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1.0 Introduction

MacNaughton, Hermsen, Britton, Clarkson Planning Limited (“MHBC”) has been retained by Cook Homes Waterloo Limited (“the applicant”) to prepare a Planning Justification Report (the “Report”) in support of an Official Plan Amendment and Zoning By-law Amendment (“the applications”) for the development of lands municipally addressed as 30 Shaftsbury Drive, in the City of Kitchener (the “subject lands”).

The subject lands are located within the Stanley Park neighbourhood, in the Idlewood community, near the southwest corner of the intersection of Ottawa Street North and Lackner Boulevard, as shown on **Figure 1: Location Plan**. The subject lands are irregular in shape, with an area of approximately 0.847 hectares, and have frontage along Shaftsbury Drive, Oldfield Drive, and Ebydale Drive. The site currently contains a 2-storey evangelical church located on the west portion of the property, with associated surface parking to the east. The underutilized church and associated parking will be demolished to accommodate the proposed development.

The applicant is proposing a 6-storey residential apartment building consisting of 82 units, and a 2-storey townhouse block consisting of 6 units (“the proposed development”). The development will include common outdoor amenity areas and private amenity areas for residents.

The subject lands are designated *Institutional* on Map 3–Land Use in the City of Kitchener Official Plan and are zoned *Institutional (INS-1)* in the City of Kitchener Zoning By-law 2019-051. Implementation of the proposed development requires:

- An Official Plan Amendment to redesignate the subject lands from *Institutional* to *Medium Rise Residential* and;
- A Zoning By-law Amendment to rezone the subject lands from *Institutional (INS-1)* to *RES-6 Medium Rise Residential* with site-specific provisions.

This Planning Justification Report supports the planning applications and assesses the proposal in the context of the applicable planning framework. In support of the joint Official Plan and Zoning By-law Amendment application, this Planning Justification Report includes:

- An introduction and general description of the subject lands, surrounding land uses and existing conditions to provide an understanding of the locational context;
- An overview of the proposal and description of the proposed Official Plan Amendment and Zoning By-law Amendment;
- A review and summary of other technical reports prepared in support of the proposed planning application; and,
- A review of the existing policy framework in relation to the proposed amendments, including an assessment of consistency with the Provincial Planning Statement, conformity with the Region of Waterloo Official Plan, and conformity with the City of Kitchener Official Plan.

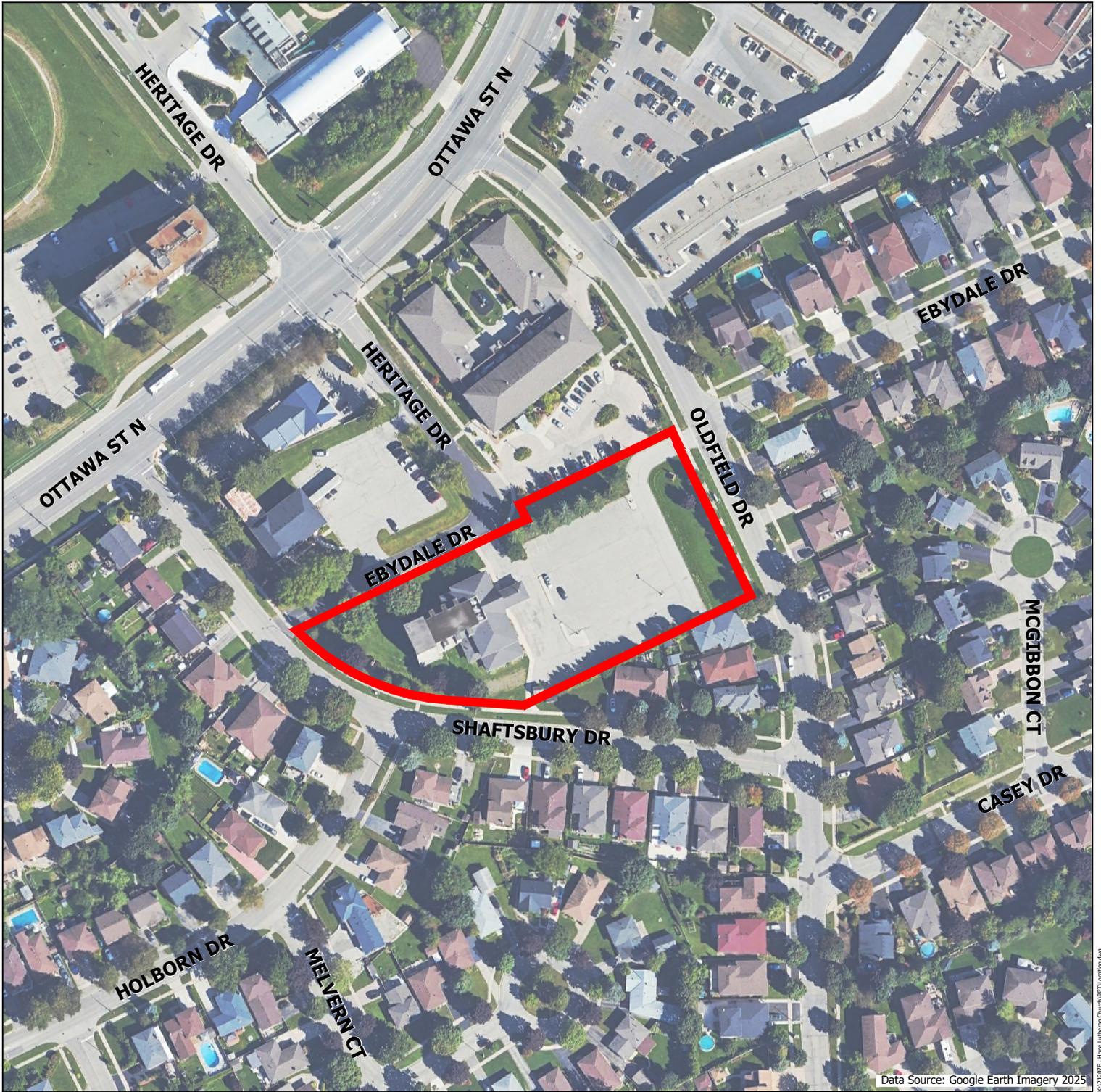


Figure 1 - Location Plan

 Subject Lands



1.1 Pre-Consultation and Submission Requirements

A Pre-consultation meeting was held for the development of the subject lands on January 23, 2025. Following the meeting, a Record of Consultation Document was issued, identifying the planning processes and technical studies required to permit the proposed development of the subject lands.

The required items for the Official Plan Amendment and Zoning By-law Amendment application have been completed and included as part of this submission, as follows:

- Planning Justification Report
- Urban Design Brief
- Functional Servicing and Water Distribution Report
- Sustainability Statement
- Scoped Transportation Impact Study
- Environmental Noise Study

The following additional items are also enclosed in the submission materials for the application:

- Concept Plan
- Draft Zoning By-law Amendment
- Draft Official Plan Amendment

A brief summary of the technical reports and plans is included in **Section 5.0** of this report. A copy of the Record of Consultation is included as **Appendix C** of this report.

2.0 Site Description and Surrounding Land Uses

The property is municipally addressed as 30 Shaftsbury Drive and is located along Shaftsbury Drive, Oldfield Drive, and Ebydale Drive, near the southwest corner of Ottawa Street North and Lackner Boulevard. The subject lands are located within the Built-Up Area of the City of Kitchener.

The subject lands are irregular in shape and have an area of approximately 0.847 hectares. The lands have approximately 90.0 metres of frontage along Shaftsbury Drive, 67.0 metres of frontage along Oldfield Drive, and approximately 93.0 metres of frontage along Ebydale Drive. The property currently contains a two-storey evangelical church on the western portion of the site, and associated surface parking to the east, with landscaped open space areas. The underutilized church and its associated uses are no longer feasible to operate in this location. As such, it will be demolished to accommodate the proposed development on the subject lands.

The subject lands are located in the Stanley Park neighbourhood, within the Idlewood community of Ward 2 of the City. The surrounding area is predominantly characterized as a residential community containing a range of residential built forms, institutional uses, commercial uses, parks and open space. Residential built forms in the surrounding community include single detached dwellings, semi-detached dwellings, townhouse dwellings and some mid-rise buildings. Several parks, recreation spaces, and trails are located within a 15-minute walking distance from the subject lands, including Casey Park, Rosenberg Park, Tecumseh Park, the Grand River Recreation Complex, and Idlewood Greenway. A commercial plaza containing a grocery store, pharmacy, and other retail uses is within a 5-minute walking distance from the subject lands.

The subject lands are well connected to key transportation and transit routes, providing access throughout the City and the Region. The subject lands are located near existing and planned Regional roads and Grand River Transit (GRT) routes, including routes 23, 205, 204, 1, 20, and 28.

- Route 23 (Idlewood) is accessible from Oldfield Drive, providing an east-west connection from Stanley Park to Fairway Station, running along Zeller Drive and Fairway Road.
- Route 205 (iXpress Ottawa) runs along Ottawa Street from the Sunrise Shopping Centre to the corner of Ottawa Street North and Lackner Boulevard, continuing as Route 204 (iXpress Highland-Victoria), which provides connecting services along Victoria Street to Central Station, Kitchener City Hall, Queen Station, and ending at The Boardwalk.
- Routes 23 and 205 connect to Routes 1 (Queen-River), 20 (Victoria-Frederick), and 28 (Franklin North) through connections from Stanley Park, offering connections to multiple ION light rail stations across Kitchener and Waterloo.

Municipal sidewalks along Shaftsbury Drive, Oldfield Drive, Ebydale Drive, together with bike lanes and sidewalks along Ottawa Street North, offer convenient and safe active transportation connections to daily needs and amenities and other areas of the City.

A context plan is included in *Figure 2: Context Map*, and existing land uses can be seen in *Figure 3: Existing Land Uses*. The following provides a review of surrounding land uses:

NORTH:

A mix of residential, institutional and commercial uses. Directly north of the subject lands is the Anselma House (a two-storey women's shelter), KW Musical Productions, and Ottawa Heritage Dental, both single-storey institutional and commercial uses. Further north is the Grand River Recreation Complex, which includes Rosenberg Park, the Heritage Greens Lawn Bowling Club, various playgrounds, and sports fields. Grand River Collegiate Institute and the Grand River Stanley Park Library are also located to the north. A seven-storey apartment building is situated at the northeast corner of Ottawa Street North and Heritage Drive. A small commercial node is located approximately 200 metres north along Ottawa Street N, offering a range of services, followed by residential areas beyond Lackner Boulevard. This residential area is characterized by low-rise single detached homes, townhomes, and apartment buildings ranging from 1-9 storeys in height.

EAST:

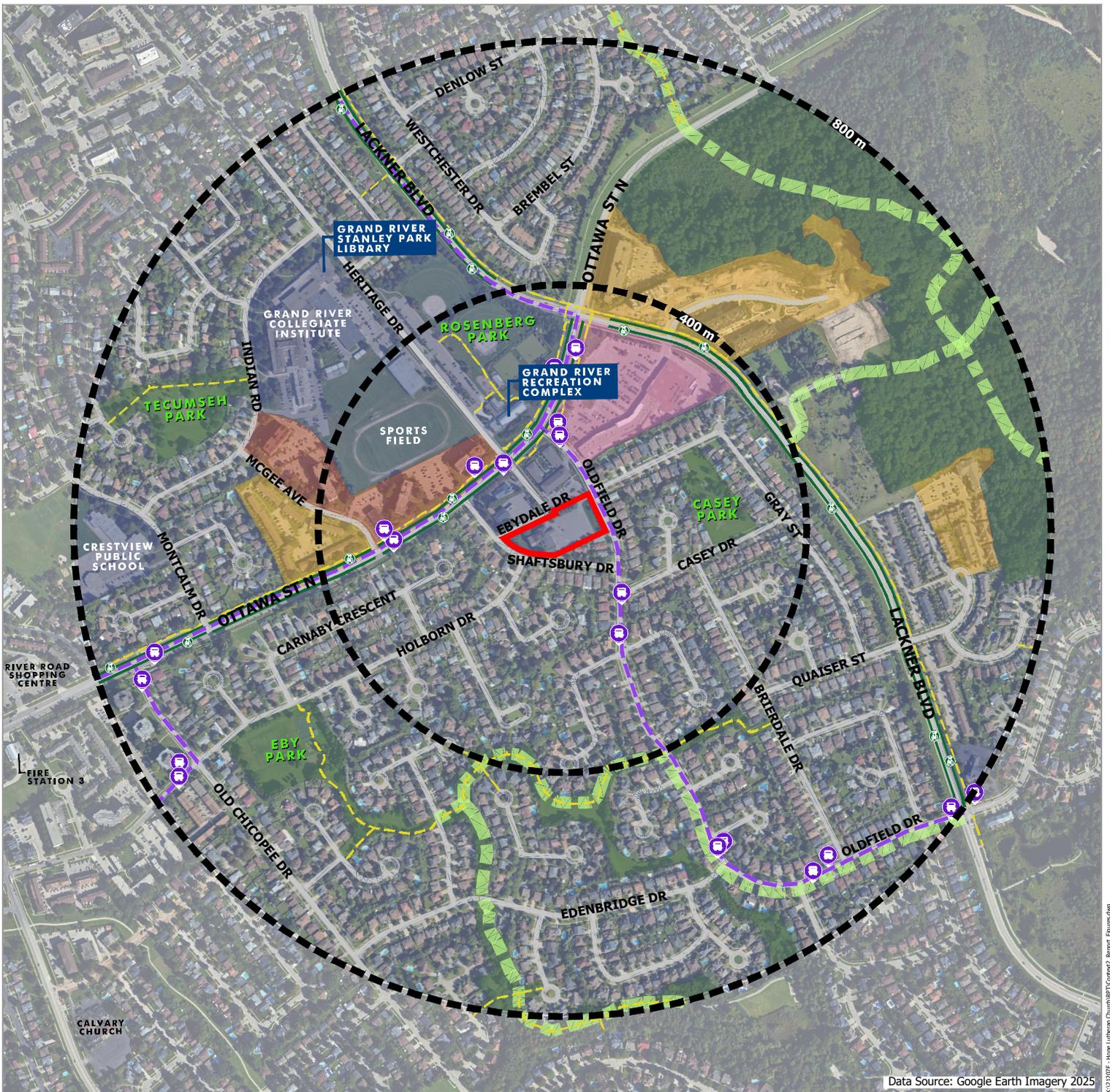
Low-rise residential neighbourhood. Dwellings are primarily single detached with heights ranging from one to two storeys. Beyond the low-rise neighbourhood and Lackner Boulevard is the Core Natural Heritage Feature of Natchez Woods. This system continues to the Grand River and the Municipal Boundary.

SOUTH:

Low-rise residential neighbourhood comprised of single detached one and two-storey dwellings. Further south of the subject lands is Idlewood Greenway and Springmount Park, consisting of open space and a playground. Both are located within walking distance and are connected by a trail network.

WEST:

A range of residential uses, including single-detached dwellings, semi-detached dwellings, townhomes, walk-up apartments, and apartment buildings. Building heights range from one to eight storeys in height. Several semi-detached dwellings are located directly adjacent to the subject lands. Further northwest of the site along Ottawa Street N are several apartment buildings ranging from three to eight storeys in height, as well as several townhouse blocks. Also, to the west is Eby Park, located 550 metres from the subject lands, and Crestview Public School and its associated school field, located 850 metres from the subject lands.

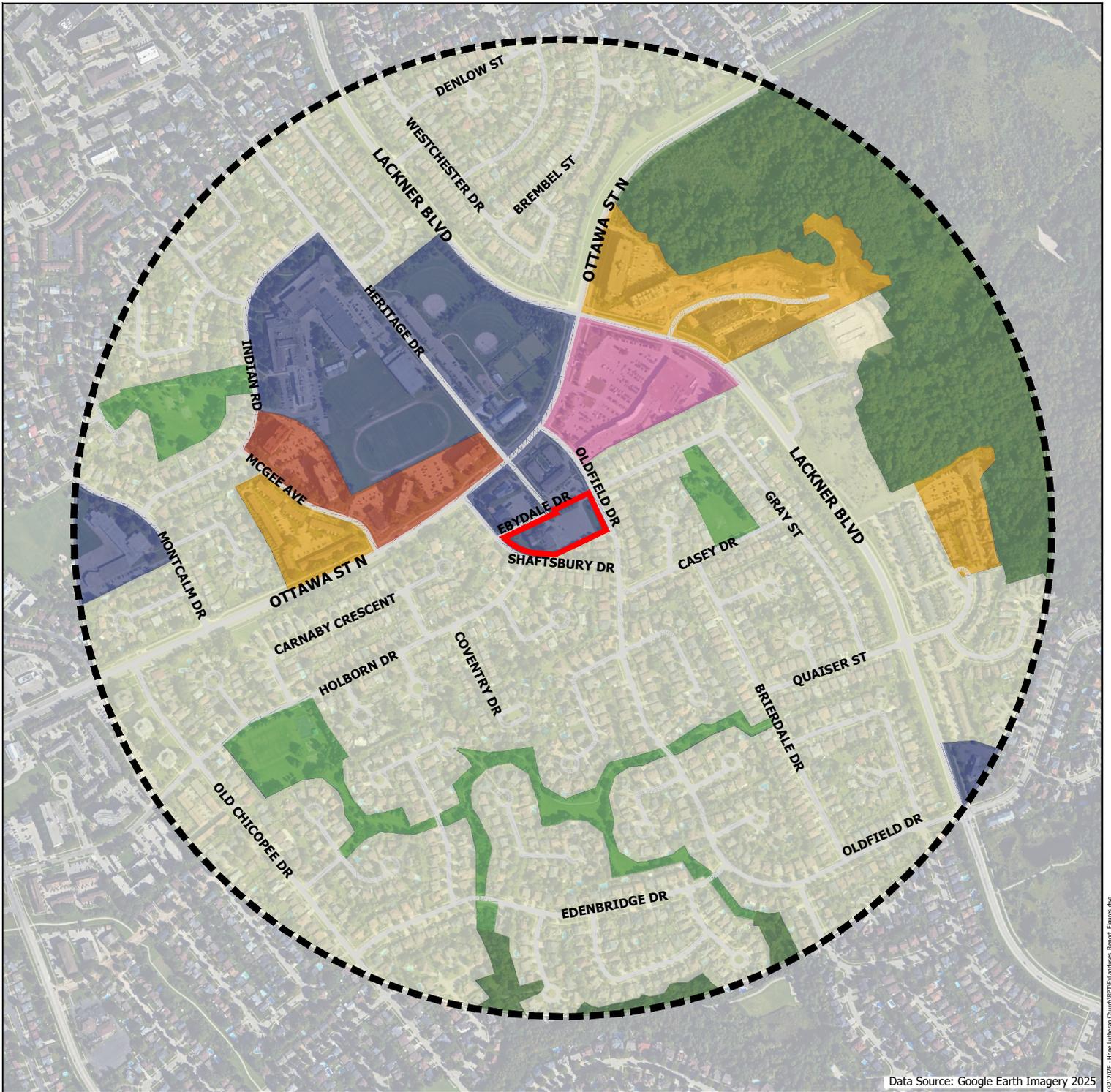


Data Source: Google Earth Imagery 2025

Figure 2 - Context

- Subject Lands
- Medium Rise Residential
- High Rise Residential
- Institutional
- Commercial
- Park/ Open Space
- Secondary Multi-Use Pathway/Connection
- Multi-use Pathway
- Bike Lane
- Grand River Transit (GRT) Route
- Bus Stop
- 400m Distance (5 min. Walk)
- 800m Distance (10 min. Walk)





Data Source: Google Earth Imagery 2025

Figure 3 - Existing Land Uses



3.0 Development Vision

3.1 Proposed Development

The overall vision for the subject lands is to establish a medium-density residential development comprised of a six-storey apartment building block with 82 units and a two-storey townhouse block with 6 units, together with associated vehicular access, parking and amenity areas. A proposed concept plan is included as *Figure 4: Concept Plan*.

Residential Development

The proposed development comprises a total of 88 residential units distributed across two blocks.

- Block A will contain the six-storey residential apartment building with 82 units, centrally located on the site, with setbacks of approximately 14.8 metres from Shaftsbury Drive and 14 metres from Ebydale Drive.
- Block B will contain a two-storey townhouse block with 6 units, located along the eastern portion of the site and oriented towards Oldfield Drive.

The proposed development will achieve an overall residential density of 104 units per hectare. The apartment building will be designed to frame the street edges, while the townhouse block provides a compatible transition in massing and scale to adjacent low-rise residential dwellings.

Amenities

A common outdoor amenity area is proposed along the western portion of the site, situated at the corner of Shaftsbury Drive and Ebydale Drive. The space is proposed to include landscaping and open space for recreational activities and passive recreation. Private outdoor amenity areas will be provided for units containing outdoor patios in the residential apartment building. Each townhouse unit will include a rear-yard private amenity area.

Access and Parking

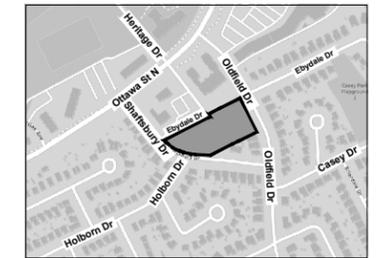
The proposed development includes 101 vehicle parking spaces and 47 bicycle parking spaces. Vehicular parking is proposed at a rate of one (1) resident parking space per unit and 0.15 visitor parking spaces per unit. Of the total parking, 82 vehicle parking spaces and 13 visitor parking spaces (including 4 barrier-free parking spaces) will be provided for the apartment building development. All parking will be provided as surface parking, located primarily in the centre and side yards of the site to provide appropriate buffering between surrounding uses, the building footprint, and to screen from the streetline.

CONCEPT PLAN

30 Shaftsbury Drive, City of Kitchener, Ontario

21207F

KEY PLAN



Source: ESRI

LEGEND

Subject Lands

SITE STATISTICS

Zoning By-law Medium Rise Residential Six Zone (RES-6)		
Regulation	Required	Provided
Multiple Dwelling - Apartment		
Total Units	-	82 Units
Lot Area (min)	495 m ²	7,172 m ² (0.717 ha)
Lot Width (min)	30.0 m	22.0 m
Front Yard and Exterior Yard (min)	3.0 m	14.1 m
Interior Side Yard (min)	4.5 m	28.8 m
Rear Yard (min)	7.5 m	14.8 m
Landscaped Open Space (min)	20 %	42 %
Floor Space Ratio (min-max)	0.6-2.0	0.9
Building Height (min-max)	11.0 m-25.0 m	TBD
Number of Storeys (max)	8	6
Parking Spaces (min)	1.0/unit (82)	1.0/unit (82)
Visitor Parking Spaces (min)	0.1/unit (8)	0.15/unit (13)
Barrier-Free Accessible Parking	4% (4 Spaces)	4 Spaces

Zoning By-law Low Rise Residential Five Zone (RES-5)		
Street Townhouse		
Total Units	-	6 Units
Lot Area (min)	135 m ²	1,298 m ² (0.130 ha) Unit 1: 250.1 m ² Unit 2-5: 174.4 m ² /unit Unit 6: 350.3 m ²
Lot Width - Internal Unit (min)	5.5 m	6.0 m
Lot Width - External Unit (min)	9.5 m	N/A
Corner Lot Width (min)	11.5 m	N/A
Front Yard and Exterior Yard (min)	4.5 m	5.7 m and 6 m to Garage
Interior Side Yard (min)	2.5 m	2.5 m
Rear Yard (min)	7.5 m	6.0 m
Lot Coverage (max)	55 %	49 %
Building Height (max)	11.0 m	TBD
Number of Storeys (max)	3	2
Parking Spaces (min)	1.0/unit (6)	1.0/unit (6)

Area Summary:	Apartment	Street Townhouse
Building Coverage	1,113 m ² 16%	636 m ² 49%
Landscaped Area	3,012 m ² 42%	548 m ² 42%
Asphalt Area	3,047 m ² 42%	114 m ² 9%
Total	7,172 m ² 100%	1,298 m ² 100%

NOTES

- All dimensions are in metres unless otherwise shown.
- Contains information licensed under the Open Government Licence - Ontario.
- City of Kitchener Imagery, 2022
- FC - Flush Curb

DATE: November 3, 2025



SCALE: 1:600

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Pedestrian pathways will connect the building entrances, parking, and amenity areas to the existing sidewalk network on Oldfield Drive and Ebydale Drive, providing safe and appropriate pedestrian circulation throughout the site.

3.2 Official Plan Amendment Application

The subject lands are within a *Community Node* and are designated as *Institutional* in the City of Kitchener Official Plan. To permit the proposed residential development, the subject lands will require an Official Plan Amendment to redesignate the subject lands from *Institutional* to *Medium Rise Residential*. The Official Plan Amendment is also proposed to permit the use of street-facing townhouses in the *Medium Rise Residential* designation.

A full analysis of the proposed Official Plan Amendment is included in **Section 4.3** of this Report, and a draft Official Plan Amendment is included as **Appendix A**.

3.3 Zoning By-law Amendment Application

The subject lands are zoned *Neighbourhood Institutional ("INS-1")* in the City of Kitchener Zoning By-law 2019-051. Residential uses are not permitted. To permit the proposed residential development, the subject lands will require a Zoning By-law Amendment to rezone the subject lands from *Neighbourhood Institutional (INS-1)* to *Medium Rise Residential Six Zone ("RES-6")* in the City of Kitchener Zoning By-law 2019-051. The following site-specific provisions are hereby requested as part of this application to facilitate the development as proposed:

- To permit the use of street-facing townhouse dwellings in the RES-6 zone, whereas Section 7.2 of the Zoning By-law does not permit street-facing townhouse dwellings.
- To permit a minimum rear yard setback of 6.0 metres for the street-facing townhouse dwellings, whereas Section 7.3 of the Zoning By-law requires a minimum rear yard setback of 7.5 metres.
- To permit a minimum lot width of 22.0 metres for the residential apartment building, whereas Section 7.3 of the Zoning By-law requires a minimum lot width of 30.0 metres.

A full analysis of the proposed Zoning By-law Amendment is included in **Section 4.4** of this Report, and a draft Zoning By-law Amendment is included as **Appendix B**.

4.0 Policy Analysis

4.1 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024, came into effect on October 20, 2024, replacing the previous Provincial Policy Statement, 2020. The PPS applies to all decisions that affect planning matters made on or after the implementation date.

The PPS provides overall policy direction on matters of provincial interest related to land use planning and development, and sets the policy foundation for regulating the development and use of land province-wide. Generally, Chapter 1 of the PPS details that this policy instrument provides a vision for land use planning in Ontario that: prioritizes growth in urban and rural settlements; prioritizes compact and transit-supportive design, where locally appropriate; and optimizes investments in infrastructure and public service facilities to support convenient access to housing, quality employment, services and recreation. Further, with respect to housing, the vision set out in Chapter 1 prescribes that every community is to build homes responding to changing market needs and local demand.

The role of the PPS is stated in this Chapter:

The Provincial Planning Statement provides policy direction on matters of provincial interest related to land use planning and development. As a key part of Ontario's policy-led planning system, the Provincial Planning Statement sets the policy foundation for regulating the development and use of land province-wide ...

The proposed development plan has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Chapter 2 (Building Homes, Sustaining Strong and Competitive Communities), Chapter 3 (Infrastructure and Facilities), and Chapter 4 (Wise Use and Management of Resources) are particularly relevant to this proposal.

4.1.1 Building Homes, Sustaining Strong and Competitive Communities

Policy 2.1.6 states that planning authorities should support the achievement of complete communities by way of several measures. including:

a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated childcare facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

Policy 2.2.1 requires planning authorities to provide for an appropriate range of housing options and densities to meet the projected needs of current and future residents by way of a series of policy directions, including:

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and well being requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Policy 2.3.1 directs that settlement areas shall be the focus of growth and development areas, with strategic growth areas and major transit station areas being focal points. Policy 2.3.1.2 further prescribes that land use patterns within settlement areas are to be based on a density and mix of uses that achieve several objectives, including:

a) efficiently use land and resources;

b) optimize existing and planned infrastructure and public service facilities;

c) support active transportation;

d) are transit-supportive, as appropriate;

Additionally, direction regarding growth and development is provided in Policy 2.3.1.3, which requires planning authorities to support general intensification and redevelopment to encourage complete communities. This is to include planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.

Policy 2.9 addresses energy conservation, air quality, and climate change, requiring planning authorities to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through a number of initiatives, including the following, with specific applicability to this project:

a) support the achievement of compact, transit-supportive, and complete communities;

d) promote green infrastructure, low-impact development, and active transportation, protect the environment and improve air quality;

Based on these policies, the proposed development and associated amendment applications are consistent with the direction set out in the referenced policies of Chapter 2, as they:

- Utilize existing land and municipal servicing resources efficiently, supported by an established road transportation system, active transportation network, and transit services. The proposal also supports a compact land use pattern that is compatible with, and complementary to, the local development context.

- Contributes to a complete community by supplying a new housing option for the community that is appropriate for the local development setting and would positively contribute to the achievement of a complete community within the surrounding neighbourhood. The proposal also supports a compact land use pattern and design elements to support a mid-rise that is compatible with and complementary to the local development context.
- Supports the City in accommodating its forecasted population growth and achieving its projected housing requirements.
- Facilitate the intensification of lands within a settlement area served by public transit, resulting in an appropriate density that supports public investment in transit and efficiently utilizes existing services and servicing capacity (as discussed in relation to Chapter 3 of the PPS).
- Enhances connections to the active transportation network near the site through the surrounding sidewalk network to promote community connectivity and help reduce the generation of greenhouse gas emissions.
- Leverage existing public service facilities provided in the local community to accommodate the needs of residents of the proposed development.

4.1.2 Infrastructure and Facilities

Policy 3.1.1 requires infrastructure and public service facilities to be provided in an efficient manner, while accommodating projected needs and being coordinated and integrated with land use planning and growth management.

Additionally, Policy 3.1.2 a) sets out that prior to the consideration of developing new infrastructure and public service facilities, the use of existing infrastructure and public service facilities should be optimized.

Section 3.2.2 addresses transportation systems and states: "Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible."

Policy 3.6.1 prescribes policies guiding planning for sewage and water services, including the following, with particular relevance to this project:

- c) promote water and energy conservation and efficiency;*
- d) integrate servicing and land use considerations at all stages of the planning process;*

Policy 3.9.1 defines several considerations for promoting healthy, active and inclusive communities, including the following policies with relevance to the proposed development:

- Policy a) encourages the planning of public streets, spaces and facilities, ...to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity; and,
- Policy b) supports, Planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources.

The proposed development is consistent with the referenced policies of Chapter 3 of the PPS. The proposal supports intensive, compact development that efficiently utilizes municipal water, stormwater, transportation, active transportation, and transit infrastructure, and integrates outdoor amenity space. Our opinion is informed by the findings of technical analyses completed in conjunction with the Amendments and addressing transportation and site servicing considerations. Study findings are briefly summarized below and in Section 5.0 of this Report:

- In relation to Policy 3.2, as discussed in Section 5.8 of this Report, Salvini Consulting completed a scoped Transportation Impact Study in support of the proposed development, which confirms that the development can be accommodated within the existing road network.
- Respecting Policy 3.6.1, servicing and water distribution reviews have been completed to confirm that the development can proceed in a cost-effective manner and the necessary servicing infrastructure is available to meet projected needs. Walterfedy prepared a Functional Servicing Report which concludes that the proposed development can be adequately serviced by the existing municipal water, sanitary, and stormwater systems, consistent with Policy 3.6.1 objectives.

With regard to transportation systems (Section 3.2), the subject lands are serviced by existing Grand River Transit routes, including Routes 23, 205, 204, 1, 20, and 28, which are all within a one to three-minute walk from the subject lands. The bus system provides connectivity throughout the City and to regional transportation facilities, including the VIA Rail Station, GO Transit, and stops throughout the ION light rail network.

The proximity of the site to transit, amenities, service/retail commercial uses, institutional uses, recreation facilities and parkland/open space would help future residents minimize the lengths and frequencies of vehicle trips.

With respect to Policy 3.9, the proposed development would promote safety through glazed elements that overlook the public realm, providing eyes on the street, and through outdoor lighting. The buildings are also outside of natural hazard areas.

The subject lands are well-connected to the surrounding active transportation network. Bicycle parking is provided to residents.

4.1.3 Wise Use and Management of Resources

Chapter 4 provides policy direction for natural heritage, water, agriculture, minerals and petroleum, mineral aggregate resources, cultural heritage and archeology. Development of this project would help to broaden housing choice, and the intensity of this development would continue to support existing transit services and future transit investments. The subject lands do not contain any known mineral or petroleum resources, mineral aggregate resources, natural heritage or built heritage / cultural heritage resources.

It is our opinion that the Official Plan and Zoning By-law Amendment applications are consistent with the Provincial Planning Statement.

4.2 Region of Waterloo Official Plan

The Region of Waterloo Official Plan (“Regional Official Plan” or “ROP”) was adopted by the Council of the Region of Waterloo on June 16, 2009. The ROP was then approved by the Ministry of Municipal Affairs and Housing on December 22, 2010. Following subsequent appeals was ultimately approved with modifications by the Ontario Municipal Board on July 14, 2015, stating that the ROP was in force and effect as of June 18, 2015.

As a result of Provincial Bill 23, the Region of Waterloo’s Planning Authority is transferred to the City of Kitchener as of January 1, 2025. While the Region of Waterloo has transitioned to a commenting agency rather than an approval authority relative to Official Plan Amendments in Kitchener, the ROP remains in force and effect until the Regional Official Plan is integrated into the City of Kitchener Official Plan, and as such, this Report reviews the applicable policies of the ROP.

4.2.1 Where and How to Grow

Urban Areas

The subject lands are within the Delineated Built-Up Area on Map 3A of the Regional Official Plan, as shown in *Figure 5: Region of Waterloo OP Map 3A Urban Area*. Lands within the Built-Up Area are intended to accommodate a greater number of new developments to make better use of land, existing physical infrastructure, and services. This results in a more compact, vibrant, and complete community, with a range and mix of uses. Development in the built-up area is intended to occur primarily in the form of intensification and redevelopment. The proposed development would contribute to the growth of urban development in the existing Built-Up Area.

Within the Urban Area, most of the region’s future growth will be directed to Urban Growth Centres, Major Transit Station Areas, Reurbanization Corridors, Major Local Nodes, and Urban Designated Greenfield Areas. Generally, these areas should create a more compact urban form.

Section 2.A of the ROP states that a population of 409,200 is anticipated in Kitchener by the year 2051. Approximately 90% of the Region’s forecasted growth is expected to be directed into Urban Areas. Section 2.B of the ROP indicates that over 60% of the Region’s new residential growth will occur within the Delineated Built-Up Area of cities and townships through intensification. As previously stated, the subject lands are located within the Delineated Built-Up Area, and the proposed redevelopment will contribute towards the achievement of new residential growth and the Region’s intensification target.

Policy 2.C.2.2 sets out general policies to guide development within the Urban Area. Generally, development within the Urban Area is to be planned and developed in a manner that:

- implements the Regional Urban System;
- Advances the community’s transition into an energy-efficient, resilient, low-carbon community;
- Is municipally serviced;
- Protects the natural environment;
- Provides a diverse range and mix of housing options;
- Conserves cultural heritage resources;



Figure 5 - Region of Waterloo Official Plan Map 3A Urban Area

- | | |
|--|---|
|  Subject Lands |  Urban Area Boundary |
| Urban Area |  Reurbanization Corridors ** |
|  Built-Up Area* |  Major Transit Station Areas ** |
|  Urban Designated Greenfield Areas |  Central Transit Corridor |
|  Prime Industrial/Strategic Reserve (Served) |  Environmental Assessment Study Area |
|  Urban Growth Centres |  Planned Highway 7 |



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- Avoids development and land use patterns that may pose a risk to public health, safety and the environment;
- Improves accessibility for persons of all ages and abilities;
- Ensures the development of high-quality urban form;
- Considers the well-being and belonging of all children and youth; and,
- Expands residents' access to a range of transportation options, public service facilities, urban greenlands and open spaces, and affordable food options in neighbourhoods.

Section 2.D sets out general development policies for the Urban Area. Development in the Urban Area is to be planned and developed in a manner that:

- supports the Planned Community Structure;
- Is serviced by a municipal drinking-water supply system and a municipal wastewater system;
- Contributes to the creation of complete communities with development patterns, densities, and a mix of land uses that support walking, cycling and the use of transit;
- Protects the natural environment;
- Conserves cultural heritage resources; and,
- Respects the scale, physical character and context of established neighbourhoods where re-urbanization is planned to occur.

Policy 2.D.5 speaks to general intensification policies for strategic growth areas, which seek to support 15-minute communities and permit missing-middle housing.

Policy 2.D.6 of the ROP outlines transit-supportive development policies that include the following objectives:

- Create a multi-modal street pattern that prioritizes active transportation modes and transit-use; support compact built-forms that support transit use;
- Provide an appropriate mix of land uses to meet peoples' daily needs;
- Promote medium and higher-density development closer to transit stops;
- Support a high-quality public realm;
- Provide access from various transportation modes to transit facilities.

Section 2.F establishes the policy framework to achieve the objectives of meeting or exceeding minimum intensification targets to make better use of land and infrastructure and support the gradual transition of existing neighbourhoods into 15-minute neighbourhoods. Area municipalities are to meet or exceed the minimum intensification targets set out in Table 3 of Section 2.F, which establishes a minimum intensification of 60% and a total minimum unit count of 31,660 units, is to be achieved by the City of Kitchener between 2022 and 2051. Policy 2.F.2 indicates that intensification occurring within the Delineated Built-Up Area will be planned and developed in a manner which will:

- a) Further refine and implement the role and function of each of the area municipality's strategic growth areas consistent with the urban system policies described in Section 2.B, to support achievement of the intensification target and recognize them as a key focus for new growth development;
- b) Identify the appropriate type and scale of development in each of the area municipality's strategic growth areas and transition of built form to adjacent areas;

- c) Enable intensification more broadly throughout the area municipality's delineated built-up area through gentle density and other missing middle housing options;
- d) Ensure lands are zoned and development is designed in a manner that supports the achievement of 15-minute neighbourhoods;
- e) Support the gradual transition of existing neighbourhoods into 15-minute neighbourhoods that are denser, more energy efficient, and liveable;
- f) Guide and prioritize planning and investment in efficient and modern infrastructure and public service facilities that will support intensification; and
- g) Be implemented through the area municipality's official plan policies, designations, updated zoning by-laws, secondary plans, and other supporting documents.

The proposed applications and development concept satisfy the development policies of Section 2 of the ROP, as follows:

- The proposed applications will assist the Region in achieving and/or exceeding the minimum intensification target and will result in the redevelopment of lands located within the Urban Area, in an area planned for intensification and a mix of land uses;
- The proposed applications support the use of transit, as a GRT bus stop is located directly in front of the subject lands, with additional bus routes and stops being located within walking distance from the subject lands;
- The proposed applications provide an opportunity for compatible intensification at a transit supportive density in proximity to existing transit services, encouraging multi-modal transportation, including transit and active transportation use;
- The proposed applications support the establishment of a complete community, being well served by public transit routes, proximate to a full range of daily needs (including a broad range of commercial uses, nearby schools, and parks/open spaces), and providing on-site passive amenity space for residents;
- The development concept provides a range of dwelling unit types and sizes, contributing towards housing diversity within the community, and;
- The development concept provides opportunity for a compact built form that contributes to a pedestrian-friendly environment by establishing pedestrian connectivity through the site and by connection to existing municipal sidewalks;

In summary, the subject lands are located within the Urban Area and Delineated Built-Up Area, have good access to a range of uses and are well connected to physical infrastructure, community infrastructure, various transit routes and stops, and the broader road network.

4.2.2 Liveability in Waterloo Region

Section 3 of the ROP provides direction for creating vibrant urban and rural places. The policy encourages the provision of a range of housing alternatives, walking, cycling, and transit.

Section 3.A.2 directs area municipalities to plan and provide for an appropriate range of housing in terms of form, tenure, density and affordability to satisfy the various physical, social and economic and personal support needs of current and future residents. While the proposed applications and development concept do not contemplate affordable housing, it offers multiple unit sizes and types within the site and supports housing diversity on lands that are walkable to a range of non-residential

uses, including institutional, commercial and parks and open spaces, which meet daily and weekly needs of future residents and provide good access to a range of community amenities.

Section 3.D of the ROP includes a list of policies to support energy conservation. The proposed applications are consistent with Policy 3.D.1, as follows:

- The proposed development facilitates a compact, residential development, containing apartment and townhouse units;
- The proposed development is part of a larger mix of uses in the area;
- The proposed development promotes walking, cycling and the use of transit;
- The proposed development will utilize existing infrastructure to service the property.

4.2.3 Addressing Waterloo Region's Infrastructure Needs

Section 5 of the ROP provides direction on infrastructure planning, usage and management, and seeks to optimize existing infrastructure, accommodate forecast growth, and promote sustainability and a healthy population.

The proposed applications provide a transit-supportive density, supporting the use of existing and planned transit services and active transportation infrastructure available within the area. The subject lands are also serviced by existing municipal services. The proposed development makes efficient use of existing infrastructure and supports the Region's vision for promoting sustainable development.

4.2.4 Source Water Protection

The ROP includes policies related to the protection and conservation of the Region's drinking water resources, including Wellhead Protection Sensitivity Areas (WPSA's), which are classified from 1-8. The classifications allow for varying degrees of management relative to the vulnerability of the underlying groundwater, the importance of the well to the capacity of the Region's municipal drinking water supply, as well as the length of time groundwater within a WPSA takes to reach the municipal drinking water supply well. Map 6a of the ROP (*Figure 6: Region of Waterloo OP Map 6a Urban Area Source Water Protection Areas*) confirms the subject lands are within Wellhead Protection Sensitivity Area 8. WPSA 8 delineates the area outside of the peak 10-year time of travel to the limit of the total land area contributing water to a municipal drinking water supply well. The ROP acknowledges that the quantity and quality of drinking water are affected by land uses and that not all land uses pose the same level of risk to drinking water. The ROP identifies four categories of land uses based on the associated level of risk. The residential land use that is proposed is considered to be a relatively low risk within WPSA 8 and conforms to the wellhead protection policies of the ROP.

4.2.5 ROP Summary

In summary, the proposed Official Plan Amendment and Zoning By-law Amendment conform to the Region of Waterloo Official Plan and represent the efficient use of land, resources and infrastructure.

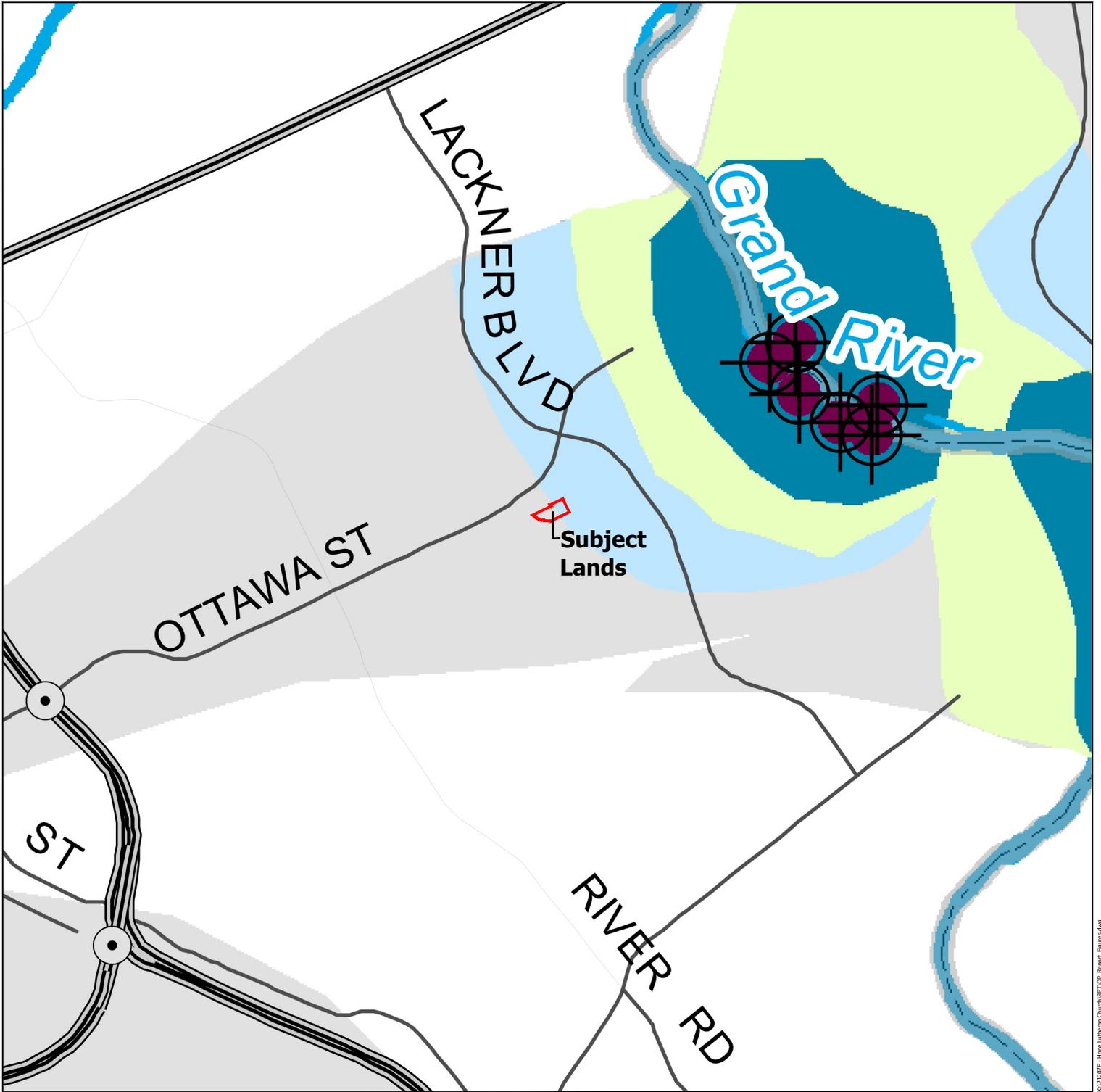


Figure 6 - Region of Waterloo Official Plan Map 6A Urban Area Source Water Protection Areas

- Subject Lands
- Municipal Wellhead**
- Municipal Wellheads
- Groundwater Under Direct Influence (GUDI)
- Wellhead Protection Areas**
- Wellhead Protection Sensitivity Area-1
- Wellhead Protection Sensitivity Area-2
- Wellhead Protection Sensitivity Area-3
- Wellhead Protection Sensitivity Area-4
- Wellhead Protection Sensitivity Area-5
- Wellhead Protection Sensitivity Area-6
- Wellhead Protection Sensitivity Area-7
- Wellhead Protection Sensitivity Area-8



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4.3 City of Kitchener Official Plan

The City of Kitchener Official Plan (“City’s OP” or “OP”) was approved by the Region of Waterloo on November 19, 2014 and by the Local Planning Appeal Tribunal on March 21, 2019, and July 16, 2019. The OP implements provincial and regional planning policies within the local context and provides additional details to guide development. As previously noted, the City’s Official Plan has not yet been updated to incorporate the Region of Waterloo Official Plan to implement Bill 23.

4.3.1 Urban Structure

The subject property is identified as being within a *Community Node Area* on Map 2 (Urban Structure) of the City’s OP (**Figure 7: City of Kitchener Official Plan Map 2 Urban Structure**). Section 3.C.2.30-33 of the City’s OP provides policy direction for Community Nodes, which are planned to accommodate commercial uses with a mix of residential and institutional uses necessary to support and complete surrounding residential communities.

Community Nodes are located along existing and/or planned transit corridors and are intended to intensify and be transit-supportive, cycling, and pedestrian-friendly. Permitted uses within Community Nodes include medium-rise residential, high-rise residential, commercial, mixed-use, institutional, and open space, depending on the context and the range of uses deemed appropriate for achieving the planning function of the *Community Node*.

The Official Plan, therefore, permits medium residential development within Community Nodes, provided it contributes to the planned function of a complete and transit-supportive community. The proposed development aligns with the planned function and conforms to policy direction for Community Nodes as follows:

- The subject lands location adjacent to existing transportation corridors supports the Nodes objective of promoting transit-supportive residential intensification;
- The proposed development represents a built form that appropriately balances intensification with compatibility with the surrounding context;
- The townhouse units and the setback of the apartment building from the street provide a pedestrian-scaled built form at the street line, contributing to an active and visually engaging streetscape;
- The proposed development incorporates setbacks and landscaping to ensure a compatible transition in height and massing to adjacent lower-density residential and commercial uses;
- The site design emphasizes pedestrian comfort, connectivity, and accessibility, supporting walkability within the Node; and
- The proposed development contributes to a diverse housing mix within the Community Node, aligning with the Official Plan’s objective of providing a range of housing options close to transit and amenities.

The proposed development is permitted within Community Nodes and supports the planned function of the Community Nodes as a complete, transit-supportive development.

4.3.2 Land Use Policies for a Complete & Healthy Kitchener: Institutional

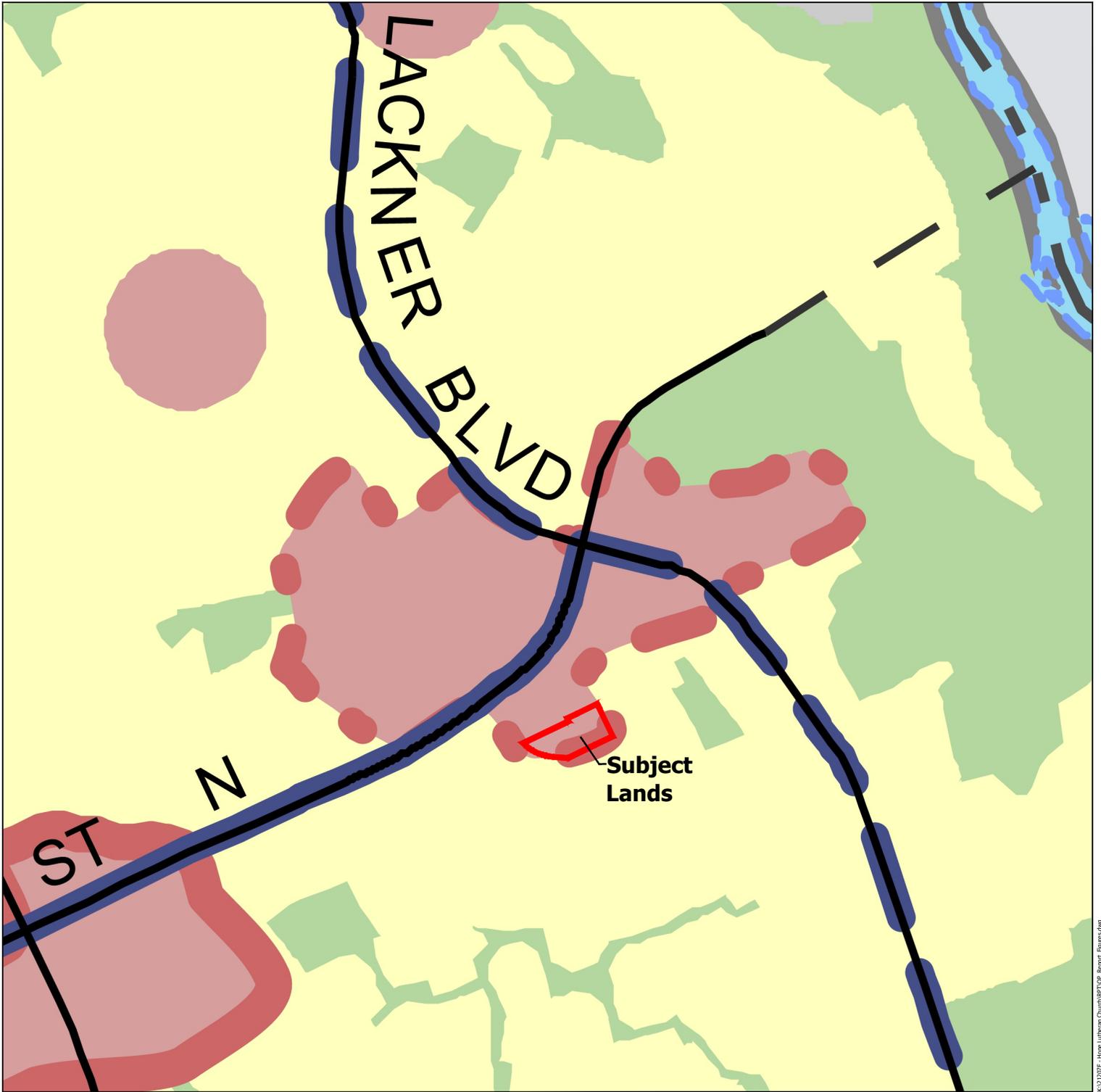


Figure 7 - City of Kitchener Official Plan Map 2 Urban Structure

- Subject Lands
- City Node
- Community Node
- Neighbourhood Node
- Community Area
- Green Areas
- Existing Transit Corridor
- Planned Transit Corridor



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Section 15.D.7 of the City’s OP sets out policies for lands designated *Institutional* on Map 3 (Land Use) (**Figure 8: City of Kitchener Official Plan Map 3 Land Use**). As identified, the subject lands are designated *Institutional*, which is intended for institutional uses that are of a community or regional nature, such as secondary and post-secondary educational facilities, long-term care facilities and social, cultural and administrative facilities. The institutional land designation also includes small-scale institutional uses compatible with surrounding uses such as public and private elementary schools, libraries, day care centres, and places of worship.

The proposed Official Plan Amendment is required to redesignate the lands from *Institutional* to *Residential*. Institutional lands are designated in the Official Plan to provide opportunities for institutional land uses. Specifically, policy 15.D.7.3 states that the City may designate lands intended for institutional uses as *Institutional* in order to protect these lands for institutional uses and ensure their continued contribution to supporting a complete community. The subject lands contain an existing institutional use that is underutilized and underfunded. It is no longer feasible to operate the existing church in this location. As such, it is proposed that the existing institutional uses will be demolished and replaced with the proposed residential development, which will maximize the site.

Policy 15.D.7.4 City of Kitchener Official Plan identifies a series of tests for properties to be redesignated from *Institutional* to *Residential*. These policies have been evaluated below:

Test 1: The use of the site for a suitable alternative institutional purpose;

The subject lands are of an irregular shape, with an area of approximately 0.85 hectares, which is a relatively small, institutionally designated parcel. The shape and size of the site are limiting factors in the consideration of the site for other institutional use. The Waterloo Region District School Board (WRDSB) identifies the following minimum criteria for new school sites:

Feature	Junior or Senior Elementary (JK-8 or Other)	Secondary	Rationale	30 Shaftsbury Drive
Size	Minimum 2.832 Ha. (7 ac) abutting a park of uniform grade.	Minimum 8.09 Ha (20 ac) abutting a park of uniform grade.	Minimum site size to accommodate known requirements with flexibility for unknown program and partnership requirements or topo constraints. Some overlap on facilities possible.	0.847 hectares <ul style="list-style-type: none"> Does not meet requirement
Frontage	Minimum 129 m (400ft) on principal frontage and 60 m on alternate.	Minimum 305 m (1000 ft) on principal frontage, 60 m on alternate.	Minimum required for bus lay-by, drop-off areas and driveway width, with provision for	67.0 m of frontage along Oldfield Drive. <ul style="list-style-type: none"> Does not meet requirement

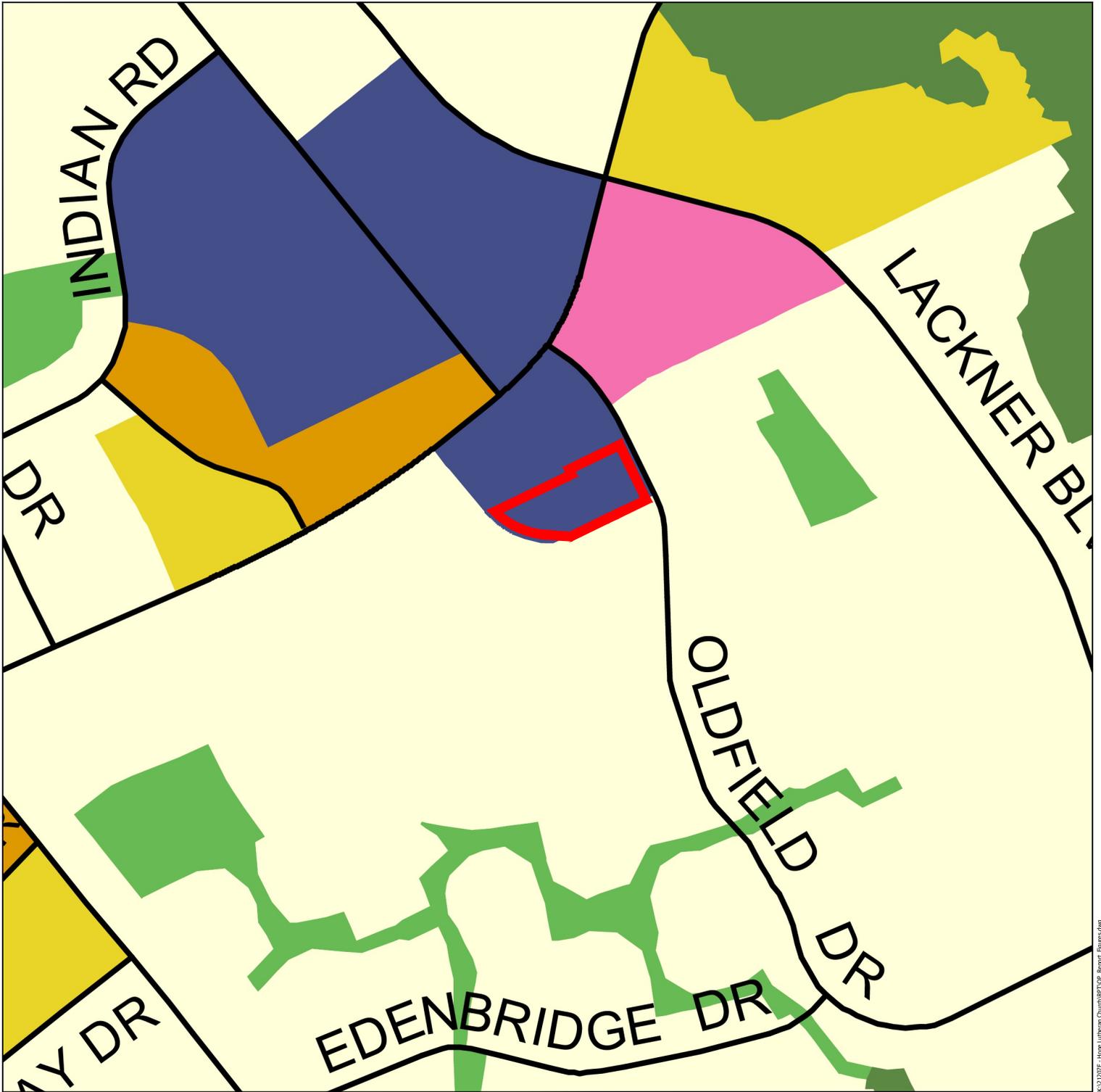


Figure 8 - City of Kitchener Official Plan Map 3 Land Use

- | | | | |
|--|-------------------------|---|-------------------------------|
|  | Subject Lands |  | Natural Heritage Conservation |
|  | Low Rise Residential |  | Open Space |
|  | Medium Rise Residential | | |
|  | High Rise Residential | | |
|  | Institutional | | |
|  | Commercial | | |



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			alternate access to site	
Shape	Regular (rectangular if possible).	Regular (rectangular if possible).	Particular emphasis on optimizing sports field layouts	Irregular shape <ul style="list-style-type: none"> • Does not meet requirement
Location	On Minor Collector Road. Registered or registerable block in plan according to Planning Act.	On Arterial Road. Registered or registerable block in plan according to Planning Act.	Bus access, municipal standard,	On Minor Neighbourhood Collector Road. <ul style="list-style-type: none"> • Meets requirement for elementary school

In summary, this analysis demonstrates that the subject lands are not suitable for school use.

In addition to the analysis above, the proposed development concept for the subject lands was circulated to the Waterloo Region District School Board (WRDSB) and the Waterloo Catholic District School Board (WCDSB) as part of the pre-consultation application. No comments on the proposed development were provided.

There are several existing institutional uses that already serve the community effectively, as shown below:

Institutional Use	Type of Use	Size of Site	Distance From Site
Grand River Collegiate Institute	Educational Facility	7.65 ha	600 m
Kitchener East Presbyterian Church	Place of Worship	0.62 ha	750 m
Crestview Public School	Educational Facility	3.99 ha	850 m
New Apostolic Church	Place of Worship	0.14 ha	1000 m
Lackner Woods Public School	Educational Facility	5.26 ha	1300 m
Calvary Kitchener	Place of Worship	1.04 ha	1300 m

The above analysis suggests that there are already several broad types of institutional uses that currently exist in the area. As a result, the overall demand for certain institutional uses in this area is limited. The site is well located relative to several existing churches, schools, and other institutional uses.

Additionally, it is important to note that the subject lands are located within a *Community Node*, which is intended to provide commercial uses with a mix of residential and institutional uses necessary to support surrounding residential communities. *Community Nodes* encourage intensification and are

transit-supportive. The proposed medium-density residential development more appropriately fulfills this policy intent than a low-density, small-scale institutional use would.

In summary, the size of the subject lands is not suitable for a number of institutional uses, as the surrounding neighbourhoods are well served by existing institutional uses. Further, the site is well-suited for residential uses, as the subject lands are located within a Community Node, and will help achieve intensification and housing targets identified by the City's Official Plan. As a result, the redesignation of the subject lands will not have a negative impact on the overall supply and distribution of institutional lands in the neighbourhood, and is appropriate.

Test 2: Acquisition of the site or a portion of it by the City for institutional or open space use, based on the park needs of the surrounding area; and,

As part of this application, a review of the parks and open spaces in the surrounding area was undertaken, as shown in *Figure 9: Surrounding Parks And Open Spaces* of this Report. There are 8 parks, open spaces or recreational uses within 800 metres of the subject lands as follows:

Parks, Open Space or Recreational Use	Type of Use	Size of Site	Distance from Site
Rosenberg Park	Park	4.71 ha	250 m
Grand River Recreation Complex	Recreational Use	0.18 ha	250 m
Grand River Arena	Regional Facility	0.48 ha	500 m
Tecumseh Park	Park	1.87 ha	800 m
Grand River Collegiate Institute Track & Field	Recreational Use	3.36 ha	250 m
Eby Park	Park	1.77 ha	700 m
Idlewood Greenway	Trail	3.17 ha	500 m
Casey Park	Park	0.9 ha	280 m

The above summary of parks, open space, and recreational uses suggests that the surrounding area is well served by a broad range of parks, recreational, and open space uses. A total of approximately 12.42 hectares of parks and green spaces, as well as two recreational facilities, are located within 800 metres of the subject lands. The area is well served by a mix of small and large-scale park uses, green spaces, trails, recreational facilities, etc., providing several opportunities for both active and passive recreation. Further, the largest park and recreational facilities are located closest to the site, suggesting that the immediate area is very well served by park and recreational uses.

The City of Kitchener’s Places and Spaces Parks Master Plan was approved in May 2025, identified the Idlewood neighbourhood where the subject lands are located as well served with active neighbourhood park space and within recommended walking distance to active neighbourhood park space. Through the Master Plan Space strategy, several communities, including the Idlewood neighbourhood, were assessed on parkland acquisition and improvement priorities. The assessment noted that there is no priority for additional parkland acquisition within the Idlewood neighbourhood.

Additionally, pre-consultation comments received from the City of Kitchener’s Parks Planning staff identified that the surrounding community is already well served with active neighbourhood park space and within recommended walking distance to active neighbourhood park space. The City does



Data Source: Google Earth Imagery 2025

Figure 9 - Surrounding Parks And Open Spaces

- Subject Lands
- Multi-use Pathway
- Open Space
- Park



not have a need for park space in this area, and as a result, is requesting cash-in-lieu be paid as part of the parkland dedication requirement of the application.

Given the information provided in the above analysis, it is concluded that sufficient parkland, open space, and recreational facilities exist in the immediate area. This conclusion has been reaffirmed by the fact that the City has not expressed any interest in purchasing the lands for park purposes or other institutional purposes at this time.

In summary, the surrounding area is well served by existing parks, open space, and recreational facilities, and the City has not expressed any interest in acquiring the land for development of any of these types of uses.

Test 3: The use of the site to meet housing targets, particularly for special needs or affordable housing.

The proposed development will contribute to the City of Kitchener's overall housing supply and will include special needs housing. While the development does not propose dedicated affordable housing units at this time, the concept allows the flexibility to incorporate such units during the Site Plan application stage, if required. In its current form, the proposed development introduces a range of apartment and townhouse units that will increase housing options and provide more attainable options within the community.

Special needs housing is defined in the City's Official Plan as any housing, including dedicated facilities, in whole or in part, that is used by people who have specific needs beyond economic needs, including but not limited to mobility requirements or support functions required for daily living. The City's Official Plan identifies the need for special needs housing, and supports the integration of these housing types in appropriate locations, including in proximity to transit, commercial uses, other compatible non-residential land uses, parks and community facilities and has convenient access to community, social and health services.

The proposed development will incorporate accessible units in the apartment building that can accommodate residents with special needs. The Site's location is within walking distance of transit services, commercial amenities, parks, and nearby community facilities, further supporting its suitability for residents requiring accessible housing units and/or additional support services.

In addition to supporting special needs housing, the overall density and mix of unit types contribute to the City's overall housing targets. By introducing a compact urban form, the development provides efficient, attainable housing options within an existing serviced area, strengthening the diversity and affordability of housing within this neighbourhood.

Summary

The tests in 15.D.7.4 are a three-part test, and each item is required to be satisfied in order for the City to consider redesignating the subject lands. We are of the opinion that the three tests are satisfied, based on the following:

- The site is not required for institutional uses, as the area is well served by institutional uses in the area.
- The site size and configuration limit the range and type of institutional uses that can be located on the subject lands.

- The surrounding area is very well served by parks, open space and recreational uses, and the City has not expressed any interest in acquiring the land for development of any of these types of uses.
- The application proposes a development that seeks to assist with achieving housing targets and provides special needs housing.
- The site is within a community node, which is intended to provide commercial uses with a mix of residential and institutional uses necessary to support surrounding residential communities. The proposed medium-density residential development more appropriately fulfills this policy intent.

Given the foregoing analysis of the policies included in Section 15.D.7.4, it is our opinion that the conversion of the subject lands from institutional to residential is appropriate.

4.3.3 Land Use Policies for a Complete & Healthy Kitchener: Residential

Section 15.D.3 of the City's OP sets out policies for lands designated *Residential*. The applications propose to redesignate the subject lands from *Institutional* to *Medium Rise Residential*. The *Medium Rise Residential* designation is intended to accommodate a range of medium-density housing forms, including townhouse dwellings in a cluster development, multiple dwellings and special needs housing.

The following policies are important to consider when defining the *Medium Residential* designation:

- The net residential density for lands which are designated Medium Rise Residential will be a minimum of 30 units per hectare to a maximum of 200 units per hectare (15.D.3.17);
- A minimum Floor Space Ratio of 0.6 and a maximum Floor Space Ratio of 2.0 will apply to all development and redevelopment (15.D.3.18);
- No building will exceed 8 storeys or 25 metres in height, whichever is the lesser, at the highest grade elevation (15.D.3.19).

The proposed development proposes a density of 104 units per hectare and a floor space ratio of 0.9. The maximum height of the building is 6 storeys.

The City of Kitchener Official Plan identifies a series of criteria for considering new medium-rise residential redevelopment opportunities, in Section 15.D.3.21. Medium Rise Residential uses will generally:

- result in the preservation of features of the natural environment which may otherwise be compromised with more dispersed low-density development;
- take advantage of vistas;
- constitute neighbourhood landmarks or reference points;
- be located within walking distance of nodes, corridors and public transit stops and non-residential uses; and,
- have a strong focus placed on the creation of links for pedestrians and cyclists with surrounding non-residential uses.

The proposed development will offer a mid-rise built form within a transitional area of Kitchener. The subject lands are well-connected to existing transit routes, including high-order rapid transit routes 204 and 205, which have stops located within approximately 300 metres of the site. The surrounding area features a well-established pedestrian network, including sidewalks and trail networks, facilitating active modes of transportation such as walking and cycling.

There are no natural heritage features designated on the property. Existing trees will be retained as much as feasible. A Tree Management Plan will be prepared to support the future site plan application.

4.3.4 Public Health and Safety

Section 6 of the City's Official Plan sets out policies for public health and safety to ensure that land use planning decisions promote and protect the health and well-being of people and achieve a complete and healthy community. Section 6.C.3 of the City's OP speaks to the management of noise, vibration and emissions, including light emissions, in the City to ensure the health and well-being of the residents of Kitchener.

The proposed applications are supported by an Environmental Noise Study, prepared by JJ Acoustics Engineering dated November 3, 2025, which concludes that the development concept is feasible from a noise impact perspective, and identifies some transportation and stationary noise impacts that can be mitigated through appropriate noise attenuation measures at the time of a future site plan application. Vibration and emission impacts associated with the development concept are not anticipated.

4.3.5 Servicing and Utilities

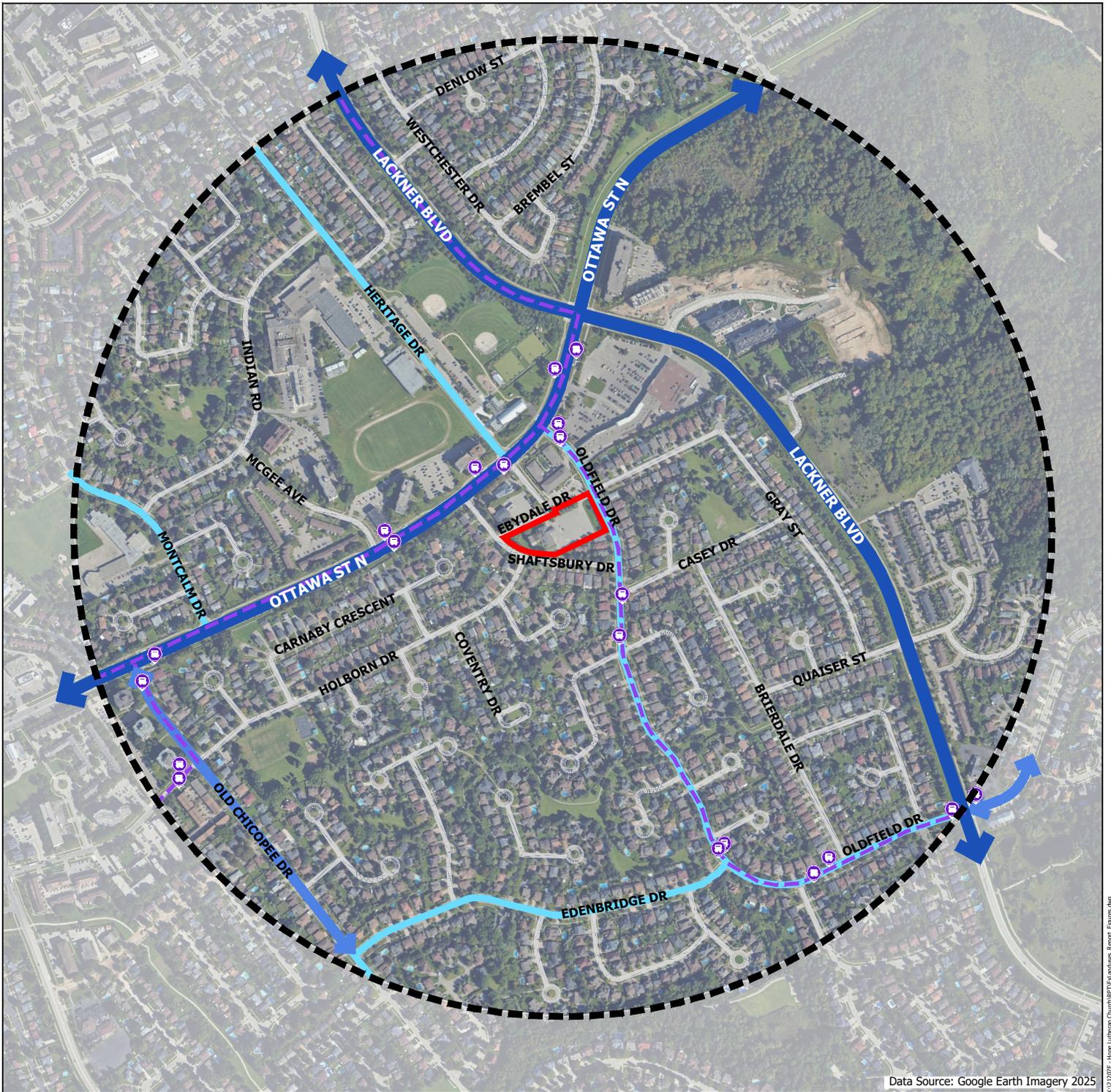
Section 14 of the City's OP set out policies for the appropriate provision of municipal services, utilities, facilities and infrastructure.

The Functional Servicing & Stormwater Management Report prepared by Walterfedy dated December 2, 2025, concludes that the subject lands are serviceable with existing municipal infrastructure.

4.3.6 Integrated Transportation System

Section 13 of the City's Official Plan guides the City and future development through a set of policies which are intended to facilitate the creation of an integrated transportation system that incorporates active transportation, allows for the movement of people and goods, and promotes a vibrant, healthy community with a wide range of transportation choices in the City of Kitchener.

The subject lands are located adjacent to Oldfield Drive, Ebydale Drive, and Shaftsbury Drive. Per Map 11 (Integrated Transportation System) in the City Official Plan, Oldfield Drive is identified as a Minor Neighbourhood Collector Street, and Ebydale Drive and Shaftsbury Drive are identified as Local Streets (**Figure 10: Circulation Transportation**). Further to this, the subject lands are within walking distance of Ottawa Street N (120 m) and Lackner Boulevard (400 m), which are identified as Regional Roads. Public transportation services can be accessed directly in front of the site along



Data Source: Google Earth Imagery 2025

Figure 10 - Circulation Transportation

- Subject Lands
- Regional Road
- Major Community Collector Street
- Minor Neighbourhood Collector Street
- Local Roads
- Grand River Transit (GRT) Route
- B Bus Stop





Data Source: Google Earth Imagery 2025

Figure 11 - Circulation Active Transportation Routes

- Subject Lands
- Secondary Multi-use Pathway/Connection
- Multi-use Pathway
- Bike Lane



Oldfield Drive and within a 5-minute walking distance from Ottawa Street N, providing connection to local bus routes, regional bus routes, rapid transit routes, and LRT stations.

The subject lands are well serviced by several GRT bus routes (routes 23, 205, 204, 1, 20, and 28) that support the accessible and efficient movements of residents throughout the city and the region.

Further, municipal sidewalks along Shaftsbury Drive, Oldfield Drive, Ebydale Drive, and multi-use pathways and bike lanes and sidewalks along Ottawa Street North and Lackner Boulevard offer convenient and safe active transportation connections to daily needs and amenities and other areas of the City (**Figure 11: Circulation Active Transportation Routes**).

4.3.7 Urban Design

An Urban Design Brief has been prepared in support of this application by MHBC Planning Ltd, dated December 1, 2025, which reviews the proposed development in the context of the City of Kitchener Official Plan urban design policies and the City's Urban Design Manual as discussed in Section 5.1 of this Report.

4.3.8 Official Plan Summary

In summary, the proposed Official Plan Amendment conforms to the general intent of the Official Plan. The proposed development will result in the intensification of an underutilized parcel of land within a Community Node and the Built-Up Area.

The proposed development will contribute to achieving the City's proposed intensification and density targets. The proposed development has been designed in consideration of the surrounding low-rise residential context and will be compatible with adjacent uses, including low-rise residential uses, commercial uses, institutional uses, and park spaces. The redesignation of the subject lands from Institutional to Residential will not have any negative impact on the overall supply and distribution of institutional lands in the community.

4.4 City of Kitchener Zoning By-law

The City of Kitchener's current Zoning By-law, 2019-051, was established through the City's Comprehensive Review of Zoning By-law 85-1 ("CRoZBy") to replace Zoning By-law 85-1.

4.4.1 Existing Zoning

The subject lands are zoned *Institutional (INS-1)* in the City of Kitchener Zoning By-law 2019-051 ("City's Zoning By-law"), as shown on **Figure 12: Existing Zoning** of this Report.

The INS-1 Zone is intended to accommodate a range of institutional uses intended to serve the surrounding residential communities. Permitted uses include places of worship, cultural and community facilities, schools and educational establishments, daycare facilities, health care facilities, and artisan establishments.

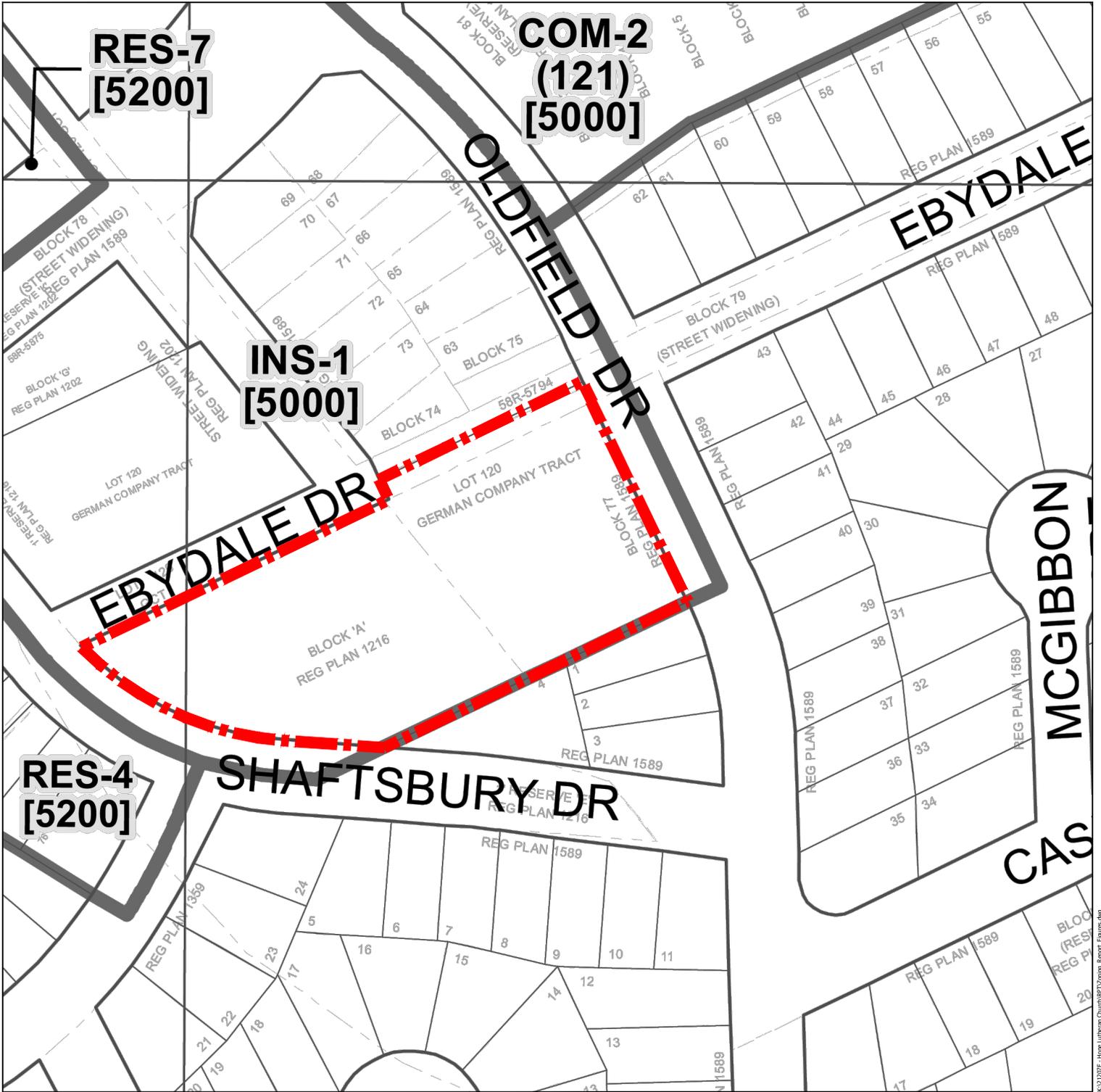


Figure 12 - City of Kitchener Zoning Grid Schedule 235

-  Subject Lands
-  By-Law 2019-051
-  By-Law 85-1 and Other



The INS-1 Zone does not permit multiple residential uses or townhouse dwellings and permits primarily institutional uses with some accessory convenience retail, office, financial establishment, restaurant, and personal services located in the same building as the principal use.

4.4.2 Proposed Zoning

The application proposes to amend the zoning on the subject lands to *RES-6 Medium Rise Residential* with site-specific provisions. The following table provides an analysis of the RES-6 zoning regulations against the proposed development and identifies any special provisions that are required as part of the Zoning By-law Amendment application to permit the proposed development.

Table 1: Zoning By-law Analysis for Multiple Dwellings

Provision	Required	Provided	Compliance
Permitted Uses	<ul style="list-style-type: none"> • Townhouse Dwelling Cluster – • Multiple Dwelling • Lodging House • Continuing Care Community • Hospice • Residential Care Facility (small & large) • Artisan’s Establishment • Community Facility • Convenience Retail • Day Care Facility • Home Occupation • Office • Studio 	Multiple Dwelling	Yes
Minimum Lot Width	30.0 m	22.0 m	No Amendment Requested
Minimum Front Yard or Exterior Yard Setback	3.0 m	14.1 m	Yes
Minimum Interior Side Yard Setback	4.5 m	28.8 m	Yes
Minimum Rear Yard Setback	7.5 m	14.8 m	Yes

Minimum Landscaped Area	20%	42%	Yes
Minimum Floor Space Ratio	0.6	0.93	Yes
Maximum Floor Space Ratio	2.0		
Minimum building height	11.0 m	TBD	TBD
Maximum Building Height	25.0 m		
Maximum number of storeys	8	6	Yes
Minimum number of dwelling units	5	82 units	Yes
Maximum number of dwelling units	-		
Private Patio Area	Each dwelling unit located at ground floor level shall have a patio area adjacent to the dwelling unit with direct access to such dwelling unit.		
Minimum Parking Spaces	1.0 per dwelling unit (82)	82	Yes
Minimum Visitor Parking Spaces	0.1 per dwelling unit (8)	13	Yes
Maximum Parking Spaces (including visitor)	1.4 per dwelling unit (114)	95	Yes
Barrier-Free Accessible Parking Spaces	4% (4 spaces)	4	Yes
Minimum Class A Bicycle Parking Stalls	0.5 per dwelling unit	41	Yes
Minimum Class B Bicycle Parking Stalls	6	6	Yes

Table 2: Zoning By-law Analysis for Street-Facing Towns

Provision	Required	Provided	Compliance
Permitted Uses	<ul style="list-style-type: none"> Townhouse Dwelling Cluster – 		Townhouse Dwelling – Street not permitted. Amendment Requested

	<ul style="list-style-type: none"> • Multiple Dwelling • Lodging House • Continuing Care Community • Hospice • Residential Care Facility (small & large) • Artisan's Establishment • Community Facility • Convenience Retail • Day Care Facility • Home Occupation • Office Studio 		
Minimum Lot Area	135.0 m ²	Unit 1: 250.1 m ² Unit 2-5: 174.4 m ² /unit Unit 6: 350.3 m ²	Yes
Minimum Lot Width (Internal Unit)	5.5 m	6.0 m	Yes
Minimum Lot Width (External Unit)	9.5 m	N/A	-
Minimum Corner Lot Width	11.5 m	N/A	-
Minimum Front Yard or Exterior Yard Setback	4.5 m	5.7 m and 6.0 m to garage	Yes
Minimum Interior Side Yard Setback	2.5 m	2.5 m	Yes
Minimum Rear Yard Setback	7.5 m	6.0 m	Amendment Requested
Maximum Lot Coverage	55%	49%	Yes
Maximum Building Height	11.0 m	TBD	TBD
Maximum number of Storeys	3	2	Yes
Minimum Parking Spaces	1.0 per dwelling unit (6)	6	Yes

4.4.3 Site-Specific Provisions

To implement the development concept, the applicant is requesting an amendment to the Zoning By-Law 2019-051 with a number of site-specific provisions. A draft zoning by-law for the proposed Zoning By-law Amendment application is enclosed as **Appendix B** to this Report.

Permitted Uses

The Zoning By-law Amendment requests to permit the use of street-facing townhouse dwellings in the RES-6 zone, whereas Section 7.2 of the Zoning By-law does not permit street-facing townhouse dwellings. As discussed in Section 4.3 of this Report, the subject lands are located within a Community Node in the City of Kitchener, which is intended to intensify and be transit-supportive in inter-neighbourhoods. Specifically, as discussed in Section 4.3.1 of this Report, the development concept satisfies the intent of the Community Node, established by Section 3 of the City's OP.

The subject lands front onto Oldfield Drive, a Minor Neighbourhood Collector Street, and Shaftsbury Drive and Ebydale Drive, both of which are Local Streets. The subject lands are predominantly adjacent to low-rise residential uses, which include single detached, semi-detached, and townhouse units. The proposed street-facing townhouses are to front along Oldfield Drive. These units will complement the surrounding neighbourhood, acting as an appropriate transition in scale and massing from the surrounding built form to the proposed 6-storey apartment building.

The intent of the street-facing townhouses is to provide a built form that contributes to an active and engaging streetscape along Oldfield Drive while reinforcing the character of the existing low-rise residential character of the area. The inclusion of six townhouse units will support the principles of compatible intensification by integrating a higher-density form in a manner that still respects the surrounding neighbourhood context. Permitting street-facing townhouses within the RES-6 zone is consistent with the City's broader intensification objectives by promoting a diverse range of housing forms within an intensification area. The proposed townhouse dwellings will function as a logical and desirable component of the overall development, acting as a transition between the adjacent low-rise dwellings and the proposed mid-rise apartment building.

Minimum Rear Yard Setback

The Zoning By-law Amendment requests to permit a minimum rear yard setback of 6.0 metres for the street-facing townhouse dwellings, whereas Section 7.3 of the Zoning By-law requires a minimum rear yard setback of 7.5 metres.

The intent of this provision is to ensure sufficient space is provided between built forms and to minimize visual impacts on adjacent properties.

There is significant space between Block B and the apartment building in Block A. There is a 28.9 metre setback between the townhouses in Block B and the apartment building in Block A. Located directly behind Block B is a surface parking lot for Block A. The reduced rear yard setback will not cause any visual impacts on adjacent properties.

Minimum Lot Width

The Zoning By-law Amendment requests to permit a minimum lot width of 22.0 metres for the residential apartment building, whereas Section 7.3 of the Zoning By-law requires a minimum lot width of 30.0 metres.

The intent of the lot width requirement is to ensure that development parcels provide adequate frontage to accommodate access, landscaping, servicing, and to maintain a consistent pattern of lot fabric along streets.

The subject lands are irregular in shape and front onto Oldfield Drive, Shaftsbury Drive, and Ebydale Drive. The apartment building in Block A is centrally located on the site and is oriented towards Shaftsbury Drive. Block A has a frontage of 22.0 metres along Oldfield Drive, as Block B also fronts Oldfield Drive. The small portion of Block A along Oldfield Drive is used for surface parking and does not connect to the street. The limited frontage results from the configuration of the site, and the future severance of Block B from Block A, rather than an undersized parcel or functional constraint.

The proposed development maintains appropriate access, circulation, and servicing arrangements for the apartment building and provides sufficient lot area to accommodate setbacks, landscaping, and parking. The reduced lot width along Oldfield Drive does not comprise the design or functionality of the development and continues to meet the intent of the Zoning By-law.

The requested uses and reductions meet the intent of the City of Kitchener Official Plan, the City of Kitchener Zoning By-law, are considered minor in nature, and are appropriate for the development of the subject lands, maintaining compatibility with the surrounding context and achieving efficient use of the site.

5.0 Summary of Reports

The following reports were requested through Formal Consultation to support the request for an Official Plan Amendment and Zoning By-law Amendment application by the City of Kitchener and other agencies. A brief summary of the findings of each report has been provided below.

5.1 Urban Design Brief

MHBC Planning Ltd prepared an Urban Design Brief in support of the proposed applications, dated December 1, 2025. The Urban Design Brief includes an analysis of the relevant urban design policies from the City of Kitchener's Official Plan and the City of Kitchener's Urban Design Guidelines.

The Urban Design Brief concludes that the proposed development:

- Incorporates a mix of housing types that create a compact, efficient and contextually appropriate development that complements the existing and surrounding neighbourhood;
- Creates barrier-free pedestrian and cyclist connections that promote active transportation;
- Utilize façade design and material palettes that complement the surrounding context, and;
- Incorporate a transition in height and massing to ensure compatibility with adjacent uses.

The Urban Design Brief concludes that the proposed development and associated Official Plan Amendment and Zoning Bylaw Amendment reflect the design intent, policies, and guidelines of the City's Official Plan and Urban Design Guidelines and represent good urban design.

5.2 Functional Servicing, Stormwater Management, and Water Distribution Report

A Functional Servicing, Stormwater Management, and Water Distribution Report, dated December 2, 2025, was prepared by Walterfedy in support of the proposed applications and provides a review of the opportunities and constraints for the subject property to demonstrate functional serviceability. The Report also reviews the requirements of reviewing agencies and provides a description of the development concept.

The Report concludes as follows:

- The proposed development can be adequately serviced by existing and planned municipal water, sanitary, and stormwater infrastructure, as well as available utility services including gas, hydro and cable;
- Required municipal servicing and roadworks can be constructed in accordance with the City of Kitchener and MECP standards.
- Stormwater management measures can be satisfied through the proposed measures, which conform to applicable municipal and agency guidelines;
- Block A will connect to existing municipal infrastructure, including a 200-mm sanitary sewer on Shaftsbury Drive, a 150-mm storm connection, and a 25-mm water service;

- Each unit in Block B will be serviced by 100-mm sanitary laterals connecting to the existing 200-mm sanitary sewer on Oldfield Drive, 150-mm storm connections to the existing 300-mm storm sewer, and a 25-mm water service from the existing 200-mm watermain;
- An infiltration gallery will help in achieving the water balance for the overall site;
- There is sufficient storage volume available in the proposed SWMFs to reduce the overall post-development peak flows to below pre-development levels;
- The proposed municipal storm sewer system can be sized to convey the 5-year minor system flows to the proposed SWMFs, with major flows routed via the internal road network to overland flow inlets into the SWMFs.
- Erosion control measures will be required and will be reviewed and designed during the detailed design stage.

5.3 Noise Impact Study

A Road Traffic and Stationary Noise Impact Study was prepared by JJ Acoustics Engineering Ltd, dated November 3, 2025, in support of the proposed applications and associated development. The Study evaluates potential noise impacts from surrounding transportation and stationary sources, reviews applicable MOECP- NPC-300 and Region of Waterloo noise guidelines.

The report concludes that the development concept is feasible from a noise impact perspective and identifies the required mitigation measures to ensure compliance with applicable noise criteria. Transportation and stationary noise impacts can be mitigated as follows:

- Provision of central air conditioning for all units to allow windows to remain closed and ensure noise levels meet NPC-300 criteria;
- Implement Type C warning clauses for units along the north facades of Blocks A and B, advising purchasers and tenants of potential increased noise levels; and
- Implement Type A warning clauses for Outdoor Living Areas.

The noise from the Site to the neighbouring buildings could not be accounted for because the Site has not undergone mechanical design yet. An addendum to this Noise Study will be completed once the mechanical design is complete to verify that any noise generated from the site meets NPC-300 limits to neighbouring buildings.

5.4 Transportation Impact Study

Salvini Consulting prepared a Transportation Impact Study, dated December 1, 2025, in support of the proposed applications. The study was prepared in consultation with City of Kitchener staff to evaluate the transportation context and infrastructure needed to support the proposed development. The Study assesses operations based on a five-year horizon of 2030 and a Concept Plan consisting of 82 apartment units and six (6) street-fronting townhomes. The study concludes as follows:

- The proposed development is expected to generate approximately 34 trips during both the weekday morning and afternoon peak hours, whereas the existing church uses generates minimal weekday traffic, but may reach close to 100 trips during peaking activity on Sunday.

- The Ottawa Street and Heritage Drive intersection currently operates at acceptable levels of service and is forecast to continue to operate acceptably under 2030 background and total traffic conditions, with and without the proposed development.
- A new driveway connection to Ebydale Drive is proposed, aligned opposite the existing access to the KW Musicial Productions site. A single lane, stop-controlled approach is recommended, and operations at this access are projected to remain acceptable during both study peak hours.
- Pedestrian connections to the site are proposed to Ebydale Drive, Shaftsbury Drive, and Oldfield Drive, offering direct connections to existing active transportation infrastructure and ensuring safe pedestrian access to and from the site.

The report concludes that the proposed development can be accommodated within the existing and planned transportation system.

6.0 Summary & Conclusions

As outlined in this Report, and accompanied by the supporting technical studies, plans and reports, the proposed Official Plan Amendment and Zoning By-law amendment is appropriate and represents good planning for the following reasons:

- The proposed Official Plan Amendment and Zoning By-law Amendment are consistent with the Provincial Policy Statement (2024);
- The proposed Official Plan Amendment and Zoning By-law Amendment conform to and implement the objectives and policy direction of the City of Kitchener Official Plan, including the Medium Rise Residential designation, and residential intensification policies;
- The proposed applications will assist the City in achieving Provincial and City population forecasts, housing targets and intensification targets and will provide for a transit supportive density and contribute to the range and mix of housing options within the Built-Up Area;
- The subject lands are well situated for the proposed medium-density residential use, considering its proximity to established retail, commercial, community uses, recreational uses, parks and existing and planned public transit routes, and will contribute to the development of a complete community and walkable neighbourhood in the Built-Up Area;
- Adequate servicing infrastructure and capacity are available to accommodate the proposed development; and
- The proposed site-specific amendments to the City's Zoning By-law will appropriately implement the intended building design and site layout.

Overall, the proposed Official Plan Amendment and Zoning By-law Amendment allows for a multiple residential development that contributes to the housing options in the neighbourhood, is compatible with the surrounding area, is well serviced by existing community uses and resources, and efficiently uses the subject lands and applicable infrastructure and transit services.

Respectfully submitted,

MHBC



Dave Aston, MSc, MCIP, RPP
Partner



Stephanie Mirtitsch, BES
Associate

A

Appendix A: Draft Official Plan Amendment

DRAFT OFFICIAL PLAN AMENDMENT

_____2026

A BY-LAW TO ADOPT OFFICIAL PLAN AMENDMENT NUMBER ____
TO THE OFFICIAL PLAN OF THE CORPORATION OF THE CITY OF KITCHENER
(Being a by-law to amend the City of Kitchener Official Plan, as amended
known as the Official Plan for the City of Kitchener –
Cook Homes Waterloo Limited – 30 Shaftsbury Drive)

WHEREAS it is deemed expedient to amend the City of Kitchener Official Plan for the lands
specified above;

NOW THEREFORE, the Council of the Corporation of the City of Kitchener enacts as
follows:

1. Amend Map 3 – Land Use by designating the lands legally identified as PLAN
1216 PT BLK A GCT PT LOT 120 as ‘Medium Rise Residential’ instead of
‘Institutional’, as shown on Schedule ‘A’ hereto:
2. Modify Section 15.D.12.X by adding the following as a new subsection:

*“Notwithstanding the Medium Rise Residential land use designation
on lands municipally known as 30 Shaftsbury Drive, street-facing
townhouse dwellings shall be permitted.”*

PASSED THIS _____ DAY OF _____, 2026.

MAYOR

CLERK

B

Appendix B: Draft Zoning By-law Amendment

DRAFT ZONING BY-LAW

_____2026

BY-LAW NUMBER ____ OF THE

CORPORATION OF THE CITY OF KITCHENER

(Being a by-law to amend By-law 2019-051, as amended
known as the Zoning By-law for the City of Kitchener –
Cook Homes Waterloo Limited – 30 Shaftsbury Drive)

WHEREAS it is deemed expedient to amend By-law 2019-051 for the lands specified above;

NOW THEREFORE, the Council of the Corporation of the City of Kitchener enacts as follows:

1. Zoning Grid Schedule Numbers 224 and 235 of Appendix “A” to By-law 2019-051 are hereby amended by changing the zoning applicable to the parcels of land specified and illustrated on Map No. 1 in the City of Kitchener, attached hereto, from Neighbourhood Institutional (INS-1) to Medium Rise Residential Six Zone (RES-6) with Site Specific Provisions (XX).
2. Section 19 of By-law 2019-051 is hereby amended by creating Site-Specific Provision (XX) thereto as attached in Schedule A to this By-law:

“Within the lands zoned RES-6 and shown as affected by this provision on Zoning Grid Schedules 224 and 235 of Appendix A, the following shall apply:

- a) *Street-facing townhouse dwellings shall be permitted;*
 - b) *the minimum lot width shall be 22 metres;*
 - c) *the minimum rear yard setback shall be 6 metres*
3. That this By-law shall become effective only if Official Plan Amendment No. XX comes into effect, pursuant to Section 24(2) of the Planning Act, R.S.O. 1990, c. P. 13, as amended.

PASSED THIS _____ DAY OF _____, 2026.

MAYOR

CLERK