

Waterloo Community Planning Permit System Second Draft Community Planning Permit By-law and Urban Design Guidelines
Summary of Public Comments, Submissions and Responses

NOTES:

- 1. Responses to the public and development industry engagement sessions were refined or additional information added where appropriate such as considering the findings from NBLC’s Financial and Market Analysis.
- 2. Response comments were generated prior to the decision to scope the Community Planning Permit System initiative boundary to the Erb Corridor located outside of the Uptown Protected Major Transit Station Areas.

ACRONYMNS:

- BPH = Bedrooms Per Hectare
- CPPS = Community Planning Permit System
- CPP = Community Planning Permit
- FSM = Facilities, Services and Matters
- IZ = Inclusionary Zoning
- Laurel/Clair SPA = Laurel/Clair Floodplain Special Policy Area
- OP = Official Plan
- OPA = Official Plan Amendment
- O.REG. = Ontario Regulation
- ZBL = Zoning By-law
- ZBA = Zoning By-law Amendment
- UDG = Urban Design Guidelines
- (P)MTSA = (Protected) Major Transit Station Area

#	Commenter	Area of Comments	Date	Comments	Response
1.	Public	General	05-23-2025	The HAF grant requires the City to issue 650 building permits by 2027 that are over and above the City's historical housing growth. What is the City's historical growth is being referenced.	The historical growth being referenced is 1,140 units per year which is based on 12 years of historical data (2011 to 2023). Historical data is based on building permits and is reconciled to the most recent census.
2.	Ryan Mounsey (Urban Insights)	General	07-07-2025	Concerns about 10-unit lack of exemption: undermining the legislative intent of providing housing reforms, implications to cost and permit fees.	The second draft By-law exempts detached buildings with up to four dwelling units from a permit. CPPS's ability to require site planning for developments with 10 or less units comes from O. Reg. 173/16 and a specific provision in O. Reg. 173/16, s.10(14), that says s.41 (Site Plan Control) of the Planning Act applies to an application for a CPP. Applying site planning to townhouse developments and apartments with five or more units will ensure that important matters are addressed such as site circulation, accessibility, lighting, road widenings among other matters.
3.	Ryan Mounsey (Urban Insights)	General	07-07-2025	Concerns about application to small-scale residential development. Provincial amendments to exempt residential projects of 10 units or fewer from site plan control not applied to CPPS. Will add time and administrative burden to projects that contribute to missing middle housing. Believe only a zoning review is necessary and if minor relief is required, it can be pursued through Committee of Adjustment.	See comment above.
4.	Ryan Mounsey (Urban Insights)	General	07-16-2025	If a regulation is not within the 10-20% variance threshold, does that mean all applications must go to Council? Removing the four tests from an application (e.g. 10 units or less or greater) will open it up to more subjective planning decisions and more time intensive if a Council and public meeting are required.	The Committee of Adjustment four tests are being enhanced by criteria established within the by-law as outlined in section 1B.6 as it is broader than simply minor variance.
5.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	Where is the process for a council meeting if exceeds 15-20% variance? What are the timelines involved? If you exceed variance, it will be class 3. With council decision and report how long will this take?	Council decision needs to happen within 45 days after an application has been deemed complete. If there is an amendment to the by-law (changing the precinct or adding a use) this is outside the process and is similar to a Zoning By-law Amendment and is not included in the 45 day timeline. The 45 day decision timeline is applicable regardless of the class of permit. Should Council not make a decision on a Class 3 Permit within the 45 day timeline, the applicant will have the right to appeal the application to the Ontario Land Tribunal for a non-decision.
6.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	Can you add a step associated with steps for Class 3 bump up for Council, I believe the decision timeline will be much longer if this requires a report to Council and should be reflected.	Refer to Figure 1 in the By-law.
7.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	The province has clearly said to exempt 10 units from site plan to fast track development... a CPPS would add more process for this type of development. Do other cities apply CPPS to 10 units or less? I/we believe this should be exempt.	Developments with 10 units or less are not exempt as CPPS is regulated under a different section of the Planning Act. While overlap and similarities exist between the two, a CPPS Permit is not the same as a Site Plan Application. CPPS is regulated under a different section of the Planning Act and requiring a CPPS for developments of 10 units or less does not contradict the Provincial Legislation exempting these developments from the Site Plan process. CPPS provides a streamlined decision timeline of 45 days compared to 60 days for Site Plan.
8.	Development Industry Session -	General	07-17-2025	The horizontal tower dimension variance should be the same (20%) as others as they are defined minor.	Comment noted.

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	Ryan Mounsey (Urban Insights)				
9.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	The math should be looked at closely – this could have a tremendous impact on project viability for smaller scale development. A criteria should be established for exemptions. A whole new IZ review is needed prior to implementing this policy/requirement which needs to be done before making a decision on the CPPS (or make this condition upon more evaluation). Projects must be viable.	The exemptions from having to obtain a CPPS permit are detailed in Section 1B.2 of the By-law. It should be noted that the development regulations within the Draft By-law were taken directly from the existing Zoning regulations. The CPPS provides shorter application decision timelines and more flexibility in varying development regulations based on site-specific conditions, both of which should improve project viability from what exists today.
10.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	If you exempt parking from Bill 185, why not exempt 10 units or less? I disagree Bill 23 exempted 10 units or less and should supersede. This is adding a process.	Bill 185 has amended the Planning Act to restrict the ability for a municipality to require vehicle parking within PMTSAs. This applies at the Official Plan level and to any land use by-laws that implement the Official Plan (i.e. Zoning By-law and CPP By-law). There have been no changes to Provincial legislation that restrict the ability for a municipality to require a CPP for developments under 10 units.
11.	Development Industry Session – Alex Vandersluis (Auburn Developments)	General	07-17-2025	The concept of this being a 45-day process is clearly not the case – the city needs to fix how this is being messaged/sold because there is no 45 day approval happening.	Comment noted around using language around a 45 day approval, it is noted it is 45 days to make a decision after an application has been deemed complete and not necessarily approval as a decision could be made to refuse the permit application. Appeal rights come into effect after the 45 day legislated timeline.
12.	Development Industry Session - Alex Vandersluis (Auburn Developments)	General	07-17-2025	There are several properties which have a 30 storey designation under OPA 58 that are outside of the Laurel/Clair SPA, and do not have the 105 metres suffix.	If there is a property, send it along. The second draft of the CPP By-law carries forward the existing zoning of properties, while implementing the council adopted modifications made to the Official Plan through OPA #58 (pending Ministry approval). There are a number of properties, particularly in the Uptown, that had lower zoning applied as part of the 2018 Comprehensive Zoning By-law Review to ensure appropriate height transitioning from high density areas to low density areas. These have been carried over into the by-law. The implementing Zoning By-law Amendment for Phase 2 of the Official Plan Review, which involves a comprehensive review of the City’s Nodes and Corridors framework as a whole including heights and densities, will examine these instances further.
13.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	A critical review of OLT decisions is needed to see what the new density is in Uptown. 900 bph seems low for current approvals. This should be (the OLT approved projects) the base line as all these projects are defined as good planning and would better support filling the new 30 storey heights. Most projects would be bumped to Class 3 for density if this is the case while complying with height.	The 900 bph is in line with the Council approved density for the Station Area Mixed-Use zone and has been carried over into this By-law. Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, Official Plan staff will be reviewing the City’s Nodes and Corridors framework as a whole which could potentially result in future changes.
14.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	Implication of Bill 17?	The second draft did not consider Bill 17 as the draft was already being finalized prior to Bill 17 receiving Royal Assent. Staff are reviewing Bill 17 for any implications prior to finalizing the Final By-law.
15.	Development Industry Session - Ryan Mounsey (Urban Insights)	General	07-17-2025	The review time should be 1 year to evaluate this process rather than the proposed 2 year review.	Comment noted.
16.	Development Industry Session - Alex Vandersluis	General	07-17-2025	The 45 day approval actually requires pre-submission consultation, a complete application and review/comment period by staff and agencies and clearing of conditions on an “approval” (off the clock)?	This is correct that the 45 day timeline is from the day a complete application is received until a decision is made.

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	(Auburn Developments)			Why has there not been a 1:1 implementation of OPA 58 “High Rise – 30 Storeys” properties to RMU2-105 in CPPS?	There has unless the property is in the Laurel/Clair Special Policy Area or had lower zoning applied to it through the 2018 Comprehensive Zoning By-law.
17.	Development Industry Session - Alex Vandersluis (Auburn Developments)	General	07-17-2025	Helpful to have list of municipalities with CPP system. Most municipalities using CPP historically have not been places that see 30 storey towers. Frustrated about the 45 day timeline and how it does not start until after comments are received. Does not like how the clock does not start until application is deemed complete. Thinks City is forcing additional requirements to Site Plan application. E.g., regulation of urban design, exterior design.	Mid-sized cities that have implemented CPPS include: Guelph (Stone Road and Edinburgh Strategic Growth Area), and Brampton (Main Street North). In addition, Burlington has received Provincial approval on the CPPS enabling policies and approval in principle on the CPP by-law for 3 MTSAs, while those in progress include: Waterloo, Guelph (downtown), Oakville (Midtown and Bronte Village), Barrie (urban growth centre), Peterborough (city wide); Brant County (County-wide); Caledon (Planned Bolton South GO MTSA); Ottawa (Kanata North Economic District). The City has been leveraging lessons learned from those processes. Trying to make the development approval process more streamlined. Provincial reforms have not impacted O. Reg. 173/16 and its site planning and urban design abilities. Intent is to create development that looks good with proper planning.
18.	Development Industry Session - Alex Vandersluis (Auburn Developments)	General	07-17-2025	12.(1) of O. Reg. 173/16 – if the council fails to make a decision under subsection 10(9) within 45 days after the date on which the material and fee are received as described in subsection 10(5) or (8), the applicant may appeal to the OLT on failure to make a decision?	Correct, appeal rights are granted after 45 days if no decision is made.
19.	Development Industry Session - UP Consulting	General	07-17-2025	I question the benefit of notice requirement update for class 2. Given that this is a staff approval, with clear maximum thresholds of relief, I wonder if providing notice at this stage is disingenuous to the general public/neighbours and/or inviting pushback which seems contrary to the objective of the initiative.	The decision to provide notification for Class 2 Permits was based on feedback received during community engagement, and is a similar approach taken by other municipalities that have implemented a CPPS. While there is no public meeting, similar to Committee of Adjustment applications, members of the public can still provide Planning Staff with comments while they consider the application.
20.	Development Industry Session - Reema Masri (Masri O Architects)	General	07-17-2025	Density for 30 storey towers of 900 seems very low. Questioning the need for density as a controlling element of high rises. Why does City care about number of bedrooms? City of Kitchener has zoning compliance certificate which simplifies requirements. The 900 bedrooms will not fill the 30 storey high tower.	The 900 bph is in line with the Council approved density for the Station Area Mixed-Use zone and has been carried over into this By-law. Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, staff will be reviewing the City’s Nodes and Corridors framework as a whole which could potentially result in future changes.
21.	Development Industry Session - Larry Kotseff (Solo)wave)	General	07-17-2025	Would existing exemption from Zoning By-law be moved to CPP By-law? By moving these over are they appealable in the CPP By-law?	Exemptions in the CPP By-law are outlined in section 1B.2, if you propose something that is exempt or is compliant you do not need a CPP By-law permit. For example, a detached dwelling that complies with all applicable development regulations of the precinct can go directly to a building permit application. Existing Site-Specific zoning regulations have been carried over from the Zoning By-law. The CPP By-law is appealable.
22.	Development Industry Session - Larry Kotseff (solo)wave)	General	07-17-2025	Affordable housing is limited to MTSAs, does this conflict with provincial legislation? Facilities, services, and matters is in an older O.Reg.	Facilities, services, and matters (FSM) are not Inclusionary Zoning. FSM is a benefit provided by a developer in exchange for additional height or density. This can include affordable housing.
23.	Development Industry Session - Larry Kotseff (Solo)wave)	General	07-17-2025	Are there more details in CPP Table of Contents than the Zoning By-law?	The Zoning By-law and CPP By-law are similar. The CPP By-law has sections related to the process which is different, but other than that follows the structure of the Zoning By-law.
24.	Development Industry Session – Jessi McLellan (GSP)	General	07-17-2025	For Site Plan we have submission deadlines and comment circulation deadlines, would it alleviate the 45 day concern by introducing that into the CPPS?	We will take this into consideration.

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25.	Public in-person session	General	07-22-2025	Concerned that public has no input and developers can do whatever they want.	Any amendment to the CPP By-law requires a statutory public meeting, similar to a zoning by-law amendment. Both Class 2 and 3 Permits include public notification requirements. Members of the public may provide comments for the decision authority (Staff for Class 2 and City Council for Class 3) to consider prior to making their decision.
26.	Public in-person session	General	07-17-2025	What if there's multiple by-law relief issues e.g. project on Erb St between Peppler and Roosevelt (asking for 14 different Zoning By-law reliefs). Will that be considered as a Class 2 or Class 3 permit?	If an application is requesting relief from multiple regulations of the By-law, if all of the requests are within the Class 2 threshold, the application would be considered a Class 2 Permit application. If any of the requests exceed the Class 2 threshold, then the permit would be considered a Class 3.
27.	Public in-person session	General	07-22-2025	Can you speak more specifically about the urban design guidelines?	It is a requirement to consider how a CPP application helps fulfill the intent of the guidelines. The Guidelines consider the variety of sites. One difference between the current process and a CPPS is that the CPPS can provide a single comprehensive decision on a development application. In addition, where an applicant is seeking relief from a standard within the by-law (variation), the by-law establishes criteria for considering a variation which include "the proposal is consistent with the intent of any applicable urban design policies, standards and guidelines", see CPP By-law provision 1B.6.1.d). These Guidelines will form part of the City-wide Urban Design Manual and are intended to expand on the Manual's general design direction for all Nodes and Corridors across the City.
28.	Public in-person session	General	07-17-2025	At what stage of the process will notice/sign go up?	Class 2 and 3 permits would be required to post signage on the property early in the process. There will be enough time to provide a response. The City's Engage page lists planning applications and will be modified to include CPP applications.
29.	Public in-person session	General	07-22-2025	Minor variations were previously dealt with by the Committee of Adjustment. Is the By-law going to remove power from the committee who conducts public meetings?	The CPP area is only for a portion of the City. Development within the CPP area would not go to the Committee of Adjustment for a decision unless it is a consent application.
30.	Public in-person session	General	07-22-2025	You discussed how the high quality design and community benefits in urban design guidelines are recommended. Can the city just say we considered it? How is it enforceable?	The By-law places more reliance on guidelines for decision-making as it provides one application and approval for development, and where relief from a standard within the CPP By-law is sought, consistency with the urban design policies, standards and guidelines is required as outlined in the response to comment #27 above. These Guidelines will form part of the City-wide Urban Design Manual and are intended to expand on the Manual's general design direction for all Nodes and Corridors across the City.
31.	Public in-person session	General	07-22-2025	What does a complete submission look like? Does it incorporate all of the requirements from a ZBA submission as well as an SPA submission? Will the process be more onerous or less?	Complete submission requirements will differ from application to application, depending on its scale, scope, and complexity. Complete submission requirements will be determined during the Pre-Consultation process and will include everything required by the City and other approval bodies to make a decision.
32.	Public in-person session	General	07-22-2025	How can CPPS relate to emergency issues like climate change and extreme weather events? If there are new developments, will there be provisions that require more greenery or more trees to be planted? Will infrastructure be adjusted/studied so that when there's heavy rain, the drainage system can handle that amount of water?	As part of the variation criteria, one of the items that will be looked at is whether the request is meeting the intent of plans, studies and master plans including any climate adaptation plans. The City is currently doing an Urban Design Manual refresh and climate considerations will be considered.
33.	Public in-person session	General	07-22-2025	If Waterloo were to develop high performance development standard after this By-law passes, will they have any impact on it?	The City is developing High-Performance Development Standards (HPDS) with other Waterloo Region municipalities to improve the energy efficiency, climate resilience, and sustainability of new developments. More information can be found here engagewr.ca/high-performance-development-standards . Applications would need to conform to any Council approved policies, standards, and/or guidelines.
34.	Public in-person session	General	07-22-2025	20% variance allowed by staff on 650 beds/ha would be over 150 additional bedrooms. 150 additional bedrooms mean many smaller	In the second draft, for properties located outside the Laurel/Clair floodplain SPA, there is 10% Class 2 variation across the various precincts for density. Any requests to go above the

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				units. This is against the goal of the middle housing objective by limiting number of three bedrooms and concentrating on single bedrooms. 20% might be high for variances on maximum density. Concerned with staff being responsible for that magnitude of change where elected council may be better positioned to deal with the community on such a level.	10% variation, a Class 3 Permit would be required and would need to go to council for a decision.
35.	Public in-person session	General	07-22-2025	Do you anticipate any changes to the CPP regulation as a result of the change to the Planning Act under the Bill 17 regime? If yes, when do you expect it to surface and will it come before the deadline to produce the by-law?	The Province has not signaled any changes to O. Reg. 173/16 which provides regulation for CPPS.
36.	Public in-person session	General	07-22-2025	Are there any other Bill 17 changes to the Planning Act that may affect this process?	The second draft of the by-law was prepared prior to the Province enacting Bill 17. The Protecting Ontario by Building Faster and Smarter Act, 2025 (Bill 17) received royal assent on June 5, 2025. This resulted in changes to several pieces of legislation including the Planning Act. These changes did not have a direct impact on the ability to implement a Community Planning Permit System under the Planning Act (Section 70.2) nor did it result in changes to Ontario Regulation 173/16 Community Planning Permit Systems. This Act does limit the ability of municipalities to revise the list of potential supporting studies identified in their Official Plan that could be required as part of a complete application. This would have an impact on the ability of the City to change what is requested as part of the Community Planning Permit System. The City continues to monitor legislative changes.
37.	Public in-person session	General	07-22-2025	Is the CPP By-law being proposed appealable and if it is, who can appeal it? Can you define a third party in third party appeal? People who have an interest do not have appeal rights on a particular CPP application?	During the initial establishment of the By-law, the applicant, the Minister, certain public bodies, and registered owners or specified individuals who participated in the public input process can appeal. Once in effect, only the applicant has appeal rights on a subject application. It is correct that people who have interest do not have appeal rights. This is consistent with the site plan and minor variance process currently.
38.	Public in-person session	General	07-22-2025	Within the study area, do we have an estimate as to how much it will increase the population? I don't see one single green space or park being added. I was wondering why not and why the city cannot reserve space for green open space here?	The densities provided in the second draft of the CPP By-law are consistent with the densities already permitted under the existing Zoning and Official Plan policies. Parks and greenspaces are identified in the City's OP and the CPP By-law has carried over the provisions. Any green or open space that is currently reflected and that the City owns has been carried over. In terms of the CPP By-law, as development applications come in, we do take parkland dedication. That goes into a fund which is used to purchase, reurbanize or expand parkland in accordance with the City's Parkland Strategy which takes time.
39.	Public in-person session	General	07-22-2025	Specifically, within the study area there are no plans to expropriate any lands for parkland?	There are ongoing conversations, not just on Erb Street, but around the ward about parkland. We look at the population and the parkland that is available and what the needs are. We do have a Parkland Strategy which outlines parkland/greenspace needs.
40.	Public in-person session	General	07-22-2025	Looking at the Erb Street corridor, transit right now exists but it is not anyone's first choice. Is there anything in motion right now to change that as developments start to go in?	There are a number of projects and processes that will be looking to evolve and improve the situation, not just in this area, but citywide to facilitate greater movement and connections. Grand River Transit (GRT) is under the jurisdiction of the Region of Waterloo and its Business Plan provides a roadmap to guide future transit service expansion and investments over the next 10 years and beyond which can be found here: grt.ca/en/about-grt/grt-business-plan.aspx
41.	Public in-person session	General	07-22-2025	Concerned with the reduction of appeal processes. Community is shut out early in the process and developers have runway to negotiate/offset to get their projects confirmed. What assurances or safeguards are you building into the system to ensure that at a certain point a development application has to stop?	Suggest taking a look at the By-law, section 1B.6, which identifies the criteria that staff or council will evaluate in the event of a class 2 or 3 application. All applications regardless of applicant/developer will be reviewed against these criteria. This process will be transparent, and everyone will be able to see as well as residents in terms of what criteria we will be reviewing the applications on similar to the minor variance process with the four tests. With

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					the CPP By-law, we have expanded what we think is in the interest of the city. Also, the Director of Planning has an opportunity to bump an application up. It is noted that Committee of Adjustment Minor Variance and Site Plan applications do not have third party appeals.
42.	Public in-person session	General	07-22-2025	Once conditional approval is met, after the community has abated their connection with the process, does the developer have the opportunity to further engage in ways that the community does not?	Once a decision is made on a permit application, subject to conditions, there is no public process involved in the satisfying of conditions, similar to Site Plan. If provisional approval is provided (approval in principle subject to conditions), if one or more condition has not been cleared to the satisfaction of the City a Community Planning Permit shall not be issued. As per provision 1B.17.3 of the CPP by-law, changes to the design to address one or more condition may result in the need for a new circulation or new permit application. Once a Community Planning Permit is issued, it becomes applicable law and Building Permit application will need to match what was approved. There is room for minor modifications, but the applicant will not be able to make substantial design changes, or get additional relief from the development regulations without applying for additional approvals.
43.	Public in-person session	General	07-22-2025	If its conditional then there needs to be dialogue between the developer and city staff? Can community appeal too?	It is exactly like the current Committee of Adjustment minor variance process, where a decision is rendered but there may be conditions. The developer has to clear the conditions to the city's satisfaction. The community cannot appeal once the By-law is in effect, similar to the current minor variance process.
44.	Public in-person session	General	07-22-2025	Presentation mentions burden on city council. Does it seem like a lot of the approval barriers come from the fact that there is a queue in city council and that there's too much pressure on council or they do not meet enough/as often?	It depends on the nature of application, the variations and the magnitude. If an application meets all the criteria, it should progress smoothly. A challenge can be getting timely comments on behalf of certain agencies, such as provincial ministries like the Ministry of Transportation of Ontario (MTO). With this tool, there is an ability to issue approvals with conditions. A condition can be "subject to MTO signing off on this application." This is part of a broader change management exercise. Should Council approve the CPPS By-law, council reporting schedules and timelines will be worked on to align with the 45 day decision window.
45.	Public in-person session	General	07-22-2025	Will something in the By-law encourage people to act on the approvals they receive? There are a dozen of sites around Uptown Waterloo that have been sitting idle for years. Is there anything you can do to ask developer to speed up development?	Unfortunately, the City cannot force people with existing approvals to pull a building permit. However, a CPP By-law can include lapsing provisions for a permit which is something the City is considering for the final By-law.
46.	Public in-person session	General	07-22-2025	For Committee of Adjustment, one of the conditions is that a building permit is required within a year or two. Is it only the committee that puts in this condition of approval?	In the By-law it states that provisional approval lapses after a year noting there is an ability to request an extension to the Director of Planning. Consideration will be given to lapsing provisions for a Community Planning Permit.
47.	Public in-person session	General	07-22-2025	On the corridor map, there are a couple of areas that are blank which we know decisions have been made for. These things are addressed in the City plan. Is there a reason why the space between Dietz and University are simply left blank when we know development is key in those areas and have been discussed repeatedly by the city and council (e.g. the Carrick)?	The Carrick development is on the north-east side of Erb Street by Westmount Road. It is a multi-phase, multi-building development. It is located outside of the CPP area as it is in a Major Node. Everything outside the CPP area will continue to be regulated by the Zoning By-law.
48.	Public in-person session	General	07-22-2025	When is the deadline for comments on the CPP By-law?	We would like comments on the second draft by Friday, September 12 to help inform the final. We hope to bring a final CPP By-law and UDG to Council next year spring.
49.	Robert Barnett	Bauer Island (between Father David Bauer Dr, Erb & Westmount St)	07-22-2025	Parcel between King St and Fisher Hallman on the north side of Erb is not addressed in the CPP By-law, but it appeared in the Zoning By-law as RMU-40 and C1-40 on the east side of Westmount Road, and E1-60 on the west side facing Erb. Please amend the draft plan to include the current designation (or currently sought designations) for these properties.	These properties are not included in the CPP By-law area as they are within a Designated Major Node and not a Minor Corridor/Node.

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50.	Robert Barnett	General	07-22-2025	Flow chart on page 5 (Table 1A) and narrative 1B.12 does not make it clear when public meetings on applications are required and the notice of time period for public comment. Please clarify.	Table 1A identifies Class 3 requiring a Council decision which would necessitate a Council meeting. There are no legislated notice requirements for permits under a CPPS. It is up to individual municipalities to define detailed implementation including timing which is still under consideration by the City.
51.	Robert Barnett	General	07-22-2025	Criteria appear extremely vague and subjective. Can these considerations be made more objective in a way more easily recognizable by the public? Can the evaluation of criteria reflect a premium for inclusion of 3-bedroom units?	Several of the criteria are taken directly from the current Committee of Adjustment process, which have been in place for years, with some additional ones based on review of other CPP By-laws and engagement feedback. Section 1B.6.2 states that the City will prioritize the provision of a balanced mix of dwelling unit types (inclusive of 3+ bedroom units) when apply the variation criteria and evaluating proposed development. This is in response to engagement feedback received on the first drafts.
52.	Robert Barnett	General	07-22-2025	Cannot see Cash-in-lieu values in the table, 1B.15A or in the narrative 1B.15.10. Where are these cash values defined in the document?	The values were left blank in the second draft as the City retained a consultant, NBLC, to undertake an analysis of the inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located outside the Major Transit Station Areas in the CPPS boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
53.	Robert Barnett	General	07-22-2025	It was pleasing to see the requirement (Table 3C-2) for a minimum percentage of Gross Leasable Residential Floor Area to be provided for AFFORDABLE DWELLING UNITS. I note that for the Bauer Island the percentage is the highest level at 2%. It is also stated that the Affordable Dwelling Units must be maintained as such for 25 consecutive years (3I-g).	Table 3C-2 pertains to Inclusionary Zoning provisions as carried over from the existing Zoning By-law. Council approved the Inclusionary Zoning Official Plan Amendment and Zoning By-law Amendment in June 2024.
54.	Robert Barnett	General	07-22-2025	Zero parking for affordable dwelling units in 6.1.3 (Table 6A) is unrealistic. Suggest 0.35 parking/unit but if an amendment is made to lower the restriction, the parking should be 0.65/unit.	Table 6A pertains to Inclusionary Zoning provisions which were carried over from the existing Zoning By-law. Council approved the Inclusionary Zoning Official Plan and Zoning By-law Amendments in June 2024. Waterloo and Kitchener chose to exempt any Inclusionary Zoning affordable housing units from minimum parking requirements to increase project viability. It is noted that this is a minimum requirement. Applicants have the ability to provide more than the required minimum.
55.	Robert Barnett	General	07-22-2025	Rates for electric vehicles is significantly understated, particularly 50% of designated electrical spaces should be for visitor parking (6.3.1.3). Suggest a modest flat 3% of spaces above 20.	These regulations and rates were carried over from the existing Zoning By-law. Staff will consider your comments for potential future general amendments.
56.	Robert Barnett	General	07-22-2025	6.4 Accessible Parking: I assume that the number of accessible parking spaces identified on Table 6D as cumulative for Type A and B, i.e. assuming that average MUR1 -20 building, would have 6 accessible parking spaces. It would be appropriate to perhaps regulate how many of these should have the noted Accessible Parking Access Aisle (10%, 25%, 50%?).	Correct, the table indicates the number of Type A and Type B spaces that are required for a given number of total parking spaces. The full amount of Type A and Type B spaces are required to be provided. Parking Access Aisles are required for all Accessible Parking Spaces, regardless of type, noting that two spaces may share a single access aisle.
57.	Robert Barnett	General	07-22-2025	Unclear whether parking restrictions are inclusive or exclusive. Are the number of required parking spaces the total of unit parking spaces plus	Where the by-law defines a minimum number of required Parking Spaces for a given use, this number is the total minimum number of spaces that are required for that use. Parking

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				Affordable Parking Spaces Plus Electric Vehicle parking plus Accessible Parking or is the number base unit needs less these special designations?	requirements for different uses are cumulative (i.e. there may be a minimum parking rate for residential uses and another rate for commercial uses, these would be added together to provide the total required spaces). Regulations relating to accessible parking or Electric Vehicle (EV) parking define how many of the required parking spaces need to be provided as a specific type. For example, if 25 spaces are provided in total, at least one these is required to be an Accessible Space.
58.	Robert Barnett	General	07-22-2025	Limiting or strictly managing variations from the stated bedrooms/ha (density maximum) are critical.	Comment noted.
59.	Robert Barnett	General	07-22-2025	Suggest the City develop a strategy for community needs in housing.	In 2023, Council approved an Affordable Housing Strategy and earlier this year, the City undertook a Housing Needs Assessment .
60.	Robert Barnett	General	07-22-2025	Current draft By-law does not contemplate any RL designations (7.4) in the plan. Could a statement recognizing the value of RL properties outside of the Heritage Conservation Area be made?	The CPPS area is focused on two strategic growth areas of the City and not the City's residential low-rise areas located outside the CPP area. Section 7.4 Low-Density Residential (RL) is included as several of the precincts direct existing low rise uses to these standards.
61.	Robert Barnett	Erb Corridor	07-22-2025	C72 (213 Erb) – site noted for Spiritual Use (a mosque), yet no such designation is made for the Erb St Mennonite Church (131 Erb) nor the First Baptist Church (Erb 306). The site of the Mennonite Church is zoned MRU-20, and the Baptist Church is not zoned at all but is adjacent to C16 (Woodland Terrace – Seniors Apt) which is zoned MRU-20. Could the two Spiritual Sites be noted as Site Specific Precincts with defined terms and noted for Spiritual Use as defined by this document (pg 75).	Under the existing Zoning, Spiritual Use is permitted within the RMU-20 Zone. Since 213 Erb was zoned RMU-40, Site Specific Zoning was required to permit the use.
62.	Robert Barnett	Erb Corridor	07-22-2025	Could Dietz Ave N (6-14 Dietz) be designated MUR1-40 on the plan as this parcel has already been designated such and would be consistent with treatment of C164 and C82 which do not directly front onto Erb.	These properties are located outside of the CPP By-law noting they have been approved for redevelopment and are proceeding through the site plan process.
63.	Robert Barnett	Erb Corridor	07-22-2025	Could Waterloo Heights be designated as MUR1–30 (9 stories) and the residential units on Roslin St (West side) be recognized as currently zoned R4 or recognizing the reality perhaps as MUR1–20?	Waterloo Heights is outside of the CPP area as are the lots on Roslin Street North.
64.	T. and R. Nickels	Erb Corridor	07-25-2025	Erb St W Corridor - Is the City interested in purchasing any of those properties for development?	There are no property purchases being considered as part of this project.
65.	Public virtual session	General	08-07-2025	Question about how CPPS has been implemented elsewhere and learnings from other municipalities that we can benefit from?	Mid-sized cities that have implemented CPPS include: Guelph (Stone Road and Edinburgh Strategic Growth Area), and Brampton (Main Street North). In addition, Burlington has received Provincial approval on the CPPS enabling policies and approval in principle on the CPP by-law for 3 MTSAs, while those in progress include: Waterloo, Guelph (downtown), Oakville (Midtown and Bronte Village), Barrie (urban growth centre), Peterborough (city wide); Brant County (County-wide); Caledon (Planned Bolton South GO MTSA); Ottawa (Kanata North Economic District). The City has been leveraging lessons learned from those processes.
66.	Public virtual session	General	08-07-2025	Wanted to clarify that IZ isn't being applied twice through this process?	No it is not. The IZ provisions have been carried over into the CPP By-law and will apply to the Uptown Major Transit Station Areas within the CPPS boundary.
67.	Public virtual session	General	08-07-2025	Question about traffic analysis for development within the Erb St corridor - concerns about how difficult it is to cross Erb Street.	Traffic analysis is not part of the CPP By-law, rather it will be part of a complete application for a CPP permit.
68.	Mark Dorfman (Planner Inc)	General	08-13-2025	Suggestion to provide a plain text version of the CPP By-law as a guide for all users and observers.	Comments noted and the project team is planning to produce a “How to Read” booklet to assist people with the roll out of CPPS.
69.	Mark Dorfman (Planner Inc)	General	08-13-2025	CPP By-law does not contain any provisions regarding any proposed amendment to the By-law in compliance with section 17 of O. Reg. 173/16. The CPP By-law should clarify the procedures that apply to	Comment noted and will be reflected in the final by-law.

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				amend the CPP By-law "before the fifth anniversary of the day the by-law is passed."	
70.	Mark Dorfman (Planner Inc)	General	08-13-2025	Site Alteration is approved under the Environmental Protection Act, yet site alteration is included in the definition of "development." This distinction should be clarified here.	The definition of “development” that includes site alteration under a CPPS (O. Reg. 173/16) applies instead of the definition of “development” in subsection 41 of the Planning Act.
71.	Mark Dorfman (Planner Inc)	General	08-13-2025	(c) The exemptions for a Detached Building, an addition to a Detached Building, a Coach House and an addition to a Coach House is not clear. The definition of Detached Building is a building with up to 4 dwelling units, and Coach House is an Additional Residential Unit. Subsection 10 (15) of O. R. 173/16 applies to the CPP By-law by exempting certain provisions of section 41 of the Act. I highlight this since Subsection 41 provides for designated site plan control areas. If the CPP areas are not site plan control areas or equivalent to site plan control areas, then this should be stated in the CPP By-law. As well, I am wondering why a detached building with up to 4 dwelling units are exempt, whereas section 41 (1.2) of the Act exempts "no more than 10 residential units” from the definition of "development”.	Section 10 (14) of O. Reg. 173/16 indicates that Section 41 of the Planning Act does apply to CPPS. Section 1B.2 - Exemptions outlines a number of exemptions for types of development that shall not require a community planning permit. Detached buildings with up to four units would not require a Community Planning Permit (recently Council approved 4 units, 4 storeys on a serviced lot), assuming all applicable by-law requirements are met. Applying site planning to townhouse developments will ensure that important matters are addressed such as site circulation, accessibility, lighting among other matters.
72.	Mark Dorfman (Planner Inc)	General	08-13-2025	Why are exemption of a detached building and a coach house not included in Class 1 CPP?	A detached building and coach house are exempt from having to obtain a CPP permit. A decision was made, based on feedback on the second draft and a review of other CPP By-laws, that detached buildings with up to four units would not require a Community Planning Permit (recently Council approved 4 units, 4 storeys on a serviced lot), assuming all applicable by-law requirements are met.
73.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.3.4, the opinion that a Class 2 application should be considered as a Class 3 application should rest with staff and council and not with the prospective applicant.	Similar to other communities with CPPS, we have included this provision to permit applicants the opportunity should they feel a necessity.
74.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.3.5, there should be criteria that assist the staff to refer a Class 1 or 2 application to Council for a decision whether this matter is a Class 3 application.	Comment noted. This standard as written is similar to other communities that have CPPS in effect.
75.	Mark Dorfman (Planner Inc)	General	08-13-2025	Table 1A should be clear that these are the Public Notice Procedures for CPP applications and not decisions.	Comment noted and will be reflected in the final by-law.
76.	Mark Dorfman (Planner Inc)	General	08-13-2025	In Table 1A, in the column for Notice for a Class 3 application, it should read “Mail or email to registered owners of land and to residents within 120 metres of the property that is the subject of a CPP application”.	Comment noted.
77.	Mark Dorfman (Planner Inc)	General	08-13-2025	Section 1B.4.2 should clarify by adding the provisions in section 17(5) of O.Reg. 173/16. Council is required to declare by resolution that a request to amend the CPP By-law is permitted.	Comment noted and will be reflected in the final by-law.
78.	Mark Dorfman (Planner Inc)	General	08-13-2025	Section 1B.6.1 includes the criteria to vary the standards when considering Class 2 and Class 3 applications. It is assumed that the seven criteria are intended to reflect the tests under section 45 of the Planning Act.	The Committee of Adjustment four tests are being enhanced by criteria established within the By-law as outlined in section 1B.6 as it is broader than simply minor variance.
79.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.6.1, the use of the word "intent" in the sentence should also include "purpose".	Comment noted and will be reflected in the final by-law.
80.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.6.1, criterion (e), the reference to "adverse impacts" should be clarified to determine the nature of the impacts. There may	Comment noted.

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				be confusion with the term "adverse effects" used in the Environmental Protection Act	
81.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.9, there should be a provision that would attempt to mitigate a dispute between a prospective applicant and City staff, prior to the submission of an application.	Comment noted.
82.	Mark Dorfman (Planner Inc)	General	08-13-2025	Since there is a relatively short 45-day window between the submission of a permit application and the notice of complete application, the up-front consultation is critical. Compatibility between the proposed developments and where people live in existing housing should be a priority consideration. The City should undertake a screening exercise to determine the specific initial compatibility impact assessments that are warranted and require the proponent to prepare and complete compatibility impact assessments from existing and planned housing areas. These assessments should form part of the application.	The development regulations for the CPPS areas have been carried over from the existing Zoning By-law and represent the long-term planning vision for these areas. Should applications be submitted requesting relief from the development regulations, depending on the scale, Staff can request a Planning Justification Report as part of a complete application. This can include land use compatibility and impacts to neighbouring properties.
83.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B.9, if City staff agrees with the prospective applicant that the proposed "development" is exempt, then the City staff should provide the prospective applicant with a written confirmation of this decision.	Comment noted.
84.	Mark Dorfman (Planner Inc)	General	08-13-2025	In section 1B. 10.1, reference is made to Schedule 1 of O. R. 173/ 16. These are the information and material that shall be provided in an application. It is not evident whether the Waterloo Official Plan contains required additional information and materials, as prescribed in section 3 (4) (a). Section 1B. 11. 1 should clarify whether technical studies and reports also refer to information and material.	The Official Plan, through OPA 58, includes additional information and materials above and beyond those prescribed in O. Reg. 173/16. Specifically, it refers to OP section 12.2.16 Complete Applications.
85.	Mark Dorfman (Planner Inc)	General	08-13-2025	In Schedule 1 of O. R. 173/16, Section 23 (g) refers to easements and restrictive covenants. Where they exist, the CPP By-law should indicate how the City intends to consider these restrictions on the property that is subject to the application. In my experience, with restrictive covenants the City should determine in the pre-application consultation whether the restrictive covenant is valid or expired according to section 119 (9) of the Land Titles Act, R.S.O. 1990, as amended, and the relevant interpretations by the Court. As well, the City should establish whether the existing development of the subject property is considered a Building Scheme.	Comment noted. It is our understanding that the CPPS process does not have any impact on the existing covenants/Building Schemes process.
86.	Mark Dorfman (Planner Inc)	General	08-13-2025	In Section 1B.12.2, the requirement should state that on-site signs shall be visible to the public from the Street.	Commented noted and will be reflected in final by-law.
87.	Mark Dorfman (Planner Inc)		08-13-2025	In section 1B. 12.3, the notification should read, "Mail or e-mail to registered owners of land and to residents within 120 metres of the property that is the subject of a CPP application" and that the on-site sign is visible from the Street.	Commented noted.
88.	Mark Dorfman (Planner Inc)		08-13-2025	In section 1B.13.3, there should be a type of condition of approval that requires the resolution of property restrictions caused by easements and restrictive covenants.	Comment noted. The conditions in provision 1B.13.3 include f) the conveyance of land for any specified reason, j) the provision and capacity of transportation and servicing infrastructure, l) the availability of municipal infrastructure and services, o) orderly growth and development and s) entering into agreements related to any condition. We understand these to be sufficiently broad to cover off the specific circumstance noted.

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89.	Mark Dorfman (Planner Inc)	General	08-13-2025	In Section 1B.14, a clause should be added to indicate that only a registered owner of land within the CPP area may appeal the CPP By-law.	Comment noted.
90.	Mark Dorfman (Planner Inc)	General	08-13-2025	Section 1B.20 refers to the consolidation of land within the CPP area and abutting lands located beyond the boundary of the CPP area. This implies that a consent to server may be needed to consolidate the lands, keeping in mind that more than 50% of the consolidated land is within the CPP area. Consideration should be given to a situation where the boundary of the CPP area is located within a registered property, and where there may be more than one prescient on the subject property.	Comment noted and will be considered. Please note that the CPPS process does not cover off any modifications to title, and the existing consent/draft plan process will remain. Regarding the second part of the comment, please refer to section 3.S.5 Split Precincts.
91.	Mark Dorfman (Planner Inc)	General	08-13-2025	Definition a) the bedroom definition states what is not a bedroom. The definition should clarify the positive that there are beds occupied by people in the bedroom b) the By-law should define covenant, restrictive covenant, easement c) "affordable dwelling unit" and "lot" needs to be clarified. (d) The By-law should define "easement". (e) The definition of "Lot" should be clarified. There are interpretations that suggest that the PIN (Property identification Number) for a parcel may be a Lot for purposes of the By-law. This becomes confusing and the definition should be clear that the PIN may not describe the boundary of the Lot. (f) "Reserve Lot Line" is defined. A "reserve" is defined. I have seen reserves that are privately owned. This should be included. (g) I wonder whether this definition of "PERSON" is found in a statute or regulation in Ontario. (h) "Use" should state that lot, building, structure are used by a "PERSON".	For consistency with our existing regulations, Definitions contained within the CPP By-law have been carried over verbatim from the Zoning By-law. Staff will consider the comments on the definitions for future general amendments.
92.	Mark Dorfman (Planner Inc)	General	08-13-2025	Wonder whether section 3.B.4.3 is interpreted as there is no regulated maximum number of bedrooms in these buildings/units?	That is correct, the existing Zoning By-law and the Draft CPP By-law do not restrict the number of bedrooms within the types of developments listed in 3.B.4.3, rather, the City's Rental Housing Licensing By-law restricts the number of bedrooms that may be rented within these types of buildings.
93.	Mark Dorfman (Planner Inc)	General	08-13-2025	Section 3.N.2 should distinguish between non-conforming uses and non-complying properties.	The By-law has regulations for nonconforming uses, structures, lot fabric.
94.	Mark Dorfman (Planner Inc)	General	08-13-2025	Wonder whether there are situations where a "Reserve" does not abut a street?	Typically reserves are for future road access but there are other circumstances such as shoreline reserves.
95.	Mark Dorfman (Planner Inc)	General	08-13-2025	The term "standard" is used in the by-law, statute and regulation. Wonder whether there is merit in defining this term. For example, is "use" a standard?	The term is used in titles and section headers for convenience and ease of reading. It is not used as part of a regulation in and of itself. As such, staff do not feel there is need to define it.
96.	Mark Dorfman (Planner Inc)	General	08-13-2025	Section 4.3 should qualify that since the Waterloo Comprehensive Zoning By-law does not apply to the CPP area, there would be no conflict.	This is standard regulation that exists to clarify what happens in the event that two By-laws conflict with each other.
97.	Mark Dorfman (Planner Inc)	General	08-13-2025	Applicable law is vague. Don't understand how this applied in this By-law.	Applicable Law refers to any other piece of legislation (municipal, provincial, or federal) that may be applicable to a property. As it would be impossible to list all legislation that may be applicable to any given property, a general statement is used.
98.	Mark Dorfman (Planner Inc)	General	08-13-2025	"LAND USE in section 5.3 is not the correct term. Change this to "Use of Land, Building or Structure".	This has been carried over from the existing Zoning By-law. Land Use in Section 5.3 is being used as a section title, not as a regulation or a defined term.

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99.	Mark Dorfman (Planner Inc)	General	08-13-2025	(b) Section 5.4 “Offense - Bedrooms”. I am wondering if this is an enforceable offense if the offensive habitable floor space is "temporarily" or “occasionally” used as for sleeping. A clear temporal qualification should be stated. I am wondering how this offense would “contravene the provisions of this BY-LAW including density”.	This has been carried over from the existing Zoning By-law. Staff will consider the comments for future general amendments.
100.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Recommend that the City follow suit with the provincial direction to expedite these forms of small-scaled, missing middle housing projects and exempt projects of ten or less units from the CPP By-law. Alternatively, recommend that the City allow for such projects to proceed through the CPPS process on an optional basis so that matters related to zoning compliance review and variances can be processed via one (1) application.	Comment noted. The second Draft By-law exempts detached buildings with up to four dwelling units from a permit. CPPS's ability to require site planning for developments with 10 or less units comes from O. Reg. 173/16 and a specific provision in O. Reg. 173/16, s.10(14), that says s.41 (Site Plan Control) of the Planning Act applies to an application for a CPP. Applying site planning to townhouse developments and apartments with five or more units will ensure that important matters are addressed such as site circulation, accessibility, lighting, road widenings among other matters.
101.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Recommend that the requirement for receipt of staff and agency comments be removed from the ‘completeness review’ stage of the process, and that the 45 day review period rather begin upon receipt of required submission materials. As an alternate, some municipalities such as Guelph and London have implemented optional processes whereby applicants can submit scoped applications for municipal and agency reviews in advance of submitting a formal Planning Act application. In essence, this is an intermediary but optional step between a Pre-Submission Consultation and formal Planning Act application where formative issues can be identified and resolved prior to submitting a formal application. From a development perspective, particularly on complicated files, this can be an advantageous step to resolve issues prior to formally preparing a complete Planning Act application which can provide cost and coordination benefits for a given project. From a municipal standpoint, this form of informal review can help expedite review and approvals if/once a formal application is made by resolving outside of statutory review timelines. For such reviews, both the City of London and Guelph collect a review fee and commit to providing comments on the pre-application submissions within set timeframes.	Comment noted and will be considered as part of the final By-law.
102.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Recommend that the Class additional notice requirements be removed, as proposed in the initial draft.	The Class 2 notice requirements were included based on resident feedback received on the first draft, a review of other CPP By-law notification requirements (such as Guelph as a comparator), and noting that Class 2 applications are akin to the Committee of Adjustment Minor Variance process which has notification requirements despite also not having third party appeals.
103.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition B speaks to the requirement for additional studies, plans and documents. While it is acknowledged that through the development review process additional matters may warrant further review or consideration, as currently drafted this condition is very open ended and seems to negate the importance of accurate study requirements to be identified at the Pre-Submission Consultation stage. In our opinion, this condition lacks clarity and should be scoped to provide certainty of process.	Comment noted. O. Reg. 173/16 which governs CPPS, requires municipalities to list the types of conditions that may be included in a CPP By-law. In line with other municipal CPP By-laws (such as Guelph as a comparator) these conditions are broad to account for a multitude of development scenarios.

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104.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition D speaks to the achievement of performance criteria and standards, including those related to urban design. Clarity is requested with regards to this condition, in particular as it relates to performance criteria. We recommend that the By-law explicitly reference objective, measurable criteria tied to existing policy documents or guidelines, to avoid introducing subjective interpretations that could lead to inconsistent or contested outcomes.	The conditions for approval listed in 1B.13.3 are not meant to be taken as a list of requirements for permit approvals. Rather, they are broad categories of items that may be required or agreed upon for a development that do not need to be completely resolved prior to a decision on the permit being rendered. For example, a permit requesting relief may be given conditional approval on the grounds that a certain energy efficiency standard will be met, or high-quality urban design improvements to the street frontage will be made. These conditions allow the decision to be made on the permit application, even if the exact details for these elements have not been completed.
105.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition G relates to confirmation of site rehabilitation/remediation. While the intent of this condition is well understood and appreciated, it is suggested that this condition be clarified to provide that the confirmation of site remediation should be achieved prior to the issuance of a Building Permit but not required prior to issuance of a CPPS approval/permit.	See comment above.
106.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition I relates to the efficient use and conservation of energy. The same comments offered with regards to proposed condition 'd' are offered with regards to this proposed condition.	See comment above.
107.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition M relates to the provision of attainable and/or affordable housing units. Clarity is requested with regards to this condition. In accordance with the Planning Act, the requirement to provide affordable or attainable housing within a development is limited to PTMSAs where a municipality has passed an Inclusionary Zoning By-law and where a policy framework within the Official Plan is in place. While these permissions could extend to much of the uptown portion of the CPPS area if/when inclusionary zoning is implemented in the City, it cannot be required for non-PTMSA areas of the study area.	CPPS legislation O. Reg. 173/16 permits municipalities to require facilities, services and matters (inclusive of affordable housing) in a CPPS area in exchange for extra height and/or density. The legislation does not limit the geographic scope of where facilities, services and matters can be applied to. Facilities, services and matters are outlined in section 1B.15. The IZ provisions have been carried over into the CPP By-law and will continue to apply to properties within Uptown PMTSAs.
108.	David Galbraith (UP Consulting) on behalf of Build Urban	General	09-10-2025	Condition O relates to the orderly development of land. In our opinion this condition is too broad and requires clarity / scoping.	The orderly development of land is important particularly for multi-phased developments ensuring access to infrastructure, roadways, compliance with Building Code requirements among other reasons.
109.	Trevor Hawkins (MHBC)	26-28 Dorset and 7 Princess	07-10-2025	Timeline for second draft, opportunities to implement OPA 58 through the CPP By-law. Concerns with current proposed zoning.	The second draft incorporated Council adopted OPA 58 modifications, including the increase of maximum building heights on certain lands with an 81 metres suffix in the Uptown PMTSA (but outside of the Laurel/Clair Special Policy Area) from 81 metres (25 storeys) to 105 metres (30 storeys). The subject property is designated Uptown (U)-40 in the CPP By-law which has been carried over from the Zoning By-law albeit with a slight name change. Through the City's 2018 Comprehensive Zoning By-law Review, planning staff evaluated a number of properties within the Uptown Core which strategically and thoughtfully applied reduced maximum heights to ensure appropriate height transitioning from high density areas to low density areas including on this property.
110.	GSP Group	General	09-11-2025	Will IZ apply to the CPPS area once approved, or will this be deferred? Is IZ proposed to apply to the whole CPPS area (including Erb St Corridor). Or would IZ only apply to MTSA's in the CPPS?	This past spring, Council deferred making a decision on the timing of implementation of IZ. IZ Staff will take a report to Council in early 2026 with recommendation on IZ implementation timing. The City's IZ framework only applies to the City's PMTSAs. Schedule D - MTSA's in the second draft shows this delineation.

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111.	GSP Group	General	09-11-2025	To confirm, Class 2 & 3 applications in the Erb Street corridor which increase residential density would provide a minimum % of affordable units or CIL (cash-in-lieu) of said affordable units. Is that correct? Would the timing of Council approving this requirement on Erb also be tied to IZ timing, or are they separate?	Correct and the CPPS facilities, services and matters implementation would be separate from IZ implementation timing. The City retained a consultant, NBLC, to undertake an analysis of the inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located out the Major Transit Station Areas in the CPPS boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
112.	Andrea Sinclair (MHBC) on behalf of LPMR (Westhaven) GP Inc	414 Westhaven Street	07-12-2025	Request to remove property from the limits of the CPPS by-law area.	Request granted as this property is the sole property on the south side of Erb Street West between Westhill Drive and Fischer-Hallman Road South in the CPP area and its removal will not cause any gaps in the mapping. The change will be reflected in the final By-law.
113.	Andrea Sinclair (MHBC) on behalf of Multiple Uptown Properties	Multiple Properties Uptown(35 King St N, 23-25 King St N, 15 King St N, 24 King St N, 124-134 King St S, 50-54 King St N, 85 King St N, 89-91 King St N, 2 King St N, 28 King St N, 0 Regina St N, 3 Regina St N and 12 Dupont St W	09-12-2025	The measuring of density by bedrooms per hectare will penalize developments that offer multi-bedroom units in terms of as-of-right density permissions. If the City wishes to encourage family-oriented high-density development, need to move away from per-bedroom calculations....Concern the density framework continues to be misaligned with height permissions, which may serve to artificially inflate the requirement for “Facilities, Services and Matters” within the CPPS area...Uptown properties tend to be smaller, resulting in a lower as-of-right bedroom permission when compared to larger sites found outside of the core. Recent development proposals have consistently required relief from the restrictive bedroom per hectare density permissions, even in cases where the height was aligned within the current permissions (examples provided)....If the City is going to continue with the bedroom per hectare model, a substantial increase in density needs to be considered to allow sites to reasonably develop with the heights that are permitted. The City should consider moving away from including a maximum density all together as it is typically height, not density, that has more of an impact on surrounding properties. The City could still require “Facilities, Services and Matters” in exchange for height increases beyond the current permissions. The City should be encouraging and directing development and density to the Uptown as this represents a Strategic Growth Area.	Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, Official Plan staff will be reviewing the City’s Nodes and Corridors framework as a whole which could potentially result in future changes.
114.	Andrea Sinclair (MHBC) on behalf of Multiple Uptown Properties	Multiple Properties Uptown	09-12-2025	Have concerns respecting any additional costs of development created within the CPPS area during the current economic climate and housing crisis. Please confirm that there will be no further affordable housing requirements within MTSAs, but that there may be other “Facilities,	The second draft proposes a Complete Community Contribution Fee for all lands (in place of a Community Benefits Charge) and 1. has carried over IZ requirements into the CPP By-law which will apply to any properties located within a Protected Major Transit Station Area (PMTSA) and 2. affordable housing requirements (units/cash-in-lieu) along the remnant Erb Street Corridor. The City retained a consultant, NBLC, to undertake an analysis of the

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				Services and Matters” required (the details of which are not currently available).	inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located out the Major Transit Station Areas in the CPPS boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
115.	Andrea Sinclair (MHBC) on behalf of Multiple Uptown Properties	Multiple Properties Uptown	09-12-2025	The degree of variability for front/exterior yard setbacks remains minimal. This doesn’t recognize that reduced front/exterior yard setbacks are often required as a result of road widenings. The CPPS by-law should include a provision that allows the director to deem a Class 3 permit as a Class 2 for situations like road widenings, similar to the provision that allows the director to escalate a permit to a Class 3.	Comments noted. While there is an ability to elevate an application from a Class 2 to a Class 3, unfortunately there is not an ability to do the reverse. Sufficient front yard setbacks are necessary due to hydro setbacks, the desire for trees among other important factors.
116.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Please confirm that Zoning Application Z-25-23 will continue to be considered by Council under the current planning process even if approvals are not in place when the CPPS by-law is approved next year. The transition regulations are not clear in this regard.	Yes, this is correct that an in-process ZBA application will be able to continue within the current process noting that if Council approval is obtained prior to the CPP By-law going into effect, any site specific regulations will be carried over into the CPP By-law. If Council approval comes after the CPP By-law is in effect, then the ZBA will need to include provisions that incorporate it under the CPP By-law inclusive of any site specific regulations which will be captured by way of a future General Amendment. Regardless, any existing ZBA will need to obtain a Class 1 permit (which is akin to the current site planning process) unless a formal site plan application has been submitted to the city prior to the effective date of the By-law in line with the Transition Provisions in section 1A.9.
117.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Please confirm our understanding that for site specific regulations, a maximum percentage of permitted variation has not been applied in the CPPS by-law.	Variations to a site specific would necessitate a Class 2 application, of which there is no maximum percentage identified in the second draft, unless deemed a Class 3 application by the Director of Planning.
118.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Through OPA 58, the subject lands received a site-specific policy allowing a maximum height up to 38 storeys (with an average height of all buildings on the lands to be no greater than 35 storeys). This was approved by Council in July 2025 with a request to be considered by the Ministry as part of the OPA 58 review. The recent submission made to the city reflects the Council adopted height permission. Request confirmation that the additional height permission will be added via a site-specific regulation for these lands, should the CPPS by-law be in place prior to Council consideration of the Zoning By-law Amendment.	Subject to Ministerial approval, yes a provision would be added to the relevant site specific in Schedule C-Site Specifics of the CPP By-law.
119.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Through communications with Planning Staff, it was understood that in Protected Major Transit Station Areas (PMTSA) only a Complete Community Contribution fee will apply as these areas are already going to be subject to affordable housing requirements via Inclusionary Zoning. This appears to be reflected in Table 1B.15A. Notwithstanding, Regulation 1B.15.11 notes that facilities, services and other matters are	Under section 1B.15 Facilities, Services and Matters, yes the intent is that in PMTSAs there will be a Complete Community Contribution fee. IZ requirements will also apply in PMTSAs which is the intent behind provision 1B.15.11 noting that the IZ requirements have been carried over from the existing Zoning By-law.

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				required in addition to the inclusionary zoning requirements. Please confirm our understanding that Regulation 1B.15.11 is referring to other “Facilities, Services and Matters” that have yet to be identified in the CPPS by-law, as opposed to additional affordable housing obligations.	
120.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Concerns respecting any additional costs of development created within the CPPS area during the current economic climate and housing crisis. This concern is particularly acute as the City is continuing with a density framework that is misaligned with height permissions, which may serve to artificially inflate the requirement for “Facilities, Services and Matters” within the CPPS area. The measuring of density by bedrooms per hectare will penalize developments that offer multi-bedroom units in terms of as-of-right density permissions	Comments noted. Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, Official Plan staff will be reviewing the City’s Nodes and Corridors framework as a whole which could potentially result in future changes.
121.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	Section 1.B.6.2 is requiring a “balanced” mix of dwelling unit types. The term “balanced” is undefined and could suggest an equal mix of all unit types, which is an approach that prevents development from being tailored to meet market demand/affordability. We suggest revising the language in Section 1.B.6.2 to prioritize the provision of a mix of dwelling unit types (i.e. remove the word “balanced”).	Comments noted and will be taken into consideration for the final By-law.
122.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	It is understood that a permit application will be reviewed within 45 days of the application being received. Are subsequent submissions or resubmissions held to the same review period?	A resubmission would not restart the clock, but a new application would.
123.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	If the subject lands have zoning approved by Council under the current process, how would a CPPS application for site plan differ from the current site plan process? Through the CPPS process, will new conditions and requirements be established throughout the process, or will there be assurance that the conditions provided after the 45-day review are all that are required to be satisfied to obtain a permit?	As CPPS combines a zoning by-law amendment, minor variance and site planning all in one, the conditions provided after the 45 day review should be the only ones that need to be satisfied in order to obtain a permit.
124.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	We appreciate that more flexibility has been added to the degree of permitted variance. With respect to front and exterior yard setbacks, the degree of variability remains minimal (for example a 4 metre front yard setback could only be decreased by 0.4 metres before Council approval is required). This doesn’t recognize that reduced front/exterior yard setbacks are often required as a result of road widenings. The CPPS by-law should include a provision that allows the director to deem a Class 3 permit as a Class 2 for situations like road widenings, similar to the provision that allows the director to escalate a permit to a Class 3.	Comments noted. While there is an ability to elevate an application from a Class 2 to a Class 3, unfortunately there is not an ability to do the reverse. Sufficient front yard setbacks are necessary due to hydro setbacks, the desire for trees, sufficient landscaping among other factors.
125.	Andrea Sinclair (MHBC) on behalf of VanMar Developments	167-171 King St S	09-12-2025	It remains unclear how long a CPPS permit is valid for. The transition regulations provided for timelines associated with applications submitted prior to the effective date of the CPPS by-law, but does not appear to provide timelines for future permits. What is the process if an extension is required to a CPPS permit?	Comment noted and will be considered for the final By-law.

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126.	Andrea Sinclair (MHBC) on behalf of VanLegend Regina LP	6 Regina St N, 24, 28, and 32 Erb St E	09-12-2025	With respect to the transition regulations under Section 1A.9.4, we continue to be concerned with the timing regulations being tied to building permit given the current market conditions and instability in the housing market. Further, it was not clear what the process would be if an extension is required. We would strongly recommend a clause that allows extension at the discretion of planning director to avoid a permit or Council approval if an extension if requested. This would be more in keeping with the current process for site plan approved sites.	Comments noted and will be considered for the final By-law. It is noted that the transition provision timelines were already extended a few years back to account for the development landscape.
127.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Have concerns respecting any additional costs of development created within the CPPS area during the current economic climate and housing crisis. This concern is particularly acute as the City is continuing with a density framework that is misaligned with height permissions, which may serve to artificially inflate the requirement for “Facilities, Services and Matters” within the CPPS area.	Comments noted. Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, Official Plan staff will be reviewing the City’s Nodes and Corridors framework which could potentially result in future changes.
128.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Request confirmation that the Section 37 Agreement negotiated through Minutes of Settlement will continue to apply to the future development of the King and John Site and that this will prevail over any requirement for “Facilities, Services and Matters” that may otherwise be applied to increased density under the proposed CPPS By-law.	Yes the Section 37 reflected in the Minutes of Settlement will continue to the apply to any future development on this site. Clarification will be provided to section 1B.5 Facilities Services and Matters to reflect this.
129.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Through OPA 58, the King and John Site received a site-specific policy allowing a maximum height up to 38 storeys (with an average height of all buildings no greater than 35 storeys). We request confirmation that the additional height permission will be added to the site-specific zoning regulations for these lands. (Otherwise, reconciling the increased height of the OP with the CPPS zoning would be considered a Class 3 Council Variation, requiring Council approval for something that Council has already approved.)	Subject to Ministerial approval, yes a provision would be added to the relevant site specific in the Schedule C-Site Specifics of the CPP By-law.
130.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	We support the approach that site specific variation will require a Class 2 CPP permit and support this approach being carried over into the final by-law. Please confirm our understanding that for site specific regulations, a maximum percentage of permitted variation has not been applied in the CPPS by-law	Correct a maximum percentage of permitted variation was not applied in the second draft CPP By-law.
131.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	The measuring of density by bedrooms per hectare will penalize developments that offer multi-bedroom units. If the City wishes to encourage family-oriented high-density development, there needs to be a more realistic/market driven density metric. The density permissions should be aligned with the heights that are expressly permitted in the Official Plan.	Staff are reviewing how density is measured throughout the city. Also, as part of Phase 2 of the City’s Official Plan Review, Official Plan staff will be reviewing the City’s Nodes and Corridors framework which could potentially result in future changes.
132.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Section 1.B.6.2 requires a “balanced” mix of dwelling unit types. The term “balanced” is undefined and could suggest an equal mix of all unit types, which is an approach that prevents development from being tailored to meet market demand/affordability. We suggest revising the language in Section 1.B.6.2 to prioritize the provision of a mix of dwelling unit types (i.e. replace the word “balanced” with “mixed”). The	Comments noted and will be taken into consideration for the final By-law.

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				CPPS by-law should be flexible enough to respond to the everchanging market.	
133.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Please confirm that the consent would occur through the Committee of Adjustment with any related variances required to be approved as a condition of the consent (through a CPPS permit).	Yes this is correct that a consent needs to occur first at the Committee of Adjustment and will have a condition of approval that any required relief be approved through a CPP.
134.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Through communications with Planning Staff, it was understood that in Protected Major Transit Station Areas (PMTSA) only a Complete Community Contribution fee will apply as these areas are already going to be subject to affordable housing requirements via Inclusionary Zoning. This appears to be reflected in Table 1B.15A. Notwithstanding, Regulation 1B.15.11 notes that facilities, services and other matters are required in addition to the inclusionary zoning requirements. Please confirm our understanding that Regulation 1B.15.11 is referring to other “Facilities, Services and Matters” that have yet to be identified in the CPPS by-law, as opposed to additional affordable housing obligations.	Under section 1B.15 Facilities, Services and Matters, yes the intent is that in PMTSAs there will be a Complete Community Contribution fee. IZ requirements will also apply in PMTSAs which is the intent behind provision 1B.15.11 noting the IZ requirements have been carried over from the existing Zoning By-law.
135.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	CPPS permits provisional approval or approval with conditions. One of the challenges with the current site plan process is that each submission results in new comments that must be satisfied (often resulting in several resubmissions). Through the CPPS process, will new conditions and requirements be established throughout the process, or will there be assurance that the conditions provided after the 45-day review are all that are required to be satisfied to obtain a permit?	As CPPS combines a zoning by-law amendment, minor variance and site plan approval all in one, the conditions provided should be the only ones that need to be satisfied in order to obtain a permit.
136.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	It is understood that a permit application will be reviewed within 45 days of the application being received. Are subsequent submissions or resubmissions held to the same review period?	A resubmission would not restart the clock, but a new application would.
137.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	It is unclear if the CPPS program will allow phased development, such that any conditions of approval can be broken out by phase or block. Can CPPS applications be submitted on a phase-by-phase basis, similar to a phased site plan approach?	Yes, development can be phased. During pre-consultation, the City may recommend phased CPP applications or the use of conditions to address phases of development.
138.	Andrea Sinclair (MHBC) on behalf of 6965083 Canada Inc.	209, 215, 217 King St S, 11 John St W and 176, 180 and 182 Caroline St S	09-12-2025	Please confirm if there is a lapsing period for any CPPS permit that is issued. If so, what is the timing, and how are extensions (if required) determined?	The second draft does not identify a lapsing period for the issuance of a CPPS permit. This will be considered for the final By-law.
139.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	Have concerns that certain elements included within the draft by-law are contrary to recent changes to other sections of the Planning Act (in particular, Sections 22, 34, 37, 41 & 51) which remain the foundation of the majority of existing development approvals processes in the Province. City is encouraged to revisit the inclusion of certain	Comment noted. CPPS is regulated by section 70.2 of the Planning Act and O. Reg. 173/16.

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				components of the CPPS to better align with the spirit of recent Planning Act changes	
140.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	Bill 23: One key change introduced through Bill 23 is the elimination of all matters of exterior design from the site plan approval process. We request consideration be given to removing all requirements regulating exterior site and building design from the Draft CPP By-law and Draft Uptown and Erb Street Corridor Urban Design Guidelines.	Comment noted. Facilitating the realization of complete communities and a high standard of urban design are among the objectives of the CPPS and are important consideration for residents and tenants who live in developments. Despite Bill 23, the City still has high expectations for exterior design and will continue to strive for a high standard of design and quality materiality in Waterloo.
141.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	Bill 23 also excluded development containing no more than 10 residential dwelling units from the site plan approval process. We request consideration be given to exempting development with 10 or less residential dwelling units from the CPPS process entirely, to align with recent changes as implemented by Bill 23	Comment noted. The second draft By-law exempts detached buildings with up to four dwelling units from requiring a Community Planning Permit. CPPS's ability to require site planning for developments with 10 or less units comes from O. Reg. 173/16 and a specific provision in O. Reg. 173/16, s.10(14), that says s41 (Site Plan Control) of Planning Act applies to an application for a CPP. Applying site planning to townhouse developments and apartments with five or more units will ensure that important matters are addressed such as site circulation, accessibility, lighting, road widenings, among other factors, that impact resident quality of life and that are not part of the Building Permit process.
142.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	Bill 185: The 2nd draft continues to propose mandatory pre-submission consultation for all CPP applications (Section 1B.9), whereas Section 22, Section 34, Section 41 and Section 51 of the Planning Act no longer include requirements for formal pre-submission consultation. We request the language of Section 1B.9 of the CPP By-law be modified to encourage voluntary pre-submission consultation.	Comment noted. Pre-submission and complete application requirements are permitted under O. Reg. 173/16 and are a critical step so that staff and/or Council have all the information needed to make an informed decision within the 45-day review period. Pre-consultation is a best practice among municipalities that have advanced a CPPS. As well, in practice, a CPPS pre-consultation intends to benefit both the City and the applicant, because it becomes a singular opportunity during which the complete application requirements must be defined for the applicant. It provides the Applicant with certainty as to what is required to obtain a permit.
143.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We request consideration be given to removing Regulation 1B.3.5 to improve predictability of the approval process. Alternatively, we request that Regulation 1B.3.5 outline the considerations and/or criteria that would require a Class 1 or Class 2 application to be deferred to Council at the discretion of the Director of Planning.	Comment noted. Given that this is a new tool and flexibility to support implementation is desired, criteria have not been established in the Draft CPP By-law for provision 1B.3.5 nor 1B.3.4 (applicants ability to “bump” up an application to Council). The project team will consider defining criteria in the implementation materials to provide some predictability for both 1B.3.4 and 1B.3.5.
144.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We support the approach to identify specific variation thresholds to each precinct as proposed, rather than applying a standard variant threshold across the entire Community Planning Permit area.	Comment noted.
145.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We encourage the City to copy language from the “four tests” of the Planning Act for minor variances to better mirror existing and well-established criterion for variances.	Comment noted.
146.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We request that consideration be given to deleting Regulation 1B.6.2 as we are of the opinion that dwelling unit mix has no bearing on the appropriateness of varying a standard CPPS regulation (setbacks, lot width, etc.).	Comment noted. Council, residents and certain agencies have expressed the need for multi-bedroom units in development.
147.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We request consideration be given to noting the existing Special Policy Area, Candidate Two Zone and Floodway as “deferred” as part of the CPP By-law until such time that the deferral of these areas is removed from the Official Plan (as established by the approval of OPA 58). Furthermore, we request consideration be given to including an appropriate overlay on Schedule A – Precincts, to identify those areas that are subject to the deferral as well.	The deferred area through OPA 58 applies to the Official Plan. Staff are of the opinion a deferral is not necessary in the CPP By-law as it is implementing by-law regulations. A provision was added to the second draft that states, “Within the Laurel/Clair Special Policy Area, any height and density proposed beyond current Official Plan permissions will be subject to an application for an Official Plan Amendment and existing Provincial procedures regarding Special Policy Areas.” Therefore, provided compliance with the Official Plan, applicants will be able to benefit from the advantages afforded by the CPPS. Draft 1 of the By-

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					law included a floodplain overlay as part to of Schedule A-Precincts however it was removed in the second draft in response to a proliferation of comments that the map was too busy and illegible. As such, the second draft contains Schedule A2-Floodplain.
148.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	The Draft Guidelines contains a number of principals and objectives regarding landscape treatments along the King Street and Erb Street corridors. It has been our experience that landscaping, street tree plantings and furniture placement are strictly controlled and approved by the Region of Waterloo, which may make it difficult to achieve some of the objectives of the Draft Guidelines as it related to landscape treatments along King Street and Erb Street. We continue to request confirmation that the Draft Guidelines have been discussed and reviewed with the appropriate representatives at the Region of Waterloo.	Regional staff were circulated on both drafts of the guidelines and comments incorporated.
149.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	Section 2.2.10. of the Draft Guidelines specifically references a 30 metre zone straddling the centre line of the Laurel Trail (15 metres on either side) where no new buildings are permitted to be constructed. The April 2023 Laurel Greenway Master Plan notes that the Laurel Greenway area is not a consistent 30-metre width. We are apprehensive about including this setback to built form in the Guidelines. We suggest that the setback requirement should be revised to align with the Laurel Greenway Master Plan's flexibility and adaptation to redevelopment opportunities, as a blanket restriction may unduly constrain high-density development envisioned for the Uptown area. Moreover, in the context of the Uptown, opportunities for development to engage with the Laurel Trail should be prioritized, fostering a more cohesive and active public realm rather than isolating it behind a uniform buffer zone.	Comment noted.
150.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We request consideration be given to removing all requirements regulating exterior site and building design from the Draft Guidelines. Moreover, reiterating building form requirements already set out in the zoning bylaw is unnecessary and redundant, as guidelines should provide supplementary guidance rather than reinforcing existing policy frameworks.	Comment noted. Facilitating the realization of complete communities and a high standard of urban design are among the objectives of the CPPS and are an important consideration for residents and tenants who live in developments and communities. Despite Bill 23, the City still has high expectations for exterior design and will continue to strive for a high standard of design and quality materiality in Waterloo. These Guidelines will form part of the City-wide Urban Design Manual and are intended to expand on the Manual's general design direction for all Nodes and Corridors across the City. As such, these Guidelines should both reinforce existing policy and provide supplementary guidance.
151.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	The Draft Guidelines contain imagery that lacks clarity, hindering the readability and comprehension of the content for the intended users. We request that the imagery be enhanced to improve visual quality and clarity of the Guidelines	Comment noted and will be addressed.
152.	Richard Kelly-Ruetz et al. (GSP Group)	General	09-12-2025	We suggest a softer approach to introducing new requirements for developers to allow time for staff to evaluate the impacts of these other recent and upcoming requirements.	Comment noted. The City retained a consultant, NBLC, to undertake an analysis of the inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located out the Major Transit Station Areas in the CPPS boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that

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					the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
153.	Richard Kelly-Ruetz et al. (GSP Group) on behalf of Atrium Waterloo Limited Partnership (AWLP)	9-47 Erb St W	09-12-2025	We continue to request consideration be given to removing all requirements regulating exterior site and building design from the Draft Community Planning Permit By-law and Draft Uptown and Erb Street Corridor Urban Design Guidelines.	Comment noted. Facilitating the realization of complete communities and a high standard of urban design are among the objectives of the CPPS and are important consideration for residents and tenants who live in developments and communities. Despite Bill 23, the City still has high expectations for exterior design and will continue to strive for a high standard of design and quality materiality in Waterloo.
154.	Richard Kelly-Ruetz et al. (GSP Group) on behalf of Atrium Waterloo Limited Partnership (AWLP)	9-47 Erb St W	09-12-2025	Strongly suggest limiting requirements for developer contributions from the CPPS and/or defer implementation until the market has adjusted to other recent requirements.	Comment noted. The City retained a consultant, NBLC, to undertake an analysis of the inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located out the Major Transit Station Areas in the CPPS boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
155.	Richard Kelly-Ruetz et al. (GSP Group) on behalf of Atrium Waterloo Limited Partnership (AWLP)	9-47 Erb St W	09-12-2025	The Site was deferred from land use designations in the City's new Official Plan (OPA 58). To ensure a predictable development approvals process, we request that the Site be deferred from the CPPS. This will allow AWLP's privately-initiated OPA/ZBA application to proceed while outstanding matters related to the Laurel/Clair SPA deferral – such as OPA 58 and the City's comprehensive review of the SPA – are resolved.	An in-process OPA/ZBA application will be able to continue within the current process noting that if Council approval is obtained prior to the CPP By-law going into effect, any site specific regulations will be carried over into the CPP By-law. If Council approval comes after the CPP By-law is in effect, then the ZBA will need to include provisions that incorporate it under the CPP By-law inclusive of any site specific regulations which will be captured by way of a future General Amendment. Regardless, any existing ZBA will need to obtain a Class 1 permit (which is akin to the current site planning process) unless a formal site plan application has been submitted to the city prior to the effective date of the by-law in line with Transition Provisions in section 1A.9.
156.	Ben Eby (Spurline Developments)	General	09-12-2025	Request for City to carefully reconsider the application of CPPS to developments of ten units or fewer. A truly effective system should aim to remove barriers, not create new ones, and should preserve the ability of small, zoning-compliant infill projects to move directly to building permit.	The second draft By-law exempts detached buildings with up to four dwelling units from requiring a Community Planning Permit. CPPS's ability to require site planning for developments with 10 or less units come from O. Reg. 173/16 and a specific provision in O. Reg. 173/16, s.10(14), that says s.41 (Site Plan Control) of the Planning Act applies to an application for a CPP. Applying site planning to townhouse developments and apartments with five or more units will ensure that important matters are addressed such as site circulation, accessibility, lighting, road widenings among other matters. The city will continue to explore scaled application fees and process to align with the scale of development.
157.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern about introducing a new process (the CPPS) process to 10 units or less which are currently exempt from site plan control. Adding a new process could reverse current Provincial trends towards a	See comment above.

#	Commenter	Area of Comments	Date	Comments	Response
				streamlined process to get ‘shovels in the ground’. Request exemption for 10 or less residential units be provided.	
158.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern with Official Plan building height caps, any CPPS application with more than the OP building height will require an Official Plan Amendment and then an amendment to the CPPS bylaw. There will be absolutely no time savings for any application looking to increase height within the CPPS boundary which does not conform to the OP height limits.	As part of Phase 2 of the City’s Official Plan Review, staff will be reviewing the Nodes and Corridors framework which could potentially result in future changes.
159.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern about the inclusion of new affordable housing criteria which have not been subject to a detailed economic study like the Inclusionary Zoning process. Adding community benefits without additional analysis could have a unintended impact to development projects without greater clarification and analysis.	The City retained a consultant, NBLC, to undertake an analysis of the inclusion of affordable housing or a cash-in lieu payment as a means of satisfying FSM in exchange for extra density for the portion of the Erb Corridor located out the Major Transit Station Areas in the Community Planning Permit System boundary. In general, the study found that development feasibility is currently challenged and that it would be beneficial to hold off activating the FSM affordable housing provisions in the Erb Corridor until there is an improved market. It was suggested that the framework still be included in the By-law as it is important that market participants consider FSM into their investment decisions going forward. As such, staff plan to recommend to Council that the FSM affordable housing and cash-in lieu payment provisions for the Erb Corridor be implemented at a later date, and that another analysis be undertaken in 2027 to inform the activation date and ultimate affordable housing rate and cash-in-lieu value.
160.	Ryan Mounsey (Urban Insights)	General	09-12-2025	From the Educational Booklet, the ‘opportunity time’ section should also recognize the current legislation and policy amendments identified in this report, and where there is a conflict, the lower standard should prevail to ensure a streamlined process is achieved. It is our opinion that the City should not be introducing the CPPS to apply greater controls which is contrary to all Provincial directives.	Comment noted.
161.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern that the proposed CPPS does not align with legislative reforms, Provincial intent and does not comply with Bill 23, Bill 109, Bill 17 and the focus should be on streamlining. The Planning Act and reforms introduced through Bill 23, Bill 109, Bill 185, Bill 17, and the PPS 2024 should take precedence over earlier regulations. Municipal CPPS by-laws should be harmonized with more recent statutes and policies.	CPPS is legislated through section 70.2 of the Planning Act and O. Reg. 173/16, neither of which have been amended by the Province through the reforms identified. A CPPS provides a more streamlined development approval process, when compared to the processes that have been the focus of reforms through recent legislation. Many of the legislative changes (such as delegation of approvals, limited third party appeals) already exist in the CPPS process.
162.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern the by-law conflicts with Bills 23 legislation (Site Plan exemption for 10 units or less and removal of exterior architectural controls for such projects) and Bill 185. By making compliance with detailed Urban Design Guidelines a condition of permit approval (related specifically to building materials), the City is in practice restoring discretionary review of building elevations, façades, and materials. Recommendation that the CPPS by-law could be revised to exempt projects of 10 units or less (honoring the Bill 23 exemption or considered a simplified bare bones Class 1 or 2 permit without an agreement) to ensure the greatest alignment with the legislative framework rather than conflict.	The Province has not made any amendments to section 70.2 of the Planning Act and O. Reg. 173/16 which legislates CPPS.

#	Commenter	Area of Comments	Date	Comments	Response
163.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern that CPPS could unintentionally undermine small-scale development economics. If every five-plex or ten-plex infill is forced into a comprehensive permit process with application fees, detailed design requirements, and months of review, the additional carrying costs can eliminate the slim margins that make these projects viable.	Comment noted. We welcome feedback on how the CPPS can be scaled to apply to developments with ten units or less. The City is reviewing other municipal CPPSs that have split Class 2 and Class 3 permits further into Minor and Major applications in terms of fees and process requirements.
164.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Lack of evidence or benchmarking for CPPS effectiveness.	Comment noted. Every municipal CPPS system is different. The initiative will be monitored once implemented. In terms of a comparator mid-sized city with CPPS in effect, earlier this year Guelph implemented CPPS in their Stone Road and Edinburgh Strategic Growth Area which is now in effect.
165.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern about overreach of affordable housing tools in the CPPS. The proposed CPPS affordable housing intentions extend beyond the MTSA affordable housing criteria and is an overreach during a time when the current IZ process is on hold.	CPPS legislation O. Reg. 173/16 permits municipalities to require facilities, services and matters (inclusive of affordable housing) in a CPPS area in exchange for extra height and/or density. Facilities, services and matters is not Inclusionary Zoning, the two are different tools regulated by different legislation. The legislation does not limit the geographic scope of where facilities, services and matters can be applied to.
166.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Concern whether the City can realistically meet the 45-day turnaround in practice, especially for more complex proposals or those requiring Council input.	The CPPS legislation stipulates a decision within a 45-day timeframe after which an applicant has the ability to apply to the Ontario Land Tribunal for lack of decision. This is similar to existing processes being Minor Variance 30 days, Zoning By-law Amendment 90 days, and Official Plan Amendment 120 days. With CPPS being a new tool it will be monitored.
167.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Lack of clarity around how the Class 3 process will work. Questions include: What is the timeline for a Class 3 decision? Will Council decisions also be bound to the 45-day limit, and if so, how can that be ensured given Council meeting schedules? If a Class 3 application misses one Council cycle, does that push the decision past the deadline? Options might include delegating as much as legally possible to staff or a specialized committee, with Council only handling truly major policy departures. If Council must decide, perhaps special expedited meeting procedures will be needed (e.g. an extra Council session within the 45-day period specifically for CPPS decisions). It would also help to define criteria clearly for what triggers a Class 3, to avoid unnecessarily bumping moderate proposals into a political queue.	Refer to Figure 1 in the draft By-law which outlines the process. Applications that exceed the Class 2 permit thresholds would necessitate a Class 3 application. The 45-day statutory timeline would apply to all classes of permits.
168.	Ryan Mounsey (Urban Insights)	General	09-12-2025	The mandatory pre-consultation should be just that, the forum (meeting) to determine what applications are required for a complete application. For clarification, no technical studies should be required as part of the Pre-consultation meeting. Greater clarification on the pre-con stage and the time to schedule this would be appreciated. The CPPS could create a de facto “mini site plan” process for small projects. Eliminating mandatory pre-consultation (or making it voluntary), accepting applications with only essential information, and waiving extensive studies for gentle-density proposals is encouraged recognizing that these projects should be exempt.	Comment noted. Pre-consultation is critical for the City to meet the statutory timeline and to define complete application requirements. The City is reviewing other municipal CPPSs that have split Class 2 and Class 3 permits further into Minor and Major applications in terms of fees and process requirements.
169.	Ryan Mounsey (Urban Insights)	General	09-12-2025	If Waterloo proceeds with its CPPS initiative, the project should be paused after the first year to allow Council, staff, and stakeholders to review results, identify gaps, and make data-driven adjustments. Most critically, if the City is unable to consistently meet the statutory 45-day	The project will be monitored and reported on and process improvements made as appropriate. There is no ability to pause the By-law once it is in effect, rather Council can choose to repeal the By-law and replace it with the existing processes should they so choose.

#	Commenter	Area of Comments	Date	Comments	Response
				decision timeline, then consideration should be given to adopting an alternative, less burdensome process that more effectively reflects provincial legislation and the Province’s mandate to accelerate housing delivery	
170.	Ryan Mounsey (Urban Insights)	General	09-12-2025	CPPS documentation suggests an additional step may still follow permit issuance: a requirement to enter into an agreement with the City, registered on title, to address the permit conditions. This will most likely add additional time to the process and extend past the 45-day timeline. Waterloo should clarify the implementation steps after a CPPS permit is granted. Ideally, if conditions of approval are imposed in the permit, those conditions should be cleared administratively (by staff) without requiring a separate registered agreement in most cases. Another approach is to have a standard form CPPS agreement template agreed upon in advance, so that little negotiation is needed and signing can occur almost immediately with the permit.	One benefit of CPPS is the ability to apply conditions of approval which may necessitate a development agreement not unlike the current Site Plan Approval process. We are working with our Legal Services department to create a template agreement that can be used. As noted, the 45-day statutory timeline is the timeline for a decision to be rendered after which an applicant can appeal to the Ontario Land Tribunal for lack of decision.
171.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Establishing a pilot project is appropriate, but a two-year pilot period is excessive and risks embedding inefficiencies before they are fully understood. If the CPPS is to move forward, a one-year pilot is more reasonable and should be accompanied by interim performance reviews.	With CPPS being a new tool that is being implemented it will be monitored on a yearly basis and modification/updates made as appropriate.
172.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Developers and builders need clarity on how much a CPPS permit will cost, yet the City has not released any schedule of application fees for the new system. The industry is highly sensitive to upfront fees, especially for small and mid-scale projects where cash flow is tight. It is strongly recommended that Waterloo adopt a sliding scale or tiered fee structure, where truly small projects pay minimal fees, and larger developments pay more commensurately.	The schedule of fees is still being worked on and will be released alongside the final By-law, similar to the approach taken by other communities with CPPS. The City is reviewing other municipal CPPSs that have split Class 2 and Class 3 permits further into Minor and Major applications in terms of fees and process requirements.
173.	Ryan Mounsey (Urban Insights)	General	09-12-2025	If a property owner has already submitted (or soon will submit) a rezoning or site plan under the current system, what happens once the CPPS by-law is enacted? Does that application continue under the old rules, or is it forced to convert into a CPPS application? Best practice in such major system changes is to include clear ‘grandfathering’ provisions. For instance, any project that has submitted a pre-consultation meeting, or a complete application (OPA, rezoning, minor variance, site plan, etc.) 60 days submitted before the CPPS comes into force could be allowed to proceed under the pre-existing process. Alternatively, applicants could be given the option to switch to CPPS if they see a benefit.	The draft By-law has Transition Provisions outlined in Section 1A.9. Active Official Plan and Zoning By-law Amendments will be able to continue under the existing OPA/ZBA process. Applicants in the current process(es) have the ability to switch to the CPPS process if they should so desire.
174.	Ryan Mounsey (Urban Insights)	General	09-12-2025	If not subject to site plan application, allow minor variance application through existing system which is faster than the 45 day review timeline.	CPPS would replace Minor Variance in the CPPS area; there is not an ability to have both processes.
175.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Affordable Units. Leave affordable units subject to current legislation. Any additional community benefit is an overreach without proper economic / financial analysis.	O. Reg. 173/16 allows a municipality to establish conditions for the provision of “facilities, services and matters” in exchange for a specified height or density of development. The O. Reg. goes further to identify that where a condition is required, the by-law establish a proportional relationship between the quantity or monetary value of the facilities, services and matters that may be required and the height or density of development that may be

#	Commenter	Area of Comments	Date	Comments	Response
					allowed. The legislation does not limit the geographic scope of where facilities, services and matters can be applied to. NBLC has undertaken a Financial and Market Analysis.
176.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Parking - Maintain Bill 185 Parking exemption within designated MTSAs.	This has already been reflected in the second draft.
177.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Fees - Establish a tiered application fee framework recognizing applications are to be expedited involving less time. Application fees should be substantially less than the current fees. Pause the CPPS process until fees have been identified.	The CPPS cannot be paused as it is a Federal Housing Accelerator Fund grant initiative. Application fees will be released with the final By-law.
178.	Ryan Mounsey (Urban Insights)	General	09-12-2025	Pilot Monitoring Program. To reduce the 2-year review period to 1-year.	The program will be monitored on an annual basis.
179.	Ryan Mounsey (Urban Insights)	General	09-12-2025	OPA. If an OPA is required, identify this at Preconsultation stage and expedite the OPA process with an accompanying CPPS bylaw amendment with the OPA application. NOTE: The OPA will be subject to all Provincial Legislation and not subject to the CPPS. The minimum complete application study requirements of the OPA should prevail over the CPPS.	Yes, if an OPA is required it would be flagged at the pre-consultation meeting, which underscores the importance of pre-consultation with a CPPS.
180.	Laura Jamieson (Zelinka Priamo) on behalf of Choice Properties	450 Erb St W	09-12-2025	Section 1B.13.3 states that “The City may impose the following types of conditions as a condition of approval...” and goes on to list 19 possible types of conditions. We continue to seek clarification and rationale for the appropriateness of certain conditions identified. The listed conditions are more prescriptive and beyond the scope of those listed in Section 12.2.15.12 of the City of Waterloo Official Plan. In our submission, the conditions which may be imposed should be revised to conform with and implement the Official Plan.	Section 12.2.15.12 - Development Permit System in the City's current Official Plan is being updated to Section 12.2.17(14)-Community Planning Permit System through Official Plan Amendment 58 (subject to Ministerial approval). Section 1B.13.3 conforms to OPA 58.
181.	Laura Jamieson (Zelinka Priamo) on behalf of Choice Properties	450 Erb St W	09-12-2025	Guideline 3.1.3 states “Design and orient buildings with active facades close to the street to promote pedestrian activity and animate the public realm. Locate active uses at grade, provide transparent windows along the street frontage and place building entrances along public sidewalks.” We reiterate our suggestion to add “where appropriate” at the beginning of this guideline. The intent is to incorporate flexibility and account for site specific considerations, as regulations are sufficiently addressed within the CPP By-law	Comment noted.
182.	Laura Jamieson (Zelinka Priamo) on behalf of Choice Properties	450 Erb St W	09-12-2025	Guideline 3.7.4 states “Enhance or extend existing and planned corridors such as main streets (retail streets), neighbourhood connector streets and active transportation routes.” We continue to seek clarification as to the intent and application of this guideline. We suggest providing examples to support the guideline’s intent and purpose.	The Region provided comments on the first draft guidelines which requested revision to align with the Region’s Context Sensitive Corridor Design Guidelines terminology noting that: •The Erb Street corridor is classified as “Neighbour Connector – Avenue” and “Neighbourhood Connector – Main Street”. • “Neighbourhood Connector- Avenues” are roads designed to support active transportation (including walking and cycling) and transit. They are good candidates for transit priority lanes. While prioritizing vehicular traffic, they still need to support a mix of adjacent land uses that typically require individual access to and from the road. • “Neighbourhood Connector - Main Streets” are supportive of and prioritize active transportation and transit. They are typically located within the established urban areas and often can be considered special character streets.

#	Commenter	Area of Comments	Date	Comments	Response
183.	Alex Vandersluis (Auburn Developments)	General	09-12-2025	Request clarity in the by-law about the 45-day approval period. The suggestion that the 45-day approval timeline would not start until 1st comments are circulated back to the applicant is unacceptable. The O. Reg. which empowers the City to implement the CPPS is clear that the 45-day appeal clock starts at submission of a fee and a complete application (O. Reg. 173/16 S.12).	Comment noted and modification will be reflected in the final By-law.
184.	Alex Vandersluis (Auburn Developments)	General	09-12-2025	Concern that the permissions of O. Reg 173/16 are being introduced instead of the framework of the modern Planning Act and clear direction to municipalities related to approvals for housing development in Ontario.	Comment noted. CPPS is regulated through section 70.2 of the Planning Act and O. Reg. 173/16.
185.	Alex Vandersluis (Auburn Developments)	General	09-12-2025	The types of proposals the City will see in the CPPS area are complex, tall buildings with many variable factors from site to site. We do not think that the CPPS is the right tool to regulate development for that exact reason.	Comment noted. Other mid-sized cities that have implemented CPPS include: Guelph (Stone Road and Edinburgh Strategic Growth Area), and Brampton (Main Street North). In addition, Burlington has received Provincial approval on the CPPS enabling policies and approval in principle on the CPP by-law for 3 MTSA's, while those in progress include: Waterloo, Guelph (downtown), Oakville (Midtown and Bronte Village), Barrie (urban growth centre), Peterborough (city wide); Brant County (County-wide); Caledon (Planned Bolton South GO MTSA); Ottawa (Kanata North Economic District). The City has been leveraging lessons learned from those processes.
186.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	Please clarify how pre-consultation applications are intended to proceed under the Draft CPPS By-law and related process. We assume proponents are not expected to submit pre-consultation requests to relevant agencies and schedule additional pre-consultation meetings	The intent is to have one pre-consultation meeting which has both staff and any relevant agencies, and not separate meetings.
187.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	The Draft CPPS By-law does not appear to contain timelines associated with scheduling pre-consultation meetings. Establishing a timeline for this will reinforce a commitment to timely review and processing of Community Planning Permits.	Comment noted.
188.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	Please confirm whether applications will be subject to the 30-day timeline for review to determine completeness. We suggest the timeline for deeming applications complete be included in the Draft CPPS By-law.	The Planning Act section 34 (10.4) – Response re Completeness of Application states that, “Within 30 days after the person or public body that makes the application for an amendment to a by-law pays any fee under section 69, the council shall notify the person or public body that the information and material required under subsections (10.1) and (10.2), if any, have been provided, or that they have not been provided, as the case may be.” A permit application is not an amendment to a by-law.
189.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	Request further clarification regarding: 1) Process through which a permit may be determined to be a significant concern as referenced in Figure 1 - what considerations determine the level of 'concern'; 2) How the By-law can be revised to provide appropriate guidance on determining whether an application is a significant concern; and 3) Further details on the scope and nature of a Class 3 permit.	Given that this is a new tool and flexibility to support implementation is desired, criteria have not been established in the Draft CPP By-law for provision 1B.3.5 nor 1B.3.4 (applicant's ability to “bump” up an application to Council). The project team will consider defining criteria in the implementation materials to provide some predictability for both 1B.3.4 and 1B.3.5. Council is the approval authority for a Class 3 permit.
190.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	We request that staff clarify the legislative basis upon which the Community Contribution Fee as referenced in Section 1B.15 of the Draft CPPS By-law may be applied to lands subject to the By-law. Should there be no legislative basis for the imposition of the fee, we assert the Community Contribution Fee, and all references to the same within the By-law, be removed.	CPPS legislation O. Reg. 173/16 permits municipalities to require facilities, services and matters. The facilities, services and matters framework is outlined in section 1B.15 of the by-law. We note that Guelph's approved and in effect CPPS includes a similar Complete Community Contribution Fee. Development is subject to the fee equivalent to that which is provided in Community Benefits Charge By-law 2022-072.

#	Commenter	Area of Comments	Date	Comments	Response
191.	Trevor Hawkins (MHBC) on behalf of Copper Bay Homes	Uptown	10-03-2025	Request clarification on why the CPPS By-law is being advanced ahead of the conclusion of the OP Review other than timelines associated with a HAF application/grant. The final CPPS By-law and associated Urban Design Guidelines will be advanced for approval to Council in March 2026. While OPA 58 may have received Ministerial Approval by that time, Phase 2 of the OP Review will almost certainly not have concluded. The outcome of Phase 2 of the OP Review will have implications for the Uptown/Erb Street Corridor CPPS Area, and as such amendments to the CPPS By-law will be required to implement the second phase of the OP Review.	As noted, this initiative is one of nine the City is required to advance under its Housing Accelerator Fund grant agreement. The initiative was also identified in the City's 2023 Affordable Housing Strategy. Any changes as a result of Official Plan Review Phase 2 will be made by way of a future amendment to the CPP By-law.

Waterloo Community Planning Permit System Second Draft Community Planning Permit By-law and Urban Design Guidelines
Summary of Agency and Staff Comments and Responses

NOTES:

- 1. Responses to the public and development industry engagement sessions were refined or additional information added where appropriate such as considering the findings from NBLC’s Financial and Market Analysis.
- 2. Response comments were generated prior to the decision to scope the Community Planning Permit System initiative boundary to the Erb Corridor located outside of the Uptown Protected Major Transit Station Areas.

ACRONYMNS:

- BPH = Bedrooms Per Hectare
- CPPS = Community Planning Permit System
- CPP = Community Planning Permit
- FSM = Facilities, Services and Matters
- IZ = Inclusionary Zoning
- Laurel/Clair SPA = Laurel/Clair Floodplain Special Policy Area
- OP = Official Plan
- OPA = Official Plan Amendment
- O.REG. = Ontario Regulation
- ZBL = Zoning By-law
- ZBA = Zoning By-law Amendment
- UDG = Urban Design Guidelines
- (P)MTSA = (Protected) Major Transit Station Area

#	Commenter	Area of Comment	Date	Comments	Response
1.	Waterloo Region District School Board	General	07-4-2025	How is the GRCA flood plain and development restrictions incorporated into this plan? Laurel Creek runs right through Uptown Waterloo.	The CPP By-law has carried over the existing floodplain designations, regulations and criteria from the Zoning By-law so they remain the same.
2.	Environmental Planning (City staff)	General	07-11-2025	Identified several formatting issues, suggested removing Figure 2 and relying on Schedule A2, removed a few provisions that were not relevant.	Noted and will be addressed in the final By-law.
3.	Municipal Heritage Committee	General	07-22-2025	How does the CPPS relate to heritage?	Portion of MacGregor Albert Heritage Conservation District is located in the study area. Took the existing RC1 Zone in the Zoning By-law and moved it over into the CPPS. The residential conservation and Uptown precinct are similar to what was existing in the Zoning By-law.
				Why is the heritage conservation district not included in the dotted line area? Would this create a conflict between heritage conservation policies and PMTSA policies?	The study area is following the outline of the Major Transit Station Area. It is very consistent and the main change is removal of parking requirements. This change won't affect heritage processes/approvals. Applicants are required to get heritage approvals before planning permits.
				Concerns with parking. Where will people park and is it realistic to remove parking requirements?	The municipality cannot mandate parking in PMTSAs due to provincial legislation. Developers may still provide parking if they see fit.
				Concerns with visual aesthetics, an instance being Barrel Yards blocking the view of heritage properties.	Sightlines are addressed in guidelines and will be considered when reviewing applications. Guidelines will be used to support decision-making.
				Question on federal funding, whether this is just a planning tool or an electronic permitting system/platform?	It is a planning tool to allow more flexibility than a Zoning By-law. It is still a land use planning framework. However, staff will be moving toward that direction.
				What is the impact CPPS will have on designated heritage properties? Do the design guidelines consider properties that are close to heritage properties?	It will not change any legislative heritage requirements. The Official Plan is not changing as a result of CPPS implementation and the OP requires an Heritage Impact Assessment (HIA) where heritage is concerned.
				Mentioned example of Bank of Montreal at King St, concerned that CPPS will impact what will be built there. Concerned that CPPS gives staff power to vary what will be reviewed, without any public comment.	Whatever is in the existing Zoning By-law will be brought over to the CPPS system. The urban design guidelines would only provide directions on streetscaping, layout, and detailed design. Most heights are still regulated in the OP. If a developer wants to go above the height requirement, an OPA is still required. The variation thresholds are just replacing the Minor Variance process, but does not mean automatic approval.
				Which staff will make decisions?	The Director of Planning or someone he delegates.
4.	Region of Waterloo (Affordable Housing Development)	555 Beechwood	07-29-2025	Request that the property at 555 Beechwood Drive, which is on the Erb St Corridor, either be removed from the study area or that any transition provisions will allow the development at 555 Beechwood to move ahead as planned under the current planning approval process.	Request granted. The final by-law transition provisions will reflect the project's ability to continue under the current planning approval process given the existing affordable housing agreement in place.
5.	Waterloo Catholic District School Board	General	08-27-2025	The process diagram identifies that "Application is circulated to Department and Agencies (as applicable)". We are interested in understanding the nature and scope of this circulation, including opportunities to share comments and conditions and any modifications to our current development review processes that may be required to align with this new system.	Circulation to agencies will be very similar to the existing circulation process for Site Plan and Zoning By-law Amendments. The CPPS will require a pre-consultation meeting where statutory agencies will have the opportunity to identify any requirements of development to be considered as part of a complete application. Once an application is deemed complete, agencies will have an opportunity to comment albeit in a streamlined timeline. City staff are currently working on the process flow.
				Specific comments for staff's consideration: 1B.2.1 d) Effective June 6, 2025, Section 41 (1.1) of the Planning Act was amended to exempt placement of portables on school sites regardless of school age. 1B.2.1 Consistent with the City's Site Plan Control By-law (1999-183) school sites should remain exempt under this by-law (Section 4 b)).	Comment 1B.2.1 d) – Comment noted. This Draft of the CPP By-law was completed prior to this Bill receiving Royal Assent. It is also noted that O. Reg. 173/16 was not modified on June 6, 2025 and that a CPPS process addresses zoning, minor variance and site plan matters. We will consider how to incorporate this comment into the Final CPP By-law. Comment 1B.2.1 – See response above. Comment noted and will be taken into

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				1B.13.3 We suggest that language be clarified that the City may impose the categories of conditions listed, but also clearly articulate that the City may also impose conditions on behalf of agencies, such as the school boards. 1B.17.4 - 1B17.6 We ask that the city provide regular notice to the school boards of the lapsing and extension of Provisional Approvals to ensure that up to date information is available on prospective development. Definitions: The definition of Public School should not be exclusive to the English language school boards, the French Language school boards, Mon Avenir and Viamonde, should be afforded the same rights as publicly funded English school boards.	consideration for the final By-law. 1B.13.3 - Comment noted and will be taken into consideration for the final By-law. 1B.17.4 - 1B17.6 – Comment noted. Definitions: Comment noted and has been forwarded to the Development Planning team for consideration as these definitions were carried over from the City's existing Zoning By-law.
6.	Ministry of Transportation Ontario	General	09-10-2025	The areas within the Uptown Waterloo Primary Node and Erb Street Corridor are located beyond MTO's Permit Control Area (PCA), therefore MTO has no requirements or comments on this initiative.	Comment noted.
7.	Engineering Services (Landscape Architecture, City staff)	General General	09-10-2025	The 45-day review window suggests that there would only be one submission anticipated/required prior to a decision. Is that a fair assumption? If so, is it expected that the preconsultation/complete submission stage is where the majority of comments related to the application are to be resolved? I expect that provisional and conditional approvals (in lieu of a resubmission) may also be a mechanism to ensure additional information/details/requirements are provided/met.	Correct. We only anticipate one submission and one chance for a review and to get comments and identify any conditions due to the compressed decision timelines. The pre-consultation phase would be where the requirements that need to be met for a CPP complete application would be identified for the applicant. The applicant would then put together an application, if deemed complete by Planning staff it would then be circulated to applicable staff and agencies for comment. If there were outstanding issues, you're correct that a provisional approval might be one option, there might also be opportunity to resolve the issue within the timelines, the application could be denied, or perhaps the applicant might decide to pull the application.
8.	Economic Development (City staff)	N/A	09-12-2025	By-law: -Suggestions about existing zoning regulations such as ground floor height of mixed-use buildings, opportunities for patio space on the property at ground floor, and consideration of a microbrewery as a permitted use in MUCC and C precincts. - Suggest the term Discretionary Use should be defined.	-These standards were carried over from the existing Zoning By-law which does not have a patio space requirement although there are some general regulations relating to patios, so as long as they are meeting these, they are permitted. Microbreweries are permitted in Employment zones. -The term is defined in section 1B.4 of the By-law.
				Urban Design Guidelines: -Identified some formatting and spelling issues. - Questions about the Sidewalk/Pedestrian Clearway Zone recommended clearway, and, the Landscape and Site Furnishing Zone and whether additional street furniture also include streetscape shading elements?	Comments noted. With Erb Street being a Regional Arterial Road, wider sidewalks are encouraged.
				UDG Public Art Section: 1. Reminder to engage and consult with the City's Culture Program Specialist on any public art and offer to provide updated pictures. 3. Suggestion to include definition of Public Art which should not include murals and clarification request about what "public art exhibits" and "programmed spaces in public spaces" means. 5. In point 7, concern that public art is referred to as a design feature. 6. A note should be added about welcoming, accessible, and projects of appropriate scale added to this document.	Comments noted and yes the City's Culture Program Specialist will be engaged on any public art, and we will reach out for updated Public Art images.
9.	Transportation Services (City staff)	General	09-17-2025	Several clarification comments and questions identified on the Urban Design Guidelines. Question on notice requirements for Class 2 and 3	Comments noted and will be taken into consideration for the final By-law. There are no legislated notice requirements for permits under a CPPS. However, municipalities may

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				permits: It's noted that signage is required on site for these applications in section 1B.12; do we differ to the planning act to speak to the timing (i.e. must be up for 10 days) requirements for the signage? Figure 1 is missing notification requirements for Class 2.	require notification including on-site signage as is proposed in the Draft By-law. It is up to individual municipalities to define detailed implementation including timing. At this point in time, the City is considering consistency with existing requirements under the Planning Act. Figure 1 will be rectified in the final By-law.
10.	Development Planning (City staff)	General	Various	Comments, suggestions and questions on various aspects of the by-law.	Comments noted and will be reflected in the final By-law.
11.	Region of Waterloo	General	10-20-2025	By-law: 1. Concern about inconsistent use of “Applicable Agency” and their relationship to the phrase inclusive of the Region of Waterloo”. Recommend either: a) Define the term “applicable agency/agencies” in Section 2 (Definitions) and ensure it explicitly includes the Region; or b) Standardize all references within the by-law by consistently using either “applicable agency” or “applicable agencies” and always include the phrase “inclusive of the Region of Waterloo” for clarity. 2. Request that all permit applications affecting Regional service areas be circulated during the initial implementation phase of the new by-law. Suggested Revision: “1B.9.2 The CITY shall require that pre-consultation with applicable agencies occurs prior to the submission of Community Planning Permit application, where appropriate. For applications affecting matters of Regional interest, (including but not limited to Regional Roads, transit services, utilities or other infrastructure), pre-consultation with the Region of Waterloo will be required.” 3. Section 1B.9.3 - Technical Study Requirements -Suggest revision to reference both the City’s OP and the Regional OP (or use the broader term "all applicable Official Plans") as the basis for determining the required extent of issues for technical studies. 4. Section 1B.9.2 - Natural Hazards Section 1B.9.4 should be revised to remove the reference to the Region of Waterloo concerning natural hazard technical studies as the Region does not have jurisdiction or technical expertise over natural hazards (e.g., flooding, erosion, steep slopes). These matters are typically addressed by the Grand River Conservation Authority and City staff. Urban Design Guidelines: The revised guidelines have appropriately addressed all the Region’s comments on the initial draft. We appreciate the City’s efforts to align with Regional transportation planning objectives and for requiring compliance with the Region’s Corridor Design Guidelines for roads within the Region’s jurisdiction.	Comments noted and will be reflected in the final By-law.
12.	Waterloo Economic Development Advisory Committee	General	10-21-2025	1. Can understand why Uptown chosen but why was the Erb Corridor chosen? 2.Erb Street is a Regional Road, are there any hurdles or access issues?	1. The Erb Corridor was chosen as it is also a strategic growth area since 2003, and the City is looking to spur missing middle housing and development along this important corridor. 2. There are no differences from the practices today where the Region has control over the streetscape, but the City works with the Region on implementing a shared vision.

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				3. Impact of downloading of Regional responsibilities will it have an impact? 4. Starting to see development along the corridor. 5. Streamlining process is a good thing. What communities have CPPS and any lessons learned?	3. Certain responsibilities have been downloaded to the City such as the Regional Official Plan and noise studies however the Region as a commenting agency will continue to provide comments and identify conditions for anything in the Regional right-of-way. 4. Comment noted. 5. Mid-sized cities that have implemented CPPS include: Guelph (Stone Road and Edinburgh Strategic Growth Area), and Brampton (Main Street North). In addition, Burlington has received Provincial approval on the CPPS enabling policies and approval in principle on the CPP by-law for 3 MTSAs, while those in progress include: Waterloo, Guelph (downtown), Oakville (Midtown and Bronte Village), Barrie (urban growth centre), Peterborough (city wide); Brant County (County-wide); Caledon (Planned Bolton South GO MTSA); Ottawa (Kanata North Economic District). The City has been leveraging lessons learned from those processes.