

PLANNING JUSTIFICATION & URBAN DESIGN REPORT

445 Anndale Road, Waterloo



EXECUTIVE SUMMARY

This Planning Justification and Urban Design Report ('Report') has been prepared as part of the complete Zoning By-Law Amendment Application for the proposed townhouse development of the property municipally known as 445 Anndale Road, Waterloo ("Subject Lands", "Subject Property", or "Site").

As discussed in this Report, the proposed development contemplates the addition of 57 townhouse and stacked townhouse units across five (5) blocks, offering a mix of one-, two-, and three-bedroom layouts. The existing church is proposed to remain on the subject property and is thoughtfully integrated with the overall development.

A Zoning By-Law Amendment is required to rezone the subject property from Residential One ('R1') Zone to Residential Eight ('R8') Zone to permit the proposed townhouse dwellings (linear and stacked townhouse buildings) and establish Site-Specific Provisions pertaining to the maximum height, shared parking arrangements between the visitor and institutional parking spaces, as well as permitting a *spiritual use* (existing church).

The Report provides an overview of the existing conditions and context of the subject property, the existing land use planning controls applicable to it, the required land use planning applications and land use planning rationale with respect to the same. In addition to discussing the land use planning merits of the application, this Report includes a review and assessment of the City's Urban Design Guidelines as they relate to the subject property.

This Report provides land use planning opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*, is consistent with the Provincial Planning Statement, and conforms to the Regional Official Plan, and City of Waterloo Official Plan.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the proposed development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

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1. INTRODUCTION

Up Consulting Ltd. has been retained by Kindred Works (herein referred to as the 'client' or 'applicant') to provide land use planning services with regards to the proposed redevelopment of the property municipally known as 445 Anndale Road, Waterloo.

This Report has been prepared as part of the complete Zoning By-Law Amendment Application for the proposed townhouse development, consisting of 57 townhouse and stacked townhouse units across five (5) blocks. Of the 57 townhouse dwelling units, 42 are stacked townhouses ('walk-up units') and the remaining 15 are linear townhouses. The applicant is proposing a broad range of unit sizes, including 14 one-bedroom units, 28 two-bedroom units, and 15 three-bedroom units. The existing church is proposed to remain on the subject property and is thoughtfully integrated with the overall development.

A Zoning By-Law Amendment is required to rezone the subject property from Residential One ('R1') Zone to Residential Eight ('R8') Zone to permit the proposed townhouse dwellings (linear and stacked townhouse buildings) and establish Site-Specific Provisions pertaining to the maximum height, shared parking arrangements between the visitor and institutional parking spaces, as well as permitting a *spiritual use* (existing church). As part of a future Consent Application, the applicant intends to sever the existing church, as well as the shared parking spaces from the townhouse development.

The Report provides an overview of the existing conditions and context of the subject property, the existing land use planning controls applicable to it, the required land use planning applications and land use planning rationale with respect to the same. In addition to discussing the land use planning merits of the application, this Report includes a review and assessment of the City's Urban Design Guidelines as they relate to the subject property.

This Report provides land use planning opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*, is consistent with the Provincial Planning Statement, and conforms to the Regional Official Plan, and City of Waterloo Official Plan.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the proposed development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

2. SITE LOCATION AND CONTEXT

The subject property is municipally addressed as 445 Anndale Road, Waterloo, and is legally known as BLK C PL 1453 CITY OF WATERLOO; S/T 640494; WATERLOO. The location of the subject property is shown on Figure 1 below. The subject property is located north of Highway 85, and is bounded by Anndale Road, Davenport Road and Lexington Road.



Figure 1: Aerial Imagery of the Subject Property (Source: Region of Waterloo GIS Portal)

445 Anndale contains a place of worship, Christ Lutheran Church, and its associated parking area. The area immediately surrounding the Church and its parking lot is an underutilized grassed area, containing a walking path and a community garden.

The subject property has a total lot area of 12,046 square metres, with an estimated frontage of 106 metres along Anndale Road, 113 metres along Davenport Road, and 113 metres along Lexington Road. The church has an approximate area of 780 square metres, and the parking lot has an approximate area of 2,300 square metres, leaving much of the existing site undeveloped. Figure 2 below shows a 3D aerial image of the subject property.

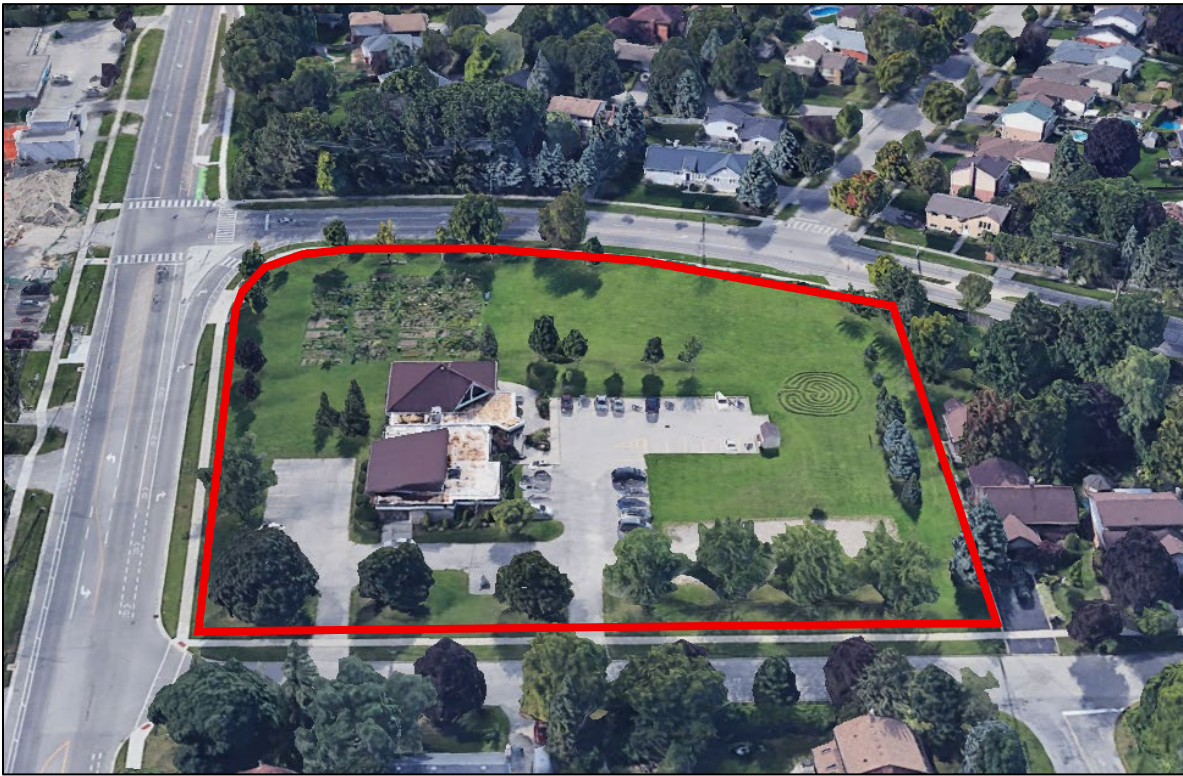


Figure 2: Aerial 3D Model of the Subject Property Facing South-West (Source: Google Earth)

The subject property is situated in a neighbourhood which contains a mix of residential, commercial and institutional uses within close proximity to the site. To the immediate south is an existing retirement building at 215 Lexington Road, identified as “Hygate Retirement Living”. Adjacent to the retirement building is a commercial plaza with smaller, neighbourhood focused convenience stores and services. To the south also exists the Waterloo Mennonite Brethren Church which contains a large religious institutional building and an associated surface parking lot.

Abutting the subject property to the north, east, and west are single-detached dwellings. Townhouses also exist further southeast of the site, to the rear of the Waterloo Mennonite Brethren Church. South-west of the subject property and across Highway 85, more single family detached housing can be found, in addition to a business park area. It is understood that there is no existing or planned interchange providing access to Highway 85 from Lexington Road.

The subject property is located immediately adjacent to bus stops that services Grand River Transit (GRT) routes 29 (Keats-University) and 31 (Columbia); as well as a 10-15 minute walk to a stop that services GRT route 6 (Bridge-Courtland). These routes provide access to the nearby transit stations at Conestoga Mall and westward toward uptown Waterloo and further west to the Boardwalk. The subject property is located within a 5-minute drive along Davenport Road which leads to Conestoga Mall, a Regional Shopping Mall proving many shops and services, including a grocery store, Food Court and Cinema. The closest ION LRT transit stop is located at Conestoga Mall along with a bus terminus.

Figure 3 below shows the neighbourhood context map and should be read in conjunction with the table below.



Figure 3: Neighbourhood Context Map (Source: Google Earth)

Identifier	Description
A	Low-rise residential uses
B	Commercial plaza (209 Lexington Rd)
C	Retirement Building (215 Lexington Rd)
D	WMB Church (245 Lexington Rd)
E	Townhouses
F	Sandowne Public School
G	Civic Ball Diamond Park / Lexington Park
H	Low-rise residential uses
I	Bluestream park

Figures 4 to 7 below show existing land uses located within close proximity to the site. These images reflect the existing uses in the surrounding neighbourhood that were previously described above.



Figure 4: Detached Dwellings on Foxhunt Road Facing West (Source: Google Streetview)



Figure 5: Detached Dwellings on Mayberry Crescent Facing East (Source: Google Streetview)



Figure 6: High Density Retirement Building (215 Lexington Road) Facing South (Source: Google Streetview)



Figure 7: Commercial Plaza (209 Lexington Road) Facing South (Source: Google Streetview)

3. OVERVIEW OF PROPOSED DEVELOPMENT

As shown on the Site Plan prepared by KPMB Architects below, the applicant is proposing to develop townhouse and stacked townhouse buildings across five (5) blocks for a total of 57 dwelling units (Figure 8). Of the 57 townhouse dwelling units, 42 are stacked townhouses ('walk-up units') and the remaining 15 are linear townhouses. The applicant is proposing a broad range of unit sizes, including 14 one-bedroom units, 28 two-bedroom units, and 15 three-bedroom units.

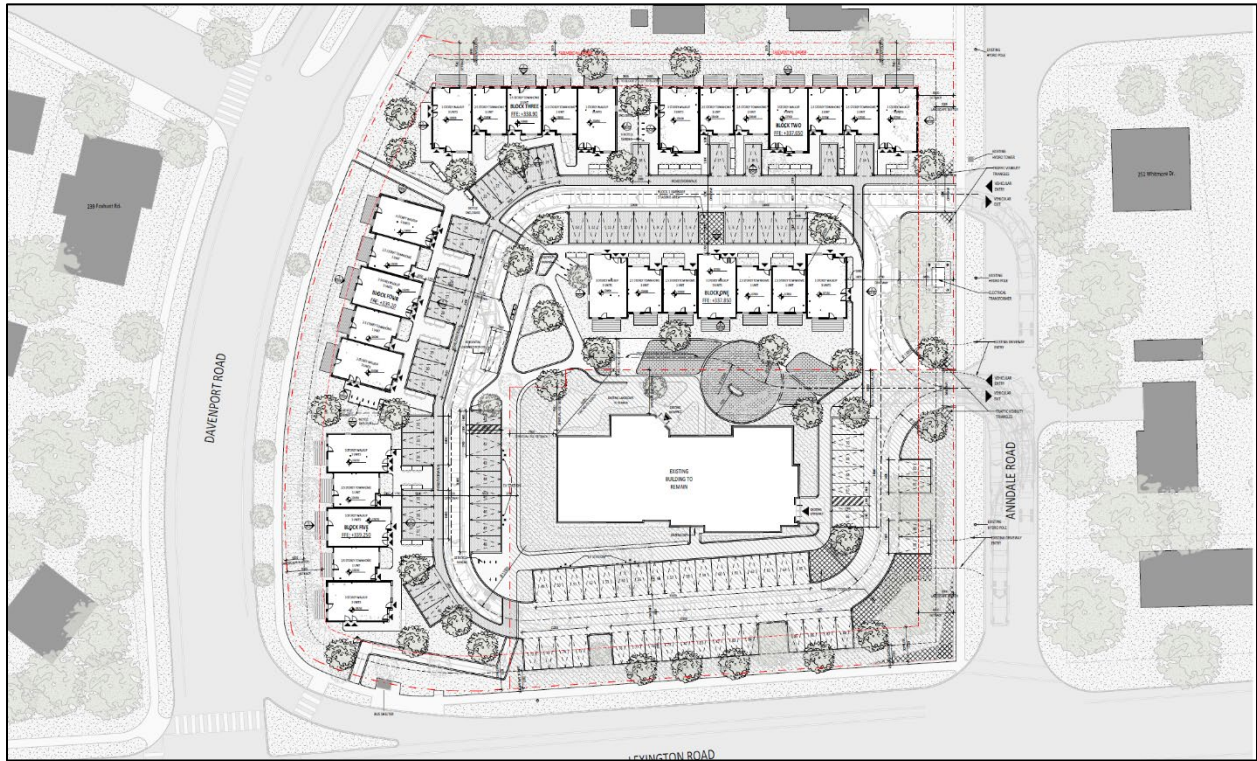


Figure 8: Proposed Site Plan (Source: KPMB Architects)

A total of 57 parking spaces will be provided for the proposed development, representing a parking ratio of 1 parking space per dwelling unit. An additional 35 parking spaces are provided and are intended to be 'shared parking spaces' between the visitor parking in support of the new townhouse dwellings and the existing church/institutional use. Four (4) barrier free parking spaces are also provided, as well as three (3) future electric vehicle ready ('EV-ready') parking spaces. A total of 46 bicycle parking spaces are provided on-site (18 Type 'A' and 28 Type 'B').

The intent of this 'shared parking space' approach is to balance supply and demand by maximizing the efficiency and utilization of the parking area throughout the week. Since church activities typically occur during evenings and weekends, these spaces are expected to remain largely vacant during daytime hours, when visitor demand for the residential component is highest. Conversely, during periods of peak church use, visitor demand for the townhouse units is anticipated to be lower, resulting in a complementary, non-overlapping use of the shared

spaces. This coordinated approach ensures that sufficient parking is available to meet the needs of both uses without requiring an oversupply of spaces.

The proposed development will be accessed by Anndale Road via two (2) access points. The two (2) access points will allow access to both the proposed townhouses and existing church to remain. A central outdoor amenity space is also proposed for the development, providing shared common amenity space for future residents. Through the future site plan application, a detailed landscape plan will be prepared, establishing the details of this space. A comprehensive network of internal sidewalks are also proposed to provide and enhance pedestrian access to all areas of the development.

As previously mentioned, the existing church will remain on the subject property and is appropriately integrated with the overall development. As shown on the Site Plan (red dashed lines), as part of a future Consent Application, the applicant intends to sever the existing church, as well as the shared parking spaces from the townhouse development. The proposed severance line has been designed to accommodate the development of the Block 1 townhouse, proposed stormwater system, and the continued operation of the existing church property. To ensure appropriate long-term functionality and shared access, easements and a development agreement will be established through the subsequent stages of the development approvals process. These instruments will secure access rights, stormwater management obligations, and any necessary servicing arrangements between the parcels.

a. Typical Floor Plans

As shown on Figures 9 to 13, the proposed development contemplates a range and mix of unit sizes, which include basement level units, main floor units and two-floor units at Levels 2 and 3. A mix of one, two and three-bedroom units are proposed to achieve a mix of unit types for future residents.



Figure 9: Proposed Typical Floor Plans – Block 1 (Source: KPMB Architects)



Figure 10: Proposed Typical Floor Plans – Block 2 (Source: KPMB Architects)



Figure 11: Proposed Typical Floor Plans - Block 3 (Source: KPMB Architects)



Figure 12: Proposed Typical Floor Plans - Block 4 (Source: KPMB Architects)



Figure 13: Proposed Typical Floor Plan - Block 5 (Source: KPMB Architects)

b. Building Elevations

Figures 14 to 18 below show the proposed Building Elevations prepared by KPMB Architects. Building materials will be refined during the site plan approvals stage. The north façades of the townhouse blocks have been designed to be street-facing in order to foster interaction with the public realm and to respect the character of the street. Juliette-style balconies are proposed on the 2nd Floor, while hung or inboard balconies are proposed on the 3rd Floor. The southern façade design follows the design of the north facing façades, with changes in balcony placements. At-grade landscaping is proposed to provide a buffer to surrounding roads and adjacent uses.



Figure 14: Block 1 Elevations (Source: KPMB Architects)



Figure 15: Block 2 Elevations (Source: KPMB Architects)



Figure 16: Block 3 Elevations (Source: KPMB Architects)



Figure 17: Block 4 Elevations (Source: KPMB Architects)

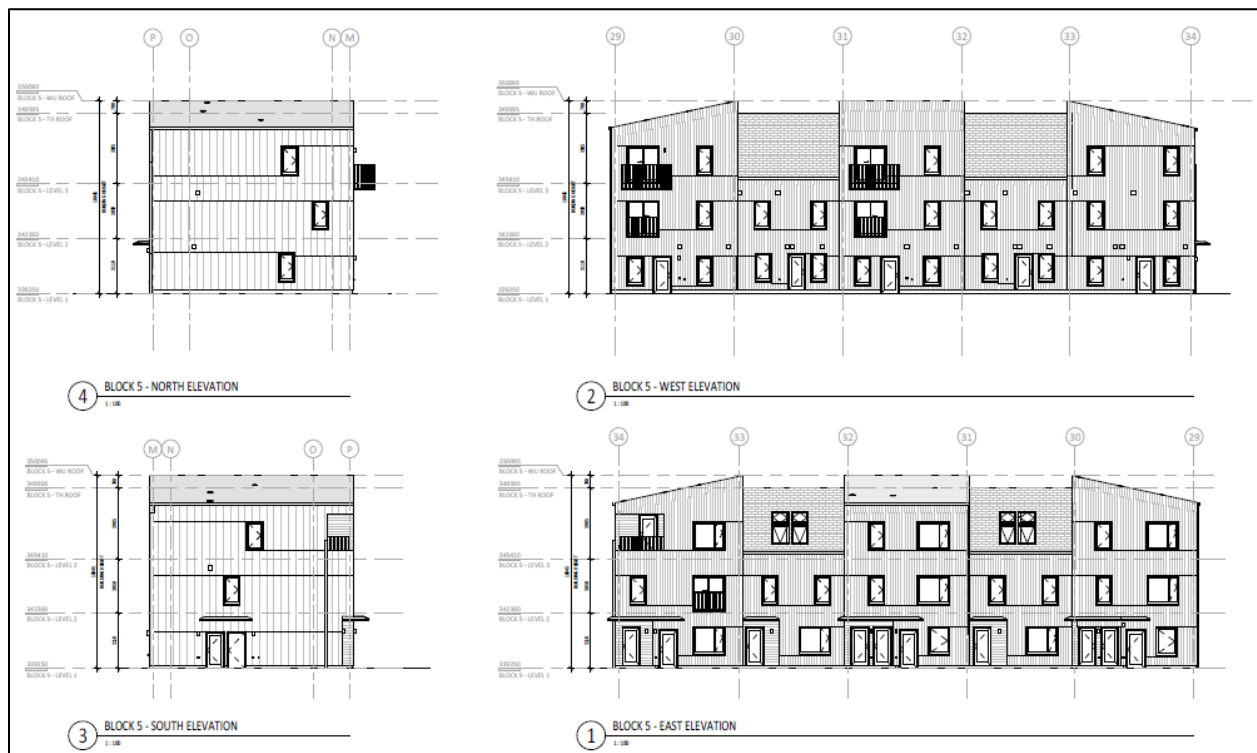


Figure 18: Block 5 Elevations (Source: KPMB Architects)

Figures 19 and 20 below provide 3D models of the proposed development facing North and South.



Figure 19: Proposed Development Projection Facing North (Source: KPMB Architects)

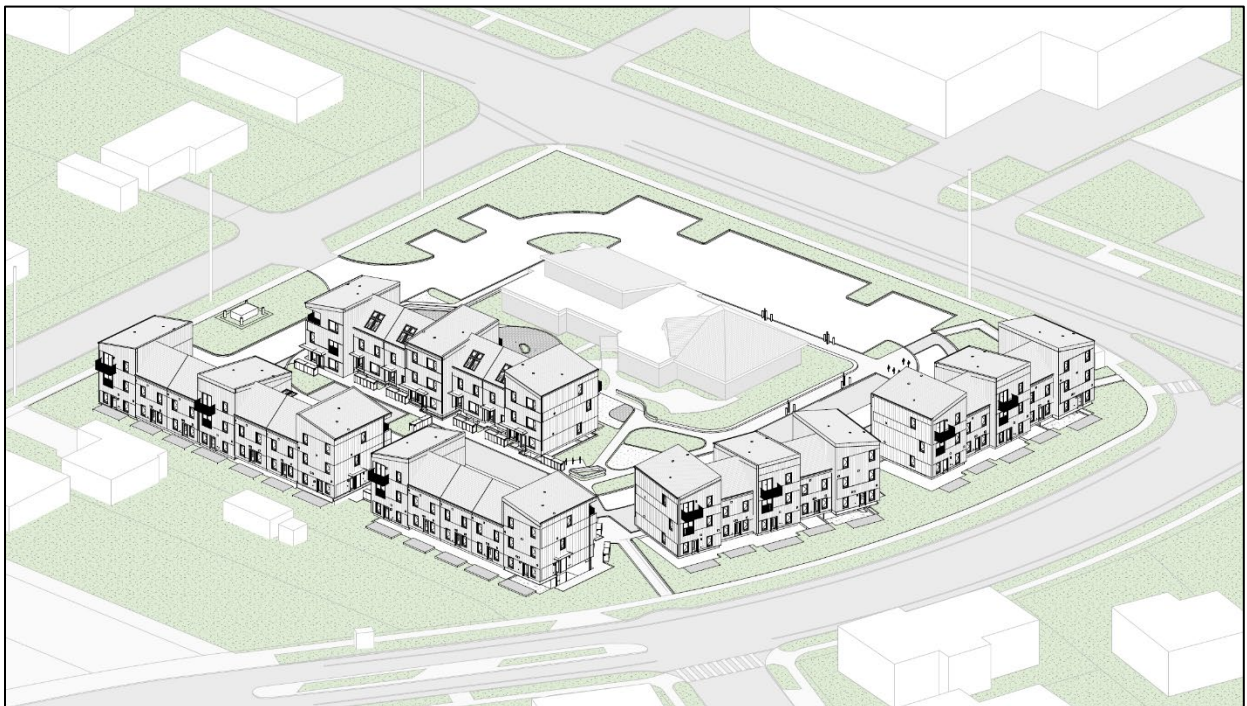


Figure 20: Proposed Development Projection Facing South (Source: KPMB Architects)

c. Renderings

Figure 21 to 24 below show photorealistic renderings of the proposed development from different vantage points. These renderings have been prepared to convey the design intent of the development and to supplement the elevations previously described. As previously mentioned, the final building materials and landscape design will be determined during the site plan approval process.



Figure 21: Rendering Showing Central Landscape Entrance (Source: KPMB Architects)



Figure 22: Rendering Showing Block 2 (Source: KPMB Architects)



Figure 23: Rendering Showing Block 3 Perspective (Source: KPMB Architects)



Figure 24: Rendering Showing North Driveway Perspective (Source: KPMB Architects)

4. REQUIRED LAND USE PLANNING APPROVALS

In order to permit the proposed development, a Zoning By-Law Amendment Application is required. Details of the required application are provided below. Further, please refer to Appendix 'A' attached to this Report for the Draft By-law outlining the requested provisions.

Zoning By-Law Amendment

Rezone the subject property from Residential One ('R1') to Residential Eight ('R8') with the following Site-Specific Provisions:

- Permit a Maximum Height of 12 metres, whereas the Zoning By-law permits a Maximum Height of 10 metres;
- Permit a Minimum of 35 parking spaces as shared parking between visitor and *spiritual use* parking, whereas the Zoning By-law requires a Minimum of 68 spaces (10 for visitor and 58 for *spiritual use*); and,
- Permit *spiritual use* as an additional permitted use.

5. LAND USE PLANNING FRAMEWORK

Land use planning and decision-making related to the same is guided by a range of legislation, policies, and plans set out at the Provincial, Regional, Municipal/City and neighbourhood levels. The following subsections of this Report discuss the land use planning policy framework applicable to the subject property and how they have been considered as part of the proposed development application.

a. Planning Act

The *Planning Act*, R.S.O. 1990 establishes the legal framework for land use planning in Ontario and includes legislative direction with regard to Official Plans, Zoning By-Laws, Draft Plan of Subdivision and Site Plan Approvals among other planning tools. The *Planning Act* also provides the Minister of Municipal Affairs and Housing with policy-making authority to issue policy statements and plans to guide land use planning and development in the province, which is the basis for the Provincial Planning Statement.

The following subsections of this report provide an overview of the *Planning Act* as it applies to the Proposed Development and commentary relating to how the Proposed Development adheres to the direction set out therein.

i. Matters of Provincial Interest

Section 2 of the *Planning Act* sets out various 'Matters of Provincial Interest'. In carrying out their responsibilities under the *Planning Act*, decision-makers must have regard to these Matters of Provincial Interest. Table 1 outlines the Matters of Provincial Interest set out in Section 2 of the *Planning Act* and commentary regarding how each matter has been considered, where applicable.

Provincial Interest	Demonstration of Regard
The protection of ecological systems, including natural areas, features, and functions;	Not applicable.
The protection of agricultural resources of the Province;	Not applicable.
The conservation / management of natural resources and the mineral resource base;	Not applicable.
The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	Though the existing church is not identified as a significant cultural heritage feature or property, the building will be retained as a part of the cultural value of the community.

The supply, efficient use, and conservation of energy and water;	As discussed in the Functional Servicing Report prepared by Arcadis, the proposed development will connect to existing services and represents the efficient use and management of infrastructure.
The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The development contemplates context appropriate intensification that will connect and utilize existing municipal infrastructure. The development contemplates the addition of a private roadway, which will improve transportation connectivity within the area.
The minimization of waste;	Through the site plan and detailed design phases for the development, the applicant will consider sustainable design elements to be incorporated to minimize waste.
The orderly development of safe and healthy communities;	The proposed development will contribute to a mix of housing options and types within the existing area, strategically supporting intensification and urban growth. The development further preserves the existing church to maintain a mix of uses on the site.
The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The proposed development will meet or exceed the standards in the AODA and the OBC, which will be confirmed through the future site plan approvals process.
The adequate provision and distribution of educational, health, and recreation;	The proposed development has regard for the adequate provision and distribution of recreational facilities by proposing common outdoor amenity space.
The adequate provision of a full range of housing, including affordable housing;	The development includes a range of townhouses varying in size, and cost, contributing to the provision of a full range of housing options in the community and greater housing affordability in the area.
The protection of the financial and economic well-being of the Province and its municipalities;	The proposed development will be subject to various municipal fees including development charges, planning and development application and review fees, and development securities.
The co-ordination of planning activities of public bodies;	The use and development of the subject property is guided by a range of Provincial, Regional, and City policies and regulations. The development responds to the planned function of the lands and existing development in close proximity.

The resolution of planning conflicts involving public and private interests;	Through the development review process, the applications will be circulated to the public, internal city and regional departments and other commenting bodies for review to identify potential planning conflicts to be resolved to the extent possible and/or appropriate.
The protection of public health and safety;	The proposed development is not anticipated to result in any adverse impacts to public health or safety, as new housing is proposed on an underutilized lot.
The appropriate location of growth and development;	The proposed development is located within the Region's Urban Area and will contribute to the Region's density target. The site is located within a 5 minute drive of the Conestoga Mall ION Station, as well as good access to public transit, supporting active modes of transportation and transit use to and from the development.
The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The proposed development contemplates sustainable elements, which will be discussed in further detail during the site plan application process.
The promotion of built form that, i) is well-designed, ii) encourages a sense of place, and iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.	As part of the complete application, an Urban Design Brief, contained within Section 6 of this Report, discusses the design of the building, how it encourages a sense of place, and how the design is appropriate within its context, and how it will support a high-quality public realm.

Based on the foregoing, it is our opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*.

b. Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS), 2024 is issued under Section 3 of the *Planning Act* and came into effect on October 20, 2024, replacing the previous version of the PPS, which was issued in 2020, and the A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. Approval authorities, including the City of Waterloo Council, in carrying out their responsibilities under the *Planning Act*, are to ensure that their decisions "are consistent with" the PPS.

The PPS builds upon the policy direction expressed in the *Planning Act* ("Matters of Provincial Interest") related to land use planning, which supports the Provincial goal of enhancing the quality

of life for all citizens of Ontario. This new streamlined province-wide land use planning policy framework builds upon housing-supportive policies from both previous documents.

The focus of the PPS is building a strong and competitive economy by increasing the supply and variety of housing options, prioritizing compact and transit-supportive design, optimizing investments in infrastructure and public service facilities, recognizing the unique role of Indigenous communities and directing growth and development within existing urban and rural settlements to protect natural resources for the long-term, including natural areas, water, aggregates and agricultural lands.

The PPS is to be read in its entirety, and applicable policies are to be applied to specific situations/applications. The following table provides a summary of relevant policies of the PPS and describes how the Proposed Development is consistent with this policy direction.

Section No.	Policy	Discussion of Consistency
Planning for People and Homes		
2.1.4	Providing an appropriate range and mix of housing options and densities by: a) Maintaining at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and b) Maintaining at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.	a) The proposed development utilizes available lands for medium-density housing in the form of townhouse and stacked townhouses, contributing to a diverse housing market that meets evolving community needs. b) As discussed in the Functional Servicing Report prepared by Arcadis, the proposed development will connect to existing services.
2.1.6	Planning authorities should support the achievement of complete communities by: 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;	a) The proposed 57 residential dwelling units provides a mix of housing types to the area of predominantly single-detached dwellings, promoting a complete community with easy access to essential services and amenities. b) The location and design of the proposed development promotes walkability and offers easy access to current and future public transit and

	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.	local services, supporting inclusivity for all residents c) The mix and supply of unit types will contribute affordability and diversity. The inclusion of outdoor amenity space intends to enhance residents' quality of life, promoting social equity and well-being.
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Housing

2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; b) permitting and facilitating: i. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and ii. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites. 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	A range of unit types are proposed within the 57 townhouse units of varying sizes. This mix of unit types will allow for the provision of housing alternatives for a number of incomes with access to existing and future public services. The proposed development will support the provision of alternative housing options at a density that supports transit, which contributes to the overall mix of uses along this portion of Anndale and Lexington Road, while making more efficient use of existing infrastructure and land.
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	potential air rights development, in proximity to transit, including corridors and stations.	
Settlement Areas		
2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	The subject lands are located within the City of Waterloo Settlement Area boundary, and within an identified “Delineated Built-Up Area” in the Regional and City Official Plan.
2.3.1.2	Land use patterns within settlement areas should be based on densities and a 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; e) and are freight-supportive	a) The proposed development will efficiently use land and resources by introducing a medium density housing on an underutilized parcel. b) The site will utilize and invest in existing and planned infrastructure and public service facilities, optimizing the use of these systems. c) The proposed development is surrounded by a mix of commercial, employment and institutional uses, encouraging regular, non-motorized travel. The site is also adjacent to an existing bike lane network along Lexington Road and Davenport Road. d) The site is in proximity to easily accessible public transit bus stops/routes and will increase ridership potential. e) The proposed will maintain appropriate access for delivery and service vehicles.
2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities	The proposed development aligns with goals of intensification and complete communities, proposing 57 residential units to the underutilized lands. This will provide diverse housing options and enhance the community by prioritizing necessary infrastructure and public services.
Sewage, Water and Stormwater		

3.6.1	Planning for sewage and water services shall: a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services; b) ensure that these services are provided in a manner that: - can be sustained by the water resources upon which such services rely; ii. is feasible and financially viable over their life cycle; iii. protects human health and safety, and the natural environment, including the quality and quantity of water; and iv. aligns with comprehensive municipal planning for these services, where applicable. c) promote water and energy conservation and efficiency; d) integrate servicing and land use considerations at all stages of the planning process; e) consider opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply; and f) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.	The subject property is proposed to connect to the existing water, wastewater and sanitary mains. A Functional Servicing Report was prepared by Arcadis confirming there is sufficient servicing capacity for the proposed development, as summarized in Section 7.c of this Report.
3.6.2	Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and	The development will connect to existing and upgrade municipal water and sanitary services available to the site, as per the Functional Servicing Report prepared by Arcadis.

	municipal water services include both centralized servicing systems and decentralized servicing systems.	
3.6.8	Planning for stormwater management shall: a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure; d) mitigate risks to human health, safety, property and the environment; e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.	The subject property is proposed to connect to existing storm infrastructure, and the detailed stormwater design will be confirmed through the future Site Plan Approvals process. Please refer to the Stormwater Management Brief prepared by Arcadis for details.

Based on the foregoing, it is our opinion that the proposed development is consistent with the PPS 2024.

c. Region of Waterloo Official Plan

The Regional Official Plan (“ROP”) of the Regional Municipality of Waterloo served as a legal framework guiding land use decisions, establishing goals and objectives to manage and direct physical land use change and its effects on the social, economic, and natural environment. It outlines policies to ensure that new developments meet the needs of current and future residents, promoting sustainable and livable communities. The ROP was developed in consultation with community groups, area municipalities, First Nations, the general public and other key interest holders. As of January 1, 2025, the ROP became an Official Plan of each of the area municipalities. This means that 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.

As of January 1, 2025, changes to Ontario’s land use planning framework under Bill 23, the More Homes Built Faster Act, 2022, came into effect for the Regional Municipality of Waterloo. As a

result, certain land-use planning responsibilities were transferred from the Region to the area municipalities within Waterloo Region.

i. Urban Area and Built-Up Area

The ROP identifies the subject property as within the City of Waterloo Urban Area and Built-Up Area, as per Map 2 of the ROP (Figure 25). The Built-Up Area includes all lands within the built boundary of the Region's Urban Area and Township Areas.

Policy 2.B.1 of the ROP identifies the direction of forecasted population growth to key structural components of the Regional urban system, including delineated built-up areas as shown on Map 2, outside of strategic growth areas through gentle density and a broader range of missing middle housing options (2.B.1.1.a) (2.B.1.1.c). It is our opinion that the proposed townhouse development will provide gentle density and missing middle housing options for the Region.

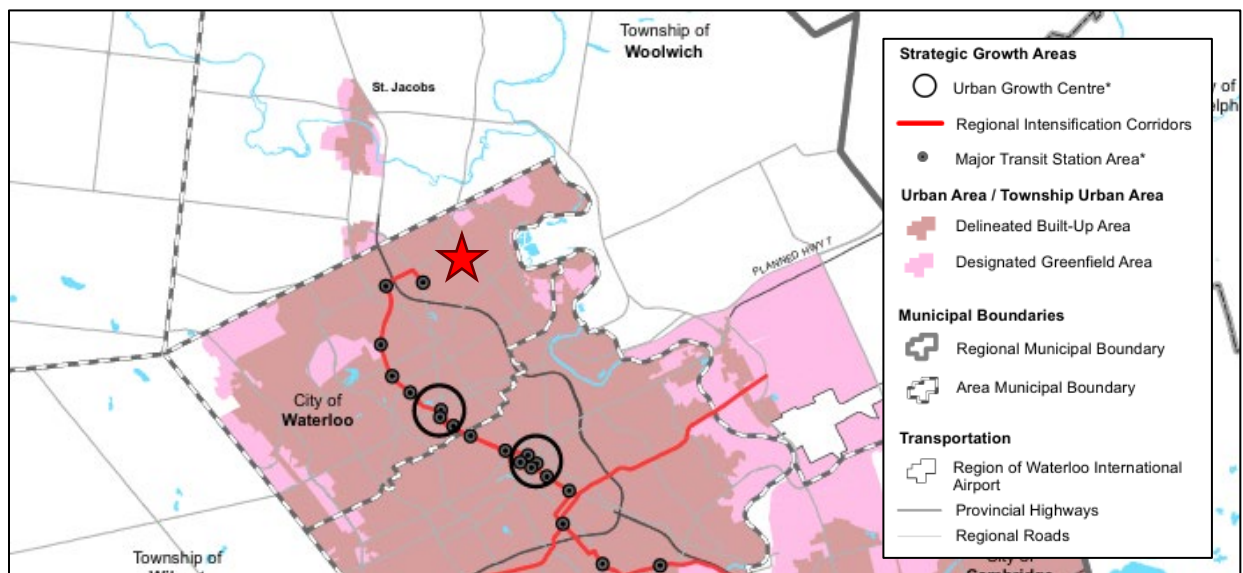


Figure 25: Regional Official Plan, Map 2 Urban System (Source: Region of Waterloo Official Plan)

Policy 2.C.2.2. establishes development criteria for development within Urban Areas is planned and developed in a manner that:

Policy Number	Policy / Objective	Discussion of Conformity
(a)	Implement the Regional urban system.	The proposal supports the City of Waterloo's role as an Urban Area by promoting gentle density to serve the growing population and provide housing variety to the surrounding residential area.

(b)(i)	Promote a more compact built form that enables walking, cycling, and rolling.	The proposed development supports a walkable environment by enabling local access to goods and services within proximity to residents.
(b)(ii)	Contribute to 15-minute neighbourhoods.	The proposal provides convenient services within walking or cycling distance. The site is accessible to a variety of necessities, leading to a complete community.
(b)(vii)	Meet municipal High Performance Development Standards.	Details to be determined at Building Permit Application stage.
(c)	Ensure municipal water and wastewater servicing.	The site is within the City of Waterloo's Urban Area and is currently serviced by existing municipal water and wastewater infrastructure.
(e)	Provides a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate the needs of all household sizes and incomes, in accordance with all applicable policies of this Plan.	The proposed development contemplates a variety of housing typologies, catering to various levels of income and lifestyles. As previously mentioned, 57 townhouse units are proposed.
(g)	Avoid land use patterns that pose risks to health/safety/environment.	The residential use is compatible with existing residential uses, posing no risk to public health or safety.
(h)	Improve accessibility for all ages and abilities.	The residential uses will be required to meet accessibility standards under the AODA at the building permit stage.
(i)	Ensures the development of high quality urban form through site design and urban design standards that create an attractive and vibrant public realm.	The proposal is designed with high quality urban form to complement the character of the surrounding context.
(j)(i)	Expands residents' convenient access to: A range of transportation options, including a mobility network that is safe, comfortable and convenient for walking, cycling, and rolling for people of all ages and abilities and at all times of year.	The proposed development is located in proximity to various transportation options, including GRT bus routes, and pedestrian and cycling infrastructure.
(j)(ii)	Public service facilities, co-located and integrated in community hubs	The site is located within proximity to Conestoga Mall, consisting of a broad

		range of goods and services. Additionally, the site is located in proximity to GRT routes and the Conestoga Parkway, allowing for efficient travel.
(j)(iii)	An appropriate supply of safe, publicly-accessible urban greenlands, open spaces, parks, trails, and other opportunities for recreation in accordance with the policies in Chapter 3; and	The site is within close proximity to various community parks, with Bluestream Park located 750 metres away, and Civic Bell Diamond Park located 350 metres from the site, providing opportunity for recreation and access to open space.
(k)(i)	Expand access to transportation options.	The site is currently accessible to pedestrians and cyclists, and supports multi-modal access in the community.

Overall, it is our opinion that the proposed development conforms to these policies of the ROP, which encourage residential development that is accessible via active transportation to amenities and services, and has no adverse impacts to the surrounding context.

Within the Delineated Built-Up Area, the ROP (Section 2.F) directs that eighty-three percent (83%) of intensification targets should be directed by the area municipality to support efficient land use, with a minimum of 19,740 units by 2051. By proposing redevelopment to the subject property located within the Built-Up Area, the proposed development will help satisfy the Region's density target for intensification.

The ROP directs that area municipalities, in collaboration with the Region, will develop and adopt a strategy to meet or exceed the minimum intensification targets, and intensification more broadly throughout delineated built-up areas, which will (2.F.2):

Policy Number	Policy / Objective	Discussion of Conformity
(c)	Enable intensification more broadly throughout the area municipality's delineated built-up area through gentle density and other missing middle housing options.	The proposal enables intensification by adding density to the site, allowing for housing options that complement the existing neighbourhood character.
(d)	Ensure lands are zoned and development is designed in a manner that supports the achievement of 15-minute neighbourhoods.	The proposed Zoning By-law Amendment will facilitate a mix of housing typologies that are within walking distance to accessible services, and various modes of transit, including GRT routes and active transportation infrastructure.

(e)	Support the gradual transition of existing neighbourhoods into 15-minute neighbourhoods that are denser, more energy efficient, and liveable.	The proposed development contemplates efficient building design and compact form to support a more sustainable and liveable community, fostering incremental change towards complete neighbourhoods.
(f)	Guide and prioritize planning and investment in efficient and modern infrastructure and public service facilities that will support intensification.	The site is serviced by existing municipal infrastructure and public services, making it a cost-effective location for development without the need for significant new infrastructure investment.
(g)	Be implemented through the area municipality's official plan policies, designations, updated zoning by-laws, secondary plans, and other supporting documents.	The application aligns with the Official Plan's growth management policies and will be implemented through a Zoning By-Law Amendment consistent with broader municipal planning documents.

Section 3.A states the Regional support for a diverse range and mix of housing options and densities, including additional residential units, to serve all sizes, incomes and ages of households. Area municipalities in collaboration with the Region, will plan to provide a diverse range and mix of housing options with an overall target of a minimum of thirty percent (30%) of new ownership and rental housing being affordable to low and moderate-income households. The range and mix of housing options provided will vary in terms in terms of form, tenure, density, and number of bedrooms to accommodate the needs of all sizes, incomes, and ages of households (3.A.2). Development applications proposing residential uses will be required to indicate if and how they are contributing to meeting the affordable housing target set out in Policy 3.A.2, and include an assessment of mix and range of types, bedroom mix, unit sizes, tenures, and accessibility requirements (3.A.17).

The proposed development is consistent with Section 3.A of the ROP, which emphasizes the provision of a diverse range and mix of housing options to meet the needs of households of varying sizes, incomes, and ages. The proposal includes a total of 57 townhouse and stacked townhouse units, comprised of 14 one-bedroom units, 28 two-bedroom units, and 15 three-bedroom units. This range of unit sizes will accommodate a variety of household types, from singles and couples to families, thereby supporting the Region's objective of housing diversity.

The stacked townhouse form further contributes to housing affordability by offering compact, ground-oriented units at a lower cost relative to detached housing, while the integration of EV-ready spaces and bicycle parking supports sustainable living choices. Although no formal affordability component is proposed at this stage, the project introduces a supply of medium-density housing in proximity to transit, commercial areas, and community amenities, which contributes to overall housing choice and supports the Region's affordability target in a broader sense.

Based on the foregoing, it is our opinion that the proposed development conforms to the policy direction set out in the ROP for its Urban Area and Built-Up Areas.

d. City of Waterloo Official Plan

The City of Waterloo Official Plan was adopted by Municipal Council in 2012 and sets out the policies that direct growth and change until 2031. The City of Waterloo Official Plan established a policy framework to guide public and private sector decisions relating to development and the provision of community infrastructure and services. The local Official Plan also sets out the intentions of City Council relating to future economic, social and land use changes to the year 2031.

It should be noted that the City of Waterloo is currently undergoing a review of their Official Plan. It is understood that the City is conducting their Official Plan Review in “Phases”, which allows for key chapters in the City Official Plan to be updated in the short term, in response to current planning pressures and strategic priorities. The City has completed Phase 1, whereby the City of Waterloo adopted Official Plan Amendment No. 58 (OPA 58) as part of its Official Plan Review process in December 2024. OPA 58 is discussed further in Section 6.e) of this Report.

The following subsections of this Report discuss the current policies and land use designations that apply to the subject lands, and which are relevant to the proposed Zoning By-law Amendment application.

i. Land Use Designation – Low Density Residential

The subject lands are currently designated ‘Low Density Residential’, as per Schedule ‘A’ of the Official Plan (Figure 26).

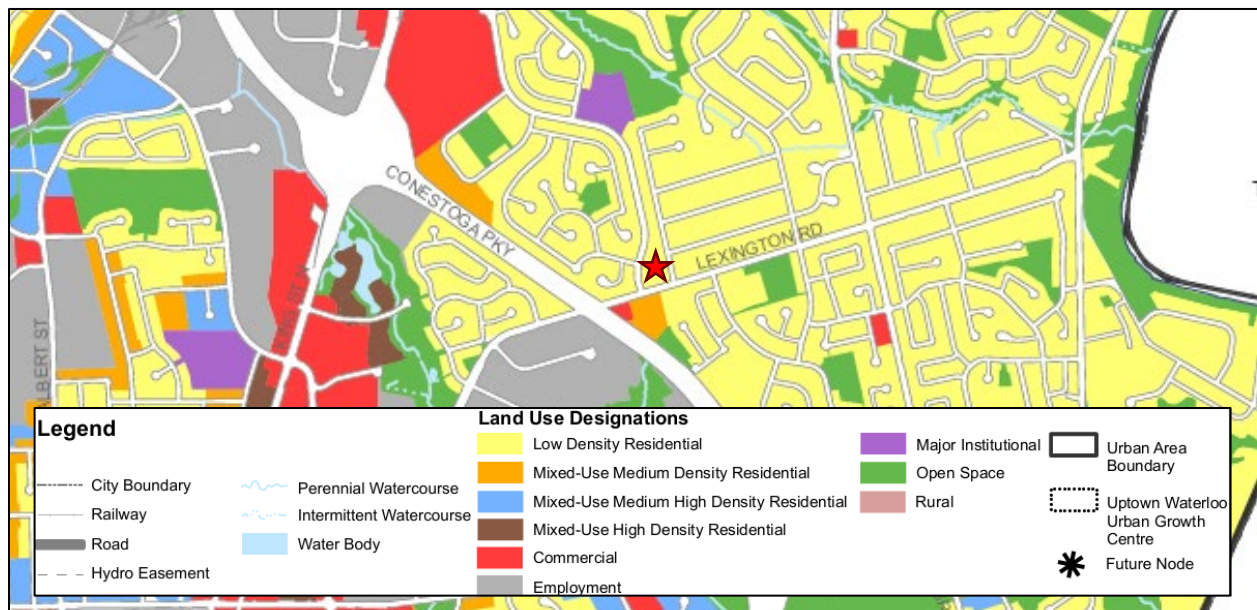


Figure 26: City of Waterloo Official Plan, Schedule A - Land Use (Source: City of Waterloo)

As per Section 10.1.3(1) of the Official Plan, this designation aims to permit a mix of low- density residential building types across neighbourhoods that support and are generally consistent with the existing low-rise character of the area. Lands designated 'Low Density Residential' may be zoned to permit specific low-rise building forms being one or more of the following: single-detached dwellings; semi-detached dwellings; duplex dwellings; triplex dwellings; and townhouses. A number of unique sites may also be zoned to permit terrace dwellings and or apartment units.

Based on the above policy, the proposed townhouse development is considered a permitted use in the 'Low Density Residential' designation.

Section 10.1.3(2) of the Official Plan further states that lands designated 'Low Density Residential' may be zoned to permit 'spiritual uses' as a complementary use, subject to the provisions of the Official Plan, provided the use does not impact the ability of the lands to achieve the vision and policies in this designation.

Based on the above policy, the existing church to remain on the subject property and to be integrated with the proposed development is a permitted use in the 'Low Density Residential' designation. Given this spiritual use has existed prior to the initiation of this Zoning By-law Amendment Application, it is our opinion that this use will continue to achieve the vision and policies in this designation.

Section 10.1.3(5) of the Official Plan notes that new development shall respect and reinforce the general physical patterns in the neighbourhood, including those established by:

- (a) street and block configurations;
- (b) lot sizes and configurations;
- (c) building height, bulk, and spacing on nearby lands with similar characteristics; and,
- (d) building setbacks.

It is our opinion that the proposed development addresses the criteria above, as the proposal has been designed to respect and reinforce the existing physical patterns of the surrounding neighbourhood. The street and block configuration aligns with the existing Anndale Road frontage, providing logical access points and maintaining connectivity with adjacent properties. Lot sizes and configurations have been planned to integrate seamlessly with neighbouring parcels, reflecting a consistent pattern of medium-density residential lots. The building height, massing, and spacing have been carefully considered to ensure compatibility with surrounding residential uses, with the modest increase in height to 12 metres allowing for functional stacked townhouse units without overwhelming adjacent properties. Setbacks have been established to maintain appropriate separation from property lines, provide usable outdoor amenity space, and ensure adequate light, privacy, and visual transition to neighbouring lands.

Section 10.1.3(8) of the Official Plan also provides additional direction with respect to the development of terrace dwellings as follows:

Policy / Criteria	Discussion of Conformity
(a) The property is not located within a Heritage Conservation District;	Not applicable.
(b) Terrace dwellings and or apartments represent an appropriate and desirable land use for the neighbourhood;	The proposed townhouses provide an appropriate and desirable infill residential use, offering a mix of one-, two-, and three-bedroom units. The development contributes to housing choice within the neighbourhood while respecting the existing low- to medium-density residential character.
(c) Terrace dwellings and or apartments will not destabilize the neighbourhood;	The scale, massing, and spacing of the proposed buildings have been carefully designed to integrate with the surrounding area. Setbacks, building height, and orientation have been coordinated to maintain compatibility, ensuring that the development will not destabilize the neighbourhood.
(d) The proposal will achieve a high standard of urban design, with emphasis on: (i) Site and building design that complement and enhance the surrounding neighbourhood character; (ii) Landscape design that creates visual interest, 'green' the site, and buffer; and, (iii) Prominent entrances that emphasize the streetscape	(i) The site plan incorporates articulated façades, varied building forms, and a pedestrian-oriented layout that enhances the streetscape and reinforces the character of the neighbourhood. (ii) Landscaping includes a central amenity space, perimeter plantings, and internal pathways that create visual interest, promote sustainable site greening, and provide buffers to neighbouring properties. (iii) Building entrances are oriented toward the public streets and internal pedestrian pathways, emphasizing connectivity and the public realm. This ensures that entrances contribute to a cohesive and active streetscape.
(e) Sufficient infrastructure exists to service the site;	The proposed development can be fully serviced by existing municipal infrastructure, including water, sanitary, and stormwater systems. Any necessary servicing easements and development agreements will be implemented as conditions of future approvals to ensure long-term functionality.
(f) The development capacity of the site is not exceeded, and the proposal does not require significant relief from standard regulations;	The proposed density conforms to the maximum density permissions of the Official Plan and proposed Zoning By-law classification. Minor, site-specific zoning relief is requested, which are consistent with functional and design requirements.
(g) The development maintains the land use intensity of the surrounding	The proposed development provides a compatible increase in density without overwhelming surrounding low-density residential lands. The scale and massing have been carefully

low density residential neighbourhood;	moderated, and setbacks have been maintained to ensure an appropriate transition.
(h) The development results in context-sensitive intensification in the low density residential neighbourhood and,	The project represents context-sensitive intensification by introducing townhouses and stacked units that integrate with the existing streetscape, preserve open space, maintain privacy, and provide shared amenity space, thereby enhancing the neighbourhood without disrupting its character.
(i) The proposal complies with other criteria that may be deemed appropriate by the City based on the context of the site.	The proposal has been prepared in accordance with City policies.

In addition to the criteria mentioned above, Section 10.1.3(9) of the Official Plan provides that applications to amend the Zoning By-Law to permit terrace dwellings and/or apartments will be reviewed within the context of locational criteria deemed appropriate by the City including the following criteria:

Policy / Criteria	Discussion of Conformity
(a) The property is located on the periphery of a low density residential neighbourhood, or is adjacent to a school site;	The subject property is located at the periphery of a low-density residential neighbourhood, fronting Anndale Road and adjacent to a mix of residential and institutional uses. Its location at the edge of the neighbourhood makes it suitable for a townhouse development, providing a transition between the low-density residential area and the existing church/institutional property. This edge location supports intensification in a manner that is context-sensitive and complementary to the surrounding streetscape.
(b) The property abuts a designated Node or Corridor, and buffers other properties designated Low Density Residential from properties within the designated Node or Corridor; and	While the site is not formally adjacent a designated Node or Corridor, the subject property is within immediate proximity of lands to the south that are designated and zoned for medium to high density mixed-use development. This area has seen an increase in density supported by it's proximity to the Highway 85, Conestoga Mall, dedicated bike lanes, and access to public transit. It is our opinion that townhouse dwellings are an appropriate use for this evolving neighbourhood and provides a logical transition and/or buffer between the low-rise residential uses to the north/east/west and medium-to-high density use to the south.
(c) The property has direct vehicular access onto an arterial or major collector road	The subject property abuts two (2) major collector roads, being Lexington Road and Davenport Road.

ii. Height and Density – Low Density, 10 metres

The subject property is within the ‘Low Density, 10 metres’ designation, as per Schedule ‘B1’ in the Official Plan (Figure 27). As per Section 3.4(1) of the Official Plan, the maximum permitted height on the subject lands is 10 metres within this designation. Further Section 3.4(2) of the Official Plan provides a maximum density of 150 bedrooms per hectare within this designation.

Notwithstanding, Policy 10.1.3(11) of the Official Plan provides that “the maximum permitted height of any site permitting apartment units within the Low Density Residential designation will be up to 12 metres” which would apply given the proposed use is considered an apartment use for the purposes of the By-law. This was also clarified with City Staff during the Pre-Consultation Meeting. Given this, no site specific relief from the Official Plan is required to permit the proposed building heights.

The proposed development also adheres to the maximum density requirement of the Official Plan, as a total density of 143 bedrooms per hectare is proposed, whereas a maximum of 150 bedrooms per hectare is permitted. While not yet in effect and as discussed further in Section 6.e) of this Report, the permitted maximum height on the subject lands was amended as part of adopted OPA 58 to maximum of 4 storeys and removed the 10 metres requirement. The density requirement was also removed as part of OPA 58 and may be established in the implementing Zoning By-law. Though OPA 58 is currently not in-force and effect, the proposed development would align with the planned function of the subject lands per Council’s direction.

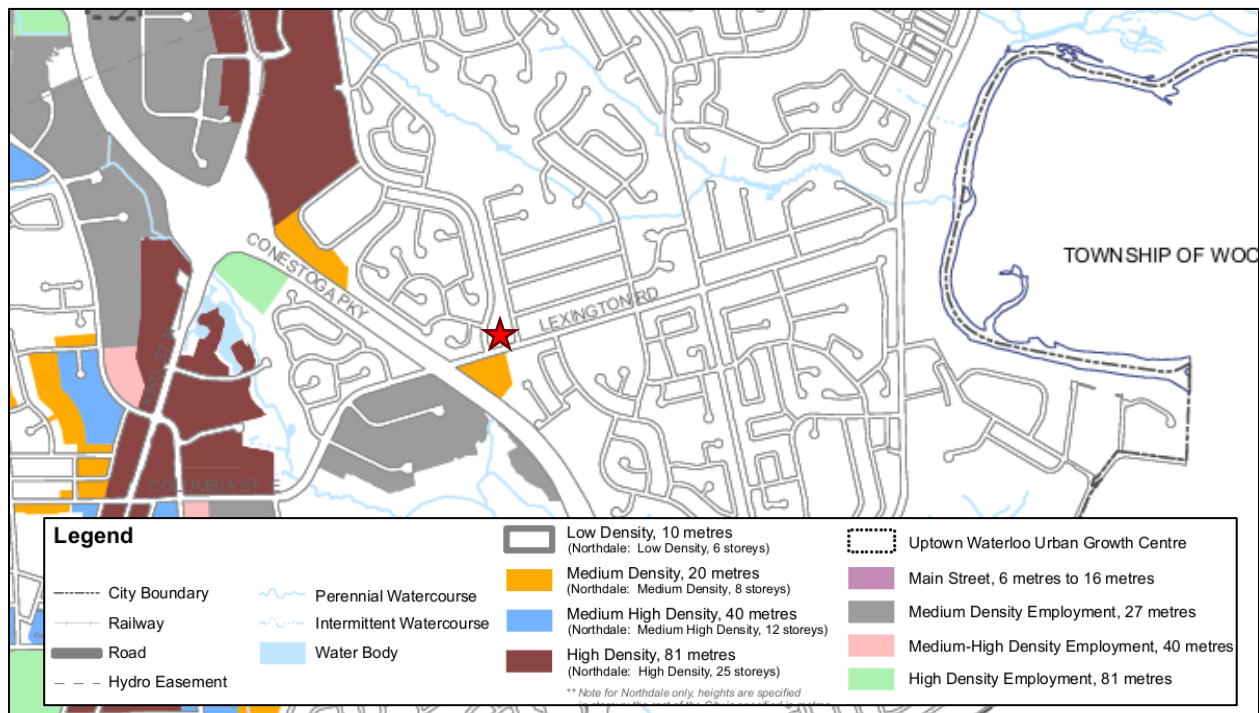


Figure 27: City of Waterloo Official Plan, Schedule B1 – Height and Density (Source: City of Waterloo)

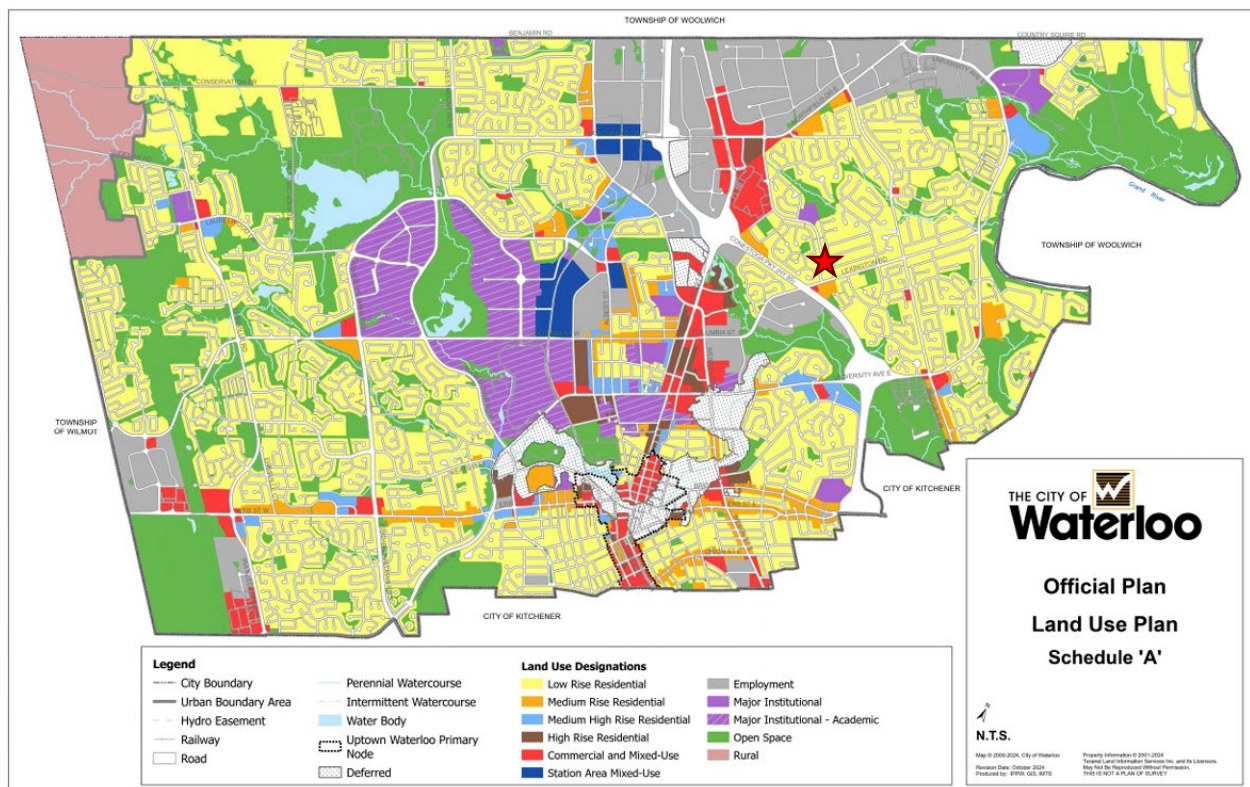
e. City of Waterloo Official Plan Amendment No.58

The City of Waterloo is working on a multi-phased review of its Official Plan, which allows for key chapters in the City Official Plan to be updated in the short term, in response to current planning pressures and strategic priorities. The City has completed Phase 1, whereby the City of Waterloo adopted OPA 58 as part of its Official Plan Review process in December 2024. The intent of OPA 58 was to align the City's Official Plan with various provincial legislative changes such as Bill 23, 109 and 185, the new PPS 2024, and the Region of Waterloo Official Plan (specifically ROPA 6).

The final implementation of the adopted OPA 58 is still subject to the approval of the Minister of Municipal Affairs and Housing, which is anticipated in 2025. Therefore, OPA 58 is not in-force and effect at this time. Notwithstanding this, the following subsections of this Report provide an analysis of the Council adopted OPA 58 and how the proposed development meets the overall intent, goals and objectives of the amendment.

i. Land Use Designation – Low Rise Residential

The subject lands are proposed to be designated 'Low Rise Residential' in in Schedule 'A' of OPA 58 (Figure 28). Though many of the policies from the current 'Low *Density* Residential' designation remain the same, the following provides an overview and analysis of the adopted policies.



As per Section 10.1.3(1) of OPA 58, the proposed townhouse dwellings remain as a permitted use within the 'Low Rise Residential' designation. Further, Section 10.1.3(2) still permits spiritual uses as complementary uses within this designation. Therefore, the proposed townhouse dwelling and existing church would still be permitted.

Several changes to the criteria in Section 10.1.3(9) were proposed as part of OPA 58, as this policy notes that applications to amend the Zoning By-law to permit stacked townhouse dwellings or apartments (or an equivalent housing form) will be reviewed within the context of locational criteria deemed appropriate by the City including the following criteria:

Policy / Criteria	Discussion of Conformity
(a) The property is located on the periphery of a low rise residential neighbourhood; or	The subject property is situated at the edge of an established low-rise residential neighbourhood, fronting Anndale Road and adjacent to the existing church/institutional use. Its location on the periphery makes it well-suited for townhouse development, allowing for a sensitive transition between the low-density residential area and the surrounding uses.
(b) The property is located within a Major Transit Station Area as identified on Schedule 'B'; or,	Not applicable.
(c) The property is in close proximity to a school site or other community uses; or,	The site is near community-oriented facilities, including the existing church, which provides spiritual and institutional functions. While no schools are immediately adjacent, the subject property is within a 10-15 minute walk (3-minute bike, 1-minute drive) of Sandowne Public School to the east, as well as several parks within proximity. It is our opinion this reinforces the suitability of the site for residential intensification, supporting access to local amenities and contributing to a complete neighbourhood.
(d) The property is in close proximity to existing or planned transit; or,	The site is well-served by existing and planned transit infrastructure, including the existing GRT stops adjacent to the site, providing access to routes 29 (Keats-University) and 31 (Columbia); as well as a 10-15 minute walk to a stop that services GRT route 6 (Bridge-Courtland). The closest ION station would be to north at Conestoga Mall. This proximity promotes sustainable transportation options, encourages reduced reliance on private vehicles, and aligns with the City's objectives for transit-supportive development in areas identified for intensification.
(e) The property is in close proximity to commercial	The subject property is located within convenient distance to nearby commercial and retail amenities to the west of the site

centres or neighbourhood shopping areas; or,	along Lexington Road. The subject property is also within a 20–25-minute walk (6-minute bike, 3-minute drive) of the Conestoga Mall to the north. This provides future residents with access to goods and services within a short walking or cycling distance, supporting the creation of a complete and livable community.
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Based on the above, it is our opinion that the proposed development would conform to the adopted land use designation policies of OPA 58.

ii. Built Form – Low Rise, 4 Storeys

The subject lands are proposed to be designated ‘Low Rise, 4 Storeys’, as per Schedule ‘A1’ of OPA 58 (Figure 29).

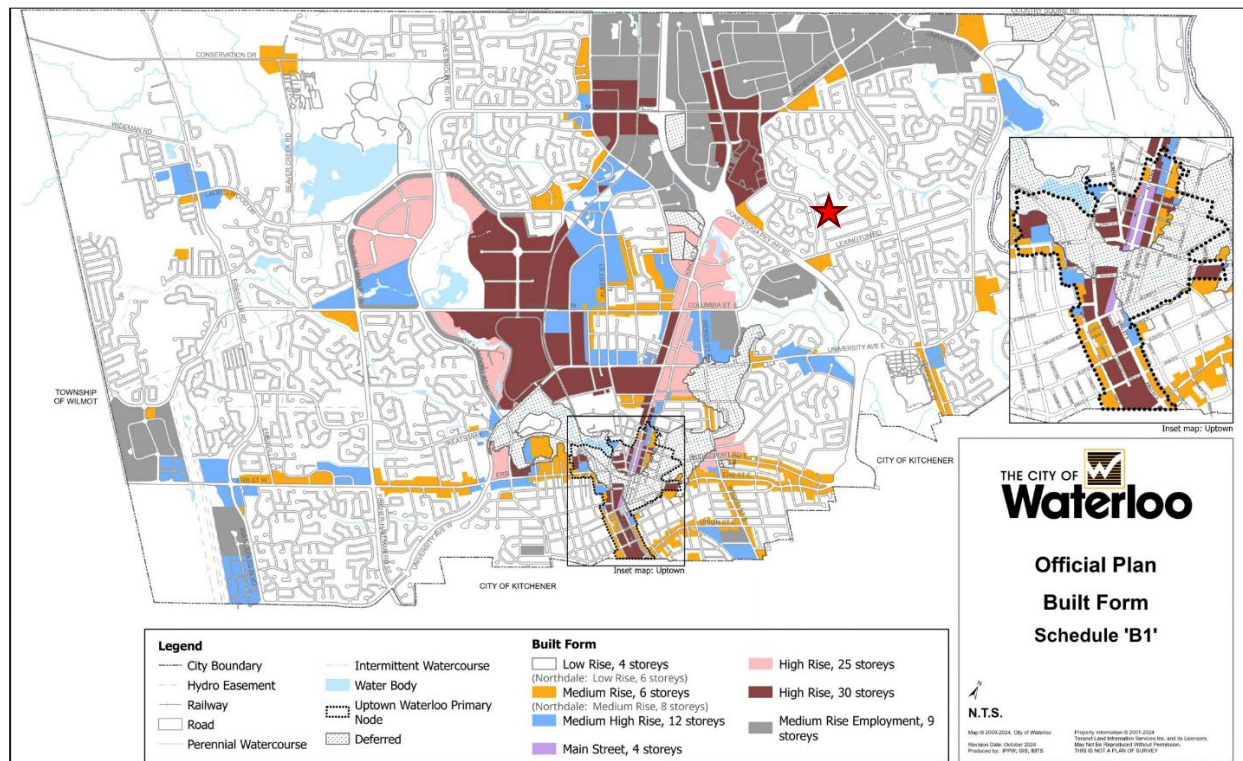


Figure 29: Official Plan Amendment No.58, Adopted Schedule 'B1' - Built Form (Source: City of Waterloo)

As previously mentioned in Section 6.d.ii) of this Report, OPA 58 proposes to remove the 10 metre maximum height requirement and replace this policy with a maximum height of 4 storeys. The density requirement of 150 bedrooms per hectare was also removed as part of OPA 58 and may be established in the implementing Zoning By-law. The proposed development would conform to the proposed maximum height policy, as the maximum height is 12 metres or 3 storeys.

Based on the above, it is our opinion that the proposed development would conform to the adopted built form policies of OPA 58.

f. City of Waterloo Zoning By-law 2018-050

The subject property is currently zoned Residential One ('R1') in the City of Waterloo Zoning By-law 2018-050, as shown in Figure 30 below. As per Section 7.1.1 of the Zoning By-law, the R1 Zone permits a single-detached buildings as the primary use. Therefore, the proposed linear townhouse and stacked townhouse uses are not permitted in the current R1 Zone.



Figure 30: Zoning of the Subject Property (Source: City of Waterloo, Zoning By-law Interactive Map)

i. Proposed Zoning – R8 Zone

In order to permit the proposed development of townhouse and stacked townhouse buildings on the subject property, a Zoning By-law Amendment is required. Based on our review of the Zoning By-law, surrounding context, and direction from City Staff in the Pre-Consultation Record, the applicant is proposing to rezone the subject property from R1 to Residential Eight ('R8') Zone.

As per Section 7.8.1 of the Zoning By-law, the R8 Zone permits a broad range of medium density uses, including the proposed townhouse and stacked townhouse buildings. As previously mentioned, the existing church will remain on the subject lands as part of the proposed development. Given that the R8 Zone does not permit this existing 'spiritual use', as defined in the Zoning By-law, a Site-Specific Provision to permit the existing 'spiritual use' in the R8 Zone is proposed.

Section 7.8.2 of the Zoning By-law provides direction with respect to the performance standards in the R8 Zone. The following table reviews the details of the proposed development to the R8 Zone performance standards as set out in the Zoning By-law. Regulations shown in **red** below

indicate the Site-Specific Provisions requested as part of the Zoning By-law Amendment Application:

Regulation	R8 Zone Requirement	Proposed Development
Lot Area (minimum)	None	Total: 12,046 m ² Severed Residential lot area: 8,044 m ² Retained Church lot area: 4,002 m ²
Lot Frontage (minimum)	None	-
Common Element Road of Private Road Width (minimum)	6.1 m	6.1 m
Common Element Road or Private Road Setback where driveway is proposed (minimum)	6.0 m	6.0 m
Street Line Setback (minimum)	6.0 m	6.0 m
Interior Lot Line Setback (minimum)	7.5 m	7.5 m
Rear Yard Setback (minimum)	7.5 m	7.5 m
Building Separation (residential – minimum)	2.4 m	3.3 m
Building Separation (non- residential – minimum)	6.0 m	8.7 m
Building Height (maximum)	10 m	12 m
Density (maximum)	150 bedrooms per hectare	143 bedrooms per hectare
Lot Coverage (maximum)	45%	23%
Landscaped Open Space (minimum)	30%	47%
Parking	Requirement	Proposed Development
Townhouse		
Parking Spaces (minimum)	1 space / unit = 15 spaces	15 spaces
Visitor Parking Spaces (minimum)	0.33 space / unit = 5	0 spaces (to be shared with Spiritual Use)
Stacked Townhouse (Walk-Up)		
Parking Spaces (minimum)	1 space / unit = 42 spaces	42 spaces
Visitor Parking Spaces (minimum)	0.10 space / unit = 5	0 spaces (to be shared with Spiritual Use)
Spiritual Use		
Parking Spaces (minimum)	8 spaces / 100 sq. m = 58 spaces	35 spaces
Accessible Parking Spaces (minimum)	2 Type A 2 Type B	2 Type A 2 Type B

EV-Ready Parking Spaces (minimum)	85-119 spaces required = 3 spaces	3 spaces
Bicycle Parking – Residential	Type A: 0.3 per dwelling unit = 18 spaces Type B: 0.3 per dwelling unit = 18 spaces	40 spaces (18 Type A and 22 Type B)
Bicycle Parking – Non-Residential	10% of required motor vehicle parking = 4 spaces	6 spaces (Type B)

Based on the table above, the following Site-Specific Provisions would be required to the proposed R8 Zone:

- Permit a Maximum Height of 12 metres, whereas the Zoning By-law requires a Maximum Height of 10 metres;
- Permit a Minimum of 35 parking spaces to allow for shared parking between visitor and *spiritual use* parking, whereas the Zoning By-law requires a Minimum of 68 spaces (10 for visitor and 58 for *spiritual use*); and,
- Permit *spiritual use* as an additional permitted use to allow for the continued use of the church on the premises as a legal use.

6. LAND USE PLANNING RATIONALE

This section of the Report builds on the previous sections and provides land use planning opinion with regards to the site-specific planning regulations proposed to accommodate the contemplated development. These site-specific requests include modifications to building height, density, podium height, and landscaped open space requirements. Each requested provision has been carefully considered in relation to the PPS, the Region of Waterloo Official Plan, and the City of Waterloo Official Plan, including the recently adopted OPA 58.

a. Rezoning to R8

As discussed previously, the subject property is currently zoned R1. By way of the proposed Zoning By-law Amendment application, the applicant is proposing the site be zoned R8. In consideration of the appropriateness of R8 zoning for the site, we have undertaken a review of adjacent and nearby properties in the general area.

As shown on Figure 31 below, properties to the south of Lexington Road have experienced density increases in recent years. Directly across from the subject property, 215 Lexington Road is a retirement building, a high-density development within the area. To the rear of 215 Lexington Road lies a townhouse complex zoned R8, indicating existing forms of similar development to the proposed townhouse development on the subject property.

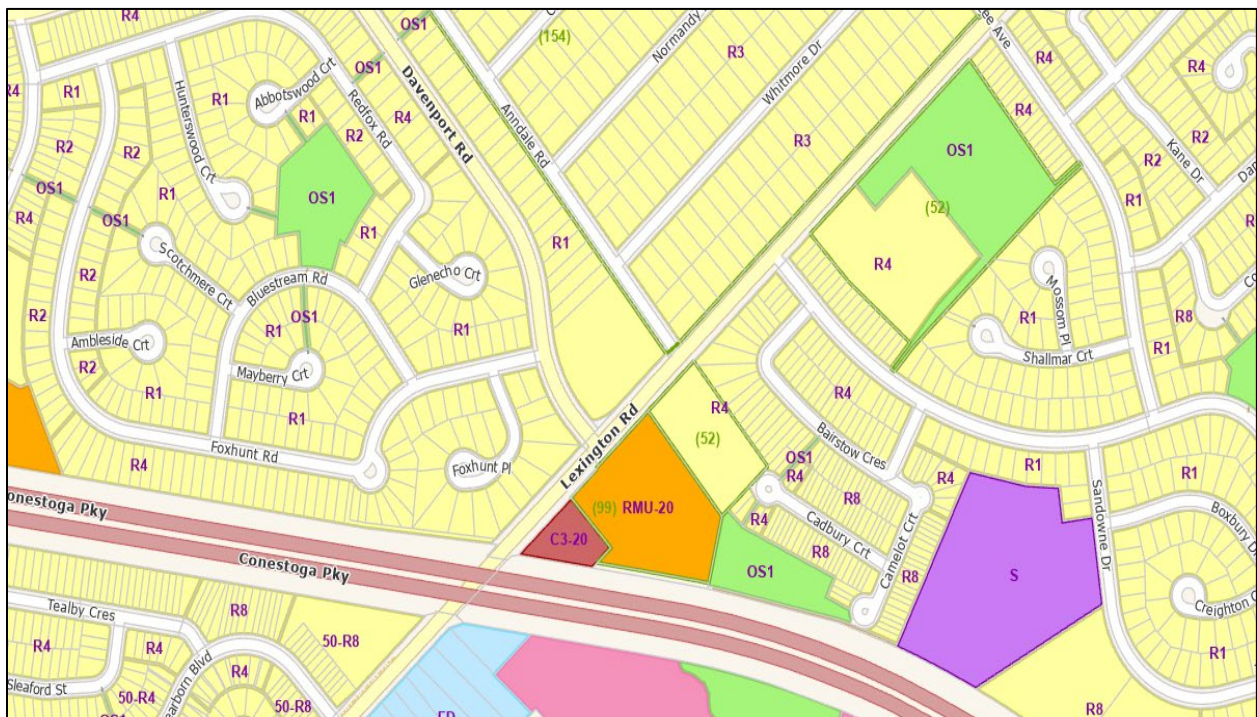


Figure 31: Zoning Context (Source: City of Waterloo, Zoning By-law Interactive Map)

b. Maximum Building Height

The Zoning By-law currently permits a maximum building height of 10 metres within the existing R1 zone. The applicant is requesting a modest increase in maximum permitted height to 12 metres to facilitate the proposed stacked townhouse built form. This increase is minor in nature, representing only a 2.0 metre difference, and is necessary to accommodate the functional design of walk-up stacked townhouse units, which require additional vertical space to ensure efficient internal circulation, liveable unit layouts, and architectural articulation. Likewise, the proposed height conforms to the City's Official Plan which allows for buildings of up to 12 m in height in low rise areas, as discussed previously in this report.

The proposed increase is compatible with the surrounding residential context, maintains an appropriate transition to adjacent low-rise properties to the north, east and west, and supports the City's intensification objectives by providing a broader range of housing options within the urban area. Most notably, the proposed townhouses (Blocks 2 and 3) abutting the low-rise residential property have a rear yard setback of 7.5 metres, which includes a 3.0 metre landscape buffer, in order to mitigate concerns of overlook or privacy.

The requested height provision therefore represents an appropriate and measured response to the design requirements of contemporary townhouse development, while remaining consistent with the built form envisioned for medium-density residential uses.

c. Approach to Parking

The Zoning By-law requires a minimum of 68 parking spaces, comprised of 10 spaces for visitor parking associated with the residential component and 58 spaces for the existing church. The applicant is requesting to permit a reduced minimum of 35 parking spaces by implementing a shared parking arrangement between the residential visitor component and the church use. A total of 57 resident parking spaces will be provided (one space per dwelling unit), in addition to the 35 shared visitor/church spaces, four barrier-free spaces, and three EV-ready spaces.

The intent of the shared parking approach is to balance supply and demand by maximizing utilization throughout the week. Residential visitor demand is generally highest during daytime hours when church parking demand is at its lowest, while church demand typically peaks during evenings and weekends when residential visitor needs are reduced. This pattern ensures that sufficient parking is available to meet the functional needs of both uses without oversupplying parking, thereby supporting the City's objectives for efficient land use, reduced hardscaping, and enhanced urban design.

The Transportation Impact Study prepared by BA Group also analyzed the parking demand and the feasibility of the shared non-residential parking arrangement. Based on their assessment, it was determined that the proposed non-residential car parking supply of 35 spaces is sufficient to satisfy the estimated combined residential visitor and church peak parking demands both during and outside of Sunday service. In this regard, the requested reduction reflects a coordinated, context-sensitive parking strategy that appropriately balances the needs of both uses.

d. Spiritual Use as a Permitted Use

The applicant is also requesting that the existing church (spiritual use) be recognized as a permitted use within the rezoned Residential Eight (R8) zone. This provision is necessary to ensure that the ongoing operation of the church is legally permitted following the proposed redevelopment and future severance of the subject property. The church has historically formed an important component of the community fabric, providing both a place of worship and associated institutional functions.

The integration of the church with the proposed townhouse development represents an efficient use of land that maintains the continuity of an established community use while introducing new housing opportunities on underutilized portions of the site. Recognizing the church as a permitted use is consistent with the PPS and the City's Official Plan objectives of supporting a mix of uses, promoting complete communities, and accommodating institutional functions within residential neighbourhoods. This site-specific provision ensures that both the church and residential uses can coexist and operate in a compatible and coordinated manner moving forward.

7. URBAN DESIGN REVIEW

This section of the Report provides an assessment of the proposed design within the context of the City of Waterloo's urban design framework, as established within the City of Waterloo Official Plan and Urban Design Manual.

a. City of Waterloo Official Plan, Chapter 3.11

Section 3.11 of the Official Plan provides the City's urban design objectives which are discussed in the table below.

Policy Number	Policy	Discussion of Conformity
3.11.1(1)	Intensification	The proposal intensifies the site with compatible low rise forms of housing while respecting surrounding neighbourhood character through step-backs, landscaping, and articulated façades that ensure compatibility.
3.11.1(2)	Character	The proposed architectural design contemplates a mix of high quality building materials, landscaping, and public realm treatments to maintain visual integrity and reinforce local character.
3.11.1(3)	Views and Vistas	Not applicable.
3.11.1(4)	Streetscapes	The proposal will enhance the surrounding streetscape with boulevard planting, street trees, pedestrian-scale lighting, and screening of utilities to support a green, pedestrian-friendly environment.
3.11.1(5)	Existing Site Features	Existing vegetation along the site edge is retained where feasible, with sensitive grading and new planting to integrate with the neighbourhood.
3.11.1(6)	Heritage	The project complements and respects the on-site church building by maintaining compatible scale and design; no heritage resources are adversely impacted.
3.11.1(7)	Open Space	The development integrates landscaped courtyards and amenity spaces that connect to the broader neighbourhood open space network.
3.11.1(8)	Gateways	The building provides a defined entrance feature along Anndale Road, contributing to sense of place at this corner of the neighbourhood.

3.11.1(9)	Landmarks	Distinctive architectural treatments at building entrances and roofline articulation provide visual identity and orientation.
3.11.1(10)	Safety and Security	CPTED principles are applied through natural surveillance, clear sightlines, uniform lighting, and separation of vehicles and pedestrians.
3.11.1(11)	Site Circulation	The site plan prioritizes pedestrians and cyclists through direct sidewalks, bicycle racks, and safe separation from driveways and parking. Access is limited to Anndale for vehicular users to avoid conflicts on Lexington and Davenport.
3.11.1(12)	Transit-Oriented Design	The site is located near transit stops with convenient connections at Conestoga Mall. The site encourages sustainable travel through walkable design and bicycle parking facilities.
3.11.1(13)	Universal Design	Barrier-free access is provided throughout the building and site, including accessible entrances, units, and amenity areas.
3.11.1(14)	Parking	Parking is internalized and screened from the street; spaces are broken into smaller landscaped areas to minimize visual impact.
3.11.1(15)	Site Servicing Areas	Loading and garbage areas are located internally and screened with landscaping and built form to mitigate neighbour impacts. Garbage enclosures have been thoughtfully integrated throughout the site for convenient waste storage for future residents.
3.11.1(16)	Outdoor Lighting	Pedestrian-scale lighting provides safety while minimizing glare and spillover into adjacent residential properties. Lighting will be confirmed at the site plan approval stage.
3.11.1(17)	Signage	Signage is well integrated throughout the site to support wayfinding while minimizing visual clutter. Signage will be confirmed at the site plan approval stage.
3.11.1(18)	Compatible Development	Step-backs, setbacks, and landscape buffers ensure comfort and privacy for neighbouring low-rise dwellings.
3.11.1(19)	Human-Scale Development	The building's height, step-backs, landscaping, and façade articulation reinforce a human-scaled streetscape.
3.11.1(20)	Building Design	The design features articulated façades, durable materials, and consistent detailing on all sides.

3.11.1(21)	Accessory Structures	Not applicable / not proposed.
3.11.1(22)	Landscape Design	The proposed landscape design integrates soft and hardscape elements, providing shade, screening, and high-quality outdoor amenity space. Detailed landscaping will be confirmed at the site plan approval stage.
3.11.1(23)	Site Amenities	Outdoor amenity areas include seating, bicycle racks, and shade features to support resident comfort and social interaction.
3.11.1(24)	Sustainable Design	The project will incorporate native plantings, energy-efficient building design, and opportunities for passive solar access.
3.11.1(25)	Public Art and Culture	The project supports placemaking opportunities through integrated landscape features and potential for small-scale public art near entrances.
3.11.1(26)	Innovation and Creativity	The design uses creative articulation, courtyard layouts, and integrated materials while maintaining neighbourhood compatibility.
3.11.1(27)	Utilities	Utilities are located away from the street, clustered where possible, and screened with landscaping.
3.11.1(28)	Wayfinding	Entrances are clearly visible from Anndale Road with signage and pathways ensuring intuitive wayfinding.
3.11.1(29)	Priority	The project emphasizes high-quality urban design, compatibility, and public realm improvements as priorities alongside intensification.
3.11.2(1)	Connectivity	The project emphasizes walkability with direct pedestrian access from Anndale Road, barrier-free entrances, bicycle facilities, and clear connections to nearby transit.
3.11.2(2)	Interest	The building incorporates façade articulation, balconies, and landscaped courtyards to create visual interest and active, engaging spaces.
3.11.2(3)	Public Art	Opportunities for integrated public art and distinctive landscape elements are provided at key entrances to contribute to neighbourhood character.
3.11.2(4)	Infill Development	The proposed development is of a complementary scale that fits proportionately on the lot and uses step-backs, materials, and landscaping to harmonize with surrounding context.
3.11.2(5)	Building Design	The principal façade and entrance face the surrounding

		roads, with articulated elevations that support a coordinated and high-quality streetscape.
3.11.2(6)	Built Form and Massing	The building placement frames the surrounding roads with appropriate street enclosure, step-backs to reduce bulk, and attention to minimizing wind, shadow, and overlook impacts.
3.11.2(7)	Skyline	The varied roofline and integrated rooftop screening contribute to an attractive skyline when viewed from surrounding streets.
3.11.2(8)	Site Amenities	Landscaped courtyards, bicycle parking, and seating areas provide high-quality amenities for residents. Landscaping and programming of the common amenity space will be confirmed at the site plan approval stage.

Based on the foregoing, it is our opinion that the proposed design conforms with the City of Waterloo's urban design policies of the Official Plan.

b. City of Waterloo Urban Design Manual

The City of Waterloo is committed to a high standard of urban design as an established through the City's Official Plan policies, its urban design guidelines and investment in the public realm. At the broadest level, the City's Urban Design Policies establish the primary design objectives and priorities for the City, which in turn, are to be further defined and implemented through City design guidelines.

i. General Guidelines

The City's Urban Design Manual sets out general guidelines for city-wide development located in public and private realm. These guidelines are intended to guide many types of development in the City and may be enhanced by more detailed design guidelines provided in the Manual, other City guidelines and project design guidelines. The following table outlines general guidelines from the Urban Design Manual (Part 2) that are applicable to the design of the proposed development:

Policy Number	Policy	Design Adherence
2.1.1	Pedestrian-Friendly Design	The proposed development provides direct, grade-related access from Anndale Road with a clearly defined entrance. Pedestrian access is also proposed along Lexington Road and Davenport Road. Streetscape improvements include landscaping, boulevard trees, and pedestrian-scale lighting, which will be confirmed during the site plan approval stage. The building massing avoids abrupt grade changes and integrates transitions between the public sidewalk and private realm.

		Parking and servicing are located internally, minimizing automobile impacts and emphasizing pedestrian safety.
2.1.2	Human-Scale Development	The development respects the surrounding neighbourhood through varied heights / rooflines at upper floors and articulated facades to break down massing. Entrances are proportionate to the building and street frontage, while landscaped setbacks soften the transition to the public realm. Pedestrian-scale lighting and street trees enhance comfort and human scale.
2.1.3	Compatible Development	Landscaping and setbacks provide a thoughtful transition to adjacent to low-rise residential properties. Parking, loading, and waste collection are screened from view and located away from sensitive residential edges. Massing and step-backs mitigate overlook and shadowing, while high-quality complementary materials ensure compatibility with surrounding homes.
2.1.4	Safety and Security	Crime Prevention Through Environmental Design (CPTED) principles are applied through natural surveillance from units facing the public and private roads, as well as the common amenity area. Entrances and walkways will be lit with uniform pedestrian-scale lighting, avoiding entrapment areas and ensuring visibility. The Lighting Plan will be confirmed at the site plan approval stage. Clear sightlines to parking and open spaces enhance safety, and vehicular access is separated to minimize conflicts with pedestrians.
2.1.5	Transit-Oriented Design	The site is within walking distance of local bus routes, supporting intensification near transit. Direct pedestrian connections to transit are provided, and bicycle racks will encourage active transportation. Building entrances are oriented close to the public sidewalk for convenient transit access.
2.1.6	Building Design	The building incorporates articulated facades, variation in rooflines, balconies, and high-quality durable materials. Step-backs and expressive corner treatments contribute to visual interest. Entrances are designed as focal points with weather protection. All elevations maintain consistent detailing, and mechanical systems are integrated to avoid visual clutter. The design supports energy efficiency and incorporates green building principles.
2.1.7	Amenity Areas	A central outdoor amenity space is provided for residents, that is universally accessible, supports social interaction, and designed

		to be visible from the proposed dwellings to promote safety and activity.
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Based on the foregoing, it is our opinion that the proposed design aligns with and meets the overall intent of the City of Waterloo's Urban Design Guidelines.

9. SUPPORTING STUDIES

This section of the Report outlines the supporting studies conducted as part of the complete application package for the proposed Zoning By-Law Amendment Application. The following table summarizes the supporting study or report, the party who completed the study, and the date of study completion.

Supporting Study	Name of Party	Date Completed
Road Traffic and Stationary Noise Impact Study	JJ Acoustic Engineering Ltd.	August 21, 2025
Transportation Impact Study	BA Group	August 21, 2025
Functional Servicing & Stormwater Management Report	Arcadis Professional Services Inc.	September 19, 2025
Arborist Report	Davey Resource Group	September 12, 2025

In the subsections below, a summary of each study, report, or assessment is provided, including key findings or conclusions of each report.

a. Road Traffic and Stationary Noise Impact Study

A Road Traffic and Stationary Noise Impact Study ('Noise Study') was prepared by JJ Acoustic Engineering Ltd., August 21, 2025, as part of the complete application submission. The Noise Study confirms that the proposed development can achieve compliance with the MECP noise guidelines based on a series of recommendations for each of the five (5) townhouse blocks. With the inclusion of central air conditioning for select units, appropriate façade construction, and standard warning clauses in purchase and lease agreements, the development will provide a suitable acoustic environment for future residents. No significant mitigation measures are required, and the study supports that the site is appropriate for residential and institutional uses from a noise perspective.

b. Transportation Impact Study

A Transportation Impact Study ('TIS') was prepared by BA Group, August 21, 2025, as part of the complete application submission. The TIS assesses the impacts of the proposed residential and church uses on the surrounding transportation network, including traffic operations, parking supply, loading, and active transportation connections. The study concluded that the proposed development would have negligible impact on the surrounding road network, with site-generated traffic volumes well within the capacity of existing infrastructure.

With respect to parking, the proposed supply of 92 vehicular spaces (57 resident, 35 shared visitor/church) and 46 bicycle parking spaces meets the expected needs of the development to adequately serve residents, visitors and church users. A Type 'A' loading space has also been provided to accommodate moving and deliveries.

No traffic safety or operational concerns were identified as a result of the proposed development. Accordingly, the TIS did not identify the need for any roadway or intersection improvements to accommodate the proposed development.

In summary, the TIS supports the conclusion that the proposed development can be accommodated by the existing transportation system, provides sufficient parking and loading, and contributes to a multimodal transportation network.

c. Functional Servicing and Stormwater Management Report

A Functional Servicing and Stormwater Management Report ('FSR/SWM') was prepared by Arcadis Professional Services Inc. (September 19, 2025), as part of the complete application submission. The Report provides a comprehensive servicing strategy addressing stormwater management, sanitary discharge, and water supply for the proposed development.

With respect to stormwater management, the analysis confirms that post-development flows will be controlled to pre-development levels through an underground storage system providing 374 m³ of storage capacity. Flow control structures, including 190 mm and 325 mm orifice plates, will ensure appropriate release rates to the municipal storm sewer on Anndale Road, operating at just 60% of full flow capacity. A combination of infiltration facilities and oil/grit separator (OGS) units, supplemented by a Stormceptor device, will provide Enhanced (Level 1) Protection with total suspended solids (TSS) removal exceeding 80%, consistent with Ministry of the Environment, Conservation and Parks (MECP) standards. A water balance strategy has also been incorporated, with infiltration and retention measures addressing the identified annual recharge deficit, thereby meeting City of Waterloo water balance criteria.

For sanitary servicing, the existing 250 mm sanitary sewer on Anndale Road has sufficient capacity to accommodate the proposed residential development. Post-development flows are estimated at 2.1 L/s, representing only 4.3% of the sewer's full flow capacity. The existing Christ Lutheran Church will maintain its sanitary service to Lexington Road, with no negative impact on municipal infrastructure.

In terms of water servicing, the development will be connected to the existing 300 mm watermain on Anndale Road via a new 200 mm service. Domestic water demands for the 57 townhouse units are modest, with a maximum day demand of 0.84 L/s and a peak hour demand of 1.26 L/s, well within the available capacity of the existing system. A fire flow analysis confirms that the available supply meets the required fire flow demand, and hydrant coverage has been demonstrated through both existing municipal hydrants and proposed on-site hydrants. The retained church will continue to be serviced from its existing Lexington Road connection.

The FSR/SWM concludes that the proposed townhouse development can be fully accommodated by existing municipal infrastructure without the need for downstream upgrades. The report confirms that the servicing strategy meets all relevant City of Waterloo and Region of Waterloo design standards, ensures adequate stormwater quantity and quality control, and provides reliable sanitary and water servicing. Accordingly, the findings of the FSR/SWM support the conclusion that the proposed development is technically feasible, does not create servicing

constraints, and represents appropriate and sustainable intensification within the existing municipal servicing framework.

d. Arborist Report

An Arborist Report and Pre-Construction Tree Assessment was prepared by Davey Resource Group (September 12, 2025) as part of the complete application submission. The purpose of the assessment was to inventory and evaluate trees on and adjacent to the site, determine their condition and potential impacts from construction, and provide recommendations for preservation, removal, and replacement in accordance with municipal policy and best arboricultural practices.

The inventory identified 51 trees within or near the development area. Of these, 29 trees were in good condition, 17 in fair condition, 2 in poor condition, and 3 dead or dying. To accommodate the proposed development, 34 trees are recommended for removal, including both privately-owned and site-edge trees. Several removals are exempt from permitting requirements, including small-diameter trees under 15 cm DBH, a stump (#13), and two trees in poor or declining condition (#352, #354).

A further 5 trees are anticipated to be injured by construction works, primarily from driveway and servicing conflicts. For these, low-impact excavation methods such as hydro-vac or air spade will be required, along with arborist supervision and root pruning to minimize stress and ensure survivability.

11 trees are recommended for preservation, including a cluster of City-owned trees (#14–20) which must be retained and fully protected throughout construction. Tree Protection Zones (TPZs) will be established using 1.2 m high Paige wire fencing secured to T-bar posts, and no grading, storage, or construction activity will be permitted within the hoarded areas.

To comply with the City of Waterloo's tree replacement policy, up to 110 replacement trees will be required to offset removals. The client proposes to plant 46 replacement trees on-site, with the remaining balance addressed through cash-in-lieu contributions. Replacement planting will meet City standards (deciduous trees minimum 50 mm caliper; coniferous trees minimum 1.5 m height) and be subject to a two-year maintenance program, including watering, staking, and establishment care.

The Arborist Report concludes that the proposed development can proceed while appropriately balancing tree removals with new plantings, maintaining City-owned trees, and implementing strict protection measures for retained specimens. The recommended mitigation strategy ensures compliance with municipal tree management requirements, offsets canopy loss, and supports the long-term sustainability of Waterloo's urban forest. Accordingly, the Arborist Report demonstrates that the proposed development can be implemented while managing tree impacts responsibly, providing a clear framework for removal, protection, and replacement in line with City policies.

10. CONCLUSION

This Report provides an assessment of the proposed development and Zoning By-law Amendment Application for the property known municipally as 445 Anndale Road, which includes a discussion of the existing conditions of the site, its context, the land use planning policy framework applicable to it, land use planning rationale for the development proposed, and review of the applicable urban design guidelines.

Based on our assessment of the applications, it is our opinion that the proposed Zoning By-law Amendment is justified as it has regard to the “Matters of Provincial Interest” set out in the *Planning Act*, is consistent with the PPS, conforms to the Region of Waterloo Official Plan, and the City of Waterloo Official Plan.

Moreover, it is our opinion that the development provides for context-appropriate intensification, supports the orderly redevelopment of the site and supports the wise use of existing infrastructure. It is our opinion that this application serves the public interest and represents sound land use planning.

Based on the above and the conclusions of this Report, it is our recommendation that the City of Waterloo:

- Deem the Zoning By-law Amendment application complete and process the application in accordance with the municipal process;
- Schedule a Neighbourhood Information Meeting to obtain comments from neighbouring residents and interested parties; and
- Circulate the application to internal departments, technical review agencies, and the community in accordance with city procedures and the *Planning Act*.

Respectfully Submitted,



David Galbraith MCIP RPP

President, UP Consulting



Christian Tsimenidis BES

Senior Planner, UP Consulting

APPENDIX A

THE CORPORATION OF THE CITY OF WATERLOO

DRAFT BY-LAW NUMBER XXXX-2025

Being a By-law to amend Zoning By-law Number 2018-050, as amended, with respect to lands municipally known as 445 Anndale Road, Waterloo.

WHEREAS the Municipal Council of the Corporation of the City of Waterloo deems it appropriate to amend Zoning By-law Number 2018-050, as amended;

AND WHEREAS authority is granted under Section 34 of the Planning Act R.S.O. 1990, c.P.13, as amended;

NOW THEREFORE the Municipal Council of the Corporation of the City of Waterloo enacts as follows:

1. THAT Section 7.8 of Zoning By-law 2018-050, as amended, is hereby further amended by rezoning the lands described as BLK C PL 1453 CITY OF WATERLOO; S/T 640494; WATERLOO, municipally known as 445 Anndale Road, Waterloo and identified on the attached Schedule 'A', from R1 (Residential One) to R8-XX (Residential Eight – Site Specific).

-
2. THAT Section 7.8 of By-law 2018-050 is hereby amended by adding the following subsection:

7.8.X – R8-XX (445 Anndale Road)

Notwithstanding the regulations of the R8 zone, the following site-specific provisions shall apply to the lands zoned R8-XX:

- a) In addition to the provisions of the R8 zone, the following provisions shall be applicable:
 - Building Height (Maximum): 12.0 metres;
 - Shared Parking (Minimum): 35 spaces provided for the visitor and *Spiritual Uses*
 - Additional Use(s): *Spiritual Use*
- b) All other regulations of the R8 zone shall continue to apply.

-
3. THAT Schedule 'A', attached to and forming part of this By-law, shall show the area to which this By-law applies.

-
4. THAT this By-law shall come into force and take effect on the date it is passed by Council, subject to the applicable provisions of the Planning Act, R.S.O. 1990, c. P.13, as amended.

READ a first and second time this _____ day of _____, 2025.

READ a third time and finally passed this _____ day of _____, 2025.