PLANNING JUSTIFICATION REPORT ADDENDUM

PREPARED FOR:

Official Plan and Zoning By-Law Amendment
14688210 CANADA INC.
177-179 Albert Street

File no. 15200F

May 22, 2025

Your Vision

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MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

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1.0 Introduction

1.1 Purpose of the Report

McNaughton Britton Clarkson Planning Limited (hereinafter "MHBC") has been retained by 14688210 Canada Inc. (hereinafter the "Owner") to provide land use planning services with respect to the proposed redevelopment of their lands located at 117-179 Albert Street North in the City of Waterloo (herein after the "subject lands"). To permit the proposed development, an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) are required. An application for an Official Plan and Zoning By-law Amendment were submitted to the City of Waterloo in January, 2024 and deemed complete.

Comments were received from the City, and also included comments from the Region of Waterloo, Enova Power, Canada Post and the Waterloo Region District and Waterloo Catholic District School Boards. In light of comments received, the development proposal was revised and resubmitted to the City for consideration on October 11, 2024, along with a detailed response outlining how the revised proposal addressed the written comments. Attached in **Appendix A** is a detailed response matrix summarizing our response to the comments received. It is noted that since the initial submission of the OPA and ZBA applications, a number of land use policy and regulatory changes have occurred at the Provincial and municipal levels that affect the subject lands, including:

- Bill 185
- Adoption of Inclusionary By-law
- Repeal of the Growth Plan for the Greater Golden Horseshoe and Provincial Policy Statement and approval of the Provincial Planning Statement, 2024 on October 20, 2024; and
- Approval of OPA No. 58 by Waterloo City Council, with OPA 58 implementing the first phase of the Official Plan Review process currently being undertaken by the municipality.

In light of the above, the purpose of this Report is to provide a supplemental planning justification for the revised development proposal with respect to the relevant Provincial and municipal policy framework applicable to the proposed development. This Report has been prepared for submission to the City of Waterloo and includes the following:

- A brief description of the subject lands and surrounding uses, to be read in conjunction with the January 2024 Planning Justification Report;
- A description of the revised development concept and revised proposed Official Plan and Zoning By-law Amendments, with comparisons to the original proposal where appropriate;
- A review and assessment of the existing Provincial and municipal policy framework in relation to the revised proposed development, to be read in conjunction with the land use planning analysis as contained in the January 2024 Planning Justification Report; and

- A review of the revised technical reports prepared in support of the revised development proposal, which were initially included in the aforementioned October 2024 resubmission.

1.2 Subject lands and Surrounding Area

The subject lands are municipally addressed as 177-179 Albert Street and possess frontage on both Albert Street North and Seagram Drive. The lands have a combined total lot area of 0.1473 hectares after confirmed road widening conveyances, being 40.176 metres along Albert Street and 40.234 metres along Seagram Drive.

The subject lands are located at the northwestern corner of the intersection of Albert Street North and Seagram Drive. The subject lands are located within the Laurier-Waterloo Park Protected Major Transit Station Area (PMTSA), situated adjacent or in close proximity to major components of the Laurier Campus, including the 'main' campus bounded by University Avenue West, King Street North, Bricker Avenue and Albert Street to the east; University Stadium to the south opposite Seagram Drive; Laurier Place lands adjacent to the west, and additional campus lands to the north.

It is noted that lands fronting Seagram Drive, and lands fronting Albert Street north of Bricker Avenue, are designated for High Density residential uses similar to the subject lands, and are also located within the Laurier-Waterloo Park MTSA.

The lands are located one block south of the Northdale neighbourhood, where the large majority of student housing projects have been built out. The block where the lands are located are part of the same station area and upon further build out will be an extension of student and university uses like in the Northdale community and assist in rounding out the Protected Major Transit Station Area. Seagram Drive is a designated minor collector road in the Official Plan and is a short segment of road starting at Albert Street and ending at University Avenue.

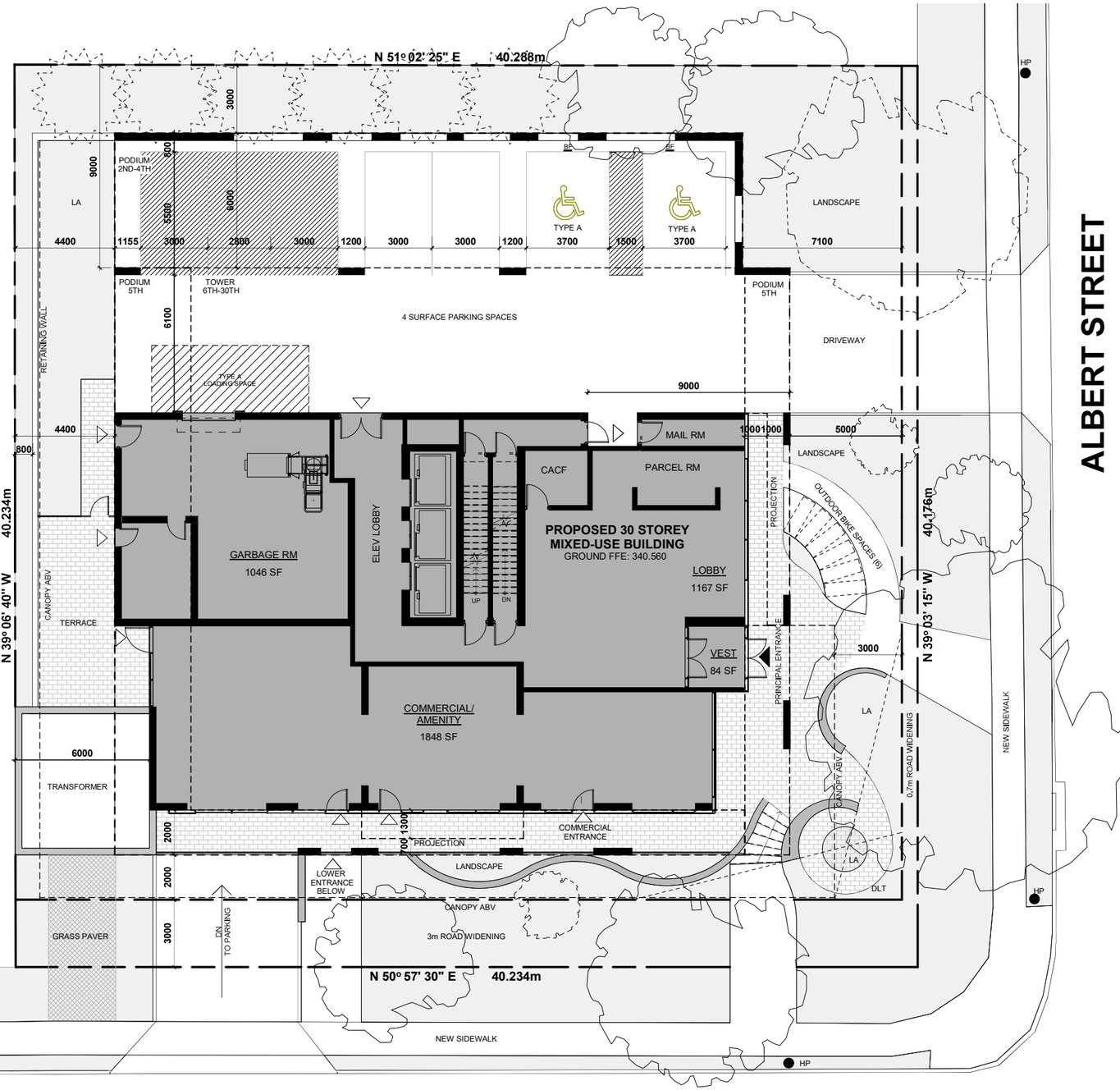
1.3 Revised Development Proposal

The proposed development has been revised in consideration of City and agency comments received regarding the original submission, confirmation of required road widenings, increased height provisions resulting from City adoption of OPA 58, and new regulations regarding the provision of affordable housing. While a minimum amount of parking on the subject lands to support new development is no longer required within PMTSAs as a result of Bill 185 regulatory changes, the proposed parking remains generally unchanged from the original proposal.

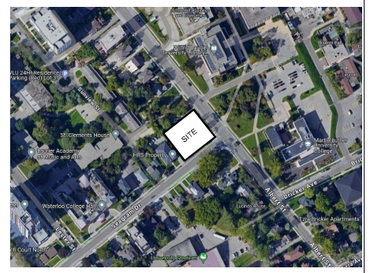
Modifications to the development proposal also are a result of consultation with the City off Waterloo, Wilfrid Laurier University and comments from surrounding neighbours.

The revised site plan is enclosed as **Figure 1**.

FIGURE 1



1 A1.1 **SITE PLAN**
SCALE: 1 : 100



KEY PLAN

DETAILS OF DEVELOPMENT

DATA		REQUIRED	PROVIDED
ZONING		RMU-81	
GROSS LOT AREA (m²)		1619	
AREA OF ROW (m²)		146	
NET LOT AREA (m²)		1473	
NUMBER OF UNITS		231	
UNIT TYPES STUDIO 1 BED 2 BED 3 BED		 56 35 86 54	
LOT FRONTAGE (MIN-m)		20	40
SETBACKS (MIN-m)	FY ALBERT	5.0	5.0
	RY	5.0	4.4
	RY BASEMENT		0.8
	SY	3.0	3.0
	SY SEAGRAM SUPPORT COLUMN	3.0	2.0
	SY SEAGRAM BUILDING	3.0	4.0
SL SETBACKS (MAX-m) E. SL: 6.0 S. SL: 75% OF THE SL		 6.0 30	 5.0 2.0
BUILDING HEIGHT (MIN-m)		13.5	102
BUILDING HEIGHT (MAX-m)		81	102
HEIGHT OF FIRST STOREY (MIN-m)		4	6.2
PODIUM HEIGHT (MIN-m)		10.5	21
PODIUM HEIGHT (MAX-m)		21 6 STOREY	21 6 STOREY
NUMBER OF STOREYS		25	30
DENSITY (MIN-BEDRM/HA)		150	2887
DENSITY (MAX-BEDRM/HA)		750	2887
NUMBER OF BEDROOMS		110	425
LANDSCAPE AREA (MIN-m²)		442	521
LANDSCAPE AREA (MIN-%)		30	35.4
HORIZONTAL TOWER DIMENSION (MAX-m)		40	24
TOWER FOOTPRINT (MAX-m²)		1000	578
TOWER STEPBACK ABOVE PODIUM (MIN-m)		3	2
AMENITY AREA 3m² / UNIT + 2m² / ADDITIONAL BEDROOM		3(231) +2(194) = 1081	INDOOR= 607 OUTDOOR= 136 BALCONY= 340 TOTAL= 1083
PARKING REQUIRED		0	37
No. OF BARRIER FREE SPACES OF TOTAL 1 TYPE 'A' AND 2 TYPE 'B'		0	3
BIKE RACKS 0.3/UNIT		70 TYPE A 70 TYPE B	198 6
GARBAGE		INDOOR	

RENTABLE FLOOR AREA	
GROUND FLOOR (COMM)	1848 (SF)
2ND-4TH FLOOR	8 X 3 STOREY = 30 UNITS
5TH FLOOR	9 UNITS
7TH-30TH FLOOR	8 X 24 STOREY = 192 UNITS
TOTAL	**1848 SF COMM + 231 RES UNITS**

GROSS FLOOR AREA (SF)	
BASEMENT	11,670
LOWER GROUND FLOOR	11,530
GROUND FLOOR	5,110
2ND-4TH FLOOR	9460 X 3 STOREY = 28,380
5TH FLOOR	7,650
6TH FLOOR	6,670
7TH-30TH FLOOR	6630 X 24 STOREY = 159,120
MECH PENTHOUSE	2,570
TOTAL	**232,700**

THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND REPORT ALL ERRORS AND DISCREPANCIES TO THE CONSULTANT.

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REVISIONS:

NO.:	DATE:	ISSUED:
1	2025.05.12	ISSUED FOR OPA/ZBA

ONTARIO ASSOCIATION OF ARCHITECTS
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PROJECT:

177-179 ALBERT ST

177-179 ALBERT STREET, WATERLOO

MODERN REAL ESTATE DEVELOPMENT

DRAWING TITLE:

SITE PLAN

DATE:	2025.04.08
SCALE:	As indicated
DRAWN:	HS
STATUS:	WD
JOB NO.:	2410

DRAWING NO.:

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As illustrated in the revised site plan, the proposed building remains comprised of a point tower situated atop a podium. While the height of the podium is maintained at 6 storeys along the Albert Street and Seagram Drive frontages, podium height has been reduced to four storeys on the northern and western sides of the building, with a further step down in height to 5.2 metres toward the west property line. The height of the point tower has increased from to 30 storeys in recognition of the building height afforded to the subject lands through OPA 58.

The location of the podium and tower have been evaluated in many forms to locate the building to have the least amount of impact on the potential development for other lands within the block. Through consultation with Wilfrid Laurier University staff, the project team ultimately decided to shift the podium southward towards Seagram Drive to bring an extended canopy to the property line and provide a street line setback of 2.0m (after the road widening) and align with the other built form already established along the north side of Seagram Drive. At grade, the podium is setback 4.0m front the south property line (Seagram Drive) and 7.0m from the front property line along Albert Street. The step backs for the base allow for an increased front yard and exterior side lot area for residents to use, which is covered and provide shade and shielding during different weather conditions. The first storey (at grade) is proposed at 6.2m in height, which provides a very open and interactive front and exterior side yard realm with both sun and shade area, and allow for enhanced landscaping.

The landscaping at grade will be enhanced along both street frontages and be lined with decorative retaining walls and planting beds and also extend into the public realm (road widening area), where the applicant is committed to providing for shade trees to enhance the pedestrian zone and soften the street edge.

The tower has also been shifted to the south to provide for a larger tower separation than originally proposed. The tower separation proposed is now 9.0m from the north property line to help maintain adequate separation between the property line and not hinder development opportunities for future Wilfrid Laurier University campus lands. A tower separation of 7.8m is also proposed from the west property line to an established multiple building.

The number of units in the revised development proposal provides for 231 units and overall unit mix from the original proposal of 146 units. The additional units provide a greater number of two-bedroom units, the inclusion of three-bedroom units, and a greater overall balance between the number of studios, one- and two-bedroom units provided. **Table 1** below compares the unit mix accommodated in the original and revised development proposals.

	Original Proposal		Revised Proposal	
	Total	**% of Total Units**	**Total**	**% of Total Units**
Studio Units	0	0%	56	24.2%
One Bedroom Units	120	82%	35	15.1%
Two Bedroom Units	26	18%	86	37.2%
Three Bedroom Units	0	0%	54	23.3%
Total Units	146	100%	231	100%

A total of 4% of the planned residential units are planned as affordable dwelling units. The affordable housing will be provided in accordance with the CMHC criteria for affordability, where at the units will have rents below 30% of the median total income of all families in the subject market.

On the ground floor level fronting Seagram Drive, 157 square metres (1,700 square feet) of commercial/amenity floor area is accommodated in the revised concept and occupies the entirety of the southern façade of the podium as illustrated, whereas a fitness room and secure bicycle parking was accommodated in the original proposal. The lobby fronting Albert Street is also more pronounced along the eastern façade of the podium when compared to the original proposal. The inclusion of commercial ground floor area contributes to the activation of Seagram Drive, and provides opportunities for accommodating a range of uses that serve the surrounding neighbourhood as well as students.

With respect to amenity areas, the proposed fitness room, study areas, and other common areas from the original proposal have been consolidated on the sixth level of the building in the revised concept. This 'amenity floor' accommodates a fitness, communal kitchen and dining area and associated balcony, study rooms, two meeting rooms, games room and a lounge. Outdoor amenity is also provided on this floor on the west and south side of the building. An additional outdoor amenity space is provided at grade along the western property boundary, whereas an additional indoor amenity area is accommodated within the lower ground floor level along the Albert Street frontage. Overall, 1,083 square metres of amenity area is accommodated in the revised proposal as follows:

- Indoor: 607 square metres
- Outdoor: 136 square metres
- Balcony: 340 square metres

37 structured parking spaces are accommodated in the revised development proposal, slightly less than the 44 proposed in the previous submitted site plan.

Overall, the revised development proposal has a density of 2887 bedrooms per hectare (post-widenings) and is estimated to accommodate 425 residents and 4 jobs as follows:

People	**People Per Unit-PPU****	**Number of Units**	**Number of People**
Studio Apartment	1.25	56	70
One-Bedroom Apartment	1.25	35	44
Two-Bedroom Apartment	2.22	86	191
Three Bedroom Apartment	2.22	54	120
		Total	**425**
Jobs	**GFA per Employee*****	**Total GFA**	**Number of Jobs**
Commercial Employment	450 sq.ft	1,700	3.7
		Total	**425**
		Total People and Jobs	429
		Land Area (post-widenings)	0.1473 ha
		People and Jobs per Hectare	**2,912**

**PPU and GFA per Employee values taken from the City of Waterloo Development Charges Background Study, 2020 prepared by Hemson*
***Average occupancy of apartments PPU, used by Hemson for forecasting purposes (See Section 8.1 of Background Study document)*
****Non-Residential rates as per Section 8.2 of Background Study document*

Table 2 below compares the revised development proposal to that of the original in the context of the applicable regulations of the RMU-81 Zone category. As illustrated in the Table below, variances to regulations regarding density and tower separation remain required in the revised proposal. While a reduced parking ratio is still proposed, minimum parking requirements can no longer be prescribed within MTSAs as a result of recent *Planning Act* changes. Details of the revised Official Plan and Zoning By-law Amendments to accommodate the revised proposal are outlined in Section 1.4 following **Table 2** below.

TABLE 2. Zoning Comparison Table

Regulation	Required (RMU-81)	Provided (Original Proposal)	Provided (Revised Proposal)
Minimum Lot Frontage	20 m	40.176 m (Albert) 40.234 m (Seagram)	40.176 m (Albert) 40.234 (Seagram)
Street Line Setback **Minimum**	5 m	5.08 m (Albert) 5.05 m (Seagram)[1]	5 m (Albert) and 7m to podium façade at grade **2 m (Seagram) and 4 m to podium façade at grade**
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)	100% @ 5 m (Albert) 100% @ 0 m to canopy projection, 2 m to support columns and 4 m to podium façade at grade (Seagram)
Minimum Side Yard Setback	3 m	3 m (north)	3 m (north)
Minimum Rear Yard Setback	5 m	5.028 m (west)	**0 m to transformer room, 0.8 m to underground parking garage extending above grade and to canopy above, 4.4 m to one storey podium**
Minimum Low Rise Residential Lot Line Setback	7.5 m of half the height of the building, whichever is greater	Not applicable	Not applicable
Building Height **Minimum**	13.5 m	75.24 m	**102 m and 30 storeys**
Maximum	81 m and 25 storeys		
Density **Minimum**	150 bedrooms per hectare	**1,064 bedrooms per hectare (before widening) and 1,150 bedrooms per hectare (after estimated widening)** = 172 bedrooms (+51 bedrooms)	**2,625 bedrooms per hectare (pre-widening) and 2,885 bedrooms per hectare (post-widening)** = 425 bedrooms (+304 bedrooms)
Maximum	750 bedrooms per hectare = 121 bedrooms		

Regulation	Required (RMU-81)	Provided (Original Proposal)	Provided (Revised Proposal)
Minimum Landscaped Open Space	30% = 442 sq. m (post-widenings)	**24.4%** = 394 sq. m (pre-widenings)	35.4% = 521 sq. m (post-widening)
Minimum Height of First Storey	4 m	5 m	6.2 m
Podium Height **Minimum** **Maximum**	10.5 m 21 m and 6 storeys	18 m, 5 storeys	20.4 m, 6 storeys (east), 4 storeys (north), **5.2 m, 1 storey (west)**
Tower Separation	11 m from an interior lot line	**9.5 m (north)** **10.8 m (west)**	**9.0 m (north)** **7.8 m (west)**
Maximum Tower Horizontal Dimension	40 m	22.57 m (Albert) 20.57 (Seagram)	25.5 m (Albert) 25.7 m (Seagram)
Maximum Tower Footprint	1,000 sq. m	463 sq. m	578 sq. m
Minimum Tower Stepback above Podium on the Front and Flanking Facades	3 m	3.75 m (Albert) 3.050 m (Seagram)	Seagram Drive: 30% of tower facade located at 0.7 metre stepback and 70% of tower facade located at a 2.0 metre stepback Albert Street: 40% of tower facade located at 1.0 metre stepback and 60% of tower façade located at 2.0 metre stepback
Minimum Amenity Area	3 sq. m for the first bedroom and 2 sq. m for each additional bedroom in the dwelling unit (1081 sq. m given increase in proposed bedrooms)	524.5 sq. m	1,083 sq. m
Parking Residential	0 spaces, given location within MTSA	0.20 spaces per bedroom	0.087 spaces per bedroom

Regulation	Required (RMU-81)	Provided (Original Proposal)	Provided (Revised Proposal)
Visitor	0 spaces, given location within MTSA	0.05 spaces per bedroom	
Accessible Parking Type A	0 spaces, given location within MTSA	1	1
Type B	0 spaces, given location within MTSA	1	2
Bicycle Parking Type A	0.3 / unit = 69 (given increase in proposed bedrooms)	88	198
Type B (All Other)	0.3 / unit = 69 (given increase in proposed bedrooms)		6
Total	88		287
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	>60% 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.	Complies – the ground floor facing Seagram Drive contains the permitted uses.
Architectural Projection, Class C	Architectural canopy – Maximum encroachment of 1.5m measured from the building setback required in the zoning applied to the lot	N/A	**Albert Street Canopy: 3.0m** **Seagram Drive Canopy: 0.0m**

[1] *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*

1.4 Revised Official Plan and Zoning By-Law Amendments

To implement the revised development proposal, a change in the scope of the original requested Official Plan and Zoning By-law Amendments are required. The following provides an overview of the revised amendments, which both address the revised proposal and comments received from staff on the original submission.

1.4.1 Revised Official Plan Amendment

The revised Official Plan Amendment includes amending Schedule 'A6' *Specific Policy Areas* to apply a new Specific Policy Area to the subject lands (SPA XX) that:

1. Permit an increase in the total building height to 30 storeys in height
2. Permits a maximum density of 2,885 bedrooms per hectare; and
3. Requires a minimum 4% of total residential units be provided as affordable housing units.

The original proposed Official Plan Amendment included a request to remove the subject lands from Specific Policy Area 20 (specifically SPA 20I), which dually designates lands for Academic purposes. Considering comments received by staff, this request has been rescinded with the understanding that academic uses are not proposed within the development at this time.

The proposed Official Plan Amendment is illustrated in **Figure 2**.

1.4.2 Revised Zoning By-Law Amendment

The revised Zoning By-law Amendment implements the revised Official Plan Amendment and establishes site-specific provisions to permit the revised development proposal. The following site specific provisions are to apply to the subject lands, notwithstanding the regulations in the Zoning By-law, through the proposed Amendment:

1. **Maximum Density:** 425 bedrooms (2,625 bedrooms per hectare (pre-widening), 2,887 bedrooms per hectare (post-widening))
2. **Minimum Provided Affordable Housing Units:** 4% of total number of units
3. **Maximum Building Height:** 30 storeys and 102 metres
4. **Minimum Street Line Setback**: Seagram Drive: 2 metres to support columns and upper podium, 4 metres to podium façade at grade
5. **Architectural Projection (Canopy)**: 3.0m from Albert Street and 0m from Seagram Drive.
6. **Minimum Rear Yard** (additional requirements):
    a. Hydro Transformer Room: 0 metres
    b. Parking Structure: 0.8 metres (for the structure that extends out of the ground from the lowest grade at the rear of the property)
    c. Podium Facade: 4.4 metres (measured at defined grade along Albert Street)
7. **Minimum Podium Stepback:**

a. Seagram Drive: 30% of tower facade located at 0.7 metre stepback and 70% of tower facade located at a 2.0 metre stepback
b. Albert Street: 40% of tower facade located at 1.0 metre stepback and 60% of tower façade located at 2.0 metre stepback

8. **Minimum Tower Separation:**
    a. 9.0 metres (north lot line)
    b. 7.8 metres (west lot line)
9. **Minimum Podium Height** – 1 storey, 5.2 metres along west property line for height of Transformer Room and decorative canopy, whereas the minimum height requirement for the podium is 10.5m.

A draft of the proposed Zoning By-law Amendment is illustrated in **Figure 3**.

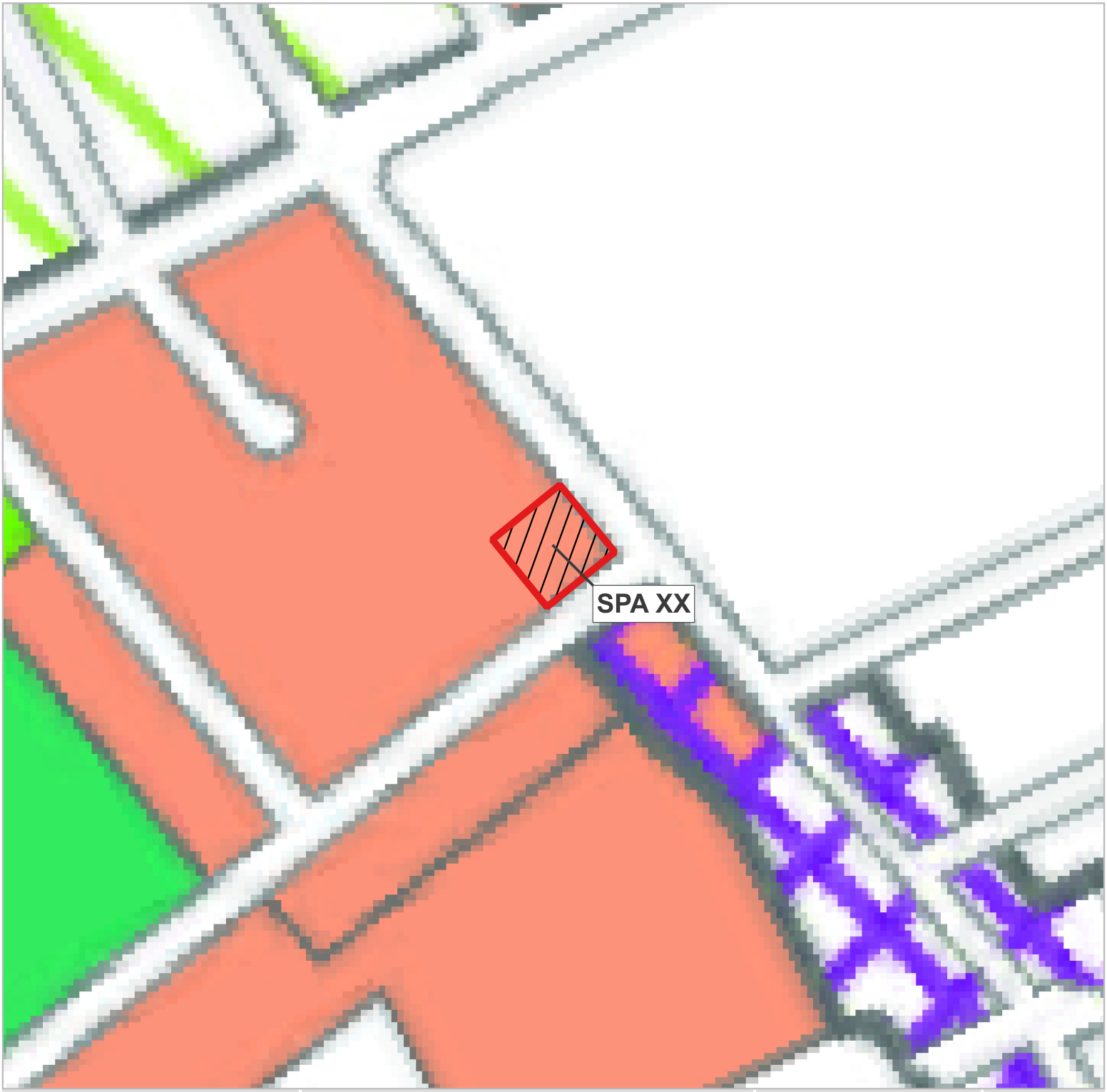


Figure 2
Proposed Official Plan Amendment

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

LEGEND

Subject Lands

Lands to be amended by adding the following Specific Provision Area:
- Maximum Density: 2,887 bedrooms per hectare.
- Maximum Building Height: 30 storeys (105 metres)
- Affordable Housing Units: 4% of total unit count

Date:	May 2025
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north

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Figure 3
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. Maximum Density: 425 bedrooms (2,625 bedrooms per hectare (pre-widening), 2,887 bedrooms per hectare (post-widening))
ii. Minimum Provided Affordable Housing Units: 4% of total number of units
iii. Maximum Building Height: 30 storeys and 102 m
iv. Minimum Street Line Setback: Seagram Drive: 2 m to support columns and upper podium, 4 m to podium façade at grade
v. Architectural Projection (Canopy): 3 m from Albert Street and 0 m from Seagram Drive.
vi. Minimum Rear Yard (additional requirements):
vii. Hydro Transformer Room: 0 m
viii. Parking Structure: 0.8 m
ix. Podium Facade (80%): 4.4 m
vii. Minimum Podium Stepback:
- Seagram Drive: 30% of tower facade located at 0.7 m stepback and 70% of tower facade located at a 2.0 m stepback
- Albert Street: 40% of tower facade located at 1.0 m stepback and 60% of tower façade located at 2.0 m stepback

viii. Minimum Tower Separation:
- 9.0 m (north lot line)
- 7.8 m (west lot line)

ix. Minimum Podium Height – 1 storey, 5.2 m along west property line for height of Transformer Room and decorative canopy

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2.0 Analysis

The revised development proposal continues to conform to the Region of Waterloo Official Plan and the City of Waterloo Official Plan as demonstrated in the January 2024 Planning Justification Report. Since the submission of the original OPA/ZBA application, the province has approved the Provincial Planning Statement, 2024, and repealed both the Growth Plan for the Greater Golden Horseshoe and Provincial Policy Statement. Furthermore, the City of Waterloo has adopted both a new Inclusionary Zoning By-law and an Official Plan Amendment that implements the first phase of the ongoing Official Plan Review; both of which impact the subject lands. The following section of this Report reviews the Provincial Planning Statement, 2024, as it applies to the subject lands and how the revised proposal conforms to that framework, as well as provides a supplemental analysis of the City of Waterloo Official Plan framework as it applies to the revised development proposal.

2.1 Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS) was approved by the Minister of Municipal Affairs and Housing on October 20, 2024, and is applicable to the City of Waterloo. It provides general policy direction on matters of provincial interest related to land use planning and development, and outlines policy for Ontario's long-term prosperity, economic health and social well-being. These directives help to inform Municipalities' Official Plans and Zoning By-laws, which then allow for the efficient use of lands and development patterns that support strong, livable and healthy communities that protect the environment and public health and safety, and facilitate economic growth.

Settlement Areas and Housing

The PPS directs that settlement areas be the focus of growth and development, with growth to be focussed, in part, in major transit station areas as per Policy 2.3.1.1. Furthermore, Policy 2.3.1.2 states land use patterns should be based on densities and mix of land uses which:

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

The revised development proposal continues to represent the efficient use of land and existing infrastructure. Since the previous submission, the engineer has confirmed that with only one extra

unit being proposed to the development that the peak sanitary flow increases marginally from 5.28L/s to 5.30 L/s. They have also confirmed that the commercial area has stayed the same.

The proposed development will establish additional residential population in proximity to rapid transit and existing active transportation routes, including bicycle lanes along Seagram Drive and Albert Street that provide connections to the overall city cycling network, and Laurel Trail which (located 500 metres to the west) provides cycling connections south to Kitchener and north Waterloo. The proposed commercial unit along Seagram Drive also serves to activate the pedestrian and cyclist connection to the ION platform along this roadway.

Section 2.2 of the PPS provides the policy framework for housing. As per Policy 2.2.1, planning authorities shall provide for an appropriate range and mix of housing options to meet projected needs by:

a) Establishing and implementing minimum targets for the provision of affordable housing;
b) Permitting and facilitating all housing options and all types of residential intensification, including new housing options within previously developed areas and redevelopment which results in a net increase in residential units;
c) Promoting densities which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and
d) Requiring transit-supportive development and prioritizing intensification in proximity to transit.

The proposed amendments include special provisions requiring a minimum of 4% of total units being established as affordable housing units (or ten units considering 231 units proposed within the revised development). The mix of residential units has been expanded in the revised proposal to include a greater percentage of two-bedroom units (37% of total units compared to 18% in the original proposal), and the addition of three-bedroom units. The proposed development represents a net increase in the number of residential units provided in comparison to the current use of the lands, and the inclusion of increased study space and communal kitchen/dining facilities as part of the amenity component of the development will cater to the various needs of new residents. Overall, the proposed development is of a density that will support the use of rapid transit and existing active transportation infrastructure, accommodates opportunities to improve existing active transportation infrastructure through dedicated road widenings, and represents one of the few opportunities for transit-supportive intensification over the short to medium term within the Laurier-Waterloo Park MTSA when considering property sizes and lot fabric within the station area.

Strategic Growth Areas and Major Transit Station Areas

Major transit station areas are a strategic growth area in the PPS, 2024. Regarding strategic growth areas, growth and development is to be focussed in strategic growth areas as per Policy 2.4.1.1, with strategic growth areas being planned as follows to achieve complete communities, a mix of housing options, and intensification as per Policy 2.4.1.2:

a) to accommodate significant population and employment growth;
b) as focal areas for education, commercial, recreational and cultural uses;
c) to accommodate and support the transit network and provide connection points for inter- and intra- regional transit; and
d) to support affordable, accessible and equitable housing.

Furthermore, in accordance with Policy 2.4.1.3, within strategic growth areas, planning authorities should, among other matters, identify the appropriate type and scale of development and built form transitions to adjacent areas; permit intensification to support the achievement of complete communities and compact built form; and consider a student housing strategy.

The revised development proposal implements the policy direction of OPA 58 with respect to increased building heights on the subject lands and elsewhere within the station area. The development remains designed as a point tower atop a podium, with the tower being situated in a manner that reduces potential impacts on adjacent properties and a podium design that involves reduced heights in proximity to adjacent lot lines where minimum yard setback requirements are not completely met. The proposed development provides a range of unit sizes desirable for both residents and students, with building amenities that meet the needs of residents at various life stages. Coupled with the provision of a minimum 4% of affordable housing units, the proposed development will support the housing needs of a range of individuals and families.

The development is estimated to accommodate an additional 425 residents and jobs within the Laurier-Waterloo Park MTSA to support the use of transit. The proposed development represents an opportunity to accommodate additional residential population within a station area that is predominated by educational and recreational uses, being Wilfrid Laurier University, Waterloo Park and the KW Granite Curling Club, further contributing to the station as an origin trip generator within the rapid transit system. The proposed mix of one-, two-, and three-bedroom units within the development coupled with the provision of a minimum 4% of affordable housing units provide a range of unit types along with affordable and attainable unit types within the major transit station area.

A minimum density target of 95 residents and jobs per hectare has been established for the Laurier-Waterloo Park MTSA in accordance with Policy 2.4.2.4. The proposed development will contribute to the achievement of this minimum target through the addition of both residential units and commercial floor area.

Lastly, Policy 2.4.2.6 states that major transit station areas should be planned and designed to be transit-supportive by providing the following, where feasible:

a) connections to local and regional transit services; and
b) infrastructure that accommodates a range of mobility needs and supports active transportation.

Existing sidewalks and bicycle lanes on Seagram Drive provide direct access to the ION platform to the west. The provided road widenings will accommodate any future improvements to pedestrian and cycling infrastructure within the public right-of-ways, with the siting of the proposed development contributing to the public realm by accommodating landscaping and commercial space at grade. Secure bicycle parking is provided within the development for residents as well as temporary outdoor bicycle parking for visitors and patrons of the commercial unit.

Based on the above, it is our opinion that the proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the policies of the PPS, 2024.

2.2 City of Waterloo Official Plan

Since the filing of the original OPA/ZBA submission, the City of Waterloo Official Plan has undergone two significant amendments that impact the development of the subject lands. The adoption of Official Plan Amendment (OPA) 50 and corresponding Zoning By-law Amendment by City Council on June 24, 2024 (and subsequent approval by the Region of Waterloo), implemented inclusionary zoning policies and regulations within the City's MTSAs. Given the subject lands are located within the Laurier-Waterloo Park MTSA, inclusionary zoning applies to the revised proposed development.

Secondly, on December 2, 2024, City Council adopted Official Plan Amendment (OPA) 58 to the City of Waterloo Official Plan. OPA 58 implements the first phase of the City's ongoing Official Plan Review and primarily involved updates to the City Form and Land Use policies chapters. While OPA 58 requires final approval by the Ministry of Municipal Affairs and Housing and is therefore not yet in force and effect, the adoption by Council indicates it is the desired policy direction with respect to future growth and development.

Through OPA 58, the subject lands remain designated *High Rise Residential* in Schedule A: Land Use Plan and *Major Corridor* and *Major Transit Station Area* in Schedule B: City Structure as illustrated in **Figure 4 and 5** respectively. The lands are further designated *High Rise, 30 storeys* in Schedule B1: Built Form as illustrated in **Figure 6** herein. Through OPA 58, the subject lands were afforded additional building height, from 25 to 30 storeys.

The following provides an analysis of the revised development proposal under the policy framework established by OPA 50 and OPA 58. Policy justification contained in the November 2023 Planning Justification Report remains applicable to the revised development proposal and should be reviewed in conjunction with the analysis provided below.

The proposed development conforms to the Region of Waterloo Official Plan. The redevelopment of the site proposes intensification within the Built Up Area and within a Major Transit Station Area. The proposed densities assist in achieving the reurbanization and MTSA density targets in the Regional Official Plan and is a priority location for intensification.



Figure 4
OPA 58 Schedule A: Land Use Plan - High Rise Residential

177-179 Albert St
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands
- Low Rise Residential
- Medium Rise Residential
- Medium High Rise Residential
- High Rise Residential
- Commercial and Mixed-Use
- Employment
- Major Institutional - Academic
- Open Space

Date:	May 2025
Scale:	1:5,000
File:	15200F
Drawn:	PL

north

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Figure 5
OPA 58 Schedule B: City Structure - Major Corridor

177-179 Albert St
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

Nodes and Corridors	Station Areas
Major Node	ION Rapid Transit Station
Minor Node	ION LRT
Major Corridor	Major Transit Station Area Boundary
Minor Corridor	
Primary Node	

Date:	May 2025
Scale:	1:5,000
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Figure 6
OPA 58 Schedule B1: Built Form - High Rise, 30 storeys

177-179 Albert St
City of Waterloo
Region of Waterloo

LEGEND

Subject Lands

Built Form

- Low Rise, 4 storeys
  (Northdale: Low Rise, 6 storeys)
- Medium Rise, 6 storeys
  (Northdale: Medium Rise, 8 storeys)
- Medium High Rise, 12 storeys
- High Rise, 25 storeys
- High Rise, 30 storeys

Date:	May 2025
Scale:	1:5,000
File:	15200F
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Height and Density (OPA 58)

The revised development proposal has a building height of 30 storeys consistent with the High Rise, 30 storeys designation established through OPA 58 and a density of 2,886 bedrooms per hectare (based on net lot area). Maximum residential densities are no longer prescribed in the Official Plan through OPA 58. Instead, maximum residential densities may be established in the Zoning By-law, with density provisions being *"based on considerations that are unique to individual sites or areas"* as per Policy 3.4 (3). While the policies of OPA 58 do not provide guidelines or other criteria for the evaluation of proposed densities through new development, Policy 3.4 (11) states the following with respect to density, in part:

> *3.4 (11) New development shall seek to optimize, rather than maximize, height and density on any site. Optimization involves an appropriate and desirable balance between various city-building objectives, including the provision of housing, achieving built form and urban design objectives, a vibrant public realm, local economic development, preservation and enhancement of cultural heritage resources, site functions, provision of social and amenity spaces (including green spaces), land use compatibility, and community building. Development shall be required to comprehensively consider and support the totality of such objectives, to ensure that is constitutes good planning and aligns with the urban design and built form principles and objectives as outlined in this Plan.*

The proposed development will significantly contribute to the housing supply and provide much needed affordable housing within the Major Transit Station Area. It will include ground floor retail and amenity space to enhance interaction between the public and private realm. The development will include amenities such as a fitness room, communal kitchen area, meeting rooms, outdoor balcony and patio spaces etc. to ensure residents have access to essential social and recreational facilities. These rooms and outdoor balcony and patio spaces promotes community within the building and improve the quality of life for residents. Since the previous submission, the landscaped open space has increased from 24.4% to 35.4%. A site specific zoning request for a reduced landscape open space is no longer required.

The tower has been designed to be compatible with surrounding uses within the MTSA and minimize potential negative impacts to neighbouring properties to the north and to the west. The six-storey podium and landscape area at grade has been enhanced to encourage interaction, pedestrian scale and assist in providing transition to the low rise residential to the south. Enhanced boulevard planting will be provided along the street frontages to help address the interface with the Albert-MacGregor Heritage Conservation District.

The proposed Official Plan Amendment includes site-specific policies to implement the proposed height and density of the revised development proposal in recognition that OPA 58 has not received final approval. The proposed Zoning By-law Amendment implements the height permissions afforded to the subject lands through OPA 58 and further establishes the maximum permitted density in accordance with Policy 3.4 (3).

Inclusionary Zoning (OPA 50)

Table 10-1 (Inclusionary Zoning Set-Aside Requirements) of the Official Plan contained in Policy 10.2.1 (17) prescribes the minimum percentage of new gross leasable residential area to be established as affordable units within all MTSAs within the City. For the Laurier-Waterloo Park MTSA, a minimum 2% of gross leasable residential area is to be set aside in new developments where building permits are issued in 2025 or 2026. This minimum percentage increases to 2-3% for new developments where building permits are issued in 2027 or 2028. In recognition of the number of zoning variances requested, the proposed amendments include a provision requiring a minimum of 4% of total units be offered as affordable housing, for a total of ten units based on an overall unit count of 231 units within the development.

These units will be affordable rental units and be rented as affordable for at least 25 years in accordance with Policy 10.1.2 (21) of the Official Plan.

The applicant is proposing that 4% of the proposed units be provided as affordable housing in accordance with the CMHC affordable housing definition (units will have rents below 30% of the median total income of all families in the subject market.

In our opinion, the proposed Official Plan Amendment and Zoning By-law Amendments conform to the overall policy direction of the Official Plan and OPA 58, City of Waterloo Official Plan and Regional Official Plan.

2.3 Rationale For the Proposed Amendments

2.3.1 Official Plan Amendment

The proposed Official Plan Amendment implements the policy direction of OPA 58 and establishes a minimum number of affordable housing units to be provided that exceeds the minimum requirements of the City's inclusionary zoning policy and regulatory framework. The increase in residential density over the original proposal is a function of both an increase in the number of studio, and two- and three-bedroom units included in the development as well as the number of additional units accommodated through increased height permissions on the subject lands. The proposed density is appropriate given the location of the subject lands within the Laurier-Waterloo MTSA and proximity to the ION station, the existing active transportation network, recreational opportunities within Waterloo Park, and commercial uses along University Avenue West. Lastly, it is noted that the proposed development represents one of the few opportunities for residential intensification within the eastern portion of the MTSA considering the majority of the lands in this area are either owned by Laurier, are characterized by small lot parcels, or are within the Albert-Macgregor Heritage Conservation District.

2.3.2 Zoning By-law Amendment

The proposed Zoning By-law Amendment implements the proposed Official Plan Amendment and establishes site-specific regulations to facilitate the revised development, as proposed. The following provides the rationale for each of the site-specific regulations included in the proposed amendment, except for height and density as they are addressed in Section 2.3.1 above.

Maximum Density:

The proposed development seeks an increase in the permitted density from the current Zoning By-law to permit a total of 425 bedrooms within 231 residential units. Table 70: Regulations- Residential Mixed Use Zone (RMU)-81 currently permits a maximum density of 750 bedrooms per hectare. The current density permitted is 110.47 bedrooms based on the net lot area and 121 bedrooms based on gross lot area.

The development proposes a total net density of 2,886 bedrooms per hectare based on the net lot area and 2,626 bedrooms per hectare based on the gross lot area. As part of OPA 58, density is no longer determined through the Official Plan for the Station Area. Instead, it serves as a test for appropriate densities within a Major Transit Station Area. Specifically, maximum residential densities may be established in the Zoning By-law, with density provisions based on considerations unique to individual sites or areas, as per Policy 3.4 (3) of the City of Waterloo Official Plan.

Through a request for a site-specific provision, the increased density should be considered appropriate for this area. The development will support the station area and is walkable to Wilfrid Laurier University, the University of Waterloo, and Uptown Waterloo. The site is well-positioned near parks, universities, amenities, and transit, making it a priority site for intensification within a Major Transit Station Area.

Minimum Provided Affordable Housing Units:

A total of 10 units are planned for affordable housing, representing 4% of the total unit count in the current development, where rents will be provided at 30% of the median total income of all families in the subject market. This number provides for more affordable dwelling units than the City's vision for inclusionary zoning.

Maximum Building Height:

The proposed building height has been planned to be increased to 30 storeys (102 metres), whereas Table 70: Regulations - Residential Mixed-Use Zone (RMU) permits a maximum of 25 storeys (81 metres). As mentioned earlier in this report OPA 58 (as adopted by council) designated the subject lands as, *High Rise, 30 storeys* as such, the applicant is requesting to increase the height permitted by

the current Zoning By-law to 30 storeys in height to meet the approved building height of the Official Plan as adopted by Council.

The increase to the building height to 30 storeys from the permitted 25 storeys results in a negligible change to the shadow impact study. The development continues to propose a point tower, and the additional tower height has been evaluated through a revised shadow impact study submitted concurrently with the resubmission. A summary of the study can be reviewed in Section 3.2 of this addendum.

Street Line Setback – Seagram Drive

The applicant is requesting site specific zoning for the streetline setback along Seagram Drive. The minimum Street Line Setback requirement as per the City of Waterloo Zoning By-law is 5.0 metres from the property line. To not hinder development potential from adjacent properties and provide for a podium and tower design that functions structurally, the architect has designed the building closer to Seagram Drive than what is permitted in the current zoning regulations.

The mass of the podium at grade and access to the parking structure is setback 4.0 metres from the new property line along Seagram Drive, while four structural support columns are located at 2.0m from the front lot line to support the cantilevered podium above.

This project is located only one block south of the Northdale Neighbourhood which is also located within the same MTSA. The Northdale Community provides for similar style of built form of high-rise development dedicated for student housing with permitted streetline setback requirements of 1.0m-3.0m and as currently constructed allow for similar type right of ways to operate at the same capacity proposed along Albert Street and Seagram Drive.

Seagram Drive – Transportation Master Plan, 2020:

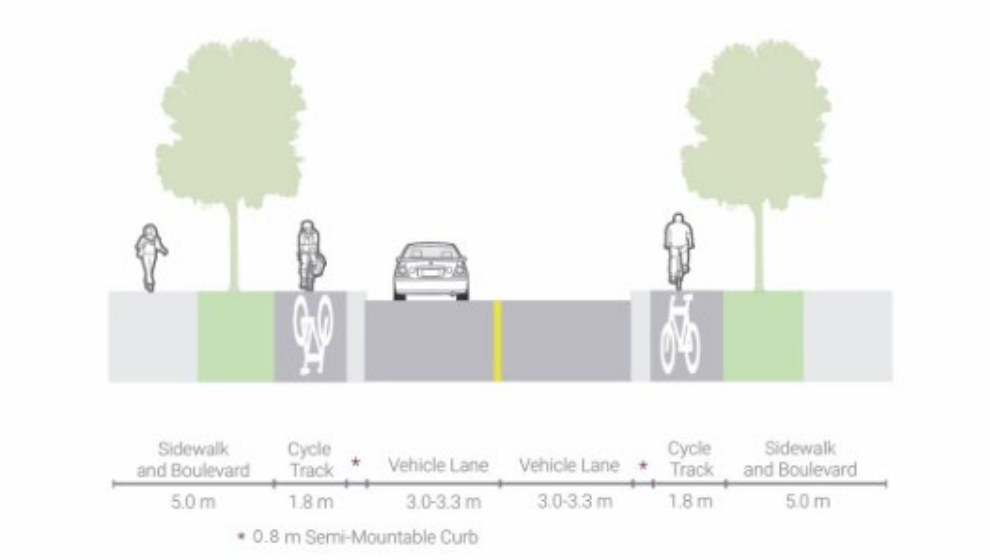
The Transportation Master Plan, 2020, identifies Seagram Drive as an Ion Route with segregated/buffered bike lanes. It also classifies Seagram Drive as a Minor Collector Road. Minor Collector Roads are designed with a right of way width of 18-20 metres in size, with a pavement width of 8-11 metres wide. Although identified as a Minor Collector Road, Table 5-2 of the Official Plan requires a 26.0 metres road allowance for Seagram Drive. This widening is 6.0 metres wider than the needs of the 2020 Transportation Master Plan, suggesting that the additional 3.0 metres being taken along Seagram Drive may not be warranted.

Included below is Figure 9.7 and Table 9.3 from the City of Waterloo Transportation Master Plan, which provides for a typical cross section of a Minor Collector Road. Generally, this road is a two-lane road with separated bike lanes raised up from a mountable curb. Beyond the bike lane is a 5.0 metre boulevard large enough to provide for landscaping/street furniture as well as a sidewalk. More specifically, the Transportation Master Plan specifies the requirement for the cross section of the Minor Collector Road:

- Sidewalk and Boulevard: 5.0m (each side)
- Cycle Track: 1.8m (each side)
- Mountable curb (semi mountable): 0.8m (each side)

- Vehicle curb lane: 3.0m -3.3m (2 lanes total)

FIGURE 9.7: MINOR COLLECTOR ROAD CONCEPTUAL CROSS-SECTION



Above: Figure 9.7 of the City of Waterloo Transportation Master Plan, 2020, confirming a typical cross section for a Minor Collector Road (Seagram Drive).

TABLE 9.3: CROSS-SECTION COMPONENTS AND REQUIRED RIGHT-OF-WAY

Road Classification	Sidewalk and Boulevard	Cycle Track	Curb	Vehicle Curb Lane	Vehicle Inside Lane
Arterial	6.0 m	With sidewalk and boulevard	0.5 m barrier	3.3 – 3.5 m	3.0 – 3.3 m
Major Collector	4.0 m	1.8 m	0.5 m semi-mountable	3.3 – 3.5 m	3.0 – 3.3 m
Minor Collector	5.0 m	1.8 m	0.8 m semi-mountable	3.0 – 3.3 m	Not provided

The City is requesting an additional 3.0 metres for the road right-of-way, which would result in a total sidewalk and boulevard width of 8.0 metres. The additional widening request appears to be based on the Station Area Planning Report, dated June 2017. This report pre-dates the more recent Transportation Master Plan from 2020.

This 2017 reporrt identified the length of Seagram Drive to Albert Street as an area targeted for improvements for access for pedestrians and cyclists and where improvements to the existing intersection could help to enhance access and safety for pedestrians and cyclists.

The cross section below was extracted from Section 3.3.4 Local Mobility Strategy from the Station Area Planning Report. It provides for a 26 metre right of way which is planned to establish sidewalks on both sides of Seagram Drive and provide a generous sidewalk. The plan encourages the City to complete the cycling connection to Laurier University from the transit station though the removal of the dedicated east bound turning lane at Albert Street, as well as the extension of bicycle lanes or use of sharrows. The report suggests that when the right of way is reconstructed that pedestrian oriented lighting be added along the length of the street and includes plans for the improvement of the intersection at Albert and Seagram by introducing new accessible, marked crossing points from the south side of Seagram Drive to the far side of Albert Street, and incorporation of zebra striping to enhance drive awareness. Finally, it suggests the need to accommodate occasional GRT bus services.

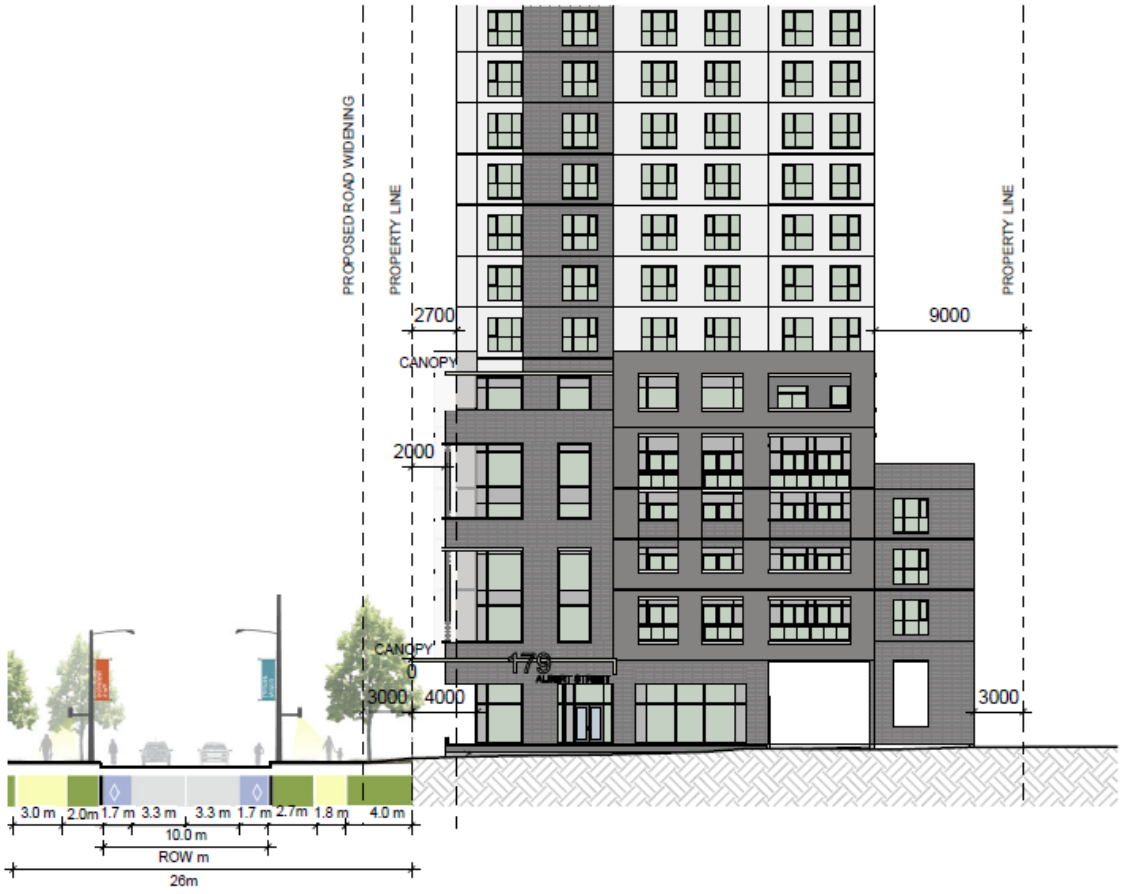
Based on the above information from the Station Area Planning Report, it appears that when road/intersection improvements are made that the left turning lane on Seagram Drive onto Albert Street is planned to be removed and more emphasis put on pedestrian and cyclist safety and priority.

The cross section below depicts the 26 metre right of way planned for Seagram Drive. As per the Transportation Master Plan, 2020, a 26 metre right of way is not typical for a minor collector road. To help visualize, the subject lands are located on the left side of the cross section. The cross section plans for 3.3 metre laneways, 1.7 metre bike lanes, a 2.7 metre boulevard with pedestrian scale lighting, a 1.8 metre sidewalk and a 4.0 metre additional boulevard to plan for large canopy trees. As overhead hydro wires are located within the current boulevard, the additional landscape area being assumed as part of a road widening will be used to enhance the pedestrian corridor with large canopy trees. If the proposed building complied with the required streetline setback, this would add another 5.0 metres to the proposed 4.0 metre landscaped boulevard.



Above: Typical Seagram Drive Cross Section from Station Area Plan, 2017. Subject lands located on left side of cross section.

Below is the scaled cross section of the Seagram Drive right of way from Station Area Plan, 2017. The cross section is shown relative to the proposed road widening to confirm that the 26.0m right of way - proposed building design, street line setback and canopy projection can fully function and be constructed to the intended vision for the Seagram Drive streetscape upgrades.



TYPICAL SEAGRAM DRIVE CROSS SECTION
SCALE: 1 : 400

Above: Proposed Podium design relative to the proposed Seagram Drive cross section as per the City of Waterloo Station Area Planning Report, 2017. The cross section provided in the Station Area Plan accounts for hydro/pedestrian scale lighting in the boulevard between the bike lane and sidewalk. The additional 3.0m road widening provides for sufficient area for large canopy trees to soften the street edge and achieve the City of Waterloo's design vision of the Seagram connection to the Waterloo Park LRT Station.

Although the applicant is not opposed to providing a 3.0 metre widening, the additional 3.0 metres being assumed by the city is already planned to be used for enhanced landscaping beyond the sidewalk and boulevard zone and will not be required for additional drive aisles/turning lanes, hydro corridors, separated bike lanes, boulevards or sidewalks.

Through consultation with City staff, it was confirmed that the intent of the additional right of way is to accommodate shade and canopy trees, helping to soften the street edge and enhance the pedestrian experience and provide a transition from the MTSA to the heritage district to the south. Along Seagram Drive, the proposed podium design includes the projection of a cantilevered canopy that offers seasonal protection and contributes to a comfortable pedestrian wind environment (refer to the Wind Study Addendum/Opinion Letter by SLR).

This 3.0 road widening exceeds the requirements outlined in the Transportation Master Plan, allowing for an expanded sidewalk and boulevard area of 8.0 metres from the building frontage to the proposed property line. This additional space helps achieve the vision for Seagram Drive as per the Station Area Plan and enables the inclusion of shade trees within the City right-of-way, further supporting the City's urban design goals for the Seagram Drive corridor.

While the proposed canopy extends to the property line, its height increases progressively westward along Seagram Drive. This variation in height creates opportunities for enhanced landscape design within the property limits, including native softscaping and decorative retaining walls that help define the transition between public and private realms.

Established Building Lines – Seagram Drive

Although the City has a vision and plan for future widening and enhancement to the Seagram Drive corridor as a connection from Wilfrid Laurier University to the LRT Station, establishing the widening down the length of the street may prove to be challenging due to the established built form that already exists along the north side of Seagram Drive. Within the block of Seagram Drive between Lester Street and Albert Street are some established multiple residential developments which are setback approximately 3.0 metres to 5.0 metres from the current right of way. If the 3.0 metre right of way were to be taken by the City of Waterloo to achieve the ultimate cross section as required by the Station Area Plan, then some of the established multiple residential developments would also be located at the zero-lot line to within 2.0 metres of the new lot line. The proposed setback for the project at 177-179 Albert Street is consistent with the built form setbacks of other multiple residential developments within the immediate block along Seagram Drive.

Architectural Projection (Canopy): 3.0m from Albert Street and 0m from Seagram Drive.

The applicant is seeking an amendment to Section 3.A.5 f) for the Architectural Projection, Class C. The by-law permits projections in the form of an architectural canopy to be located a minimum of 1.5m from the building setback for both cantilevered canopies proposed along the lot frontages above the first storey of the building.

Architectural Projection (Canopy) – Albert Street:

The applicant is seeking relief of the provision to allow an architectural projection of the canopy for a distance of 2.0m from the building façade along Albert Street.

A 3.0-metre setback is proposed to the edge of the projected (unsupported) canopy, which is intended to provide wind mitigation and improve pedestrian comfort in both the public and private

realms. This canopy projection will assist in creating a sheltered and comfortable streetscape, particularly during the various seasons.

The podium structure itself is setback 5.0 metres from the front property line to accommodate structural columns, with the podium base pushed further back to 7.0 metres. This stepped design reduces the visual mass of the building at street level and creates a more generous and welcoming transition between the public sidewalk and the private development. Structural columns to support the podium above are proposed at the 5.0 metre setback, meeting the minimum setback requirement along Albert Street (after the road widening).

The landscaping proposed along the Albert Street frontage includes a mix of grade variations, decorative retaining walls, and native softscaping materials that enhance the visual appeal and ecological value of the site. There is also adequate room to plant large canopy trees within the property line, and potentially within the City right-of-way, subject to municipal approval. These trees will contribute to a more comfortable pedestrian experience and help soften the appearance of the podium from the street.

Overall, the proposed setbacks and canopy projection are consistent with the City of Waterloo objectives for the Albert Street right of way. Furthermore, the approach is in keeping with similar developments in the Northdale community (permitting setbacks ranging from a minimum of 1.0m to 3.0m) as well as other developments along Albert Street (e.g. 197 Albert Street), thus ensuring a cohesive and context-sensitive built form along Albert Street.



SOUTH ELEVATION (ALBERT STREET)
SCALE: **1 : 400**

Above: Proposed Podium design relative to the proposed Albert Street cross section as per the City of Waterloo Transportation Master Plan, 2020. Canopy is located 3.0 metres from the proposed property line (after road widening).

Architectural Projection (Canopy) – Seagram Drive:

The applicant is seeking a zero-yard setback for the cantilevered canopy which extends to the property line after the 3.0m road widening is assumed by the City. The canopy has been extended to the lot line to provide for sufficient architectural elements to achieve proper wind mitigation for pedestrian comfort within the private and public realm.

As discussed above, the City of Waterloo will be assuming a 3.0m road widening, which will be used for the purpose of providing large shade trees along the Seagram Drive boulevard beyond the public sidewalk. The extended cantilevered canopy will only extend to the new property line and not interfere with the street trees. The buffer from the sidewalk to the new property line will provide sufficient setback (approximately 4.0m) to the canopy and will not interfere with any of the elements planned by the City for the public realm and streetscape.

Minimum Rear Yard:

The proposed podium has a rear yard setback of 4.4 metres. The applicant is requesting exceptions to the rear yard setback for some building elements that are not part of the mass of the podium wall. These include a reduction to the rear yard setback for the transformer room decorative canopy of the podium, which is setback 0 metres from the rear property line; an exemption for part of the underground parking which extends above grade at the rear of the site by approximately 1.1 metres located at 0.8m from the property line due to the grade change on the property and also to permit an encroachment of the permitted canopy to 0.8m for wind mitigation purposes. The parking structure does not extend above the defined grade line measured along the frontage of Albert Street. The applicant is seeking relief from Table 70: Regulations - Residential Mixed Use Zone (RMU) where a minimum setback of 5.0m is required.



BUILDING SECTION FROM SEAGRAM DRIVE

SCALE: **1 : 400**

Above: Cross Section through building showing rear yard setbacks and dimensions to key elements. Setback of 0.8m from rear property line to parking structure extending out of grade due to grade change across site from Albert to rear property line. Parking structure does not extend above the defined grade (as per Zoning By-law) which was measured at Albert Street frontage. A canopy extends from the podium façade 3.6m at a height of 5.2m above grade. Site specific provision for rear yard requested for the parking structure and canopy and podium façade.

The proposed Zoning By-law Amendment includes special provisions to permit the reduced setback to these portions of the building. The majority of the podium mass (approximate 80% of building face) is setback at 4.4m which provides sufficient area for a patio/terrace for the commercial use. The patio/terrace provides similar open air amenity space as a rear yard would typically provide, and in our opinion satisfies the intent of the By-law.

Given the subject lands are a corner lot and the proposed building also orients active uses along both street frontages, being a commercial unit along Seagram Drive and residential entrance and lobby along Albert Street, the westerly (rear) yard functions more as a side yard along Seagram Drive. While the adjacent apartment building along Seagram Drive is sufficiently separated (approximately 5.0 metres) from the subject lands because of the existing driveway access, it is noted that the proposed at-grade terrace above the parking structure provides an interruption in the building façade and breaks up the massing of the ground floor of the podium as it relates to the western property line.

Furthermore, considering the proposed heights of the transformer room and decorative canopy of the podium, the height of the building along the western property line, which decreases with grade changes north to south to Seagram Drive, is similar to that of a single detached dwelling as opposed to a typical multi-unit residential development.

The transformer and decorative canopy is proposed at the zero setback from the rear property line. The applicant has chosen to enclose the transformer within the building to assist in making a cohesive streetscape along Seagram Drive. Enclosing the transformer integrates the transformer seamlessly into the building design and reduces interference with potential landscape screening challenges from the public realm.

In this regard, the proposed setbacks to the transformer room, parking structure that extends above grade and ground level podium are appropriate, recognizing that the remainder of the podium from storeys two to six are setback 4.4 metres from the property line.

Minimum Podium Stepback:

The applicant is seeking a reduction in the overall tower stepback from the podium along Albert Street and Seagram Drive. The minimum stepback requirement from the podium façade according to Table 7P: Regulations - Residential Mixed Use Zone (RMU) is 3.0 metres from the front building façade. The applicant is seeking relief of this requirement to permit the Minimum Podium Stepbacks as follows:

a. Seagram Drive: 30% of tower facade located at 0.7 metre stepback and 70% of tower facade located at a 2.0 metre stepback
b. Albert Street: 40% of tower facade located at 1.0 metre stepback and 60% of tower façade located at 2.0 metre stepback

The purpose of the tower setback is to create a clear separation between the podium and the tower. From a pedestrian perspective, interaction primarily occurs at the podium levels of the building. The stepback above the 6th storey of the podium helps reduce the perceived scale of the building, maintaining an appropriate pedestrian scale within the public realm.

In addition, the extended canopy around the first floor of the building along Albert Street and Seagram Drive assist in breaking up the height of the podium and tower by creating a defined limit along the pedestrian level along both public realms.

The request or the varying façade stepbacks will allow for articulation and visual interest in the tower design as opposed to providing a standard flat and square tower design.

In our opinion, the provided tower stepbacks and the change in building materials between the podium and tower design effectively achieve this separation. This ensures that the pedestrian scale and experience are preserved along Albert Street and Seagram Drive.

Minimum Tower Separation:

Extensive consideration has been given for the location of the proposed building and tower on the subject site. The site location and constrained lot size results in a challenge related to the ultimate build out of the site to achieve the vision and densities suggested by the station area plans and the latest Official Plan updates through OPA 58. This size constraint is further exacerbated by the extensive road widenings required by the City, particularly along Seagram Drive.

With the size of the site being relatively small, despite best efforts, the applicant was unable to consolidate with neighbouring properties. The current property configuration has frontage onto two streets requiring road right of ways (Seagram Drive requiring a 3.0 metre widening and Albert Street requiring a 0.7 metre widening). Cumulatively the widenings reduce the overall lot size from 1619 sq.m. to 1473 sq.m., presenting further challenges to achieve height and density targets permitted for the site.

The applicant is requesting a minimum tower separation of 9.0 metres to the north property line and 7.8 metres to the west property line. This represents a proposed reduction from the Zoning by-law requirements of 2.0 metre and 3.2 metres, respectively. From the previous proposal, the tower has been pulled to the south of the property. The purpose of moving the tower away from the north property line is to ensure that adequate separation can be made between the proposed tower to the property line and not hinder any development opportunities for the landowner to the north.

After consulting with the wind consultant, it was confirmed that the difference in wind levels between the required 11.0 metre tower separation and the proposed 9.0-metre separation is negligible. Additionally, the 6.0 metre podium stepback on the west side of the podium tower provides sufficient space to address wind concerns along with additional landscape opportunities for further mitigation.

The impacts from the shadow from the podium would continue regardless of the tower height or separation.

<u>Tower Separation vs. Development Opportunities to Wilfrid Laurier University:</u>

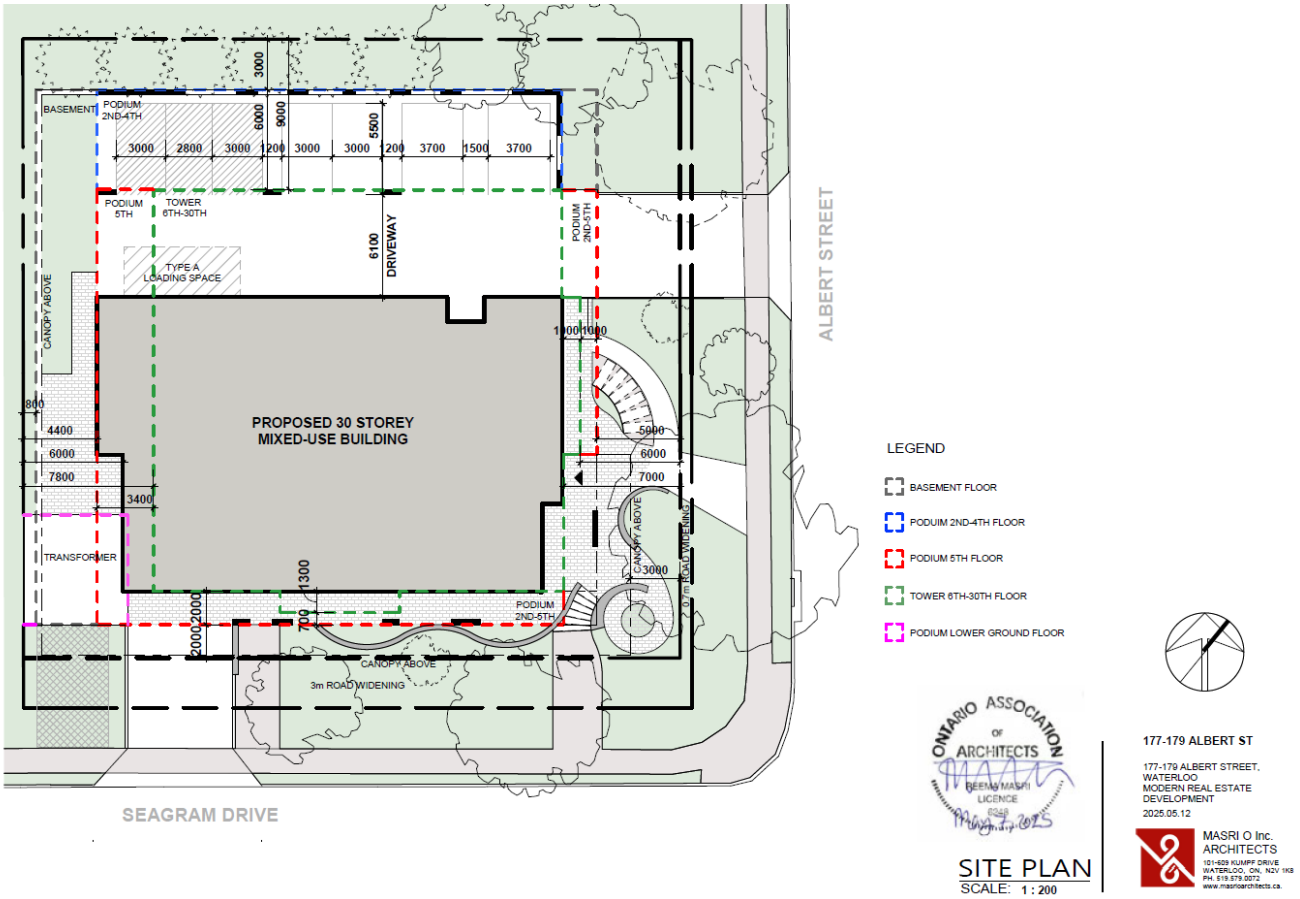
The consultant team consulted with Wilfrid Laurier University (WLU) representatives to evaluate options for the tower location and separation from the 'as of right' zoning regulations for a full build out of a 30 storey tower on the lands owned by WLU immediately to the north of the subject lands. **Figure 7,** demonstrates the consideration for the potential build out of the lands to the north with the assumption that the tower and podium will be pulled to the street frontage along Albert Street.

In the example, the proposed tower as designed by the architect has been located on the subject lands. On the WLU lands to north (assuming maximum build out), the land owner could plan for a 6 storey podium meeting minimum setbacks from all property lines, plus a 30 storey tower (as per OPA 58), stepped back at 3.0m along with 11m tower separation requirements on either side. The City of Waterloo regulates the length of the tower floor plate to 40 metres. This example demonstrates what could be constructed (as of right) using the UC-81 zoning regulations along with the City of Waterloo's recommended tower separation of 11.0m to the property line.

The example above demonstrates that the proposed reduction to the tower separation will not limit or constrain Wilfrid Laurier University from the potential to maximize height and density on their site for future development.

The applicant is seeking a tower separation to the west property line of 7.8 metres. This setback is to a site that currently houses a multiple dwelling that is three storeys in height. It is a single lot owned by others and given the current land holdings by Wilfrid Laurier University and the adjacent property owner, there are minimal opportunities for this site to develop with a tower due to the constrained lot size and tower separation requirements for lots on the sides and rear lot of the property. The 7.8m setback for the tower separation along the west property line is sufficient as it will not impede development opportunities to the west.

The Tower location is shown as the green dashed line on the plan below.



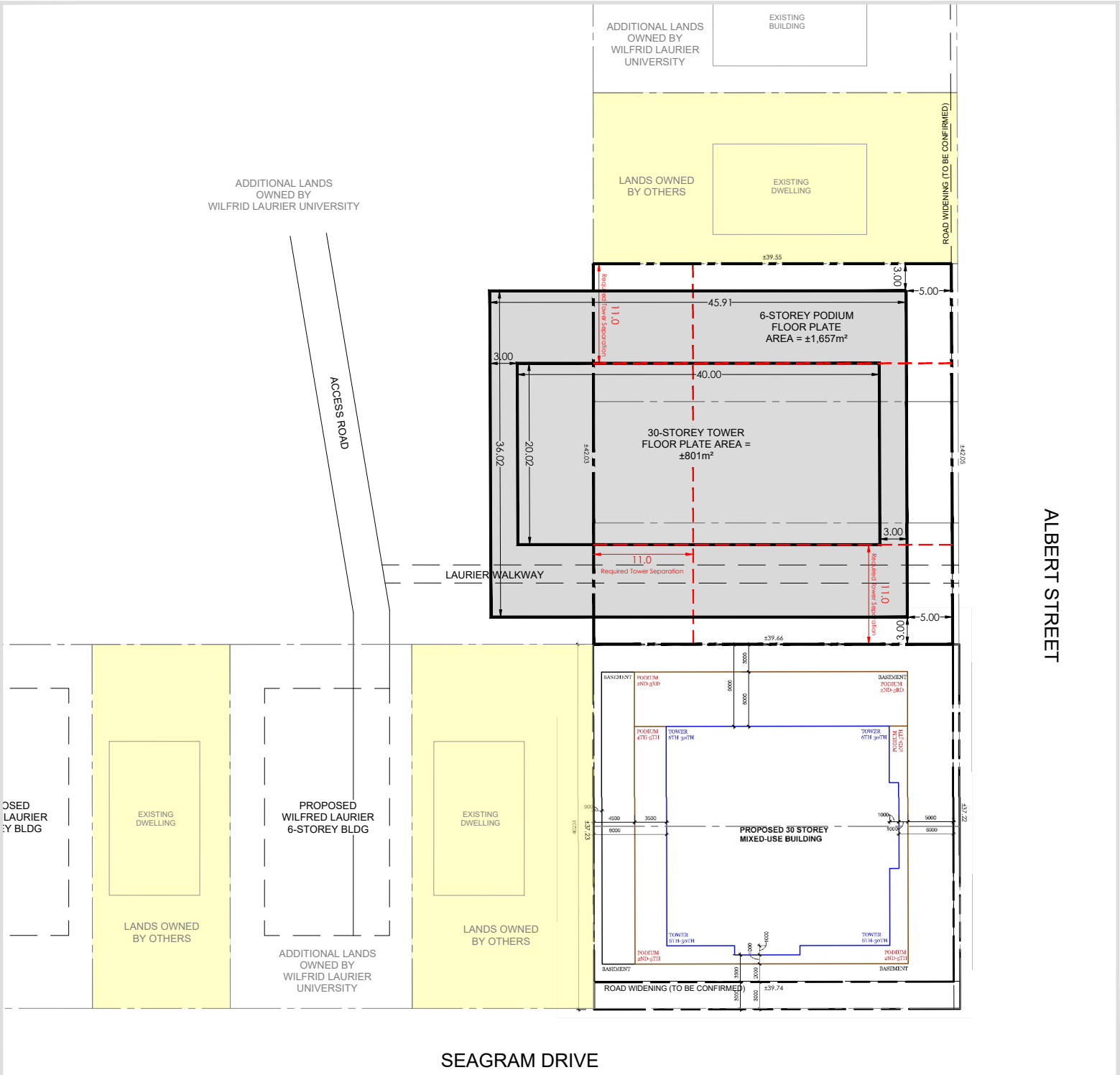


Figure 7 Separation Distance As-Of - Right

LEGEND

- Subject Lands
- Tower Separation Setback
- Lands Owned By Others (Non-Laurier)

Date: May 7, 2025

Scale: 1:600

File: 15200F

Drawn: CAC

north

K:\15200F 177-179 Albert Street, Waterloo\RPT\SeparationDistance_7May2025.dwg

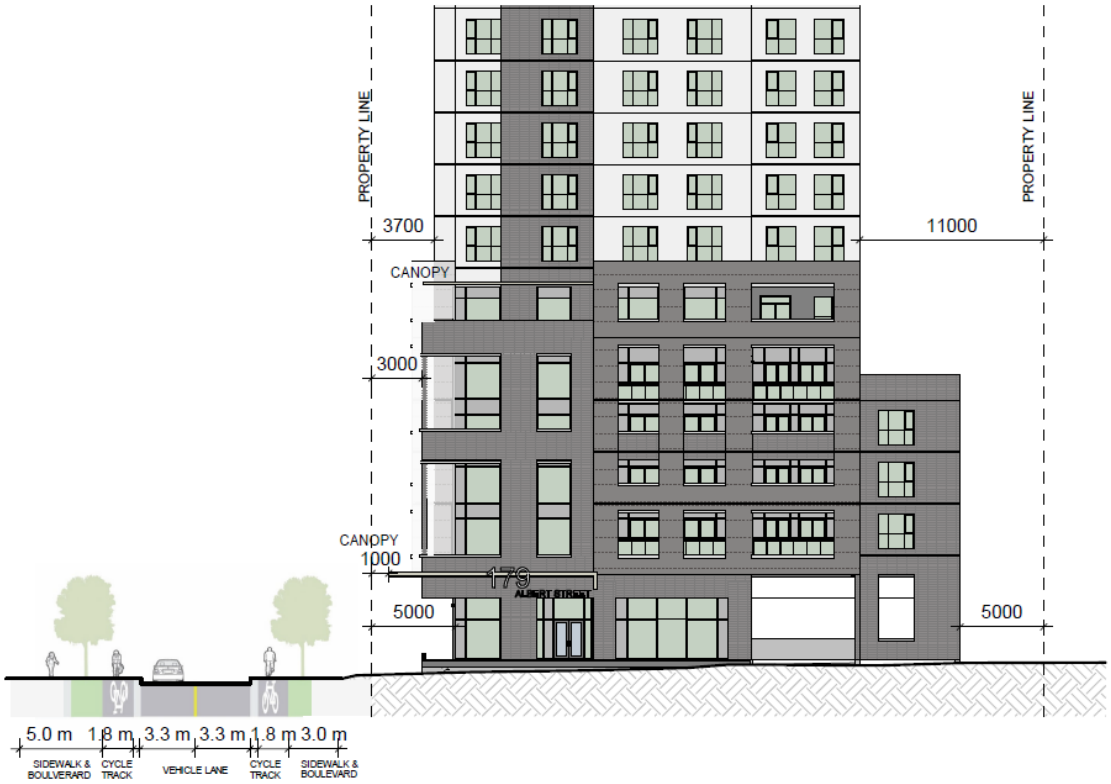
177-179 Albert St
City of Waterloo
Regional Municipality of Waterloo

Source:
Masri O Inc. Architects - May 2, 2025

MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
200-540 BINGEMANS CENTRE DR. KITCHENER, ON, N2B 3X9
P: 519.576.3650 F: 519.576.0121 | WWW.MHBCPLAN.COM

Impact of Road Widening on Tower Separation:

Below is a scaled elevation of the proposed podium using the current 2020 Transportation Master Plan cross section for Seagram Drive with a, 18- 20 metre road width. The Transportation Master Plan confirms that the minor corridor only requires the 18- 20 metre road width, therefore if the road widening was not required, the building as a whole could be shifted and the tower separation could increase to 11.0m from the north property line and the base of the podium would be setback 5.0m from the current property line.



EAST ELEVATION
SCALE: **1 : 400**

Above: Proposed Podium design relative to the proposed Seagram Drive cross section as per the City of Waterloo Transportation Master Plan, 2020. The Transportation Master Plan does not show the 3.0m widening as a requirement and confirms there is sufficient space within the corridor. If the City of Waterloo did not request the road widening an 11.0m tower separation to the north property line could be achieved, and still provide for 5.0m setback to the podium base at grade.

Section 5.4.7 (5) of the Official Plan provides direction for the Designated Road Allowance Policy for Widenings. This policy states that *notwithstanding policy 5.4.7(3), the City may modify the extent of the widening to be dedicated where: (a) it is not feasible or desirable (as determined by the City) to widen an existing road allowance to the widths set out in Table 5-2 due to significant adverse impacts on: i) existing land uses or iii) an existing streetscape.*

The corridor width as identified in the Official Plan is listed as 26.0m, which aligns with the 2017 Station Area Planning Report. However, as previously noted, the more recently approved the 2020 Transportation Master Plan does not require this width for a minor collector road.

Podium Height

The proposed podium is six storeys in height along street frontages and four storeys in height along interior and rear property lines, except for the portion of the podium within 0.8 metres of the western property line that accommodates structured parking spaces.

The structured parking is located below the grade on site (as per the City of Waterloo Zoning By-law definition for grade), however due to a change in the grade from Albert Street, towards the west property line some of the structured parking extends above grade by approximately 1.1 metres.

The measurement of building height as defined by the zoning by-law is 'the vertical distance from the finished ground level abutting the Front Building Façade, measured as the average of 5 points equally spaced apart adjacent to the entire front building façade to the highest point of a roof's surface' (for the top of the podium height).

For the purpose of our zoning review and site specific request, the zoning by-law defines structured parking as 'a building structure or part there of, used primarily for the parking of motor vehicles. It includes underground parking, parking spaces entirely or partially beneath a building, excluding cantilevered shade or solar structures'.

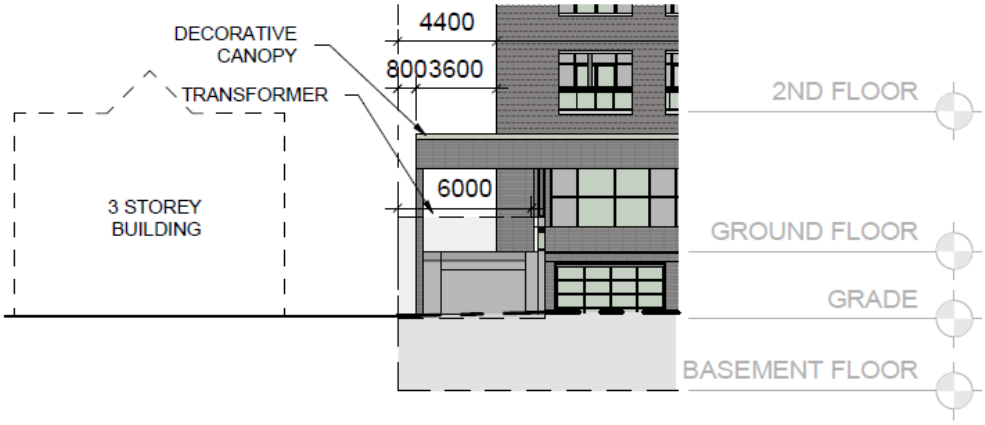
The zoning by-law defines podium as 'the base of a building above grade, up to six storeys in height, extending outwards from the Tower as identifiable projecting element to articulate the building in accordance with the building stepback provisions in the by-law.'

Based on the above definitions the structured parking extending above grade in the rear of the property has not been interpreted as part of the podium height. The grade has been interpreted as the grade at the front of the subject lands with all building elements below this grade as being considered as 'below grade'.

As such, a special provision is requested to permit a minimum podium height of 5.2 metres for those portions of a podium that accommodate the transformer room and decorative canopy and an exemption for the parking structure extending above grade, whereas a minimum height of 10.5 metres is required in the RMU-81 zone.

The remainder of the podium meets the minimum requirements of the Zoning By-law, with the exception of the transformer room and decorative canopy and has been designed to define the base of the building from both Seagram Drive and Albert Street. In this regard, a reduced podium height along the western façade of the building does not negatively affect the general urban design intent of a podium.

As mentioned above, the enclosed transformer room has been added to the podium to screen the transformer, create a uniform and consistent streetscape along Seagram Drive and avoid challenging landscaping requirements which could hinder access to the maintenance of the transformer.



SOUTH ELEVATION FROM SEAGRAM DRIVE

SCALE: **1 : 400**

Above: Dimensioned elevation of transformer room, showing podium height request of 5.2m above grade for part of transformer room and decorative canopy above.

3.0 Summary of Revised Technical Studies

3.1 Wind Opinion Letter:

SLR has provided an Addendum Letter in response to the revised building design for Wind Comfort at 177-179 Albert Street. This Addendum letter is to be included as part of the Pedestrian Wind Assessment – 177-179 Albert Street, dated October 21, 2024.

This letter has been submitted concurrently with the revised submission materials and outlines the major changes to the massing of the tower and podium in comparison to the original drawings evaluated in October 2024.

The letter confirms that the study area extends approximately 150 metres from the building in all directions and considers the existing surroundings within a 500-metre radius. The suggests that the proposed development has changed minimally since the qualitative pedestrian wind assessment in October 2024 and confirms the results described in this report remain applicable.

To improve wind conditions, the opinion letter recommends the design team consider the following mitigation as the design progresses:

- The inclusion of wind mitigation features at the northeast corner of the building to address the safety concerns. These could include: a tall fence at northeast corner directed north to the property line; individual wind screens at grade at the northeast corner, which could be incorporated into landscaping; a wrap-around canopy at the northeast corner; 50% porous screens within the facade cutouts along the west, north and east facades of the surface parking area.
- Enlarge the canopy that currently wraps around the southeast corner of the building. It is recommended that the canopy protrude a minimum of 3 m beyond the building massing above both to the east and to the south. Alternatively, incorporate standalone horizontal features at the southeast corner of the building, to disrupt the downwashing wind flows from the southwest.
- Consider the inclusion of vertical wind mitigation features at the southeast corner of the property. These features would be considerate of vehicular sight lines, and other safety concerns.

SLR will work with the design team to develop and assess appropriate wind control features to improve the windy conditions identified, as the design progresses to the Site Plan Control (SPC) application stage.

Also, with regards to wind safety, exceedances are predicted along the north and south facades of the proposed building, per the October 2024 report. Note, it is SLR's experience that the qualitative approach utilized for the initial analysis can skew conservative with regards to safety concerns. Hence, we strongly recommend confirming these wind conditions through a quantitative wind tunnel analysis during the SPC stage.

3.2 Shadow Impact Study

An updated Shadow Impact Study has been submitted concurrently with the updated submission package to reflect the changes to the podium and tower design. The design of the proposed development continues as a point tower on top of a podium which will cast very similar shadows to those originally assessed during the first submission (proposing a point tower of 25 storeys in height).

Spring (March 21):
In spring, morning shadows are primarily cast to the north and east of the site, towards sites that are currently vacant or house single detached uses. Just before 10:00 AM, the building briefly shades the residential yards of neighboring properties to the north. As the afternoon progresses, the shadows extend across the Wilfrid Laurier campus. From 4:00 PM onward, the sun weakens and sets quickly, resulting in long shadows that stretch onto neighboring properties for a short duration. The sidewalks to the east, opposite the site, remain mostly sunny throughout the day due to the tower's narrow massing. The narrow property directly north of the site remains in shadow from morning until mid-afternoon.

Summer (June 21):
During summer, shadows are shorter due to the higher sun angle. In the morning, they briefly shade properties to the north and west. By the afternoon, shadows are mostly confined to the roadway and extend slightly into the Laurier Campus. Around 4:00 PM, shadows begin to extend further to the south east and get longer towards the sunset.

Fall (September 21):
The shadows in the fall cast similarly to those in the spring time. In fall, around 10:00 AM, the building briefly shades the residential yards to the north and moves towards the Laurier campus. From 4:00 PM onward, the sun sets quickly, producing long shadows that stretch onto neighboring properties for a short time. The sidewalks to the east remain mostly in sunlight throughout the day, thanks to the narrow design of the tower. The adjacent property to the north stays in shadow from morning until mid-afternoon.

Winter (December 21):
Winter brings longer shadows due to the low angle of the sun. Between 9:00 and 10:00 AM, the building shades the residential yards to the north. However, by noon, most of these properties receive sunlight. Shortly after, shadows begin to stretch into neighboring properties to the east and south.

The conclusions of the original shadow study remain consistent with the above shadow analysis:

The findings of this study demonstrate that the Urban Design Manual requirements for Shadow Impact Assessment can be achieved for properties within the surrounding neighbourhood apart from

181 Albert Street (the adjacent property to the north of the site). It is important to recognize that if the site were developed with only a six storey podium (which would not require a Shadow Impact Assessment) then the same shadow impacts to the site directly to the north would have the same shadow impacts exceeding the intervals provided in the Urban Design Guidelines.

The criteria as required by the Urban Design Manual has been met for the remaining surrounding sites which includes:

- At least 50% or more of any property should not be shaded for more than two interval times (a four hour equivalency); or,
- As a principle, at least 50% of any property should be in full sun for at least two interval times (a four hour equivalency)

The following values from the Terms of Reference: Sun/Shadow Analysis are also achieved:

- Public Plazas, parks and open spaces: no new net shadow between 10am and 4pm during the September evaluation period
- Public Sidewalks: Minimum of 50% sun coverage on opposite sidewalk between 9am and 6pm during March through September evaluation dates
- Residential Yards: Minimum of 3 continuous hour of sun during March and September evaluation dates.

4.0 Conclusions

The project team has carefully considered feedback from the City of Waterloo and the public, resulting in a revised plan that aligns with the character of a Major Transit Station Area and is consistent with similar developments in the nearby Northdale neighbourhood.

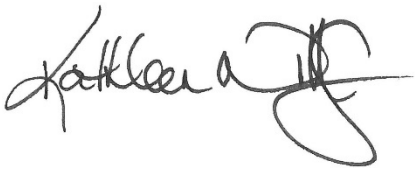
The updated design maximizes the development potential of the site while addressing potential constraints on adjacent properties. The proposed Official Plan Amendment for height and density aligns with OPA 50 and 58, as adopted by Council.

The accompanying Zoning By-law Amendment supports the implementation of these Official Plan policies, the Regional Official Plan and the Provincial Planning Statement. It is appropriate for the Major Transit Station Area context and ensures that surrounding properties can be developed without limitations imposed by the proposed design. Additionally, it supports the City of Waterloo's vision for a cohesive streetscape connection between Wilfrid Laurier University and the Waterloo Park LRT Station.

Respectfully submitted,

MHBC





Pierre Chauvin MA, MCIP, RPP
Partner

Kate Wills, BES, MCIP, RPP
Associate

A

Appendix A: Response Matrix

MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

May 22, 2025

Max Kerrigan, BES, MLA, MCIP, RPP
Integrated Planning & Public Works
City of Waterloo
100 Regina Street South
Waterloo, ON N2J 4A8

Dear Mr. Kerrigan:

RE: 177 – 179 Albert Street, Waterloo
Official Plan Amendment No. 52 & Zoning By-law Amendment (Z-24-03)
Response to Post-Circulation Comments
OUR FILE: 15200F

On behalf of our client, 14688210 Canada Inc., and together with Masri O Architects and other members of the project team, we have prepared the following comment matrix to summarize how the Post- Circulation Comments have been addressed through our current resubmission.

The following comments were received in response to our original application for Official Plan Amendment and Zoning By-law Amendment:

1. Post Circulation Comments – prepared by the City of Waterloo, dated March 8, 2024
2. Post Circulation Comments (Submission 1), Prepared by the Region of Waterloo, dated February 28, 2024
3. Peer Review – Noise, prepared by RWDI, dated February 27, 2024

Additionally, the project team received Post Circulation Comments for Submission 2. A separate response table is provided below to address the comments received from the second submission:

1. Submission 2, Post Circulation Comments, compiled by City of Waterloo, dated February 27, 2025

#	Comment	Response
City of Waterloo – Post Circulation Comments		
1.0 Planning Comments		
1.1.2 Specific Provision Area		
	Planning staff are of the opinion that Schedule A6a (SPA 20I) shall remain on the subject lands because the intent that these lands can also be used for academic purposes is still	The owner does not object, though notes that academic uses are not proposed at this time.

	relevant. This SPA enables the incorporation of academic-related uses over time as the community evolves or market needs desire. For example, the building could evolve in the future to accommodate formal student residences owned/operated by a post-secondary institution. Furthermore, the subject lands are very much still connected to the surrounding academic lands from a spatial/geographic perspective, and the demographic of future residents may largely be comprised of students (as suggested by the Applicant).	
	It is Planning staff's preference that the lands be dually designated SPA 20/20I (existing) and SPA XX (proposed) to accommodate the increased density. Maintaining the Academic designation does not preclude the construction of multi-residential in line with the Mixed-Use High Density Residential designation.	Noted
1.1.3 Height & Density		
	Section 12.3.1 (Height/Density Bonusing) of the Official Plan provides a framework for Council to authorize increases in height and/or density beyond what is currently permitted in exchange for facilities, services or matters, in accordance with the former Section 37 (Bonusing) of the Planning Act. While Section 37 is no longer in effect, Planning staff are of the opinion that requests for additional height and/or density in exceedance of the Official Plan should still be reviewed against the bonusing criteria set out in the Official Plan. As such, staff requested that the Applicant demonstrate compliance with the criteria in section 12.3.1, as well as demonstrate how the proposed increase provides a benefit to the surrounding neighbourhood or broader community (e.g., providing affordable housing or larger family-size units). The Applicant submitted rationale in their PJR that addresses the policies of 12.3.1 of the Official Plan, and staff offer further comments in Table 1 below.	Acknowledged
	Planning staff do not object to the increased residential density in this instance, to permit an additional 51 bedrooms.	Please refer to the revised plans. We acknowledge staff support. The owner has revised the plans in consideration of a

		number of factors, including efficiency of the original design, the size of the units, the road widening requirement and revisions to how parking is regulated in Major Transit Station Areas. The Lot Area has been reduced as a result of the two road widening conveyances – one on Albert St and one on Seagram Dr. The building's height has been increased from 25 to 30 storeys and the number of 2 bedrooms units has increased. The development now also includes 3 bedroom units. As a result, the total number of units has increased from 146 to 231 and the total number of bedrooms has increased from 172 to 425. The resulting density is now 2,887 bedrooms per hectare. The size of the tower has increased from 463 square metres to 578 square metres, which is still well below the permitted maximum (1,000 square metres). We also note that the development includes ground floor commercial oriented to both streets, including a spill out terrace. There have been only minor adjustments to the overall massing, while the articulation of the ground floor, the defined podium and the narrow tower all contribute to a strong public realm and pedestrian experience.
	Table 1: Assessment of Section 12.3.1 Criteria **12.3.1 Height/Density Bonusing** / **Community Planning comments** *(2) Authorized increases in height and/or density will be used as a tool to support the City's policy objectives within the Official Plan. The potential for authorized increases in height and/or density will apply to lands which, at the time of application, satisfy the following criteria:* *(a) Is located within a designated Node or Corridor;* — Yes, located in a Major Corridor (Schedule 'B') *(b) Is well served by existing or planned transit.* — Yes, located in the Laurier-Waterloo Park Station Area (Schedule 'J5')	As you are aware, as a result of changes to the Planning Act, minimum parking regulations no longer apply. While the building height increased by 5 storeys, the massing remains a point tower situated on a defined podium. Particular emphasis has been placed on the street facing facades. The development has also been revised to include ground floor commercial, which could serve surrounding residents, students going to and from WLU and those using the nearby ION LRT Station. In our opinion, the inclusion of the commercial use is a benefit to the community.

	(6) In all cases, appropriate development review processes will be utilized to ensure: *(a) The site is suitable for the proposed density and/or height in terms of parking, landscaping, and other site-specific requirements;* *(b) 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* *(c) 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 number of variances to the zoning requirements are being requested: minimum parking, landscaped open space and tower separation. Development Planning staff will need to satisfy themselves that the requested relief is suitable for the site and increased density. Refer to 1.5 Parking comments below. The proposed increased residential density is contained within the permitted building height. The lands to the north and east are also designated for high density and have seen considerable growth through multi-storey buildings. Lands to the south are designated for low-rise residential and within the MacGregor-Albert Heritage Conservation District – refer to 1.6 Urban Design and 3.0 Heritage Planning comments below. A Transportation & Parking Study and Functional Servicing Report have been submitted in support of the application. Development Planning, Engineering Services and Transportation Services staff will need to satisfy themselves that the proposal is appropriate for the subject lands and surrounding lands.	Further, the broadening of the unit types, including three-bedroom units are also a benefit to the community and will provide a range of unit sizes for residents looking to live close to transit, Waterloo Park and the two universities.
1.1.5 Parking		
	In conjunction with the general urban design policies of the Official Plan, parking within Station Areas shall be designed and organized to not detract from the public realm or mobility and should feature a high level of building design for parking structures in public view (policy 3.11.4(9)). As mentioned above, the proposed vehicular parking is mostly screened / hidden at the rear or underground. Similarly, the proposed locations of the amenity space, bicycle parking and landscape areas promote actives uses on the ground floor and help enhance the pedestrian realm (notwithstanding the proposed reduction in the landscaped open space zoning requirement, which is discouraged by Planning staff).	Per above, there are no minimum parking requirements. Furthermore, the development locates all of the proposed parking within a structure to hide it from view to the extent possible.
1.1.6 Urban Design		
	All residential developments shall be consistent with the City's urban design objectives and policies as set out in the Official Plan and supporting implementation documents. Planning staff are generally satisfied that the Applicant has demonstrated compliance with the urban design polices as outlined in sections 3.11.1 (General Urban Design Policies), 3.11.2 (Urban Design within Nodes and Corridors), and 3.11.4 (Urban Design within Station Areas) of the Official Plan, via the submitted Urban Design Brief (prepared by MHBC, dated November 2023). Planning staff encourage the Applicant to	Acknowledged. While the design has been refined since the initial submission, the refinements all represent positive design measures, including activation of the ground floor, increased tower separation, addition of cantelievered canopies to mitigate wind, change in building colours to address Wilfrid Laurier University concerns. The ground floor level has been setback further from the podium with a canopy above to provide shade and protection from various season elements. Podium has been designed to step back from neighbouring properties.

	continue to refer to these importance policies at the detailed design phase.	
1.1.7 Road Widenings		
	As per Schedule 'G' (Road Allowances) of the Official Plan, Albert Street has a designated road allowance of 23.0 metres and Seagram Drive has a designated road allowance of 26.0 metres. The Applicant was advised at the pre-consultation stage that a road widening may be required to be dedicated to the City of Waterloo, and Transportation staff has indicated that widenings will be required (detailed in Section 3.0).	The road widening along both streets is shown on the site plan. There is sufficient space between the building and new lot line for landscaping, including trees. Further, the potential future redesign of Seagram Dr, as provided by City staff, will still allow for trees between the relocated sidewalk and building. Applicant is willing to enhance the landscaping within the City's boulevard (subject to City approval) to further "soften" the interface with the Albert McGregor neighbourhood and enhance the pedestrian realm.
	As such, associated zoning relief will be required. Please provide a draft reference plan to reflect this requirement, and update drawings and data charts accordingly for consideration.	A Draft Reference Plan will be provided through the site plan approval process. The widenings have been reflected on the updated site plan. A reduced setback is not proposed along Albert St, even with the widening. A reduced setback along Seagram Dr is required as the conveyance is substantial. As the site plan indicated, there is a minimum of 2 metres from the post-widening lot line and the support columns, while the majority of the building is set back a further 4 metres. Canopies have been added to provide for pedestrian comfort and wind protection. These canopies are cantilevered and site specific zoning has been requested for the projections of the canopy into the front and flankage yards. The articulated façade facing Seagram, the ability to provide landscaping and active spaces and the greater setback afforded for the majority of the façade all contribute to a pedestrian oriented public/private realm interface.
1.1.8 Environmental Policy Comments		
	The Energy Strategy presents various measures that could be incorporated into the proposed development to improve its energy and carbon performance. The applicant is encouraged to continue to pursue these and	Noted – the details will be considered through the site plan and building permit processes.

	other measures in order to optimize energy efficiency, reduce greenhouse gas emissions, and increase climate resilience. This could include enhancing the energy performance of the proposed building, striving towards a near-zero emissions level of performance, incorporating low carbon heating and cooling systems and on-site renewables, identifying embodied carbon reduction strategies, and improving building resilience through increased thermal resistance, adaptable building systems, and back-up power systems that could provide 72 hours of support for hot and cold water, elevator service, space heating, lighting, and receptacle power.	
	The properties are located within the area covered by the Grand River Source Protection Plan. A Section 59 Notice will be required at each stage of the development process. The applicant can continue to go to taps.regionofwaterloo.ca to complete a questionnaire to confirm what source protection-related activities are regulated on the properties through the Grand River Source Protection Plan and to obtain the required Section 59 Notices.	An updated Risk Management Plan was prepared and completed with the Region for the OPA and ZBA process.A copy has been included as part of this resubmission as well as a copy of the Provisional Risk Management Plan.
1.1.9 Heritage Planning Comments		
	Planning staff do not object to the Z-24-03 and OPA 52 application from a heritage perspective.	Noted.
2.0 Landscape & Public Realm		
1	Please note that all current Site Plan, Subdivision and Capital Project applications and development processes have been compiled into the recently implemented City of Waterloo Comprehensive Engineering and Landscape Manual (CELM). Please visit the CELM for all standard guidance, standards and requirements. All forthcoming development applications shall meet the requirements/follow the processes set out in the CELM.	Noted. Manual to be considered through future site plan application.

2	Prior to Site Plan Approval, all existing shared boundary trees and trees on adjacent properties proposed to be removed shall have documented approval in the form of a Letter of Consent which indicates that the adjacent property owner(s) are aware of the proposal and the potential harm to existing vegetation.	Noted. The required Letters of Consent will be provided prior to Site Plan Approval.
3	All impacts to/removal of City-owned trees or trees with shared ownership with the City shall be in accordance with the City Tree Bylaw (No. 2014-078). Trees are noted to be city-owned within the right-of-way of Albert Street and Seagram Drive.	Noted.
4	Provide a landscape design that will enhance and strengthen the streetscape quality along Albert Street and Seagram Drive including but not limited to street trees, enhanced planting and paving, site furnishings, etc. It appears that overhead hydro along Albert Street and Seagram Drive will restrict the provision of landscaping and street trees. Potential conflicts should be reviewed in order to maximize tree planting across the site and help promote a pedestrian scale of the building. Ensure trees will be possible that meet Enova Power's acceptance for location and size.	Noted. Potential conflicts between trees and the overhead hydro lines along both street frontages will be reviewed as part of Site Plan Approval. The building and landscape design do represent a pedestrian friendly design. Where possible, trees will be included. We note that a Landscape Plan is required through the future Site Plan application and will be provided and the applicant is committed to provide enhanced landscaping along the Seagram frontage.
5	Tree canopy coverage to break up the impervious space with soft landscaping, and increasing tree canopy coverage over the site to reduce urban heat island effect must be incorporated into the site design early on.	We understand this to be a general comment. The public interface appropriately balances soft and hardscaping.
6	The City recommends replacement rate of trees to be removed is at a ratio of 2:1. The applicant is encouraged to maximize tree planting wherever possible on site. Per the objectives outlined in Section 8.2.9 (2) of the City's Official Plan, compensation should consider tree replacements with the intent of maintaining/increasing canopy coverage across the City. Staff are concerned that with reduced Landscaped Open Space and reduced landscape buffer, tree canopy coverage will decrease.	The Conceptual Landscape Plan illustrates where trees are proposed. There is no required landscape buffer, as the lands do not abut low-rise residential lands. The design plans for new trees along the public realm, recognizing that a high-rise building is a different built form than the existing detached low-rise buildings.

7	The applicant is seeking a reduction in the required Landscaped Open Space (LOS) from 30% to 24%. We understand from the submission material that the proposed landscaping is focused primarily on areas that will contribute to an enhanced public realm, which is appreciated. Please clarify which areas have been included in the LOS calculation, as it appears that 24% has not been provided. For example, it appears that the space above underground parking with steep slopes on the project north portion part of the site has been included (it is hatched green) and this area is not permitted to count toward LOS. It also appears that areas outside of the property boundary into the public right-of-way have been included. Clear and accurate calculations will be required before LOS reduction is considered by staff.	The revised design provides for a 35.4% landscape area, whereas 30% is required. Adequate landscape area has been provided on the revised design.
8	We understand from the submission material that the requested LOS reduction is due to grading constraints on site that would limit landscaping opportunities along the west side of the site. Can the adjacent retaining wall be removed and replaced to make the most of the space between the two properties? The narrow strip of approximately 0.22m between parking and existing adjacent retaining wall is very limited. Is there opportunity to acquire and incorporate 80 Seagram Drive into the development plans? Buffering of headlight glare from vehicles in surface parking shall be considered.	This would require cooperation from the adjacent landowner and the regrading of their lands abutting their driveway. Adequate landscape open space is required.
9	Fencing should be decorative wood fence, 1.8m height and using 150mm x 150mm posts. Provide location information of all fences proposed on site and where required, information on how existing trees will be protected during fence installation.	This is a site plan detail. This information will be provided as part of the site plan application.
10	The grading plan indicates 3:1 slopes within north portion of the property. As per Table V5-1, Lot Grading & Drainage Criteria in Volume 5 of the City's Comprehensive Engineering and Landscape Manual (CELM), the maximum embankment slope is 4:1.	This will be explored further through the site plan approval process.

	The City may consider some small areas at a maximum of 3:1. Please explore including a retaining wall that would reduce the steep grades and potentially allow for tree planting within this area.	
11	Although final detail of the rooftop area are noted to be advanced through the Site Plan Approval Landscape Plans, a structural engineer should be involved with site plan development to ensure the podium is designed to provide structural support for adequate soil volumes for long term tree and shrub growth. As shown in the Urban Design guidelines, landscaping such as trees, shrubs, perennials, etc., are expected and will greatly enhance this rooftop amenity space.	This will be considered through more detailed building design, including whether planters will be used on the rooftop amenity area.
12	Incorporate recommendations from the wind study through design, including for the roof terrace amenity space.	The recommendations of the wind study will be incorporated into the plans that form part of the site plan application. The wind study has been updated to reflect the revised design.
13	Further details will be required during the Site Plan Application process for review and acceptance from Development Engineering landscape staff.	Noted.
3.0 Transportation Impact Study		
1	If the scope of the application changes an updated transportation impact study may be required.	Noted. The number of parking spaces has been reduced to 37 spaces.
2	Staff have reviewed the transportation impact study provided. There are no warranted improvements as a result of this development.	Noted.
3	The official plan designates Seagram Drive as 26 metres. The current right-of-way along Seagram Drive is 20 metres. A widening is required and should be confirmed by an Ontario Land Surveyor.	Noted – the site plan has been revised to show the required 3 m road widening, however the Transportation Master Plan from 2020 (prepared after the Station Area Plan, 2017), only requires a 20 right of way..
4	The official plan designates Albert Street as 23 metres. The current right-of-way along Albert Street is 22.3 metres. A widening is required and should be confirmed by an Ontario Land Surveyor.	The widening will be confirmed by a surveyor when they prepare the Reference Plan through the site plan approval process. The approximate 0.7 m widening is shown on the Plan.
5	The daylight triangle at the intersection of Albert Street and Seagram Drive shall be conveyed to the City.	We understand, based on subsequent discussions, that a daylight triangle conveyance is not required.

4.0 Engineering Comments		
Development Engineering		
1	City of Waterloo's Development Engineering Manual has been superseded by the Council approved Comprehensive Engineering and Landscape Manual (CELM) located: https://www.waterloo.ca/en/government/development-engineering-manual.aspx	Noted.
2	Terms of Reference for documents required to be submitted must be followed. Please refer to the City's Terms of reference for development applications page found at: LINK Checklists for these documents found within the Terms of Reference (i.e. FSR, SWM Report) should be submitted with each submission. If a combined Functional Servicing Report and Stormwater Management Report is submitted, the combined report must meet the requirements of each separate report as indicated by the respective Terms of Reference Documents.	Noted.
3	Section 5.2 of the Stormwater Volume Criteria and Targets in the SWM-MP, the site must target Enhanced-Level 1 protection which equates to the reduction of average long-term annual load of suspended sediment by 80% or greater.	Noted
4	A sanitary flow rate of 3.35 l/sec has been presented as an anticipated flow rate for the proposed development. It was also assumed in the report that the sanitary sewer on Albert Street has sufficient capacity to support the proposed development. The City of Waterloo does not guarantee capacity within the receiving municipal infrastructure. A capacity analysis should be completed to confirm the receiving system can convey the demand from the development. The City of Waterloo considers any pipe capacity that exceeds 80%, as overcapacity. The developer may request the City to complete the modelling. A fee of $500.00 will apply.	The peak sanitary flow rates for the proposed density is 5.30 L/s, while the commercial area stayed the same. Modelling undertaken by the City will need to be completed to confirm down stream capacity issues.
5	Chung and Vander Doelen Engineering Ltd. Geotechnical Investigation indicates groundwater levels were measured at depths	Noted – a dewatering plan can be provided through the future site plan application process.

	ranging from 3.75m and 5.22m below the surface, and that the underground parking will be below the groundwater table. The applicant must satisfy Development Engineering demonstrate through the design how groundwater will be protected post construction. It's also been indicated a MECP permit to take water will be require. The City of Waterloo will require a dewatering plan to the satisfaction of the Director of Engineering.	
6	The Geotechnical Report also indicates a shoring system will be required to support the excavation and protect the adjacent properties. An Encroachment Agreement may be required if a tie back system is proposed that would extend into the municipal road.	Noted.
Engineering Infrastructure		
	The Functional Servicing and SWM Report (Report) for the application notes that the proposed development will have a sanitary discharge of 3.35 L/s. As per the provided Report, the proposed sanitary flow rates are as summarized in Table 1. Peak Flow = 3.35 L/s Peak Flow = 0.00335 m3/s	A revised report was submitted with the October 2024 submission package confirming the flow rate at 5.28 L/s. Through consultation with the Engineer, the increased densities provide for a slightly higher flow rate of 5.30 L/s.
	2029 Modelling Scenario The future conditions PCSWMM sanitary sewer model includes loading rates that are projected to reflect 2029 conditions. The projected 2029 model estimated flows do not account for flows from the proposed development. To be conservative, the flows resulting from the proposed development were added to the sanitary sewer model flows to determine the effects of the proposed development on the sanitary sewer system. The analysis was carried out for the wet weather modelling scenario as it is more conservative, using the Sanitary Hydraulic model developed for the Sanitary Master Plan completed in 2015.	Noted.
	Laurel Creek Trunk System The proposed flow of 3.35 L/s was accounted for in the MH L31-27 flows, the downstream receiving manhole. The 2029 projected 'post-development' modelling results indicate that the sanitary sewer on Albert Street	Noted.

	downstream of the proposed development appears to have available capacity under wet weather modelling scenarios, reaching a depth of 25% full, as shown on the figure below.	
7.0 Building Commnets		
1	Please ensure the proposed development complies with the Ontario Building Code and building best practices.	Noted.
8.0 Agency Comments		
8.1 Region of Waterloo		
1. General Comments and Next Steps Include:		
a	Staff encourage the developer to consider including three bedroom units, as directed by Sections 2.2.1.4 c) and 2.2.6.3 of the Growth Plan.	Even though 3-bedroom units are not required, the revised design includes 3-bedroom units. We also note that the 2024 PPS replaces the Growth Plan.
b	Development applications proposing residential uses will be required to indicate if and how they are contributing to meeting the affordable housing target set out in ROPA 6 Policy 3.A. 2, and include an assessment of mix and range of types, bedroom mix, unit sizes, tenures and accessibility requirements.	ROPA 6 policy states that 'area municipalities, in collaboration with the Region, will plan to provide a diverse range and mix of housing options with an overall target of a minimum of 30 percent of new ownership and rental housing being affordable to low and moderate income households.' The proposed development plans for 4% of the total units (10 units) to be planned for affordable housing in accordance with the CMHC requirements for affordable housing (where at the units will have rents below 30% of the median total income of all families in the subject market.)
c	Staff recommend that the developer meet with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability. Please contact Judy Maan-Miedema, Principal Planner (Housing) by e-mail JMaanMiedema@regionofwaterloo.ca or by phone at 226-753-9593.	Noted.
d	Regional staff require that a valid Section 59 Notice be obtained prior to OPA 52 and the corresponding Zoning By-law Amendment being considered by City Council.	A Section 59 Notice is included with this resubmission.

e	Regional staff require that the applicant submit a model request to the Region or perform a hydrant flow test to confirm the boundary conditions, and that an updated Functional Servicing & Stormwater Management Report be provided prior to OPA 52 and the corresponding Zoning By-law Amendment being considered by City Council. For further information regarding this requirement, please contact WaterServicesDistributionDevelopment@regionofwaterloo.ca	Please see the Revised Functional Servicing and Stormwater Management Report prepared by MTE, wherein they recommend the fire flow test be completed at the detailed design stage.
f	Staff require a revised Environmental Noise Assessment study be revised to address the peer review comments to the satisfaction of RWDI and Regional staff.	SLR has provided an opinion letter as an addendum to the submitted Wind Study from October 2024. This letter has been submitted concurrently with this resubmission package.
	To discuss any of the Regional comments, please contact those listed staff within the attached comment document or Susanna Reid, Senior Planner, Community Planning at 519-502-8298 or sreid@regionofwaterloo.ca	Noted.
8.2 Waterloo Catholic District School Board		
	The Waterloo Catholic District School Board (WCDSB) request the following condition(s): 1. That any Education Development Charges shall be collected prior to the issuance of a building permit(s). If further information is required, please contact Jordan Neale, Planning Technician, WCDSB, at Jordan.Neale@wcdsb.ca.	Noted.
8.3 Waterloo Region District School Board		
1	Student Accommodation: At this time, the subject lands are within the boundaries of the following WRDSB schools: • Keatsway Public School (Junior Kindergarten to Grade 6); • MacGregor Public School (Grade 7 to Grade 8); and • Waterloo CI (Grade 9 to Grade 12). The WRDSB's 2020-2030 Long-Term Accommodation Plan projects long-term overutilization at all of the above schools. Interim student accommodation measures, including	Noted.

	portable classrooms, are on-site and may be required until an alternative accommodation solution is in place. The WRDSB may conduct a boundary study or designate this property as a "Development Area" and assign it to Holding Schools before occupancy or sales.	
2	Student Transportation: The WRDSB supports active transportation, and we ask that pedestrians be considered in the review of all development applications to ensure the enhancement of safety and connectivity.	Noted.
3	The WRDSB supports active transportation, and we ask that pedestrians be considered in the review of all development applications to ensure the enhancement of safety and connectivity. WRDSB staff are interested in engaging in a conversation with the City and applicant to review the optimization of pedestrian access to municipal sidewalks and public transit so students may access school bus pick-up points. Student Transportation Services of Waterloo Region (STSWR)'s school buses will not travel privately owned or maintained right-of-ways to pick up/drop off students. Transported students will be required to meet the bus at a congregated bus pick-up point. STSWR may have additional comments about student pick-up point(s) placement on municipal right-ofways.	Noted.
WRDSB Draft Conditions		
	Concerning any future declaration or agreement, the WRDSB requests the following inclusions in the conditions:	Noted.
1	That the Owner/Developer shall include the following wording in the condominium declaration to advise all purchasers of residential units and/or renters of same: a. "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the	Noted.

	area, and further, that students may, in future, be transferred to another school." b. "For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information." c. "To limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."	
2	That the Owner/Developer enters into an agreement with the City to be registered on the title to the Property that provides: a. "All agreements of purchase and sale or leases for the sale or lease of a completed home or a home to be completed on the Property must contain the wording set out below to advise all purchasers of residential units and/or renters of same." i. "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school." ii. "For information on which schools are currently serving this area, contact the WRDSB	Noted.

	Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information." iii. "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick up point."	
3	That in cases where Agreements of Purchase and Sale have already been executed, the Owner/Developer sends a letter to all purchasers which includes the above statements [conditions 2 a. i., ii., and iii.].	Noted.
4	That the Owner/Developer supply, erect and maintain a sign (at the Owner/Developer's expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner/Developer shall submit a photo of the sign for review and approval of the WRDSB.	Noted.
5	Prior to final approval, the WRDSB advises in writing to the Approval Authority how the above conditions have been satisfied.	Noted.
6	Education Development Charges: Development on the subject lands is subject to the WRDSB's Education Development Charges By-law, 2021, as amended or any successor thereof and may require the payment of Education Development Charges for these developments before issuance of a building permit.	Noted.
7	The WRDSB requests to be circulated on any subsequent submissions and reserves the right	Noted.

	to comment further on development proposals for the subject lands.	
	If you require further clarification, please contact Emily Bumbaco, Senior Planner, at emily_bumbaco@wrdsb.ca.	Noted.
8.4 Enova Power		
	Existing System: Enova has overhead distribution lines on Albert Street and Seagram Drive. Enova intends to maintain the overhead distribution system on all abutting streets.	Acknowledged
	Load Information: Customer's load information such as a P.Eng stamped single line diagram and load calculation must be submitted to Enova in order to determine the service size and supply method. For more information refer to the Conditions of Service available at enovapower.com.	Noted.
	Technical Requirements: The applicant shall consult with Enova throughout the site plan review and design phases to ensure that all Enova servicing requirements are met. Enova will generally supply an overhead transformer if the service size is 400A or less. If a larger service size is required, the developer must make provisions for the installation of a pad mounted transformer or a transformer vault room and primary duct bank on private property. This requirement is evaluated on individual project basis. Refer to the Enova (formerly Waterloo North Hydro) Technical Guidelines document for details.	The owner and their team will consult with Enova through the future site plan submission.
	Transformer Location: The transformer shall be installed such that any part of the transformer when mounted is a minimum 6.0 m from any openings, doors or windows, and a minimum 3.0m from any combustible surfaces or materials including neighbouring buildings and fences.	As shown on Plan, a transformer room is proposed.
	Transformer Grounding: The transformer vault grounding will be installed within a grassed area. The grounding grid cannot be installed under asphalt, curbs, etc.	As shown on Plan, a transformer room is proposed.
	Easement: Enova will require an easement at no cost to Enova within the proposed development site for supporting, repair, restoration and maintenance of Enova owned	Noted

	above-ground and underground facilities. For example, a 6.2m x 6.8m easement for an Enova owned pad mount transformer; a 3m wide easement for any duct bank structures. Refer to the Enova (formerly Waterloo North Hydro) Technical Guidelines document for details.	
	Vault Room: If a transformer vault room is required for the service it must be constructed according to Enova (formerly Waterloo North Hydro) vault room standards. Additionally the vault room must meet all applicable requirements under the Ontario Building Code.	As shown on Plan, a transformer room is proposed.
	Metering Room: The customer must provide a convenient and safe location satisfactory to Enova for the installation of meters, wires and ancillary equipment. The location allocated by the customer for Enova metering shall provide direct access from outside for Enova staff unless otherwise agreed to by Enova. Enova will not accept new meter locations in basements.	Noted.
	Set Back: The proposed building(s) must be set back a minimum of 5.0m from the pole line to allow for conductor swing as per requirements of Ontario Building Code Section 3.1.19.	On both streets, the poles are located between the sidewalk and the travelled portion of the road. The building is located at least 5 m from the sidewalk.
	Clearance: Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle equipment) shall not be brought closer than 5 metres to an energized overhead conductor owned by Enova.	Noted.
	Road Widening: _____ should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate relocation of Enova's poles.	Road widenings are required, however, if the poles are moved, they could only be moved for a portion of Seagram Drive as the City does not have the road allowance to reconstruct and further widen the road. Bringing the poles closer to this property would also impact adjacent properties.
	Grading: Any grading changes by the developer which will affect existing Enova facilities either on private property or municipal right of way shall be reviewed and approved by Enova prior to any site grading.	Noted.

	Relocation of Facility: Any relocation of Enova facilities will be at the expense of the requesting party.	Noted.
	Landscaping: The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the ESA Planting Under or Around Powerlines & Electrical Equipment guideline.	Noted.
	Next Steps: A minimum of 8 months prior to the desired in-service date the Developer must submit a Service Request Form (available at enovapower.com) and provide the required information listed in Section 3 of the Service Connection Process to Enova. Please note Enova requires a signed Offer to Connect (OTC) and the receipt of payment for the service prior to procuring equipment.	Noted.
8.5 Canada Post		
	Canada Post has reviewed the proposal for the above noted Development Application and has determined that the project adheres to the multi-unit policy and will be serviced by developer/owner installed Lock Box Assembly. Multi-unit buildings and complexes (residential and commercial) with a common lobby, common indoor or sheltered space, require a centralized lock box assembly which is to be provided by, installed by, and maintained by the developer/owner at the owner's expense. Buildings with 100 units or more MUST have a rear loading Lock Box Assembly with dedicated secure mail room. Should the description of the project change, please provide an updated plan in order for us to assess the impact of the change on mail service. The complete guide to Canada Post's Delivery Standards can be found at: https://www.canadapost.ca/cpo/mc/assets/pdf/business/standardsmanual_en.pdf	Noted.
Region of Waterloo – Post Circulation Comments		
Community Planning		
Provincial Policy		
	Regional staff note that the proposed apartment building includes 1 and 2 bedroom	See previous response.

	units. In order to accommodate a range of household sizes, staff encourage the developer to consider including three bedroom units, as directed by Sections 2.2.1.4 c) and 2.2.6.3 of the Growth Plan.	
Regional Official Plan		
	Regional staff require that the applicant provide an assessment of mix and range of types, bedroom mix, unit sizes, tenures and accessibility requirements.	Please clarify what this 'assessment' means and refer to the related requirement. The development includes a mix of one, two and three bedroom units.
	Region staff note that the development does not include affordable units. More detailed housing comments are provided below.	Please see previous response.
	Region staff note that the reducing parking spaces is supported by ROPA 6 Policy 2.D.2.2 e).	A minimum supply of parking is no longer required in PMTSAs.
Housing Services		
	The Region supports the provision of a full range of housing options, including affordable housing. If these applications are approved, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Regional Official Plan. Rent levels and house prices that are considered affordable according to the Regional Official Plan are provided below.	Noted.
	Staff recommend that the developer meet with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability. Please contact Judy Maan- Miedema, Principal Planner (Housing) by e-mail JMaanMiedema@regionofwaterloo.ca or by phone at 226-753-9593.	Noted.
Record of Site Condition (RSC)		
	A RSC is not required according to Region of Waterloo's Implementation Guideline for the Review of Development Applications On or Adjacent to Known and Potentially Contaminated Sites, as there are no threats in the Threat Inventory Database on or adjacent to 177-179 Albert Street.	Noted.
Hydrogeology and Water Programs (HWP)		
	Regional staff advise that the Region does not support permanent active or passive	Permanent dewatering is not proposed.

	dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. Waterproof seals should be used in lieu of permanent dewatering controls for below-grade infrastructure requiring dry conditions.	
Notice of Source Protection Plan Compliance (Section 59 Notice)		
	Regional staff require that a valid Section 59 Notice be obtained prior to OPA 52 and the corresponding Zoning By-law Amendment being considered by City Council.	A Section 59 Notice has been prepared and included with this resubmission for the Official Plan and Zoning By-law Amendment.
Water Services		
	Region staff have reviewed the Functional Servicing & Stormwater Management Report prepared by Walter Fedy (November 10, 2023). The applicant has not demonstrated their proposed development can be supported by the existing infrastructure.	MTE provided an updated report with the resubmission in October 2024 to support the densities.
	Regional staff require that the applicant submit a model request to the Region or perform a hydrant flow test to confirm the boundary conditions, and that an updated Functional Servicing & Stormwater Management Report be provided prior to OPA 52 and the corresponding Zoning By-law Amendment being considered by City Council.	See previous response.
Environmental and Stationary Noise Study		
	RWDI has identified a number of actions required by the applicant. The Region of Waterloo seeks assurance that the sound levels and impacts are accurate and complete. As RWDI's comments have the potential to change the outcomes and conclusions of the study, revised analysis, additional information, clarification and supporting justification are required before City Council considers the applications.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
	Regional staff require that the Environmental Noise Assessment study be revised to address the peer review comments to the satisfaction of RWDI and Regional staff prior to City Council considering the applications.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as

		part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
RWDI Peer Review - Noise		
Road Transportation Noise		
9	Traffic noise is evaluated for Albert Street and Seagram Drive. a. It is appropriate that Albert Street and Seagram Drive are included in the evaluation of traffic noise. b. Based on the zone of influence described in the Waterloo TOR, University Avenue West should be considered for this development or justification should be provided why its contribution is insignificant. c. It is reasonable that Lester Street is not considered.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
10	Traffic data was obtained from the Region of Waterloo data portal. a. The traffic volumes were calculated to 2033, which is a 10-year future date from the date of the report. The data was valid at the time the report was prepared. b. The traffic data report indicates that the City of Waterloo should verify the forecast. Verification from the City of Waterloo should be confirmed by the consultant. If the City provides traffic volumes that are 10% or more higher, the results should be updated.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
11	The report describes modelling of road traffic using a hybrid of ORNAMENT source sound emissions, with Cadna/A for the sound propagation. A comparison point of this method with an ORNAMENT-based STAMSON calculation is provided for validation. a. The use of this modelling method, supported by a STAMSON validation, is suitable in this situation. b. Source sound emissions from ORNAMENT are provided in an appendix table.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.

	i. The input traffic volumes suitably reflect the data provided by the RMOW. ii. The road gradient for Seagram Drive is shown as 0%, while the slope calculated from publicly-available information is greater. Since the percentage of trucks on Seagram Drive is low, the influence will be small and no change to the modelling is required. iii. The road gradient for Albert Street is suitable. c. The Cadna/A modelling should be appropriately documented. i. Since the software includes several sound propagation algorithms, the consultant should clarify what algorithms were used for the transportation sound propagation. ii. Use of reflective ground is suitable. iii. The remaining model settings should be provided, such as temperature, relative humidity and order of reflections. iv. Documentation of the Cadna/A portion of the verification should be completed by providing a sample output file for the verification location. d. The STAMSON file for comparison is documented in the report. i. The traffic volumes used are appropriate. ii. The angles of exposure are as expected. iii. The use of reflective ground is suitable. iv. The source-receiver distances are reasonable. e. The results of the two methods are shown to be comparable. The modelling	

	approach is reasonable for this application.	
15	The report summarizes the consequences of the modelled sound levels. a. The conclusion that façades do not need to be upgraded for sound level management is consistent with modelled results. b. Results of the modelling are reflected in a ventilation requirement, as is appropriate. However, the report indicates the freedom to select a system other than "provision for central air conditioning", without providing the supplementary requirements associated with alternatives. The report should provide the additional information (i.e., description, assurance, certification and feasibility demonstration) required in section 3.3.6 of the RMOW policy. c. The need for warning clauses is appropriately noted and should be refined or confirmed when the site plan is finalized.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
Stationary Source		
16	The report describes the selection of stationary sources for evaluation using the D-series guidelines. All buildings at Wilfred Laurier University are described as Class I industries, having a zone of influence not greater than 70 m. Aerial photography for the university campus shows sources that are associated with zones of influence greater than 70 m. These include large air-cooled condensers, cooling towers, and emergency generators. The Class I description is not universally applicable and should be revised on a per-building basis in consideration of the sources present. The 10-fan air-cooled condenser at Martin Luther University College illustrates this based on the impacts which the report presents at 100+ m distance.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
17	The evaluation is limited to an exhaust louvre at the Wilfred Laurier University Library and	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply

	three air cooled chillers at Martin Luther University College. a. The pair of cooling towers, large generator and 12-fan air-cooled condenser located further to the northeast of the proposed development, on or south of the Dr. Alvin Woods Building should be considered. b. The 8-fan air-cooled condenser to the west of the proposed development, at 88 Seagram Drive, should also be considered. c. One near-grade exhaust louvre at the Wilfred Laurier University Library is considered. i. It should be clarified which of the four similar louvres on the building was considered. ii. The library has a mechanical penthouse with louvres and ventilation that have not been considered, but could have impact on the proposed development, and should therefore be addressed. iii. Supporting information should be provided that the remaining louvres were considered under their predictable worst-case operating condition. iv. The duty cycle that was applied is acceptable. d. One 10-fan air cooled chiller on Martin Luther University College was considered. i. SLR historical data was applied for the sound level. The sound power level is uncharacteristically quiet. Supporting sound level information for the predictable worst-case operation, such as manufacturer data, should be provided.	to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.

	ii. The duty cycle of 100% during a predictable worst-case daytime hour is acceptable. iii. The nighttime duty cycle of 25% or 15 minutes per hour is much lower than typical and must be supported by evidence from the University or sign-off from the designer of the system. As an alternative, a 50% nighttime duty cycle is acceptable. e. Two 2-fan air cooled chillers on Martin Luther University College are modelled. i. The sound power level data is reasonable. ii. The duty cycle of 100% during a predictable worst-case daytime hour is acceptable. iii. The nighttime duty cycle of 25% or 15 minutes per hour is much lower than typical and must be supported by evidence from the University or sign-off from the designer of the system. As an alternative, a 50% nighttime duty cycle is acceptable.	
20	The modelling was done using the Cadna/A software package. a. The ISO 9613 sound propagation algorithms are a suitable model. b. The temperature and relative humidity information provided describe standard settings. c. The use of 1 order of reflection is reasonable here. d. The wall absorption coefficients are acceptable in this situation. e. A global ground absorption of G=0 for reflective ground is acceptable. f. It should be clarified if local areas of non-reflective or less reflective ground are applied, and if so, where.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
Impact of the Development		
25	The report defers the consideration of both noise impact from the development on itself and noise impact of the development on the	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply

	surroundings until the mechanical systems have been designed. a. In this situation it is reasonable to defer the assessment since the necessary information is not yet available. b. The use of NPC-300 and/or NPC-216 for these assessments is appropriate. c. The acoustic specifications for a mechanical system should be provided to the mechanical designer at the beginning of the design process to ensure that a type of system is selected that is capable of meeting the acoustic requirements. d. A condition should be included in the application that, prior to Building Plan approval, the mechanical equipment noise impact be reviewed and signed-off that the sound level criteria will be met upon construction. The review and sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List. e. A condition should be included in the application that sound impact on the development be verified to comply with the sound level criteria and signed-off prior to occupancy permits. The verification and sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List.	to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
Conclusions and Recommendations		
26	The Transportation Noise conclusions reflect the building façade, ventilation and warning clause details of the report. The barrier requirements or the appropriate warning clause should be listed in this section.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
27	The Stationary Source Noise conclusions regarding surrounding sources correctly reflect the analysis of the report.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply

	a. The barrier requirements for the outdoor amenity space are missing from this section and should be added. together with statements concerning review, verification and sign-off. b. If response to this review changes the analysis, the conclusions should be amended	to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
29	The reviews, verification and sign-offs that are required to address the impact of the development on itself and the impact of the development on its surroundings must be added to the conclusion and recommendations.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
Summary		
	The environmental noise study provided for 177-179 Albert Street, Waterloo presents an assessment for road traffic and on-site stationary source noise sources. The Region of Waterloo seeks assurance that the sound levels and impacts are accurate and complete. Comments provided in this review have the potential to change the outcomes and conclusions of the study. Revised analysis, additional information, clarification and supporting justification is required. Key items are: • Confirmation of road traffic volumes with the City of Waterloo should be provided; and • Additional offsite stationary source information is required and updated analysis as necessary	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.
	Without addressing these it is not possible to provide assurance that the values, results and conclusions are reasonable. Since a barrier is proposed, the following review, verification and sign-off are recommended: • Prior to Building Plan Approval, the barrier construction should be reviewed and confirmed to meet the barrier requirements specified. The review and	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this

	sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List. • Prior to Occupancy Permits, the barrier construction must be verified and signed-off as complying with the barrier requirements specified. The verification and sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List.	letter for how the Noise comments have been addressed.
	Since the impact of the develop on itself and the impact of the development on its surroundings are deferred, we recommend that the application be provided with the following conditions: • Prior to Building Plan Approval, the mechanical equipment noise impact must be reviewed and signed-off showing that the sound level criteria will be met upon construction. The review and sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List. • Prior to Occupancy Permits, the mechanical equipment noise impact on the development and surroundings be verified and signed-off as complying with the sound level criteria. The verification and sign-off are to be completed by an individual on the Region's Pre-Qualified Consultants for Noise Studies List.	The Updated Noise Study (October 2024) was submitted as part of the previous submission package and continues to apply to the updated design as part of this resubmission. In addition, SLR provided a Response to the Peer Review Comments as part of the October submission package dated, October 10, 2024. Please refer to this letter for how the Noise comments have been addressed.

Response to Second Submission Comments (February 27, 2025):

Submission 2 Post Circulation Comments – February 27, 2025		
	Comment	**Response**
1.1	**Land Use and Built Form**	
	The City's current, in effect Official Plan designates the subject lands as 'Mixed-Use High Density Residential' on Schedule A, whereas the proposed updated Official Plan (November 2024, Phase 1) designates the subject lands as 'High Rise Residential'. Furthermore, the updated Official Plan	Noted and discussed in Planning Justification Report Addendum.

	proposes to designate the lands from 'High Density, 81 metres' on Schedule B1 to 'High Rise, 30 storeys'. Note that density minimum/maximum has been removed from the proposed Official Plan, but may be further defined in the implementing Zoning By-law. Density provisions may be based on considerations that are unique to individual sites or areas.	
	Pending Provincial approval of the updated Official Plan, an Official Plan Amendment would not be required because the height of 30 storeys would be permitted in the Official Plan and there would be no specified density maximum in the Official Plan.	The application for increased height is being requested in advance of Provincial approval and aligns with the adopted Official Plan Updates by the City of Waterloo
	Should the Applicant advance this application prior to the updated OP policies/schedules coming into effect, the Applicant will be required to provide ample justification as to the appropriateness of the increased height and density.	Included in Planning Justification Report Addendum.
	Consistent with these criteria and the intent of existing/proposed Official Plan (e.g. defunct bonusing policies; section 12.3.1), staff, the public and Council look for a demonstrated benefit to the surrounding community associated with the increased height/density. Staff previously supported the increased density on the basis that the housing tenure would be rental units geared towards students. The Applicant has now stated alternative benefits for the revised proposal being: (a) commercial on the ground floor, whereas no commercial was previously proposed; (b) broadening of unit types being majority 2-bedroom units and some 3-bedroom units; and (c) providing 4% of the units as affordable housing. On a preliminary commenting basis, Planning staff are supportive of these benefits being implemented. More information is requested in this regard in the Applicant's updated justification report/letter.	These items have been addressed in the Planning Justification Report Addendum. We recognize that there are a number of site specific requests, but many are a result of the requested road widenings by the City. In an effort to provide benefit to the community the applicant is providing commercial at grade with a patio dedicated to commercial space, an array of unit types, including studio, one bedroom, two bedroom and three bedroom units, 4% of the total unit count will be affordable housing based on the CMHC definition for affordable housing and a commitment to provide large canopy trees within public right of way and enhanced landscaping within the street line setback on the subject lands.
1.2	**Parking**	

	Staff acknowledge that minimum parking requirements are no longer applicable within Major Transit Station Areas. In the first submission, 44 vehicular parking spaces were proposed for 146 units in line with Northdale parking rates. The same amount of parking is proposed in this resubmission, despite the increase in units. Additional information should be provided from the applicant to assure the public and council that the amount proposed is sufficient for the proposed development when considering its impact to the surroundings. The applicant is encouraged to reference the Official Plan and urban design policies related to parking in support of their resubmission, as part of the updated PJR	There are no minimum parking requirements in the Major Transit Station Areas. Since the previous submission the total number of parking spaces has been reduced to 37 parking spaces located in the parking structure below grade.
1.3	**Urban Design/Heritage**	
	All residential developments shall be consistent with the City's urban design objectives and policies as set out in the Official Plan and supporting implementation documents. Relevant policies sections include: 3.11.1 (General Urban Design Policies), 3.11.2 (Urban Design within Nodes and Corridors), and 3.11.4 (Urban Design within Station Areas). Refer to the updated Official Plan, Chapter 3 for urban design policies that are applicable to this development proposal.	Addressed in Planning Justification Report Addendum.
	Planning staff previously shared support for the Applicant's first Urban Design Brief; however, the resubmission design has substantially changed, and supporting justification for the site specific modifications to the built form regulations in the By-Law must be provided through supporting graphics and text in the form of an addendum to the urban design brief that provide clear rationale for the appropriateness of this site for this	Design changes have been detailed through the Planning Justification Report. A number of cross sections, elevations and details have been provided to support the site specific modifications.

	development.	
	As communicated previously, the proposed development does not require any heritage assessments or approvals, but the building is in close proximity to the MacGregor-Albert Heritage Conservation District. The jump from 2-storey built forms in the heritage district to 30 storeys on the subject site should be spoken to in the updated PJR / UD Brief. To this end, the Applicant is strongly encouraged to incorporate design elements, materials, etc. that honour and take cues from the heritage district to help with this transition of styles and built form.	The design is consistent with the station area planning for the Major Transit Station Area. The Planning Justification Report Addendum discusses the City's vision and approach for the connection between Laurier University and the station in Waterloo park, where additional road widenings are being assumed to provide for additional streetscape vegetation/ canopy trees to soften the building edge along the transit station area. In addition, the architect has emphasised the pedestrian scale design and pedestrian first design by providing cantilevered canopies to reduced perceived building height along the first storey of the building and step backs above the tower to reduce building mass.
1.4	**Environmental Comments**	
	As per previous comments, the Energy Strategy presents various measures that could be incorporated into the proposed development to improve its energy and carbon performance. The applicant is encouraged to continue to pursue these and other measures to optimize energy efficiency, reduce greenhouse gas emissions, and increase climate resilience. This could include enhancing the energy performance of the proposed building, striving towards a near-zero emissions level of performance, incorporating low carbon heating and cooling systems and on-site renewables, identifying embodied carbon reduction strategies, and improving building resilience through increased thermal resistance, adaptable building systems, and back-up power systems that could provide 72 hours of support for hot and cold water, elevator service, space heating, lighting, and receptacle power.	Noted. Will be detailed through the Site Plan Approval process.
	The properties are located within the area covered by the Grand River Source Protection Plan. A Section 59 Notice will be required at	Completed and submitted with resubmission package.

	each stage of the development process. The applicant can continue to go to taps.regionofwaterloo.ca to complete a questionnaire to confirm what source protection-related activities are regulated on the properties through the Grand River Source Protection Plan and to obtain the required Section 59 Notices.	
	Shadow Study – please provide addendum	Submitted.
	Pedestrian Wind Assessment – addendum	Submitted.
2.0	**Landscape and Public Realm**	
a	It appears that overhead hydro along Albert Street and Seagram Drive will restrict the provision of landscaping and street trees. Potential conflicts should be reviewed to maximize tree planting across the site and help promote a pedestrian scale of the building. Ensure trees will be possible that meet Enova Power's acceptance for location and size.	The Station Area Planning Report, 2017 provides information relating to the Seagram Drive cross section and proposed improvements within the right of way. The plan proposes removing the turn lane that exists today heading east bound to Albert Street, and providing a two lane road. On the north side of Seagram a boulevard is planned and showing hydro only for street lighting and pedestrian scaled lighting. The additional lands being requested to increase the overall right of way to 26.0m will allow for City control over the lands to ensure street trees are planted on the north side of sidewalk to improve the pedestrian experience while still leaving room in the other boulevard for hydro. A cross section from this study is included in the Planning Justification Report Addendum.
b	The applicant is seeking a reduction in the required Landscaped Open Space (LOS) from 30% to 24%. Please clarify which areas have been included in the LOS calculation, as it appears that 24% has not been provided. For example, it appears that the space above underground parking with steep slopes on the project north portion part of the site has been included (it is hatched green) and this area is not permitted to count toward LOS. It also appears that areas outside of the property boundary into the public right-of-way have been included. Clear and accurate	The landscape open space has increased on the submitted redesign to 35.4% which exceeds the minimum landscape open space requirement of 30%.

	calculations will be required before LOS reduction is considered by staff.	
c	LOS reduction is due to grading constraints on site that would limit landscaping opportunities along the west side of the site. Can the adjacent retaining wall be removed and replaced to make the most of the space between the two properties?	The retaining wall relates to the structured parking that extends out of the ground due to grade changes falling from Albert Street towards the west property line. The Architect has utilized the top of the structured parking area to provide a patio area for the commercial uses to spill into.
3.0	**Transportation and Active Transportation**	
a.	Given that the scope of the application has changed, staff request additional analysis through the transportation impact study. The following information must be provided: • Trip generation for active transportation (walking, cycling and transit) • Verify sufficient capacity for active transportation users (ie. Are sidewalks, bike lanes, and other active transportation facilities adequate to support users? Do they have sufficient width?) • Any recommendations to improve safety and connectivity for active transportation users	The number of parking spaces has been reduced to 37 spaces which is less than the original proposal. Less trips will be proposed over all. We trust that with less vehicles on site the TIS originally submitted will be sufficient to proceed with the OPA/ZBA application.
b	A reference plan should be provided in the next submission.	A reference plan for the road widenings will be submitted once the road widening requirements are confirmed. Currently there is conflicting requirements for the corridor width and would like confirmation through the OPA/ZBA process before the reference plan is formally prepared.
c	Note: the sidewalk along Albert Street must be setback 0.3 metres from the property line.	Noted.
d	There are hydro lines on both Albert St and Seagram Dr along this property. Are we able	We agree that Site Plan is the right time for this level of detail.

	to ask for a conceptual workspace management plan at this stage? It may be more appropriate to ask this during site plan	
4.0	**Engineering Comments**	
1	Additional height will require two water supplies. In accordance with Ontario Building Code, Section 3.2.9.7, if the building(s) is 84 m or more high, measured between grade and the ceiling level of the top storey, the building(s) shall be served by not less than two sources of water supply from a public water system. The City requires that if two separate watermains are available to service the development, then the applicant must connect to each watermain. The water supply shall be sufficient to provide flow of at least 1,890 L/min for not less than 30 minutes at a pressure of not less than 450 kPa.	Two water services will be provided as per building code requirements.
2	FSR sanitary line was incorrectly scaled. Need to amend. The Functional Servicing Report states that the existing sanitary sewer on Albert Street is 300mm. The size of the existing sanitary sewer on Albert Street is 250mm. Please amend drawings and FSR with correct sewer size.	Addressed in updated Functional Servicing Report.
3	A capacity analysis should be completed to confirm the receiving system can convey the demand from the development, as The City of Waterloo does not guarantee capacity within the receiving municipal infrastructure. The City of Waterloo considers any pipe capacity that exceeds 80%, as overcapacity. The developer may request the City to complete the modelling. A fee of $540.00 will apply.	Will be addressed under separate cover by engineer.
4	Geotechnical Investigation indicates groundwater levels were measured at depths ranging from 3.75m and 5.22m below the surface, and that the underground parking will be below the	Will be completed through Site Plan. The basement will be waterproofed, and water will not be pumped into the sewer.

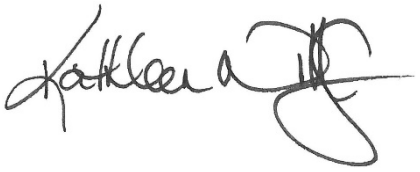
	groundwater table. The applicant must satisfy Development Engineering demonstrate through the design how groundwater will be protected post construction. It's also been indicated a MECP permit to take water will be require. The City of Waterloo will require a dewatering plan to the satisfaction of the Director of Engineering.	
5	The Geotechnical Report also indicates a shoring system will be required to support the excavation and protect the adjacent properties. An Encroachment Agreement may be required if a tie back system is proposed that would extend into the municipal road.	Acknowledged
5.0	**Agency Comments**	
	Region of Waterloo	
a	A signed Notice of Source Protection Compliance.	Included in resubmission.
b	A letter of no objection from Nav Canada.	We have requested this from Nav Canada and are in the queue. We suggest this be a condition of site plan approval or added as a holding provision to the Zoning Amendment Approval.
c	Any comments identified following the Regional review of the updated noise study.	Addressed through SLR response letter as part of previous submission.
	Enova Power	
a	The vault room size meets the standard 12-350A3.	Noted.
b	Please follow standards 12-350A1 and 12-350A3 for the construction methods and requirements for the vault room.	Noted.
c	A duct bank is required out of one corner (opposite to secondary) to property line. A 3m easement is required over this as well as the vault room itself.	Noted.

We look forward to continuing to work with staff on this project. Should you have any questions or require any further information, please do not hesitate to contact the undersigned.

Yours truly,

MHBC





Pierre Chauvin, MA, MCIP, RPP
Partner

Kate Wills, BES, MCIP, RPP
Associate

cc. Reema Masri

B

Appendix B: Wind Study – Opinion Letter Prepared by SLR

SLR Consulting (Canada) Ltd.
100 Stone Road West, Suite 201, Guelph, ON N1G 5L3

May 23, 2025

Attention: Parker Zhang
14688210 Canada Inc.
C/O MHBC Planning, Urban Design & Landscape Architecture
540 Bingemans Centre Drive, Suite 200
Kitchener, ON N2B 3X9

SLR Project No.: 241.030998.00002

Revision: 1A

RE: Addendum Letter & Drawing Review for Pedestrian Wind Comfort
177-179 Albert Street – Waterloo

SLR Consulting (Canada) Ltd. (SLR) provides this letter at the request of 14688210 Canada Inc. This letter provides our opinion on the potential effect the recent design changes to the proposed development at 177-179 Albert Street in Waterloo may have on the pedestrian wind conditions in the vicinity of the development.

Background

SLR previously completed the following deliverables with regards to this proposed development:

- A pedestrian wind assessment in October 2024 for the proposed development, summarized in SLR's report titled "Pedestrian Wind Assessment – 177-179 Albert Street – Waterloo, Ontario – SLR Project #241.030998.00001" and dated October 21, 2024.

Updated Architectural Information

Updated architectural drawings were received by SLR on May 7 and May 20, 2025, and were compared to the original drawings used for the construction of 3D computer model (received between August 6 and August 12, 2024). The following relevant differences were noted between the two sets of drawings:

- Previously the podium was 1.0 m from the north property line and approximately 6.9 m from the west property line. Currently, the podium is setback from the north property 3.0 m and 4.4 m from the west property line. Therefore, the building has shifted slightly to the southwest.
- Previously the tower was setback approximately 6.5 m from the north property line. Currently, the tower is setback 9.0 m from the north property line.
- Previously, the podium had a floorplate of approximately 28 m by 33 m, with the long axis parallel to Albert Street. Currently, the podium has a floorplate of approximately 30 m by 32 m, with the long axis parallel to Albert Street.
- Previously, the podium was six storeys tall (approximately 20 m along Albert Street). Currently, the podium is four-storeys tall along the north facade (approximately 15 m), and six-storeys tall (approximately 23 m) along the west, south and east facades.

- Previously the building was approximately 98 m tall. Currently, the building is approximately 102 m tall. Both of these heights are measured from Albert Street.
- Previously, there were outdoor amenity terraces along the west, north and east sides of the tower at Level 6. Currently, there are outdoor amenity terraces at grade along the west facade, at the northeast corner of Level 6, and at the southwest corner of Level 6.
- The wrap-around canopy along the west, south, and east facades is a positive design feature. Currently, this canopy protrudes beyond the tower/podium above approximately 3.4 m along the west facade, approximately 2.0 m along the south facade, and approximately 4.0 m along the east facade.

Commentary on Pedestrian Wind Comfort

Overall, the massing of the proposed development has changed minimally since the qualitative pedestrian wind assessment of October 2024. Therefore, the results described in the October 21, 2024, report remain applicable. Wind comfort conditions on and around the site are expected to be suitable for walking or better throughout the year, with the windiest areas at the northeast corner throughout the year, as well as along the south facade in the winter season. In addition, safety exceedances were predicted along the north and south sides of the proposed building. The wrap-around canopy will provide local protection from downwashing flows, a positive design feature, however it may be insufficient to fully disrupt the strong wind flows further from the building. Note, the analysis extends approximately 150 m from the building in all directions and considers the existing surroundings within a 500 m radius (see methodology in the October 2024 report).

To improve wind conditions, we recommend the design team consider the following mitigation as the design progresses:

- The inclusion of wind mitigation features at the northeast corner of the building to address the safety concerns. These could include: a tall fence at northeast corner directed north to the property line; individual wind screens at grade at the northeast corner, which could be incorporated into landscaping; a wrap-around canopy at the northeast corner; 50% porous screens within the facade cutouts along the west, north and east facades of the surface parking area.
- The incorporation of additional standalone horizontal features at the southeast corner of the building, to disrupt the downwashing wind flows from the southwest. These may be necessary if the wrap-around canopy in the area proves to be insufficient during quantitative analysis.
- Consider the inclusion of vertical wind mitigation features at the southeast corner of the property. These features would be considerate of vehicular sight lines, and other safety concerns.

SLR will work with the design team to develop and assess appropriate wind control features to improve the windy conditions identified, as the design progresses to the Site Plan Control (SPC) application stage.

Also, with regards to wind safety, exceedances are predicted along the north and south facades of the proposed building, per the October 2024 report. Note, it is SLR's experience that the qualitative approach utilized for the initial analysis can skew conservative with regards to safety concerns. Hence, we strongly recommend confirming these wind conditions through a quantitative wind tunnel analysis during the SPC stage.

Conclusion

The changes to the overall development are minimal in nature and hence are expected to have a negligible influence on the wind comfort and wind safety conditions on and immediately surrounding the site. Hence, the comfort and safety conditions described in SLR's report of October 2024 remain valid. Recommendations have been provided for the design team to consider as the overall design progresses.

We recommend conducting a quantitative wind tunnel study for the next planning application in order to confirm the wind conditions and to incorporate practical and effective wind control measures. This analysis could also consider the potential for future buildings in the vicinity, if required by the City.

Statement of Limitations

This report has been prepared by SLR Consulting (Canada) Ltd. (SLR) for 14688210 Canada Inc. (the Client) in accordance with the scope of work and all other terms and conditions of the agreement between such parties. SLR acknowledges and agrees that the Client may provide this report to government agencies, interest holders, and/or Indigenous communities as part of project planning or regulatory approval processes. Copying or distribution of this report, in whole or in part, for any other purpose other than as aforementioned is not permitted without the prior written consent of SLR.

Any findings, conclusions, recommendations, or designs provided in this report are based on conditions and criteria that existed at the time work was completed and the assumptions and qualifications set forth herein.

This report may contain data or information provided by third party sources on which SLR is entitled to rely without verification and SLR does not warranty the accuracy of any such data or information.

Nothing in this report constitutes a legal opinion nor does SLR make any representation as to compliance with any laws, rules, regulations, or policies established by federal, provincial territorial, or local government bodies, other than as specifically set forth in this report. Revisions to legislative or regulatory standards referred to in this report may be expected over time and, as a result, modifications to the findings, conclusions, or recommendations may be necessary.

Closure

Should you have any questions or comments, please feel free to contact us.

Regards,

SLR Consulting (Canada) Ltd.

DRAFT

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DRAFT

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Principal, Microclimate
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C

Appendix C: Shadow Impact Study

Prepared by Masri O Architects

SPRING SHADOW DIAGRAMS

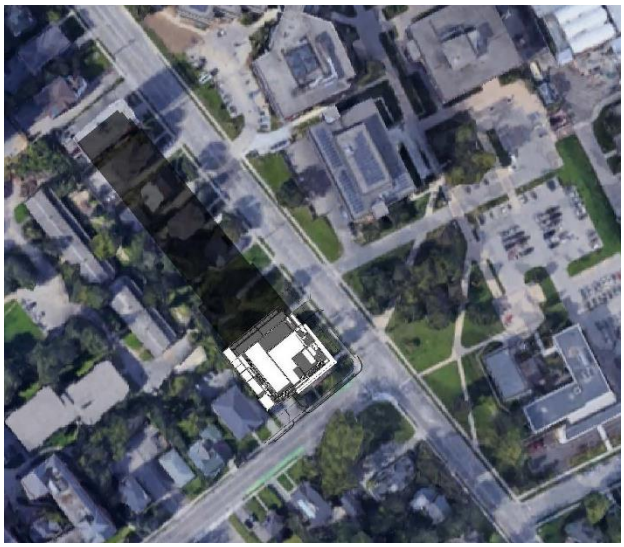


Figure 5 – March 21 @ 10am

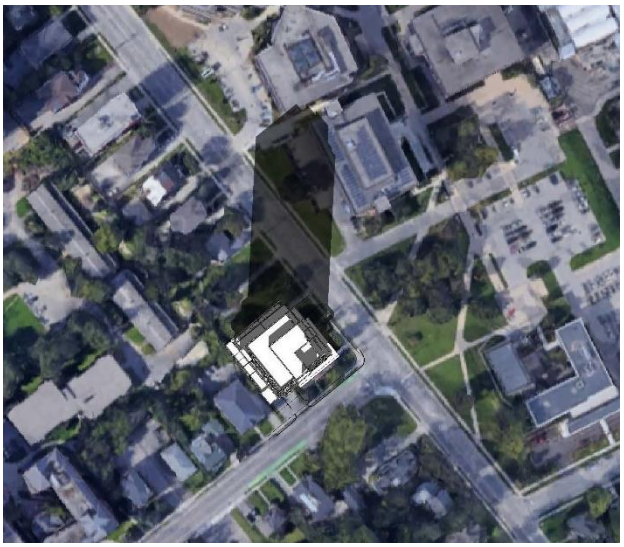


Figure 6 – March 21 @ 12pm



Figure 7 – March 21 @ 2pm



Figure 8 – March 21 @ 4pm

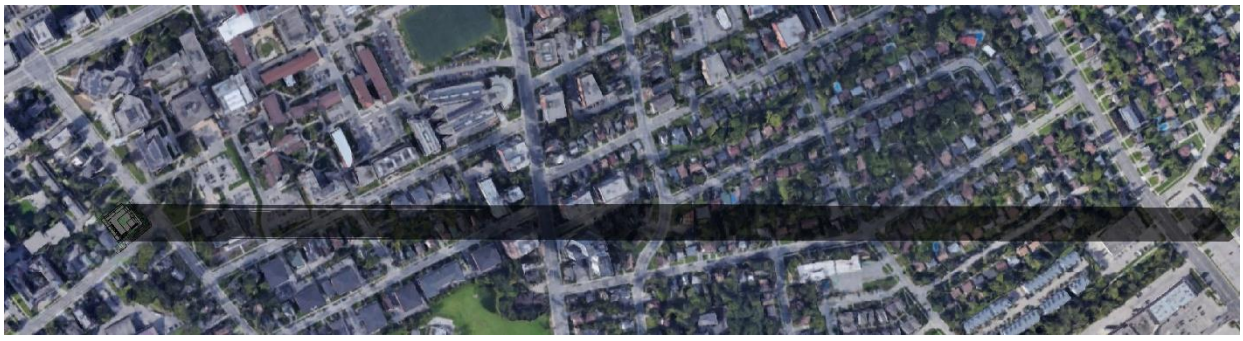


Figure 9 – March 21 @ 6pm

1. SUMMER SHADOW DIAGRAMS

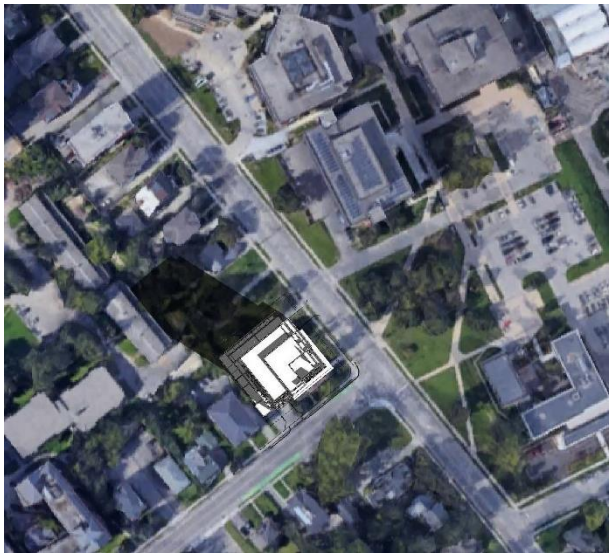


Figure 10 – June 21 @ 10am

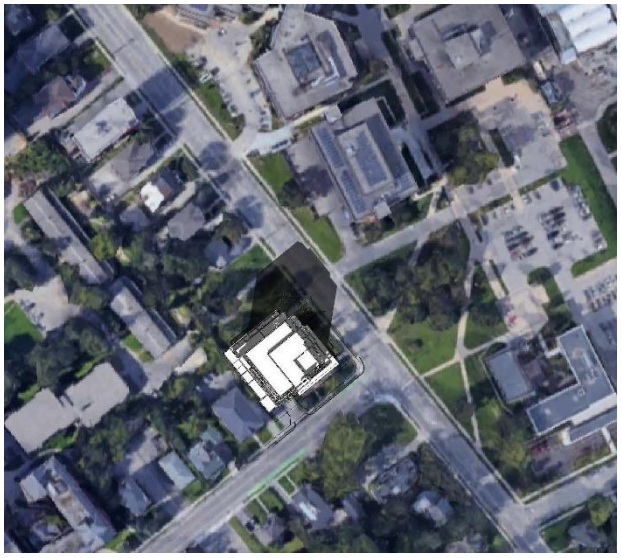


Figure 11 – June 21 @ 12pm

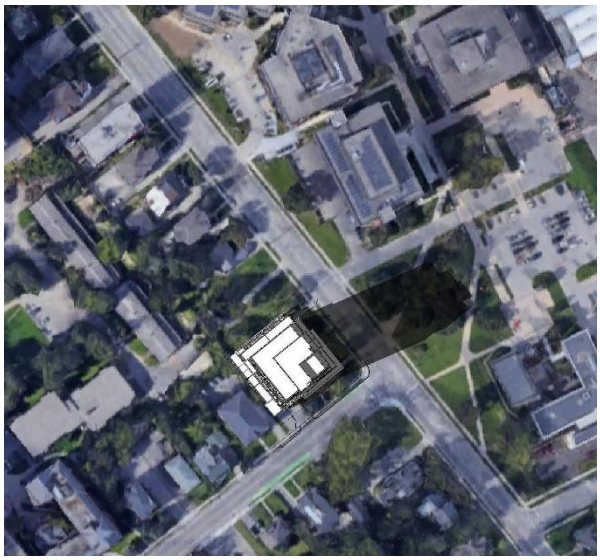


Figure 12 – June 21 @ 2pm

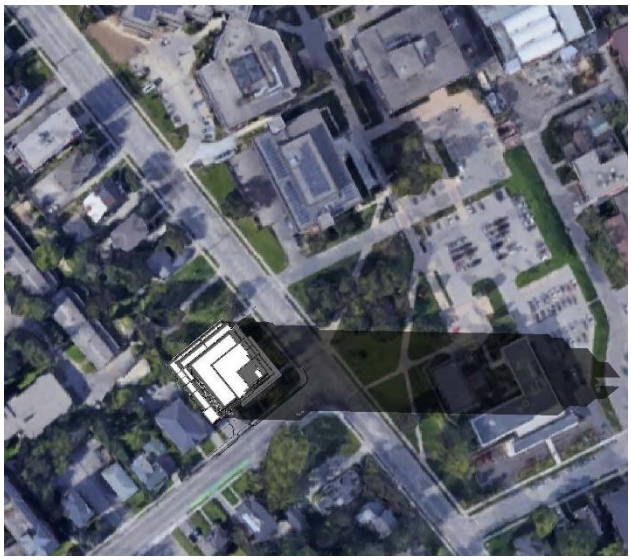


Figure 13 – June 21 @ 4pm



Figure 14 – June 21 @ 6pm

2. FALL SHADOW DIAGRAMS

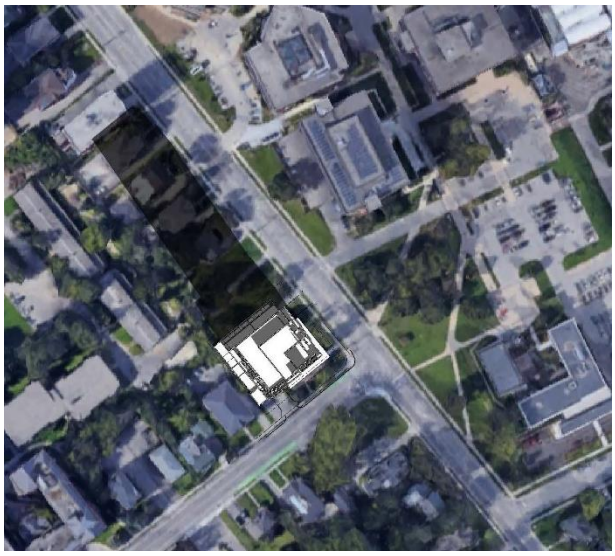


Figure 15 – September 21 @ 10am

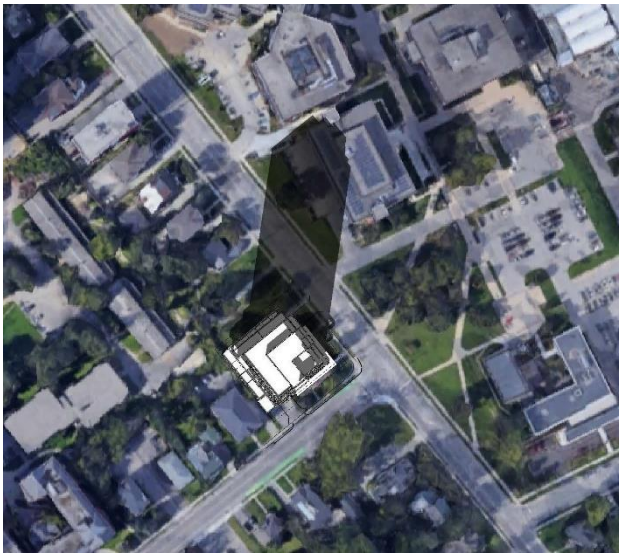


Figure 16 – September 21 @ 12pm

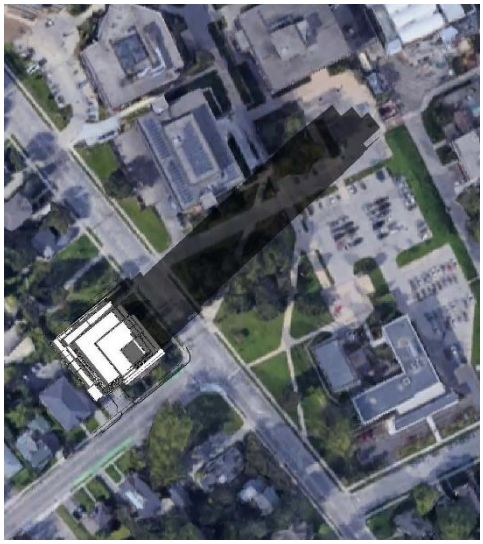


Figure 17 – September 21 @ 2pm

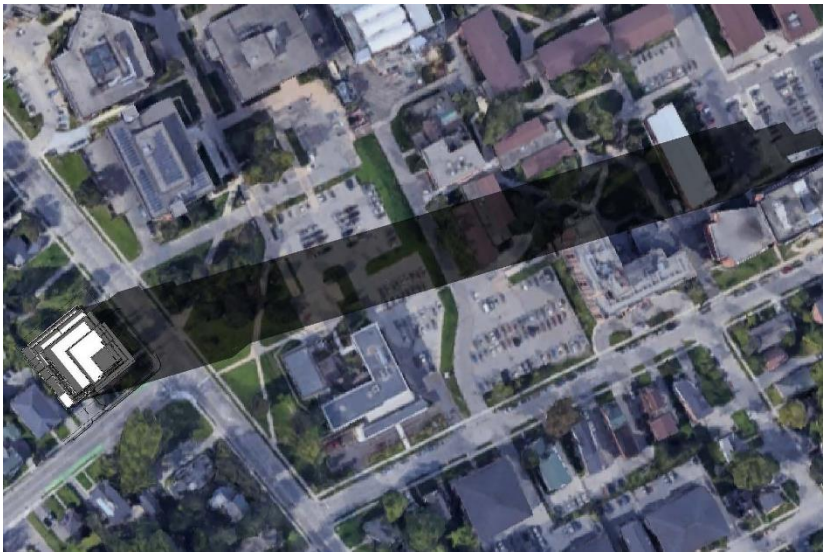


Figure 18 – September 21 @ 4pm

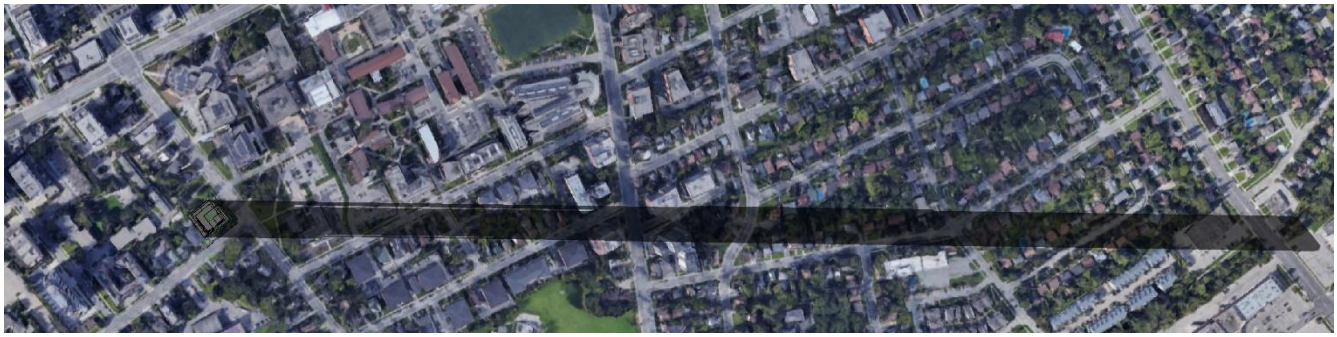


Figure 19 – September 21 @ 6pm

3. WINTER SHADOW DIAGRAMS

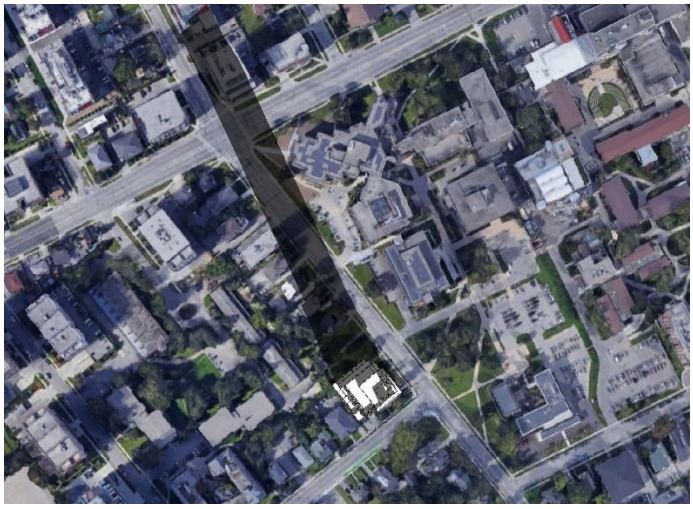


Figure 20 – December 21 @ 10am

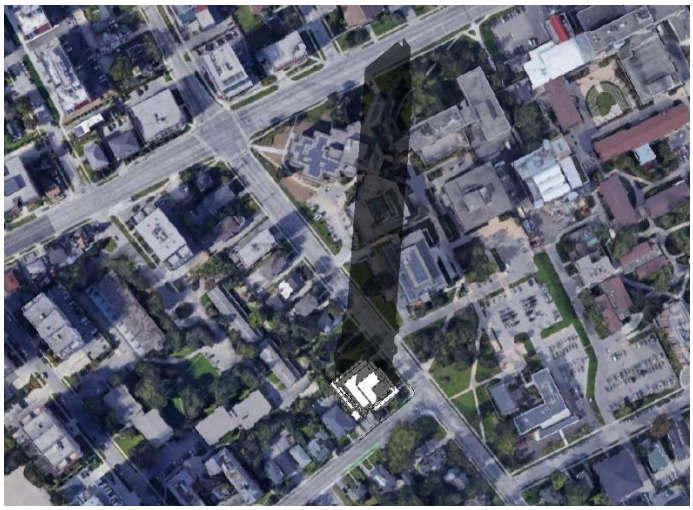


Figure 21 – December 21 @ 12pm

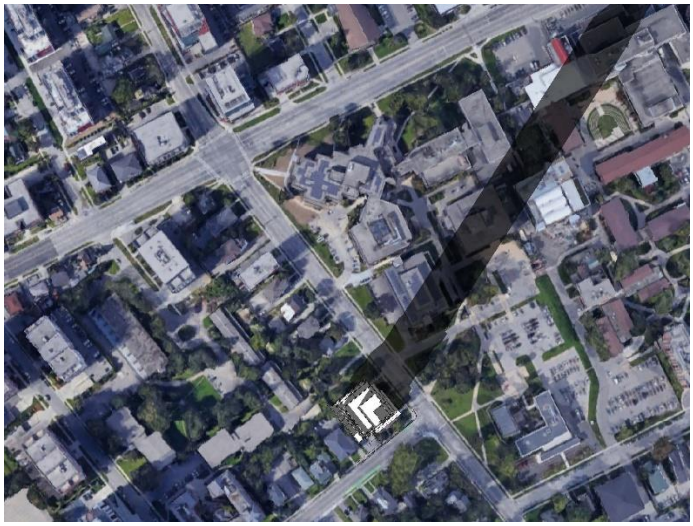


Figure 22 – December 21 @ 2pm

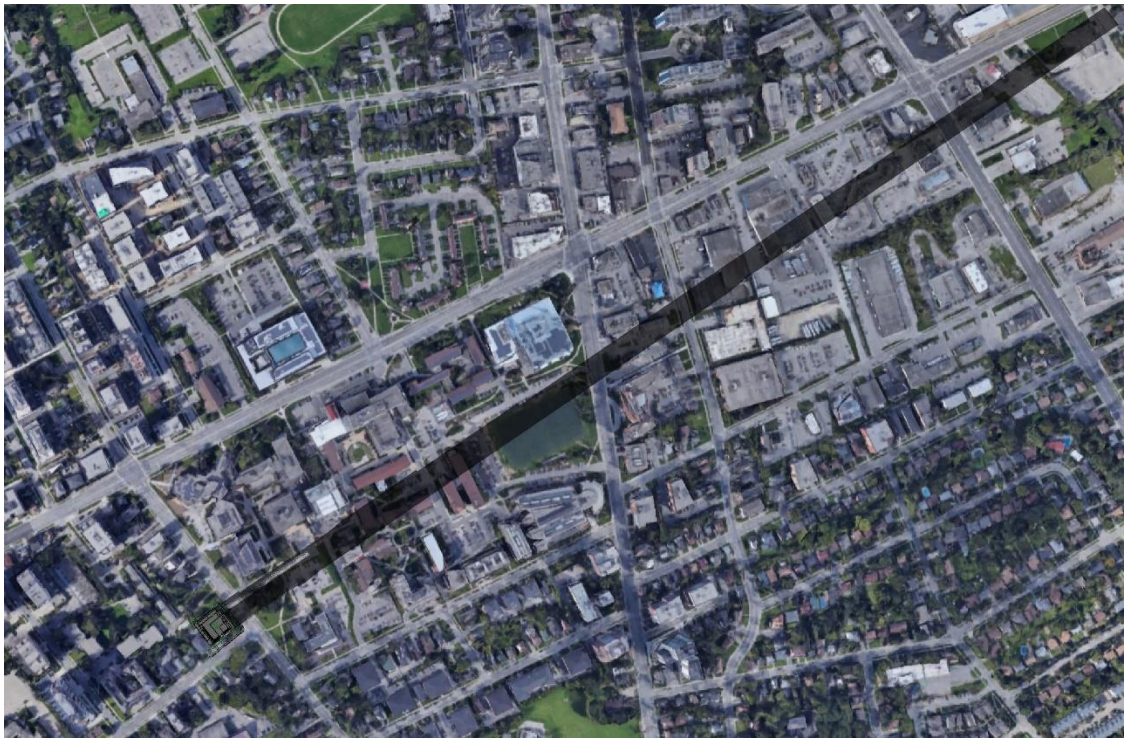


Figure 23 – December 21 @ 4pm



Figure 24 – December 21 @ 6pm