



## Labreche Patterson & Associates Inc.

Professional Planners, Development Consultants, Project Managers

Delivered via Email and Hand Delivered

**Our File: P-1033-17**

September 13, 2018

Ms. Wendy Fisher, MA, MCIP, RPP  
Development Planner, Planning Approvals  
Integrated Planning and Public Works  
City of Waterloo  
100 Regina Street South  
Waterloo, Ontario  
N2J 4A8

Dear Ms. Fisher:

**Re: 508 Beechwood Drive  
Zoning By-law Amendment Application  
Resubmission of Materials and Supplemental Letter  
508 Beechwood Inc.**

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On March 19, 2018, Labreche Patterson & Associates Inc. submitted a Zoning By-law Amendment application on behalf of 508 Beechwood Inc. for the lands municipally known as 508 Beechwood Drive in the City of Waterloo. Since the initial submission, an Informal Public Meeting was held on June 11, 2018, where comments from Councillors and members of the public were received. Since the June 11, 2018 Informal Public Meeting, the City of Waterloo has not contacted our office to further discuss the application or its processing. Based on the comments received that evening, the consultant team and landowner have considered various options and the proposed development for 508 Beechwood Drive has been revised and refined. This letter is intended to provide an overview of the revised design and outline the proposed modifications to the Zoning By-law Amendment. This letter is also intended to provide general supplemental information in addition to the Planning Opinion Report dated March 19, 2018 and prepared by Labreche Patterson & Associates Inc.

Unless noted otherwise in this letter, the information and analysis contained within the Planning Opinion Report dated March 19, 2018 remains applicable to the revised proposed Zoning By-law Amendment application.

### **Proposed Development**

The Owner has modified the project and is now proposing to construct a new 12-storey multiple unit residential building on the subject property that will be physically connected to the existing 7-storey multiple unit residential building along the west side of the existing building. The proposed building will include a 4-storey podium addressing the frontage, interior side and rear

of the property, and connecting to the existing apartment building. The proposed building will also include an 8-storey tower to be located at the southwest corner of the podium.

The new building is proposed to include 132 units, consisting of 4 one-bedroom plus den units, 40 one-bedroom units, 6 two-bedroom plus den units, and 82 two-bedroom units, for a total of 220 bedrooms. To facilitate the connection of the existing building to the new building, the existing building must be slightly modified and will consist of 63 bedrooms, instead of the 70 bedrooms currently existing; however the number of units, being 41, will remain the same. Therefore, the proposed development will consist of a density of 235 units per hectare and 384 bedrooms per hectare. Table 1 summarizes the change between the proposed development as of March 2018 and the proposed development enclosed with this resubmission package with respect to the applicable Zoning By-law regulations, dated September of 2018.

Table 1: Summary of Zoning By-law Regulations, Previous Proposal and Current Proposal

<b>Regulation</b>	<b>Requirement</b>	<b>March 2018 Version</b>	<b>September 2018 Version</b>	<b>March to September Change</b>
Lot Area (min) <sup>2</sup>	0.5 hectares	0.737 hectares	0.737 hectares	Same
Lot Frontage (min) <sup>2</sup>	60 metres	81.2 metres	81.2 metres	Same
Front Yard Setback (min) <sup>3</sup>	7.5 metres	3.73 metres	7 metres	Increase
Side Yard Setback (min) <sup>3</sup>	½ height of building, no less than 3.0 metres	3.05 metres (2.74 from Dedication)	7.5 metres	Increase
Rear Yard Setback (min) <sup>3</sup>	½ height of building, no less than 7.5 metres	10.51 metres	17.5 metres	Increase
Low Rise Residential Setback (min) <sup>1</sup>	N/A	N/A	N/A	N/A
Landscape Buffer adjacent to Low Rise Residential Area <sup>1</sup>	N/A	N/A	N/A	N/A
Landscaped Area (min) <sup>3</sup>	30% of lot area	18.87%	>30%	Increase
Amenity Area (min) <sup>3</sup>	9050 square metres (50 square metres per unit)	825 square metres	2881 square metres	Increase
Driveway Width (min) <sup>1</sup>	6.1 metres	6.1 metres	6.1 metres	Same
Building Entrance <sup>1</sup>	Front entrance shall face the street	Yes	Yes	Same
Building Height, Overall Site (max) <sup>2</sup>	380 metres above sea level	404.2 metres above sea level (39.8 metres)	401.9 metres above sea level (37.5 metres)	Decrease
Building Height, Vacant Parcel (max) <sup>4</sup>	6 storeys	12 storeys	12 storeys	Same
Density, Vacant Parcel (max) <sup>4</sup>	101 units per hectare	245 units/hectare	235 units/hectare	Decrease
Density, Parcel with Existing Building (max) <sup>4</sup>	32 units per hectare	245 units/hectare	235 units/hectare	Decrease

Regulation	Requirement	March 2018 Version	September 2018 Version	March to September Change
Parking (min) <sup>2</sup>	1.5 spaces per unit	1.34 spaces per unit (243 spaces)	1.3 spaces per unit (225 spaces)	Decrease
Surface Parking Spaces (min) <sup>1</sup>	10% of required parking	18.5% of required parking, based on 243 spaces (45 spaces)	12% of required parking, based on 225 spaces (27 spaces)	Decrease
Parking Structure Regulations <sup>1</sup>	25% of ground floor must be habitable, located at front of building along entire length of building frontage	100%	100%	Same

## Notes:

\* Calculations based on the consolidation of the two parcels post-dedication

<sup>1</sup> City of Waterloo Zoning By-law No. 1418, MR-12

<sup>2</sup> By-law 81-088

<sup>3</sup> By-law 05-067

<sup>4</sup> Minor Variance A-67/02

As noted in the Planning Opinion Report, the original proposal was designed with regard for the Comprehensive Zoning By-law Review “Residential Mixed-Use Zone (RMU-40)” based on the identification within the first and second drafts of the Comprehensive Zoning By-law that the subject property was proposed to be zoned RMU-40. As per the August 8, 2018 version and September 10, 2018 version of the Comprehensive Zoning By-law, the subject property is proposed to be zoned “Zone Change Zone (ZC)” to recognize that the property is currently subject to a Zoning By-law Amendment application. Table 2 summarizes the change between the proposed development as of March 2018 and the proposed development enclosed with this resubmission package with respect to the RMU-40 Zone regulations of the Comprehensive Zoning By-law, as approved by Council on September 10, 2018. As demonstrated in Table 2, the revised proposed development complies with all of the RMU-40 regulations proposed as part of the September 10, 2018, approved version of the Comprehensive Zoning By-law.

Table 2: Summary of Previous and Current Proposals’ Compliance with RMU-40 Regulations

Regulation	Requirement	March 2018 Version	March Compliance	September 2018 Version	September Compliance
Lot Frontage (min)	20 metres	81.2 metres	Yes	81.2 metres	Yes
Street Line Setback (min)	5 metres	3.73 metres	No	7 metres	Yes
Street Line Setback (max)	75% of the Front Building Façade within 7.0 metres of Street Line	100% is within 7 metres	Yes	100% is within 7 metres	Yes
Side Yard Setback (min)	3 metres	3 metres (2.74 metres after Dedication)	No	7.74 metres (7.5 metres after Dedication)	Yes
Rear Yard Setback (min)	7.5 metres	10.5 metres	Yes	17.5 metres	Yes
Low Rise Residential Lot	7.5 metres or half the height of the	N/A	N/A	N/A	N/A

Regulation	Requirement	March 2018 Version	March Compliance	September 2018 Version	September Compliance
Line Setback (min)	Building, whichever is greater				
Building Height (min)	10.5 metres	39.8 metres	Yes	37.5 metres	Yes
Building Height (max)	40 metres and 12 storeys	39.8 metres, 12 storeys	Yes	37.5 metres, 12 storeys	Yes
Density (min)	150 bedrooms per hectare	417 bedrooms per hectare	Yes	384 bedrooms per hectare	Yes
Density (max)	600 bedrooms per hectare	417 bedrooms per hectare	Yes	384 bedrooms per hectare	Yes
Landscaped Open Space (min)	30%	18.87%	No	>30%	Yes
Number of Main Buildings Per Lot (max)	More than one (1) permitted	2 buildings	Yes	1 building	Yes
Height of First Storey (min)	4.5 metres	4.5 metres	Yes	4.5 metres	Yes
Podium Height (min)	10.5 metres	4.5 metres	No	13.5 metres	Yes
Podium Height (max)	14.8 metres and 4 storeys	4.5 metres	Yes	13.5 metres, 4 storeys	Yes
Tower Separation (min)	22 metres from a tower on the same lot, 11 metres from an interior lot line (unless lands zoned OS1)	N/A (lands zoned OS1)	N/A	N/A	N/A
Horizontal Tower Dimension (max)	40 metres	66 metres	No	34.5 metres	Yes
Tower Footprint (max)	1,000 square metres	1,784 square metres	No	906 square metres	Yes
Tower Stepback Above Podium (min)	3 metres	4 metres	Yes	3 metres	Yes
Amenity Area (min)	3 square metres for the first bedroom and 2 square metres for each additional bedroom in the dwelling unit	2.6 square metres per bedroom	No	10.2 square metres per bedroom (2,881 square metres)	Yes
Parking Spaces, Residential (min)	1.10 per dwelling unit	1.24 per dwelling unit (225 spaces)	Yes	1.20 per dwelling unit (208 spaces)	Yes
Parking Spaces, Visitor (min)	0.10 per dwelling unit	0.10 per dwelling unit (18 spaces)	Yes	0.10 per dwelling unit (17 spaces)	Yes

Additionally, it is our understanding that as part of the Comprehensive Zoning By-law Review process, a review was undertaken of all Site Specific provisions under the former By-law. In conclusion to that review, Site Specific provisions identified as necessary were carried forward under the Comprehensive Zoning By-law and all other Site Specific provisions will be repealed and no longer apply. In this regard, as per the September 10, 2018 approved version of the Comprehensive Zoning By-law, Site Specific By-laws 05-067 and 81-088, which currently apply to the subject property, are not carried forward and upon enactment of the Comprehensive Zoning By-law, will not be applicable to the subject property or the proposed application.

When the proposed development is considered with regards to the removal of the application of Site Specific By-laws 05-067 and 81-088, the number and magnitude of Site Specific provisions to facilitate the proposed development significantly decreases. For instance, Site Specific provisions are no longer required for a reduced front yard setback, reduced side yard setback, reduced rear yard setback, or reduced amenity area. Further, the Site Specific provisions required for building height and parking are aligned more comparably with the "MR-12" Zone regulations that would apply. In this regard, based on the review of staff and the direction of the Comprehensive Zoning By-law with respect to the currently applicable Site Specific By-laws as deemed no longer necessary, the proposed development represents a minor variation from the "MR-12" zone and Minor Variance A-67/02 regulations and would comply with the RMU-40 Zone, as approved by City Council on September 10, 2018.

The revised proposed development complies with the City of Waterloo Official Plan and presents an improved design that achieves a high standard of Urban Design. The massing of the building has been refined to incorporate a more pronounced podium with a "point" tower located at the southwest corner of the building. The redesigned massing reduces the visual impact of the building from the townhouse dwellings to the north and the single detached dwellings and townhouse dwellings to the west. Although the revised proposed building consists of 12 storeys, which is the same as the previous design, the height of the new building is nearly 2.5 metres shorter than previous and the footprint of the tower has been decreased by approximately 49%. Additionally, the revised proposed development incorporates increased setbacks from the front, interior and rear yards, as well as sufficient landscaped open space and amenity space.

In summary, the revised development considers the comments received from Councillors and the public as part of the Informal Public Meeting and proposes a building with increased setbacks, a modified building massing, a reduction in density, and a development that would comply with the RMU-40 regulations approved under the Comprehensive Zoning By-law and aligns more comparably with the existing applicable Zoning By-law No. 1418 regulations.

### **Amended Zoning By-law Amendment**

As per the March 19, 2018 Planning Opinion Report and Zoning By-law Amendment submission, the following Site Specific Provisions were sought to facilitate the proposed development:

1. A front yard setback of 3.5 metres, whereas By-law 05-067 requires 7.5 metres;
2. A side yard setback of 2.7 metres along the western side of the subject property as the regulations of By-law 05-067 requires a side yard setback of half of the height of the building and no less than 3 metres;
3. A rear yard setback of 7.5 metres as the regulations of By-law 05-067 require a rear yard setback of half the height of the building not no less than 7.5 metres;

4. A maximum building height of 40 metres and 13 storeys as the regulations of By-law 81-088 establishes a maximum building height of 380 metres above sea level and minor variance A-67/02 establishes a maximum building height of 6 storeys on the east side of the subject property associated with the existing building;
5. An amenity area regulation of 2.5 square metres per bedroom, whereas By-law 05-067 requires 50 square metres per dwelling unit;
6. A landscaped open space of 18% of the lot area, whereas By-law 05-067 requires 30% of the lot area;
7. A parking rate of 1.3 spaces per dwelling unit, inclusive of visitor parking, whereas By-law 81-088 requires a parking rate of 1.5 spaces per dwelling unit;
8. A regulation permitting the maximum number of dwelling units on the subject property to be 181 units to address the regulation under A-67/02, which limits the number of dwelling units on the property associated with the existing building to 32 and By-law 81-088 and 05-067 establish maximums of 100 and 74 units, respectively;
9. A minimum podium height regulation of 4.5 metres;
10. A minimum tower separation to a tower on the same lot regulation of 8 metres; and
11. A maximum horizontal tower distance regulation of 66 metres.

Based on the former request noted above and the revised development proposal, we seek to amend the Zoning By-law Amendment request to establish the following Site Specific Provisions:

1. A front yard setback of 5.0 metres, whereas By-law 05-067 requires 7.5 metres;
2. A side yard setback of 3.0 metres along the western side of the subject property as the regulations of By-law 05-067 requires a side yard setback of half of the height of the building (18.75 metres) and no less than 3 metres;
3. A rear yard setback of 7.5 metres as the regulations of By-law 05-067 require a rear yard setback of half the height of the building and no less than 7.5 metres;
4. A maximum building height of 40 metres and 12 storeys as the regulations of By-law 81-088 establishes a maximum building height of 380 metres above sea level and minor variance A-67/02 establishes a maximum building height of 6 storeys on the east side of the subject property associated with the existing building;
5. An amenity area regulation of 3.0 square metres for the first bedroom and 2 square metres for each additional bedroom in the dwelling unit, whereas By-law 05-067 requires 50 square metres per dwelling unit;
6. [Remove]
7. A parking rate of 1.3 spaces per dwelling unit, inclusive of visitor parking, whereas By-law 81-088 requires a parking rate of 1.5 spaces per dwelling unit;
8. A regulation permitting the maximum number of dwelling units on the subject property to be 173 units to address the regulation under A-67/02, which limits the number of dwelling units on the property associated with the existing building to 32 and By-law 81-088 and 05-067 establish maximums of 100 and 74 units, respectively;
9. [Remove]
10. [Remove]
11. [Remove]

Request No. 6 was removed as the revised proposed development complies with the regulation requiring 30% of the lot area be landscaped open space. Request Nos. 9 through 11 were removed as the revised proposed development complies with the minimum podium height and maximum horizontal tower dimension regulations and the tower separation regulation no longer

applies to the proposal as the existing building has been incorporated into the podium of and is now attached to the proposed building.

Request Nos. 1, 2 and 5 were amended to remove the existing setback regulations and replace with the approved RMU-40 values. Although the proposed development significantly exceeds these standards, these values are proposed to ensure continuity between the Site Specific regulations of the subject property and the general RMU-40 Zone, should the RMU-40 Zone be implemented as a classification under the Comprehensive Zoning By-law. Similarly, Request No. 4 has been amended to reflect the approved RMU-40 regulation indicating 12 storeys, not 13 storeys.

Request No. 8 was amended to reflect the reduction in the number of dwelling units from 181 to 173. Lastly, Requests Nos. 3 and 7 are not proposed to be amended from the March 2018 Zoning By-law Amendment request.

### **Supplemental Information Addressing Zoning By-law Amendment Tests under the Local Planning Appeal Tribunal**

On April 3, 2018 the *Local Planning Appeal Tribunal Act* came into effect and established the Local Planning Appeal Tribunal (LPAT) in place of the Ontario Municipal Board. In support of a comprehensive municipal record with regards to the proposed Zoning By-law Amendment application and proposed development, we provide this supplemental letter, which is intended to provide additional planning analysis in addition to the original Planning Opinion Report dated March 19, 2018.

Under the LPAT, the proposed Zoning By-law Amendment is subject to the following standards of review:

- a) The existing parts of the by-law that would be affected by the amendment are inconsistent with a policy statement issued under subsection 3(1), fail to conform with or conflict with a provincial plan or fail to conform with an applicable official plan; and
- b) The amendment is consistent with the policy statements issued under subsection 3(1), conforms with or does not conflict with provincial plans and conforms with applicable official plans.

As noted, the proposed Zoning By-law Amendment will establish site specific provisions applicable to the subject property. The site specific provisions will establish specific regulations applicable to the existing multiple dwelling and the proposed multiple dwelling. The new regulations are proposed to replace the existing, multiple levels of regulations currently applicable to the subject property, existing building and lot to be redeveloped as a result of the existing City of Waterloo Zoning By-law No. 1418 as well as By-law No. 81-088 and By-law No. 05-067, which have been applied to the property as a result of separate developments and reviews, and regulations enacted through Minor Variance A-67/02. Essentially, there are four levels of zoning regulations that apply to the subject property, all of which were implemented at different times and under different circumstances. Table 4 in the Planning Opinion Report dated March 19, 2018, identified the applicable requirements based on the respective By-law documents that apply to the subject property.

The City of Waterloo Zoning By-law No. 1418 was approved to regulate the City of Waterloo lands annexed on March 31, 1960. By-law 81-088 was approved in 1981 to regulate the subject

property and a select number of surrounding large properties that were identified as likely to develop for multi-unit dwellings. By-law 05-067 was approved in 2005 to amend the “Multiple Residence” zone regulations to any property with an “MR” Zone and a site specific zoning by-law that existed prior to the passing of the City’s Height and Density Zoning By-law Amendment and Report. Lastly, Minor Variance A-67/02 was approved in 2002 for the subject property under the circumstances of a Consent to sever the original property into two parcels and to recognize the existing multiple dwelling and establish regulations on the remainder of the parcel.

With regards to Standard ‘A’, the existing multiple layers of zoning that apply to the development do not conform to the City of Waterloo Official Plan designation of the subject property as a “Minor Corridor” and “Mixed-Use Medium High Density Residential”. The “Minor Corridor” designation intends for the planned land uses of the lands to be predominantly medium to medium high density residential and encourages the intensification for higher density uses. Further, the “Mixed-Use Medium High Density Residential” designation permits a minimum density of 150 bedrooms per hectare, a maximum density of 600 bedrooms per hectare, a maximum height of 40 metres, and the predominant development of multiple unit residential dwellings. Through the application of zoning regulations requiring setbacks that are half the height of the building and the incorporation of amenity area requirements of 50 square metres per dwelling unit, and given the constraints of the location of the existing dwelling, the applicable zoning regulations severely restrict, if not prohibit, the ability for the subject property to conform to the minimum density requirements of the Official Plan.

The Provincial Policy Statement encourages the accommodation of forecasted growth within the existing built boundary through the intensification and redevelopment of existing properties. The Growth Plan for the Greater Golden Horseshoe (“Growth Plan”, 2017) further encourages the intensification of lands within the built boundary and requires that planning authorities identify appropriate lands for intensification. The Region of Waterloo Official Plan implements the policies of the Provincial Policy Statement and the Growth Plan by establishing a Reurbanization Target and requiring that area municipalities introduce policies to support reurbanization and intensification. As such, the City of Waterloo Official Plan incorporates policies encouraging residential intensification and has identified, through the Urban Structure and Land Use Designation policies, areas that are intended to and should be planned to accommodate intensification. The subject property is among the properties identified as an opportunity for residential intensification and has been designated to accommodate a medium high residential density, in support of City, Regional and Provincial policies.

The regulations subject to the Zoning By-law Amendment application are regulations that were enacted under previous planning regimes and have not been updated to reflect recent planning policies. The City is currently undergoing this process through the Comprehensive Review of the Zoning By-law of which, the final Zoning By-law was approved by Council on September 10, 2018. The zoning being proposed that implements the Mixed-Use Medium High Density Residential designation is the RMU-40 zone. The project is modeled on the RMU-40 zone but as the Zoning By-law has been approved but is not in force and effect, it also reflects the MR-12 zoning which would be appropriate under today’s standards. The current regulations (MR-12, By-law 81-088, By-law 05-067) subject to the Zoning By-law Amendment application will not facilitate the development of the subject property in a form or manner that is intended under the City of Waterloo Official Plan, Region of Waterloo Official Plan, Growth Plan and Provincial Policy Statement. Therefore, we are of the opinion that the existing parts of the Zoning By-law that would be affected by the proposed Zoning By-law Amendment fail to conform to the City of Waterloo Official Plan, Region of Waterloo Official Plan, Growth Plan, and Provincial Policy Statement and as such, the Zoning By-law Amendment meets Standard ‘A’ for review.



With regards to Standard 'B', the Planning Opinion Report demonstrated that the proposed Zoning By-law Amendment is consistent with the Provincial Policy Statement, conforms to the Growth Plan, conforms to the Region of Waterloo Official Plan, and conforms to the City of Waterloo Official Plan.

The proposed Zoning By-law Amendment is consistent with the Provincial Policy Statement (2014), as the proposed Zoning By-law Amendment will facilitate the efficient development of the subject property, located within a designated settlement area, identified as lands to accommodate development, and having access to existing municipal infrastructure and services. The proposed development contributes to an appropriate range and mix of residential uses on lands identified for residential purposes. The development does not contribute to environmental or public health and safety concerns and does not prevent the efficient expansion of a settlement area. The infill nature of the proposed development is a form of cost-effective development contributing to the minimization of land consumption and servicing costs. The development will incorporate building practices that are inclusive and accessible.

The Provincial Policy Statement indicates that settlement areas shall be the focus of growth and development. The proposed development is located within a designated settlement area and further upholds the policies for development within settlement areas by proposing an efficient use of land and resources through the infill of a vacant portion of property and the retention and improvement of the existing residential building. The development is appropriate for and will efficiently use infrastructure and public service facilities and will be constructed to meet current energy efficiency standards.

The Provincial Policy Statement encourages intensification and redevelopment, where it is appropriate and can be accommodated. In this regard, planning authorities are required to identify appropriate locations and promote opportunities for intensification and redevelopment, taking into account existing building stock and the availability of suitable infrastructure and public service facilities. The City of Waterloo implemented a new Official Plan in 2012, where the subject property was identified as part of a "Minor Corridor", which is an Urban Structure classification intended to provide opportunities for intensification and the development of medium to medium high density residential uses. Further, the lands are designated "Mixed-Use Medium High Density Residential". The proposed development, which is a form of intensification, is located on lands that were identified by the planning authority as lands to accommodate intensification through the implementation of the City of Waterloo Official Plan, which is consistent with the Provincial Policy Statement.

We are of the opinion that the proposed Zoning By-law Amendment is consistent with the Provincial Policy Statement as the proposed development is a form of residential intensification on lands identified by the planning authority for intensification and the proposed development will contribute to the efficient use of land and municipal services.

The Growth Plan (2017) builds upon the Provincial Policy Statement to establish a unique land use planning framework for the Greater Golden Horseshoe (GGH) that supports the achievement of complete communities, a thriving economy, a clean and healthy environment, and social equity. It establishes the long-term framework for where and how the GGH region will grow, while recognizing the realities facing cities and smaller communities. Among the Guiding Principles of the Growth Plan, is the prioritization of intensification and higher densities to make efficient use of land and infrastructure and support transit viability. As noted, the City has identified these lands as an opportunity for intensification and due to the underutilization of

a portion of the property, the intensification of the lands contributes to the efficient use of land and infrastructure.

The Growth Plan requires that planning authorities, in consultation with appropriate stakeholders, develop a Housing Strategy that supports the achievement of minimum intensification and density targets, as well as other policies of the Growth Plan, by identifying a diverse range and mix of housing options and densities and establishing targets for affordable ownership housing and rental housing. In preparing this Housing Strategy, the Growth Plan requires that planning authorities support the achievement of complete communities by, among other policies, planning to achieve the minimum intensification and density targets of the Growth Plan, and planning to diversify their overall housing stock across the municipality. The proposed development contributes to the Growth Plan's direction to accommodate forecasted growth through the provision of new rental housing and housing units that are permitted and an alternative to the other forms of housing available within the neighbourhood.

The Growth Plan encourages the accommodation of forecasted growth within settlement areas that have a delineated built boundary, have existing or planned municipal servicing, and can support the achievement of complete communities. The proposed development is located on lands that meet the criteria of the Growth Plan to accommodate growth. The Growth Plan encourages the application of policies that implement the achievement of complete communities that feature a diverse mix of land uses, improve social equity and overall quality of life, provide a diverse range and mix of housing options to accommodate people at all stages of life and the needs of all household sizes and incomes, expand access to transportation options, open spaces and food options, incorporate development of high quality compact built form and low impact development. The proposed development will provide a housing option that, other than the existing apartment building on the property, is not found within the surrounding neighbourhood. The Growth Plan encourages the diversification of the housing market and the proposed development incorporates the opportunity to introduce new housing units, which are permitted on the subject property through the Official Plan and Zoning By-law, in support of a compact built form and more diverse range of housing options.

We are of the opinion that the proposed Zoning By-law Amendment conforms to the Growth Plan as the proposed development will contribute towards achieving a complete community and will provide additional housing options for the neighbourhood and City.

The Region of Waterloo Official Plan designates the subject property "Built-Up Area" within the "Urban Area" with regards to the Plan's Planned Community Structure. Development within the Urban Area is intended to contribute to the creation of complete communities with a greater mix of land uses and compact and efficient development patterns. The proposed development supports the planning community structure as it is serviced by municipal services, contributes to the creation of complete communities with an appropriate development pattern and density, respects the scale, physical character and context of the established neighbourhood, incorporates an energy efficient building design, and does not negatively impact environmental features or a resident's ability to obtain locally grown food.

The Region of Waterloo Official Plan establishes that virtually all of the region's future growth will occur within the Urban Area and Township Urban Area designation, with a substantial portion of this growth directed to the existing Built-Up Area of the region through reurbanization. Further, any future development within or adjacent to established residential neighbourhoods will need to respect the existing physical character of the area. The proposed development implements the reurbanization of the subject lands within the Built-Up Area in a form that

respects the existing physical character of the area through incorporation of complementary building materials, building stepbacks, and a podium to contribute to a human-scale public realm on Beechwood Drive along the frontage of the property.

The Region of Waterloo Official Plan establishes a Reurbanization Target for the delineated built boundary for the region, requiring that area municipalities include policies in their official plans to ensure that a minimum of 45 per cent of all new residential development occurring annually within the region as a whole will be constructed within the Built-Up Area. The proposed development will contribute towards achieving this Regional Reurbanization Target. Further, to implement the Reurbanization Target, area municipalities were required to establish City/Area specific targets, identify areas to accommodate growth to support the achievement of the target, and where appropriate, establish minimum density targets for priority reurbanization areas. In this regard, the City of Waterloo has incorporated into their Official Plan Urban Structure and Land Use policies, minimum and maximum density targets and identified specific areas, such as Nodes and Corridors, where intensification and reurbanization are encouraged. The subject lands are among the properties identified under these policies and where intensification and reurbanization are encouraged.

Further, the Region of Waterloo Official Plan requires that area municipalities establish policies in their Official Plans that promote the development of previously developed land, such as brownfield sites and greyfield sites, located throughout the Urban Area and Township Urban Area. The subject property is considered a “greyfield” property, as it was previously developed but not contaminated, and as such, the redevelopment of the lands is promoted.

We are of the opinion that the proposed Zoning By-law Amendment conforms to the Region of Waterloo Official Plan as the proposed development will facilitate the reurbanization of a greyfield property within the Built-Up Area, contribute to the creation of complete communities, and contribute towards the regional Reurbanization Target in a form that is compact and compatible with the surrounding established neighbourhood.

The City of Waterloo Official Plan is the primary tool for implementing Provincial and Regional policy and it establishes the long-range, comprehensive municipal planning document that outlines a framework for land use decision-making for the City of Waterloo. The document contains principles, objectives and policies designed to direct the form, extent, nature and rate of growth and change within the municipality to the year 2031. The City of Waterloo Official Plan acknowledges that there is a limited supply of vacant land for future urban growth and to ensure that growth as forecasted can be accommodated, land within the City must be used more efficiently and a significant proportion of the City’s growth is expected to be accommodated through intensification within the existing Built-up Area, resulting in changes to height and density in existing areas. Focal points for intensification include, among other areas, Nodes and Corridors.

Under the City of Waterloo Official Plan, the subject property is located within a designated “Minor Corridor” and has a land use designation of “Mixed-Use Medium High Density Residential”.

The proposed development supports the general objectives of the City of Waterloo Official Plan through the intensification of a property within a designated Minor Corridor, contribution to the creation of complete communities, the establishment of an urban form that contributes to an appropriate mix of land uses and range and mix of housing types, sizes, costs and tenure within the neighbourhood. The City of Waterloo Official Plan also encourages residential

intensification, recognizing that intensification will occur, primarily, in the series of designated Nodes and Corridors, including the application of minimum and maximum residential densities.

Lands identified as “Medium High Density” are subject to a minimum permitted density of 150 bedrooms per hectare and a maximum permitted density of 600 bedrooms per hectare. The subject property, as it currently exists, consists of 70 bedrooms with a density of 95 bedrooms per hectare, which is 55 bedrooms per hectare less than the minimum required density under the City of Waterloo Official Plan. The development proposes a total of 283 bedrooms and a density of 384 bedrooms per hectare, which conforms to the minimum and maximum density policies of the Official Plan. The proposed development also conforms to the maximum height policy permitting a maximum height of 40 metres as the new building is proposed to be 37.5 metres tall.

As noted previously, the Minor Corridor designation is intended to accommodate predominantly medium to medium high density residential with some limited areas having a planned function other than residential, such as commercial. Intensification is encouraged within Nodes and Corridors through the application of land use designation that permits medium to high density uses. Development within designated Nodes and Corridors shall demonstrate compatibility and integration with surrounding land uses and contribute to an animated streetscape. The proposed development incorporates an appropriate height, use, architectural design, siting, parking, and massing elements that encourage compatibility with the surrounding land uses. Further, construction of new low density uses is discouraged within the designated Nodes and Corridors. Similarly, intensification of existing low density housing to higher density multiple residential buildings will be encouraged within designated Nodes and Corridors through the application of minimum densities on residential lands.

The designation of the subject property for “Mixed-Use Medium High Density Residential” establishes that the intended predominant use of the property is for multiple residential buildings and it is intended that lands within this designation provide opportunities for “substantial levels of intensification”. Within this designation, multiple unit residential buildings are permitted. The proposed development conforms to this land use designation, as the existing and proposed multiple unit residential buildings are permitted and the lands have been identified for substantial levels of intensification.

We are of the opinion that the proposed Zoning By-law Amendment conforms to the City of Waterloo Official Plan as the urban structure and land use designations of the subject property identify the lands for residential intensification and the proposed use of the property, as well as the height and density, conform to the applicable Official Plan policies. The City of Waterloo Official Plan encourages the efficient use of land and intensification of properties within the built-up area to accommodate forecasted growth and the proposed development implements that vision in a form that is compatible with the surrounding neighbourhood.

The City undertook a considerable public process during the completion and adoption of their Official Plan. The Official Plan established the framework and permissions for what development is to occur. Additionally, the subject lands were identified for this type of density in the previous Official Plan.

In summary, as demonstrated in the original Planning Opinion Report and further within this letter, the proposed Zoning By-law Amendment is consistent with the Provincial Policy Statement and conforms to the Growth Plan, both of which encourage compatible redevelopment and intensification on underutilized parcels within designated settlement areas

and within the built boundary. Further, the proposed Zoning By-law Amendment conforms to the Region of Waterloo Official Plan and the City of Waterloo Official Plan. Therefore, we are of the opinion that the proposed Zoning By-law Amendment meets Standard 'B' for review.

On this basis, and in consideration of the LPAT standards of review, it is our opinion that the application, as resubmitted, would meet the criteria to facilitate a review by the Council of the City of Waterloo at this time and that the two applicable standards of review for Zoning By-law Amendment applications have been met.

This material is a concerted effort by the owner and the consultant team to address comments that were provided while still having regard to and implementing the Official Plan. We would respectfully suggest that any project to a lesser density or built form does not implement the Official Plan or accomplish the vision established by the City of Waterloo.

We trust that the above information, new materials, and previously submitted information are sufficient to facilitate the review and consideration of this application at this time. If you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,  
**Labreche Patterson & Associates Inc.**

A handwritten signature in black ink that reads "Scott Patterson". The signature is written in a cursive, flowing style.

**Scott Patterson, BA, CPT, MCIP, RPP**  
**Principal, Senior Planner**

SP/am

*Copy: 508 Beechwood Inc.*