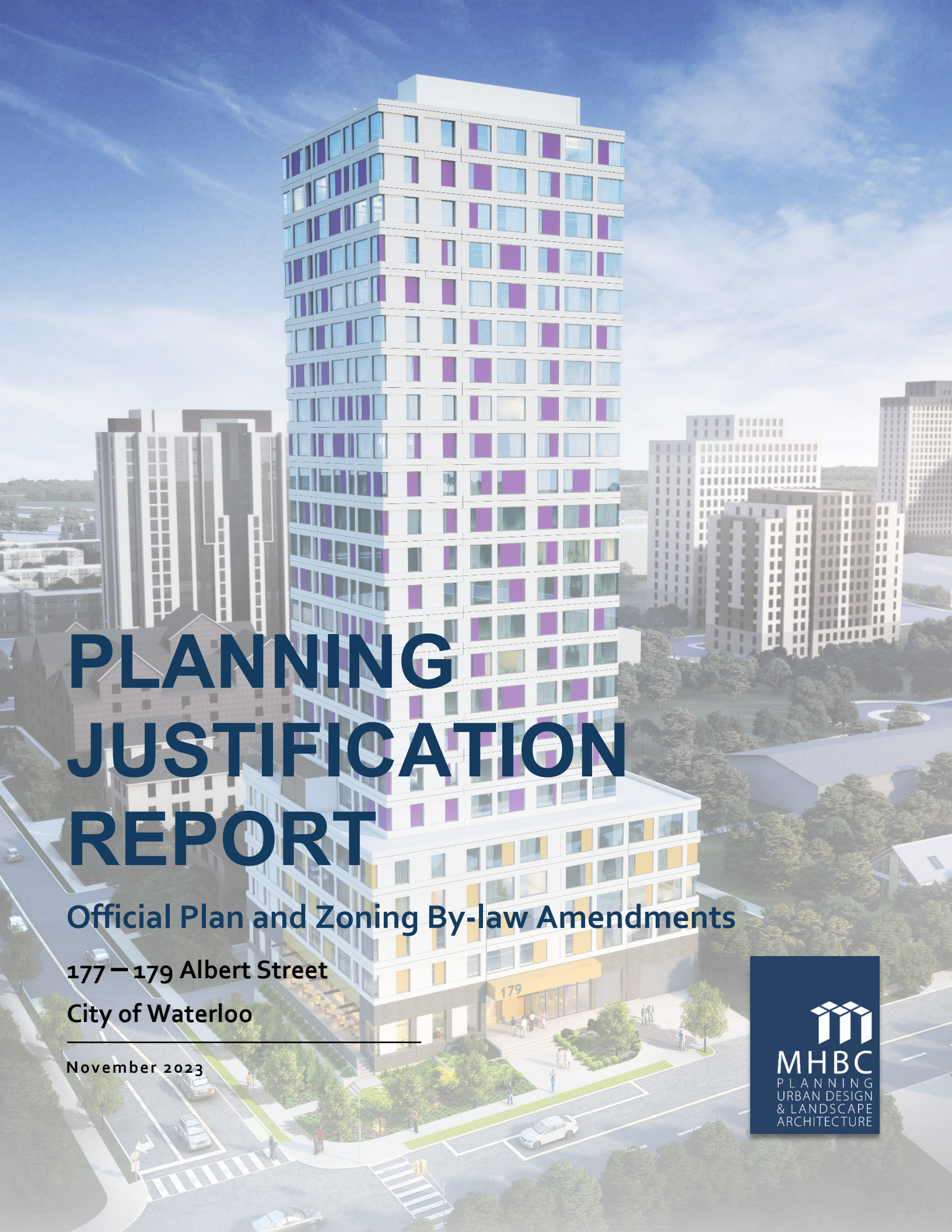


PLANNING JUSTIFICATION REPORT

Official Plan and Zoning By-law Amendments

177 – 179 Albert Street

City of Waterloo

November 2023

MHBC
PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

PLANNING JUSTIFICATION REPORT

177 – 179 Albert Street

City of Waterloo

Prepared For: 14688210 Canada Inc.

Date: November 2023

Prepared By:

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC)

540 Bingemans Centre Drive, Suite 200

Kitchener, Ontario

T: (519) 576-3650 F: (519) 576- 0121

MHBC File: 15200F

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1.0 Introduction

MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") has been retained by 14688210 Canada Inc. (the "Owner") to provide a planning advice in connection with applications for an Official Plan and Zoning By-law Amendment for lands municipally addressed as 177-179 Albert Street ("the subject lands"). The purpose of this Planning Justification Report is to provide a planning summary and analysis of the relevant policy framework, planning considerations, and technical studies required to permit a high-rise residential development on the subject lands.

The subject lands comprise a total of 0.1617 hectares and are located on the northwest corner of Albert Street and Seagram Drive. The lands are currently developed with two existing detached low-rise buildings. The owner proposes to redevelop the lands by demolishing the existing buildings and replacing them with a new residential building with a podium/tower built form. The proposed development is proposed to:

- Have a height of 24 storeys (75.24 metres);
- 146 units (172 bedrooms), equating to a density of 1,064 bedrooms per hectare;
- 44 parking spaces (18 surface, 26 underground);
- Building amenities, including a Fitness Room oriented to Seagram Drive, on the ground floor;
- Landscaped areas facing Albert Street and Seagram Drive; and,
- Two vehicular entrances (one from Albert Street and one from Seagram Drive).

This Report has been prepared in support of Official Plan and Zoning By-law Amendment applications to permit the development of the subject lands as described above. This Report provides justification for the applications and addresses relevant planning policies and regulations applicable to the subject lands.

The proposed Official Plan Amendment and Zoning By-law Amendment represents good land use planning, is consistent with the Provincial Policy Statement, conform to the Growth Plan for the Greater Golden Horseshoe, and meet the intent of the Official Plan. MHBC Planning accordingly recommends approval of these amendments.

1.1 Pre-Submission Consultation

A Pre-consultation Meeting was held with municipal staff on March 2, 2022 to discuss the proposed development. Further meetings with the City were additionally held to discuss the proposed development, obtain additional feedback, and to discuss the overall development concept for the subject lands. City staff identified the following requirements for complete Official Plan and Zoning By-law Amendment applications:

- Completed Application Form, Permission to Enter Form, Owner Authorization Form and Application fees;
- Notice of Source Protection Plan Compliance;
- Existing Conditions Plan;
- Site Plan;
- Floorplans and Building Elevations;
- Renderings;
- Cross-sections;
- Grading Plan;
- Servicing Plan;
- Planning Justification Report;
- Parking Study;
- Energy Strategy;
- Traffic Impact Study;
- Urban Design Report;
- Wind Study;
- Shadow Study;
- Functional Servicing and Grading Design Report;
- Stormwater Management Report;
- Geotechnical Report;
- Hydrogeological Report;
- Stationary Noise Study with Consultant Statutory Declaration; and,
- Environmental Noise Study with Consultant Statutory Declaration.

The required plans and reports / studies listed above have been completed and are included as part of this submission. A brief summary of the technical reports is included in Section 5 of this Report.

2.0 Context

2.1 Site Location and Description

The subject lands are comprised of two lots and are municipally addressed as 177-179 Albert Street. The lands are located at the northwest corner of the intersection of Albert Street and Seagram Drive (**Figure 1**) and are 0.162 hectares in size with approximately 40 metres of frontage on Albert Street and 40 metres of frontage on Seagram Drive.

The subject lands are currently developed with two detached dwellings, as shown in **Figure 2**. The lands are accessed from both Seagram Drive (177 Albert Street) and Albert Street (179 Albert Street). The lands contain existing vegetation including between the two properties.

Figure 2 – Existing Development





Figure 1
Location Map

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

Source: Region of Waterloo 2022 Satellite Imagery

Date:	November 2023
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north

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2.2 Surrounding Uses

The lands are generally surrounded by institutional uses, including Wilfrid Laurier University's main campus on the east side of Albert Street directly across from the subject lands, and residential uses, including high-rise buildings geared towards students located to the north and west (**Figure 3**). The Albert-McGregor Heritage Conservation District is located further to the south. Surrounding uses are generally described below:

NORTH: Immediately to the north of the subject lands are vacant lands with a pedestrian pathway that connects from Albert Street to lands owned and operated by Laurier to the west along Sunview Street. Further to the north are mid-rise and high-rise buildings, with the Northdale neighbourhood located approximately 200 metres to the north.

EAST: To the east of the subject lands is Wilfrid Laurier University, which includes multiple buildings forming their main campus. A signalized pedestrian crossing provides access from the subject lands to the campus, generally at the intersection of Seagram Drive and Albert Street.

SOUTH: To the south are low-rise buildings along Seagram Drive (planned for high density uses). The University's Seagram Stadium, KW Granite Club, and Rotary Club of Waterloo are along the south side of Seagram Drive, as is Waterloo Park. Further to the south is the Albert-MacGregor Heritage Conservation District.

WEST: To the west are lands and buildings owned by Laurier that are accessed from Sunview Street. Further to the west is the University of Waterloo, including multiple student residence buildings. Waterloo Park and the ION Station are also located to the west (approximately 500 metres), on the south side of Seagram Drive.

Sidewalks and bicycle lanes are provided on both sides of Albert Street and Seagram Drive. Seagram Drive also contains multi-use pathways leading to the ION Station.

In summary, the subject lands are located in close proximity to both Wilfrid Laurier University and the University of Waterloo, Waterloo Park, the ION Station in the Park and in an area that

contains multiple mid- and high-rise apartment buildings and student residences. Commercial uses are located within walking distance to the north along University Avenue, while the City's core along King Street is less than 750 metres to the southeast.

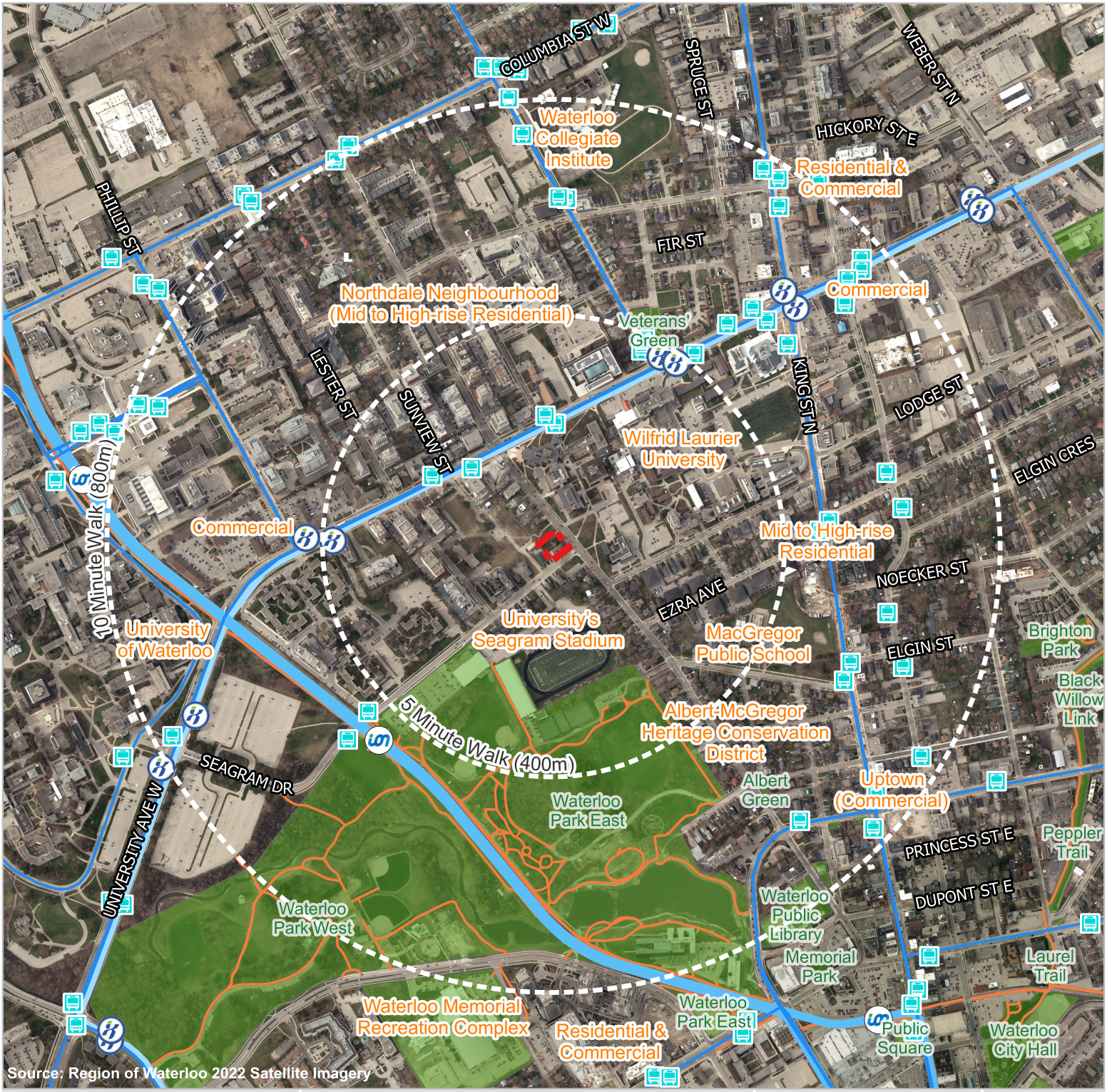


Figure 3
Surrounding Uses

177-179 Albert St
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands
- Walking Distances (400m, 800m)
- ION_Stops
- iXpress Stops
- GRT_Stops
- ION Route
- iXpress Route
- GRT Transit Route
- Trails
- Parks

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north

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3.0 Proposal

3.1 Proposed Development

The owner is proposing to demolish the existing buildings on the subject lands and develop a new high-rise building with ground floor amenity uses and residential units above, as described below.

Built Form

The building includes a five storey podium with a 19 storey tower above (24 storeys total) as shown in **Figures 4** and **5**. The tower is located centrally on the podium and is setback from both streets and the adjacent properties to the north and west.

The ground floor includes a large lobby and management office oriented to Albert Street, and a significant fitness room oriented to the corner and along the Seagram Drive frontage (site plan and floor plans are provided with this submission). A large indoor bicycle parking area is also proposed along Seagram Drive, purposely located close to the street to allow for easy access from cycling lanes directly into the building. Covered parking and loading is located behind other uses to shield them from view of the street. A patio space facing Seagram Drive is also proposed as an informal spill out area associated with the large fitness room. No residential units are proposed on the ground floor.

In addition to the ground floor amenity areas, a lounge and rooftop patio are proposed on the sixth floor, with the rooftop patio located on top of the five storey podium below.

Landscaping is proposed along both street frontages, as shown in **Figures 6** and **7**.

Residential Units and Building Entrances

A total of 146 units are proposed (120 one bedroom units and 26 two bedroom units), with a total 172 bedrooms.

The principal building entrance is oriented to Albert Street and is framed by an overhead canopy, with substantial areas along the entire Albert Street frontage for soft and hard landscaping. A secondary pedestrian entrance is provided from the patio oriented to Seagram Drive. Both entrances have direct connections to the public sidewalks. As noted earlier, a direct entrance to the bicycle parking area is also provided from Seagram Drive to encourage the use of cycling.

Figure 4: Ground Floor Plan

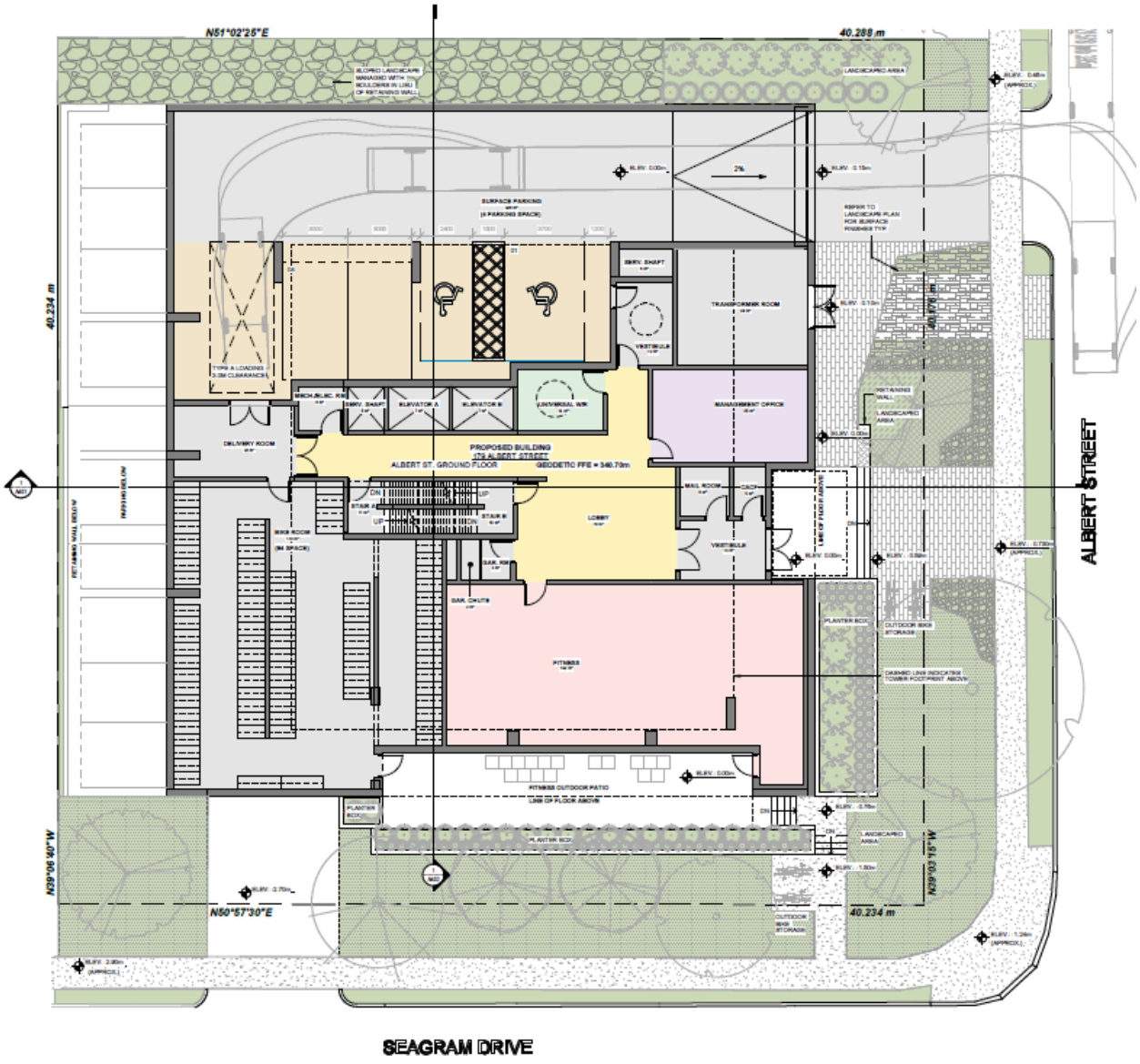


Figure 5: Rendering of Proposed Development



Figure 6: Ground Floor Conceptual Landscape Plan

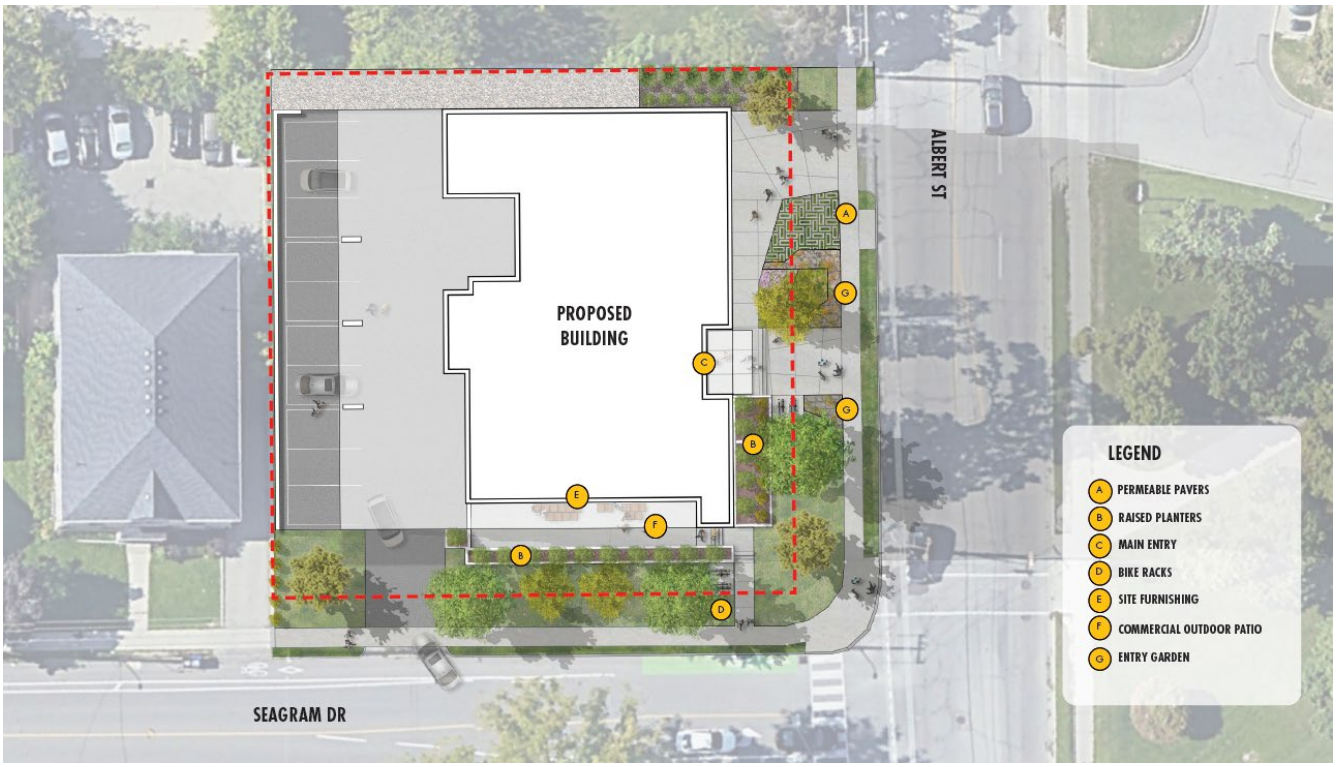
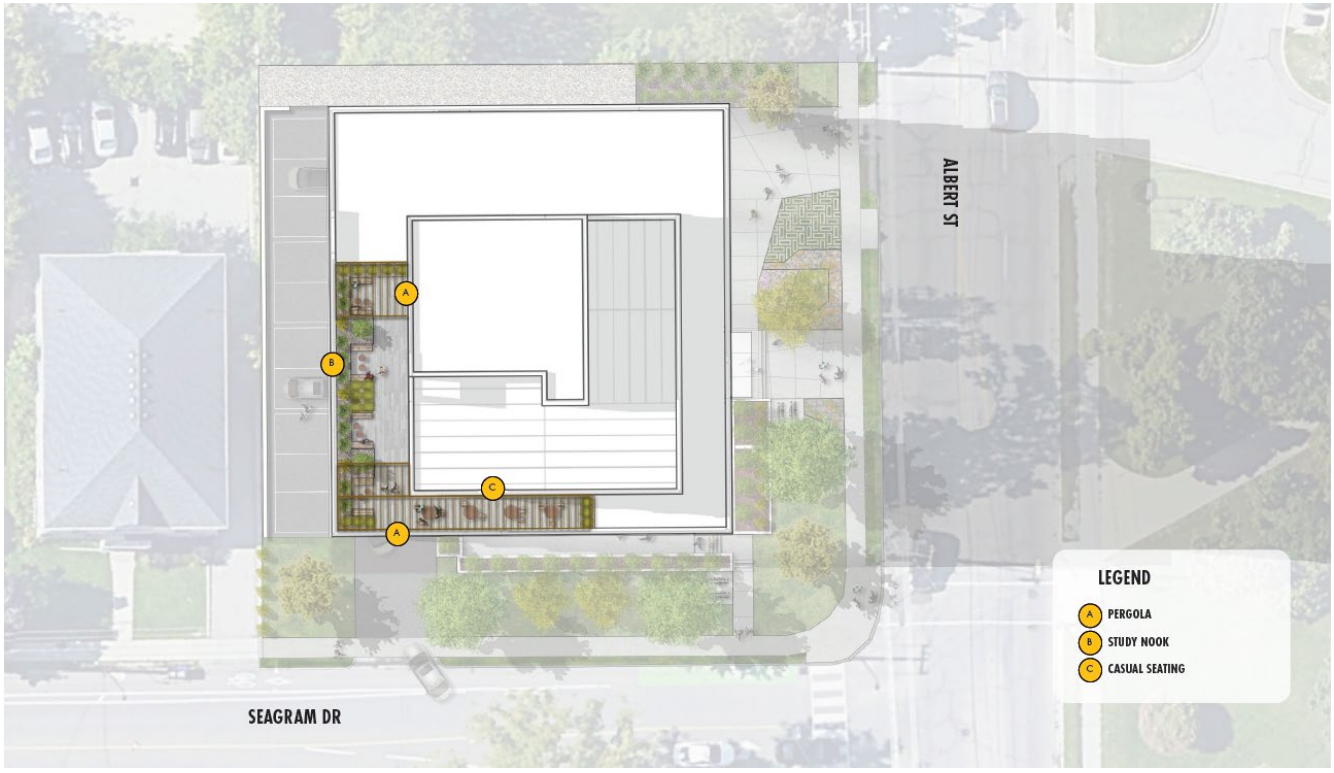


Figure 7 – Rooftop Amenity Conceptual Landscape Plan



Parking and Access

Two driveways are proposed for the site, due to the significant grade change between Albert Street and the west side of the subject lands. The driveway from Albert Street leads to 4 parking spaces and the loading space. These spaces are intended for visitors and short term deliveries as well as for those moving into the building. Barrier free spaces are also located in this area to provide easy access to the building's elevators.

The driveway access from Seagram Drive is located one full storey lower than the grade along Albert Street and leads to the majority of the development's parking, which is located within a two level parking structure either partially or completed below grade.

The total supply of parking is noted below in Table 1:

Table 1: Supply of Parking by Level

Floor	Spaces Provided
B2 (Basement)	26
B1 (Partially at Grade)	14
Ground Floor	4 (including two accessible)
Total	44

As discussed earlier, an indoor bicycle parking room (Type A) is provided on the ground floor and includes 75 spaces. An additional 13 outdoor bicycle parking spaces (Type B) are proposed nearest the main entry facing Albert Street and nearest the Seagram Drive entrance, west of the driveway. In total 88 bicycle parking spaces are proposed.

Development Summary

- A total of 146 units are proposed (172 bedrooms) within a 24 storey building, composed of a 5 storey podium and a 19 storey tower. In support of the proposal, the following parking is provided:
- 0.23 spaces per residential unit (35 spaces)
- 0.06 visitor parking spaces per residential unit (9 spaces); and
- 0.59 bicycle parking spaces (87 spaces).

3.2 Applications

This section provides an overview of the proposed Zoning By-law Amendment and future planning application(s) required to facilitate the proposed redevelopment.

3.2.1 Official Plan Amendment

The subject lands are designated *Mixed-use High Density Residential* and *Academic* (Specific Provision Area 20), which permits multiple residential buildings with a height of 81 metres and a maximum density of 750 bedrooms per hectare. An Official Plan Amendment is required to

permit a maximum density of 1,064 bedrooms per hectare (1,150 bedrooms per hectare if a road widening is conveyed along Seagram Drive), which represents an additional 51 bedrooms.

The requested amendment is discussed in Section 4.5 of this Report.

3.2.2 Zoning By-law Amendment

The subject lands are zoned *Residential Mixed-Use 81 (RMU-81)* with site-specific exception 179 in Zoning By-law 2018-050. The RMU-81 zone permits multi-unit residential buildings with a maximum height of 81 storeys and a maximum density of 750 bedrooms per hectare. Site-specific exception 179 permits university and college uses.

No change in the zone is proposed. However, in order to permit the development and in recognition of its location, a Zoning By-law Amendment is required to permit the following site-specific exceptions:

- Permit an increase in the maximum permitted density from 750 to 1,064 bedrooms per hectare (1,150 bedrooms per hectare after the road widening, if required);
- Permit a reduction in the minimum required landscaped open space from 30% to 24%;
- Permit a reduction in the minimum required tower separation from the northerly internal lot line from 11 metres to 9.5 metres and to 10.8 metres from the westerly internal lot line; and,
- Permit a site specific residential parking rate of 0.2 spaces per bedroom for residents and 0.05 spaces per bedroom for visitors.

The requested amendments are discussed in Section 4.7 of this Report.

4.0 Planning Analysis

The following is a review of the applicable land use policy framework for the subject lands, and how the proposal has met or will meet policy considerations.

4.1 Planning Act

Section 2 of the *Planning Act* identifies the matters of Provincial interest that are to be considered with respect to planning applications. The following considers the matters of Provincial interest with respect to the proposed development and facilitating amendments:

Table 2: Matters of Provincial Interest

Matter of Provincial Interest (Section 2)	Application to Proposed Development
Subsection 2(a) The protection of ecological systems, including natural areas, features and functions	There are no natural features on the subject lands.
Subsection 2(b) The protection of the agricultural resources of the Province	The lands do not include agricultural resources.
Subsection 2(c) The conservation and management of natural resources and the mineral resource base	There are no natural or mineral resources on the subject lands.
Subsection 2(d) The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest	There are no features of significant architectural, cultural, historical, archaeological or scientific interest on the subject lands.
Subsection 2(e) The supply, efficient use and conservation of energy and water	The lands will utilize existing municipal infrastructure including existing municipal water services. The building will be constructed in accordance with the Building Code, which includes requirements for energy efficiency. Other measures to improve energy efficiency will be considered through more detailed design. Please refer to the Energy Strategy for more details.
Subsection 2(f) The adequate provision and efficient use of communication, transportation, sewage and	The proposed development will utilize existing municipal services and existing municipal roads. Waste will be collected in

Matter of Provincial Interest (Section 2)	Application to Proposed Development
water services and waste management systems	accordance with City requirements and best practices.
Subsection 2(g) The minimization of waste	Best management practices will be used to limit waste production during the demolition of the existing buildings.
Subsection 2(h) The orderly development of safe and healthy communities	The lands front on existing roads with existing services, active transportation infrastructure, and within walking distance of multiple transit routes, including the Laurier-Waterloo Park ION light rail station. The proposed development represents an appropriate built form within the sites' context.
Subsection 2(h.1) The accessibility for persons with disabilities to all facilities, services and matters to which this Act applies	Matters related to accessibility will be considered through the future site plan and building permit processes.
Subsection 2(i) The adequate provision and distribution of educational, health, social, cultural and recreational facilities	The lands are located in proximity to parks, community recreation, a wide range of commercial services, and transit routes. The development includes amenities for residents. Waterloo Park, the City's largest park is less than 500 metres to the west
Subsection 2(j) The adequate provision of a full range of housing, including affordable housing	The provision of additional rental housing geared to students will contribute towards rental housing in the City, which will positively impact the supply of rental housing more broadly. Recent presentations to City Council have highlighted the shortage of housing for students in the community.
Subsection 2(k) The adequate provision of employment opportunities	The proposed development is residential and does not include employment uses. Wilfrid Laurier University and the University of Waterloo, two of the City's largest employers, are within walking distance.

Matter of Provincial Interest (Section 2)	Application to Proposed Development
Subsection 2(l) The protection of the financial and economic well-being of the Province and its municipalities	The development will utilize existing infrastructure and community services, avoiding the need for the expansion or creation of new services. The future residents of the building will support transit, including GRT and ION, which represent significant investments by both the province and the Region.
Subsection 2(m) The co-ordination of planning activities of public bodies	The application was circulated to public agencies for comment and their comments will be considered through the approval process.
Subsection 2(n) The resolution of planning conflicts involving public and private interests	The subject lands represent compatible residential development within a *Major Corridor* and a *Major Transit Station Area*. The lands are already planned and zoned for high density residential uses.
Subsection 2(o) The protection of public health and safety	The subject lands are not subject to flooding and do not represent a threat to public health or safety.
Subsection 2(p) The appropriate location of growth and development	The subject lands are located within the *Built-Up Area* and more specifically, within a *Major Transit Station Area* and a *Major Corridor*, both of which are planned to accommodate a significant share of the City's future growth.
Subsection 2(q) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians	The development supports public transit as the development includes pedestrian connections to the public realm, including bicycle lanes on both street frontages. The subject lands are also proximate to an ION station.
Subsection 2(r) The promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant	The proposed development is well-designed with a unique façade that creates a sense of place. The ground floor includes a promenade and landscaping which are attractive, safe, and vibrant and positively contribute to the streetscape.

Matter of Provincial Interest (Section 2)	Application to Proposed Development
Subsection 2(s) The mitigation of greenhouse gas emissions and adaptation to a changing climate	The new building will be constructed in accordance with the energy efficiency requirements of the Building Code. Additional measures will be explored through more detailed design.

In summary, the proposed development considers the matters of Provincial Interest outlined in Section 2 of the Planning Act.

4.2 Provincial Policy Statement

The Provincial Policy Statement 2020 (PPS) came into effect on May 1, 2020 and provides a vision for land use planning in Ontario that encourages the efficient use of land, resources and public investment in infrastructure. A mix of land uses are encouraged to provide choice and diversity. A variety of transportation modes to facilitate pedestrian movement, less reliance on the automobile, and use of public transit is encouraged as a means of creating more sustainable, livable and healthy communities. The PPS encourages development that will provide for long-term prosperity, environmental health and social well-being.

The following is an analysis of the proposed development in the context of the policies of the PPS.

Section 1.0 – Building Strong and Healthy Communities

One of the key themes of the PPS is building strong, healthy communities and achieving efficient and resilient development patterns. Section 1.0 of the PPS addresses where development is directed, land use compatibility, employment, housing, public spaces (including parks), infrastructure, long-term economic prosperity, and climate change.

Section 1.1.1 of the PPS provides that healthy, liveable and safe communities are sustained by: promoting efficient development and land use patterns; accommodating an appropriate range and mix of uses and housing types; avoiding development which may cause environmental or public health and safety concerns; avoiding development and land use patterns that would prevent the efficient expansion of settlement areas; and, promoting cost effective development patterns to minimize land consumption and servicing costs. Section 1.1.3 directs development to settlement areas to efficiently use land, resources, infrastructure, and public service facilities while supporting active and public transportation and minimizing impacts to climate change. A range of uses and densities is promoted, including through redevelopment and intensification (Sections 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, and 1.1.3.5).

Section 1.4 of the PPS provides policy direction with respect to housing in Ontario. Section 1.4.3 of the PPS identifies that planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area. Section 1.4.3(b) further states that planning authorities are to permit

and facilitate all types of residential intensification and all housing options. Development of new housing is to be directed to locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs, densities for new housing which efficiently use land and support active transportation are to be promoted, and development standards for residential intensification are to minimize the cost of housing and promote compact form.

The subject lands are located within the *Built-up Area* of the City of Waterloo, an urban settlement area, and more specifically within a *Major Corridor* and a *Major Transit Station Area*, where intensification is planned for and encouraged at a density that supports transit use. The lands have excellent access to transit and active transportation, which will reduce the need for a personal vehicle. The development broadens the supply of housing within the City, and more particularly addresses a need for housing for students, as identified in the Student Accommodation Study. The subject lands are located adjacent to two existing roads, contain existing low-rise buildings and are already serviced with municipal services. The proposed development will intensify underutilized lands with a high-rise residential housing in a compact form that makes efficient use of the lands.

Section 1.6 of the PPS provides policy direction for infrastructure and establishes a servicing hierarchy where growth is to be accommodated with municipal sewage and water services within settlement areas, where available. Section 1.6.6.7 states that planning for stormwater management shall, among other matters, minimize erosion and changes in water balance; mitigate risks to human health, safety, property, and the environment; maximize the extent and function or vegetative and pervious surfaces; and promote stormwater management best practices.

Section 1.6.7.2 states that efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible. In accordance with Section 1.6.7.4, a land use pattern, density and mix of uses should be promoted that minimizes the length and number of vehicular trips and supports the current and future use of transit and active transportation.

As discussed earlier, the lands are already connected to municipal services, including water, sanitary and stormwater services. No new municipal infrastructure is required to accommodate the redevelopment of the lands.

Section 1.8, Energy Conservation, Air Quality and Climate Change, promotes energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions and provides direction on how these measures can be achieved. Through Section 1.8.1, the PPS supports:

- Development in a compact form,
- The promotion of active transportation;
- Transit supportive development and intensification to shorten commute journeys; and

- Design and orientation that maximizes energy efficiency and conservation.

The subject lands are located within a *Major Transit Station Area* and are well-connected to the surrounding active transportation network, including bicycle lanes on Albert Street and Seagram Drive. Furthermore, the design of the building will consider orientation and other mechanical/electrical measures with the objective of maximizing energy efficiency, as detailed in the Energy Strategy.

Section 2.0 – Wise Use and Management of Resources

Another key direction of the PPS is the wise use and management of resources including natural heritage, water, agriculture, minerals and petroleum, mineral aggregate resources, and cultural heritage and archaeology. In this regard, there are no natural heritage or cultural heritage features on or adjacent to the subject lands.

Section 3.0 – Protecting Public Health and Safety

The PPS directs development away from natural and human-made hazards to protect human health and safety. This includes directing development away from flood, erosion, and dynamic beach hazards as well as lands that are contaminated or affected by lands that have been previously used for resource extraction but have not yet been rehabilitated.

The subject lands are not located within a floodplain or other identified natural hazards.

Section 4.0 – Implementation and Interpretation

Section 4.1 states that the PPS applies to all decisions in respect of the exercise of any authority that affects a planning matter after May 1, 2020. In accordance with Section 4.6, the official plan is the most important vehicle for implementation of the PPS. In this regard, an evaluation of the City's Official Plan is considered in Section 4.3 of this Report.

In summary, the proposed Official Plan and Zoning By-law Amendments are consistent with the Provincial Policy Statement.

4.3 Growth Plan for the Greater Golden Horseshoe

The 2020 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan") came into effect on August 28, 2020. The Growth Plan establishes a vision for the Greater Golden Horseshoe based on the principles of: building compact, vibrant and complete communities; economic competitiveness; protecting natural heritage resources and employment areas; wise use of land and resources; optimizing infrastructure and transit and directing growth to and intensifying existing Built-up Areas. The *Planning Act* requires that decisions respecting planning matters conform to the Growth Plan.

Section 2.2.1 Managing Growth
The Growth Plan states that forecasted growth will be allocated based on the following:

a) The vast majority of growth will be directed to settlement areas that:
   i) have a delineated built boundary;
   ii) have existing or planned municipal and wastewater systems; and
   iii) can support the achievement of complete communities.
c) Within settlement areas, growth will be focused in:
   i) delineated built-up areas;
   ii) strategic growth areas;
   iii) locations with existing or planned transit, with a priority on higher order transit where it exists or is planned; and
   iv) areas with existing or planned public service facilities.

Section 2.2.1.4 of the Growth Plan states that applying the policies of the Growth Plan will support the achievement of complete communities that feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities. Complete communities are defined as:

"Places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. Complete communities are age-friendly and may take different shapes and forms appropriate to their contexts."

One of the areas where growth is to be focused is within *Major Transit Station Areas* as outlined in Section 2.2.4 of the Growth Plan. The Growth Plan established minimum density targets for development within *Major Transit Station Areas*, with a target of 95 persons and jobs per hectare for the Laurier-Waterloo Park Station (established in the Region's Official Plan) in recognition that Waterloo Park makes up a significant portion of the Station Area. The persons and jobs per hectare generated by the subject proposal is detailed in the following table:

Table 3: MTSA Density Targets

Land Use	Rate	Persons and/or Jobs
Residential Apartment	1.77 persons/unit	258
Population Related Employment	2.8%	7
Total		265
Lot Area (post widenings)		0.15 ha
Persons and Jobs Per Hectare		1,767

The density target in the Growth Plan and Regional Official Plan is a minimum and is measured across the entire Station Area. As noted above, Waterloo Park (where no development will occur) makes up a significant portion of the Station Area. As such, the development of other

sites within the Station Area at higher densities is critical for the planning objectives to be achieved.

Section 2.2.4 of the Growth Plan states that within all *Major Transit Station Areas*, development will be supported, where appropriate, by:

- Planning for a diverse mix of uses to support existing and planned transit service levels; and
- Providing alternative development standards, such as reduced parking standards.

Section 2.2.4 also states that lands adjacent to or near existing and planned frequent transit should be planned to be transit-supportive, supportive of active transportation and provide a range and mix of uses and activities. It is our opinion that the proposed mixed-use development is well situated to take advantage of and support active transportation options, and represents a transit-supportive development.

In conclusion, the subject lands are located in a *Major Transit Station Area* and *Major Corridor*, close to a range of commercial, major institutional, open space and residential uses, as well as an established network of public transit routes and active transportation facilities. The proposed development will add residential uses to the Station Area, which will contribute towards the principle of a complete community and will assist the City in achieving and exceeding the minimum Growth Plan and Regional Official Plan density targets.

In summary, the proposed Official Plan and Zoning By-law Amendment conforms to the Growth Plan for the Greater Golden Horseshoe.

4.4 Regional Official Plan

The Region of Waterloo adopted Official Plan Amendment 6 (ROPA 6) to update the Regional Official Plan (ROP) on August 18, 2022. ROPA 6 was approved by the Minister of Municipal Affairs and Housing on April 11, 2023.

Where and How to Grow

Development within *Urban Areas* is to be serviced with municipal water and wastewater, contribute to the creation of complete communities, protect the natural environment and culture heritage, be transit-oriented, and respect the scale and physical character of established neighbourhoods where reurbanization is to occur.

The ROP updates the Region's planning forecast to 2051 and implements the updated policies of the PPS, Growth Plan, and the Greenbelt Plan. Intensification continues to be the preferred approach for accommodating residents and jobs, with the City of Waterloo forecasted to grow to a population of 185,000 with 114,900 jobs by 2051.

The ROP includes delineated *Major Transit Station Areas* ("MTSA"), and identifies the subject lands as being within the *Wilfrid Laurier University and Waterloo Park MTSA*. *MTSA*s are lands located within 600 to 800 metres of a rapid transit station and are planned to accommodate mixed-use development at increased densities that support rapid transit service levels. The *Wilfrid Laurier University and Waterloo Park MTSA* has a minimum density target of 95 combined residents and jobs per hectare, as noted earlier, which is lower than other MTSAs due to Waterloo Park occupying a significant portion of the Station Area. Within *MTSA*s a diversity of uses at intensified densities is encouraged, as well as alternative development standards (such as reduced parking).

The application facilitates the intensification and redevelopment of a property within a *MTSA,* contributing to density target for the *Wilfrid Laurier University and Waterloo Park MTSA*. The subject property supports transit use through proximity to the light rail transit and bus rapid transit routes.

Liveability in Waterloo Region

The ROP supports a range and mix of housing, including a range of form, tenure, density, and affordability. Design that promotes walking and cycling is encouraged, as is Transportation Demand Management. Energy conservation is encouraged through the development of compact mixed-use development, reurbanization, local sourcing of materials, and other tools to reduce greenhouse gas generation and improve air quality. The enclosed Energy Strategy provides a detailed assessment of options to reduce greenhouse gas emissions.

The ROP supports mixed-use, compact growth that supports transit and active transportation, with the objective of creating 15-minute neighbourhoods. Such neighbourhoods are are identified as an objective, where mixed land uses provide the opportunity for residents to meet their daily needs for goods, services, and employment within a 15-minute trip through active transportation.

The updated ROP encourages a range and mix of housing and establishes an affordability target of 30% for new ownership and rental units.

The application provides a range of one and two bedroom units within a *MTSA* in conformity with the ROP's goals of providing a range of housing types in a form that reduces greenhouse gas generation. While the proposed development does not include affordable housing as defined by the Official Plan, it does provide units of varying sizes in a location that does not require car ownership to accommodate daily needs. The subject lands are well served by public transit and are connected to the surrounding active transportation network. We note in particular that the recent Student Accommodation Study indicated there was a shortage of housing for students attending the two universities and Conestoga College.

Conclusion: The Amendments conform to the Regional Official Plan

The proposed redevelopment intensifies a property within the *Built-Up Area*, and the Wilfrid Laurier University and Waterloo Park Major Transit Station Area, assisting with achieving the reurbanization and MTSA density targets in the ROP. Appropriate studies have been prepared and conclude that the proposed development can occur on full municipal services without negatively impacting the surrounding road network and noise mitigation measures will be implemented, where required, through detailed design and/or through appropriate warning clauses.

In summary, the proposed Official Plan and Zoning By-law Amendment conforms to the Region of Waterloo Official Plan.

4.5 City of Waterloo Official Plan

The City of Waterloo Official Plan represents the City's vision for growth and change within the community. The Official Plan 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 following outlines the applicable Schedules as contained in the Official Plan.

Table 4: City of Waterloo Schedules

Schedule	Designation
Schedule A: Land Use	Mixed-Use High Density Residential (please refer to **Figure 8**)
Schedule A6: Specific Provision Area	SPA 20 ("Lands around Wilfrid Laurier University"), 20I (please refer to **Figure 9**)
Schedule B: City Structure	Major Corridor (please refer to **Figure 10**)
Schedule B1: Height and Density	High Density, 81 metres (please refer to **Figure 11**)
Schedule E: Road Classification System	Major Collector (Albert Street) Minor Collector (Seagram Drive) (please refer to **Figure 12**)
Schedule F: Active Transportation System	Albert Street and Seagram Drive: Cycling Routes
Schedule J5: Waterloo Park Station Area	Area B (please refer to **Figure 13**).



Figure 8
City of Waterloo Official Plan Schedule A: Land Use

177-179 Albert St
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

Land Use Designations

- Low Density Residential
- Mixed-Use Medium Density Residential
- Mixed-Use Medium High Density Residential
- Mixed-Use High Density Residential
- Commercial
- Employment
- Major Institutional
- Open Space
- Rural
- Urban Area Boundary
- Uptown Waterloo Urban Growth Centre

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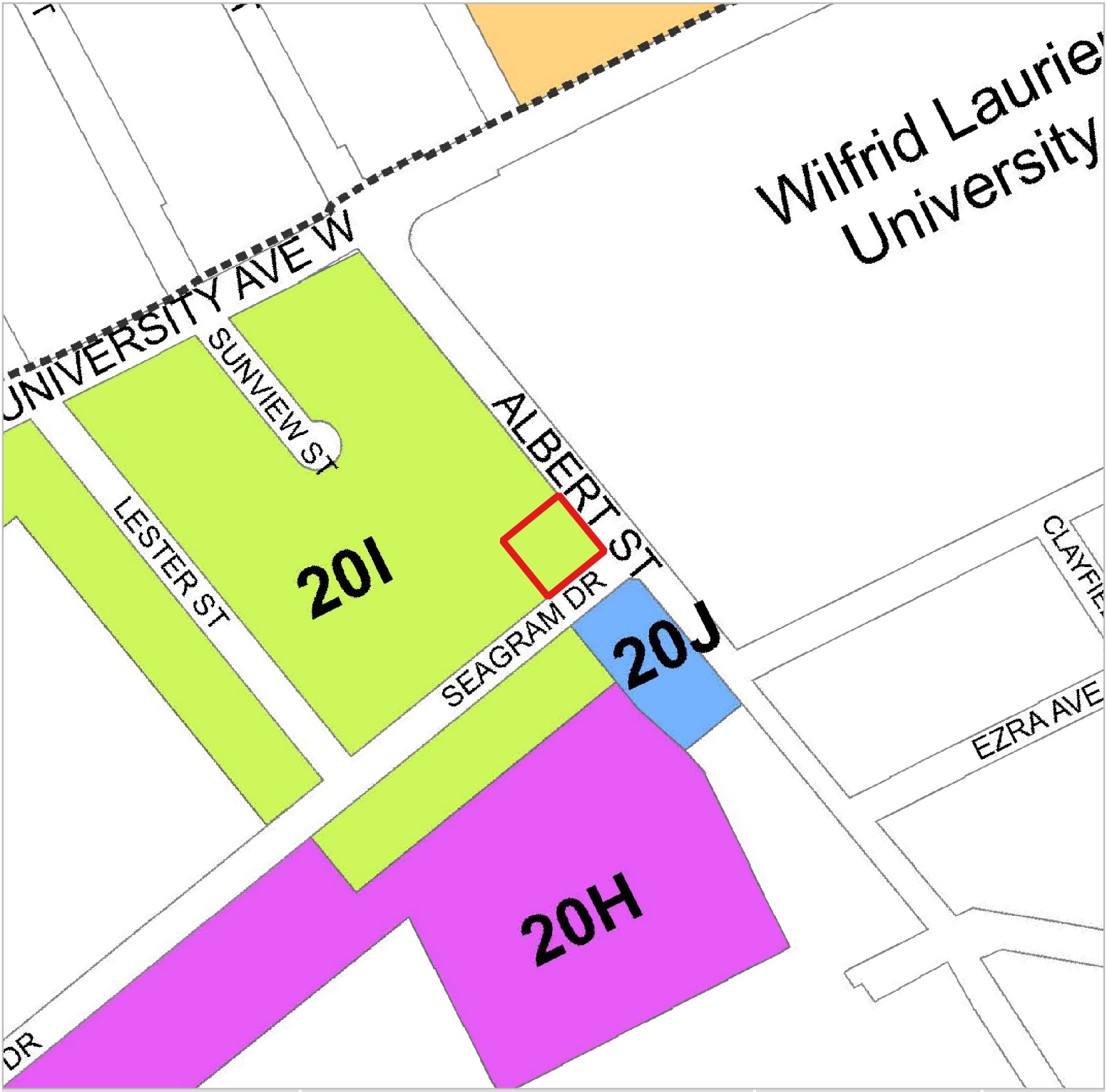


Figure 9
City of Waterloo Official Plan Schedule A6a: Specific Provision Areas 20

177-179 Albrt St.
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

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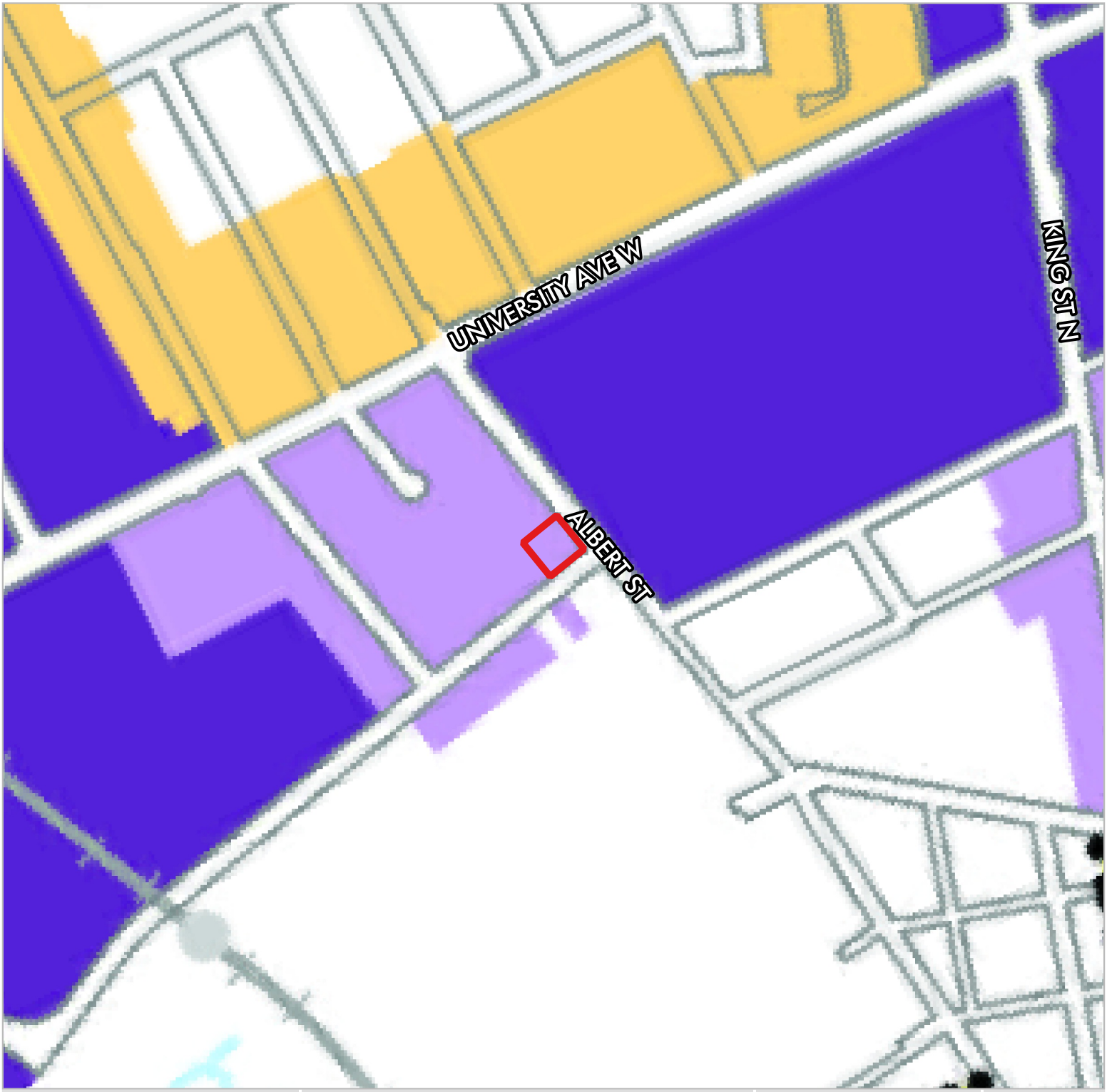


Figure 10
City of Waterloo Official Plan Schedule B: City Structure

LEGEND

- Subject Lands

Nodes and Corridors

- Primary Node
- Major Node
- Minor Node
- Future Node
- Major Corridor
- Minor Corridor

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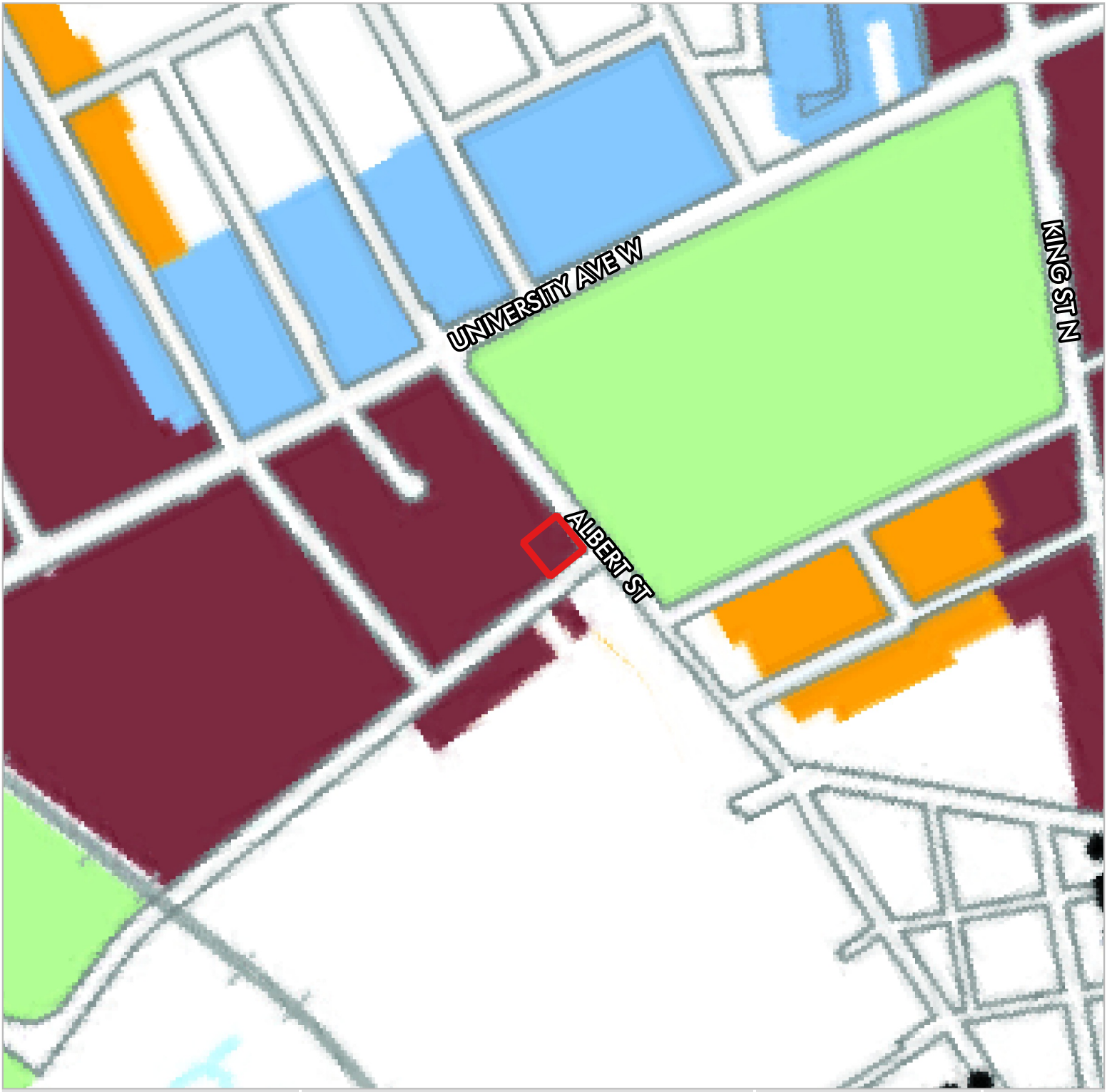


Figure 11
City of Waterloo Official Plan Schedule B1: Height and Density

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands
- Low Density, 10 metres (Northdale: Low Density, 6 storeys)
- Medium Density, 20 metres (Northdale: Medium Density, 8 storeys)
- Medium High Density, 40 metres (Northdale: Medium High Density, 12 storeys)
- High Density, 81 metres (Northdale: High Density, 25 storeys)
- Uptown Waterloo Urban Growth Centre
- Main Street, 6 metres to 16 metres
- Medium Density Employment, 27 metres
- Medium-High Density Employment, 40 metres
- High Density Employment, 81 metres

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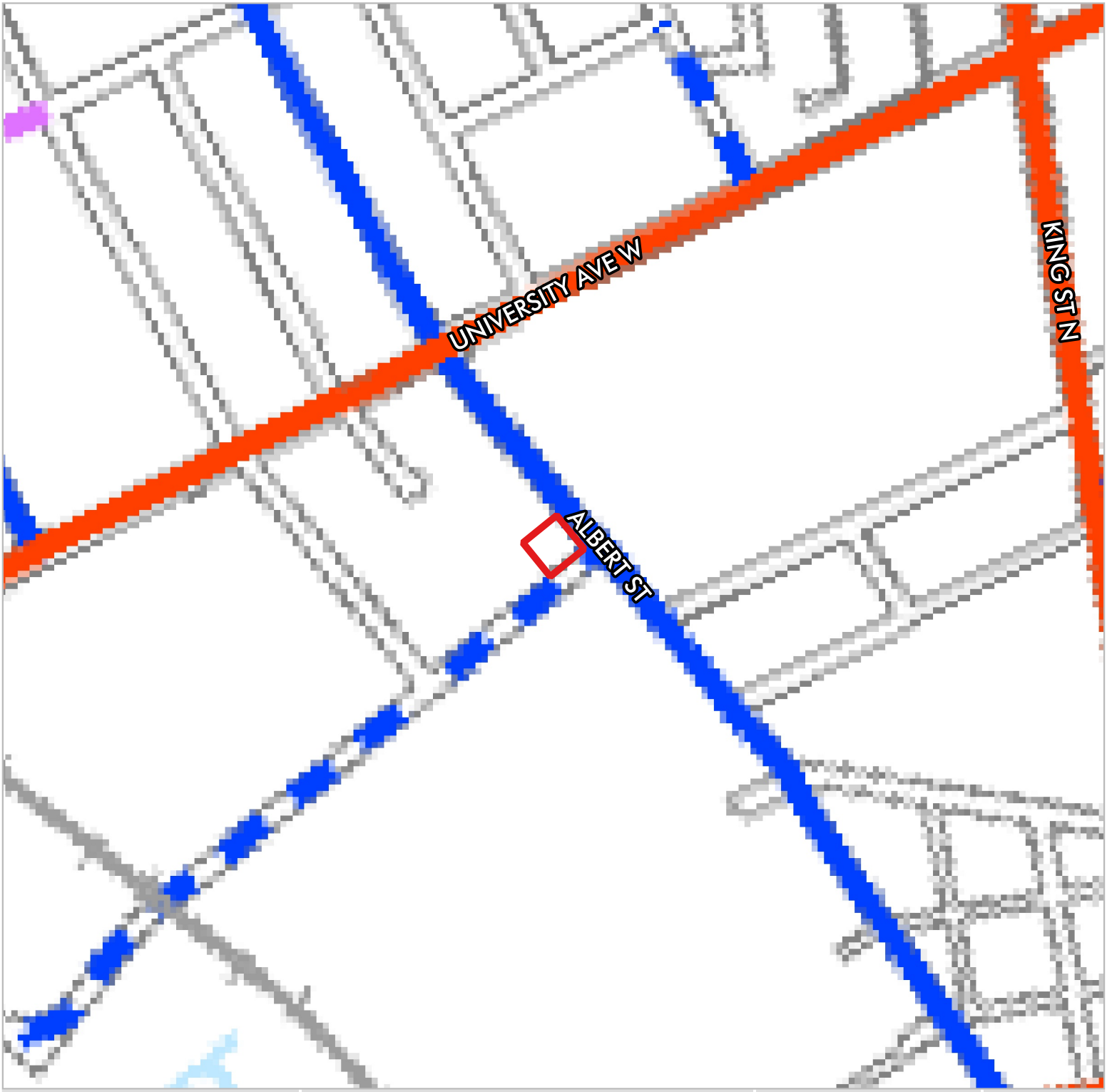


Figure 12
City of Waterloo Official Plan Schedule E: Road Classification System

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

Road Classification

Secondary Roads
- Local Roads
- Potential Future Local Roads
- Minor Collector
- Proposed Major Collector
- Major Collector
- Deferred

Primary Roads
- City Arterial
- Regional Arterial

Provincial Highway
- Provincial Highway

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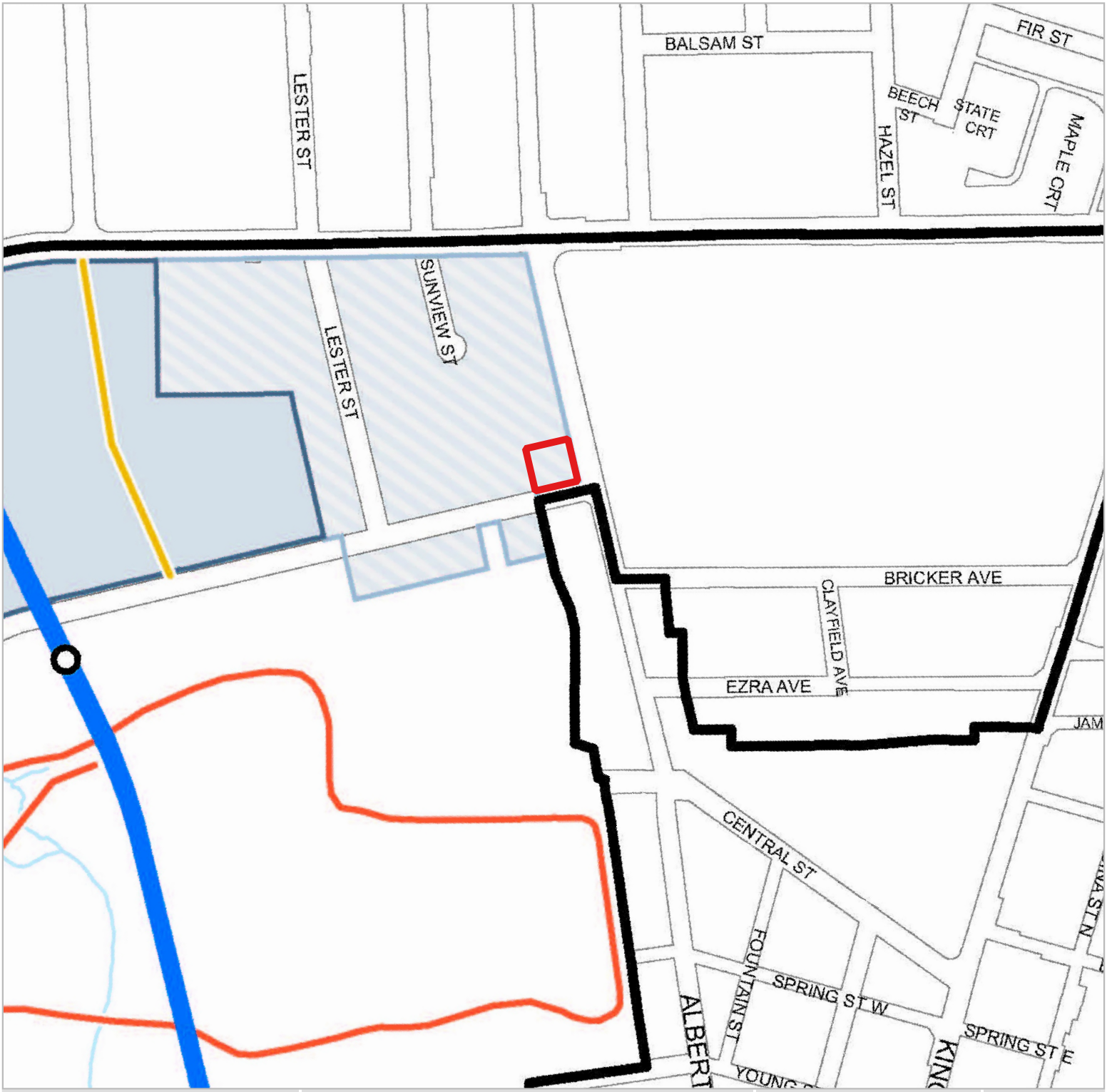


Figure 13
City of Waterloo Official Plan Schedule J5: Wilfird Laurier University and Waterloo Park Station Area

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands
- ION Rapid Transit Station
- Potential Priority Public Space
- ION LRT
- Active Transportation Connection
- Potential Priority Connection
- Station Area Boundary
- Area A
- Area B

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Nodes and Corridors will accommodate a full mix of uses and direction will be provided in this regard through the land use designations applied to the lands.

2. High Density, Medium-High Density and Medium Density land uses will be encouraged to locate in designated Nodes and Corridors and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses.
3. Construction of new low density uses will be discouraged within designated Nodes and Corridors. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter, with particular emphasis on section 3.8 for any development application, excluding applications for site plan approval, within Major Transit Station Areas.
4. Intensification of existing low density housing to higher density multiple residential buildings will be encouraged in designated Nodes and Corridors by the application of minimum densities on residential lands.
5. Lot consolidation shall be encouraged to provide properties of sufficient size that enable medium, medium-high and high density development. The Zoning By-Law may identify minimum lot sizes in designated Nodes and Corridors to ensure that an appropriate scale of development is achieved.
6. In addition to general urban design policies that apply city-wide, area- specific urban design policies for designated Nodes and Corridors shall also apply, as found in policy 3.11.2 of this chapter.
7. The City, in consultation with the Municipal Heritage Committee, encourages adaptive reuse of historically significant built resources, and requires the conservation of cultural heritage resources in all areas of the City, including designated Nodes and Corridors."

The proposed development intensifies existing low density buildings into higher density multiple residential housing in accordance with the *Major Corridor* policies. The two lots will be consolidated into a single, larger parcel for redevelopment

Parking within *Nodes* and *Corridors* is addressed in Section 3.6.6 of the Official Plan, which provides the following:

1. "Surface parking shall be minimized in favour of more intensive forms of parking. In conjunction with development, some surface parking is anticipated and shall be provided for visitor and drop-off uses. Street screening and screening from adjacent lands shall be undertaken for newly created surface parking.
2. Underground and structured parking is encouraged within Designated Nodes and Corridors.
3. Parking requirements will be defined in the Zoning By-Law and may include provisions for:
    a. Minimum and maximum amount of parking to be provided, including maximum limits on surface parking.

b. Reduced parking standards that may be permitted where sharing of parking facilities or areas is feasible, transit service is readily available and/or there is a demonstrated community benefit that supports a parking reduction.

c. Requirements for long-term and short-term bicycle parking."

Parking for the proposed development is located at the rear of the subject lands along the western property line, and all of the parking is provided either underground or within a structure. The development includes significant amounts of bicycle parking, both outside the building for visitors and within the building for residents. Further discussion regarding the supply of parking is included later in this Report and within the Parking Study prepared by Paradigm Transportation Solutions.

Specific Provision Area 20 (Lands Around Wilfrid Laurier University)

The subject lands are within *Area 20I* on Schedule A6a to the Official Plan. The policies for this Area are included in Section 11.1.20(11), which state that the lands are dually designated *Mixed-use High Density Residential* and *Academic*, provided that:

a) "University residential uses are permitted and shall have a minimum density of 150 bedrooms per hectare and a maximum density of 750 bedrooms per hectare; and,

b) Non-residential academic uses are permitted as ancillary uses on a property that contains high density residential or university residence as the primary use."

Although the lands are no longer owned by the University, it is clear the planned intent of the lands was for university residential uses. The proposed development is consistent with this objective, as the residential building proposes housing geared to students.

Mixed-Use High Density Residential and Academic Designations

The subject lands are designated *Mixed-use High Density Residential* and *Academic* (Specific Provision Area 20). The *Mixed-use High Density Residential* designation is intended to provide opportunities for substantial levels of intensification in *Major Nodes* and *Major Corridors*. In accordance with Section 10.1.6 of the Official Plan, multiple unit high density residential buildings are permitted with a maximum height of 81 metres and a maximum density of 750 bedrooms per hectare. The *Academic* designation permits academic facilities for post-secondary educational institutions, student residences, and other similar uses.

The proposed use and height are permitted, however an Official Plan Amendment is required to permit the proposed density, as discussed below. As the lands are no longer part of the Wilfrid Laurier University campus, the requested Official Plan Amendment will remove the lands from Specific Provision Area 20I and establish a new Specific Provision Area that permits increased density.

Proposed Official Plan Amendment

That Official Plan Amendment No. XX be adopted as follows:

1. That Schedule 'A6a' of the Official Plan of the City of Waterloo is hereby amended by removing 177 – 179 Albert Street from "Specific Provision Area 20".

2. That Schedule 'A6' of the Official Plan of the City of Waterloo is hereby amended by designating 177 – 179 Albert Street as "Specific Provision Area XX", as shown on **Figure 14** attached hereto.

3. That Section 11.1 of the Official Plan, Specific Provision Areas, be amended by adding the following Specific Provision Area:

   11.1.XX Specific Provision Area XX (177 – 179 Albert Street)

   1) The policies of this Specific Provision Area XX (SPA XX) apply to lands known municipally as 177 – 179 Albert Street, shown as SPA XX on Schedule 'A6' – Site Specific Provision Area.
   2) It shall be the policy of this Plan that the maximum density on the lands municipally addressed as 177-179 Albert Street shall be 1,150 bedrooms per hectare.

Planning Justification for Proposed Official Plan Amendment

In order to permit the proposed development, an increase in the maximum permitted density from 750 bedrooms per hectare to the requested 1,150 bedrooms per hectare (after road widening conveyance) is required.

The lands are ideally situated for a high density residential development geared towards students. Wilfred Laurier University is located across the street, and the University of Waterloo is within walking distance. The lands are additionally within walking distance of Uptown Waterloo and Waterloo Park, providing commercial and recreational uses for residents. The site is well served by public transit, with the Wilfrid Laurier University and Waterloo Park ION Station located approximately 500 metres west of the subject lands.

The lands are not constrained by the floodplain that traverses through the Uptown and are a significant distance from existing low-rise neighbourhoods. The Official Plan Amendment proposes an increase in density from 750 bedrooms per hectare to 1,150 bedrooms per hectare, representing an additional 51 bedrooms.

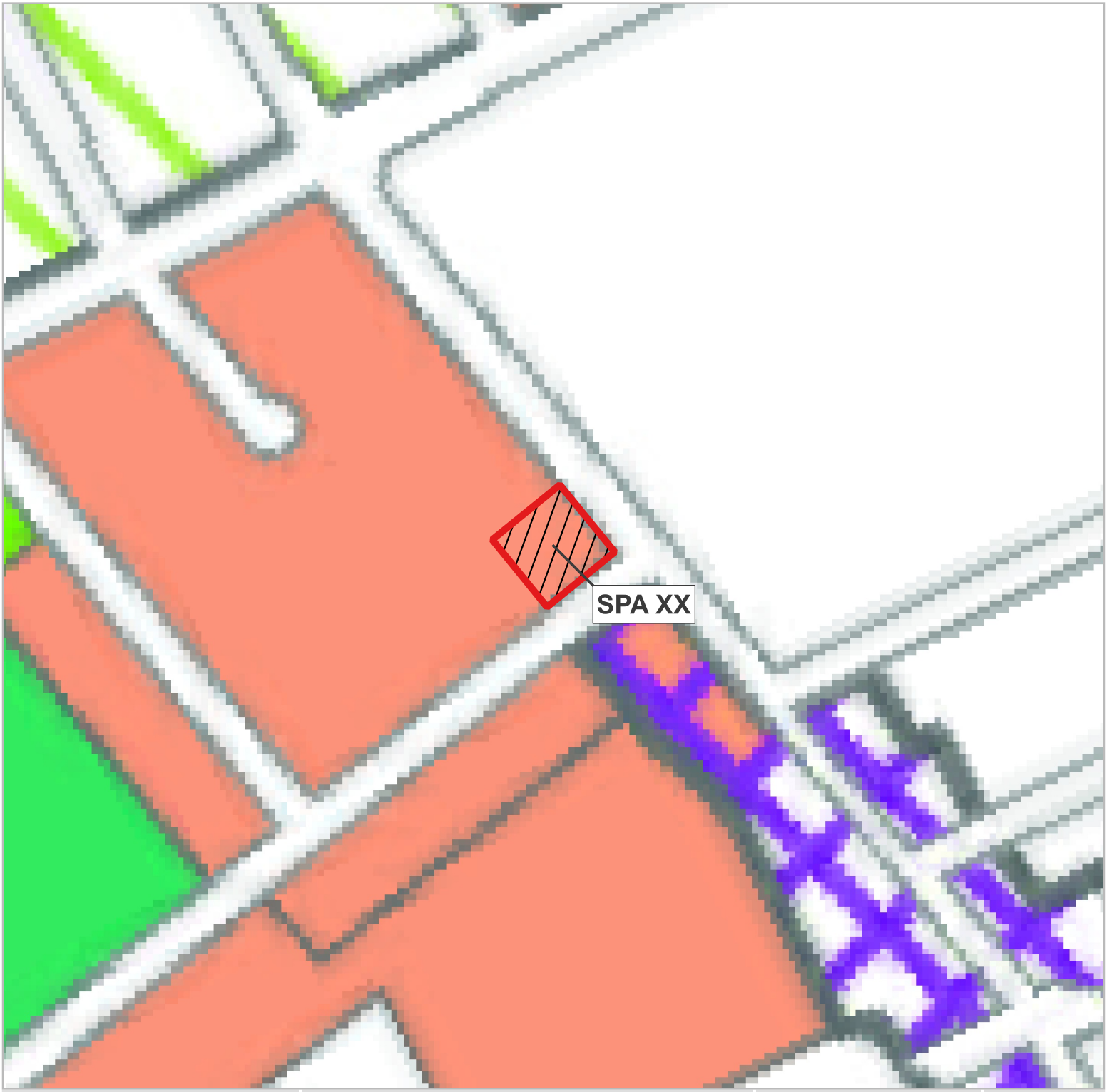


Figure 14
Proposed Official Plan Amendment

LEGEND

Subject Lands

Lands to be amended by adding the following Specific Provision Area:
- Maximum density: 1,150 bedrooms per hectare.

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It is important to note that no increase in height is proposed – the building is 75 metres in height, which is less than the permitted height in the Official Plan and Zoning Bylaw. The City's Official Plan does include policies regarding increases in height and/or density through 'bonusing.' The implementation of bonusing is through Section 37 of the Planning Act, was removed from the Planning Act, such that the former practice of approving increases in height and/or density through an agreement and the related provision of 'community benefits' was replaced with a more formal Community Benefits Charge Bylaw, which the City has since passed. Although the use of bonusing is no longer permitted by the Planning Act, the project has been evaluated using the same guiding policies to evaluate the appropriateness of the proposed increase in density.

Section 12.3.1 of the City's Official Plan includes policies regarding the use of Height and/or Density Bonusing. More specifically, bonusing applies to lands that:

- Are located within a designated *Node* or *Corridor*; and
- Are well serviced by existing or planned transit.

The subject lands satisfy both of the above criteria; they are located within a *Major Corridor* and are well served by both bus and rapid transit, including the Laurier-Waterloo Park Station proximate to the property.

Section 12.3.1(6) notes that "In all cases, appropriate development review processes will be utilized to ensure:

- The site is suitable for the proposed density and/or height in terms of parking, landscaping, and other site-specific requirements;
    - The proposed parking rate is appropriate for the lands and in particular, for a development geared to student located across the street from WLU's main campus and within a short walk of UW's main campus. The supply of parking is further supported by the Parking Study prepared by Paradigm Transportation and represents the same required supply of parking permitted in the Northdale neighbourhood 200 metres to the north and for a recent high-rise building located just north of the site on Albert Street;
    - Appropriate landscaping is provided, including along both street frontages, and the requested minor reduction will not impact the streetscape;
    - The podium and tower design is consistent with the City's urban design related Zoning regulations;
    - The requested site-specific amendments are appropriate as discussed in Section 4.7 of this Report.
- Any increase in density and/or height is compatible with the planned scale and character of the surrounding neighbourhood and has a minimal impact on neighbouring land uses; and

- The requested increase in density is accommodated without an increase in building height;
- The height and massing of the proposed development has been designed to be compatible with the surrounding neighbourhood, as discussed in the Urban Design Brief, Wind Study, and Shadow Study.
- There are multiple tall buildings in the area, including a new high rise building immediately to the north at the intersection of Albert Street and University Avenue.
- The building design includes a compact tower, situated on a podium, with sufficient separation from the street and adjacent properties.

- That community services, infrastructure and transportation impact issues are adequately addressed, if 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
  - A Transportation and Parking Study and Functional Servicing Report have been prepared to assess off-site impacts of the proposed development. They conclude that the proposal is appropriate and the increased density is supportable without producing off-site impacts.
  - The City's largest park (Waterloo Park) is a 4-5 minute walk from the building.
  - The Waterloo Memorial Recreation Complex is located on the south side of Waterloo Park, within walking/cycling distance of he subject lands.

In this regard, the proposed density can be accommodated on the subject lands utilizing the existing municipal infrastructure. The lands are ideally situated for a high density residential development and are located in an area that already contains other similar sized buildings, as well as lands planned for similar heights and densities.

In our opinion, the requested Amendment to the Official Plan to permit an increase in the number of bedrooms is appropriate for the subject lands.

4.6 Station Area Plan

The City of Waterloo approved a Station Area Plan for Laurier-Waterloo Park in June 2017. The Plan identifies the transformation of Seagram Drive into "an important gateway into Waterloo Park and Laurier" as one of six "Big Moves" and includes the land in the *Residential Mixed-use* area. This area permits medium-high to high density residential with at grade uses are permitted to improve amenity for local residents. Another objective of the Plan is to provide a range of housing, including options for families and seniors, within a variety of unit types and sizes.

The proposed development will contribute to the provision of a range and mix of housing types available in the City for all residents. However, as the development is geared towards students, it may also make existing housing that is currently occupied by students, such as buildings within the heritage district to the south, available for non-student households.

The proposed fitness room and corresponding patio facing Seagram Drive will assist with the Station Area Plan's objective of highlighting Seagram Drive as an important transportation corridor within the Area.

4.7 City of Waterloo Zoning By-law 2018-050

The lands are zoned *Residential Mixed-Use 81* (RMU-81) with Site-specific Exception C179 (see **Figure 15**). Exception C179 adds university / college and ancillary uses specified in Section 9.4.1.2 as permitted uses. The RMU-81 zone permits multi-unit residential buildings, including the proposed apartment building. No changes in permitted uses are proposed or required.

The following table includes the requirements in the RMU-81 zone. Where an amendment to the By-law is required, it is **bolded** within the table:

Table 5 – Review of RMU-81 Zoning Regulations

Regulation	Required (RMU-81)	Provided
Minimum Lot Frontage	20 m	40.176 m (Albert) 40.234 (Seagram)
Street Line Setback **Minimum**	5 m	5.08 (Albert) 5.05 (Seagram)* Note that if a road widening conveyance is required on Seagram Drive, the street line setback will be reduced accordingly, but the sidewalk would remain the same distance from the building and the hydro pole would also be more than 5 m from the building face
Maximum	At least 75% of the street line front building façade shall be within 6 m of the street line	100% @ 5.08 m (Albert) 100% @ 5.05 m (Seagram)
Minimum Side Yard Setback	3 m	3 m (north)
Minimum Rear Yard Setback	5 m	5.028 m (west)

Regulation	Required (RMU-81)	Provided
Minimum Low Rise Residential Lot Line Setback	7.5 m of half the height of the building, whichever is greater	Not applicable
Building Height **Minimum** **Maximum**	 13.5 m 81 m and 25 storeys	75.24 m
Density **Minimum** **Maximum**	 150 bedrooms per hectare 750 bedrooms per hectare = 121 bedrooms	**1,064 bedrooms per hectare (before widening) and 1,150 bedrooms per hectare (after estimated widening)** = 172 bedrooms (+51 bedrooms)
Minimum Landscaped Open Space	30% = 485 sq. m	**24.4%** = 394 sq. m
Maximum Number of Main Buildings per Lot	More than one permitted	One
Minimum Height of First Storey	4 m	5 m
Podium Height **Minimum** **Maximum**	 10.5 m 21 m and 6 storeys	18 m, 5 storeys
Tower Separation	11 m from an interior lot line	**9.5 m (north)** **10.8 m (west)**
Maximum Tower Horizontal Dimension	40 m	22.57 m (Albert) 20.57 (Seagram)
Maximum Tower Footprint	1,000 sq. m	463 sq. m
Minimum Tower Stepback above Podium on the Front and Flanking Facades	3 m	3.75 m (Albert) 3.050 m (Seagram)
Minimum Amenity Area	3 sq. m for the first bedroom and 2 sq. m for each additional bedroom in the dwelling unit = 490 sq. m	524.5 sq. m
Parking (Area A)		

Regulation	Required (RMU-81)	Provided
Residential	0.6 / unit = 88	**0.20 spaces per bedroom**
Visitor	0.1 / unit = 15	**0.05 spaces per bedroom**
Accessible Parking **Type A**	1 (with requested parking rate applied)	1
Type B	1 (with requested parking rate applied)	1
Bicycle Parking **Type A (Secure Indoor)**	0.3 / unit = 44	88
Type B (All Other)	0.3 / unit = 44	
Total	88	
Structured Parking	Minimum 25% of the first storey shall be comprised of common indoor amenity area, entrance / foyers, management offices, lobby, etc.	65% of the main floor is used for active uses
	For corner lots, building floor area specified above shall abut the entire front or entire flanking building facades	Complies – the ground floor facing Albert Street contains the permitted uses.



Figure 15
City of Waterloo Zoning By-law No. 2018-050

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands

Schedule A: Zoning Map

- Academic
- Residential
- Residential Mixed-Use
- Residential Northdale
- Open Space

Schedule C: Site Specific Zoning

- Exception C179

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Proposed Zoning By-law Amendment

1. That Zoning By-law 2018-050 is hereby amended by adding "CXXX" to Schedule 'C' of said By-law 2018-050 for the lands known municipally as "177 – 179 Albert Street" as shown on **Figure 16** attached hereto, as set out below:

Exception	**Address**	**Zoning**	**File Reference**
CXXX	177 – 179 Albert Street	RMU-81	OPA XX Z-23-XX

Location: 177 – 179 Albert Street
As shown on Schedule 'C1' to this By-law.

Site Specific Regulations:

a) Notwithstanding anything to the contrary, the following site-specific regulations shall apply:

i. DENSITY (maximum): 1,150 bedrooms per hectare.

ii. LANDSCAPED OPEN SPACE (minimum): 24%.

iii. TOWER separation (minimum): 9.5 metres from the north property line and 10.8 metres from the west property line.

iv. Residential PARKING SPACES (minimum): 0.20 per bedroom.

v. VISITOR PARKING SPACES (minimum): 0.05 per bedroom.

Planning Justification for Proposed Zoning By-law Amendment

A site-specific exception is required to facilitate the proposed development to:

- Permit a maximum density of 1,064 bedrooms per hectare (1,150 after road widening conveyance);
- Permit a reduced landscaped open space of 24%;
- Permit a reduced tower separation of 9.5 metres from the north property line and 10.8 metres from the west property line; and,
- Permit a site specific residential parking rate of 0.2 spaces per bedroom for residents and 0.05 spaces per bedroom for visitors.

The requested site-specific regulations are discussed in greater detail below.



Figure 16
Proposed Zoning By-law Amendment

177-179 Albert St.
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

Lands to be rezoned to "RMU-81" with the following site specific regulations;

i. DENSITY (maximum): 1,150 bedrooms per hectare.
ii. LANDSCAPED OPEN SPACE (minimum): 24%.
iii. TOWER separation (minimum): 9.5 metres from the north property line and 10.8 metres from the west property line.
iv. Residential PARKING SPACES (minimum): 0.20 per bedroom.
v. VISITOR PARKING SPACES (minimum): 0.05 per bedroom.

Date:	November 2023
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north

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Density

Density was discussed in Section 4.5 of this report.

The subject lands are ideally located to accommodate an increase in density. Three post-secondary campuses are accessible to the site, including Wilfrid Laurier University directly across the street. The lands are within a *Major Transit Station Area* and *Major Corridor* and are additionally served by active transportation options, including on-road bicycle lanes along Albert Street and Seagram Drive and the Laurel Trail through Waterloo Park and the University of Waterloo campus. The development is compatible with surrounding uses, which are primarily oriented towards post-secondary institutions (including lands within SPA 20 and lands that are zoned for university uses). The additional density provides an additional 51 bedrooms geared towards students, responding to the need for additional student housing identified in the Student Accommodations Study and permitted 26 two bedroom units.

Although the density in bedrooms per hectare is increasing, the massing of the building remains consistent with the podium/tower built form objectives of the Official Plan and the Zoning Bylaw. The height of the building is also below the maximum permitted in the Official Plan and the Zoning Bylaw. Off-site impacts of increased density such as traffic and parking, have been addressed in technical reports prepared as part of this submission. A Functional Servicing Report has additionally determined that adequate servicing is available to accommodate the proposed increase in density.

Landscaped Open Space

A minor reduction in landscaped open space equating to 91 square metres is requested to accommodate the proposed development. We note that the City recently modified the definition of Landscape Open space to exclude pathways that do not directly lead to green space.

Landscaping has been provided along both street frontages, creating an active and attractive pedestrian realm as shown in the Conceptual Landscape Plan (see Figure X). The slope of the site from Albert Street to the west and the need to accommodate parking beneath the building present challenges for locating landscaping along the west lot line.

We would note that if a road widening conveyance along Seagram Drive is required, the % calculation of landscape open space would be impacted, though the amount of landscaping between the building and curb would remain unchanged and the public realm components would also remain unchanged.

Tower Separation

The By-law requires a minimum 11 metre setback for a tower from an internal lot line which is intended to provide separation from adjacent properties, where towers already exist, or where towers may be developed in the future (where permitted).

In this case, the proposed tower footprint is very small, with a floor area of only 463 square metres. As such, its impact on any towers that may be developed in the future on lands to the north or west would be minimal, particularly when considering the very minor reductions in the setbacks.

Parking

A reduction in the residential and visitor parking rate is proposed to accommodate the proposed development. Paradigm Transportation Solutions has prepared a thorough Parking Study in support of the proposed supply of 0.25 spaces per bedroom. The Study notes that the proposed supply for the subject lands is the same as the Bylaw requirement for lands zoned 'Residential Northdale' located 200 m to the north and also for the development at the southwest corner of Albert Street and University, which is also zoned RMU-81.

As discussed, the proposed development is geared towards students, similar to some of the developments within the Northdale neighbourhood, and as such parking requirement of the RN zone are an appropriate comparison. Both the subject lands and some of the lands within the Northdale neighbourhood are located close to campus, well served by transit and are close to active transportation. In fact, the subject lands are located significantly closer to WLU than the majority of Northdale and are closer to UW than significant portions of Northdale. Furthermore, the subject lands have direct access to cycling lanes and multi-use pathways providing access to UW's campus (as well as the Laurel Trail) and a signalized pedestrian crossing adjacent to the subject lands provides direct access to Laurier's campus. Furthermore, the subject lands are located significantly closer to an ION station than the majority of the Northdale neigbourhood.

In this regard, the subject lands are at least equivalent to lands within Northdale, and in many instances, better situated with respect to proximity to the university campuses, active transportation and higher order transit.

Zoning By-law Amendment Summary

In summary:

- The proposed development accommodates increased density within a building within (below) the maximum height and in compliance with the majority of the tower regulations in the Bylaw;
- The additional density is appropriate for the lands, and provides much needed housing geared to students, in close proximity to the two university campuses, active transportation and ION;

- The proposed reduction in landscaped open space is minor and is requested due to grading challenges on the subject lands that limit landscaping opportunities along the west side of the site;
- The requested minor reduction in the tower separate setback will not impede development on adjacent lands; and,
- The proposed parking rates are supported by a Parking Study prepared by a transportation engineer and are equivalent to the rates required for lands within Northdale and immediately to the north, which exhibit many of the same location based characteristics as the subject lands.

Conclusion: Based on the foregoing, the proposed Zoning By-law Amendment and site-specific regulations are considered to be appropriate for the efficient redevelopment of the subject lands.

5.0 Technical Reports

5.1 Transportation Impact and Parking Study

A Transportation Impact Study and Parking Study was prepared by Paradigm Transportation Solutions Limited to assess transportation-related impacts of the proposed development and review the adequacy of the proposed parking supply.

The Study findings are:

- The Albert Street and Seagram Drive intersection will operate at an acceptable level of service and within capacity under existing, background, and future total traffic conditions;
- The proposed development is estimated to generate 32 new trips in the weekday AM peak hour and 29 new trips in the weekday PM peak hour;
- The proposed parking supply is compliant with the parking requirements for the Residential Northdale Twenty-Five (RN-25) Zone;
- The proposed parking supply is non-compliant with the Residential Mixed-Use (RMU-81) Zone, the Region's Parking Management Worksheet, ITE data, and 2016 Transportation Tomorrow Survey data;
- The proposed parking supply is consistent with City, Regional, and Provincial policy direction to support transit-oriented development and encourage the use of alternate modes of transportation through reduced parking requirements, and other measures to reduce single occupant vehicle travel.

The Study concludes that the proposed development is forecast to have a negligible impact on traffic operations at Albert Street and Seagram Drive and the proposed parking supply is adequate based on compliance with parking requirements for the RN-25 Zone and the proposed resident demographic. The Study recommends that the proposed development be considered for approval with no requirements for off-site transportation network improvements.

5.2 Functional Servicing and Stormwater Management Report

WalterFedy prepared a Functional Servicing and Stormwater Management Report (dated November 10, 2023) to identify how the proposed development will be serviced and determined if there is adequate capacity in existing municipal infrastructure to service the proposed development. The Report also provides a preliminary stormwater management design.

The Report concludes that:

- A 150-mm-diameter sanitary service sloped at 1.0% is sufficient to support the development. The sanitary service will connect to the municipal sewer on Albert Street.

- A 150-mm-diameter water service connected to the existing 150-mm-diameter watermain on Albert Street is proposed to service the development. A new water meter and backflow preventer will be contained within the proposed mechanical room located in the underground parking structure.
- The existing municipal fire hydrants along Albert Street and Seagram Drive provide coverage to support fire protection for the proposed development.
- Post-development peak flow rates will be controlled to pre-development levels for the 2-year through the 100-year storm events through the use of rooftop ponding.
- A storm service from the proposed underground parking structure will connect to the municipal sewer on Seagram Drive. Runoff from the roof and the parking area will be directed to the mechanical plumbing system and then will be ultimately directed towards this new service.
- An OGS unit is proposed to provide stormwater quality control for the site. The unit will be installed to treat the runoff prior to entering the municipal system.
- Site grading will allow for major overland flow paths towards the municipal right-of-way. The site grading also ensures surface ponding does not exceed a depth of 30 cm, or a ponding time of 48 hours in hardscaped areas.

5.3 Geotechnical Investigation

A Geotechnical Investigation (dated July 28, 2023) was prepared by Chung & Vander Doelen Engineering Ltd. To assess subsurface conditions of the site and make geotechnical recommendations for the foundation design, groundwater control during construction, and backfilling and shoring.

The Investigation included the advancement of four boreholes to depths between 24.6 and 24.85 metres below the ground surface. Groundwater monitoring wells were installed in three of the boreholes and measured groundwater at depths between 3.75 and 5.22 metres below surface elevation.

The Investigation determined:

- The surficial pavement, topsoil, and fill materials are underlain by very loose to compact fine granular deposits, which were then underlain by a very stiff to hard clayey silt till. Very dense, saturated sand layers/lenses were encountered within the clayey silt till.
- The maximum depth of excavation will be below the groundwater table, requiring the basement walls and floor slabs to be water-proofed, and the floor slabs will need to be structurally reinforced to withstand hydrostatic pressure.
- Excavation for the foundation requires pre-draining of the soils and a dewatering system. Localized depressurization may be required in some areas as the excavations will be made within or below cohesive deposits.

- A shoring system will be required to support the excavation and not compromise the foundations of the bordering roadways and neighbouring properties.
- A disposal plan for excess soils is recommended to manage the quantity as well as where and how excess soils can be disposed of off-site.

The Investigation provides hydraulic conductivity, analytical laboratory testing, and design recommendations for foundations, grading operations, floor slab construction, excavations for site services, and pavement structure.

5.4 Environmental Noise Assessment

SLR prepared an Environmental Noise Assessment (dated November 22, 2023) to examine the impacts of the environment on the proposed development, impacts of the proposed development on the environment, and impacts of the proposed development on itself.

The Assessment findings are as follows:

- Transportation Noise
    - Exterior wall and window construction meeting the minimum non-acoustical requirements of the OBC are expected to be sufficient to meet MECP indoor transportation noise guidelines;
    - The provision for installing air conditioning at a later date with an MECP Type C warning clause is recommended for all suites within the proposed development;
    - Warning clauses should be included in agreements and registered on Title for the residential units and included in agreements of purchase and sale/rental agreements;
- Stationary Source Noise
    - Stationary source sound levels from the surrounding institutional sources were assessed against the applicable MECP NPC-300 Class 1 Area guidelines;
    - Stationary source sound levels from the surrounding establishments were found to meet the applicable guideline limits without the requirement for noise control measures;
    - As the proposed development is located in proximity to stationary noise sources, a Type E warning clause is required for all units.

The Assessment concludes that noise from the environment on the proposed development can be adequately controlled with the inclusion of ventilation and warning clause recommendations. Noise from the proposed development on itself is not expected to be of concern. Noise from the proposed development on the surroundings is expected to meet applicable guidelines limits.

The acoustical design of the mechanical systems should be reviewed by an acoustical consultant during the Site Plan Approval process as part of final building design.

5.5 Pedestrian Wind Assessment

A Pedestrian Wind Assessment (October 26, 2023) was prepared by SLR Consulting to assess the proposed development's impact on wind on surrounding uses as well as effects of the wind on common outdoor areas of the proposed development. Wind comfort conditions were predicted on and around the development to identify potentially problematic windy areas.

The Assessment concludes:

- Building entrances and walkways:
    - Conditions are expected to remain similar to the existing wind conditions and be comfortable for sitting throughout the year, which is considered appropriate;
    - The current configuration of the main entrance (facing east, recessed from the building façade, and located under a canopy) is positive and should be retained in the final design;
- Outdoor amenity
    - The grade-level outdoor patio is expected to be comfortable for sitting in the summer and sitting or standing in the winter, which is considered appropriate;
    - The current configuration of the outdoor patio (facing south, recessed into the building façade, and located under a patio) is positive and should be retained in the final design;
    - Wind conditions on the level 7 rooftop patio are characterized by strong wind through the year due to the prevailing winds and its location at the base of the tower, and are suitable for walking or better in the summer. In the southwest corner wind conditions will be uncomfortable in the summer. In the winter, uncomfortable conditions are generally expected. It is recommended that tall screens be implemented along the north, west, and south edges of the rooftop patio in conjunction with overhead projection such as trellises or canopies to improve wind conditions on the terrace.
- Surrounding sidewalks
    - In both the existing and proposed configurations, wind conditions on the sidewalks surrounding the site are predicted to be comfortable for walking or better throughout the year, which is considered appropriate;
- Wind Safety
    - The wind safety criterion is generally expected to be met at most grade-level areas in both the Existing and Proposed Configurations. However, exceedances

occur near the southwest corner of the Wilfrid Laurier University campus building, as well as at the northwest and northeast corners of the proposed development, and over most of the Level 7 rooftop patio. Note that elevated wind activity at the Wilfrid Laurier University campus building is an existing condition, is not the result of the presence of the proposed development and is predicted to be slightly improved by the presence of the proposed development.

Wind mitigation measures will be explored for the 7th level terrace through the site plan approval process.

5.7 Energy Strategy Study

WalterFedy prepared an Energy Strategy Study (dated November 9, 2023) to evaluate various energy conservation measures and recommend which measures to implement to achieve minimum energy efficiency improvement of at least 25% relative to the Ontario Building Code SB-10 baseline.

The Study recommends solar photovoltaic panels on the roof, infiltration mitigation (spray-foam and sealing adhesive applied to the building envelope), a domestic hot water heat pump to provide domestic hot water heating, and triple glazed windows to achieve a 25% improvement in energy efficiency. Air-source VRF and water source heat pumps are optional.

5.8 Shadow Study

A Shadow Study (dated November 16, 2023) was prepared by WalterFedy to examine shadow impacts generated by the proposed development. The Study examines shadow impacts at 8 am, 9 am, 10 am, 11 am, noon, 1 pm, 2 pm, 3 pm, 4 pm, 5 pm, 6 pm, and 7 pm on the spring and fall equinoxes and the summer and winter solstices.

The Study analysis states:

- Spring - In the spring, the morning shadows are mostly cast behind the site on properties with limited buildings/structures. During the 11:00am interval, the building will briefly shade the residential yards of the neighbouring properties to the north. The strength of the sun in the evening will be limited and will set fast, as observed from 4:00pm onwards, causing the shadows to be long and stretch onto neighboring properties for short duration. The sidewalks opposite the site, to the east, remain mostly in sun throughout the day due to the narrow massing of the tower. The narrow adjacent property, to the north of the site, remains mostly in the shadow of the building during the morning until mid-afternoon.

- Summer - The shadows in the summer are shorter and shade the adjacent properties on the north and west for brief intervals during the morning. In the afternoon, the shadows are mostly positioned over the roadway or on the site itself. The shadows begin to stretch into adjacent sites to the east and south around 4:00 pm.
- Fall - In the fall, the morning shadows are mostly cast behind the site on unbuilt land. During the 10:00am interval, the building will briefly shade the residential yards of the neighbouring properties to the north. The strength of the sun in the evening will be limited and will set fast, as observed from 4:00pm onwards, causing the shadows to be long and stretch onto neighboring properties for short duration. The sidewalks opposite the site, to the east, remain mostly in sun throughout the day due to the narrow massing of the tower. The narrow adjacent property, to the north of the site, remains mostly in the shadow of the building during the morning until mid-afternoon.
- Winter - During winter, the building casts longer shadows onto neighboring properties due to the low sun angle. During the 9:00am and 10:00am intervals the building shades the residential yards of the neighbouring properties to the north. However, by 11:00am, most of the properties, to the north of the site, are exposed to the sun. The shadows begin to stretch into neighbouring properties to the east and south around 12:00 pm.

The Study concludes that the Urban Design Manual is achieved for all properties within the site context apart from 181 Albert Street, adjacent to the north.

6.0 Consultation

6.1 Public Consultation

The Planning Act (specifically O. Reg 544/06, amended by O. Reg. 178/16) requires that applicants submit a proposed strategy for consulting with the public with respect to an application as part of the 'complete' application requirements. This section summarizes the proposed Public Consultation Strategy.

The public consultation process for the proposed Official Plan Amendment and Zoning By-law Amendment applications is anticipated to follow the Planning Act statutory requirements. The following points of public consultation are proposed:

- An Informal Public Meeting at which time all available information, and public input will be received.
- Direct written responses to comments raised through the public consultation process will be provided to City Staff for their review and consideration in the preparation of a City Staff Report.
- Preparation of a City Staff Report, with the Report to be available to the public in advance of City Council's consideration of the applications.
- A Formal Public Meeting, at which time the City Staff Report, all available information, and public input will be considered in Council's final decision.

The consultation strategy proposed will provide members of the public with opportunities to review understand and comment on the proposed applications. The consultation strategy will be coordinated with City Staff and additional opportunities for consultation will be considered and may be warranted based on the input received.

7.0 Conclusion

This Planning Justification Report concludes that the proposed Official Plan and Zoning By-law Amendment application for 177 and 179 Albert Street to permit additional density and to amend certain performance standards to permit the proposed high-rise building is in the public interest and represents good planning for the following reasons:

- The Official Plan and Zoning By-law Amendment is consistent with the *Provincial Policy Statement*;
- The Official Plan and Zoning By-law Amendment conforms to the Growth Plan for the Greater Golden Horseshoe;
- The Official Plan and Zoning By-law Amendment conforms to the Region of Waterloo Official Plan;
- The Official Plan and Zoning By-law Amendment proposes a high density residential development within a *Major Transit Station Area* and *Major Corridor*, where growth is planned for and encouraged;
- The development is compatible with surrounding land uses and built forms;
- The development makes efficient use of infrastructure and will support higher order transit (ION);
- The development includes a mix of unit sizes with and without parking spaces, allowing for a range of prices that are attainable for future residents of the building; and
- The proposed development, which includes housing geared to students, will assist in meeting the shortage identified in the Student Accommodation Study.

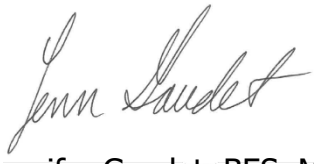
It is our opinion that the requested amendments should be approved.

Respectfully submitted,

MHBC



Trevor Hawkins, M.PL, MCIP, RPP
Partner



Jennifer Gaudet, BES, MCIP, RPP
Senior Planner