

October 13, 2023

File No. 11114

City of Waterloo
Development Planning, Integrated Planning & Public Works, 2nd Floor
100 Regina Street South
Waterloo, Ontario
N2J 4A8

Attention: Rita Szilock, MCIP, RPP
Senior Development Planner

Dear Ms. Szilock:

**Re: PLANNING JUSTIFICATION - ADDENDUM
Official Plan Amendment No. 32
Zoning By-law Amendment Z-21-03
525 and 565 Conestogo Road**

On behalf of 65 Northfield Drive Inc., we are pleased to submit the following addendum planning commentary and justification for the above-noted development, to be reviewed in conjunction with the Planning Justification Report, dated June 2021 (the "Planning Justification Report"), and the Planning Justification Report – Addendum Letter, dated March 29, 2023 (the "Planning Addendum").

Refined Development Concept

The development concept associated with the above-noted applications was refined in September 2023 to now include the following:

- A total of 8 future development blocks, which included the following:
 - Block 1, containing one 20-storey tower as well as future non-residential uses at the corner of Northfield Drive and Conestoga Road
 - Block 2, containing one 25-storey tower as well as a portion of a proposed community park (Please note that Block 2 and Block 6 are connected by a 6-storey podium)
 - Block 3 containing one 30-storey tower and one 35 storey tower connected by a 6-storey podium as well as additional community park space
 - Block 4 containing one 28-storey tower and one 31-storey connected by a three-storey podium

- Block 5 containing two 31-storey towers connected by a 3-storey podium
- Block 6 containing one 25-storey tower as well as a portion of a proposed community park (Please note that Block 2 and Block 6 are connected by a 6-storey podium)
- Block 7 containing one 18-storey tower with a 6-storey podium as well as future non-residential space oriented towards Conestogo Road and the hydro corridor and additional community park space providing for a connection to the adjacent hydro corridor
- Block 8 containing one 35-storey tower and one 25-storey tower connected by a 6-storey tower and additional community park space
- Proposed future right-of-way with two (2) access points along Conestogo Road
- Central community park associated with Blocks 2 and 6 as well as additional community park space associated with Blocks 3 and 7
- A total of 3,353 residential dwelling units (density of 950 bedrooms per hectare, which excludes area associated with proposed park space as well as future right of way)
- A total of approximately 8,000 m² of non-residential gross floor area
- A total of 2,515 parking spaces contained wholly within underground and podium parking structures

Revised Official Plan Amendment

Further to Section 4.1 of the Planning Justification Report and Planning Addendum, the following is a summary of the current request for Official Plan Amendment and associated planning justification:

- Redesignate portion of the property north of the hydro corridor from “Employment” to “Mixed-Use Community Commercial” with the following site-specific policies:
 - Lands designated as Mixed-Use Community Commercial may be zoned to permit dwelling units, townhouse blocks, live/work units and home occupations as primary permitted uses as well as a health practitioner, model suite and temporary sales centre as a complementary use
 - Residential uses shall be permitted within individual buildings and/or within mixed-use buildings, and in the first storey of Blocks 2, 3, 4, 5, 6 and 8
 - The implementing Zoning By-law shall include the following:

- A maximum building height of 35 storeys (118 metres)
- A maximum density of 950 bedrooms per hectare and a maximum of 5,197 bedrooms
- A minimum non-residential gross leasable space of 8,000 square metres

The following is a summary of the key changes and modifications to the proposed Official Plan Amendment since the submission of the initial Planning Justification Report and subsequent Planning Addendum:

1. Redesignation to “Mixed Use Community Commercial”

The City indicated that the Mixed Use Community Commercial designation is the preferred land use designation for the property, given the mixed-use nature of the Proposed Development, the provision of the community park and amenity space and the intent to provide for active and useable non-residential space.

2. Increase in maximum density to 950 bedrooms per hectare

The property is located between two Major Transit Station Area (MTSA), which are areas intended to accommodate higher densities that support transit infrastructure, affordable housing initiatives, and active transportation opportunities. The proposed maximum density of 950 bedrooms per hectare is consistent with policy intent within MTSA’s.

Furthermore, the City indicated the density calculation for the Proposed Development should exclude area devoted to the municipal right-of-way and the proposed POPs space (community amenity space). While the overall unit count has decreased from a total 3,980 dwelling units to a total of 3,353 dwelling units, the total area used to calculate density has been significantly restricted; this has resulted in an increase in overall maximum density.

3. Increase in minimum non-residential gross leasable space

The Official Plan Amendment has been revised to include a provision for minimum non-residential gross leasable space, to reflect the City’s intent with respect to the Mixed Use Community Commercial designation and the intended mixed-use nature of the proposed development. The intent is to identify minimum non-residential gross leasable floor space to be applied across the entire site; the proposed Official Plan Amendment does not include the identification of specific locations of such uses.

Revised Zoning By-law Amendment

Further to Section 4.2 of the Planning Justification Report and Planning Addendum, the following is a summary of the current request for Zoning By-law Amendment and associated planning justification:

- Rezone the portion of the property north of the hydro corridor as Mixed-Use Community Commercial (C1-81) and Parks & Recreation (OS-1)
- The following site-specific exceptions are proposed for the C1-81 Zone:
 - Maximum density of 950 bedrooms per hectare, to be applied across the entire site
 - Maximum building height of 35 storeys (118 metres)
 - Minimum non-residential gross leasable floor area of 8,000 m²
 - Reduced front yard, flankage yard, side yard and/or rear yard setbacks for Northfield Drive, Conestogo Road, Highway 85, the hydro corridor and the future municipal road
 - A minimum tower separation of 11 metres from an interior lot line, and a minimum tower separation of 22 metres for towers sharing an interior lot line
 - A maximum tower dimension of 45 metres for Block 1, 3 and 8
 - A maximum tower footprint of 1,050 m²
 - A minimum residential parking rate of 0.75 spaces per dwelling (inclusive of visitor parking)
 - A minimum non-residential parking rate of 2.0 spaces per 100 m² of building floor area
 - Modified regulations for structured parking
- The following site-specific exceptions are proposed for the OS-1 Zone:
 - Permitted uses to include privately owner, publicly accessible park space
 - Underground parking and/or structures
 - Building and/or structures to implement sustainable infrastructure.

The following is a summary of the key changes and modifications to the proposed Zoning By-law Amendment since the submission of the initial Planning Justification Report and subsequent Planning Addendum:

1. Increased maximum density

As noted previously, the property is located between two Major Transit Station Area (MTSA). The proposed maximum density of 950 bedrooms per hectare is consistent with policy intent within MTSA's to accommodate higher density development that supports transit infrastructure and active transportation.

Furthermore, the City indicated the density calculation for the Proposed Development should exclude area devoted to the municipal right-of-way and the proposed POPs space (community amenity space). While the overall unit count has decreased from a total 3,980 dwelling units to a total of 3,353 dwelling units, the total area used to calculate density has been significantly restricted; this has resulted in an increase in overall maximum density.

2. Increased maximum building height

A maximum building height of 35 storeys (118 metres) has been proposed to reflect the prestige location and opportunity for urban redevelopment and intensification associated with the site. The property is strategically located between two major transit station areas and is an ideal location for urban intensification. The tallest of the buildings associated with the proposed development (two (2) 35-storey towers) have been situated at the rear of the property at opposite ends of the site, adjacent to Highway 85.

3. Minimum non-residential gross leasable floor area

As noted previously, a minimum non-residential gross leasable space has been proposed to reflect the City's intent with respect to the Mixed Use Community Commercial designation and the intended mixed-use nature of the Proposed Development. The intent is to identify minimum non-residential gross leasable floor space to be applied across the entire site; the proposed Zoning By-law Amendment does not include the identification of specific locations of such uses.

4. Reduced yard setbacks

Reduced setbacks are proposed along all street frontages as well as hydro corridor in an effort to maximize opportunities for underground parking. The provision of a municipal right-of-way and future POPs (community amenity space) presents unique challenges in terms of underground structures and strata subdivision of the overall site. The underground parking has been designed to exclude any structure underneath the proposed right-of-way.

The reduced setbacks along the existing and future right-of-ways creates a consistent, cohesive and active streetscape while providing opportunities for sufficient landscaping and street tree planting.

The proposed reduced yard setbacks have been accounted for as part of the proposed 18.0 metres right-of-way previously submitted to the City.

5. Tower separation

Alterations to the required tower separation are proposed to reflect the development concept and future lot lines created by the draft plan of subdivision. The proposed development has been designed to provide for adequate separation between towers (typically greater than 22 metres); however, given the layout of the proposed development and the associated block layout of the draft plan of subdivision, towers may be situated closer to a future interior lot line than the current minimum requirement.

6. Increased tower dimensions and tower footprints

Blocks 1, 3 and 8 are intended to accommodate future purpose-built rental towers. The increase in tower dimension to 45 metres for each of these towers reflects the specific design considerations typically associated with the construction of rental buildings, including floor plan layout, hallways and access, and unit size. Purpose-built rental towers typically have a more rectangular footprint to reflect these considerations. A typical rental building conceptual floor plan/layout has been appended to this letter to demonstrate these unique design considerations.

The maximum tower footprint is proposed to be slightly increased to reflect the associated development concept. The marginal increase in the maximum tower footprint is in response to the evolving demands of the urban development; it optimizes space utilization, creating more spacious rental units that cater to modern urban families and shared housing arrangements while providing for economic benefits without significantly altering the cityscape. The proposed increased in maximum tower footprint from 1,000 m² to 1,050 m² represents a very minor 5% increase, which is visually unmeasurable.

7. Reduced parking rate

Zoning By-law 2018-050 identifies reduced parking standards for certain priority areas throughout the City, including areas within Uptown Waterloo and areas surrounding MTSA's. The proposed minimum residential parking rate of 0.75 spaces per dwelling unit (inclusive of visitor parking) is consistent with the reduced parking rate contained within Zoning By-law 2018-050 and currently applied to areas surrounding both the Northfield and Conestoga Mall MTSA's.

Similarly, a proposed minimum parking rate for non-residential uses of 2.0 spaces per 100 m² of building floor area has been included, which is consistent with the reduced parking requirements contained within Zoning By-law 2018-050 for MTSA's.

8. Modified regulations for structured parking

The proposed development includes underground and structured parking designed to take into account the considerable grade change along the northern edge of the property along Northfield Drive. While Block 3 includes structured parking that is technically considered at-grade, the structured parking is blended with the grade change and is visually discreet along Northfield Drive. The proposed regulation for structured parking includes a specific measurement from Conestogo Road to ensure the at-grade parking structure is not noticeable along the Northfield Drive frontage of the property.

9. Permissions for OS1 Zone

The proposed site-specific exceptions for the OS1 Zone will establish permission for POPs to be considered for public park purposes and reflect the proposed parking structure and other sustainability features that may be located under the POPs block.

We trust the above-noted commentary provides sufficient planning commentary and justification related to the refined development concept and revised, proposed Official Plan and Zoning By-law Amendments. Please don't hesitate to contact me if you have any questions or require further information.

Sincerely,
GSP Group Inc.



Kristen Barisdale, MCIP, RPP
Vice-President, Planning