PLANNING JUSTIFICATION REPORT ADDENDUM

PREPARED FOR:

Official Plan and Zoning By-Law Amendment
Forgestone Capital Management Ltd.
170-200 Northfield Drive
570-630 Weber Street North
City of Waterloo

File no. 20397B

April 2025

Your Vision

Designed | Planned | Realized

MHBC - MacNaughton Hermsen Britton Clarkson Planning Limited
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MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

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1.0 Introduction

1.1 Purpose of the Report

McNaughton Hermsen Britton Clarkson Planning Limited (hereinafter "MHBC") has been retained by Forgestone Capital Management Ltd. on behalf of Northfield Equities to assist with the planning applications for their lands at the intersection of Northfield Drive West and Weber Street North. This Report has been prepared as an Addendum to the previously submitted Planning Justification Report and should be read in conjunction with that Report.

In light of the above, the purpose of this Report is to provide a supplemental planning justification for the revised development proposal with respect to the relevant provincial and municipal policy framework applicable to the subject lands, including recent updates to the City of Waterloo Official Plan and Zoning By-law. This Report has been prepared for submission to the City of Waterloo and includes the following:

- A description of the revised development concept and revised proposed Official Plan and Zoning By-law Amendments, with comparisons to the original proposal where appropriate;
- A review and assessment of the existing provincial and municipal policy framework in relation to the revised proposed development, to be read in conjunction with the land use planning analysis as contained in the March 2024 Planning Justification Report; and
- A review of the revised technical reports required for and prepared in support of the revised development proposal.

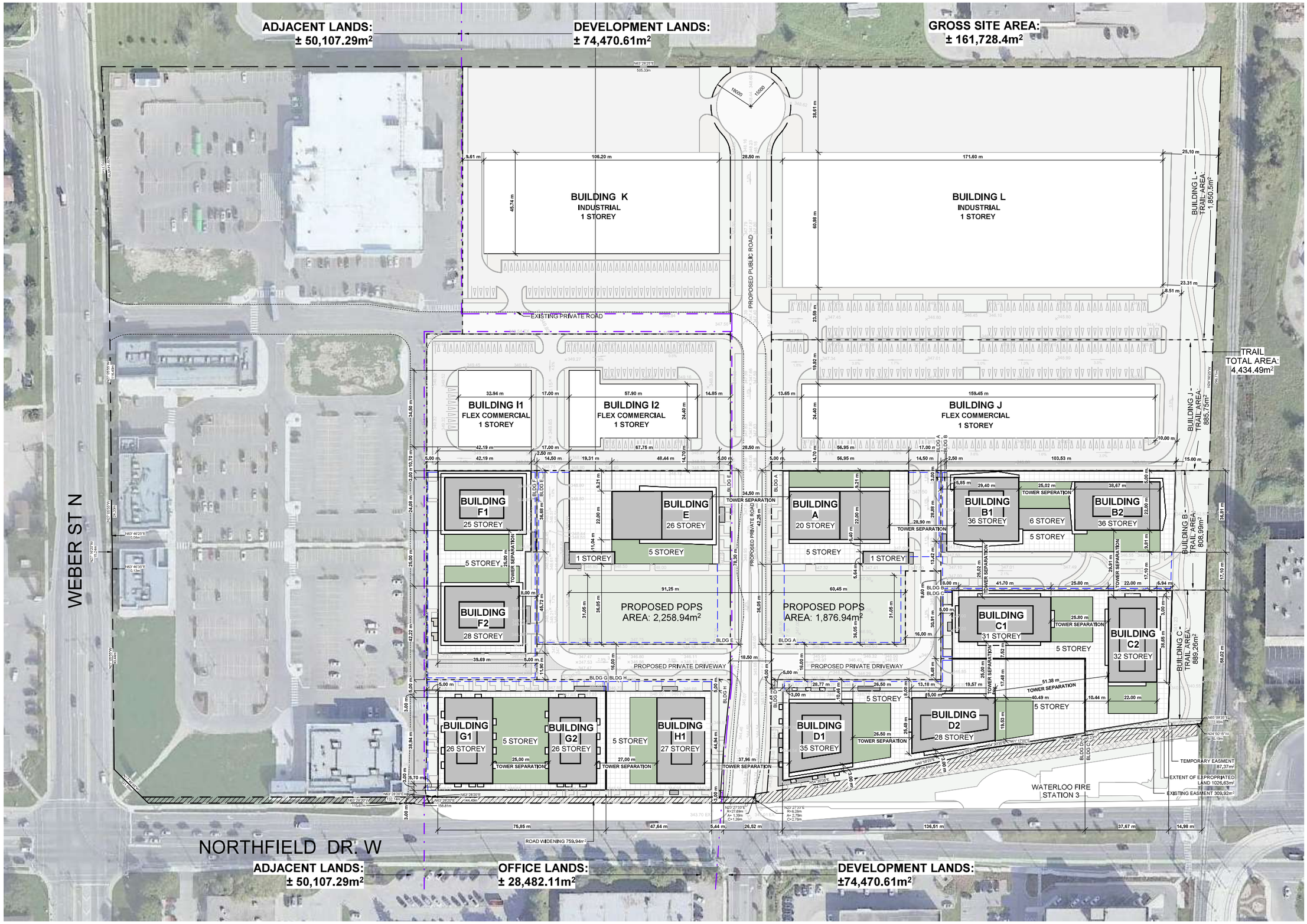
1.2 Revised Development Proposal

The proposed development has been revised in consideration of City and agency comments received regarding the original submission, as well as updates to the City's Official Plan through OPA 58 and corresponding revisions to the City's Zoning By-law approved by Council in December 2024.

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

The following summarizes the main changes to the design, as compared with the site plan advanced with the original application submission:

- The overall number of proposed residential units has decreased from 4,267 to 3,652, representing a decrease in 615 units
- The overall number of bedrooms has correspondingly also decreased from 6,619 to 5,730



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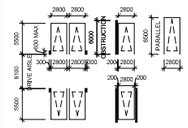
LEGEND

- PRIMARY RESIDENTIAL ENTRANCE
- SECONDARY RESIDENTIAL ENTRANCE
- RETAIL ENTRANCE
- EXIT
- FIRE HYDRANT
- SIAMESE CONNECTION
- PROPERTY BOUNDARY
- BUILDING DELINEATION
- EASMENT DELINEATION
- EXTENT OF UNDERGROUND PARKING BELOW

TYPICAL PARKING DIMENSIONS:

AISLE WIDTH: MIN 6.1m

TYPICAL PARKING SPACE:
MIN 2.8 x 5.5 x 2.0m HIGH



TYPICAL BARRIER FREE SPACE:

TYPE A: MIN 3.7 x 5.5 x 2.1m HIGH
TYPE B: MIN 2.4 x 5.5 x 2.1m HIGH



#	DATE	DESCRIPTION	BY
2	2025-03-04	ISSUED FOR REZONING #2	DRO
1	2024-02-29	ISSUED FOR REZONING	DVI

PROJECT

PROPOSED MIXED-USE DEVELOPMENT

170 Northfield Drive West, Waterloo, Ontario

DRAWING

OVERALL SITE PLAN

PROJECT NO.	22,237P01
PROJECT DATE	2025-02-25
DRAWN BY	DVI
CHECKED BY	RMM
SCALE	1:750

ONTARIO ASSOCIATION OF ARCHITECTS
M. RAZA MEHDI
LICENCE
8452

DRAWING NO. RZ013 | REV. 2

2025-03-04 4:40:01 PM

- The heights of the towers have generally decreased, with heights ranging from 20 storeys to 36 storeys. Only 5 of the 13 towers are more than 30 storeys in height
- The podiums have been reduced in size to 5 storeys
- The proposed park spaces have increased in size from 3,219 square metres to 4,135 square metres
- New pedestrian connections have been included that break up the massing and allow for movement east to west and north to south, including to the linear private park and to the commercial uses that exist on the west side of the site
- The ground floor of all of the buildings now includes more active spaces, including commercial space and amenity/community space

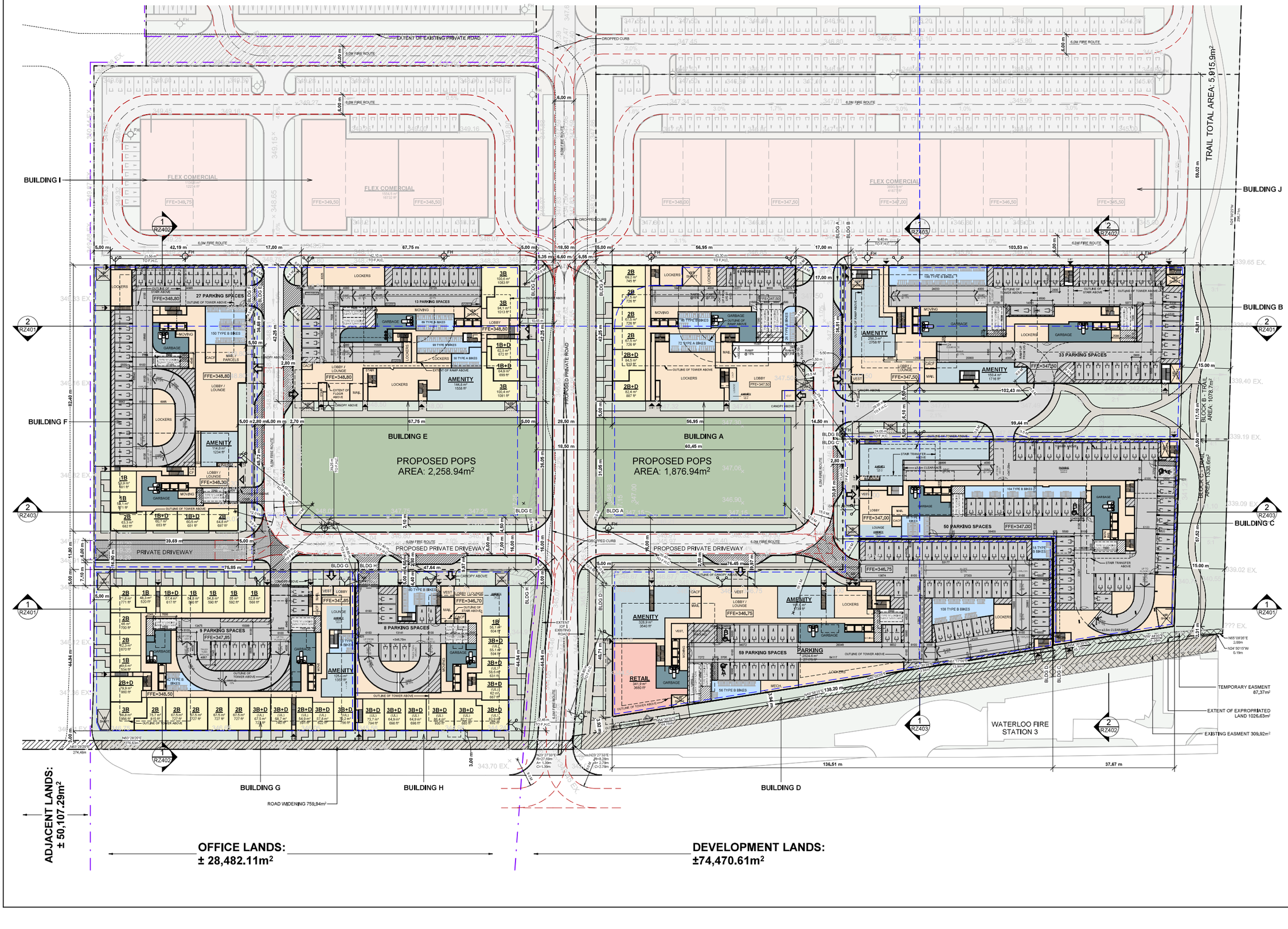
The development still proposes a range of unit sizes, generally captured in the table below. The intent is to provide a full range of housing options, including 3-bedroom family sized units – the breakdown provided below is conceptual and subject to further refinement when site plan applications are advanced.

	Original Proposal		Revised Proposal	
	Total	% of Total Units	Total	% of Total Units
Studio Units	307	8%	302	8%
One Bedroom Units	2068	48%	1553	42%
Two Bedroom Units	1432	34%	1516	42%
Three Bedroom Units	460	10%	281	8%
Total Units	4267	100%	3652	100%

As demonstrated on the First Floor Plan enclosed as **Figure 2**, the ground floor is activated within the podiums of all of the towers, through a combination of residential units, commercial floor space, lobbies and amenity/multi-purpose rooms.

Furthermore, as the Conceptual Site Plan demonstrates, pedestrian and cyclist movement has been enhanced with the following additional connections:

- Connections from the north, to facilitate the movement of employees from the north portion of the site to the park spaces and to the LRT station;
- An easterly connection from the east park space through to the private linear park and public Market Trail. The private linear park provides a north south connection along the entire east side of the development; and
- Expansions to the park spaces to create larger programmable urban park spaces with more defined active transportation routes to the park spaces.



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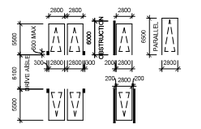
LEGEND

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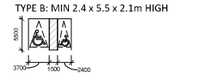
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PROPOSED MIXED-USE DEVELOPMENT

170 Northfield Drive West, Waterloo, Ontario

DRAWING

FLOOR 01

PROJECT NO.	22,237P01
PROJECT DATE	2025-02-25
DRAWN BY	DVI
CHECKED BY	RMM
SCALE	1 : 500

ONTARIO ASSOCIATION OF ARCHITECTS
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LICENCE
8452

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View of the development looking west along Northfield Drive from Highway 85

In summary, the number of residential units has decreased, the height has decreased, while the size of the park spaces has increased and the movement of pedestrians and cyclists around the site has been enhanced.

1.3 Revised Official Plan and Zoning By-Law Amendments

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

1.3.1 City Official Plan Amendment No. 58 (OPA 58)

On December 2, 2024, City Council adopted an amendment to the Official Plan (OPA 58), which constituted the first phase of the City's Official Plan Review. The OPA included revisions to a number of policies and some Schedules, but did not consider all of the policies in the OP or all of the designations on the various Schedules.

For the subject lands, importantly, OPA 58 designates the southerly portion of the lands as 'Station Area Mixed-Use' as illustrated in **Figure 3**. The Station Area Mixed-Use designation is a new land use

designation introduced through OPA 58. The balance of the lands were designated Flexible Industrial. Although based on subsequent discussions with City staff, we understood this was in error and the applicable Schedule will be revised to maintain the Business Employment designation, City staff have since indicated they no longer plan to revise the Schedule and the lands will remain Flexible Industrial.

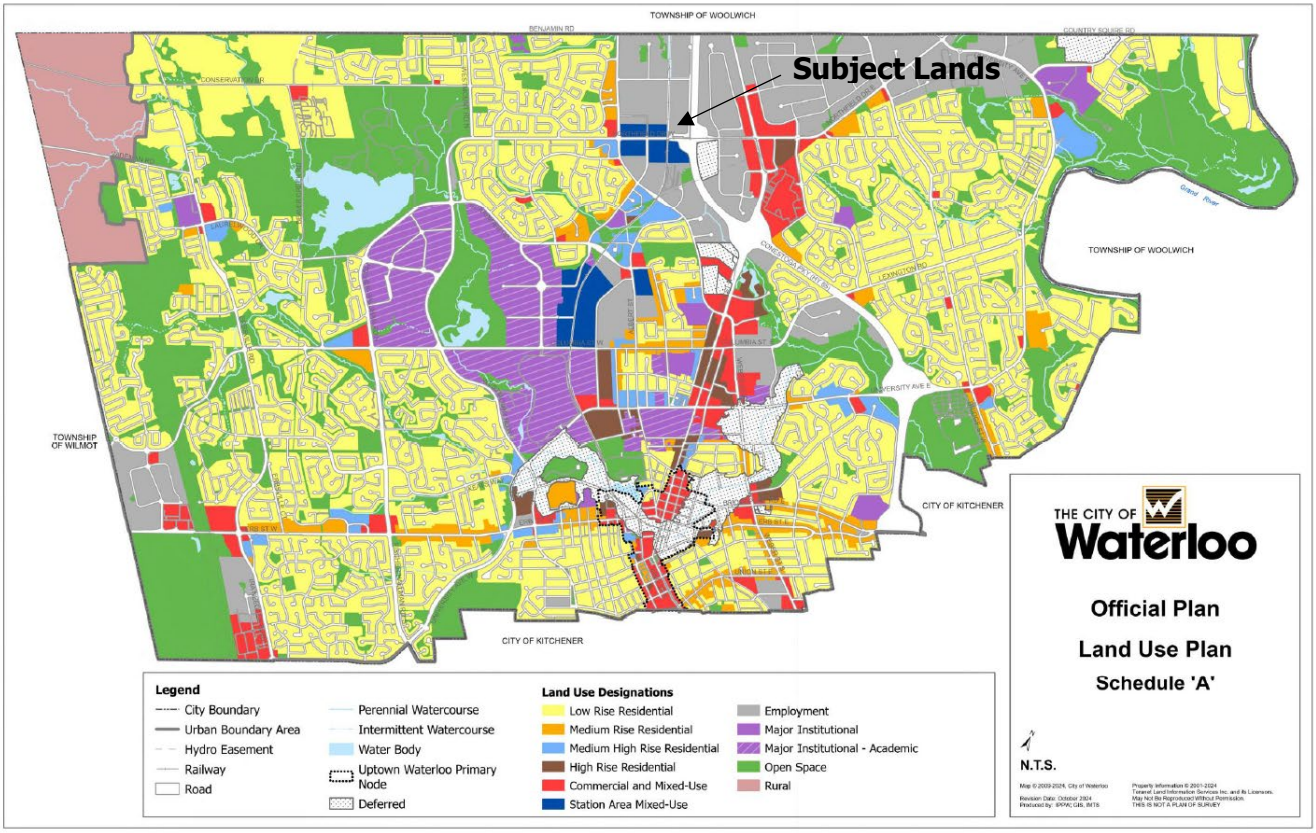


Figure 3 – Schedule A as amended by City OPA 58

In addition to the introduction of the Station Area Mixed-Use designation, OPA 58 removed maximum densities from the Official Plan and modified the permitted height for the subject lands from 81 metres to 30 storeys as illustrated in **Figure 4**. Finally, OPA 58 also repealed the previously approved Specific Provision Area policy (SPA 42) that applied to the lands and both guided and permitted all of the existing development on the lands. As no short to medium term changes are proposed to the office uses on the lands and no long term changes are proposed to the existing commercial uses, the previous Official Plan framework was more suitable. The application submitted to the City prior to OPA 58's adoption by council proposed to maintain the Business Employment designation and SPA 42.

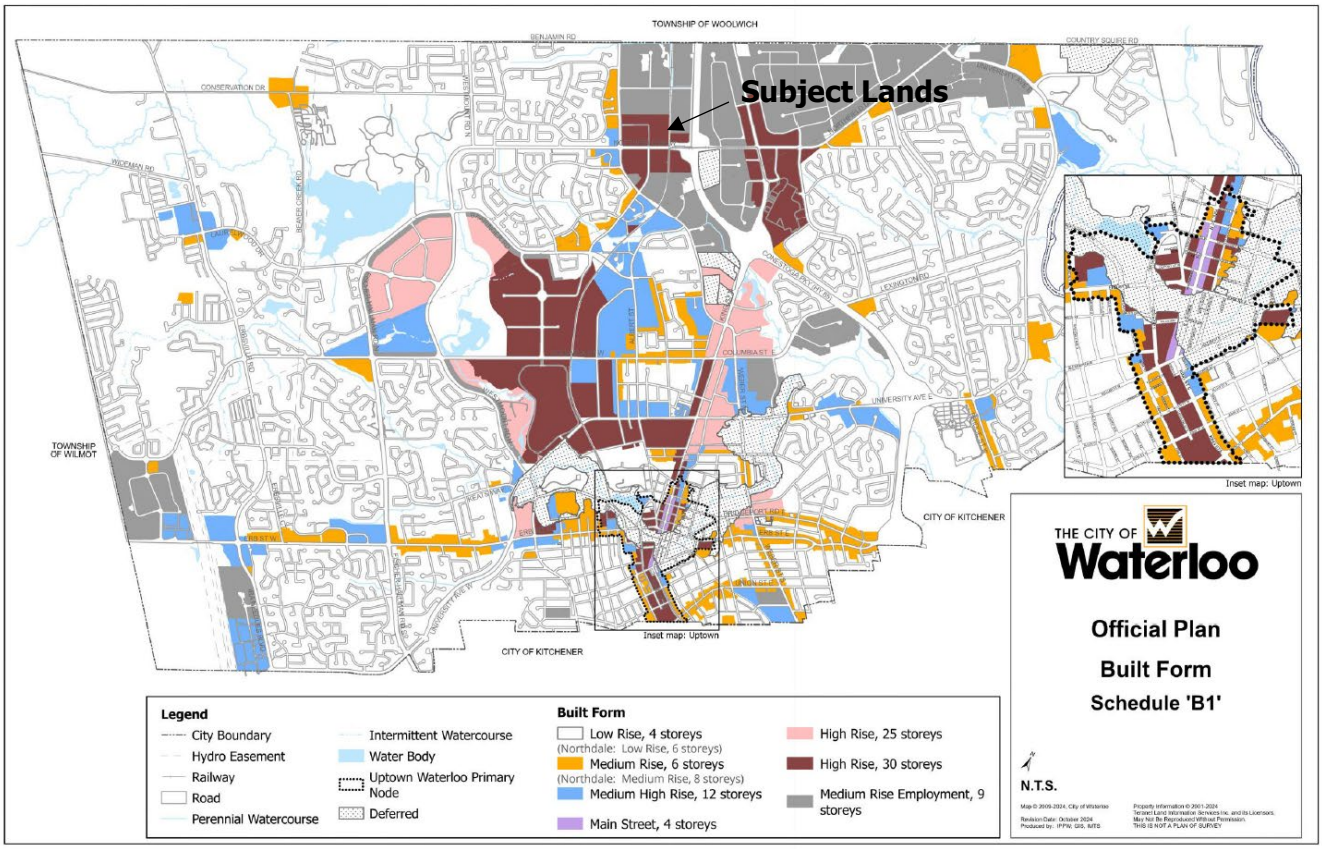


Figure 4 – Schedule B1 as amended by City OPA 58

In anticipation of provincial approval of OPA 58 in spring/summer 2025, we have considered these new designations and related policies as part of the Planning Justification Addendum.

1.3.2 Revised Official Plan Amendment

The Station Area Mixed-Use designation permits the land uses proposed for the portion of the subject lands proposed for that designation through OPA 58. In this regard, a change in designation is not required. Similarly, as the Official Plan no longer includes a maximum density, an amendment to the Official Plan is not required to permit an increase in density.

More specifically, the Station Area Mixed-Use designation permits:

- Multi-unit residential buildings, including apartment buildings
- A range of employment uses; and
- Retail stores, restaurants, banks and commercial services

The intent of the designation is to increase transit ridership, encourage walking and cycling and to make efficient use of the City's infrastructure and services through the development of a mixed-use complete community.

While in our opinion individual developments cannot be a complete community in and of themselves, they can contribute multiple components towards that objective. A complete community includes many elements that would not typically be included in private developments, including protective and emergency services, large recreational facilities and spaces, a full range of housing, institutional uses and a full range of employment uses. Notwithstanding this, the proposed development, including the portion of the lands outside of the Station Area Mixed-Use designation, includes:

- A range of employment uses;
- A range of commercial uses, including a full size food store and full size drug store
- Retail uses and restaurants
- Café
- Two park spaces,
- Trails
- Residential uses, including a range of unit sizes that accommodate family sized households.

Furthermore, the proposed development is planned to:

- Increase transit ridership;
- Encourage walking and cycling; and
- Make efficient use of the City's infrastructure

All of which align with the objectives of the Staton Area Mixed-Use designation.



View of the development looking north along Parkside Drive from Northfield Drive

The policies for the Station Area Mixed-Use designation are located in Section 10.5 of the Official Plan. More specifically, subsection 10.5(11) states that residential uses shall be located above the ground floor, in a multi-storey mixed-use building only, provided further that:

a) Parking required for residential uses shall be provided predominately underground or in a parking structure(s), and structured parking shall not be visible from public view. The implementing Zoning By-law may require structured parking to be located behind building floor area;

b) The Zoning By-law will define performance standards that are specific to residential uses, including but not limited to location, amenity space, density, and parking regulations;

c) Freestanding residential uses may be permitted where it is demonstrated to the satisfaction of the City that the site will contain a mixture of uses (including a meaningful amount of commercial, employment and community uses), and the range of uses collectively will contribute to the Station Area density target and a complete community. Freestanding residential uses shall not adversely impact the planned function of the Station Area Mixed Use designation. Freestanding residential development shall only be considered where lands are of sufficient size to accommodate multiple buildings, including one or more buildings adjacent to the street with a meaningful amount of building floor area devoted primarily to retail, service commercial, office commercial, and/or employment use.

In this regard, all of the proposed parking for the residential uses is planned within parking structures. Furthermore, the policies would permit standalone residential buildings, as the lands have a significant amount of existing commercial development, as well as a significant amount of planned employment uses. Subsection 10.5(12) requires that for large developments such as the one proposed for the subject lands, 2 square metres of commercial/employment and/or community uses shall be provided per unit. As the subject lands propose 3,652 units, a total of 7,304 square metres of non-residential space is required. The proposed development will exceed this requirement.

In this regard, in our opinion, the Station Area Mixed-Use designation permits the development as proposed. However, as noted earlier, five of the buildings are proposed to be greater than 30 storeys. As Schedule B1 permits a maximum height of 30 storeys for the subject lands, an amendment to the Official Plan is required to permit:

- a maximum height of 36 storeys for a maximum of three buildings;
- a maximum height of 32 storeys for a maximum of two buildings; and
- a maximum height of 30 storeys for all other buildings.

This minor increase in height allows for variation in built form and to establish a visually appealing skyline. The tallest buildings, at 35 and 36 storeys are planned for the entry point into the site at Northfield Drive West and Parkside Drive and at the interface with the planned employment uses. This placement signals not only an entry into the site but also establishes a visual cue from the east and west along the Northfield corridor. Locating the other taller buildings further north into the site creates physical separation between the taller buildings, allowing for variety in height, design and visual interest. A high standard of design is planned to help establish the design expectations of the Station Area. Two other buildings, at 31 and 32 storeys are located close to the Market Trail, to provide a north-south

view along the active transportation corridor. The proposed height increases are minor and will not impact adjacent lands, all of which are employment uses further to the east and north.

The proposed Official Plan Amendment is illustrated in **Figure 5**.

Flexible Industrial

As noted above, OPA 58 designated the balance of the lands Flexible Industrial, whereas they were previously designated Business Employment. OPA 58 also repealed the previous Specific Provision Area 42 (SPA 42) that applied to the lands and that guided the overall development of the lands. The SPA effectively permitted the existing uses on the lands (food store, drug store, office, restaurants, etc.) with a series of policies that regulated the build out of the lands. With the change in designation and repeal of the SPA, those policies and permissions are no longer in place. Notwithstanding OPA 58 and Council's repeal of SPA 42, the application was advanced well before staff recommended these changes and staff was also aware of the long term plans to retain all of the existing commercial uses on the site, and the medium term intention to retain the existing office buildings.

In recognition that there were many properties in the City that had existing long-term uses that would continue on lands designated Flexible Industrial (through OPA 58), a new policy was added (10.3.2(11)), which states as follows:

> Existing uses in the Flexible Industrial designation that do not conform with the definition of 'employment area' in the Planning Act shall be permitted where the use has been lawfully established on the parcel of land before October 20, 2024.

Through the previous SPA and the implementing site specific zoning (C117), the lands were 'lawfully' permitted a wide range of employment and commercial uses, including:

- ADVANCED TECH including life sciences such as oceanography, geology, botany, agriculture, fisheries, forestry, and other allied subjects
- BUSINESS INCUBATOR
- COMMUNICATION PRODUCTION
- DATA CENTRE
- GOVERNMENT USE including a PARKING FACILITY
- LIGHT INDUSTRIAL ASSEMBLY related to ADVANCED TECH, including appliances
- LIGHT INDUSTRIAL MANUFACTURING related to ADVANCED TECH, including appliances
- LIGHT INDUSTRIAL PROCESSING related to ADVANCED TECH, including appliances
- MAJOR OFFICE
- MEDICAL CLINIC
- OFFICE
- PRINTING ESTABLISHMENT
- STRUCTURED PARKING
- TECH OFFICE
- TRAINING FACILITY related to ADVANCED TECH

Further to these uses, a range of ancillary uses were also permitted, including:

- CHILD CARE CENTRE
- Beer, Liquor & Wine Store

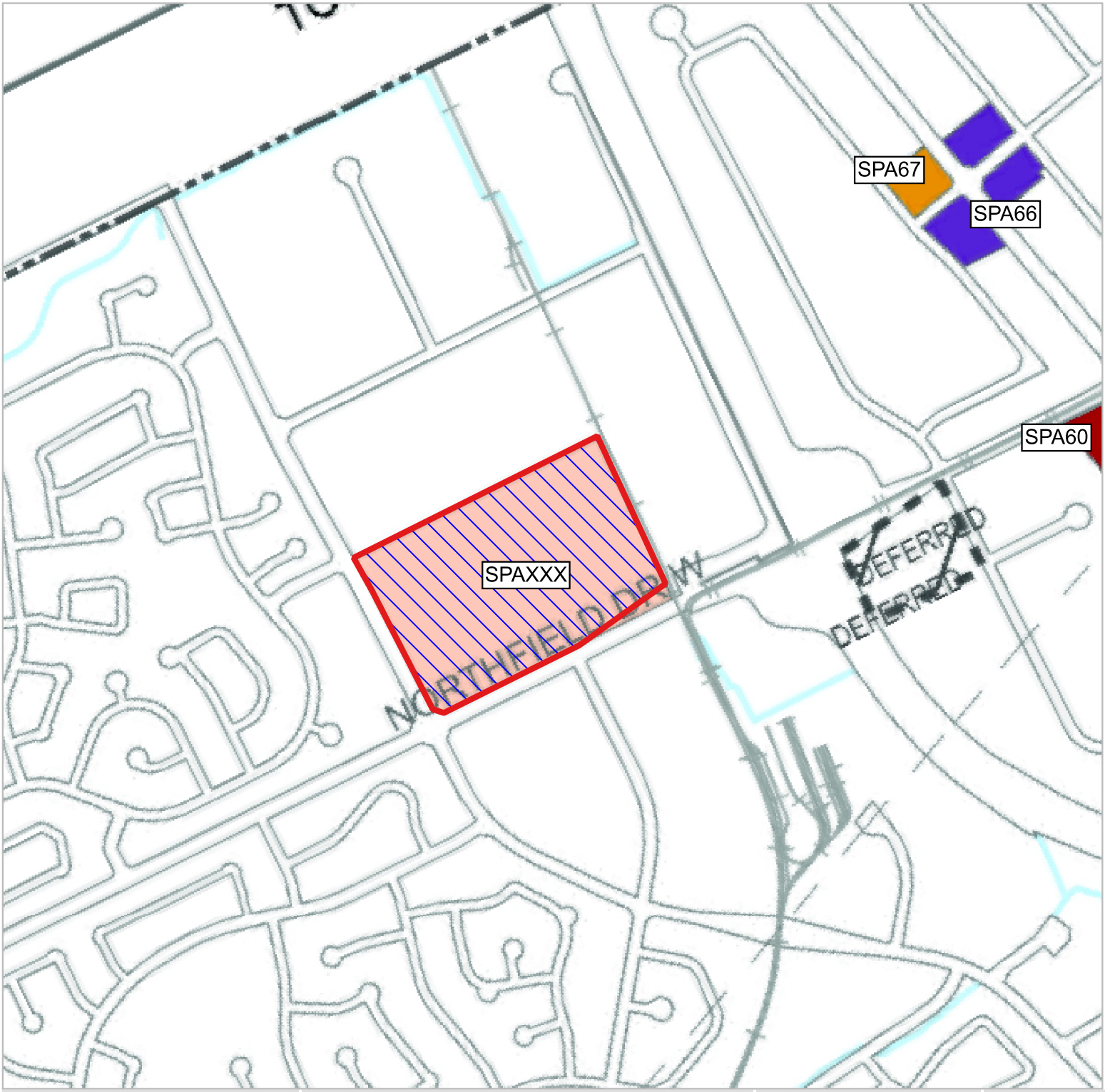


Figure 5
Proposed Official Plan Amendment - Specific Provision Areas

170-190 Northfield Dr. W
City of Waterloo
Region of Waterloo

LEGEND

- Subject Lands
- Lands to be designated ASPXXX
- SPA — Specific Provision Area
- SPA — Expired Specific Provision Area

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north

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- CAFE
- DRUG STORE
- FOOD STORE
- RESTAURANT
- RETAIL STORE (including hardware store, but excluding Department Stores and Automotive Supply Stores)
- TAKE-OUT RESTAURANT
- COMMERCIAL RECREATION (Indoor)
- COMMERCIAL SCHOOL
- COMMERCIAL WELLNESS
- FINANCIAL SERVICES
- PERSONAL SERVICES SHOP
- VETERINARY CLINICE
- HOTEL

As all of these uses were lawfully established through a previous SPA and site-specific zoning, we interpret Policy 10.3.2(11) to continue to permit those uses, even if each one was not specifically tenanted on or before October 20, 2024.

In this regard, the uses permitted previously on the lands, as well as the uses permitted through the Flexible Industrial designation constitute the permitted land uses on the portion of the lands outside of the Station Area Mixed-Use designation. As such, as no additional uses are proposed, no amendment to the Official Plan is required in this regard.

1.3.3 Revised Zoning By-Law Amendment

In addition to the introduction of the Station Area Mixed-Use designation through OPA 58, the City has established a new implementing zone 'Station Area Mixed-Use' or 'SAMU'. Council approved the creation of this new zone in December 2024 and it will be applied to multiple properties within the Northfield Station Area including lands on the opposite side of Northfield Drive West once the province approves OPA 58.

The SAMU zone is intended to implement the Station Area Mixed-Use designation and permits a wide range of land uses, including a range of employment uses, commercial uses and residential uses.

Although the regulations in the SAMU zone would generally permit the proposed development, the following site-specific regulations will be required:

- Increase in the maximum permitted height for two buildings to exceed 30 storeys, up to 32 storeys and for three additional buildings to exceed 30 storeys up to 36 storeys,
- Increase in the maximum permitted density from 900 bedrooms per hectare to 1,300 bedrooms per hectare
- Reduction in the minimum required Street Line Setback (Northfield Drive) from 4 metres to 3 metres (after the road widening conveyance)

- Reduction in the minimum tower separation for the westerly interior lot line (future lot line) from 11 metres to 8 metres (no change from previous request)
- Reduction in the side yard setback adjacent to the Market Trail expropriation lands from 3 m to 0 m (no change from previous request)
- Reduction in the minimum tower separation requirement from the Market Trail expropriation lands from 11 metres to 5 metres (no change from previous request)
- Exempt the lands from Section 3.S.5 of By-law 2018-050 (Split Zoning) – no change from previous request
- Permission for three towers (A, C and E) to have a maximum horizontal tower dimension of 45 metres – no change from previous request

As noted above, many of the site specific requests are unchanged from the original application submission (other than reference to the SAMU zone). Where no change is proposed, the analysis contained in the original Planning Justification Report and the Response Matrix included with the resubmission should be referenced.

The revised Zoning By-law Amendment is illustrated in **Figure 6**.

As noted above, the lands are subject to existing site specific zoning C117, which has guided the development and build out of the developed portion of the lands, including all of the existing buildings and uses, some of which were constructed in 2025. In consideration of the existing development on the lands and the City's change in land use from Business Employment to Station Area Mixed Use and Flexible Industrial, it is important to retain many elements of the existing site specific zoning to regulate the existing development and allow those buildings to continue to operate. In this regard, for the portion of the lands outside of the SAMU zone, the original Zoning By-law Amendment advanced prior to the adoption of OPA 58 is not proposed to be changed, as summarized below:

- Retain the permitted uses established by C117 for the westerly portion of the lands, which are already developed with a range of commercial uses, including a full size food store and full size drug store;
- Continue to permit the uses established through C117 on the balance of the lands (e.g. office, medical clinic, advanced tech, beer liquor wine store, and a range of ancillary commercial uses, where they are not also already permitted in the E3 zone);
- Permit a combined maximum of 3,716 square metres of ancillary commercial uses on the lands zoned E3 (within future Buildings I and J);
- Limit ancillary commercial uses to 40% of the building floor area for Buildings I and J (excluding structured parking).

In consideration of the City adopted OPA 58 and in recognition of the policy 10.3.2(11), which permits all of the uses established through SPA 42 and C117, the lands are proposed to be zoned E3-81 to implement OPA 58, with the site specific provisions noted above.

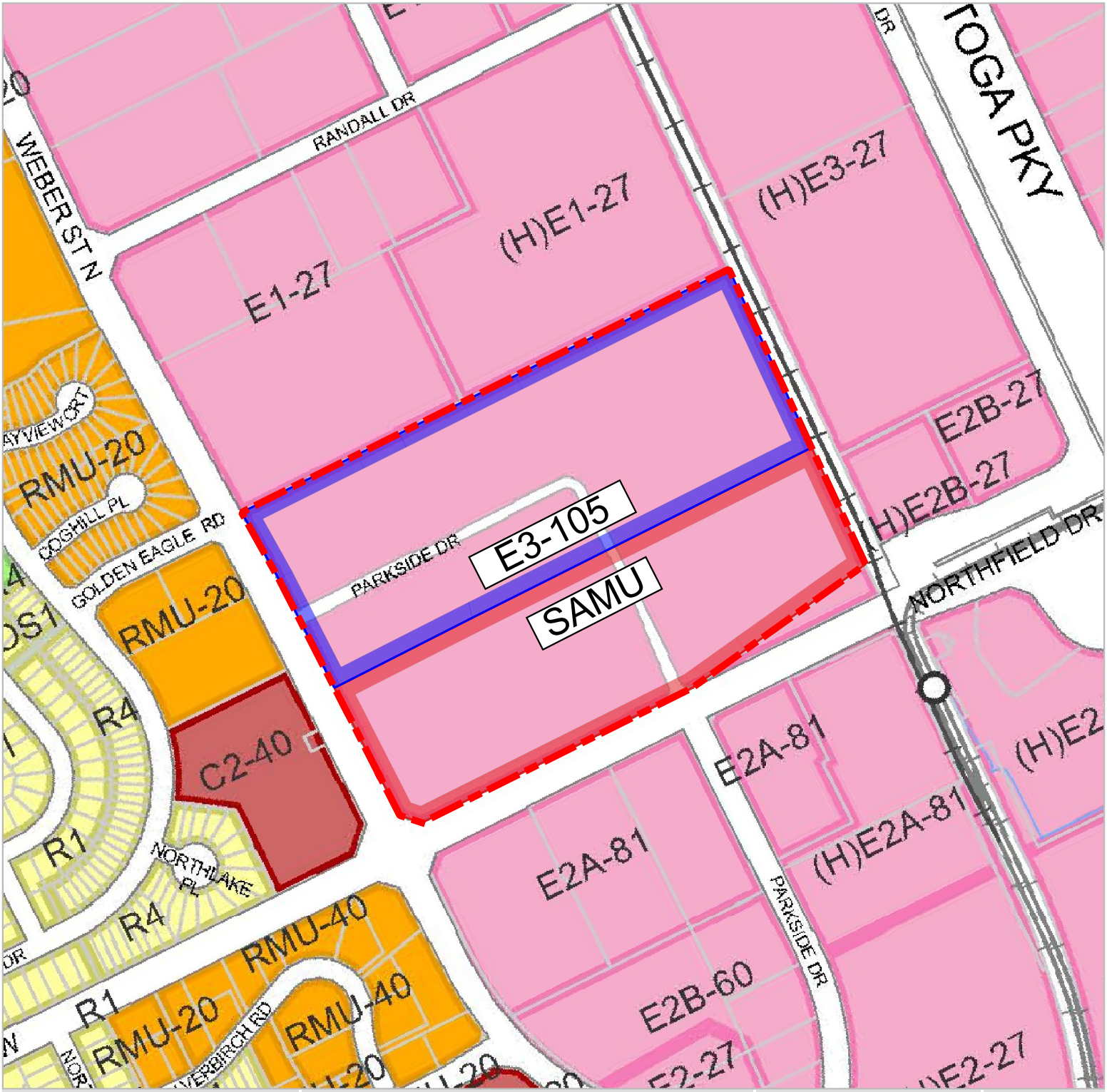


Figure 6
Proposed Zoning Bylaw Amendment

LEGEND

- Subject Lands
- Flexible Industrial with site specific provisions (E3-105 with CXXX)
- Station Area Mixed-Use with site specific provisions (SAMU with CXXX)

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north

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170-190 Northfield Dr. W
City of Waterloo
Region of Waterloo

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2.0 Analysis

The revised development proposal continues to conform to the Region of Waterloo Official Plan (including ROPA 6). The development more closely aligns with the City of Waterloo Official Plan as amended by OPA 58 – the only proposed amendment to the Official Plan, as discussed above, is to permit a maximum of five of the thirteen buildings to exceed the maximum permitted height of 30 storeys.

Since the submission of the original OPA/ZBA application in April 2024, the Province has approved the Provincial Planning Statement, 2024 and repealed both the Growth Plan for the Greater Golden Horseshoe and Provincial Policy Statement. Furthermore, the City of Waterloo has adopted an Official Plan Amendment that implements the first phase of the ongoing Official Plan Review (OPA 58) and proposed new Inclusionary Zoning regulations; both of which impact the subject lands. Furthermore, the City introduced a new zone to implement the Station Area Mixed-Use designation. The following sections of this Report review the Provincial Planning Statement, 2024 as it applies to the subject lands and how the revised proposal is consistent with the PPS, as well as provides a supplemental analysis of the City of Waterloo Official Plan framework as it applies to the revised development proposal, and in particular, the Station Area Mixed-Use designation.

2.1 Provincial Planning Statement, 2024

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

Settlement Areas and Housing

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

a) efficiently use land and resources;

b) optimize existing and planned infrastructure and public service facilities;

c) support active transportation;

d) are transit supportive, as appropriate; and

e) are freight-supportive.

The revised development proposal continues to represent an efficient use of land and existing infrastructure, including municipal infrastructure that already serves the site and its buildings. The proposed development will facilitate residential and employment growth in proximity to rapid transit and existing active transportation routes, including the Northfield Station platform and the Market Trail, both in immediate proximity. The development will activate the Parkside Drive private road extension with commercial, residential, open space and employment uses, while facilitating pedestrian and cyclist movement through the site to the signalized crossings on Northfield Drive that provide access to the station platform.

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

a) Establishing and implementing minimum targets for the provision of affordable housing;

b) Permitting and facilitating all housing options and all types of residential intensification, including new housing options within previously developed areas and redevelopment which results in a net increase in residential units;

c) Promoting densities which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) Requiring transit-supportive development and prioritizing intensification in proximity to transit.

The proposed development plans for a range of housing sizes, including larger family sized units in proximity to transit, jobs and shopping, allowing for a car free lifestyle. Furthermore, the development will be subject to the City's inclusionary zoning regulations that require affordable housing (we understand these regulations are to take effect on January 1, 2026). Overall, the proposed development is of a density that will support the use of rapid transit and existing active transportation infrastructure, accommodate opportunities to improve existing active transportation infrastructure through a road widening conveyance, and represents one of the few opportunities for significant redevelopment with residential uses in the Northfield Station Area. We also note that lands were previously taken from the subject lands to facilitate an extension of the Market Trail through to Northfeld Drive at Parkside Drive.

Strategic Growth Areas and Major Transit Station Areas

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

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 to support the achievement of complete communities and compact built form; and consider a student housing strategy.

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

a) connections to local and regional transit services; and

b) infrastructure that accommodates a range of mobility needs and supports active transportation.

The revised development reduces the proposed height of the buildings, while maintaining variation for an interesting skyline. Revisions were also advanced to improve active transportation movement around the site and to create more links to the existing and planned commercial and employment uses. The development contributes to a complete community through the inclusion of employment, commercial, residential and open space uses, all within the same overall development. All of the planned uses are within walking distance of each other, as well as other surrounding employment uses, active transportation networks and the Northfield ION station platform.

In our opinion the proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the policies of the PPS.

2.2 City of Waterloo Official Plan

Since the filing of the original OPA/ZBA application, the City of Waterloo has adopted a general amendment to their Official Plan (OPA 58), which formed Phase One of their ongoing Official Plan Review. While OPA 58 requires final approval by the Ministry of Municipal Affairs and Housing and is therefore not yet in force and effect, we have reviewed the application against those policies in anticipation of the provinces' approval in spring/summer 2025.

Through OPA 58, the southerly portion of the subject lands were designated Station Area Mixed-Use and 30 Storeys on Schedules A and B1 respectively (the entire property was designated for 30 Storeys). As discussed earlier, the proposed development aligns with the policies and the overall objective of the Station Area Mixed-Use designation and no amendments thereto are required. Schedule B1 permits buildings with a maximum height of 30 storeys on the lands. Also as discussed earlier, only five (5) of the thirteen (13) proposed buildings exceed this height and most are well below 30 storeys. In our opinion, permission for five buildings, on the east side of the site to exceed 30 storeys (up to 32 and 36 storeys) is appropriate and allows for a variation in height on the site to create an interesting skyline.

As previously discussed, the development aligns with the Station Area Mixed-Use designation. An amendment to the Official Plan is only required to permit the building heights noted above. We previously noted the Flexible Industrial designation that applies to the balance of the lands and the related policy that permits established uses. As both SPA 42 and C117 permitted a range of uses, the policy would recognize those lawfully established uses and continue to permit them on the lands outside of the boundary of the proposed SAMU zone.



View of the development looking south towards Northfield Drive

In our opinion, the proposed development is consistent with the policies and objectives of the Station Area Mixed Use designation and more broadly, the policies for Major Transit Station Areas. No changes to the permitted uses for the balance of the lands are proposed – the OPA proposes to continue to permit the uses previously established through SPA 42 and C117 while incorporating them into the Flexible Industrial zone with site specific provisions.

2.3 City of Waterloo Zoning By-law

The original application proposed the Residential Mixed Use 81 (RMU-81) zone for the southerly portion of the lands, with the balance of the lands retaining the Station Area Business Employment zone, with a minor modification to exception C117.

As discussed earlier, the City has established a new zone, Station Area Mixed Use (SAMU) and has applied that zone to a number of properties within the Northfield Station Area (subject to formal approval of OPA 58), including lands immediately to the south of the subject lands. In this regard, and to implement the Station Area Mixed Use land use designation, the revised Zoning Bylaw Amendment proposes to zone a portion of the lands Station Area Mixed Use (SAMU), with site specific provisions.

2.3.1 Zoning By-law Amendment

The proposed Zoning By-law Amendment implements the proposed Official Plan Amendment and establishes site-specific regulations to facilitate the revised development as proposed – amending the Station Area Mixed-Use (SAMU) zone. The following site-specific provisions are required for the portion of the lands proposed to be zoned SAMU:

- Increase in the maximum permitted height for three buildings to exceed 30 storeys, up to 36 storeys
- Increase in the maximum permitted height for two additional buildings to exceed 30 storeys, up to 32 storeys

- Increase in the maximum permitted density from 900 bedrooms per hectare to 1,300 bedrooms per hectare, calculated using the lands proposed to be zoned SAMU
- Reduction in the minimum required Street Line Setback (Northfield Drive) from 4 metres to 3 metres (after the road widening conveyance)
- Reduction in the minimum tower separation for the westerly interior lot line (future lot line) from 11 metres to 8 metres (**no change from previous request**)
- Reduction in the side yard setback adjacent to the Market Trail expropriation lands from 3 m to 0 m (**no change from previous request**)
- Reduction in the minimum tower separation requirement from the Market Trail expropriation lands from 11 metres to 5 metres (**no change from previous request**)
- Exempt the lands from Section 3.S.5 of By-law 2018-050 (Split Zoning) – **no change from previous request**
- Permission for three towers (A, C and E) to have a maximum horizontal tower dimension of 45 metres (**no change from previous request**)
- The SAMU zone refers to 'Active Uses' with reference to a requirement that building with an 'active frontage' as identified on a separate schedule, contain one or more of a list of commercial uses on the ground floor facing a street. In this case, only Buildings G and H face a street - Northfield Drive. Residential uses are proposed on the ground floor, rather than one of the list of commercial uses in the By-law.

Some of the site-specific relief requested remains unchanged from the original application submission. For those site-specific requests, the Planning Justification Report and Response Matrix should be referenced. The following provides justification for the new site-specific regulations accounting for the new regulations applicable within the SAMU zone.

Height and Density

The heights of the buildings and the proposed density have decreased compared with the original application submission. As discussed, 8 of the 13 towers conform to the Official Plan. In this regard, the Zoning By-law Amendment seeks to implement the Official Plan by permitting 30 storeys on the lands, with a site-specific exception to allow 3 buildings to exceed 30 storeys, up to a maximum height of 36 storeys and two additional buildings up to 32 storeys. Justification was provided above for the Official Plan Amendment.

The proposed density has also decreased from 1,600 beds/ha to 1,300 beds/ha, while maintaining the broad range of housing (one, two and three-bedroom units). In our opinion, the density is appropriate for the lands:

- The development will support the ION transit (and other GRT routes),
- The development is located adjacent to an active transportation trail, and was subject to a separate expropriation process to expand the trail,

- The development includes a mix of unit sizes in a podium and tower built form, consistent with the Zoning regulations,
- The broader development includes employment and commercial uses, with supporting open space uses that will allow future residents to live, work and play within the same development, and
- The development's built form requires minimal relief from standard by-law regulations

Northfield Setback

The SAMU zone requires a minimum 4 metre setback from the Street Line, which in this case is the Northfield Drive frontage. The existing development along Northfield Drive is permitted a 3 metre setback. Multiple buildings have been developed along this street frontage at that setback, including a building only recently constructed.

The proposed site-specific provision to permit a 3 metre setback is consistent with the existing condition – however the new buildings will be set back 3 metres further than the existing buildings as a result of the road widening conveyance. The podiums along Northfield, which include residential units, will activate the street in a positive manner, with a more direct relationship than some of the existing commercial buildings, whose entrances are internal to the site. The setback, combined with the 3 metre road widening conveyance allows for a wide space between the sidewalk and face of the podium for landscaping – in this case 6 metres, or double what exists today on the western portion of the site.

In the current condition, west of Parkside Drive, Northfield Drive includes 4 travel lanes, with cycling lanes on both sides of the street, sidewalks on both sides of the street and large landscaped boulevards between the sidewalk and traveled portion of the road. Even with the minor reduction from 4 metres to 3 metres, there remains ample space for landscaping and physical separation from the sidewalk. This is further enhanced through the 3 metre road widening conveyance.

New SAMU specific regulations

Regulation	Requirement	Compliance
Lot Frontage	20.0 metres	Complies
Street Line setback (min)	4.0 metres	3 metres (Northfield Drive) – post widening
Street Line setback (max)	75% of the Street Line Building Façade shall be within 6.0 metres of the Street Line	Complies
Side Yard setback (min)	3.0 metres	Complies except for setback adjacent to Market Trail expropriated lands – 0.0 m along that interface
Rear Yard setback (min)	3.0 metres	Complies
Non-Residential Uses (min)	For LOTS with more than 1,000 DWELLING UNITS, the minimum BUILDING FLOOR AREA for non-residential uses in 9S.3.1, excluding	Complies The subject lands propose 3,652 units, which would require 7,304 square metres of non-residential uses.

	STRUCTURED PARKING, shall be 2.0 square metres per DWELLING UNIT, and 1.0 square metre per DWELLING UNIT in all other instances	The lands include more the 7,304 square metres of non-residential uses, which will be further augmented by the proposed development
Density (max)	900 bedrooms per hectare	1,300 bedrooms per hectare
Height of First Storey (min)	4.0 metres	Complies
Building Height (min)	10.5 metres and 3 storeys	Complies
Building Height (max)	105 metres and 30 storeys	36 storeys for a maximum of three towers 32 storeys for a maximum of two towers 30 storeys for all other buildings
Podium Height (max)	27 metres and 6 storeys	Complies
Tower Separation (min)	22 metres from a Tower on the same Lot 11 metres from an interior lot line	Towers F1, F2 and G1 are proposed at 8 metres from the future westerly lot line adjacent to the existing commercial development – the buildings are adjacent to a 6.1 m wide driveway that provides access to the commercial development All other setbacks are met
Horizontal Tower Dimension (max)	40 metres	All towers comply except for: Tower A – 45.5 m Tower C1 – 42.5 m Tower E – 45.5 m
Tower Footprint (max)	1,000 square metres	Complies
Tower Stepback above Podium (min)	3.0 metres	Complies
Common Outdoor Area	For LOTS with an area of 2,000 square metres or more, three percent (3%) of the LOT AREA shall be COMMON OUTDOOR AREA located at GRADE	Complies
Landscaped Open Space (min)	15%	Complies
Amenity Areas (min)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT	Complies

Ground Floor in Buildings G and H

As described above, the SAMU zone includes requirements related to Active Frontage and Active Uses. The intent is to require commercial uses, from a prescribed list, on the ground floor facing a public street. As discussed previously, the development includes a range of commercial uses on the westerly portion of the site, including multiple commercial buildings oriented to Northfield Drive.

Buildings G and H also abut Northfield Drive. Due to the significant grade change from the street heading north into the site, portions of each building are 'at grade' facing Northfield Drive, but not the whole façade. Given the extensive existing commercial uses on the site as well as the planned commercial uses at the corner of Northfield Drive and Parkside Drive (where there is a signalized crossing and a higher expected pedestrian count), residential uses are planned on the ground floor. Taking the grade change into account, many of the units are designed with direct pedestrian links and entrances to the sidewalk along Northfield Drive. In this regard, the street will be activated and these planned family sized units will have direct access to the sidewalk and the signalized crossing to the ION Station.

Holding Provisions in SAMU Zone

The SAMU zone includes a number of Holding provisions intended to apply to a number of properties that were 'pre' zoned SAMU through the City's initiated By-law Amendment. Those Holding provisions include:

a) Approval of a comprehensive Master Plan for the lands;
    a. The City has a detailed Conceptual Site Plan for the lands, which also includes floor plans
    b. The City has a Pedestrian Wind Assessment
    c. The City has a Shadow Study

b) Approval of a comprehensive Master Servicing Plan and verification of sufficient servicing capacity;
    a. The City has detailed servicing plans for the lands as well as a Report that confirms capacity is available

c) Approval of detailed site specific Urban Design Guidelines for the lands;
    a. Urban Design Guidelines were submitted to the City and can be updated, as required, through future site plan applications

d) Approval of a Parkland Assessment and conceptual design for open spaces
    a. The proposed park spaces do not require a Parkland Assessment – the park spaces are intended as local urban parks serving the immediate area. If the City feels a Parkland Assessment needs to be undertaken for north Waterloo, that should be done by the City
    b. A landscape plan for the park spaces can be provided through future site plan submissions
    c. The surrounding area is comprised of separated industrial and commercial uses. It is expected that the park space within the development would be utilized by the occupants and users of the site and development.

e) Provision of a Sustainability Strategy
    a. A detailed Energy Study Report was previously submitted.

f) Verification of sufficient transportation capacity and transportation infrastructure
    a. A Transportation Impact Study (TIS) was previously submitted. Additional information and responses to comments are included with this submission, as well as an updated TIS.

g) Provision of a Noise Study
    a. A Noise Study was previously submitted. Additional information and responses to comments are included with this submission

As such, in our opinion, the Holding provisions included in the SAMU zone are not required.





Conceptual images of the central POPS.

Lands outside of the proposed SAMU zone

The Planning Justification Report submitted with the application outlined the proposed amendments to the balance of the lands, which are zoned E2B-81 and C117. The zoning of the balance of the lands has been complicated by the City's adoption of a land use designation that does not permit the existing uses and the repealing of SPA 42, which guided the overall development of the lands. In this regard, the southerly portion of the lands that contain existing commercial uses (e.g. State and Main restaurant, Shoppers Drug Mart) would be zoned SAMU to implement OPA 58. The balance of the lands, which were designated Flexible Industrial through OPA 58, would be zoned Flexible Industrial (E3).

The SAMU zone permits the uses that already exist on the lands. In this regard, no change to the zone is required to continue to permit the existing commercial uses. However, some of the existing uses are located outside of the boundary of the Station Area Mixed-Use designation and SAMU zone boundary. Those uses, which include retail, restaurant, office and food store uses, are not permitted in the Flexible Industrial (E3) zone. As discussed above, the original SPA 42 and C117 zone permitted the uses. In accordance with OP policy 10.3.2(11) those uses should still be permitted. In this regard, the intent of the ZBA for the portion of the site outside the SAMU zone is to:

- Continue to permit all of the uses previously permitted on the lands, through C117, allowing for the continued operation of the existing buildings (e.g. tenant changes, renovations to buildings, etc.)
- Implement the Flexible Industrial zone to align with the City's adoption of OPA 58 (some of the uses permitted through C117 overlap with uses permitted in the E3 zone)
- Permit the ancillary commercial uses noted above, within the proposed Buildings I and J, with a limitation of 40% of the building floor area.

3.0 Summary of Revised Technical Studies

To support the revised development proposal, a number of technical studies and reports included in the original OPA/ZBA submission were updated to evaluate the revised development proposal with respect to site servicing, stormwater management and noise. The following provides a summary of these revised technical studies.

Functional Site Servicing Report

Counterpoint Engineering has prepared a revised Functional Servicing Report and plans that demonstrate how the development will be serviced after the easterly portion of the lands are developed and the lands are severed into three parcels in accordance with the severance application filed separately. In the medium term, no changes are proposed to the existing office buildings – they will remain on the lands. The westerly portion of the lands are planned to remain in the long term and no changes to those buildings are proposed either. The easterly vacant lands can be serviced via the private Parkside Road, with a direct connection to the public infrastructure on Northfield Drive. Please refer to the revised Report and the responses from Counterpoint in the Response Matrix. The FSR would be updated once the 'Severed Lands' (the central portion of the site) are proposed for development. A Holding provision can be applied to this portion of the site to require an updated FSR when redevelopment of the lands is proposed.

Transportation Impact Study

LEA Transportation has prepared an updated Transportation Impact Study. The Study provides recommendations to support the full build out of the development. Please refer to the revised Study and LEA's responses in the Response Matrix.

Noise Study

SLR has prepared a revised Noise Study and Response to the Peer Review comments. Please refer to both for a comprehensive response to comments from the City/Region's peer reviewer.

4.0 Summary and Conclusions

MHBC has prepared this Planning Justification Addendum in support of the Official Plan Amendment, and Zoning By-law Amendment applications, and in consideration of the revised plans and comments received from the City and agencies, as well as the City's changes in land use designations that occurred after the application was submitted. The revised plans address the comments and have considered the adopted OPA 58 and Station Area Mixed-Use designation and the new Station Area Mixed Use (SAMU) zone.

While we maintain that retaining the Business Employment designation and SPA 42 was the more appropriate land use framework (as advanced through the formal Official Plan and Zoning By-law Amendment application) within which to guide the current and future development of the lands, we have proposed an alternative land use and zoning framework that both recognizes and continues to permit uses that were already approved for the lands through SPA 42 and C117, and implements the Station Area Mixed-Use and Flexible Industrial designations adopted by Council. Accordingly, we do not object to the implementation of the SAMU zone as it permits the proposed development on the southerly portion of the lands. Furthermore, and provided the uses previously permitted on the lands continue to be permitted in both the Official Plan and Zoning By-law, we do not object to the Flexible Industrial zone on the northerly portion of the lands.

In our opinion,

1. The Proposal is consistent with the policies of the Provincial Planning Statement.
2. The Proposal conforms to the applicable policies of the Region of Waterloo Official Plan.
3. The Proposal achieves the objectives of the Station Area Mixed Use designation.
4. The development proposes a broad mix of uses, including employment, commercial, open space and residential, within a single development, allowing residents to live, work and play within the same area.
5. The residential buildings propose a mix of unit sizes, including a significant supply of three-bedroom units.
6. The development will support active transportation, through internal connections, as well as connections to the Market Trail and active transportation infrastructure on Northfield Drive.
7. The development supports public transit, including the ION Northfield Station, which is located within a short walk of the development.

8. The majority of the buildings are at or below the permitted height in the Official Plan, with only five of the thirteen towers proposed to exceed 30 storeys, to assist in providing variation in building massing and an interesting skyline.

Respectfully submitted,

MHBC



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Partner

MHBC

PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE