres and 9-storeys                                                                                                                                            | 25.76 metres (8 storeys)                                                                                                                                                                                | ✓                           |
| Min. Density                          | (none)                                                                                                                                                             | 277 bedrooms per hectare                                                                                                                                                                                | ✓                           |
| Max. Density                          | 525 bedrooms per hectare                                                                                                                                           | 277 bedrooms per hectare                                                                                                                                                                                | ✓                           |
| Min. Landscaped Open Space            | 30.0%                                                                                                                                                              | 20.05%                                                                                                                                                                                                  | X<br>(see commentary below) |
| Max. Number of Main Buildings per Lot | More than one (1) permitted                                                                                                                                        | 2                                                                                                                                                                                                       | ✓                           |
| Min. Height of First Storey           | 4.0-metres                                                                                                                                                         | 4.0 metres                                                                                                                                                                                              | ✓                           |
| Min. Amenity Area                     | 3 square metres for the first bedroom and 2 square metres for each additional bedroom in the dwelling unit<br>(516.0-square metres)                                | 1,715.70 square metres                                                                                                                                                                                  | ✓                           |
| Min. Parking Rate                     | 1.25 spaces per dwelling unit (1.15 for residential dwelling unit, 0.10 for visitor parking)<br>(161 parking spaces for residents, 14 parking spaces for visitors) | 128 parking spaces for residents (parking rate of 0.91 spaces per unit)<br><br>12 visitor parking spaces (parking rate of 0.09 spaces per unit)<br><br>Total proposed parking rate: 1.0 spaces per unit | X<br>(see commentary below) |

The Proposed Development has been designed to satisfy most of the regulatory requirements of the Residential Mixed-Use (RMU-20) Zone. The following provides planning commentary and justification for the site-specific exceptions associated with the Proposed Development that do not meet the requirements identified in **Table 1** of this Report above:

#### 5.5.1 Minimum Low Rise Residential Lot Line Setback

The Residential Mixed-Use (RMU-20) Zone requires a Minimum Low Rise Residential Lot Line Setback of 7.50 metres or half the height of the building, whichever is greater (9.95 metres in this circumstance). The intent of the Zoning By-law is to provide adequate separation between taller, dense buildings and low-density residential uses.

The Proposed Development provides for a 7.5 metres setback along the east property line, adjacent to the existing low rise residential uses fronting Westhaven Street and Westpark Crescent. The adjacent low rise residential uses feature deep lots with generous rear yard setbacks. The low-rise residential setback of 7.5 metres associated with the Proposed Development along with the generous rear yard setbacks of some of the adjacent low rise residential uses results in a large separation between the two uses.

The Proposed Development includes a minimum 4.13metre setback between Building B and the adjacent single-detached dwelling located to the south of the Site at 48 Westhill Drive. The property at 48 Westhill Drive features a dense row of coniferous trees along the property line bordering the Site, providing enhanced screening from the Proposed Development. The Proposed Development also features a dense row of planting around the Site's perimeter, which provides further visual buffering between the Site and adjacent low-density residential uses to the south (48 Westhill Drive) as well as to the east (uses fronting Westpark Crescent and Westhaven Street).

#### 5.5.2 Minimum Landscaped Open Space

The Residential Mixed-Use (RMU-20) Zone requires a Minimum Landscaped Open Area of 30%, whereas 20.23% is provided as part of the Proposed Development. While the Minimum Landscaped Open Space requirement has been reduced to 20.23%, the Proposed Development exceeds the minimum amenity area requirements, proposing 1,715.70 square metres whereas 516.0 square metres is required. This enhanced amenity area will be provided through private patios and balconies, common ground level and rooftop amenity areas and common indoor amenity spaces. Future residents will have ample high-quality indoor and outdoor space for recreation and amenity use. The amenity areas have been designed to be functional, accessible, and visually appealing, as well as promote site safety through natural surveillance and "eyes on the street."

The Proposed Development includes a large street setback along Westhill Drive. The buildings have been situated on site to provide ample opportunity to enhanced landscaping along the Site's frontage as well as sufficient space for street tree plantings.

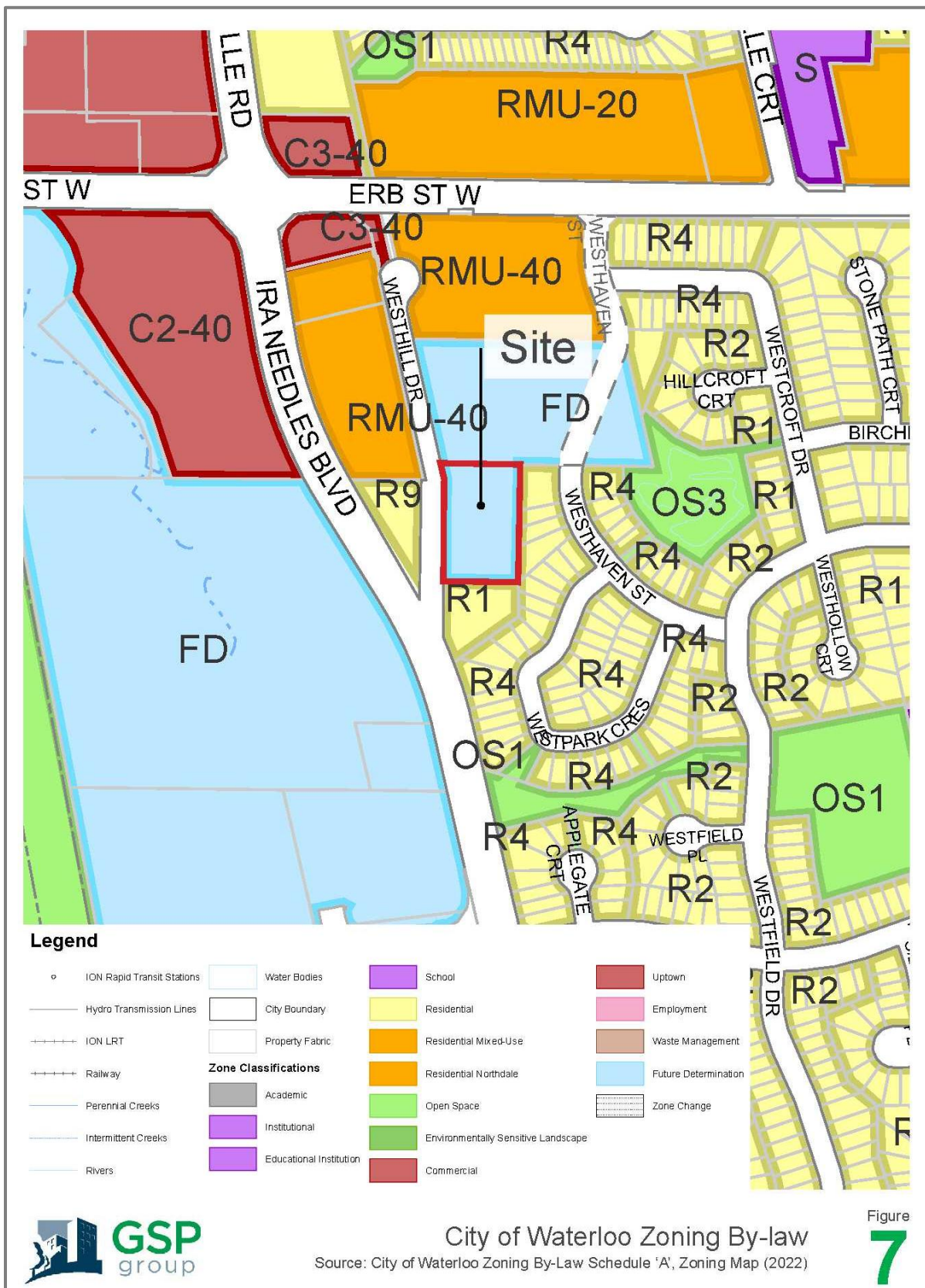
#### 5.5.3 Minimum Parking Requirement

The Zoning By-law requires a minimum parking rate of 1.15 spaces per unit for residential units (161 spaces) and 0.1 spaces per unit for visitor parking (14 spaces). The Proposed Development proposes a residential parking rate of 0.91 spaces per unit (128 spaces) and a visitor parking rate of 0.09 spaces per unit (12 spaces). In total, the Proposed Development is short approximately 35 parking spaces.

The Proposed Development is located within walking distance to numerous commercial, retail, institutional, and employment opportunities along Ira Needles Boulevard and Erb Street West. Additionally, the Site is located within walking distance to a number of transit routes along Ira Needles Boulevard and Erb Street West and the GRT terminal located at The Boardwalk, which provides transit connections to the GRT's broader network. Finally, the Proposed Development has been designed to provide direct and easy access to surrounding active transportation networks, including pedestrian and cycling facilities.

The proposed parking reduction has been discussed in further detail as part of the Transportation Impact Study.

The details of the proposed Zoning By-law Amendment are contained in Section 6.2 of this Report.



## 6. Proposed Applications

### 6.1 Official Plan Amendment

The purpose of the Official Plan Amendment is to redesignate the Site from “Low Density Residential” to “Mixed-Use Medium Density Residential” with the following Specific Provision Area:

#### 11.1. XX      36 Westhill Drive (Special Provision Area XX)

1. The policies of this Specific Provision Area apply to the lands at 36 Westhill Drive, show as SPA XX on Schedule ‘A6’ – Specific Provision Areas.
2. Notwithstanding the other policies in the Official, the maximum building height shall not exceed eight-storeys for Building B.

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

### 6.2 Zoning By-law Amendment

The purpose of the Zoning By-law Amendment is to rezone the Site from “Future Development (FD)” to “Residential Mixed-Use (RMU-20)” with the following Site-Specific Exceptions:

| Exception | Address           | Zoning | File Reference  |
|-----------|-------------------|--------|-----------------|
| C---      | 36 Westhill Drive | RMU-20 | By-law 2025-XXX |

Location: 36 Westhill Drive as shown on Schedule “C1” to this BY-LAW

Site Specific Regulations:

- a) Notwithstanding anything to the contrary, the following regulations shall apply to the lands known municipally as 36 Westhill Drive:

| Regulations                                     |                                   |
|-------------------------------------------------|-----------------------------------|
| LANDSCAPED OPEN SPACE (minimum)                 | 20.23%                            |
| LOW RISE RESIDENTIAL LOT LINE SETBACK (minimum) | 4.31-metres (south property line) |

|                          |     |
|--------------------------|-----|
| PARKING SPACES (minimum) | 140 |
|--------------------------|-----|

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 City.

## 7. Public Consultation

Upon acceptance and circulation of the application package in support of the Proposed Development, the City requires the posting of Notice of Application sign(s) to inform surrounding property owners of the Proposed Development. GSP Group Inc. and BlackDoor (Westhill) Inc. commit to posting the required signage promptly with a clear, unobstructed view from the street and agree to maintain the sign throughout the duration of processing of the applications by the City.

GSP Group Inc. and BlackDoor (Westhill) Inc. are agreeable to the scheduling of a Neighbourhood Information Meeting or open house, if deemed required by the City, as well as any additional informal public meeting(s), open house meeting(s) and/or neighbourhood meetings that may be required.

The proposed Official Plan and Zoning By-law Amendment requires a Statutory Public Meeting in accordance with the Planning Act. GSP Group Inc. and BlackDoor (Westhill) Inc. will attend the public meeting as scheduled by the City and give a formal presentation regarding the Proposed Development and associated applications, as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow-up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation process to the City for their review and consideration prior to the preparation of a final staff report and recommendation on the proposed Official Plan and Zoning By-law Amendment.

## 8. Conclusion

GSP Group has been retained by BlackDoor (Westhill) Inc. to provide planning justification in support of the Proposed Development of the property at 36 Westhill Drive which includes the development of a six- storey and eight-storey two (2) future mid-rise multi-unit residential buildings.

The purpose of the proposed Official Plan Amendment to redesignate the Site from “Low Density Residential” to “Mixed-Use Medium Density Residential” with Specific Provision Area pertaining to maximum building height.

The purpose of the proposed Zoning By-law Amendment is to rezone the Site from “Future Determination (FD)” to “Residential Mixed-Use (RMU-20)” with site specific provisions pertaining to building height, density and parking.

This Planning Justification Report has undertaken a policy review and concludes that the proposed Official Plan and Zoning By-law Amendments are appropriate and represent good planning for the following reasons:

- The Proposed Development is consistent with the PPS as it will result in efficient, compact, and transit-supportive intensification within the City of Waterloo Built-up Area, making efficient use of existing infrastructure while contributing to the achievement of complete communities.
- The Proposed Development conforms to the ROP by exceeding minimum density targets, supporting active transportation and transit access, and delivering a diverse mix of housing options that contribute to the Region’s growth and intensification goals.
- The Proposed Development conforms with the Official Plan by providing 140 new mid-rise residential units in a form and scale that respects surrounding land uses, maintains appropriate transitions, and contributes to the City’s Built-up Area intensification targets.
- The Proposed Development conforms with the intent of Official Plan Amendment No. 58, delivering a context-sensitive design that transitions appropriately between lower-density and higher-density built forms and contributes to long-term population and housing targets.

- Site-specific zoning exceptions, including for landscaped open space, low-rise residential lot line setback, and minimum parking spaces maintain the intent of the Zoning By-law by delivering a high-quality built form, exceeding amenity area requirements, and ensuring compatibility with adjacent development.

In summary, the Proposed Development will result in a suitable and context-sensitive form of intensification which is appropriate and feasible at this location, will benefit the community and represents good planning.

Prepared by:

GSP Group Inc.



Dylan Schnurr  
Student Planner



Kristen Barisdale, MCIP, RPP  
Vice President, Planning

# **APPENDIX A:**

## **Detailed Design Package**

Zoning By-Law Amendment Application

PROPOSED RESIDENTIAL DEVELOPMENT

36 Westhill Drive

Waterloo, Ontario



DRAWING LIST

|                     |                             |        |
|---------------------|-----------------------------|--------|
| <b>A 100 SERIES</b> |                             |        |
| A101                | CONTEXT PLAN AND STATISTICS | 1:1000 |
| A102                | SITE PLAN                   | 1:150  |
| <b>A 300 SERIES</b> |                             |        |
| A300                | LOWER PARKING PLAN          | 1:150  |
| A301                | GROUND FLOOR PLAN           | 1:150  |
| A302                | TYPICAL FLOOR PLAN          | 1:150  |
| <b>A 400 SERIES</b> |                             |        |
| A401                | ELEVATIONS                  | 1:150  |
| A402                | ELEVATIONS                  | 1:150  |
| A403                | ELEVATIONS                  | 1:150  |
| A404                | RENDERINGS                  | nts    |
| <b>A 500 SERIES</b> |                             |        |
| A501                | SITE SECTIONS               | 1:150  |
| <b>A 600 SERIES</b> |                             |        |
| A601                | SHADOW STUDIES              | NTS    |
| A602                | SHADOW STUDIES              | NTS    |
| A603                | SHADOW STUDIES              | NTS    |

CLIENT:

BLACKDOOR (WESTHILL) INC.

75 SHEFFIELD STREET  
NORTH YORK, ON M6M 3E9

ARCHITECT :

ARCHITECTURE UNFOLDED

368 DUFFERIN STREET  
TORONTO, ON M6K 1Z8

TEL: 416.601.5416

PLANNER:

GSP GROUP

72 VICTORIA STREET SOUTH  
SUITE 201  
KITCHENER, ON N2G 4Y9

TEL: 519.569.8883

MECHANICAL ENGINEERS:

QUASAR CONSULTING GROUP

250 ROWNTREE DAIRY ROAD  
WOODBIDGE, ON L4L 9J7

TEL: 905.507.0800

ELECTRICAL ENGINEERS:

QUASAR CONSULTING GROUP

250 ROWNTREE DAIRY ROAD  
WOODBIDGE, ON L4L 9J7

TEL: 905.507.0800

SITE SERVICE:

MERITECH ENGINEERING

1315 BISHOP STREET NORTH  
SUITE 202  
CAMBRIDGE, ON N1R 6Z2

TEL: 519.623.1140

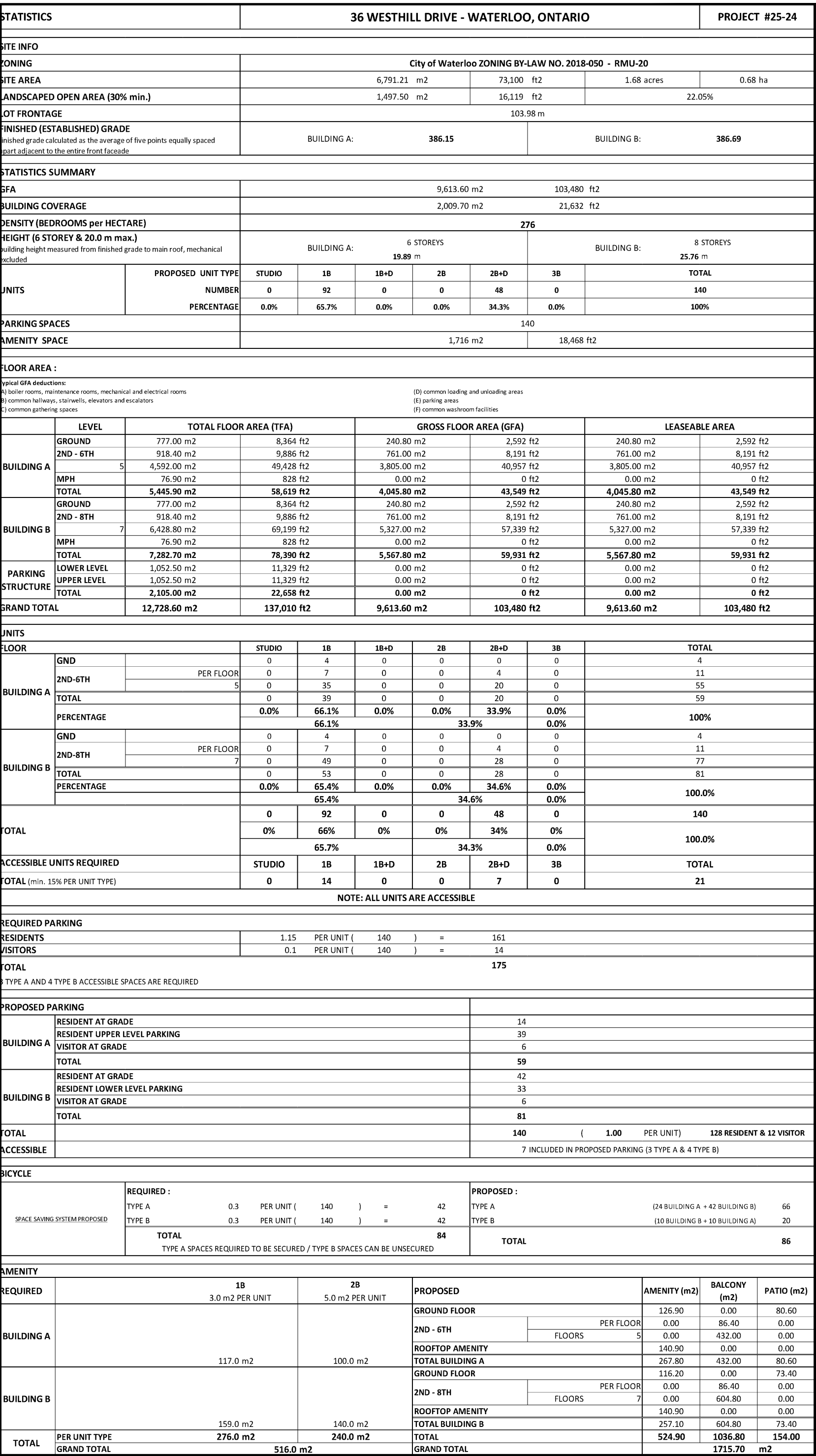
GEOTECHNICAL :

CVD ENGINEERING LTD.

311 VICTORIA STREET NORTH  
KITCHENER, ON N2H 5E1

TEL: 519.742.8979

LANDSCAPE ARCHITECT:



|                                                                                                                                                                                        |                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p align="center"><u>SURVEY INFORMATION</u></p>                                                                                                                                        | <p>PLAN OF SURVEY ILLUSTRATING TOPOGRAPHY OF<br/>PART OF LOTS 40 AND 41<br/>GERMAN COMPANY TRACT<br/>(GEOGRAPHIC TOWNSHIP OF WATERLOO)<br/>CITY OF WATERLOO<br/>REGIONAL MUNICIPALITY OF WATERLOO</p> |
| <p>J.D. BARNES LIMITED<br/>4273 KING STREET EAST, #100<br/>KITCHENER, ONTARIO N2P 2E9<br/>PHONE: 519.578.2220<br/>FAX: 519.650.6625<br/>WWW.JDBARNES.COM<br/>FILE No. 24-40-522-00</p> |                                                                                                                                                                                                       |

notes:

|            |                            |          |
|------------|----------------------------|----------|
| 2          | issued for ZBA application | 08.07.25 |
| 1          | issued for coordination    | 07.30.25 |
| revisions: |                            | mm.dd.yy |

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuella ofori



planning:

structural:

electrical:

mechanical:

landscape:

site services:

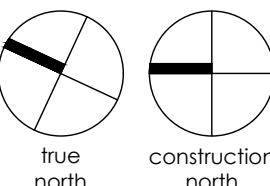
owner:

**blackdoor development company inc.**

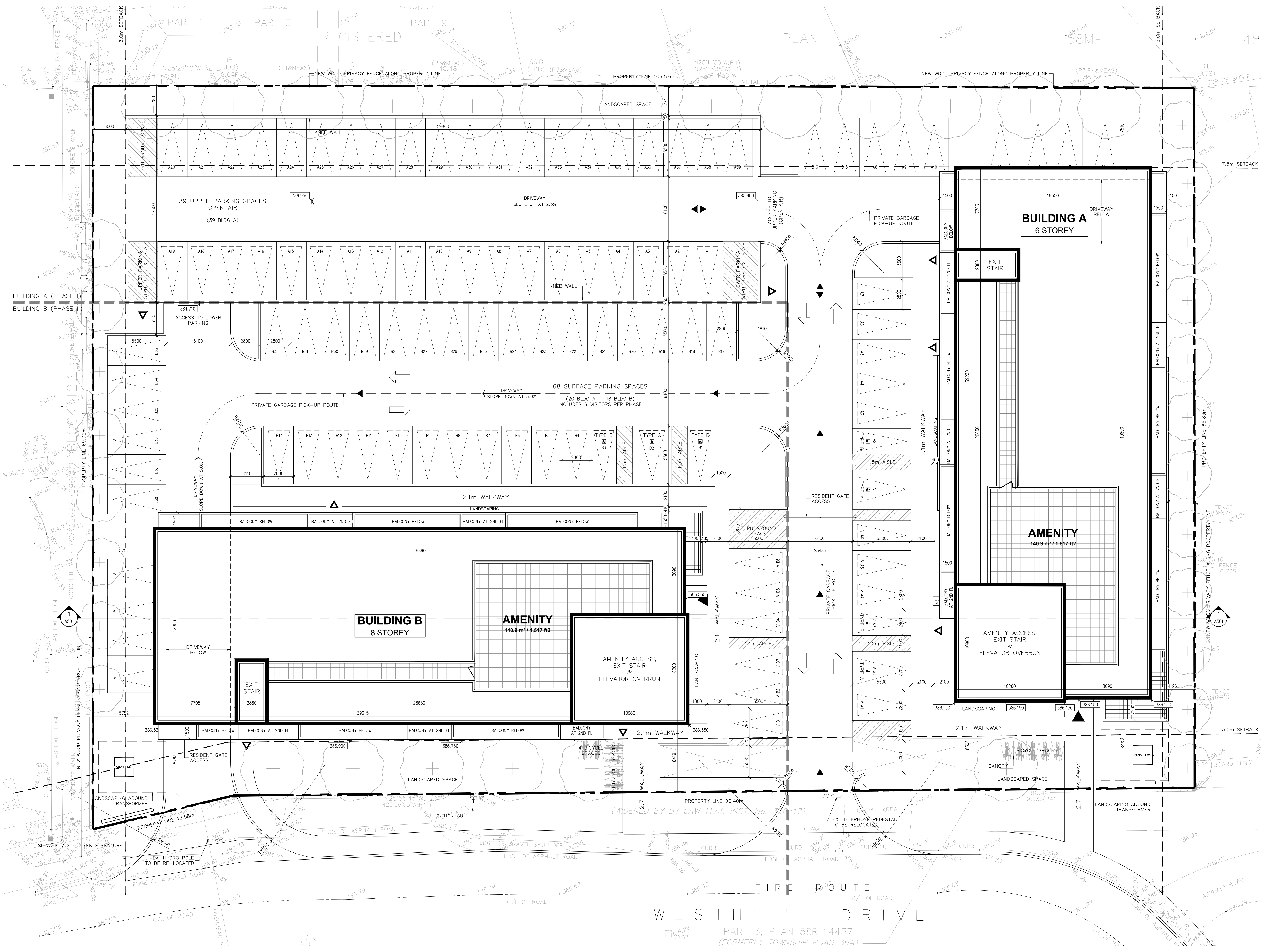
project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

## context plan & statistics

august.07.2025  
1:1000  
25-24  
eo / bd



# A101



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notes:

**SITE LEGEND**

|                       |                          |
|-----------------------|--------------------------|
| ▲ BUILDING ENTRANCE   | □ CATCH BASIN            |
| ▼ BUILDING EXIT       | ⊗ MAINTENANCE HOLE COVER |
| ♿ HANDICAPPED PARKING | ⊕ FIRE HYDRANT           |
| PROPOSED ELEVATION    | ⊙ SITE LIGHTING          |
| EXISTING ELEVATION    | ⊖ HYDRO POLE             |

**PARKING LEGEND**

PARKING SPACE

ACCESSIBLE SPACES

VERTICAL BIKE (STAGGERED INSTALL)

HORIZONTAL STACK BICYCLE SPACE

2 issued for ZBA application 08.07.25  
1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :  
eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuel ofori

planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner: blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

site plan

august.07.2025  
1:150  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:  
drawing number:

TRUE NORTH  
CONSTRUCTION NORTH

A102

notes:

| SITE LEGEND                                                                         |                     |                                                                                     |                        |
|-------------------------------------------------------------------------------------|---------------------|-------------------------------------------------------------------------------------|------------------------|
|  | BUILDING ENTRANCE   |  | CATCH BASIN            |
|  | BUILDING EXIT       |  | MAINTENANCE HOLE COVER |
|  | HANDICAPPED PARKING |  | FIRE HYDRANT           |
|  | PROPOSED ELEVATION  |  | SITE LIGHTING          |
|  | EXISTING ELEVATION  |  | HYDRO POLE             |

### PARKING LEGEND

**PARKING SPACE**

2800

**ACCESSIBLE SPACES**

3700 1500 2400

5500

TYPE A

TYPE B

**VERTICAL BIKE (STAGGERED INSTALL)**

460

1250

2400

**HORIZONTAL STACK BIKE**

1780 1750

460

1250

2400

aisle

2 issued for ZBA application 08.07.25  
1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuella ofori



planning:

structural

electrica

mechanical:

landscape

site services:

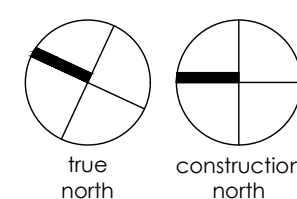
owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

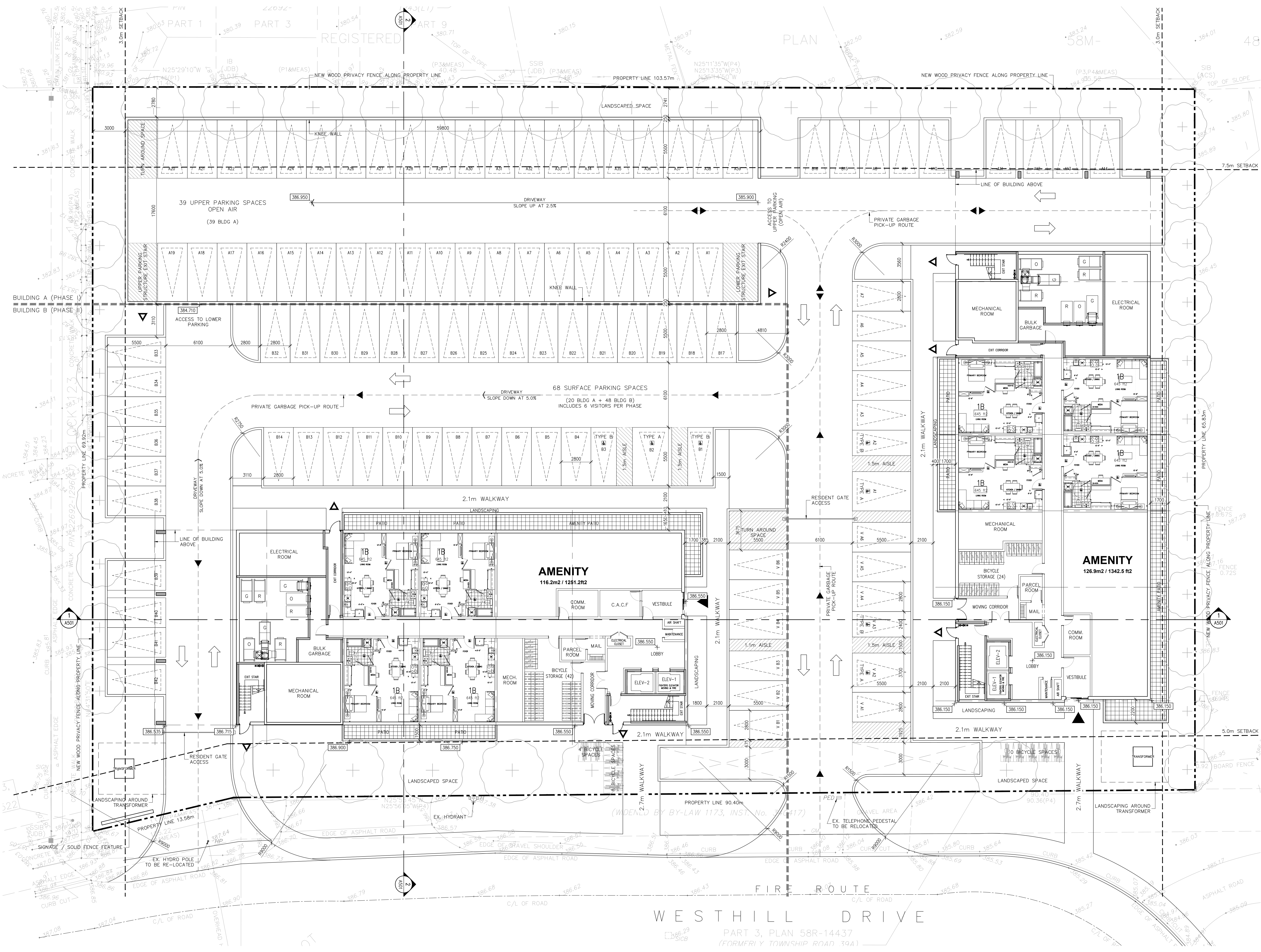
lower parking plan

august.07.2025  
1:150  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:  
number:



# A300



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notes:

| SITE LEGEND |                     |  |                        |
|-------------|---------------------|--|------------------------|
|             | BUILDING ENTRANCE   |  | CATCH BASIN            |
|             | BUILDING EXIT       |  | MAINTENANCE HOLE COVER |
|             | HANDICAPPED PARKING |  | FIRE HYDRANT           |
|             | PROPOSED ELEVATION  |  | SITE LIGHTING          |
|             | EXISTING ELEVATION  |  | HYDRO POLE             |

| PARKING LEGEND |      |  |      |
|----------------|------|--|------|
|                | 2800 |  | 1500 |
|                | 2400 |  | 2400 |
|                | 5000 |  | 1750 |
|                | 1750 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
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|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |
|                | 1200 |  | 1200 |

2 issued for ZBA application 08.07.25  
1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuela ofori

planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner: blackdoor development company inc.

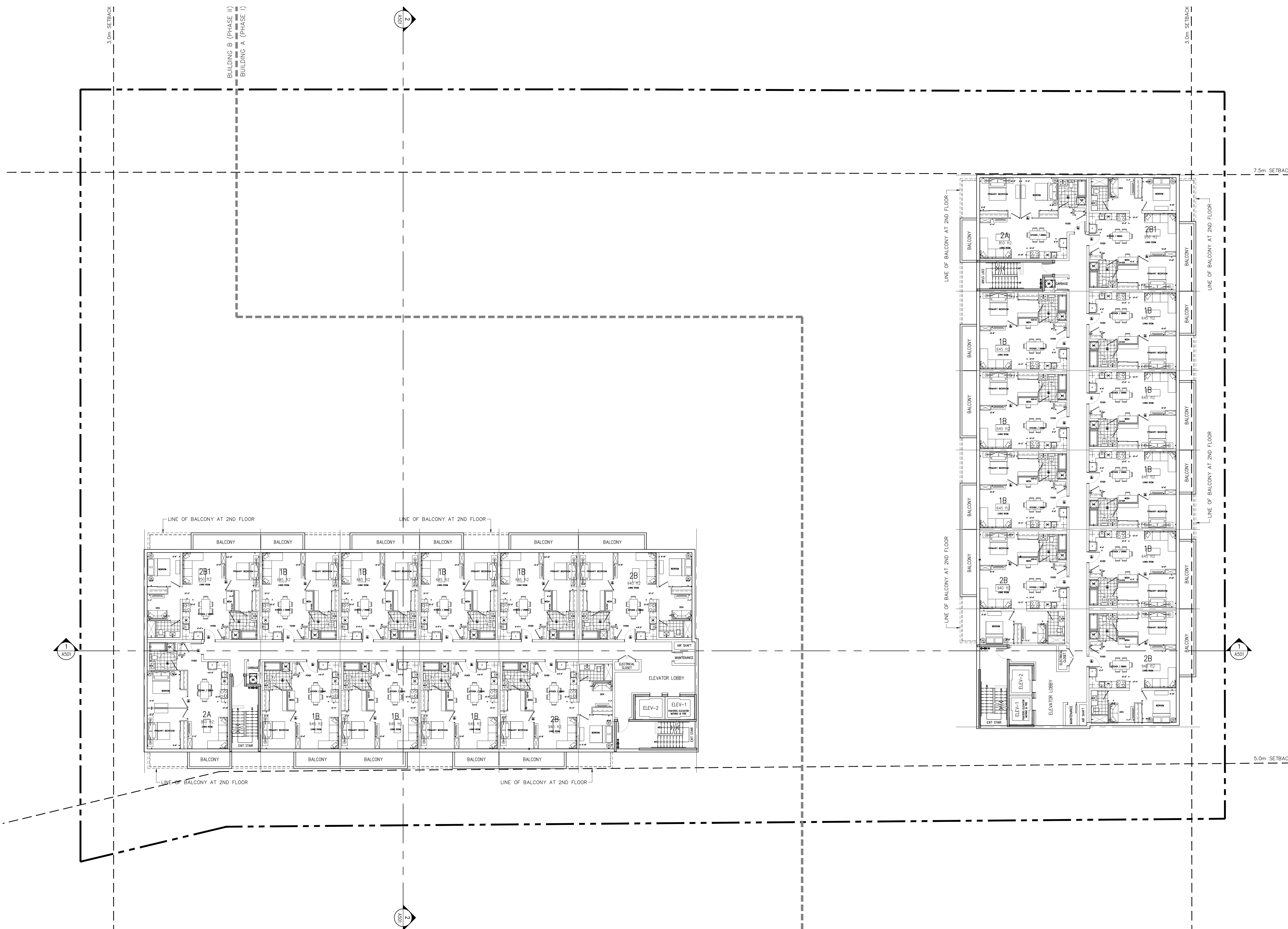
project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

ground floor plan

august.07.2025  
1:150  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:  
drawing number:

A301



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notes:

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1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuela ofori

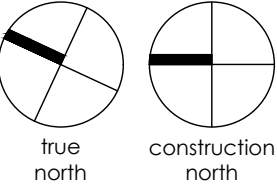


planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

typical floor plan

august.07.2025 date:  
1:150 scale:  
25-24 project:  
eo / bd drawn by:



drawing number:  
A302



BUILDING A  
east elevation



BUILDING B  
east elevation



BUILDING B  
west elevation



BUILDING A  
west elevation

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1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuela ofori

planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

elevations

august.07.2025  
1:150  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:

drawing number:

A401

# architectureunfolds

info@unfolded.ca

tel: (416) 601.5416

o. on. m6k1z8

erin street, toro

368 d

08.07.25

07.30.25

mm.dd.yy



EDUARDO A. ORTIZ  
LICENCE  
6919

planning.

structural

electrica

mechani

landscap

site service

owner:

project:

Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

drawing number:

date:

scale:

project:

awn by:

drawing number:

# A402



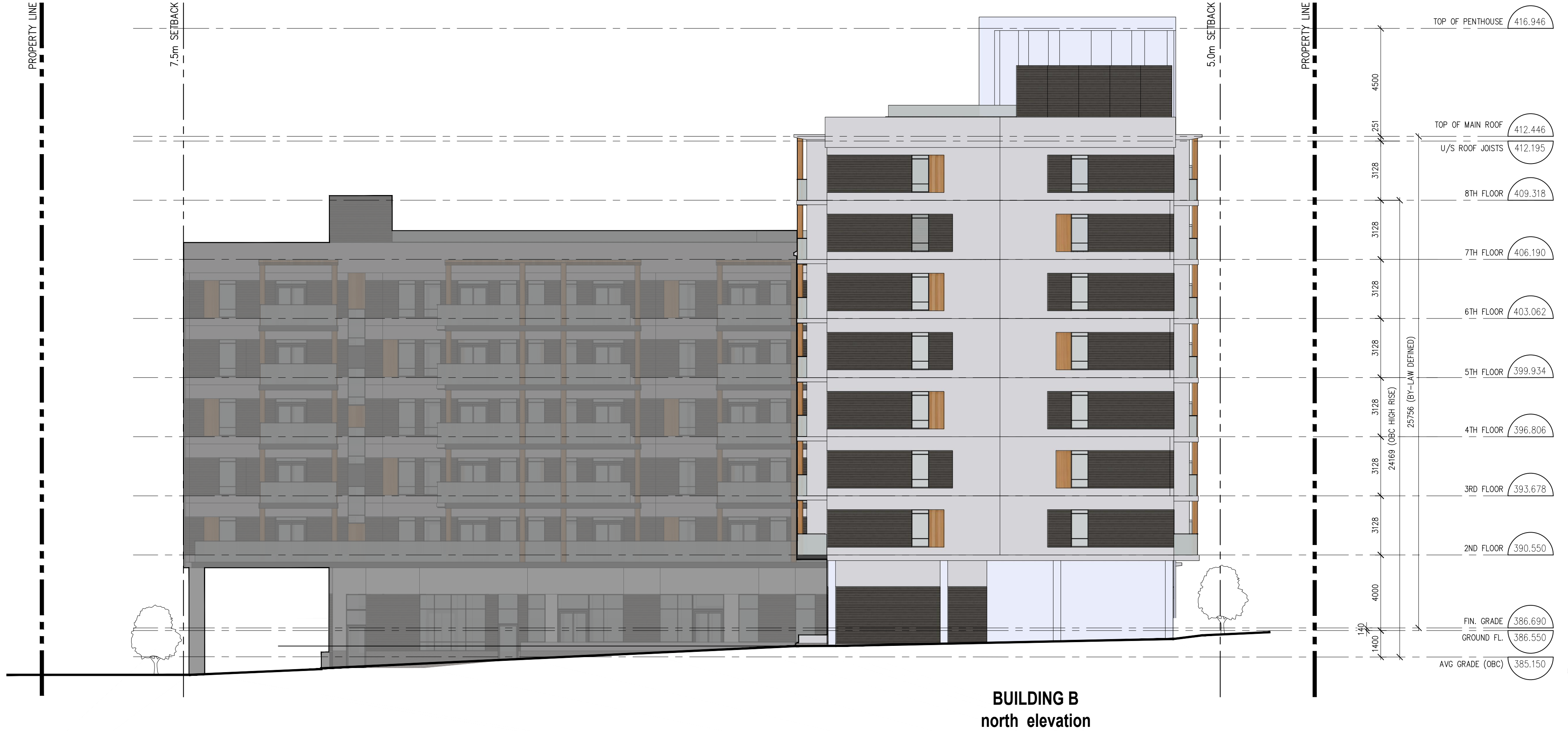
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scale:

project:

awn by:

drawing number:



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1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuella ofori



planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner:  
Blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

elevations

august.07.2025  
1:150  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:

drawing number:

A403





birds eye site view



westhill drive (west) elevation

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revisions: mm.dd.yy

architectural team :

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bonnie douthwright  
olena kobets-sikh  
emmanuella ofori



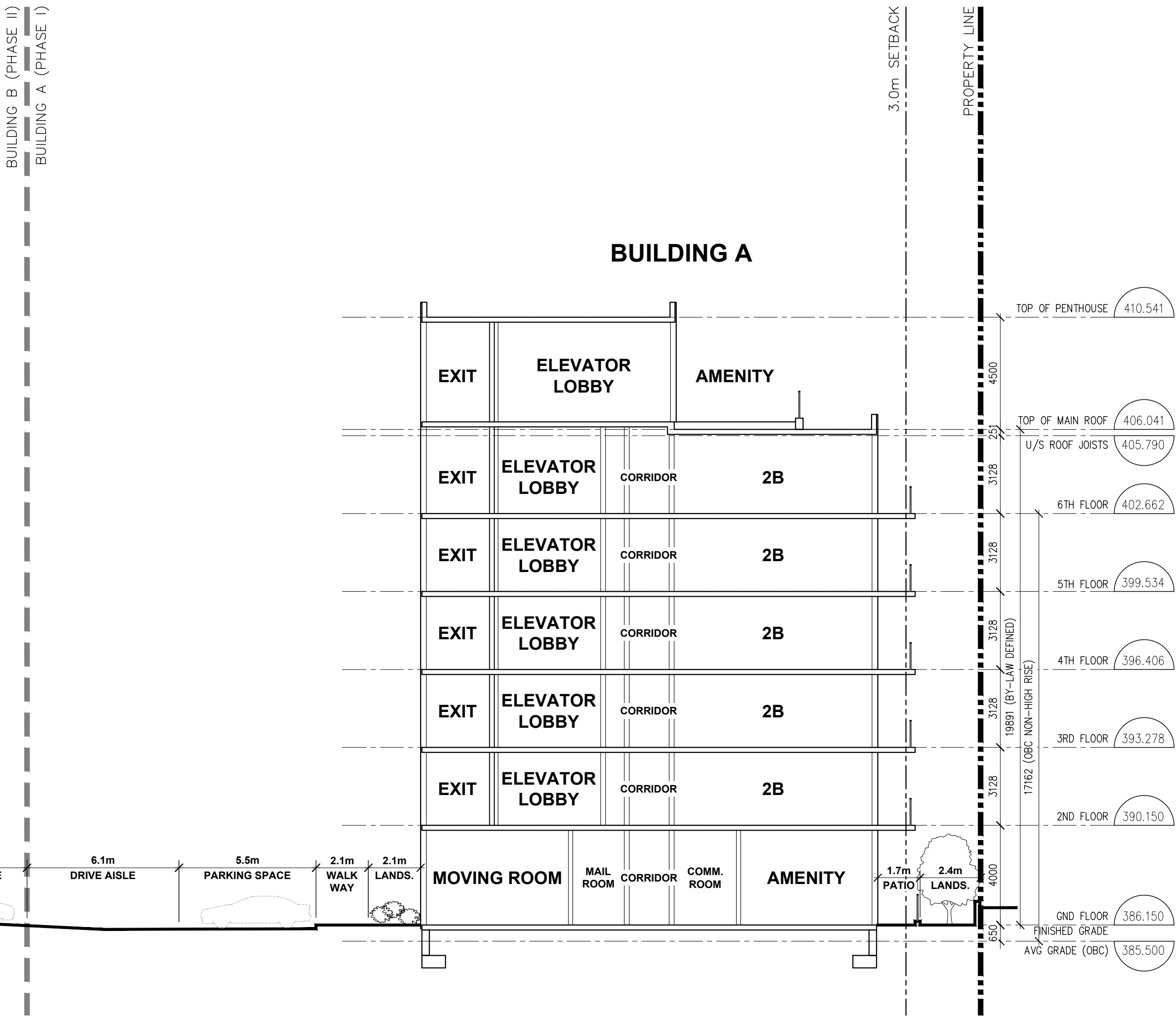
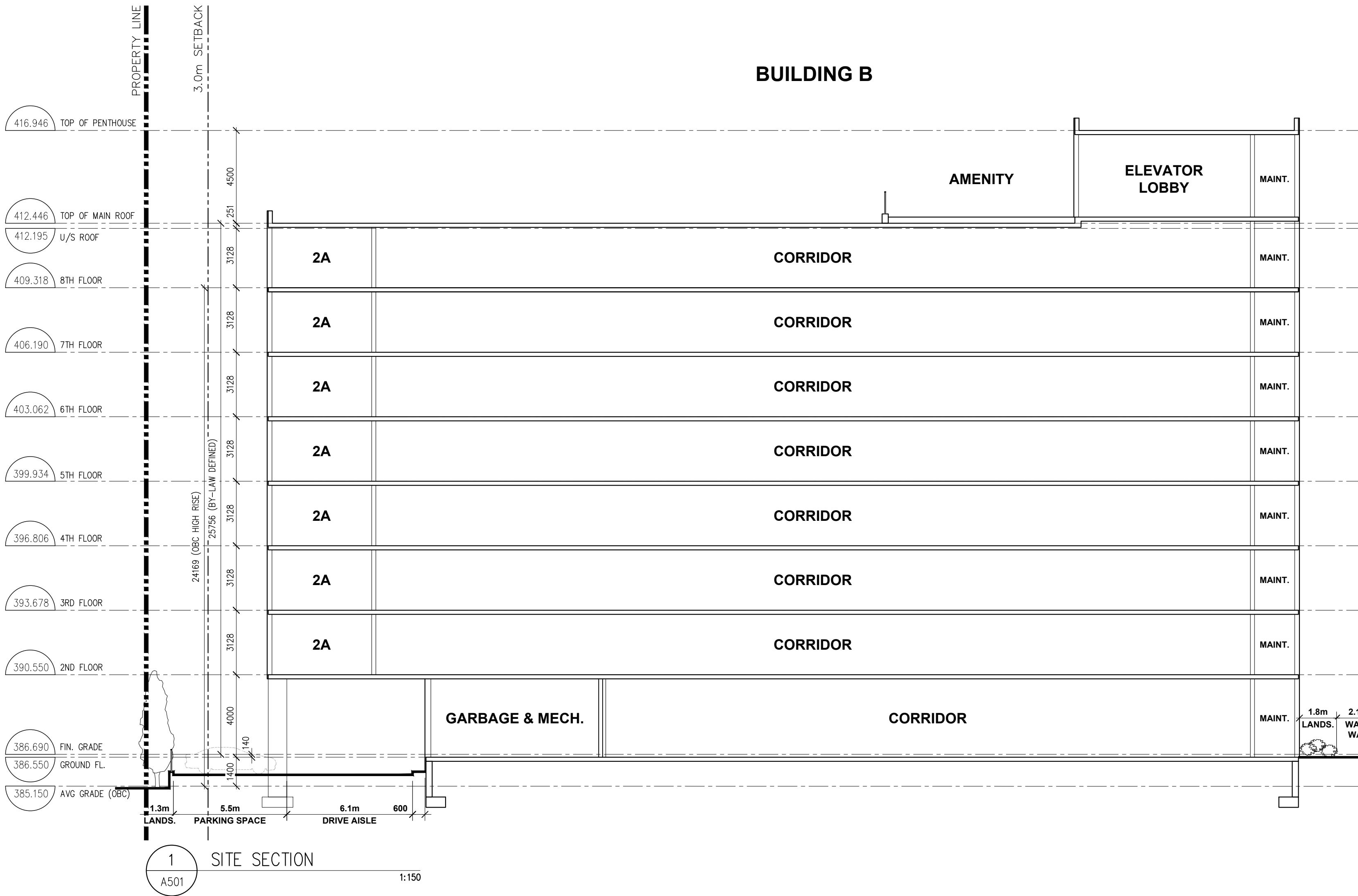
planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

rendering views

date: august.07.2025  
nts  
scale: 25-24  
project: eo / bd  
drawn by:  
drawing number:

A404



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revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sigkh  
emmanuela ofori



planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:  
owner:  
Blackdoor development company inc.

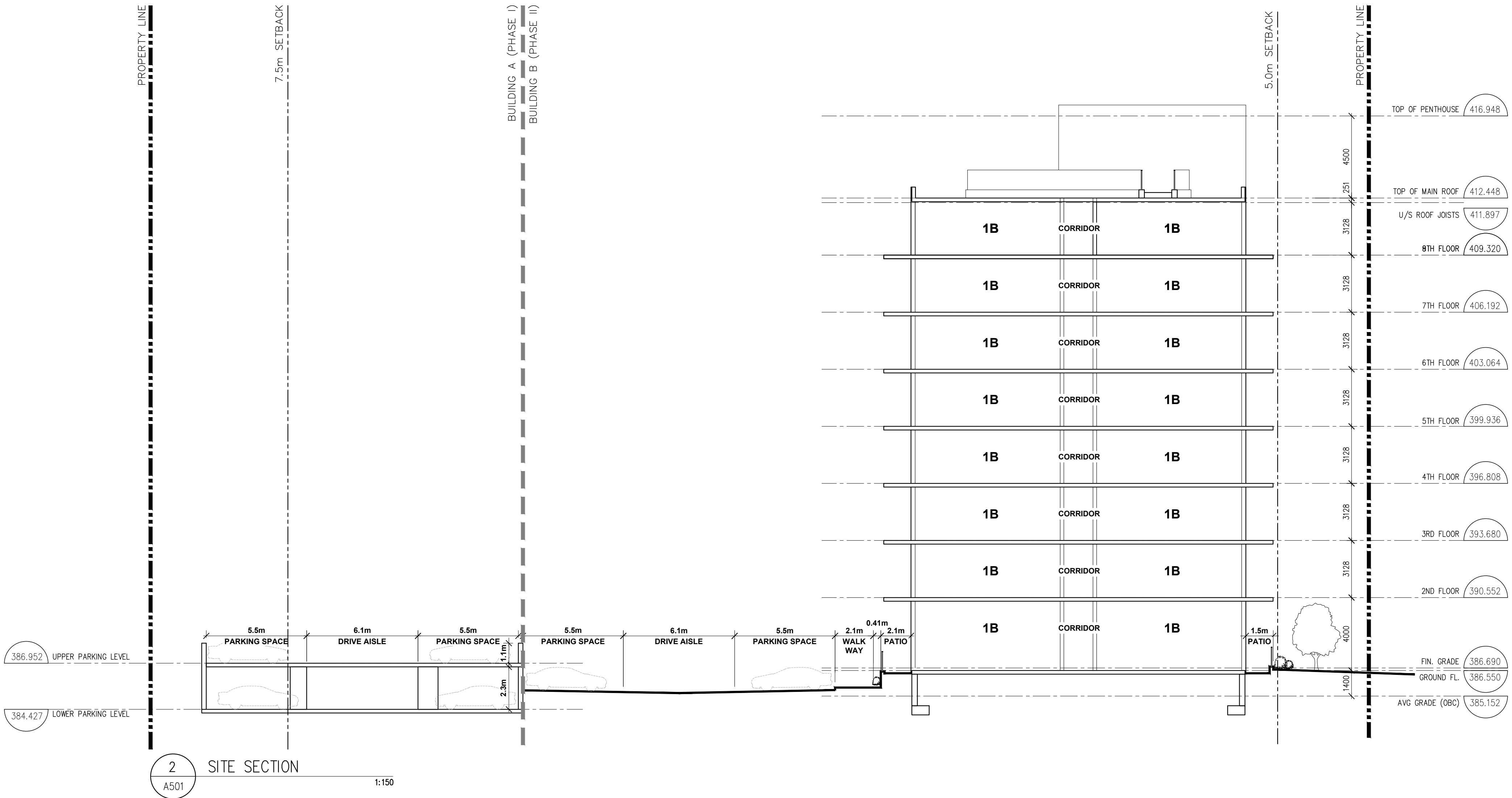
project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

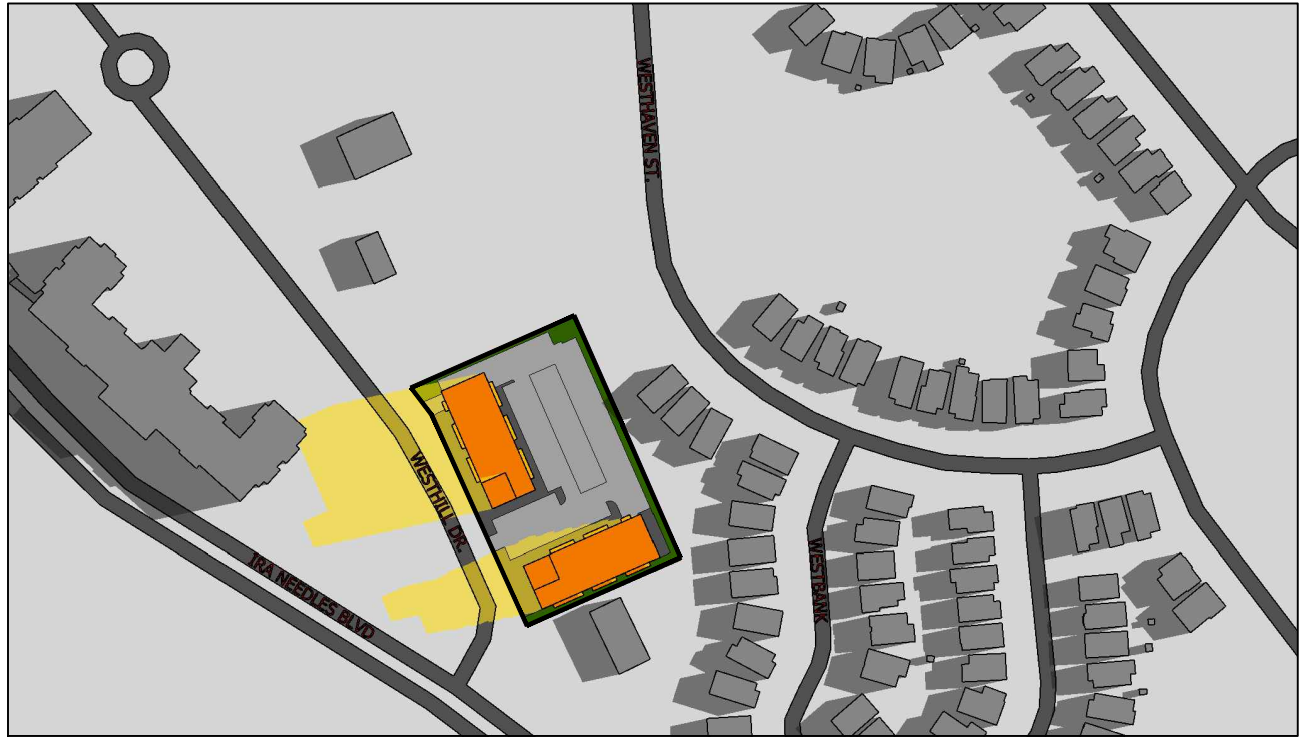
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date: august.07.2025  
scale: 1:150  
project: 25-24  
drawn by: eo / bd

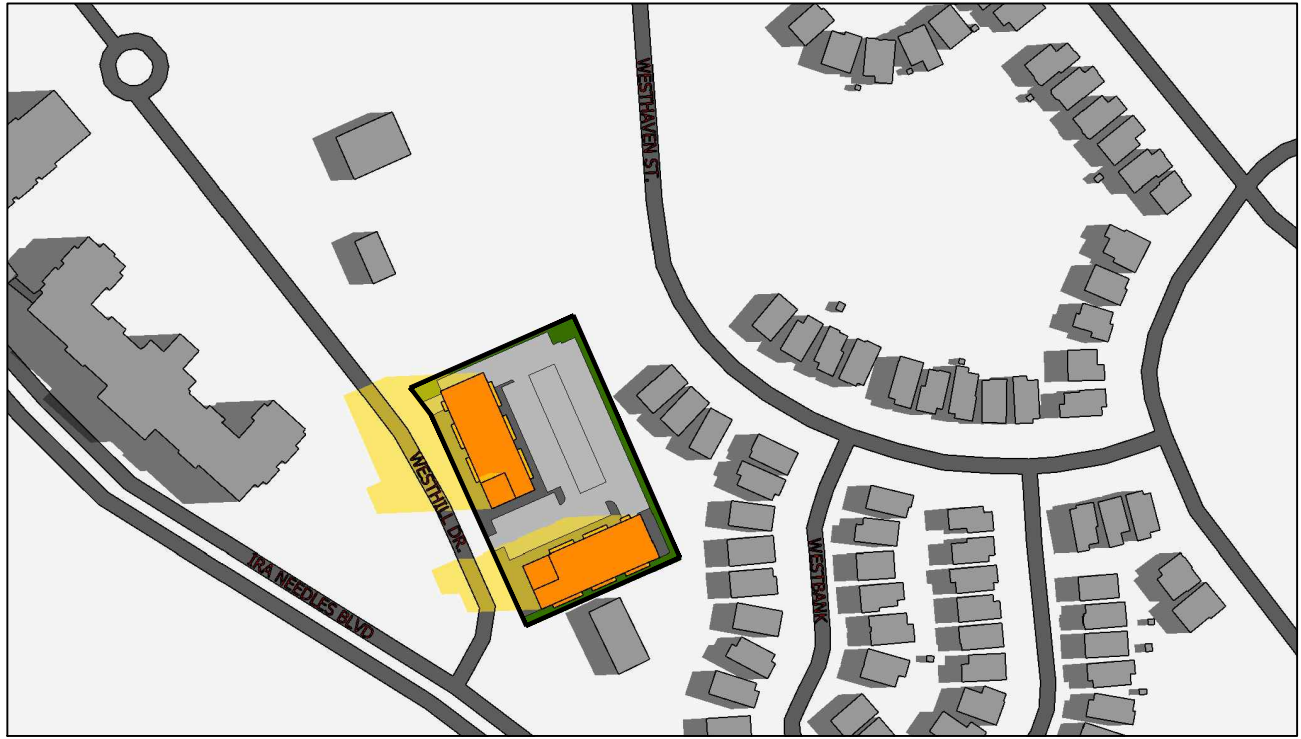
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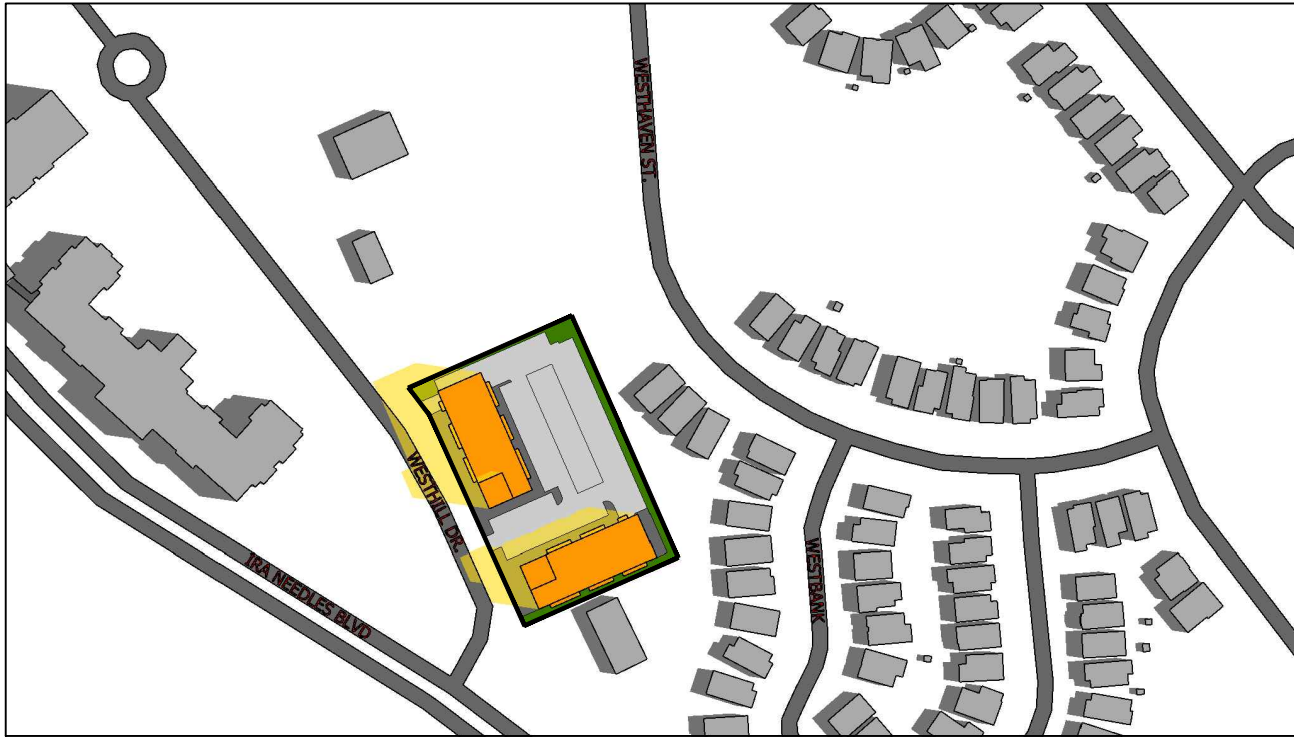




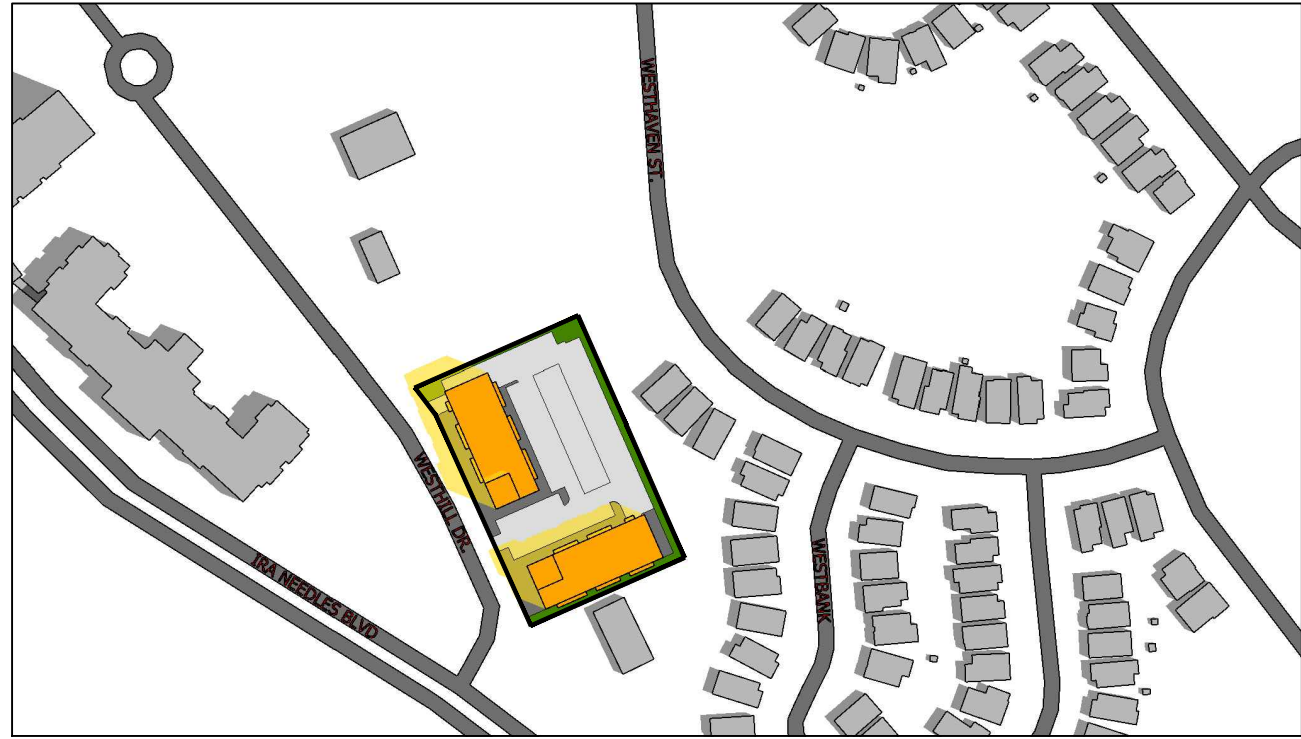
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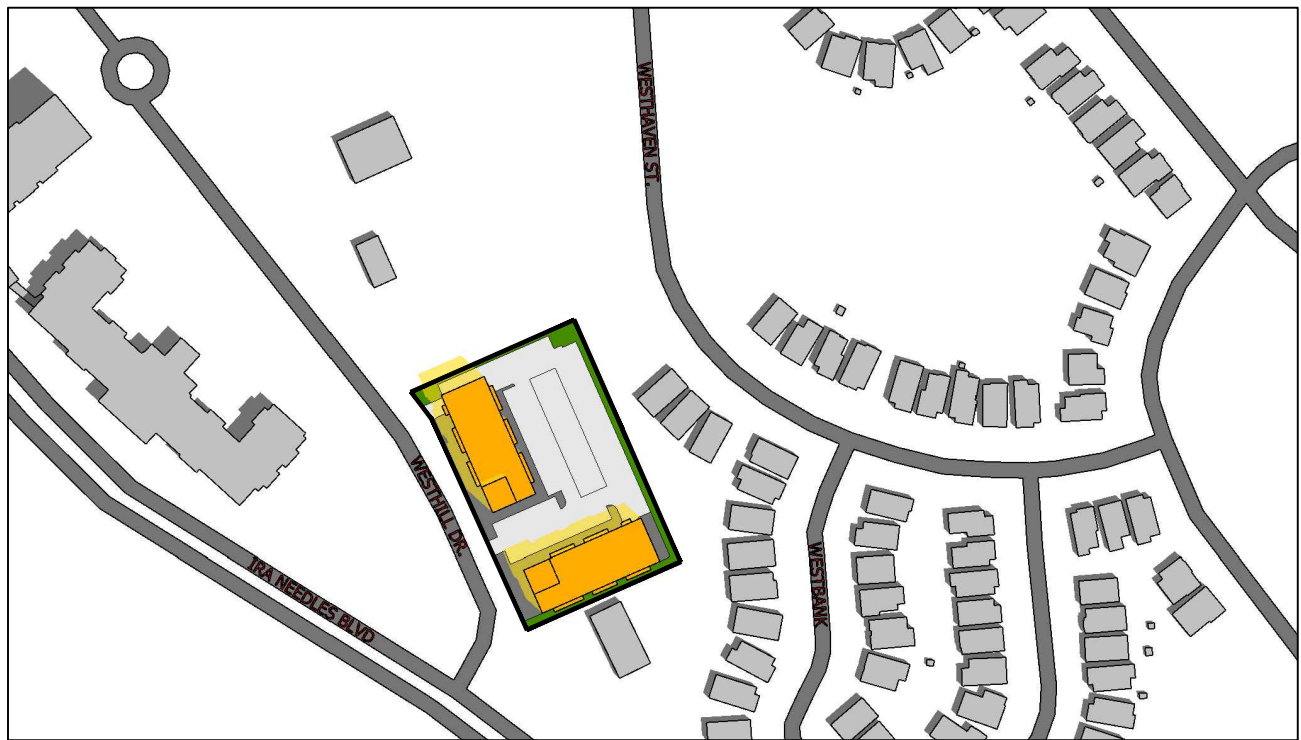
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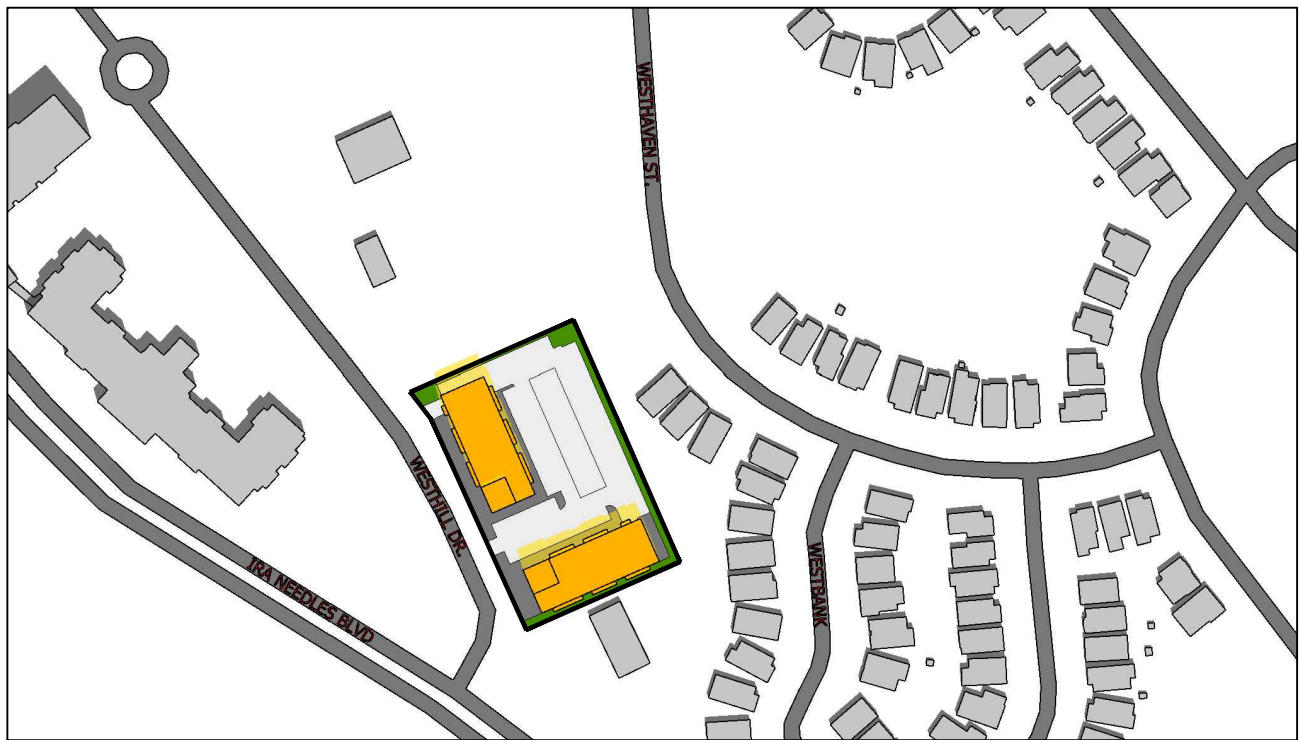
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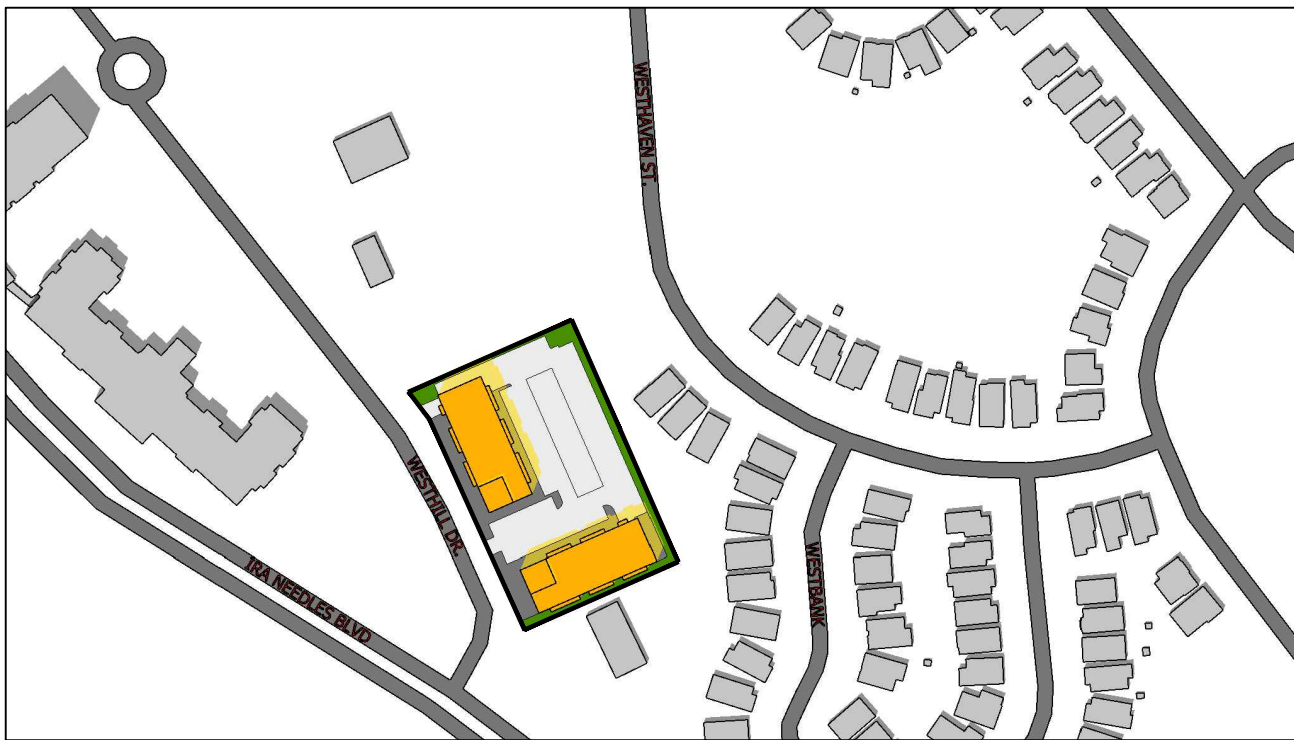
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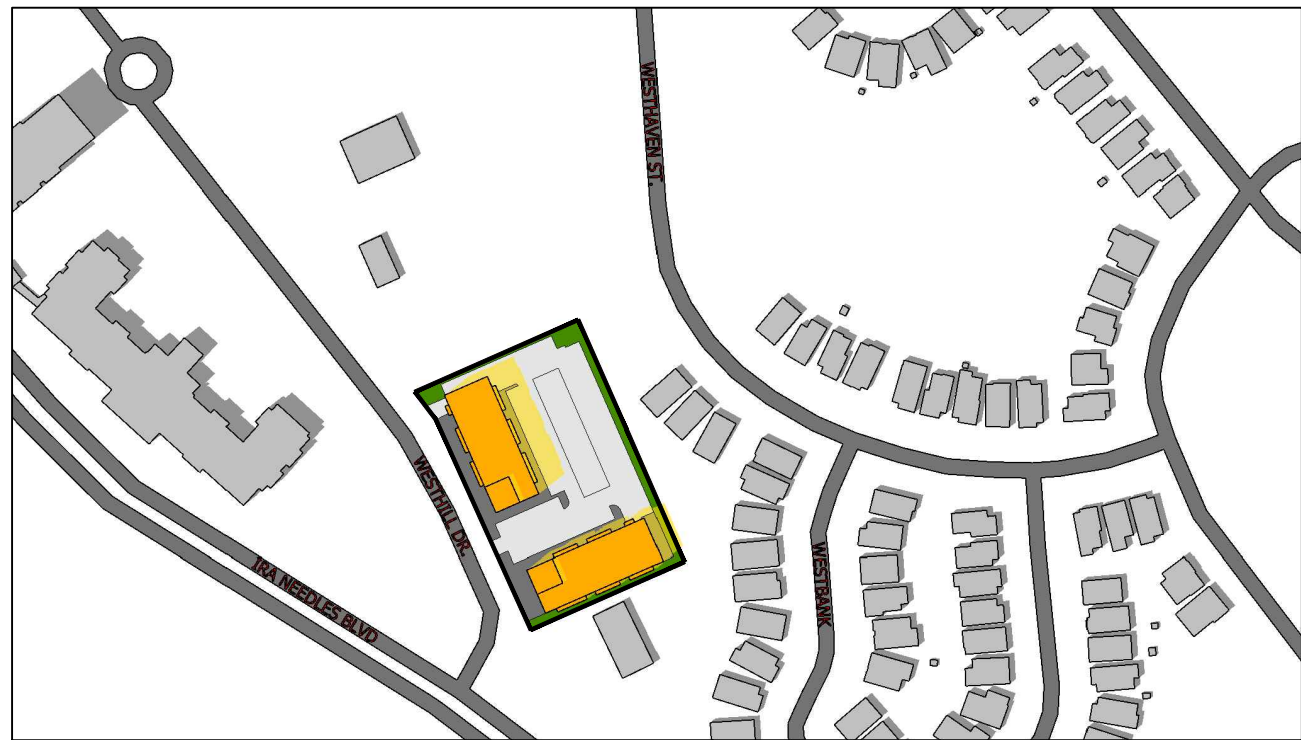
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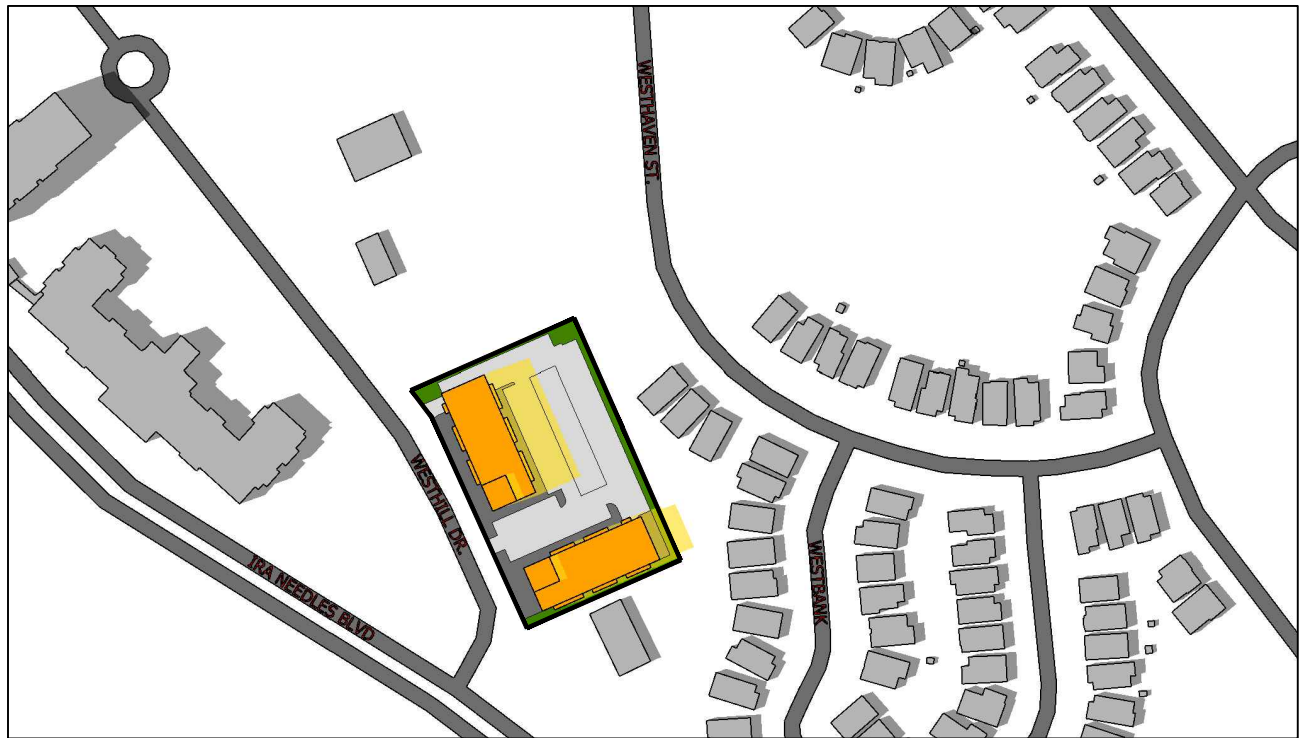
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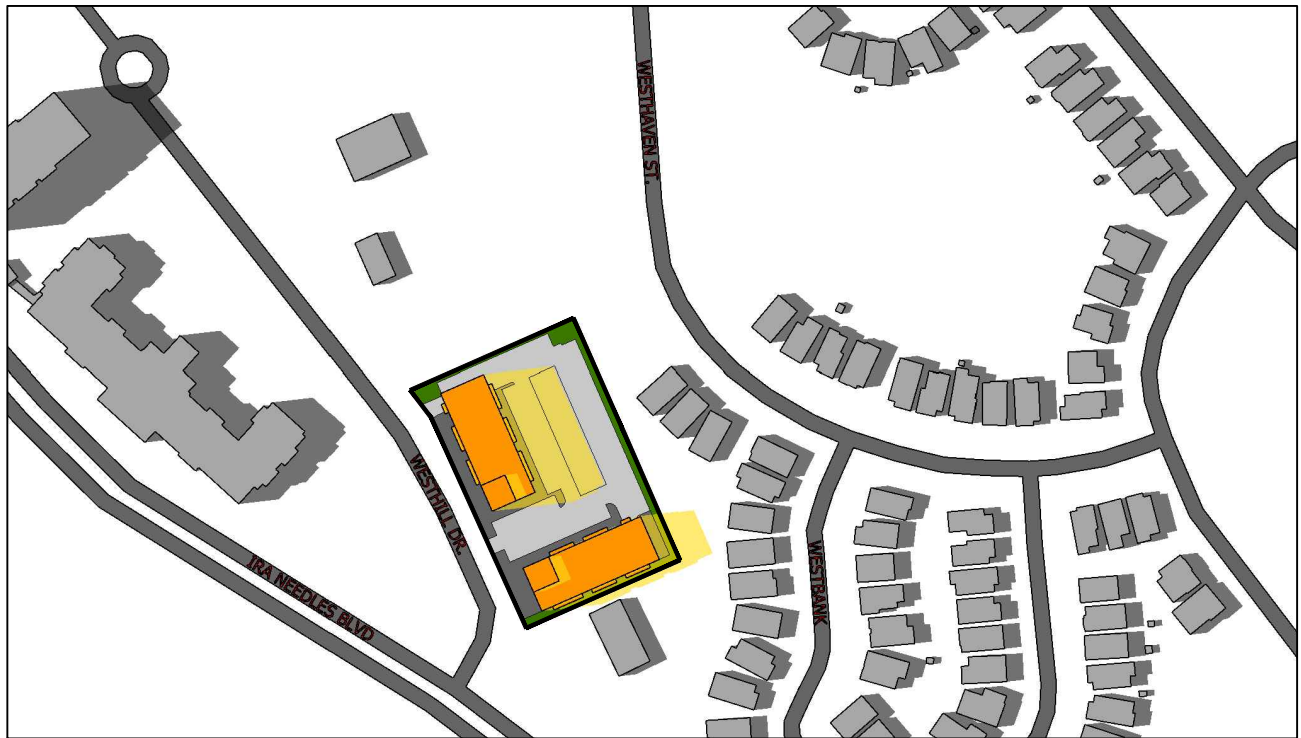
14:00 EDT



15:00 EDT



16:00 EDT



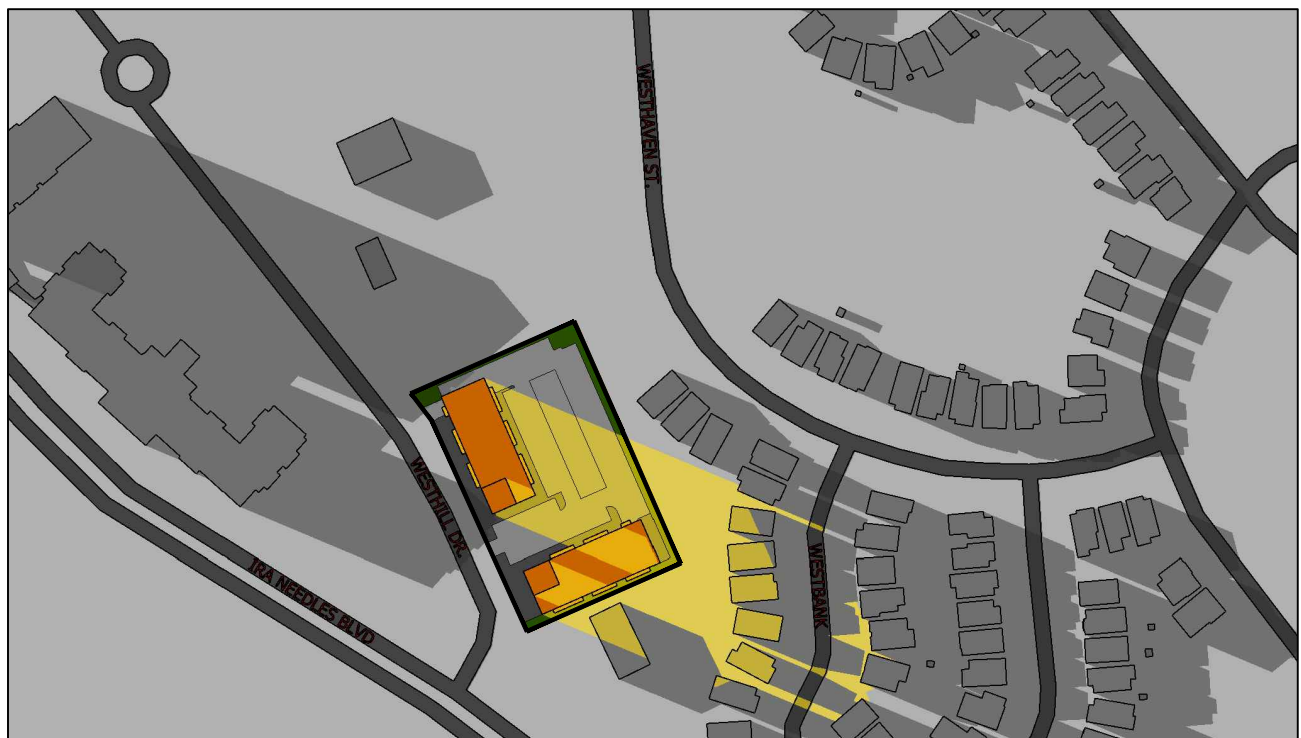
17:00 EDT



18:00 EDT



19:00 EDT



20:00 EDT

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notes:

2 issued for ZBA application 08.07.25  
1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuela ofori



planning:  
structural:  
electrical:  
mechanical:  
landscape:  
site services:

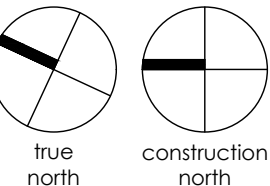
owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

shadow study  
june 21st

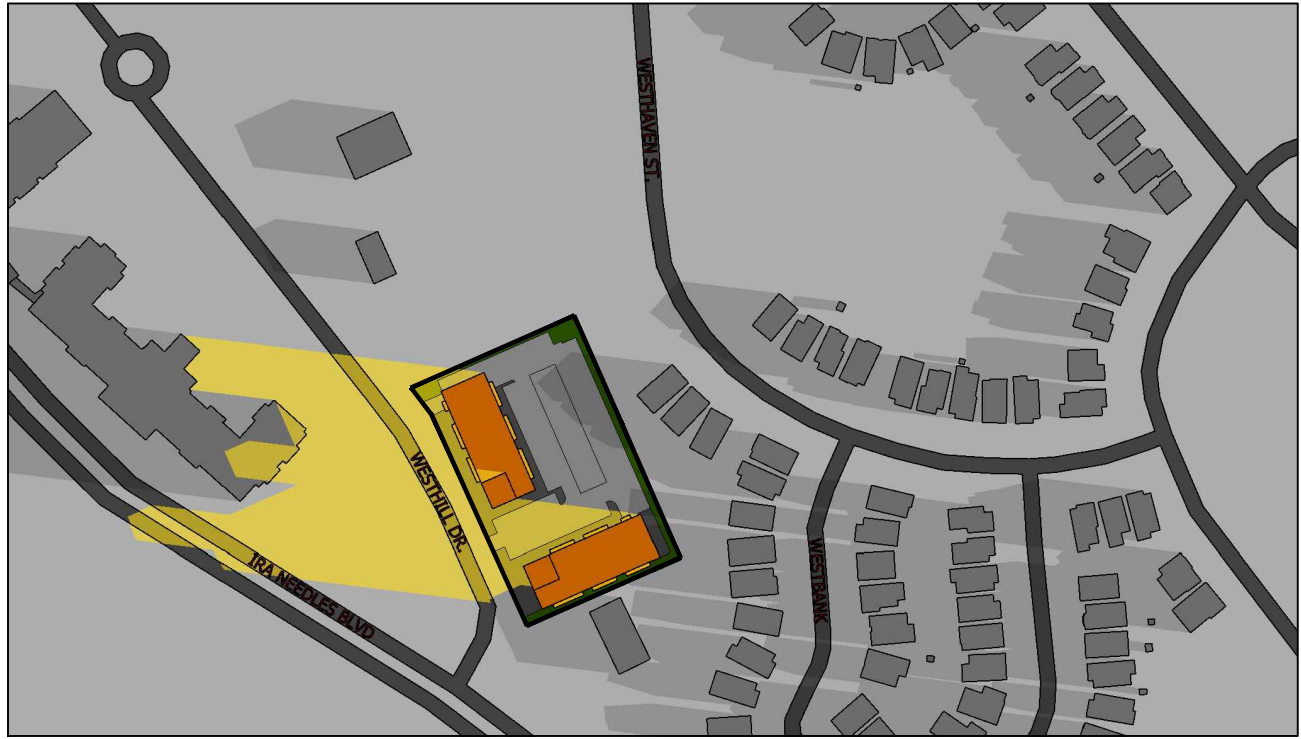
august.07.2025  
nts  
25-24  
eo / bd

date:  
scale:  
project:  
drawn by:



drawing number:

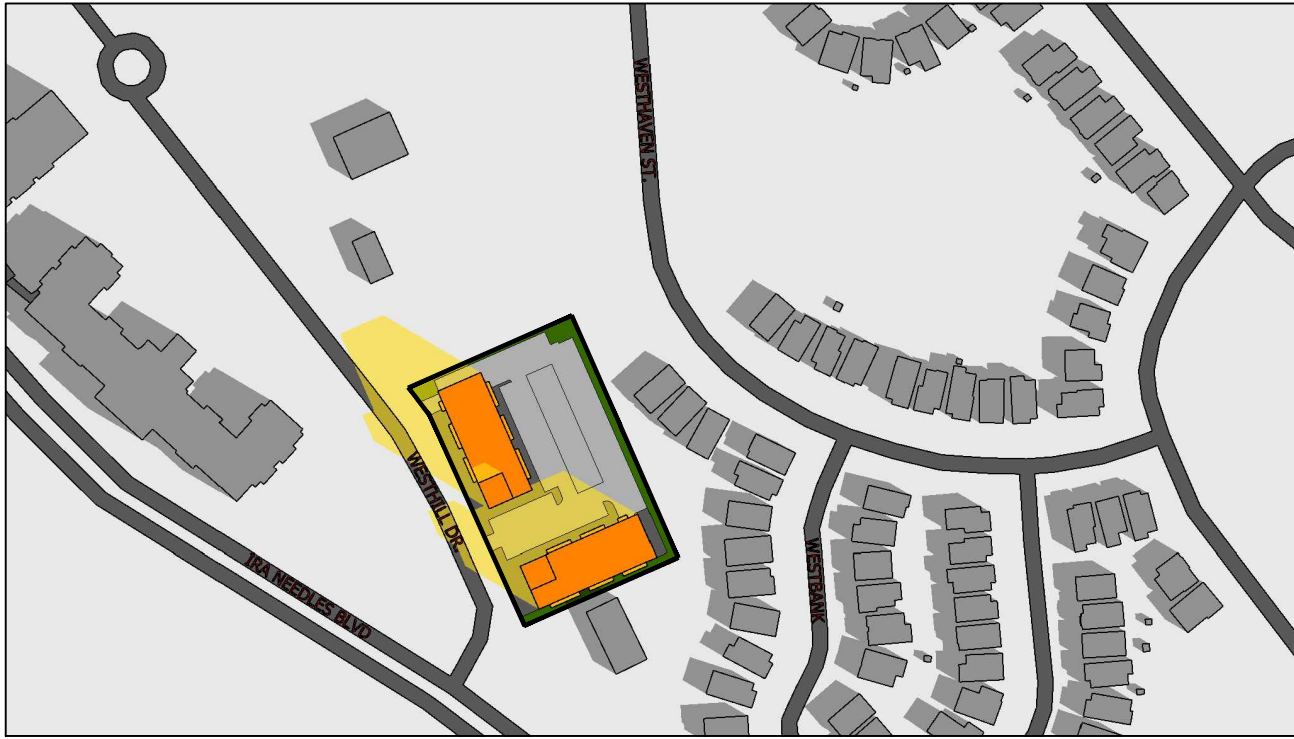
A601



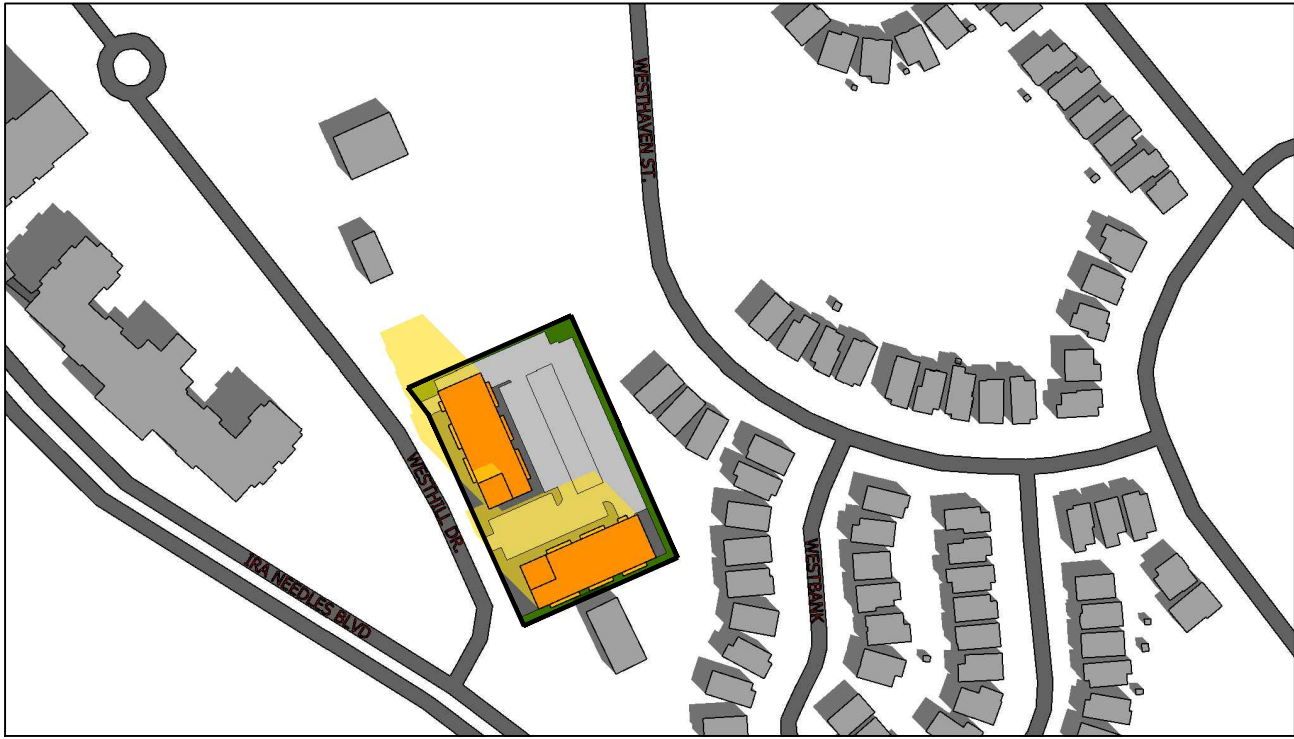
08:00 EDT



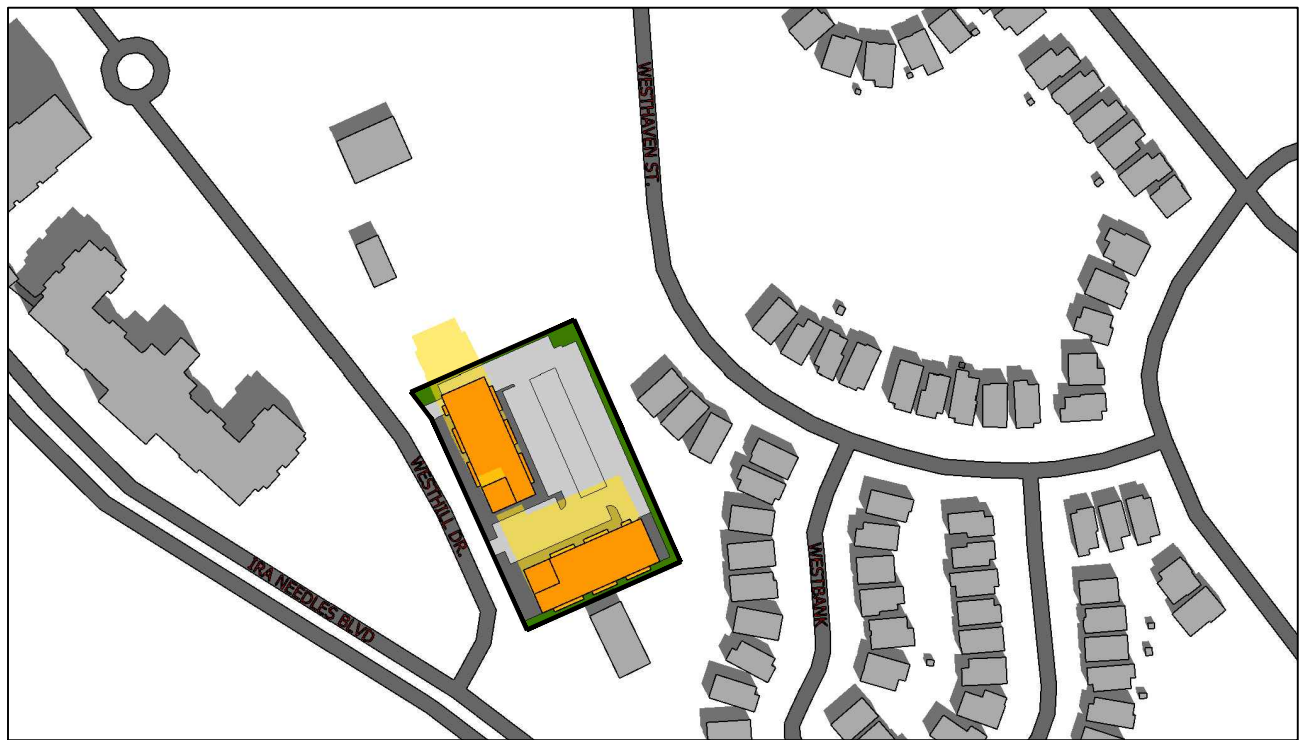
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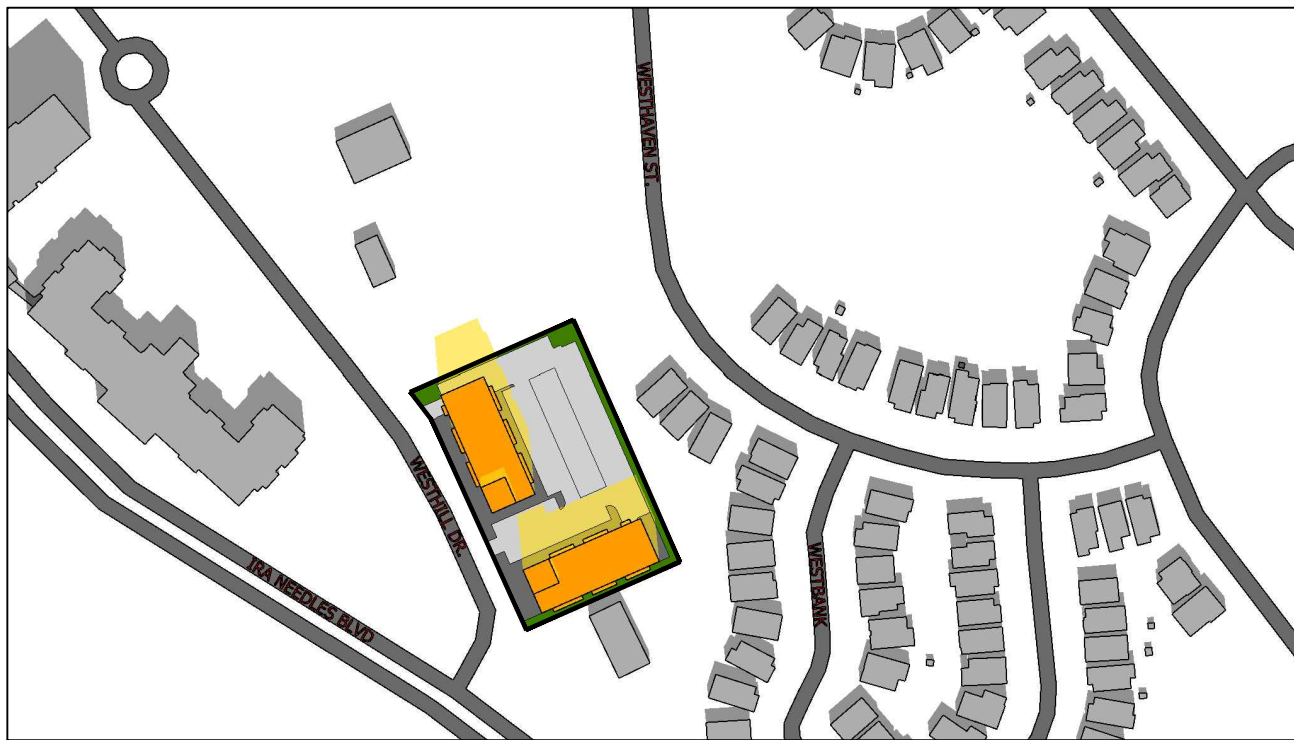
10:00 EDT



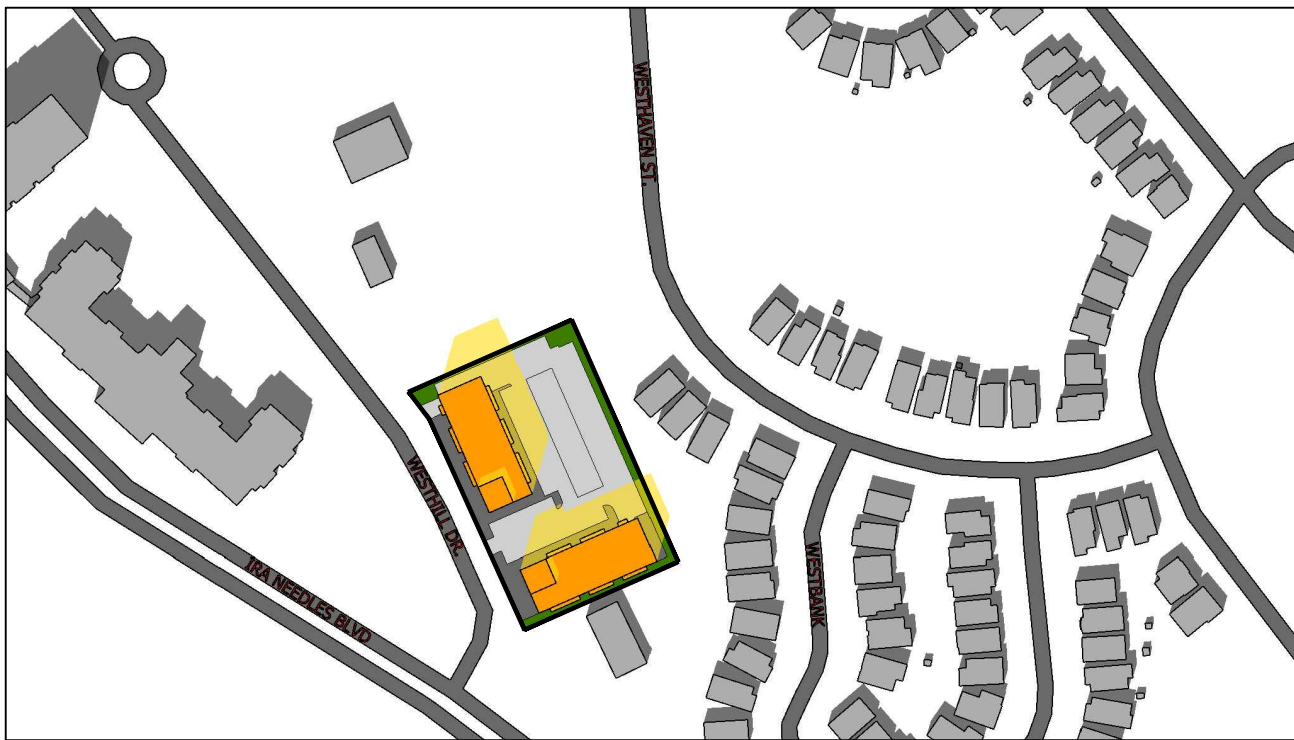
11:00 EDT



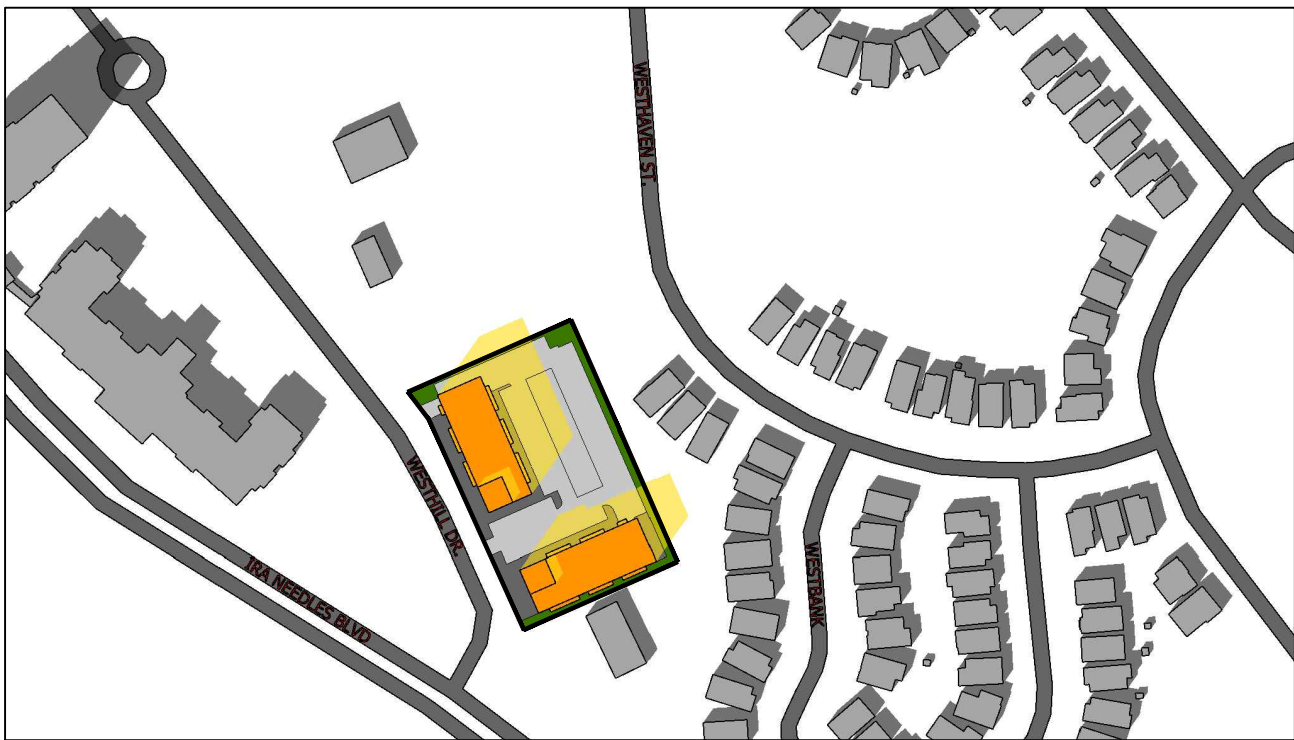
12:00 EDT



13:00 EDT



14:00 EDT



15:00 EDT



16:00 EDT



17:00 EDT



18:00 EDT



19:00 EDT

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notes:

2 issued for ZBA application 08.07.25  
1 issued for coordination 07.30.25  
revisions: mm.dd.yy

architectural team :

eduardo ortiz  
bonnie douthwright  
olena kobets-sikh  
emmanuella ofori



planning:

structural:

electrical:

mechanical:

landscape:

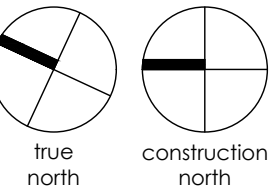
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owner:  
blackdoor development company inc.

project:  
Proposed Residential Development  
36 Westhill Drive  
waterloo, ontario

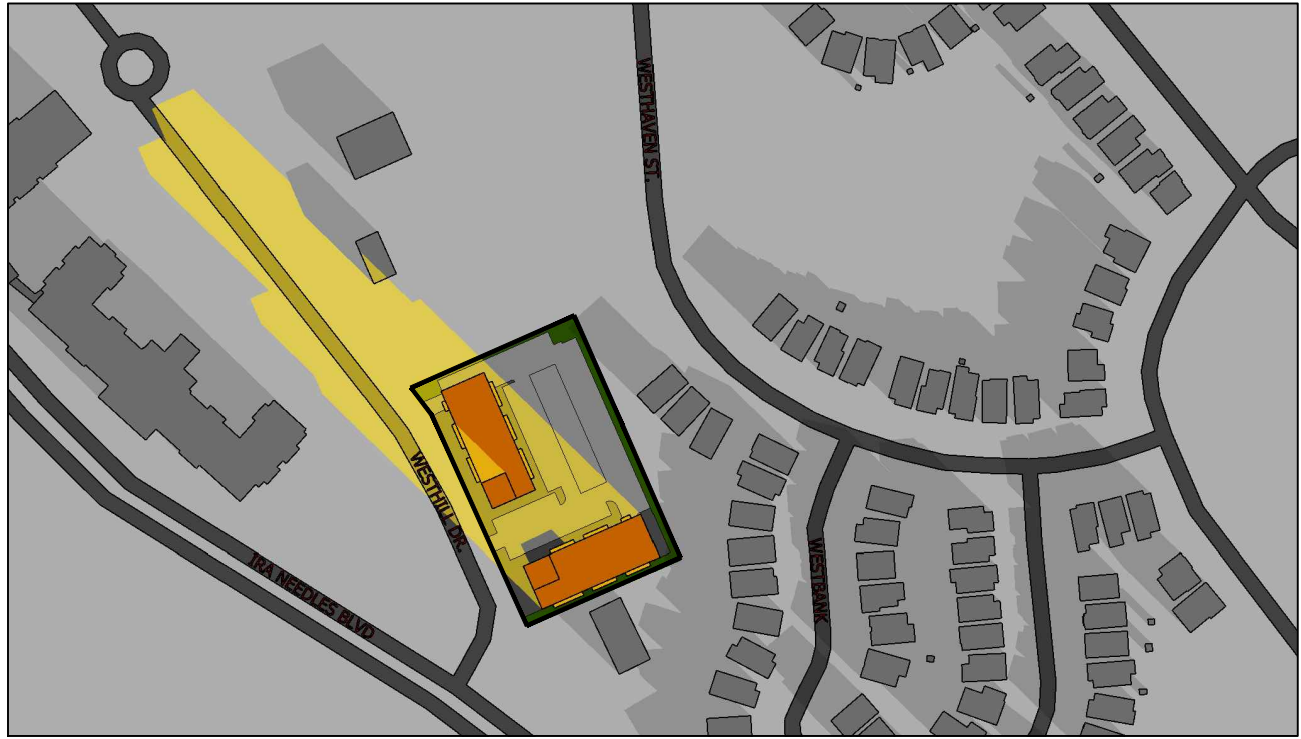
shadow study  
march/september 21st

august.07.2025 date:  
nts scale:  
25-24 project:  
eo / bd drawn by:

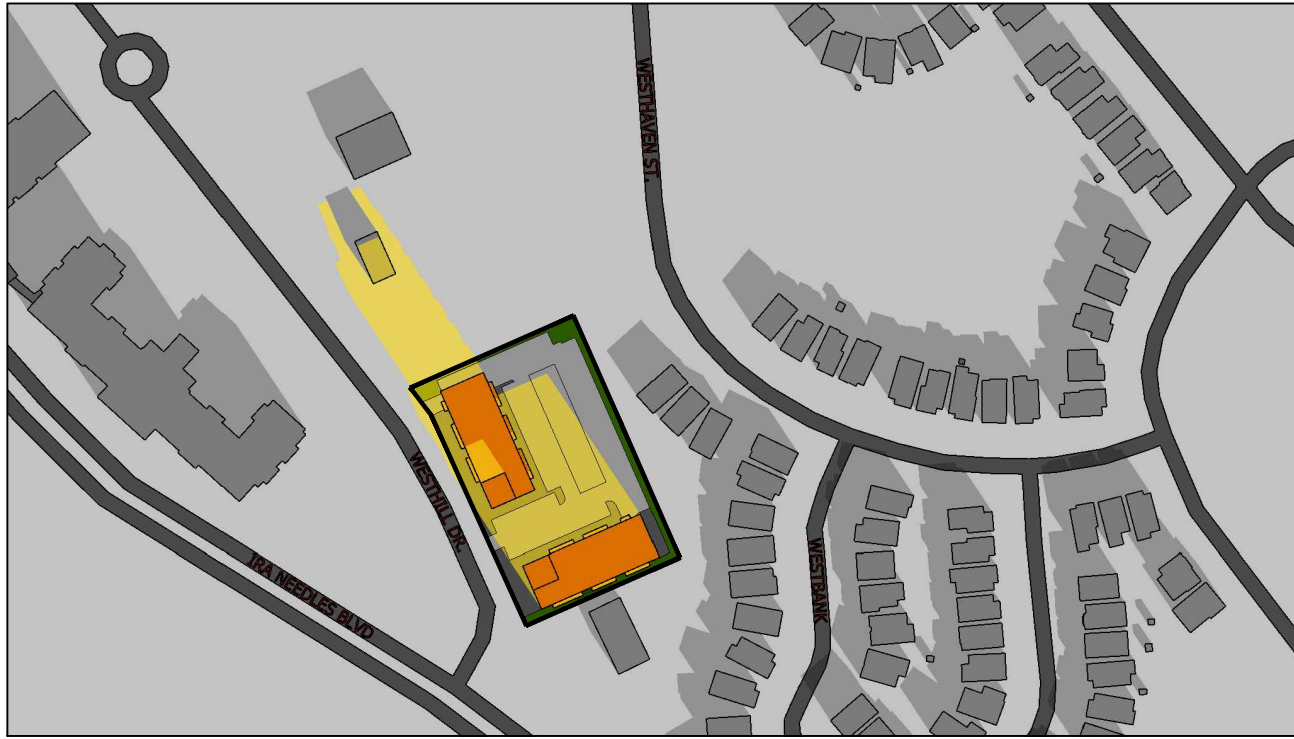


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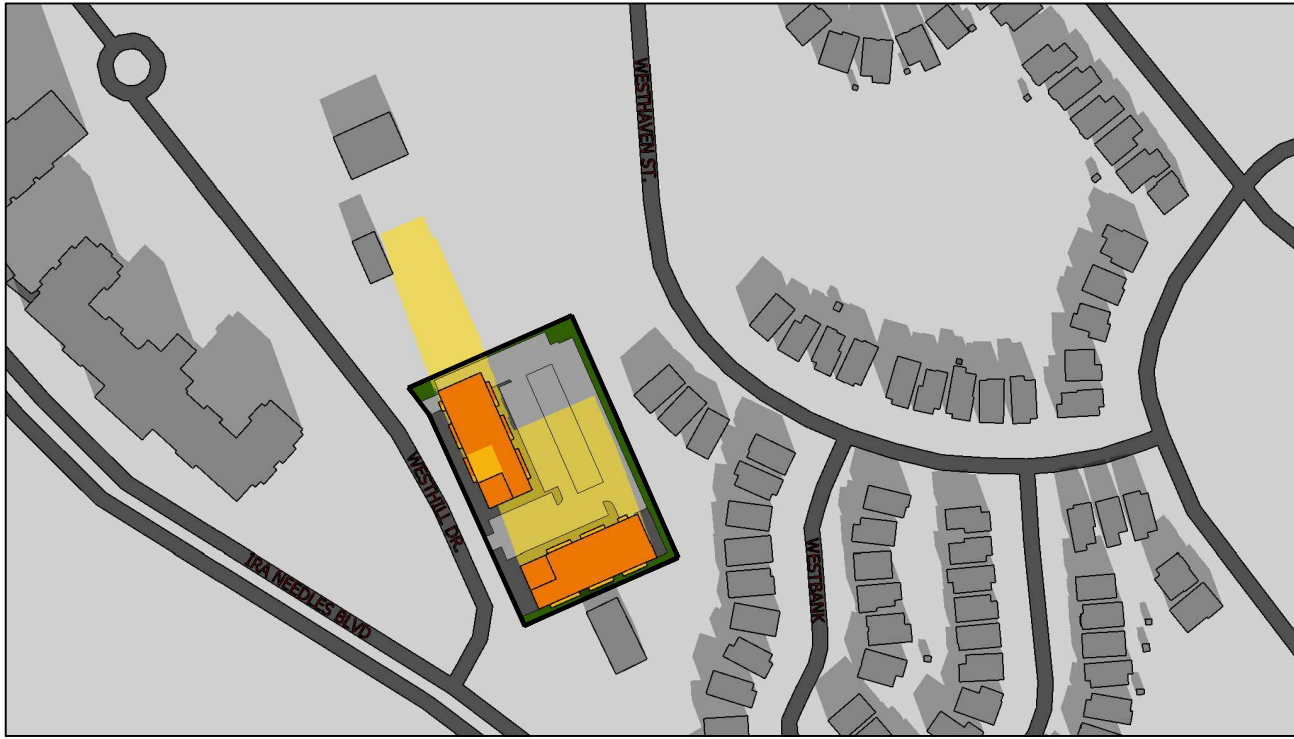
A602



09:00 EDT



10:00 EDT



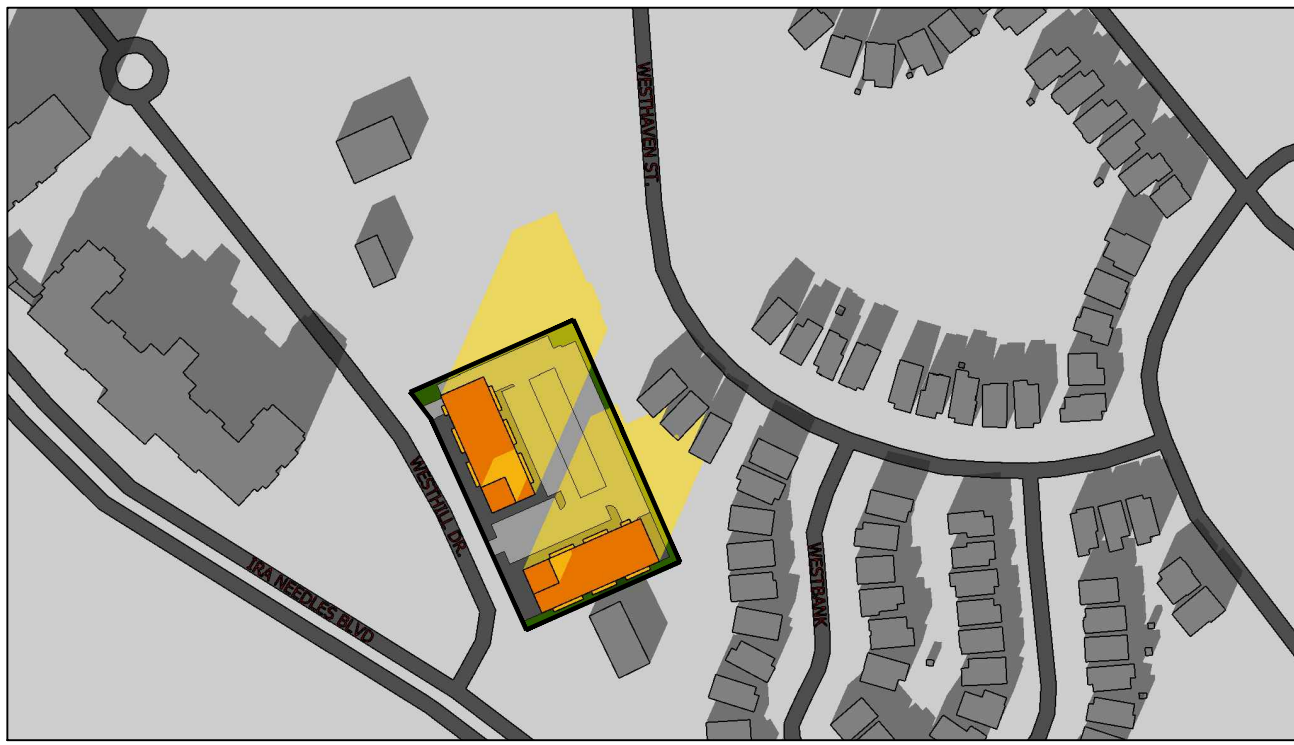
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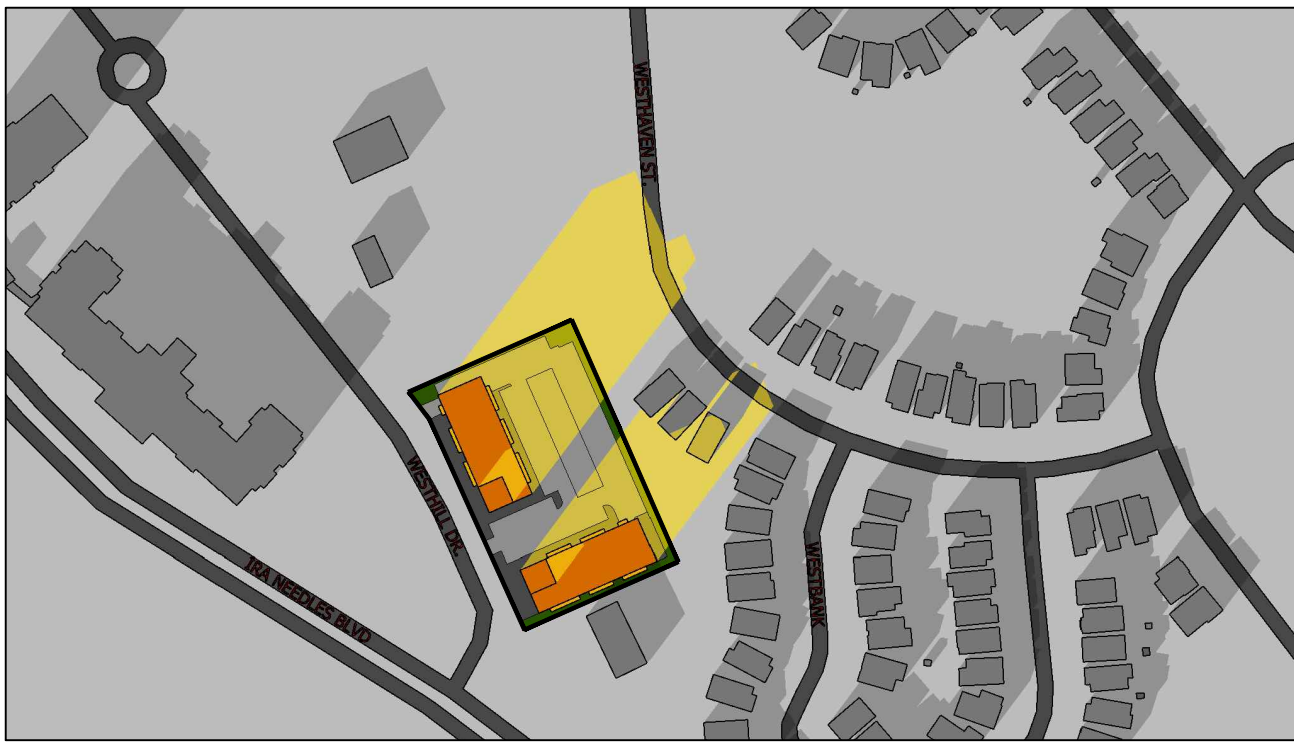
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14:00 EDT



15:00 EDT



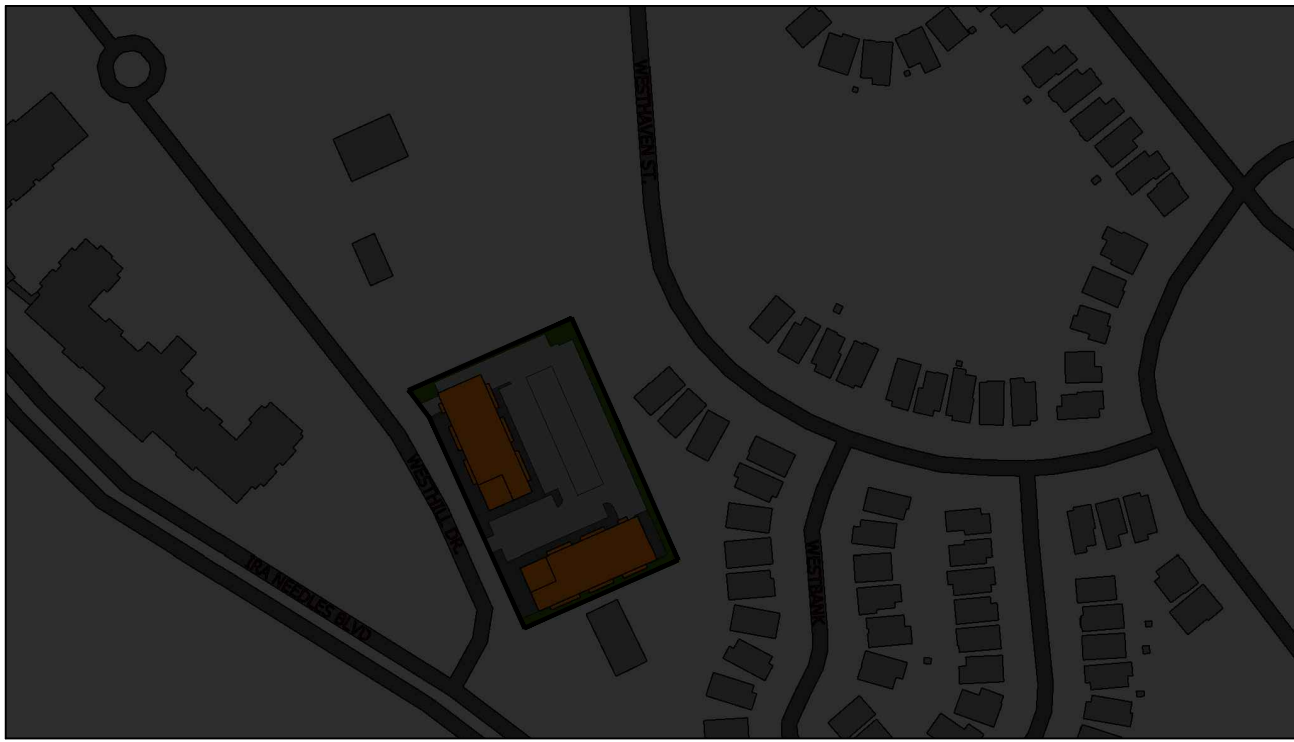
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17:00 EDT



18:00 EDT



19:00 EDT

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notes:

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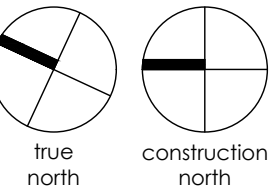
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|----------------|-----------|
| august.07.2025 | date:     |
| nts            | scale:    |
| 25-24          | project:  |
| eo / bd        | drawn by: |



drawing number:

A603