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Submitted via email to: amanda.wyszynski@waterloo.ca

Re: Official Plan Amendments No. 67 and No. 68
Zoning By-law Amendments Z-25-14 and Z-25-15
170 and 180 Columbia Street West, Waterloo
Resubmission No. 2 Package

On behalf of our client, 170 Columbia Waterloo Incorporated, please accept this letter and the supporting materials as the Resubmission No. 2 of Official Plan Amendments No. 67 and No. 68, and Zoning By-law Amendments Z-25-14 and Z-25-15 for the subject lands known as 170 and 180 Columbia Street West, Waterloo. As the City is aware, two (2) separate applications were submitted to the City for 170 Columbia St W and 180 Columbia St W, but one (1) comprehensive package has been prepared:

- One (1) copy of the Post-Circulation Comments provided by the City of Waterloo;
- One (1) copy of the *revised* Planning Justification Report prepared by Up Consulting Ltd.;
- One (1) copy of the *revised* Architectural Package prepared by AAA Architects Inc.;
- One (1) copy of the Appendix #1 (Required Amenity Calculations) prepared by AAA Architects Inc.;
- One (1) copy of the Appendix #2 (Non-Residential Uses) prepared by AAA Architects Inc.;
- One (1) copy of the Appendix #3 (Amenity Areas) prepared by AAA Architects Inc.;
- One (1) copy of the *revised* Functional Servicing & Stormwater Management Report prepared by WalterFedy;
- One (1) copy of the *revised* Civil Engineering Plans prepared by WalterFedy;
- One (1) copy of the *revised* Arborist Report and Tree Survey Plan prepared by NAK DS Inc.;
- One (1) copy of the *revised* Landscape Plan & Vegetation Management Plan prepared by NAK DS Inc.;

- One (1) copy of the *revised* Transportation Impact Study (Letter / Addendum) prepared by GHD;
- One (1) copy of the Development Viability Assessment (Rail Safety Report) prepared by Dillon Consulting Limited;
- One (1) copy of the *revised* Land Use Compatibility Assessment prepared by Dillon Consulting Limited;
- One (1) copy of the *revised* Transportation Noise and Vibration Assessment prepared by Dillon Consulting Limited; and
- One (1) copy of the *revised* Pedestrian Level Wind Study prepared by BLWT.

City Staff provided the final Post-Circulation Comments package on April 20, 2026, outlining initial comments, as well as details to be addressed in order to advance both applications. Following receipt of the comment package, several meetings and ongoing correspondence with City Staff were undertaken to obtain further clarification and direction on the items identified. A Comment Matrix, found in **Appendix A** of this Letter, has been prepared to address the comments from the latest Post-Circulation Comments.

1) Summary of Resubmission No. 2 of the Development Proposal

As described in the revised Planning Justification Report prepared by Up Consulting Ltd., the applicant is proposing a comprehensive, multi-phase mixed-use development that will be implemented over five (5) phases and two (2) properties at 170 and 180 Columbia Street West. 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, reduced from the 37- to 41-storey towers contemplated through the original submission. The development will provide a mix of residential, retail and office uses, together with a range of indoor and outdoor amenity spaces. 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.

The current proposal increases the amount of non-residential floor area provided throughout the development. The approximately 2,967 m² of non-residential floor area comprises approximately 740 m² of retail space, 1,963 m² of office space and 264 m² of flexible retail/office space, representing an increase from the approximately 1,248 m² contemplated through Resubmission No. 1. Retail uses are generally located to contribute to public realm activation, while the significant office component provides opportunities to maintain and expand employment functions within the subject lands.

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 to a privately owned Common Outdoor Area. Following further discussions with City staff, Resubmission No. 2 now provides for a 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 the dedicated park block. 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. The revised master plan also relocates the Common Outdoor Area on the 180 Columbia Street West lands to between Phases 3 and 4, resulting in a more deliberate distribution of public and common open spaces throughout the development.

The revised development proposal provides a total of 409 vehicular parking spaces across the development, comprising 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 on the lands to the rear of the Phase 1 building until construction of Phase 2 commences. The specific configuration, number of spaces and associated design of the temporary parking area will be determined through the future Site Plan Application for Phase 1. The permanent parking supply also includes 45 visitor parking spaces intended to be shared with the non-residential uses.

A total of 1,234 bicycle parking spaces is proposed across the five (5) phases, comprising 1,212 residential bicycle parking spaces and 22 Type A bicycle parking spaces for the non-residential uses. Bicycle parking is distributed throughout the development.

For a detailed description of the proposed development, please refer to the revised Planning Justification Report prepared by Up Consulting Ltd.

2) Amended Development Applications

The Official Plan Amendment has been refined to address only those site-specific policy permissions that remain necessary to facilitate the current development proposal. The revised OPA seeks site-specific provisions related to the proposed building heights and densities, together with a site-specific methodology for determining the required non-residential floor area. Rather than establishing the non-residential requirement solely on the basis of dwelling unit count, the proposed methodology establishes a proportional requirement based on the scale of the residential development, as detailed in the revised Planning Justification Report. The corresponding Zoning By-law Amendment implements this methodology using the Zoning By-law's Habitable Floor Space terminology.

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 site-specific provisions 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. This is also consistent with how the revised ZBA is characterized in the Planning Justification Report.

The revised site-specific policy and zoning framework recognizes that the proposal represents a coordinated, master-planned development across 170 and 180 Columbia Street West that will be

implemented incrementally over five (5) phases. The two (2) properties will continue to be treated as separate lots for the purposes of applying the applicable zoning regulations, 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 between the respective development phases are intended solely as phasing lines and will not be treated as lot lines for zoning purposes. Accordingly, applicable zoning regulations will be assessed on the basis of each property as a whole, while setbacks and separations required from a lot line will continue to be measured from the applicable existing property lines. This provides an appropriate and flexible regulatory framework for the phased implementation of the development while maintaining clear controls over building placement, built form and other site-specific matters.

170 Columbia St W (Phases 1 and 2)

Official Plan Amendment

As part of the original OPA application for the subject lands, part of the purpose of the OPA was to redesignate the lands '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 designed 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally proposed OPA are no longer required.

In order to reflect the updated development concept now proposed and to reflects 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.

Zoning By-law Amendment

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 (Phase 3 to 5)

Official Plan Amendment

As mentioned above, part of the purpose of the original OPA submission was to redesignate the lands ‘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 designed 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally proposed OPA are no longer required.

In order to reflect the updated development concept now proposed and to reflects 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.

Zoning By-law Amendment

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%;
- 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;

- 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.

4. Conclusion

We trust that the revised materials satisfy the application requirements for the proposed Official Plan and Zoning By-Law Amendment applications, and we look forward to your confirmation of the same. Accordingly, it is our opinion that the resubmission materials respond to all comments received to date and are appropriate to advance the applications to Council for a decision.

Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

up consulting

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APPENDIX A – Comment Matrix

No.	Comment	Response
PART A - OFFICIAL PLAN REVIEW		
Official Plan Designations		
1.	The City recently updated its Official Plan (approved December 2025), redesignating the subject lands to "Station Area Mixed Use" (SAMU). This designation supports a full range of land uses in proximity to the ION LRT, including mixed-use development, substantial intensification, and enhanced mobility and placemaking opportunities. While the proposed uses generally align with the vision for significant residential intensification in the R&T Station Area, the limited provision of non-residential uses does not achieve the mixed-use intent of the SAMU designation.	Resubmission No. 2 substantially increases the non-residential component of the development in direct response to Staff's comments regarding the mixed-use intent of the Station Area Mixed-Use designation. The proposal now provides approximately 2,967 m² of non-residential Building Floor Area, compared with approximately 1,248 m² through Resubmission No. 1. This comprises approximately 740 m² of retail, 1,963 m² of office, and 264 m² of flexible retail/office space, providing a substantially stronger commercial and employment component across the Subject Lands.
2.	Key policy requirements of the Official Plan include: ● Policy 10.5(9): A mix of employment, commercial, community, and residential uses shall contribute to achieving the minimum Station Area density target of 160 residents and jobs per hectare. ● Policy 10.5(12): Requires a minimum of 2 m^2 of non-residential GFA per dwelling unit, which for 1,968 units equals 3,936 m^2. Only 1,248 m^2 is proposed.	Policy 10.5(9) continues to be addressed through the proposed mix of high-density residential, retail and office uses. With respect to Policy 10.5(12), the applicant has developed an alternative proportional methodology based on the identified market-area average apartment size of 62.7 m². Applied across the entirety of the development, this results in a non-residential requirement of approximately 2,966 m², compared with 2,967 m² proposed. As 170 and 180 Columbia Street West will remain separate parcels for zoning purposes, parcel-specific rates are proposed to reflect the distribution and phasing of non-residential uses: 2 m² per 158.7 m² of Habitable Floor Space at 170 Columbia Street West and 2 m² per 43 m² at 180 Columbia Street West. Phases 1 and 2 will initially provide a smaller proportion of the new non-residential space, with the balance delivered through the subsequent redevelopment of 180 Columbia Street West. Importantly, the existing office

		building at 180 Columbia Street West will remain in operation during the development of Phases 1 and 2, maintaining an employment/non-residential presence during the interim condition.
3.	While the Applicant is including office and retail into the proposed development, it is Staff's opinion there are opportunities for the inclusion of additional non-residential uses. Staff strongly recommend the Applicant review policy 10.5(3)(b)-(n) in the Official Plan and explore which additional uses can be implemented. Recognizing the proximity to ION LRT stations, the intent of the SAMU designation was to allow residential density in addition to non-residential uses.	The applicant reviewed opportunities to increase and diversify the non-residential component of the development. Resubmission No. 2 provides a significant office component in addition to retail and flexible retail/office space. The proposed spaces are intended to accommodate a range of uses permitted by the SAMU designation and zoning, rather than being limited to a single commercial function. This provides flexibility for the spaces to respond to market demand and the evolving needs of residents, employees and the surrounding Station Area.
4.	Staff recognize the Planning Justification Report spoke to nearby amenities, however residents of this new neighborhood should not be reliant on accessing the University campus for their day to day needs.	The revised proposal does not rely solely on existing amenities within the University of Waterloo campus to meet the needs of future residents. The substantial increase in on-site non-residential floor area provides new opportunities for locally serving commercial, retail, office and service functions directly within the development. The proposal also incorporates dedicated municipal parkland, Common Outdoor Areas, indoor and outdoor amenity spaces, active transportation connections and proximity to existing transit and community amenities.
5.	Staff also recognize the Planning Justification Report spoke to other precedent examples, two of which were in the City of Kitchener and the third being Kraus Carpets. While this development has a permitted height of 35 storeys, it is limited to two buildings not in close proximity to each other, and the development is exceeding the minimum 2 sq.m of non-residential floor area based on Staff's understanding.	The precedent examples discussed in the PJR are provided as contextual examples of high-density development and increased height permissions within comparable urban and transit-supportive settings. The appropriateness of the current proposal is principally assessed against the applicable policies of the Waterloo Official Plan and the specific characteristics of the Subject Lands. The revised PJR provides a detailed assessment of the increased height

		against Policies 3.4(6) through 3.4(11).
6.	Key Concerns: ● The proposal provides far less non-residential space than required and than currently exists. ● Additional non-residential uses (e.g. personal services, community uses, light employment, food store) could be incorporated. ● Community Planning staff do not agree with the Planning Justification Report's suggestion that there are adequate nearby amenities— most day-to-day amenities are 1.5 km or more from the site. Future residents and employees accessing the University campus for day-to-day needs does not seem reasonable.	The non-residential component has increased from approximately 1,248 m² to 2,967 m² and now includes retail, office and flexible retail/office space. The flexible nature of the proposed non-residential spaces allows a variety of SAMU-permitted uses to establish over time, including uses capable of serving the day-to-day needs of residents and employees. The revised proposal also provides new municipal parkland, a comprehensive amenity network and improved pedestrian and active transportation connections. Accordingly, the development does not rely on the University campus as the source of amenities for future residents.
7.	Future submissions to demonstrate how they are meeting the minimum of 2 sq.m of non residential gross floor area, and how the day to day needs of residents are being addressed. The space for non-residential uses should be well planned, flexible, and of high quality. It is Staff's understanding the SAMU designation is neither a residential or employment designation, rather a mixed use designation that contemplates for residential uses while requiring sufficient supportive uses for future residents.	The revised proposal provides 2,967 m² of non-residential Building Floor Area across the development, consistent with the approximately 2,966 m² contemplated through the development-wide 62.7 m² methodology. As 170 and 180 Columbia Street West will remain separate parcels, site-specific rates of 2 m² per 158.7 m² of Habitable Floor Space at 170 Columbia Street West and 2 m² per 43 m² at 180 Columbia Street West are proposed to reflect the distribution and phasing of non-residential uses. The existing office building at 180 Columbia Street West will also remain in operation while Phases 1 and 2 are developed, maintaining an employment/non-residential presence during the interim condition. The proposed retail, office and flexible spaces will ultimately provide a range of employment, commercial and supportive uses for future residents, consistent with the mixed-use intent of the SAMU designation.
Height and Built Form		
8.	Staff acknowledge the height of buildings have been reduced to generally be in compliance with the 30 storey height limit with the exception of the two buildings adjacent to Columbia Street West. If heights greater than 30 storeys continue to be	The revised proposal maintains a maximum height of 35 storeys only for Phases 1 and 3, with the remaining buildings ranging from 25 to 30 storeys. The revised PJR provides a detailed assessment of the requested additional height

	proposed, future submissions to clearly demonstrate how Policy 3.4(6)-(11) is being addressed.	against the applicable criteria of Policies 3.4(6) through 3.4(11), including the Site's MTSA and Major Node location, built-form compatibility, community benefits, transit accessibility and the conclusions of the supporting shadow, wind, transportation, noise and compatibility studies.
9.	Furthermore, buildings exceeding maximum height limits shall achieve very high design quality, serve as landmark buildings and maintain a pedestrian scaled ground level. This is supported by Policies 3.4(8)-(13) of the Official Plan.	The two 35-storey buildings have been designed as prominent buildings framing Columbia Street West and are supported by high-quality architecture, active ground-floor uses, landscaping, pedestrian connections and a strong relationship with the public realm. The broader development incorporates a varied 25- to 35-storey height profile, avoiding a uniform wall of towers and establishing a deliberate hierarchy across the Site. Detailed architectural and landscape design will continue to be refined through the Site Plan Approval process.
10.	Further to the previous comments relating to minimum non-residential gross floor area, Policy 3.4 (11) of the Official Plan speaks to optimizing rather than maximizing density. As proposed, the site would increase height from an already increased height permission of 30 storeys, while not meeting the minimum amount of non-residential gross floor area for a SAMU designated site.	Addressed through the revised proposal. Resubmission No. 2 responds to Staff's concern regarding optimization rather than maximization by substantially strengthening the non-residential component while maintaining the reduced 25- to 35-storey height profile introduced through Resubmission No. 1. The proposal balances residential intensification with approximately 2,967 m² of non-residential floor area, dedicated municipal parkland, substantial indoor and outdoor amenity space, active transportation infrastructure and public realm improvements.
Major Transit Station Area Considerations		
11.	Notwithstanding the very minimal non-residential gross floor area, generally, the proposed development is consistent with the Station Area policies of the Official Plan. The development would introduce high-density mixed-use development within close proximity to the ION LRT stop. The subject lands are located in “Area A” of the Station Area with the intent to ensure the most density and transit supportive uses are in closest proximity to the LRT stop. The Station Area policies further provide that the	The applicant agrees that the Subject Lands are appropriate for significant transit-supportive intensification and mixed-use development within Area A of the Research and Technology Station Area. Resubmission No. 2 strengthens this relationship through increased non-residential uses, active ground-floor spaces, limited surface parking, bicycle parking and pedestrian-oriented site design. The proposal continues to support the intended function of Area A as a

	ground floor areas should provide for animated streetscapes, and that buildings should be mixed-use.	compact, high-intensity activity node in proximity to higher-order transit.
12.	Connectivity is a priority for the City's Station Areas. For the R&T Park Station Area in particular, a potential priority connection is identified in Schedule 'J3'. This connection runs through the subject sites. The rationale for the establishment of the priority connection is to break up the large blocks north of Columbia Street West and to enable greater pedestrian access to the R&T ION platform from the east side of the LRT tracks.	Addressed to the extent achievable through the Subject Lands. The revised master plan continues to provide a north-south connection through the development and maintains a 9.0-metre right-of-way along the eastern portion of 170 Columbia Street West. The connection provides access through the Site and toward the proposed municipal parkland while preserving the opportunity for longer-term connectivity to adjacent lands as the broader block redevelops.
13.	However, while a Right-of-Way is maintained in the proposed development splitting 170 from 180 Columbia, there does not appear to be a purposeful and enhanced connection from the development to the ION LRT stop. If this development is intended to be a Transit Oriented Development, a high-quality active transportation connection to the LRT stop is to be provided.	The development provides a comprehensive pedestrian and active transportation network throughout the Subject Lands and maintains the planned north-south connection contemplated by the Official Plan. The applicant has preserved the ability for this connection to form part of a broader future network; however, a direct connection from the Subject Lands to the R&T ION platform would require connections beyond the Subject Lands and coordination with adjacent properties and/or the rail/LRT corridor. It is therefore not appropriate for the current applications to establish infrastructure on lands outside the applicant's control. The proposal nonetheless preserves rather than precludes the City's longer-term connectivity objective.
14.	Future submissions to implement the potential priority connection as an emergency access/ active transportation corridor and how a connection to the existing LRT stop has been considered and implemented.	Acknowledged.
Complete Communities		
15.	The Official Plan requires development in the city to contribute to creating a complete community, which is created through the inclusion of a range of community elements (parks, open space, active transportation etc.) and "community infrastructure". Creating a new large urban community in an area that was not previously planned for residential	Resubmission No. 2 materially strengthens the complete-community elements of the proposal. In addition to the significant residential component, the development now provides approximately 2,967 m² of retail, office and flexible

	uses puts the onus on the proponent to help create a more complete community. While Staff recognize a mixture of uses are being proposed, the balance of uses is heavily skewed towards primary residential uses.	retail/office space, a dedicated municipal parkland block, Common Outdoor Areas, extensive indoor and outdoor resident amenity spaces, pedestrian connections and substantial bicycle parking. The revised proposal therefore provides a broader mix of land uses, open spaces and community-supportive features than contemplated through the previous submission.
16.	Policy 3.7 of the Official Plan outlines elements that are required to create a complete community within the City's Planning Districts. Policy 3.7.1 (1)-(4) are noted below: (1) The City shall encourage opportunities to enhance the availability of locally serving retail and service commercial facilities at appropriate locations within residential Planning Districts, thereby reducing travel times for day to day commercial needs. This Plan envisions convenient access to healthy food as a key priority and as such, small to mid-size food stores that are well distributed throughout the community are preferred over fewer, large format food stores. To encourage convenient access to food stores, the City will: (a) Plan for the provision of one small to mid-size food store for every 10,000 residents; and, (b) Plan for the distribution of food stores uses such that all residents will have access to a food store within one kilometre of their residence. (2) Development will reinforce neighbourhood focal points, strengthen linkages to existing and future parks, trails and open space, public transportation stops, cycling networks, as well as other community infrastructure. (3) The City shall encourage appropriate supporting commercial facilities and services to meet the daily needs of employees within Planning Districts that function predominantly as employment areas. (4) Access to public transit and active transportation networks are an important component of a complete community. The City supports robust transit and active transportation networks that are well connected within and between Planning Districts	The proposal advances the objectives of Policy 3.7 through the inclusion of new locally serving non-residential space, strengthened connections to transit and active transportation infrastructure, and the introduction of formal municipal parkland and other outdoor spaces. The proposed retail and flexible commercial spaces provide opportunities for businesses and services that can address the day-to-day needs of residents and employees. While the proposal does not specifically secure a food store, the Official Plan identifies such uses as an objective to be encouraged and the proposed SAMU permissions allow a range of commercial uses to respond to future market demand.
17.	With the introduction of a significant number of new residents to the area, it is noted that the current development proposed only minimal access to community infrastructure and day-to-day convenience uses for residents and employees alike. As a previous employment area, there is little to no current access to community infrastructure and community spaces, and shall not be reliant on the university campus.	Non-residential Building Floor Area has increased by approximately 1,719 m², including a substantial new office component and additional retail space. The development also now includes a dedicated municipal parkland block, together with Common Outdoor Areas and approximately 4,657 m² of building-specific indoor and outdoor amenity space. These elements substantially improve access to open

		space, recreation, employment and potential day-to-day services directly within the development rather than relying on the University campus.
Urban Design Policies in OP		
18.	The development is subject to the Official Plan's general urban design policies (3.9), as well as the specific policies for intensification within Nodes and Corridors and Major Transit Station Areas (3.5.4). Collectively, these policies provide direction for building and site design to ensure high quality buildings and site designs that are attractive, comfortable and prioritize pedestrian movements and convenient access to active transportation and transit networks.	The revised development has been designed having regard to the applicable urban design policies of the Official Plan. The proposal incorporates active ground-floor uses, pedestrian-oriented building frontages, a hierarchy of public and private open spaces, internal pedestrian connections, bicycle parking and a varied tower composition. Detailed design elements will be determined at the Site Plan Application stage.
19.	Building massing and orientation should ensure convenient, comfortable and safe pedestrian movements through the site and from the site to the R&T Park ION platform from both the east and west sides of the LRT tracks. North-south site circulation should generally align with Schedule 'J3', for pedestrians and cyclists who are accessing the R&T Park ION platform from the crossover point to the east of the LRT tracks. Sufficient, functional and well-designed outdoor landscaped open space should be provided to support the proposed density.	The revised master plan provides an interconnected pedestrian circulation network through the Subject Lands and maintains the north-south connection intended to support longer-term access through the broader Station Area. The Site also provides a comprehensive open-space network consisting of dedicated municipal parkland, Common Outdoor Areas and building-specific indoor and outdoor amenity spaces. The updated Pedestrian Level Wind Study confirms that appropriate pedestrian comfort and safety conditions can be achieved, subject to localized mitigation measures, which have also informed the current landscape design. The proposed development therefore provides functional and appropriately distributed outdoor spaces commensurate with the proposed density.
Environmental Considerations		
20.	Comments related to environmental considerations were submitted for the first submission application. There are no additional environmental comments for this second submission.	Acknowledged.
Heritage		

21.	Heritage Planning staff does not require the submission of an archeological assessment; however, the applicant should be made aware that: a) If archaeological resources are discovered during future development or site alteration of the subject property, the applicant will need to immediately cease alteration/development and contact the Ministry of Citizenship and Multiculturalism. If it is determined that additional investigation and reporting of the archaeological resources is needed, a licensed archaeologist will be required to conduct this field work in compliance with S. 48(a) of the Ontario Heritage Act; and/or, b) If human remains/or a grave site is discovered during development or site alteration of the subject property, the applicant will need to immediately cease alteration and must contact the property authorities (police or coroner) and the Registrar at the Bereavement Authority of Ontario in compliance with the Funeral, Burial and Cremation Services Act, 2002 S.96 and associated Regulations.	Acknowledged.
Ministry Approval		
22.	It is Staff's understanding as of January 1, 2025 Official Plan amendments, establishing, changing or revoking any policies required as part of a protected major transit station area (PMTSA) in accordance with subsections 17(15) or (16) of the Planning Act authorizing uses of any land within a PMTSA require Ministerial Approval. However, the Province recently proposed Bill 60 which based on Staff's understanding does not require Ministry approval if residential uses would be authorized on all of the land subject to the amendment that is within the protected major transit station area if the amendment came into effect as adopted.	Acknowledged.
PART B - ZONING BY-LAW AMENDMENT		
Zoning		
23.	It is Staff's understanding the Applicant has amended the proposed zoning to be aligned with the updated Official Plan designation of Station Area Mixed Use. As such, 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.	The revised Zoning By-law Amendment has been updated to align with the Station Area Mixed Use designation and seeks to rezone the Subject Lands from the existing '(Holding) Business Employment Two A ((H)E2A-81)' Zone to a site-specific '(Holding) Station Area Mixed Use ((H)SAMU-105)' Zone. The requested site-specific provisions have been reviewed and refined through Resubmission No. 2 to reflect the current development concept and reduce or remove

	Where zoning relief is requested, it must be supported by compelling rationale, and demonstrated that other options were properly considered. Staff encourage the Applicant to comply to the best of their ability and reduce the relief proposed. Future submissions to include a draft OPA and ZBA for Staff's review.	relief where no longer required. The revised Planning Justification Report provides supporting rationale for the remaining requested provisions, including matters related to density, height, setbacks, tower separation, amenity areas, parking, bicycle parking, railway separation and non-residential uses. Draft Official Plan and Zoning By-law Amendments are included with the current resubmission for Staff review.
24.	It is Staff's understanding two individual site-specific provisions are being sought and are to be applied individually to the respective parcels. Based on this, each property/phase and building is to be zoning compliant and not reliant on each other.	The updated proposal contemplates the establishment of zoning regulations specific to 170 and 180 Columbia Street West, whereby the applicable regulations will be assessed on the basis of each property as a whole, rather than establishing separate zoning requirements for each individual phase of development. Given the integrated and master-planned nature of the proposal, a site-specific provision is proposed to clarify that 170 Columbia Street West and 180 Columbia Street West will each be treated as an individual lot for zoning purposes, with Phases 1 and 2 forming part of the 170 Columbia Street West lot and Phases 3, 4 and 5 forming part of the 180 Columbia Street West lot. The internal boundaries between the respective phases are intended solely as phasing lines and will not constitute lot lines for the purposes of applying the Zoning By-law. Accordingly, applicable zoning requirements and site statistics, including parking, amenity areas, Common Outdoor Areas, landscaped open space and other applicable requirements, will be assessed comprehensively within each respective property, rather than independently for each phase or building. Setbacks and separations required from a lot line will continue to be measured from the applicable existing property lines, including the property line separating 170 and 180 Columbia Street West. This approach maintains each property as a distinct zoning lot while appropriately recognizing the coordinated manner in which the individual

		phases within each property are planned and intended to function. It also avoids artificial zoning deficiencies or unnecessary duplication of facilities that could otherwise result from requiring each individual phase to independently satisfy the applicable zoning regulations.
25.	Refer to Zoning Table provided in the Post-Circulation comment package.	Acknowledged.
26.	Staff do not oppose the following zoning relief: ● Side yard setback – to recognize pinch points ● Maximum streetline 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.
27.	Staff require additional information for the following zoning relief: ● Height of first storey – recognizing the mezzanine is not in compliance ● Tower stepback – additional information required speaking to how the intent of the provision is being satisfied ● 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 ● Minimum Streetline Setback & Underground parking setback – future submissions to demonstrate there is no negative impact to existing/ future infrastructure and the public realm ● 3.R.1 – Additional discussions to be had with the Region of Waterloo	The requested zoning provisions have been reconsidered through Resubmission No. 2. Relief relating to first-storey height and tower stepback is no longer identified among the current requested site-specific provisions. The mezzanine level has been removed. With respect to rooftop amenity space, the revised proposal continues to seek relief from the 20% cap for certain phases; however, the current development provides a comprehensive mix of indoor, at-grade and rooftop amenity spaces, together with Common Outdoor Areas and dedicated municipal parkland. An updated Pedestrian Level Wind Study has also been prepared and confirms that appropriate pedestrian comfort and safety conditions can be achieved subject to localized mitigation. With respect to the minimum street line and underground parking setbacks, the requested relief has been refined and additional rationale is provided in the revised PJR. The underground parking setback applies only to the below-

		grade structure and has been reviewed in the context of servicing and public realm considerations.
28.	Staff currently do not support the following request for relief and require additional justification as to how the Official Plan is being satisfied: ● Density ● Building Height ● Non Residential Gross Floor Area	The current proposal has evolved materially since the previous resubmission, including a reduction to 1,907 dwelling units and 2,889 bedrooms, a varied 25- to 35-storey height profile, formal municipal parkland dedication, expanded amenity areas and a significantly increased non-residential component. With respect to non-residential floor area, the proposal has increased from approximately 1,248 m² to 2,967 m². When considered across the entirety of the development, the proposed non-residential floor area is consistent with the approximately 2,966 m² contemplated through the development-wide 62.7 m² methodology. As 170 and 180 Columbia Street West will remain separate parcels, site-specific rates of 2 m² per 158.7 m² of Habitable Floor Space at 170 Columbia Street West and 2 m² per 43 m² at 180 Columbia Street West are proposed to reflect the distribution and phasing of non-residential uses while allowing each parcel to independently comply. The existing office building at 180 Columbia Street West will also remain in operation during the development of Phases 1 and 2, with the balance of the new non-residential floor area delivered through the subsequent redevelopment of 180 Columbia Street West. Please see the revised Planning Justification Report for additional rationale regarding density, height and non-residential floor area.
Loading		
29.	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.

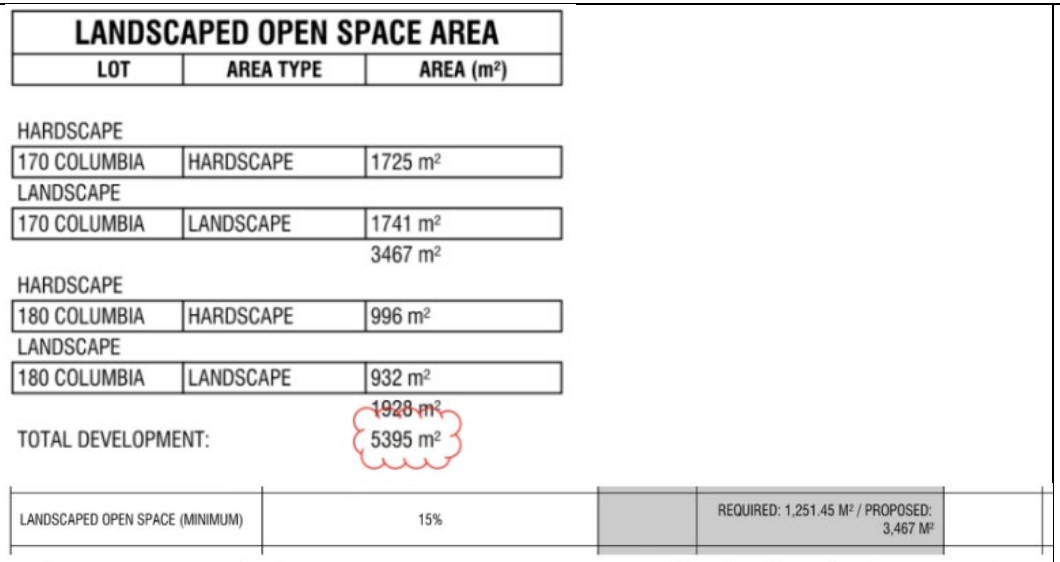
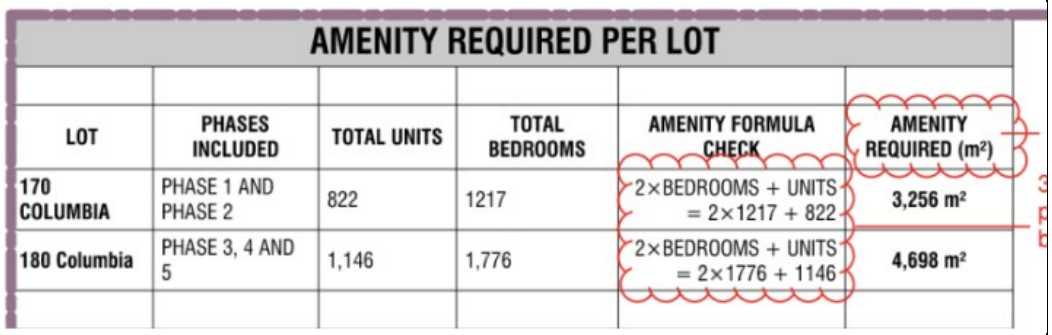
		Loading areas were replanned with no amenities adjacent.
Bedroom Mixture		
30.	Staff appreciate the Applicant incorporated 3-bedroom units into the second submission. However, it appears only two of the 1,968 units for the entire development are proposed as a 3-bedroom. There are several policies within the Official Plan supporting the inclusion of multi-bedroom units, including 3.4(6) which speaks to increased height requests.	The current proposal includes a broader mix of unit types, including bachelor, one-, two- and three-bedroom units. Resubmission No. 2 now provides five (5) three-bedroom units, all within Phase 1, together with a substantial number of two-bedroom units across the development. The revised PJR recognizes the importance of providing a range and mix of housing options and assesses the proposal against the applicable Official Plan policies, including those relating to increased height. While the number of three-bedroom units remains limited relative to the overall unit count, the proposal provides a meaningful mix of larger units through the significant proportion of two-bedroom units and maintains flexibility for further refinement of unit layouts through detailed design.
31.	Furthermore, Staff note the 3 bedroom units were identified as “inbound”. Based on Staff’s understanding, the Building Department has policies relating to inbound bedrooms and additional information is required to determine if these units are 3 bed or 2 bed with a den. Staff strongly encourage the Applicant to incorporate more 3 bedroom units.	The current unit mix has been updated and the five (5) three-bedroom units are now identified within the architectural plans as three-bedroom dwelling units rather than relying on the previous “inbound” bedroom configuration. The applicant has therefore clarified the unit classification in response to Staff's comment. The balance of the development continues to include a substantial number of two-bedroom units, providing additional housing options.
Parkland Dedication		
32.	Staff recognize the unique approach of outdoor greenspace by way of a common outdoor area with an easement. However, Staff are not supportive of cash-in-lieu for this development, and will require land	The approach to parkland has been substantially revised through Resubmission No. 2. The previous cash-in-lieu / privately owned open-space approach is no longer proposed. Instead, the revised master plan provides for a formal municipal parkland dedication at the north end of 170 Columbia Street West. Approximately 1,463 m² of parkland is proposed, together with approximately 294 m² associated with the future right-of-way, for a combined area of

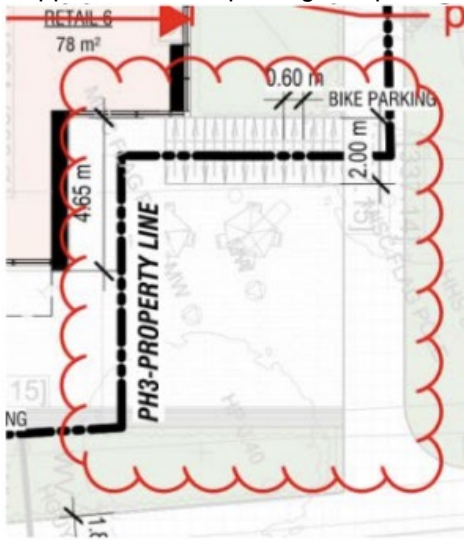
	dedication to the City. Additional justification is required as to why unencumbered land cannot be conveyed to the City. Staff recognize the Planning Justification Report spoke to infrastructure constraints, but more information is needed.	approximately 1,757 m². Phases 1 and 2 have been shifted south to accommodate the dedicated park block.
33.	If a POPS is to be accepted by the City, additional discussions are to be had regarding the evaluation for parkland, size, placement and location. Furthermore, the Applicant would be required to demonstrate how the City's Guidelines for Privately Owned Public Accessible Spaces are being satisfied. Staff encourage the Applicant to explore opportunities for the dedication of unencumbered land.	A POPS is no longer proposed as the primary parkland solution. Resubmission No. 2 provides formal municipal parkland dedication instead, consistent with Staff's preference for unencumbered land dedication.
34.	Parkland Staff have reviewed the proposal, and have indicated their preference for parkland dedication is at the north end of 170 Columbia Street West, in the location where building #2 is shown currently, adjacent to the future active transportation corridor. Additional comments and requirements have been included in Part K of this comment report. Staff note, if buildings are proposed in front of the future park space, future submissions to ensure there are visual connections between the park space and Columbia Street.	The revised master plan responds directly to Parks Staff's preferred location by providing the municipal parkland block at the north end of 170 Columbia Street West, adjacent to the proposed future active transportation/right-of-way connection. Buildings 1 and 2 have been shifted south to accommodate this park location. The revised layout also maintains pedestrian and visual connectivity through the Site toward the park and preserves opportunities for broader future connectivity.
35.	Planning Staff are open to coordinating a meeting between the Applicant and Parks to discuss a potential location for parkland dedication.	Further discussions with City staff regarding the preferred parkland approach informed the current Resubmission No. 2 master plan. Those discussions resulted in the relocation of the parkland to the north end of 170 Columbia Street West and the shift of Phases 1 and 2 to the south.
36.	Furthermore, as Staff indicated in the previous comment letter, Staff do not support counting the proposed POPS space as landscaped space, amenity area, common outdoor area, etc... Both the requirements for parkland dedication and landscape open space are to be met.	The current proposal distinguishes between the municipal parkland dedication, Common Outdoor Areas, landscaped areas and building-specific amenity spaces. The dedicated municipal parkland is not relied upon to satisfy the applicable zoning requirements for Amenity Area or Common Outdoor Area.
Mezzanine		

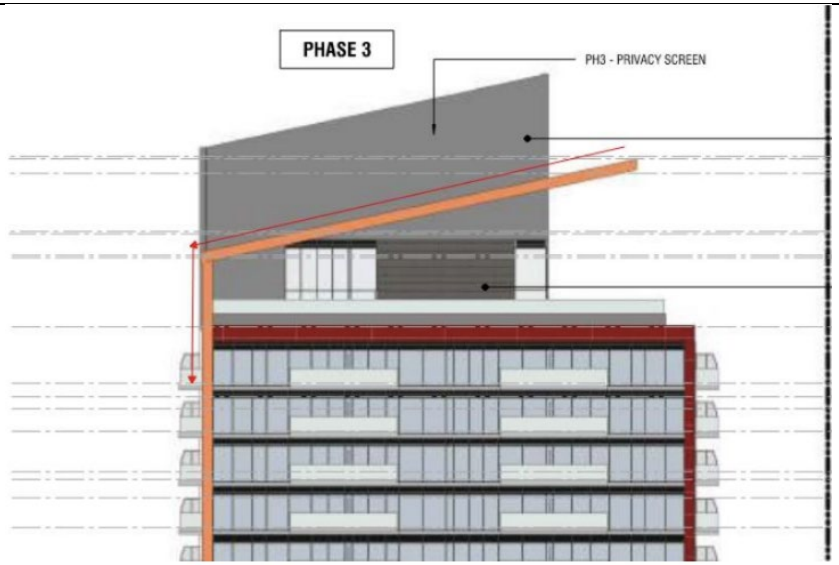
37.	It appears the modified mezzanines identified on drawing A104 in the Architectural package do not meet the definition of mezzanine in Zoning By-Law 2018-050, or the regulations in provision 3.M.2B. Based on this, the mezzanine will be considered a storey as identified in the Planning Justification 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.
Holding Provision		
38.	The lands will continue to be subject to a holding, relating to the rail corridor, SAMU and addition provisions provided by the Region in comment letter #1.	Acknowledged.
39.	Staff recognize the Applicant provided a Transportation Noise and Vibration Assessment, but is the City's understanding the Region is not in support of the 9m setback proposed. Furthermore, several recommendations relating to noise attenuation were included. The holding will be maintained to ensure that through the site plan process appropriate attenuation has been implemented.	Acknowledged.
Reduced Setback to Railway		
40.	Based on the submission materials and comments received from the Region of Waterloo, Staff are currently not in support of the reduced side yard setback of 9m from 15m.	The requested 9.0-metre setback from the railway right-of-way continues to be proposed. In response to Staff and Regional comments, additional technical assessment has been undertaken by Dillon Consulting Limited, including an updated Transportation Noise and Vibration Assessment and a Development Viability Assessment / Rail Safety and Risk Mitigation Study. The latter specifically assesses the proposed reduced railway setback having regard to the nature and frequency of rail operations, the proposed site and building configuration, and applicable rail safety considerations. The assessment concludes that the proposed development does not exceed the applicable risk criteria and that

		additional physical safety measures, such as a crash wall or safety berm, are not required. The area immediately adjacent to the railway is also primarily occupied by non-residential site functions, including the internal service road, loading/access areas and parking ramp, with residential occupancy generally located above and further removed from the railway corridor. On this basis, the applicant continues to request the 9.0-metre setback and considers the requested site-specific provision to be appropriately supported by the updated technical work.
41.	Staff are willing to coordinate a meeting between the Region of Waterloo and the Applicant to discuss the Transportation Noise and Vibration Assessment Report. City Staff have sought confirmation of this understanding from the Region which is outstanding.	Addressed through additional technical work and continued coordination. Following the previous submission, the railway interface has been subject to further technical review. The updated Transportation Noise and Vibration Assessment confirms that vibration associated with ION LRT operations is below the applicable criterion, while freight rail monitoring identified the need for mitigation measures to address vibration associated with freight operations. Appropriate mitigation measures will be further developed and confirmed through detailed design and the Site Plan Approval process.
Affordable Housing & Inclusionary Zoning		
42.	The Lands are located within Research and Technology Station Area and are therefore subject to the Official Plan policies and Zoning By-law regulations related to Inclusionary Zoning. Please note that the City of Waterloo approved the policies and regulation for Inclusionary Zoning through Official Plan Amendment No. 50 and By-law 2024-058 which came into effect on September 12, 2024. The initial date for implementation of Inclusionary Zoning was to be March 31, 2025.	Acknowledged.
43.	In March 2025, Council approved Zoning By-law 2025-011, which amended the date of Inclusionary Zoning implementation to ‘an undetermined date in the future.’	Acknowledged.
44.	In February 2026, Council approved report IPPW2026-001 which provided an Inclusionary Zoning By-law Amendment Framework for implementation date to be July 1, 2027. In addition, the framework proposed to exclude Affordable Dwelling from the density provisions of the	Acknowledged.

	Zoning By-law. These Council approved provisions would be implemented through a future Zoning By-law Amendment. The City proposes to include the implementation date for Inclusionary Zoning of July 1, 2027, and the exemption of Affordable Dwelling from the density provision of the Zoning By-law through a proposed 'Housekeeping ' Zoning By-law Amendment at the Council meeting scheduled for Monday July 13, 2026. It should be noted that the province filed Ontario Regulation. 15/26 which sets the implementation date for Inclusionary Zoning to July 1, 2027, only for the three cities of Toronto, Mississauga, and Kitchener. These three municipalities previously had an implementation date approved for Inclusionary Zoning earlier than July 1, 2027.	
PART C - OTHER CONSIDERATIONS		
Site Plan & Miscellaneous Comments		
45.	Staff have provided preliminary high level site plan comments for implementation as it may impact proposed zoning relief. ● Ensure pedestrian doors are inset to create a step out into the drive aisle/ visibility for cars. ● Ensure accessible aisles are dedicated to the accessible space and not being used for multiple purposes (i.e. access to bike room). ● Common outdoor area to be further reviewed ● Landscape open space to be further reviewed ● Amenity space to be further reviewed ● Bike parking to be further reviewed ● Vehicular parking (EV, location, movement, etc...) to be further reviewed ● Loading (location, movement, etc...) to be further reviewed ● Landscape number in stats chart on pg. A100 does not align with LOS figure on pg. A100b	1) Underground levels reviewed and pedestrian doors have been inset to provide more pedestrian security. 2) Accessible aisles have blue colour 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

		
46.	Update amenity calculation. Zoning requires 3 sq.m for the first bedroom and 2 sq.m for each additional bedroom. 	Refer to Appendix # 1 prepared by AAA Architects and submitted as part of the Resubmission No. 2 package. The amenity area requirement has been calculated based on 3 m² for the first bedroom of each dwelling unit and 2 m² for each additional bedroom.

47.	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 in the architectural package,
48.	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.

		
Condominium Application		
49.	Staff appreciate the additional information provided in the Planning Justification Report regarding the staging of development. Staff encourage the Applicant to further consider how future severance or condominium applications will impact zoning relief and future servicing.	Noted and addressed through the revised zoning framework. The applicant has further considered the implications of future condominium ownership and phasing arrangements as part of Resubmission No. 2. Given the integrated nature of the master plan, the revised Zoning By-law Amendment proposes a site-specific provision whereby 170 and 180 Columbia Street West are deemed to constitute individual lots for the purposes of applying applicable zoning regulations, regardless of future divisions into lots, blocks, parcels, phases, units of ownership or other ownership arrangements. This approach is intended to ensure that future condominium or ownership arrangements do not inadvertently create zoning deficiencies for shared site functions and statistics. Notwithstanding this provision, setbacks and separations from lot lines will continue to be measured from the applicable property lines. Future servicing and easement requirements associated with

		condominium registration or other ownership arrangements will be addressed through the applicable detailed approval processes.
176 Columbia St W		
50.	Staff recognize the development agreement and associated easement on 176 Columbia Street W in favour of 170 & 180 Columbia Street W will need to be updated to reflect the proposed development. Additional easements may be required as well and will require a consent application.	Acknowledged.
51.	Staff require additional information on how the proposed developments will function with 176 Columbia Street W as it currently exists and any future development. Staff note the recommended SAMU zone includes a holding provision for master planning.	The proposed development has been planned to have regard to the continued existence and operation of 176 Columbia Street West, including the existing access and easement relationships between the properties. The current applications do not rely on the redevelopment of 176 Columbia Street West to facilitate the proposed development. At the same time, the master plan has been designed to preserve opportunities for longer-term coordination and connectivity should 176 Columbia Street West redevelop in the future.
52.	Staff also require confirmation from 176 Columbia St W they are in support of the development utilizing the existing right of way prior to proceeding to Council for recommendation to the satisfaction of the City.	Acknowledged.
Previous COA Applications		
53.	The Applicant received approval from the Committee of Adjustment in October 2021 to sever an area of approximately 237 sq.m (Part 23 and Part 12 on 58R-8516) and consolidate to 170 Columbia St West. It is Staff's understanding the registration was completed in June 2025 and final documents from the Land Registry Office are expected shortly.	The applicant has noted the registration is complete and all final documents have been completed.
Proposed Right of Way		
54.	It is Planning Staff's understanding the Priority Connection identified on Schedule J3 of the Official Plan is to function as an emergency access and transportation connection	The proposed 9.0-metre right-of-way along the eastern portion of 170 Columbia Street West has been maintained through Resubmission No. 2 and is intended to provide

	for this development. Staff encourage the Applicant to review vehicular movement/ access for Building 2.	circulation through the development, access toward the proposed municipal parkland and an opportunity for longer-term connectivity with adjacent lands. The configuration of Phases 1 and 2 has also been revised through the current submission, including shifting both buildings south to accommodate the municipal parkland dedication. Vehicular movement and access associated with Phase 2 have therefore been reconsidered as part of the revised overall circulation strategy.
Property Lines		
55.	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?	The property lines shown for Phase 2 are intended to illustrate the anticipated future development/ownership configuration associated with the phased implementation of the master plan, including providing Phase 2 with frontage on the proposed public right-of-way. As part of Resubmission No. 2, a site-specific zoning provision is proposed to deem 170 and 180 Columbia Street West as individual lots for the purposes of applying applicable zoning regulations, while setbacks and separations from lot lines will continue to be measured from the existing property lines and that internal phasing lines will not be treated as lot lines. Any future creation or adjustment of property boundaries will be addressed through the appropriate subsequent consent and/or condominium process.
Land Use Compatibility		
56.	Comments have been received from the Peer Review and are attached as Appendix E. Future submission to address comments and demonstrate how they have been addressed.	Acknowledged.
Noise		
57.	Comments from the peer review are outstanding and an updated comment letter will be issued once they are received.	Acknowledged.

PART D - URBAN DESIGN COMMENTS		
58.	Comments provided on the site plan pre-consultation application are also applicable.	Acknowledged.
59.	The previous Wind Study concluded that there were notable wind speeds in and around the site that would have implications on the comfort at grade, and the usability of the public realm. Mitigation measures were recommended, however not applied to the resubmission. That said, buildings have moved so wind impacts will have been altered. UD staff request that an update to the Wind Study be provided through the rezoning application process to ensure that wind levels are comfortable and safe at grade. Staff have concerns that an updated Wind Study should be required prior to Site Plan to determine whether larger mitigation measures are necessary.	An updated Pedestrian Level Wind Study, prepared by the Boundary Layer Wind Tunnel Laboratory. The updated Study assesses the revised five-tower development, including the current building locations and heights, and evaluates pedestrian wind safety and comfort at ground level, along surrounding sidewalks and within outdoor amenity areas. The Study concludes that the proposed development has a moderate and generally localized influence on wind conditions. During the summer, all tested sidewalk locations are suitable for standing or better, while surrounding areas generally remain appropriate for their intended use during the winter. All but one tested location satisfies the pedestrian safety criterion. Localized mitigation is recommended at certain on-site building entrances and at the northwest corner of the site. The updated Landscape Plan incorporates mitigation measures reviewed positively by the wind consultant, including a barrier fence along the western property boundary and strategic landscaping around building corners, entrances and outdoor amenity areas. Accordingly, the updated Study demonstrates that appropriate pedestrian wind conditions can be achieved through localized mitigation, with the detailed design and effectiveness of these measures to be further refined and verified through subsequent wind testing as part of the Site Plan process.
60.	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.	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 in the architectural package, for the applicable diagrams and details. The roof drainage design and associated construction details will be further developed during subsequent design stages.
PART E - DEVELOPMENT ENGINEERING COMMENTS		
61.	The City is generally satisfied with the approach to development laid out in the FSR with respect to sanitary and storm sewer capacities and watermain supply.	Acknowledged.
62.	A Wastewater Capacity Modelling Fee of $555.00 is required to be paid to the City of Waterloo for sanitary modelling, per Schedule “A” of the City of Waterloo Fees and Charges Bylaw. Please see attached modelling report for the proposed peak sanitary flow of 41.46 L/s, confirming available capacity for the proposed peak sanitary flow.	Acknowledged.
63.	Further details will be required during the Site Plan submission process and detailed design stage for review and acceptance by the City of Waterloo Engineering Services division.	Acknowledged.
64.	Please note proposed hydro work on the North side of Columbia Street W (see attached). Please contact ENOVA for more information.	Acknowledged.
65.	See attached servicing memo and drawing.	Acknowledged.
PART F - LANDSCAPE ARCHITECTURE		
66.	Engineering Services landscape staff has reviewed the submitted material and offers the following feedback to be addressed prior to rezoning approval. Note: several of the 1st submission comments were related to anticipated Site Plan stage deliverables and considerations and continue to apply. Further details will be required during the Site Plan process and detailed design stage for review and acceptance.	Acknowledged.
67.	Staff acknowledge and appreciate the provision of an Arborist Report and Tree Inventory Plan included with the submission. First submission comments regarding compensation, tree removal clearances, etc. continue to apply. Details associated with these are to be finalized through the Site Plan Approval stage.	Acknowledged.

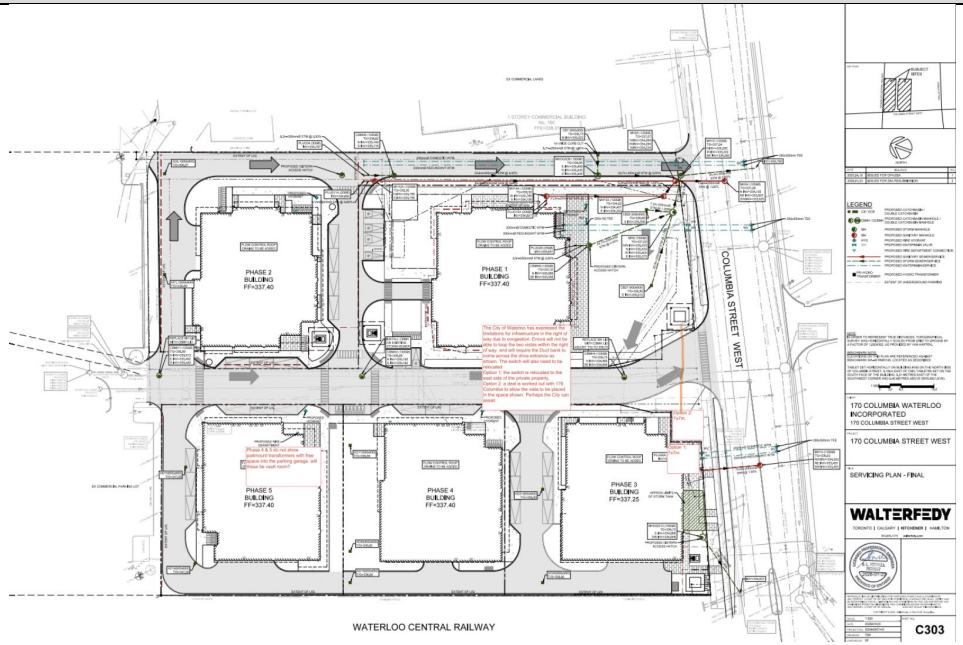
68.	Minor comment: ensure that trees to be removed vs. trees to be preserved are differentiated graphically on the plan.	Acknowledged. Refer to 1/VMP1 (Vegetation Management Plan)
69.	Further to the above, graphically show tree protection hoarding for trees to be preserved (appears in the legend but not on plan).	Acknowledged, tree protection hoarding for preserved trees are added. Refer to 1/VMP1 (Vegetation Management Plan).
70.	Staff appreciate the incorporation of common outdoor space at grade along the Columbia Street frontage. Refer to Parks comments for feedback regarding Parkland Dedication. Pending the final building/site layout, the landscape space between the built form and Columbia Street should serve to activate the streetscape and transition from an arterial road to the built form appropriately. These details can be further refined through the Site Plan stage.	Acknowledged.
71.	The response notes that the north-south axis established by the priority connection through the site will accommodate a future pedestrian route through the subject development area and ultimately to the existing transit hub that is northwest of the lands. Staff appreciate that this corridor does present a placeholding opportunity for future connections to the LRT node and requests that this and other opportunities are considered through the Site Plan stage to ensure that ample pedestrian scale routes are established within and through the development block.	Acknowledged.
72.	As summarized in the PJR, there were recommendations outlined in the pedestrian level wind study based on the preliminary design. While some mitigation strategies are provided conceptually on the landscape plan, final requirements are to be checked against final wind tunnel testing and addressed through the detailed Site Plan design stage.	Acknowledged.
73.	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		

74.	The subject site is located in The Research & Technology Station Area. As per Bill 185, the subject site is not required to provide parking other than parking facilities for bicycles. City Staff recommend providing parking to meet the needs of the site without reliance on the municipal right-of-way. The parking review provided in the Transportation Impact Study (TIS) indicates a higher demand for parking than the rate being provided.	Refer to Response Letter to Transportation Impact Study (TIS) prepared by GHD dated August 6, 2026. As discussed in **Section 7** of the GHD August 2026 TIS Response Letter, the subject site is required to provide 45 parking spaces for retail and office uses. It should be noted that the proposed retail uses are expected to be predominately used by the development's residents and visitors. The visitors of the site apartments are expected to use / share the retail and office parking spaces. Based on the City Zoning By-law parking requirements, the subject site is required to provide a total of 1,173 bicycle parking spaces for the residential apartment, retail and office uses.
75.	The signal at the site driveway (access 1) at Columbia Street should be re-evaluated now that the signal has been removed. Staff recommend that a new turning movement count be conducted to better understand how this change has impacted the site driveway. Table 6 provided in the TIS states that south-bound left/right/through lane and north-bound right/left/through lane – is this analysis still valid?	No updated traffic count was undertaken at Access 1 to account for the traffic change due to the removal of signal. The traffic analysis is an estimation based on capacity constraints. Under STOP control, the northbound and southbound left turns will decrease due to Columbia Street through movement volumes and gaps that the signal would have provided. However, as indicated in **Table 5** of the GHD August 2026 TIS Response Letter, the SYNCHRO analysis under STOP control at Access 1 indicated good Levels of service 'C' or better with v/c ratios of 0.49 or less at all movements. With respect to queuing, the analysis results indicate 20m or less queues during the AM and PM peaks, which can be accommodated at all movements.
76.	Table 7 – Queues and available spacing (AM peak hour – 95th percentile) identifies that there is insufficient storage for westbound through traffic queueing at the LRT rail crossing. This is an existing condition and remains under background and total traffic conditions.	Noted. There are also no traffic operational and queuing concerns from the Region Transportation staff (Region of Waterloo March 18, 2026, comment #6). The eastbound queues at Phillip Street in the PM peak hour may extend beyond Access 2. However, Access 2 is not blocked by this queuing as it is a right-in / right-out access.

	Table 8 (PM peak hour – 95th percentile) shows that the westbound through will block site access 1 as mentioned above. In the PM peak, eastbound through/right movement at Phillip Street will queue past Access 2 under background and total traffic conditions.	
77.	If access 2 remains a vehicular access, transportation Staff recommend that right-in/right-out only driveway be considered for Access 2.	As indicated in Sections 4 to 6 of the GHD August 2026 TIS Response Letter, the site trip assignment and capacity analysis considers Access 2 as a right-in/right-out only driveway at Columbia Street. No traffic operational concerns with the right-in/right-out, LOS A and v/c ratios of 0.47 or less.
General Comments		
78.	Upon further review of the Potential Priority Connection identified on Schedule J3 of the Official Plan, Staff suggest that this be an active transportation connection and emergency access for fire services. The 9 metre allowance provided on the east side of 170 Columbia Street is sufficient to accommodate this connection. Further discussion is required regarding this being a private connection with a public access easement or if this connection shall be conveyed to the City.	Acknowledged.
79.	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 current site plan shows a decrease to 1907 units. **Tables 7 and 8** of the GHD August 2026 TIS Response Letter shows that the subject site is required to provide a total of 1,173 bicycle parking spaces for the residential apartment, retail and office uses. As shown in **Table 6** of the GHD August 2026 TIS Response Letter, the subject site is required to provided 45 parking spaces for retail and office uses. It should be noted that the proposed retail uses are expected to be predominately used by the development's residents and visitors. The visitors of the site apartments are expected to use / share the retail and office parking spaces.
PART H - BUILDING STANDARDS		
80.	To be provided under separate cover.	Acknowledged.

PART I - FIRE		
81.	To be provided under separate cover.	Acknowledged.
PART J - PARKS, FORESTRY AND COMMUNITY SERVICES		
82.	The parkland dedication shall be in accordance with the Planning Act and the City of Waterloo Parkland Dedication bylaw. PFCS requests that 100% parkland dedication be satisfied through the provision of land and does not support the provision of cash-in-lieu for this development. The land dedication shall be in one piece, not multiple smaller pieces. PFCS requests that the required parkland dedication for both 170 and 180 Columbia Street West be provided in one piece as described below. Considering the site constraints and the future active transportation corridor along the east side of 170 Columbia Street West, PFCS will accept the parkland dedication at the north end of 170 Columbia Street West, in the location where building #2 is shown currently, adjacent to the future active transportation corridor.	Resubmission No. 2 has been substantially revised to respond directly to Staff's requested parkland approach. The previous cash-in-lieu / privately owned open-space approach is no longer proposed. Instead, the revised master plan provides for formal municipal parkland dedication in a single consolidated block at the north end of 170 Columbia Street West, adjacent to the future active transportation/right-of-way connection, consistent with the location identified by Staff. Phases 1 and 2 have been shifted south to accommodate the 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.
83.	PFCS requires that the proposed land dedication be rectangular in shape (between 1:1 and 1:2), or as close as possible. No sharp angles or oddly shaped forms will be accepted.	The configuration of the proposed parkland dedication has been revised in conjunction with the relocation of Phases 1 and 2 and is provided as a single, regular-shaped block at the north end of 170 Columbia Street West. The park block avoids the fragmented open-space configuration contemplated through the previous submission and has been designed to provide a functional area capable of accommodating future park programming. The detailed configuration and boundaries of the park block can continue to be refined in consultation with Staff through the subsequent approval process.
84.	The expectation is that at full buildout the park block will include amenities that support both active and passive uses for the community, not just serve as passive public gathering point. As such, the park block shall include amenities such as playground, play fields, play courts (e.g. basketball, tennis, pickleball, etc.), skating rink, gathering areas, etc. The applicant should complete a parks needs assessment, to help understand specific active and passive recreational needs in this context. The amenities provided on the	The applicant acknowledges Staff's expectation that the future municipal park accommodate a combination of active and passive recreational opportunities. Resubmission No. 2 establishes the land for this purpose through the provision of a consolidated municipal park block rather than attempting to prescribe the ultimate programming of the park through the current OPA/ZBA applications.

	park block shall be based on this assessment and fulfil both the active and passive recreation needs of the community.	
85.	The proposed park block shall not include an off-leash amenity for dogs. In accordance with the Parkland Strategy, when intensification results in high densities, opportunities for creating dog facilities within the footprint of these developments need to be explored as a solution to accommodate pet owners on their own sites. Therefore, the applicant shall provide an amenity for dogs on the private property. The size and features of this private amenity shall be appropriate for the expected number of dogs at this development.	Acknowledged. Dog amenity areas are provided on the site. Refer to 1/RZL1 (Landscape Plan)
86.	PFCS preference is land dedication vs. the provision of POPS. In accordance with the Parkland Dedication Bylaw, the proposed park block shall not be encumbered. This includes above ground and underground infrastructure, such as utility lines, swales, infiltration galleries, steep slopes, etc. These encumbrances significantly restrict the area that can be used for park amenities and therefore they will not be accepted. Where encumbrance is unavoidable, for the provision of POPS to be considered for acceptance, the proposed POPS shall comply with all requirements for land dedication, including the requirements for one piece (not multiple smaller pieces), shape, location, requirement to complete a parks needs assessment, requirement for the provision of active and passive amenities (as per the assessment), etc., as described above.	Resubmission No. 2 no longer proposes a POPS as an alternative to municipal parkland dedication. A formal municipal park block is now proposed at the north end of 170 Columbia Street West in accordance with PFCS's preferred location. The park block is intended to function as dedicated municipal parkland and has been separated from the private Common Outdoor Areas and resident amenity spaces provided elsewhere within the development. Detailed grading, servicing, utility and other design matters will continue to be coordinated with PFCS and the City's technical staff to ensure the lands proposed for dedication are suitable for their intended municipal park function and appropriately address the City's requirements respecting encumbrances.
PART K - ECONOMIC DEVELOPMENT		
87.	Previous comments are applicable.	Acknowledged.
PART L - PUBLIC COMMENTS		
88.	Staff have received mixed comments from members of the public regarding the Applications and the proposed development. In general, their comments relate to the following themes: ● Density ● Height ● Location	Acknowledged.

	• Family units (i.e. 3-4 bedrooms)	
PART M - EXTERNAL AGENCY COMMENTS		
89.	Comments from the following agencies have been received and are appended to this letter: • **Enova Power** • **Region of Waterloo** • **Waterloo Catholic District School Board** • **Peer Review – Land Use Compatibility** • **Peer Review - Noise**	Acknowledged.
90.	The following comments continue to be applicable: • **Canada Post** • **Six Nations**	Acknowledged.
PART N - ENOVA POWER		
91.		-

92.	The City of Waterloo has expressed the limitations for infrastructure in the right of way due to congestion. Enova will not be able to loop the two vistas within the right of way, and will require the Duct bank to come across the drive entrance.	Acknowledged. The location and design of the proposed electrical vaults and switchgear remain under coordination for the Site Plan Application stage. 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 and will be addressed during the Site Plan Application stage.
93.	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 St and will be addressed during the Site Plan Application stage.
94.	Phase 4 and 5 do not show padmount transformers with free space into the parking garage, will these be vault rooms?	Please refer to drawing A103 in the architectural package. 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. Sufficient clearance is provided and coordination will be refined in further Site Plan Application stages.
PART O - REGION OF WATERLOO		
95.	The Region is in the process of updating its Water Supply Strategy. Through this work, concerns have been identified regarding water servicing capacity within the Mannheim Service Area. Regional staff are working expeditiously to evaluate the situation and	Acknowledged.

	understand the magnitude of the concerns to be able to provide comments relating to water servicing capacity. As such, the Region is not in a position to support approval of this application at this time, and the following comments are provided for information purposes.	
Water Services		
96.	Regional staff have reviewed the 'Functional Servicing and Stormwater Management Report IN8 Developments Inc., 170 & 180 Columbia Street West, Waterloo, Ontario' prepared by Walter Fedy (January 23, 2026) including fire flow and provide the following comments.	Acknowledged.
97.	In conformance with the DGSSMS Section B.2.12.3 Number of Services per Property, a testable backflow preventer in Part B Design Guidelines B-22 accordance with CAN/CSA-B64-10 shall be installed on each service to eliminate the possibility of system flow through private property.	Acknowledged.
98.	The Region does not required the FSR to be resubmitted.	Acknowledged.
Hydrology and Water Programs		
99.	The Region requires that a prohibition on geothermal wells, including vertical open-loop, vertical closed-loop, and horizontal closed-loop geothermal energy systems be included in the zoning for this property.	Acknowledged.
Grand River Transit		
100.	The site is well served by multiple GRT routes serving stops at the Columbia/Phillip intersection, as well as at University of Waterloo ION Station which is within 800 metres of the subject site. As the site is well connected to nearby stops with transit amenities, there are no transit infrastructure requirements as part of this development application.	Acknowledged.
Environmental Noise and Rail Vibration		
101.	Regional staff have reviewed the updated noise report titled 170 Columbia Waterloo Incorporated – Transportation Noise and Vibration Assessment, 170–180 Columbia Street West, Waterloo, Ontario, dated February 2026 and prepared by Dillon Consulting, and offer the following comments regarding rail noise.	Acknowledged.

102.	The report identifies transportation noise impacts from City roads, Columbia Street West and Phillip Street as well as rail noise impacts from the Region of Waterloo Spur Line. Regional requirements are regarding rail noise impacts from the Waterloo Spur Line only.	Acknowledged.
103.	Rail vibration measurements were completed and were below the 0.14mm/s criteria. No mitigation for vibration from the Waterloo Spur Line is required.	Acknowledged.
104.	The report indicates that the acoustical impacts from the Waterloo Spur Line are above acceptable levels and mitigation, including central air conditioning, the provision for air conditioning, brick veneer or acoustical equivalent façade construction for specific phases as well as upgraded window glazing and noise warning clauses are required to ensure indoor noise levels do not exceed acceptable levels noted in NPC-300 and NPC-216. The location, installation and sound ratings of future air conditioning devices is required to comply with NPC-300.	Acknowledged.
105.	The report indicates that transportation noise levels in the Outdoor Living Area (OLA) exceeds the MECP limits. As such, noise mitigation measures are required. It is recommended that 1.5-metre-high acoustic barriers be installed around the south terrace outdoor living area of Phase 3 podium. As the site design advances and detailed ground elevation contours become available, the height and placement of the proposed acoustic barriers are required to be reviewed by a qualified Acoustical Consultant, and the analysis updated as necessary.	Acknowledged.
106.	The noise barrier should be constructed by the developer on private property and the ownership and maintenance responsibilities retained by the property owner.	Acknowledged.
107.	The noise barrier is to be installed with a minimum density of 20 kg/m^2, with no holes or gaps within or below the barrier and prior to occupancy of the adjacent lots. The barrier should be inspected to ensure that no gaps or holes are present.	Acknowledged.
108.	The report notes several noise mitigation requirements for the proposed development: ● A Type A warning clause is required at terrace amenity areas in Phases 1–5.	Acknowledged.

	• A Type C warning clause, with provisions for the future installation of central air conditioning, is required at various façade locations across Phases 1–5. • Most dwellings will require the installation of central air conditioning and a Type D warning clause, specifically required at the west façades of Phases 3, 4, and 5.	
109.	The report further notes that windows should be carefully selected to ensure the entire assembly, both frame and glazing, meets the specified minimum STC ratings. As the design progresses, the Region requires that the façade and glazing requirements be reviewed by an Acoustical Consultant to confirm that the recommended STC ratings are achieved.	Acknowledged.
110.	The report states that most building façades can be constructed using standard Ontario Building Code wall assemblies. However, brick veneer or an acoustical equivalent façade construction for Phases 3 & 4 west façades and the Phase 5 north and west façades.	Acknowledged.
111.	Minimum glazing requirements range from STC 29–33 for living and dining areas and STC 28–33 for sleeping quarters, depending on building orientation. Upgraded glazing will be required for Phases 3, 4 and 5 on the north, south and west facades.	Acknowledged.
112.	Since the rail noise source, Waterloo Spur, is under the jurisdiction of the Region of Waterloo, an agreement with the Region of Waterloo to implement the recommendations of the noise study will be required through a future consent or condominium application.	Acknowledged.
113.	The report recommends the following noise warning clauses be registered on title for the dwelling units. The owner will be required to enter into an agreement with the Region of Waterloo as condition of a future consent or plan of condominium application, and that the following clauses be included in agreements of Offers of Purchase and Sale, lease/rental agreements and condominium declarations.	Acknowledged.
114.	A Type A warning clause will be required for the following Phases: • Phase 1- South terrace • Phase 2 - West terrace • Phase 3 - East terrace • Phase 4 - South terrace • Phase 5 - North terrace.	Acknowledged.
115.	Type A	Acknowledged.

	Purchasers/tenants are advised that sound levels due to increasing road traffic may occasionally interfere with some activities of the dwelling occupants as the sound levels exceed the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks.	
116.	A Type C warning clause will be required for the following phases: ● Phase 1 – East, South, and West façades ● Phase 2 – North and West façades ● Phase 3 – North, East, and South façades ● Phase 4 – North and South façades ● Phase 5 – North and South façades	Acknowledged.
117.	Type C This dwelling unit has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound limits of the Municipality and the Ministry of the Environment.	Acknowledged.
118.	A Type D warning clause will be required for: ● Phase 3– West façade ● Phase 4 – West façade ● Phase 5 – West façade	Acknowledged.
119.	Type D This dwelling unit has been supplied with a central air conditioning system with will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of the Environment, Conservation and Parks.	Acknowledged.
120.	A Waterloo Central Railway Warning Clause and a Noise Barrier Clause will be required for: ● All Dwellings	Acknowledged.
121.	Waterloo Central Railway Warning Clause Waterloo Spur or its assigns or successors in interest has/have rights-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of	Acknowledged.

	the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s).	
122.	Waterloo Spur will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over, or under the aforesaid rights-of-way.	Acknowledged.
123.	Noise Barrier Clause The Developer agrees to preserve the function of and to maintain the privately-owned acoustic barrier located upon the lands. The purpose of the barrier is to attenuate noise from the Waterloo Spur Line and Columbia Street West. The Developer agrees that the Region, through its employees and agents has the right to enter onto the lands to inspect the acoustic barrier. The Developer agrees to repair or, if necessary, replace the privately-owned acoustic barrier. Should the Developer fail to repair or replace the barrier upon receipt of a written notice from the Region, as the Region deems necessary, the Developer agrees that the Region may, in its sole discretion, undertake such work upon the expiration of the time set out in the notice. If such work is undertaken by the Region, the Developer hereby agrees to permit entry upon the lands for this purpose and agrees to reimburse the Region fully for all costs of undertaking such work.	Acknowledged.
124.	Prior to the issuance of any building permits, the City of Waterloo's Building Inspector or a Professional Engineer qualified to perform acoustical engineer services in the Province of Ontario should certify that the noise control measures have been properly incorporated, installed, and constructed.	Acknowledged.
Transportation Impact Study		
125.	Regional staff have reviewed the 'Response Letter to Transportation Impact Study Proposed Redevelopment 170-180 Columbia Street West City of Waterloo, Region of Waterloo' (GHD, January 22, 2026) provided by the in response to comments offered by the Region and the City of Waterloo in October 2025. Specifically, to the Region's transportation interests, this response addresses our August 2025 comment regarding our non-support for a signalized intersection at Columbia Street West / Access 2.	Acknowledged. Refer to Response Letter to Transportation Impact Study (TIS) prepared by GHD dated August 6, 2026. The updated traffic analysis assumes a STOP-controlled, right-in/right-out at Columbia Street / Access 2.

126.	Update analysis and resubmit the Trip Generation / Distribution. Trip generation was done in an unsatisfactory manner because the consultant used "General Urban/Suburban" setting. The setting is closer to "Dense Multi-Use Urban", but more importantly, the trip generation rate used by the consultant was only supported by three studies in ITE and users are advised to use with caution. Use of Dense Multi-Use Urban results in more realistic trip rates supported by more studies. ● ITE enables an assessment of person-trips, which would then enable a comparison to vehicle-trips to determine a rough mode share. Using the rates recommended above, AM peak hour exiting person-trips are estimated as 1,251-1,287, and exiting vehicle-trips as 404-496. Auto occupancy during the peak hour is typically about 1.1, meaning that exiting person-trips by vehicles would be about 444-546. The vehicle mode share range is about 34%-44%. ● The consultant estimated a vehicle trip rate of 35% based on a comparison of ITE trip generation to ITE parking, and the ratio of proposed parking to ITE estimated parking. While this ended up in a similar rate to the assessment above, it's unclear if the consultant's methodology is justifiable. On the other hand, the range resulting from the work in the above bullet is generated entirely from ITE trip generation. In conclusion, I recommend the consultant review a conservative upper limit of 45% vehicle trips out in the AM peak hour to determine whether vehicle transportation recommendations are acceptable. A similar exercise should be done to determine AM peak hour vehicle-trips in and PM peak hour vehicle-trips in/out. Transportation Planning (Manager = Geoff Keyworth, Reviewer = Chris Clary-Lemon)	It is not reasonable to expect more vehicles to exit (or enter) the development site than there are parking spaces (and vehicles) during the peak hour. Not all residents with vehicles in their provided spaces leave (or arrive) within the same peak hour. Therefore, the AM and PM peak hour vehicle trip generation is expected to be less in number than the number of available parking spaces. Refer to **Section 4** of the GHD August 2026 TIS Response Letter, **Table 4** of the GHD August 2026 TIS Response Letter for the details of the trip generation. The subject development is expected to generate a total of 47 inbound and 179 outbound automobile trips during AM peak hour, and 132 inbound and 79 outbound automobile trips during PM peak hour, as shown in **Table 4** of the GHD August 2026 TIS Response Letter. Trip generation is also related to the number of parking spaces, as the vehicles enter and exit the development.
127.	FYI to City for the Active Transportation Accommodation. The north side sidewalk on Columbia Street leading to the signalized crossing of the Laurel Trail is substandard width and unlikely to be a comfortable walking environment for the many students likely to be going to UW. To encourage students to use the Laurel Trail signalized crossing, the City should consider how to improve this walking facility. If frontage improvements are appropriate, the City might consider using this tool to secure the investment from the developer. While a similar comment applies to the sidewalk leading to the Phillip Street signalized intersection, there may be less opportunity to address this.	Acknowledged.
128.	There are no concerns for the Accesses and Intersections.	Acknowledged.

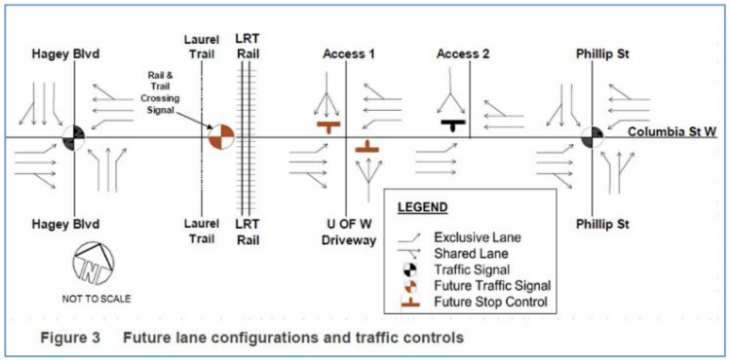
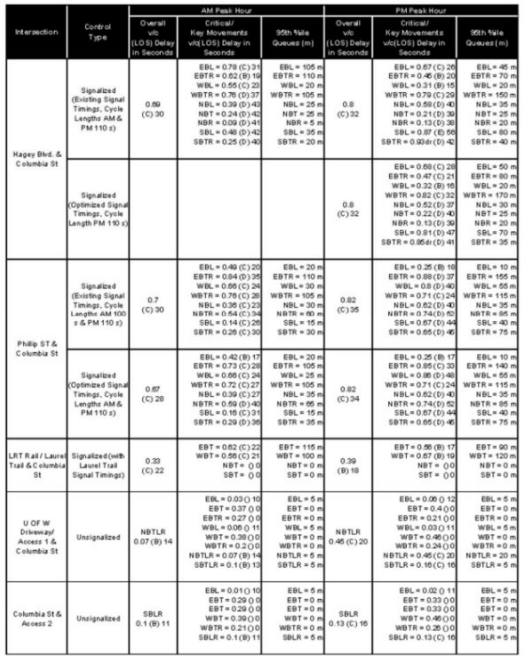
	The original TIS included a signalized intersection at Columbia Street West and Access 2. This intersection has been revised in the Update to a stop control intersection (free flow on Columbia Street West).  Figure 3 Future lane configurations and traffic controls	
129.	There are no comments for the Sight Lines / SSD / ISD.	Acknowledged.
130.	There are no comments for the Internal Site Circulation.	Acknowledged.
131.	There are no concerns with updated traffic operations analysis for the Impacts of Traffic Operations / Queues. The Update presents 2032 Total traffic conditions in Table 6 with acceptable Level of Service for Access 2 (unsignalized) – LOS C.	Acknowledged.

	Table 6 Total 2032 traffic conditions  Queuing analysis was also presented – no comments.	
132.	There are no comments for the Capital Program – Transportation Projects.	Acknowledged.
133.	There are no other comments.	Acknowledged.
Waste Management		
134.	The Region of Waterloo does not service stacked residential properties with more than 6 units. This site would not be eligible for the Region of Waterloo Residential Curbside Waste Collection Program. The owner/applicant is required to obtain private 3rd party waste removal services at the owner's expense. Additionally, the Region of Waterloo is no longer responsible for the collection of recyclable material. The owner/applicant can contact the current program administrator, Miller Waste Systems, regarding any plan for a separate recycling collection scheme at	Acknowledged.

	this property. Miller Waste can be contacted directly at area22@millerwaste.ca 1-888-852-3450	
135.	Site Plan Requirements Regional staff offer the following advisory comments in anticipation of future site plan applications. ● Salt Management Plan ● Stormwater Management and Site Grading ● Region of Waterloo International Airport ● Transportation and Demand Management	Acknowledged.
136.	Salt Management Plan The Salt Management Plan submitted as part of the Functional Servicing and Stormwater Management Report (WalterFedy, January 23, 2026) is acceptable. The Region will require the implementation of the Salt Management Plan as a condition of a future consent or plan of condominium application. The owner/applicant is advised that the Region does not support permanent dewatering controls (passive or active) on or adjacent to contaminated sites. Waterproof seals should be used in lieu of permanent dewatering controls for below-grade infrastructure requiring dry conditions (i.e. foundations, slabs, parking garages, footings piles, elevator shafts, etc).	Acknowledged.
137.	Stormwater Management & Site Grading The Region's review of 'Functional Servicing & Stormwater Management Report for 170 and 180 Columbia Street West, Waterloo, Ontario' prepared by IN8 Development (April 18, 2025) were provided to WalterFedy on January 13, 2026. These comments are provided below for reference as well. Regional staff have reviewed the report title Functional Servicing & Stormwater Management, IN8 Developments Inc, 170 & 180 Columbia Street West, Waterloo, ON, including Grading Plans (C201) and Servicing Plan (C301) dated April 18, 2025 prepared by WalterFedy and have found the plans and report satisfactory. For the purposes of the planning approvals associated with this development application, Corridor Development deems this matter concluded.	Acknowledged.

138.	Staff provide the following comments which should be reflected in the detailed servicing plans submitted with the future Site Plan application. This will not affect the Official Plan and Zoning By-law Amendment application but will be required with the future Site Plan application. ● Change 'Water Central Rail to Waterloo Spur/LRT corridor' throughout; ● City of Waterloo to review/approve all works along/within Columbia Street West Road allowance; ● Check/confirm/verify all locations, sizes and materials of existing infrastructure within Regional road allowance; ● It is understood that there are currently no tree removals required on Regional property that would require replanting. Should there be any changes in this regard, please notify and coordinate with the Supervisor, Forestry & Horticulture Operations, Brydon Rayner, at Brayner@regionofwterloo.ca. 1. The minimum setback distance between the railway property and any building constructed on an adjacent property is fifteen (15) metres along the Waterloo and Huron Spur; 2. No drainage shall be permitted onto the Regional rail corridor. All site drainage is to be captured and redirected to property location away from the rail corridor; 3. A condition of site plan approval for any development along the rail corridor property will be that the owner install, (not maintain), at its expense, a chain link fence at least 1.83 metres in height, at 0.15 m (6") onto the rail property, along the length of the mutual property line. The chain link fence is not allowed to have any type of gate to the rail corridor; 4. Prior to issuance of a building permit, the Region of Waterloo shall require a grading plan, drainage plan and storm water management report which is subject to the approval of both the Region of Waterloo and Canadian National Railway; 5. The Region of Waterloo recommends that a safety berm be constructed to a height of two (2) metres above rail elevation. If the applicant chooses not to construct a berm or any other recommendations other than a fence, it is at their discretion and they will be accepting all associated risks and liabilities in proceeding without implementing the recommendations, both now and in the future of the rail right-of-way; 6. There shall be no deep and/or shallow utility services permitted from or to the development from the rail corridor; and	Acknowledged.

	7. Please note a Regional Rai Permit is required for any works within the Region-owned rail right-of-way and is to be obtained through Regional Corridor Management in advance.	
139.	Any new servicing connections(s), modifications to existing servicing, modifications to previously approved servicing plans or removal of existing services would require Regional approval through a separate process of Municipal Consent. Municipal Consent must be provided prior to any works commencing within the Regional right-of-way. For Servicing approval the applicant will be required to submit through the Region of Waterloo website (https://rmow.permitcentral.ca/).	Acknowledged.
140.	Prior approval must be obtained from the Region of Waterloo by anyone planning to work on or adjacent to a Regional road. A work permit is required for anyone wanting to occupy a Regional road, shoulder, sidewalk or right-of-way, even if the work is not expected to damage the road. The permit must be obtained in advance of the work being done via the Region of Waterloo website (https://rmow.permitcentral.ca/).	Acknowledged.
141.	Regional Airport The development is located within the proposed Airport Zoning Regulations with an allowable height of 1800ft (548m) ASL. The drawings indicated a maximum 35-storey building elevation of 453.86 ASL plus privacy screen. There is about 90m of height available above the building for any cranes, which is expected to be sufficient. The developer will need to submit a Land Use application to Nav Canada for the buildings and cranes and obtain a letter of no objections to the satisfaction of the Region. The developer is encouraged to submit this as soon as possible to ensure there are no impacts for the proposal. The Region will require a letter of no objection prior to Site Plan approval. The developer will also need to submit an Aeronautical Assessment Form to Transport Canada and comply with all requirements.	Acknowledged.
142.	Site Plan Fee: A Site Plan pre -consultation fee of $300 and a Site Plan review fee of $805 will be required for the review and approval of a future Site Plan application.	Acknowledged.
143.	Regional Fees In accordance with the Region's Fee and Charges By-law (24-052), the Region has received:	Acknowledged.

	● the Regional review fee of $3,000 for Z-25-14 and OPA 66; and ● the Regional review fee of $3,000 for Z-25-15 and OPA 67.	
144.	Any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charges By-law 19-037 or any successor thereof.	Acknowledged.
PART P - WATERLOO CATHOLIC DISTRICT SCHOOL BOARD		
145.	The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comment(s)/condition(s): a) That any Education Development Charges shall be collected prior to the issuance of a building permit(s). b) That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/). c) That the developer shall include the following wording in the site plan agreement to advise all purchasers of residential units and/or renters of the same: "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assign or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."	Acknowledged.
PART Q - PEER REVIEW – LAND USE COMPATIBILITY & STATIONARY NOISE		
146.	The City of Waterloo has retained RWDI to conduct a peer review of the land use compatibility report for the proposed development located at 170-180 Columbia Street West in Waterloo, Ontario. The review considered the following report: 1) Land Use Compatibility Assessment 170 and 180 Columbia Street West, Waterloo, Ontario; prepared by Dillon Consulting dated February 2026.	Acknowledged.

	This review reflects best practices for land-use planning, and guidelines and policies mandated by the City of Waterloo (the City) and where applicable the Province of Ontario.	
Land Use Compatibility Assessment		
147.	*Section 3.1 - An updated conclusion should be provided that discusses the proposed development in the City of Waterloo on lands currently zoned for employment uses (E2A).* Addressed. The second submission addresses the zoning by-law amendment which updated the zoning for the subject lands from employment uses (E2A) to Station Area Mixed Use (SAMU-105).	Acknowledged.
148.	*In Section 4.1.3, please check the reference to Table 4 and update if necessary. Context suggests it should be Table 3.* Addressed.	Acknowledged.
149.	*Section 4.1.3 - There is a tall stack (approximately 55 metres above grade) associated with University of Waterloo District Heating located at the Central Services Building, approximately 300 metres south-southeast of the proposed development. Although this is an institutional source of combustion emissions rather than an industrial source, NOx emissions from this source may impact elevated receptors at the proposed development. Please include discussion of this source and its potential impact on elevated receptors.* Partially addressed. Discussion of emissions from the Central Services Building boiler stack is provided in Section 6.3.5.2. Results of dispersion modelling are provided in Table 14. It is noted that the maximum POI at the proposed development occurs at the highest elevation of the Phase 3 Building, at 92% of the MECP POI limit. Source parameters and assumptions used in the modelling are based on correspondence with the University. These parameters and assumptions are described in text but are not quantified. Since the University's ability to comply with the NOx standards published by the MECP is dependent on this modelling result, it should be reviewed in full. Please provide the AERMOD input files used in modelling the impact of emissions from the CSB stack.	July 22, 2026: University of Waterloo Contact is Larry Roberton larry.roberton@uwaterloo.ca AERMOD input files used in modelling can be provided upon request.

	Please provide the agency / contact at the University of Waterloo that provided the technical information used to develop the emission scenario.	
150.	*The Columbia Data Vault data centre includes diesel-powered backup generators used as standby power sources, and we agree it is appropriate to confirm compliance with the MECP's Emergency Generator Checklist NOx screening level of 1,880 µg/m^3 for a 1/2-hour averaging period.* Addressed.	Acknowledged.
151.	*For clarity, please update the facility name that occurs in the last sentence of Section 6.3.3 from "Valley Blade" to "Columbia Data Vault".* Addressed.	Acknowledged.
152.	*Please discuss the sensitivity of the modelling results presented in Table 14 to different stack flow rates and exhaust temperatures, and the elevations at which the impacts are expected to be greatest.* Addressed. Source parameters and sensitivity analysis for multiple generator models is provided in Sections 6.3.3.2 and 6.3.3.3 and Tables 9 and 10.	Acknowledged.
153.	*Although it is reasonable to assume that a facility would only test one generator set at any one time, this is not guaranteed. Please discuss the potential impact if Columbia Data Vault tests more than one generator set at the same time, and any potential mitigation of these impacts.* Addressed. The results of the generator testing scenarios provided reinforce the provision of the original CofA that only one generator should be tested at any one time. Thank you for providing this analysis.	Acknowledged.
154.	*Please provide a comparison table for the dispersion modelling results showing the maximum predicted point of impingement (POI) concentrations for each contaminant included in Table 15 at the proposed development and the MECP grid of receptors, and the location (x, y, z) of the most impacted receptors. Since assumptions were made for some of the source parameters used in the modelling, such as stack flow rate and the modelling natural gas combustion equipment as a rooftop area source, please discuss the sensitivity of the results to changes in the assumed source parameters.*	Acknowledged.

	Addressed. Table 12 provides the requested comparison of maximum concentrations at MECP grid versus the proposed development. Sensitivity analysis for NOx from a combined stack is provided. Thank you.	
155.	*Please include figures showing the location of receptors and the location of the described sources in Tables 14 and 15 that were used in the air dispersion modelling assessments described in Sections 6.3.3 and 6.3.4.*\ Addressed in Figures 6, 7, 8. Thank you.	Acknowledged.
156.	*Please ensure details of all references are provided in the References section.* Addressed.	Acknowledged.
Summary		
157.	The land use compatibility assessment for 170 and 180 Columbia Street West in Waterloo, Ontario follows MECP guidance to assess compatibility of the proposed development with surrounding stationary noise, air quality, odour, and dust sources. Review of the stationary noise assessment has been completed in a separate report, Peer Review – Noise and Vibration, 170-180 Columbia St. W. Waterloo. This review considers the remaining sections of the Land Use Compatibility Assessment.	Acknowledged.
158.	Based on this review, additional information is requested regarding the source parameters and modelling assumptions for NOx emissions from the University of Waterloo CSB boiler stack to facilitate a more detailed assessment of the modelled impacts to ensure the existing University of Waterloo facility would remain in compliance following the introduction of elevated receptors at the proposed development.	Acknowledged.
PART R - PEER REVIEW – NOISE & VIBRATION		
159.	The City of Waterloo retained RWDI to conduct a peer review of the noise impact report for a proposed development located at 170-180 Columbia Street West in Waterloo, Ontario. The applicant is proposing five mixed use towers. Each tower is expected to consist of residential dwellings and ground floor office/retail space. The review considered the following reports:	Acknowledged.

	1) Transportation Noise and Vibration Assessment 170 and 180 Columbia Street West Waterloo, Ontario; prepared by Dillon Consulting dated February 2026. 2) Land Use Compatibility Assessment 170 and 180 Columbia Street West, Waterloo, Ontario; prepared by Dillon Consulting dated February 2026. RWDI Previously reviewed earlier versions of these reports, dated April 2025. The Transportation Noise and Vibration Assessment addresses impact from both roadway and railway sources. Stationary noise sources are evaluated separately and documented in Section 5 of the Land Use Compatibility Assessment report. This review does not cover the other sections of the Land Use Compatibility Assessment. This review reflects best practices for land-use planning, and guidelines and policies mandated by the City of Waterloo (the City) and where applicable the Province of Ontario. Where differences in guidance may exist, the City has provided direct guidance to this peer reviewer on their expectations which takes precedence. Comments requiring action by the applicant are highlighted throughout this document for ease of identification.	
Transportation Noise and Vibration Assessment		
160.	On-site measurements were conducted to assess ground-borne vibration resulting from light rail train pass-bys. The measurement location was approximately 2 meters from the rail right-of-way and included observations of six light rail transit (LRT) pass-bys. The recorded root mean square (RMS) particle velocity values were below the applicable regulatory limits. However, ground-borne vibration from LRT pass-bys does not represent the vibration levels generated by freight train pass-bys. Per Section 3.4.1. of the FCM/RAC Proximity Guidelines, the influence area for a spur line is 75m. As this is an active freight corridor, ground-borne vibration measurements during freight train operations must also be conducted. This comment was made previously and remains outstanding.	Please see updated report. See Section 2.4.2 Vibration Measurements for detailed freight train pass-by vibration measurement.
161.	The Consultant Declaration statement is present but not properly filled out in places and does not appear properly notarized as the signatures are on a separate page. As this is a legal document, it must be clear the signatures and notarization are attached to the declaration. It is recommended that the declaration document be notarized and resubmitted so it is clear these are one document.	Please see updated report. The Consultant Declaration statement document was notarized and appended to the report resubmitted.

162.	The owner declaration statement is missing and should be provided, as it is required for submission per Region of Waterloo guidelines.	Please see updated report. The owner declaration statement was appended to the report resubmitted.
163.	All other comments requiring action in our previous review and subsequent correspondence have been addressed.	Acknowledged.
Stationary Noise Sources Assessment		
164.	The stationary noise assessment was completed within the Land Use Compatibility Assessment report prepared by Dillon Consulting dated February 2026.	Acknowledged.
165.	The stationary source assessment does not include all sources with the potential to impact the proposed development. a. The University of Waterloo (UW) main campus site has been mentioned in the assessment, however only the stack and not the cooling equipment at the central services plant is mentioned. Due to the capacity of this cooling equipment, it is likely that it could pose a significant noise impact for buildings that have line-of-sight over the surrounding barriers. This facility should be considered as Class II industry. The classifications in Guideline D-6 apply to the collection of activities at a site and not to individual components (e.g., noise or air quality sources alone). The presence of the tall stack should highlight it as a significant source. The assessment should be updated to confirm that the introduction of the proposed development does not adversely impact the environmental permitting for UW. The publicly available permit documents for the university should be reviewed for these sources.	Addressed, please see updated report. See Table 3, Section 4.1.5 and Section 5.2 for details regarding the inclusion of University of Waterloo Central Services Building and associated equipment as a significant source of Class II industry in the assessment.
166.	b. The modelling considers the five UW East Campus buildings. These buildings are noted to include generators, particularly at 175 and 185 Columbia Street, which include an ECA. This ECA# 7519-8KNNNF for 185 Columbia Street indicates that these generators must be tested individually during daytime hours, and that they are required to comply with the limits in NPC-205. The CofA# 5617-6REQCM indicates 4 generators that require mitigation. These facilities should be contacted to confirm whether these generators are still in use and tested under these approvals, or if their generators now satisfy the requirements to be exempt from permitting. If they are still in use and above the sound levels required to be exempt, their sound levels should be assessed.	Addressed, please see updated report. See Table 3 and Section 5.2 for details regarding the inclusion of the standby generator set at the UW East Campus Buildings in the assessment.
167.	c. The University of Waterloo School of Optometry and Vision Science was mentioned and classified as a Class I facility. This is considered acceptable.	Acknowledged.

168.	d. The assessment does not identify all of the publicly available permit information from the MECP's Access Environment. Notably, information exists for the Ford RnD Centre regarding the emergency generators as well as for University of Waterloo buildings which may have been missed as they are typically associated with the university's main address at 200 University Avenue. This information should be reviewed to ensure it does not alter the assumptions in the assessment.	Please see updated report. See Table 3 for details.
169.	A global ground absorption value (G) of 0.3 was selected for this area and it is noted that with this value the predicted sound levels at the development are right at the limits for Class 4. A global value of less than 0.3 should be considered given that the area between the residential buildings and the dominant stationary sources is primarily acoustically hard surfaces (e.g., asphalt, G=0). Local area of ground absorption can be used to capture impacts from the green spaces near the University of Waterloo.	Addressed, please see updated report. See Section 5.4.1.2 Ground Absorption for discussion regarding global ground absorption coefficient value (G) used in the assessment. Typically, a global ground absorption coefficient of 0.50, representing a mixed of absorptive and reflective grounds between sources and receptors. A ground absorption coefficient of 0.30 is applied to areas with reflective ground (i.e., pavement, concrete, and parking lots) while a ground absorption coefficient of 0.0 is usually applied to reflective water surfaces (i.e., stormwater pond, runoff detention area).
170.	The report proposed that noise impacts from stationary sources surrounding the proposed development be assessed to Class 4 limits. Sufficient justification for the recommendation of Class 4 has not been provided. a. Discussion of required mitigation for compliance with Class 1 limits has not been included. The mitigation to Class 1 sound level limits is needed along with a technical and economic justification to consider it infeasible. The City requires this justification before petitions for a Class 4 designation will be considered. Please see the City Terms of Reference for further information. In particular, the NAPA Autopro shop results in sound levels at the Class 4 limit with a ground absorption of 0.3 which does not align with the reflective ground type (G=0) between it and the proposed buildings. The potential for mitigation of this source should be evaluated.	Addressed, please see updated report. See Tables 7 and 8, Section 5.4.1 and Section 5.4.1.3 for detailed discussion regarding the infeasibility of achieving Class 1 sound level limits with mitigation measures and justification of proposing Class 4 designation for the Proposed Development. See Response for #169 regarding the selection of global ground absorption coefficient value (G) used in the assessment.
171.	b. NPC-300 (Section B11) highly recommends communication with the stationary source owner and discussion of potential alternatives where mitigation is necessary. The City supports this direction of NPC 300 to ensure land use conflicts are minimized. This information should be included in the report.	Please see updated report.
172.	The Consultant Declaration statement is present but not properly filled out in places and does not appear properly notarized as the signatures are on a separate page. As this is a legal document, it must be clear the signatures and notarization are attached to the declaration. It is recommended that the declaration document be notarized and resubmitted so it is clear these are one document.	Please see updated report. The Consultant Declaration statement document was notarized and appended to the report resubmitted.

<table>
<tr><td>173.</td><td>The owner declaration statement is missing, which is required for submission per Region of Waterloo noise guidelines.</td><td>Please see updated report. The owner declaration statement was appended to the report resubmitted.</td></tr>
<tr><td>174.</td><td>All other comments requiring action in our previous review and subsequent correspondence have been addressed.</td><td>Acknowledged.</td></tr>
<tr><td colspan="2">Summary</td><td></td></tr>
<tr><td>175.</td><td>The noise and vibration assessments for 170 and 180 Columbia Street West in Waterloo, Ontario addresses impacts from road traffic, rail traffic, and stationary sources. The City of Waterloo requires assurance that the reported sound levels and associated impacts are both accurate and comprehensive.

Based on our review, we conclude that both the “Transportation Noise and Vibration Assessment” and the “Stationary Noise Assessment” require revisions to address the comments outlined in the review section. Implementing these updates may result in changes to the findings and conclusions presented in the reports. Based on the available information, feasibility of the development from a noise and vibration perspective must be considered questionable.</td><td>Acknowledged.</td></tr>
<tr><td colspan="2">PART S - MEMORANDUM - INTERNAL</td><td></td></tr>
<tr><td colspan="2">Preliminary Assessment of the Sanitary Capacity</td><td></td></tr>
<tr><td>176.</td><td>The Functional Servicing Report (Report) for the application notes that the proposed development will have a sanitary discharge of 41.46L/s. As per the provided Report, the proposed sanitary flow rates are as summarized in Table 1.

Table 1 – Sanitary Servicing anticipated maximum peak flow rates:
<table><tr><th>Source</th><th>Peak Flow (L/s)</th></tr><tr><td>Proposed Site</td><td>41.46</td></tr></table></td><td>Acknowledged. WalterFedy will include the memo in the FSR moving forward as well.</td></tr>
<tr><td colspan="2">2051 Modelling Scenario</td><td></td></tr>
<tr><td>177.</td><td>The future conditions PCSWMM sanitary sewer model includes loading rates that are projected to reflect 2051 conditions. The projected 2051 model estimated flows do not account for flows from the proposed development.</td><td>See response above.</td></tr>
</table>

	To be conservative, the flows resulting from the proposed development were added to the sanitary sewer model flows to determine the effects of the proposed development on the sanitary sewer system. The analysis was conducted for the wet weather modelling scenario as it is more conservative, using the Sanitary Hydraulic model developed for the 2024 Sanitary Master Plan update.	
Laurel Trunk System		
178.	The proposed flow of 41.46 L/s was accounted for in the MH CN22-2 flows, the closest downstream manhole. The 2051 projected 'post-development' modelling results indicate that the sanitary sewer on Columbia Street downstream of the proposed development appears to have available capacity under wet weather modelling scenarios, reaching a depth of 70 percent full.	See response above.
PART T - NEXT STEPS		
179.	Prior to the City being in a position to move forward with a Staff Report to Council for the associated Official Plan Amendment and Zone Change applications, comments contained in and attached to this letter must be addressed and responded to in writing, with supporting studies and/or plans provided. City staff are available to discuss these comments or can arrange meetings on specific topics, as Required.	Acknowledged.