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City of Waterloo
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August 27th, 2026

Attention: Amanda Wyszynski, Senior Development Planner & Site Plan Committee Chair

Re: Post Circulation Comments – Submission #2
Project: 170 and 180 Columbia Street West, Mixed Use Residential Development
Official Plan Amendment No. 67, Zoning By-law Amendment Z-25-14, Official Plan Amendment No. 68, and Zoning By-law Amendment Z-25-15
170 Columbia Waterloo Incorporated and 180 Columbia Waterloo Incorporated

Subject: Response to Zoning Comments, April 20, 2026

Thank you for your valuable feedback on our application for the site 170 and 180 Columbia Street West, Waterloo, Ontario. Below are proposed modifications made in response to your comments. Your commitment to a thorough review is appreciated.

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th></tr>
<tr><td colspan="2">PART B - ZONING BY-LAW AMENDMENT</td><td></td></tr>
<tr><td colspan="2">Zoning</td><td></td></tr>
<tr><td></td><td>
<table>
<tr><th>Regulation</th><th>Requirement</th><th>Proposed</th></tr>
<tr><td>Street line setback (maximum)</td><td>75% of the streetline building façade shall be within 6m of the streetline</td><td>170 Columbia - 31.6m
180 Columbia – 6m</td></tr>
<tr><td>Non-Residential Uses (minimum)</td><td>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 sq.m per</td><td>170 Columbia – 568 sq.m
180 Columbia – 680 sq.m
0.5 sq.m per unit</td></tr>
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</td><td>Mezzanine has been removed.

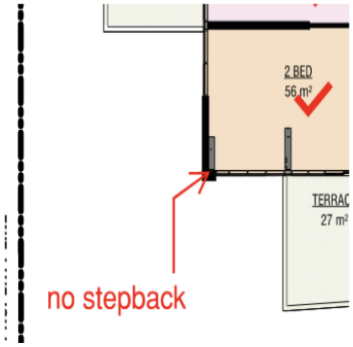
Podium levels are proposed as follows:
Phases 1 & 2: 22.4 m & 6 storeys
Phase 3: 22.4 m & 6 storeys
Phase 4: 13.48 m & 4 storeys
Phase 5: 22.4 m & 6 storeys
Refer to the zoning matrix for the requested zoning reliefs.

Non-Residential Uses:</td></tr>
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		dwelling unit and 1 sq.m per dwelling unit in all other instances.		**170 Columbia** = 505 m²; **180 Columbia** = 2,462 m²; **total** = 2,967 m². The comment has been acknowledged, and the proposed non-residential building area has been revised, with the overall non-residential area increased to better reflect current market conditions. Please refer to Appendix #2 for the supporting rationale and calculations.
	Number of building on a lot (maximum)	More than 1 main building permitted	170 Columbia – 2 180 Columbia – 3	
	Height of first storey (minimum)	4m	TBD – mezzanine not compliant*	
	Building Height (minimum)	10.5m and 3 storeys	Building 1 – 112.1m & 35 storeys Building 2 – 97.3m & 30 storeys* Building 3 – 112.1m & 35 storeys Building 4 – 81.9m & 25 storeys Building 5 – 97.3m & 30 storeys*	
	Building Height (maximum)	105m and 30 storeys		
	Podium height (maximum)	27m and 6 storeys	170 Columbia – 22.4m & 7 storeys 180 Columbia – 22.4m & 7 storeys	
	Tower Separation (minimum)	22m from a Tower on the same lot 11m from an interior lot line, except where the interior lot line abuts lands zoned OS1 (see 3.T.5.1 and 3.T.5.2)	Building 1 – (e & w) 9m Building 2 – (w) 9m Building 3 – (e) 4.5m Building 4 – (e) 6.6m Building 5 – (e) 6.6m	
	Tower Stepback above podium, including	3m	170 Columbia – 0m 180 Columbia – 0m	

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balconies, on the front building façade and flankage building façade (minimum)		
Common outdoor area dimensions (minimum, each dimension)	Not less than 6m, except where the common outdoor area is located in the front yard or flankage yard where 1 dimension shall not be less than 4m	170 Columbia – 25m 180 Columbia – 4m
Amenity Areas (minimum)	3 sq.m for the first bedroom and 2 sq.m for each additional bedroom in the dwelling unit 13,099 sq.m required	19,491.76 sq.m* amenity space calculation includes rooftop amenity space that is not compliant with 3.A.4.4
3.A.4.4 – Amenity Area	Notwithstanding anything to the contrary, a maximum 20% of the required amenity area may be outdoor rooftop amenity space located more than 22m above grade	170 Columbia - 25.9% (855.8 sq.m) 180 Columbia – 32% (1,502.69 sq.m)
3.F.2.1	No lot shall be used in whole or in part, nor	Depending on future lot division relief could be required.

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	shall any building or structure be erected thereon or used for any purpose in any zone unless the lot abuts a street. For the purpose of this regulation, a street excludes a lane.*	
3.M2B	Mezzanine provisions	It appears the mezzanine is not compliant and will be viewed as a storey if it continues to be proposed.
6.1.4*	Parking spaces shall have direct access to: a) Street or lane, or A driveway or drive aisle that has direct access to a street or lane	Depending on future lot division relief could be required.
6.2.1	Underground parking shall comply with the front yard building line setback and flankage yard building line setback in the zoning category applied to the lot.	Building 3 Depending on future lot division relief could be required.
6.8.1*	The entire driveway shall be located on the same lot as the related parking spaces.	Depending on future lot division relief could be required.

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	6.8.2*	The driveway shall lead directly to the parking spaces.	Depending on future lot division relief could be required.
	6.9.5.1*	Loading spaces shall have direct access to a driveway, street or lane with: a) a minimum width of 3.5m; and a minimum vertical clearance equal to the minimum vertical clearance required in Table 6H for the entire length of the driveway.	Depending on future lot division relief could be required.
	*potential relief required. Demonstrate compliance in future submissions.		
	Staff do not oppose the following zoning relief: • Side yard setback – to recognize pinch points • Maximum street line setback – to facilitate the current greenspace, however Staff recognize additional discussions are to be had with Parks to determine the appropriate spot. • Tower separation to an interior lot line		Acknowledged.
	Staff require additional information for the following zoning relief: a. Height of first storey – recognizing the mezzanine is not in compliance b. Tower step back – additional information required speaking to how the intent of the provision is being satisfied c. Amenity area above 22m – future applications to demonstrate there is no negative impact to users (i.e. wind and noise) and that other landscape/ greenspace requirements are being satisfied d. Minimum Street line Setback & Underground parking setback – future submissions to demonstrate there is		a. The mezzanine level has been removed. The proposed first-storey height is 7.0 m for all phases and complies with the minimum 4.0 m requirement. b. The required minimum 3.0 m tower stepback, including balconies, is provided above the podium along the applicable front building façades. Stepback dimensions are also shown along the façades adjacent to the future R.O.W. Refer to drawing a100b for dimensions.

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	no negative impact to existing/ future infrastructure and the public realm	At select building corners, limited vertical architectural elements continue from the podium to the tower. These elements provide façade articulation and do not form part of the principal tower mass. The principal tower mass, including balconies, maintains a minimum 3.0 m stepback, providing a clear podium-to-tower transition consistent with the intent of the tower stepback requirement. c. Excess rooftop common outdoor amenity above the building-specific 20% cap is not credited toward the required amenity area. Refer to Appendix # 3. d. Zoning relief will be required for the proposed minimum street-line setback at 180 Columbia and for the underground parking setbacks at both properties. The underground design has been carefully developed with consideration for existing services, easements, and public infrastructure. At 170 Columbia street west, on the underground, the existing easements are maintained, and the building has been set farther from the property line to allow the existing hydro and other public infrastructure to remain undisturbed. At 180 Columbia street west, the underground structure has been designed to provide a clearance greater than 1.0 metre to accommodate future shoring and foundation construction, including potential caissons. Detailed shoring and foundation design will be further developed at subsequent design stages.
	Staff currently do not support the following request for relief and require additional justification as to how the Official Plan is being satisfied: **a.** Non-Residential Gross Floor Area	a. The comment has been acknowledged, and the proposed non-residential building area has been revised, with the overall non-residential area increased to better reflect current market conditions. Please refer to Appendix #2 for the supporting rationale and calculations.
Loading		

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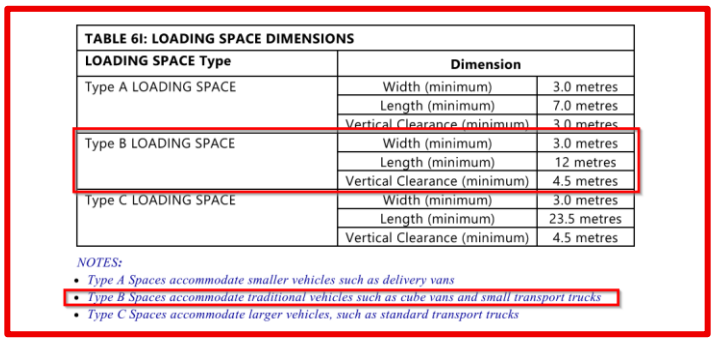
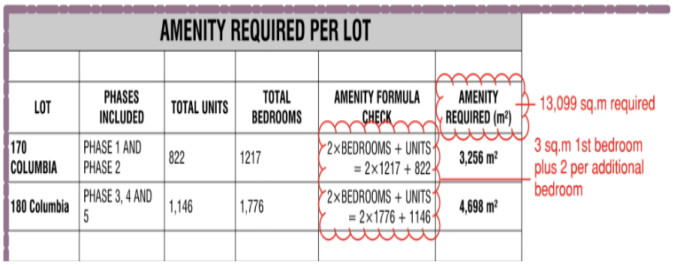
	Staff continue to question the loading and pedestrian interface for Building 1. It appears a type B space is proposed, whereas a Type A is required. Are the loading operations intended to occur internally or externally? Staff seek this clarification as there may be conflict in pedestrian movement trying to access either the pet relief area or the outdoor amenity area. 	Type B loading space exceeds the requirements of type A space and is proposed to support commercial uses. The operations will take place inside the building. Loading areas were replanned with no amenities adjacent.
Mezzanine		
	It appears the modified mezzanines identified on drawing A104 in the Architectural package do not meet the definition of mezzanine in Zoning By-Law 2018-050, or the regulations in provision 3.M.2B. Based on this, the mezzanine will be considered a storey as identified in the Planning Justification Report. However, it appears this additional storey in the podium was not captured in the requested overall building height, and buildings 1 and 3 are 36 storeys in height. Future submissions to demonstrate compliance or revise requested amendments with sufficient planning justification.	Mezzanine has been removed. Accordingly, Buildings 1 and 3 remain proposed at 35 storeys, as reflected in the revised zoning matrix and drawings.
PART C - OTHER CONSIDERATIONS		
Site Plan & Miscellaneous Comments		
	Staff have provided preliminary high level site plan comments for implementation as it may impact proposed zoning relief. 1) Ensure pedestrian doors are inset to create a step out into the drive aisle/ visibility for cars. 2) Ensure accessible aisles are dedicated to the accessible space and not being used for multiple purposes (i.e. access to bike room). 3) Common outdoor area to be further reviewed 4) Landscape open space to be further reviewed 5) Amenity space to be further reviewed 6) Bike parking to be further reviewed 7) Vehicular parking (EV, location, movement, etc...) to be further reviewed 8) Loading (location, movement, etc...) to be further reviewed	1) Underground levels reviewed and pedestrian doors have been inset to provide more pedestrian security. 2) Accessible aisles have blue color designations and pedestrian accesses have white and diagonal hatch designation to better distinguish them. Pedestrian access works independently of accessible aisles. 3) – 8) Acknowledged 9) Acknowledged and revised

TABLE 6I: LOADING SPACE DIMENSIONS

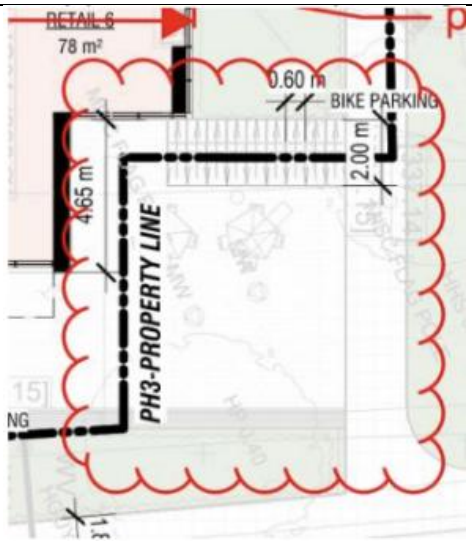
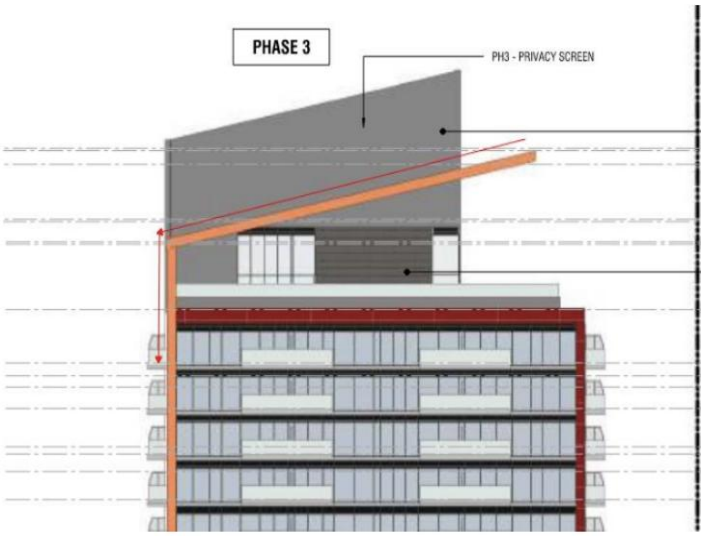
LOADING SPACE Type	Dimension	
Type A LOADING SPACE	Width (minimum)	3.0 metres
	Length (minimum)	7.0 metres
	Vertical Clearance (minimum)	3.0 metres
Type B LOADING SPACE	Width (minimum)	3.0 metres
	Length (minimum)	12 metres
	Vertical Clearance (minimum)	4.5 metres
Type C LOADING SPACE	Width (minimum)	3.0 metres
	Length (minimum)	23.5 metres
	Vertical Clearance (minimum)	4.5 metres

NOTES:
- *Type A Spaces accommodate smaller vehicles such as delivery vans*
- *Type B Spaces accommodate traditional vehicles such as cube vans and small transport trucks*
- *Type C Spaces accommodate larger vehicles, such as standard transport trucks*

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	9) Landscape number in stats chart on pg. A100 does not align with LOS figure on pg. A100b	
	Update amenity calculation. Zoning requires 3 sq.m for the first bedroom and 2 sq.m for each additional bedroom.  **AMENITY REQUIRED PER LOT** LOT | PHASES INCLUDED | TOTAL UNITS | TOTAL BEDROOMS | AMENITY FORMULA CHECK | AMENITY REQUIRED (m²) 170 COLUMBIA | PHASE 1 AND PHASE 2 | 822 | 1217 | 2×BEDROOMS + UNITS = 2×1217 + 822 | 3,256 m² 180 Columbia | PHASE 3, 4 AND 5 | 1,146 | 1,776 | 2×BEDROOMS + UNITS = 2×1776 + 1146 | 4,698 m² 13,099 sq.m required 3 sq.m 1st bedroom plus 2 per additional bedroom	Refer to Appendix # 1. The amenity area requirement has been calculated based on 3 m^2 for the first bedroom of each dwelling unit and 2 m^2 for each additional bedroom. Accordingly, the calculation is: (3 m^2 x total units) + [2 m^2 x (total bedrooms − total units)] This is mathematically equivalent to: (2 m^2 x total bedrooms) + (1 m^2 x total units) For 170 Columbia Street: (3 x 818 units) + [2 x (1,209 bedrooms − 818 units)] = 2,454 m^2 + 782 m^2 = 3,236 m^2 For 180 Columbia Street: (3 x 1,089 units) + [2 x (1,680 bedrooms − 1,089 units)] = 3,267 m^2 + 1,182 m^2 = 4,449 m^2 The total amenity area requirement for all phases is therefore 7,685 m^2.
	It appears the bike parking and patio are encroaching into 176 Columbia St	The surface bicycle parking layout has been reviewed and revised to ensure that all spaces are located entirely within the property lines. Please refer to drawing a103.

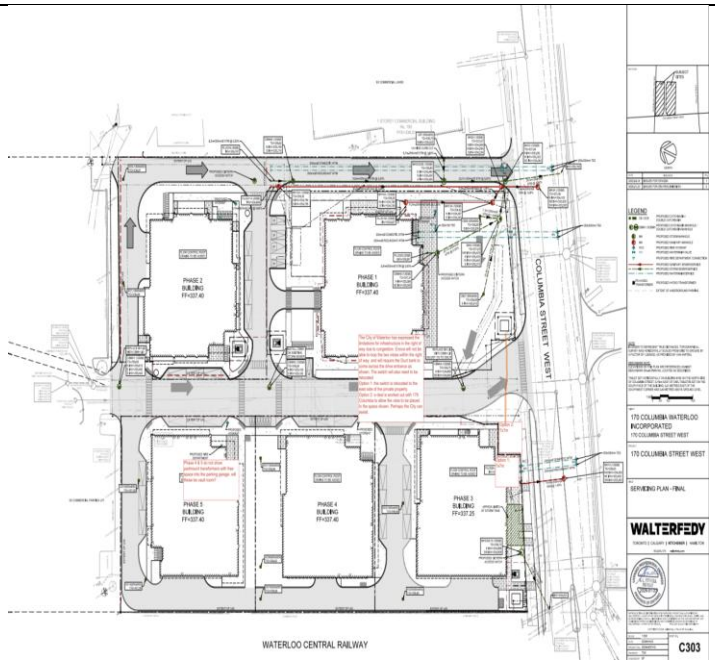
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	Staff request additional clarification as to how snow, rain and ice will be managed regarding the architectural element. It appears to be a continuous roofline which may negatively impact balconies, podium amenity space and the pedestrian realm. 	The roof design has been reviewed and additional details have been provided. The proposed roof structure accommodates drainage through scuppers to the mechanical roof, through slatted areas to drains located at the amenity level, and by means of roof slopes designed to prevent drainage onto balconies or podium areas. Please refer to drawing A901 for the applicable diagrams and details. The roof drainage design and associated construction details will be further developed during subsequent design stages.
Property Lines		
	It appears the property lines for Phase 2 has been modified. Staff require additional clarification. Was it to ensure Phase 2 has frontage along a public street?	Yes. The proposed property lines have been further revised to: A. Accommodate the proposed parkland dedication and future right-of-way conveyance. B. Ensure that phase 2 maintains frontage on Columbia Street West and, following the future right-of-way conveyance, will also have frontage on a public street.

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		C. Ensure that all required equipment and easements, including hydro equipment and associated infrastructure, can be fully accommodated within the site.
PART D - URBAN DESIGN COMMENTS		
	Staff have concerns about falling ice in the winter/spring from the sloped tower tops. Please confirm there will be snow/ice guards installed as part of the roof construction.	**Refer to comment above.**
PART F - LANDSCAPE ARCHITECTURE		
	Based on the zoning designation that is now proposed, staff acknowledge that the minimum Landscaped Open Space (LOS) requirement for each property is 15%. This breakdown should be indicated on the Site Plan and/or Landscape Plan to demonstrate compliance. Refer to the City Zoning Bylaw 2018-050 for LOS definition and exclusions.	In accordance with the city of Waterloo Zoning by-law 2018-050, and the definition of Landscaped Open Space, a minimum of 15% of the lot area is provided as landscaped open space (LOS). A detailed diagram and area breakdown by phase are provided on detail 2/A100b.
PART G - TRANSPORTATION SERVICES COMMENTS		
General Comments		
	Why did the bicycle parking supply decrease from the original submission? Staff recommend providing adequate bicycle parking to meet the needs of the site. There is a total of 1968 units proposed and a combined total of 1659 parking spaces (both vehicle and bicycle parking). This means some units will not have access to either vehicle parking or bicycle parking. What about parking for visitors or employees of the office spaces proposed on-site?	The bicycle parking counts are provided to meet the requirements under Section 6.6.2 for residential and non-residential uses. Please refer to the zoning matrix and A100d for bicycle count tables.
PART N - ENOVA POWER		

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		Acknowledged. The location and design of the proposed electrical vaults and switchgear remain under coordination. Based on latest discussions and coordination: For 170 Columbia Street West, the applicable easements and proposed equipment locations have been identified in detail for reference. For 180 Columbia Street West, a switchgear connection to Columbia Street is proposed to serve phases 3, 4, and 5. Phase 3 is proposed with a pad-mounted transformer, while Phases 4 and 5 are proposed with internal electrical vault rooms. Coordination with Enova regarding these items is ongoing.
	The switch will also need to be relocated. Option #1: The switch is relocated to the east side of the private property. Option #2: A deal is worked out with 178 Columbia to allow the vista to be placed in its vicinity. Perhaps the city can assist.	Further coordination with Enova is required for 180 Columbia.
	Phases 4 and 5 do not show pad mount transformers with free space into the parking garage, will these be vault rooms?	See below for the proposed and refer to A103. Phases 1,2, 3: Pad mount transformers are proposed. Phases 4,5: Internal electrical vaults are proposed. The duct bank connecting the switch gear on 180 Columbia St W is proposed to run underground and above the parking garage. Enough clearance is provided and coordination will be refined in further stages.

We hope that the above responses and alterations meet with your approval. If you have any questions, please do not hesitate to contact us.

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Yours Sincerely,



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