

April 17, 2018

Ms. Wendy Fisher
Development Planner
Integrated Planning and Public Works
City of Waterloo
100 Regina Street South
Waterloo ON N2J 4A8

Dear Ms. Fisher:

**RE: Official Plan Amendment No. 21 and Zoning Bylaw Amendment Z-18-02, 70 King St. N.
Planning Justification Addendum Letter and Parking Justification
OUR FILE 1350 'D'**

MHBC Planning has been retained by HIP Developments Inc. to complete a Planning Justification Addendum Letter and Parking Justification, in support of changes made to the original application, submitted to the City of Waterloo in December 2017 and further to the previous Planning Justification Report dated November 2017. The purpose of this Addendum Letter is to provide a summary of the changes made to the development, to provide planning analysis and rationale in support of those changes and to provide planning rationale and support for the requested parking reduction.

1.0 Provincial Planning Framework

The Provincial Policy Statement (2014) establishes a vision for Ontario that includes efficient development patterns that optimize the use of land, resources and public investment in infrastructure and public service facilities. All three levels of government (municipal, provincial and federal) have made significant investments in transit infrastructure in Waterloo, including within Uptown Waterloo. The intent of this investment was to focus growth in key areas of the city, offer a high frequency transit service and thereby reduce the dependence on the automobile and its associated traffic and environmental impacts. The proposed development represents intensification of an area in the centre of Waterloo's Urban Growth Centre, within 320 metres of an LRT Station, which offers high frequency transit service within Waterloo and Kitchener with extensions through BRT service to Cambridge.

As the City is aware, development of the subject lands will require approvals from the Province will regard to a Record of Site Condition. Section 1.1.3.3 of the PPA requires that planning authorities' identify appropriate locations and promote opportunities for intensification and redevelopment, including brownfield sites.

The Growth Plan (2017) further emphasizes support for transit use by specifically stating within its "principles" that the Plan will:

- Prioritize intensification and higher density to make efficient use of land and infrastructure and support transit viability.
- Provide flexibility to capitalize on new economic and employment opportunities as they emerge.

Section 2.2.1.2 of the Growth Plan states that within settlement areas, growth will be focused in locations with existing or planned transit, with a priority on higher order transit where it exists or is planned. Higher order transit exists in Waterloo Region, with the nearest station less than 320 metres from the subject lands.

Section 2.2.4 of the Growth Plan states that planning will be prioritized for major transit station areas on priority transit corridors, including zoning in a manner that implements the policies of this Plan. The Plan identifies the LRT / BRT route through Waterloo Region as a priority transit corridor. The subject lands are located in close proximity to the corridor and the LRT.

Section 2.2.9 of the Growth Plan states that within all major transit station areas, development will be supported, where appropriate, by:

- Providing alternative development standards, such as reduced parking standards;
- Prohibiting land uses or built form that would adversely affect the achievement of transit-supportive densities.

Although the City did not identify a major transit station area for any portion of the Urban Growth Centre, many of the policies contained within the Growth Plan are relevant in clarifying the Provinces' intent with regard to development within close proximity to high-order transit. The Growth Plan suggests that the size of the area and the number of potential users that are within walking distance of the station should be maximized. The Growth Plan defines a Major Transit Station Area as "the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 metre radius of a transit station." The subject lands are located within 320 metres of an ION transit station.

In our opinion, both the PPS and in particular the Growth Plan direct high density development to locations such as the subject lands and place a greater emphasis on the need for intensification within 500 metres of a station.

For analysis of the broader policy framework, including other aspects of the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the Region of Waterloo Official Plan, please refer to the previously submitted Planning Justification Report.

This Letter also summarizes the other supporting studies, which have been updated to reflect changes to the buildings' design and respond to comments received at the Informal Public Meeting on March 5th, 2018.

2.0 Summary of Changes to Official Plan and Zoning By-law Amendment

Subsequent to the submission of the application in December 2017, HIP Developments undertook design changes to the building in response to early feedback, to eliminate the potential need for permanent dewatering due to the underground parking structure and to enhance the architectural design of the building. In addition to changes to the design of the building, HIP Developments proposes to use the commercial space within the building to initiate a STEAM based facility, called LAUNCH. The following two tables summarize the changes to the original design of the building and the requested Official Plan and Zoning By-law Amendments.

Table 1: Changes to the Development

	Original Submission	Revised Submission
Lot Area	4,590 m ²	4,338 m ² (after road widenings)
Amenity Area	1,150 m ²	1,117.6 m ²
Height	Tower A – 16 storeys (58.25 m) Tower B – 22 storeys (77.45 m)	Tower A – 11 storeys (45.85 m) Tower B – 24 storeys (79.25 m)
Density	729 beds/ha 263 units 335 beds	846 beds/ha 321 units 367 beds
Parking	141 non-residential 277 residential 418 total	56 non-residential 252 residential 308 total
Underground Parking	2 levels (5-6 m below water table)	1 level (0.3 m above water table)
Non-residential space	3,249 m ² (34,980 sq. ft) office space 754 m ² (8,120 sq. ft) retail/restaurant use	3,692 m ² (39,750 sq. ft) LAUNCH /museum/institutional use 325 m ² (3,500 sq. ft) retail/restaurant

Table 2: Summary of Revised Request

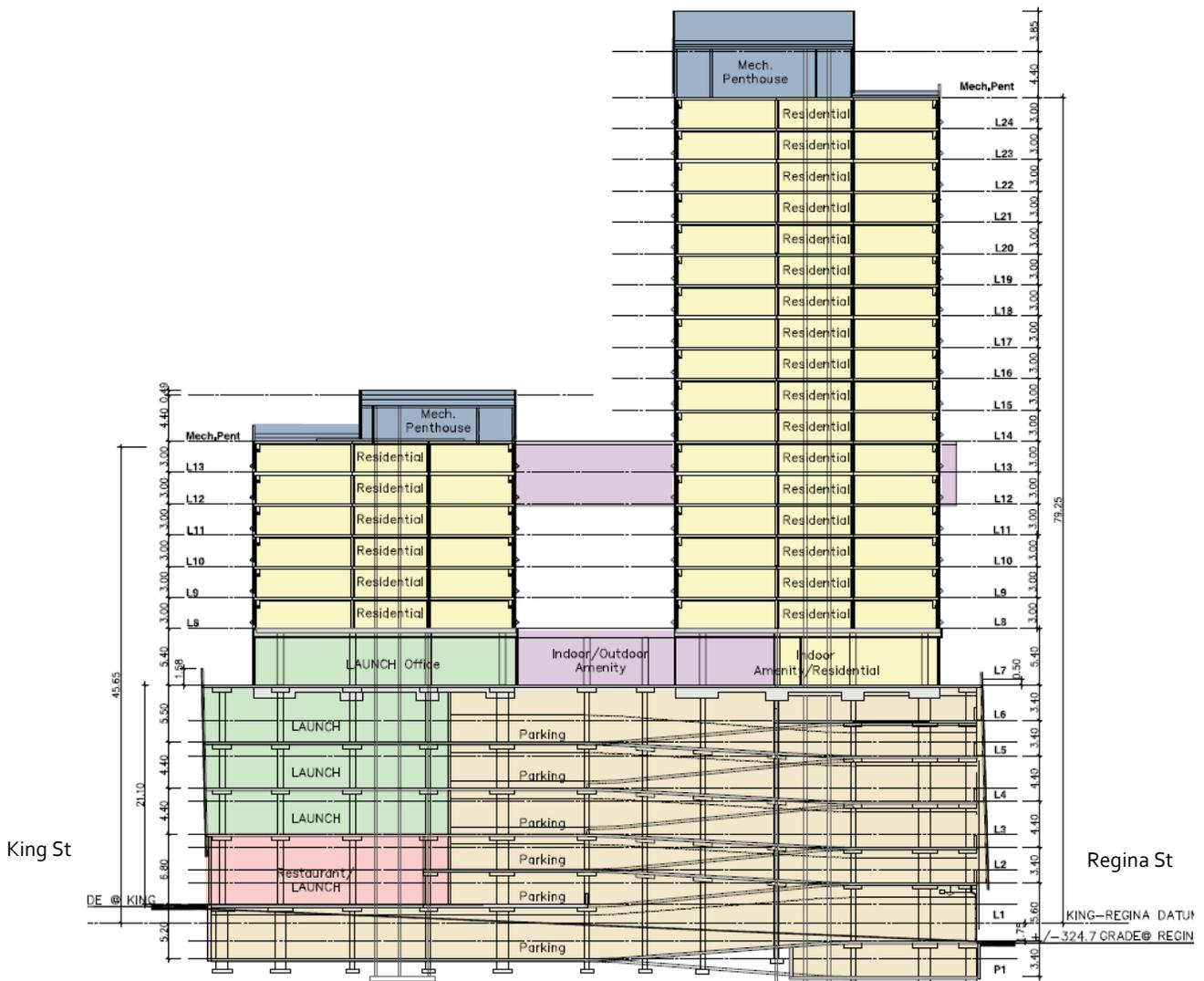
Official Plan	Original Request	Revised Request
"Main Street" designation – Maximum Height 16 m	Specific Provision Area to increase maximum height to 58 m	Specific Provision Area to increase maximum height to 46 m
Zoning By-law		
12C.2.1.6.2 Commercial Eight (C8) zone – maximum height within 30 m of King St – 16 m (4 storeys) and By-law 05-066 – 14 m (4 storeys)	Increase the maximum permitted height within 30 m of King St to 58 m (15 storeys)	Increase the maximum permitted height within 30 m of King St to 46 m (11 storeys)
12C.2.4 The maximum Floor Area Ratio (FAR) shall be 4.0	Increase the maximum FAR to 12.4	That Section 12C.2.4 not apply
12C.2.5.1	To permit roof-top amenity	The development now complies

That each dwelling unit is to be provided with 5 square metres of amenity area. Amenity Area does not include roof-top decks	area to contribute towards the required amenity area	with the by-law and no amendment Section 12C.2.5.1 is required.
12C.2.5.5 The maximum density is 250 units per hectare	To permit a maximum density of 571 units per hectare	To permit a maximum density of 846 bedrooms per hectare (after road widenings)
12C.2.2.1 and 12C.2.5.2 Minimum parking required for commercial and institutional uses is 2.15 spaces per 100 m ² of floor area Minimum parking required for residential uses is 1 space per unit	No changes to the parking requirements proposed	That commercial and institutional parking be provided at 1.4 spaces per 100 m ² of floor area That no parking be required for ground floor retail or restaurant uses That residential parking be provided at a rate of 0.785 spaces per unit

3.0 Building Height

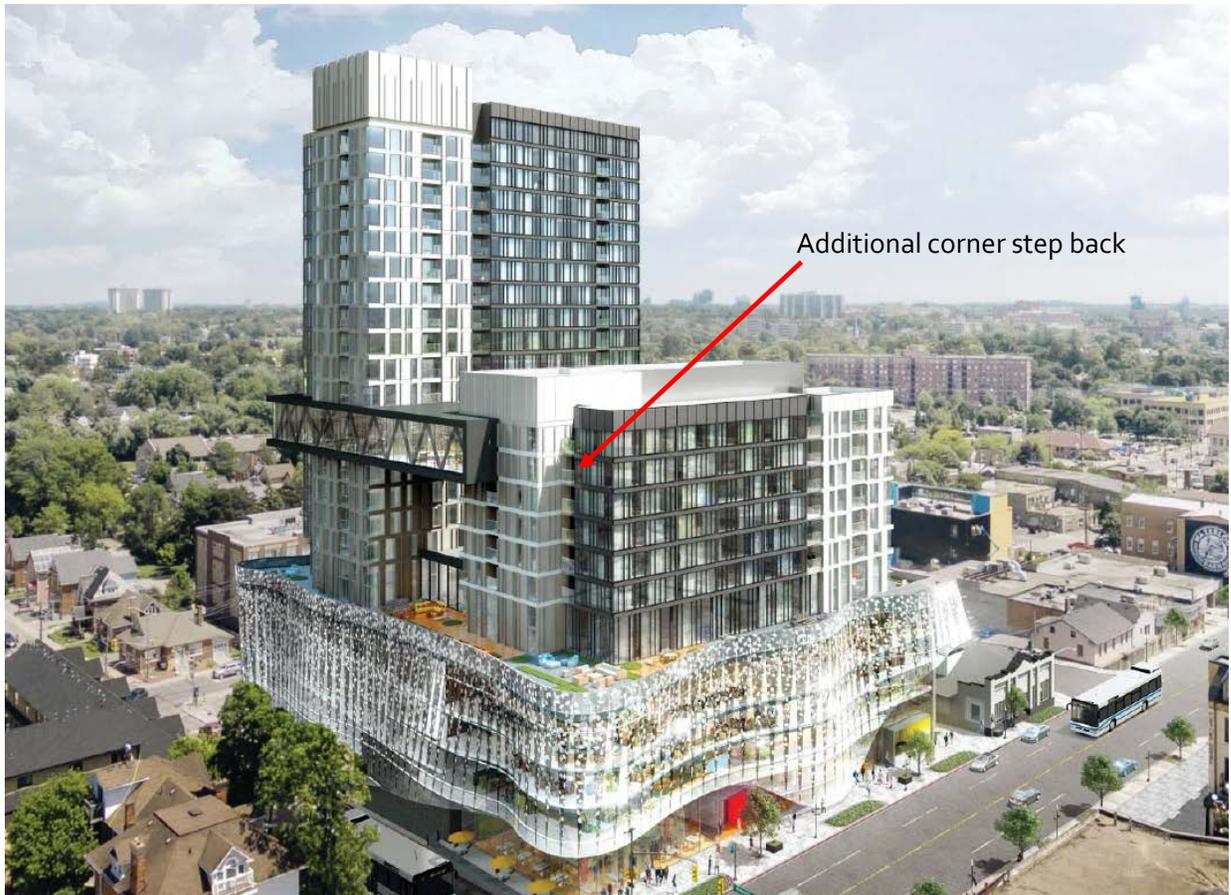
As noted above, both the Official Plan and Zoning By-law limit the height of buildings within 30 metres of King St, between William St and Young St. The King St portion of the subject lands is subject to those policies/regulations and an Official Plan and Zoning By-law amendment was submitted requesting an increase in height to 58 metres. The revised development proposal reduces this request from 58 metres to 46 metres.

The building located closest to King Street contains 11 storeys, primarily composed of the non-residential uses (LAUNCH) within the base of the building and six (6) floors of residential units above. The cross-section below shows the design of the building facing King and Regina Streets.



The cross-section demonstrates that the height of the podium, as seen from King St is 4 storeys and 21.1 metres tall, which is the same number of storeys permitted in the Official Plan and C8 zone, but is 5.1 metres taller than the maximum measured height (16 metres). Above the podium, the building takes a significant step back towards Regina St, which reduces the appearance of the 11-storey

building at the pedestrian level. The following rendering also shows how the building has a further step back at the corner of Bridgeport Rd and King St.



The combination of the strong, defined podium and the step backs will reduce the visual impact of the 11 storey building along King Street.

Section 3.7.2 of the Official Plan states that the Uptown Urban Growth Centre will be planned to achieve balance between meeting density targets through intensification and the need to retain Uptown's sense of community and identity. Subsection (2) states that the City will plan for land uses that support a pedestrian-oriented environment with the Uptown. The proposed development, with its strong podium, active uses at grade along all three streets and emphasis on high quality architecture and urban design will augment the existing pedestrian experience along King St, Bridgeport Rd and Regina St. The existing King St streetscape is shown on the following page:



Photo 1: Looking south along King Street from Bridgeport Road. The streetscape lacks definition, landscaping and associated features. The recent City streetscape project did result in new sidewalks and the replacement of the streetlights.



Photo 2: Looking northeast towards the existing building, with the recent changes to the streetscape evident – raised bike lanes and on-street parking.

It is evident that despite changes to the public realm as part of the King Street streetscape project, there remains a distinct lack of identity for this portion of King Street. The lands on the east side of King Street, north of Bridgeport Road are a mixture of building types, heights and setbacks. Some have driveway entrances directly from King Street, with large paved areas in front of the building and significant gaps between the buildings. The building types and materials differ considerably.

The buildings on the west side of King Street, north of Bridgeport Road have a more uniform setback up to Young Street, with the buildings virtually abutting the public sidewalk. The building form (and materials) differs, but generally maintains a 2-storey height, with gaps in the street wall to accommodate vehicular entrances and parking.

South of Bridgeport Road, the streetscape has undergone changes as a result of the City's capital project, with a desire to accommodate spill out patio spaces. The buildings on the west side of the street are a mixture of heights, built form and materials. The Huether Hotel remains a constant, however immediately to the north of the hotel is a raised patio/deck, with surface parking accessible and visible from the street. The recently constructed 8-storey apartment building at 14 Princess Street West is visible to the rear. On the east side of the street is a night club/restaurant that has undergone several changes over the years, in terms of tenants and facades (it is located immediately adjacent to the proposed development). The height of buildings between Princess Street and Young Street along King Street are generally one or two storeys, with the Huether Hotel being a notable exception.

Section 3.7.2(4) states that it is a policy of the Plan to encourage, reinforce and improve the architectural integrity of buildings within the Uptown Urban Growth Centre. The Main Street designation permits a height of up to 16 metres (4 storeys). The C8 zone, which applies to all of the properties fronting King St between Princess and Young Streets, permits the same height (site

specific by-law 05-066 lowers the measured height from 16 to 14 metres, however 4 storeys are still permitted). As such, through existing as-of-right zoning, all of the buildings along this portion of King Street, save for any that are designated heritage buildings, could redevelop into 4 storey, 14-16 metre tall buildings. Such a change to the buildings along King Street would undoubtedly create a new character for this portion of Uptown, with a new pedestrian feel and experience and a new architectural expression. As such, although the policy would appear at first glance to be intended to preserve things “the way they are”, the policy and implementing zoning in fact permit and encourage change through redevelopment.

Despite the general height regulation within the Main Street designation, Policy 3.7.2(4)(b)(i) allows for increases beyond 16 metres / 4 storeys, “subject to the applicant demonstrating to the City’s satisfaction that the four storey built form character and massing of the streetscape is maintained through an appropriate upper storey façade setback and other massing and supporting design strategies.” As such, the Official Plan limit of 4 storeys / 16 metres is flexible and the implementing policies do allow for increases in height, subject to design considerations. This reinforces the encouraging policy framework established by the city to permit the redevelopment of King Street between William and Young Streets.

As noted above, this portion of King Street does not possess a “four storey built form character”. Such a built form character is envisioned and encouraged in the Official Plan, but does not yet exist. Nevertheless, the proposed development does propose a strong 4-storey podium, consistent with the policy direction and does include upper storey façade setbacks between the podium and the remainder of 11 storey building. The step back above the podium ranges from 6 to 8 metres, which is significantly greater than the requirement in the Draft Zoning By-law (3 metres) and the existing Northdale Mixed-Use (NMU) Zone (also 3 metres) for buildings with podiums.

As described above, the character of this portion of King St varies considerably in terms of building design, height, setback and pedestrian experience. While the Official Plan contemplates a 4 storey limitation (with allowable exceptions) on buildings along this stretch of King St, the only 4 storey building in the vicinity of the subject lands is the Huether Hotel. The vast majority of the buildings on King St from Princess to Young St are 1-2 storeys. The Official Plan policies and Zoning By-law provisions envision and permit redevelopment of the lands, as they do for the majority of the lands along King Street that are designated “Main Street.” The subject lands are proposing a development that recognizes that redevelopment is appropriate in this area, and is in fact both permitted and encouraged in the Official Plan and Zoning By-law.

It is not the concept of redeveloping the lands with a 4-storey podium that is the subject of the Official Plan Amendment, but rather how close the “taller” portion of the building (at 11 storeys) can get to King St. Similarly, it is not even the concept of having a tall building close to King Street that is the subject of the application, as there are numerous properties along King St that can accommodate (and are zoned to permit) a 25 storey building in close proximity to King St. The request can be described as reducing the setback from King Street from 30 metres to less than 30 metres. The use of a step back, the presence of a strong pedestrian scale podium, the modest height of the building and the high quality design will all serve to preserve the feel of King St as a pedestrian focused environment. The 11-storey building will not dominate the streetscape, but rather, will complement the skyline and signal that appropriately designed developments at the fringes of the “Main Street” designation are desired in the Uptown.

4.0 Density

The Official Plan regulates residential density through bedrooms per hectare rather than units per hectare, which is commonly applied in other municipalities in Ontario. The City's Official Plan generally divides density into four categories, or designations:

- Low Density Residential, with a maximum density of 150 bedrooms per hectare;
- Medium Density Residential, with a maximum density of 450 bedrooms per hectare;
- Medium-High Density Residential, with a maximum density of 600 bedrooms per hectare; and
- High Density Residential, with a maximum density of 750 bedrooms per hectare.

The subject lands are designated "Main Street, 6 metres to 16 metres" and "High Density, 81 metres." Within both the High Density and Main Street designations, the maximum permitted density is 750 bedrooms per hectare. Although the original request noted the change in density measurement, the requested amendment to the Zoning By-law was still characterized as units per hectare.

The Commercial Eight (C8) zone pre-dates the City's Official Plan. One of the fundamental changes the Official Plan made (as compared to the previous Official Plan) was to change the manner in which residential density is measured. The previous Official Plan (and the C8 zone) measured density in units per hectare, whereas the current Official Plan measures residential density in bedrooms per hectare. The City is currently reviewing its Zoning By-laws and has released two drafts to date. The most recent draft of the new Zoning By-law measures density in bedrooms per hectare. However, until such time as a new Zoning By-law is in force and effect, the existing provision that measures residential density in units per hectare continues to apply. The proposed development seeks to change the manner in which density is measured, to bedrooms per hectare, consistent with the Official Plan. Given the Official Plan policies and direction in the City's Draft Comprehensive Zoning By-law, it is more appropriate to measure density in bedrooms per hectare.

The proposed development includes 321 units and 367 bedrooms. Given the lot area (after road widenings), this equates to a density of 846 bedrooms per hectare, which exceeds the maximum permitted in the Official Plan. Section 12.3.1 permits increases in density beyond the maximum in the Official Plan, through an amendment to the Zoning By-law, for lands that satisfy the following criteria:

- (a) The lands are located within a designated Node or Corridor; and
- (b) The lands are well served by existing or planned transit.

The subject lands are located within the City's Primary Node (and Urban Growth Centre) and are well served by transit. The ION stations at the Waterloo Public Square and Willis Way are within walking distance, and the lands have access to multiple bus routes on Regina Street, Bridgeport Road and Erb Street. As such, the lands satisfy both criteria, and are eligible for consideration of density bonusing.

Density bonusing is typically granted to developments in exchange for facilities, services or matters ("community benefits") which are listed in Section 12.3.1.5. Amongst those matters considered by the City as community benefits in exchange for increases in height and/or density are the following:

- (i) Remediation of a contaminated site;

- (l) Provision of community facilities, such as arts or cultural facilities, community centres or recreation facilities, or child care centres.

The proposed increase in density represents an additional 42 bedrooms beyond the maximum permitted in the Official Plan. The costs to remediate the lands are substantial and the public benefit of rehabilitating a vacant underutilized brownfield site and redeveloping the lands with a high quality mixed use building represent a significant community benefit.

Furthermore, the proposed commercial space facing King St will contain a new use, LAUNCH (which was described to Council and staff at the Informal Public Meeting), that will foster the growth of Waterloo's residents, young and old alike, in areas of math, science, arts and culture. HIP Developments proposes to dedicate a portion of the non-residential space within the building to help start this initiative. The LAUNCH facility will provide a venue that will foster innovation, creativity and collaboration. The combination of the LAUNCH proposal and the dedication of a portion of the space by HIP Developments represent significant community benefits for residents in the immediate area and those in the broader community.

The Official Plan notes that amongst other matters, when considering increases in height or density, the city will ensure:

- The site is suitable for the proposed density, in terms of parking, landscaping and other site specific requirements;
 - The proposed increase in bedrooms represents less than a 12% increase in density
 - There are no landscaping requirements in the C8 zone, however, the King, Bridgeport and Regina streetscapes will be dramatically improved as a result of the development, with high quality urban design, architecture and active spaces. Currently the site contains a vacant building that fails to address Bridgeport Rd and that contains a one storey building, with a substantial amount of concrete in the façade facing King St. The remainder of the Bridgeport Rd and all of the Regina St interface is made up of surface parking that is paved right up to the sidewalk.
 - The development includes an appropriate amount of parking, given its location, which will be further discussed later in this Addendum.
 - The development does not require relief from any setbacks.
- Any increase in density is compatible with the planned scale and character of the surrounding neighbourhood and has minimal impact on neighbouring land uses; and
 - The lands are planned for high density and have been for more than 10 years
 - The increase in density amounts to 47 additional bedrooms, which is less than 12% of the total number of bedrooms proposed (and permitted) on the site.
 - The surrounding road network includes two Regional Roads and a City Minor Collector Road. The transportation network is further enhanced by cycling routes along King St, transit routes along Regina St and convenient access to the ION LRT system, within 320 metres of the subject lands. The Spurline and Laurel Trails are located to the south less than 300 metres away.
 - The proposed commercial uses include community based facilities that will have positive impacts on the surrounding neighbourhood.
 - The high quality of design will further enhance the recent transition occurring along Bridgeport Road and Regina Street and the northern portion of Uptown Waterloo.

The subject lands are a gateway location for those travelling into the Uptown and will signal the City's intention and desire to encourage a high level of design for future buildings.

- Surrounding lands have been planned to be of similar height and massing, or to act as transition properties into the lower density neighbourhood further to the east and northeast. Should the surrounding lands on King St redevelop to their permitted height of 4 storeys, the proposed podium will complement that building scale ensuring the streetscape remains consistent.
- That community services, infrastructure and transportation impact issues are adequately addressed.
 - The previously submitted technical studies and their accompanying updates demonstrate that the proposed development can be accommodated within the existing road network and that existing municipal services are available.

As such, the proposed development, which represents a small increase in density, satisfies the applicable policies in Section 12.3.1 of the Official Plan.

5.0 New Use – LAUNCH

At the Informal Public Meeting, the concept of LAUNCH was presented to Council, the public and staff. LAUNCH will become a destination where the youth of Waterloo Region learn how to make and innovate, to celebrate creativity and the creative capital culture that Waterloo has developed. City staff has requested that the use be categorized for the purposes of determining if it is permitted within the existing zoning, or requires permission for a new use. The following table lists the permitted uses within the C8 zone.

Table 3: Permitted Uses in the C8 zone

Auditorium	Bank or Trust Company	Commercial Recreation
Commercial School	Funeral Home	Hotel
Nursery School	Office	Parking Facility
Personal Service Shop	Picture Framing	Private Club or Lodge
Restaurant	Retail Store	Taxi-Dispatch (office only)
Video/Pinball Amusement Centre	Dwelling units in storeys above the first storey	Art Gallery
Government Use	Library	Museum
Nursery School	Park, Playground	Post Office
Religious Use		

The City passed a general amendment to the Zoning By-law in 2017 that introduced a number of new uses to the commercial zones within the Uptown Urban Growth Centre. For the C8 zone, the following additional uses are permitted:

- Artist Studio (Class A)
- Business Incubator
- Educational Institution
- Makerspace (Class A)
- Nanobrewery
- Personal Brewing Establishment
- Public Market
- Tech Office
- Temporary Farmers Market
- University/College

The amendment to the by-law also included several definitions for the above uses. In particular, the following are applicable to the subject lands:

- Educational Institution
 - Means a not-for-profit organization, foundation or think tank devoted to education and or educational research, analysis and training
- Makerspace (Class A)

- Makerspace means a community workshop or community studio that is dedicated to nurturing creativity, collaboration and hands-on learning through the provision of shared do-it-yourself space where like-minded individuals can gather and interact to:
- Create (make, build), invent, tinker, explore, learn; and
- Share ideas, resources (tools, materials), knowledge and skillsets.
- A Class 'A' Makerspace means a Makerspace where patrons:
 - Have access to low-impact tools and technology such as:
 - 3D printers
 - Arts and crafts equipment (such as easels, sewing machines)
 - Computers
 - Electronics, such as audio and visual devices
 - Hand tools
 - Microcontrollers for prototyping, digital devices, and interactive objects
 - Mixed media
 - Robotics
 - Software
 - Vinyl cutting equipment
 - Can learn and develop low-impact skills such as:
 - Coding
 - Cooking
 - Gaming
 - Painting
 - Sculpting and woodcarving using hand tools
 - Sewing and knitting

The proposed LAUNCH use will have components of the above uses, and components consistent with a "museum" (which is not defined in the By-law) combined into one facility. As such, the use is already permitted on the subject lands and no amendment to the by-law is required.

6.0 Floor Area Ratio

The C8 zone imposes a maximum floor area ratio of 4.0. The C8 zone does not require front, flankage or side yard setbacks and as such, many buildings within the zone are built to the lot line, with either parking in the rear, or within a structure. The C8-25 zone permits buildings up to 25 storeys (75 metres) in height. In this regard, the height and residential density permissions are inconsistent with the maximum floor area ratio restriction.

As the City is aware, Waterloo has a high water table, which makes the construction of underground parking challenging. Often, due to the high water table and the need to provide parking on site (as per City requirements), providing some above grade structured parking, is the only option. As such, it would be very difficult for a proposal to achieve (or come close to) the maximum height and/or density and still comply with the floor area ratio provision, particularly when it must include structured parking (due to the high water table). Given the desire for the City to realise intensification and redevelopment within the Urban Growth Centre and the desire of the Region to intensify areas near ION Stations, it is appropriate to measure the massing of the building through other provisions of the by-law (e.g. height, setbacks).

7.0 Amenity Area

The proposed development includes the following amenity area:

- Level 7 – 517 square metres
- Balconies of various units on levels 8-24 – 717 square metres
- Indoor Bar / Fitness Area and Lounge – 522 square metres

The total amenity area is 1,756 square metres. For 321 units, the by-law would require 1,605 square metres. As such, the development complies with the requirement of the C8 zone and no amendment is required.

8.o Parking Justification

Policies related to the provision of parking are provided under Sections 3.6.6 and 6.6 of the Official Plan. Section 3.6.6 discusses parking within designated Nodes and Corridors. As noted above, the subject lands are located within the Uptown Waterloo Urban Growth Centre which is considered the City's Primary Node. According to Section 3.6.6:

The City will plan for appropriate, well designed public parking opportunities in designated Nodes and Corridors, and will plan for reduced reliance on the automobile by implementing transportation demand management and supporting transit and active transportation. In planning for the appropriate type and amount of parking in Nodes and Corridors, the policies included in the Transportation Chapter of this Plan, specifically section 6.6 shall be considered in addition to the following:

- (3) Parking requirements will be defined in the Zoning By-Law and may include provisions for:
 - (a) Minimum and maximum amount of parking to be provided, including maximum limits on surface parking.
 - (b) Reduced parking standards that may be permitted where sharing of parking facilities or areas is feasible, transit service is readily available and/or there is a demonstrated community benefit that supports a parking reduction.

With respect to the specific parking policies provided under Section 6.6 of the Official Plan, Section 6.6.1 (5) is particularly relevant to this application and provides that:

To encourage walking, cycling and transit movement as preferred modes of travel, the City may consider defining and applying through the Zoning By-Law, parking standards that:

- (b) Limit surface parking;
- (f) Apply reduced vehicular parking requirements for development, giving consideration to access to transit, potential for shared parking, potential for small and/or micro spaces and/or other considerations that the City may deem appropriate.

The Region and City have provided many transit and active transportation opportunities within the Uptown Waterloo Urban Growth Centre which support a reduced reliance on the automobile and reduces the necessity for parking on the subject lands. Most noteworthy is the anticipated operation of ION, the Region's LRT system. There are two stations within close proximity to the subject lands:

- Waterloo Public Square, which provides northbound access along the route
- Willis Way station, which provided southbound access along the route.

In addition to LRT, the following bus routes operated by Grand River Transit are located in proximity to the subject lands:

- iXpress Route 200 which provides access within Waterloo through to downtown Kitchener, Fairview Mall and Sportsworld
- Bus Route 5 which provides access along Bridgeport Rd and Erb St between the Boardwalk, Uptown Waterloo and Bridge St E

- Bus Route 7, which provides access along King St and Weber St between Conestoga Mall and Fairview Park Mall.

Furthermore, the City operates several surface parking lots in the immediate area (at the library, Regina and Bridgeport Streets, the Station lot at Erb and Regina) as well as surface parking spaces on King Street, immediately adjacent to the subject lands. These spaces can provide short term parking options for visitors to the building who may be dropping off users of the LAUNCH facility. The design of the site also includes a layby/drop off area on Regina Street for those accessing the residential building closest to Regina St.

The City has also recently reconstructed King St, south of Bridgeport Rd and has included segregated cycling lanes on both sides of the street, along with wider sidewalks. It is also our understanding that the Region of Waterloo will be reconstructing the section of King St between Bridgeport Rd and University Ave, with a similar inclusion of dedicated cycling infrastructure and wider sidewalks.

The proposed development includes 321 units and 4,018 m² of non-residential floor space. The Commercial Eight Zone requires parking as follows:

Table 4: Required Parking in C8 Zone

	Residential	Non-Residential
Parking Rate	1 space/unit	2.15 sp / 100 m ² of BFA
Number of required spaces	321	87 spaces

The proposed parking supply is outlined in the following table:

Table 5: Parking supply

	Residential	Non-Residential
Number of spaces	252	56
Parking Rate	0.785 sp/unit	1.4 sp/100 m ²

The proposed residential rate is a minor reduction from the by-law requirement and is reflective of the location of the subject lands – in an area of the City that is well served by transit, alternative transportation options and that is very walkable.

The City is in the process of updating its Zoning By-laws to conform to the 2012 Official Plan. In this regard, they have released two drafts of the By-law, the most recent of which zoned the subject lands Uptown Commercial Core (U1). The Draft By-law also proposed a “parking overlay” which reduces the amount of required parking based on several factors, such as proximity to transit. The greatest reduction (50%) applies to the subject lands. The following table outlines the required parking under the Draft Zoning By-law.

Table 5: Required Parking in Draft Zoning By-law

	Residential	Visitor	Non-Residential
Parking Rate	1.25 sp/unit (-50%)	0.1 sp/unit	4 sp/100 m ² (-50%)
Number of Required Spaces	201 spaces (321 units)	33 spaces (321 units)	81 spaces (4,018 m ²)
Total Required Spaces	315 (308 proposed)		

Although the distribution of spaces is not the same as that in the proposed by-law, the proposed development includes 308 spaces, which is only 7 spaces fewer than what is required in the Draft Zoning By-law.

We note that the majority of the commercial uses along King Street in Uptown Waterloo do not provide their own parking spaces, but instead rely on both on-street parking and surrounding public parking lots. The Museum in Kitchener (at Queen St N and King St W) does not contain any dedicated parking spaces – it relies on surrounding public parking spaces and lots for its customers/visitors. The subject lands will be providing 56 dedicated non-residential parking spaces to support the LAUNCH use. Within Uptown and the surrounding neighbourhoods, there exists many residents who could visit and use the LAUNCH facility without use of a vehicle. If the facility provided too much parking, it would detract from the available alternative options, like public transit, and instead encourage more visitors to drive to the site. The provision of some parking, but not too much parking achieves the goal of supporting alternative transportation options while not burdening the public supply of parking or overloading surrounding residential streets.

Transportation Demand Management

Transportation Demand Management (TDM) is defined in the City of Waterloo Official Plan as:

“Specific policies and strategies that are designed to reduce automobile travel demand. Such policies and strategies can be developed by the public or private sectors.”

TDM measures strive to reduce the demand for roadways and motor vehicles by developing policies, programs and services that influence how, where, when and whether people travel in order to support a more efficient use of the transportation system. The overall objective of TDM strategies is to reduce the total number of automobile trips by influencing people to adopt more sustainable travel choices when it comes to types of travel.

The following outlines the potential TDM strategies that could apply to the proposed building on the subject lands:

- Unbundled Parking
 - The applicant intends to “unbundle” the parking space from the cost of a unit. In this regard, future residents will be able to decide whether or not to purchase a parking space
- Building Orientation that Supports Transit Service
 - As noted earlier, the lands are supported by multiple bus routes and are located within walking distance of two LRT Stations
 - The proposed development will facilitate on-site pedestrian access to transit through sidewalk connections to the surrounding sidewalk network on all three adjacent streets
 - The addition of 321 residential units in the Uptown, as well as the LAUNCH use will help support transit by providing additional users of the transit infrastructure
- Development integrated into the Surrounding Pedestrian and Cycling Network
 - The development is located less than 300 metres from the Spurline and Laurel Trails, which provide active transportation connections to Kitchener and throughout portions of Waterloo including the Uptown.

- Bike Storage
 - The proposed development includes secure bike storage/lockers on multiple levels for the future residents of the building
- Car-share parking space
 - The owner will investigate the provision of car share vehicle parking on the site. The availability of a “car share” vehicle would allow residents who would not normally need a vehicle for daily activities to be comfortable with the decision not to own a vehicle as access to a vehicle would be available.

Based on the foregoing, the proposed development is considered to be a TDM supportive form of development. The above noted TDM measures provide further justification for the requested parking reduction.

Other Comparable Developments

The city has considered and approved other development proposals with similar non-residential parking rates in the Uptown, some of which were approved through Cash-in-lieu of Parking Agreements through the City’s Uptown Community Improvement Plan (CIP), including an office development at 19 Regina St. The office building occupying 57 Erb St W includes 55 dedicated spaces for office uses resulting in a parking supply of 1.5 spaces / 100 m².

Parking Conclusion

In our opinion, the lands are well suited for a reduced parking requirement and such a reduction would be consistent with the policies in the Official Plan. The lands do not contain surface parking – all of the parking spaces are contained within a structure, part of which is underground and part of which is above ground. The lands have excellent access to alternative modes of transportation, including cycling, bus transit and ION. Furthermore, Uptown Waterloo is a very walkable community and the proposed development fronts onto three streets with entrances from each.

9.0 Shadow Study

The City requested an update to the Shadow Study as a result of the changes to the building design. Notably, the biggest change to the design was the reduction in height of the building closest to King St from 58 m to 46 m. The height of the Regina St building increased by less than 2 m. As a result, the shadow impacts remain either unchanged, where they are a result of the taller building, or reduced due to the reduction in height of the King St building. The City has established two guidelines for the consideration of Shadow Studies:

1. As a principle, at least 50% or more of any property should not be shaded for more than two interval times (a 4 hour equivalency); or
2. As a principle, at least 50% of any property should be in full sun for at least two interval times (a 4 hour equivalency).

Given the slender nature of the towers, the shadows move quickly across surrounding properties and the resulting impacts are consistent with the City's Site Plan Review Guidelines. A copy of the Shadow Study is included as an Appendix to the Planning Addendum Letter.

10.0 Summary of Revised Reports and Studies

Hydrogeological Study for Construction Dewatering (Chung & Vander Doelen)

The proposed development includes one level of underground parking and it is expected that the structure would be founded on some combination of spread footing and centralized raft slab foundation(s). None of the parking structure is to be located below the water table, although the foundation will be below the water table. As such, the foundation construction will require that the water table beneath the site be temporarily dewatered during construction.

- The William Street "Aquifer 2" wells are approximately 850 m away. The estimated radius of influence of the short-term construction dewatering is 130 m. As such, the short-term dewatering poses little risk for impact to the William Street wells or any reduction in water taking.
- Water taken from the construction dewatering will be treated prior to discharge into the municipal storm sewer system, in accordance with municipal standards.
- There are no anticipated geotechnical concerns with undertaking the dewatering

Pedestrian Wind Assessment (Novus Environmental)

From a wind perspective, the most significant change is the increase to the difference in height between Towers A and B (as a result of Tower A getting shorter) as well as the connection between the two towers within the indoor amenity space. The design changes will result in additional wind flowing down the westerly façade of Tower B on to the podium and into the landscape area on the south side of the podium. The Assessment concludes:

- Wind conditions in the landscaped space on the south side of the podium roof are expected to be comfortable for standing in the summer and leisurely walking in the winter.
- Similar conditions are expected for the north portion of the terrace

- On both terrace areas, landscaping, wind screens and/or other terrace furniture can be included to improve wind conditions to be comfortable for sitting in the summer.
- The remaining alterations to the design will have negligible influence on the overall wind conditions and therefore the conclusions of the October 31, 2017 Assessment are still applicable

Addendum Traffic Letter (Crozier Consulting Engineers)

The change in use on the site from “office” to LAUNCH (classified as a museum) has resulted in reductions to the trip generation. More specifically, the trips produced by the development are 69 and 139 trips fewer in the AM and PM peak hours respectively. The original TIS concluded that 2022 total traffic operations were similar to 2022 background conditions. The study intersections were projected to operate at Level of Service “C” or better, except for Erb St W and Regina St.

Given that the trip generation as a result of the development has decreased, and the previous development could be accommodated within the boundary road network, it is concluded that the revised development can also be accommodated within the boundary road network. The letter also assessed the operation of the Erb and Regina and concluded that the intersection will operate at the same level of service under existing and 2022 total traffic conditions.

In terms of stationary noise generated by the development, the assessment indicated that the sound emissions from the proposed buildings on the closest sensitive receptors will be below the MOECC minimum exclusionary sound level limits. Physical mitigation is not required.

Noise Feasibility Study (HGC Engineering)

The primary sources of noise impacting the site are road traffic on King St N and Bridgeport Rd E. The results of the study indicate that with suitable noise control measures integrated into the design of the buildings, it is feasible to achieve the indoor MOECC guideline sound levels. The recommended noise control measures include appropriate wall and window glazing assemblies, and air-conditioning of suites. Warning clauses will be required to warn future occupants of potentially audible transportation noise levels.

Functional Servicing Report (Stantec)

The Functional Servicing Report concludes that existing services are available within the King Street, Bridgeport Rd and Regina St road allowances. Upgrades are planned/underway by the Region for the King Street infrastructure, including upsizing the water and sanitary sewers and consolidating the existing storm sewers.

- Pressure reducing valves will not be required
- Downstream reaches all have residual capacity to accommodate the proposed development during peak flow
- Stormwater management quality control is obtained as the building occupies 77% of the site – an oil grit separator is not required.

- Additional grading, servicing and stormwater management details will be provided during detailed design.

11.0 Conclusion

We believe the above information satisfies the City's requirements regarding the review and consideration of the revised submission. The development achieves many of the City's goals and objectives outlined in the Official Plan and represents the type of development encouraged by the province through the Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe. The site is located in an area well served by alternative modes of transportation, provides sufficient parking and dramatically improves the streetscape along three key Uptown roads (King St, Bridgeport Rd and Regina St). The development will bring more residents and visitors into the Uptown to support local businesses and the introduction of LAUNCH has the potential to draw further positive attention to Waterloo as a leading creative city.

HIP Developments is excited to bring this landmark development to Uptown Waterloo and looks forward to scheduling a Formal Public Meeting in the near future. Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read 'DAA', with a long horizontal line extending to the right.

Dave Aston, MA, MCIP, RPP
Vice President

A handwritten signature in black ink, appearing to read 'Trevor Hawkins', written in a cursive style.

Trevor Hawkins, M.PL, MCIP, RPP
Senior Planner

Appendix A

Shadow Study