



July 31, 2025

Natalie Hardacre, MCIP, RPP
 Manager of Development Approvals
 City of Waterloo
 100 Regina Street South
 Waterloo, ON N2J 4P9

Dear Ms. Hardacre:

**RE: Application to Lift Holding Provisions
 14, 16, 18 and 20 Lodge Street and 195, 201, 205 and 209 Regina Street North,
 Waterloo
 OUR FILE 1819D**

On behalf of Wilfrid Laurier University ("Laurier"), we are pleased to submit the enclosed application to Lift the Holding Provision for the above-noted lands (herein referred to collectively to as the "subject lands"). Laurier prefers to proceed with lifting the Holding provisions applicable to the subject lands despite current exemptions afforded to post-secondary institutions under the *Planning Act*. As such, Laurier submits this application on a **without prejudice basis**. The lands subject to the requested Holding Removal as noted above are illustrated in **Figure 1** on the following page. We note that 12 Lodge Street is not included in the application.

The subject lands, together with 12 Lodge Street and 192 and 200 King Street North form the "King/Regina/Lodge Block" owned by Laurier.

Official Plan

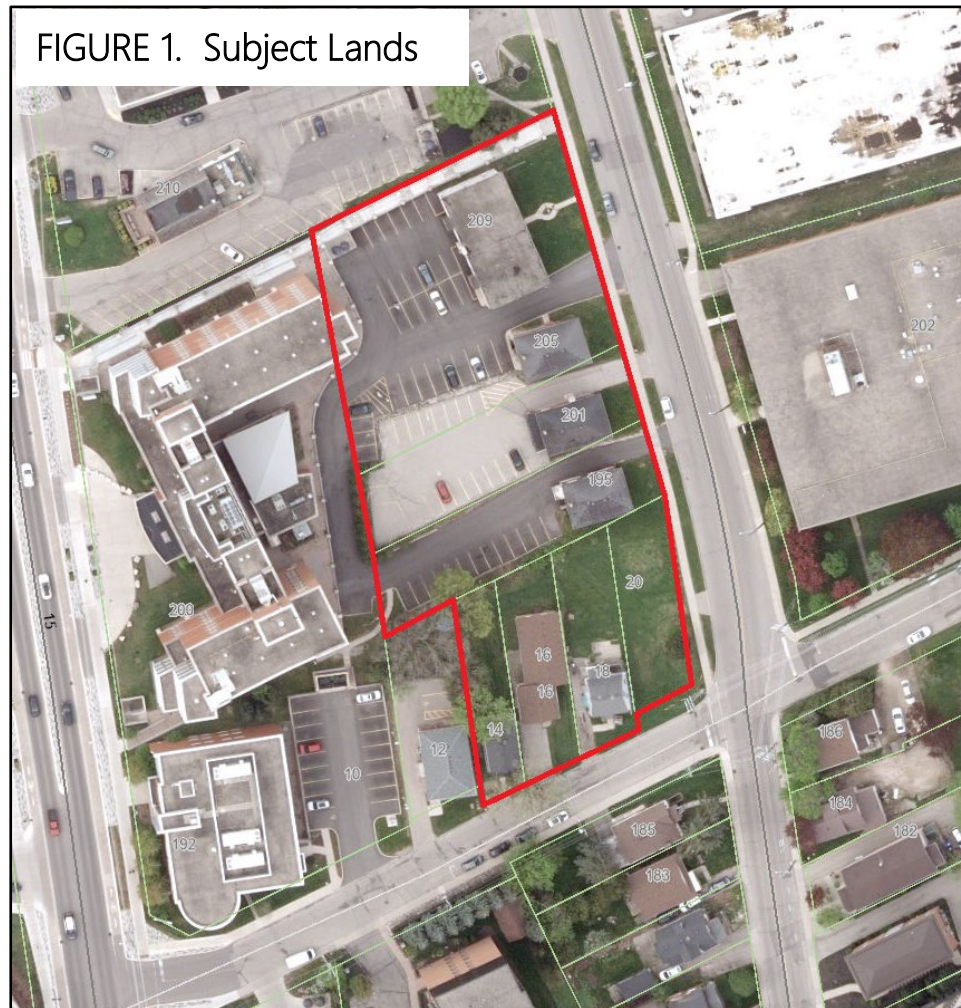
The subject lands are located directly east of the main campus and are designated as follows in the City of Waterloo Official Plan:

- *Mixed-Use High Density Residential* on Schedule A: Land Use
- *Specific Provision Area (SPA) 20A and 20G* on Schedule A6a: Specific Provision Areas 20 and 45
- *Major Node* on Schedule B: City Structure
- *High Density, 81 metres* on Schedule B1: Height and Density

Council-Adopted Official Plan Amendment 58 (OPA 58) designates the subject lands *Major Institutional – Academic* on Schedule A: Land Use recognizing that they form a part of the Laurier

campus. Remaining designations of the subject lands as listed above were not changed through OPA 58.

Generally, the policy framework of SPA 20A requires the completion of a Record of Site Condition (RSC) acknowledged by the Ministry of Environment prior to the use of lands for academic purposes.



Zoning By-law 2018-050

The subject lands are zoned *University College* with a holding provision ([H]UC-81) as illustrated in **Figure 2**. The following exceptions also apply to all or part of the subject lands:

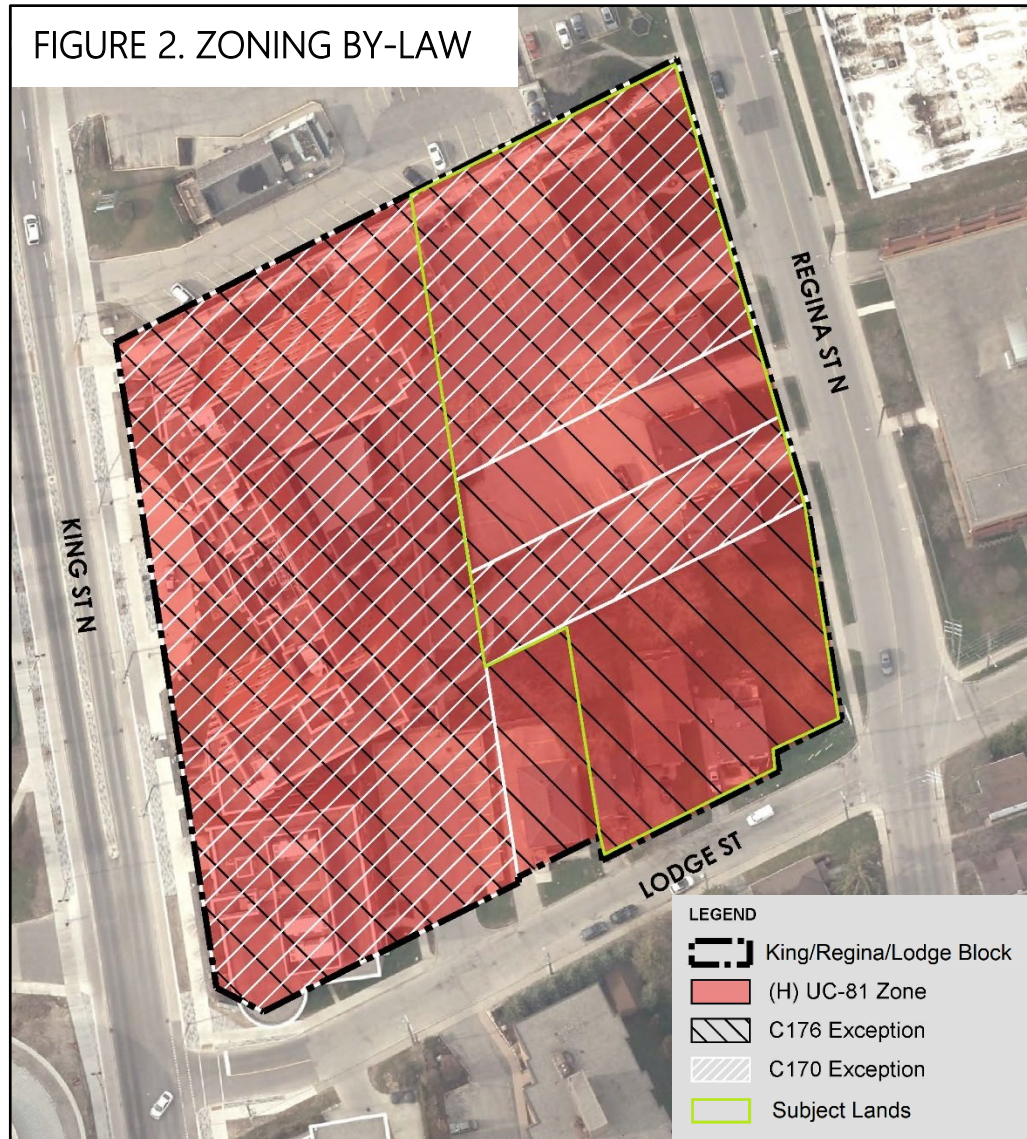
- C170: 195 and 205-209 Regina Street North
- C176: all properties comprising the subject lands

The regulations of Exception C170 set out, in part, the requirements to lift the Holding provision from 195 and 205-209 Regina Street North. Specifically, Site Specific Regulation c) v. states the following:

"That a holding (H) symbol shall be applied to the lands. Notwithstanding anything to the contrary, no PERSON shall erect, alter, enlarge, reconstruct, or use a BUILDING or STRUCTURE in whole or in part on the lands for any purpose until such time as the holding (H) symbol is

removed, with the exception of an *EXISTING USE*. Prior to the passing of a *BY-LAW* to remove the holding (H) symbol, the owner of the lands shall:

- A. Verification of sufficient servicing capacity (water, sanitary, and stormwater) to full service the lands; and
- B. For known or suspected contaminated site as identified by the *REGION*, verification from the *REGION* and or the Province of Ontario that the owner has completed a *Record of Site Condition*."



Exception C176 implements the policy framework of SPA 20G. Site Specific Regulation c) iii. states the following with respect to the removal of the Holding provision from the lands within SPA 20G:

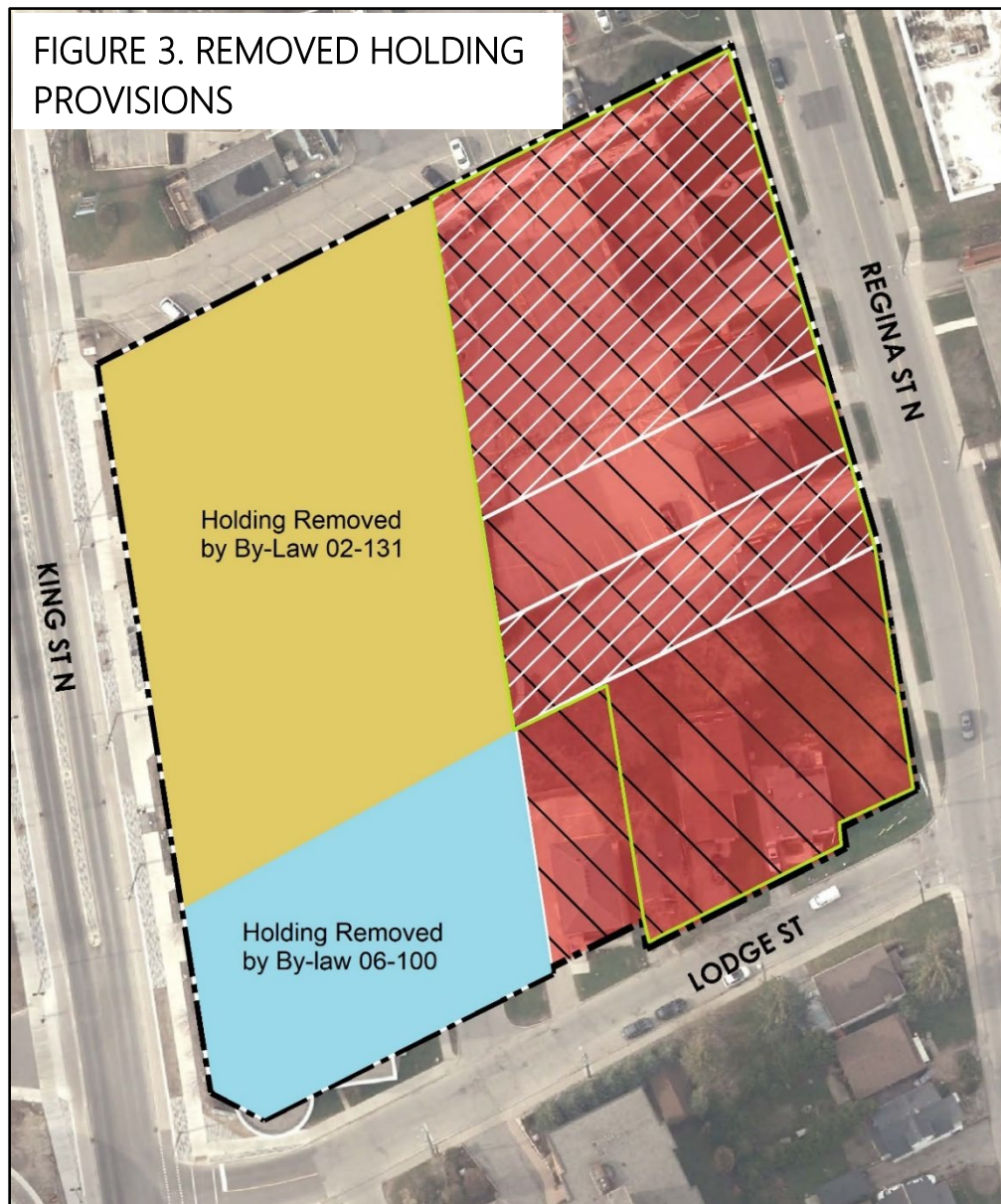
"That a holding (H) symbol shall be applied to the lands and that no PERSON shall use in whole or in part any lands for a University or College USE until such time as the holding (H) symbol is removed. Prior to the passing of a BY-LAW to remove the holding (H) symbol, the owner of the lands shall provide to the CITY verification from the REGION and or the Province of Ontario that the owner has completed a Record of Site Condition and with respect to the Holding

provision, requires the Ministerial Acknowledgement of a Record of Site Condition to remove the Hold."

It is noted that the requirements to remove the Holding provision as per C170 were satisfied prior to construction of the King Street Residence (200 King Street North) and Career Centre (192 King Street North), with the City of Waterloo previously passing the following By-laws to lift the Holding provisions:

- By-law No. 02-131 (200 King Street North)
- By-law No. 06-100 (192 King Street North [collectively])

By way of these two By-laws, the Holding provisions were lifted for half of the block as illustrated in **Figure 3**. These Holding provisions were inadvertently re-applied to 192 and 200 King Street North through the drafting and approval of the new Comprehensive Zoning By-law in 2018. This error was recently corrected through a city-initiated Zoning By-law Amendment (By-law 2024-039) approved by Waterloo City Council in April 2024.



Application to Lift the Holding Provision

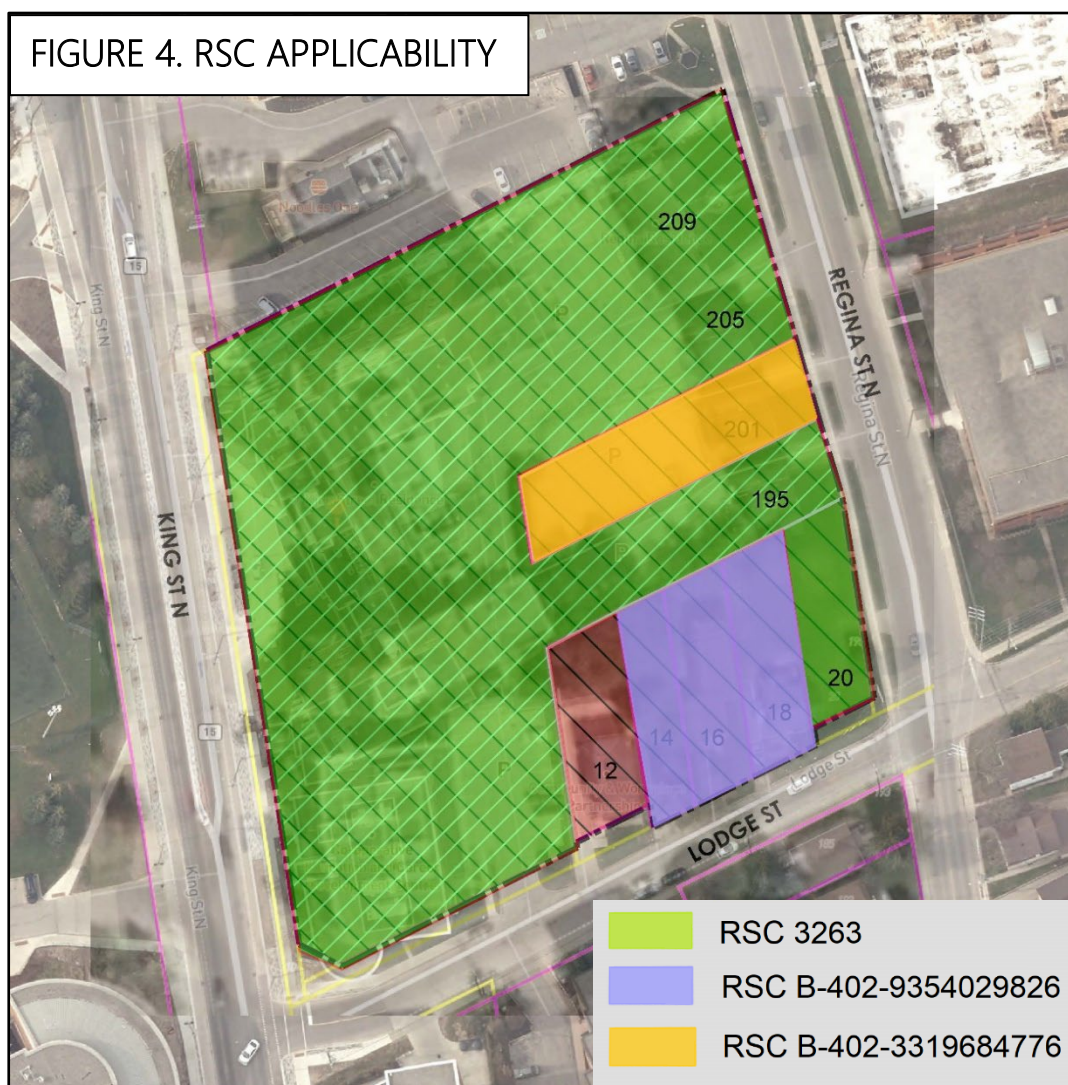
The enclosed application requests that the Holding provision be lifted from the balance of the lands owned by Laurier within the King/Regina/Lodge Block, except for 12 Lodge Street. RSCs have been filed and acknowledged by the Ministry of Environment for all properties within the Block, except for 12 Lodge Street. A Servicing Capacity Assessment has also been completed by MTE Consultants Inc. and is discussed below.

Records of Site Condition

The following RSCs are enclosed with this submission to support the lifting of the Holding provision:

1. RSC # B-402-9354029826: applies to 14, 16, 18 Lodge Street
2. RSC # B-402-3319684776: applies to 201 Regina Street North
3. RSC# 3263: applies to 192-208 King Street North, 10 and 20 Lodge Street, and 195, 205 and 209 Regina Street

The applicability of the RSCs as described above is illustrated in **Figure 4**.



Servicing Capacity Assessment

The enclosed Servicing Capacity Report prepared by WalterFedy in June 2024 considers the conceptual redevelopment of the balance of the subject lands (being the Regina Street North and Lodge Street frontages) for a new student residence and academic building to the maximum height and density permissions afforded to the lands for the purposes of the analysis. For a potential maximum build out of the subject lands, the Report concludes that both the municipal water and sanitary networks are sufficient to accommodate a new building and that stormwater management quantity controls will be required to limit peak discharges.

The Servicing Capacity Report was circulated to City staff for review and comment prior to the submission of this application. Upon review, staff further advised they had no comments or concerns. Correspondence to this effect is enclosed as **Appendix A** herein.

Fulfilling Requirements to Lift the Hold

The requirements to lift the Holding provision as per C170 for 195, 205 and 209 Regina Street North are fulfilled through the completion of the enclosed Servicing Capacity Report and the previous filing and Acknowledgement of RSC 3263.

Requirements to remove the Holding provision as per C176 for 14, 16, 18 and 20 Lodge Street and 201 Regina Street North are fulfilled through the filing and acknowledgement of RSCs B-402-9354029826 and B-402-3319684776 and previous filing and acknowledgement of RSC 3263.

Upon approval of this application, the only property within the King/Regina/Lodge Block that remains subject to a Holding provision would be 12 Lodge Street (specifically C176) and the Holding provision requirements of C170 will be completely satisfied and no longer applicable. In this regard 14 to 20 Lodge Street and 195 to 209 Regina Street North will be zoned UC-81.

Not necessarily true, C170 requires servicing and RSC and the RSC component is still needed for 12 Lodge.

Closing

To support the Lifting of Holding Provision application, please find enclosed the following:

- Ministerial Acknowledgement of RSC # B-402-9354029826
- Ministerial Acknowledgement of RSC # B-402-3319684776
- Transition Notice of RSC # 3263; and
- Servicing Capacity Report – Servicing Capacity Check for King/Regina/Lodge Residential Block, dated June 24, 2024

The required application fee of \$13,455.00 will be forwarded to you under separate cover by Laurier. We trust the enclosed is sufficient to process the application. Should you require additional information, please do not hesitate to contact the undersigned.

Yours truly,

MHBC



Trevor Hawkins, M.PL, MCIP, RPP
Partner



Meghan Lippert, MAES
Planner

cc. *Rob Anderson, Wilfrid Laurier University*
Ulrike Gross, Wilfrid Laurier University

APPENDIX A

Staff Correspondence – Servicing Capacity Report

Meghan Lippert

From: Rob Anderson <randerson@wlu.ca>
Sent: October 7, 2024 10:02 AM
To: Meghan Lippert
Subject: FW: [EXTERNAL *] FW: WLU - Regina/Lodge/King - Holding Provisions

Follow Up Flag: Follow up
Flag Status: Flagged

FYI



Rob Anderson, (He/Him)

Associate Director Real Estate & Land Use Planning
Facilities and Asset Management

Office 548.889.3713

75 University Avenue, West, Waterloo, Ontario, N2L3C5

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From: Darren Scott <Darren.Scott@waterloo.ca>
Sent: Monday, October 7, 2024 9:35 AM
To: Rob Anderson <randerson@wlu.ca>
Cc: Francis Reyes <Francis.Reyes@waterloo.ca>; Joel Cotter <Joel.Cotter@waterloo.ca>
Subject: RE: [EXTERNAL *] FW: WLU - Regina/Lodge/King - Holding Provisions

Hi Rob,

We've reviewed the FSR and there are no concerns moving forward.

Thanks,



Darren Scott, P.Eng.

Manager, Development Engineering
Engineering Services, Integrated Planning & Public Works
100 Regina St. S.
PO Box 337, Station Waterloo
Waterloo ON N2J 4A8

P: 519-747-8545 **TTY:** 1-866-786-3941

E: darren.scott@waterloo.ca | www.waterloo.ca



From: Rob Anderson <randerson@wlu.ca>
Sent: September 29, 2024 5:12 PM
To: Darren Scott <Darren.Scott@waterloo.ca>

Cc: Francis Reyes <Francis.Reyes@waterloo.ca>; Joel Cotter <Joel.Cotter@waterloo.ca>
Subject: [EXTERNAL] RE: [EXTERNAL *] FW: WLU - Regina/Lodge/King - Holding Provisions

Hi Darren,

Further to Joel's email a few months back, does your team have any preliminary comments on the previously attached Functional Servicing Report for the WLU Regina, Lodge, King property?

Thanks,

-Rob



Rob Anderson, (He/Him)
Associate Director Real Estate & Land Use Planning
Facilities and Asset Management
Office 548.889.3713
75 University Avenue, West, Waterloo, Ontario, N2L3C5
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From: Joel Cotter <Joel.Cotter@waterloo.ca>
Sent: Tuesday, June 25, 2024 10:48 PM
To: Rob Anderson <randerson@wlu.ca>
Cc: Francis Reyes <Francis.Reyes@waterloo.ca>; Darren Scott <Darren.Scott@waterloo.ca>; Joel Cotter <Joel.Cotter@waterloo.ca>
Subject: [EXTERNAL *] FW: WLU - Regina/Lodge/King - Holding Provisions

Hi Rob,

Pursuant to Bill 185, effective June 6th, undertakings of a post-secondary institution are no longer subject to the Planning Act. As such, the holding provision is moot. That said, Laurier remains subject to other applicable law, including the Building Code Act and Ontario Regulation 153/04. MOECP will need to determine the applicability of O. Reg 153/04 in this instance (re: Record of Site Condition); regardless, it is strongly recommended that Laurier complete an RSC, given the original concerns that warranted the holding provision regarding same.

Prior to the issuance of a building permit, servicing availability and capacity will need to be verified, to the satisfaction of the City of Waterloo. Darren Scott, Manager of Development Engineering, is copied – his team can commence a review of the attached report.

Let me know if you have any questions.

Regards,

Joel

JOEL COTTER MCIP RPP

Sr. Director of IPPW, Director of Planning, City Planner
City of Waterloo

(519) 747-8543 • joel.cotter@waterloo.ca

Vacation Alert: June 28 to July 3, returning July 4

From: Rob Anderson <randerson@wlu.ca>
Sent: Tuesday, June 25, 2024 4:25 PM
To: Joel Cotter <Joel.Cotter@waterloo.ca>
Subject: [EXTERNAL] WLU - Regina/Lodge/King - Holding Provisions

Hi Joel,

We're nearing completion of the work required to lift the environmental and servicing holds over the future Regina St residence lands.

Our RSC has been submitted to the Ministry and is currently under review. I'm optimistic that we should have the comments resolved by the end of August and a request to lift the environmental hold into the City shortly thereafter.

With regards to the servicing hold, WalterFedy has prepared a Functional Servicing Report (attached). Is it possible for the City to complete a cursory review of the report and advise on any concerns?

I would like to have both the environmental and servicing holds lifted from the property by the fall, so I'm trying to get as many ducks lined up as I can.

Let me know if there is anything you can do to get the ball rolling or if there is a specific process I'll need to follow to get this in the queue.

Thanks Joel and have a good afternoon,

-Rob



Rob Anderson, (He/Him)
Associate Director Real Estate & Land Use Planning
Facilities and Asset Management
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