



PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

December 20, 2023

Jennifer Meader
TMA Law
25 Main Street West, Suite 2010
Hamilton, ON L8P 1H1

Dear Ms. Fisher:

**RE: URBAN DESIGN ADDENDUM LETTER / 109, 115 AND 133 BRIDGEPORT ROAD EAST
AND 30 WEBER STREET NORTH/ OPA 40 AND ZBA Z-22-10
OUR FILE 16222B**

This addendum letter has been prepared in response to the revised development proposal for the above noted properties. The purpose of this Addendum is to:

- Describe the revised (December 13, 2023) development concept, highlighting key changes from the original plans that were submitted;
- Respond to City Urban Design comments received in response to original Official Plan Amendment and Zoning By-law Amendment applications; and
- Confirm zoning relief required to zoning regulations related to tower design; and
- Confirm Vision, Goals and Objectives stated in the original MHBC Design Brief (August 2022).

Original Development Proposal:

The original development proposal included the following:

- Three towers ranging in height from 22-25 storeys, situated on a shared podium, with ground floor commercial uses within the podium facing Weber Street North;
- A 6-storey parking structure attached to the remainder of the development on the east side of the site;
- A total of 622 units (785 bedrooms), including 459 one-bedroom units (74% of total units) and 163 two-bedroom units (26% of total units);
- 345 m² of commercial floor area;
- A total of 569 parking spaces;

- A proposed outdoor landscaped plaza space along the Weber Street frontage; and
- Vehicular access from Bridgeport Road East in two locations and a single full movement access on Royal Street.

The original development proposal complied with the built form regulations of the proposed Mixed-Use Community Commercial (C1-81) and Residential Mixed Use (RMU-81) zone categories, and also complied with the existing RMU-20 zone regulations that apply to the eastern portion of the site.

The six-storey podium proposed in the original submission provided a shared base for all three towers. A landscaped rooftop amenity space was proposed on the 5th storey, serving all three towers. The podium also included structured parking, including bicycle parking.

Revised Development Proposal:

The proposed development has been revised in consideration of City and agency comments received regarding the original submission and the evolving development context within the City, including Council approvals for additional height and density in multiple locations. A detailed summary of the revised development proposal is included within the Supplemental Planning Justification Report (December, 2023).

A multi-tower, mixed use development that includes a shared podium with internal parking remains the focus of the revised development proposal – the general layout of the site and situation of the three towers remains similar to the original concept.

The following provides a summary of the key design related changes:

- The building has been shifted to the west (towards Weber Street) by 5.5 m, thereby increasing the physical separation and amount of landscaping along the shared lot lines with the low-rise residential dwellings to the east;
- The ground floor commercial area has been increased (from 345 m² to 645 m²) and relocated to the southwest corner, oriented primarily to Weber Street with additional frontage along Royal Street within the portion of the lands designated Mixed-Use Community Commercial;
- In recognition of changes to the definition of Landscape Open Space in the Zoning Bylaw made after the OPA/ZBA were accepted and processed, the amount of hard surface within the Bridgeport Road streetscape has been reduced;
- Height has been redistributed between the three towers and now ranges from 19 storeys to 35 storeys, with the greatest height (Tower A) located further from existing low rise residential development on Royal Street. Revised towers are described in more detail as follows:
 - Tower A – which is located at the corner of Weber Street North and Bridgeport Road East, furthest from the low-rise residential uses to the east, was increased from 25

Storeys to 35 storeys with the inclusion of a recession in the tower length above the 27th floor (approximately 9m) on the south elevation. The tower portion up to the 27th floor was lengthened from 40 to 44 metres, while the length of the tower above the 27th floor is 35 metres.

- Tower B – was 24 storeys and is unchanged, save for the tower moving further to the west, increasing the separation from 125 Bridgeport Road East (planned and zoned for medium density (6-storey) development).
- Tower C – Was reduced in height from 22 storeys to 19 storeys and shifted further to the west to better align with the zoning boundary on the south side of Royal Street (RMU-20, which permits 6 storey buildings)
- The parking structure on the east side of the site, which forms part of the overall building podium, was shifted further to the west and increased in height from 6 storeys (20.7 metres) to 8 storeys (24.5 metres) – a 3.8 m increase.
- The Podium was 6 storeys and is unchanged, save for the increased height to the parking structure which forms the easterly portion of the podium.
- The total number of units was increased from 622 units to 706 units. There has been an increase in two bedroom units and three bedroom units are now contemplated.
- The total amount of amenity area was increased from 4,221 m² to 6,741 m².

Podium

As previously noted, the podium has been shifted further to the west towards Weber Street North to provide additional separation from the lands to the east on Royal Street. The podium now also cantilevers over the westerly driveway access from Bridgeport Road to provide additional massing facing the street. The parking structure component of the podium, east of the driveway access along Royal Street, has been increased to 8 storeys (24.5 metres) in height to provide additional parking in support of the development. The westerly shift of the podium has increased building setbacks along the easterly property line to 16 metres from 196 Royal Street, allowing for additional landscape areas and physical separation.

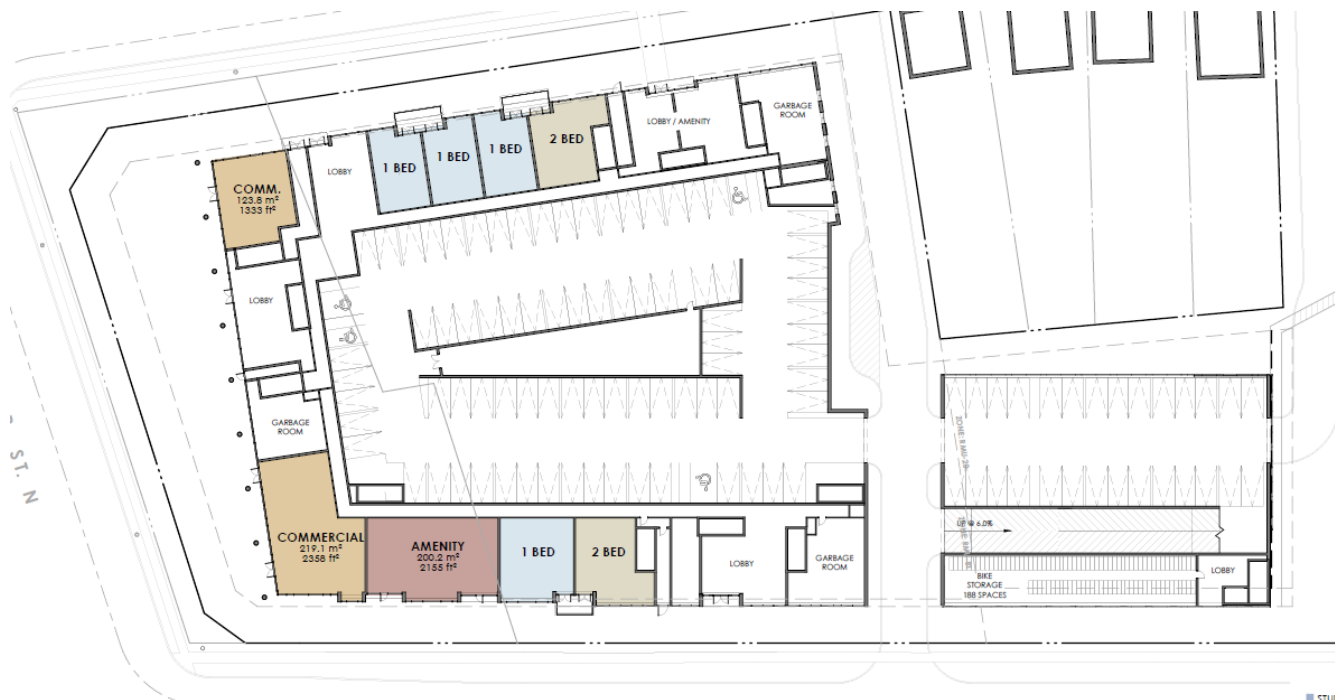
Uses within the podium have also been reconfigured to ensure active uses are situated along the street frontages, including amenity space, commercial space, and lobby entrances – there are no garbage rooms proposed along the street frontages. The ground-floor commercial space (proposed at the corner of Weber and Royal) has been increased to 645 m² in area or approximately double the previous amount. Ground floor amenity rooms are oriented to either the Weber Street, Bridgeport Road, or Royal Street frontages, along with lobbies for each residential tower and associated common areas (mail rooms, vestibules, etc.) Three dwelling units are proposed at-grade within the podium facing Bridgeport Road East outside of the portion of the site designated Mixed-Use Community Commercial. Garbage rooms have been located behind the above-noted active uses at grade and required transformers are included within vaults located within the podium. Parking along with secure

bicycle storage internal to the podium comprise the ground floor as well as the Royal Street parking structure component. Bicycle storage remains proposed for the frontage of the Royal Street parking structure component to screen vehicular parking at grade and to provide a convenient location for cyclists.

Ground Floor Space

In addition to increasing the amount of ground floor commercial space, other changes have been made to the ground floor layout in order to activate the streetscape through the provision of other active ground floor uses. The below compares the original ground floor design with the revised (December 2023) concept.

Ground Floor Plan (Original 2022 Submission)

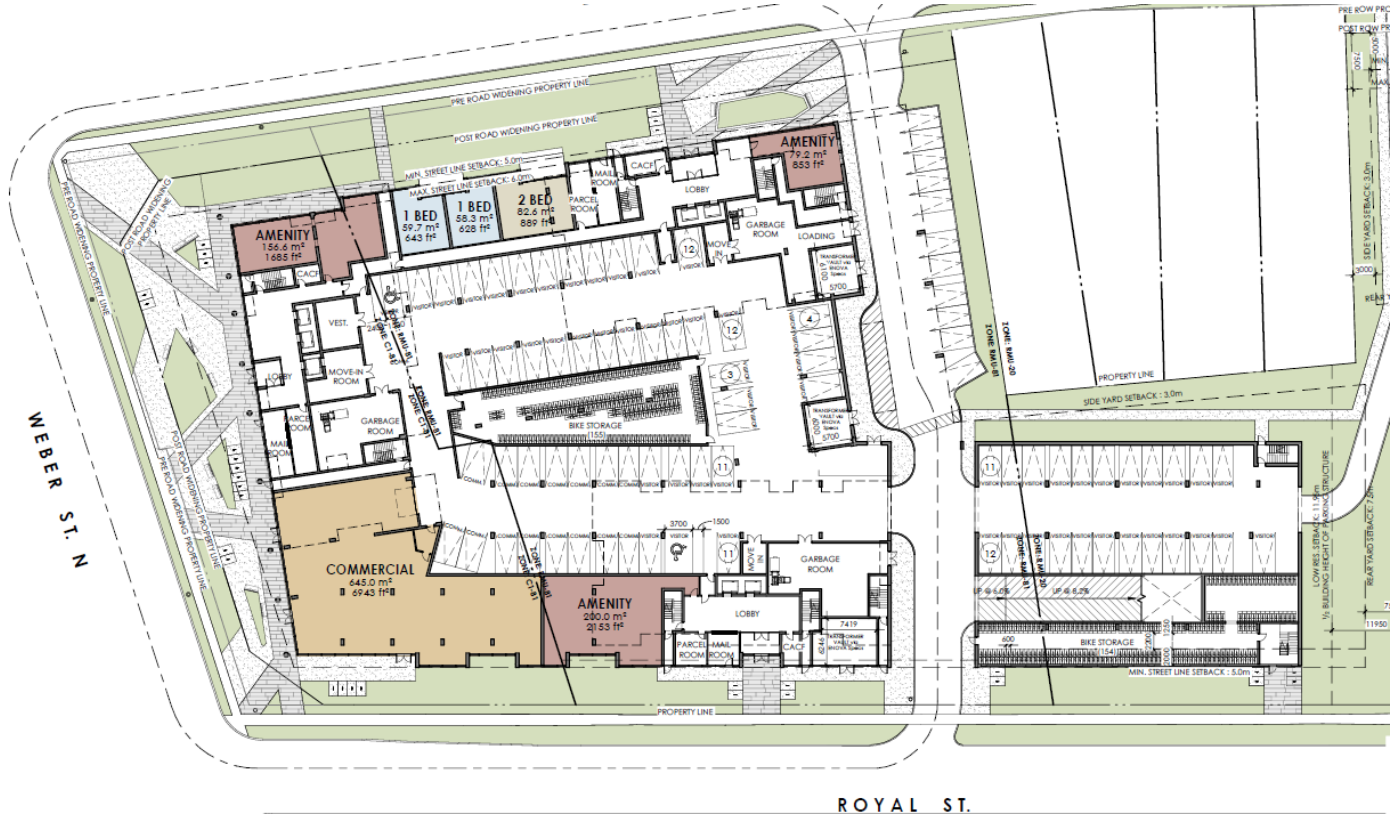


In the original submission (pictured above) the ground floor was designed with a number of active spaces including:

- Two commercial units;
- Lobby areas (with lobby areas adjacent to all three street frontages (one for each residential tower);
- An amenity space oriented towards Royal Street; and
- Ground floor residential units along the Royal Street and Bridgeport frontages.

In addition to the above, the ground floor contains parking (screened from abutting streets through the uses listed above). Functional elements such as garbage rooms were also proposed (to be screened through architectural façade design). All of the ground floor uses are connected through a common shared hallway. The parking structure on the eastern portion of the site contained a small lobby area and bicycle parking.

Revised Ground Floor Plan (December 2023 Submission)



When compared to the original submission, the ground floor plan in the December 2023 resubmission has a significant increase of commercial area and amenity area. The following summarizes key changes to the ground floor design:

- Commercial areas consolidated into a large commercial area with frontage on both Weber Street N. and Royal Street.
- Amenity space increased from one amenity area to three amenity areas (one for each residential tower). There are now amenity spaces facing each of the surrounding public streets.
- Garbage areas have been relocated internal to the floor plan.
- A reduction of ground floor residential units has been provided to allow for increased amenity/commercial space.
- Each tower continues to have lobby space visible from the surrounding streets.
- The eastern parking area continues to have a lobby area and bike storage, both of which screen the vehicle parking from the street. Design of the façade for the eastern portion of the building will ensure an attractive streetscape along Royal Street.

Landscape Open Space

As illustrated in the revised drawing set, the amount of greenspace adjacent to the podium has been increased, providing for larger planting areas among plaza walkways, and reducing the amount of hard surfaces along the north and south sides of the podium. Building entrances along these frontages primarily rely on walkway extensions from the public sidewalk. The plaza element along the Weber Street frontage has been maintained, whereas the enhanced plaza entrance at the northeast corner of the podium has been reduced and planting areas adjacent to the podium enlarged in recognition of recent changes to the definition of Landscape Open Space in the City's Zoning Bylaw, which no longer consider certain forms as hardscaping as landscaped area.

The westerly shift of the podium has also facilitated an increased landscaped area along the easterly property lines as follows:

- the proposed surface parking area is located 3.1 metres from 125 Bridgeport Road East property line (whereas previously it was 1.6 metres);
- the one-way driveway access along Bridgeport Road East is located 7.5 metres from 135 Bridgeport Road East lot line (whereas previously it was 6.1 metres); and
- the Royal Street parking structure component of the podium is 16 metres from the 196 Royal Street lot line, whereas previously it was 10.5 metres.

The most notable improvements to the landscaped open space as a result of the revised development proposal is along the eastern limit of the site, where a significant portion of the property is intended for landscaped area and is of a sufficient size and configuration to accommodate variety of mature trees, shrubs, and other vegetation.

Response to Urban Design Circulation Comments:

The City of Waterloo provided detailed comments in February 2023, which also included comments from City of Waterloo urban design staff. The following provides a detailed response to the urban design comments, taking into consideration the revised development concept:

City Urban Design Comment	Response
A high standard of urban design is strongly encouraged, including (but not limited to) the articulation of building facades through the use of varying materials, activation along street frontages, contextual massing, pedestrian scaled design, high quality and well designed landscaped open space, and the integration of CPTED principles. The development must comply with the Urban Design policies of the Official Plan (Section 3.11) as well as the City's Urban Design Manual. Specific design considerations are as follows:	Responses to each design consideration comment are provided herein. In our opinion consideration should be given the City's Urban Design Manual, however guidelines are intended to allow for flexibility and latitude.

Built Form	
The proposed building heights, if approved, will be the first of their kind within this node. As such, the highest standard of design, architecture, and finishes is expected to establish a new standard for this area. These landmark buildings will be visible from all directions (including Bridgeport Road which is a gateway road to the Urban Growth Centre), and should therefore further enforce the requirement for exceptional design.	Noted. The exterior building design will continue to evolve through the detailed site plan process. High quality, durable building materials are proposed in combination with enhanced landscaping along street frontages. By revising the tower heights, Tower A now provides for a landmark tower within the overall development. It is noted that a settlement has been presented to the Tribunal for a 27 storey building in the same node at 81-85 Bridgeport Road.
An increase to the amount of commercial spaces will help to attract premiere tenants at this Primary Node, and to animate the large open space (fronting on Weber Street).	As previously noted, the ground floor commercial area has been increased (from 342.9 m ² to 645 m ²) and relocated to the southwest corner, oriented primarily to Weber Street with additional frontage along Royal Street within the portion of the lands designated Mixed-Use Community Commercial.
Consider incorporating amenity spaces and/or more animated uses at grade within the parking structure on Royal Street.	As illustrated herein, significant changes have been made to the ground floor design to increase amenity space and commercial space within the ground floor.
In addition to staff's review of the Shadow Study (below), consider shadow impacts on the amenity terrace when designing programming.	A detailed response to shadow comments is provided herein. Programming of the amenity terrace will consider the extent to which this area is in shadow.
Staff strongly encourage the applicant, particularly for a development proposal that will be the benchmark for intensification within this node, to set a precedent for environmental innovation in construction, materials, and operation.	Noted. High quality, durable building materials are proposed.
Plaza Space	
The large plaza and gathering spaces along Weber Street and Bridgeport Road are great contributions to the public realm, and could evolve into popular civic gathering spaces. Consider incorporating many more trees within additional softscaped areas, and/or within structural soil cells with tree grates within the plaza spaces. Trees will help soften the hardscape, as well as help with microclimate and four season enjoyment of these spaces.	The revised proposal continues to show the large plaza area along Weber Street and Bridgeport Road. In addition to the plaza area, the revised development concept has increased the landscape area along the eastern limit of the site. This area is now of a size and configuration to accommodate variety of mature trees, shrubs, and other vegetation. Landscape plans prepared as part of the future site plan process will seek to maximize tree planting opportunities.
At the January 16, 2023 Informal Public Meeting, it was noted that the applicant intends to	Noted. Detailed design of this area will occur through the future site plan approval process.

enhance the Bridgeport Road and Weber Street streetscapes, and that the proposed plaza adjacent to westerly facade will act as a key focal element of the site. The potential for incorporating public art in the proposed plaza was also mentioned. Staff are supportive of these proposed design measures.	
Wind	
The Pedestrian Wind Assessment (SRL, February 16, 2022) that has been submitted in support of the OPA and ZBA applications has identified areas where mitigation is required to address adverse wind conditions. These include the northwest and southwest corners of the proposed development. Staff will expect mitigation measures to be identified and applied at site plan.	Noted. Future site and landscape plans will be coordinated with wind study recommendations.
Shadow	
Staff have reviewed the Updated Shadow Study (MHBC Planning and ABA Architects, dated September 22, 2022) that has been submitted in support of the OPA and ZBA applications. The Study indicates that in the spring, summer and fall, “the surrounding lands have full sun for at least 4 hours on at least half of their lots, which is consistent with the Guidelines.” The City’s shadow criteria requires shadow output to be provided at specified intervals, including 10am, 12pm, 2pm, 4pm and 6pm. The 6pm output has not been provided. While the 6pm output is unlikely to effect the conclusions drawn for the summer, it would appear that the shadow criteria would no longer be met in the spring and fall for the properties at 125, 127, 129 and 131 Bridgeport Road East.	The City has established two guidelines for the consideration of Shadow Studies within the Urban Design Manual: • As a principle, at least 50% or more of any property should not be shaded for more than two interval times (a 4 hour equivalency); or • As a principle, at least 50% of any property should be in full sun for at least two interval times (a 4 hour equivalency). Shadow studies have been updated to reflect the current (December 2023) concept and are attached to this letter. For the Spring and Fall the shadow impacts are summarizes as follows: • At 10 am there is no shadow impact from the proposed towers. Shadows from the eastern portion of the parking garage fall on a portion of 127 Bridgeport Road East and on the majority of 125 Bridgeport Road East. It is noted that both of these properties are heavily treed and as such, the

	entirety of these backyards would already be in shadow at 10 am from the trees within the rear yards of these lots. It is also noted that 125-131 Bridgeport Road East are extremely deep lots (averaging 48 metres deep) and have rear yards ranging from approximately 28 metres to 34 metres in depth. • At 12 pm shadows from the parking structure fall on approximately 50% of the rear yards for 125, 127 and 129 Bridgeport Road East. The majority of 131 Bridgeport Road East remains with full sun. The portion of the rear yards impacted by shadow at 12 noon are again heavily treed and would already experience full shade at this time of year. 131 Bridgeport has more useable rear yard space at the front of the backyard, this area is not impacted by the proposed development. • At 2 pm there is a partial shadow from the tower along Royal Street and shadows from the parking structure along the back third of the rear property line. Again, all areas impacted at 2 pm are already impacted by shadows from existing trees. • At 4 pm shadows are longer. This is the only timeframe in which the actual homes along Bridgeport experience shadows from the proposed development. By 6 pm the shadows are within the rear yards and all areas experience the sun starting to set. When reviewing shadows against the City's criteria it is important to note existing conditions. In this case the properties impacted by shadows are already impacted from dense vegetation and do not currently experience full sun; and the lots are at a depth such that rear yards are up to 34 metres deep. 131 Bridgeport Road East has the most open rear yard space and this area will have full sun for a consecutive 4 hours.
--	--

For the winter shadows (December 21), the study notes that the adjacent lots on Bridgeport Road East "are mostly impacted". For clarity, concluding statements should reflect whether or not the City's shadow criteria is being met. In reviewing the output provided, the shadow criteria does not appear to be met at 125, 127, 129, and 131 Bridgeport Road East.	Shadows are longest in the December time periods with even single detached dwellings causing long shadows in the morning and evenings. Shadow impacts are typically acceptable as rear amenity space is used far less frequently in winter months. Between 10 am and 12 pm there are shadows from the eastern portion of the parking structure. At 2 pm there are shadows as a result of the proposed towers. It is noted that even that the permitted 12 storey building height, it expected there would be shadow impacts in the winter months. Likewise, the previous scheme, which had a 6-storey parking structure caused winter shadow impacts, so even an as-of-right building could not meet the guidelines.
Please provide an addendum report that includes the 6pm shadow output for the spring, summer and fall with conclusions that indicate whether the shadow criteria has/has not been met, confirm which buildings are impacting the surrounding lands and to what extent, and provide recommendations as to how the shadow criteria can be achieved on all surrounding lands.	The 6 pm shadow output has been added to the revised shadow studies attached herein. In June, when rear yard space is most frequently used, the Bridgeport properties receive full sun for a period of four consecutive hours (not including any shadows caused by trees within the properties themselves). In the Spring and Fall properties partially impacted are already experiencing full shadow from trees within the properties themselves. As such, these properties do not meet the City's criteria currently. In December there will be impacts given the length of shadows in winter months. It is anticipated that a fully zoning compliant development on the subject lands would still have shadow impacts on the Bridgeport properties during winter months. Efforts have been made to reduce these impacts by placing the greatest height away from the Bridgeport properties and by exceeding the City's tower separation regulations. As such, as of right towers could be placed on the property that may have equal or greater impacts to the Bridgeport properties (by being closer to the Bridgeport properties).
It appears that some of the shadows impacts on the surrounding lands are generated by the	As noted herein, portions of properties impacted by the parking garage are already impacted by

proposed 6-storey parking garage. It was noted at the January 16, 2023 Informal Public Meeting that underground parking cannot be accommodated due to contamination. Staff are aware that a Record of Site Condition was filed for 115 Bridgeport Road East and a Certificate of Property Use (CPU) was issued by the Ministry of the Environment, Conservation and Parks. In reviewing the CPU, it appears that an underground parking structure is permitted on the property with appropriate ventilation and construction measures. Given the shadow issues, the applicant is asked to explore accommodating one level of parking underground. Alternatively, the applicant could consider relocating some of the parking to level 5 within the podium.	shadows caused by mature vegetation within those lots. It is also noted that these properties are zoned RMU-20 and are expected to transition over time from single detached to multiple residential development.
---	--

Zoning Relief Required from Tower Regulations:

Within Zoning By-law 2018-050 there are several regulations relating to tower design. The proposed development meets or in some cases exceeds minimum requirements for almost all regulations that would apply to within the requested C1-81 and RMU-81 zoning categories.

The following provides a brief overview of how the proposal responds to tower related regulations:

Regulation	Required	Provided
Building Height (maximum)	81 metres and 25 storeys (C1-81 and RMU-81) 20 metres and 6 storeys (RMU-20)	Tower A – 35 storeys, 115 m Tower B – 24 storeys, 79 m Tower C – 19 storeys, 63 m Parking Structure – 25 m and 8 storeys It is noted that two of the proposed towers are below the permitted tower height of the proposed C1-81 and RMU-81 zones. Additional height has been added to Tower A which is sufficiently separated from any existing low-rise residential development. Varying heights result in a more attractive development and a more interesting skyline.

Regulation	Required	Provided
		The parking structure exceeds the permitted height by two storeys and 5 metres. In our opinion eight storeys is an appropriate height. This opinion considers that the abutting Bridgeport properties are permitted to be developed at a height of six storeys and that the minimum setbacks to the adjacent R1 zone are exceeded by 4.1 metres. There are no shadow impacts from the parking garage on the low rise properties along the south side of Royal Street.
Podium Height (maximum)	21 metres	21 metres; Parking structure portion of the podium -25 metres
Tower Separation (minimum)	22 metres from a tower on the same lot; and/or 11 metres from an interior lot line Combined 22 metres from internal side lot line, provided a minimum of 6 metres is provided on one side	Tower A to Tower B: 20.5 m Tower A to Tower C: 20.1 m Tower B to Tower C: 18.9 m Tower B to Interior Lot Line: 16.8 m Tower C to Interior Lot Line: ± 18 m While site specific regulations are required for the separation between towers on the same lot; careful consideration has been given to the overall tower placement and setbacks on site. In our opinion it is appropriate to place towers closer together on site in order to increase the tower separation to interior lot lines. The proposed development exceeds the setback to interior lot lines by 5.8 metres (Tower B) and 7 metres (Tower C) respectively. In addition separation measured on the site plan does not apply to the entire building face- the separation does vary with the

Regulation	Required	Provided
		most restrictive measurement confirmed herein.
Horizontal Tower Dimension (maximum)	40 metres	Tower A: 44 m Tower B: 40 m Tower C: 40 m A site specific regulation is requested to the maximum tower dimension for Tower A (up to the 27 th storey). Above the 27 th storey there is a setback on the south side of the tower, and the remaining floors (28 -35) meet the 40 metre tower dimension. The modest increase in tower width does not negatively impact surrounding low rise residential properties. Further, despite the increased tower width, no relief is required from the maximum permitted tower footprint.
Tower Footprint (maximum)	1,000 square metres	Tower A = 908.2 m ² Tower B = 813 m ² Tower C = 813 m ² All three towers fall within the maximum permitted tower footprint (including Tower A which has a slightly longer tower length).
Tower Stepback above Podium (including front building façade and flankage building façade) (minimum)	3 metres	All towers = 3.0 m
Amenity Area	3 square metres for the first bedrooms and 2 square metres for each additional bedroom in the dwelling unit (2,734 m ²)	Indoor Amenity: - Ground Floor: 435.8 m² - Level 2: 518 m² - Level 5: 215.9 m² - Level 6: 215.9 m² Balconies: 3,896 m ² Total: 5,254.7 m ² Provided amenity area exceeds zoning requirements by 2,520.7 square metres.

In summary, for the C1-81 and RMU-81 zoning that is being sought, the proposed development exceeds tower separation from abutting properties. The two towers closest to existing residential development fall below RMU-81 height permissions. All three towers are within the maximum

permitted tower footprint. Amenity area requirements are exceeded by more than 2,500 square metres.

MHBC Design Brief (2022) Vision, Goals and Objectives:

The 2022 Design Brief set out a vision for the site of a high quality, contemporary mixed-use development which will establish a high quality of design that is compatible with the planned built form in the area and positively contributes to the streetscapes of Bridgeport Road, Weber Street and Royal Street. This vision was supported by the following Goals and Objectives:

1. Achieving a compact urban form and promoting intensification suitable for the area;
2. Providing a mix of unit types to accommodate a range of users;
3. Providing commercial space consistent with the emerging commercial mixed-use character of the node;
4. Achieving a high quality design through massing, orientation, material selections, pedestrian orientations, architectural treatments, and streetscape elements that align with good urban design principles;
5. Providing consideration for compatibility of scale and built form with existing and planned development in the area;
6. Providing a transit and active transportation supportive development; and
7. Providing sustainable design of the site and building features.

In my opinion the revised concept continues to support the original vision and the goals and objectives set out in the 2022 Design Brief. It is further my opinion that the proposed development has appropriately considered design policies of the City's Official Plan and the applicable guidelines of the City's Urban Design Manual.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read 'Andrea Sinclair', with a long horizontal stroke extending to the right.

Andrea Sinclair, MUDS, BES, MCIP, RPP