



Planning Justification Report

PREPARED FOR:

Official Plan and Zoning By-Law Amendment
Modern Real Estate Development
87-95 Seagram Drive

File no. 15200I

December 2025



PLANNING
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1.0 Introduction

1.1 Overview

McNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") has been retained by Modern Real Estate Development (the "Owner") to provide planning justification in support of an application for an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) to facilitate a high-rise mixed-use development on lands municipally addressed as 87, 89, 91, 93 and 95 Seagram Drive, Waterloo (the "subject lands"). The purpose of this Planning Justification Report is to provide a planning summary and analysis of the relevant policy framework, planning considerations, and technical studies.

The subject lands are situated within a Protected Major Transit Station Area (Laurier-Waterloo Park Station, an ION light rail transit station), are located in proximity to Waterloo Park, and are generally located in proximity to facilities and residences associated with Wilfred Laurier University and the University of Waterloo. The subject lands comprise a total of approximately 3444 square metres (0.344 hectares prior to road widening dedications and 0.319 hectares after road widening dedications) and have approximately 85.55 metres of frontage on the south side of Seagram Drive, to the west of Albert Street. The subject lands currently contain five low-rise residential buildings which are proposed to be demolished as part of the site's redevelopment.

The Owner is proposing to redevelop the subject lands as follows:

- Two 27 storey towers atop a shared 7 storey podium (plus a breezeway between the towers, overall building mass totalling 34 storeys);
- Five commercial units along Seagram Drive in the ground floor of the podium along Seagram Drive;
- Two levels of office space in the upper two levels of Tower 2;
- A total of 522 residential units including a mix of one, two, three and four bedroom units (total of 1,074 bedrooms);
- A total of 76 parking spaces, with 55 spaces located in the one level of underground parking and the remaining spaces located at-grade (to the rear of the building mass and primarily within the cantilevered structure);
- Vehicular and pedestrian access from Seagram Drive;
- A total of 540 Type 'A' (indoor or secure) bicycle parking spaces (1.03 per unit) and 20 Type 'B' (temporary) bicycle parking spaces; and
- Approximately 2,704 square metres of amenity space between outdoor areas (podium rooftop and balconies) and indoor spaces (including lounges, a fitness area, and a study area).

The planning merits of this proposal are evaluated within this Report and are summarized below:

- The project supports the redevelopment of lands within a Protected Major Transit Station Area (PMTSA) that are designated for high density residential, office and commercial uses;

- The site is appropriate for the proposal considering its physical characteristics and its location within a mixed-use area in proximity to residential uses, existing offices, retail/service commercial uses, institutional uses, parks, and public transit services;
- The massing, orientation and articulation of the proposed high-rise development is designed: to be compatible with surrounding land uses, to complement the local development context and to promote a compact, efficient development;
- The number and range of apartment units would broaden housing choice within the Central District and respond to market demand. In effect, this project would help the City accommodate its forecasted population growth and achieve its projected housing requirements;
- The commercial uses planned for the ground floor would compliment the local development setting, and with consideration for the office uses planned in the top floors of Tower 2, would contribute to the establishment of a complete community;
- Preliminary assessments indicate that existing road network can accommodate the proposed development and that adequate servicing infrastructure is available to service this project; and
- In our opinion, this proposal: is consistent with the Provincial Planning Statement (PPS, 2024), conforms to the Region of Waterloo Official Plan and conforms to the principles and policies of the City of Waterloo Official Plan.

1.2 Report Framework

This Planning Justification Report assesses the proposal in the context of the applicable planning framework and includes:

- An introduction and general description of the subject lands, surrounding land uses and existing conditions;
- A summary of the concept plan prepared for the site;
- An overview of the proposed development and proposed OPA and ZBA;
- A review and summary of technical reports prepared in support of the proposal; and
- An assessment of the proposal relative to the policy framework of the PPS, the Region of Waterloo Official Plan, the City of Waterloo Official Plan, and the regulations of the City's Zoning By-law.

1.3 Planning Applications

The subject lands are currently designated High Rise Residential in the City's Official Plan (as amended by Official Plan Amendment (OPA) 58, approved by the Ministry and Municipal Affairs on December 16, 2025) and are zoned Residential Mixed-Use-81 (RMU-81) and University College-81 (UC-81) pursuant to Zoning By-law 2018-050. In order to permit the proposed redevelopment, an OPA and ZBA are required, generally as follows:

- Official Plan Amendment (OPA): The proposed land uses are permitted; however, an Amendment to the Official Plan is required to permit the proposed height (34 storeys). An analysis of the OPA is included in **Section 5.3** of this Report.
- Zoning By-law Amendment (ZBA): The subject lands are zoned RMU-81 and UC-81. The RMU-81 zone generally permits the proposed development (requires amendments for the building height, density, landscaped open space, location of ancillary uses, etc., as detailed herein).

Through discussions with City staff, a revised RMU-81 zone is proposed for the subject lands to implement the proposed development. A full analysis of the proposed ZBA is included in **Section 5.5** of this Report.

A Pre-Submission Consultation meeting was held for the redevelopment of the subject lands on July 26, 2024 with municipal staff and Masri O Architects. As set out in the Record of Consultation issued for the proposal, the following plans and reports have been prepared in support of the project and are enclosed with the Application:

- Notice of Source Protection Plan Compliance;
- Property Survey or Existing Conditions Plan (Topographic Survey);
- Concept Plan;
- Building Elevations Drawings and Renderings;
- Floor Plans including sample unit layouts;
- Preliminary Grading Plan;
- Planning Justification Report;
- Urban Design Brief;
- Sun/Shadow Study;
- Wind Study;
- Energy Study;
- Functional Servicing and Stormwater Management Report (with Servicing Design Calculations);
- Geotechnical Report (including Hydrogeological Assessment);
- Noise Study;
- Traffic Impact Study;
- Tree Preservation/Protection Plan;
- Letter of no objection from Nav Canada; and
- Aeronautical Assessment Form to Transportation Canada.

This Report has been prepared in accordance with the City's Terms of Reference for Planning Justification Reports. A brief summary of the technical reports and plans is included in **Section 4.0** of this Report.

2.0 Site Description and Surrounding Land Uses

2.1 Site Description

The subject lands comprise five properties that are municipally addressed as 87, 89, 91, 93 and 95 Seagram Drive, Waterloo (Location Plan is included as **Figure 1**). The legal descriptions of the properties are as follows:

- 87 Seagram Drive (PIN: 22377-0158): Plan 507 Lot 27, City of Waterloo.
- 89 Seagram Drive (PIN: 22377-0481): Plan 507 Part Lot B, City of Waterloo, Registered Plan 58R21898 Part 5.
- 91 Seagram Drive (PIN 22377-0160): Plan 507 Part Lot 52, City of Waterloo, As in G30096, Except 157380, City of Waterloo.
- 93 Seagram Drive (PIN: 22377-0479): Plan 507 Part Lots 52 and 53, City of Waterloo, Registered Plan 58R21898 Part 3.
- 95 Seagram Drive (PIN: 22377-0477): Plan 507 Part Lots 53 and 54, Registered Plan 58R21898 Part 1, City of Waterloo.

The subject lands are located on the south side of Seagram Drive, west of Albert Street and opposite the terminus of Lester Street. The consolidated lands are rectangular in shape, with approximately 85.55 metres of frontage along Seagram Drive and an area of approximately 3,444 square metres (0.344 hectares prior to the road widening dedication, and 0.319 hectares after the dedication). The subject lands currently contain five low-rise residential buildings (single detached dwellings and a 6-plex building) that are proposed for demolition. Each of the properties have individual access points to Seagram Drive, with the easternmost building containing multiple units with surface parking in front of the building. The subject lands include some trees and shrubs generally along the west and south boundaries.



Image 1: Existing development on subject lands (Google Street View, May 2025).

2.2 Context

The surrounding area primarily consists of residential uses, academic-related uses and recreational uses. The University of Waterloo (UW) and Wilfrid Laurier University (Laurier) have lands on Seagram Drive, with Laurier having lands opposite the subject lands (including a four-storey student residence) and UW having lands located to the northwest. The lands to the east predominantly include residential uses, including a six-storey residential dwelling immediately adjacent to the subject lands. The lands to the west include the Waterloo Park with the Granite Club and surface parking. Laurier's University Stadium is located to the rear of the lands.

The lands are also in proximity to commercial areas on King Street and University Avenue, both of which include retail uses, restaurants, and service commercial uses. The Laurel Trail is located to the west and provides a connection to the north and south, including access into Uptown Waterloo. Furthermore, the UW and Laurier campuses are within a short walk of the subject lands.

Nearby recent development applications include:

- 177-179 Albert Street (Z-24-03, OPA 52): An approved OPA and ZBA generally for the development of a 30 storey mixed-use building with a density of 2,885 bedrooms per hectare (includes affordable housing);
- 155 University Avenue West (Z-23-10): An approved ZBA generally for the development of a 12 storey student residence containing 510 units;
- 249 to 253 Sunview Street (Z-24-02, OPA 51): An approved OPA and ZBA generally for the development of a 13 storey residential building with 131 units (all one bedroom units).

Seagram Drive is characterized as a local road that provides a connection between Albert Street and University Avenue. Seagram Drive currently has one lane of traffic in either direction, separated cycling lanes on both sides, a sidewalk on each side and landscaped boulevards between the sidewalk and curb. Hydro poles and streetlights are located on the north side of the street.

The subject lands are well served by existing transit, including the following:

**Light Rail Transit
(ION Route):**

The Laurier-Waterloo Park ION Station (light rail transit, LRT) is located approximately 280 metres to the west (easily accessible by existing pedestrian and cycling infrastructure). The LRT offers service generally along the King Street corridor between Conestoga Mall and Fairway Station and includes connections to ION bus, iXpress, and local bus routes operated by Grand River Transit.

iXpress Route:

The iXpress includes service throughout the Region and includes service along University Avenue West to the north of the subject lands.

Grand River Transit:

Route 12 (Westmount): Operates between the Fairway Station and the intersection of University Avenue and King Street, generally to the west of the King Street corridor.

Route 29 (Keats-University): Operates between the Boardwalk Station and Conestoga Station, including service along University Avenue.

Route 7 (King): Operates between Fairway Station and Conestoga Station, generally along King Street.

Route 91 (Late Night Loop): Operates Thursday to Saturday from Queen Station in downtown Kitchener to the University of Waterloo Station.

A Context Plan is included as **Figure 2. Table 1**, below, summarizes the mix of uses in the immediate vicinity of the subject lands:

Table 1: Surrounding Land Uses

Relative Location	Existing Land Uses
North:	<p>Seagram Drive with one lane of traffic in either direction, separated bicycle lanes in either direction, and sidewalks on both sides.</p> <p>Waterloo College Hall (Laurier residence), Laurier Place, and Laurier Academy of Music and Arts on the opposite side of Seagram Drive.</p> <p>Lester Street, a local road with sidewalks on either side, opposite the subject lands and connecting to University Avenue.</p> <p>Mid- and high-rise residential buildings (primarily privately-owned student residences) along Lester Street.</p> <p>UW campus to the northwest, including student residences.</p> <p>University Avenue with two lanes of traffic in either direction, separated and buffered cycling lanes, sidewalks on either side, transit stops, and commercial uses.</p>
East:	<p>Low- to mid-rise residential buildings (primarily student residences) along Seagram Drive, including a six-storey building immediately adjacent to the subject lands.</p> <p>Albert Street with a lane of traffic in either direction, shared cycling lanes to the south and separated and buffered cycling lanes to the north, as well as sidewalks on either side.</p> <p>Main campus of Laurier in Waterloo, including institutional buildings, residences, commercial uses, parks and athletic facilities.</p>
South:	<p>Laurier's University Stadium (athletic field) with surface parking.</p> <p>Waterloo Park with walking trails, open space, cultural attractions, and athletic facilities.</p>
West:	<p>Granite Club (curling rink) with surface parking.</p> <p>Laurier-Waterloo Park Station (ION LRT, travelling between Conestoga Station in Waterloo and Fairway Station in Kitchener).</p>

Laurel Trail (multi-use trail, travelling between Uptown Waterloo and Columbia Lake through the University of Waterloo).

The subject lands are identified as being within a Wellhead Protection Sensitivity Area (WPSA 8) and are within the area covered by the Grand River Source Protection Plan. A review of source water protection policies has been included within this Report and a Section 59 Notice has been included with this submission.



Data Source: Google Satellite Imagery 2022

Figure 1 - Location Plan


 Subject Lands





Figure 2 - Context Plan

- Subject Lands
- MacGregor-Albert Heritage District
- Walking Distances (400m and 800m)
- ION Stops
- iXpress Stops
- GRT Stops
- ION Route
- iXpress Route
- GRT Transit Routes
- Trails
- Parks



3.0 Description of Proposal

Masri O Architects Inc. has prepared a conceptual site plan (Concept Plan) for the proposed redevelopment of the subject lands. The Concept Plan, as well as the architectural design package, is included in **Appendix A** of this Report. The key components of the Concept Plan are as follows:

- Two 27-storey towers that are situated on a shared 7-storey podium (with an 8th storey breezeway between the base of the towers, with the overall building mass totaling 34 storeys), providing a total of 522 apartment units in a range of one (220), two (72), three (210) and four (20) bedroom unit configurations (total of 1074 bedrooms). The two towers have been designed with floor plates of 617 square metres and have a separation of 21.0 metres between them;
- The shared podium connecting the two towers has a 7-storey height (plus breezeway), a floor plate of 2085 square metres (ground level) with a partially cantilevered second storey, includes five commercial (retail) units at-grade oriented to Seagram Drive with a mezzanine (counted as a storey) and residential units above, and includes an 8th storey breezeway connecting the amenity areas in the base of the towers;
- Two upper levels of office space within Tower 2 (levels 33 and 34);
- A total of 2704 square metres of amenity space with 917 square metres of that space being for balconies, 1041 square metres being outdoors (rooftop) and 746 square metres being indoors, generally as follows:
 - Indoor amenity areas are located in the first storey of the podium, in the mezzanine (second storey), and on the 8th floor (first level of the towers) and abut the outdoor amenity area located on top of the podium. Indoor amenity areas include meeting rooms, work space, lounges, a movie room, a games room and a fitness room and are connected via a breezeway between the two towers.
 - A central outdoor amenity area on top of the podium that includes a pickleball court and seating.
- Two vehicular entrances into the site, with the easterly entrance providing access to the at-grade parking (within/to the rear of the building mass) and the loading space that is cantilevered under the second level of the podium and the westerly entrance providing access to the one level of underground parking;
- A total of 76 parking spaces (including four accessible spaces) within one level of underground parking (55 spaces) and the remaining spaces (21 spaces) at-grade to the rear of the building mass and primarily within the cantilevered structure;
- 540 secure (Type A) bicycle parking spaces within the underground parking and mezzanine and 20 temporary (Type B) bicycle parking spaces in front of the building; and
- Direct sidewalk connections from the lobbies and commercial areas of the building to Seagram Drive.

Urban design considerations related to the proposed development are set-out in the Urban Design Brief (prepared by MHBC) included with the Application submission. Furthermore, the development will be connected to existing sanitary, water and storm sewers, as detailed in the Functional Servicing and Stormwater Management Report (prepared by MTE) also included with the submission.

Tables 2 and 3, below, summarize the proposed density of the redevelopment.

Table 2: Residential Density Summary

Unit Type	Number of Units and Density
Multiple Residential Units	522
Number of Bedrooms	1074
Residential Land Area (Before Road Widening)	0.344 ha
Residential Density (Before Road Widening)	1,518 units/ha
	3,123 bedrooms/ha
Residential Land Area (After Road Widening)	0.319 ha
Residential Density (After Road Widening)	1,637 units/ha
	3,367 bedrooms/ha

Table 3: People and Jobs Density Summary

Unit Type	People Per Unit (PPU) **	Number of Units	Number of People
One Bedroom	1.25	220	275
Two Bedroom	2.22	72	160
Three Bedroom	2.22	210	467
Four Bedroom	4.31	20	87
Total People			989
Jobs	GFA per Employee ***	Total GFA	Number of Jobs
Commercial Employment	450 sq.ft. per employee	5,661.82 ft ² (526 m ²)	13
Office Employment	225 sq.ft. per employee	8,611.13 ft ² (800 m ²)	39
Total Jobs			52
Total People and Jobs			1041
People and Jobs per Hectare Before Road Widening			3,027
People and Jobs per Hectare After Road Widening			3,264

**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.*

4.0 Summary of Supporting Studies

The following reports were requested through the Pre-Consultation process to support the OPA and ZBA Application. A brief summary of the findings of each report has been provided below.

4.1 Urban Design Brief

MHBC has prepared an Urban Design Brief (December 2025) in support of the proposed Application. The Urban Design Brief includes a review of the existing conditions, planning policy and design objectives for the public and private realms in accordance with the City's Terms of Reference for urban design briefs. The Brief concludes that the proposed development incorporates a high-quality of urban design through the following:

- Creating a compact, mixed-use urban development that provides a more efficient use of land and infrastructure, as well as aligns with the transit-supportive goals of the MTSA;
- Developing a well-defined podium that addresses the public realm and provides clear connections between the sidewalk and building entrances;
- Creating an active streetscape along Seagram Drive with ground floor commercial units;
- Providing abundant bicycle parking and barrier free pedestrian connections to promote active transportation; and,
- Utilizing a façade design and material palette that compliments the surrounding context.

The Brief furthermore concludes that the proposed Application reflects the intent, policies, and guidelines of the City of Waterloo Official Plan (including OPA 58) and Urban Design Manual, and represents good urban design.

4.2 Shadow Study

Masri O has prepared a Shadow Study (dated 2025) to review the shadows generated by the proposed development. The analysis illustrates shadowing in the spring (March 21), summer (June 21), fall (September 21), and winter (December 21), at one-hour time increments. The following is generally concluded based on the review:

- The spring and fall shadows cast by the proposed building during the late morning and early afternoon hours affect the properties across the street; however, these properties are not shadowed by more than 50% or for more than four, 1-hour intervals, and they continue to receive full sun outside of the timeframe mentioned;

- The spring and fall shadows after 6:00pm appear dramatic due to the low sun angle but pose no tangible concern due to the time of day; and
- Shadows in the winter appear long throughout the day but move quickly across the affected properties which are therefore not exposed to excessive shadowing.

The Study generally concludes that the shadows generated by the proposed development will not shade 50% or more of neighboring properties, sidewalks or yards for more than four interval times (a four-hour equivalency) and that no mitigation measures are recommended.

4.3 Wind Study

A Pedestrian Wind Study has been prepared by SLR Consulting Ltd. (December 18, 2025). The primary objective of the Study is to inform decisions related to the building form and its influence on pedestrian comfort. The Study provides the following conclusions in Section 5.0:

- The wind safety criterion is generally met in all areas assessed in both the Existing Configuration and the Proposed Configuration on an annual basis. The two exceptions are at the southwest corner of the building at grade, and on the Level 7 amenity terrace. Recommendations are provided.
- Existing wind comfort conditions on-site and surrounding are comfortable for the intended use.
- With the proposed development in place, wind conditions on-site are generally suitable for the intended use, including the building entrances and exits. Recommendations are provided for the entrance to the West Tower.
- Wind comfort conditions on the Level 7 amenity terrace are suitable for the intended use.
- In both the Existing Configuration and Proposed Configuration wind comfort conditions on the surrounding sidewalks are comfortable for the intended use.
- SLR will work with the design team to develop practical and effective wind control measures as the design progresses for a few key areas.

Pursuant to the above, the following recommendations are provided in Section 4.4:

1. "To improve the safety conditions near the southwest building corner, we recommend installing a 2.2 m tall wind screen that is no more than 30% open between the bays along the west side of the loading space, to provide local wind shelter."
2. "On the north part of the Level 7 amenity terrace, the design team is planning to include a pickleball court that is surrounded by chain link fencing. We recommend the fences that run east-west (per project north) to be at least 2.2 m tall, and no more than 30% open. This can be achieved through the addition of a mesh screen interwoven or attached the fence."

Overall, the Study concludes that the wind safety criterion is generally met in all areas in the context of the proposed development with the exception of the two aforementioned areas which can be mitigated. It is our understanding that the recommendations have been implemented in the updated Concept Plan and will be further refined through detailed site plan design.

4.4 Energy Study

Masri O has prepared an Energy Conservation Brief (dated 2025) to review the proposed development's design features related to sustainability, energy savings and aspects of the development vision. The goals for the development as set out in the Brief are generally as follows:

- Reduction of Energy Use: Targeting performance 25% better than the Ontario Building Code through high-performance building envelope and mechanical systems.
- Reduction of Carbon Footprint: Use of electricity as the primary and clean source of energy, and support of alternate modes of transportation, thereby reducing carbon emissions for the life of the building.
- Use of Alternate Modes of Transportation: The building's location near the LRT station will encourage transit use, walking, and cycling; reducing reliance on private vehicles and lowering residents' carbon footprint.
- Support of Urban Lifestyle: based on compact living with reliance on shared and nearby amenities.
- Durable and Efficient Construction: Using modular off-site construction methods for systems that include precast concrete, interior partition walls, millwork and cabinets, etc.
- Sustainable Low-Impact Site Design: Water conservation and stormwater management are addressed through low-flow fixtures, drought-tolerant landscaping, and on-site stormwater control systems.

The strategies to meet the above goals are set-out in the Energy Conservation Brief. The Brief concludes that the proposed development's energy savings targets are "aggressive and will result in a highly technical sustainable building suited for the evolving needs of urban cities of the future."

4.5 Functional Servicing and Stormwater Management Report

MTE Consultants Inc. has completed a Functional Servicing and Stormwater Management Report (FSSMR, dated December 15, 2025) for the proposed development to review the opportunities and constraints for the subject lands with respect to servicing, grading, and stormwater management and to demonstrate the functional serviceability of the lands. The Report concludes the following:

- The proposed grading design will respect the natural topography of the site to achieve a reasonable cut/fill balance where possible;
- Existing municipal infrastructure for water, sanitary, and storm is available within the Seagram Drive right-of-way and will be utilized to service the proposed development;
- The expected maximum day domestic water demand for the site is 6.39 L/s. Based on preliminary analysis, the maximum OBC fire flow demand is estimated to be 9,000 L/min (150L/s) and the existing municipal hydrant can provide adequate pressure for fire protection. These flow rates are provided to the City for inclusion in their water system model and confirmation of available capacity.

- The expected peak sanitary flow rate from the site is 11.1L/s. This flow rate is provided to the City for inclusion in their model to evaluate available capacity and determine if any downstream constraints exist within the existing municipal sanitary system.
- The stormwater management criteria can be satisfied with the implementation of onsite controls for water quantity and water quality.
- Additional grading, servicing and stormwater management details will be provided during detailed design.

The Report generally provides information for the City to evaluate their system capacities for water and sanitary services and concludes that existing municipal storm, sewer and water infrastructure is available within the adjacent right-of-way, that stormwater management criteria can be satisfied with onsite controls, and that additional information related to grading, servicing and stormwater will be provided during the detailed design.

4.6 Geotechnical Investigation

A Geotechnical Investigation has been completed by Chung & Vander Doelen Engineering Limited (CVD) to provide information and recommendations for the design and construction of the proposed development, including a characterization of the soil and groundwater conditions (hydrogeological study). The findings of this investigation are detailed in the Geotechnical Investigation report, dated December 17, 2025, which includes commentary regarding foundation design, backfilling, shoring and site servicing.

4.7 Environmental Noise Assessment

An Environmental Noise Assessment has been completed by SLR Consulting (Canada) Limited (dated December 15, 2025) to examine the potential for impacts of the environment on the proposed development, impacts of the proposed development on the environment and impacts of the proposed development on itself and to provide recommendations for the same. The Assessment generally provides the following conclusions:

- Impacts of the environment on the proposed development can be adequately controlled through the feasible mitigation measures, façade designs, and warning clauses detailed in Part 1 of the report;
- Impacts of the proposed development on the surrounding area are anticipated to be negligible and can be adequately controlled by following the design guidance outlined in Part 2 of the report;
- Impacts of the proposed development on itself are anticipated to be negligible and can be adequately controlled by following the design guidance outlined in Part 3 of the report; and
- As the mechanical systems for the proposed development have not been designed at the time of the assessment, the acoustical requirements above should be confirmed by an Acoustical Consultant as part of the final building design.

It is our understanding that further assessment will take place and be further considered at the detailed design phase as more information becomes available.

4.8 Traffic Impact Study

A Transportation Impact Study (dated December 2025) has been prepared by Paradigm Transportation Solutions Limited to identify and assess transportation impacts resulting from the proposed development. The findings of the Study are generally as follows:

- The study area intersections operate within acceptable levels of service, with problem movements at the intersection of Albert Street and Seagram Drive (existing capacity issue);
- As traffic volumes increase (background conditions), the existing capacity issues at the intersection of Albert Street and Seagram Drive will continue to occur with the addition of the site generated traffic;
- Westbound left-turn lanes on Seagram Drive at the two proposed site driveways are not warranted; and
- Traffic control signals are not justified at Albert Street and Seagram Drive under future total traffic conditions and an eastbound left-turn lane on Seagram Drive at Lester Street is not warranted under future total traffic conditions.

The Study generally concludes that the development can be approved with no requirement for offsite transportation measures and directs that the City of Waterloo monitor the traffic and pedestrian volumes at the intersection of Albert Street and Seagram Drive given the aforementioned existing problem movements at the intersection.

4.9 Tree Management Plan

Hill Design Studio Inc. has prepared a Tree Management Plan (December 15, 2025) which indicates which trees will be removed and which trees will be retained in the development of the site. The Plan indicates measures for protection for trees to be retained and notes a requirement for the receipt of letters of approval for removal of boundary trees.

5.0 Planning Analysis

The following discussion outlines how this Application considers and addresses relevant policies of the PPS, the Region of Waterloo Official Plan, the City of Waterloo Official Plan, and the regulations of the City of Waterloo Zoning By-law.

5.1 Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS) was issued under Section 3 of the *Planning Act* and came into effect on October 20, 2024. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development, and sets the policy foundation for regulating the development and use of land. Generally, Chapter 1 of the PPS details that this policy instrument provides a vision for land use planning in Ontario that: prioritizes growth in urban and rural settlements; prioritizes compact and transit-supportive design, where locally appropriate; and optimizes investments in infrastructure and public service facilities to support convenient access to housing, employment, services and recreation.

The proposal has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Chapter 2 (Building Homes, Sustaining Strong and Competitive Communities) and Chapter 3 (Infrastructure and Facilities) are particularly relevant to this proposal. The following is an analysis of the proposed development in the context of the policies of the PPS.

5.1.1 Housing and Settlement Areas

Policy Review

Policy 2.1.6 sets out several policies to support the achievement of complete communities, including:

- "a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;
- b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and
- c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups."

Policy 2.2.1 requires planning authorities to provide for an appropriate range and mix of housing options and densities to meet the projected needs of current and future residents by way of a series of policy directions, including:

- "b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and well being requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;
- c) promoting densities for new housing 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, including potential air rights development, in proximity to transit, including corridors and stations.”

Policy 2.3.1.1 directs that settlement areas are to be the focus of growth and development, with strategic growth areas, including MTSAs, as focal points. **Policy 2.3.1.2** further prescribes that land use patterns within settlement areas are to be based on a density and mix of uses that achieve several objectives, including:

- “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;”

Additional direction regarding growth and development is provided in **Policy 2.3.1.3**, which directs planning authorities to support intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options.

Policy Analysis

Given the following key considerations, it is our opinion, the Application is consistent with the direction set out in the referenced policies of Chapter 2:

1. In our opinion, the Application would positively contribute to the achievement of complete communities by permitting a mixed-use high-density development, including a variety of housing options with commercial and office space, in a location with access to employment, shopping areas, institutional uses, recreational uses, parks and transit services that is generally planned to accommodate high-density development;
2. The Application contributes to housing choice to meet the needs of current and future residents by facilitating the provision of a range of unit sizes to meet the needs of a range of individuals and families in the area;
3. The proposed development supports compatible intensification, including through the provision of a seven storey podium (plus breezeway) that has regard for the character of the surrounding area (including the six storey building adjacent to the east and the four storey building opposite the subject lands);

4. The proposed density makes efficient use of lands within a settlement area and optimizes the use of transit and active transportation infrastructure in the vicinity; and
5. It is anticipated that residents and patrons of the development would contribute to the overall vitality of the neighbourhood.

5.1.2 Strategic Growth Areas

Policy Review

Growth and development are to be focussed in strategic growth areas (including MTSA) pursuant to **Policy 2.4.1.1** of the PPS. Pursuant to **Policy 2.4.1.2**, strategic growth areas are to be planned in accordance with the following to support the achievement of complete communities, a mix of housing options and intensification:

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

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** of the PPS. **Policy 2.4.2.6** further provides that all MTSA should be planned and designed to be transit-supportive and to achieve multi-modal access to stations and connections to nearby major trip generators, in part, by providing infrastructure that accommodates a range of mobility needs and supports active transportation.

Policy Analysis

The proposal will support the intensification of lands for a high-density mixed-use development within a MTSA that are currently used for low-density residential uses. The proposed development will contribute to the minimum density target over the MTSA through the provision of housing and employment opportunities and will support the achievement of complete communities, as previously discussed. Coupled with the provision of affordable housing units, the proposed development will support the housing needs of a range of individuals and families.

5.1.3 Climate Change

Policy Review

Section 2.9 addresses energy conservation, air quality, and climate change, requiring planning authorities to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through a number of initiatives, including the following:

“a) support the achievement of compact, transit-supportive, and complete communities...

d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality.”

Policy Analysis

In response to the above, the proposed Application facilitates the development of the subject lands for a high-density mixed-use with a compact and transit-supportive urban form and density that supports the efficient use of land, infrastructure and services in the City’s settlement area. An Energy Conservation Brief has also been submitted with the Application which provides a review of the proposed development’s design features related to sustainability and energy savings.

5.1.4 Infrastructure

Policy Review

The policies in **Section 3.1** provide general direction regarding the provision of planning for infrastructure and public service facilities. The policies generally require the efficient use of existing water, storm water, sanitary sewer, and transportation infrastructure. New developments are encouraged to utilize and support existing municipal infrastructure and support and enhance existing and planned transportation networks and corridors.

Policy 3.2.2 provides that efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible. Policy 3.9.1 further provides that healthy, active and inclusive communities should be promoted, in part, by:

“a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity.”

Policy Analysis

The proposed development provides a compact form that would optimize the use of existing and planned infrastructure and public service facilities within the strategic growth area. Moreover, the development proposal represents the efficient use of existing infrastructure, with the Functional Servicing and Stormwater Management Report concluding that the development can be accommodated by existing civil infrastructure.

The proposed development will establish additional residential and employment density in proximity to rapid transit and existing active transportation routes, including bicycle lanes along Seagram Drive. Sufficient opportunities exist to support a range and mix of transportation modes. This form of development and mix of uses supports the overall objectives of the PPS, will contribute to minimizing vehicle trips, and will encourage active transportation and transit use in the area. The subject lands are within proximity to many nearby amenities and commercial services that can be accessed without the use of a vehicle. Various transportation demand management measures are proposed or can be implemented, such as secure bicycle parking and unbundled parking.

5.1.5 Public Spaces

Policy Review

Section 3.9 of the PPS speaks to the promotion of healthy, active, and inclusive communities. The policies encourage the planning of public streets, spaces and facilities to be safe, meeting the needs of pedestrians, fostering social interaction and facilitating active transportation and community connectivity.

Policy Analysis

The proposed development will include sidewalk and driveway connections from Seagram Drive to the proposed development and will be designed to encourage walking and cycling (including through connections to the active transportation network and the provision of secure bicycle parking). The proposed development will have several indoor and outdoor amenity spaces, providing opportunities for active and passive recreation, and is nearby public open spaces (including Waterloo Park).

5.1.6 Summary

In light of these considerations and our broader evaluation of this proposal relative to the policies of the PPS, it is our opinion that the Application and proposed development is consistent with this policy document.

5.2 Region of Waterloo Official Plan

The Regional Official Plan ("ROP") was approved by the Ministry of Municipal Affairs and Housing with modifications on December 22, 2010, and approved, with amendments by the Ontario Municipal Board on June 18, 2015. Amendment No. 6 to the ROP was approved on April 11, 2023 by the Ministry of Municipal Affairs and Housing. As of January 1, 2025 pursuant to Bill 23, the ROP became an Official Plan of each area municipality. Until the policies in the ROP are repealed or amended, they will continue to apply and be the responsibility of each area municipality to enforce, and as such, the City of Waterloo is responsible for reviewing conformity with the ROP.

The ROP outlines a vision for growth and development within the Region of Waterloo and establishes a number of general policies to plan and manage growth and implement provincial land use policy.

The following outlines the applicable schedules of the ROP:

- Map 1 (Regional Structure): Urban Area (**Figure 3**);
- Map 2 (Urban System): Delineated Built-Up Area, within a MTSA (boundaries are more clearly delineated on Figures 4a to 9d) (**Figure 4**);
- Map 6A (Urban Area Source Water Protection Areas): Wellhead Protection Sensitivity Area-8 (**Figure 5**); and
- Figure 5A (Laurier-Waterloo Park Station): within the Major Transit Station Area (MTSA) (**Figure 6**).

5.2.1 Growth and Intensification

Sections 2.A and 2.C of the ROP support mixed-use, compact growth that reinforces transit and active transportation with an objective of creating 15-minute neighbourhoods and energy-efficient, resilient communities. Future development and policy planning is directed to contribute to the creation of 15-minute neighbourhoods through the provision of a broad mix of land uses that provide opportunities for residents to meet their daily needs for goods, services, and employment within a 15-minute trip through active transportation (and where other needs can be met by using direct, frequent and convenient transit).

Section 2.B of the ROP, as amended on April 11, 2023, provides that over 60% of the region's new residential growth is to occur within the Delineated Built-Up Areas of the cities and townships through intensification. As per Section 2.F, the majority of this growth will be directed to strategic growth areas, including MTSA's which are directed to prioritize intensification and higher densities to make efficient use of land and infrastructure and support transit viability.

The proposed development will assist the Region of Waterloo and City of Waterloo in achieving the minimum intensification target through the intensification of the subject lands within a Built-Up Area (see **Figure 4**) and within an MTSA (see **Figure 6**). The proposal will also contribute to the provision of 15-minute neighbourhoods by providing for a high-density mixed-use development in an established neighbourhood that is supported by active transportation and transit with nearby supportive uses (i.e. commercial, institutional, etc.).

5.2.2 Major Transit Station Areas

Map 2 (Urban System) and Figure 5A (Laurier-Waterloo Park Station) of ROP identifies the subject lands as being within the Laurier-Waterloo Park Station Area (MTSA, see **Figures 4** and **6**, respectively). Pursuant to Policy 2.D.2.1, MTSA's are lands typically located within a 500 to 800 metre radius of a rapid transit station, representing an approximately 10-minute walk. Table 2 of the ROP provides a minimum density of 95 people and jobs combined per gross hectare over the entire MTSA. Pursuant to Policy 2.D.2.4, MTSA's are to be planned to reinforce transit-supportive development, prioritize active transportation and transit usage, and provide for a broad mix of uses.

Section 2.D.6 of the ROP contains Transit-Supportive Development policies to be considered in the review of a development application on or near existing or planned rapid transit routes. The policies state that the Region and area municipalities shall apply the following criteria in reviewing development applications within strategic growth areas and other intensification areas:

- a) "Creates an interconnected, multimodal street pattern that prioritizes walking, cycling, and rolling, and taking transit over automobile trips, and supports vibrant mixed-use developments;
- b) Supports a more compact built form that locates the majority of transit-supportive uses within a comfortable walking distance of a transit stop or Major Transit Station Area;
- c) Provides an appropriate mix of land uses, including a range of food destinations, local services and amenities to meet peoples' daily needs for living;
- d) Promotes medium and higher-density development as close as possible to the transit stop to support higher frequency transit service and optimize transit rider convenience;

- e) Supports a high-quality public realm to enhance the identity of the area and create gathering points for social interaction, community events and other activities; and
- f) Provides access from various transportation modes to the transit facility, including consideration of pedestrian, bicycle parking, and where applicable, passenger transfer and commuter pickup/drop off areas.”

The proposed development will provide a mixed-use, high-density development within close proximity to the Laurier-Waterloo Park Station. Convenient pedestrian connections to the abutting active transportation network will be provided to ensure future residents and patrons have safe and convenient access to the LRT Station and secure bicycle parking will be provided in the proposal. Further, the subject lands are located in proximity to supportive uses that will allow the future users of the development to have the option to walk or cycle to a range of destinations, including commercial, employment and institutional uses.

The Application facilitates the intensification and redevelopment of a property within a MTSA for a high-density mixed-use proposal that contributes to the achievement of the density target for the MTSA and aligns with the principles of transit-supportive development. Accordingly, in our opinion, the proposal conforms with the transit-supportive policies.

5.2.3 Housing

Chapter 3 of the ROP provides policy direction for the livability of the Region to foster a high quality of life. Section 3.A provides that a diverse range and mix of housing options are encouraged to meet the needs of all residents, including a range of form, tenure, density, and affordability. The updated ROP encourages a range and mix of housing options and establishes an affordability target of 30% for new ownership and rental units (Policy 3.A.2).

Policy 3.A.15 provides criteria for the demolition of existing rental unit buildings with 6 or more units, including that comparable rental units be provided where replacement is permitted and that existing tenants be compensated in accordance with the *Residential Tenancies Act*, 2006 where demolition is permitted. In response to the criteria of Policy 3.A.15, the proposal includes the provision of comparable unit types (multiple unit building) to those demolished on 87 Seagram Drive (currently contains a 6-plex dwelling) and the owners will meet the requirements of the *Residential Tenancies Act* pertaining to the demolition.

The application provides a range of one to four bedroom units within a MTSA in conformity with the ROP’s goals of providing a range of housing types in areas that are well serviced by several modes of transportation, including transit. The proposal also provides affordable units to contribute to the achievement of the related housing objectives of the ROP.

5.2.4 Active Transportation

Sections 3.B and 3.C of the ROP (1) encourage the enhancement of cycling and pedestrian environments and (2) supports Transportation Demand Management strategies to reduce reliance on motor vehicles.

The proposed development has a compact form within the Built-Up Area (see **Figure 4**), is located in close proximity to transit, and fronts onto a road with cycling and pedestrian infrastructure. The proposal provides direct connections to the active transportation network on Seagram Drive and provides secure

bicycle parking for the residents as well as accessible bicycle racks for the visitors and patrons of the development. The proposal generally encourages active transportation modes, is transit-supportive, and provides limited vehicular parking to functionally meet the needs of residents, visitors and patrons of the development.

5.2.5 Energy Conservation and Air Quality

Sections 3.D and 3.E of the ROP provide that energy conservation is encouraged through the development of compact mixed-use development, re-urbanization, local sourcing of materials, and other tools to reduce greenhouse gas generation and improve air quality. An Energy Conservation Brief has been included with this submission and includes a review of the proposed development's design features related to sustainability, energy savings and aspects of the development vision. The Brief concludes that the proposed development's energy savings targets are "aggressive and will result in a highly technical sustainable building suited for the evolving needs of urban cities of the future."

5.2.6 Source Water Protection Areas

The subject lands are located within Wellhead Protection Sensitivity Area-8 (WPSA-8) as per Map 6A (Urban Area Source Water Protection Areas) of the ROP (see **Figure 5**). Section 8.A.10 of the ROP provides that the WPSA-8 designation delineates the area outside of the ten-year time of travel to the limit of the total land area contributing water to a municipal drinking-water supply well. Policy 8.A.18 provides that Category 'A' uses will not be permitted in the WPSA-8 designation and that geothermal wells, mineral aggregate operations and wayside pits and quarries may be permitted subject to further study. Pursuant to Schedule B (Source Water Protection Land Use Categories), Category 'A' uses generally include very high risk uses, including waste treatment and disposal facilities, salvage yards, and bulk storage of hazardous chemicals and hazardous substances.

Policy 8.3.3(7) of the City's Official Plan states that development applications within source water protection areas will be reviewed and considered in accordance with the source water protection policies in the Regional Official Plan.

Residential and mixed-use developments are permitted within the WPSA-8 designation, subject to the other policies of the ROP. A Section 59 Notice has been issued by the Region for this Application and is included with the submission materials.

5.2.7 Summary

The proposed development intensifies lands within the Built-Up Area and within a strategic growth area (Laurier-Waterloo Park MTSA), assisting with the achievement of the MTSA density targets of the ROP. The proposal also generally supports the creation of 15-minute neighbourhoods and aligns with the principles of transit-supportive and sustainable development.

In summary, the proposed Application conforms to the Region of Waterloo Official Plan.



Figure 3 - Region of Waterloo Official Plan Map 1: Regional Structure

- Subject Lands
- Urban Growth Centre
- Regional Intensification Corridors
- Urban Area
- Township Urban Area
- Countryside Line
- Protected Countryside
- Prime Agricultural Area
- Rural Lands
- Area Municipal Boundary



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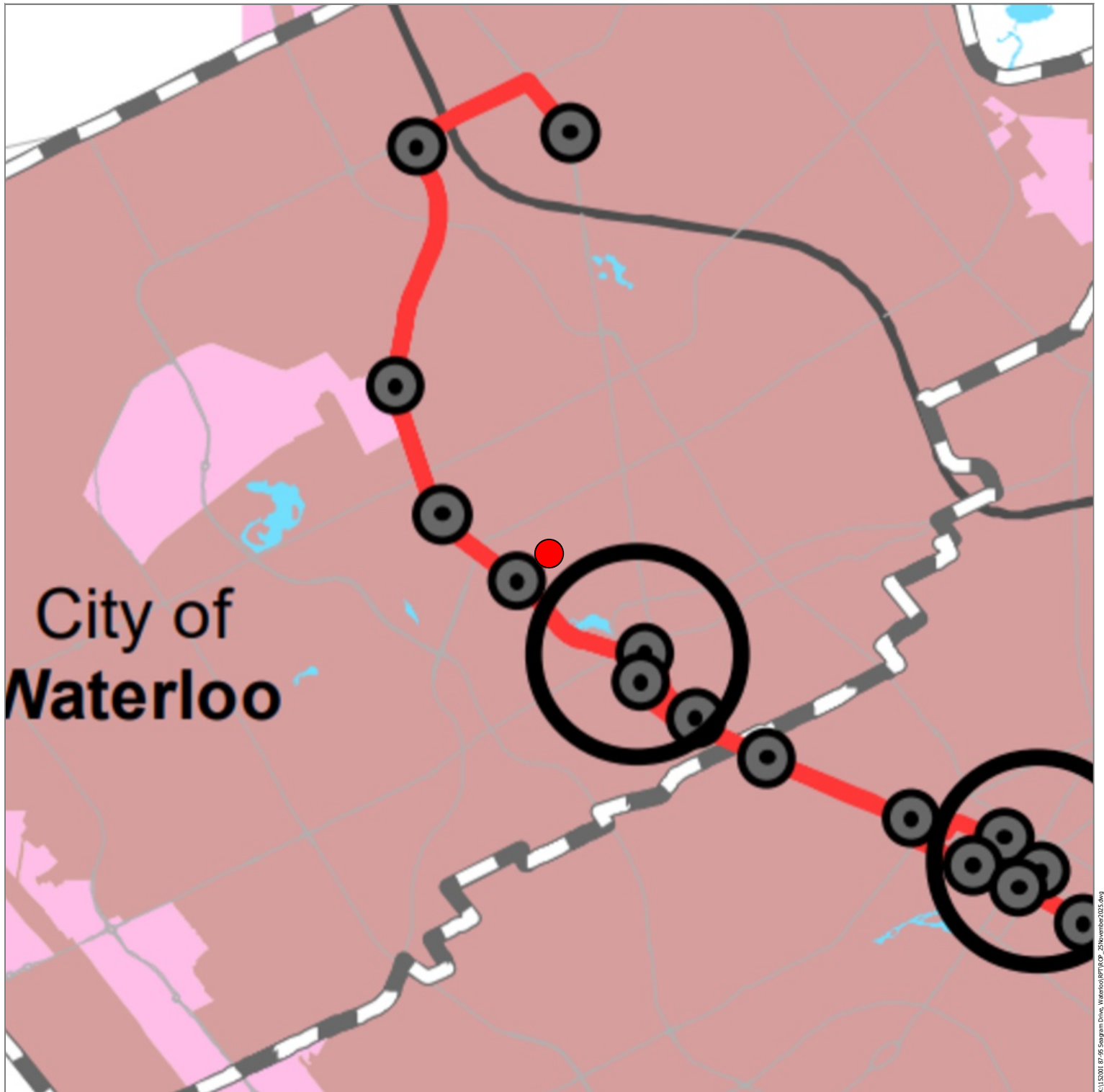


Figure 4 - Region of Waterloo Official Plan Map 2: Urban System

- Subject Lands
- Delineated Greenfield Area
- Urban Growth Centre
- Area Municipal Boundary
- Regional Intensification Corridors
- Major Transit Station Area
- Delineated Built-Up Area



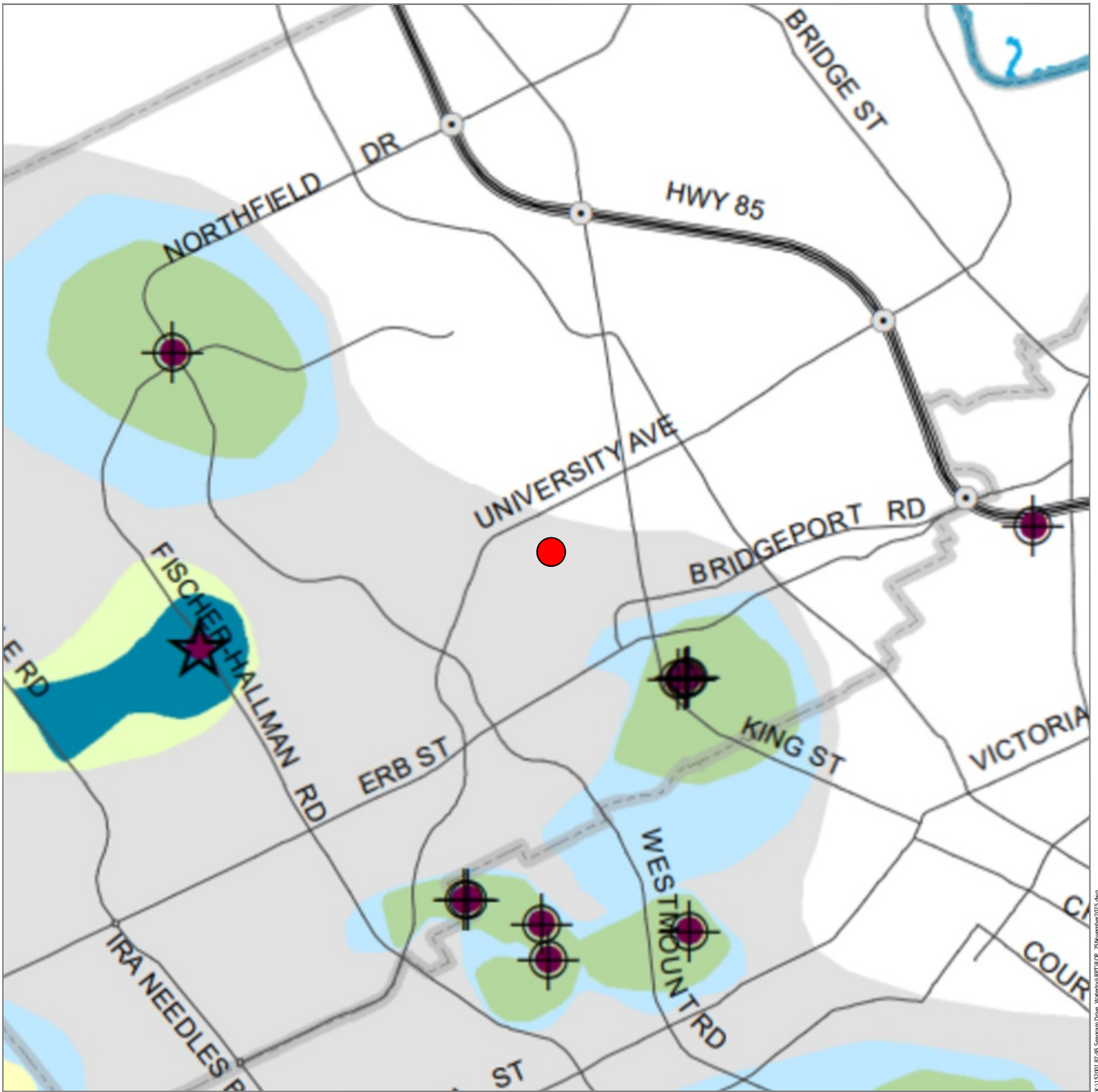




Figure 5 - Region of Waterloo Official Plan Map 6A: Urban Area Source Water Protection Areas

- | | | | | | |
|--|--|---|--|---|---------------------|
|  | Subject Lands |  | Wellhead Protection Sensitivity Area-5 |  | Municipal Wellheads |
|  | Wellhead Protection Sensitivity Area-1 |  | Wellhead Protection Sensitivity Area-6 |  | |
|  | Wellhead Protection Sensitivity Area-2 |  | Wellhead Protection Sensitivity Area-7 | | |
|  | Wellhead Protection Sensitivity Area-3 |  | Wellhead Protection Sensitivity Area-8 | | |
|  | Wellhead Protection Sensitivity Area-4 |  | Municipal Wellheads | | |

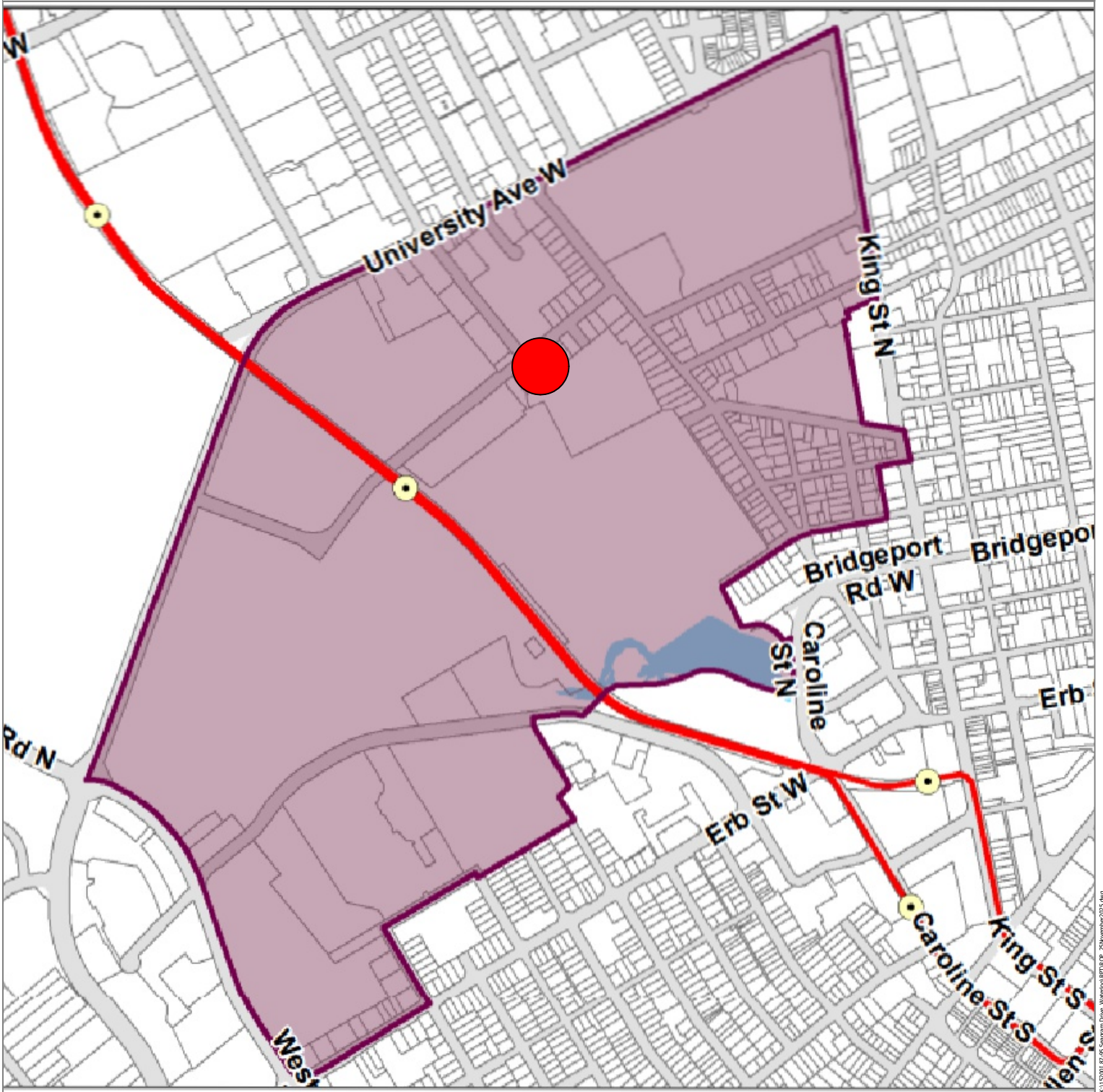


Figure 6 - Region of Waterloo Official Plan Figure 5a - Major Transit Station Areas (Laurier - Waterloo Park Station)

- Subject Lands
- Transit Stop
- Stage 1 ION LRT Route
- ... Planned Stage 2 ION LRT Route
- Major Transit Station Area
- Regional Municipal Boundary
- Area Municipal Boundary



5.3 City of Waterloo Official Plan

The City of Waterloo Official Plan was adopted in 2012 and represents the City's vision for growth and change to 2031. Official Plan Amendment 50 (OPA 50), approved by the Region in 2024, implements inclusionary zoning policies and regulations within the City's MTSAs (deferred by By-law 2025-011 on March 24, 2025 to an undetermined date). The City has adopted Official Plan Amendment 58 (OPA 58) as the first phase of the City's ongoing Official Plan Review which primarily involved updates to the City Form and Land Use policy chapters. OPA 58 received final approval from the Ministry of Municipal Affairs and Housing on December 16, 2025.

The following outlines the applicable Schedules as contained in the Official Plan and as amended by OPA 58:

- Schedule A OPA 58 (Land Use Plan): High Rise Residential (**Figure 7**);
- Schedule A6a OPA 58 (Area Specific Policies 20 and 45): 20I (**Figure 8**);
- Schedule B OPA 58 (City Structure): Major Corridor and Major Transit Station Area (**Figure 9**); and
- Schedule B1 OPA 58 (Built Form): High Rise, 30 Storeys (**Figure 10**).
- Schedule B4 (Source Water Protection Areas): Wellhead Protection Sensitivity Area 8 (WPSA-8);
- Schedule C (District Boundaries): Central;
- Schedule E OPA 58 (Road Classification System): Seagram Drive as a Minor Collector;
- Schedule F (Active Transportation Framework): Seagram Drive as a City-Wide Cycling and Multi-Use Route (**Figure 11**);
- Schedule G (Road Allowances): Seagram Drive planned for 26.0 metre ultimate road allowance;
- Schedule J5 (Wilfred Laurier University and Waterloo Park Station Area): Within Station Area Boundary, Area B (**Figure 12**).

5.3.1 Urban Area

The subject lands are located within the Urban Area. Section 2.3(1) of OPA 58 highlights that one of the main objectives of the Official Plan is to accommodate growth in a manner that promotes the efficient use of land. A significant proportion of the City's population and employment growth is expected to be accommodated through intensification within the existing Urban Area. Table 3-1 (Section 3.2.1) of OPA 58 provides that 83% of residential development is to occur within the Urban Area annually. The majority of this intensification is to be provided in the Uptown Waterloo Urban Growth Centre, Nodes, Corridors, and MTSAs, as discussed herein.

5.3.2 Major Corridors & MTSAs

The subject lands are located within a Major Corridor pursuant to Schedule B (City Structure) of OPA 58 (see **Figure 9**) and within the Wilfred Laurier University and Waterloo Park Station Area ("Area B") as per Schedule J5 of the Official Plan (see **Figure 12**).

Section 3.3 of OPA 58 provides that development within the City will predominantly consist of intensification within strategic growth areas which is composed of Nodes, Corridors and MTSAs. Section

3.5.4 of OPA 58 provides that compatible intensification is encouraged through the application of the following policies:

“(1) Mixed-use development will be strongly encouraged within designated Nodes, Corridors, and Major Transit Station Areas where appropriate, provided the land use designation and zoning support such mixed-use development...

(2) High Rise, Medium-High Rise and Medium Rise land uses will primarily be located in designated Nodes, Corridors and Major Transit Station Areas, and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses...

(4) Intensification of existing low rise housing to higher density multiple residential buildings will be encouraged in designated Nodes, Corridors and Major Transit Station Areas by the application of minimum densities on residential lands, where applicable.”

Section 3.5.2 of OPA 58 provides that Corridors are major streets or transit routes that link Nodes and/or MTSAs and provide opportunities for intensification through the application of high, medium high and medium rise land use designations. Corridors are generally located on planned or existing higher frequency transit routes and are therefore designed to be transit-supportive by having significant population and employment densities.

Section 3.5.3 of OPA 58 provides that MTSAs are lands located in close proximity (generally within a 500 to 800 metre radius, representing a 10 minute walk) to ION LRT stops and that these areas are a “major” focus for future growth and intensification. The provision of high densities and a mix of uses within MTSAs serves to support transit ridership and contribute to the development of complete communities. Moreover, lands shown as Area ‘B’ are to be planned as transit-supportive nodes of lesser intensity than those shown as Area ‘A’ (closest to stations) and are to plan for a built form that provides for a high level of pedestrian-oriented activity. Policy 3.5.3(2) provides that MTSAs will be planned to achieve a minimum gross density target as outlined in Table 3-1 of the Plan. Table 3-1 (Section 3.2.1) of OPA 58 provides that the Laurier-Waterloo Park MTSA shall have a population and growth target of 95 residents and jobs per hectare.

The proposed development responds to the policy direction for Major Corridors and MTSAs by consolidating lots currently used for low-density residential purposes to provide a development that includes a mix of uses, a high-rise transit-supportive form, and includes measures that provide for a high level of pedestrian-oriented activity (commercial uses along the frontage, screened parking, etc.). The proposed development also provides sidewalk connections and secure bicycle parking to support multi-modal transportation to the nearby Laurier-Waterloo Park Transit Station and will contribute to the achievement of the minimum density target for the MTSA.

5.3.3 Complete Communities

Section 3.7 of OPA 58 provides that complete communities are those that include a broad range of housing, a mix of jobs, a broad range of commercial establishments and services, community infrastructure, parks and recreation sites, cultural and social facilities that are well connected by a system of networks. The Section further provides that complete communities will be planned at the Planning District and neighbourhood level with the intent of achieving neighbourhoods that are compact and where people can meet their daily needs within a short trip by walking, cycling and rolling.

The proposed development supports the achievement of complete communities by providing a range of unit types (one to four bedrooms) to meet the needs of a variety of residents, a high density to support transit ridership, a mix of uses (including commercial units and office space) to help meet the needs of nearby residents and infrastructure to support active transportation. The subject lands are located within the Central District which includes supportive uses and services nearby (commercial areas, institutional uses, parks, transit, etc.).

5.3.4 Built Form

As per Section 3.4 of OPA 58, Schedule B1 (Built Form) outlines the maximum permitted heights and Policy (2) within this Section provides that a maximum height of up to 30 storeys may be permitted within an MTSA. Schedule B1 of OPA 58 delineates the property as “High Rise, 30 Storeys”.

Policy 3.4(3) of OPA 58 provides that no maximum densities are set out in the Plan and that the Zoning By-law may establish minimum and/or maximum densities. Policy (4) of this Section further provides that density will be measured using a gross calculation after all road widenings and other conveyances.

Pursuant to the above, an amendment is required to the Official Plan to permit the proposed height on the subject lands. **Section 5.3.8** of this Report provides an evaluation of the criteria established in Policy 3.4(6) to (8) of OPA 58 pertaining to requests for increased heights.

5.3.5 Transportation

Chapter 6 of the Official Plan provides policies pertaining to transportation, with the overarching objectives including support for opportunities for active transportation and transit use, support for a multi-modal system, and increased connectivity. As per Schedule F (Active Transportation Framework) of the Official Plan, Seagram Drive is a City-Wide Cycling and Multi-Use Route that is connected to active transportation networks to the east and west (see **Figure 11**). As discussed throughout this Report, the subject lands are also in proximity to various transit services that, together with the connection to active transportation routes, supports the objectives of Section 6 of the Official Plan.

5.3.6 Special Policy Area

The subject lands are within Area 20I as per Schedule A6a (Specific Provision Areas 20 and 45) of the Official Plan and OPA 58 (see **Figure 8**). The following policies within Section 11.1.20 (Specific Provision Area 20 – Lands around Wilfred Laurier University) are applicable to the subject lands:

“(11) Notwithstanding anything contained in this Official Plan, lands within Area “20I” as shown on Schedule A6(a) shall be dually designated High Rise Residential and Major Institutional-Academic, provided further that:

- (a) University residential uses are permitted and shall have a minimum density of 150 bedrooms per hectare; and,
- (b) Non-residential academic uses are permitted as ancillary uses on a property that contains high rise residential or university residence as the primary use.”

Generally, the proposed development conforms with the above policy objectives as the proposal includes high-density housing that would be suitable for students; however, institutional type uses and/or university residential uses are not being expressly pursued. As the lands are not part of the Wilfrid Laurier University Campus, the requested OPA will remove the lands from Specific Provision Area 20I and establish a new Specific Provision Area that permits the increased height.

5.3.7 High Rise Residential and Major Institutional-Academic Designation

The subject lands are designated High Rise Residential pursuant to Schedule A (Land Use Plan) of OPA 58 (see **Figure 7**) and are dual designated to also be within the Major Institutional-Academic designation pursuant to Schedule A6(a) and Section 11.1.20 of the Official Plan (see **Figure 8**).

The Vision and Planned Function for the High Rise Residential designation (Section 10.1.6 of OPA 58) provides that the designation is a category in which multiple residential buildings are the predominant use of land and that it is intended to provide opportunities for substantial levels of intensification. The designation intends to encourage high density, mixed-use, primarily residential development in Major Nodes and Corridors.

Policy 10.1.6(3) of OPA 58 provides that the height and density of uses within the High Rise Residential designation shall be limited as shown on Schedule B1 (Built Form) and as set out in Section 3.4 (discussed in **Section 5.3.4** of this Report). This Policy furthermore applies the following regulations:

- “(a) The minimum gross residential density on any one site shall be 150 bedrooms per hectare (or an equivalent as set out in the Zoning By-law), and the maximum gross residential density permitted on any one site may be established in the implementing Zoning By-law.
- (b) The maximum height of any building shall not exceed 30 storeys in the Uptown Waterloo Primary Node and Major Transit Station Area, and 25 storeys in all other Nodes and Corridors designated High Rise Residential.”

Policy 10.1.6(5) provides that High Rise Residential lands may be zoned to permit offices, medical clinics, convenience retail, restaurants, food stores, child care centres, personal services, and spiritual uses as ancillary uses, subject to the implementing Zoning By-law setting out performance standards.¹ Similarly, Policy 10.1.2(38) of OPA 58 provides that residentially-designated lands may permit a limited range of commercial uses that cater to pedestrian, bicycle and non-vehicular travel (oriented towards the pedestrian environment) and are intended to support the primary residential uses.

The Major Institutional-Academic designation permits academic facilities for post-secondary educational institutions, student residences, and other similar uses.

¹ Policy 10.1.6(5) states that it applies to lands designated “Mixed-Use High Density Residential”; however, this designation does not exist under OPA 58 and this policy is within the section of policies pertaining to the High Rise Residential designation. Given the foregoing, it is understood that Policy 10.1.6(5) applies to the High Rise Residential designation.

The proposed uses are permitted (including commercial uses along the frontage and office uses in the upper storeys as ancillary uses), however an OPA is required to permit the proposed height (34 storeys plus a 9-metre elevator penthouse) as discussed in relation to Schedule B1.

5.3.8 Official Plan Amendment Request

To permit the proposed development in the context of the Official Plan, the following Official Plan Amendment (OPA) is required:

1. That Schedule 'A6a' of the Official Plan of the City of Waterloo is hereby amended by removing 87, 89, 91, 93 and 95 Seagram Drive from "Specific Provision Area 20I" and designating 87, 89, 91, 93 and 95 Seagram Drive as "Special Provision Area XX", as shown on **Figure 13** attached hereto.
2. That Section 11.1 of the Official Plan, Special Provision Areas, be amended by adding the following Specific Provision Area:

11.1.XX Special Provision Area XX (87, 89, 91, 93 and 95 Seagram Drive)

- (1) The policies of this Special Provision Area XX (SPA XX) apply to the land known municipally as 87, 89, 91, 93 and 95 Seagram Drive.*
- (2) It shall be a policy of this Plan that, notwithstanding anything to the contrary, the maximum building height on the lands comprising SPA XX shall be 34 storeys and 111 metres (plus a 9-metre elevator penthouse).*
- (3) It shall be a policy of this Plan that, notwithstanding anything to the contrary, a minimum of X percent (X%) of the density on the lands comprising SPA XX shall be affordable housing in accordance with the Canada Mortgage and Housing Corporation (CMHC) definition of affordable housing, for a period of not less than 25 years, to be secured through an agreement with the landowner that addresses the requirement of the affordable housing, to the satisfaction of the City of Waterloo and/or the Region of Waterloo.²*

The following paragraphs provide a review of the justification for the requested increase in height pursuant to the proposed OPA.

The OPA serves to request a maximum height of 34 storeys (plus an elevator penthouse) whereas 30 storeys is currently permitted. The Pre-Consultation Record directs the Application to be evaluated based on the criteria set-out in Section 10.1.1(12) of the Official Plan and further provides that this criteria has been maintained and expanded in OPA 58. In light of this commentary, **Table 4** (below) provides a summary of how the proposed development has regard for the criteria of Policy 3.4 (6) of OPA 58 which provides the criteria for considering requests for increased heights.

² % to be confirmed as a part of the Application review.

Table 4: Review of Policy 3.4(6), as included in OPA 58

Official Plan Criteria/Consideration	Response
(a) Lands are located within a designated Node, Corridor or Major Transit Station Area and satisfy all relevant policies of the City Form Chapter;	The subject lands are within a designated Corridor and are within an MTSA. The proposed development satisfies the relevant policies of the City Form Chapter.
(b) The proposed built form is deemed appropriate for the site and neighbourhood, has minimal impact on neighbouring land uses, and achieves an appropriate built form transition and buffer from lands designated Low Rise Residential;	The subject lands do not immediately abut any designated Low Rise Residential lands and are located within a strategic growth area. The proposed height is appropriate given the site's location and surrounding uses. There will be minimal impact on neighbouring land uses as demonstrated through various studies completed in support of the Application.
(c) There is a demonstrated benefit to the surrounding community associated with granting the increase in building height beyond that of accommodating additional population in the context of Waterloo's population forecast and the supply / capacity of lands within existing designated Nodes, and Corridors, and Major Transit Station Areas; i. positive benefits noted in 3.4(6)(c) may include but are not limited to a broader mix of multi-bedroom units, enhanced active transportation connections, conservation of cultural heritage, enhanced sustainable design, increased parkland, and sustainable building features;	There will be a benefit to the surrounding community associated with the proposed development, including the provision of sustainable development principles, a high-quality urban design, the provision of a range of unit sizes and the provision affordable units.
(d) There are limited adverse impacts to the surrounding area(s) in relation to sun, shadow, wind, significant views, transportation, compatibility, and emissions (including noise);	Technical reports and plans prepared in support of the Application (including shadow, wind, transportation and noise studies) demonstrate that there are limited adverse impacts to the surrounding areas.
(e) The site is well served by existing or planned transit;	As previously noted, the subject lands are within an MTSA and are therefore well served by transit including LRT and existing bus service.
(f) The proposal does not require significant relief from standard regulations including landscaping, amenity space and other site-specific requirements;	The proposal does not require significant relief from standard regulations and exceeds the minimum amenity space requirement. It is noted that some of the amendments (i.e. location of ancillary uses) are only required because the Zoning By-law has not yet been updated to reflect the policies of OPA 58.
(g) Surface parking is minimized in favour of more intensive forms of parking, including underground parking where feasible;	The proposed parking is primarily located within the one level of underground parking. The remaining parking that is provided at-grade is

	generally within and to the rear of the structure, recognizing that the building is cantilevered over the at-grade parking to the rear.
(h) Cultural heritage resources are conserved;	The subject lands do not contain and are not immediately adjacent to cultural heritage resources. As provided in the Record of Consultation, the actual heritage features on the adjacent property of 157 Albert Street and within Waterloo Park are located far enough away from the site that there are no anticipated impacts to these resources.
(i) The proposal demonstrates a high standard of urban design in accordance with the City's Urban Design standards and guidelines and any other relevant urban design policies set out in this Plan;	The proposal includes a high standard of urban design. The Urban Design Brief prepared in support of the Application provides a detailed summary of how the proposed development has appropriately responded to urban design policies and guidelines.
(j) The proposal identifies and implements any required transportation improvements, with a particular focus on transportation demand management measures;	The subject lands are located within an MTSA and therefore there are no minimum parking requirements. Notwithstanding, the Owner is proposing a shared parking model and unbundled parking. No transportation improvements are required to support the proposed development.
(k) Medium to high rise residential uses are located with direct vehicular access to arterial or collector roads to the extent possible. Where such access is deemed by the City to be undesirable or not feasible, vehicular access may be provided by local streets if traffic is directed to the nearest arterial or collector road via a route that minimizes vehicular travel within the low rise residential neighbourhood;	The subject lands have frontage on Seagram Drive which is classified as a Minor Collector road. No access is proposed to local streets.
(l) Infrastructure capacity is not exceeded;	A Functional Servicing Report has been prepared and confirms that infrastructure capacity is sufficient for the proposed development.
(m) Community services, infrastructure and transportation impact issues are adequately addressed, as applicable. A Transportation Impact Study, Servicing Report, and any other relevant supporting information may also be required. All relevant supporting information may require, at the City's request, examination of off-site impacts;	Required technical studies including a Transportation Impact Study and Servicing Report have been prepared in support of the Application and conclude that there are no adverse off-site impacts.
(n) If applicable, safe access, flood protection and geotechnical stability is achieved to the satisfaction of the City and the Grand River	N/A.

Conservation Authority, and any other authority having jurisdiction;	
(o) Emergency response is determined feasible, and emergency access is provided, to the satisfaction of the City; and,	Emergency services access is typically reviewed through the detailed site plan review process. Notwithstanding, as the building has direct access from the abutting public street, emergency response is not anticipated to be an issue.
(p) The proposal satisfies all other applicable policies, including the policies of this Official Plan.	In our opinion, the proposal satisfies all other applicable policies of the Official Plan.

In addition to Policy 3.4(6) considered above, Policy 3.4(8) of OPA 58 provides that applications to exceed the maximum height limit of the High-Rise designation must demonstrate how the impact of the increased height will be minimized on adjacent low or medium rise areas and sets out various potential mitigation measures, including the incorporation of step-backs and reduced floorplates.

The subject lands are not adjacent to any designated low or medium-rise areas; however, it is acknowledged that some of the building forms in the vicinity have a low to medium rise form. To address Policy 3.4(8), the following is recognized:

1. The adjacent lands to the east and to the north (across Seagram Drive) have a mid-rise form that is generally compatible with the podium of the development;
2. The low-rise building on the northwest corner of the intersection of Lester Street and Seagram Drive is separated from the subject lands by a buffer (being the right-of-way) as per the direction of Sub-Section (e) of the Policy and the podium element provides a transition thereto;
3. The proposal provides reduced tower floorplates (617 square metres, whereas 1000 square metres is permitted) to provide a more slender built form;
4. The proposal compliments the planned function of the surrounding neighbourhood (recognizing the area is planned to accommodate intensification as an MTSA); and
5. Appropriate studies have been prepared to evaluate the proposal and provide mitigation measures to reduce potential impacts to adjacent properties, as applicable.

Policy 3.4(9) of OPA 58 furthermore provides that as the height and/or scale of a development increases, that the applicant shall demonstrate how the urban design, mitigation of impacts, and benefits to the surrounding community correspondingly increase. In addition to the urban design considerations set forth in this Report and the Urban Design Brief and the mitigation measures that have been incorporated into the proposal and/or set-out in the technical studies, the proposal provides various benefits to the surrounding community, including the provision of a range of unit types to meet a variety of needs and the provision of missing middle and affordable housing units.

Policy 3.4(12) of OPA 58 provides that any tall building exceeding 410 metres above sea level shall demonstrate that the proposed development will not negatively impact the Region of Waterloo International Airport. To address this Policy, a letter from Nav Canada is included with the submission.

In our opinion, the requested OPA to permit an increase in the building height is appropriate for the subject lands.



Figure 7 - City of Waterloo Official Plan Amendment 58 Schedule A: Land Use Plan











- | | |
|---|--|
|  Subject Lands |  Medium High Rise Residential |
|  Uptown Waterloo Primary Node |  High Rise Residential |
|  Deferred |  Commercial and Mixed-Use |
|  Low Rise Residential |  Major Institutional - Academic |
|  Medium Rise Residential |  Open Space |





Figure 8 - City of Waterloo Official Plan Amendment 58 Schedule A6a: Area Specific Policies 20 and 45

 Subject Lands



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Figure 9 - City of Waterloo Official Plan Amendment 58 Schedule B: City Structure


















- | | |
|---|---|
|  Subject Lands |  Minor Corridor |
|  Uptown Waterloo Primary Node |  Primary Node |
|  Deferred |  ION Rapid Transit Station |
|  Major Node |  ION LRT |
|  Major Corridor |  Major Transit Station Area Boundary |





Figure 10 - City of Waterloo Official Plan Amendment 58 Schedule B1: Built Form





- | | | | |
|--|------------------------------|---|------------------------------|
|  | Subject Lands |  | Medium High Rise, 12 storeys |
|  | Uptown Waterloo Primary Node |  | High Rise, 30 storeys |
|  | Deferred | | |
|  | Low Rise, 4 storeys | | |
|  | Medium Rise, 6 storeys | | |



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Figure 11 - City of Waterloo Official Plan Schedule F: Active Transportation Framework

-  Subject Lands
-  City-Wide Cycling and Multi-Use Routes
-  Potential Pedestrian Corridor (Conceptual)
-  Active Transportation Connections (Conceptual)



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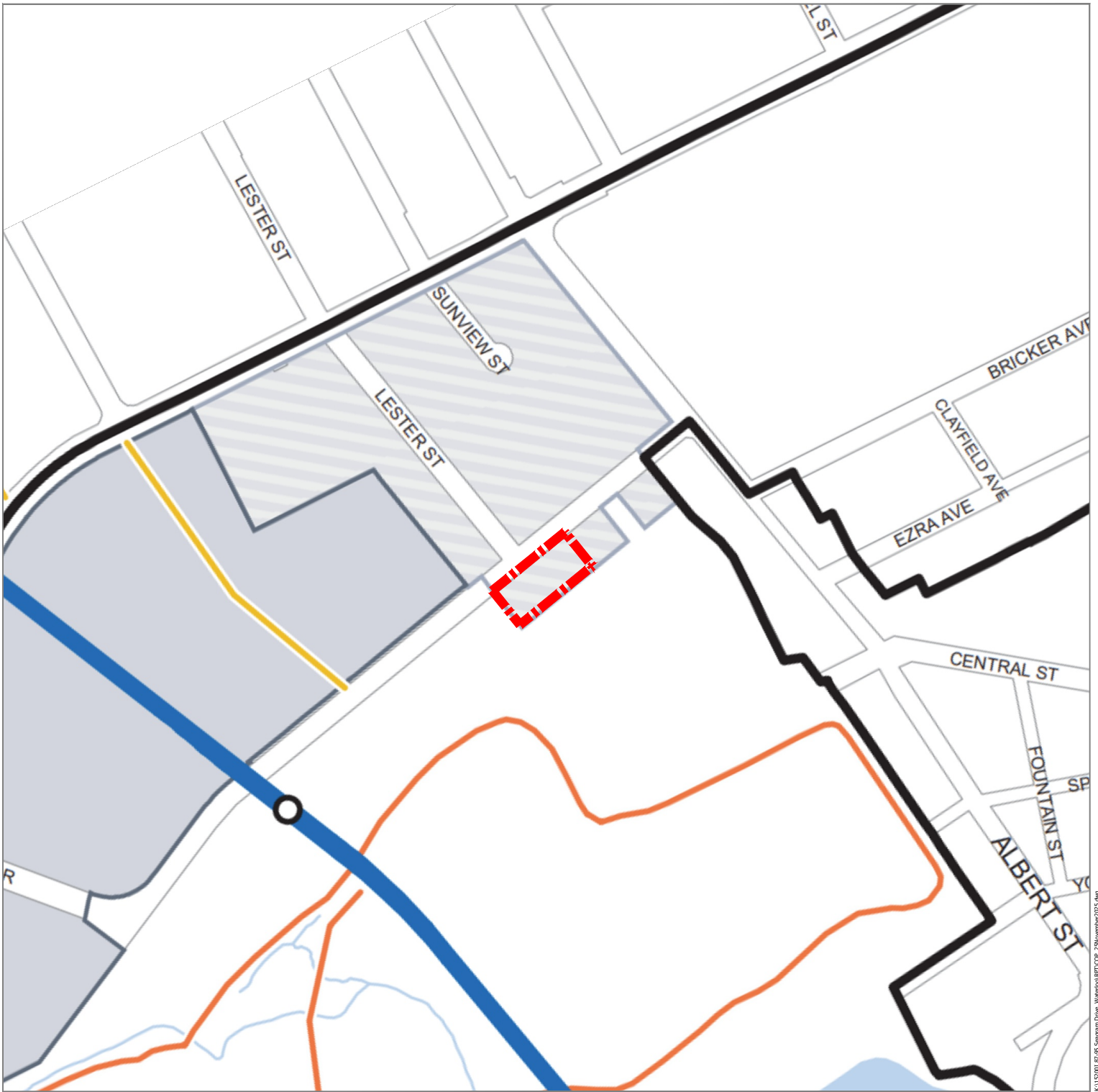










Figure 12 - City of Waterloo Official Plan Schedule J5: Wilfrid Laurier University and Waterloo Park Station Area

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



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Figure 13 - Proposed Official Plan Amendment Schedule A6a: Area Specific Policies 20 and 45 (OPA 58)



Subject Lands



Lands to be amended by adding a Specific Provision Area.



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5.4 Station Area Plan

The City of Waterloo approved a Station Area Plan for Laurier-Waterloo Park in June 2017. The Plan identifies the transformation of Seagram Drive into “an important gateway into Waterloo Park and Laurier” as one of six “Big Moves” and includes the land in the residential mixed-use area. This area permits medium-high to high density residential development with at-grade uses to improve amenity for local residents. Another objective of the Plan is to provide a range of housing, including options for families and seniors, within a variety of unit types and sizes. The proposed development will contribute to the provision of a range and mix of housing types available in the City, the establishment of a gateway in its vicinity through the provision of a prominent development form, and will improve the local amenity through its interface with active uses (commercial) along the street-front.

5.5 City of Waterloo Zoning By-law 2018-050

5.5.1 Current Zoning

The lands addressed as 89, 93 and 95 Seagram Drive are currently zoned University College 81 (UC-81) and the lands addressed as 87 and 91 Seagram Drive are currently zoned Residential Mixed-Use 81 (RMU-81) in the City of Waterloo Zoning By-law 2018-050, as shown on **Figure 14**.

Pursuant to Section 7.10.1.1 of the Zoning By-law, the RMU-81 Zone permits mixed-use buildings with dwelling units above the first storey with a maximum height of 81 metres or 25 storeys. Section 7.10.1.5 permits ancillary uses to a mixed-use building with dwelling units above the first storey, including:

- Café;
- Child care centre;
- Commercial recreation;
- Commercial wellness;
- Drug store;
- Food store;
- Medical clinic;
- Office;
- Personal service shop;
- Restaurant and take-out restaurant;
- Spiritual use; and
- Variety store.

The UC-81 Zone primarily permits academic uses, including student residences and ancillary commercial uses.

The RMU-81 zone generally permits the proposed development (requires amendments for the building height, setbacks, tower dimensions, etc. per the below). Through discussions with City staff, a revised RMU-81 zone is proposed for the subject lands to implement the proposed development.

5.5.2 Proposed Zoning

To permit the proposed mixed-use development, the subject lands will require a ZBA. The proposed ZBA is to rezone the subject lands to Residential Mixed-Use 81 with Special Provisions (RMU-81(**)), as shown on **Figure 15**.

The following table provides an analysis of the proposed development against the RMU-81 Zone:

Proposed Zoning: Residential Mixed Use 81 with Special Provisions (RMU-81(_))			
Provision	Regulation	Proposed	Compliant
Lot Frontage (minimum)	20 m	85.55 m	Yes
Street line setback (minimum)	5 m	5.0 m ^{*3}	Yes
Street line setback (maximum)	At least 75% of the street line front building façade shall be within 6 m of the street line	≤6.0 m for >75%	Yes
Side yard setback (minimum)	3 m	3.0 m ^{*4}	Yes
Rear yard setback (minimum)	5.0 m	5.0 m ^{*5}	Yes
Low rise residential lot line setback (minimum)	7.5 metres or half the height of the building, whichever is greater	N/A	N/A
Building height (minimum)	13.5 m	111 m (34 storeys)	Yes
Building height (maximum)	81 m and 25 storeys	111 m (34 storeys)	No*
Building height exclusions	Elevator penthouse disregarded when calculating building height, provided elevator penthouse does not exceed 6 metres in height	9 metres	No*
Density (minimum)	150 bedrooms per hectare	3123 (before road widening); 3367 (after road widening dedication)	Yes
Density (maximum)	750 bedrooms per hectare	3123 (before road widening); 3367 (after road widening)	No*
Landscaped open space (minimum)	30%	20 %	No*

³ Balconies project 1.5 metres into front yard. Retaining walls in front yard are less than 0.6 metres above grade.

⁴ Area wells project 1 metre into side yard (to be considered retaining walls, less than 0.6 metres above grade).

⁵ Balconies project 1.5 metres into rear yard.

Proposed Zoning: Residential Mixed Use 81 with Special Provisions (RMU-81(_))			
Provision	Regulation	Proposed	Compliant
Number of main buildings per lot (maximum)	More than one permitted	Two towers on a shared podium	Yes
Height of first storey (minimum)	4.0 m	~40% <4.0 m	No*
Podium height (minimum)	10.5 m	23 m (27 m including breezeway)	Yes
Podium height (maximum)	21 m and 6 storeys	23 m and 7 storeys (plus breezeway; 27 m total podium height)	No*
Tower separation measured from exterior face of the building, including balconies (minimum)	a) 22 m from a tower on the same lot b) 11 m from an interior lot line, except where the interior lot line abuts lands zoned OS1 (see 3.T.5.2) c) One tower separation setback to a side lot line may be reduced to a minimum 6 metres provided that the tower separation setbacks to both side lot lines combined equals a minimum 22 metres (3.T.5.2).	a) 21 m b) West: 3 m (abuts OS Zone); East: 9 m; South: 5.0 m (partially abuts OS Zone).	No*
Tower stepback above podium, including balconies, on the front building façade and flankage building façade (minimum)	3 m (see 3.T.5.1)	50.9 % at 3 m; 49.1 % at 1 m.	No*
Tower stepback above the podium on an OS1 building façade (3.T.5.1)	Minimum three metre (3m) tower stepback above the podium, including balconies, on an OS1 building façade.	South: 50.9 % at 2.6 m; 49.1 % at 0 m. West: 17.8 % at 6.67 m; 82.2 % at 0 m.	No*
Horizontal tower dimension (maximum, excluding balconies per Section 3.T.5.3)	40 m	26.1 m	Yes
Tower footprint (maximum)	1000 m ²	617 m ²	Yes
Amenity area	2670 m ² (3 m ² for the first bedroom and 2 m ² for each	2704 m ²	Yes

Proposed Zoning: Residential Mixed Use 81 with Special Provisions (RMU-81(_))			
Provision	Regulation	Proposed	Compliant
	additional bedroom in the dwelling unit)		
Common amenity area (3.A.4.2)	Multi-unit buildings containing 50 bedrooms or more shall provide a minimum of 30% of the required amenity area as common amenity area.	>30% as common amenity	Yes
Amenity area location (3.A.4.4)	A maximum of 20% of the required amenity area may be outdoor rooftop amenity space located more than 22 m above grade	~39% of amenity is located on outdoor rooftop of podium	No*
Location of building entrance (7.10.5)	Every building shall have a front entrance at grade on the front building façade and/or flankage building façade	Entrance located on front façade	Yes
Location of ancillary uses (7.10.6 a.))	Ancillary uses specified in Section 7.10.1.5 shall abut the front building façade and/or flankage building facade	Commercial uses abutting the front building façade and office uses in the upper levels	No*
Location of ancillary uses (7.10.6 b.))	Ancillary uses specified in Section 7.10.1.5 shall only be permitted on the first storey of a mixed-use building with dwelling units above the first storey	Commercial uses on the first storey and office uses in the upper levels	No*
Floor area of ancillary uses (7.10.6 d.))	Ancillary uses specified in Section 7.10.1.5 shall not collectively exceed 15% of the building floor area of 5,000 square metres, whichever is more restrictive	<15% of floor area and 1326 m ²	Yes
Floor area of commercial units (7.10.6. e.))	For the ancillary uses specified in Section 7.10.1.5, the maximum floor area of each commercial unit shall be 465 square metres	77 – 132 m ² per unit	Yes
Floor area of specific uses (7.10.6 f.) and g.))	Notwithstanding e.), the maximum floor area of a food store or drug store	<1,115 m ² if proposed	Yes

Proposed Zoning: Residential Mixed Use 81 with Special Provisions (RMU-81(_))			
Provision	Regulation	Proposed	Compliant
	shall be 1,115 square metres and a maximum of 1 food store and 1 drug store is permitted on a lot		
Permission for structured parking within the first storey (7.10.10 a.))	Minimum 25% of the first storey shall be comprised of common indoor amenity area, commercial uses specified in 7.10.1.5, entrance/foyers, management offices, lobby, hydro transformer room, etc.	>25% of the main floor is used for active uses	Yes
Structured parking location (7.10.10 b.))	Shall be located entirely behind the building floor area described above	To the rear and side of specified uses	Yes
Active building floor area (7.10.10 c.))	For an interior lot, the building floor area devoted to uses specified in section "a.)" shall abut the entire front building facade	Uses abut front building facade	Yes
Building entrance (7.10.10 e.))	Where the first storey is partially comprised of structured parking, the principle building entrance shall be located on the street line building façade containing the active building floor area	Located on the street line building façade containing the active building floor area	Yes
Driveway location (7.10.11)	A driveway may compromise part of the front building façade	Both comprise part of the front building facade	Yes
Street Specific Building Line Setback (Schedule B)	Building line setback of 13.0 m from the historic centreline of the street	Achieved with right-of-way dedication	Yes
Vehicular Parking (min.)	N/A (within MTSA)	76	Yes
Visitor Parking (min.)	N/A (within MTSA)	7	Yes
Barrier-Free Parking (min.) (6.4.1)	N/A (within MTSA)	4	Yes
Location of underground parking (6.2.1)	Underground parking shall comply with the front yard building line setback in the	3.0 m	No*

Proposed Zoning: Residential Mixed Use 81 with Special Provisions (RMU-81(_))			
Provision	Regulation	Proposed	Compliant
	zoning category applied to the lot		
Screening of structured parking (6.2.6)	Structured parking shall be screened from exterior view from the street	Screened by building mass	Yes
Electric vehicle parking in structured spaces (6.3.1.1)	All structured spaces are to be EV ready	All spaces EV ready	Yes
Bicycle Parking (6.6.2)	332 (156 Type A (0.3/dwelling unit), 156 Type B (0.3/ dwelling unit), 20 Type A or B for commercial (40% of required car parking))	540 Type A, 20 Type B (560 total) (Type A may satisfy Type B requirements)	Yes
Vertical Bicycle Parking Dimensions (min.)	Width: 0.6 m Length: 1.25 m Vertical clearance: 2 m Aisle width: 1.75 m	Width: 0.27 m Length: 1.27 m Vertical clearance: 2.4 m Aisle width: 0.915 m	No*
Loading Space Requirements (min.) (6.9.4.1)	N/A (within MTSA)	2	Yes

*denotes special provision required.

The proposed ZBA is as follows:

That Zoning By-law 2018-050 is hereby amended by adding "CXXX" to Schedule 'C' of said By-law 2018-050 for the lands known municipally as "87-95 Seagram Drive" as shown on **Figure 15** attached hereto, as set out below:

Exception CXXX	Address 87-95 Seagram Drive	Zoning RMU-81(_)	File Reference OPA XX ZBA-25-XX
-------------------	--------------------------------	---------------------	---------------------------------------

Location: 87-95 Seagram Drive as shown on Schedule 'C1' to this BY-LAW.

Site Specific Regulations:

Notwithstanding anything to the contrary, the following site-specific regulations shall apply to the lands municipally known as 87-95 Seagram Drive:

- BUILDING HEIGHT (maximum): 111 metres and 34 storeys, inclusive of PODIUM.
- BUILDING HEIGHT exclusion: 9 metre elevator penthouse.

- c. DENSITY (maximum): 3574 BEDROOMS per hectare, provided further that the maximum number of DWELLING UNITS on the Lands shall be 550.⁶
- d. LANDSCAPE OPEN SPACE (minimum): 20%.
- e. Height of FIRST STOREY (minimum):
 - i. For up to 50% of the FIRST STOREY, the minimum shall be 3.0 metres, provided further that a maximum of 15% of the FRONT BUILDING FAÇADE be affected.
- f. PODIUM Height (maximum): 23 metres and 7 storeys.
- g. PODIUM Height exclusion: 4.2 metre breezeway between the base of the TOWERS.
- h. TOWER Separation (minimum):
 - i. 21 metres from a TOWER on the same LOT;
 - ii. 3 metres from the westerly LOT LINE;
 - iii. 9 metres from the easterly LOT LINE;
 - iv. 5 metres from the southerly LOT LINE.
- i. TOWER STEPBACK above PODIUM on the FRONT BUILDING FACADE (minimum):
 - i. For up to 50% of the northerly TOWER STEPBACK, the minimum shall be 1 metre.
- j. TOWER STEPBACK above the PODIUM on an OS1 BUILDING FAÇADE:
 - i. For up to 50% of the TOWER STEPBACK to the south (rear), the minimum shall be 0 metres and the remaining shall be 2.5 metres.
 - ii. For up to 85% of the TOWER STEPBACK to the west, the minimum shall be 0 metres.
- k. A maximum of 40% of the required AMENITY AREA may be outdoor rooftop amenity space located more than 22 metres above GRADE.
- l. OFFICE uses shall be permitted above the GROUND STOREY of a MIXED USE BUILDING.
- m. UNDERGROUND PARKING shall be permitted to have a 3 metre FRONT YARD BUILDING LINE setback.
- n. Vertical TYPE 'A' BICYCLE PARKING spaces shall be permitted to have a width of 0.27 metres and an aisle width of 0.915 metres.
- o. AMENITY AREA to include washrooms, storage areas, circulation areas, and the like that are within areas designed for active and/or passive recreation for the exclusive use and benefit of residents/tenants.

As a part of the site-specific regulations, it is our understanding that the City may require a holding symbol (H) to be applied to the subject lands for the owner to enter into an agreement with the City and/or Region to secure residential density on the lands as affordable housing to the effect of the following:

Prior to the passing of a BY-LAW to remove the holding (H) symbol, the owner of the Lands shall enter into an agreement with the City of Waterloo and/or the Region of Waterloo, to secure at least X% of the residential density on the Lands as affordable housing in accordance with the definition of affordable housing by the Canada Mortgage and Housing Corporation (CMHC). Duration of such affordability shall be at least 25 years and further detailed in the agreement, in addition to other and further relevant terms and conditions, all to the satisfaction of the City of Waterloo and/or the Region of Waterloo.

⁶ Density has been measured in accordance with Policy 3.4(4) of OPA 58 (provides measurement after all road widenings and other land conveyances).

A holding symbol (H) may also be required to address the recommendations of the Environmental Noise Study (i.e. items for consideration at the detailed design phase) to the effect of the following:

Prior to the passing of a BY-LAW to remove the holding (H) symbol, the owner of the Lands shall provide verification of mechanical system type, sound levels, and compliance with the guideline limits in MECP Publication NPC-300 to the City of Waterloo's satisfaction. The verification and sign-off shall be completed by a qualified Noise Study Consultant acceptable to the City of Waterloo.

As a part of the Pre-Submission Consultation, it is acknowledged that the Region requested that the ZBA include a prohibition on vertical closed-loop geothermal energy systems. To this effect, Section 3.W.1.1 of the Zoning By-law prohibits geothermal wells on lands to the west of Weber Street (applies to the subject lands).

Planning Justification for Proposed ZBA:

1. Increase Maximum Permitted Building Height and Building Height Exclusion for Elevator Penthouse

The ZBA requests to permit a maximum building height of 111 metres and 34 storeys whereas Section 7.10 permits a maximum height of 81 metres and 25 storeys. The ZBA also requests to permit a building height exclusion for an elevator penthouse with a 9 metre height whereas Section 2 of the Zoning By-law disregards the same in the definition of building height to a maximum of 6 metres. Justification for the increased height has been discussed in **Section 5.3.8** of this Report and is also discussed herein.

The subject lands are located within a strategic growth area (MTSA), are located in proximity to supportive uses (commercial areas, parks, etc.), are well-served by nearby transit and active transportation infrastructure, and do not immediately abut any designated low-rise residential lands. The proposed height compliments the planned function of the area as a focus for intensification.

The proposed development has been designed with towers on top of a podium element. The adjacent lands to the east and to the north generally have a mid-rise form that is compatible with the podium element and tower stepbacks are provided above the podium to support the transition to same. The proposal provides towers with a slender built form to reduce their overall mass. The increase in the building height exclusion accounts for the elevator penthouse which forms the top of the towers.

Appropriate studies have been prepared to evaluate the proposal and provide mitigation measures to reduce potential impacts to adjacent properties, including a Shadow Study which generally concludes that the shadows cast onto the neighbouring properties are not considered significant or detrimental. An Urban Design Brief has also been prepared in support of the proposed development and provides an analysis of the compatibility of the proposed development in the context of the surrounding neighbourhood.

2. Increase Maximum Permitted Density

The ZBA requests to permit a maximum density of 3574 bedrooms per hectare (after the road widening dedication, provided further that the maximum number of dwelling units on the lands shall be 550 units) whereas Section 7.10 permits a maximum density of 750 bedrooms per hectare.

The proposed density provides for the efficient use of land and resources and aligns with the general intent of accommodating growth and intensification within MTSA's. In this regard, the proposed density

can be accommodated on the subject lands utilizing the existing municipal infrastructure and the subject lands are located within an area with lands planned for similar heights and densities. The proposed density furthermore supports the achievement of complete communities (located in the vicinity of supportive uses, transit services, active transportation network, etc.) and provides for a transit-supportive form. This density provision ensures that the building can proceed with residential units in the place of the proposed upper level office uses if the space required for office uses is eliminated or reduced.

3. Reduce Required Amount of Landscaped Open Space

The ZBA requests a minimum landscaped open space requirement of 20% whereas Section 7.10 requires a minimum of 30%.

A reduction in the amount of required landscaped space is required to facilitate the efficient development of the site. The proposed development continues to provide landscaping on the site in key locations, including around the perimeter of the site and along the frontage. A Landscape Concept Plan has been prepared by Hill Design Studios that illustrates the proposed landscaping along the frontage includes plantings, seating and pavers and that trees are also proposed and/or retained around the perimeter. The outdoor rooftop amenity area will also provide additional outdoor space for the residents of the site and it is furthermore recognized that the residents and patrons of the development have convenient access to Waterloo Park, adjacent to the site.

4. Reduce Height for Portion of First Storey

The ZBA requests a reduction for up to 50% of the first storey to have a minimum height of 3 metres whereas Section 7.10 requires a height of 4 metres for this storey. It is further provided that a maximum of 15% of the front building façade be affected by this provision.

This request allows for the height of the first storey and mezzanine structure (second storey) to respond to the grading on the site (slopes down to the east). The area of the first storey with the reduced height is located to the east (over a portion of the lobby) and along the southern segment of the first storey (following the mezzanine floorplate). A qualification has been added to the requested provision to ensure that the reduced height does not impact the active uses along the frontage (i.e. a maximum of 15% of the first storey along the front building façade may be at this height).

5. Increase Maximum Podium Height and provide a Podium Height Exclusion for the Breezeway

The ZBA requests a maximum podium height of 23 metres and 7 storeys and an exclusion from the podium height for the breezeway whereas Section 7.10 permits a maximum of 21 metres and 6 storeys.

The request for an additional storey within the podium is largely as a result of the change in grade (slope to the west) on the site facilitating the inclusion of two residential units in the western segment of the mezzanine floor (considered the second storey as a result). The proposed podium height generally reinforces the mid-rise street-wall and reinforces the human scale of development at the base of the building.

A breezeway is also situated on top of the mass of the podium to facilitate a connection between the amenity areas in the base of the towers and the rooftop amenity area. The breezeway is located in the

middle of the podium and would not be visible from a pedestrian point-of-view along the frontage. The scale of the podium from the public realm is not impacted by the breezeway feature.

6. Reduce Minimum Tower Separation Requirements

The ZBA requests a reduction in the tower separation requirements from a tower on the same lot (21 metres whereas 22 metres is required) and from interior lot lines (3 to 9 metres whereas 11 metres is required by Section 7.10).

The reduction in the tower separation from a tower on the same lot is relatively minor and is not expected to generate any impacts.

The general intent of the tower separation requirement from interior lot lines is to ensure sufficient separation is provided from possible future towers on adjacent lands. The following is acknowledged pertaining to the developability of adjacent lands:

- The lands located to the west and south form part of the University Stadium and Waterloo Park and are largely zoned Open Space (OS1). It is not anticipated that these adjacent lands will be developed with towers given their current uses and furthermore, these lands are not constrained to such development immediately adjacent to the subject lands (i.e. these properties have large areas).
- The property located to the east is currently developed with a mid-rise residential building. A single detached dwelling is located on the other side of the adjacent building which is then followed by an entrance to University Stadium. The reduction from 11 metres to 9 metres for the tower separation to the east is not anticipated to preclude the development of a tower on the adjacent lands to the east given that the reduction to this side is relatively minor.

7. Reduce Tower Stepbacks

The ZBA requests a reduction in tower stepbacks above the podium on the front building façade (50% at 1 metre), to the south (50% at 0 metres and the remaining at 2.5 metres), and to the west (85% at 0 metres) whereas Section 7.10 and 3.T.5.3 require 3 metre stepbacks for the same.

The following is acknowledged related to the requests for reduced and partially reduced stepbacks:

- The slender floorplates of the towers have been designed to accommodate stepbacks of varying depths above the podium that continue to reduce the bulk of the building mass by providing a distinction between the base (podium) and towers;
- The varying depths of the stepbacks provide for additional articulation in the towers;
- The stepback along the front building façade (along Seagram Drive) facilitates the transition (step down with the podium feature) towards the public realm to facilitate a human-scale along the frontage (i.e. comfortable pedestrian environment);
- The varying stepbacks to the south (rear) and west provide a visual transition between the podium and tower components and minimize the prominence of the towers (particularly with the carved-out corners) from the adjacent public and pedestrian realms (recognizing parking areas for University Stadium and Waterloo Park generally abut these lot lines).

8. Increase Amenity Space on Podium

The ZBA requests an increase in the maximum proportion of rooftop amenity area from the 20% set-out in Section 3.A.4.4 of the Zoning By-law to 40%.

As per Section 2 of the Zoning By-law, amenity area means an area designed for active and/or passive recreation for the exclusive use and benefit of the residents of the building. With the proportional increase of rooftop amenity space, the development continues to provide amenity space throughout the building, including at the ground level adjacent to the lobbies. The increase in the permitted proportion of rooftop amenity space facilitates the continuity of recreational spaces for the residents, recognizing that the majority of the indoor amenity space is located in the base of the towers and the location of the outdoor amenity space is situated on the podium rooftop between the towers. The request to increase the maximum portion of rooftop amenity area serves to provide for an enhanced amenity space for residents on the podium (i.e. conveniently connected programmed areas).

9. Location of Office Uses

The ZBA requests that office uses be permitted in the upper storeys of a multi-use building whereas Section 7.10.6 limits the location of ancillary uses to be abutting the front building façade and within the first storey.

The intent of the aforementioned provisions that are related to the location of ancillary uses is generally to ensure that such uses activate the pedestrian realms and to ensure that the primary use of the lands is residential. The proposed development provides commercial units along the frontage at-grade that meet this intent. The proposed commercial uses and the proposed upper level office uses meet all other regulations for ancillary uses established in Section 7.10.6 (excluding 'a' and 'b' pertaining to the location, as identified in **Table 4** of this Report), including that they shall not collectively exceed 15% of the building floor area (ensures the primary use of the lands is residential).

10. Underground Parking within Front Yard Building Line Setback

The ZBA requests that underground parking be permitted to have a 3 metre front yard building line setback whereas Section 6.2.1 requires a 5 metre setback.

The required front yard setback has been met for the podium above-grade; however, the underground parking structure encroaches within this area. Above the encroachment of the parking area into the required front yard, landscaping (including pavers and planters) is provided at-grade along the frontage. The mass of the building above-grade does not encroach into the front yard setback requirement and landscaping continues to be provided along the frontage with this provision for the location of underground parking. The configuration of the parking garage is generally necessitated by the limited existing property depth and road widening allowance.

11. Reduced Bicycle Parking Dimensions

The ZBA requests reduced requirements for the dimensions of vertical Type A bicycle parking spaces to facilitate a minimum width of 0.27 metres whereas 0.6 metres is required and an access isle width of 0.915 metres whereas 1.75 metres is required by Section 6.6.2 of the Zoning By-law.

The requested reduced bicycle parking dimensions provide for the efficient storage of bicycles and facilitates the provision of a total of 540 bicycle parking spaces within the secure storage areas to meet

the needs the residents. The vertical storage infrastructure intended to be implemented in the development functionally accommodates the intended arrangement and requires reduced dimensions.

12. Amenity Area Inclusions

The ZBA requests that washrooms, storage areas, circulation areas, and the like that are within the areas designed for active and/or passive recreation for the exclusive use and benefit of residents/tenants be included within the definition and calculation for amenity area whereas Section 2 of the Zoning By-law currently excludes these spaces from the definition of amenity area.

This requested provision serves to ensure that the spaces that are included for and are exclusively used by those accessing the amenity space will be counted as the same.



Figure 14 - City of Waterloo Zoning Bylaw 2018-050 Schedule A: Zoning Map






-  Subject Lands
-  Academic
-  Residential Mixed-Use
-  Open Space
-  Commercial





Figure 15 - Proposed Zoning

- Subject Lands
- Lands to be rezoned to "RMU-81(**)"



K:\152001_87-95 Seagram Drive, Waterloo\BPP\CPA_28November2025.dwg

6.0 Public Consultation Strategy

As of July 1, 2016, changes to the *Planning Act* (O. Reg 544/06, amended by O. Reg 178/16) require that applicants submit a proposed strategy for consulting with the public with respect to the application as part of the 'complete' application requirements. This section satisfies this requirement.

We propose that the public consultation process for the proposed OPA and ZBA Application follow the *Planning Act* statutory requirements and the City's standard practices (including the City's two-staged public process which includes an early informal public meeting to receive public comments and a subsequent formal public meeting at Council for a decision).

The *Planning Act* requires at least one statutory public meeting for each project, which we propose to undertake. The notice for the statutory public meeting will be promoted by:

- Posting a notice on the City's website;
- Advertising in a local newspaper; and
- Mailing a notice to property owners within 120 metres of the proposed development.

At least 20 days in advance of a meeting, the notice of the statutory public meeting will be circulated with information on the project.

The consultation strategy described herein will ensure that members of the public are given the opportunity to review, understand and comment on the proposed development and Application, while ensuring the Application is processed in a timely manner. Additional opportunities for consultation will be considered and may be warranted based on the input received at the Public Meeting. In addition, at the City's discretion an informal Neighborhood Meeting could also be held.

7.0 Summary & Conclusions

As outlined in this Report, accompanied by the supporting technical studies, plans and reports, the proposed Application is appropriate for the subject lands and represents good planning for the following reasons:

- The proposed Application is consistent with the Provincial Planning Statement (2024);
- The proposed Application conforms to and implements the objectives and policy direction of the Regional Official Plan, including the policies related to intensification, housing and source water protection;
- The proposed Official Plan Amendment pertaining to the increase in height, as set out in this Report, is appropriate for the subject lands and in our opinion, the proposal satisfies all other applicable policies of the City Official Plan (as amended by OPA 58);
- The proposed Application supports the City to achieve population forecasts, housing targets and intensification targets (including the density minimum with the MTSA);
- The proposal provides for a transit-supportive density that contributes to the range and mix of housing options within the Planning District and supports the achievement of complete communities (including consideration for the proximity of the subject lands to supportive uses and transit);
- Adequate servicing infrastructure and capacity is available to accommodate the proposed development; and
- The proposed site-specific amendments to the City's Zoning By-law will appropriately implement the intended building design and site layout.

Accordingly, the proposed Application allows for a high-density mixed-use development that contributes to the housing options in the neighbourhood, is compatible with the surrounding area, is well serviced by existing community uses and resources, and efficiently uses the subject lands and applicable infrastructure and transit services.

Respectfully submitted,
MHBC



Pierre Chauvin, MA, MCIP, RPP
Partner

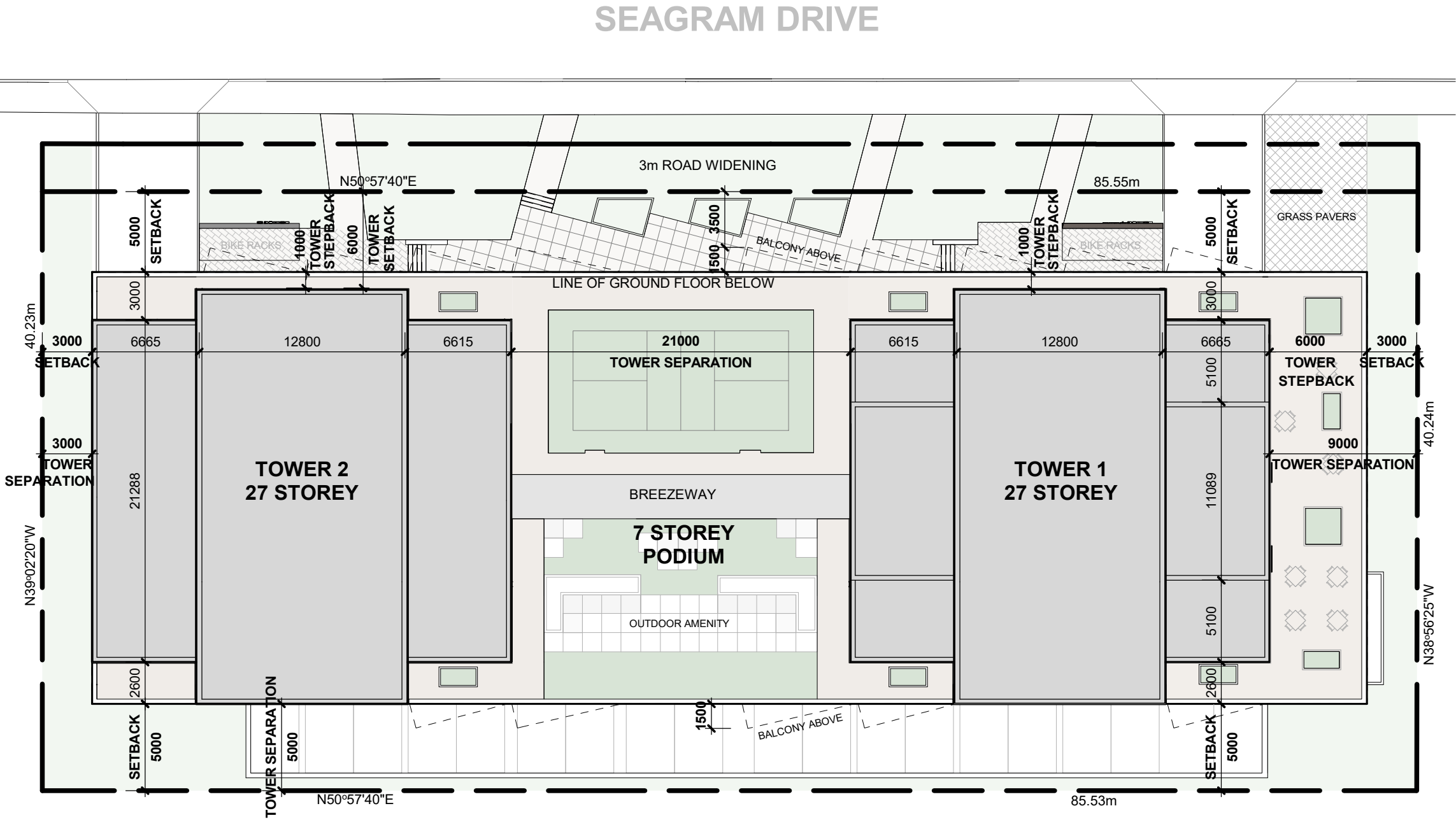


Rachel Mantel, MSc
Intermediate Planner

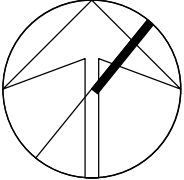
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Appendix A: Architectural Package

DETAILS OF DEVELOPMENT			
DATA		REQUIRED	PROVIDED
ZONING		RMU-81	RMU-81() 'site specific'
GROSS LOT AREA (m²)		3444	
AREA OF ROW(m²)		253	
NET LOT AREA (m²)		3190	
BUILDING AREA (m²)		2085	
SETBACKS	STREET LINE (m)	5.0	5.0
	REAR YARD (m)	5.0	5.0
	SIDE YARD (m)	3.0	3.0
MIN. LOT FRONTAGE (m)		20	85.55
NUMBER OF STOREYS		25	34
BUILDING HEIGHT (m)		81	111
HEIGHT OF FIRST STOREY (m)		4.0	3.0
DENSITY CALC. AFTER ROAD WIDENING (BEDS PER HA)		823	3123
DENSITY CALC. BEFORE ROAD WIDENING (BEDS PER HA)		750	3367
NUMBER OF UNITS 1 BED : 220 UNITS 2 BED : 72 UNITS 3 BED : 210 UNITS 4 BED : 20 UNITS		522	
NUMBER OF BEDROOMS		240	1074
PODIUM HEIGHT (m)		21.0	27.0
TOWER SEPARATION (m)		22.0	21.0
TOWER AREA (m²)		1000	2 X 617
TOWER STEPBACK FY (m)		3.0	1.0
TOWER STEPBACK SY W (m)		3.0	0.0
TOWER STEPBACK SY E (m)		3.0	6.0
AMENITY AREA 3m² / UNIT + 2m² / ADDITIONAL BEDROOM		3(522) +2(552)= 2670	FIRST FLOOR=70 MEZZANINE= 142 7TH FLOOR= 1041 OUTDOOR 7TH FLOOR= 534 BALCONIES= 917 TOTAL= 2704
LANDSCAPE AREA (m²)		961	652
LANDSCAPE AREA (%)		30%	20%
PARKING REQUIRED		N/A	RESIDENT: 69 VISIT/COMM: 7 TOTAL: 76
BARRIER FREE PARKING (4%)		3.04	4
BICYCLE PARKING 0.3 / UNIT TYPE A: 0.3 / UNIT TYPE B:		TYPE A: 157 TYPE B: 157 TOTAL: 314	TYPE A: 540 TYPE B: 20 TOTAL: 560
GARBAGE ENCLOSURE		INDOOR	



SITE AND ROOF PLAN
SCALE: 1 : 300



MIXED USE BUILDING

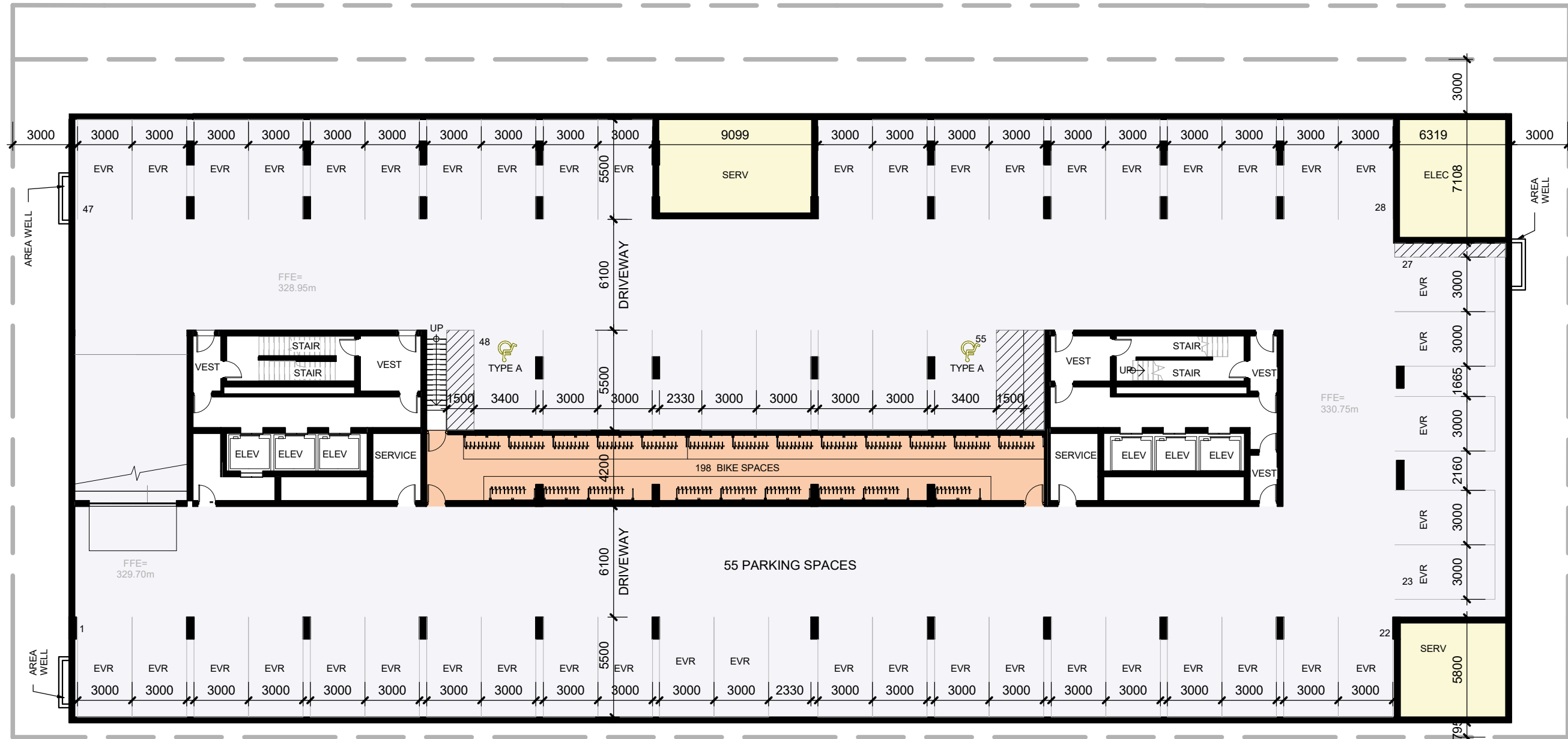
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WATERLOO
2025.12.23






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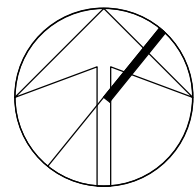


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BASEMENT LEGEND

-  BIKE STORAGE
-  PARKING AND DRIVE AISLES
-  SERVICES



BASEMENT FLOOR PLAN

SCALE: 1 : 250

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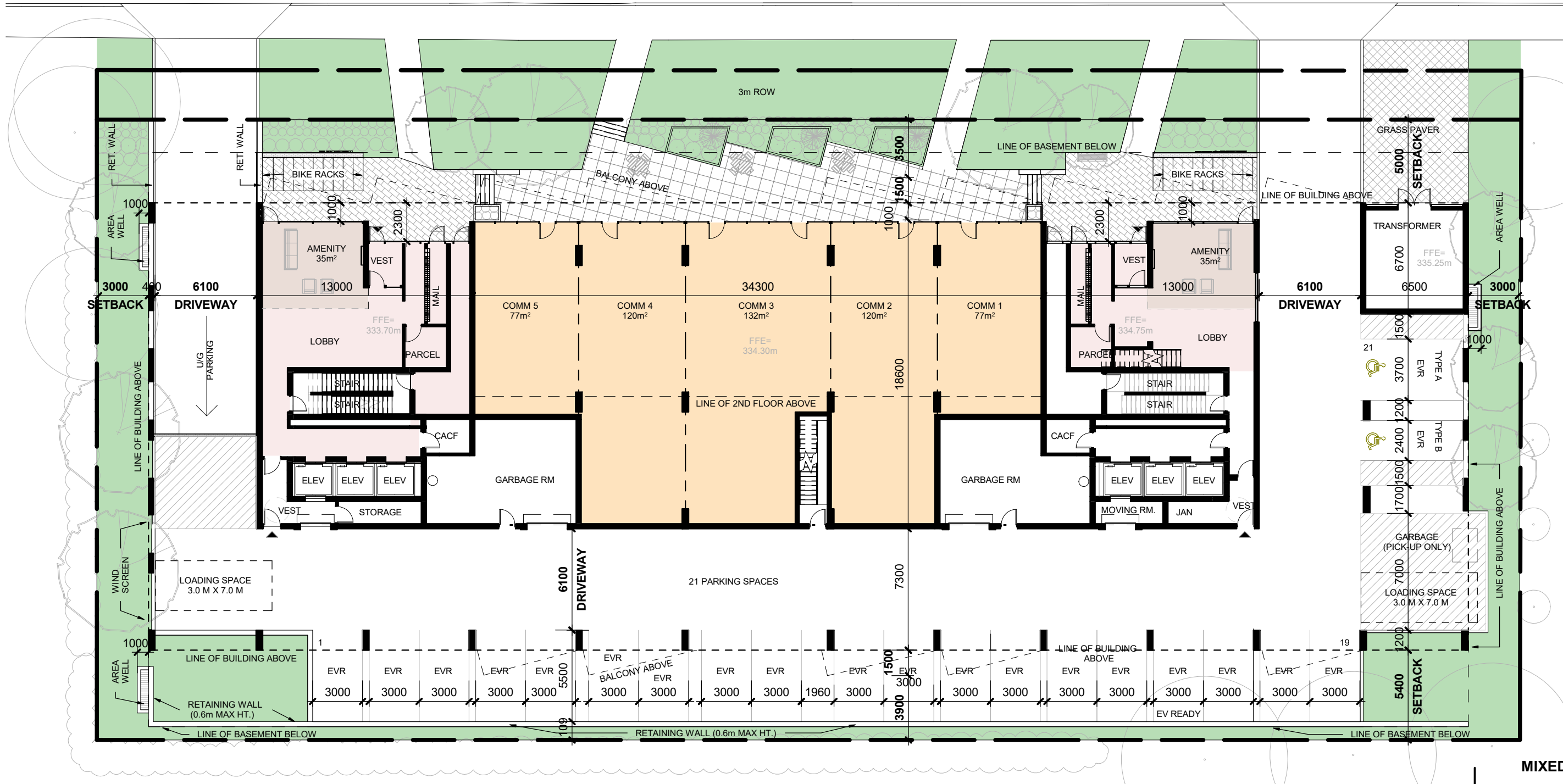


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SEAGRAM DRIVE



SITE LEGEND

- AMENITY
- COMMERCIAL
- LOBBY
- SOFT LANDSCAPE



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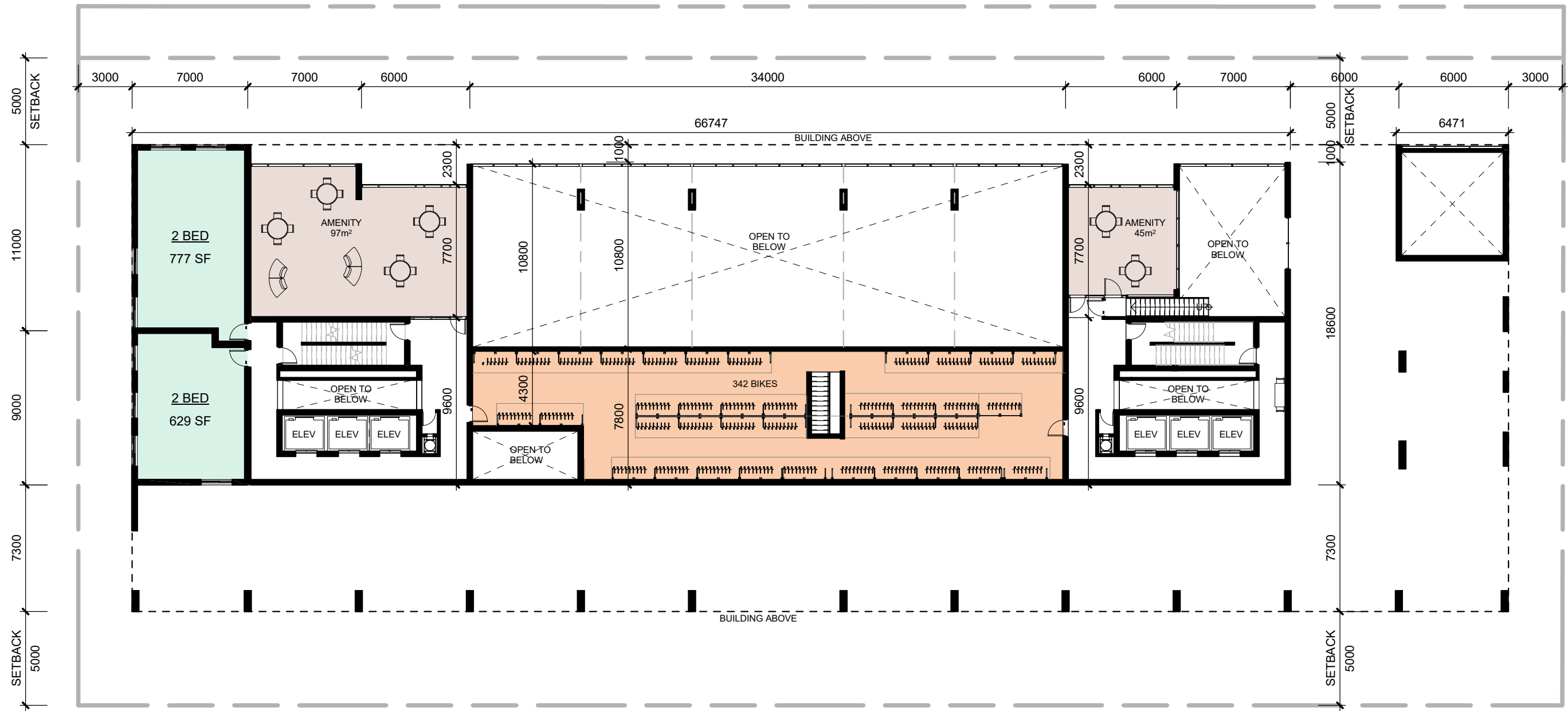


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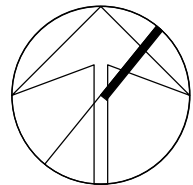
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SITE & GROUND FLOOR PLAN
SCALE: 1 : 250



2ND FLOOR LEGEND

- 2 BED
- AMENITY
- BIKE STORAGE



2ND FLOOR PLAN

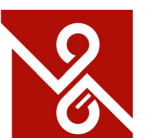
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MIXED USE BUILDING

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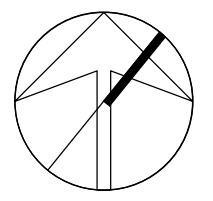


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UNIT LEGEND

- 1 BED
- 2 BED
- 3 BED
- 4 BED



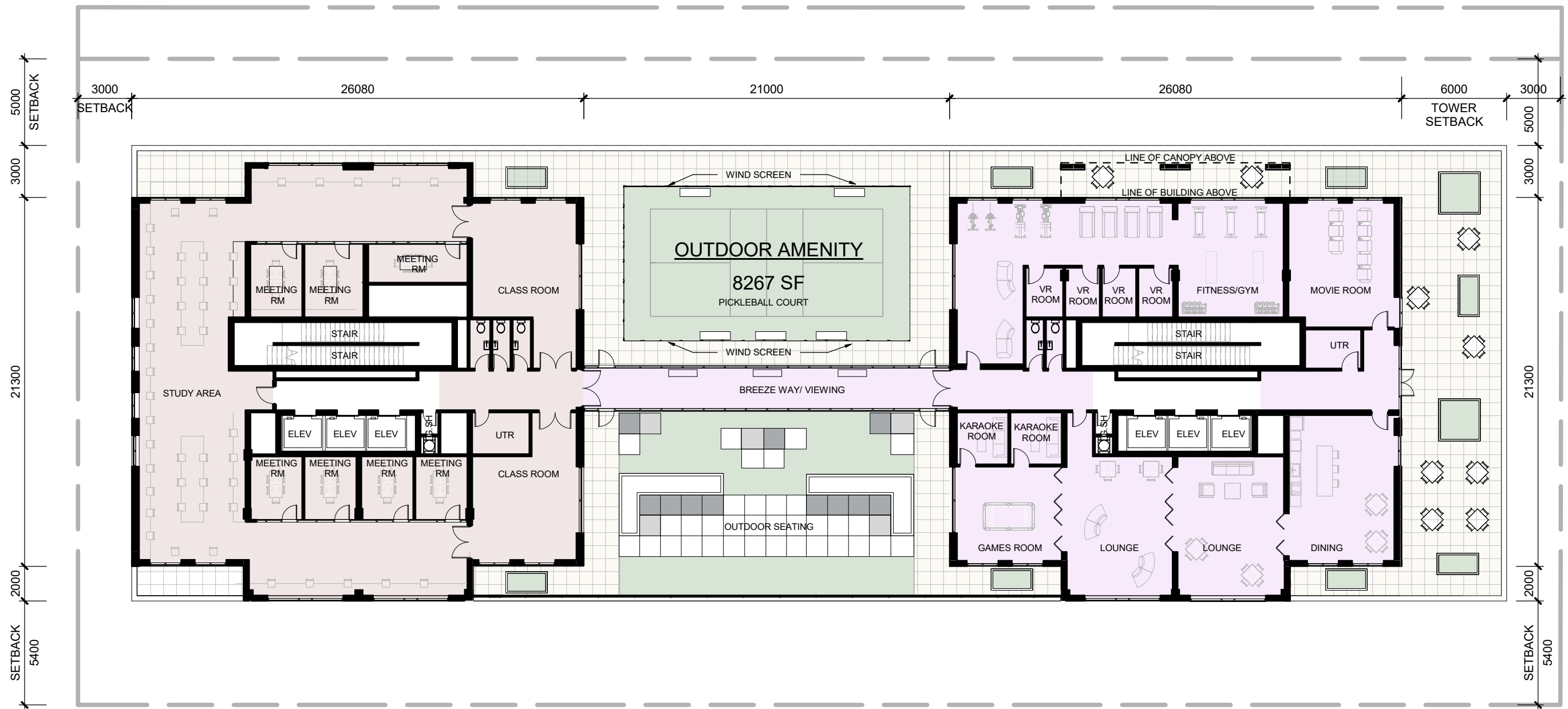
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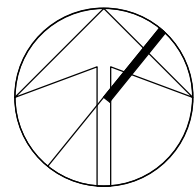
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AMENITY LEGEND

- OUTDOOR AMENITY
- RECREATIONAL
- STUDY



8TH FLOOR AMENITY PLAN

SCALE: 1 : 250

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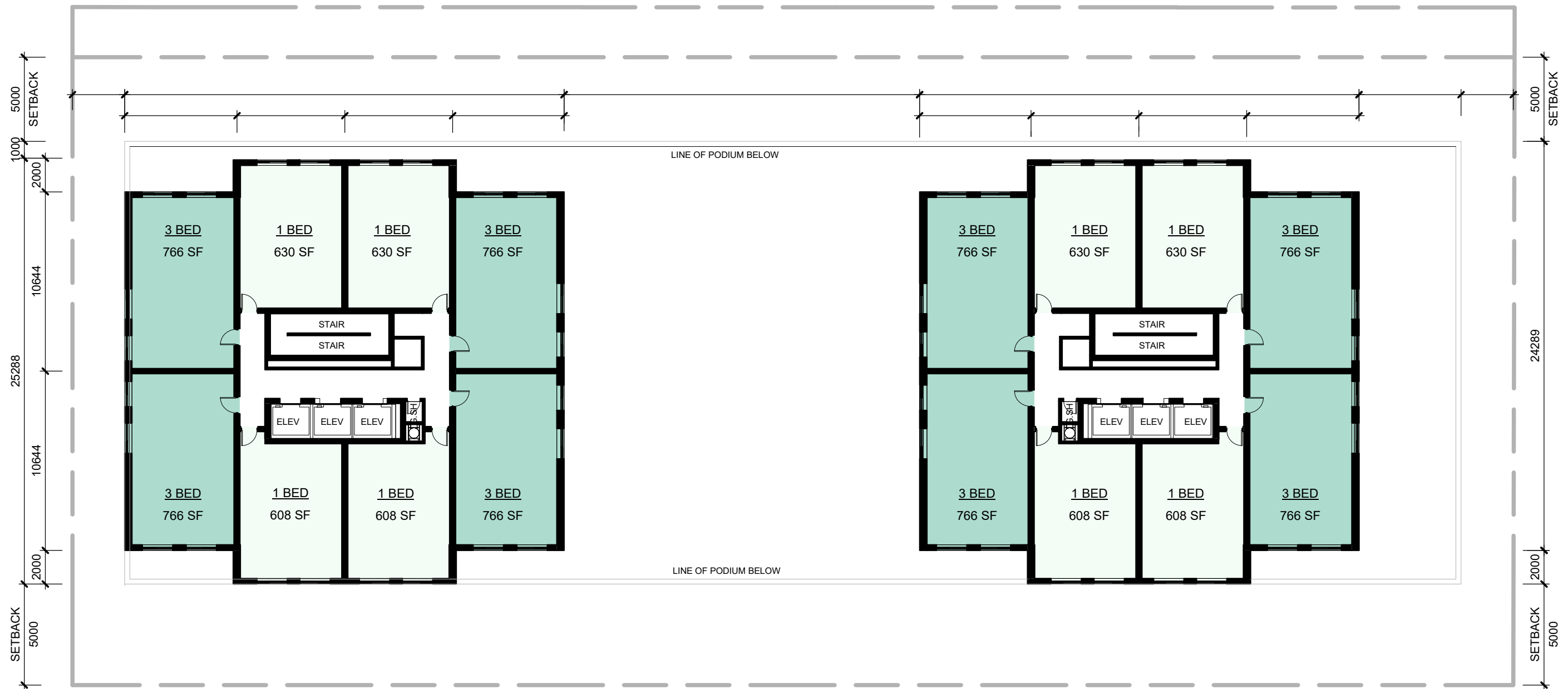
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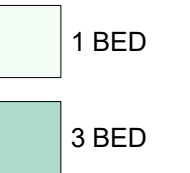
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UNIT LEGEND



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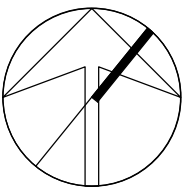
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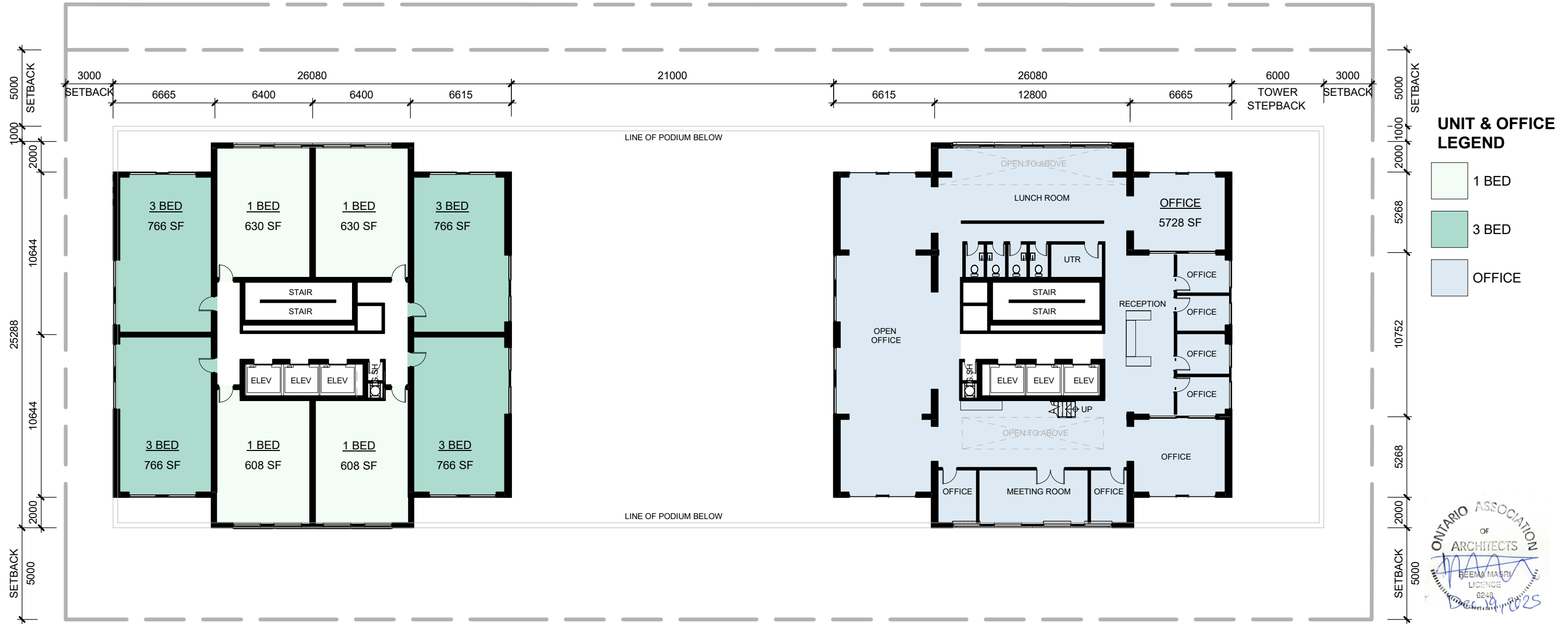


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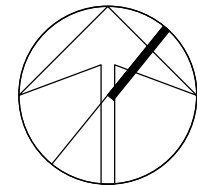
9TH-32ND FLOOR PLAN

SCALE: 1 : 250



33RD FLOOR PLAN

SCALE: 1 : 250



MIXED USE BUILDING

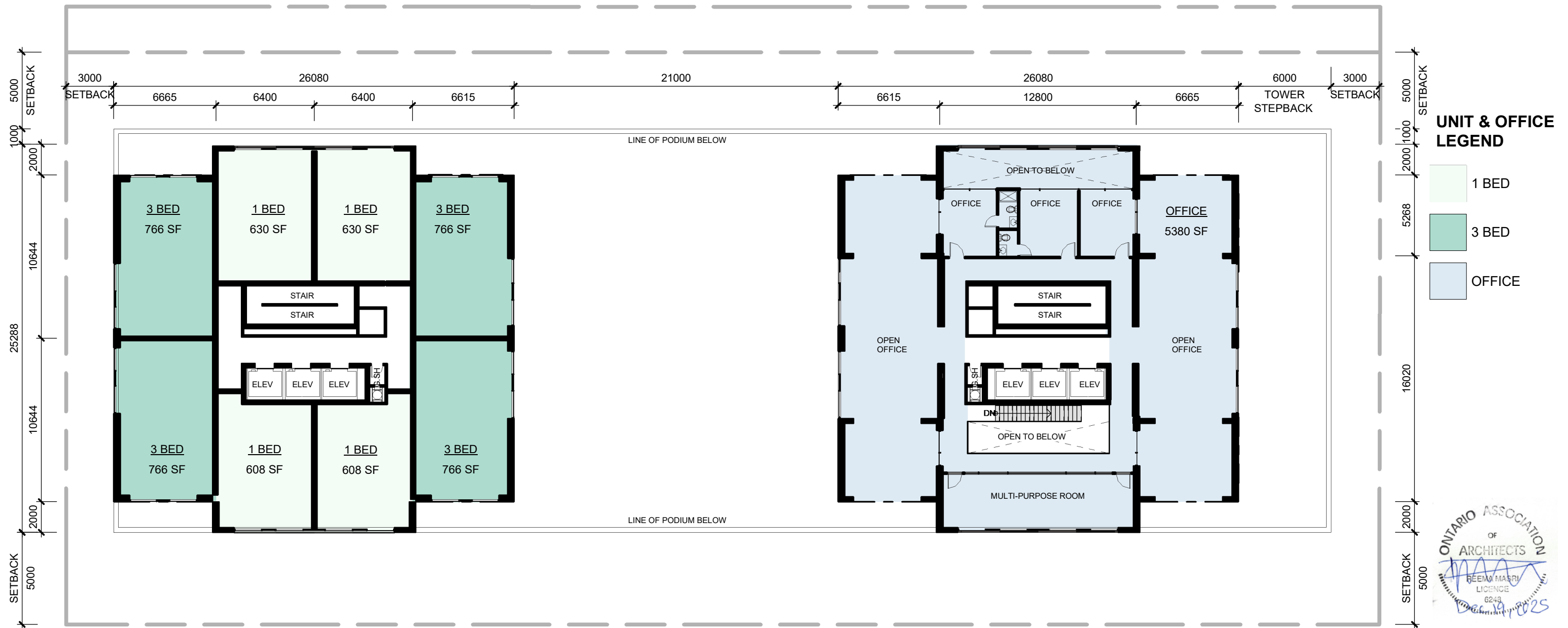
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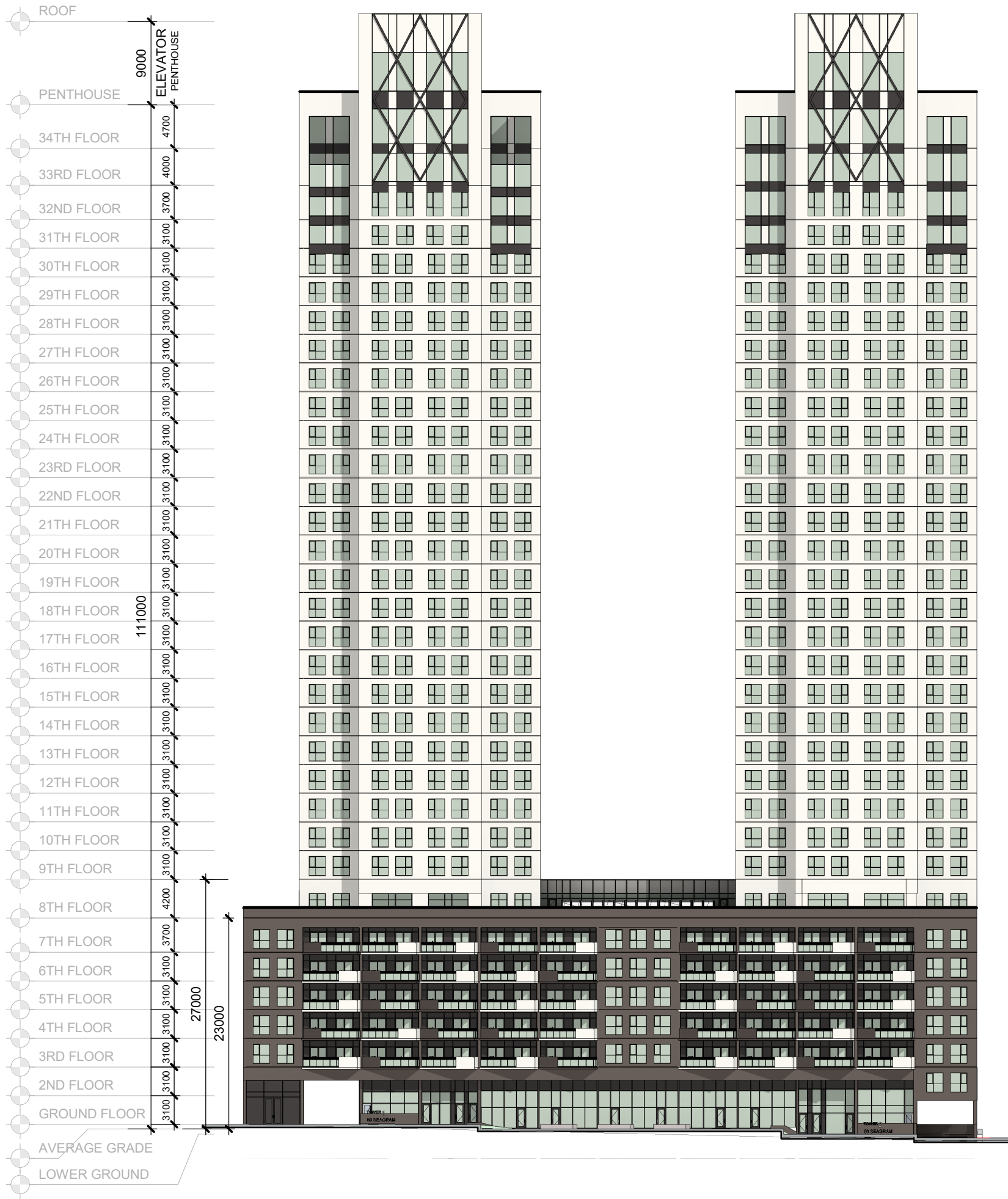
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SCALE: 1 : 250

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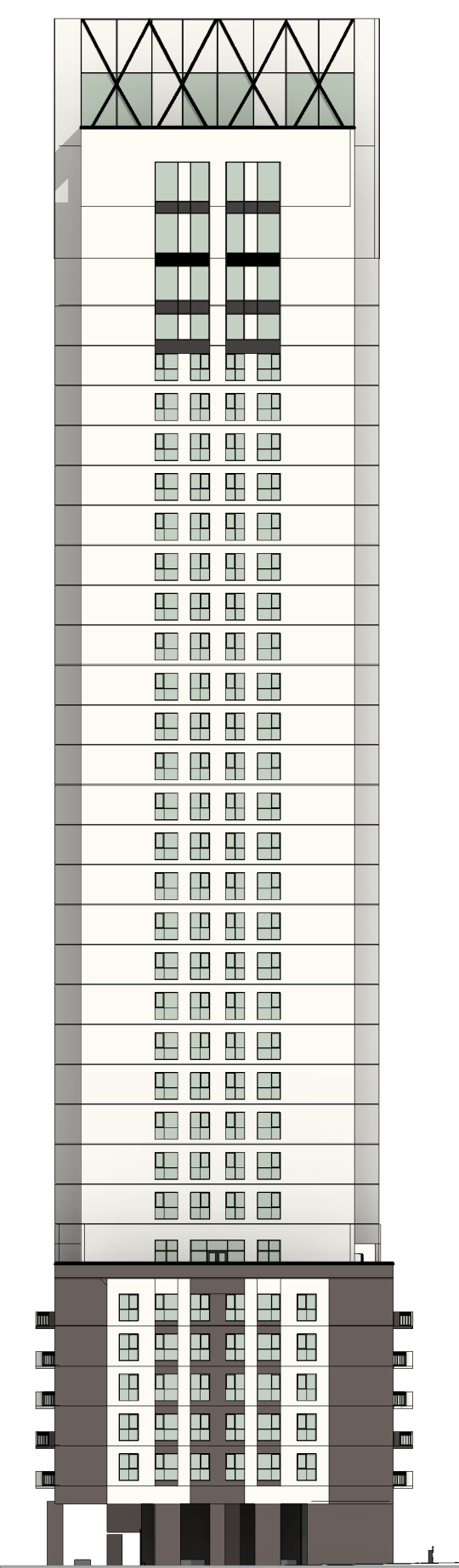
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NORTH ELEVATION (SEAGRAM DRIVE)
SCALE: 1 : 500



EAST ELEVATION
SCALE: 1 : 500

ELEVATIONS



ELEV - 333.24 ELEV - 333.75 ELEV - 334.25 ELEV - 334.76 ELEV - 335.25
AVERAGE GRADE = $333.24+333.75+334.25+334.76+335.25/5=$ **334.25**



MIXED USE BUILDING

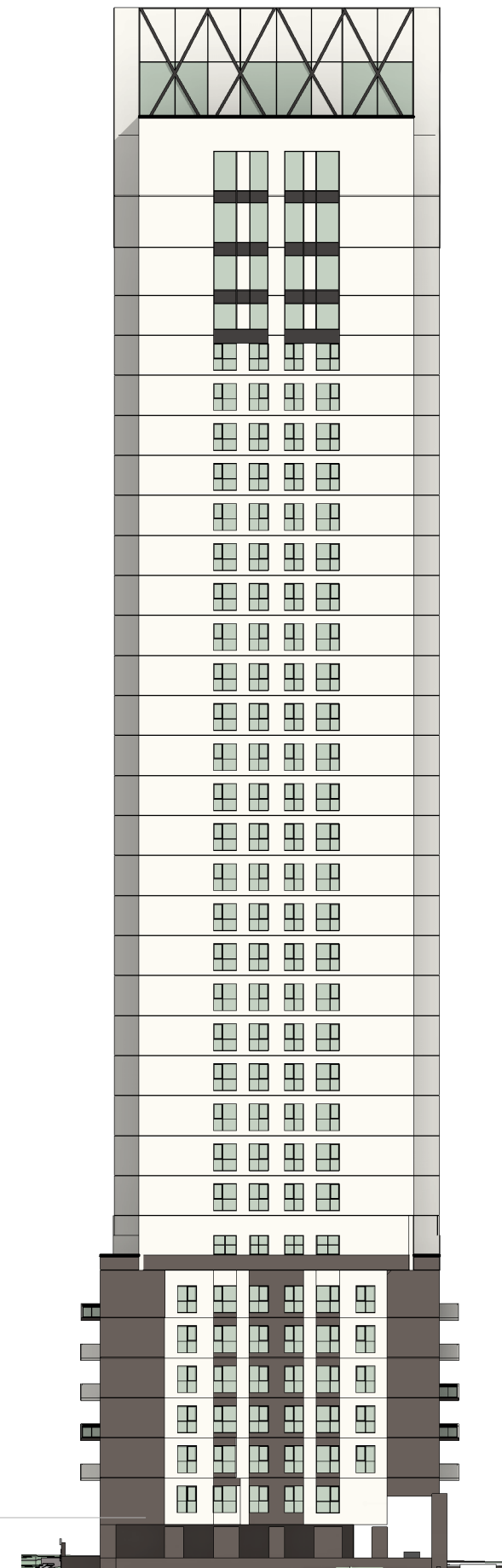
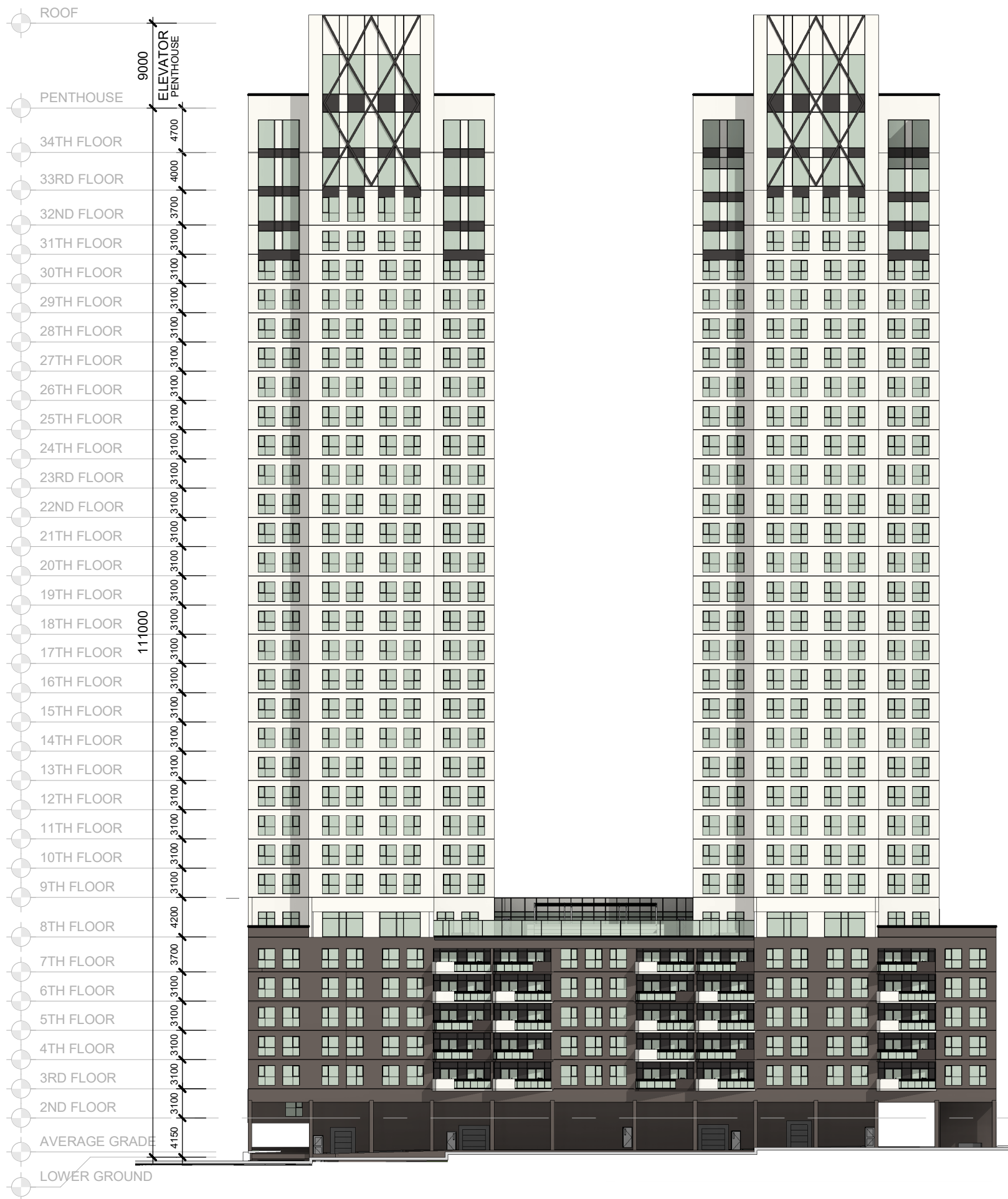
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ELEVATIONS



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