PLANNING JUSTIFICATION & URBAN DESIGN REPORT

41 WESTHILL DRIVE, WATERLOO

Zoning By-Law Amendment Application

up consulting



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 property municipally known as 41 Westhill Drive, Waterloo ("Subject Lands", "Subject Property", or "Site").

As discussed in this Report, the Region of Waterloo, is proposing to develop a 6-storey residential building consisting of 56 dwelling units. In order to permit the development, a Zoning By-Law Amendment is proposed to rezone the subject property from Residential Nine ('R9') to Residential Mixed Use-20 ('RMU-20') and establish Site-Specific Provisions pertaining to the reduction of the minimum rear yard setback and parking ratio.

This project is being advanced as part of the Region's "Building Better Futures Initiative". The Region intends to advance the development with a development partner, to bring forward a mixed-income residential development supporting a minimum of 30% of the units being at, or below, an affordable rental rate (80% median market). In the long-term, it is not anticipated that the Region will construct, own or manage the ultimate development on the site, but rather will issue a Request for Proposal for a development partner to build out the site with criteria requiring 30% of the units be affordable for a term not less than 30 years. To support this initiative, the Region of Waterloo will be seeking proposals for the acquisition of the subject property to develop mixed-income housing units.

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.

up consulting

TABLE OF CONTENTS

1. INTRODUCTION 1
2. SITE DESCRIPTION 3
3. CONTEXT ANALYSIS 6
4. OVERVIEW OF PROPOSED DEVELOPMENT 8
   a) Typical Floor Plans 9
   b) Conceptual Massing Model 12
5. REQUESTED LAND USE PLANNING APPROVALS 14
6. LAND USE PLANNING FRAMEWORK 15
   a) Planning Act 15
      i. Matters of Provincial Interest 15
   b) Provincial Planning Statement (2024) 17
   c) Region of Waterloo Official Plan 23
      i. Urban Area and Urban Designated Greenfield Area 23
      ii. Source Water Protection 29
   d) City of Waterloo Official Plan 30
      i. Land Use Designation - Mixed-Use Medium Density Residential 30
      ii. Height and Density - Medium Density, 20 metres 31
      iii. Nodes and Corridors – Minor Node 32
      iv. Source Water Protection Area 36
      v. Urban Design 36
   e) City of Waterloo Official Plan Amendment No.58 36
      i. Land Use Designation – Medium Rise Residential 36
      ii. Built Form – Medium Rise, 6 Storeys 37
      iii. Nodes and Corridors – Minor Node 38
   f) City of Waterloo Zoning By-Law 2018-050 39
7. LAND USE PLANNING RATIONALE 44
   a) Alignment with Overarching Planning Framework 44
   b) Efficient Use of Infrastructure and Municipal Servicing 44
   c) Appropriate Massing, Built Form, and Density in a Minor Node 45
   d) Reduced Minimum Parking Ratio 45
   e) Reduced Minimum Rear Yard Setback 46
8. URBAN DESIGN REVIEW 47
   a) City of Waterloo Official Plan 47

i. General Urban Design Policies 49
ii. Urban Design within Nodes and Corridors 56
b) City of Waterloo Urban Design Manual 58
i. Part 2 – General City Design Guidelines 58
ii. Part 3 – Supplementary Design Guidelines 60
9. SUPPORTING STUDIES 63
a) Transportation Impact Brief 63
b) Functional Servicing and Stormwater Management Report 63
c) Environmental Noise Study 64
d) Stage 1 and 2 Archaeological Assessment 64
10. PUBLIC CONSULTATION STRATEGY 66
11. CONCLUSION 67
APPENDIX A 68

TABLE OF FIGURES

Figure 1: Location of Subject Property (Source: Region of Waterloo GIS Portal) 3
Figure 2: Streetview of the Subject Property from Westhill Hill Drive Facing West (Source: Google Maps) 4
Figure 3: Streetview of the Subject Property from Ira Needle Boulevard Facing East (Source: Google Maps) 4
Figure 4: Streetview of the Subject Property from the intersection of Westhill Drive and Ira Needle Boulevard Facing North (Source: Google Maps) 5
Figure 5: Neighbourhood Context Map (Source: Region of Waterloo GIS Portal) 7
Figure 6: Conceptual Site Plan (Source: McCallum Sather) 8
Figure 7: Level 1 Floor Plan – Preliminary Design (Source: McCallum Sather) 10
Figure 8: Level 2 Floor Plan – Preliminary Design (Source: McCallum Sather) 11
Figure 9: Level 3-6 Floor Plan – Preliminary Design (Source: McCallum Sather) 12
Figure 10: Preliminary Massing Model of Proposed Development with View from the East (Source: McCallum Sather) 13
Figure 11: Region of Waterloo Official Plan – Map 2 (Urban System) with the Subject Property indicated with Red Star 24
Figure 12: Region of Waterloo Official Plan – Map 6a (Urban Area Source Water Protection Areas) with the Subject Property indicated with Red Star 29
Figure 13: City of Waterloo Official Plan – Schedule A (Land Use Plan) 30
Figure 14: City of Waterloo Official Plan – Schedule B1 (Height and Density) 31
Figure 15: City of Waterloo Official Plan – Schedule B (City Structure) 32

Figure 16: Official Plan Amendment No.58 - Adopted Schedule 'A' (Land Use Plan) with the Subject Property indicated with Red Star 37
Figure 17: Official Plan Amendment No.58 - Adopted Schedule 'B1' (Built Form) with the Subject Property indicated with Red Star 38
Figure 18: Official Plan Amendment No.58 - Adopted Schedule 'B' (City Structure) with the Subject Property indicated with Red Star 39
Figure 19: City of Waterloo Interactive Zoning By-law Map 39

1. INTRODUCTION

This Report has been prepared as part of the complete Zoning By-Law Amendment application for the proposed development of a 6-storey, 56 dwelling units affordable housing project on the property municipally known as 41 Westhill Drive, Waterloo.

As discussed in this Report, the Region of Waterloo, is proposing to develop a 6-storey residential building consisting of 56 dwelling units. The proposed development contemplates a mix of 47 one-bedroom units and 9 two-bedroom units, however, the final unit mix will be confirmed at a future stage in the development process. A total of 48 parking spaces will be provided for the proposed development across both surface and structured parking (24 surface, 24 structured).

In order to permit the proposed development, Zoning By-law Amendment is required. The applicant is proposing to rezone the subject property from Residential Nine ('R9') to Residential Mixed Use-20 ('RMU-20') with the following Site-Specific Provisions:

- Permit a minimum of rear yard setback of 5.0 metres, whereas the Zoning By-law requires a minimum of 7.5 metres; and,
- Permit a minimum of parking ratio of 0.75 spaces per dwelling units, whereas the Zoning By-law requires a minimum of 0.90 spaces per dwelling unit.

This project is being advanced as part of the Region's "Building Better Futures Initiative". The intent of the current proposal is to maximize the development potential of the Subject Lands in an effort to create a viable site for a development partner, working with the Region of Waterloo, to bring forward a mixed-income residential development supporting a minimum of 30% of the units being at, or below, an affordable rental rate (80% median market). It is not anticipated that the Region will construct, own or manage the ultimate development on the site, but rather will issue a Request for Proposal for a development partner to build out the site with criteria requiring 30% of the units be affordable for a term not less than 30 years. To support this initiative, the Region of Waterloo will be seeking proposals for the acquisition of the subject property to develop mixed-income housing units.

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 DESCRIPTION

The subject property is municipally addressed as 41 Westhill Drive, Waterloo and known legally as GERMAN COMPANY TRACT Part Lot 40 RP 58R14437 Parts 5 and 6. The location of the subject property is shown on Figure 1 below.



Figure 1: *Location of Subject Property (Source: Region of Waterloo GIS Portal)*

The subject property has an approximate total area of 2,835 square metres (0.28 ha), with dual frontages including 70 metres onto Westhill Drive and 95 metres onto Ira Needles Boulevard. The subject property is currently vacant, with limited tree cover and is currently owned by the Region of Waterloo. Images of the existing site are shown in Figures 2 through 4 below.



Figure 2: *Streetview of the Subject Property from Westhill Hill Drive Facing West (Source: Google Maps)*



Figure 3: *Streetview of the Subject Property from Ira Needle Boulevard Facing East (Source: Google Maps)*



Figure 4: *Streetview of the Subject Property from the intersection of Westhill Drive and Ira Needle Boulevard Facing North (Source: Google Maps)*

3. CONTEXT ANALYSIS

The subject property is situated within the Westvale neighbourhood of Waterloo, generally bounded by Ira Needles Boulevard, University Avenue West, Erb Street West, and Fischer-Hallman Road. The area is primarily developed with low-density residential uses, with pockets of medium-density housing concentrated along the outer edges of the neighbourhood, predominately near the intersection of Ira Needles Blvd and Erb Street West.

Directly north of the subject property a 5-storey retirement building (known as the Westhill Retirement Residence) at 7 Westhill Drive, as well as an 11-storey apartment building at 25 Westhill Drive, which is directly connected to the retirement building. Along Westhill Drive also exists a 4-storey mid-rise apartment building on 28 Westhill Drive. Further, a mixed-use development currently under construction is located at 635 Erb Street West and 12 Westhill Drive, which will consist of two (2) apartment buildings and stacked townhouses.

To the east of the lands is 36 Westhill Drive which contains a single-detached dwelling and open space. It is understood that an Official Plan Amendment and Zoning By-law Amendment was submitted in August 2025, whereby the applicant is proposing two (2) residential apartment buildings. Within this development proposal, ‘Building A’ proposes a six (6) storey building and ‘Building B’ proposes an eight (8) storey building. A total of 140 dwelling units are proposed on this adjacent site. Further east, beyond 36 Westhill Drive, is an established low-rise residential neighbourhood consisting of single detached dwellings.

To the west, the site is within walking distance of several commercial and retail destinations, including West Quarter Plaza, Westside Marketplace Plaza, Waterloo Commons Plaza, and the regional commercial centre at Erb Street West and Ira Needles Blvd, which accommodates a range of major retail and service uses. The public realm includes sidewalks along collector roads, street lighting, and landscaped boulevards, supporting pedestrian circulation and a pleasant streetscape environment.

To the south along Ira Needles Blvd., The Boardwalk contains additional regional shopping destinations, dining, and entertainment amenities. Badlands Golf is situated just west of the site, providing a local recreational use. Furthermore, there are several parks and trails located within close proximity to the site, including West Wind Park to the southeast, McCrae Park northeast of the property, and Westvale Park east of the property.

The subject property is well served by public transit. It is within a 6-minute walk to a bus stop for three (3) Grand River Transit (GRT) bus routes: 13 (Laurelwood), 29 (Keats-University), and 202 (iXpress University). The routes provide direct links to several points of interest in the City of Waterloo and Kitchener, including the University of Waterloo, Laurier University, Boardwalk Station and Conestoga Station.

Figure 5 below provides aerial imagery of the existing buildings, parks, and points of interest located within close proximity to the subject property.



Figure 5: *Neighbourhood Context Map (Source: Region of Waterloo GIS Portal)*

4. OVERVIEW OF PROPOSED DEVELOPMENT

As shown on the Site Plan prepared by McCallum Sather below, the applicant is proposing to develop a 6-storey residential building consisting of 56 dwelling units (Figure 6). The proposed development contemplates a mix of 47 one-bedroom units and 9 two-bedroom units. It is noted that the final unit mix may differ from this proposal and will be confirmed at a future stage in the development process.

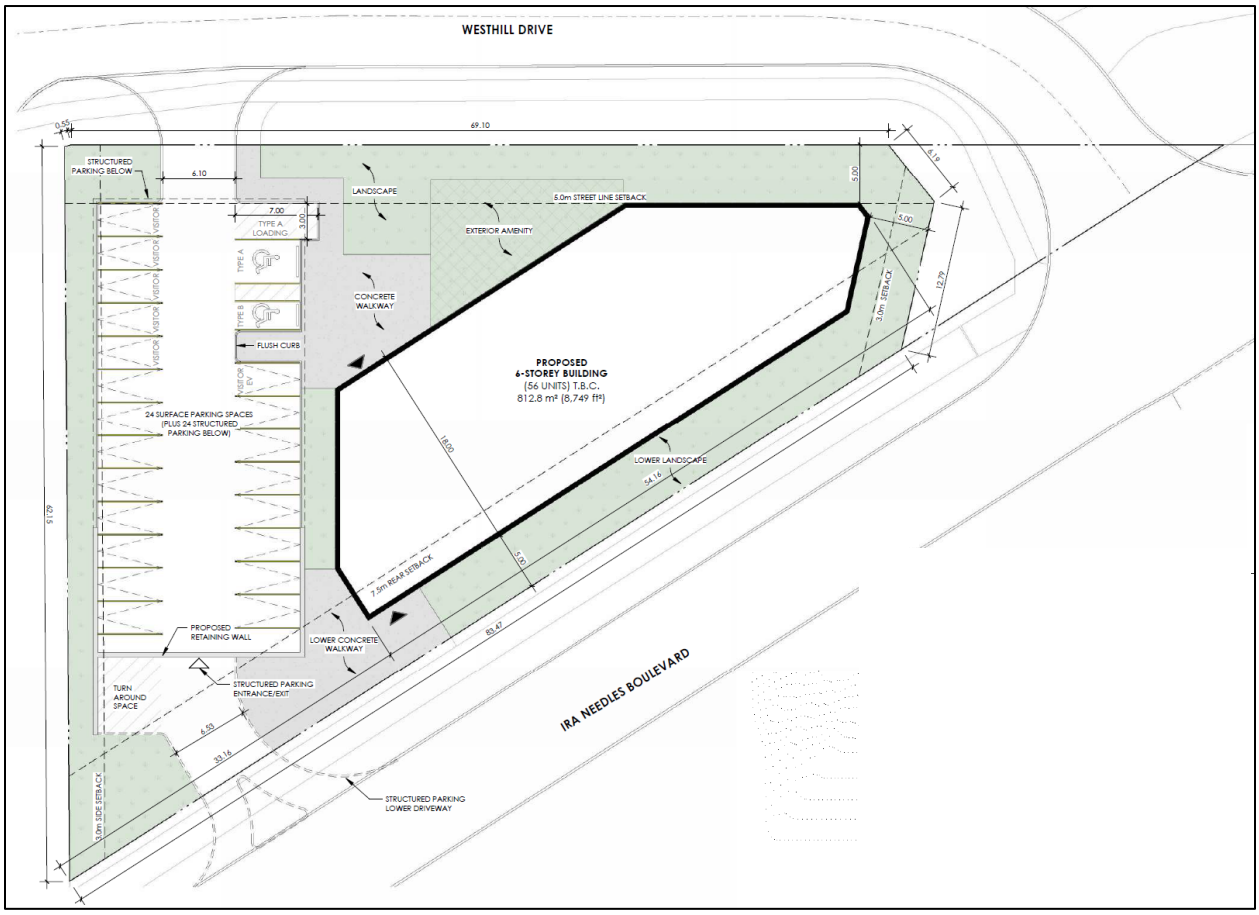

Figure 6: *Conceptual Site Plan (Source: McCallum Sather)*

This project is being advanced as part of the Region's "Building Better Futures Initiative". The intent of the current proposal is to maximize the development potential of the Subject Lands in an effort to create a viable site for a development partner, working with the Region of Waterloo, to bring forward a mixed-income residential development supporting a minimum of 30% of the units being at, or below, an affordable rental rate (80% median market). It is not anticipated that the Region will construct, own or manage the ultimate development on the site, but rather will issue a Request for Proposal for a development partner to build out the site with criteria requiring 30% of the units be affordable for a term not less than 30 years. To support this initiative, the Region of Waterloo will be seeking proposals for the acquisition of 41 Westhill Drive to develop mixed-income housing units.

A total of 48 parking spaces are proposed to be provided for the development including both surface and structured parking (24 surface, 24 structured). A total of 42 spaces will be allocated to the dwelling units (0.75 spaces per dwelling unit), while the remaining 6 spaces will be provided for visitor parking (0.1 space per unit). The surface level parking will be accessed via Westhill Drive, while the structured parking will be accessed via Ira Needles Blvd due to the natural grade of the subject property, sloping down from east to west. A total of three (3) accessible parking spaces (1 Type A and 2 Type B) are provided for the proposed development. These spaces are located closest to the building for ease of access. One (1) Type A loading space is also provided on the surface level parking area.

It is understood the City of Waterloo recently approved a housekeeping amendment to Zoning By-law 2018-050 (Z-25-09), introducing a series of updates to modernize and simplify parking regulations. The amendments include broad reductions to residential and non-residential parking requirements, and updates to loading space regulations. The amendment also clarifies parking space dimensions, accessible parking calculations, and includes several general housekeeping refinements related to parking provisions. As such, this application reflects these recent changes, with the updated regulations included in Section 6.f) of this Report.

Further, though bicycle parking has not been determined at this time given the conceptual nature of the development, it is understood that bicycle parking is required at a rate of 0.6 spaces per dwelling units (split between Type A and Type B). Therefore, a total of 34 bicycle parking spaces (17 Type A and 17 Type B) will be to be provided. Ample service, indoor amenity space, and outdoor space is provided on-site to accommodate the required bicycle parking in the future design.

The proposed development provides 100.0 square metres of outdoor amenity space fronting Westhill Drive. 350.0 square metres of indoor amenity space on the ground floor is also provided, with 246.0 square metres of service space located below grade on the ground floor.

a) Typical Floor Plans

Figure 7 below shows the preliminary design of Level 1, which consists of the structured parking, lower lobby, service areas, and amenity spaces for residents. As previously noted, the structured parking will be accessed via Ira Needles Blvd due to the natural grade of the subject property, sloping down from east to west. The lower lobby entrance is also proposed along Ira Needles Blvd. The proposed programming of the amenity and service spaces on Level 1 will be determined through the detailed design stage during the Site Plan and Building Permit Application process.



Figure 7: *Level 1 Floor Plan – Preliminary Design (Source: McCallum Sather)*

Figure 8 below shows the preliminary design of Level 2, which is at-grade with Westhill Drive. Level 2 features the upper level lobby, common amenity area, service area, as well as dwelling units that face Ira Needles Blvd and where the intersection of Ira Needles Blvd and Westhill Drive. The proposed surface level parking is located on this level and is accessible via Westhill Drive. The outdoor amenity space is also proposed on this level facing Westhill Drive. The proposed programming of the amenity and service spaces on Level 2 will be determined through the detailed design stage during the Site Plan and Building Permit Application process.



Figure 8: *Level 2 Floor Plan – Preliminary Design (Source: McCallum Sather)*

Figure 9 below shows the preliminary design of Levels 3 to 6, which consists of the residential dwelling units. As previously mentioned, the unit mix will be confirmed at the detailed design stage.

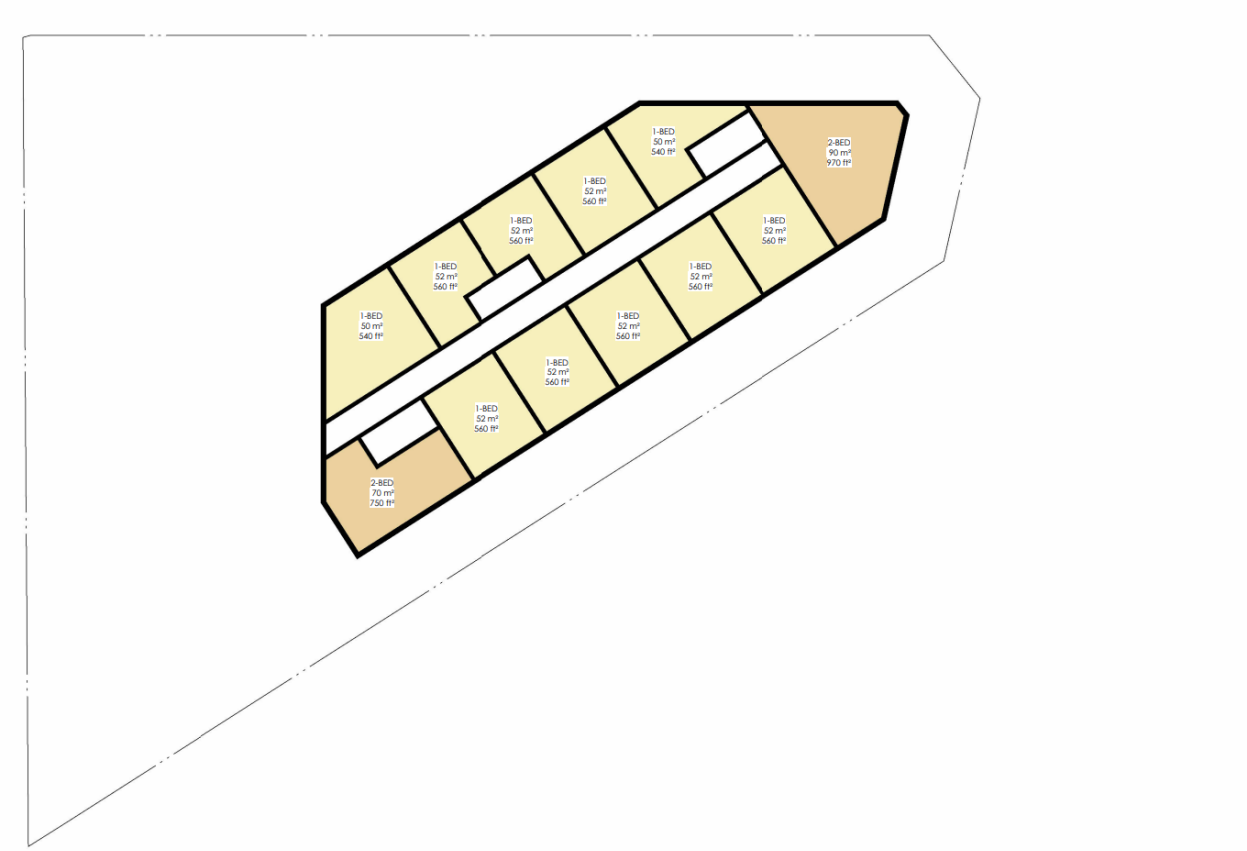

Figure 9: *Level 3-6 Floor Plan – Preliminary Design (Source: McCallum Sather)*

b) Conceptual Massing Model

Figure 10 below shows the preliminary massing model of the proposed development, showing the view from the east along Ira Needles Blvd. The massing model also illustrates the proposed parking arrangement with the surface parking accessed along Westhill Drive, and the structured parking (located directly below the surface parking) accessed along Ira Needles Blvd.

At this stage, the massing model is intended to illustrate a high-level conceptual vision for the proposed development. As the Region of Waterloo plans to seek development proposals for the future acquisition of the site, the detailed architectural design will be further refined through subsequent planning applications and approvals. Accordingly, the current design is intended to provide an indication of the intended scale, massing, and overall built form envisioned for the site. The accompanying architectural package includes a series of reference and precedent images to convey potential architectural expression and materiality, allowing the City and public to better understand the future design intent and development vision, while recognizing that the ultimate design may evolve through future stages of the planning and design process.

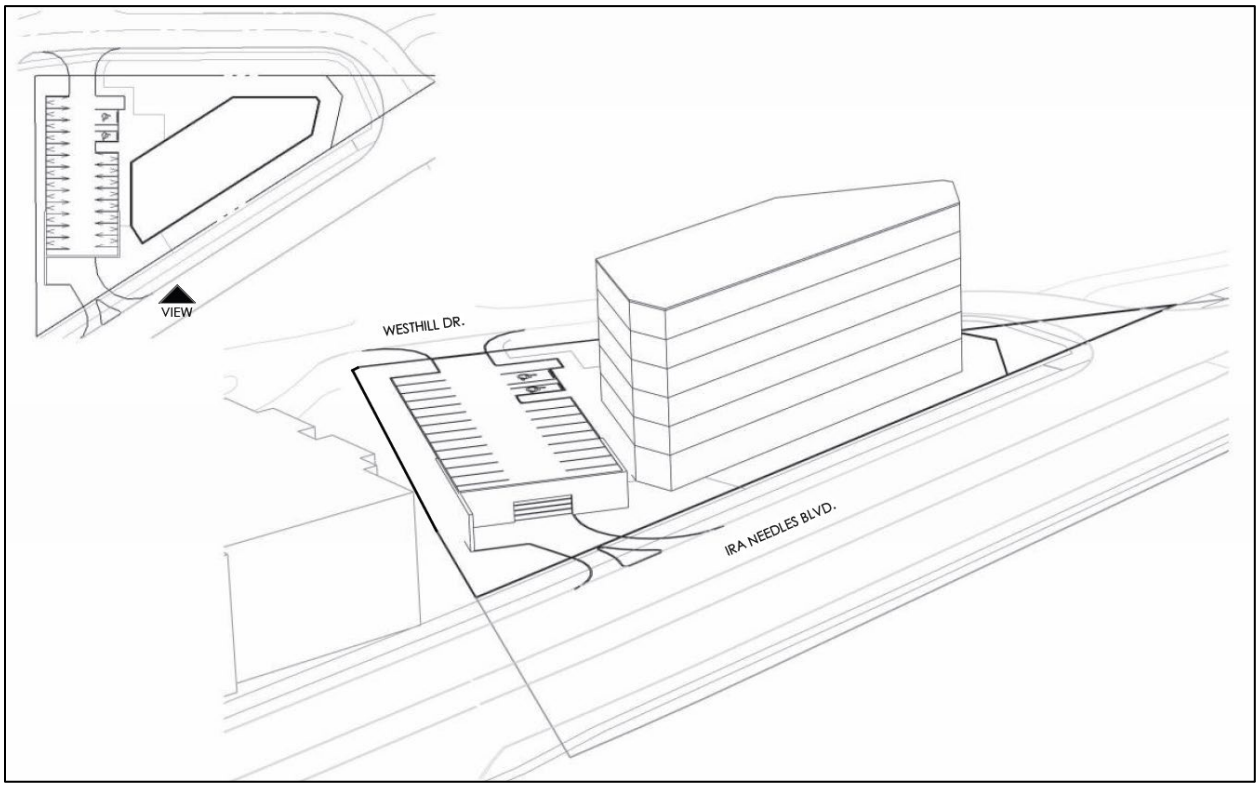

Figure 10: *Preliminary Massing Model of Proposed Development with View from the East (Source: McCallum Sather)*

5. REQUESTED LAND USE PLANNING APPROVALS

In order to permit the proposed development, Zoning By-law Amendment is required. The applicant is proposing to rezone the subject property from Residential Nine ('R9') to Residential Mixed Use-20 ('RMU-20') with the following Site-Specific Provisions. Further, please refer to Appendix 'A' attached to this Report for the Draft By-law outlining the requested provisions.

- Permit a minimum of rear yard setback of 5.0 metres, whereas the Zoning By-law requires a minimum of 7.5 metres; and,
- Permit a minimum of parking ratio of 0.75 spaces per dwelling units, whereas the Zoning By-law requires a minimum of 0.90 spaces per dwelling unit.

6. 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 in the proposed development applications.

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 regards to Official Plans, Zoning By-Laws 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 Policy 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 subject property does not contain any ecological systems or significant natural areas.
The protection of agricultural resources of the Province;	Not applicable. The subject property is not in agricultural use
The conservation / management of natural resources and the mineral resource base;	Not applicable. No mineral or naturally occurring resources are present on the site.
The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	Not applicable. The subject lands do not contain significant architectural, cultural, historical, archaeological or scientific interest.
The supply, efficient use, and conservation of energy and water;	As discussed in the Functional Servicing Report prepared by WalterFedy, the proposed development will connect to existing services and represents the wise 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 to existing communication and physical infrastructure. No new municipal roads will be required to accommodate the proposed development.
The minimization of waste;	Through the site plan and detailed design phases for the development, the applicant will confirm sustainable design elements to be incorporated, which may include low flow plumbing fixtures, energy efficient appliances, and independent monitoring of services tied to units.
The orderly development of safe and healthy communities;	The proposed development will enable the provision of much needed affordable housing units to the City and neighbourhood, supporting the further development of the community. It also supports healthy living by providing outdoor amenity areas and support services within the development.
The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The proposed development will meet or exceed with the standards in the AODA and the Ontario Building Code.
The adequate provision and distribution of educational, health, and recreation;	The proposed development has regard for the adequate provision and distribution of common amenity spaces within the development.
The adequate provision of a full range of housing, including affordable housing;	The proposed development includes a range of one and two-bedroom suites for a mixed-income residential development supporting a minimum of 30% of the units being at, or below, an affordable rental rate (80% median market).
The adequate provision of employment opportunities;	Not applicable.
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, cash-in-lieu of parkland dedication, 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 and city policies and regulations, which have been considered in the proposed application.
The resolution of planning conflicts involving public and private interests;	Not applicable.
The protection of public health and	No adverse impacts to public health or safety are anticipated. The proposed development is not

safety;	anticipated to adverse impacts to public health and safety.
The appropriate location of growth and development;	The proposed development is located within the Region's Urban Area and Designated Greenfield Area designation. The proposed development will help satisfy the Region's density target of growth, as well as supply more affordable housing units to the Region.
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 proposed development supports transit supportive densities and supports the use of active and alternative modes of transportation to and from the site.
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 analysis has been prepared in Section 8 of this Report discussing 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. It is noted that the development concept is preliminary in nature and matters related to urban design will be further considered and confirmed through the eventual site plan approvals process.

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 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	To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: 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 higher-density housing, contributing to a diverse housing market that meets evolving community needs. b) As per the Functional Servicing Report prepared by WalterFedy, the proposed development will connect to existing water, wastewater and sanitary servicing systems.
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, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs; b) improving accessibility for people of all ages and abilities by addressing land use barriers which	a) The proposed development consists of a total of 56 dwelling units, which includes a range of one- and two-bedroom units. b) The proposed development will be designed to meet or exceed the AODA requirements.

	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.	c) Proposing a mixed-income residential development supporting a minimum of 30% of the units being at, or below, an affordable rental rate (80% median market). The Region will issue a Request for Proposal for a development partner to build out the site with criteria requiring 30% of the units be affordable for a term not less than 30 years.
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	a) The proposed development supports the Region's objectives for providing a range of housing options by contributing to the supply of mixed-income housing, including a minimum of 30% affordable rental units, in coordination with the Region's role as Service Manager under the Building Better Futures Initiative. b) i. The proposed development facilitates a diverse range of housing options that address evolving demographic and affordability needs in Waterloo, contributing to social and economic well-being through the provision of new rental housing opportunities. ii. The proposed development facilitates a diverse range of housing options that address evolving demographic and

	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 potential air rights development, in proximity to transit, including corridors and stations.	affordability needs in Waterloo, contributing to social and economic well-being through the provision of new rental housing opportunities. c-d) The proposed development facilitates a diverse range of housing options that address evolving demographic and affordability needs in Waterloo, contributing to social and economic well-being through the provision of new rental housing opportunities.
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's designated settlement area, which the PPS identifies as the primary focus for growth and development. By proposing a six-storey residential building on a fully serviced site, the development supports the concentration of growth in areas where municipal services, public transit, and community amenities are already available, reinforcing efficient use of land and infrastructure while limiting expansion into undeveloped lands beyond the urban boundary.
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;	a) The proposed development introduces a six-storey residential building on an underutilized parcel, optimizing the use of land within the settlement area. By consolidating housing vertically, the project minimizes the footprint

		required for residential growth while supporting sustainable land-use patterns.
	b) optimize existing and planned infrastructure and public service facilities;	b) The site will be fully serviced by municipal water, sanitary, and stormwater infrastructure, and is located near existing parks, schools, and community amenities. By locating higher-density housing in proximity to these established facilities, the development maximizes the efficiency of existing infrastructure and reduces the need for costly extensions or new services.
	c) support active transportation;	c) The development includes pedestrian connections and is within walking distance of nearby parks, retail destinations, and transit stops, promoting walking and cycling as viable transportation options. Its compact design and sidewalk accessibility encourage residents to use active transportation for daily needs.
	d) are transit-supportive, as appropriate; and	d) The site is served by multiple Grand River Transit routes, including the 13, 29, and 202 iXpress, providing convenient access to major destinations in Waterloo and Kitchener. By introducing higher-density residential units near these transit services, the development supports transit ridership and aligns with transit-oriented growth objectives.
	e) are freight-supportive.	e) Not applicable.
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 proposal represents an example of context sensitive intensification and redevelopment by introducing higher-density residential uses on an underutilized parcel within an established community, which is compatible with the height and density of projects near the intersection of Erb St. and Ira Needles Blvd. By

		providing a mix of one- and two-bedroom units, including a minimum of 30% affordable units, the development enhances housing diversity, leverages existing infrastructure, and contributes to the creation of a complete community with access to nearby parks, commercial services, and public transit, while remaining compatible with adjacent low- and mid-rise buildings.
Sewage, Water and Stormwater		
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 municipal water services include both centralized servicing systems and decentralized servicing systems.	The proposed development will be fully serviced by municipal water and sanitary systems, consistent with Provincial and municipal policy direction that settlement areas be supported by centralized servicing. By connecting to the existing municipal infrastructure, the development ensures efficient use of services, minimizes potential environmental impacts, and supports public health and safety in accordance with applicable regulations and standards.
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;	The subject property is proposed to connect to existing storm infrastructure as detailed in the Functional Servicing & Stormwater Management Report prepared by WalterFedy. Detailed stormwater design will be confirmed through the future Site Plan Approvals process.

	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.	

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, who are now responsible for its administration. 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.

i. Urban Area and Urban Designated Greenfield Area

The ROP identifies the subject property as within the City of Waterloo Urban Area and Urban Designated Greenfield Area, as per Map 2 of the ROP (Figure 11). This designation identifies lands within the Urban Area that are located outside the built boundary as identified by the Province.

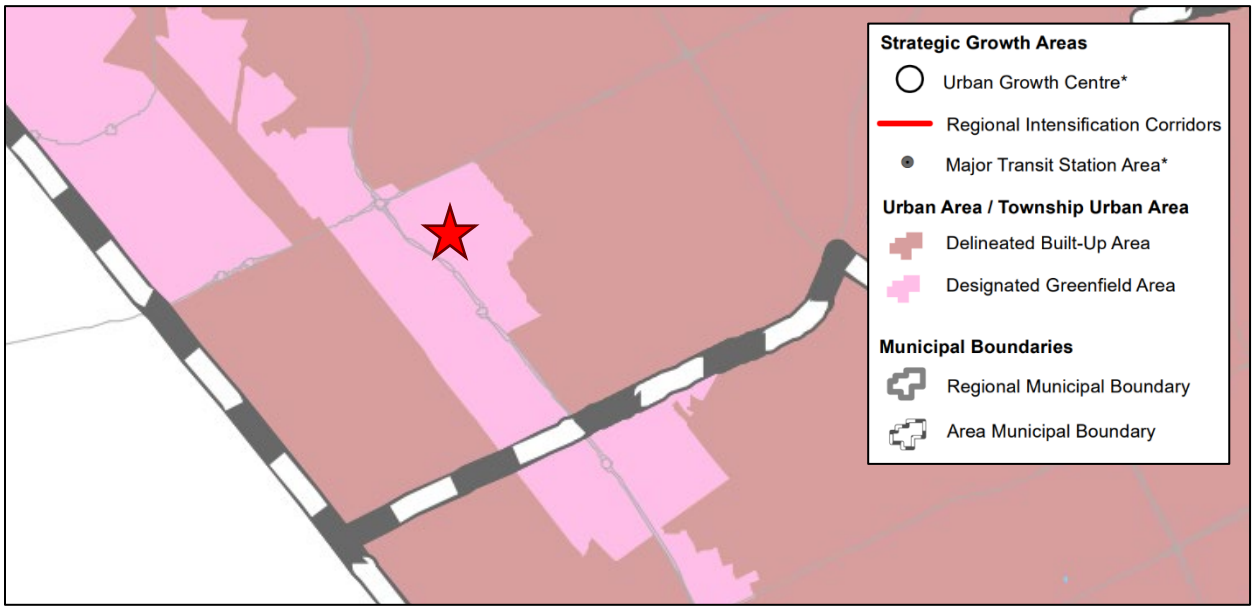

Figure 11: *Region of Waterloo Official Plan – Map 2 (Urban System) with the Subject Property indicated with Red Star*

Section 2.C.2.2. of the ROP 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 proposed development contributes to implementing the Regional urban system by directing medium-density residential growth to a designated Minor Node within the built-up area.
(b)(i)	Promote a more compact built form that enables walking, cycling, and rolling.	The compact six-storey form encourages walking, cycling, and rolling through close proximity to sidewalks, transit, and local amenities.
(b)(ii)	Contribute to 15-minute neighbourhoods.	The development supports 15-minute neighbourhood objectives by providing residents with convenient access to nearby shops, parks, transit, and community services.
(b)(vii)	Meet municipal High Performance Development Standards.	To be determined at the Site Plan Approval stage.
(c)	Ensure municipal water and wastewater servicing.	The development will be fully serviced by municipal water and wastewater infrastructure, consistent with Regional and municipal servicing policies.

(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.	By providing a mix of one- and two-bedroom units, including a minimum of 30% affordable units, the development contributes to housing diversity for households of varying sizes and incomes.
(g)	Avoid land use patterns that pose risks to health/safety/environment.	The proposed development avoids land use conflicts and environmental risks by connecting to municipal services and integrating with the surrounding residential and commercial context.
(h)	Improve accessibility for all ages and abilities.	The site design incorporates universal and barrier-free access, ensuring usability for residents of all ages and abilities.
(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 building and site design will promote a high-quality urban form through active frontages and landscaped spaces that enhance the streetscape.
(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.	Residents will have safe and convenient access to multiple transportation options, including pedestrian, cycling, and transit connections.
(j)(ii)	Public service facilities, co-located and integrated in community hubs	The proposed development is located near existing community facilities, supporting access to integrated public service hubs.
(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	On-site amenity areas and proximity to nearby parks and trails enhance access to urban greenlands, open space, and recreational opportunities.
(k)(i)	Expand access to transportation options.	The proposed development expands access to transportation options by providing direct connections to nearby bus routes, sidewalks, and cycling infrastructure.

Based on the above, it is our opinion that the proposed development conforms with Section 2.C.2.2 of the ROP.

Section 2.G of the ROP provides policy direction with respect to lands within the 'Designated Greenfield Areas'. Per Section 2.G, the ROP directs some future growth to designated greenfield areas to complement intensification within built-up areas. These new communities are to be compact, efficient, and designed as 15-minute neighbourhoods, where residents can conveniently access housing, jobs, schools, shops, parks, and community amenities without relying heavily on automobiles (2.G.1.2 a, 2.G.1.4, 2.G.1.5). Development is expected to prioritize walking, cycling, and transit, supporting a shift toward low-carbon, sustainable living. The objectives of the 'Designated Greenfield Areas designation are as follows:

- Build more compact greenfield communities to reduce the rate at which land is consumed;
- Plan and design designated greenfield areas to function as 15-minute neighbourhoods that feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities; and
- Provide for a balance of jobs and housing in greenfield communities across the region to need for long distance commuting.

The proposed development conforms to the objectives of Section 2.G of the ROP, as it supports the creation of a compact and efficient residential form within the Designated Greenfield Area. The proposal introduces a six-storey residential building that efficiently utilizes a limited land area through medium-density intensification, reducing the rate of land consumption and promoting a more sustainable pattern of growth. The site is well-positioned within the Westvale neighbourhood, in close proximity to a range of commercial, retail, recreational, and institutional uses, including The Boardwalk, Westside Marketplace Plaza, and several nearby parks and trails, supporting the concept of a 15-minute neighbourhood.

Section 2.G.1.2 of the ROP provides specific direction with respect to how new development taking place in designated greenfield areas will be planned, designated, zoned and designed based on the following criteria:

Policy Number	Policy / Objective	Discussion of Conformity
(a)	function as 15-minute neighbourhoods with a broad mix of land uses where people can meet their daily needs for goods, services and employment within a 15-minute trip by walking, cycling and rolling, and where other needs can be met by using direct, frequent and convenient transit;	The proposal supports the creation of a 15-minute neighbourhood by adding 56 residential units within walking distance of daily goods and services at West Quarter Plaza, Westside Marketplace, Waterloo Commons and the Erb/Ira Needles commercial node, while also providing direct access to frequent GRT routes (13, 29 and 202 iXpress) for longer trips.
(b)	promote a more compact built form by meeting or exceeding the minimum density targets set out in Table 4;	The six-storey, mid-rise form provides a compact built form that contributes to achieving and supporting the Region's

		density objectives for designated growth areas, reinforcing intensification within the existing urban fabric.
(c)	prioritize walking, cycling, and rolling, and taking transit over automobile trips by establishing a network of continuous sidewalks, trails and bicycle lanes that provide direct, safe, comfortable and well-maintained access to a variety of destinations for people of all ages and abilities and at all times of the year;	The design promotes walking, cycling and rolling by providing direct pedestrian connections to nearby sidewalks, parks and transit stops, and by accommodating long-term and short-term bicycle parking as part of the future site plan.
(d)	establish a street network with frequent connections and pathways to surrounding areas, a high degree of internal connectivity, and adopt a complete streets approach that ensures the needs and safety of all road users are considered and appropriately accommodated;	The site benefits from a well-connected street network with direct links to Westhill Drive, Ira Needles Boulevard and nearby collectors, supporting a complete-streets approach and multiple route choices for pedestrians, cyclists and vehicles.
(e)	implement land use patterns, building orientations to maximize solar gain, and urban design standards that support net-zero operational carbon buildings, including those related to energy efficiency and demand reductions, and enable community energy planning, renewable energy system and alternative energy systems, including district energy systems, in appropriate locations;	Details pertaining to building efficiency and energy systems will be determined at the Site Plan Application stage given the current conceptual nature of the proposal.
(f)	incorporate appropriate green infrastructure, low impact development, and urban heat island mitigation measures to adapt to the impacts of a changing climate;	These details will be determined at the Site Plan Application stage given the current conceptual nature of the proposal.
(g)	provide access to high-quality parks, greenspaces, and public service facilities to all members of the community in an inclusive and equitable way in accordance with the policies in Chapter 3;	Residents will have convenient access to high-quality parks, trails and public service facilities, including West Wind Park, McCrae Park and Westvale Park, supporting equitable access to recreation and open space.

(h)	within the Township Urban Areas, provide a development pattern and road network that supports the integration of transit services, where planned to be available in the future; and	Not applicable.
(i)	are serviced by a municipal water and wastewater system.	The proposed development will be fully connected to municipal water and wastewater systems, consistent with the Region's servicing policies for growth within settlement areas.

The proposed development further aligns with Regional objectives, notably in Section 2.D.6, by encouraging active transportation and transit use, given its accessible location near multiple GRT routes (13, 29, and 202 iXpress) and its provision of a reduced parking ratio supported by available transit options. Collectively, the proposal contributes to a balanced, connected, and sustainable greenfield community, consistent with the Region's intent to promote low-carbon, walkable living environments that integrate seamlessly with surrounding land uses.

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 aligns with Section 3.A of the Regional Official Plan by contributing to the Region's objective of providing a diverse range and mix of housing options to serve households of varying sizes, incomes, and ages. The project introduces 56 dwelling units with a mix of one- and two-bedroom units, supporting medium-density residential growth within the neighbourhood. In accordance with Regional policy, the development is designed to support affordable housing objectives, as it is being advanced as part of the Region's "Building Better Futures Initiative," which will require a minimum of 30% of units to be affordable for a term of not less than 30 years. The proposed mix of unit types and sizes, along with accessibility considerations, ensures the development contributes to meeting the broader housing diversity and affordability targets set out in Policies 3.A.2 and 3.A.17.

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 Urban Designated Greenfield Areas.

ii. Source Water Protection

The entirety of the subject property is located within a Wellhead Protection Area (WPSA-8), per Map 6a (Urban Area Source Water Protection Areas) of the ROP (Figure 12). Wellhead Protection Areas are the total area of land which contributes water to a municipal drinking-water supply well. The purpose of these designations is to prevent land uses involving hazardous chemicals and/or substances, disease causing organisms and land uses that increase the vulnerability of groundwater from becoming water quantity and/or quality risks to municipal drinking-water supply wells.

Wellhead Protection Sensitivity Areas (WPSA) are classified from 1 to 8, which allows for varying degrees of management relative to the vulnerability of the underlying groundwater to contamination, the importance of the well to the capacity of the municipal drinking-water supply systems, as well as the length of time groundwater within the WPSA will take to reach the municipal drinking-water supply well.

WPSA 8 delineates the area outside of the ten-year time of travel to the limit of the total land area contributing water to a municipal drinking-water supply well. The ROP states that Category 'A' uses (Very High Risk Uses) will not be permitted withing WPSA-8, while geothermal wells, mineral aggregate operations and wayside pits and quarries may be permitted subject to further study in accordance with Policy 8.A.4.

Based on our review of the applicable policies, it is our opinion that the proposed residential development would not have adverse impacts to groundwater in the Region, as it is not a Category 'A' use. Therefore, it is our opinion that the proposed development conforms to the Source Water Protection policies in the ROP.

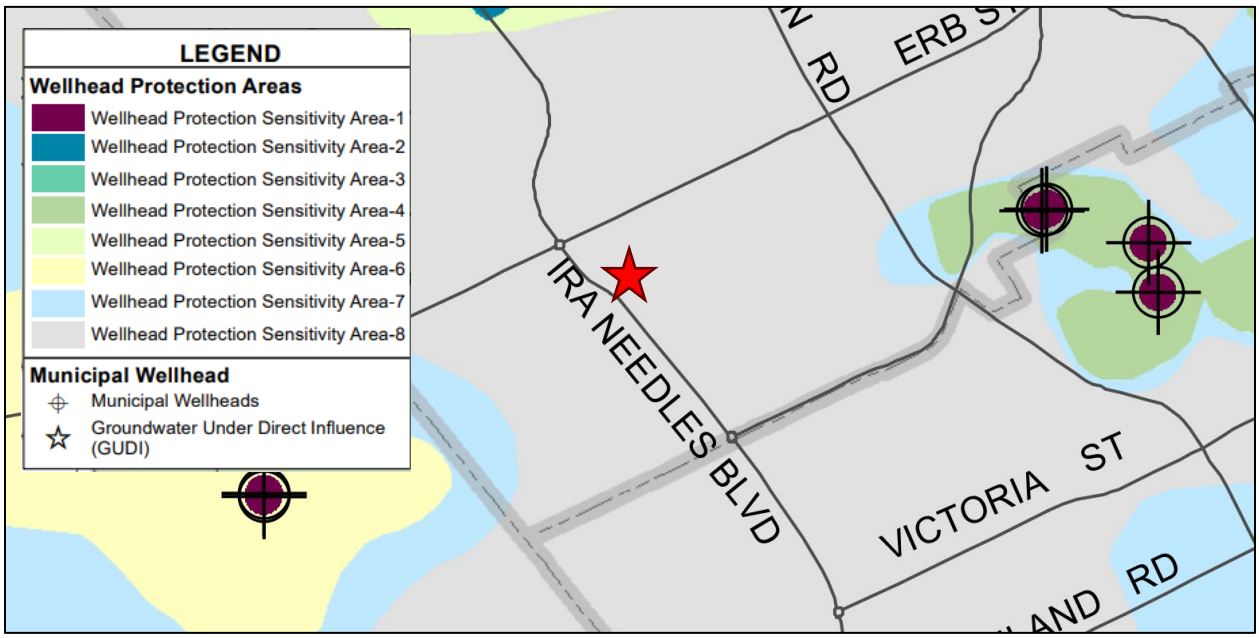

Figure 12: *Region of Waterloo Official Plan – Map 6a (Urban Area Source Water Protection Areas) with the Subject Property indicated with Red Star*

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 - Mixed-Use Medium Density Residential

The subject property is currently designated as 'Mixed-Use Medium Density Residential', as per Schedule A (Land Use Plan) of the Official Plan (Figure 13).

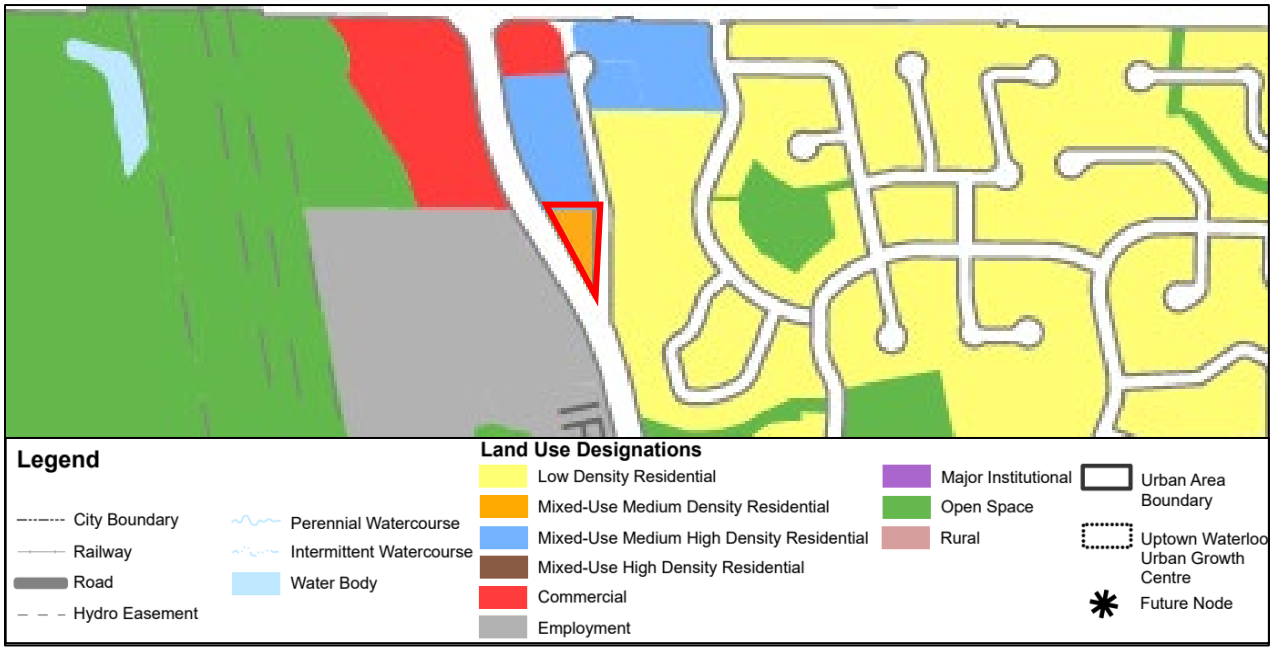

Figure 13: *City of Waterloo Official Plan – Schedule A (Land Use Plan)*

As per Section 10.1.4 of the Official Plan, that the Official Plan provides that the 'Mixed-Use Medium Density Residential' designation is a category in which medium density housing types are the predominant use of land. Properties are to be developed primarily for residential purposes,

although complementary and ancillary uses are also permitted. The aim of this designation is to encourage medium density, mixed-use, primarily residential development within Minor Corridors, recognizing that properties may also function as a transition from low density areas to medium high and high density areas. More specifically, Section 10.1.4(1) of the Official Plan states that lands within this designation may be zoned to permit multiple unit residential buildings that are greater in intensity than duplexes.

Based on the above policy, the proposed multi-unit residential development is considered a permitted use in the 'Mixed-Use Medium Density Residential' designation.

Section 10.1.4(4) of the Official Plan notes that to ensure properties are of sufficient size to accommodate additional height and density, lands designated 'Mixed-Use Medium Density Residential' shall have adequate frontage and/or flankage. The implementing Zoning By-Law may contain minimum frontage and/or flankage requirements.

The subject property has an approximate total area of 2,835 square metres, with dual frontage of 70 metres onto Westhill Drive and 95 metres onto Ira Needles Blvd. The frontages meet and exceed these minimum requirements in the Zoning By-law, therefore, it is our opinion that the proposed development is located on a property with sufficient size.

Therefore, it is our opinion that the proposed development conforms to the applicable policies of the 'Mixed-Use Medium Density Residential' designation and an Official Plan Amendment is not required.

ii. Height and Density - Medium Density, 20 metres

The subject property is within the 'Medium Density, 20 metres' designation, as per Schedule 'B1' in the Official Plan (Figure 14).

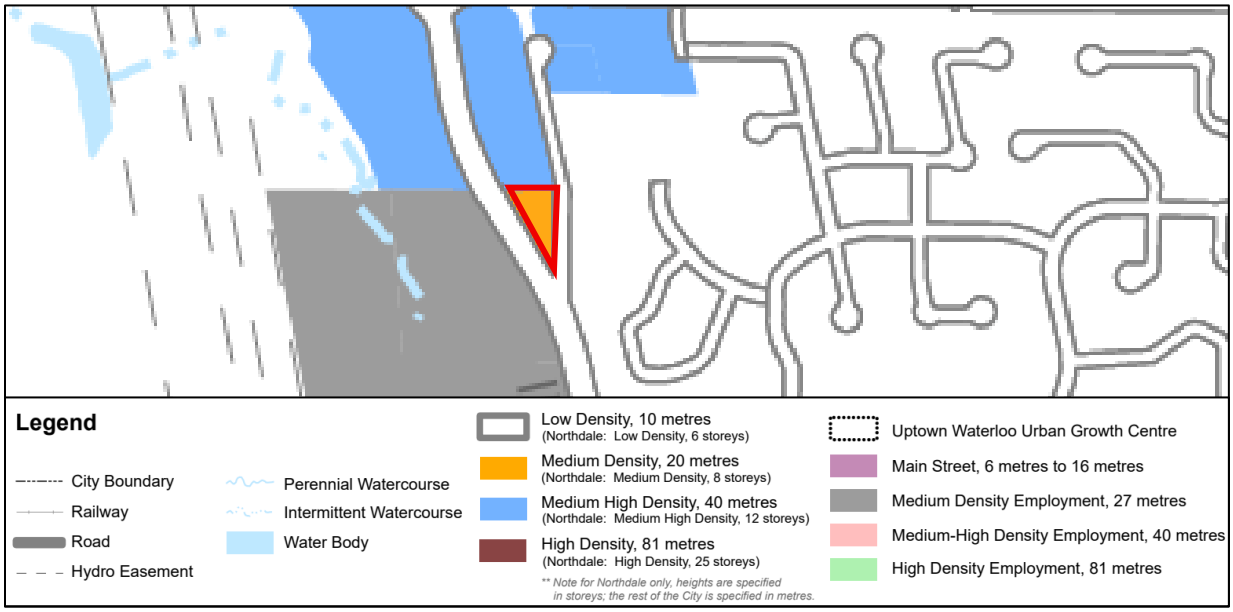

Figure 14: *City of Waterloo Official Plan – Schedule B1 (Height and Density)*

As per Section 3.4(1)(c) of the Official Plan, the maximum permitted height on the subject property is 20 metres within this designation. Further Section 3.4(2)(c) of the Official Plan provides a maximum density of 450 bedrooms per hectare within this designation. These policies are further reinforced in Section 10.1.4(3) of the Official Plan for the overarching 'Mixed-Use Medium Density Residential' designation.

The proposed development contemplates a height of 6 storeys at 20 metres, as well as maximum density of 230 bedrooms per hectare. Therefore, the proposed development conforms to the height and density policies of the Official Plan, and an Official Plan Amendment is not required.

iii. Nodes and Corridors – Minor Node

The subject property is within the 'Minor Node' designation, as per Schedule 'B' (City Structure) of the Official Plan (Figure 15).

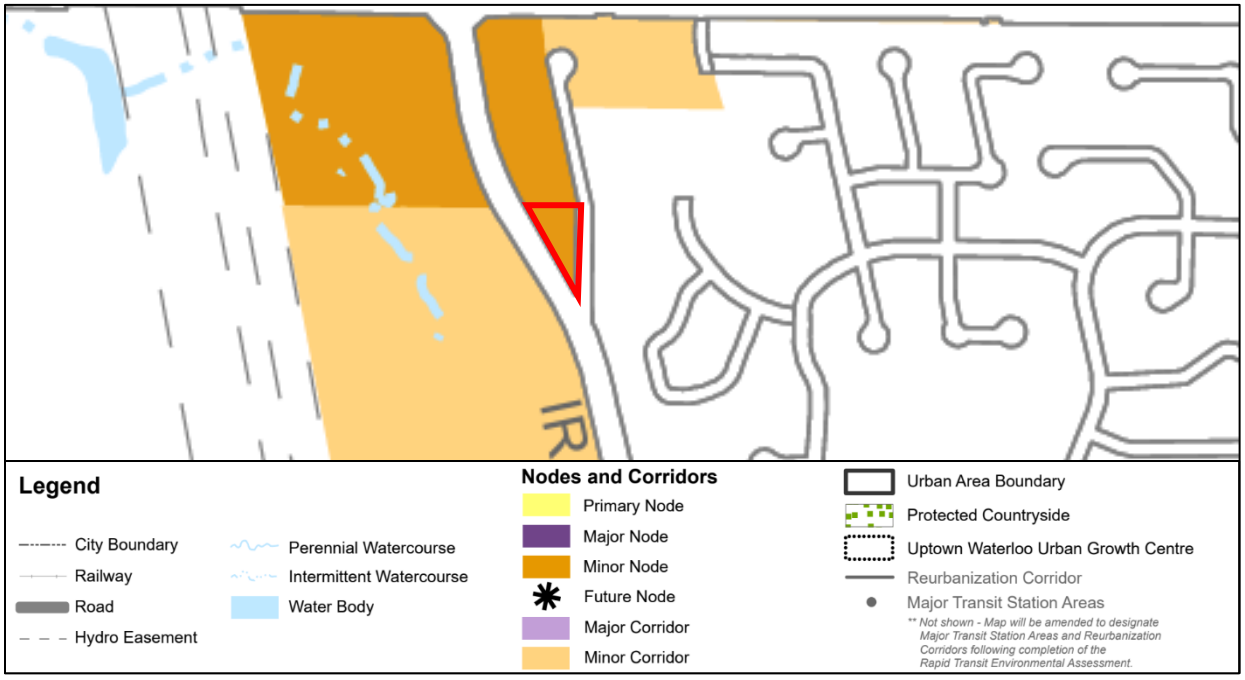

Figure 15: *City of Waterloo Official Plan – Schedule B (City Structure)*

Section 3.6.1(3) of the Official Plan directs that Minor Nodes should be planned as medium to medium-high density mixed-use areas that accommodate a range of uses, which may include residential, commercial, employment, social, cultural, recreational and institutional uses. Minor Nodes generally include neighbourhood-serving commercial centres that provide for the day to day and weekly shopping needs of the surrounding neighbourhood and, where appropriate, shall be planned to accommodate small to medium-sized food stores, with the objective that all residents will have access to a food store within two kilometers of their residence.

The proposal to introduce a 6-storey residential building containing 56 dwelling units is, in our opinion, in conformity with this direction and aligned with the medium-density residential built form envisioned for the Westvale Minor Node, per Section 3.6.1(3) noted above. This scale of the proposed development supports the creation of a more vibrant, complete, and connected

community, while remaining compatible with the surrounding mid-rise and low-rise built form, including nearby retirement and apartment buildings.

The subject property is within convenient walking distance of a variety of neighbourhood-serving commercial amenities, including West Quarter Plaza, Westside Marketplace Plaza, and Waterloo Commons Plaza, which provide residents with access to shopping, including grocery and convenience services within close proximity of the site. By adding new residential units in close proximity to these commercial areas, the proposed development supports the sustainability and viability of the Minor Node's commercial uses, enhancing their ability to serve both existing and future residents.

Section 3.6.5 of the Official Plan provides additional policy direction with respect to intensification in nodes and corridors, which includes the following criteria:

Policy / Criteria	Discussion of Conformity
(1) Mixed-use development will be encouraged within the designated Nodes and Corridors, where appropriate, provided the land use designation and zoning support such mixed-use development. It is not the intent of this Plan that all lands within Nodes and Corridors will accommodate a full mix of uses and direction will be provided in this regard through the land use designations applied to the lands.	While the subject property is designated for residential use, the proposal contributes to the broader mixed-use objectives of the Minor Node by introducing medium-density residential development in proximity to existing neighbourhood-serving commercial uses, including West Quarter Plaza, Westside Marketplace Plaza, and Waterloo Commons Plaza. Although the site is not intended to accommodate a full mix of uses, the residential intensification supports the overall viability of the Node by adding population to sustain nearby commercial and community services.
(2) High Density, Medium-High Density and Medium Density land uses will be encouraged to locate in designated Nodes and Corridors and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses.	The proposed six-storey building represents medium-density residential development, aligning with the Official Plan's encouragement of higher-density uses within Nodes and Corridors. Its location adjacent to major arterial roads (Ira Needles Blvd and Erb Street West), nearby community infrastructure, and multiple transit routes ensures efficient access to services, supports transit use, and contributes to the concentration of residential growth where infrastructure and amenities can accommodate increased density. The scale of the proposal also provides for a transition in density from the more intensive developments existing or under construction at the intersection of Erb St. and Ira Needles Blvd.

(3) Construction of new low density uses will be discouraged within designated Nodes and Corridors. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter, with particular emphasis on section 3.8 for any development application, excluding applications for site plan approval, within Major Transit Station Areas.	The development introduces a medium-density built form on a site that is currently underutilized, in keeping with the Official Plan's direction to avoid new low-density development within Nodes and Corridors. By proposing a six-storey multiple residential building rather than additional low-rise housing, the project is consistent with intensification objectives and the efficient use of land and infrastructure in this part of the City.
(4) Intensification of existing low density housing to higher density multiple residential buildings will be encouraged in designated Nodes and Corridors by the application of minimum densities on residential lands.	While the site is currently vacant, the proposed development achieves the minimum density objectives by introducing 56 dwelling units, including a mix of one- and two-bedroom units, which contributes to a compact, efficient form of residential growth compatible with surrounding uses while reinforcing the role of the Node as a focus for higher-density development.
(5) Lot consolidation shall be encouraged to provide properties of sufficient size that enable medium, medium-high and high density development. The Zoning By-Law may identify minimum lot sizes in designated Nodes and Corridors to ensure that an appropriate scale of development is achieved.	Not applicable.
(6) In addition to general urban design policies that apply city-wide, area- specific urban design policies for designated Nodes and Corridors shall also apply, as found in policy 3.11.2 of this chapter.	See Section 8 of this Report for the urban design review.
(7) The City, in consultation with the Municipal Heritage Committee, encourages adaptive reuse of historically significant built resources, and requires the conservation of cultural heritage resources in all areas of the City, including designated Nodes and Corridors.	Not applicable.

Section 3.6.6 of the Official Plan provides policy direction with respect to parking in nodes and corridors, which includes the following criteria:

Policy / Criteria	Discussion of Conformity
(1) The property is located on the periphery of a low rise residential neighbourhood; or	The subject property is located at the edge of an established low-rise residential neighbourhood, adjacent to existing mid-rise and low-rise residential buildings along Westhill Drive. The proposed six-storey development represents a sensitive form of intensification, maintaining compatibility with the surrounding neighbourhood by transitioning in scale from the higher-density uses along the Minor Node corridor to the lower-density residential areas to the east.
(2) Underground and structured parking is encouraged within Designated Nodes and Corridors	In accordance with the City's Official Plan and urban design manuals which encourage of the use structured parking in Designated Nodes and Corridors, the proposed development provides 24 structured parking spaces accessed from Ira Needles Boulevard, taking advantage of the natural grade of the site, while minimizing surface parking visibility from Westhill Drive. This approach ensures an efficient use of land, reduces the visual impact of parking, and supports a pedestrian-friendly streetscape.
(3) Parking requirements will be defined in the Zoning By-Law and may include provisions for: (a) Minimum and maximum amount of parking to be provided, including maximum limits on surface parking.	A total of 48 parking spaces are proposed, with 42 spaces allocated to dwelling units (0.75 spaces/unit) and 6 spaces for visitor parking (0.1 space/unit). The proposed allocation is being requested as part of the proposed Zoning By-law Amendment for a reduced rate and limits the amount of surface parking to 24 spaces, thereby supporting a compact and efficient site design.
(b) Reduced parking standards that may be permitted where sharing of parking facilities or areas is feasible, transit service is readily available and/or there is a demonstrated community benefit that supports a parking reduction.	The proposed reduced parking ratio reflects the site's proximity to multiple transit routes (13, 29, and 202 iXpress) and nearby amenities, which supports the use of alternative transportation. Additionally, the design contributes to community benefits by allowing for increased open and amenity space on-site, supporting a more sustainable and pedestrian-oriented development.
(c) Requirements for long-term and short-term bicycle parking.	Although detailed bicycle parking provision will be confirmed at the future site plan stage, the development anticipates 0.6 bicycle spaces per unit, split between Type A (long-term) and Type B (short-term) parking. Ample space is provided on-site for future implementation of the required 34 bicycle parking spaces, including secure

	indoor storage and convenient outdoor access to encourage cycling as a primary mode of transportation.

Based on the above, it is our opinion that the proposed development conforms with the 'Minor Node' designation policies in the City of Waterloo Official Plan.

iv. Source Water Protection Area

As previously noted for the ROP section in this Report, the City of Waterloo Official Plan establishes Source Water Protection Areas that reflect the ROP. Per Section 8.3.3.1 of the City's Official Plan, Source Water Protection Areas are identified as "areas that contribute water, or are in close proximity, to municipal drinking-water supply wells that are vulnerable to contamination and/or depletion from incompatible land uses". The entirety of the subject lands is located within a Wellhead Protection Sensitivity Area (WPSA) 8 of the Official Plan. The proposed residential development is not anticipated to have adverse impacts to the groundwater, as previously noted in this Report.

v. Urban Design

The Official Plan sets out policy direction with regard to urban design. The proposed development is subject to the general urban design policies (Section 3.11.1), as well as the specific policies for Nodes and Corridors (Section 3.11.2). These policies and assessment of how the proposed development addresses the City's urban design framework can be found in Section 8 of this Report.

e) City of Waterloo Official Plan Amendment No.58

The City of Waterloo is advancing 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 – Medium Rise Residential

The subject property is proposed to be designated 'Medium Rise Residential' in in Schedule 'A' of OPA 58 (Figure 16). Though many of the policies from the current 'Medium *Density* Residential' designation remain the same, the following provides an overview and analysis of the adopted policies. Section 10.1.4 remains much the same as the current in-force and effect policies. Notably, the proposed multi-unit residential development is still permitted in the 'Medium Rise Residential' designation.

Therefore, it is our opinion the proposed development would continue to conform to the land use designation policies.

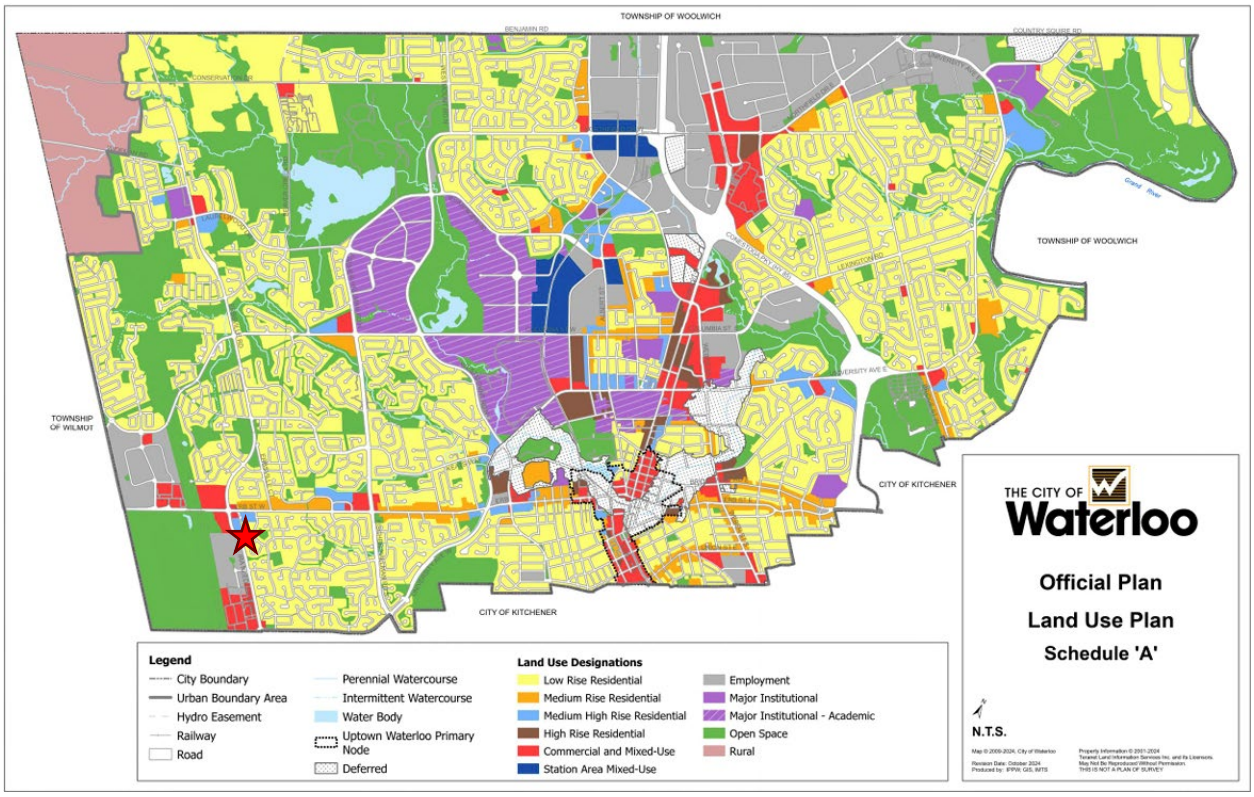

Figure 16: *Official Plan Amendment No.58 - Adopted Schedule 'A' (Land Use Plan) with the Subject Property indicated with Red Star*

ii. Built Form – Medium Rise, 6 Storeys

The subject property is proposed to be designated 'Medium Rise, 6 Storeys', as per Schedule 'B1' of OPA 58 (Figure 17). Per Section 3.4(1)(c), OPA 58 proposes to remove the 20 metre maximum height requirement and replace this policy with a maximum height of 6 storeys. The density requirement of 450 bedrooms per hectare was also removed in Section 3.4(3)(c) as part of OPA 58 and may be established in the implementing Zoning By-law. As such, it is our opinion the proposed development would continue to conform to the proposed maximum height policy, as the maximum height is 6 storeys.

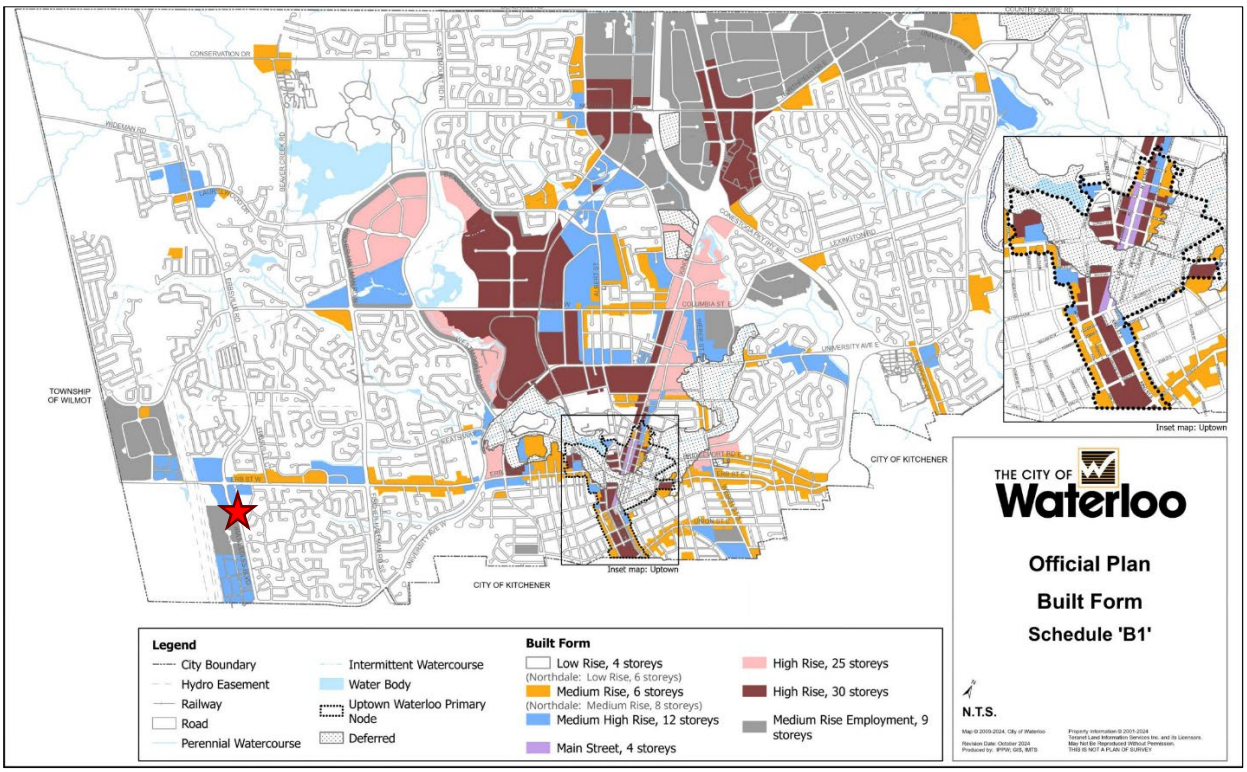

Figure 17: *Official Plan Amendment No.58 - Adopted Schedule 'B1' (Built Form) with the Subject Property indicated with Red Star*

iii. Nodes and Corridors – Minor Node

The subject property is proposed to be designated 'Minor Node' as per Schedule 'B' of OPA 58 (Figure 18). As such, the current designation per the in-force and effect Official Plan would remain the same. Section 3.5.1 in OPA 58 made minor changes to the vision policy of the 'Minor Node' designation, which states Minor Nodes are planned as medium to medium-high rise mixed-use areas that accommodate a range of uses, which may include residential, commercial, employment, social, cultural, recreational and institutional uses. Minor Nodes generally include neighbourhood-serving commercial centres that provide for the day to day and weekly shopping needs of the surrounding neighbourhood and, where appropriate, shall be planned to accommodate small to medium-sized food stores, with the objective that all residents will have access to a food store within an approximate 15-minute walking distance of their residence. Where lands within a Minor Node are adjacent to Low Density Rise Residential areas, height and/or density will be limited as defined by this Plan and the Zoning By-law.

Section 3.6.5 of the City Official Plan pertaining to intensification within Nodes and Corridors (noted earlier in this Report) remains the same, while Section 3.6.6 pertaining to parking within Nodes and Corridors is proposed to be removed. Therefore, it is our opinion the proposed development would continue to conform to the proposed 'Minor Node' designation policies.

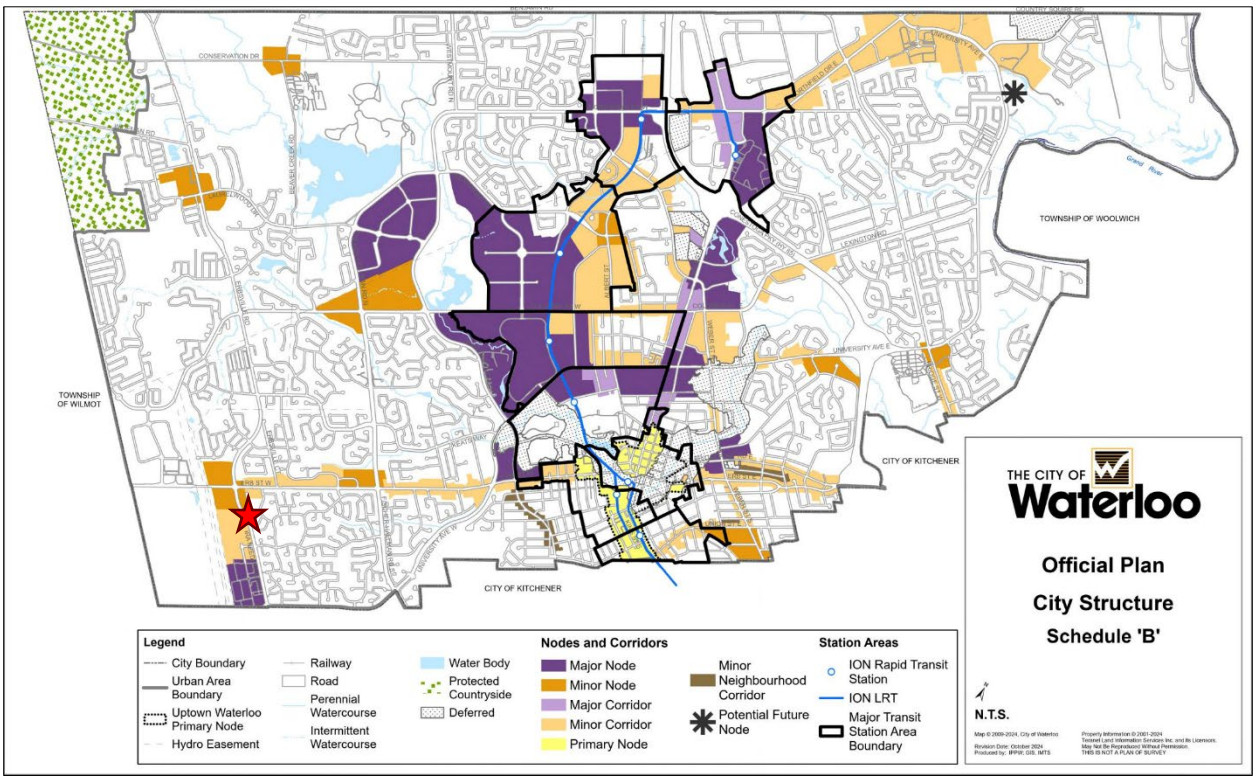

Figure 18: *Official Plan Amendment No.58 - Adopted Schedule 'B' (City Structure) with the Subject Property indicated with Red Star*

f) City of Waterloo Zoning By-Law 2018-050

The subject property is currently zoned 'Residential Nine' (R9) in the Zoning By-law, as shown in Figure 19 below.

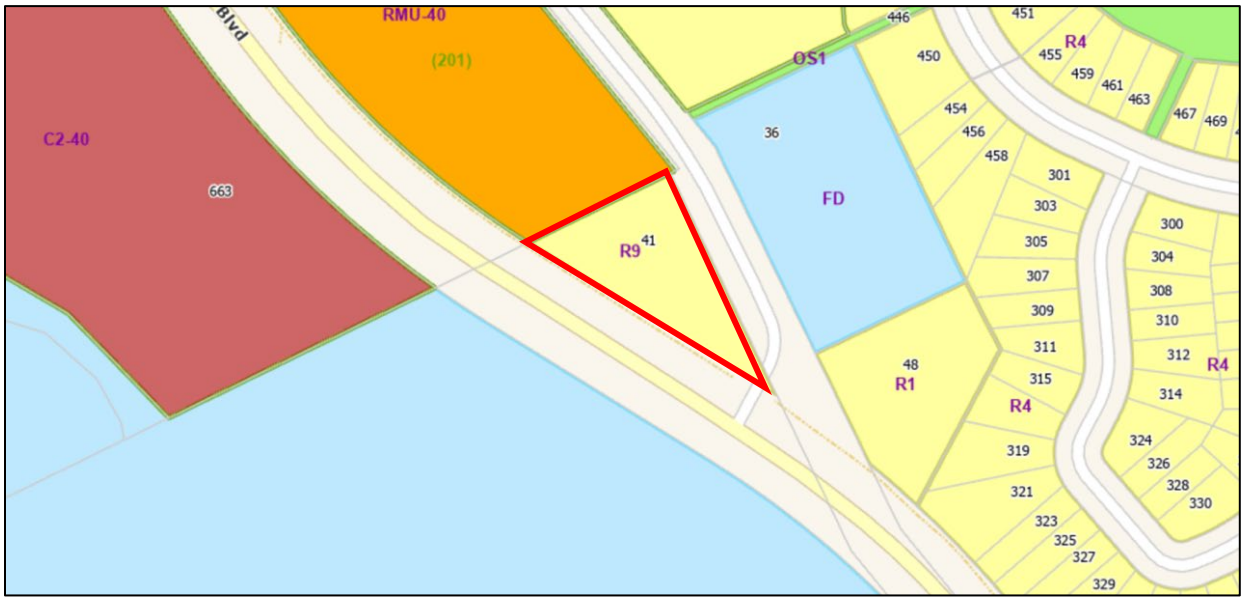

Figure 19: *City of Waterloo Interactive Zoning By-law Map*

As per Section 7.9.1 of the Zoning By-law, the 'R9' Zone permits a broad range of residential uses, including Apartment Buildings; Townhouse Building; Freehold Townhouse Building; Stacked Townhouse Building; Triplex Building; Long-Term Care Facility and; Assisted Living Facility.

Although the proposed apartment building is considered as permitted use within the R9 Zone, the applicant is requesting to rezone the subject property from R9 Zone to 'Residential Mixed-Use 20' (RMU-20-XX) with Site Specific Provisions to permit the proposed density and allow for non-residential uses on Level 1 in the event the ground floor amenity spaces are utilized for such purposes in the future approvals process. Mixed-use developments with the proposed height and density are permitted in the overarching Mixed-Medium Density Residential designation and strongly encouraged in Minor Nodes. Please refer to Section 7 of this Report for the land use planning rationale regarding the Zoning By-law Amendment justification.

Table 7O of the Zoning By-law provides direction with respect to the performance standards in the RMU-20 Zone. The following table reviews the details of the proposed development to the RMU-20 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:

Regulations	**Required**	**Proposed**
LOT FRONTAGE (minimum)	20 metres	69.1 (Westhill Dr)
STREET LINE setback (minimum)	5 metres	5 metres
STREET LINE setback (maximum)	At least 75% of the STREET LINE FRONT BUILDING FAÇADE shall be within 7.5 metres of the STREET LINE	5 m metres
SIDE YARD setback (minimum)	3 metres	5 metres
REAR YARD setback (minimum)	7.5 metres	**5 metres**
BUILDING HEIGHT (minimum)	7.5 metres	20 metres
BUILDING HEIGHT (maximum)	20 metres and 6-storeys	20 metres
DENSITY (minimum)	450 BEDROOMS per hectare	230 bedrooms per hectare (65 bedrooms / 0.28343 ha.)
LANDSCAPED OPEN SPACE	30%	33%
Number of main BUILDINGS per LOT (maximum)	More than one (1) permitted	1
Height of FIRST STOREY (minimum)	4 metres	4 metres

AMENITY AREA (minimum)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT 186 m²	350 m^2
7.10.5	Notwithstanding anything to the contrary, every BUILDING shall have a front entrance at GRADE on the FRONT BUILDING FAÇADE and or FLANKAGE BUILDING FAÇADE.	Provided on both Westhill Drive (upper lobby) and Ira Needles Blvd (lower lobby).
7.10.7 – Parking Rate (minimum) **(Updated per Housekeeping Zoning By-law Amendment Z-25-09)**	All Other Areas (Area E): Use: 0.90 spaces / dwelling unit Visitor: 0.1 spaces / dwelling unit 56 spaces	**Use: 42 spaces (0.75 spaces/unit)** Visitor: 6 spaces (0.1 spaces/unit) 48 spaces
7.10.10 d)	For a CORNER LOT, the BUILDING FLOOR AREA devoted to the uses specified in section 7.10.10.a.) shall abut the entire FRONT BUILDING FAÇADE and or the entire FLANKAGE BUILDING FAÇADE, provided further that 7.10.10 d) i) and 7.10.10 d) ii) are satisfied.	Specified uses abut the front building façade.
3.A.4.2 Amenity Area (minimum)	APARTMENT BUILDINGS, MULTI-UNIT RESIDENTIAL BUILDINGS and MIXED USE BUILDINGS containing fifty (50) BEDROOMS or more shall provide a minimum of 30% of the required AMENITY AREA as common AMENITY AREA, meaning AMENITY AREA designed, intended and accessible to all residents of the BUILDING. 105 m^2	184 m^2
6.1.6.2	In residential zones, or for a BUILDING used in whole or in part for residential purposes, all PARKING SPACES shall be located	Provided behind front building line.

	behind the FRONT YARD BUILDING LINE and the FLANKAGE YARD BUILDING LINE.	
6.2.1	Notwithstanding anything to the contrary, UNDERGROUND PARKING shall comply with the FRONT YARD BUILDING LINE setback and FLANKAGE YARD BUILDING LINE setback in the zoning category applied to the LOT.	Provided behind front building line.
6.3.1.2 – Electric Vehicle (EV) Parking	Minimum 1 EV parking is required for the range of 20- 49 parking spaces constructed.	1 space
6.3.1.3	Where Electric Vehicle Parking is required in Table 6C for a residential USE, a minimum of 50% of the required spaces shall be VISITOR PARKING SPACES.	1 space
6.4.1 – ACCESSIBLE PARKING **(Updated per Housekeeping Zoning By-law Amendment Z-25-09)**	For number of parking spaces provided: 26-50 spaces 1 Type A space 1 Type B space	1 Type A 1 Type B
6.6.2 b.)	Where a LOT contains twenty (20) or more DWELLING UNITS: i) a minimum 0.3 TYPE A BICYCLE PARKING spaces shall be provided for each DWELLING UNIT; ii) a minimum zero-point-three (0.3) TYPE B BICYCLE PARKING spaces shall be provided for each DWELLING UNIT.	Bike parking ratio will be determined at the SPA stage. Anticipated to be in compliance with Zoning By-law provision 6.6.2.b.). No relief is requested and required bicycle parking will be provided.

6.8 – DRIVEWAY REGULATIONS	LOT containing ten (10) or more PARKING SPACES: Width (minimum): 6.1m Width (maximum): 7m where a DRIVEWAY is to/from a REGIONAL HIGHWAY, and 7.0 metres in all other instances.	6.1 metres
6.9.4.4 – Loading Space **(Updated per Housekeeping Zoning By-law Amendment Z-25-09)**	All Other Areas: 26-300 units 1 Type A	1 Type A

Based on the table above, the following Site-Specific Provisions would be required to the proposed RMU-20-XX Zone:

- Permit a minimum of rear yard setback of 5.0 metres, whereas the Zoning By-law requires a minimum of 7.5 metres; and,
- Permit a minimum of parking ratio of 0.75 spaces per dwelling units, whereas the Zoning By-law requires a minimum of 0.90 spaces per dwelling unit.

7. LAND USE PLANNING RATIONALE

This section of the Report builds of the previous sections and provides land use planning opinion with regards to the site-specific planning provisions proposed to accommodate the contemplated development. These site-specific requests include modifications to the minimum rear yard setback and parking ratio per dwelling unit. 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) Alignment with Overarching Planning Framework

The proposed development has appropriate regard for the "Matters of Provincial Interest" outlined in Section 2 of the *Planning Act*, as it represents an efficient, transit-supportive form of residential intensification within an existing settlement area. The proposal contributes to the provision of a full range of housing options, promotes the orderly development of a safe and healthy community, and ensures the efficient use of land and existing infrastructure. The proposed development also is consistent with the PPS 2024, which directs growth to settlement areas and encourages the optimization of land and infrastructure. The proposed multi-unit development efficiently utilizes existing services and contributes to housing supply within the urban boundary.

At the regional and municipal levels, the proposal conforms to the policies of the ROP and the City of Waterloo Official Plan. The site is located within a Minor Node and within the Urban Area Boundary, where growth, intensification, and a mix of housing options are encouraged. The development supports the ROP's direction for compact, mixed-use, and transit-oriented communities, while the City's Official Plan promotes mid-rise built forms in Minor Nodes to support complete, connected, and sustainable neighbourhoods. The proposed building height, massing, and use align with these objectives, contributing positively to the urban structure envisioned by both policy frameworks.

b) Efficient Use of Infrastructure and Municipal Servicing

The proposed development will be fully connected to existing municipal water, sanitary, and stormwater infrastructure, with adequate capacity to accommodate the proposed density. The development utilizes existing infrastructure and avoids extensions of municipal services, consistent with the PPS, as well as Region and City Official Plan objectives for cost-effective growth management. By situating intensification within an existing serviced area, the proposal supports the Region's goals of reducing infrastructure lifecycle costs, optimizing land use efficiency, and minimizing long-term servicing demands.

The site's proximity to public transit routes and active transportation infrastructure further contributes to infrastructure efficiency by reducing automobile dependency and encouraging more sustainable mobility choices. More specifically, the proposed development aligns with Regional objectives by encouraging active transportation and transit use, given its accessible location near multiple GRT routes (13, 29, and 202 iXpress) and its provision of a reduced parking ratio supported by available transit options.

c) Appropriate Massing, Built Form, and Density in a Minor Node

The proposed development represents a compatible and contextually appropriate form of intensification within the Minor Node designation, where the City's Official Plan directs moderate increases in height and density to support complete, transit-supportive communities. The proposed development contributes to the emerging pattern of intensification along Westhill Drive, which has been identified as an appropriate corridor for mid-rise and high-rise residential growth. Directly north of the subject property, existing development includes a 5-storey retirement residence at 7 Westhill Drive, an 11-storey apartment building at 25 Westhill Drive, and a 4-storey apartment building at 28 Westhill Drive, all of which establish higher-density forms of housing within the Node. Further, a mixed-use development currently under construction at 635 Erb Street West and 12 Westhill Drive will add additional apartment and stacked townhouse units, contributing to a compact and complete community structure.

Immediately east of the subject lands, 36 Westhill Drive is subject to a concurrent Official Plan Amendment and Zoning By-law Amendment application submitted in August 2025, proposing two residential apartment buildings of 6 and 8 storeys in height, with a total of 140 units. This adjacent proposal, along with the existing mid- and high-rise buildings in the area, demonstrates that the surrounding built form is already transitioning toward a more urban and intensified residential character consistent with the function of a Minor Node.

It is our opinion the proposed building fits within this context, complementing the evolving streetscape and reinforcing the planned built form along Westhill Drive. The massing of the building maintains appropriate relationships with adjacent properties, with careful consideration given to transitions in height, setbacks, and articulation to respect the established context while achieving the City's intensification objectives. Overall, the proposed massing, built form, and density are appropriate for the site's location within a Minor Node and align with the broader planning vision for a complete, connected, and compact urban community.

d) Reduced Minimum Parking Ratio

The proposed development includes a reduced minimum parking ratio of 0.75 spaces per dwelling unit (42 spaces for the proposed 56 dwelling units), with an additional 6 visitor spaces (which would meet the Zoning By-law requirement). This reduction is appropriate given the site's location along Westhill Drive, within walking distance of multiple GRT routes, including Routes 13 (Laurelwood), 29 (Keats-University), and 202 iXpress (University), which provide convenient and frequent connections to the University of Waterloo, Laurier University, Boardwalk Station, Conestoga Station, and other key destinations in Waterloo and Kitchener. The site's transit access may reduce residents' reliance on personal vehicles and supports sustainable modes of transportation.

In support of the requested relief, it is also noted that City Council recently approved Housekeeping Zoning By-law Amendment Z-25-09, which among other updates, reduced the residential parking requirement from 1.1 spaces per unit to 1.0 spaces per unit for the RMU-20 Zone in Area E. As a result, the proposed development now provides a modest deficiency of 8

spaces, reflecting the City's broader policy direction to reduce minimum parking standards and support transit-oriented, land-efficient forms of housing. It is our opinion that this recent city-wide amendment reinforces the suitability and appropriateness of the reduced parking ratio being requested.

The proposed development is also within close walking distance to a range of commercial and retail amenities, including West Quarter Plaza, Westside Marketplace Plaza, Waterloo Commons Plaza, and the commercial node at Erb Street West and Ira Needles Blvd, all of which accommodate day-to-day shopping and service needs. These nearby destinations further reduce the need for private vehicle use, enabling residents to meet many of their daily needs without a car.

Additionally, the proposed development is a mixed-income residential project, consistent with the Region of Waterloo's past affordable housing initiatives, which have demonstrated historically lower parking demand relative to market-rate residential projects. This is particularly true for developments consisting of one and two-bedroom units, as smaller unit sizes generally generate fewer vehicle trips per unit. In combination, the unit mix, proximity to transit, and nearby commercial services support a reduced parking requirement without compromising functionality or livability. It is our opinion the reduced parking ratio is therefore appropriate, consistent with City and Regional policies encouraging transit-supportive development and the efficient use of land within urban growth areas.

e) Reduced Minimum Rear Yard Setback

The requested reduction in rear yard setback along Ira Needles Blvd is appropriate given the nature of the street and the depth of the subject property. The proposed 5.0-metre setback maintains adequate separation from the public right-of-way to accommodate landscaping, buffering, and a high-quality street interface, while ensuring efficient site utilization for the building footprint and surface parking areas.

Given the building's orientation and the road's wide cross-section, the reduction will not result in adverse shadow, privacy, or visual impacts. Instead, it facilitates a more pedestrian-friendly street relationship that aligns with the City's urban design policies for Nodes and Corridors, emphasizing an active and engaging public realm along major streets. While the ground floor uses will be determined during the Site Plan Application and/or future approval stage, the units facing Ira Needles Blvd at a setback of 5.0 metres will enhance activation of this frontage with active uses.

8. 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

Section 3.11 of the City of Waterloo's Official Plan sets out high-level urban design objectives and policies to ensure growth and development in the City achieves a high standard of urban design. The proposed development has been designed to reflect the many of these objectives:

- To address the integration, compatibility, built-form (including massing), and relationship of new development to existing buildings and the surrounding neighbourhood character and context.
- To reinforce and maintain the architectural, visual, and thematic integrity of structures, streetscapes, neighbourhoods and planned development.
- To promote a coordinated approach to streetscape design that results in an attractive and coordinated character.
- To respect context and promote a sense of place, emphasizing neighbourhood character and contributing towards a sense of place or strong identity.
- To promote safe, comfortable and accessible environments for all users with an emphasis on pedestrians and bicyclists through the universal principles of CPTED (Crime Prevention Through Environmental Design).
- Design sites and buildings based on an efficient, safe and integrated circulation system with priority given to pedestrian movements, nonvehicular movements and safe vehicular turning movements.
- Design sites and buildings located along transit routes, and planned transit station areas, to promote transit use, pedestrian and cyclist accessibility, active and interesting streetscapes, human comfort and integrated site amenities.
- To promote the adaptation of transportation networks, buildings and lands used by the public to provide barrier-free access and principles of universal design to all citizens and to encourage the use of the International Symbol of Access.
- To reduce the visual impact of parking and the urban heat island effect of asphalt through efforts to "green" or soften the urban landscape.
- To reinforce human scale dimensions and proportions through design.
- To design architecturally well-composed buildings that complements and enhances the surrounding neighbourhood's character and context.
- To design sites with a balanced distribution of hard and soft landscaping that contributes toward a coordinated and enhanced site design, streetscape character, create a sense of place, and an aesthetically pleasing comfortable pedestrian environment.
- To design sites and buildings to include a range of on-site amenities.

- To promote sustainable design practices in the public and private realm through a variety of strategies.

In our opinion, the proposed development adheres to these objectives as the development:

- Is of a similar scale and density as other projects in the vicinity of the development and will have a compatible height and density of these existing developments.
- The proposed development fosters interaction with the street, by orienting the development towards Ira Needles Blvd and limiting the visibility of parking areas and on-site amenities towards the rear and underneath of the site.
- The development contemplates a modern and attractive design with a high standard of urban design.
- The orientation of the development will enhance the streetscape of Ira Needles Blvd and Westhill Drive and is sympathetic to adjacent sites.
- The development represents context-appropriate intensification within the City's Urban Designated Greenfield Area, supporting the efficient use of existing urbanized lands and municipal infrastructure.
- The development is in close proximity to transit and walking distance to a range of employment, commercial, and institutional uses.
- The development provides safe pedestrian circulation within the site through the provision of sidewalks and the adoption of the universal principles of CPTED.
- The development conforms to the standards and regulations of the AODA and the Ontario Building Code.
- The development contemplates a variety of planting arrangements that provide coherence and unity, which are provided in detail through the Landscape Plan.

Overall, the development seeks out opportunities to incorporate sustainable design practices within its design.

Section 3.1.4 of the Official Plan provides the City's urban design objectives which are discussed in the table below. It is our opinion that the proposed development meets the City's urban design objectives.

Section 3.1.4	**Assessment**
a) To promote a high standard of urban design that results in an attractive, human-scale city	The proposed development is conceptual in nature, but through future site plan approvals processes it is expected that the development will incorporate a high-quality architectural design and a strong street presence, contributing to a human-scaled and visually attractive built form that enhances the surrounding urban fabric.
b) To respect site context and enhance sense of place that results in compatible	The building massing responds appropriately to the surrounding context through compatible massing, setbacks, and

development and fosters a sense of identity.	materials, enhancing the sense of place and reinforcing the area's emerging identity as a mixed-use, mid-rise neighbourhood.
c) To promote connectivity and interaction that provides universal access for all citizens and emphasizes pedestrian accessibility, safety and comfort across the city	The proposal emphasizes pedestrian connectivity through direct sidewalk access, clear pathways, and barrier-free design, ensuring a safe and comfortable environment for all users while strengthening the connection to nearby transit and community amenities.
d) To promote creativity and innovation that results in interesting streetscapes, building design and architecture, amenity spaces and landmarks in the city.	The detailed architectural elements of the project will be determined at the Site Plan Approval stage.
e) To promote sustainable design that results in more efficient use of resources and energy, reduces heat island effects and reduce the reliance on the automobile.	Sustainable design elements, such as reduced parking supply, active transportation infrastructure, and a compact built form, promote efficient land use, minimize reliance on the automobile, and contribute to broader environmental and energy efficiency objectives.

i. General Urban Design Policies

Section 3.11 of the current Official Plan provides specific policy direction with respect to urban design in the City of Waterloo. As noted in the Section, the City of Waterloo promotes high-quality urban design for both public and private developments to create a memorable, attractive, and livable city with a strong sense of place. Urban design is expected to be considered at all scales from individual sites to the entire city and must align with the Official Plan's urban design objectives, policies, and strategies. As such, the following subsections provide an analysis of the Section 3.11.1 (General Urban Design Policies), and 3.11.2 (Urban Design within Nodes and Corridors Policies) as they pertain to the proposed development.

Section 3.11.1 of the Official Plan provides the General Urban Design Policies, which are intended to support the design objectives established in Section 3.1.4 of the Official Plan and define the primary design elements and expectations that will apply to all development in the City in the public and private realm. The following table provides an analysis of Section 3.11.1 of the Official Plan in relation to the proposed development:

Section 3.11.1	**Assessment**
1) Intensification: In decisions to consider intensification, the City of Waterloo shall address the integration, compatibility, built form (including massing), and relationship of new development to existing buildings and to the surrounding neighbourhood character and context,	The proposed mid-rise mixed-use development introduces compatible intensification through appropriate massing, building articulation, and setbacks that respond

based on the principles of good urban design practice. Policies outlined in this Section may be further augmented through supplemental design policies and guidelines.	sensitively to the surrounding neighbourhood context.
2) Character: To reinforce and maintain the architectural, visual, and thematic integrity of structures, streetscapes, neighbourhoods and planned development by planning and designing new sites, buildings and additions that create and maintain sensitive designs in terms of the planned physical context into which such development is located and through the coordination of design elements. The physical design of the public and private realm shall be coordinated to fit within the existing character and context.	Through the future Site Plan Application stage, the design will reinforce the evolving urban character of the Node through coordinated architectural detailed design and façade treatments that integrate with the existing and planned built form.
3) Views and Vistas: Design that contributes to protects or respects important views and vistas.	The building massing has been arranged to respect surrounding views, with final architectural elements to enhance views and vistas to be addressed at Site Plan Approval.
4) Streetscapes: Streetscape design is the combination and coordination of physical elements that give character to the street, which includes the built form, façade treatment, landscaping and street furnishings within the public and private realm. The City shall promote a coordinated approach to streetscape design that results in an attractive and coordinated character with emphasis given to green and complete streets, pedestrian (and non-vehicular) friendly design, coordinated landscape and building design elements and features that animate the street in the public and private realm. It shall be a general policy of this Plan to discourage blank walls along public streets and to integrate above ground utilities (such as roof top mechanical equipment, hydro transformers and gas meters) away from public view and well screened through the development approvals process.	The development will contribute to an attractive, pedestrian-supportive streetscape along Westhill Drive and Ira Needles Blvd, with detailed façade treatments, landscaping, and utility screening confirmed through Site Plan Approval.
5) Existing Site Features: Identify opportunities to retain prominent site features and vegetation through sensitive or innovative design strategies and to protect adjacent	There are minimal existing features on the subject property, as it is vacant there is little

site features and vegetation on abutting properties through the development review process including, but not limited to, the location and massing of buildings, site grading, landscape and buffer opportunities, tree protection measures and alternative stormwater management strategies.	existing vegetation.
6) Heritage: For building and site design to sympathetically conserve, respect and build upon cultural heritage resources of the City as a whole and the Uptown Waterloo Urban Growth Centre in particular. The City shall encourage sensitive designs for new development in close proximity to prominent heritage resources and Heritage Districts.	Not applicable.
7) Open Space: To facilitate the integration of a linear park and/or open space system which may include a community trail system, into subdivision design and intensification proposals, and where feasible, into the existing central areas of the City and to promote access to the existing or planned open space system.	The proposed development includes on-site amenity and landscaped areas that will connect residents to nearby parks and open spaces, with detailed programming and design finalized at Site Plan.
8) Gateways: A gateway is a special location or entry point that establishes a formal entrance from one area to another. Design sites and buildings with coordinated features and elements at designated gateways, which may include major transportation corridors and major street intersections, to establish a sense of place or identity. Gateways may also include primary entrances into intensification sites and neighbourhoods that contribute towards a distinctive or recognizable character and sense of arrival.	Given the site's visibility along Ira Needles Boulevard, the preliminary concept will allow for refined architectural and landscape gateway features at Site Plan to establish a sense of arrival.
9) Landmarks: A landmark is a building, structure or space that results in a distinctive visual orientation. Place special emphasis on architectural innovation, creativity and quality in all development located in the public and private realm.	The conceptual plans provide an opportunity for architectural expression and high-quality design, which will be further developed through the Site Plan process.
10) Safety and Security: Site and building design that promotes safe, comfortable and accessible environments for all users with emphasis on pedestrians and bicyclists through the universal principles of CPTED (Crime	The building and site layout will incorporate CPTED principles, including natural surveillance and safe pedestrian areas, with

Prevention Through Environmental Design). Design amenity and park spaces to achieve natural surveillance.	lighting and access details confirmed at Site Plan Approval.
11) Site Circulation: Design sites and buildings based on an efficient, safe and integrated circulation system with priority given to pedestrian movements, nonvehicular movements and safe vehicular turning movements. A variety of strategies shall be used to create and define circulation routes and hierarchy. All sites shall provide convenient, direct and safe pedestrian, barrier-free access and cyclist access to building entrances, amenity spaces, the public realm and other important destinations	The concept establishes a logical and safe circulation pattern with priority for pedestrians, while detailed routing, barrier-free access, and cyclist facilities will be finalized through Site Plan.
12) Transit-Oriented Design: Design sites and buildings located along transit routes, and planned transit station areas, to promote transit use, pedestrian and cyclist accessibility, active and interesting streetscapes, human comfort and integrated site amenities	Located near existing transit routes, the development promotes transit use through reduced parking supply, enhanced pedestrian connections, and an urban form that supports active transportation.
13) Universal Design: Promote the adaptation of transportation networks, buildings and lands used by the public to provide barrier-free access and principles of universal design to all citizens and to encourage the use of the International Symbol of Access. Design sites and buildings to establish a standard way finding system within all lands, buildings, and amenities, which are accessible for persons with disabilities. The primary principles of universal design include but are not limited to the following: equitable use; flexibility in use; low physical effort; perceptible information; safety; and, direct and convenient access. A range of design strategies shall be used by the City to achieve universal design objectives such as minimal changes to grade, curb cuts, flush curbing, ramps and contrasting elements. Barrier-free access will be encouraged from the public street, along pedestrian routes, building entrances and other important destinations. Barrier-free access shall be subject to all applicable legislative standards and to local performance standards.	Universal design principles will guide detailed Site Plan elements such as barrier-free paths, entrances, and wayfinding to ensure accessibility for all users.

14) Parking: Reduce the visual impact of parking and urban heat island effect of asphalt through efforts to “green” or soften the urban landscape. A variety of strategies may be required to organize large parking areas into smaller areas. Parking areas shall be designed to provide convenient and direct pedestrian access to major pedestrian destinations. A high level of building design and landscaping shall be required for parking garage structures in public view, and when possible, provide underground parking for intensification projects, particularly residential or mixed-use development.	Parking is located to minimize visual impacts and enhance the landscaped environment, with detailed layout, tree planting, and potential greening measures to be confirmed at Site Plan.
15) Site Servicing Areas: Design sites and buildings with convenient and safe truck access and turning movements. Locate or screen loading and storage areas away from public view and incorporate mitigation strategies to minimize impacts to surrounding uses with priority given to residential properties.	Loading, waste, and service areas will be appropriately screened and located away from public view, with detailed design and turning movements addressed through Site Plan.
16) Outdoor Lighting: All site lighting, when required, shall be designed to create safe outdoor environments and to minimize glare and impact to night sky, public view and surrounding properties.	Lighting will be determined at the Site Plan Approval stage.
17) Signage: Design all site signage to complement and enhance the building and site design. Building signage shall be in scale with the building design and is not to overpower the building façade or obstruct architectural features. Applicable requirements may be further defined through the Urban Design Manual and City’s Sign By-law.	Signage will be determined at the Site Plan Approval stage.
18) Compatible Development: Site and building design that complements and enhances the surrounding neighbourhood character and context through a variety of design strategies including building massing, facade design and landscape coordination. The design of sites and buildings shall also minimize adverse impacts to human comfort, and surrounding properties including outdoor lighting, noise, shadowing, wind and snow disposition through a variety of design strategies and performance standards.	The proposed built form complements the surrounding neighbourhood through thoughtful massing and placement of the building.

19) Human-Scale Development: Development that reinforces human scale dimensions and proportions through design.	The six-storey mid-rise form delivers a human-scaled street interface along both Westhill Drive and Ira Needles Boulevard, with further articulation and pedestrian elements refined at Site Plan.
20) Building Design: Design architecturally well composed buildings that complements and enhances the surrounding neighbourhood character and context. Building design shall also contribute towards an attractive and coordinated streetscape character and towards a sense of place with opportunity for architectural innovation and expression through a variety of design techniques such as architectural features, building materials, colour and other design elements. Buildings shall be designed with prominent building entrances and include strategies to screen roof top equipment from public and residential views. The City will support high quality durable building materials and discourage materials that may fade or deteriorate over time or does not fit within the neighbourhood character or context. The City shall generally discourage flat blank walls and may require specific massing and design strategies that result in a well composed building design, articulated façade design, interesting skyline and compatible development.	The ultimate building design will be determined at the Site Plan Application stage, but will be consistent with the building design guidelines and policies.
21) Accessory structures: Architecturally design accessory buildings and structures such as parking structures, loading areas and garbage enclosures, to complement the primary building design and site design.	Any required accessory structures such as waste enclosures or bicycle storage will be designed to complement the main building and will be finalized at the Site Plan stage.
22) Landscape Design: To design sites with a balanced distribution of hard and soft landscaping that contributes toward a coordinated and enhanced site design, streetscape character, create a sense of place, and an aesthetically pleasing comfortable pedestrian environment. Specific treatment may also be required to address a range of considerations such as screening objectives, landscape buffers to promote land use	The landscape concept provides a balanced mix of soft and hard surfaces that enhance the streetscape and amenity areas, with detailed planting plans completed during Site Plan review. Please refer to the Preliminary Landscape

compatibility, the provision of large canopy trees to provide respite from the sun, streetscape character and opportunity for integrated amenity spaces and sustainable design.	Plan submitted as part of the complete application package.
23) Site Amenities: Design sites and buildings to include a range of on-site amenities such as benches, trash receptacles, bike parking, large canopy trees and/or shade structures to provide for more healthy active outdoor and urban spaces for social gathering, relaxation and enjoyment that results in a higher quality of life.	The proposal includes functional and attractive outdoor amenities such as seating and landscaped areas that promote social interaction and support active living. The programming of these spaces will be determined at the Site Plan Approval stage.
24) Sustainable Design: The City shall promote sustainable design practices in the public and private realm through a variety of strategies, including but not limited to: (a) the adaptive re-use of existing buildings; (b) sustainable design features that address matters of exterior building design; (c) incorporation and integration of trees, shrubs, hedges planting or other ground cover, permeable paving materials, street furniture, curb ramps, waste and recycling containers and bicycle parking in the public and private realm; (d) elements that promote energy reduction or conservation including building and street orientation for passive solar gains; (e) elements that promote improved water and air quality conditions (f) elements that reduce adverse impacts such as urban heat island effect, shadowing, wind and noise; (g) drought tolerant, salt tolerant and native vegetation species; (h) integration of alternative transportation choices; and, (i) the creation of healthy, livable spaces.	Acknowledged and to be determined at the Site Plan Approval stage.
25) Public Art and Culture: Promote the integration and design of public art and cultural elements in the public and private realm that contributes to a sense of place, meaning or context.	Acknowledged and to be determined at the Site Plan Approval stage.

26) Innovation and Creativity: The City shall promote urban design innovation and creativity through the approval process however, it shall be carefully balanced in context of the land use policies of this Plan, as well as, the established Urban Design objectives, Urban Design policies and implementation strategies.	Acknowledged and to be determined at the Site Plan Approval stage.
27) Utilities: Consideration will be given to the location of utilities within the public rights-of-way as well as on private property. Utilities shall be clustered or grouped where possible to minimize visual impact. The City encourages utility providers to consider innovative methods of containing utility services on or within streetscape features such as lamp posts, transit shelters etc., when determining appropriate locations for large utility equipment and utility cluster sites.	Utility placement and screening will be coordinated and consolidated where possible to minimize visual impacts, with final locations determined through Site Plan engineering review.
28) Wayfinding: To design sites and buildings with a range of wayfinding strategies that provide a sense of direction, orientation and convenient accessibility for all users. All sites and buildings shall be designed with clear signage and identification that is fully visible or accessible from the public street, including sites with multiple buildings and users	Clear and accessible wayfinding elements will be incorporated into the final design, including signage, lighting, and logical pedestrian routes, to be confirmed at Site Plan.
29) Priority: To place a greater emphasis on urban design compared to density	The Zoning By-law Amendment establishes an appropriate framework for intensification, with a strong emphasis on achieving high-quality urban design outcomes that will be fully realized during Site Plan Approval.

Based on the table above, it is our opinion that the proposed development aligns with the General Urban Design Policies of Section 3.11.1 in the Official Plan.

ii. Urban Design within Nodes and Corridors

Given the subject lands are designated within a ‘Minor Node’ as per Schedule ‘B’ of the Official Plan, the urban design policies in Section 3.11.2 of the Official Plan apply to the proposed development. It is understood that these policies are further implemented through the Supplemental Guidelines in the Urban Design Manual, which are discussed below in Section 8.b.ii) of this Report. The following table provides an analysis of Section 3.11.2 of the Official Plan in relation to the proposed development:

Section 3.11.2	Assessment
1) Connectivity: Design that promotes connectivity with emphasis on pedestrian and non-vehicular safety, convenience and direct and convenient access to transit routes, amenity spaces, building entrances and public streets. Barrier-free access will be encouraged to building entrances from the public street, particularly along transit routes.	The preliminary site concept promotes connectivity with safe, convenient pedestrian routes, barrier-free access, and direct connections to nearby transit stops, with detailed circulation and access plans to be finalized at Site Plan.
2) Interest: Design which results in visual interest and interesting and active spaces.	The proposed development layout provides opportunities for active, visually engaging spaces along building frontages and amenity areas, with detailed façade articulation and landscaping to be refined at Site Plan.
3) Public Art: Development that incorporates public art that contributes to a sense of place, meaning or local context	While public art is not specifically proposed at this stage, the architectural package includes precedent imagery to guide future design elements that enhance a sense of place and local identity.
4) Infill Development: Design buildings to be in proportion with the lot size and to fit harmoniously into the surrounding character and context. The design of the site and buildings shall be compatible with the surrounding character and context.	The building is designed to fit proportionally on the lot and be compatible with surrounding uses, with final massing, scale, and façade treatments to be confirmed through the Site Plan process.
5) Building Design: The design of buildings shall contribute to a high quality and coordinated streetscape character and context. Buildings should generally have their principle building façade and entrance to face the primary public street particularly along transit routes or transit station areas and be designed with articulated building facades.	The principal façade and building entrance are oriented toward Westhill Drive and Ira Needles Boulevard to create a coordinated streetscape, with articulated facades, materials, and other architectural elements detailed at Site Plan Approval.
6) Built Form and Massing: Locate buildings to establish an urban street enclosure and to frame street intersections. The design and massing of tall buildings (greater than three storeys) shall relate to the surrounding context, as well as, to the street proportions (building height to street width ratio) and	The six-storey mid-rise form establishes an appropriate street enclosure and human-scaled interface while minimizing impacts on adjacent properties, with final massing refinements and articulation addressed at Site Plan.

	to human scale dimensions. The design of high rise buildings shall be designed to reduce adverse impacts related to wind, shadowing, visual impacts and to reduce the appearance of bulk through a variety of design and massing strategies.	
7)	Skyline: Design tall buildings with interesting roof designs, articulated massing and supporting architectural features that create an interesting and recognizable skyline coordinated with other surrounding tall buildings from many views and vantage points. Encourage opportunities to integrate roof top equipment into the roof design and to promote a sculpted roofline.	Not applicable.
8)	Site Amenities: Encourage a range of site amenities for all development and enhanced site amenities for intensification projects and master planned projects.	The development provides on-site amenities including landscaped open spaces, enhancing livability and supporting intensification objectives.

Based on the table above, it is our opinion that the proposed development aligns with the Urban Design within Node and Corridors policies of Section 3.11.2 in the Official Plan.

b) City of Waterloo Urban Design Manual

The City's Urban Design Manual ("UDM") sets out additional policies in order to establish a high standard of urban design in the City. The proposed development falls under the 'General City Design Guidelines' (Part 2 of the UDM), as well as the 'Supplementary Design Guidelines' (Part 3 of the UDM) which includes additional direction with respect to Tall Buildings and Nodes and Corridors. As such, the following subsections review Part 2 and 3 of the UDM with respect to the proposed development.

i. Part 2 – General City Design Guidelines

The 'General City Design Guidelines', being Part 2 of the UDM, implement the City's Urban Design Objectives and Policies for city-wide development located in the public and private realm. The following table provides an analysis of the applicable guidelines as they relate to the proposed development:

Policy Number	Policy	Assessment
2.1.1	Pedestrian-Friendly Design	The proposed development promotes a pedestrian-friendly environment by orienting building entrances toward Westhill Drive and Ira Needles Boulevard, providing clear, barrier-free

		pathways, and ensuring convenient connections to nearby transit stops, sidewalks, and public amenities. Active frontages, landscaped sidewalks, and preliminary streetscape design elements are intended to enhance walkability, encourage pedestrian activity, and integrate the building within the Minor Node context, with final design details confirmed at the Site Plan stage.
2.1.2	Human-Scale Development	The proposed 6-storey building achieves a human-scale form without the need for a podium or stepbacks along both Westhill Drive and Ira Needles Blvd. Its height and massing are compatible with the surrounding context, providing a comfortable streetscape that engages pedestrians while respecting the neighbouring built form.
2.1.3	Compatible Development	The massing, height, and design of the building have been carefully configured to complement the surrounding neighbourhood context, including the adjacent, medium-rise apartments to the north, and higher-density developments nearby, such as 36 Westhill Drive. The final articulation, façade treatments, and landscaping will be further refined at Site Plan to ensure full compatibility with adjacent uses.
2.1.4	Safety and Security	Though these details will be determined during the Site Plan Approval stage, the site and building design prioritize safety through natural surveillance, clear sightlines, well-lit pedestrian pathways, and visible building entrances. These strategies align with CPTED principles.
2.1.5	Transit-Oriented Design	The development supports transit-oriented principles by providing direct and convenient pedestrian access to nearby GRT routes 13, 29, and 202 iXpress, promoting the use of public transit and reducing automobile dependency. The location near major corridors and services enhances connectivity to jobs, schools, retail, and recreation, consistent with a compact, transit-supportive urban form.
2.1.6	Building Design	Architectural elements, materials, and façade articulation will be determined through the Site Plan Approval process. The preliminary concept includes reference images and precedent studies to guide future design while maintaining compatibility with the surrounding context.
2.1.7	Amenity Areas	The development provides approximately 350 m² of indoor amenity space and 100 m² of outdoor amenity space designed

		to support social interaction, recreation, and community engagement. The layout, landscaping, and final programming of these areas will be refined at the Site Plan stage.

ii. Part 3 – Supplementary Design Guidelines

The 'Supplemental Design Guidelines', being Part 3 of the UDM, provides detailed design guidelines for specific types of development such as site service areas, tall buildings and may implement specific land use policies such as the Nodes and Corridors land use designation. The following table provides an analysis of the applicable guidelines as they relate to the proposed development:

Guideline	Assessment
3.2.1. NODES AND CORRIDORS	
3.2.1.3 General Guidelines	
1) Locate buildings close to the street to establish an urban street enclosure based on a minimum height to width ratio of 4:1 and maximum height to width ratio of 1:1. Increased height(s) may be considered on a site-by-site basis subject to shadow impact analysis, articulated massing techniques and context.	The building is oriented close to Westhill Drive and Ira Needles Boulevard to contribute to an urban street enclosure, with final massing, articulation, and shadow mitigation measures to be determined at Site Plan.
2) Design and mass buildings to provide a sense of transition adjacent to low rise neighbourhoods through a graduation in massing or height or sympathetic building design. Where possible, graduate taller building massing and height to the primary streets and intersections away from low rise buildings. Provide additional measures, such as building step-backs, to promote human-scale development.	The building massing provides an appropriate development that considers existing medium and high density development in the area to minimize impacts.
3) Provide higher level of design on gateway corridors and intersections. Emphasize building entrance (prominent building entrance feature) and coordinate front yard landscaping treatment to enhance streetscape theme.	Prominent building entrances and coordinated landscaping along primary street frontages help emphasize the site as a key node, with detailed architectural elements and landscaping to be confirmed at Site Plan.
4) On street corners, position building close to the intersection to accentuate the importance of these prominent locations. Provide stepped massing at street corners and provide opportunities for outdoor amenity areas at intersection.	The building is positioned to address key street intersections, emphasizing prominent corner presence.
5) Design sites to integrate pedestrian activity with public realm. Provide grade access from public street to building entrance.	Direct grade-level pedestrian access from public streets to building entrances is provided, with detailed circulation, barrier-

	free access, and public realm connections refined at Site Plan.
6) Provide amenity areas for all development with emphasis on landscaped entrance areas, landscaped courtyard spaces and urban forecourt spaces. Amenity areas may include hardscape entrance areas, outdoor amenity spaces, publically accessible landscaped areas (including roof gardens) or public art features.	Landscaped and functional amenity areas, including outdoor spaces, are incorporated to support social interaction and enhance the public realm, with details to be finalized at Site Plan Approval stage.
7) Provide public art and design in all development including, but not limited to: • building entrance features or elements; • building signage; • decorative street furniture; • Information plaques on site history or heritage; • stand alone sculptures. • pavement; and, • other elements	Public art to be determined at the Site Plan Approval stage.
8) Investigate opportunities to integrate heritage resources in the Nodes and Corridors Areas and ensure that new development respects the principle of heritage conservation.	Not applicable.
3.2.1.4.a. NODE GUIDELINES (Major + Minor)	
1) Locate building close to the street at major intersections with setbacks that respect the existing or planned character	The building is oriented to address Westhill Drive and Ira Needles Blvd, providing a strong street presence while respecting the existing and planned character of the area. Specific façade treatments will be determined at the Site Plan Approval stage.
2) Locate the greatest height and density towards the primary street intersection, or internal (central) to the site. For mid and high rise buildings, provide a stepped building form at street corners.	The greatest height and density is closest to the intersection, with the 6-storey form located to maximize efficient land use.
3) Provide greater building mass and frontage along streets (build-to lines) in major nodes than in minor nodes.	The building massing is designed to provide an appropriate presence along the street frontage within a Minor Node context, with further detailing of façade articulation to be refined at Site Plan Approval.
4) Encourage mixed-use buildings with second storey residential near existing residential neighbourhoods. Design elevations to complement surrounding residential character.	While the proposed building is primarily residential, the amenity spaces along the Ira Needles Blvd frontage may be utilized for non-residential uses to activate the street.
5) Locate parking in the side, interior or rear yards. Prohibit parking at street corners and minimize parking along street frontage.	Parking is primarily located in rear and structured areas, minimizing exposure along street frontages and avoiding placement at street corners, consistent

		with the City's design guidance.
6)	Establish an integrated circulation system with emphasis on pedestrian circulation. Provide direct and convenient pedestrian access to all pedestrian destinations with emphasis on building entrances and public streets oriented to the street.	The site plan provides direct and convenient pedestrian access to building entrances, amenity spaces, and surrounding streets, emphasizing safe and accessible circulation.
7)	Design buildings to support a consistent and coordinated development theme and streetscape character. Incorporate complementary roof features, building design elements, building materials and signage.	The overall building design, massing, and streetscape concept are intended to support a cohesive development theme. The future roof elements, façade treatments, materials, and signage will be determined at Site Plan Approval, guided by the reference and precedent images included in the architectural package.
8)	Provide enhanced buffers adjacent to low rise neighbourhoods.	Not applicable.

9. SUPPORTING STUDIES

This section of the Report provides a summary of the supporting studies submitted as part of a 'complete application' package, per the Pre-Consultation Record provided by City Staff. A summary of the key findings and conclusions from each study is included below. It is also recommended that the reader review each study/report in their entirety, which are included as part of the submission package.

a) Transportation Impact Brief

A Transportation Impact Brief (TIB) was prepared by Paradigm Transportation Solutions Limited and is dated June 23, 2025. The Region of Waterloo retained Paradigm to evaluate the forecast traffic impacts of the proposed six-storey, 56-unit development, assess its access arrangements, and identify any necessary mitigation measures. The scope was developed in consultation with the Region and the City of Waterloo, following the Region's Transportation Impact Study Guidelines.

The TIB assessed existing traffic conditions, projected background growth to 2030, and estimated site-generated trips using ITE Trip Generation rates for mid-rise multi-family housing. The development is forecast to generate 13 trips in the AM peak hour and 22 trips in the PM peak hour. Analysis showed that all study area intersections would operate within acceptable levels of service under existing, background, and total traffic conditions, with minimal increases in delay (two seconds or less). A right-in/right-out (RIRO) driveway to Ira Needles Blvd was determined necessary to accommodate site grading and to enable underground parking, in addition to a full-moves access to Westhill Drive. No concerns were raised with respect to the proposed access along Ira Needles Blvd based on the report's findings.

Paradigm also evaluated active transportation and transit access, noting that the site is well served by sidewalks, cycle lanes, nearby commercial amenities, and multiple GRT stops within a short walking distance. Transportation Demand Management measures were recommended, including pedestrian-friendly landscaping, accessible sidewalks, bicycle parking (34 spaces total), and resident travel information packages promoting sustainable transportation options.

The report concluded that the proposed development can be supported from a transportation perspective, provided that it includes both the full-moves Westhill Drive access and the RIRO Ira Needles Blvd access, along with the recommended bicycle parking supply and integration of active transportation connections.

b) Functional Servicing and Stormwater Management Report

A Functional Servicing and Stormwater Management Report (FSR/SWM Report) was prepared by WalterFedy and is dated April 8, 2025. The purpose of the report was to evaluate the feasibility of providing municipal water, sanitary, and storm servicing for the proposed six-storey, 56-unit affordable housing development, and to outline preliminary stormwater management (SWM) strategies in accordance with City of Waterloo, Region of Waterloo, and Ministry of the Environment, Conservation and Parks (MECP) requirements.

The FSR/SWM Report reviewed existing servicing infrastructure in the surrounding network. Municipal water servicing is proposed via connections to existing main on Westhill Drive and

municipal sanitary connections along Ira Needles Blvd, with capacity analysis confirming adequacy for the proposed development. For stormwater management, WalterFedy recommended a combination of rooftop flow controls, underground storage, and controlled outlet discharge to the municipal storm sewer to maintain pre-development peak flows and achieve enhanced water quality control per MECP standards.

Recommendations included confirming final servicing connection points with the City and Region, completing detailed internal servicing design, implementing erosion and sediment control measures during construction, and applying low-impact development best practices where feasible. The report concluded that the proposed development can be adequately serviced for water, sanitary, and stormwater, and that the preliminary SWM plan will satisfy applicable regulatory criteria.

c) Environmental Noise Study

An Environmental Noise Study was prepared by JPE Engineering and is dated March 17, 2025. The purpose of the study was to assess potential noise impacts from surrounding transportation sources, specifically road traffic along Ira Needles Blvd and Westhill Drive, on the proposed six-storey, 56-unit affordable housing building, and to recommend noise control measures to ensure compliance with the MECP guidelines and City of Waterloo requirements.

The study involved on-site noise measurements and computer modelling to predict future noise levels at the development's façades, amenity areas, and outdoor living spaces. Results indicated that daytime and nighttime noise levels from traffic on Ira Needles Blvd would exceed MECP sound level limits at certain building façades and outdoor amenity areas. Noise levels from Westhill Drive were found to be lower but still required consideration for façade design.

JPE Engineering recommended a combination of noise mitigation measures, including Warning Clauses (per NPC-300) in the Development Agreement, upgraded building components (e.g., enhanced wall and window assemblies), mechanical ventilation systems to allow windows to remain closed while maintaining indoor air quality, and localized acoustic barriers for outdoor amenity areas. The study concluded that with the recommended mitigation measures in place, the proposed development can meet applicable MECP and City of Waterloo noise criteria, providing an acceptable acoustic environment for future residents.

d) Stage 1 and 2 Archaeological Assessment

A Stage 1 and 2 Archaeological Assessment was completed by Archaeological Services Inc. (ASI) and is dated August 18, 2025. The Stage 1 background study reviewed Indigenous and Euro-Canadian land use, historic mapping, local settlement history, and the presence of nearby registered archaeological sites. This research concluded that while the property had limited potential for Indigenous resources, there was some potential for Euro-Canadian archaeological remains given its location within the historic German Company Tract and proximity to a former settlement road.

To address this potential, a Stage 2 field assessment was carried out on July 10, 2025, using a test pit survey across all accessible areas of archaeological potential. Approximately 93% of the site was assessed, with the remainder identified as disturbed from past grading, road

construction, and sidewalk installation. All test pits revealed multiple layers of modern fill and extensive prior disturbance, with no intact archaeological deposits present. No cultural material or features were encountered during the survey.

Based on these findings, ASI determined that the subject property does not contain any archaeological resources and has been sufficiently disturbed to remove any remaining potential. ASI therefore recommends that no further archaeological assessment of the property is required.

10. PUBLIC CONSULTATION STRATEGY

This section of the Report provides an overview of the proposed public consultation strategy with regard to the proposed development. The *Planning Act* (O. Reg. 544/06, as amended by O. Reg. 178/16) provides that applicants are required to include a proposed public consultation strategy as part of a 'complete' application submission.

The applicant proposes that the public consultation process for the Zoning By-law Amendment application adhere to the statutory requirements outlined in the *Planning Act*. Additionally, an informal public meeting may be held early in the process, ahead of the statutory public meeting.

The proposed public consultation process is as follows:

- A Statutory Public Meeting: Advertised by the City and held by Council.
- Direct Written Responses to Public Comments: Direct written responses to feedback received during the consultation process will be provided to City Staff for review and incorporation into the City Staff Report.
- An Informal Public Meeting: This Neighbourhood Meeting will be organized by Up Consulting if deemed necessary based on the nature of the feedback received.
- Preparation of the City Staff Report: The report, along with any supporting technical studies and reports, will be made available to the public prior to City Council's review of the application. It is expected that City Staff will post this information, including the City Staff Report, on the City's website for public access.
- Council Meeting: Council will review the City Staff Report, supporting documentation, and public input before making a final decision on the application.

The proposed consultation strategy aims to provide members of the public with the opportunity to review, understand, and provide feedback on the Zoning By-law Amendment Application. The consultation strategy will be coordinated with City Staff and additional opportunities for consultation will be considered and may be warranted based on the input received.

11. CONCLUSION

This Report provides an assessment of the proposed development and development applications for the property known municipally as 41 Westhill Drive, Waterloo, which includes a discussion on 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, supporting studies, and public consultation strategy.

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*, and 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,

up consulting

David Galbraith MCIP RPP
President, UP Consulting

Christian Tsimenidis MCIP RPP
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 41 Westhill Drive, 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 herby further amended by rezoning the lands described as GERMAN COMPANY TRACT Part Lot 40 RP 58R14437 Parts 5 and 6, municipally known as 41 Westhill Drive, Waterloo and identified on the attached Schedule 'A', from R9 (Residential Nine) to RMU-20-XX (Residential Mixed Use 20 – Site Specific).

---

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

   7.10.X – RMU-20-XX (41 Westhill Drive)

   Notwithstanding the regulations of the RMU-20 zone, the following site-specific provisions shall apply to the lands zoned RMU-20-XX:

   a) In addition to the provisions of the RMU-20 zone, the following provisions shall be applicable:
      - Rear Yard Setback (Minimum): 5.0 metres
      - Parking (Minimum): 0.75 space / dwelling unit
   b) All other regulations of the RMU-20 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.