PLANNING JUSTIFICATION REPORT

REV. 2 [2026-08-31]

170 & 180 COLUMBIA STREET W, WATERLOO

Official Plan Amendment & Zoning By-Law Amendment Applications

up consulting



EXECUTIVE SUMMARY

This Planning Justification Report ('Report') has been prepared as part of the resubmission ('Resubmission No. 2') of the Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications for the proposed mixed-use development of the properties municipally known as 170 & 180 Columbia Street West ('Subject Lands', 'Subject Property', 'Site'). The applicant has made several changes to the original development concept, which was the basis for the original OPA and ZBA applications, as well as further refinements following Resubmission No. 1 in February 2026. This Report and the accompanying revised application materials reflect the current August 2026 development proposal.

The applicant is proposing a multi-phase mixed-use development that will be executed over five (5) phases and two (2) properties: 170 and 180 Columbia Street West. The 170 Columbia St W lands consist of Phases 1 and 2, while the 180 Columbia St W lands consist of Phases 3, 4 and 5. The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 25 to 35 storeys. Ground floor retail and office units are provided, as well as a range of indoor and outdoor amenity spaces throughout the development. The proposed development comprises a total of 1,907 dwelling units and 2,889 bedrooms across the five (5) phases, together with approximately 2,967 m² of retail, office and flexible retail/office floor area.

In May 2025, an OPA and ZBA were submitted with regard to the Subject Lands. Following comments on the application received from the City, the applicant prepared Resubmission No. 1 in February 2026, which included revisions to the development concept and supporting application materials. Following further circulation and review of Resubmission No. 1, additional comments were received from City staff and commenting agencies. These comments, together with subsequent discussions with City staff, have informed Resubmission No. 2 and further refinements to the proposed development. Notably, the current proposal provides for a dedicated municipal parkland block at the north end of the 170 Columbia Street West lands, an increased non-residential component, and corresponding refinements to the site layout and supporting technical studies.

The updated OPA and corresponding ZBA reflect the updated development concept shown in the corresponding architectural plans prepared by AAA Architects. The revised OPA seeks only those site-specific policy permissions that remain necessary to facilitate the current proposal, including permissions related to building height and density, as well as non-residential use floor area. The ZBA similarly establishes the applicable SAMU zoning framework and site-specific provisions related to matters including built form, setbacks, amenity areas, parking and bicycle parking, non-residential uses, and other technical and implementation matters necessary to facilitate the proposed comprehensive development.

This Report discusses the existing conditions of the subject property, the neighbourhood context of the Site, the existing land use planning controls which apply, the required land use planning applications, the land use planning rationale with respect to the same, the required supporting studies, and consultation strategy.

Specific consideration has been given to assessing the existing land use planning controls which currently apply to the lands and the suitability of these lands for mixed-use purposes in a Major Transit Station Area. Based on our review of the Site and its context, it is our opinion that a high-density mixed-use development would be appropriate for the Subject Lands, which largely reflects the planning function of the area.

This Report provides land use planning opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*, is consistent with the Provincial Planning Statement, and conforms to the Regional Official Plan.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the proposed development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

TABLE OF CONTENTS

1. INTRODUCTION 1
2. SITE LOCATION 3
3. CONTEXT ANALYSIS 5
4. PROPOSAL DETAILS 7
   a) Original Proposal - May 2025 7
   b) Feedback on Original Proposal 7
   c) Resubmission No. 1 – February 2026 8
   d) Feedback on Resubmission No. 1 10
   e) Resubmission No. 2 – August 2026 (Current Plan) 12
      i. Unit Breakdown 13
      ii. Access, Circulation, and Parking 14
      iii. Bicycle Parking Spaces 15
      iv. Common Amenity Areas 16
      v. Non-Residential Uses 17
      vi. Phasing or Development Implementation Strategy 18
5. REQUESTED APPROVALS – REVISED 22
   a) Official Plan Amendment 23
   b) Zoning By-Law Amendment 24
6. LAND USE PLANNING FRAMEWORK 27
   a) Planning Act 27
      i. Matters of Provincial Interest 27
   b) Provincial Planning Statement (2024) 29
   c) Region of Waterloo Official Plan 35
      i. Urban Area and Built-Up Area 36
      ii. Where and How to Grow 38
      iii. Major Transit Station Area Policies 39
      iv. Transit-Supportive Development Policies 41
      v. Source Water Protection 42
   d) City of Waterloo Official Plan 43
      i. Land Use Designation – Station Area Mixed-Use 43
      ii. City Structure – Major Node 51
      iii. Built Form – High Rise, 30 Storeys 54
      iv. Source Water Protection Area – Wellhead Protection Sensitivity Area 8 59

v. Road Classification – City Arterial 60
vi. Active Transportation Framework 61
vii. Major Transit Station Areas - Research and Technology Station Area 62
viii. Urban Design 64
e) City of Waterloo Zoning By-Law 64
i. Proposed Zoning 65
ii. Holding Provision (H) 75
iii. Lot Line Interpretation 76
iv. Amenity Area Definition 77
7. LAND USE PLANNING RATIONALE 79
a) Alignment with Overarching Planning Framework 79
b) Efficient Use of Infrastructure and Municipal Services 79
c) Density 80
d) Height and Massing 80
e) Tower Separation from Interior Lot Lines 84
f) Street Line and Side Yard Setbacks 86
g) Railway Setback 86
h) Rooftop Amenity Space 87
i) Underground Parking Setback 88
8. SUPPORTING STUDIES 90
a) Urban Design Brief 90
b) Functional Servicing & Stormwater Management Report (Revised – July 2026) 91
c) Transportation Impact Study (Revised – August 2026) 92
d) Pedestrian Level Wind Study (Revised – August 2026) 93
e) Geotechnical Investigation 94
f) Transportation Noise and Vibration Assessment (Revised – August 2026) 95
g) Land Use Compatibility Assessment (Revised – August 2026) 97
h) Development Viability Assessment (Rail Safety Report) 99
i) Shadow Study Analysis 100
j) Energy Strategy 101
9. PUBLIC CONSULTATION STRATEGY 102
10. CONCLUSION AND RECOMMENDATIONS 103

TABLE OF FIGURES

Figure 1: Location of Subject Property (Source: Region of Waterloo GIS Portal)..... 3

Figure 2: Existing building located on 170 Columbia St W facing North (Source: Google Maps) 4

Figure 3: Existing building located on 180 Columbia St W facing North-West (Source: Google Maps) 4

Figure 4: Neighbourhood Context Map (Source: Region of Waterloo GIS Portal)..... 6

Figure 5: Revised Site Plan prepared by AAA Architects Inc. 13

Figure 6: Revised Master / Staging Plan prepared by AAA Architects Inc. 19

Figure 7: Region of Waterloo Official Plan - Map 2 (Urban System)..... 37

Figure 8: Region of Waterloo - Figure 4c, Research & Technology Park (Major Transit Station Areas) 41

Figure 9: City of Waterloo Official Plan - Schedule 'A' (Land Use Plan) 50

Figure 10: City of Waterloo Official Plan Schedule 'B' (City Structure) 54

Figure 11: City of Waterloo Official Plan - Schedule 'B1' (Built Form)..... 59

Figure 12: City of Waterloo Official Plan - Schedule 'B4' (Source Water Protection Areas)..... 60

Figure 13: City of Waterloo Official Plan - Schedule 'E' (Road Classification System) 61

Figure 14: City of Waterloo Official Plan - Schedule 'F' (Active Transportation Framework) 62

Figure 15: City of Waterloo Official Plan - Schedule 'J3' (Research and Technology Station Area) 64

Figure 16: City of Waterloo Zoning By-law – Schedule 'A' 65

Figure 17: 525-565 Conestogo Road W, Waterloo – 3D Renderings (Source: Turner Fleischer) 82

Figure 18: 615 King Street W, Kitchener – 3D Renderings (Source: KIRKOR Architects and Planners)..... 83

Figure 19: 200 Victoria Street S, Kitchener – 3D Renderings (Source: Arcadis) 84

1. INTRODUCTION

This Report has been prepared as part of the Resubmission No. 2 for the Official Plan Amendment and Zoning By-law Amendment applications pertaining to the proposed mixed-use development of the properties municipally known as 170 and 180 Columbia Street West, Waterloo.

The applicant is proposing a comprehensive, multi-phase mixed-use development to be implemented over five (5) phases and two (2) properties. The 170 Columbia Street West lands consist of Phases 1 and 2, while the 180 Columbia Street West lands consist of Phases 3, 4 and 5. The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 25 to 35 storeys. The development will provide a mix of residential, retail and office uses, together with indoor and outdoor amenity areas, common outdoor areas, and a dedicated municipal parkland block at the north end of the 170 Columbia Street West lands. In total, the current proposal comprises 1,907 dwelling units and 2,889 bedrooms, together with approximately 2,967 m² of retail, office and flexible retail/office floor area.

In May 2025, Official Plan Amendment and Zoning By-law Amendment applications were submitted for the subject lands. In July 2025, an Informal Meeting of Council was held where the applications were formally introduced to Council and the public. Following the receipt of comments from City staff, commenting agencies, City Council, and the public, the applicant revised the development concept and submitted Resubmission No. 1 in February 2026. Following further circulation and review of those materials, additional comments and discussions with City staff and commenting agencies informed further refinements to the development concept and supporting technical studies, which form the basis of the current Resubmission No. 2.

The revised Official Plan Amendment and corresponding Zoning By-law Amendment reflect the current development concept shown on the architectural plans prepared by AAA Architects. The revised Official Plan Amendment seeks only those site-specific policy permissions that remain necessary to facilitate the current proposal, including permissions related to building height and density, as well as non-residential use floor area. The Zoning By-law Amendment similarly reflects the applicable Station Area Mixed Use (SAMU) zoning framework and seeks site-specific provisions pertaining to matters including built form, setbacks, amenity areas, parking and bicycle parking, non-residential uses, and other technical and implementation matters necessary to facilitate the proposed comprehensive development.

This Report discusses the existing conditions of the subject property, the neighbourhood context of the Site, the existing land use planning controls which apply, the required land use planning applications, and land use planning rationale with respect to the same.

Specific consideration has been given to assessing the existing land use planning controls which currently apply to the lands and the suitability of these lands for mixed-use purposes in a Major Transit Station Area. Based on our review of the Site and its context, it is our opinion that the development of a mixed-use high-density development would be appropriate and largely reflect the planned built form of the area.

This Report provides land use planning opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*, is consistent with the Provincial Planning Statement, and conforms to the Regional Official Plan.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the proposed development to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

2. SITE LOCATION

The Subject Lands are municipally addressed as 170 & 180 Columbia Street West in the City of Waterloo and known legally as PT Lot 36 RP58R8516 PTS 13-21 Plan 717 Waterloo; and PT Lot 36 RP58R8516 PTS 1-3 Plan 717 Waterloo.

The Subject Lands are shown on Figure 1, below. The Subject Lands are located on the north side of Columbia Street West, east of the Region's Rail Corridor (and Laurel Trail), and west of Phillip Street, in the area colloquially known as "Columbia".



Figure 1: *Location of Subject Property (Source: Region of Waterloo GIS Portal)*

The Subject Lands have a combined total area of 15,978.7 square metres, with a combined frontage of 102.2 metres along Columbia Street West. The existing sites consist of parking areas and two (2) office buildings, which are proposed to be demolished to facilitate the proposed development. Figures 2 and 3, p. 4 below, show the existing buildings on each site.



Figure 2: *Existing building located on 170 Columbia St W facing North (Source: Google Maps)*



Figure 3: *Existing building located on 180 Columbia St W facing North-West (Source: Google Maps)*

3. CONTEXT ANALYSIS

The broader neighbourhood contains a mix of office, institutional, residential and retail uses. Directly north and east of the Subject Lands are several office buildings. The University of Waterloo campus is located directly to the south and southwest of the properties, while directly west is the Research and Technology Park containing several office and commercial spaces.

Further west of the Subject Lands are several student residences, ranging from four (4) to six (6) storeys in height. Additionally, the Columbia Icefield, Columbia Lake, and the adjacent environmental reserve are located further west of the Subject Lands. To the east, the Site is within close proximity to mixed-use and residential uses of varying densities. Several high-density mixed-use developments are found on the east side of Phillip Street, with additional medium- and low-density residential developments located on Lester Street, Hickory Street, Columbia Street West, and Batavia Place. Further east along Columbia Street West, near the intersection of Albert Street and Columbia Street West is a high-density mixed-use development with five (5) towers. These medium- to high-rise developments are generally catered to student housing given the proximity to both the University of Waterloo and Wilfred Laurier campuses.

The Subject Property has excellent accessibility to public transit infrastructure, notably the Region's Light Rail Transit (LRT) system. The Site is within walking distance of two (2) ION stations (or MTSAs), being the University of Waterloo Station to the south and the Research and Technology Station to the north. The University of Waterloo Station is approximately 375 metres south of the Subject Property and within an eight (8) minute walk via Columbia Street West and the Laurel Trail. To the North of the Subject Lands, the Research and Technology Station is located approximately 700 metres from the Subject Property and within a twelve (12) minute walk via Columbia Street West and the Laurel Trail. Though the Site is within 800 metres of two (2) MTSAs, the Subject Lands are formally recognized as being within the Research and Technology Station MTSA boundaries, as per the City Official Plan. The LRT system provides access between Conestoga Mall and Fairview Mall, with planned future expansions extending service into Cambridge.

A Grand River Transit (GRT) bus stop (Columbia / Laurel Trail) is located directly in front of the Site, providing access to Route 9 (Lakeshore). Moreover, the recently constructed bus terminal in the East Campus of the University of Waterloo is located just south of the subject lands and is within a five (5) minute walk of the Site. The terminal provides local transit connections via Grand River Transit (GRT) to routes 201, 9, 13, 19, 30, 31, and 91, and intercity transit connections via GO Bus Transit.

The Subject Lands are also well connected to the active transportation network. The Subject Lands are adjacent to the Laurel Trail, which provides active transportation connections from Uptown Waterloo to Columbia Lake and connects to other major trails in the Region including the Trans Canada Trail. The surrounding streets also offer dual sidewalks and/or multi-purpose pathways, connecting the Site to local streets and nearby amenities. Additionally, several painted bike lanes on surrounding streets and nearby multi-use pathways enable cycling trips to and from the Subject Lands.

Based on the context of the surrounding area, it is our opinion the proposed mixed-use development represents a contextually appropriate intensification within a rapidly evolving and

diverse urban node in the City of Waterloo. Overall, the proposed development represents a logical and desirable intensification of the Subject Lands. It capitalizes on existing infrastructure, aligns with surrounding land uses, and supports broader municipal and regional planning objectives related to transit-oriented development, housing choice, and compact urban form. The development will contribute positively to the ongoing transformation of this dynamic node, enhancing vibrancy and reinforcing its role as a key growth area within the City of Waterloo.

The following aerial imagery shows existing buildings located on Columbia Street West within close proximity to the site (Figure 4, below).

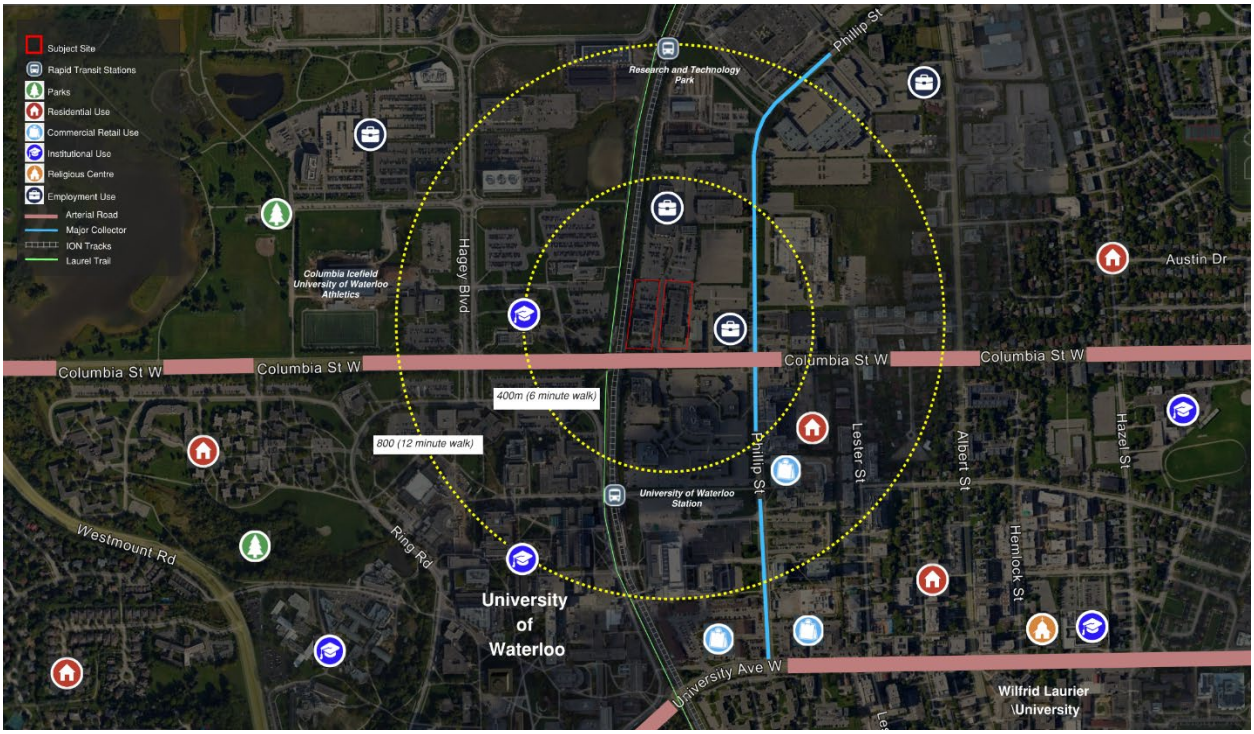


Figure 4: *Neighbourhood Context Map (Source: Region of Waterloo GIS Portal)*

4. PROPOSAL DETAILS

a) Original Proposal - May 2025

The original development concept, which was the basis for the original OPA and ZBA, contemplated a comprehensive, master-planned mixed-use community to be implemented over five (5) phases across the Subject Lands. The proposal envisioned five (5) high-rise, mixed-use towers ranging in height from 37 to 41 storeys, supported by ground-floor commercial and retail uses and a range of indoor and outdoor amenity spaces.

In total, the original concept proposed 2,438 dwelling units comprising 3,206 bedrooms across the five (5) phases, reflecting a high-density, transit-supportive form of development consistent with the Site's proximity to the University of Waterloo and higher-order transit.

A total of approximately 1,532 m² of commercial and retail floor area was proposed as part of the original concept. These non-residential uses were intentionally concentrated along primary building frontages and key pedestrian desire lines, particularly along Columbia Street West, to support an active streetscape, enhance pedestrian comfort, and provide daily convenience-oriented services for residents, students, and visitors.

The buildings for Phases 1 and 3 were positioned along the Columbia Street West frontage to frame the public street and establish a strong urban edge. Between these two buildings, the original concept proposed a centrally located Privately Owned Publicly Accessible Space (POPS) measuring approximately 1,896 m². This space was intended to function as a publicly accessible green gathering area and a focal point of the development, contributing to placemaking objectives and providing visual relief along the street corridor. The Phase 2 tower, proposed at 41 storeys, was located immediately north of the POPS.

The remaining towers were arranged to support a coherent built form composition and an appropriate transition across the Site. Specifically, Phase 1, Phase 2, and Phase 3 were each proposed at 41 storeys, while Phases 4 and 5 were proposed at 37 storeys.

b) Feedback on Original Proposal

Following the submission of the original OPA and ZBA applications, an initial review of the applications and the applications being deemed complete for the purposes of the *Planning Act*, the applications were circulated to internal City departments, agencies, and the public for initial review and comment. An informal meeting of Council was held by the City on July 14, 2025, where the applications were introduced to City Council formally.

Through this process, City staff provided a range of comments intended to refine the proposal, improve its alignment with emerging policy directions, and address urban design, land use, and implementation considerations associated with large-scale development within an MTSA. Key themes emerging from this feedback are summarized below and informed the evolution of the revised development concept described in the following subsections:

1) **Privately Owned Publicly Accessible Space (POPS):** City staff expressed support, in principle, for the inclusion of a POPS on the Subject Lands as a means of contributing to publicly accessible open space. Staff requested that consideration be given to relocating the POPS closer to the Columbia Street West frontage to improve visibility, accessibility, and integration with the public realm. It was noted that, if the POPS were unencumbered by underground servicing infrastructure, the City may be open to accepting the space as a land dedication, which could reduce parkland cash-in-lieu requirements and transfer long-term maintenance responsibilities to the City. Staff also identified that reconfiguring the POPS could create opportunities to simplify internal east–west connections and improve overall site efficiency.

2) **Building Heights:** City staff indicated they were not, in principle, opposed to building heights exceeding 30 storeys within this MTSA, however, staff noted that a preference was expressed for a clearer hierarchy of heights and potentially lower heights for select phases, including the initial phase of development, to achieve better skyline articulation and transition.

3) **Non-Residential Uses:** City staff requested that the amount of non-residential floor area be increased to better support a mixed-use development and retain employment opportunities within the Station Area. Staff recommended exploring additional non-residential uses within podium levels, including live-work units and employment-oriented spaces, such as office units.

4) **Amenity Space and Landscaped Open Space:** Staff requested clarification on the methodology used to calculate required amenity space and identified that the original proposal may be slightly deficient. The applicant was encouraged to explore opportunities to provide additional indoor and outdoor amenity space throughout the development to better support the proposed density.

5) **Zoning Framework:** The original proposal sought approval under a Residential Mixed Use (RMU) zoning framework. City staff suggested that the subject lands may be more appropriately zoned under the new Station Area Mixed Use (SAMU) zones introduced through the City's Official Plan Review (which has since been approved by the Province). Staff noted that while the two zoning frameworks are largely aligned, the SAMU zone would better reflect the Site's location within a MTSA and support long-term implementation.

c) Resubmission No. 1 – February 2026

In response to comments received on the original development applications, the applicant and consulting team prepared a revised development concept that formed the basis of Resubmission No. 1 in February 2026. Like the original proposal, the revised concept continued to contemplate a comprehensive, multi-phase mixed-use development implemented over five (5) phases and two (2) properties. The 170 Columbia Street West lands comprised Phases 1 and 2, while the 180 Columbia Street West lands comprised Phases 3, 4 and 5.

The revised development consisted of five (5) high-rise, mixed-use towers ranging from 25 to 35 storeys, representing a reduction from the 37- to 41-storey towers contemplated through the original submission. Ground-floor retail and office uses were incorporated throughout the development, together with indoor and outdoor amenity spaces associated with each building. In total, Resubmission No. 1 proposed 1,968 dwelling units, comprising of 2,993 bedrooms, across the five (5) phases.

A total of approximately 1,248 m² of retail and office space was proposed. This included 302 m² of retail space within Phase 1, 266 m² of office space within Phase 2, 288 m² of retail space within Phase 3, 264 m² of convertible retail/office space within Phase 4, and 128 m² of office space within Phase 5. Retail uses were generally concentrated closer to the Columbia Street West frontage to support street activation and visibility, while office uses were generally located within the interior and northerly portions of the Subject Lands.

As part of Resubmission No. 1, the Phase 1 tower was repositioned to the north of a consolidated Common Outdoor Area directly fronting Columbia Street West. Through further consideration of servicing and implementation constraints, the POPS contemplated through the original submission was replaced by this Common Outdoor Area. Although the space was to remain privately owned due, in part, to subsurface servicing infrastructure, the applicant contemplated allowing public access for recreational use. At that time, parkland dedication was proposed to be addressed through cash-in-lieu.

Collectively, the February 2026 revisions represented a direct response to the principal themes identified through the review of the original applications. With respect to the City's comments regarding the POPS and public realm, the open space was relocated to the Columbia Street West frontage and consolidated into a larger Common Outdoor Area, improving its visibility and relationship with the public street. While municipal dedication was not considered feasible at that time due to servicing constraints, the revised concept contemplated public access over the privately owned space.

With respect to building height and built form, the overall height of the development was reduced, and greater variation was introduced across the five phases. Whereas the original concept proposed towers ranging from 37 to 41 storeys, Resubmission No. 1 introduced a more varied 25- to 35-storey height range, responding to staff's request for a clearer hierarchy of building heights and greater skyline articulation. The overall residential program was correspondingly reduced from 2,438 dwelling units and 3,206 bedrooms to 1,968 dwelling units and 2,993 bedrooms.

The revised proposal also responded to comments regarding non-residential uses by introducing a broader distribution of retail and office space throughout the development. In particular, office uses were added to the development program, while retail uses continued to be concentrated in locations where they could contribute most directly to street and public-realm activation. This provided a more varied mix of uses than contemplated through the original submission and

responded to the City's objective of retaining employment and other non-residential functions within the Station Area.

With respect to amenity space and landscaped open space, Resubmission No. 1 provided greater clarity regarding the location and function of the proposed amenity areas and incorporated indoor and outdoor amenity spaces throughout each phase. The reconfiguration of the Columbia Street West frontage also established a larger consolidated Common Outdoor Area as an organizing element of the 170 Columbia Street West lands.

Finally, the planning and zoning framework for the applications was revised in response to the City's comments regarding the Station Area Mixed Use (SAMU) zoning framework. Rather than continuing to advance the development through the previously proposed Residential Mixed Use zoning approach, Resubmission No. 1 was revised to use the applicable SAMU Zone as the base zoning framework, with site-specific provisions identified where necessary to accommodate the proposed development.

d) Feedback on Resubmission No. 1

Following the February 2026 resubmission, the revised materials were circulated for further review by City staff and commenting agencies. The second circulation confirmed that many of the changes introduced through Resubmission No. 1 represented positive refinements to the development, however, additional comments were provided that informed further revisions to the master plan and supporting technical work. The principal themes arising from this review are summarized below:

1) **Non-Residential Uses:** City staff continued to emphasize the importance of providing an appropriate amount and mix of non-residential floor area given the Site's Station Area Mixed-Use designation and location within a Major Transit Station Area. In particular, staff requested further consideration of opportunities to increase the employment and commercial component of the development and to demonstrate how the proposal responds to the applicable SAMU zoning requirements for non-residential uses.

   In response, the applicant undertook a comprehensive review of the non-residential program and substantially increased the amount of retail and office space proposed through Resubmission No. 2. A detailed methodology was also prepared to establish an appropriate non-residential floor area requirement having regard to the comparatively smaller average residential unit size proposed within the development, which is discussed further below in Section 4.e.v) of this Report.

2) **Parkland Dedication and Open Space:** Further discussions with City staff focused on the preferred approach to parkland dedication and the role of the previously proposed Common Outdoor Amenity Area along Columbia Street West. Through these discussions, the previous approach of maintaining the space in private ownership, rather than providing a formal municipal parkland dedication, was reconsidered.

The master plan was subsequently revised to establish a dedicated municipal parkland block at the north end of the 170 Columbia Street West lands. To accommodate the park block, Phases 1 and 2 were shifted further south. The distribution of common outdoor areas was also reconsidered, including relocating the common outdoor area on the 180 Columbia Street West lands from Phases 4 and 5 to Phases 3 and 4. Collectively, these changes provide a more deliberate distribution of public and common open spaces throughout the overall master plan.

3) **Pedestrian Wind Conditions:** Urban Design staff requested that an updated Pedestrian Level Wind Study be completed through the rezoning process rather than deferred to the future Site Plan Approval stage. This was particularly important given that the revised building locations and massing introduced through Resubmission No, 1 had altered the wind environment assessed through the original study. Staff sought confirmation that appropriate pedestrian comfort and safety conditions could be achieved at grade and that any significant mitigation requirements could be identified at this stage of the planning process.

   In response, an updated Pedestrian Level Wind Study was completed based on the revised five-tower configuration. The updated assessment confirms that appropriate pedestrian wind conditions can be achieved, subject to localized mitigation measures at identified locations. The current Landscape Plan also incorporates a number of wind mitigation measures, including fencing and strategic landscaping around building corners, entrances and outdoor amenity areas. Details of the Wind Study are summarized in Section 8 of this Report.

4) **Other Technical and Site-Specific Matters:** The second circulation also identified a number of more detailed matters requiring additional technical analysis or clarification, including transportation and access, municipal servicing and stormwater management, land use compatibility and noise, railway vibration and safety, and the proposed reduced setback from the adjacent railway corridor.

   In response, the applicant and consulting team completed a comprehensive update to the supporting technical submission, including revised transportation, servicing, wind, noise and land use compatibility studies, together with a new rail safety and risk assessment specifically addressing the proposed railway setback. These studies informed the current Site plan and demonstrated that the identified technical matters can be appropriately addressed through the proposed design, identified mitigation measures, and subsequent detailed design where required.

These comments and subsequent discussions with City staff formed the basis for Resubmission No. 2. While the overall five-phase mixed-use development framework established through Resubmission No. 1 has been maintained, the current proposal incorporates targeted revisions to the land use mix, parkland and open space framework, site organization, and supporting technical strategies in response to the second circulation comments.

e) Resubmission No. 2 – August 2026 (Current Plan)

Resubmission No. 2 represents a further refinement of the development concept in response to comments received through the second circulation and subsequent discussions with City staff. The overall development framework remains consistent with Resubmission No. 1, consisting of five (5) mixed-use buildings developed across the two (2) Subject Lands. Phases 1 and 2 are located at 170 Columbia Street West, while Phases 3, 4 and 5 are located at 180 Columbia Street West.

The current proposal comprises a total of 1,907 dwelling units and 2,889 bedrooms, representing a further reduction from the 1,968 dwelling units and 2,993 bedrooms proposed through Resubmission No. 1. The proposed buildings continue to range in height from 25 to 35 storeys, maintaining the varied height profile established through the previous resubmission.

A significant refinement to the current proposal is the reorganization of the 170 Columbia Street West lands to accommodate a dedicated municipal parkland block at the north end of the property. To facilitate this change, Buildings 1 and 2 (Phases 1 and 2) have been shifted further south. This represents an evolution from the POPS and privately owned open-space approaches considered through the previous submissions and responds directly to discussions with City staff regarding the provision of dedicated municipal parkland.

The current proposal also substantially increases the amount of non-residential floor area provided throughout the development. A total of approximately 2,967 m² of non-residential floor area is proposed, comprising approximately 740 m² of retail space, 1,963 m² of office space and 264 m² of flexible retail/office space. This represents a substantial increase from the approximately 1,248 m² contemplated through Resubmission No. 1 and strengthens the mixed-use and employment function of the development.

Figure 5 (p. 13 below), shows the revised Site Plan prepared by AAA Architects Inc. submitted as part of this application package.

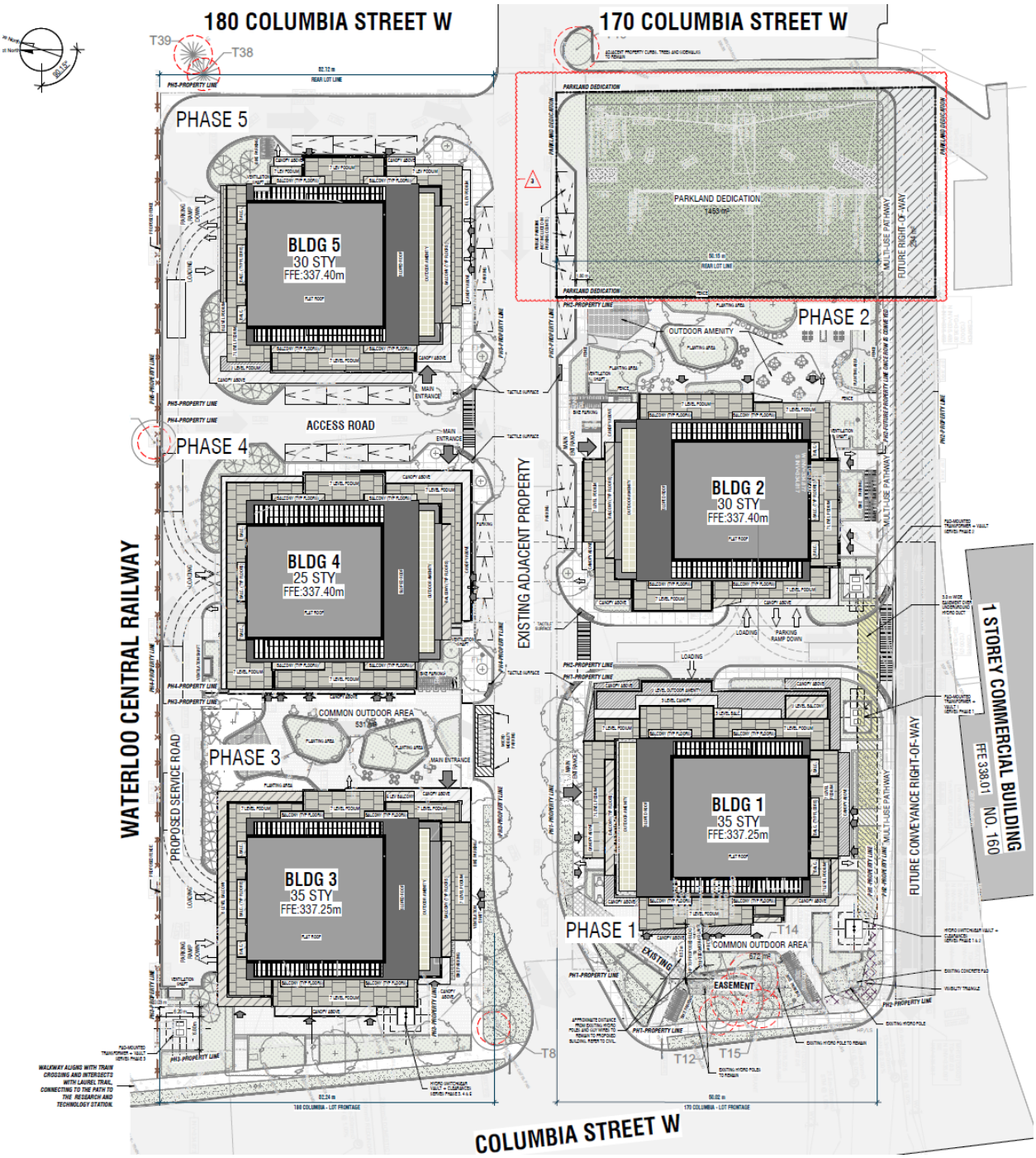


Figure 5: *Revised Site Plan prepared by AAA Architects Inc.*

i. Unit Breakdown

The revised development proposal contemplates a total of 1,907 dwelling units and 2,889 bedrooms, as detailed in the table below. A broad range and mix of unit types, including bachelor, one-, two-, and three-bedroom units, are contemplated to be included in the overall development.

UNIT TYPE/PHASE	TOTAL UNITS	TOTAL BEDROOMS
PHASE 1		
Bachelor	84	84
1 Bedroom	145	145
2 Bedroom	205	410
3 Bedroom	5	15
	439	**654**
PHASE 2		
Bachelor	27	27
1 Bedroom	176	176
2 Bedroom	176	352
3 Bedroom	0	0
	379	**555**
TOTAL 170 COLUMBIA	**818 units**	**1,209 bedrooms**
PHASE 3		
Bachelor	109	109
1 Bedroom	127	127
2 Bedroom	207	414
3 Bedroom	0	0
	443	**650**
PHASE 4		
Bachelor	60	60
1 Bedroom	84	84
2 Bedroom	124	248
3 Bedroom	0	0
	268	**392**
PHASE 5		
Bachelor	94	94
1 Bedroom	24	24
2 Bedroom	260	520
3 Bedroom	0	0
	378	**638**
TOTAL 180 COLUMBIA	**1,089 units**	**1,680 bedrooms**
GRAND TOTAL	**1,907 units**	**2,889 bedrooms**

ii. Access, Circulation, and Parking

The five (5) phases are organized around an interconnected internal circulation system that provides access to the individual buildings, parking facilities, loading areas and the proposed municipal parkland. Access to the development continues to be provided from Columbia Street West, with the internal circulation system designed to support safe and efficient movement through the Site while minimizing conflicts with the pedestrian realm.

A proposed 9.0-metre right-of-way is maintained along the eastern portion of the 170 Columbia Street West lands. In addition to providing circulation through the development, this connection is intended to provide access toward the proposed parkland block and preserve the opportunity for longer-term connectivity with adjacent lands should redevelopment of the broader block occur.

The current plan therefore continues to consider both the immediate operational requirements of the development and the City's longer-term connectivity objectives.

Vehicular parking is primarily accommodated within underground parking facilities, with limited parking provided at grade where appropriate. A total of 409 vehicular parking spaces is proposed across the overall development, comprising of 100 spaces within Phase 2, 90 spaces within Phase 3, 108 spaces within Phase 4, and 111 spaces within Phase 5. No permanent parking supply is proposed within Phase 1 itself. To support the initial occupancy of Phase 1, temporary surface parking is anticipated to be provided on the lands to the rear of the Phase 1 building until such time as construction of Phase 2 commences. The specific configuration, number of spaces, and associated design of this temporary parking area will be determined through the future Site Plan Application for Phase 1. Upon commencement of Phase 2, the temporary parking area would be removed to facilitate construction and implementation of the ultimate master plan. The development also identifies 45 visitor parking spaces within the permanent parking supply, which are intended to be shared with the non-residential uses.

Parking garage entrances, loading facilities, waste collection areas and other service functions are generally incorporated into the building podiums and located away from the primary Columbia Street West frontage wherever possible. This approach limits their visibility from the public realm and allows the Columbia Street West frontage and principal outdoor spaces to remain focused on pedestrians, landscaping, building entrances and active uses.

iii. Bicycle Parking Spaces

The proposed development provides a substantial bicycle parking supply that reflects the site's location within a Major Transit Station Area and proximity to the ION LRT, University of Waterloo and surrounding active transportation network.

A total of 1,234 bicycle parking spaces is proposed across the five (5) phases. This includes 1,212 residential bicycle parking spaces, consisting of 1,130 Type A spaces located within secure bicycle storage rooms and 82 Type B outdoor short-term spaces. An additional 22 Type A bicycle parking spaces are provided for the proposed non-residential uses.

Bicycle parking is distributed throughout the development to provide convenient access for residents, employees and visitors and includes a combination of single and stacked bicycle parking configurations. The significant bicycle parking supply supports reduced reliance on private automobiles and is consistent with the transit-oriented nature of the proposed development.

It should be noted that, following the submission of the original applications and the applications being deemed complete in May 2025, the City approved Housekeeping Zoning By-law Amendment No. 2025-078 on November 17, 2025, which introduced amendments to parking provisions, and most notably, bicycle parking provisions of Zoning By-law 2018-050. Among the changes were revised dimensional standards for bicycle parking spaces and associated access. Notably, the amendments increased the minimum vertical clearance applicable to stacked bicycle parking from 2.2 metres to 3.8 metres, increased the required access aisle width for stacked bicycle parking from 1.75 metres to 2.5 metres, and introduced separate dimensional

requirements for horizontal and vertical wall-mounted bicycle parking spaces, where the previous regulations did not distinguish between these configurations.

The proposed bicycle parking facilities were originally designed based on the zoning standards that were in effect when the applications were submitted and deemed complete. Accordingly, site-specific relief is requested to permit the development to continue to utilize the previously applicable bicycle parking dimensional standards. The requested relief relates to the dimensions and configuration of the bicycle parking facilities rather than the overall provision of bicycle parking and will not compromise their intended functionality. The proposed spaces will continue to provide appropriate and usable bicycle storage for future residents and users while allowing the development to maintain the significant bicycle parking supply contemplated through the original design. In this regard, the requested site-specific provisions represent an appropriate response to a regulatory change that occurred after the applications were submitted and deemed complete, while continuing to support the City's broader active transportation and transit-oriented development objectives.

iv. Common Amenity Areas

The proposed development incorporates a range of indoor and outdoor amenity spaces distributed throughout the five (5) phases. These spaces are provided at ground, podium and upper levels and are intended to accommodate a variety of recreational, social and passive activities for future residents.

Based on the current architectural plans, approximately 4,657 m² of indoor and outdoor building amenity space is provided across the five (5) phases. In addition, approximately 1,203 m² of Common Outdoor Area is provided at grade, comprising of approximately 672 m² associated with Phase 1 and 531 m² between Phases 3 and 4. Phase 2 also incorporates approximately 412 m² of ground-level outdoor amenity area.

The organization of these spaces has been further refined through Resubmission No. 2. On the 180 Columbia Street West lands, the Common Outdoor Area previously located between Buildings 4 and 5 has been relocated to between Buildings 3 and 4. In combination with the Common Outdoor Area associated with Phase 1, this creates an alternating or “zig-zag” pattern of larger outdoor spaces as one moves through the overall development from south to north. The revised arrangement provides a more deliberate distribution of common open spaces and strengthens their relationship with the surrounding buildings.

The approach to public parkland has also changed substantially from the previous submissions. The original proposal contemplated a POPS along Columbia Street West, while Resubmission No. 1 transitioned this space to a privately owned Common Outdoor Amenity Area. Following further discussions with City staff, Resubmission No. 2 now provides for formal municipal parkland dedication at the north end of the 170 Columbia Street West lands. Phases 1 and 2 have consequently been shifted south to accommodate this dedicated park block.

The current plan identifies approximately 1,463 m² of parkland dedication, together with approximately 294 m² associated with the future right-of-way, for a combined area of approximately 1,757 m². The proposed 9.0-metre right-of-way along the eastern portion of 170

Columbia Street West provides access toward the park and preserves opportunities for broader future connectivity.

Overall, the combination of dedicated municipal parkland, Common Outdoor Areas and building-specific indoor and outdoor amenity spaces establishes a comprehensive open-space network that responds to both the recreational needs of future residents and the broader public realm objectives for the site.

v. Non-Residential Uses

The current development proposal incorporates non-residential component intended to complement the residential uses and reinforce the mixed-use and employment function of the Subject Lands within the Research and Technology MTSA. Through Resubmission No. 2, the proposed non-residential Building Floor Area has increased significantly from approximately 1,248 m² to 2,967 m², comprising approximately 740 m² of retail space, 1,963 m² of office space, and 264 m² of flexible retail/office space. Approximately 505 m² is proposed at 170 Columbia Street West and 2,462 m² at 180 Columbia Street West, with retail uses generally located to contribute to public realm activation and office uses providing a significant employment component within the development.

The amount of non-residential floor area has been informed by discussions with City staff and consideration of Policy 10.5(12) of the Official Plan, which provides that developments containing greater than 1,000 residential units should accommodate 2 m² or more of commercial, employment and/or community uses for every residential unit proposed. Given the residential composition of the development, the applicant has developed an alternative methodology that more proportionately relates the required non-residential component to the overall scale of residential development.

The proposed 1,907 dwelling units comprise approximately 92,911 m² of Habitable Floor Space. Research regarding residential unit sizes within the market area identified an average apartment size of approximately 62.7 m². Applying this benchmark to the proposed Habitable Floor Space results in an equivalent residential unit count of approximately 1,483 units and, when the 2 m² per unit standard is applied, a non-residential requirement of approximately 2,966 m². The proposed 2,967 m² of non-residential Building Floor Area therefore satisfies this proportional methodology when the Subject Lands are considered comprehensively. This approach recognizes that developments containing a similar amount of residential floor area may comprise different numbers of dwelling units depending on the particular unit mix and configuration, and therefore provides a consistent relationship between the overall scale of residential development and the corresponding non-residential component.

While the 62.7 m² benchmark establishes the basis for determining the overall non-residential component, 170 and 180 Columbia Street West will continue to constitute two (2) separate parcels for zoning purposes. The non-residential uses are also intentionally distributed differently between the two (2) properties, reflecting the proposed phasing and ultimate land use composition of the master plan. Approximately 505 m² of new non-residential floor area will be provided within Phases 1 and 2 at 170 Columbia Street West, with the balance concentrated within Phases 3, 4 and 5 at 180 Columbia Street West, including a significant office component within Phase 4.

This distribution is also appropriate having regard to the sequencing of development. Phases 1 and 2 are anticipated to proceed in advance of the redevelopment of 180 Columbia Street West. During this period, the existing office building at 180 Columbia Street West will remain in place and continue to accommodate employment uses. Accordingly, the development of 170 Columbia Street West will not result in the removal of the existing employment function on the Subject Lands. As the development progresses and 180 Columbia Street West is subsequently redeveloped, the balance of the new commercial and employment floor area will be introduced, ultimately providing the full 2,967 m² contemplated across the master plan.

To implement this approach while ensuring that each property independently complies with the Zoning By-law, separate site-specific rates are proposed for the two (2) properties. At 170 Columbia Street West, encompassing Phases 1 and 2, a minimum of 2 m² of non-residential Building Floor Area for every 158.7 m² of Habitable Floor Space is proposed. At 180 Columbia Street West, encompassing Phases 3, 4 and 5, a minimum of 2 m² of non-residential Building Floor Area for every 43 m² of Habitable Floor Space is proposed. Based on the current development statistics, these rates correspond with approximately 505 m² and 2,458 m² of required non-residential Building Floor Area, respectively, compared with 505 m² and 2,462 m² proposed.

The differing parcel-specific rates represent the implementation mechanism for distributing the overall non-residential component between the two (2) properties, rather than separate methodologies for determining the appropriate overall amount of non-residential development. The overarching planning rationale remains based on the 62.7 m² market-area benchmark, which results in approximately 2,966 m² of non-residential floor area across the development. This approach allows each property to independently satisfy its applicable zoning requirement, appropriately reflects the intended location and timing of commercial and employment uses, and facilitates phased implementation while maintaining the mixed-use and employment objectives of the Station Area.

vi. Phasing or Development Implementation Strategy

The overall development continues to be contemplated as a five-phase project, allowing construction to proceed incrementally while maintaining a coordinated master-plan approach across 170 and 180 Columbia Street West. The conceptual Block Plan and overall site design continue to recognize the relationship between the Subject Lands and the potential longer-term redevelopment and connectivity of surrounding properties.

Staging of Development

Phase 1 will establish the first building at 170 Columbia Street West and is proposed at 35 storeys, containing 439 dwelling units and 654 bedrooms. The phase will also establish the Common Outdoor Area along the Columbia Street West frontage and the initial portion of the internal circulation system. Phase 1 is currently contemplated as a purpose-built rental apartment building.

Phase 2 will complete the development of the 170 Columbia Street West lands through a 30-storey building containing 379 dwelling units and 555 bedrooms. The implementation of Phase 2 will also establish the northerly portion of the site circulation system and facilitate the relationship

between the development and the municipal parkland block at the north end of the property. The Phase 2 building is currently contemplated as a condominium.

Phases 3 through 5 will comprise of the development at the 180 Columbia Street West lands and are presently contemplated to form part of a single condominium development. These phases will contain buildings ranging between 25 and 35 storeys and collectively provide 1,089 dwelling units and 1,680 bedrooms. Development is anticipated to generally progress from Columbia Street West northward, with undeveloped portions of the property available for construction staging and related activities during build-out. The phasing strategy allows each component of the development to proceed in an orderly manner while ensuring that required servicing, access, parking, amenity areas and other infrastructure can be coordinated with the progressive build-out of the overall master plan. Figure 6 below illustrates the revised master/staging plan.

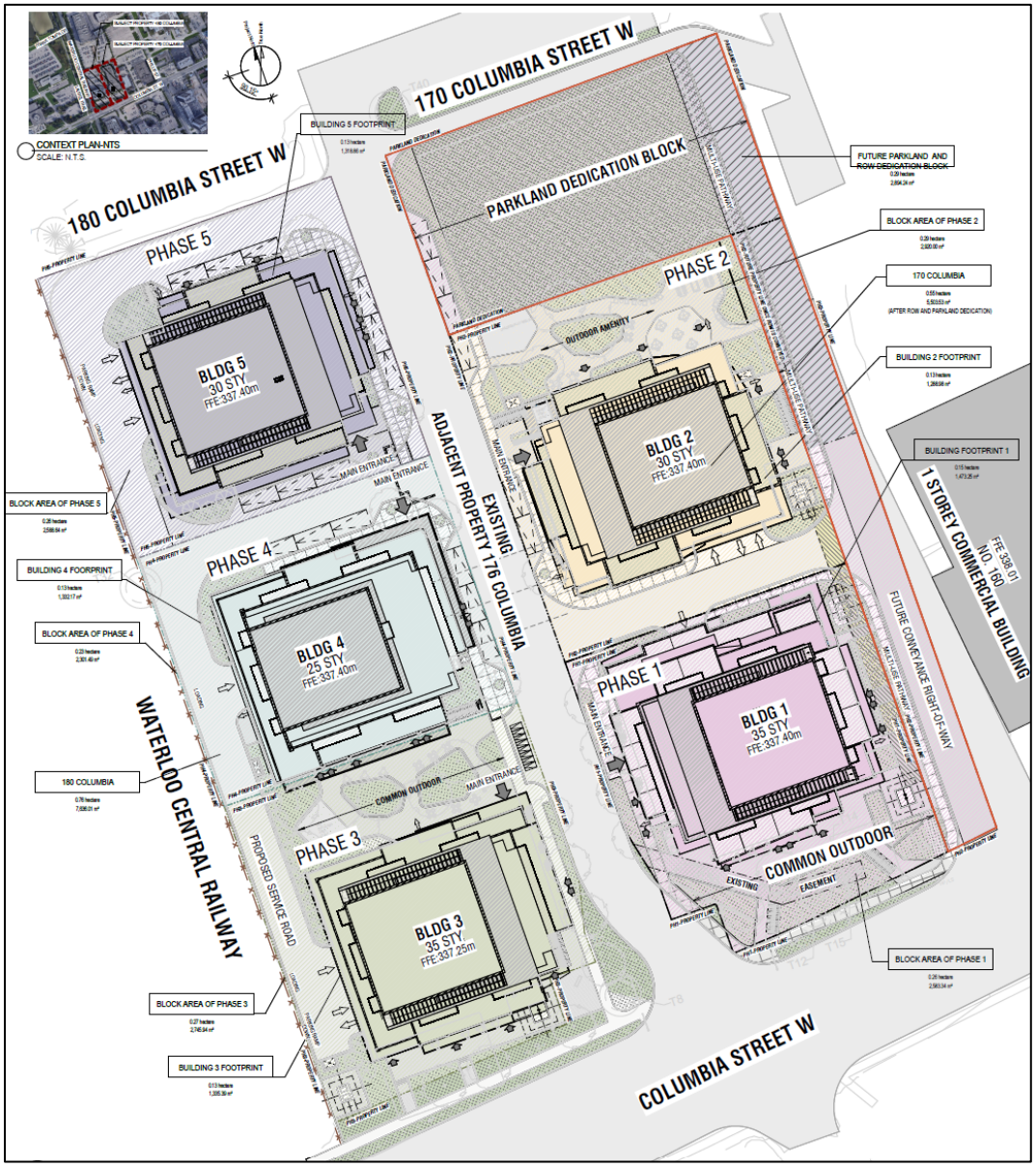


Figure 6: *Revised Master / Staging Plan prepared by AAA Architects Inc.*

Development Applications Required to Facilitate Project Phasing

To facilitate the phased development of the Subject Lands, a number of corresponding planning applications will be required. While the type of planning application required will depend on several considerations (including proposed tenure / ownership), the current anticipated planning applications are summarized in the following table.

PHASE	APPLICATIONS REQUIRED
Phase 1	• OPA / ZBLA Approval • Site Plan Application • Consent Application or Vacant Land Condominium application to establish lot lines (between Phase 1 and 2) and amend existing easements/development agreements as required • Minor Variance Application if site-specific relief is identified to be required through the corresponding site plan process
Phase 2	• OPA / ZBLA Approval • Site Plan Application • Consent Application to amend existing easements/development agreements as required • Minor Variance Application if site-specific relief is identified to be required through the corresponding site plan process • Condominium application to allow for sale of individual units
Phases 3-5	• OPA / ZBLA Approval • Site Plan Application • Consent Application to amend existing easements/development agreements • Minor Variance Application if site-specific relief is identified to be required through the corresponding site plan process • Phased Condominium application(s)

Easements and Development Agreements

The Subject Lands were developed historically as part of a broader business park along with 176 Columbia Street West to the north. Of note, both existing properties share a mutual drive aisle with 176 Columbia Street which runs between 170 and 180 Columbia Street. Given the historic development of this broader block, there are a number of existing easements in place to the mutual benefit of the Subject Lands and 176 Columbia with regards to:

- Mutual access (vehicular and pedestrian);
- Electrical servicing;
- Stormwater Management; and
- Water and wastewater servicing.

Through the phased redevelopment of the Subject Lands, it is anticipated that existing infrastructure located on site will need to be upgraded and potentially relocated to accommodate the proposed development. As described in the table above, where required, these existing development agreements and easements are proposed to be amended through future consent applications, which will require consent / mutual cooperation by both the owners of 170-180 Columbia Street and 176 Columbia Street, as well as the City of Waterloo.

In addition to the potential modification of these existing easements and development agreements, it is anticipated that additional easements may be needed to provide access rights

over the proposed drive aisle, and to allow for access between the phases as a master planned development. The extent and effect of these easement rights and required development agreements will be confirmed through the future development approvals identified above.

5. REQUESTED APPROVALS – REVISED

The Official Plan Amendment and Zoning By-law Amendment applications originally submitted in May 2025 have been revised to reflect the current development proposal, comments received through the municipal review process, and changes to the applicable planning framework that have occurred since the original submission. The following sections identify the revised planning approvals requested as part of Resubmission No. 2.

Since the original submission, the Province approved Official Plan Amendment No. 58 (OPA 58) on December 17, 2025, representing Phase 1 of the City of Waterloo's ongoing Official Plan Review. The policies and mapping introduced through OPA 58 are now in full force and effect and designate the Subject Lands “Station Area Mixed-Use”, reflecting their location within a Major Transit Station Area. Accordingly, the original request to redesignate the Subject Lands from “Employment” to “Station Area Mixed-Use” is no longer required.

The requested Official Plan Amendment has therefore been refined to address only the site-specific policy permissions that remain necessary to facilitate the current development proposal. As detailed below, the revised OPA principally seeks site-specific permissions related to the proposed building heights and densities on the 170 and 180 Columbia Street West lands. The previously contemplated site-specific amendment relating to the amount of non-residential floor area is also no longer proposed, as the current development provides 2,967 m² of commercial and employment floor area and appropriately addresses the intent of Policy 10.5(12) through the methodology described in this Report.

The corresponding Zoning By-law Amendment has similarly been updated to reflect the Station Area Mixed Use (SAMU) zoning framework and the current site and building design. The revised ZBA seeks the site-specific permissions necessary to implement the proposed master plan, including matters related to built form, setbacks, amenity areas, parking and bicycle parking, non-residential uses, and other technical and implementation matters necessary to facilitate the proposed comprehensive development.

Importantly, the site-specific Official Plan policies and Zoning By-law provisions are intended to establish a coordinated regulatory framework for the Subject Lands while recognizing 170 Columbia Street West and 180 Columbia Street West as two (2) separate parcels for zoning purposes. The proposal represents a comprehensively planned development that will be implemented incrementally over five (5) phases, with Phases 1 and 2 located on 170 Columbia Street West and Phases 3, 4 and 5 located on 180 Columbia Street West.

The internal boundaries shown between the respective development phases are intended solely to delineate the anticipated phasing and implementation of the development and shall not be considered lot lines for the purposes of applying the Zoning By-law. Accordingly, applicable zoning regulations will be assessed on the basis of each of the two (2) existing parcels as a whole, rather than individually for each phase. Setbacks and separations from lot lines will continue to be measured from the applicable property lines of 170 Columbia Street West and 180 Columbia Street West, as required. This approach appropriately recognizes the coordinated and master-

planned nature of the development while maintaining the two (2) properties as distinct zoning lots and providing flexibility for the phased implementation of development within each parcel.

The requested planning framework therefore provides the flexibility necessary for the long-term implementation of the master plan while ensuring that the overall development remains consistent with the site-specific permissions established through the Official Plan and Zoning By-law Amendment applications.

a) Official Plan Amendment

170 Columbia St W (Phases 1 and 2)

As part of the original OPA application for the Subject Lands, part of the purpose of the OPA was to redesignate the lands as 'Station Area Mixed Use' and to remove the lands from an employment lands designation. As indicated above, as a result of OPA 58, the lands are now designated 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally proposed OPA are no longer required.

To reflect the updated development concept being proposed, and to reflect the heights now contemplated, the applicant is proposing a revised OPA to:

- Amend Schedule 'A6' (Specific Provision Areas) – to establish a 'Specific Provision Area __' to reflect the following provision:
    - Notwithstanding Schedule 'B1' – Height and Density and the policies of this Plan, the maximum building height for Phase 1 shall be 35 storeys, while the maximum building height for Phase 2 shall be 30 storeys.
    - Notwithstanding Policy 10.5(12), the minimum amount of commercial, employment and/or community use floor area shall be calculated at a rate of 2 square metres for every 158.7 square metres of residential unit floor area.

180 Columbia St W (Phases 3 to 5)

As mentioned above, part of the purpose of the original OPA submission was to redesignate the lands as 'Station Area Mixed Use' and to remove the lands from an employment lands designation. As a result of OPA 58, the lands are now designated as 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally proposed OPA are no longer required.

To reflect the updated development concept now being proposed, and to reflect the heights now contemplated, the applicant is proposing a revised OPA to:

- Amend Schedule 'A6' (Specific Provision Areas) – to establish a 'Specific Provision Area __' to reflect the following provision:
    - Notwithstanding Schedule 'B1' – Height and Density and the policies of this Plan, the maximum building height for Phase 3 shall be 35 storeys; the maximum

building height for Phase 4 shall be 25 storeys; and the maximum building height for Phase 5 shall be 30 storeys.

- Notwithstanding Policy 10.5(12), the minimum amount of commercial, employment and/or community use floor area shall be calculated at a rate of 2 square metres for every 43 square metres of residential unit floor area.

b) Zoning By-Law Amendment

To reflect the updated development concept, the applicant is proposing amended ZBA applications for 170 and 180 Columbia Street West, as described below.

170 Columbia St W (Phases 1 & 2)

Rezone the subject property from '(Holding) Business Employment Two A ((H)E2A81)' Zone to '(Holding) Station Area Mixed Use ((H)SAMU-105)' Zone with the following Site-Specific Provisions:

- Permit a minimum of 2 m^2 of non-residential Building Floor Area for every 158.7 square metres of Habitable Floor Space for Phases 1 and 2;
- Permit a Maximum Density of 2,197 bedrooms per hectare for Phases 1 and 2, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.1 metres or 35 storeys for Phase 1, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 9.0 for Phase 1, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (West) of 7.4 metres for Phase 1, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 9.0 for Phase 2, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (West) of 7.5 metres for Phase 2, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Common Outdoor Area dimension of 4.6 metres, whereas the Zoning By-law requires a minimum of 6.0 metres;
- Permit a Maximum Amenity Area of 36% for outdoor rooftop amenity space, whereas the Zoning By-law requires a maximum of 20%; and,
- Permit a Minimum Underground Parking Front Yard Building Line Setback of 1.0 metres, whereas the Zoning By-law requires a minimum of 4.0 metres.
- Permit a Minimum Vertical Clearance for Stacked Bicycle Parking Spaces of 2.2 m, whereas the Zoning By-Law requires a minimum of 3.8 m;
- Permit a Minimum Access Aisle Width for Stacked Bicycle Parking of 1.75 m, whereas the Zoning By-Law requires a minimum of 2.5 m;
- Notwithstanding any provision of this By-law, any regulation requiring a setback or separation from a lot line shall continue to be measured from the applicable lot line of the

lands municipally known as 170 Columbia Street West, as applicable. Internal phasing lines shall not be considered lot lines for the purposes of applying this By-law;

- Notwithstanding the definition of “AMENITY AREA” in this By-law, for the lands subject to this site-specific provision, AMENITY AREA may also include an outdoor area at grade that is designed, built and maintained for the active and/or passive recreational use of residents and their guests, including, but not limited to, outdoor seating and gathering areas, barbeque areas, children's play areas, outdoor exercise and yoga areas, landscaped recreational areas, and similar outdoor amenity uses; and
- That a Holding Provision (H) be applied to the Subject Property for which the following applies:
    - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and
    - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

180 Columbia St W (Phases 3 to 5)

Rezone the subject property from ‘(Holding) Business Employment Two A ((H)E2A81)’ Zone to ‘(Holding) Station Area Mixed Use ((H)SAMU-105)’ Zone with the following Site-Specific Provisions:

- Permit a Minimum Street Line Setback of 0.8 metres for Phase 3, whereas the Zoning By-law requires 4.0 metres;
- Permit a Minimum Side Yard (East) Setback of 1.2 metres for Phase 3, whereas the Zoning By-law requires 3.0 metres;
- Permit a minimum of 2 m^2 of non-residential Building Floor Area for every 43 square metres of Habitable Floor Space;
- Permit a Maximum Density of 2,201 bedrooms per hectare for Phases 3, 4 and 5, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.1 metres or 35 storeys for Phase 3, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 4.5 metres for Phase 3, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 6.7 metres for Phase 4, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 6.6 metres for Phase 5, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Maximum Amenity Area of 35% for outdoor rooftop amenity space, whereas the Zoning By-law requires a maximum of 20%; and,
- Permit a Minimum Setback of 9.0 metres of a railway right-of-way, whereas the Zoning By-law requires a minimum of 15.0 metres; and

- Permit a Minimum Underground Parking Front Yard Building Line Setback of 1.0 metres, whereas the Zoning By-law requires a minimum of 4.0 metres;
- Notwithstanding any provision of this By-law, any regulation requiring a setback or separation from a lot line shall continue to be measured from the applicable lot line of the lands municipally known as 180 Columbia Street West, as applicable. Internal phasing lines shall not be considered lot lines for the purposes of applying this By-law;
- Notwithstanding the definition of “AMENITY AREA” in this By-law, for the lands subject to this site-specific provision, AMENITY AREA may also include an outdoor area at grade that is designed, built and maintained for the active and/or passive recreational use of residents and their guests, including, but not limited to, outdoor seating and gathering areas, barbeque areas, children's play areas, outdoor exercise and yoga areas, landscaped recreational areas, and similar outdoor amenity uses; and,
- That a Holding Provision (H) be applied to the subject property for which the following applies:
    - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and
    - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

6. LAND USE PLANNING FRAMEWORK

Land use planning and decision-making related to the same is guided by a range of legislation, policies, and plans set out at the Provincial, Regional, Municipal/City and neighbourhood levels. The following subsections of this Report discuss the land use planning policy framework applicable to the Subject Property and how they have been considered in the proposed development applications.

a) Planning Act

The *Planning Act*, R.S.O. 1990 establishes the legal framework for land use planning in Ontario, and includes legislative direction with regards to Official Plans, Zoning By-Laws and Site Plan Approvals among other planning tools. The *Planning Act* also provides the Minister of Municipal Affairs and Housing with policy making authority to issue policy statements and plans to guide land use planning and development in the province, which is the basis for the Provincial Planning Statement.

The following subsections of this Report provides an overview of the *Planning Act* as it applies to the proposed development and commentary relating to how the proposed development adheres to the direction set out therein.

i. Matters of Provincial Interest

Section 2 of the *Planning Act* sets out various 'Matters of Provincial Interest'. In carrying out their responsibilities under the *Planning Act*, decision-makers must have regard to these Matters of Provincial Interest. The table below outlines the Matters of Provincial Interest set out in Section 2 of the *Planning Act* and commentary regarding how each matter has been considered, where applicable.

Provincial Interest	Demonstration of Regard
a) the protection of ecological systems, including natural areas, features and functions;	Not applicable. The Subject Property does not contain any ecological systems or natural areas.
b) the protection of the agricultural resources of the Province;	Not applicable. The Subject Property is not an agricultural use.
c) the conservation and management of natural resources and the mineral resource base;	Not Applicable. The Subject Lands do not contain natural resources or a mineral resource base.
d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	Not Applicable. The Subject Lands do not contain significant architectural, cultural, historical, archaeological or scientific interest or features.

e) the supply, efficient use and conservation of energy and water;	As discussed in the Functional Servicing & Stormwater Management Report prepared by WalterFedy, the proposed development will connect to existing services making efficient use of existing infrastructure.
f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The proposed development represents context appropriate intensification that will connect to existing communication and physical infrastructure, representing the wise use of municipal and agency infrastructure.
g) the minimization of waste;	The proposed development is proposed to be connected to existing municipal infrastructure and does not propose the expansion of infrastructure. Internal garbage chutes and waste management systems will be implemented within each building.
h) the orderly development of safe and healthy communities; h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	The Proposed Development provides much needed housing units to the neighbourhood, supporting the further development of the community. It also supports healthy living by providing outdoor amenity areas, being within walking distance of public transit (notably an MTSA), and by providing bicycle parking. The proposed development will meet the standards in the AODA and the OBC.
i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;	The proposed development will support the adequate provision and distribution of educational, health, social, cultural, and recreational facilities by contributing to a complete community within walking distance of major institutions, parks, trails, and transit, while also enabling population growth that supports the viability and expansion of these services.
j) the adequate provision of a full range of housing, including affordable housing;	The development includes a range of bachelor, one-, two-, and three-bedroom units, contributing to the provision of a full range of housing options in the community and greater housing affordability in the area.
k) the adequate provision of employment opportunities;	The proposed non-residential uses will provide employment opportunities across the development, as both retail and office units are provided on the ground floors of each building.
l) the protection of the financial and economic well-being of the Province and its municipalities;	The proposed development will be subject to various municipal fees, including development charges, planning and development application and review fees, and development securities.

m) the co-ordination of planning activities of public bodies;	The use and development of the Subject Property is guided by a range of Provincial, Regional, and City policies and regulations.
n) the resolution of planning conflicts involving public and private interests;	A statutory public meeting will be held as part of the approval process to ensure any conflicts are resolved.
o) the protection of public health and safety;	No adverse impacts to public health or safety are anticipated as per the technical studies/reports prepared in support of the proposed development.
p) the appropriate location of growth and development;	The proposed development will facilitate intensification on the Subject Lands which are located within the City's Built-Up Area in a neighbourhood with an existing mix of uses including high-density residential development.
q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The proposed development is planned to accommodate various sustainable design elements. A public transit stop is located within a one (1) minute walk. A GRT and GO bus station, and LRT station are located within an eight (8) minute walk. Bicycle parking is also provided to encourage active forms of transportation.
r) the promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;	As part of the complete application package, an Urban Design Brief has been prepared by Up Consulting Ltd. discussing the design of the building, how it encourages a sense of place and how the design is appropriate within its context and how it will support a high-quality public realm.
s) the mitigation of greenhouse gas emissions and adaptation to a changing climate.	The proposed development will support the mitigation of greenhouse gas emissions and adaptation to a changing climate through its transit-oriented location, integration with active transportation networks, and the incorporation of sustainable building and site design practices.

Based on the foregoing, it is our opinion that the proposed development has regard for the matters of Provincial interest as set out in the *Planning Act*.

b) Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS), 2024 is issued under Section 3 of the *Planning Act* and came into effect on October 20, 2024, replacing the previous version of the PPS, which was issued in 2020, and the A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. Approval authorities, including City of Waterloo Council, in carrying out their responsibilities under the *Planning Act*, are to ensure that their decisions "are consistent with" the PPS.

The PPS builds upon the policy direction expressed in the *Planning Act* ("Matters of Provincial Interest") related to land use planning, which supports the Provincial goal of enhancing the quality of life for all citizens of Ontario. This new streamlined province-wide land use planning policy framework builds upon housing-supportive policies from both previous documents.

The focus of the PPS is building a strong and competitive economy by increasing the supply and variety of housing options, prioritizing compact and transit-supportive design, optimizing investments in infrastructure and public service facilities, recognizing the unique role of Indigenous communities, and directing growth and development within existing urban and rural settlements to protect natural resources for the long-term, including natural areas, water, aggregates and agricultural lands.

The PPS is to be read in its entirety, and applicable policies are to be applied to specific situations/applications. The following table provides a summary of relevant policies of the PPS and describes how the proposed development is consistent with this policy direction.

Section	Policy	Discussion of Consistency
Planning for People and Homes		
2.1.4	To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: a) Maintaining at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and b) Maintaining at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.	a) The proposed development utilizes available lands for higher-density housing, contributing to a diverse housing market that meets evolving community needs. b) As per the Functional Servicing Report prepared by WalterFedy, the proposed development will connect to existing water, wastewater and sanitary servicing systems.
2.1.6	Planning authorities should support the achievement of complete communities by: a) accommodating an appropriate range and mix of land uses, housing options, transportation	The proposed development will contribute to a range and mix of housing options which will support residential growth. It integrates several common amenity spaces, which support

	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; b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.	the creation of complete communities. a) The proposed development consists of a total of 1,907 dwelling units, which includes a range of bachelor, one, two and three-bedroom units. b) The proposed development will be designed to meet or exceed AODA requirements. c) The mix of unit types ensures affordability and diversity, benefiting a broad range of income levels. The inclusion of indoor and outdoor amenity space enhances residents' quality of life, promoting social equity and well-being.
Housing		
2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; b) permitting and facilitating: i. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and	a) The proposed development will contribute to the provision of a range and mix of housing options within the regional market area by delivering a total of 1,907 dwelling units in a high-density built form. The development is expected to include a mix of unit types, aligning with the diverse housing needs of both the Region and City of Waterloo. b) The proposed development facilitates a wide range of housing options and intensification forms in a strategic urban location. The mix of unit types will be well-suited to meet the evolving social, economic, and demographic needs of the community, including housing for students, workers in the nearby Research and Technology Park, and other urban residents. c) The proposed density promotes an efficient use of land,

	ii. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites… 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.	infrastructure, and public service facilities by concentrating residential and commercial uses within a compact urban footprint. The development is in an area currently serviced by municipal infrastructure and in proximity to a variety of amenities and institutional uses. d) The development demonstrates transit-supportive intensification, located within an eight (8) minute walk of the University of Waterloo ION LRT station and twelve (12) minute walk from the Research and Technology Station, in addition to multiple GRT routes.
Settlement Areas		
2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	The proposed development is located within the Region of Waterloo's Built-Up Area and is situated entirely within an MTSA identified in the City of Waterloo Official Plan. The site does not abut any low-rise residential neighbourhoods or other sensitive land uses. Therefore, it does not introduce compatibility concerns often associated with high-density intensification. As an MTSA, this area is specifically planned to accommodate significant infill and high-rise development, in alignment with Provincial, Regional, and local growth management policies that encourage compact, transit-supportive urban form.
2.3.1.2	Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities; c) support active transportation;	a) The development promotes efficient use of underutilized land that is located within an MTSA and is adjacent to urbanized land containing a mix of uses. b) It is located within a well-serviced area and can connect to existing municipal infrastructure. c) The Subject Lands are adjacent

	d) are transit-supportive, as appropriate; and e) are freight-supportive.	to the Laurel Trail, connecting users of the site to nearby amenities as well as alternative modes of transit. d) The development fosters transit supportive densities to promote the use of existing transit systems in the area. The Subject Lands are located between two (2) LRT stations, as well as near the University of Waterloo's bus terminal, providing access to several GRT routes and GO transit services. e) Not Applicable.
2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.	The mixed-use development supports intensification in a Built-Up Area and supports the achievement of complete communities by providing a range of housing options, common amenities, and retail uses.
Major Transit Station Areas		
2.4.2.2	Within *major transit station areas* on *higher order transit* corridors, planning authorities shall plan for a minimum density target of: 1. 200 residents and jobs combined per hectare for those that are served by subways; 2. 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or 3. 150 residents and jobs combined per hectare for those that are served by commuter or regional rail.	The proposed development, across both sites, has a residential density of approximately 1,452 units per hectare, which significantly contributes to the achievement of the minimum density targets for lands served by light rail transit. Located within an MTSA that is currently characterized by predominantly low-density, auto-oriented employment uses, the proposed development supports the transformation of the area into a more compact, transit-supportive, and complete community, as envisioned by local and provincial planning policy.
2.4.2.3	Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by: 1. planning for land uses and built form that supports the	The proposed development is located within an MTSA. The proposed development and intensification of the Subject Lands is appropriate given its context.

	achievement of minimum density targets; and 2. supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit-supportive and promote complete communities.	
Sewage, Water and Stormwater		
3.6.2	Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.	The proposed development will connect to the existing municipal water and sanitary services available along Columbia Street W.
3.6.8	Planning for stormwater management shall: a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure; d) mitigate risks to human health, safety, property and the environment; e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and	The subject property is proposed to connect to existing storm infrastructure as detailed in the Functional Servicing & Stormwater Management Report prepared by WalterFedy. Detailed stormwater design will be confirmed through the future Site Plan Approvals process.

	g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.	
Public Spaces, Recreation, Parks, Trails and Open Space		
3.9.1	Healthy, active, and inclusive communities should be promoted by: a) planning 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; b) 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.	a) The proposed development will contribute to a healthy, active, and inclusive community by introducing a well-connected public realm that prioritizes safety, accessibility, and social interaction. Public streets and internal pathways will be designed to accommodate pedestrians and persons of all ages and abilities, integrating with the existing transportation network, including the adjacent Laurel Trail. b) The proposed development which includes a common outdoor area as part of Phase 1, Phase 2, and Phase 3, combined with the development's pedestrian connections, contribute to a diverse range of outdoor space.

Based on the foregoing, it is our opinion that the proposed development is consistent with the PPS 2024.

c) Region of Waterloo Official Plan

The Regional Official Plan ("ROP") sets out policy direction to guide land use planning in the Region of Waterloo over a 20-year planning horizon. The Ministry of Municipal Affairs and Housing approved the ROP in 2010. This decision was subsequently appealed to the Ontario Municipal Board, which issued a decision regarding the ROP in June 2015, that allowed the ROP to come into full force and effect. All planning decisions within the Region of Waterloo must conform to the ROP, including the subject applications.

The ROP determines areas for growth and development, sets out population and employment forecasts and density targets, establishes an Urban Boundary, promotes multi-modal transportation options, and sets out policies to protect the Region's valuable environmental and agricultural resources.

On August 18, 2023, Council for the Regional Municipality of Waterloo approved Regional Official Plan Amendment No. 6 ("ROPA 6"), which was the result of the Region's municipal comprehensive review to bring the Regional Official Plan into conformity with the PPS and the Growth Plan. On April 11, 2023, the Minister of Municipal Affairs and Housing approved ROPA 6 with various modifications.

Key changes brought about by ROPA 6 include policy changes to support an intensification-first approach to accommodating growth; extending the planning horizon to the year 2051; establishing a hierarchy of urban areas and nodes/corridors where the majority of growth should be directed; and establishing new intensification targets for area municipalities including the City of Waterloo.

It is further understood that the Region of Waterloo has consolidated the Regional Official Plan to include the amendments made to the Plan as part of ROPA 6. As such, the following subsections of this Report discuss the current policies and designations that apply to the Subject Lands, and which are relevant to the proposed Official Plan and Zoning By-law Amendment applications.

i. Urban Area and Built-Up Area

The Subject Lands are within the 'Delineated Built-Up Area' designation, as per Map 2 (Urban System) in the Regional Official Plan (Figure 7, p.36). The Built-Up Area includes all lands within the built boundary of the Region's Urban Area and Township Areas as of June 16, 2006.

Section 2.C.2 of the ROP outlines the Urban Area Policies. Development within the Urban Area is to be planned and implemented through local official plans, zoning by-laws, and related planning tools in a manner that supports the Regional urban structure and advances sustainability objectives. The policies emphasize compact built form, reduced reliance on private automobiles, and the creation of complete, 15-minute neighbourhoods where daily needs can be met through walking, cycling, and transit.

Urban Area development is expected to contribute to climate change mitigation and adaptation by supporting energy-efficient design, low-carbon development, high-performance building standards, green infrastructure, and increased urban tree canopy. New development is to be fully serviced by municipal water and wastewater systems and designed to protect natural heritage features and water resources.

The policies also prioritize the provision of a diverse mix of housing types, including affordable housing, to accommodate a broad range of household sizes, incomes, and life stages. High-quality urban design, an attractive public realm, cultural heritage conservation, universal accessibility, and public health and safety are key considerations.

Finally, Urban Area development is designed to enhance access to transportation options, public services, parks and open spaces, community facilities, and local food systems, which supports overall community well-being, social inclusion, and economic vitality.

Planning Comment: The Subject Lands are located within the Region's designated Urban Area and are planned to accommodate significant residential intensification. The proposed high-

density, mixed-use development efficiently utilizes serviced urban land and contributes to the Region's growth management objectives by directing population growth to an appropriate urban location.

The development advances the Region's sustainability and climate objectives by promoting a compact urban form that supports walking, cycling, and transit use (due to its proximity to the ION LRT). The scale and density of development support reduced automobile dependence and contribute to lower per-capita greenhouse gas emissions. The proposed development will be fully serviced by municipally owned water and wastewater systems and represents an efficient use of existing urban infrastructure.

The proposal delivers a substantial number of residential units in a variety of unit sizes, contributing to a diverse housing supply within the City of Waterloo. The development is organized around high-quality site design and urban design principles, including pedestrian-oriented building placement, active ground-floor uses where appropriate, and extensive internal pedestrian connections. Buildings are framed by landscaped areas and common outdoor areas that enhance the public realm and improve accessibility for people of all ages and abilities.

The Subject Lands benefit from excellent access to higher-order transit, including the ION LRT, and are well-served by existing pedestrian and cycling infrastructure. The development expands convenient access to a range of transportation options and supports a modal shift toward active transportation.

The proposal incorporates significant common outdoor areas and landscaped spaces that function as shared recreational areas for residents and visitors. These spaces contribute to residents' access to open space and support community well-being.

Based on the foregoing, it is our opinion that the proposed development conforms to the policy direction set out in the ROP for its Urban Area and Built-Up Areas.



Figure 7: *Region of Waterloo Official Plan - Map 2 (Urban System)*

ii. Where and How to Grow

Chapter 2 of the Region of Waterloo Official Plan sets out policy direction as to where and how to grow, and establishes several objectives in that regard:

- Build vibrant 15-minute neighbourhoods with a broad mix of land uses where people can meet their daily needs for goods, services, and employment within a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by taking direct, frequent, and convenient transit;
- Promote an intensification-first approach to development and community-building that focuses on making better use of existing infrastructure and public service facilities, and on protecting the region's valuable water, agricultural and natural heritage systems;
- Advance transformational climate action by supporting a more energy-efficient, compact built form that will enable a modal shift to most trips being made by walking, cycling, and rolling;
- Mitigate and adapt to climate change, improve resilience and reduce greenhouse gas emissions, and contribute to environmental sustainability;
- Integrate and respect Indigenous values, history and cultures in planning for growth and change through respect, trust, and meaningful dialogue;
- Plan in a manner that improves social equity and overall quality of life, including human health, for people of all ages, abilities and incomes;
- Strive to prioritize the voices of children and youth when making decisions around regional investments and operations; and
- Conserve and promote cultural heritage resources to support the social, economic, and cultural well-being of all communities, including First Nations, Métis, Inuit, and other local Indigenous peoples.

Planning Comment: The proposed mixed-use development aligns strongly with the growth management objectives set out in Chapter 2 of the ROP by advancing a compact, complete community model within a strategically located, transit-accessible urban node. The development supports the creation of a vibrant 15-minute neighbourhood by integrating residential, commercial, and public realm elements within walking and cycling distance of key institutional, employment, and recreational destinations, including the University of Waterloo, the Research and Technology Park, and the Laurel Trail. The site's proximity to two (2) ION LRT stations and multiple GRT routes reinforces convenient regional access and supports a shift toward sustainable, low-emission travel modes.

The proposal prioritizes intensification by transforming underutilized lands within the built-up area into a high-density, mixed-use hub, thereby maximizing the use of existing infrastructure and reducing the need for greenfield expansion. The compact built form and large common outdoor areas will contribute to both community livability and environmental sustainability. This form of development supports climate action objectives through more energy-efficient building design opportunities and facilitates a modal shift to walking, cycling, and transit. Additionally, the development's focus on housing diversity, public space, and connectivity responds to goals around social equity, public health, and quality of life for residents of all ages and abilities.

Within the Built-Up Area, the ROP establishes several objectives for growth including achieving "transit-supportive" development, and the creation of "15-minute neighbourhoods". The proposed

development supports the transit-supportive development goals of the ROP through its compact, mixed-use form and proximity to two (2) ION LRT stations and multiple GRT routes. The high-density design and inclusion of commercial uses enhance the viability of transit and improve the overall transit user experience through walkable, active streetscapes.

It also advances the creation of a 15-minute neighbourhood by placing diverse housing options near jobs, services, and amenities that are accessible by walking, cycling, or transit. The development's connectivity to the Laurel Trail and nearby institutional uses supports daily living needs in a convenient and inclusive urban setting.

iii. Major Transit Station Area Policies

Figure 4c of the Regional Official Plan identifies the subject lands within the 'Research & Technology Station' MTSA plan (Figure 8, p. 40). Section 2.D.2 of the Regional Official Plan provides policies pertaining to MTSAs in the Region of Waterloo. More specifically, Section 2.D.2.2 outlines the specific criteria in which area municipalities, like the City of Waterloo, will undertake detailed planning and establish official plan policies and zoning by-laws to ensure that Major Transit Station Areas are planned and designed in a manner that addresses the criteria listed in the table below. Although these policies are directed to local municipalities in the Region and not the applicant's submitting development applications, it is still important to note how the proposed development aligns with these criteria.

Criteria	**Discussion of Conformity**
a) achieves the minimum density targets set out in Table 2 (160 peoples and jobs per gross hectare measured over the entire station area);	The proposed development contributes to meeting the minimum density target of 160 people and jobs per gross hectare. With 1,907 dwelling units, 2,889 bedrooms, and 2,967 m² of retail/office space, the project delivers a substantial increase in population and employment potential within the MTSA. This aligns with the City and Region's objectives to concentrate growth in strategic locations and optimize the use of existing and planned transit infrastructure.
b) is transit-supportive, supports planned transit service levels, and prioritizes access to the station area and connections to any nearby major trip generators by providing: (i) connections to regional and provincial transit services to support transit service integration; and (ii) mobility networks for walking, cycling, and rolling, including sidewalks, bicycle lanes, and secured bicycle parking;	(i) The subject lands are located within walking distance of both the Research and Technology and University of Waterloo ION stations. These ION stations connect to GRT services and offer indirect access to regional and intercity transit through nearby terminals such as the University of Waterloo's East Campus bus terminal. As such, the development benefits from and supports broader regional transit integration. (ii) The development emphasizes multimodal access, with 1,234 bicycle parking spaces, walkable streetscapes, and proximity to the Laurel Trail and bike lanes along Columbia Street West. A proposed 9.0 metre public right-of-way will further enhance pedestrian

		connectivity and active transportation infrastructure in the area.
c)	provides for a diverse mix of uses, including additional residential units and affordable housing, where residential uses are permitted, to support existing and planned transit service levels;	The development includes a diverse mix of high-density residential and commercial/retail uses, supporting both local needs and transit ridership. While affordable housing is not required through inclusionary zoning at this time, the significant number of new residential units introduced will help increase housing supply and choice within the MTSA.
d)	fosters collaboration between public and private sectors, such as joint development projects;	Not applicable.
e)	provides alternative development standards, such as reducing or eliminating minimum automobile parking standards, or providing maximum parking standards, for uses near transit routes, to maximize intensification opportunities and minimize surface parking areas;	The proposed development includes low parking ratios appropriate for the transit-supportive context and concentrates the vast majority of parking within two levels of underground parking. Minimal surface parking is proposed which would be suitable for deliveries and short-term visits to the development. The parking scheme contemplated is consistent with policies seeking to reduce reliance on automobiles and promote compact, transit-oriented development.
f)	prohibits land uses and built form that would adversely affect the achievement of the minimum density targets set out in Table 2;	The proposed high-density, mixed-use built form is entirely consistent with achieving the minimum density target. The development maximizes land efficiency and does not include low-density or auto-oriented uses that would hinder intensification objectives.
g)	protects existing significant employment uses by ensuring land use compatibility with adjacent new development;	The proposed mixed-use development is compatible with adjacent employment uses, including office and institutional uses. The high-density residential and commercial nature of the proposal complements existing uses and introduces additional customers and potential talent to nearby employers, fostering economic synergies.
h)	supports the implementation of inclusionary zoning by identifying: (i) the authorized uses of land in the station area and of buildings or structures on lands in the area; and (ii) the minimum densities that are authorized with respect to buildings and structures on lands in the station area; and	Although inclusionary zoning has not yet been implemented in the City of Waterloo, the proposal includes clearly defined residential and commercial uses consistent with the City's direction for MTSAs. The requested Official Plan and Zoning By-law Amendments would enable high-density built form that meets the minimum density expectations for this strategic growth area.

i)	is consistent with the relevant transit-supportive development policies of Section 2.D.6.	See the analysis provided in the following section below of this Report.

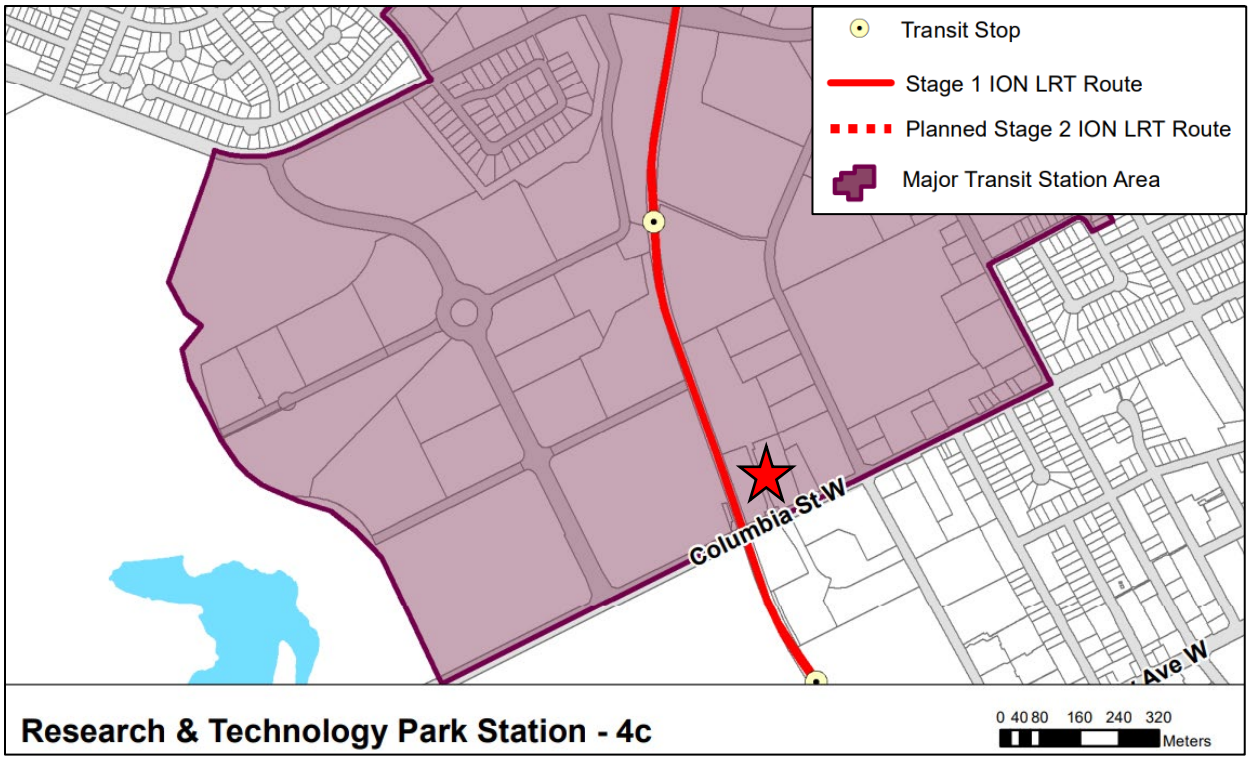


Figure 8: *Region of Waterloo - Figure 4c, Research & Technology Park (Major Transit Station Areas)*

iv. Transit-Supportive Development Policies

Section 2.D.6.1 of the Regional Official Plan outlines the following transit supportive development criteria in reviewing and evaluating development applications or site plans, within strategic growth areas and other intensification areas:

Criteria	Discussion of Conformity
a) creates an interconnected, multimodal street pattern that prioritizes walking, cycling, and rolling, and taking transit over automobile trips, and supports vibrant mixed-use developments;	The proposed development features a highly walkable and interconnected internal circulation network, supported by direct access to Columbia Street West and the Laurel Trail, which connects to surrounding transit, cycling, and pedestrian infrastructure. With 1,234 bicycle parking spaces, limited vehicle parking, and proximity to ION LRT stations, the development prioritizes active and sustainable transportation options over automobile use. The mixed-use character of the development contributes to a vibrant, transit-supportive urban environment.
b) supports a more compact built form that locates the majority of transit supportive uses within a comfortable	The five (5) high-density towers are situated within the Research and Technology MTSA, with the nearest ION LRT stop located within a short walking distance. The compact built form strategically locates residential and

	walking distance of a transit stop or Major Transit Station Area;	commercial uses within comfortable pedestrian reach of high-frequency transit, consistent with the City's intensification goals for MTSAs.
c)	provides an appropriate mix of land uses, including a range of food destinations, local services and amenities to meet peoples' daily needs for living;	The development incorporates 2,967 m² of retail/office space strategically positioned to activate primary building frontages and pedestrian routes. These uses will support the daily needs of future residents by accommodating food services, shops, and other local amenities, reducing dependency on car travel for everyday needs.
d)	promotes medium and higher-density development as close as possible to the transit stop to support higher frequency transit service and optimize transit rider convenience;	All five (5) towers, ranging from 25 to 35 storeys, are located adjacent to the Columbia Street West corridor and within close proximity to two (2) ION LRT Stations. This concentration of high-density residential uses directly supports transit ridership and enhances service efficiency by placing thousands of potential users near the station area.
e)	supports a high quality public realm to enhance the identity of the area and create gathering points for social interaction, community events and other activities; and	The development includes approximately 4,657 m^2 of amenity space (both "Amenity Space" and "Common Outdoor Area" per the Zoning By-law definitions) across both sites. The common outdoor areas are framed by surrounding towers, designed to serve as a gathering point for residents and enhance the site's identity through high-quality landscape and placemaking features.
f)	provides access from various transportation modes to the transit facility, including consideration of pedestrian, bicycle parking, and where applicable, passenger transfer and commuter pick-up/drop off areas.	The site provides excellent multimodal access with connections to the ION LRT, GRT bus routes, and the Laurel Trail. Secure and abundant bicycle parking, walkable access routes, and well-designed pick-up/drop-off areas near building entrances ensure that all modes of transportation are accommodated and integrated into the overall site design.

Based on the foregoing, it is our opinion that the proposed development conforms to the policies of the Regional Official Plan.

v. Source Water Protection

The Subject Property is located within a Wellhead Protection Area (WPSA-8), as shown on Map 6a (Urban Area Source Water Protection Areas) of the ROP. Wellhead Protection Areas are the total area of land which contributes water to a municipal drinking-water supply well. The purpose of these designations is to prevent land uses involving hazardous chemicals/substances, disease causing organisms, etc., that increase the vulnerability of groundwater from becoming water quantity and/or quality risks to municipal drinking-water supply wells.

Wellhead Protection Sensitivity Areas (WPSA) are classified from 1 to 8, which allows for varying degrees of management relative to the vulnerability of the underlying groundwater to contamination, the importance of the well to the capacity of the municipal drinking-water supply

systems, as well as the length of time groundwater within the WPSA will take to reach the municipal drinking-water supply well.

WPSA-8 delineates the area outside of the ten-year time of travel to the limit of the total land area contributing water to a municipal drinking-water supply well. The ROP states that Category 'A' uses (Very High Risk Uses) will not be permitted within WPSA-8, while geothermal wells, mineral aggregate operations and wayside pits and quarries may be permitted subject to further study in accordance with Policy 8.A.4.

Based on our review of the applicable policies, it is our opinion that the proposed mixed-use development would not have adverse impacts to groundwater in the Region. Therefore, it is our opinion that the proposed development conforms to the Source Water Protection policies in the ROP.

d) City of Waterloo Official Plan

The City of Waterloo Official Plan was adopted by Municipal Council in 2012 and sets out the policies that direct growth and change until 2031. The City of Waterloo Official Plan established a policy framework to guide public and private sector decisions relating to development and the provision of community infrastructure and services. The local Official Plan also sets out the intentions of City Council relating to future economic, social and land use changes to the year 2031.

The City of Waterloo is currently undergoing a review of their Official Plan. It is understood that the City is conducting their Official Plan Review in "Phases", which allows for key chapters in the City Official Plan to be updated in the short term, in response to current planning pressures and strategic priorities.

The City has completed Phase 1, as the Province approved Official Plan Amendment No. 58 (OPA 58) on December 17, 2025. The effect of OPA 58 was to align the City's Official Plan with various provincial legislative changes such as Bill 23, 109 and 185, the new PPS 2024, and the Region of Waterloo Official Plan (specifically ROPA 6). Therefore, OPA 58 is currently in-force and effect.

The following subsections of this Report discuss the current policies and land use designations that apply to the Subject Lands, and which are relevant to the proposed Official Plan and Zoning By-law Amendment applications.

i. Land Use Designation – Station Area Mixed-Use

The Subject Lands are designated as 'Station Area Mixed-Use' in Schedule 'A', as per OPA 58 (Figure 9, p. 49). As such, the Subject Lands are no longer considered employment lands in the Official Plan and are subject to the 'Station Area Mixed-Use' designation policies.

Section 10.5 of the Official Plan outlines the vision and planned function of the 'Station Area Mixed-Use' designation, which encourages a full mix of land uses and supports significant intensification within MTSAs. This designation promotes vibrant, transit-oriented communities through mixed-use developments that include both residential and non-residential components.

The policy emphasizes mobility improvements, placemaking, and community-building that reflect the unique character of each station area, while encouraging development to orient toward the LRT corridor and transit stops. Development is expected to align with Station Area Plans to create well-connected, attractive places to live, work, learn, and recreate.

Planning Comment: It is our opinion the proposed development aligns closely with the objectives of the 'Station Area Mixed-Use' designation by introducing a compact, high-density built form that integrates residential units with a mix of non-residential uses at grade. This combination supports the creation of a complete, transit-oriented community in proximity to the ION's Research and Technology Station. The proposal fosters placemaking through enhanced public realm elements, including a central pedestrian corridor and a large common outdoor area fronting Columbia Street W, and promotes mobility by improving internal connectivity and incorporating active transportation infrastructure such as walkways and bicycle parking.

Additionally, the proposed development reinforces the intended urban structure within the MTSA and supports increased transit ridership. As a transformative infill project within the MTSA boundary, it contributes to intensification objectives while also enhancing vibrancy and functionality within the Station Area. Therefore, it is our opinion that the proposed development is consistent with the policy direction of Section 10.5 and supports the overarching vision of the 'Station Area Mixed-Use' designation.

Section 10.5(2) states that lands designated 'Station Area Mixed-Use' shall permit building heights of up to 30 storeys as shown on Schedule 'B1' - Built Form and densities in accordance with the implementing Zoning By-law.

Planning Comment: The applicant is proposing a maximum height of 35 storeys for Phases 1 and 3 of the development, thus exceeding the maximum permitted height of 30 storeys. Therefore, a Site-Specific Official Plan Amendment is required to the 'Station Area Mixed-Use' designation, which is outlined in Section 5.a) of this Report. It is further understood that Section 3.4 of the Official Plan provides policy direction and criteria for development that exceeds the maximum permitted height. An analysis of the criteria is provided in Section 6.d).iii) of this Report below, as well as Section 7 for additional planning rationale.

Section 10.5(3), (4) and (5) of OPA 58 provide a list of uses that are permitted and prohibited in the 'Station Area Mixed-Use' designation.

Planning Comment: The proposed mixed-use development will consist of both residential and non-residential uses (retail and office) that are permitted in this designation.

Section 10.5(6) of OPA 58 requires that lands designated 'Station Area Mixed-Use' be of sufficient size and have adequate frontage along public or private roads to accommodate medium- and high-rise buildings. This is intended to ensure that properties can support the substantial intensification envisioned for these areas. The implementing Zoning By-law may establish specific minimum frontage and lot area requirements to support this goal.

Planning Comment: The Subject Lands are of a sufficient size (combined 1.59 hectares) and configuration to accommodate substantial levels of intensification, including the proposed high-rise mixed-use buildings. The Site benefits from extensive frontage along Columbia Street West and internal private roads, which ensures appropriate access and supports a range of building forms and site functions. The scale and layout of the property allow for a coordinated development that meets the intensification objectives of the 'Station Area Mixed-Use' designation.

Section 10.5(8) through (14) of the Official Plan provides Development Policies for the 'Station Area Mixed-Use' designation. The following table provides a conformity analysis for each policy:

Section 10.5	Discussion of Conformity
8) The intent of this designation is to increase transit ridership, encourage walking and cycling, and to make more efficient use of the City's infrastructure and services, through the development of a mixed-use complete community. Development on land designated Station Areas Mixed-Use shall demonstrate how the intent of the designation has been achieved.	The proposed development supports the intent of the 'Station Area Mixed-Use' designation by delivering a compact, high-density, mixed-use development within walking distance of an MTSA. The proposal includes a mix of residential and non-residential uses that contribute to creating a complete community and support active transportation. Pedestrian-oriented design, enhanced public realm elements, and proximity to the ION LRT corridor will help increase transit ridership, encourage walking and cycling, and promote the efficient use of existing infrastructure and services.
9) The range of uses outlined in policy 10.5 (3), including employment, commercial, community and residential uses, shall be used in combination to create comprehensively planned mixed-use areas and sites, and to contribute to achieving the minimum Staton Area density target of 160 residents and jobs per hectare.	The proposed development includes a strategic combination of residential and non-residential uses that aligns with the intent of Policy 10.5(9). By integrating a mix of uses on-site, including high-density residential units and at-grade non-residential space, the development contributes to a comprehensively planned mixed-use area. This mix of land uses supports a vibrant, transit-oriented community and assists in achieving the minimum Station Area density target of 160 residents and jobs per hectare, consistent with the City's growth and intensification objectives.
10) New development shall demonstrate how buildings and sites will facilitate the achievement of the minimum Station Area density target of 160 residents and jobs per hectare.	The proposed development supports the achievement of the minimum Station Area density target of 160 residents and jobs per hectare through the provision of a high-density built form that includes 1,907 dwelling units combined with ground-floor non-residential uses. The design and scale of the development optimize site utilization and contribute to the overall population and employment density within the Station Area. The proposal's compact urban form, proximity to higher-order transit, and integration of mixed uses ensure

	that the density target is both achievable and sustainable over the long term, which is in alignment with the City's intensification objectives for transit-supportive growth.
11) For lands designated Station Area Mixed-Use, residential uses shall be located above the ground floor, in a multi-storey mixed-use building only, provided further that:	The proposed development conforms to the mixed-use expectations of the 'Station Area Mixed-Use' designation by locating all residential uses above the ground floor within a high-rise built form. The design prioritizes active ground floor uses to support a vibrant streetscape and contribute to the creation of a complete community.
a) Parking required for residential uses shall be provided predominately underground or in a parking structure(s), and structured parking shall not be visible from public view. The implementing Zoning By-law may require structured parking to be located behind building floor area.	a) Residential parking is proposed to be located predominantly underground, minimizing visual impacts and maintaining an active and pedestrian-friendly streetscape.
b) The Zoning By-law will define performance standards that are specific to residential uses, including but not limited to location, amenity space, density, and parking regulations;	b) See Section 6.e) of this Report for a discussion of the Zoning By-law.
c) Freestanding residential uses may be permitted where it is demonstrated to the satisfaction of the City that the site will contain a mixture of uses (including a meaningful amount of commercial, employment and community uses), and the range of uses collectively will contribute to the Station Area density target and a complete community. Freestanding residential uses shall not adversely impact the planned function of the Station Area Mixed Use designation. Freestanding residential development shall only be considered where lands are of sufficient size to accommodate multiple buildings, including one or more buildings adjacent to the street with a meaningful amount of building floor area devoted primarily to retail, service	c) The proposed development is not a freestanding residential use.

commercial, office commercial, and/or employment uses.	
12) Large developments with greater than 1,000 residential units should accommodate two square metres or more of commercial, employment, and/or community uses for every residential unit proposed. a) For clarity, for the purposes of calculating non-residential uses as outlined in policy 10.5 (12), any consideration of community uses shall exclude open space, temporary farmers' markets and community garden uses. b) Planning for employment and office uses, large developments shall demonstrate that the proposed development will achieve a minimum employment density of 35 jobs per hectare.	**Please see the detailed response below this table for an analysis.**
13) Development of mixed-use buildings within the Station Area Mixed-Use designation shall include, but not be limited to the following: a) Short term parking at restaurants for food delivery vehicles and customer pick-ups; b) Secure storage for package deliveries in high-rise buildings; c) Short-term parking for pre-ordered customer pick-ups at retail and food stores; d) Short term parking for deliveries to high-rise buildings, preferably onsite; and, e) Safe movement of bicycles and pedestrians, such as integrated bicycle and pedestrian pathways connecting to and from public rights-of-way.	The proposed development aligns with these requirements through the incorporation of functional design elements that support urban livability and convenience for all users: a) Short-term parking areas are provided adjacent to each building and are intended to accommodate a variety of short duration uses, including food delivery vehicles and customer pick-ups. These spaces are easily accessible from building entrances and will support the operational needs of the non-residential uses on the ground floor. b) While detailed design will be confirmed through the Site Plan Approval process, the development will include dedicated areas within each building for secure package storage. These facilities will ensure efficient and secure handling of deliveries, particularly for residential and commercial tenants. c) As with food delivery vehicles, short-term parking spaces adjacent to each building will support customer pick-ups associated with non-residential uses. d) The development includes integrated pedestrian pathways that connect all buildings

	internally and to the adjacent public rights-of-way. These connections are designed to promote safe, accessible, and efficient movement throughout the Site, encouraging active transportation and supporting the complete community vision.
14) Large parcels of land (2 ha or greater) and/or multi-building developments, are anticipated to be developed in two or more phases. It is the intent of this Plan that the lands be comprehensively master planned prior to development, to demonstrate and ensure: a) Connectivity and integration between the phases; b) Orderly growth and development; c) Coordination of site servicing and stormwater management; d) Public health and safety (including emergency response); e) The provision of sufficient and coordinated green spaces; f) The provision of sufficient community uses and community infrastructure; g) The provision of sufficient and well distributed commercial and employment uses; h) Cost effective development patterns; i) Vibrant and well-designed private and public spaces; and j) Coordinated design standards and guidelines, including urban design.	While the Subject Lands are less than 2 hectares in size (1.59 ha. combined), the proposed development represents a large, multi-building project to be delivered over five distinct phases. In alignment with Policy 10.5(14), the project has been comprehensively planned to ensure coordinated, efficient, and high-quality development across the entire site. a) The proposal ensures continuous pedestrian and vehicular connections across all five phases. Internal streets, pathways, and open spaces have been designed to integrate buildings and public realms in a seamless and accessible manner. b) Phasing has been strategically designed to allow for incremental development while maintaining site functionality and appropriate infrastructure at each stage. Each phase will be self-sufficient, while also contributing to the long-term vision of a complete community. c) As per the Functional Servicing and Stormwater Management Report prepared by WalterFedy, servicing and stormwater management will be developed to function cohesively across the development. Details pertaining to servicing and stormwater management will be further refined during the Site Plan Approvals process. d) Emergency access has been incorporated throughout the Site with appropriate turning radii, fire routes, and access points from public roads. The plan has been reviewed to ensure compliance with emergency response standards. e) The development proposes large common outdoor area, as well as rooftop outdoor amenity spaces. f) Not applicable. g) Non-residential uses are strategically distributed across the Site, including prominent frontage locations and active ground-floor uses to ensure economic vibrancy, employment generation, and walkable amenities. h) Infrastructure and servicing plans have been optimized to reduce redundancies, leveraging shared infrastructure and phased efficiencies. i) The plan incorporates high-quality urban design principles, including active frontages, public plazas,

pedestrian-oriented streetscapes, and architectural variety to foster a vibrant, inclusive environment.

j) Please see the Urban Design Brief prepared by Up Consulting Ltd. for details.

Planning Comment: As noted in the table above, the proposed development aligns with the intent and purpose of the adopted policies listed above, except for Policy 10.5(12).

The current proposal provides 2,967 m² of commercial and employment floor area, representing a substantial increase from the approximately 1,248 m² proposed through Resubmission No. 1. In determining an appropriate amount of non-residential space, the applicant discussed an alternative methodology with City staff that considers the relationship between the overall residential floor area and number of dwelling units proposed. Specifically, the proposed 1,907 dwelling units contain approximately 92,911 m² of Habitable Floor Space.

Research undertaken regarding residential unit sizes within the market area identified an average apartment size of approximately 62.7 m². Applying this market-area benchmark to the proposed 92,911 m² of Habitable Floor Space results in an equivalent residential unit count of approximately 1,483 units. Applying the 2 m² per unit contemplated by Policy 10.5(12) to this equivalent unit count results in a non-residential floor area requirement of approximately 2,966 m², compared with the 2,967 m² proposed across 170 and 180 Columbia Street West.

This methodology is relevant to the intent of Policy 10.5(12), as dwelling unit count alone does not necessarily provide a consistent measure of the overall scale of residential development. Developments containing the same amount of residential floor area may comprise different numbers of dwelling units depending on the particular unit mix and configuration. A strict application of 2 m² to each of the 1,907 proposed dwelling units would result in a requirement of 3,814 m², whereas the equivalent-unit methodology provides a proportional relationship between the overall scale of residential development and the corresponding non-residential component. This approach continues to advance the policy objective of achieving a meaningful mix of residential, commercial and employment uses within the Station Area.

While the 62.7 m² benchmark establishes the appropriate non-residential requirement when the development is considered comprehensively across both properties, 170 and 180 Columbia Street West will continue to constitute two (2) separate parcels for zoning purposes. Further, the proposed non-residential floor area is intentionally distributed differently between the two (2) properties. Approximately 505 m² is proposed at 170 Columbia Street West within Phases 1 and 2, while approximately 2,462 m² is proposed at 180 Columbia Street West within Phases 3, 4 and 5. The latter includes a significant office component within Phase 4 and reflects the intended concentration of employment uses on the 180 Columbia Street West property.

This distribution also reflects the phased implementation of the overall master plan. Phases 1 and 2 will be developed first and will introduce a portion of the ultimate new non-residential floor area. Importantly, during the development of Phases 1 and 2, the existing office building at 180 Columbia Street West will remain in place and continue to accommodate employment uses. Accordingly, the initial phases will be developed while an established employment use continues to operate on the adjacent property. As the master plan progresses and 180 Columbia Street West is subsequently redeveloped, the balance of the new non-residential floor area will be introduced, resulting in the ultimate 2,967 m² contemplated across the development.

To implement this approach while ensuring that each property independently complies with the Zoning By-law, separate site-specific rates are proposed. For 170 Columbia Street West (Phases 1 and 2), a minimum of 2 m² of non-residential Building Floor Area for every 158.7 m² of Habitable Floor Space will be required. For 180 Columbia Street West (Phases 3, 4 and 5), a minimum of 2 m² of non-residential Building Floor Area for every 43 m² of Habitable Floor Space will be required. Based on the current Habitable Floor Space, these rates correspond with approximately 505 m² and 2,458 m² of required non-residential floor area, respectively, compared with 505 m² and 2,462 m² proposed.

The differing parcel-specific rates therefore represent the implementation mechanism for distributing the overall non-residential component between the two (2) properties, rather than separate methodologies for determining the appropriate overall amount of non-residential development. The overarching planning rationale remains based on the 62.7 m² market-area benchmark, which results in approximately 2,966 m² of non-residential floor area across the development. The parcel-specific rates recognize the intended location and timing of that floor area, allow each property to independently satisfy its applicable zoning requirement, and facilitate phased implementation while maintaining the mixed-use intent of the Station Area Mixed Use designation.

Accordingly, the proposed site-specific Official Plan policy and corresponding Zoning By-law provision appropriately address and maintain the intent of Policy 10.5(12). The current provision of 2,967 m² of retail, office and flexible retail/office space establishes a substantial non-residential component and supports the mixed-use and employment objectives of the Station Area, while the proposed methodology ensures that an appropriate and proportionate amount of non-residential floor area will continue to be provided as the development is refined and implemented.

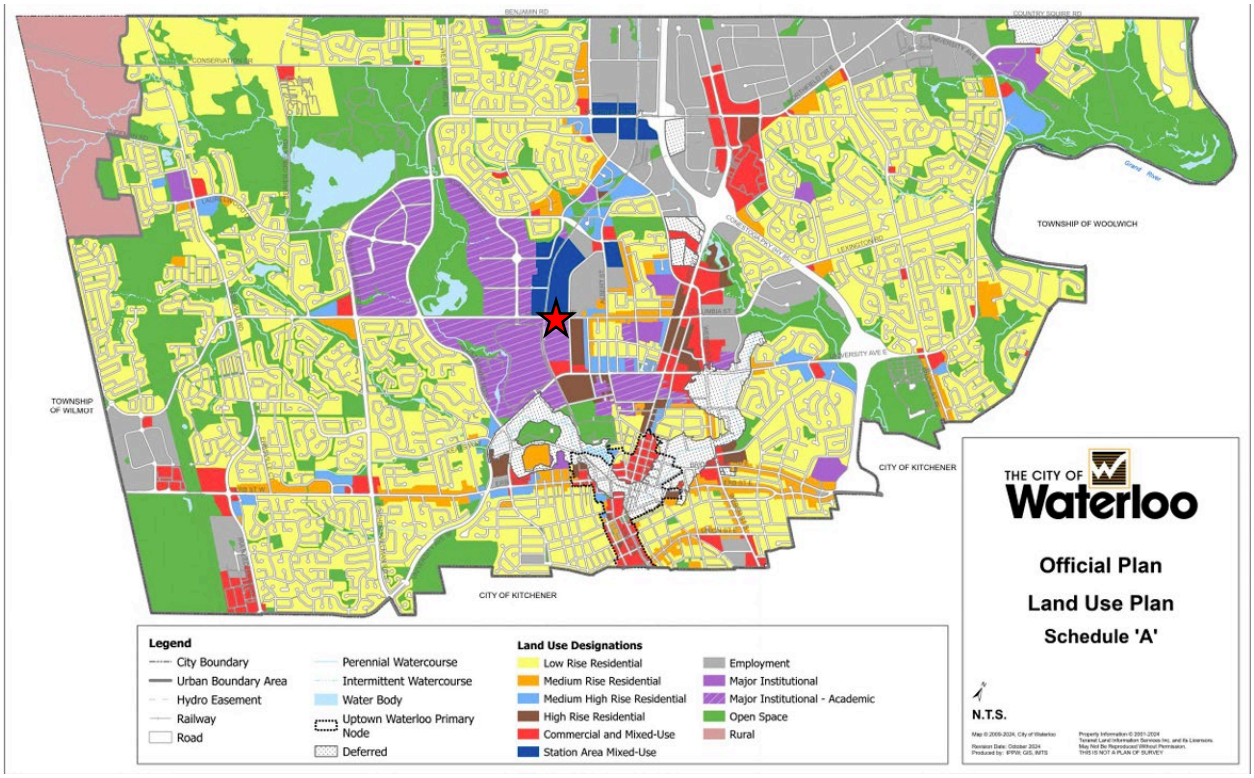


Figure 9: *City of Waterloo Official Plan - Schedule 'A' (Land Use Plan)*

ii. City Structure – Major Node

The Subject Lands are within the 'Major Node', as per Schedule 'B' of OPA 58 (Figure 10, p.53). Prior to the Provincial approval of OPA 58, it was understood that the Subject Lands were already located within the 'Major Node' designation. As such, the following subsection provides a review of the 'Major Node' policies as amended through OPA 58.

As per Section 3.5 of the Official Plan, it is understood that the majority of new development in the City will be directed to specified urban structural components in accordance with this Plan. These urban structure components include Nodes, Corridors, Major Transit Station Areas, and Designated Growth Areas. Where authorized by this Plan, development may occur outside of these identified areas, however, the majority of development will be directed to these strategic growth areas which form the core of the City's structure.

Planning Comment: The proposed development aligns with the overarching objective of Section 3.5 by directing significant growth to a MTSA, a key component of the City's urban structure and a designated strategic growth area. Located within the Research and Technology Station Area, the Subject Lands are well-suited for high-density, mixed-use intensification that supports transit-oriented development. The proposal contributes to the City's planned growth framework by focusing new residential and non-residential uses within a priority area identified for intensification. This targeted approach reinforces the City's vision of compact, transit-supportive development, while reducing pressure to accommodate growth in less suitable or peripheral areas of the city.

Section 3.5(2) of OPA 58 states that 'Major Nodes' are planned as medium-high to high-rise mixed-use areas that accommodate a range of uses, which may include residential, commercial, employment, social, cultural, recreational and institutional uses. Commercial uses that provide for the day-to-day and weekly shopping needs of several surrounding neighbourhoods will be encouraged and, where appropriate, Major Nodes shall be planned to accommodate small- to medium-sized food stores, with the objective that all residents will have access to a food store within an approximate 15-minute walking distance of their residence. Employment areas that are located within Major Nodes will be planned to support Major Nodes as a destination, and in order to provide such support, are not contemplated to be converted to non-employment uses.

Planning Comment: The proposed development is consistent with the policy direction for 'Major Nodes' as outlined in Section 3.5(2) of the Official Plan. The development introduces a high-density, mixed-use built form that includes both residential and non-residential components, aligning with the intended function of 'Major Nodes' as vibrant, multi-functional areas. The inclusion of non-residential uses, being retail and office units, at grade creates opportunities for day-to-day services and amenities that can serve not only future residents but also the surrounding neighbourhood, thereby enhancing walkability and local convenience.

Additionally, the proposed development supports the objective of promoting 'Major Nodes' as key destinations by contributing to a critical mass of population and activity. Its location within close proximity to employment areas and existing transit infrastructure reinforces the City's vision for these areas to be dynamic, connected, and self-sustaining urban hubs. While the Subject Lands have been removed as employment lands, per ROPA 6 and OPA 58, the inclusion of non-residential uses to the proposed development contributes to the vitality of the Node and supports a balanced mix of land uses in the broader Station Area.

Section 3.5.4 of the Official Plan outlines policies to guide intensification within designated 'Nodes, Corridors and Major Transit Station Areas', which are areas identified for medium- to high-density development.

Planning Comment: It is our opinion the proposed development aligns well with the intent and policies of Section 3.5.4, as it encourages intensification within Nodes through medium to high-density development that supports transit, community infrastructure, and an animated public realm. The following describes how the proposed development aligns with the criteria of Section 3.5.4:

Criteria	Discussion of Conformity
1) Mixed-use development will be strongly encouraged within the designated Nodes, Corridors and Major Transit Station Areas, where appropriate, provided the land use designation and zoning support such mixed-use development. It is not the intent of this Plan that all lands within Nodes, Corridors and Major Transit Station Areas will accommodate a full mix of uses and direction will be provided in this regard through the land use designations applied to the lands.	The proposal includes a mix of residential and non-residential / commercial uses, consistent with the Major Nodes and Station Area Mixed Use designation.
2) High Rise, Medium-High Rise and Medium Rise land uses will primarily be located in designated Nodes, Major and Minor Corridors, and Major Transit Station Areas, and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses. However, Low Rise land uses will be maintained in Minor Neighbourhood Corridors.	The development provides high-density residential units in close proximity to ION LRT stations, GRT routes, and major roads.
3) Construction of new low rise uses will be discouraged within designated Nodes, Major and Minor Corridors and Major Transit Station Areas. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter.	No new low-rise uses are proposed, as the development supports compact, high-density built form.
4) Intensification of existing low-rise housing to higher density multiple residential buildings will be encouraged in designated Nodes, Corridors and Major Transit Station Areas by the application of minimum densities on residential lands, where applicable.	The proposal replaces underutilized low-rise office development with high-density, transit-supportive buildings.
5) Minor Neighbourhood Corridors shall be zoned to permit a range of more intensive Low Rise residential uses including but not limited to: stacked townhouses and low-rise apartments, as well as converted dwelling houses and Additional Residential Units (see policy 10.1.2 of this Plan). The implementing Zoning By-law and/or other	Not Applicable.

	guiding documents may further articulate and control the design of development within a Minor Neighbourhood Corridor to ensure that the intent of this Plan is achieved, and development is compatible with and provides an appropriate transition in relation to adjacent land uses.	
6)	In planning for more intensive low rise, medium rise, medium high rise and high rise housing sites, and to assist in the achievement of planned densities in a given area, the Zoning By-law may identify minimum lot sizes and other performance standards in designated Nodes, Corridors and Major Transit Station Areas that encourage lot consolidation and discourage the division of land intended for multiple unit housing forms.	At this time of the Official Plan and Zoning By-law Amendment stage, both 170 and 180 Columbia St W will remain as distinct parcels that meet the minimum lot area requirements of the Zoning By-law. The proposed development contemplates a thoughtful and comprehensive, large-scale development that maximizes the land area.
7)	The City, in consultation with the Municipal Heritage Committee, encourages adaptive reuse of significant built heritage resources, and requires the conservation of cultural heritage resources in all areas of the City, including designated Nodes and Corridors.	Not Applicable.

Overall, it is our opinion that the proposed development achieves the overarching policy direction of the Major Nodes designation by introducing a high-density, mixed-use form that supports transit-oriented development and contributes to the creation of a vibrant, complete community.

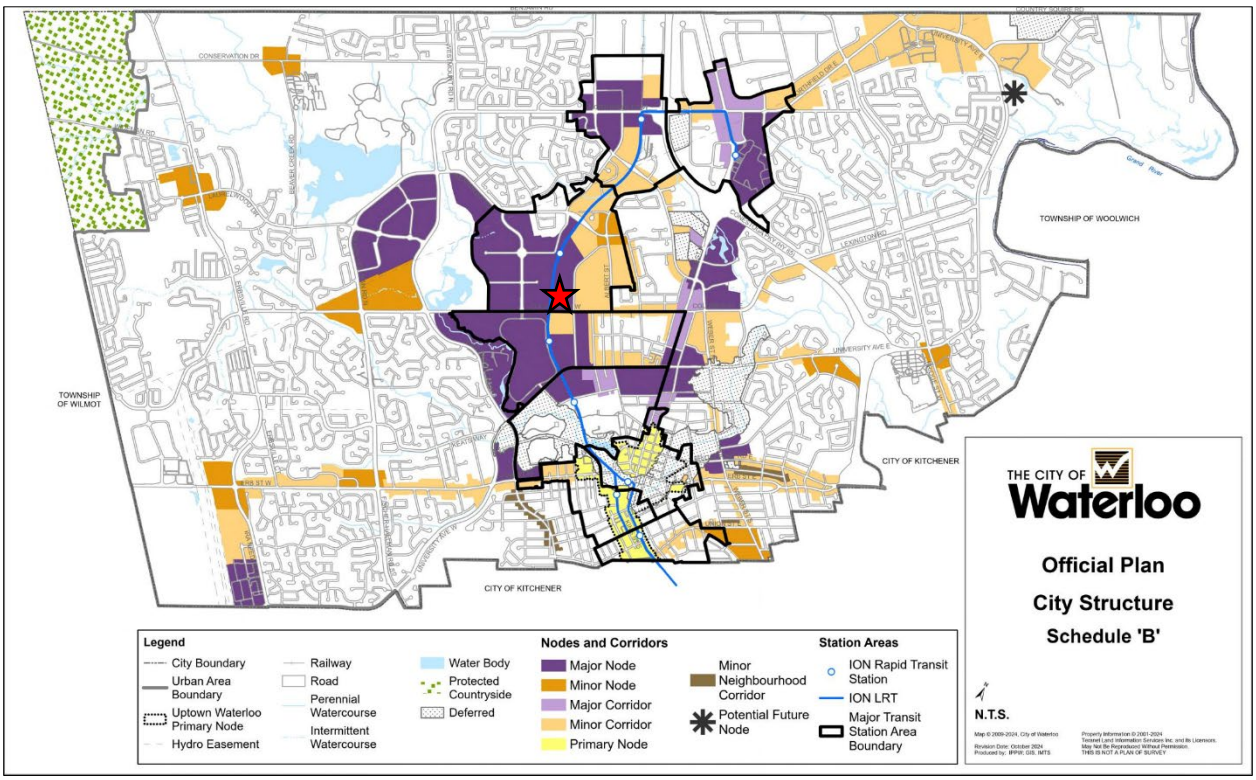


Figure 10: *City of Waterloo Official Plan Schedule 'B' (City Structure)*

iii. Built Form – High Rise, 30 Storeys

The subject lands are within the 'High Rise, 30 Storeys' designation, as per Schedule 'B1' of OPA 58 (Figure 11, p. 58). As per Section 3.4(2) of the Official Plan, the maximum permitted height on the Subject Lands is 30 storeys within this designation, given the Subject Lands are located within a MTSA. Further, Section 3.4(3) of the Official Plan states that the minimum and/or maximum density may be established in the implementing Zoning By-law and that density provisions may be based on considerations that are unique to individual sites or areas. Maximum densities were also removed as part of OPA 58.

Planning Comment: The proposed development would exceed the maximum height requirement of 30 storeys, as a maximum height of 35 storeys is proposed. It is our opinion the proposed height increase to 35 storeys is appropriate given the Site's location within a MTSA and along a significant transit corridor, where greater intensification is encouraged. The additional 5 storeys of height support the City's goals for compact, transit-oriented development and contributes to achieving density targets for residents and jobs. The design integrates height with a strong public realm, active frontages, and high-quality architecture to ensure compatibility and place-making within the surrounding context. Please refer to Section 7 of this Report for additional planning rationale.

Section 3.4(4) of the Official Plan states that residential density shall be measured using a gross density calculation after all road widenings and other land conveyances. All portions of the Site that permit residential uses shall be used to calculate adherence to such gross density regulations.

Planning Comment: As such, the proposed development would have a gross residential density of 1,452 units per hectare across both sites.

Section 3.4(6) of the Official Plan provides policy direction and criteria with respect to requests for increased heights. Given the applicant is proposing to exceed the maximum permitted height of 30 storeys, such criteria would apply. It is understood that any applicable land use designation, or any area-specific planning document, will be considered based on the following and any other consideration deemed appropriate by the City:

Criteria	Discussion of Conformity
a) Lands are located within a designated Node, Corridor or Major Transit Station Area and satisfy all relevant policies of the City Form Chapter;	The Subject Lands are located within an MTSA and designated within a 'Major Node' in the Official Plan, aligning with intensification and transit-supportive development objectives outlined in the City Form Chapter.
b) The proposed built form is deemed appropriate for the site and neighbourhood, has minimal impact on neighbouring land uses, and achieves an appropriate built form transition and buffer from lands designated Low Rise Residential;	The proposed development includes strategic massing and tower placement to mitigate impacts, with significant setbacks and transition to adjacent uses. There are no adjacent Low-Rise Residential lands that would be negatively impacted.
c) There is a demonstrated benefit to the surrounding community associated with granting the increase in building height beyond that of accommodating additional population in the context of Waterloo's population forecast and the supply / capacity of lands within existing designated Nodes, and Corridors, and Major Transit Station Areas; i. positive benefits noted in 3.4(6)(c) may include but are not limited to a broader mix of multi-bedroom units, enhanced active transportation connections, conservation of cultural heritage, enhanced sustainable design, increased parkland, and sustainable building features;	The proposal offers community benefits including active transportation infrastructure for bicycle parking and pedestrian connections, sustainable building design, and a mix of bachelor, one, two, and three-bedroom units.
d) There are limited adverse impacts to the surrounding area(s) in relation to sun, shadow, wind, significant views, transportation, compatibility, and emissions (including noise);	Comprehensive technical studies, including shadow, wind, and noise assessments, demonstrate that any impacts are limited and are appropriately mitigated.
e) The site is well served by existing or planned transit;	The site is within close walking distance of two (2) ION LRT stations and multiple GRT

		bus routes, providing exceptional transit access.
f)	The proposal does not require significant relief from standard regulations including landscaping, amenity space and other site-specific requirements;	Please refer to Section 5 of this Report for the requested Site-Specific relief from the Official Plan and Zoning By-law. Please refer to Section 7 of this Report for the detailed planning rationale. Overall, it is our opinion that the requested Site-Specific Provisions are aligned and in keeping with the public policy framework and is appropriate for the Subject Lands.
g)	Surface parking is minimized in favour of more intensive forms of parking, including underground parking where feasible;	Majority of parking is provided underground, with minimal short-term surface parking that is hidden from Columbia Street and integrated behind buildings.
h)	Cultural heritage resources are conserved;	Not applicable as there are no known cultural heritage resources on-site.
i)	The proposal demonstrates a high standard of urban design in accordance with the City's Urban Design standards and guidelines and any other relevant urban design policies set out in this Plan;	The development meets City urban design guidelines with a focus on streetscape activation, pedestrian connectivity, and quality architecture. Pease refer to the Urban Design Brief prepared by Up Consulting Ltd.
j)	The proposal identifies and implements any required transportation improvements, with a particular focus on transportation demand management measures;	A Transportation Impact Study was prepared by GHD. The study concluded that the proposed development can be supported by the existing and planned transportation infrastructure. Further, the proposed development incorporates transportation demand management (TDM) measures such as bike parking and transit incentives.
k)	Medium to high rise residential uses are located with direct vehicular access to arterial or collector roads to the extent possible. Where such access is deemed by the City to be undesirable or not feasible, vehicular access may be provided by local streets if traffic is directed to the nearest arterial or collector road via a route that minimizes vehicular travel within the low density rise residential neighbourhood;	The Site has direct access to Columbia Street, an arterial road, ensuring efficient vehicular circulation and minimal impact on local streets.
l)	Infrastructure capacity is not exceeded;	A Functional Servicing Report was prepared by WaterFedy as part of the complete submission package and confirms that existing municipal

	infrastructure can accommodate the proposed development.
m) Community services, infrastructure and transportation impact issues are adequately addressed, as applicable. A Transportation Impact Study, Servicing Report, and any other relevant supporting information may also be required. All relevant supporting information may require, at the City's request, examination of off-site impacts;	Please refer to Section 8 of this Report which summarizes all of the required technical studies and reports prepared in support of the proposed development. Based on these studies, it is our opinion that community services, infrastructure and transportation impact issues are adequately addressed at this stage in the approvals process.
n) If applicable, safe access, flood protection and geotechnical stability is achieved to the satisfaction of the City and the Grand River Conservation Authority, and any other authority having jurisdiction;	The lands are not impacted by GRCA regulated lands.
o) Emergency response is determined feasible, and emergency access is provided, to the satisfaction of the City; and,	Emergency access is integrated into the site design, with adequate turning radii, access points, and fire route compliance.
p) The proposal satisfies all other applicable policies, including the policies of this Official Plan.	It is our opinion that the proposed development satisfies all other applicable policies, including the policies of this Official Plan, as demonstrated in this Report.

Section 3.4(8) of the Official Plan also provides policy direction for height requests that exceed the maximum requirements of the 'High-Rise' designation. More specifically, this Section states that applications that exceed the maximum height limit must demonstrate how the impact of the increased height will be minimized on adjacent low- or medium-rise areas. Such applications must demonstrate appropriate building massing and built form to mitigate shadow impacts, wind impacts, retain prominent views (including sky views), and complement the planned scale and densities of adjacent properties.

Planning Comment: It is our opinion that the proposed development satisfies Section 3.4(8) of the Official Plan with respect to increased building height. The Subject Lands are located within a designated Major Transit Station Area and Major Node, where increased height and density are anticipated and encouraged to support transit-oriented development and intensification objectives. The proposed built form is appropriate for the Site and surrounding context, particularly as the Subject Lands are not adjacent to any Low-Rise Residential or Mid-Rise Residential designations. All adjacent lands are located within the same MTSA boundary and are expected to experience similar levels of intensification. Furthermore, Columbia Street West serves as a physical and visual buffer to the south, providing sufficient separation between the proposed towers and any potential land use conflicts. In particular, the tower in Phase 3 fronting Columbia Street West is strategically positioned along the frontage to ensure appropriate spacing and to minimize potential impacts related to scale and massing to the University of Waterloo East Campus buildings.

Section 3.4(9) of the Official Plan states that as the height and/or scale of a development increases, the applicant shall demonstrate how the urban design, mitigation of impacts, and benefits to the surrounding community correspondingly increase.

Planning Comment: As the proposed development introduces a building height that exceeds the permissions (35 Storeys versus the 30 Storey maximum), the proposal has been carefully designed to ensure that the urban design quality, mitigation of potential impacts, and public benefit are proportionately enhanced in line with the increased scale. The proposed towers have been designed with a strong emphasis on architectural quality, visual interest, and the creation of a pedestrian-friendly public realm. The building siting, massing, and articulation aim to minimize shadowing, overlook, and wind impacts, while maintaining generous tower separation and stepbacks to preserve sky views and light access. In particular, the proposal incorporates a 24.0-metre tower separation between the towers across the two (2) parcels, exceeding the minimum 22.0-metre zoning regulation, and locates towers to maximize openness between buildings. These separations not only respect privacy and minimize visual intrusion but also reinforce a sense of spaciousness between high-rise forms despite the increased height.

In terms of community benefit, the development supports a range of objectives including an increased supply of housing within an MTSA, bicycle parking, and high-quality urban design. The proposal also includes minimal surface parking (13 parking spaces in Phase 1 and 2, and 15 parking spaces in Phases 3 to 5), prioritizing underground parking to reduce the visual dominance of vehicles and reinforce pedestrian orientation. It is our opinion that these features represent a clear commitment to delivering a well-rounded development that justifies the increased height and contributes meaningfully to the surrounding community.

Section 3.4(11) of the Official Plan states that new development shall seek to optimize, rather than maximize, height and density on any site. Optimization involves an appropriate and desirable balance between various city-building objectives, including the provision of housing, achieving built form and urban design objectives, a vibrant public realm, local economic development, preservation and enhancement of cultural heritage resources, site functions, provision of social and amenity spaces (including green spaces), land use compatibility, and community building. Development shall be required to comprehensively consider and support the totality of such objectives, to ensure that it constitutes good planning and aligns with the urban design and built form principles and objectives as outlined in this Plan.

Planning Comment: It is our opinion the proposed development reflects an optimized, rather than maximized, approach to height and density. While the height exceeds the permissions in the Official Plan, the proposal achieves a balanced and context-sensitive form of intensification that aligns with multiple City-building objectives. The development delivers a significant number of new residential units within a MTSA, contributing to the City's intensification goals and housing supply while also integrating with the broader transit network.

Urban design excellence is prioritized throughout the Site, with a clear emphasis on human-scale design, high-quality materials, and active ground-floor uses that promote vibrancy and street-level activity. Public and private realm improvements are embedded into the proposal, strong pedestrian connections, and appropriate tower placement to support walkability, accessibility, and safety. The proposal does not pursue density at the expense of livability, heritage, infrastructure

capacity, or compatibility. Instead, it integrates land use, mobility, social spaces, and sustainability considerations in a manner that constitutes good planning and supports the City's vision for complete, connected, and vibrant communities.

Section 3.4(12) of the Official Plan states that any proposed tall building developments exceeding 410 metres above sea level shall demonstrate that the proposed development will not negatively impact the Region of Waterloo International Airport and public safety, as demonstrated either through an aeronautical assessment prepared by a qualified consultant, or a Land Use Assessment from NAV Canada, to the satisfaction of the Region of Waterloo.

Planning Comment: As part of the Zoning By-law Amendment Application, the applicant is requesting that a Holding Provision (H) be applied to the subject property in which no development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

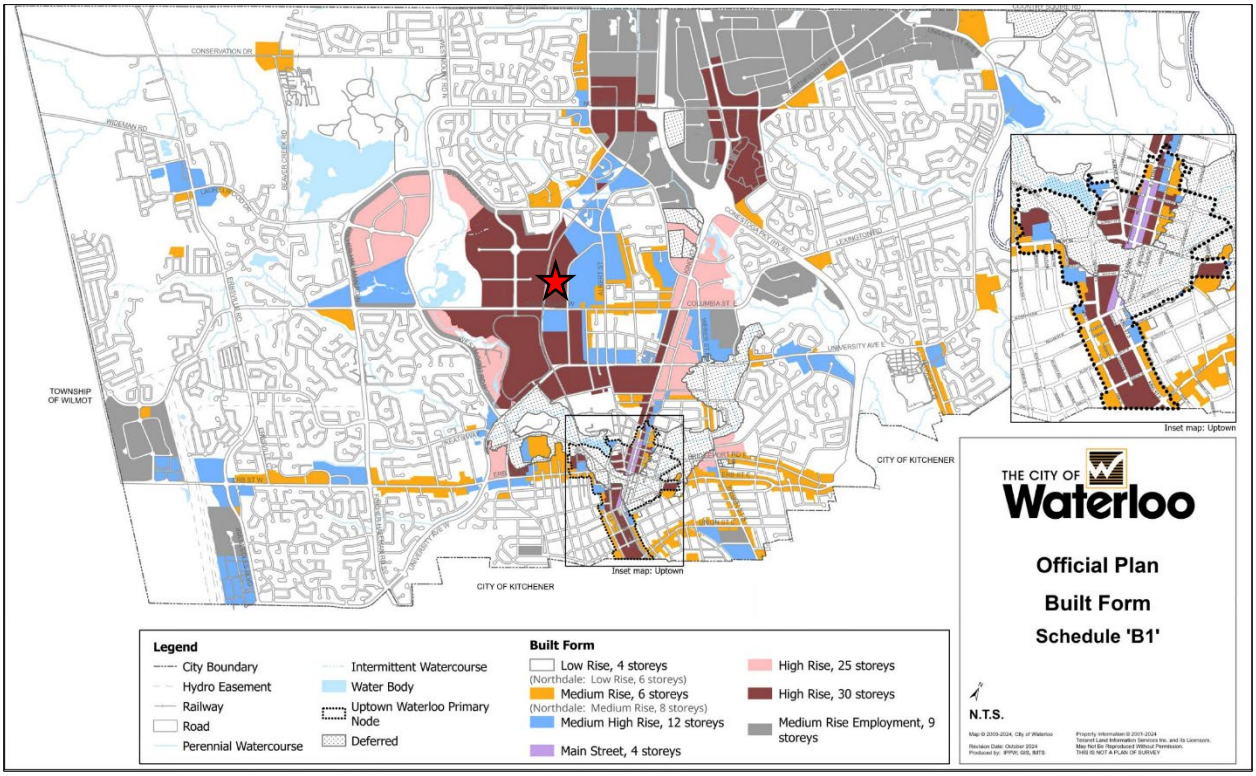


Figure 11: *City of Waterloo Official Plan - Schedule 'B1' (Built Form)*

iv. Source Water Protection Area – Wellhead Protection Sensitivity Area 8

Section 8.3.3.1 of the Official Plan establishes Source Water Protection Areas as "areas that contribute water, or are in close proximity, to municipal drinking-water supply wells that are vulnerable to contamination and/or depletion from incompatible land uses". The south-western corner of 180 Columbia St W is located within a Wellhead Protection Sensitivity Area (WPSA) 8 of the Official Plan (Figure 12, p. 59), consistent with the designation identified in the ROP.

Planning Comment: As previously mentioned, it is our opinion that the proposed mixed-use

development would not have adverse impacts to the groundwater. Therefore, it is our opinion that the proposed development conforms to the Source Water Protection policies in the City's Official Plan.

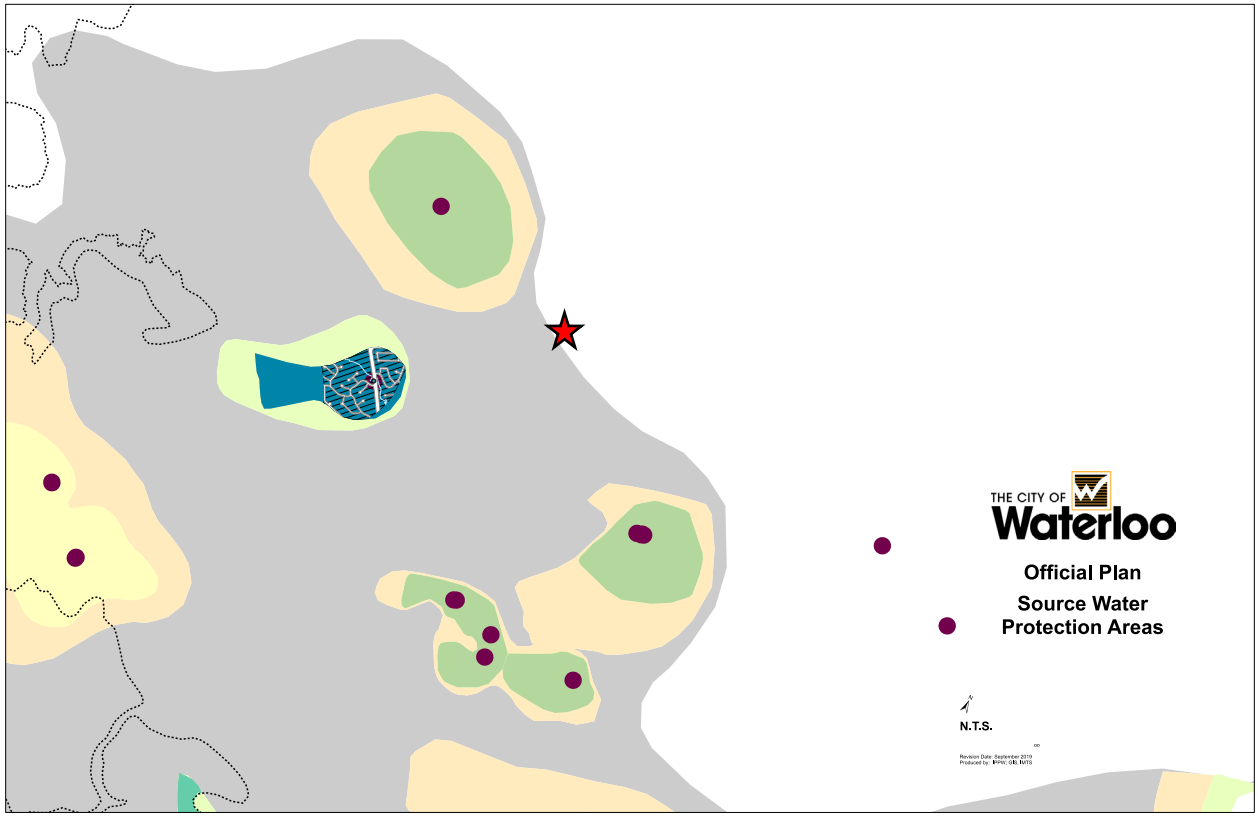


Figure 12: *City of Waterloo Official Plan - Schedule 'B4' (Source Water Protection Areas)*

v. Road Classification – City Arterial

The Subject Lands front Columbia Street West which is identified as a 'City Arterial' road in Schedule 'E' of the City of Waterloo Official Plan (Figure 13, p. 60). As per Table 5-1 of the Official Plan, 'City Arterial' roads serve a primary function of people and goods movement and a secondary land use access function, facilitating the movement of large volumes of people, including truck traffic, within the City. They also regulate access to abutting lands except where existing development makes this impractical; access is normally provided from Collector Roads.

Planning Comment: It is our opinion that the proposed development is supportive of the municipal road system. As summarized in Section 8 of this Report, the revised Traffic Impact Assessment prepared by GHD as part of the resubmission package notes that the proposed redevelopment can be supported by the existing and planned transportation infrastructure. The proposed development will have continued access along Columbia Street West, is within immediate proximity to public transit, and will offer 1,234 bicycle parking spaces.

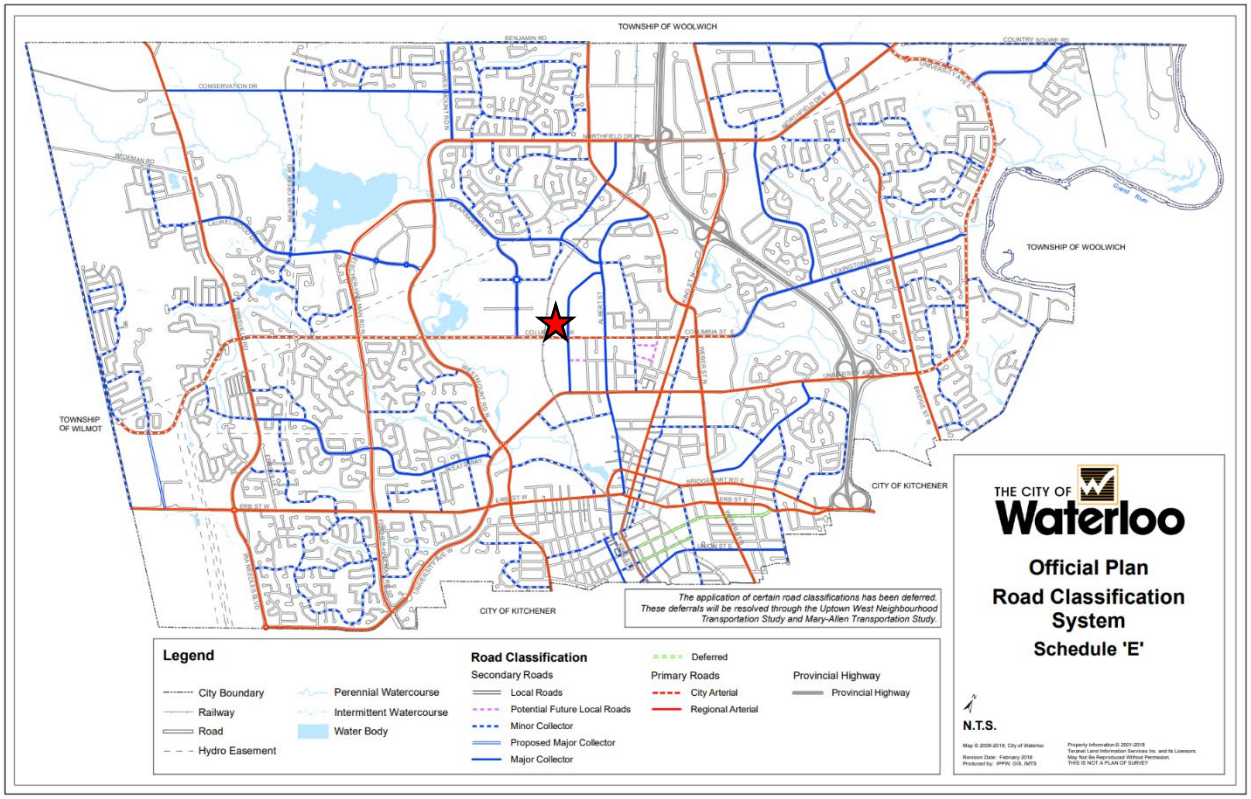


Figure 13: *City of Waterloo Official Plan - Schedule 'E' (Road Classification System)*

vi. Active Transportation Framework

The Subject Lands are adjacent to the existing 'City-Wide Cycling and Multi-Use Routes' along Columbia Street West, as well as the Laurier Trail to the west of the lands, as per Schedule 'F' of the City of Waterloo Official Plan (Figure 14, p. 61). Further, an 'Active Transportation Corridor (Conceptual)' traverses between the Subject Lands. It is understood that this conceptual corridor follows the existing access, to remain, that runs between the sites.

Planning Comment: The proposed development will support and enhance the active transportation network identified in the Official Plan by integrating both short-term and long-term bicycle parking facilities and maintaining the existing access route that traverses the Site. This existing access will be improved with internal sidewalks and/or walkways, as well as enhanced landscaping to create a safe, attractive, and functional pedestrian-oriented corridor running north-south through the development. By formalizing and upgrading the conceptual active transportation corridor noted in Schedule 'F' of the Official Plan and providing direct connections to the adjacent 'City-Wide Cycling and Multi-Use Routes' along Columbia Street West and the Laurier Trail, the development will promote walkability, cycling, and connectivity, supporting broader city goals for sustainable and active transportation.

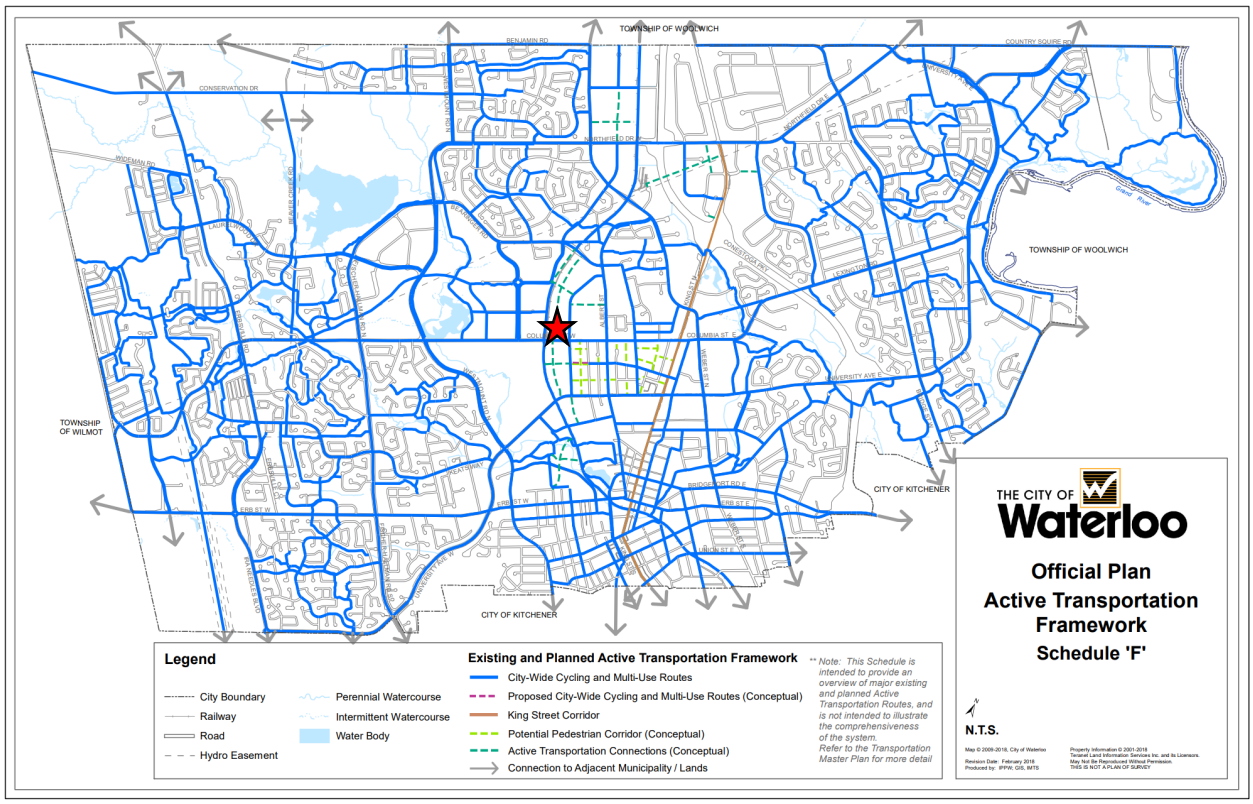


Figure 14: *City of Waterloo Official Plan - Schedule 'F' (Active Transportation Framework)*

vii. Major Transit Station Areas - Research and Technology Station Area

The Subject Lands are within the Research and Technology Station Area, in Schedule 'J3' of the Official Plan (Figure 15, p. 63). It is understood that Schedule 'J3' remained unaltered due to OPA 58.

Section 3.5.3 of the Official Plan provides policy direction with respect to development within MTSAs. As per Section 3.5.3, these areas, shown on Schedule 'B' – City Structure of the Official Plan are a major focus for future growth and intensification. Higher population and employment densities and a mix of uses are planned within these areas to support transit ridership, and contribute to the development of complete communities, with convenient access to a range of housing options, including affordable housing, jobs and local services / amenities.

Planning Comment: The proposed development directly supports the objectives of Section 3.5.3 of OPA 58 by contributing to the planned intensification and mixed-use vision for lands within an MTSA. The subject Site is located within a designated MTSA and is well-positioned to accommodate higher residential densities that align with the City's intensification goals. The development includes multiple residential towers that will provide a significant supply of new housing, including a variety of unit sizes to support a diverse range of household types.

The proposed density supports transit ridership by placing thousands of residents and potential transit users within close walking distance of the ION LRT and existing transit routes, thereby reinforcing the transit-supportive nature of the Site. Furthermore, the development contributes to the formation of a complete community by integrating active transportation connections, public

realm improvements, and access to amenities and services both within the development and in the surrounding area. Overall, the proposal exemplifies the type of intensification envisioned for MTSAs and helps advance the City's broader City-building and sustainability objectives.

Further, Section 3.5.3(2) of the Official Plan, MTSAs are to achieve a minimum combined density of 160 residents and jobs per hectare. MTSAs are intended to accommodate a mix of transit supportive land uses that create both origins and destinations for transit users, as well as be focal points for active transportation networks, with connections to other destinations.

Planning Comment: The proposed development directly supports the objectives for MTSAs as outlined in Section 3.5.3(2) of the Official Plan. It contributes toward achieving the minimum gross density target of 160 residents and jobs per hectare by introducing a compact, high-density built form that will include a mix of residential and non-residential uses. The proposal introduces a mix of uses that create both origins and destinations for transit users, enhancing the functionality and appeal of the MTSA. Its location near higher-order transit and incorporation of active transportation infrastructure, including internal sidewalks, walkways, and long and short-term bicycle parking, help establish the Site as a key node within the broader pedestrian and cycling network. The development fosters place-making through high-quality design, landscaping, and integration with an enhanced pedestrian corridor that traverses the Site, supporting connectivity and accessibility.

Section 3.5.3(5) of the Official Plan provides policies specific to lands in closest proximity to an LRT stop shown as ‘Area A’ on Schedule ‘J3’. These lands are to become vibrant, compact activity nodes with active streetscapes that discourage automobile dependency. The policy restricts new auto-oriented uses and surface parking, encourages active or convertible frontages at the ground level of buildings, and mandates building design elements like minimal setbacks and strong street presence to promote walkability. Parking provisions must support reduced automobile reliance and promote cycling and transit use. Drive-through facilities are generally prohibited but may be considered under strict criteria through comprehensive planning applications if they do not compromise pedestrian safety, streetscape continuity, or overall density and design objectives.

Planning Comment: The proposed development aligns closely with the policy direction for ‘Area A’ within the MTSA. Situated within close proximity to an LRT stop - the Research and Technology Station - the development has been designed to support a high-intensity, pedestrian-oriented, mixed-use environment. The built form emphasizes compact design with strong street relationships and active frontage along key pedestrian corridors, contributing to an animated and engaging public realm.

The proposed development avoids new automobile-oriented uses and limits surface parking to a minimal amount designated for short-term or barrier-free use and is located behind the proposed towers and screened from the public realm to maintain a pedestrian-friendly streetscape. The majority of parking will be located underground, supporting the Plan’s intent to reduce reliance on automobiles. In addition, both short-term and long-term bicycle parking spaces will be provided, further encouraging active transportation and transit use. Through its compact form, walkable design, and mix of uses, the proposal supports the City’s objective for ‘Area A’ to function as a vibrant activity node that enhances connectivity, promotes transit usage, and contributes to a high-quality public realm.



Figure 15: *City of Waterloo Official Plan - Schedule 'J3' (Research and Technology Station Area)*

viii. Urban Design

Section 3.9 of the Official Plan provides policy direction with respect to urban design in the City of Waterloo. As such, an Urban Design Brief has been prepared by Up Consulting Ltd. as part of the original application submission. The Brief provided an overview of the urban design framework applicable to the site, the existing conditions of the property and its neighbourhood context, and summarized how the design of the proposed development reflects the urban design policies and objectives of the City of Waterloo Official Plan and Urban Design Manual.

e) City of Waterloo Zoning By-Law

The Subject Lands are zoned '(Holding) Business Employment Two A Zone' ((H)E2A-81), as per Schedule 'A' of the City of Waterloo Zoning By-Law 2018-050 (Figure 16, p. 64). As part of OPA 58, it is understood that a City-led Zoning By-Law Amendment (Z-24-14) was advanced to implement the Station Area Mixed Use land use designations of OPA 58 once approved. As such, the lands are to be zoned '(Holding) Station Area Mixed Use ((H)SAMU-105)' in order to conform to the recently approved OPA 58.

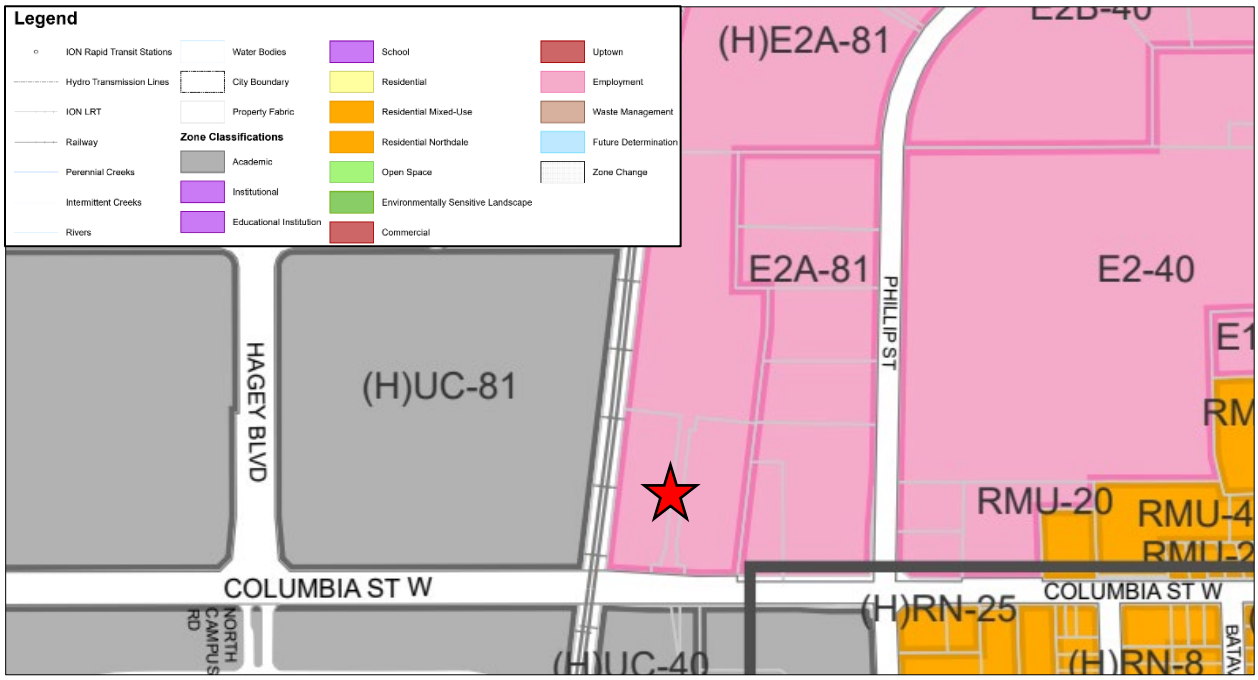


Figure 16: *City of Waterloo Zoning By-law – Schedule 'A'*

i. Proposed Zoning

As per Section 95.1.1 of the current Zoning By-law, the (H)E2A-81 Zone does not permit the proposed mixed-use development and is not aligned with the approved land use designation in OPA 58. As such, a Zoning By-law Amendment is required to permit the proposed development on the Subject Lands.

The proposed Zoning By-law Amendment seeks to rezone the subject property from the current 'Holding Business Employment Two A ((H)E2A-81)' Zone to a '(Holding) Station Area Mixed Use ((H)SAMU-105)' Zone with Site-Specific Provisions.

Per the following subsections, the applicant is proposing two (2) distinct SAMU-105 Zones with Site-Specific Provisions for *each* property, being 170 Columbia St W and 180 Columbia St W. This is also summarized in Section 5 of this Report.

170 Columbia Street West (Phases 1 & 2)

The following table assesses the SAMU-105 Zone Performance Standards outlined in Tables 9S.-G and 9S-H of the Zoning By-Law in relation to the proposed development (Phases 1 and 2) on the 170 Columbia St W site. Regulations in **red** denote Site-Specific Relief:

Regulation	Requirement	Proposed
LOT FRONTAGE (minimum)	20 metres	52.24 m
STREET LINE setback (minimum)	4 metres	12.3 m

STREET LINE setback (maximum)	75% of the STREET LINE BUILDING FAÇADE shall be within 6.0 metres of the STREET LINE	0%
SIDE YARD setback (minimum)	3 metres	**Phase 1** East Yard: 5.8 m West Yard: 4.2 m **Phase 2** East Yard: 5.8 m West Yard: 4.3 m
REAR YARD setback (minimum)	3 metres	14.9 m
Non-Residential Uses (minimum)	For LOTS with more than 1,000 DWELLING UNITS, the minimum BUILDING FLOOR AREA for non-residential uses in 9S.3.1, excluding STRUCTURED PARKING, shall be 2.0 square metres per DWELLING UNIT, and 1.0 square metre per DWELLING UNIT in all other instances.	**Phase 1:** 463 m^2 **Phase 2:** 42 m^2 **TOTAL: 505 m^2 (2 m^2 of non-residential Building Floor Area for every 158.7 square metres of Habitable Floor Space)**
Number of BUILDINGS on a LOT (maximum)	More than one (1) main BUILDING permitted	2
Density (maximum)	900 BEDROOMS per hectare	**2,197 bedrooms per hectare**
Height of FIRST STOREY (minimum)	4 metres	7 m
BUILDING HEIGHT (minimum)	10.5 metres and 3 STOREYS	**Phase 1:** 112.1 m & 35 storeys **Phase 2:** 97.2 m & 30 storeys
BUILDING HEIGHT (maximum)	105 metres and 30 STOREYS	**Phase 1: 112.1 m & 35 storeys** **Phase 2:** 97.2 m & 30 storeys
PODIUM Height (maximum)	27 metres and 6 storeys	22.4 m and 6 storeys
Elevator Penthouse Height (maximum)	6 metres	3.6 m
TOWER Separation measured from exterior face of the BUILDING,	a) 22 metres from a TOWER on the same LOT	a) 22 m b) **Phase 1: east = 9.0 m / west = 7.4 m**

including balconies (minimum) (see 7.10.4)	b) 11 metres from an INTERIOR LOT LINE	**Phase 2: east = 9.0 m / west = 7.5 m**
Horizontal TOWER Dimension (maximum)	40 metres	30.75 m
TOWER Footprint (maximum)	1,000 square metres	**Phase 1:** 765.6 m^2 **Phase 2:** 774.9 m^2
TOWER STEPBACK above PODIUM, including balconies, on the FRONT BUILDING FAÇADE and FLANKAGE BUILDING FAÇADE (minimum)	3 metres	3 m
COMMON OUTDOOR AREA (minimum)	For LOTS with an area of 2,000 square metres or more, three percent (3%) of the LOT AREA shall be COMMON OUTDOOR AREA located at GRADE 165.1 m^2	672 m^2
COMMON OUTDOOR AREA dimensions (minimum, each dimension)	Not less than 6.0 metres, except where the COMMON OUTDOOR AREA is located in the FRONT YARD or FLANKAGE YARD where one (1) dimension shall not be less than 4.0 metres	**4.6 m**
LANDSCAPED OPEN SPACE (minimum)	15% (825.6 m^2)	2,039.2 m^2
AMENITY AREAS (minimum)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT 3,236 m^2	8,203.8 m^2
COMMON AMENITY AREAS – 3.A.4.2 (minimum)	MIXED USE BUILDINGS WITH 50+ BEDROOMS: MIN 30% OF REQUIRED AMENITY AREA AS COMMON	2,095.8 m^2

	AMENITY AREA 970.8 m^2	
AMENITY AREA - 3.A.4.4. (maximum)	Notwithstanding anything to the contrary, a maximum twenty percent (20%) of the required AMENITY AREA may be outdoor rooftop amenity space (such as rooftop decks and terraces) located more than 22 metres above GRADE. **Phase 1:** 349.4 m^2 **Phase 2:** 297.8 m^2	**Phase 1:** 330 m^2 (18.8%) **Phase 2:** **526 m^2 (36%)**
RAILWAYS - 3.R.1.1 (minimum)	Notwithstanding anything to the contrary, no PERSON shall erect, enlarge, or reconstruct any BUILDING in whole or in part within fifteen metres (15m) of a railway right-of-way.	Not Applicable
Parking		
Residential Parking (minimum)	0 (MTSA)	100 spaces
Visitor Parking (minimum)	0 (MTSA)	
Non-Residential Parking (minimum)	0 (MTSA)	
Accessible Parking (minimum)	Prov. Parking Range: 76-100 Type A: 2 Type B: 2	Type A: 2 Type B: 2
Bicycle Parking for Residential Uses (minimum)	Type A: 0.3 spaces per dwelling unit = 246 spaces Type B: 0.3 spaces per dwelling unit = 246 spaces	Type A: 479 spaces Type B: 51 spaces TOTAL: 530 spaces
Bicycle Parking for Non-Residential Uses (minimum)	a) BICYCLE PARKING spaces shall be provided at a minimum rate of 0.8 BICYCLE PARKING SPACES per 100 square metres of non-residential	Type A: 5 spaces

	BUILDING FLOOR AREA excluding STRUCTURED PARKING. This requirement may be satisfied as TYPE A BICYCLE PARKING and or TYPE B BICYCLE PARKING, except as specified in section 6.6.2.c.).i.).B.). = 4 spaces b) where non-residential BUILDING FLOOR AREA exceeds 2,400 square metres, a minimum fifty percent (50%) of the required BICYCLE PARKING shall be provided as TYPE A BICYCLE PARKING.	
EV Parking (minimum)	0-19 surface parking spaces = 0 spaces	0 spaces (3 surface parking spaces)
EV Parking (minimum) - Visitor	Where Electric Vehicle Parking is required in Table 6C for a residential USE, a minimum of 50% of the required spaces shall be VISITOR PARKING SPACES.	Not Applicable
Loading Spaces for Residential Uses (minimum) (Z-25-09)	Two (2) Type A Loading Spaces where 301 or more UNITS are proposed.	2 Type B
Loading Spaces for Non-Residential Uses (minimum)	One (1) TYPE B where 250–2,500 m² of non-residential building floor area	2 Type B
Underground parking front yard building line setback (minimum)	4.0 m	**1.0 m**

Based on the table above, the following Site-Specific Provisions would be required for the proposed SAMU-105 Zone on the 170 Columbia St W site:

- Permit a minimum of 2 m^2 of non-residential Building Floor Area for every 158.7 square metres of Habitable Floor Space for Phases 1 and 2;

- Permit a Maximum Density of 2,197 bedrooms per hectare for Phases 1 and 2, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.1 metres or 35 storeys for Phase 1, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 9.0 for Phase 1, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (West) of 7.4 metres for Phase 1, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 9.0 for Phase 2, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (West) of 7.5 metres for Phase 2, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Common Outdoor Area dimension of 4.6 metres, whereas the Zoning By-law requires a minimum of 6.0 metres;
- Permit a Maximum Amenity Area of 36% for outdoor rooftop amenity space, whereas the Zoning By-law requires a maximum of 20%; and,
- Permit a Minimum Underground Parking Front Yard Building Line Setback of 1.0 metres, whereas the Zoning By-law requires a minimum of 4.0 metres.

180 Columbia Street West (Phases 3 to 5)

The following table assesses the SAMU-105 Zone Performance Standards outlined in Tables 9S.-G and 9S-H of the Zoning By-Law in relation to the proposed development (Phases 3, 4 and 5) on the 180 Columbia St W site. Regulations in **red** denote Site-Specific Relief:

Regulation	**Requirement**	**Proposed**
LOT FRONTAGE (minimum)	20 metres	52.24 m
STREET LINE setback (minimum)	4 metres	**0.8 m**
STREET LINE setback (maximum)	75% of the STREET LINE BUILDING FAÇADE shall be within 6.0 metres of the STREET LINE	61%
SIDE YARD setback (minimum)	3 metres	**Phase 3** **East Yard: 1.2 m** West Yard: 9.0 m **Phase 4** East Yard: 3.6 m West Yard: 9.5 m **Phase 5**

		East Yard: 3.6 m West Yard: 9.5 m
REAR YARD setback (minimum)	3 metres	9.5 m
Non-Residential Uses (minimum)	For LOTS with more than 1,000 DWELLING UNITS, the minimum BUILDING FLOOR AREA for non-residential uses in 9S.3.1, excluding STRUCTURED PARKING, shall be 2.0 square metres per DWELLING UNIT, and 1.0 square metre per DWELLING UNIT in all other instances. 822 m^2	**Phase 3:** 277 m^2 **Phase 4:** 2,055 m^2 **Phase 5:** 130 m^2 **TOTAL: 2,462 m^2 (2 m^2 of non-residential Building Floor Area for every 43 square metres of Habitable Floor Space)**
Number of BUILDINGS on a LOT (maximum)	More than one (1) main BUILDING permitted	3
Density (maximum)	900 BEDROOMS per hectare	**2,201 bedrooms per hectare**
Height of FIRST STOREY (minimum)	4 metres	7 metres
BUILDING HEIGHT (minimum)	10.5 metres and 3 STOREYS	**Phase 3:** 112.13 m & 35 storeys **Phase 4:** 82.0 m & 25 storeys **Phase 5:** 97.25 m & 30 storeys
BUILDING HEIGHT (maximum)	105 metres and 30 STOREYS	**Phase 3: 112.1 m & 35 storeys** **Phase 4:** 82.0 m & 25 storeys **Phase 5:** 97.25 m & 30 storeys
PODIUM Height (maximum)	27 metres and 6 storeys	**Phase 3 & 5:** 22.4 m and 6 storeys **Phase 4:** 13.4 m and 4 storeys
Elevator Penthouse Height (maximum)	6 metres	3.6 m
TOWER Separation measured from exterior face of the BUILDING, including balconies (minimum) (see 7.10.4)	a) 22 metres from a TOWER on the same LOT b) 11 metres from an INTERIOR LOT LINE	a) 22.0 m b) **Phase 3: east = 4.5 m** / west = 12.01 m

		Phase 4: east = 6.7 m / west = 12.01 m **Phase 5: east = 6.6 m** / west = 12.01 m
Horizontal TOWER Dimension (maximum)	40 metres	30.7 m
TOWER Footprint (maximum)	1,000 square metres	773.6 m^2
TOWER STEPBACK above PODIUM, including balconies, on the FRONT BUILDING FAÇADE and FLANKAGE BUILDING FAÇADE (minimum)	3 metres	3 m
COMMON OUTDOOR AREA (minimum)	For LOTS with an area of 2,000 square metres or more, three percent (3%) of the LOT AREA shall be COMMON OUTDOOR AREA located at GRADE 229.08 m^2	531.0 m^2
COMMON OUTDOOR AREA dimensions (minimum, each dimension)	Not less than 6.0 metres, except where the COMMON OUTDOOR AREA is located in the FRONT YARD or FLANKAGE YARD where one (1) dimension shall not be less than 4.0 metres	16.0 m
LANDSCAPED OPEN SPACE (minimum)	15% (1,145.4 m^2)	1,905.5 m^2
AMENITY AREAS (minimum)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT 4,449 m^2	10,447.8 m^2
COMMON AMENITY AREAS – 3.A.4.2 (minimum)	MIXED USE BUILDINGS WITH 50+ BEDROOMS: MIN	1,919.8 m^2

	30% OF REQUIRED AMENITY AREA AS COMMON AMENITY AREA 1,334.7 m^2	
AMENITY AREA - 3.A.4.4. (maximum)	Notwithstanding anything to the contrary, a maximum twenty percent (20%) of the required AMENITY AREA may be outdoor rooftop amenity space (such as rooftop decks and terraces) located more than 22 metres above GRADE. **Phase 3:** 348.6 m^2 **Phase 4:** 210.4 m^2 **Phase 5:** 330.8 m^2	**Phase 3: 477.0 m^2 (28%)** **Phase 4: 361.0 m^2 (35%)** **Phase 5: 465.0 m^2 (29%)**
RAILWAYS - 3.R.1.1	Notwithstanding anything to the contrary, no PERSON shall erect, enlarge, or reconstruct any BUILDING in whole or in part within fifteen metres (15m) of a railway right-of-way.	**9.0 m (west)**
Parking		
Residential Parking (minimum)	0 (MTSA)	309 spaces
Visitor Parking (minimum)	0 (MTSA)	
Non-Residential Parking (minimum)	0 (MTSA)	
Accessible Parking (minimum)	Prov. Parking Range: 301-350 Type A: 4 Type B: 5	Type A: 6 Type B: 9
Bicycle Parking for Residential Uses (minimum)	Type A: 0.3 spaces per dwelling unit = 325 spaces Type B: 0.3 spaces per dwelling unit = 325 spaces	Type A: 651 spaces Type B: 31 spaces TOTAL: 682 spaces

Bicycle Parking for Non-Residential Uses (minimum)	a) BICYCLE PARKING spaces shall be provided at a minimum rate of 0.8 BICYCLE PARKING SPACES per 100 square metres of non-residential BUILDING FLOOR AREA excluding STRUCTURED PARKING. This requirement may be satisfied as TYPE A BICYCLE PARKING and or TYPE B BICYCLE PARKING, except as specified in section 6.6.2.c.).i.).B.). = 15 spaces b) where non-residential BUILDING FLOOR AREA exceeds 2,400 square metres, a minimum fifty percent (50%) of the required BICYCLE PARKING shall be provided as TYPE A BICYCLE PARKING.	Type A: 17 spaces
EV Parking (minimum)	0-19 surface parking spaces = 0 spaces	0 spaces (15 surface parking spaces)
EV Parking (minimum) - Visitor	Where Electric Vehicle Parking is required in Table 6C for a residential USE, a minimum of 50% of the required spaces shall be VISITOR PARKING SPACES.	Not Applicable
Loading Spaces for Residential Uses (minimum) (Z-25-09)	Two (2) Type A Loading Spaces where 301 or more UNITS are proposed.	3 Type B
Loading Spaces for Non-Residential Uses (minimum)	Two (2) TYPE B where 2,501–4,000 m² of non-residential building floor area	3 Type B

Underground parking front yard building line setback (minimum)	4.0 m	**1.0 m**

Based on the table above, the following Site-Specific Provisions would be required for the proposed SAMU-105 Zone on the 180 Columbia St W site:

- Permit a Minimum Street Line Setback of 0.8 metres for Phase 3, whereas the Zoning By-law requires 4.0 metres;
- Permit a Minimum Side Yard (East) Setback of 1.2 metres for Phase 3, whereas the Zoning By-law requires 3.0 metres;
- Permit a minimum of 2 m^2 of non-residential Building Floor Area for every 43 square metres of Habitable Floor Space;
- Permit a Maximum Density of 2,201 bedrooms per hectare for Phases 3, 4 and 5, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.1 metres or 35 storeys for Phase 3, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 4.5 metres for Phase 3, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 6.7 metres for Phase 4, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 6.6 metres for Phase 5, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Maximum Amenity Area of 35% for outdoor rooftop amenity space, whereas the Zoning By-law requires a maximum of 20%;
- Permit a Minimum Setback of 9.0 metres of a railway right-of-way, whereas the Zoning By-law requires a minimum of 15.0 metres; and
- Permit a Minimum Underground Parking Front Yard Building Line Setback of 1.0 metres, whereas the Zoning By-law requires a minimum of 4.0 metres.

ii. Holding Provision (H)

The Subject Lands are subject to a Holding Provision (H) due to the Site being within 75 metres of the rail corridor. It is understood that the holding symbol (H) shall not be removed or modified until it is demonstrated by a qualified professional engineer that there will be:

a) Sufficient buffer from railway operations to dissipate rail-oriented emissions, vibrations, and noise;
b) No adverse impacts to the sensitive uses; and
c) A sufficient safety barrier from railway operation and potential derailments to the satisfaction of the City and any other authority having jurisdiction.

Planning Comment: As summarized in Section 8 of this Report, an updated Transportation Noise and Vibration Assessment and a Development Viability Assessment / Rail Safety and Risk Mitigation Study were prepared by Dillon Consulting Limited in support of the proposed

development. The updated technical work specifically considers the proximity of the proposed development to both ION LRT and freight rail operations, including the proposed 9-metre railway setback at 180 Columbia Street West.

The Transportation Noise and Vibration Assessment confirms that measured vibration associated with ION LRT operations is below the applicable criterion. Freight rail monitoring identified vibration above the applicable criterion and, accordingly, recommends that appropriate mitigation measures, such as trenching and/or building isolation, be developed through detailed design at the Site Plan Approval stage. In addition, the Rail Safety and Risk Mitigation Study specifically assesses the reduced setback and concludes that the proposed development presents an acceptable level of risk based on current and forecast railway operations. The Study concludes that there is no safety concerns associated with the proposed setback that would warrant additional derailment protection in the form of a crash wall or berm.

Accordingly, the updated technical studies demonstrate that the matters underlying the existing Holding Provision can be appropriately addressed. However, given that certain detailed noise and vibration mitigation measures are to be finalized as the building and site design advances, it remains appropriate to maintain the existing railway-related Holding Provision, with its ultimate removal to occur once the required mitigation and detailed design measures have been confirmed to the satisfaction of the City and other applicable authorities through the subsequent approval process.

Notwithstanding the above, and as previously noted in this Report, the applicant is also requesting that additional Holding Provisions be applied to the Subject Lands at both 170 and 180 Columbia Street West to address the following matters:

- No development shall be permitted until such time as a Record of Site Condition is submitted and acknowledged to the satisfaction of the Ministry of the Environment, Conservation and Parks or any successor Ministry; and

- No development exceeding 410 metres above sea level shall be permitted until such time as an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

iii. Lot Line Interpretation

A Site-Specific Provision is requested to clarify that the internal boundaries shown between the individual development phases within 170 Columbia Street West and 180 Columbia Street West are phasing lines only and shall not be interpreted as lot lines for the purposes of applying the Zoning By-law.

The requested provision reflects the comprehensive and master-planned nature of the proposed development and its anticipated phased implementation. The Subject Lands comprise two (2) separate properties, with Phases 1 and 2 located on 170 Columbia Street West and Phases 3, 4 and 5 located on 180 Columbia Street West. Each of these properties will continue to be treated as a separate lot for zoning purposes, with the applicable zoning regulations and statistics assessed independently for 170 Columbia Street West and 180 Columbia Street West.

Within each property, however, the development will be constructed incrementally through multiple phases. The boundaries identified between Phases 1 and 2 and between Phases 3, 4

and 5 are intended to facilitate the orderly staging and implementation of development and are not intended to establish separate zoning lots. Accordingly, zoning requirements applicable to each property, including matters such as density, parking, amenity area, Common Outdoor Area, landscaped open space and other applicable site statistics, will be calculated on the basis of the respective property as a whole, rather than independently for each development phase.

This distinction is particularly important given that individual phases within each property are intended to function in a coordinated manner and may share access, circulation, parking, servicing, landscaped areas, amenity areas and other site functions. Requiring each individual phase to independently comply with all applicable zoning regulations could result in artificial zoning deficiencies or unnecessary duplication of facilities notwithstanding that the phases form part of a comprehensively planned development on the same lot.

The requested provision does not alter or disregard the existing property line between 170 and 180 Columbia Street West. Where a zoning regulation requires a setback, separation or other measurement from a lot line, the applicable legal property lines of each respective property will continue to constitute lot lines and will be used for the purposes of that measurement. This includes the existing property line separating 170 and 180 Columbia Street West. The provision is intended only to clarify that the internal phasing lines shown within each of the two (2) properties do not constitute lot lines for zoning purposes.

From a planning perspective, this approach provides a practical and appropriate regulatory framework for a comprehensively planned development that will be implemented incrementally over five (5) phases. It maintains 170 and 180 Columbia Street West as two distinct zoning lots, while ensuring that the administrative division of each property into development phases does not inadvertently affect zoning compliance or create artificial deficiencies as individual phases are constructed.

Accordingly, the requested Site-Specific Provision appropriately distinguishes between the existing legal property boundaries, which will continue to function as lot lines, and the internal phasing boundaries, which are intended solely to facilitate the sequencing and implementation of development. This provides appropriate flexibility for phased development while maintaining clear and consistent application of the Zoning By-law to each of the two properties.

iv. Amenity Area Definition

A Site-Specific Provision is requested to amend the application of the “Amenity Area” definition to recognize the proposed at-grade outdoor amenity space located to the rear of Phase 2. The proposed space has characteristics that overlap with both the existing “Amenity Area” and “Common Outdoor Area” definitions in the Zoning By-law and, accordingly, the Site-Specific Provision is intended to provide clarity regarding how the space is to be treated for zoning purposes.

The existing Amenity Area definition generally contemplates areas designed for the active and passive recreation of residents and tenants of a building, including outdoor patios, balconies, communal indoor recreational and social spaces, swimming pools, and outdoor rooftop amenity areas. While the proposed Phase 2 space is consistent with the recreational intent of this

definition, the By-law does not expressly contemplate a comprehensively programmed at-grade outdoor resident amenity area. Conversely, the Common Outdoor Area definition more broadly contemplates outdoor gathering spaces for employees, occupants and visitors. However, the Phase 2 space is not intended to function as a public gathering space in the same manner as the Common Outdoor Areas proposed elsewhere within the development.

The proposed Phase 2 outdoor space is intended to function as an extension of the building's resident amenity facilities and will be located immediately adjacent to indoor amenity space. While the detailed programming will be determined through the future Site Plan Application, the area is presently contemplated to accommodate uses such as outdoor seating and gathering areas, barbeques, children's play areas, outdoor exercise or yoga, landscaping, and other active and passive recreational activities. The space is also intended to be fenced, reinforcing its private amenity function and clearly distinguishing it from the municipal parkland proposed immediately to the north.

The applicant has discussed the appropriate zoning treatment of this space with City staff, who acknowledged that, depending on its ultimate programming, the area exhibits characteristics of both an Amenity Area and a Common Outdoor Area and recommended that its treatment be clarified through a Site-Specific Provision. Accordingly, the requested provision would expressly permit an at-grade outdoor area designed and maintained for the recreational use of residents and their guests to qualify as an Amenity Area. The provision would also clarify that an area counted as an Amenity Area under this permission would not also be counted toward the Common Outdoor Area requirement, thereby avoiding any duplication in the applicable zoning calculations.

From a planning perspective, the requested provision does not reduce the amount, quality, or functionality of amenity space provided to future residents. Rather, it recognizes a form of at-grade outdoor amenity space that serves the same recreational purpose as other forms of Amenity Area expressly contemplated by the By-law. The provision also maintains flexibility for the detailed design and programming of the space to evolve through Site Plan Approval without unnecessarily prescribing individual recreational features at the zoning stage.

7. LAND USE PLANNING RATIONALE

This section of the Report builds of the previous sections and provides land use planning opinion with regards to the site-specific planning regulations proposed to accommodate the contemplated development. These site-specific requests include modifications to building height, density, podium height, and landscaped open space requirements. Each requested provision has been carefully considered in relation to the Provincial Planning Statement, the Region of Waterloo Official Plan, and the City of Waterloo Official Plan, including the recently approved OPA 58. Collectively, the requested modifications represent good planning, are in the public interest, and support the broader objectives of sustainable, transit-oriented, and complete community development.

a) Alignment with Overarching Planning Framework

Based on the analysis provided in Section 6 of this Report, it is our opinion that the proposed development demonstrates clear regard for the "Matters of Provincial Interest" outlined in the *Planning Act*, is consistent with the Provincial Planning Statement, and conforms to the Region of Waterloo Official Plan and the general intent of the City of Waterloo Official Plan, notably the direction of Council-adopted OPA 58. The proposed multi-phased development represents an appropriate and strategic form of intensification on an underutilized site within a designated Major Node and within the broader MTSA surrounding the Research and Technology LRT Station, as well as the University of Waterloo LRT Station.

The proposed 5-phase development, consisting of five (5) high-rise residential towers with podiums and commercial/retail space at grade, and on Level 2, supports the efficient use of land and infrastructure, promotes compact urban form, and contributes to the creation of a complete, transit-oriented community. The Site's location within the proposed 'Station Area Mixed-Use' designation (per OPA 58 and requested as part of this Official Plan Amendment) and its proximity to the University of Waterloo, Wilfrid Laurier University, and multiple GRT and ION LRT stops ensures that it is well positioned to support transit-oriented development principles, sustainable transportation, and minimized automobile reliance.

While the proposed Official Plan and Zoning By-law Amendments are required to accommodate aspects such as setbacks, non-residential floor area, density, podium and tower heights, tower separation, rooftop amenity space, and railway separation, the overall form, function, and intent of the proposal are aligned with the City's vision for strategic growth areas. The development implements provincial and local growth management objectives by delivering high-quality residential intensification, ground-floor retail uses to support pedestrian activity, large common outdoor areas to enhance the liveability, and a balanced transportation approach that emphasizes walkability, cycling, and transit use.

b) Efficient Use of Infrastructure and Municipal Services

The proposed development represents an efficient and sustainable use of land and municipal infrastructure, fully in alignment with the PPS, Region of Waterloo Official Plan and City of Waterloo Official Plan. The Site is located within the City's delineated Urban Area, along an existing urban street network, and is already serviced with available water, sanitary, and stormwater infrastructure. Development at this location leverages significant prior public

investments, particularly in the ION LRT system, regional road improvements, and existing municipal servicing networks.

As a compact, high-density, mixed-use development, the proposal directly supports the PPS policy direction for intensifying within built-up areas that are serviced and transit-connected. The project integrates a substantial number of secure bicycle parking spaces, two (2) levels of underground parking to minimize surface parking impacts, and strong pedestrian connections throughout the Site that enhance pedestrian circulation and urban vitality.

The Subject Lands are within walking and cycling distance of key institutions, employment areas, and a range of services, which will help reduce private vehicle dependency. The design promotes active transportation modes and provides convenient access to existing GRT bus routes and the ION LRT line, contributing to a sustainable, multimodal transportation network. Overall, the development exemplifies efficient land use, maximizes existing infrastructure capacity, and supports Waterloo's goals of building a resilient, compact, and transit-supportive city.

c) Density

The proposed density reflects a contemporary approach to planning within Major Nodes and MTSAs, recognizing the necessity for compact, transit-supportive, and higher-density developments. The PPS directs municipalities to optimize land and infrastructure investments, while the Region of Waterloo Official Plan similarly encourages intensification that leverages the Region's investment in transit infrastructure.

Notably, as part of the approved OPA 58, the City removed the requirement for a maximum density measured in bedrooms per hectare within the 'Station Area Mixed-Use' designation. This change represents a clear policy direction acknowledging that density limits are not conducive to achieving the Province's growth, transit-supportive, and housing supply objectives in strategic intensification areas. The proposed development is therefore aligned and consistent with this emerging approach, focusing on built form, height, massing, and urban design performance rather than a strict numerical density cap.

The proposed density supports the principles of sustainable growth by concentrating residential units in proximity to transit, educational institutions (such as the University of Waterloo and Wilfrid Laurier University), and employment opportunities, thereby reducing reliance on private automobiles. Although the requested density significantly exceeds the standard requirement in the Zoning By-law, the Site is appropriately situated to accommodate the proposed level of intensification without undue impact on surrounding land uses. The density is also tempered through thoughtful design strategies including high-quality open spaces, active ground-floor uses, and bicycle parking to support active transportation choices.

The development pattern envisioned is consistent with the City of Waterloo's long-term growth management goals and urban design expectations as set out in OPA 58, particularly the policies emphasizing vibrant, complete, and pedestrian-oriented communities in strategic growth areas.

d) Height and Massing

The requested increase in maximum building height aligns with the City's intensification and urban structure objectives for Major Nodes and MTSAs, as articulated in Provincial policy and the direction of OPA 58. These areas are specifically intended to accommodate significant

intensification, a vibrant mix of uses, and taller built forms to support higher-order transit infrastructure. The proposed height efficiently utilizes the Subject Lands, which are strategically located along Columbia Street West within a walkable distance to the ION LRT corridor and multiple transit routes.

Further, it reflects the Council-adopted vision for growth in these areas. OPA 58 proposes to increase the maximum height permissions within the 'Station Area Mixed-Use' designation to 30 storeys, signaling a clear policy shift toward supporting taller buildings in strategic growth areas, particularly within MTSAs. The proposed 35 storeys (a 5-storeys increase) align with this emerging direction by facilitating greater intensification in key locations identified for substantial growth under both local and provincial policy frameworks.

Permitting additional height allows for vertical intensification without expanding the urban footprint, consistent with the Provincial Planning Statement, as well as the Region of Waterloo Official Plan and City of Waterloo Official Plan which encourage efficient development patterns and intensification near transit. Furthermore, the proposed building massing has been thoughtfully designed with podiums and step-backs to maintain human-scale interactions along the streetscape and to mitigate shadow, wind, and visual impacts. As such, it is our opinion that the additional height supports the Region's and City's goals for vibrant, complete communities while providing an enhanced urban form appropriate for a designated intensification area.

In support of the proposed maximum building height of 35 storeys, it is important to consider recent development precedents within MTSAs across the Region of Waterloo. As the Region continues to evolve under a policy framework that emphasizes intensification, compact urban form, and transit-oriented development, a number of tall building approvals have been advanced within or near MTSAs. These precedents illustrate a growing acceptance of high-rise, mixed-use development in strategic locations that offer high connectivity, underutilized land, and access to higher-order transit. The examples below demonstrate how similar or greater building heights have been approved in a range of contexts within the Region, many in locations less centrally positioned or accessible than the subject Site at 170 and 180 Columbia Street West.

The redevelopment of the former Kraus Carpet Factory lands at 525-565 Conestogo Road W, located within the Conestoga Station MTSA, consists of a maximum height of 35 storeys (Figure 17, p. 81). It is notable that this site is situated on the periphery of the MTSA boundary and further removed from the station platform than the Subject Lands at 170 and 180 Columbia Street West. Despite its peripheral location, the significant tower height is supported due to the site's scale, redevelopment potential, and access to transit. This sets a strong precedent for supporting comparable heights on sites like the Subject Lands that are not only within the MTSA boundary but are more centrally located and in closer proximity to two (2) ION stations, further strengthening the case for the proposed 35-storey towers.

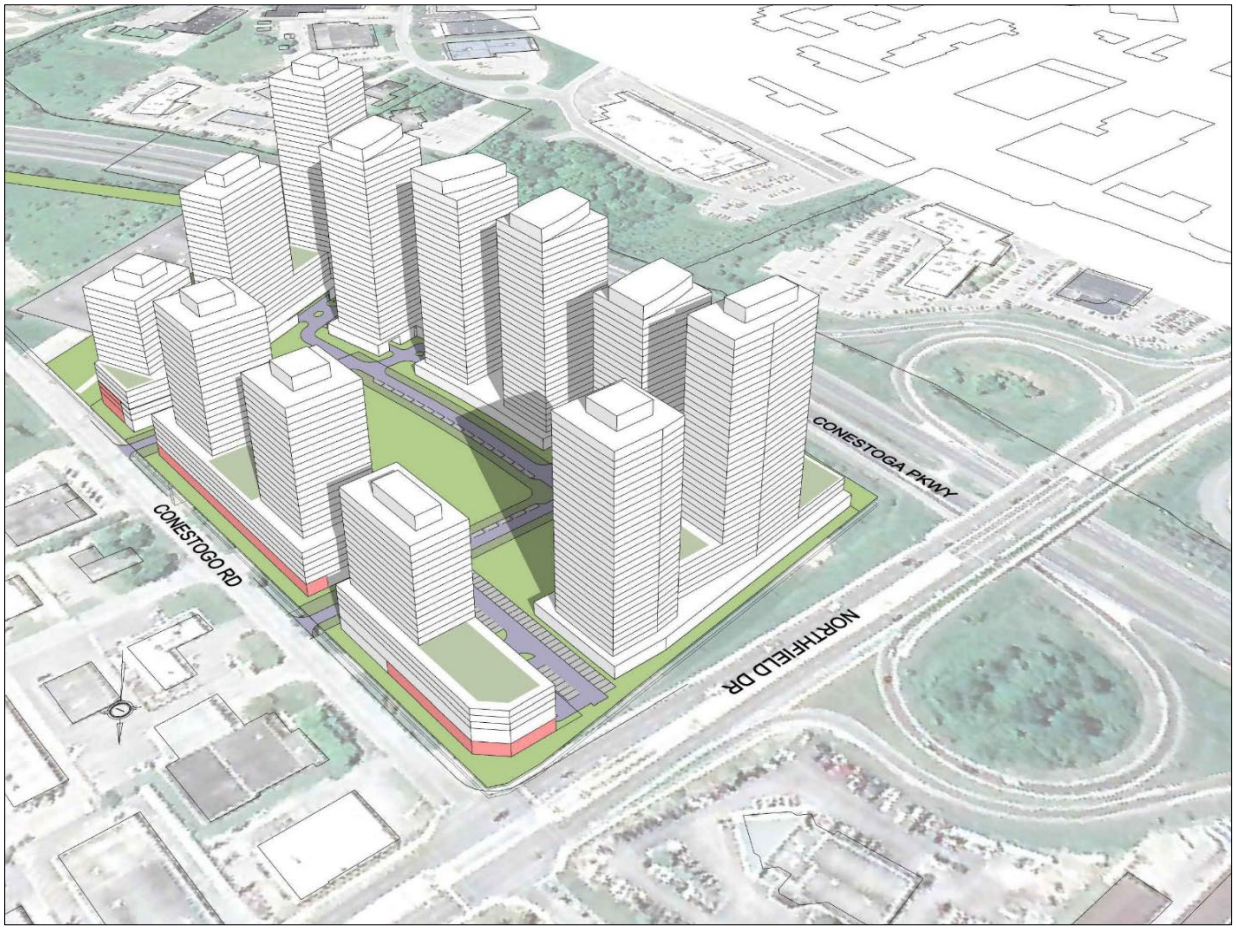


Figure 17: *525-565 Conestogo Road W, Waterloo – 3D Renderings (Source: Turner Fleischer)*

Located within the Central Station MTSA in Kitchener, 615 King Street W (Station Park Tower E) has been proposed at 50 storeys (Figure 18, p. 82). The tower is one of the tallest proposed within the Region and is being advanced within the context of a rapidly intensifying MTSA that is envisioned for substantial growth. The Subject Lands at Columbia Street West similarly benefit from exceptional transit access, adjacency to institutional and employment lands, and alignment with Provincial growth objectives, supporting the rationale for a tall building form of 35 storeys.



Figure 18: *615 King Street W, Kitchener – 3D Renderings (Source: KIRKOR Architects and Planners)*

The site at 200 Victoria Street South was approved for a 45-storey high-rise through an Official Plan Amendment and Zoning By-law Amendment, despite being located on the periphery of the Central Station MTSA (Figure 19, p. 83). The City supported this increased height on the basis of its proximity to transit, redevelopment potential, and contribution to the MTSA density objectives. This precedent is particularly relevant to the subject Site, as 170 and 180 Columbia Street West are on the periphery (south end of the Research and Technology MTSA), but are within a short walking distance of both the University of Waterloo and Research and Technology ION stations. The support for taller buildings on the periphery of an MTSA further reinforces that 35 storeys are both appropriate and consistent with emerging patterns of intensification within Waterloo Region's strategic growth areas.



Figure 19: *200 Victoria Street S, Kitchener – 3D Renderings (Source: Arcadis)*

e) Tower Separation from Interior Lot Lines

The proposed reductions to the minimum tower separation distances from the interior lot lines are considered appropriate and reflect a coordinated, context-sensitive approach to the development of the Subject Lands. The requested relief recognizes the physical constraints and configuration of the two (2) properties while maintaining appropriate overall separation between existing, proposed, and potential future towers. In particular, the requested setbacks should be considered together with the actual physical separation achieved between towers, rather than solely in relation to individual property lines.

With respect to 170 Columbia Street West (Phases 1 and 2), the following site-specific relief is requested:

- **Phase 1 -** 9.0 metres from the east interior lot line;
- **Phase 1 -** 7.4 metres from the west interior lot line;
- **Phase 2 -** 9.0 metres from the east interior lot line; and
- **Phase 2 -** 7.5 metres from the west interior lot line.

The requested western setbacks for Phases 1 and 2 are appropriate when considered in conjunction with the coordinated development of the adjacent 180 Columbia Street West lands. The towers across the two (2) properties have been deliberately positioned to maintain an appropriate physical separation notwithstanding the reduced setbacks from the common property boundary. The existing approximately 9.0-metre-wide drive aisle and vehicular access easement extending between the two (2) properties also provides physical separation for this area. As such, the reduced setbacks from the individual lot lines do not translate into an equivalent reduction in the actual separation between tower forms and will not result in adverse impacts to privacy, overlook, daylight, or the sky-view.

The requested 9.0-metre eastern setback for Phase 1 is similarly appropriate having regard to the physical context along the eastern boundary of 170 Columbia Street West. The proposed internal/public right-of-way system provides additional physical separation between the Phase 1 tower and the adjacent lands to the east. This corridor limits the potential for future tower development immediately adjacent to the property boundary and provides additional space beyond the proposed tower setback. Accordingly, the requested reduction from 11.0 metres to 9.0 metres will continue to provide an appropriate relationship with the adjacent property and sufficient opportunity to accommodate compatible future development.

With respect to 180 Columbia Street West (Phases 3 to 5), the following eastern interior lot line setbacks are proposed:

- **Phase 3 -** 4.5 metres;
- **Phase 4 -** 6.7 metres; and
- **Phase 5 -** 6.6 metres.

Although these represent greater reductions from the individual lot line requirement, they are considered in the context of the coordinated master plan for both properties. The 170 and 180 Columbia Street West lands are being planned comprehensively by the same applicant, allowing tower placement, orientation, and separation to be considered across the development as a whole. The towers have been deliberately arranged so that the reduced lot-line setbacks do not result in an inappropriate tower-to-tower relationship. The intervening drive aisle and access easement provide additional physical separation and ensure that the space between the two properties remains open and functional.

The configuration of the 180 Columbia Street West lands is also influenced by the ION LRT and railway corridor along the western boundary, which significantly constrains the location of tower forms on the property. The western portion of the Site must accommodate appropriate railway separation and associated operational considerations, limiting the ability to shift Phases 3, 4 and 5 further west. The requested eastern setbacks therefore represent an appropriate response to competing Site constraints while allowing the lands to accommodate the high-density, transit-supportive development contemplated for the Major Transit Station Area.

Importantly, the requested relief regulates tower separation from a property line rather than tower separation between buildings. The purpose of the 11.0-metre interior lot line requirement is

principally to ensure that appropriate tower separation can ultimately be achieved where adjoining properties are developed independently. In this instance, the development of both properties has been coordinated through a single master plan, allowing the actual relationship between towers to be appropriately designed at the zoning stage. The requested setbacks therefore do not undermine the intent of the regulation simply because the resulting separation is distributed unevenly on either side of the applicable property boundary.

f) Street Line and Side Yard Setbacks

The proposed site-specific provisions for street line and side yard setbacks are appropriate and maintain the intent of the applicable zoning standards while responding to the configuration of the subject lands and the comprehensive site design. The requested relief includes: (i) a minimum street line setback of 0.8 metres for the Phase 1 building at 170 Columbia Street West along Columbia Street West, whereas 4.0 metres is required; and (ii) a minimum east side yard setback of 1.2 metres for the Phase 3 building at 180 Columbia Street West, whereas 3.0 metres is required.

With respect to Phase 1, the proposed 0.8-metre street line setback is limited to the building's relationship with the Columbia Street West frontage and reflects the configuration of the property and the proposed placement of the building within the broader master plan. Notwithstanding the reduced setback, the Phase 1 building will maintain a strong pedestrian-oriented relationship with Columbia Street West through active ground-floor uses, transparent glazing, building articulation, pedestrian connections and landscaping. The reduced setback therefore reinforces, rather than detracts from, the intended urban character of the Station Area by positioning the building close to the street and contributing to a defined and active street edge.

The requested 1.2-metre east side yard setback for Phase 3 similarly responds to the configuration of the 180 Columbia Street West property and the coordinated placement of buildings, circulation areas and open spaces across the development. The reduction is localized and does not compromise the functionality of the site or result in adverse impacts associated with building access, pedestrian circulation or servicing. Appropriate separation from surrounding development will continue to be maintained through the broader site organization and applicable tower separation requirements.

Importantly, the requested setbacks have been considered as part of the overall master plan rather than as isolated reductions. The development has been comprehensively designed across 170 and 180 Columbia Street West, with building placement coordinated with internal circulation, amenity areas, landscaped areas, the municipal parkland dedication and other site functions. The requested relief allows the buildings to be appropriately positioned within this framework while maintaining a high-quality public realm and functional site design.

Overall, the proposed 0.8-metre street line setback for Phase 1 and 1.2-metre east side yard setback for Phase 3 represent appropriate site-specific modifications that facilitate an efficient, compact and transit-supportive built form without compromising the underlying intent of the Zoning By-law.

g) Railway Setback

The requested reduction in the minimum setback from the railway right-of-way from 15 metres to 9 metres for the 180 Columbia Street West lands is appropriate and has been specifically

evaluated through the supporting technical studies. In particular, Dillon Consulting Limited prepared a Development Viability Assessment / Rail Safety and Risk Mitigation Study to assess the proposed development and reduced setback against the FCM-RAC Guidelines. The Study recognizes that the 9-metre setback represents a site-specific deviation from the standard 15-metre setback recommended for a Spur Line, however, it concludes that the proposed development is considered safe based on the characteristics and operations of the adjacent railway and the results of a quantitative risk assessment.

Importantly, the Study considers the actual arrangement of development within the setback area. The first approximately 9 metres adjoining the railway are occupied primarily by the proposed service road, loading area, parking ramp and open space, while residential occupancy is located above the Rail Proximity Envelope. The adjacent Waterloo Central Railway corridor is classified as a Spur Line, with approximately two freight trains operating during the nighttime period at low speeds. Dillon's quantitative assessment considered both current and forecast future rail traffic and found no exceedance of the applicable risk criteria for train derailment resulting in public fatality or a dangerous goods release requiring evacuation. The Study specifically concluded that there is no safety concerns associated with the proposed setback that would warrant a crash wall, berm or other additional physical derailment protection.

The updated Transportation Noise and Vibration Assessment also considers the adjacent freight railway and ION LRT operations. While measured vibration associated with the ION LRT is below the applicable criterion, freight train monitoring identified vibration above the applicable criterion and, accordingly, Dillon recommends that appropriate vibration mitigation, such as trenching and/or building isolation, be developed through detailed design at the Site Plan Approval stage. This demonstrates that the potential effects associated with railway proximity have been identified and can be appropriately addressed through building and site design rather than requiring the full 15-metre setback.

The proposed 9-metre setback also responds appropriately to the Site's urban and transit-oriented context. The Subject Lands are located within a Major Transit Station Area where compact development and efficient use of land and infrastructure are encouraged. Requiring the full railway setback would unnecessarily constrain the development potential of lands specifically intended to accommodate significant intensification, notwithstanding the site-specific technical evidence demonstrating that the reduced setback can be safely accommodated. The proposed setback, therefore, balances the efficient use of transit-supportive lands with appropriate protection of future residents and the continued safe operation of the adjacent railway.

Based on the findings of the supporting rail safety, noise and vibration assessments, the requested 9-metre railway setback is appropriate and maintains the intent of the zoning regulation. The reduced setback does not introduce an unacceptable public safety risk, and the remaining site-specific noise and vibration considerations can be appropriately addressed through the recommended mitigation measures and subsequent detailed design.

h) Rooftop Amenity Space

The requested site-specific provisions to permit a greater proportion of the required Amenity Area to be provided as outdoor rooftop amenity space are appropriate and maintain the intent of the Zoning By-law. The Zoning By-law permits a maximum of 20% of the required Amenity Area to be

accommodated as outdoor rooftop amenity space. The current proposal requires relief to permit up to 36%.

The requested relief reflects the vertical, high-density form of development proposed within the Research and Technology MTSA and the opportunity to make efficient use of building rooftops and podium areas for functional resident amenity space. Rooftop amenity areas provide usable outdoor space that complements the indoor amenity areas and at-grade outdoor spaces incorporated throughout the development, while avoiding the need to dedicate additional ground-level area that may otherwise be required for building access, circulation, landscaping, servicing, or other site functions.

Importantly, the proposal does not rely solely on rooftop amenity areas to satisfy the overall amenity needs of residents. A variety of indoor and outdoor amenity spaces are distributed throughout the development, including indoor communal spaces, at-grade resident amenity areas, Common Outdoor Areas, landscaped areas, and the proposed municipal parkland dedication. The rooftop amenity spaces therefore form part of a broader and diversified amenity network and are intended to supplement, rather than replace, the range of amenity opportunities available at grade and within the buildings.

The increased rooftop amenity proportions also provide an opportunity to create high-quality outdoor spaces with seating, landscaping, gathering areas and other passive or active recreational functions in locations that benefit from access to daylight and views. Detailed design matters, including wind mitigation, landscaping, screening, furnishings and programming, can be refined through the subsequent Site Plan Approval process to ensure the rooftop spaces are comfortable, safe and functional for residents.

Accordingly, the requested increase from the maximum 20% rooftop amenity area cap is an appropriate site-specific provision that responds to the high-density and transit-supportive nature of the development while continuing to provide a comprehensive and well-distributed amenity system across the subject lands.

i) Underground Parking Setback

The requested reduction in the minimum Underground Parking Front Yard Building Line Setback from 4.0 metres to 1.0 metre is appropriate and represents an efficient use of the below-grade portion of the Subject Lands without adversely affecting the intended streetscape or public realm.

The requested relief applies specifically to the underground parking structure and does not alter the location or setback of the above-grade building from the street. Accordingly, the reduced setback will have no perceptible impact on the relationship between the proposed buildings and Columbia Street West, including the provision of landscaping, pedestrian connections, building entrances, and the overall streetscape condition at grade. The underground structure will remain below grade and will therefore not contribute to building massing or create an adverse visual condition along the street.

The reduced setback also allows the underground parking structure to make more efficient use of the available Site area and accommodate the parking, circulation, and structural requirements associated with the proposed high-density development.

8. SUPPORTING STUDIES

This section of the Report outlines the supporting studies conducted as part of the complete application package for an Official Plan Amendment and Zoning By-Law Amendment application. The following table summarizes the supporting study or report, the party who completed the study, and the date of study completion.

Supporting Study	Name of Party	Date Completed
Urban Design Brief	Up Consulting Ltd.	May 2, 2025
Revised Functional Servicing & Stormwater Management Report	WalterFedy	July 31, 2026
Revised Transportation Impact Study	GHD	August 6, 2026
Revised Pedestrian Level Wind Study	The Boundary Layer Wind Tunnel Laboratory - The University of Western Ontario	August 7, 2026
Geotechnical Investigation	Chung & Vander Doelen Engineering Ltd.	February 5, 2025
Revised Transportation Noise and Vibration Assessment	Dillon Consulting Limited	August 6, 2026
Revised Land Use Compatibility Assessment	Dillon Consulting Limited	August 6, 2026
Development Viability Assessment (Rail Safety Report)	Dillon Consulting Limited	July 21, 2026
Shadow Study Analysis	Up Consulting Ltd.	May 2, 2025
Energy Strategy Report	S+A Footprint	April 29, 2025

In the subsections below, a summary of each study, report, or assessment will be described, including the party responsible, date of completion, and the impact they have on the proposed development.

a) Urban Design Brief

An Urban Design Brief was prepared by Up Consulting Ltd., as part of the original application submission. The Brief provided an overview of the urban design framework applicable to the site, the existing conditions of the property and its neighbourhood context and summarized how the design of the proposed development reflects the urban design objectives of the City of Waterloo Official Plan and Urban Design Manual.

b) Functional Servicing & Stormwater Management Report (Revised – July 2026)

A Functional Servicing and Stormwater Management Report (FSR) was prepared by WalterFedy, originally dated April 18, 2025, revised January 23, 2026, and most recently revised July 31, 2026, for the resubmission package. The updated Report reflects the revised development concept and phasing and provides an updated assessment of the proposed water, sanitary, storm servicing and stormwater management strategy.

The Report assesses the proposed five-phase development, consisting of two phases on the East Lands (170 Columbia Street West) and three phases on the West Lands (180 Columbia Street West). The servicing strategy provides independent storm, sanitary and water connections for Phase 1, Phase 2 and the West Lands, while existing connections through the shared access associated with 176 Columbia Street West are to be disconnected from the Subject Lands. This approach allows the East and West Lands to be independently serviced as development proceeds through the respective phases.

With respect to sanitary servicing, independent sanitary services are proposed for Phases 1 and 2, while Phases 3, 4 and 5 will be conveyed through internal mechanical plumbing to a single proposed municipal connection for the West Lands. The development is anticipated to generate a total sanitary flow of approximately 40.47 L/s, representing an increase of approximately 38.07 L/s over existing conditions. Importantly, the City of Waterloo has completed a sanitary capacity analysis for the proposed development, modelling an additional flow of 41.46 L/s, and confirmed that existing capacity is available to service the development. The Report also acknowledges the previously identified potential downstream constraint within the Lower Forwell Creek Trunk Sanitary Sewer and notes that its implications will continue to be considered through the City's broader sanitary sewer modelling and ongoing Master Plan update.

Water servicing is proposed through independent connections to the existing 300 mm diameter municipal watermain within Columbia Street West, with the existing connections to the private watermain within the shared access to be removed or abandoned. Hydraulic analysis, including a hydrant flow test, confirms that the municipal system appears sufficient to provide water servicing for the proposed development, including anticipated domestic and fire flow demands.

The revised Report also provides an updated stormwater management strategy. Storm servicing is anticipated to include separate connections to the municipal storm sewer on Columbia Street West for the East and West Lands, with major overland flows directed toward Columbia Street West. Post-development peak flows are required to be controlled to pre-development rates, and a Normal Level of Protection corresponding to 70% long-term total suspended solids removal is required for water quality treatment.

To provide the required quantity control, underground cisterns are proposed within Phases 1, 2 and 3, providing minimum storage volumes of approximately 143 m^3, 144 m^3 and 338 m^3, respectively. The proposed controls reduce post-development peak flows below pre-development peak flows for the assessed 2- through 100-year storm events. Water quality treatment will be

achieved through an Oil Grit Separator, other low-impact development measures, or a combination thereof, with the final design to be further refined through detailed design.

The Report further addresses site grading, erosion and sediment control, and construction dewatering. Major overland flows will be safely conveyed toward Columbia Street West, while erosion and sediment controls will be implemented during construction. Given the proposed underground parking and groundwater conditions, short-term construction dewatering may also be required and will be subject to applicable approvals and treatment requirements. Permanent groundwater discharge is not permitted by the Region, and the underground parking structures will therefore be appropriately waterproofed.

Overall, the revised FSR demonstrates that the proposed development can be appropriately serviced through existing municipal infrastructure, including confirmation from the City that sanitary capacity is available and confirmation through hydraulic analysis that the municipal water system appears sufficient to accommodate the development. The proposed stormwater management strategy provides appropriate quantity and quality controls, with detailed servicing and stormwater management design to continue to be refined through the subsequent Site Plan Approval process.

c) Transportation Impact Study (Revised – August 2026)

A Transportation Impact Study (TIS) was prepared by GHD, dated April 23, 2025, as part of the original application submission. A response/addendum letter was subsequently prepared on January 22, 2026, and most recently updated on August 6, 2026, to address the latest City of Waterloo and Region of Waterloo transportation comments and to reflect the current site plan. The August 2026 update includes revised trip generation, parking, access and traffic operations analyses based on the current development concept.

The current proposal consists of five residential towers containing 1,907 dwelling units (2,889 bedrooms), approximately 1,004 m² of ground-floor retail space and 1,963 m² of office space, with 409 parking spaces. Updated trip generation was prepared using ITE land use categories for high-rise multi-family housing in a dense multi-use urban setting close to rail transit, strip retail and general office uses. For a conservative assessment, GHD applied 45% of the estimated ITE vehicle trip generation, resulting in approximately 226 two-way vehicle trips during the weekday AM peak hour and 211 two-way vehicle trips during the weekday PM peak hour.

The updated traffic analysis confirms that the development can be accommodated by the surrounding road network under the 2032 total traffic condition. Access 1 is assessed under STOP control, while Access 2 is proposed as a right-in/right-out access to Columbia Street West. The analysis indicates that Access 1 operates at LOS C or better with v/c ratios of 0.49 or less, while Access 2 operates at LOS A with v/c ratios of 0.47 or less. GHD concludes that site-generated and background traffic can be accommodated by the abutting street system and that no roadway improvements are triggered by the proposed development.

The updated analysis also considers queuing conditions associated with the LRT crossing and the Phillip Street intersection. While existing/background queues may extend toward the Site

accesses during certain peak periods, the analysis concludes that Access 2 will not be blocked given its right-in/right-out configuration and that no material traffic operational concerns are expected.

With respect to parking, the Site is located within the Research & Technology Station Area and, accordingly, no minimum vehicular parking requirement applies to the residential, non-residential or visitor components under the current Zoning By-law. For comparison purposes, GHD estimates that approximately 45 vehicle parking spaces would be associated with the proposed retail and office uses under the previous parking standards.

Overall, the August 2026 TIS Response Letter confirms that the revised mixed-use development can be accommodated by the existing and planned transportation network. The proposed access configuration, including STOP control at Access 1 and right-in/right-out operation at Access 2, is considered operationally acceptable, and no road improvements are required as a result of the development. The updated analysis further confirms that the findings and recommendations of the original TIS remain generally valid for the current proposal.

d) Pedestrian Level Wind Study (Revised – August 2026)

A Pedestrian Level Wind Study was prepared by The Boundary Layer Wind Tunnel Laboratory - The University of Western Ontario, dated April 22, 2025, as part of the original application submission, and was revised August 7, 2026, as part of this resubmission package. The Study evaluates pedestrian-level wind safety and comfort conditions associated with the revised five-tower development, with tower heights ranging from 25 to 35 storeys. Wind tunnel testing assessed both the existing Site configuration and the proposed development in accordance with the City of Waterloo's Wind Study Terms of Reference. A total of 144 locations were tested for the proposed configuration, including ground-level pedestrian areas, sidewalks, building entrances and upper-level outdoor amenity spaces.

The Study notes that introducing a relatively tall, multi-tower development into the existing lower-rise context is expected to result in localized changes to wind conditions, particularly around and between the towers. The wind tunnel testing was undertaken without landscaping, meaning the results provide a somewhat conservative representation of anticipated conditions, particularly where trees and other landscape elements are proposed.

Key findings of the revised Study are as follows:

- All off-site tested locations satisfy the recommended pedestrian safety criterion. The development's influence on wind speeds generally diminishes away from the Site, with conditions at locations farther west, south and east remaining minimally affected.
- At ground level, Location 39 at the northwest corner of the Site, is the only location identified as exceeding the pedestrian safety criterion and will require mitigation. All other tested locations meet the applicable safety criterion.
- During the summer, wind conditions along surrounding sidewalks experience minimal changes, with all tested sidewalk locations suitable for standing or better. On-site

Locations 10 and 58 are suitable for walking, which is considered consistent with their intended use, while all remaining locations are suitable for standing or better.

- During the winter, several on-site areas, particularly those between adjacent towers, experience increased wind speeds. Locations 11, 19, 40, 42, 50, 53 and 54 near building entrances require mitigation to achieve standing conditions or better year-round. Surrounding sidewalks generally remain appropriate for their intended pedestrian use.
- All rooftop amenity locations are suitable for standing or sitting during the summer. During winter, several remain suitable for standing or sitting, while others are categorized as suitable for walking. Location 136, which is located near a doorway, may require mitigation if regular winter use is anticipated.
- The ground-level Common Outdoor Areas and Outdoor Amenity areas are generally suitable for their intended uses, with the Study noting that the proposed landscaping is expected to further improve local wind conditions.

The Study identifies a range of potential mitigation measures for areas experiencing higher wind speeds, including porous wind screens or fencing along the western perimeter, recessed entrances, densely spaced evergreen plantings and localized windscreens near building entrances. For outdoor amenity terraces, increased railing heights, localized windscreens, coniferous plantings and other amenity features may be incorporated where required.

Importantly, the proposed landscape plan already incorporates several measures intended to address wind conditions, including a wood barrier fence along the western property boundary, extensive landscaping around building corners and near Location 39, evergreen trees and shrubs, and additional planting and fencing within the common outdoor and amenity areas. The Study considers these measures positive steps toward mitigating adverse wind conditions, with their effectiveness to be confirmed through future wind tunnel testing.

Overall, the revised Pedestrian Level Wind Study confirms that the proposed development can achieve appropriate pedestrian wind safety and comfort conditions for its intended uses, subject to targeted mitigation at identified locations. The majority of the Site and surrounding pedestrian environment will remain suitable for their intended functions, while localized conditions can be addressed through the proposed landscaping, wind barriers and other site-specific mitigation measures, with the effectiveness of these measures to be verified through future wind tunnel testing.

e) Geotechnical Investigation

A Geotechnical Investigation was prepared by Chung & Vander Doelen Engineering Ltd., dated February 5, 2025, as part of the original application submission. The investigation was undertaken to characterize the subsurface soil and groundwater conditions and to provide foundation design recommendations. It included borehole drilling, laboratory testing, in-situ pressure meter testing, and groundwater monitoring to inform key design and construction parameters.

The investigation revealed surficial asphalt and fill overlying interlayered fine granular deposits, underlain by stiff to hard clayey silt till and very dense sand and silt till. Groundwater was encountered at shallow depths (approximately 1 to 2 metres), indicating the need for careful groundwater management during excavation. The investigation recommends the use of raft foundations for the towers, with preliminary settlement estimates ranging from 20 to 60 mm depending on tower height and basement depth. Groundwater conditions necessitate waterproofing of basement walls and slabs, structural reinforcement to resist hydrostatic pressure, and potentially anchoring the foundation with helical piles or micropiles.

Construction challenges such as deep excavations (up to 10 metres), groundwater control, and shoring to protect adjacent structures are addressed through detailed guidance on dewatering systems, shoring types, and earth pressure calculations. Additional recommendations include robust floor slab and pavement design, waterproofing measures, and compliance with Ontario Regulation 406/19 for managing excess soil. With these geotechnical strategies in place, the proposed development is considered feasible from a subsurface engineering perspective.

f) Transportation Noise and Vibration Assessment (Revised – August 2026)

A Transportation Noise and Vibration Assessment was originally prepared by Dillon Consulting Limited in April 2025 and was subsequently revised in August 2026. The August 2026 revised Assessment updates the previous work to address peer review comments provided by RWDI, dated May 7, 2026, and to reflect the updated Site Plan. The Assessment was prepared in accordance with the requirements of the Region of Waterloo, City of Waterloo Terms of Reference for Noise and Vibration Studies, and the Ontario Ministry of the Environment, Conservation and Parks (MECP).

The Assessment evaluates transportation noise and vibration impacts on the proposed development associated with freight rail and ION LRT operations along the adjacent Waterloo Central Railway Guelph Spur Line, as well as road traffic along Columbia Street West and Phillip Street. The analysis considers the revised five-tower development, consisting of towers ranging from 25 to 35 storeys.

Key findings and recommendations of the revised Assessment are as follows:

Transportation Noise

- Predicted transportation noise levels from the combined road and rail sources exceed applicable criteria at certain building façades and Outdoor Living Areas (OLAs), requiring site-specific noise mitigation measures.
- Brick veneer or an acoustical equivalent façade construction is required for the west façades of Phases 3 and 4 and the north and west façades of Phase 5.
- Upgraded glazing is required for the north, south and west façades of Phases 3, 4 and 5. The specific glazing requirements are to be reviewed as the building design progresses, ideally at the Site Plan Approval stage.

- The west façades of Phases 3, 4 and 5 require air conditioning and a Type D warning clause. Other identified façades throughout the development require provision for central air conditioning and a Type C warning clause.
- A warning clause addressing potential noise and vibration impacts associated with proximity to the Waterloo Central Railway Guelph Spur Line is also recommended for the development, with applicable warning clauses to be registered on title and incorporated into Offers of Purchase and Sale, lease/rental agreements, and condominium declarations.

Outdoor Living Areas

- The majority of assessed rooftop and terrace amenity areas are predicted to achieve acceptable transportation noise levels without physical mitigation. However, certain OLAs require additional measures or warning clauses.
- The south terrace of the Phase 3 podium requires a 1.5-metre-high acoustic barrier to reduce predicted noise levels to an acceptable level.
- Type A warning clauses are recommended for identified outdoor amenity areas where predicted transportation noise levels remain above 55 dBA. The Assessment's conclusions identify the Phase 1 south terrace, Phase 2 west terrace, Phase 3 east terrace, Phase 4 south terrace and Phase 5 north terrace for Type A warning clauses.
- As the site design advances, the height and location of recommended acoustic barriers are to be reviewed by an Acoustical Consultant and the analysis updated where necessary.

Rail Vibration

- The Assessment notes that the Waterloo Central Railway operates the adjacent rail line as a spur line, such that a rail vibration assessment is not otherwise required. Nonetheless, ground vibration measurements were undertaken for both LRT and freight train passbys.
- Measured vibration associated with LRT operations was well below the applicable criterion of 0.14 mm/s. However, vibration measured from the freight train passby exceeded the applicable criterion.
- Accordingly, vibration mitigation will be required to address freight rail activity. Potential measures include trenching and/or building isolation, with the detailed design of the appropriate mitigation measures to be developed through the Site Plan Approval stage.

The Assessment concludes that transportation noise impacts associated with the proposed development can be sufficiently controlled through the recommended façade construction, upgraded glazing, mechanical ventilation, warning clauses and localized acoustic barriers. Similarly, although freight rail vibration exceeds the applicable criterion, appropriate mitigation measures are available and can be designed and implemented through the detailed Site Plan Approval process.

Overall, the revised Transportation Noise and Vibration Assessment demonstrates that the proposed development can appropriately accommodate the transportation noise and vibration environment associated with Columbia Street West, Phillip Street, the ION LRT and the Waterloo Central Railway Guelph Spur Line, subject to implementation of the identified mitigation measures. The Assessment also recommends that the proposed measures be verified as the detailed building design advances and that a construction noise and vibration assessment be completed prior to construction once construction methods and equipment are known.

g) Land Use Compatibility Assessment (Revised – August 2026)

A Land Use Compatibility Assessment was originally prepared by Dillon Consulting Limited in April 2025 and subsequently revised in August 2026. The August 2026 revised Assessment updates the previous work to address peer review comments provided by RWDI, dated March 9, 2026, and May 7, 2026, and to reflect the updated Site Plan. The Assessment was completed in support of the Official Plan Amendment and Zoning By-law Amendment applications and was prepared in accordance with applicable Region of Waterloo, City of Waterloo and MECP requirements.

The Assessment evaluates compatibility between the proposed sensitive residential uses and surrounding industrial, commercial and institutional uses with respect to stationary noise, air quality, odour and dust. Surrounding facilities were reviewed under the MECP D-Series framework. Existing Class I and Class II industries were identified within the applicable Potential Influence Areas and/or Recommended Minimum Separation Distances, including Napa AutoPro, Columbia Data Vault/Ford R&D Centre, Prica Orchard Inc., the University of Waterloo East Campus, Valley Blades Limited, and the University of Waterloo Central Services Building. No Class III industries were identified as requiring assessment.

Stationary Noise Assessment

The revised Assessment includes detailed cumulative stationary noise modelling of surrounding facilities. Sources considered include rooftop and ground-level HVAC equipment, air handling units, process exhausts, emergency generators, cooling towers, truck movements and equipment associated with nearby industrial and institutional facilities. The University of Waterloo Central Services Building cooling towers and exhaust stack were also expressly included in the revised analysis.

The modelling indicates that cumulative stationary noise impacts exceed the applicable MECP Class 1 exclusionary sound level limits at portions of the proposed development. Dillon concludes that achieving Class 1 limits through passive measures, such as increased setbacks or buffering or noise barriers in all directions, is not practicable given the Site constraints and proposed development form. Accordingly, the Assessment recommends that the City designate the development as a Class 4 Area under NPC-300. Dillon notes that the proposal satisfies three of the four requirements for a Class 4 designation, with the remaining requirement being the formal designation by the planning authority.

To address stationary noise impacts, a Type F warning clause and supplied ventilation/air-conditioning system are recommended for the proposed residential buildings. A Type E warning clause is also recommended for sensitive uses within 300 metres of nearby industries to advise future occupants that industrial operations may at times be audible. Applicable warning clauses are to be incorporated into agreements registered on title, including Offers of Purchase and Sale, lease/rental agreements and condominium declarations.

Air Quality, Odour and Dust

The revised Assessment includes air dispersion modelling for surrounding facilities where elevated residential receptors could potentially introduce new air quality considerations. Particular attention was given to Valley Blades Limited and the University of Waterloo Central Services Building. The University facility includes an approximately 45-metre-high exhaust stack and cooling towers, and Dillon completed dispersion modelling to evaluate potential nitrogen oxide impacts at the proposed development.

The modelling concludes that the maximum predicted nitrogen oxide concentration associated with the University Central Services Building is below applicable MECP standards. Dillon therefore concludes that the development is not expected to constrain the University's ability to comply with applicable MECP air quality requirements.

For Valley Blades, dispersion modelling was undertaken for contaminants associated with paint booth operations, particulate matter and natural gas-fired equipment. The Assessment concludes that the proposed development is not expected to limit surrounding industries' ability to operate in accordance with their Environmental Permissions and that significant dust impacts are not anticipated.

The Assessment does identify the potential for low-level odour impacts from Valley Blades' paint booth operations under a conservative worst-case operating scenario. Dillon characterizes the predicted odour as detectable but relatively weak. To reduce the potential for complaints, recommended mitigation includes centralized HVAC capable of positively pressurizing the buildings, air conditioning to allow windows to remain closed, locating fresh-air intakes away from Valley Blades or behind intervening structures, and an appropriate odour warning clause.

Overall, the revised Assessment concluded that, with the recommended Class 4 designation, warning clauses, mechanical ventilation and air-conditioning, and air quality/odour mitigation measures, the proposed development is expected to be compatible with surrounding industrial, commercial and institutional uses. The Assessment further concludes that the development is not expected to adversely constrain the continued operation of surrounding industries or their ability to comply with applicable Environmental Permissions, and that the requirements of the MECP D-Series Guidelines can be appropriately addressed through the recommended mitigation measures.

h) Development Viability Assessment (Rail Safety Report)

A Development Viability Assessment, also referred to as a Rail Safety and Risk Mitigation Study, was prepared by Dillon Consulting Limited and dated July 21, 2026. The Study was prepared in response to the proximity of the proposed development to the adjacent Waterloo Central Railway corridor and assesses the development in accordance with the Federation of Canadian Municipalities and Railway Association of Canada Guidelines for New Development in Proximity to Railway Operations (FCM-RAC Guidelines).

The Study acknowledges that the proposed five-tower mixed-use development does not fully incorporate all of the standard mitigation measures identified in the FCM-RAC Guidelines. In particular, the Guidelines recommend a 15-metre building setback from a Spur Line, whereas portions of Phases 3, 4 and 5 are located within this setback. The first approximately 9 metres adjacent to the railway are generally occupied by open areas including the proposed service road, loading area and access to the parking ramp, while portions of the podium, office/retail space and residential building above are located between approximately 9 and 15 metres from the railway property line. The Study also identifies the absence of security fencing as a deviation from the standard FCM-RAC measures.

The adjacent freight railway is classified as a Spur Line under the FCM-RAC Guidelines. The Study identifies approximately two (2) freight trains per day, generally operating during the nighttime period, at approximately 10 mph. No rail yard is located within 2 kilometres of the Site, and a review of Transportation Safety Board records from 2004 to 2024 identified one derailment elsewhere along the Spur, with no identified accidents between Mileposts 3 and 4 adjacent to the Subject Lands.

The Study applies a risk assessment methodology consistent with ISO 31000 and the DVA methodology established by the FCM-RAC Guidelines. Seven (7) potential risk scenarios were identified relating to Site conditions, railway operations and construction activities. Of these, two (2) scenarios warranted detailed quantitative risk assessment: train derailment resulting in a public fatality and a dangerous goods release requiring public evacuation.

Train Derailment Risk

The assessment considers the possibility of a freight train derailment affecting lands within the Rail Proximity Envelope associated with the railway. The analysis considers both existing and forecast future rail traffic through the anticipated life of the development. Dillon concludes that the risk associated with a derailment does not exceed the applicable risk criteria, including for the service road, loading area, parking ramp, open spaces, podium, office/retail uses and residential occupancy.

Importantly, the Study concludes that, notwithstanding the reduced setback from the 15 metres recommended by the FCM-RAC Guidelines, the low speed and frequency of freight operations on the Spur result in an acceptable level of risk. Residential occupancy is situated above the Rail

Proximity Envelope and is setback approximately 9 metres from the railway. Dillon further concludes that the physical footprint of a derailment is highly unlikely to extend beyond the Rail Proximity Envelope and that additional physical mitigation, such as a crash wall or berm, is not warranted.

Dangerous Goods Risk

The Study also evaluates the potential for a dangerous goods release resulting from a rail accident, including a conservative assessment of an anhydrous ammonia release. Dillon concludes that there is no exceedance of the applicable risk criteria during either the construction or occupancy periods, including for residential uses. As a result, a site-specific evacuation plan associated specifically with rail-related dangerous goods incidents is not considered necessary.

Construction and Operational Mitigation

The Study identifies several additional measures to manage potential risks associated with construction and ongoing Site operation. These include implementation of erosion and sediment controls and appropriate coordination with Waterloo Central Railway where required; consultation with the railway should potentially contaminated soil be encountered near the shared property line; and confirmation of whether an Air Rights or Crane Swing Agreement is required where construction cranes may swing over the railway right-of-way. Construction screening and an agreed communication protocol with Waterloo Central Railway are also recommended where construction occurs immediately adjacent to the corridor.

To address the potential for trespassing following occupancy, Dillon recommends installation of a 1.83-metre-high tamper-proof fence along the mutual railway property line, together with "No Trespassing" signage and proactive rail safety awareness measures. Monitoring of occupant behaviour is also recommended to determine whether additional measures are necessary following development.

Overall, the Study concludes that the proposed development is considered safe from a rail proximity and risk perspective, notwithstanding the site-specific deviation from the standard 15-metre FCM-RAC building setback. Based on the characteristics of the Spur Line, current and forecast rail traffic, the proposed arrangement of uses adjacent to the corridor and the quantitative risk assessment, Dillon concludes that there are no safety concerns associated with the proposed setback that would warrant a crash wall, berm or other additional physical derailment protection. The remaining construction and operational risks can be appropriately managed through the recommended design, fencing, construction and coordination measures.

i) Shadow Study Analysis

A Shadow Study Analysis was prepared by Up Consulting Ltd., in conjunction with the Shadow Diagrams prepared by AAA Architects Inc. as part of the original application submission. The purpose of the analysis was to assess the shadowing impacts of the proposed development on adjacent lands and uses. Based on the study, it was determined that the proposed development

will meet the requirements outlined in the City of Waterloo's Sun/Shadow Analysis Terms of Reference.

j) Energy Strategy

An Energy Strategy Report was prepared by S+A Footprint on April 29, 2025, as part of the original application submission. The purpose of the study was to identify feasible strategies to reduce energy consumption, GHG emissions, and embodied carbon while improving building resilience and supporting a path toward net-zero emissions. The study evaluated the building's energy performance under three scenarios: the Ontario Building Code baseline, a High-Performance design, and a Net-Zero Ready design.

The findings show that the baseline design, using conventional boiler/chiller systems, would meet minimum code but not achieve substantial reductions in energy or emissions. The High-Performance scenario, incorporating an air-source heat pump system, improved insulation (R-8 walls, R-30 roofs), double-glazed windows, energy recovery ventilators, low-flow fixtures, and LED lighting, demonstrated a 52% reduction in total energy use intensity (TEUI), 34% in thermal demand (TEDI), and 72% in GHG emissions intensity (GHGI) compared to the baseline. To achieve Net-Zero Ready performance, further enhancements such as triple-glazed windows, geothermal heating, ultra-low-flow fixtures, increased ERV efficiency, and additional air-tightness measures are necessary, resulting in up to 68% TEUI, 60% TEDI, and 92% GHGI reductions.

The report recommends focusing on high-impact Energy Conservation Measures (ECMs), such as optimized glazing, thermally broken balconies, efficient mechanical systems, and smart metering. While reaching full Net-Zero would require substantial investment and design innovation, the report concludes that the High-Performance scenario is technically and financially viable and aligns well with municipal goals. Future site plan approvals should refine and confirm these strategies through detailed modelling and plans.

9. PUBLIC CONSULTATION STRATEGY

This section of the Report provides an overview of the proposed public consultation strategy with regard to the proposed development. The *Planning Act* (O. Reg. 544/06, as amended by O. Reg. 178/16) provides that applicants are required to include a proposed public consultation strategy as part of a 'complete' application submission.

The applicant proposes that the public consultation process for the Official Plan and Zoning By-law Amendment application adheres to the statutory requirements outlined in the *Planning Act*. Additionally, an informal public meeting may be held early in the process, ahead of the statutory public meeting where appropriate.

The proposed public consultation process is as follows:

- A Statutory Public Meeting: Advertised by the City and held by Council (occurred on July 14, 2025).
- Direct Written Responses to Public Comments: Direct written responses to feedback received during the consultation process will be provided to City Staff for review and incorporation into the City Staff Report.
- Preparation of the City Staff Report: The report, along with any supporting technical studies and reports, will be made available to the public prior to City Council's review of the application. It is expected that City Staff will post this information, including the City Staff Report, on the City's website for public access.
- Council Meeting: Council will review the City Staff Report, supporting documentation, and public input before making a final decision on the application.

The proposed consultation strategy aims to provide members of the public with the opportunity to review, understand, and provide feedback on the Official Plan and Zoning By-law Amendment applications. The consultation strategy will be coordinated with City Staff, and additional opportunities for consultation will be considered and may be warranted based on the input received.

10. CONCLUSION AND RECOMMENDATIONS

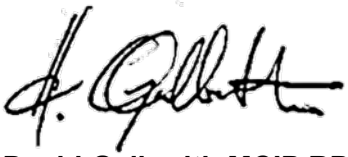
This Report provides an assessment of the revised development proposal and development applications for the properties known municipally as 170 & 180 Columbia Street West, which includes a discussion on the existing conditions of the Site, the history of applications and correspondence, its context, the land use planning policy framework applicable to it, and land use planning rationale for the development proposed.

Based on our assessment of the applications, it is our opinion that the revised Official Plan Amendment and Zoning By-law Amendment are justified, as they have regard to the "Matters of Provincial Interest" set out in the *Planning Act*, are consistent with the PPS, and conform to the Region of Waterloo Official Plan.

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

Based on the above and the conclusions of this Report, it is our recommendation that the City of Waterloo continue to process the development applications and re-circulate the updated materials to internal departments, technical review agencies, and the community in accordance with City procedures and the *Planning Act*.

Respectfully submitted,



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