November 7, 2025

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Manager of Planning Approvals
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100 Regina Street South
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Re: Application to Remove Holding Provision
247, 249, & 251 Hazel Street, City of Waterloo

On behalf of 251 Hazel Inc. ("Owner"), we are pleased to submit the enclosed application to remove the Holding Provision for the property known municipally as 247-251 Hazel Street in the City of Waterloo ("Subject Site"). The Planning Partnership ("TPP") is the planning consultant for the proposal to redevelop the Subject Site for a 12 storey mixed-use building, consisting of 94 dwelling units, 176 square metres of commercial floor area, 8 vehicular parking spaces, and 26 bicycle parking spaces ("Proposed Development").

The Proposed Development is subject to a Site Plan Application (SP-25-18), which is being actively advanced in collaboration with City staff. The third submission of the Site Plan application will be made concurrently with this application, and we expect will allow for staff endorsement of the Site Plan application in early December. As such, we were instructed by City staff to move forward with this application to remove the Holding Provision from the Subject Site.

This Letter will build upon the more thorough analysis of the Proposed Development that was provided in the Planning and Urban Design Brief (August 1, 2025), and specifically address the conditions of the applicable Holding provision.

PROPOSED DEVELOPMENT

As noted above, the Proposed Development constitutes a 12-storey mixed-use building that will optimize the redevelopment potential of the Subject Site and represents transit-supportive development within the University of Waterloo Major Transit Station Area ("MTSA"). The Proposed Development incorporates well-sculpted building massing that is further accentuated by an under-stated building design.

Proposed Development Statistics

# of Units/Bedrooms	94
Commercial GFA	175.75 m^2
Vehicular Parking	8 spaces
Bicycle Parking	26 spaces

Active commercial uses are proposed to occupy about 75% of the Hazel Street building frontage, with the residential lobby occupying the remaining 25%. This will facilitate an active and engaging pedestrian environment along Hazel Street, that will be further supported by an enhanced streetscape with a wider sidewalk and new street trees.

Public transit and active transportation are prioritized by providing convenient connections to the City's active transportation network, and providing for a modest vehicular parking supply that we feel is appropriate given the Subject Site's access to excellent public transit services.

As reviewed in detail in the Planning & Urban Design Brief that was submitted as part of the Site Plan application, as well as subsequent resubmissions of the Site Plan application, the Proposed Development has been designed in almost full compliance with applicable Official Plan policies and Zoning by-law provisions, requiring relief from only three zoning provisions through a future Minor Variance application (see Attachment 1 – Zoning Matrix).

SITE PLAN APPLICATION

The Site Plan application to permit the Proposed Development was originally submitted to the City on July 18th. The second and third submissions of the Site Plan application were made on October 3rd and November 7th, responding to minor technical comments from the City and other commenting agencies. Based on recent coordination with City staff, we expect that the November 7th resubmission will address all remaining technical comments, leading to staff endorsement of the Site Plan application in early December.

Through the Site Plan application process, the three zoning deficiencies outlined in Attachment 1 have been confirmed, as has the Minor Variance application process to address these deficiencies. It is expected that the Minor Variance application will be submitted in December, shortly after staff endorsement of the Site Plan application is provided.

ZONING BY-LAW

The Subject Site is zoned Residential Northdale -12 (NR-12) with Site-Specific Exception 182 and a Holding (H) provision. As outlined in Attachment 1 to this letter, the Proposed Development complies with all applicable zoning provisions except for the following:

- Active Frontage Lot – Building Floor Area Regulations: The Zoning By-law allows a maximum of 30% of the ground floor area to be occupied by uses/functions listed in provision 7.13.10.2. Such uses/functions occupy 31% of the ground floor in the Proposed Development.

- Building Stepback Above the Podium: The Zoning By-law requires a minimum 3 metre stepback above the entire podium footprint. The Proposed Development meets and exceeds this requirement except for 9-metre wide sections at the front and rear, where no

stepback is provided in order to create additional visual interest for the proposed massing and building design.

- Maximum Podium Height: The Zoning By-law permits a maximum podium height, whereas a podium height of 20.7 metres is proposed in order to incorporate a taller ground floor that can better accommodate loading functions as well as delivery of the hydro transformer.

As noted above, a Minor Variance application will be submitted to address these deficiencies, after staff endorsement is provided for the Site Plan application.

HOLDING PROVISION REMOVAL

As noted above, the Subject Site is currently zoned with a Holding provision, with the conditions of the Holding provision outlined in Provision 7.13.17 of the Zoning By-law. The Planning and Urban Design Brief demonstrated how each of the conditions have been satisfied by the Proposed Development and associated Site Plan application. Updated responses to these conditions are provided as follows:

a) *Verification of sufficient servicing capacity (water, sanitary and stormwater) to fully service the LOT and development thereon.*

   A Functional Servicing and Stormwater Management Report prepared by Grit Engineering Inc. was included as part of the previously submitted Site Plan application. The report concludes that the Proposed Development can be "serviced by the existing and proposed onsite infrastructure". This conclusion has been confirmed through the Site Plan application process.

b) *Verification of sufficient transportation capacity and transportation infrastructure within the surrounding road network affected by the development and or use of the LOT.*

   A Transportation Impact Study and TDM Plan prepared by Paradigm Transportation Solutions Limited was included as part of the previously submitted Site Plan application. The Study confirms that there is sufficient transportation capacity and infrastructure, and finds that the Proposed Development will have a "negligible impact on traffic operations at the intersection of University Avenue and Hazel Street". This conclusion has been confirmed through the Site Plan application process.

c) *For known or suspected contaminated sites as identified by the REGION, verification from the REGION and or the Province of Ontario that the owner has completed a Record of Site Condition.*

The Subject Site is not identified as a known or suspected contaminated site by the Region, and has historically been used for residential purposes. As such, a Record of Site Condition is not required.

d) *Where an increase in BUILDING density is proposed pursuant to Section 37 of the PLANNING ACT, the completion and registration of an agreement pursuant to subsections 37.3 and 37.4 of the PLANNING ACT between the owner and the CITY.*

The Proposed Development is not pursuing an increase in building density. Therefore, an agreement under Section 37 of the *Planning Act* is not required or applicable.

e) *A Block Plan has been prepared in accordance with the Block Plan policies of the OFFICIAL PLAN for the Northdale Neighbourhood Specific Provision Area, where applicable.*

We feel that a block plan is not warranted or useful in this case given that the relatively compact size and shallow depth of the Subject Site which, coupled with prescriptive built form zoning regulations, dictates the built form proposed through the Proposed Development. The Proposed Development complies with the existing zoning requirements related to tower separation and building setbacks, among other provisions which thoroughly regulate the built form.

The compact size and shallow size of the Site, and adjacent properties to the north and south, likewise negates the need for or benefit of additional connections with adjacent properties. Instead, pedestrian activity should be directed to the sidewalk along Hazel Street, which provides direct and convenient connectivity to University Avenue and adjacent properties, as is proposed by the Proposed Development.

f) *Verification through an urban design brief that the LOT and development thereon will conform to: (i.) the OFFICIAL PLAN; (ii.)the REGION'S Official Plan; (iii.) the CITY'S Urban Design Manual in effect, including the Northdale Urban Design Guidelines.*

The Planning and Urban Design Brief summarizes our detailed analysis, which concludes that the Proposed Development is compliant with and conforms to the urban design direction from the City of Waterloo's Official Plan, the Region's Official Plan, and the City's Urban Design Manual. Section 5.0 of the Brief provides a more detailed assessment of how the Proposed Development will implement the applicable urban design policies and guidelines.

g) *Demonstrate compliance with the Provincial D-6 Guideline "Compatibility Between Industrial Facilities and Sensitive Land Uses" where there are potential land use compatibility issues associated with existing and or planned industrial uses operating in proximity to residential or other sensitive land uses.*

Based on our detailed contextual analysis of the area as summarized in the Planning and Urban Design Brief, we have not identified any Class 1, 2 or 3 industrial facilities within the potential influence areas identified by the D-6 Guidelines.

As summarized above, all conditions of the Holding Provision have been satisfied. As such, the Holding Provision should be removed, allowing the Proposed Development to move forward towards final Site Plan Approval.

CONCLUSION

The following materials are enclosed as part of this Holding Provision removal application:

- Architectural Drawing Set – included in Site Plan Application Submission #3
- Functional Servicing and Stormwater Management Report – included in Site Plan Application Submission #3
- Transportation Impact Study – included in Site Plan Application Submission #1
- Planning and Urban Design Brief – included in Site Plan Application Submission #1

We look forward to continuing our collaborative work with City Staff to advance this important mixed-use project. Please contact the undersigned at bsimon@planpart.ca if you have any questions or require any additional information.

Sincerely,

Brandon Simon

Maria Gudova

Brandon Simon, BES, MCIP, RPP, Partner

Maria Gudova, BURPL, Planner

ZONING MATRIX

247-251 Hazel Street – Application to Removal Holding Provision
November 7, 2025

Zone Provision	Zoning Requirement – (H)RN-12, Site Specific Exception C182 or General Provision	Proposed Development	Zoning Compliance
Permitted Uses	• Multi-unit residential building (including apartment building) • Mixed Use building with dwelling units above the first storey	Mixed Use Building with Dwelling units above the first storey	Yes
Minimum Lot Area	1,000 square m^2	1,572.6 m^2	Yes
Minimum Lot Frontage	20 m	44.8 m	Yes
Minimum Street Line Setback (Active Frontage)	1 m	1 m	Yes
Maximum Street Line Setback (Active Frontage)	3 m	1 m	Yes
Minimum Side Yard Setback (Active Frontage)	3 m	North: 3.07 m South: 3.0 m	Yes
Minimum Rear Yard Setback	7.5 m	8.05 m	Yes
Minimum Height of First Storey	4 m	5.85 m	Yes
Minimum Building Height	10.5 m	38.52 m	Yes
Maximum Building Height	41.5 m	38.52 m	Yes
Minimum Podium Height	10.5 m	20.7 m	Yes
Maximum Podium Height	20 m	20.7 m	No – Minor Variance Required
Minimum Building Stepback Above Podium	3 m	No stepback for main residential building entrance and rear building façade Minimum 3 m stepback for all other areas	No – Minor Variance Required to address 2 specific areas
Maximum Tower Footprint above the Eight (8^{th}) Storey	800 m^2	451.9 m^2	Yes
Minimum Tower Separation measured from exterior face of the Building including balconies	a.) 22 m from a Tower on the same Lot b.) 11 metres from the Interior Lot Line	11m	Yes
Maximum Horizontal Tower Dimension	35 m	22.1 m	Yes
Minimum Density	250 Bedrooms per hectare (39 bedrooms based on area of Subject Site)	598 bedrooms per hectare (94 bedrooms)	Yes
Maximum Density	600 Bedrooms per hectare (95 bedrooms based on area of subject site)	598 bedrooms per hectare (94 bedrooms)	Yes
Minimum Number of First Storey Entrances to the Building (Active Frontage)	1 per 25 square metres of Street Line Building Facade	4 First Storey Entrances proposed (~ 30 metres of Building Façade along Hazel Street – requiring ~ 2 entrances)	Yes
Minimum Amenity Area	3 square metres for the first bedroom and 2 square metres for each additional bedroom in the dwelling unit = 282 m^2 required	417.5 m^2	Yes
Minimum Landscaped Open Space	30%	31%	Yes
Minimum Residential Parking Spaces	N/A	8 spaces overall	Yes – none required in MTSA
Minimum Visitor Parking Spaces	N/A		
Minimum Parking Spaces for Non-Residential Uses	N/A		
Minimum Bicycle Parking Rate (Residential)	0.25 per Bedroom (23.5 spaces required)	26 bicycle parking spaces in total	Yes
Minimum Bicycle Parking Rate (Non-Residential)	1 per 100 square metres of Building Floor Area (2 spaces required)	26 bicycle parking spaces in total	Yes

Maximum Number of Driveways per Lot	1	1	Yes
Ancillary Uses	• Ancillary Uses shall not collectively exceed 15% of the BUILDING FLOOR AREA on the LOT or 5,000 square metres, whichever is more restrictive • The maximum BUILDING FLOOR AREA of each RETAIL STORE, CAFÉ, BAKE SHOP or RESTAURANT (including TAKE-OUT RESTAURANT) shall not exceed 465 square metres • Ancillary Uses shall be located on the FIRST STOREY of a MIXED USE BUILDING • Ancillary Uses shall abut the FRONT BUILDING FACADE or FLANKAGE BUILDING FAÇADE	Proposed commercial area: 174.4 m^2 Located at the first storey abutting the front building façade.	Yes
Maximum Number of Main Buildings per Lot	More than 1 permitted	1	Yes
Main Entrance - Location	Main entrance will be at grade on the front building façade or flankage building façade.	Main entrance is located at grade on the front building façade.	Yes
Building Floor Area Regulations for a Lot with Active Frontage	Building Floor Area devoted to: • circulation spaces, such as hallways, elevators, and the like • common indoor AMENITY AREA • entrance / foyers for DWELLING UNITS in storeys above the FIRST STOREY • hydro transformer room • lobby, reception area, seating area, and the like shall not exceed thirty percent (30%) of the entire BUILDING FLOOR AREA of the FIRST STOREY, excluding STRUCTURED PARKING	31%	No – Minor Variance Required
Parking Location	Parking spaces shall be prohibited in the Front Yard and the Flankage Yard	Parking spaces are located at the rear yard, within partially structured parking area	Yes
Structured Parking – Ground Floor	Minimum 25% of First Storey Comprised of Specific Uses	~ 40%	Yes
Structured Parking - Location	Shall be located entirely behind Building Floor Area for Specific Uses	All parking spaces at the rear/behind building	Yes
Structured Parking – Interior Lot	Building Floor Area for Specific Uses shall abut the entire Front Building Facade	Specified uses abut the entire Front Building Facade	Yes
Partially Structured Parking – Building Entrance	Principal BUILDING entrance shall be located on the street line building facade containing the Specific Uses	Principal Building Entrance is located along building façade which faces Hazel Street.	Yes
Driveway Location	A driveway may comprise part of the Front Building Façade or Flankage Building Facade	Driveway entrance located along Hazel Street.	Yes
Holding Symbol Criteria	Holding symbol (H) shall not be removed until the specified criteria are satisfied	Criteria addressed through this enclosed application to remove the Holding provision	Yes – Holding provision to be removed through this application
Amenity Area – Location	Amenity Area is provided on the same lot for which it is required	Amenity Area is located on the subject site	Yes
Minimum Common Amenity Area	Provide a minimum of 30% of the required Amenity Area as Common Amenity Area = 85 m^2	228 m^2	Yes
Parking - Access	Parking spaces have direct or driveway access to a street or lane	Driveway access to Hazel Street	Yes
Parking Space Dimensions – 90˚ when one side abuts a wall or column	Width: 3 metres Length: 5.5 metres	Width: 3 metres Length: 5.5 metres	Yes
Parking – Location	• Parking located on the same lot as the related use, building, or structure • Located behind Front Yard Building Line and the Flankage Yard Building Line • No parking on Landscaped Open Space • Surface Parking in Side Yard to have a minimum width of the side yard of 3 metres	Proposed partially structured surface parking. Located at the rear and under the podium of the building as depicted in Site Plan	Yes

Structured Parking – Exterior View	Structured parking shall be screened from exterior view from the Street and or Lane	The parking area is located at the rear of the building.	Yes
Electric Vehicle Parking	All structured parking shall be Designed Electric Vehicle Parking Spaces	All parking spaces are designed electric vehicle parking spaces	Yes
Minimum Accessible Parking Spaces Required	1 Type A	1 Type A	Yes
Accessible Parking – Minimum Dimensions	Type A Accessible Parking Space Width: 3.7 metres Length: 5.5 metres Accessible Parking Access Aisle Width: 1.5 metres Length: 5.5 metres	Type A Accessible Parking Space Width: 3.7 metres Length: 5.5 metres Accessible Parking Access Aisle Width: 1.5 metres Length: 5.5 metres	Yes
Bicycle Parking - Dimensions	Horizontal (minimum): Width: 0.6 m Length: 2 m (single side rack), 3 m (double side rack) Vertical clearance: 2 m Access Aisle Width: 1.75 m Vertical (minimum): Width: 0.6 m Length: 1.25 m Vertical clearance: 2 m Access Aisle Width: 1.75 m	0.6m x 2.0 m	Yes
Loading Spaces Location	Provided on the same lot as the related Building, Structure or Use	Loading space is located on the subject site	Yes
Loading Space Dimensions	Type A Loading Space Minimum Width: 3 metres Minimum Length: 7 metres Minimum Vertical Clearance: 3 metres	1 Type A Loading Space is proposed Width: 3 metres Length: 7 metres Height: 3 metres	Yes
Minimum Number of Loading Spaces Required for Residential uses	76-900 bedrooms: 1 Type A Space	1 Type A Space provided	Yes
Minimum Number of Loading Spaces Required for Non-Residential Uses	0-249 square metres of Building Floor Area: none required	No specific loading area for the proposed commercial area	Yes
Loading Space - Access	Loading spaces will have access to a driveway, street, or lane with: • a minimum width of three-point-five metres (3.5m); and • a minimum vertical clearance equal to the minimum vertical clearance required for the loading space type	Driveway from Hazel Street measuring 6.1 m in width	Yes