PLANNING JUSTIFICATION & URBAN DESIGN REPORT REV. 1 [05-12-2026]

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 resubmission ("Resubmission No. 1") for a 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 December 2025, a Zoning By-Law Amendment was submitted 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.

Since the original submission and following comments received to date, the Zoning By-law Amendment requests remain the same as the original submission, with the exception of an additional Site-Specific Provision identified by City Staff to permit maximum streetline setback that is at least 25% of the street line front building façade within 7.5 metres of the streetline, whereas the Zoning By-law requires 75%. The proposal continues to reflect the same built form and density as previously submitted. Minor refinements have been made in response to City Staff comments, including an increase to the structured parking side yard setback from 2.6 metres to 3.0 metres to achieve conformity with the Zoning By-law.

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 residential development supporting units at an affordable rental rate. 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 an affordable housing requirement. 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 2
3. CONTEXT ANALYSIS 5
4. OVERVIEW OF PROPOSED DEVELOPMENT 7
    i. Proposed Structured Parking and Access 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 28
    d) City of Waterloo Official Plan 29
    i. Land Use Designation – Medium Rise Residential 30
    ii. Built Form – Medium Rise, 6 Storeys 32
    iii. Nodes and Corridors – Minor Node 32
    iv. Source Water Protection Area 36
    v. Urban Design 36
    e) City of Waterloo Zoning By-Law 2018-050 36
7. LAND USE PLANNING RATIONALE 41
    a) Alignment with Overarching Planning Framework 41
    b) Efficient Use of Infrastructure and Municipal Servicing 41
    c) Appropriate Massing, Built Form, and Density in a Minor Node 42
    d) Reduced Minimum Parking Ratio 42
    e) Reduced Minimum Rear Yard Setback 43
    f) Reduced Streetline Setback for Building Façade 43
8. URBAN DESIGN REVIEW 45
    a) City of Waterloo Official Plan 45
    b) City of Waterloo Urban Design Manual 50
    i. Part 2 – General City Design Guidelines 50

ii. Part 3 – Supplementary Design Guidelines 51
9. SUPPORTING STUDIES 54
a) Transportation Impact Brief 54
b) Functional Servicing and Stormwater Management Report (Revised) 54
c) Environmental Noise Study (Revised) 55
d) Stage 1 and 2 Archaeological Assessment 56
10. PUBLIC CONSULTATION STRATEGY 57
11. CONCLUSION 58
APPENDIX A 59

TABLE OF FIGURES

Figure 1: Location of Subject Property (Source: Region of Waterloo GIS Portal) 2
Figure 2: Streetview of the Subject Property from Westhill Hill Drive Facing West (Source: Google Maps) 3
Figure 3: Streetview of the Subject Property from Ira Needle Boulevard Facing East (Source: Google Maps) 3
Figure 4: Streetview of the Subject Property from the intersection of Westhill Drive and Ira Needle Boulevard Facing North (Source: Google Maps) 4
Figure 5: Neighbourhood Context Map (Source: Region of Waterloo GIS Portal) 6
Figure 6: Conceptual Site Plan (Source: McCallum Sather) 7
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) with the Subject Property indicated with Red Star 31
Figure 14: City of Waterloo Official Plan - Schedule 'B1' (Built Form) with the Subject Property indicated with Red Star 32
Figure 15: City of Waterloo Official Plan - Schedule 'B' (City Structure) with the Subject Property indicated with Red Star 33
Figure 16: City of Waterloo Interactive Zoning By-law Map 37

1. INTRODUCTION

This Report has been prepared as part of the resubmission for a Zoning By-Law Amendment application pertaining to 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;
- Permit a maximum streetline setback that is at least 25% of the street line front building façade within 7.5 metres of the streetline, whereas the Zoning By-law requires 75% ; 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.

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 at 13-storeys in height and stacked townhouses.

To the east of the lands is 36 Westhill Drive which contains a single-detached dwelling and open space. An Official Plan Amendment and Zoning By-law Amendment were recently approved by Council in March 2026, whereby the applicant is proposing to develop the site with a 6 storey apartment building containing 140 dwelling units (200 bedrooms). 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 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.

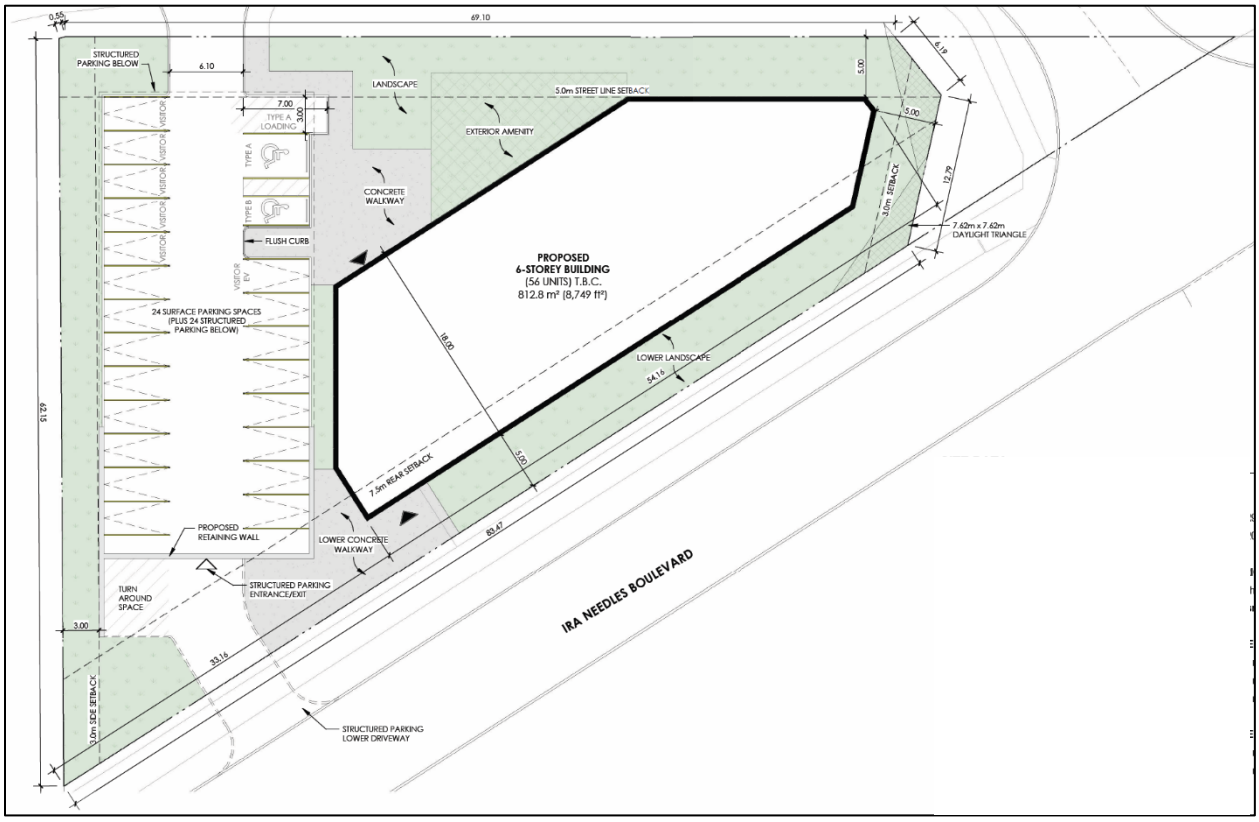

Figure 6: *Conceptual Site Plan (Source: McCallum Sather)*

This project is being advanced as part of the Region's "Building Better Futures Initiative". The Region intends to advance the development with a development partner, to bring forward a residential development supporting units at an affordable rental rate. 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. 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. Two (2) accessible parking spaces (1 Type A and 1 Type B) are provided at the surface parking level, all located in close proximity to the building to support ease of access. One (1) Type A Loading Space is also provided for the residential component for service or delivery vehicles in accordance with the Zoning By-law.

The City of Waterloo 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.e) 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. The exact size and programming of amenity space will likely change at the Site Plan Application stage, however, it will be provided in accordance with municipal requirements.

Overall, the revised submission maintains the core elements of the originally proposed development, with no changes to the total number of dwelling units or bedroom count, parking supply, or the building's height and overall massing. The proposal continues to reflect the same built form and density as previously submitted. Minor refinements have been made in response to Staff comments, including an increase to the structured parking side yard setback from 2.6 metres to 3.0 metres to achieve conformity with the Zoning By-law.

i. Proposed Structured Parking and Access

As previously outlined, the proposed development incorporates structured parking, accessed from Ira Needles Boulevard, in lieu of underground parking. This approach represents a deliberate and context-responsive design decision that reflects the site's physical constraints and overall development efficiency.

A key factor in selecting structured parking over underground parking is the significant grade differential across the subject property, which slopes downward from east to west toward Ira Needles Boulevard. While this condition allows the structured parking to be partially integrated into the lower portion of the site, the same topographic conditions would substantially increase the complexity, depth, and cost of a fully underground parking solution. Underground parking in

this context would require extensive excavation and more complex ramping systems to navigate the grade, resulting in greater construction impacts and reduced overall efficiency.

In contrast, the proposed structured parking solution takes advantage of the existing site grading by embedding parking within the lower portion of the site while maintaining a more direct and efficient relationship to the public realm and primary access point along Ira Needles Boulevard. This reduces the extent of excavation and minimizes the need for large-scale below-grade construction, while still achieving an efficient parking supply.

The structured parking approach also provides important functional benefits in terms of site planning and built form efficiency. It enables the development to accommodate the required parking supply in a consolidated manner while preserving more of the surface area for building footprint, landscaped open space, amenity areas, and pedestrian-oriented design elements. Given the limited size and triangular configuration of the parcel, an underground parking solution would introduce additional constraints that would further reduce flexibility in site layout and building placement, particularly in the context of the proposed affordable housing development and the reduced parking ratio being requested through the Zoning By-law Amendment application.

Accordingly, the structured parking approach represents a more efficient and practical land use response that balances development feasibility, cost considerations, and planning objectives related to compact urban form, intensification, and high-quality site design.

With respect to access from Ira Needles Boulevard, the proposed access configuration has been reviewed through the submitted Transportation Impact Brief prepared by Paradigm and in consultation with Regional Transportation staff. As part of the Region's revised comments dated April 15, 2026, Regional staff confirmed that their position regarding the proposed access arrangement remains unchanged and that the access continues to be considered appropriate from a technical and transportation planning perspective. Accordingly, it is our opinion that the proposed parking and access strategy represents a logical and well-considered response to the site constraints and operational requirements of the development.

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.

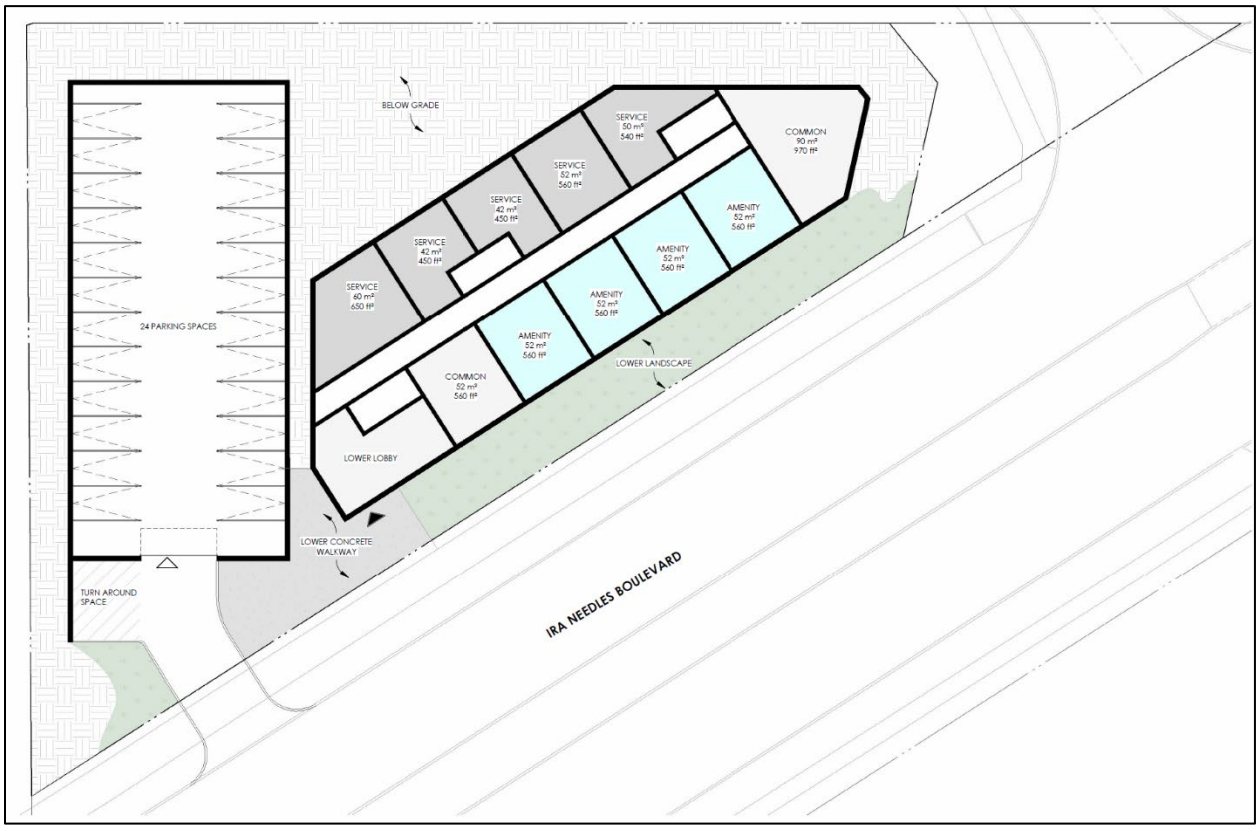

Figure 7: *Level 1 Floor Plan – Preliminary Design (Source: McCallum Sather)*

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.

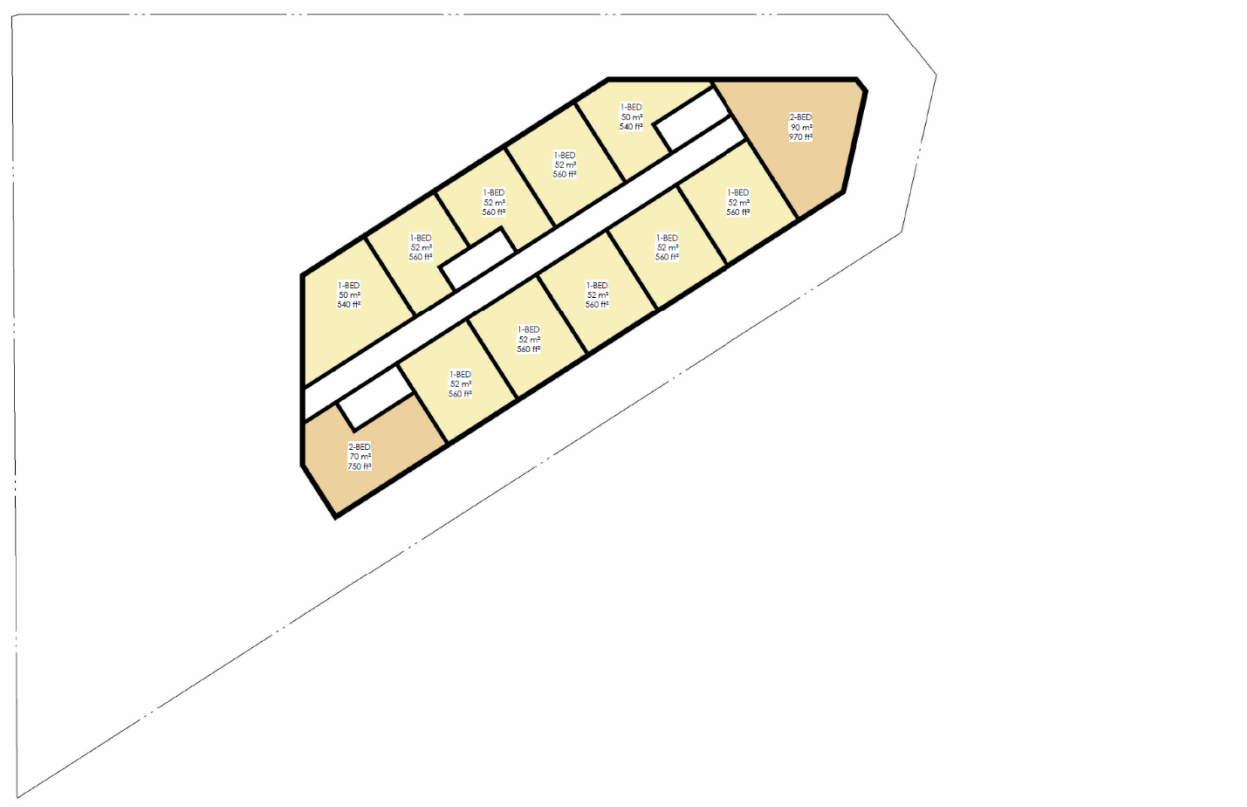

Figure 9: *Level 3-6 Floor Plan – Preliminary Design (Source: McCallum Sather)*

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.

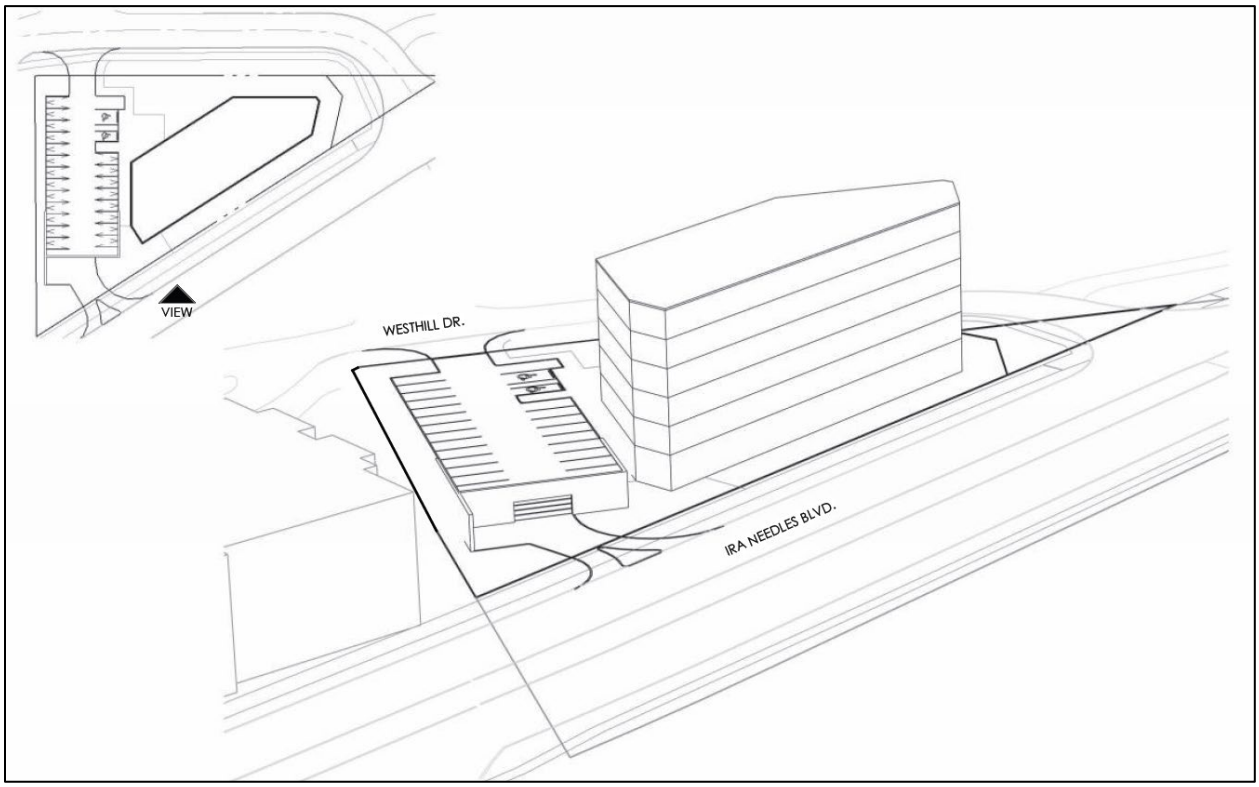

Figure 10: *Preliminary Massing Model of Proposed Development with View from the East (Source: McCallum Sather)*

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;
- Permit a maximum streetline setback that is at least 25% of the street line front building façade within 7.5 metres of the streetline, whereas the Zoning By-law requires 75% ; 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 residential development supporting units at an affordable rental rate.
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) The Region is proposing a residential development supporting units at an affordable rental rate. The Region will issue a Request for Proposal for a development partner to build out the site with specific criteria.
Housing		
2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; b) permitting and facilitating: i. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and ii. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites.	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 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 affordability needs in Waterloo, contributing to social and economic well-being through the provision of new rental housing opportunities.

	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.	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) The site will be fully serviced by

	b) optimize existing and planned infrastructure and public service facilities;	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 residential development supporting units at an affordable rental rate, 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; e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water	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.

	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.

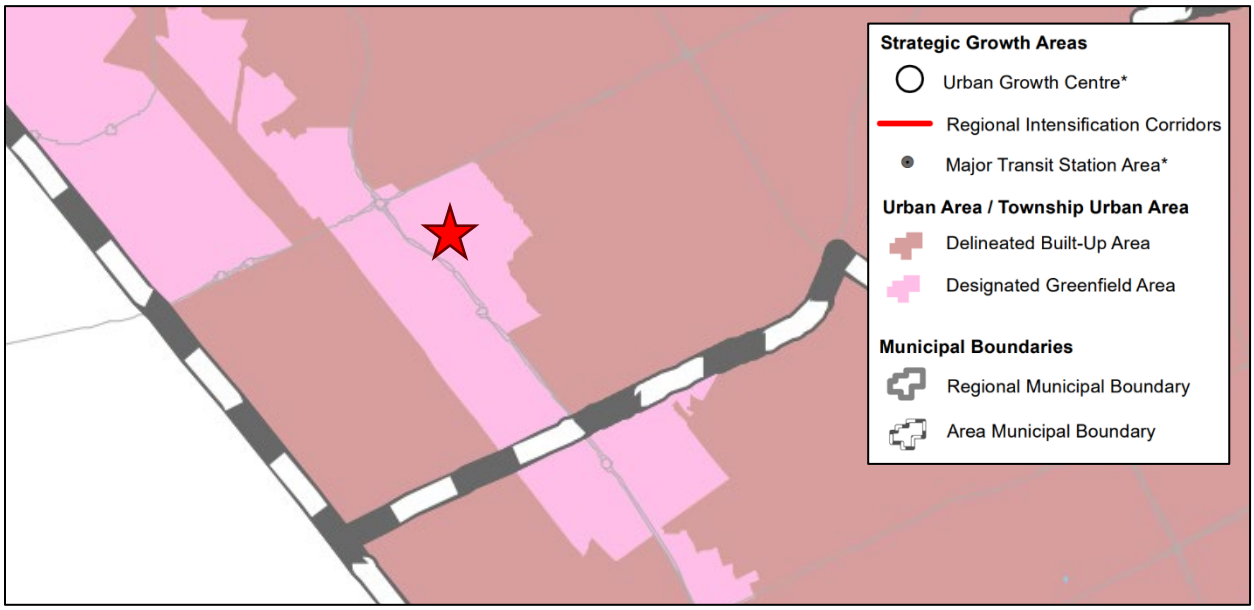

Figure 11: *Region of Waterloo Official Plan – Map 2 (Urban System) with the Subject Property indicated with Red Star*

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 residential development supporting units at an affordable rental rate, with a mix of one- and two-bedroom 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." 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.

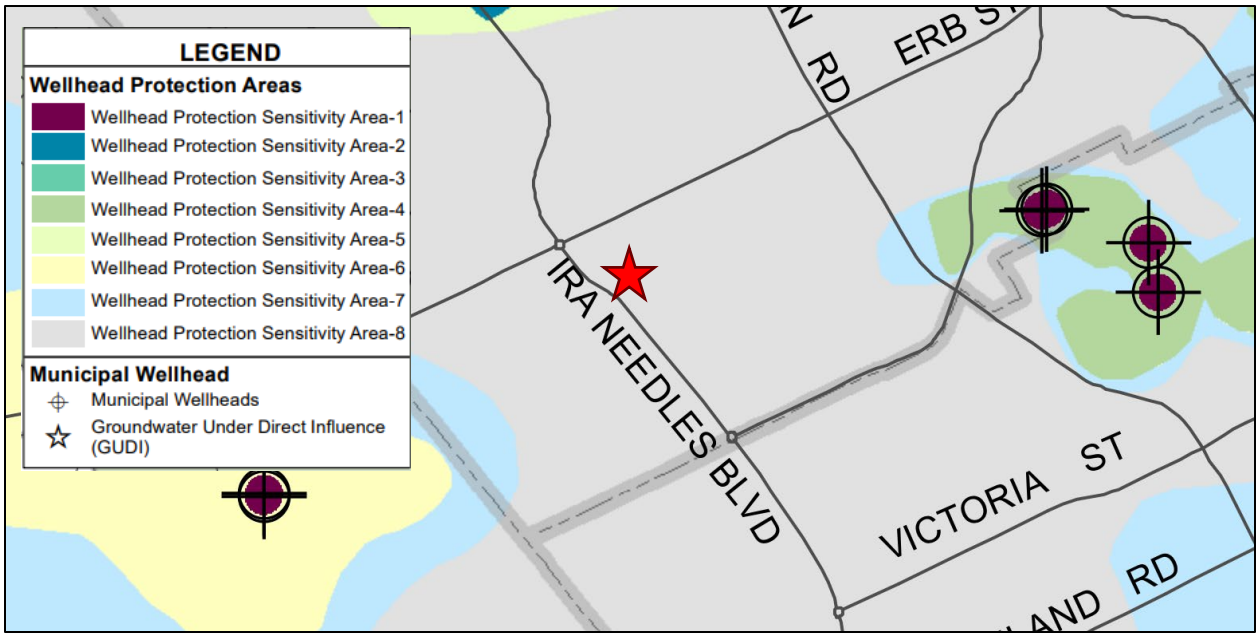

Figure 12: *Region of Waterloo Official Plan – Map 6a (Urban Area Source Water Protection Areas) with the Subject Property indicated with Red Star*

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.

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, as the Province approved Official Plan Amendment No. 58 (OPA 58) on December 17, 2025. The effect 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). Therefore, OPA 58 is currently in-force and effect.

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 – Medium Rise Residential

The subject property is designated ‘Medium Rise Residential’ in Schedule ‘A’ of the Official Plan (Figure 13). 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.

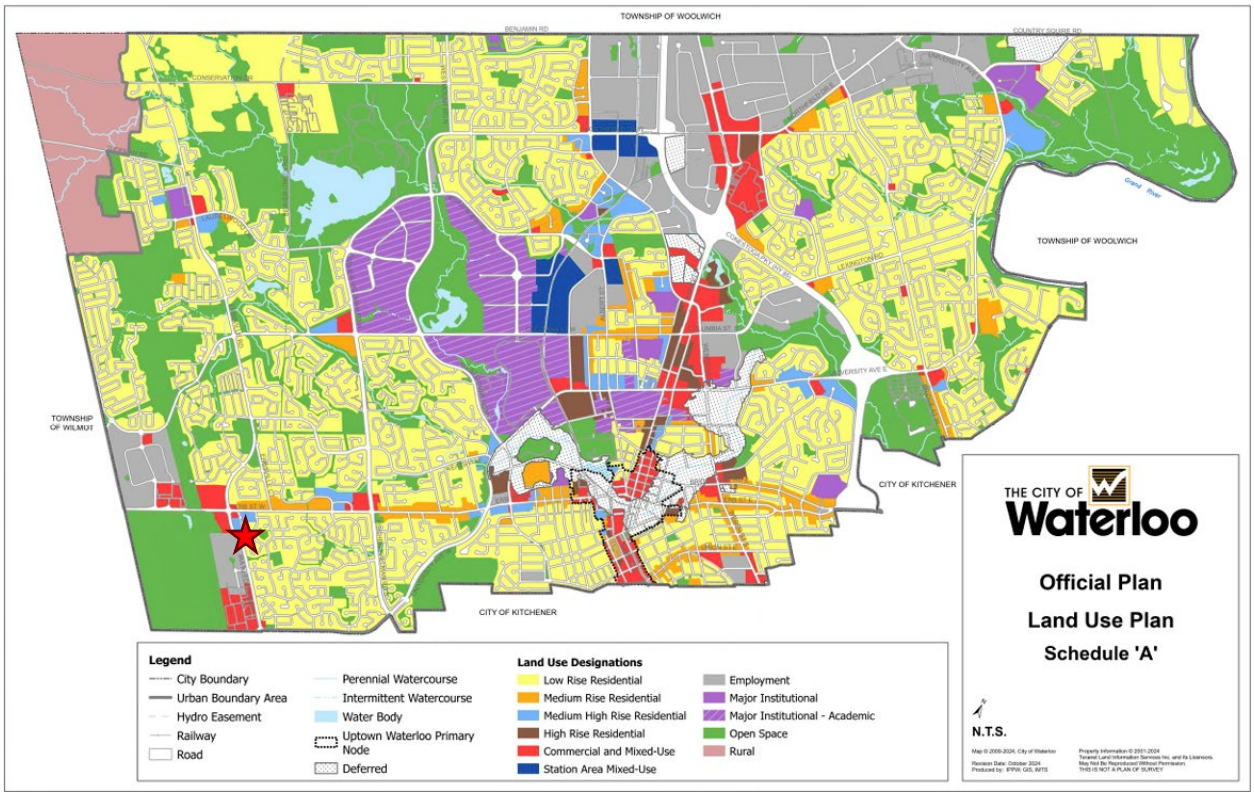

Figure 13: *City of Waterloo Official Plan - Schedule 'A' (Land Use Plan) with the Subject Property indicated with Red Star*

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

Section 10.1.4(3) of the Official Plan, the maximum height of any building shall not exceed 6-storeys. As part of OPA 58, it is understood that density requirements were removed from the Official Plan and are directed by the implementing Zoning By-law. As such, the proposed maximum height of 6 storeys would conform with this policy.

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. Built Form – Medium Rise, 6 Storeys

The subject property is designated ‘Medium Rise, 6 Storeys’, as per Schedule ‘B1’ of the Official Plan (Figure 14). As per Section 3.4(1)(c) of the Official Plan, the maximum permitted height on the subject property is 6 storeys within this designation. These policies are further reinforced in Section 10.1.4(3) of the Official Plan (as noted above in this Report) for the overarching ‘Mixed-Use Medium Density Residential’ designation.

The proposed development contemplates a height of 6 storeys. Therefore, the proposed development conforms to the height / built form policies of the Official Plan, and an Official Plan Amendment is not required.

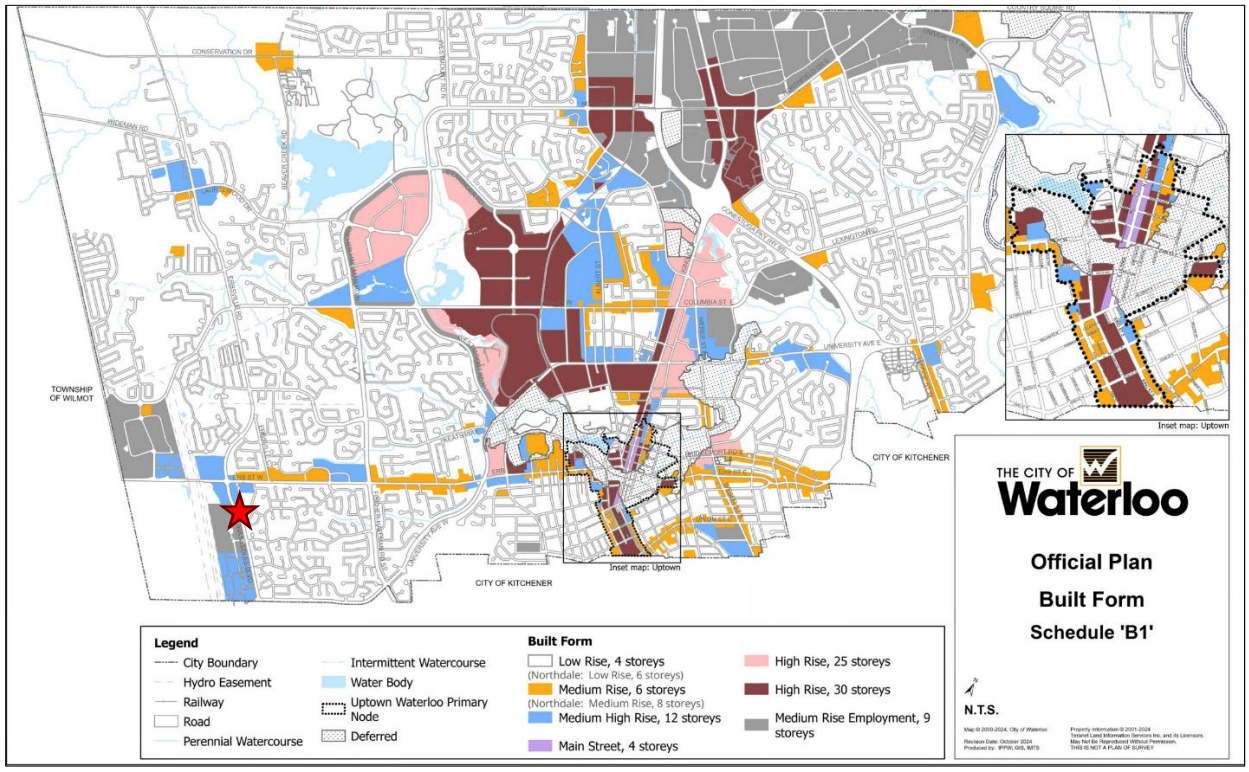

Figure 14: *City of Waterloo Official Plan - Schedule ‘B1’ (Built Form) with the Subject Property indicated with Red Star*

iii. Nodes and Corridors – Minor Node

The subject property is be designated ‘Minor Node’ in Schedule ‘B’ of the Official Plan (Figure 15).

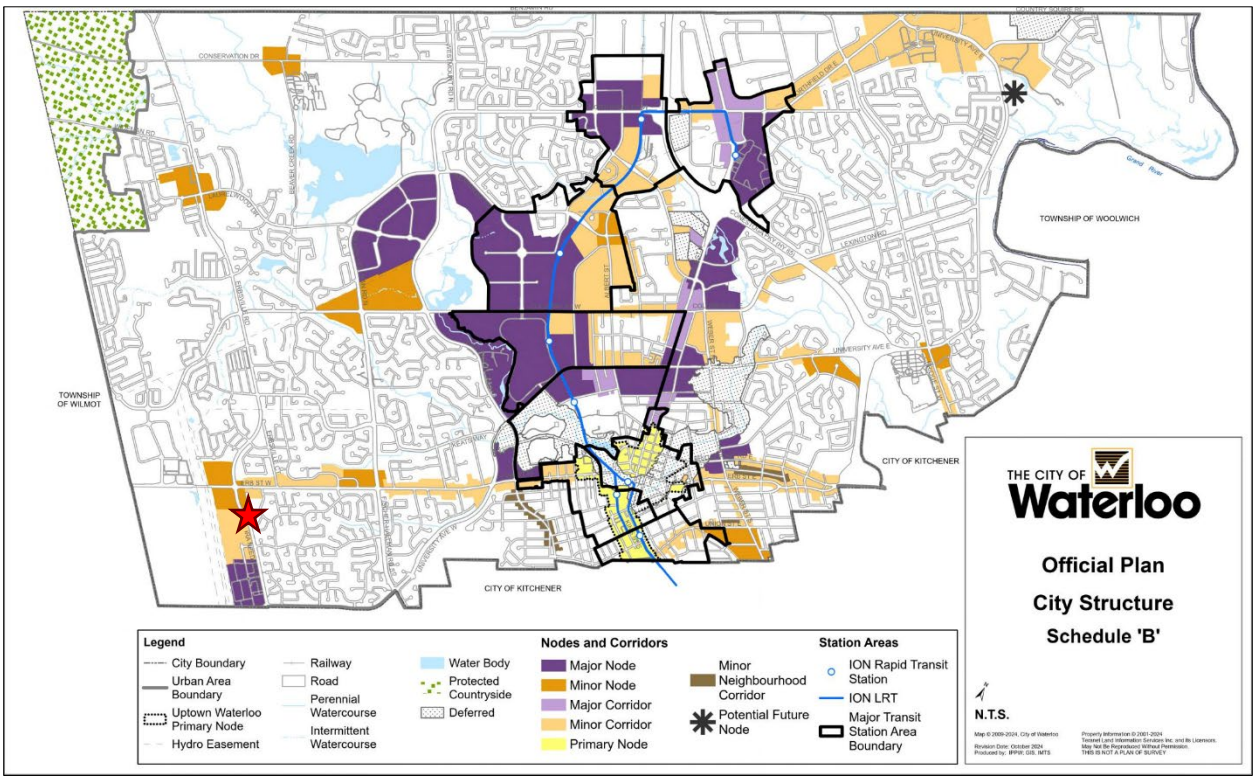

Figure 15: *City of Waterloo Official Plan - Schedule 'B' (City Structure) with the Subject Property indicated with Red Star*

Section 3.5.1(3) of the Official Plan directs that 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 Rise Residential areas, height and/or density will be limited as defined by this Plan and the Zoning By-law.

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. 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 3.5.4 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 strongly encouraged within designated Nodes, Corridors and Major Transit Station Areas, 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, Corridors and Major Transit Station Areas will accommodate a full mix of uses and direction will be provided in this regard through the land use designations applied to the lands.	The subject property is located within a designated Minor Node, where the Official Plan encourages compact and intensified forms of development that support complete communities and efficient use of land and infrastructure. While the proposed development is primarily residential in nature, it contributes to the broader mixed-use function of the Node by introducing additional residential density in close proximity to existing commercial, retail, institutional, and recreational amenities. Further, the subject lands are designated "Medium Rise Residential", which contemplates medium-density residential development as the primary land use. Accordingly, the proposed development represents an appropriate form of residential intensification that aligns with the planned function of the Node and conforms to the applicable land use designation policies of the Official Plan.
(2) High Rise, Medium-High Rise and Medium Rise land uses will primarily be located in designated Nodes, Major and Minor Corridors, and Major Transit Station Areas, and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses. However, Low Rise land uses will be maintained in Minor Neighbourhood Corridors.	The proposed 6-storey residential building represents an appropriate medium-rise built form within a designated Minor Node and directly aligns with the Official Plan's direction to locate higher density residential uses in proximity to major roads, transit infrastructure, and supporting community amenities. The subject property is situated at the intersection of Westhill Drive and Ira Needles Boulevard, with convenient access to surrounding commercial plazas, parks, community facilities, and multiple Grand River Transit routes, including Route 13, Route 29, and the 202 iXpress service. The proposed development efficiently utilizes this strategic location by introducing additional residential density in an area intended to accommodate intensification and transit-supportive growth.
(3) Construction of new low rise uses will be discouraged within designated Nodes, Major and Minor	The proposed development strongly aligns with the Official Plan's objective of discouraging new low-rise forms of development within designated Nodes and

Corridors and Major Transit Station Areas. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter.	Corridors. Rather than a low-density development pattern, the proposal introduces a compact 6-storey residential building that efficiently utilizes an underdeveloped parcel within the Urban Area Boundary. The development contributes to the evolving urban character of the surrounding area, which already contains existing and approved mid-rise and high-rise residential developments along Westhill Drive and Ira Needles Boulevard, and supports the City's broader objectives related to intensification, housing supply, and efficient infrastructure utilization.
(4) Intensification of existing low rise housing to higher density multiple residential buildings will be encouraged in designated Nodes, Corridors and Major Transit Station Areas by the application of minimum densities on residential lands, where applicable	The proposed development represents an appropriate form of residential intensification within a designated Minor Node by introducing a medium-density multiple residential building on lands capable of accommodating additional growth. Although the subject property is currently vacant, the proposal contributes to the broader policy objective of directing intensification toward strategically located lands within Nodes and Corridors that are well served by municipal infrastructure, public transit, and community amenities.
(5) Minor Neighbourhood Corridors shall be zoned to permit a range of more intensive Low Rise residential uses including but not limited to: stacked townhouses and low rise apartments, as well as converted dwelling houses and Additional Residential Units (see policy 10.1.2 of this Plan). The implementing Zoning By-law and/or other guiding documents may further articulate and control the design of development within a Minor Neighbourhood Corridor to ensure that the intent of this Plan is achieved, and development is compatible with and provides an appropriate transition in relation to adjacent land uses.	Not applicable.
(6) In planning for more intensive low rise, medium rise, medium high rise	The subject property possesses sufficient lot area and frontage to appropriately accommodate the proposed

and high rise housing sites, and to assist in the achievement of planned densities in a given area, the Zoning By-law may identify minimum lot sizes and other performance standards in designated Nodes, Corridors and Major Transit Station Areas that encourage lot consolidation and discourage the division of land intended for multiple unit housing forms.	medium-rise residential development. The parcel contains approximately 2,835 square metres of land area with significant frontage along both Westhill Drive and Ira Needles Boulevard, allowing the site to support a compact multiple residential building while accommodating parking, landscaping, amenity space, servicing, and pedestrian circulation. The proposal represents an efficient and comprehensive development of the lands and supports the Official Plan's objective of achieving planned densities within designated Nodes and Corridors.
(7) The City, in consultation with the Municipal Heritage Committee, encourages adaptive reuse of historically significant built heritage resources, and requires the conservation of cultural heritage resources in all areas of the City, including designated Nodes, Corridors and Major Transit Station Areas.	Not applicable.

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 in Section 3.9.3 of the Official Plan. 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 Zoning By-Law 2018-050

The subject property is currently zoned 'Residential Nine' (R9) in the Zoning By-law, as shown in Figure 16 below.

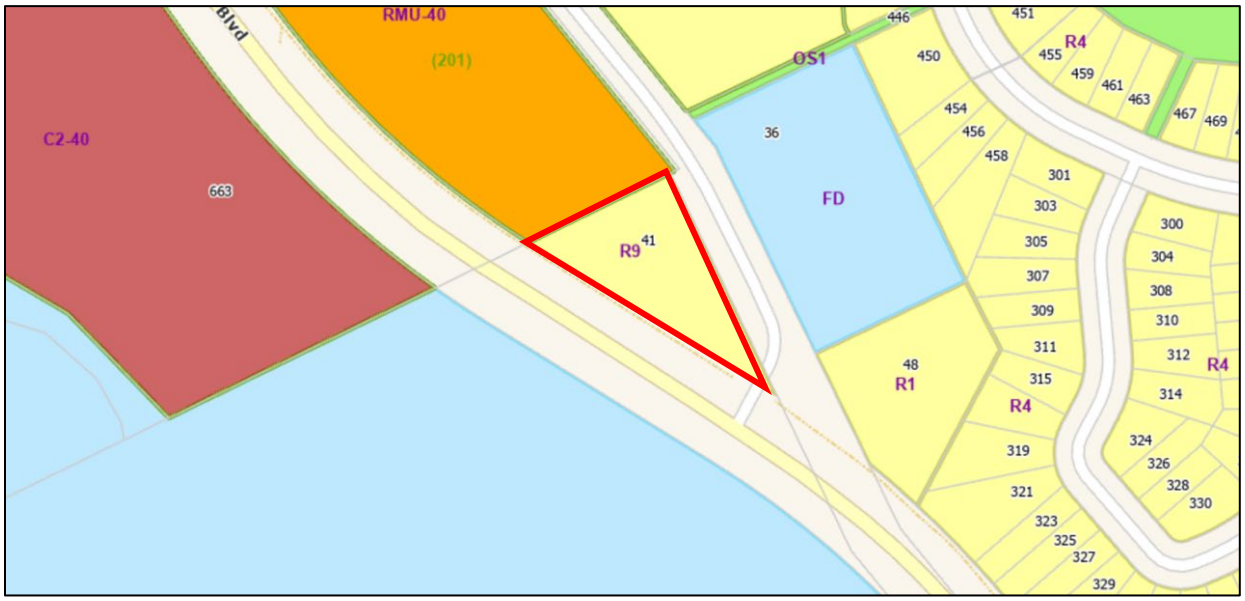

Figure 16: *City of Waterloo Interactive Zoning By-law Map*

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 metres (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	**25%**

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 and 6-storeys
DENSITY (maximum)	450 BEDROOMS per hectare	230 bedrooms per hectare (65 bedrooms / 0.28343 ha.)
LANDSCAPED OPEN SPACE (minimum)	30%	34%
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 m²
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 behind the FRONT YARD BUILDING LINE and the FLANKAGE YARD BUILDING LINE.	Provided behind front 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.
6.2.2	Notwithstanding anything to the contrary, UNDERGROUND PARKING shall be permitted to extend to the SIDE LOT LINE and the REAR LOT LINE	3.0 metres
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;
- Permit a maximum streetline setback that is at least 25% of the street line front building façade within 7.5 metres of the streetline, whereas the Zoning By-law requires 75% ; 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.

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.

At 36 Westhill Drive, immediately east of the subject lands, a concurrent Official Plan Amendment and Zoning By-law Amendment application were approved by Council in March 2026 for a 6 storey apartment building, 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.

f) Reduced Streetline Setback for Building Façade

The proposed Site-Specific Provision to permit a maximum streetline setback whereby at least 25% of the street line front building façade is located within 7.5 metres of the streetline, whereas

the Zoning By-law requires 75%, is appropriate and justified in the context of the subject property and overall development concept.

The requested relief is primarily driven by the unique triangular configuration and irregular geometry of the subject property, which creates inherent site design constraints that limit the ability to achieve a continuous building façade along Westhill Drive while also accommodating a functional building layout, surface parking configuration, access requirements, grading conditions, servicing, and appropriate transitions to surrounding properties.

In addition, the subject property experiences a notable grade change sloping downward from east to west, which has informed the proposed parking and access arrangement. The structured parking is accessed from Ira Needles Boulevard at the lower grade, while the surface parking and primary residential access are accommodated from Westhill Drive at the upper grade. This arrangement represents an efficient and contextually appropriate response to the site's topography and allows the development to minimize excessive grading impacts, and circulation conflicts.

Despite the requested relief, the proposed development continues to establish an appropriate and active relationship with the public realm along Westhill Drive. The building includes a principal entrance, amenity areas, pedestrian connections, landscaping, and at-grade residential interface elements oriented toward the street, helping maintain an attractive and pedestrian-supportive streetscape.

Further, the intent of the Zoning By-law regulation is to ensure buildings are oriented toward the street and contribute to a defined and animated public realm. In our opinion, the proposed development achieves this intent notwithstanding the reduced percentage of façade within the required setback area. The overall built form remains urban in character and appropriately frames the corner condition at Westhill Drive and Ira Needles Boulevard while responding sensitively to the irregular parcel geometry.

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 3.9.1 of the City of Waterloo's Official Plan sets out 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. More specifically, Section 3.9.3 of the Official Plan provides the General Urban Design Policies, which are intended to support the design objectives established in Section 3.9.1 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 3.9.3 of the Official Plan in relation to the proposed development:

Section 3.9.3	**Assessment**
Public Realm and Streetscapes	
1) Development in the City of Waterloo shall consider and align with the following urban design directions with regards to streetscapes and placemaking: (a) Streetscapes include the public street, the setbacks, and the building edges, which work together to create the pedestrian environment. Visually interesting streetscapes that imbue a sense of place should be created through variation in building typology, massing, architectural detailing and materiality	The proposed development contributes to a visually interesting streetscape through a contemporary mid-rise built form along both Westhill Drive and Ira Needles Boulevard.
(b) Streets will be designed to promote active transportation and connection to transit stations, including walking, and cycling, and rolling.	The proposed development supports active transportation through direct pedestrian connections to existing sidewalks, proximity to cycling infrastructure, and convenient access to multiple Grand River Transit routes, including Route 13, 29, and 202 iXpress. The compact built form and reduced parking ratio further encourage walking, cycling, and transit use.

(c) Streets and blocks should be designed to create a finely-scaled and interconnected network that promotes integration between existing and planned communities. New streets shall connect with existing streets wherever possible to achieve an interconnected network of streets.	The subject property is located within an existing and interconnected urban street network with direct frontage onto Westhill Drive and Ira Needles Boulevard. The development integrates into the surrounding community by utilizing and reinforcing the existing transportation network and pedestrian connections.
(d) Development is encouraged to contribute to a continuous street wall along its street frontage and will contribute to a human scale streetscape.	The proposed building has been positioned to frame both street frontages and contribute to a defined street edge and human-scaled streetscape. The development introduces a compact urban form that is appropriate for a Minor Node and supports the evolving character of the surrounding area.
(e) The City will promote an attractive and coordinated approach to streetscape design with emphasis given to green and complete streets; pedestrian, cyclist and rolling friendly design; and coordinated landscape and building design elements that animate the street in the public and private realm, through a cohesive visual identity.	The proposed development incorporates coordinated landscape and built form elements that support an attractive and pedestrian-oriented public realm. The proposal supports complete street objectives through enhanced walkability, landscaped areas, and proximity to transit and active transportation infrastructure.
(f) Development is encouraged to integrate small-scale publicly-accessible open spaces where possible, in the form of mid-block connections, sliver parks, forecourts, courtyards, mews and other micro spaces, in order to enhance pedestrian experience and movement.	The proposed development incorporates outdoor amenity space fronting Westhill Drive, contributing to the pedestrian experience and providing accessible outdoor space for residents. Additional opportunities for landscaped gathering areas and pedestrian-oriented design elements will be refined through the Site Plan Approval process.
(g) Along primary streets and where active uses are located on the ground floor, building design is encouraged to feature frequent entrances, high transparency, well-articulated facades, and a rhythm of pedestrian-scaled architectural bays or modules along the street that provide variety and visual interest.	The proposed development includes primary building entrances along both Westhill Drive and Ira Needles Boulevard to support pedestrian accessibility and animation along the street frontage. Building articulation, glazing, and architectural detailing will contribute to a pedestrian-scaled streetscape and visual interest.

(h) Street trees contribute to urban infrastructure as they help reduce urban heat island effects, mitigate wind impacts, improve stormwater management function, support urban habitat and biodiversity, and contribute to improved human health and well-being. In addition, street trees beautify the urban environment and contribute to the attractiveness of the public and private realms. Trees are strongly encouraged on both sides of all streets (within the road allowance, and within front and flankage yards) wherever feasible, such that they form a continuous canopy at maturity.	Landscaping and street tree opportunities will be further refined through the Site Plan Approval process. The proposal contemplates landscaped open space areas that will contribute to the urban canopy, improve the public realm, and support broader environmental and urban design objectives.
(i) Parking areas and structures will be located and designed to limit their visual impact on the public realm. Where feasible, underground parking is encouraged for intensification projects, particularly residential or mixed use development. Surface parking in planned intensification areas is generally discouraged.	Parking has been consolidated within a combination of structured and surface parking areas to minimize visual impacts on the public realm and support an efficient site layout. The structured parking takes advantage of the site topography to reduce its visibility from adjacent streets.
(j) Where above-grade parking structures are proposed, they are strongly encouraged to be wrapped by permitted active uses fronting the street, with additional measures taken to screen any parking which is visible from public view through the use of landscaping or other design strategies. On primary streets, above-grade parking structures are strongly discouraged; where they exist, they should be wrapped by active uses such as residential units, retail, commercial or institutional uses on all podium levels. On secondary streets, above-grade parking structures shall be required to be wrapped by active uses at-grade and are	The proposed structured parking area is integrated into the building design and partially embedded within the site due to existing grade conditions, reducing its visibility from the public realm. Additional screening and architectural integration measures, including landscaping and façade treatments, will be refined through the Site Plan Approval process.

encouraged to include active uses above the ground floor.	
Built Form and Building Typologies	
2) Well-designed and sculpted buildings help contribute to a high standard of design, enhancing neighbourhood identity and improving the broader pedestrian environment. The built form of new development should contribute to an overall safe, accessible, and visually interesting environment. Development in the city will consider and align with the following key built-form design directions: (a) New development including infill should be located and organized to fit harmoniously within the existing and planned context to support streets, lanes, parks and open spaces, enabling the creation of a vibrant and safe public realm. The following policies apply: i. Buildings should be sited, and oriented to frame adjacent streets and public spaces with good street proportion, helping to create a high-quality pedestrian realm.	The proposed building is oriented toward both Westhill Drive and Ira Needles Boulevard to frame the adjacent streets and reinforce the public realm. The development contributes to a defined street edge and supports a comfortable pedestrian environment through its compact built form and relationship to the surrounding streetscape.
ii. Buildings will be designed with prominent building entrances to face primary streets or areas of high pedestrian movement. Access from sidewalks, other pedestrian facilities and public open spaces to primary building entrances shall be clearly visible, convenient and direct, with minimum changes in grade, and will be accessible and barrier-free.	The proposed development includes prominent and accessible building entrances along both Westhill Drive and Ira Needles Boulevard, providing direct and visible pedestrian access from the public sidewalk. The entrances are intended to be barrier-free and will support convenient pedestrian circulation and accessibility.
iii. Infill development should be compatible with existing and planned context and character. Compatibility is to	The proposed infill development is compatible with the existing and planned context of the surrounding area, which includes a mix of mid-rise residential buildings and approved

	be demonstrated, with regard for the characteristics that define the streetscape	intensification projects. The proposed scale, height, and massing align with the planned function of the Minor Node and contribute positively to the evolving streetscape character.
	iv. On a corner site, the development should address both street frontages and give prominence to the corner.	As a corner site, the proposed development has been designed to address both Westhill Drive and Ira Needles Boulevard through active façades, building articulation, and entrances oriented toward both street frontages. During the Site Plan Approval stage, the corner condition is emphasized through the building massing and architectural presence at the intersection.
(b)	New development including infill shall provide appropriate built form transitions between areas of different heights and/or intensity of uses. The following policies apply: i. Transition in scale is to be appropriately implemented at the site, block and neighbourhood level.	The proposed 6-storey building provides an appropriate transition in scale within the surrounding context, which includes existing and approved mid-rise and high-rise residential developments along Westhill Drive and Ira Needles Boulevard. The development represents an appropriate form of intensification within a designated Minor Node.
	ii. Development should incorporate measures that foster built form transition, which may include but are not limited to, stepbacks to upper levels, vertical and horizontal recesses and projections, façade articulation, architectural detailing and changes in plane, materiality, texture and colour to break visual impact.	During the Site Plan Approval stage, the proposed development will aim to incorporate building articulation, changes in plane, and architectural detailing to reduce perceived massing and create visual interest along the façades. Additional refinements related to materiality, recesses, projections, and façade treatments will be finalized through the Site Plan Approval process.
	iii. Shadowing onto public realm, parks and open spaces is strongly discouraged. In general, shadows should be mitigated to the extent possible.	The proposed building has been designed to minimize adverse shadow impacts on the surrounding public realm and adjacent properties to the extent feasible. Given the site context and surrounding built form, the proposed development is not anticipated to create significant shadow impacts on nearby parks or publicly accessible open spaces.

Based on the table above, it is our opinion that the proposed development aligns with the General Urban Design Policies of Section 3.9.3 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. 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	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.

	analysis, articulated massing techniques and context.	
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 (Revised)

A Functional Servicing and Stormwater Management Report (FSR/SWM Report) was originally prepared by WalterFedy on April 8, 2025, and was revised on April 29, 2026, for this resubmission package. It should be noted that the contents of the Report were not updated, but rather the supporting plans were revised in order to address City / Regional comments. The findings of the Report remain the same and are summarized below.

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 (Revised)

An Environmental Noise Study was originally prepared by JPE Engineering on March 17, 2025, and was revised on May 12, 2026, for this this resubmission package. The purpose of the study was to assess potential transportation and stationary noise impacts associated with the proposed six-storey, 56-unit apartment building at 41 Westhill Drive and to identify mitigation measures required to achieve compliance with applicable Ministry of the Environment, Conservation and Parks (“MECP”) guidelines and City of Waterloo requirements.

The study evaluated road traffic noise from Ira Needles Boulevard and Erb Street West through traffic forecasting, computer modelling, and STAMSON analysis. The results confirmed that traffic noise from Ira Needles Boulevard represents the dominant transportation noise source affecting the site, with certain façades and outdoor amenity areas exceeding applicable MECP sound level criteria during both daytime and nighttime periods.

In response, JPE Engineering recommended a range of mitigation measures, including the implementation of warning clauses in accordance with NPC-300, upgraded building components such as enhanced wall and window assemblies, and the provision of central air conditioning and mechanical ventilation systems to allow residents to maintain acceptable indoor sound levels with windows closed where required.

The revised study also includes an assessment of stationary noise sources associated with the proposed development, including HVAC equipment, chillers, and loading-related activity. The stationary noise assessment concluded that, with appropriate design and mitigation measures incorporated into the final mechanical design, the proposed development can satisfy applicable MECP stationary noise criteria at nearby sensitive receptors.

Overall, the Environmental Noise Study concludes that the proposed development is feasible from an acoustical perspective and can achieve compliance with applicable MECP and City of

Waterloo noise requirements, subject to the implementation of the recommended mitigation measures.

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 public consultation undertaken to date and the ongoing consultation strategy associated with 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.

Since the submission of the application in December 2025, consultation with the public has occurred through both formal and informal engagement opportunities. An informal public meeting was held before City Council on February 9, 2026, where the applicant team presented the proposed development and supporting materials. The meeting provided members of Council and the public with an opportunity to review the proposal and provide feedback.

Comments received through this process generally related to matters including traffic and transportation impacts, the proposed affordable housing component, density, and landscaping and site design considerations. These comments have been considered by the applicant team as part of the ongoing review and refinement of the proposal and supporting materials submitted through this resubmission.

In addition, on April 15, 2026, the Region hosted a public open house at the KW Bilingual School located near the subject lands. The open house provided members of the public with an opportunity to review display boards and materials outlining the proposed development, associated transportation considerations, and the overall planning process. Representatives from the Region and the consultant team were available to answer questions and receive feedback from attendees.

As part of the ongoing consultation process, the Region has also advised that it is continuing to investigate opportunities to meet directly with the adjacent retirement community to further discuss the proposal and address questions or concerns related to the development.

Overall, the consultation strategy is intended to provide meaningful opportunities for the public and stakeholders to review the proposal, understand the supporting rationale and technical analysis, and provide feedback throughout the planning process. Additional consultation opportunities may continue to be considered in coordination with City and Regional Staff as the approvals progress.

11. CONCLUSION

This Report provides an assessment of the revised development proposal and Zoning By-law Amendment Application for the property known municipally as 41 Westhill Drive, which includes a discussion of the existing conditions of the site, its context, the land use planning policy framework applicable to it, land use planning rationale for the development proposed, and review of the applicable urban design guidelines.

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

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

Based on the above and the conclusions of this Report, it is our recommendation that the City of Waterloo continue to process the development applications and re-circulate the updated materials to internal departments, technical review agencies, and the public 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-2026

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
      - Streetline Setback (Maximum): At least 25% of Streetline Front Building Façade within 7.5 metres of the Streetline
      - 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 _____, 2026.

READ a third time and finally passed this _____ day of _____, 2026.