MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

June 17, 2026

Madison Headrick
Development Planner
City of Waterloo
100 Regina Street South
Waterloo, ON N2J 4A8

Dear Madison:

RE: 585 Laurelwood Drive – Draft Plan of Condominium (Vacant Land) – Submission #4
OUR FILE: 22403A

On behalf of our client, LMRW GP Inc., we are pleased to submit the enclosed resubmission package for the Draft Plan of Condominium (Vacant Land) for the lands municipally known as 585 Laurelwood Drive, in the City of Waterloo (the 'subject lands').

The proposed Draft Plan of Condominium application is required to facilitate the creation of units for the development of the subject lands. A Site Plan Application has been endorsed to the Director of Planning on April 13, 2026 for the development Phase 1 (Building A) into a 12-storey multiple residential building, which is shown as Unit 1 on the Draft Plan of Condominium.

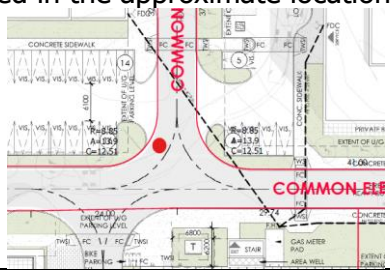
The Draft Plan of Condominium Application was submitted to the City for review on February 20, 2026 and subsequently deemed complete on March 10, 2026. City staff provided comments dated May 22, 2026. The purpose of this letter is to provide responses to the comment record and indicate the necessary revisions made to the submission materials.

We request a meeting with City and Regional staff to discuss our approach and determine next steps to be considered for Draft Plan Approval.

Comment	Response
City of Waterloo	
The Lands are located on the south side of Laurelwood Drive, across from Creekside Drive. The Lands are designated Built Up Area in the Region Official Plan and are designated Mixed-Use Medium High Density Residential and Open Space in Schedule A of the City Official Plan. The Lands designated Open Space have been shown outside of the limits of the proposed Condominium Plan. The Lands are zoned Residential Mixed-Use 40 (RMU-40) and Conservation (OS3) in Zoning By -law 2018-050. The portion of the Lands zoned Conservation (OS3) is shown mostly outside of the limits of the proposed Condominium Plan.	Acknowledged.

The applicant is proposing a Vacant Land Plan of Condominium that contains 4 vacant land units, that are considered to be lots under the City's Zoning By-law, and common element areas to be shared between all units that consist of a common element road, servicing, and amenity areas. Each of the four units is proposed to be developed with a 12-storey multi-unit residential building. An active site plan application is currently being reviewed by City staff for Building A, which is proposed to be built within Unit 1 (SP-24-14).	Acknowledged. The Site Plan Application for the Phase 1 building (in Unit 1 of the Draft Plan) was endorsed to the Director of Planning on April 13, 2026.
The Provincial Planning Statement (PPS) provides high-level policy direction on matters of provincial interest related to land use planning and development. The policies direct planning authorities to provide a range and mix of housing options and densities to meet the projected needs of current and future residents.	Acknowledged. The proposal is consistent with the Provincial Policy Statement.
The subject property is within the Delineated Built-Up Area on Map 2 of the Regional Official Plan (ROP). In staff's opinion, the proposed plan of condominium conforms to the ROP as it is located in the Delineated Built-Up Area.	Acknowledged.
Zoning deficiencies related to the placement of Building A with respect to the proposed unit boundaries, which are considered to be lot lines per the regulations in the Zoning By-law, will need to be addressed prior to Registration. A condition will be included that requires that the appropriate zoning relief for Building A be obtained prior to registration. If appropriate zoning relief is not obtained in a way that assures zoning compliance, modifications to the Plan of Condominium and/or the Site Plan will be required at the cost of the applicant.	At this this time, we understand based on a preliminary zoning review and discussions with City staff that zoning deficiencies for Tower A (Unit 1) are related to tower stepbacks on the flankage side that result from the common element road. Please refer to the Zoning Statistics Chart included on the Master Overlay Plan. A Minor Variance application will be required as a condition of Draft Approval for Tower A. Zoning compliance for Tower B, C, and D is to be reviewed as a component of future Site Plan Approval processes and Minor Variance applications to be advanced at that time.
Signatures from the owner and surveyor on the draft plan of condominium are required prior to Draft Approval.	Acknowledged. Draft Plan to be signed upon confirmation that the City is satisfied with the plan.
Please confirm and provide rationale as to why the unit boundaries do not match the zone boundary. It is the City's preference that the Unit boundaries align with the zone boundary. If the boundaries are not aligned, a condition will be included that requires the installation of a chain link fence as per City standards to delineate the OS3 zone to protect against encroachment.	Please refer to the revised Draft Plan of Condominium. The unit boundaries have been revised and follow the zoning boundary between the RMU-40 and OS3 zone. As a result, we request no requirement / condition for a chain link fence. Through the previous Plan of Subdivision process, a significant landscaped tree buffer was planted along the slope between the RMU and OS zones, which is intended to remain. There is no intention for encroachment into the OS3 zone beyond the naturalized buffer, therefore, an additional fence is not required.

A condition will be included that requires a solicitor's certification confirming that the two properties within the Plan of Condominium have been merged on title prior to registration.	Acknowledged.
Please label and show the road width of Creekside Drive on the Draft Plan.	Please refer to revised Draft Plan.
Given the existing topography, please give consideration to grading the Lands in a manner that minimizes the need for, and height of, retaining walls to the extent possible.	Acknowledged and to be considered through the concurrent Site Plan Approval processes.
Submit a Master Site Plan Overlay with the vacant land plan of condominium to support the lot lines being requested. Please demonstrate how these unique lot lines are functional and appropriate. In addition, a Zoning Compliance Chart for **each unit** will be required to support the Master Site Plan. Each unit must demonstrate **individual** compliance with the Zoning By-law (including but not limited to parking, setbacks, landscaped open space, and density).	Please refer to the Master Overlay Plan submitted with the application, which includes the Zoning Compliance Chart for Tower A. It should be noted that only Tower A (in Unit 1) is subject to Site Plan Approval and construction at this time and future Site Plan Applications will be advanced for Towers B, C, and D. The building designs and site layouts are subject to change at that time through review of future Site Plan Applications and it is acknowledged that all buildings must be zoning compliant at that time. We request that a Minor Variance be a condition of Draft Approval for each unit to be addressed through the Site Plan Approval processes for each building.
The entire limits of 585 Laurelwood Drive, including the environmental lands (noted currently as 'additional lands owned by applicant') should be included within the limits of the Plan of Condominium. Please refer to comments provided by Environmental Planning regarding conveyance of these environmental lands. If the lands are not to be included within the limits of the Draft Plan or conveyed to the City, what are the owner's plans for these lands and rationale for not conveying these lands to the City?	The environmental lands are not intended to form part of condominium ownership and are intentionally excluded from the Draft Plan limits. At this time, the environmental lands are intended to remain under ownership of LMRW GP Inc. Future consideration may be given to the conveyance of the environmental lands through ongoing discussion with the City, however, will not form part of this approval.
Please submit an addendum letter to the Planning Justification Report which details the previous parkland dedication provided through the approval of the subdivision, including any densities previously assumed and approved for the Lands.	The Plan of Subdivision Condition Clearance Letter dated May 7, 2004 indicates that the 5% parkland dedication requirement was satisfied through the registration of Plan of Subdivision 58M-145.
Consider including the Central Amenity Area within the Common Elements, rather than within Unit 2. This will allow for this common amenity area to be shared by all Units, and will negate the need for complex cost sharing agreements and easements.	The Central Amenity Area cannot be added to the common elements, as there is underground parking located below. The Central Amenity Area will remain within Unit 2 and managed through cost-sharing agreements and easements.
Please confirm if the below highlighted lot line can be adjusted to reflect a logical and simplified future lot pattern. If the lot lines being requested support a specific site plan, then a Master Site Plan should be	Please refer to the Master Overlay Plan for additional context. The highlighted lot line follows the extend of the sidewalk provided to the parking area for Unit 4.

submitted to support the unique lot shapes. Please demonstrate how all lot lines proposed conform to zoning regulations, including as it relates to building placement. More regularly configured lot lines will minimize the need to amend or modify the Plan Condominium in the future should the Master Site Plan change.	
Please confirm if the below highlighted portion of the common element road can be modified to reflect a more logical and simplified configuration. Please confirm how vehicles travelling in both directions will navigate this corner, and how this common element road will be able to support large vehicles required to navigate the site (e.g., waste collection, deliveries, snow clearing etc.).	Please refer to the Master Overlay Plan for additional context. The lot configuration takes into consideration the boulevard and transformer for Unit 4.
Please confirm how the below intersection will function. Indicate what signs will be installed for traffic control.	The intersection will be reviewed in detail through future Site Plan Applications for Towers B, C and D. It is anticipated that a stop sign will be required in the approximate location below. 
The common element road comes to an abrupt end, and transitions into a driveway within Unit 2. This creates complexities as it relates to maintenance and snow clearing in this area. Consider extending the common elements to include the turning circle at the end of the common element road, instead of within Unit 2. Including the entirety of the road as a common element, rather than a portion thereof, will more accurately reflect the use of the road by all Units and will eliminate the need for complex cost sharing agreements and easements that would be required to access the parking area in Unit 4.	The bulb at the end of the common element road is not intended to be included in the common elements, as there is underground parking below at this location. The bulb will be included in cost sharing agreements and easements.
Also, consider reconfiguring the road to include a full bulb rather than the incomplete bulb, to better accommodate large vehicles turning movements.	The design of the bulb can be reviewed at the time of the Site Plan Application for the Tower B. However, there is limited space to accommodate a full turning circle. The Master Overlay Plan demonstrates sufficient space for truck turning movements as designed.
Please provide a draft easement plan identifying approximately where each easement will be required for access and maintenance. The plan as submitted will require multiple easements to function legally. Please also provide a registration memorandum to detail the agreements required and the order of registration of all easements and agreements required to register the Condominium Plan.	Please include a draft Easement Plan and Registration Memorandum as a condition of Draft Approval to be completed as part of the registration.

The transformer located in the common elements will require an easement for the line connecting the electric room in Unit 3 to the transformer. As all other Units include a transformer within each of the unit boundaries, please consider relocating this transformer within Unit 3.	Acknowledged. We propose a blanket easement for the transformers as a condition of Draft Approval.
The width of the common element road is limited to 6.4 metres in some areas. Please provide a preliminary cross section depicting what elements are included within the common elements road to confirm that the width shown is appropriate. Consider including sidewalks and layby areas within the common elements to provide consistency along the right-of-way, to simplify maintenance, and to reduce the number of easements and cost sharing agreements required.	Please refer to the Master Overlay Plan for additional context.
The City requires a road traffic noise study for Laurelwood Drive and a stationary noise study that evaluates the impact of the Laurelwood Commons commercial plaza on the corner of Laurelwood Drive and Erbsville Road and the Court at Laurelwood Retirement Residence located at 605 Laurelwood Drive. Please refer to the Noise Study Terms of Reference on the City's Website. Given that the Region has also requested a traffic noise study, you may wish to submit one study that evaluates both the City's requirements and the Region's requirements.	Acknowledged. Please include a Noise Study as a condition of Draft Approval to be completed prior to registration. It should be noted that a Noise Study was completed as part of the Plan of Subdivision registration WR35338 for road traffic.
Consider the below Vand Land Condominium plan concept as an alternative to what is proposed: • Units only encompass the building and parking, therefore units would not meet the definition of a lot in the Zoning By-law and would not result in zoning deficiencies related to unit boundaries. • Required parking can be shown as "Unit X Area X" on the surface. A strata plan would include the underground parking within the associated unit for the building. • The remainder of the site would be common elements, which includes the common element road, landscaping, amenity spaces, sidewalks, etc. This would eliminate the need for many of the easements and reduce the complexity of the cost-sharing agreements. • A Master Site Plan would be required to be endorsed prior to condominium draft approval or registration.	While we acknowledge the design suggestion, the Draft Plan has been designed as proposed due to the underground parking layout. The suggested design is not feasible given the underground parking layout and since future Site Plan Applications will be required that are likely to change the location / design of buildings within each unit. We acknowledge that easements and cost-sharing and maintenance agreements as well as demonstrating zoning compliance will be required under our proposed design. Minor refinements have been made to the Draft Plan of Condominium to address other matters contained in the Comment Record.
On December 2, 2024, City Council adopted Official Plan Amendment 58 ("OPA 58"), which formed Phase 1 of the Official Plan Review. OPA 58 includes extensive modifications and updates to the Official Plan's policies and schedules. OPA 58 was reviewed and approved by the Ministry of Municipal Affairs and Housing (MMAH), and came into *effect* on December	Acknowledged.

17, 2025. In its Decision, MMAH made 14 modifications to the text of OPA 58. None of the modifications have direct implications on the Lands.	
The subject lands are designated 'Medium High Rise Residential' and 'Open Space', which permits a maximum of 12 storeys and aligns with the Applicant's proposed built form. Although the Applicant's cover letter was prepared before OPA 58 came into *effect,* it states that the lands are designated 'Mixed-Use Medium Density Residential' and also 'Mixed-Use High Density Residential' both of which are incorrect under the previous Official Plan. Prior to OPA 58 the Lands were designated 'Mixed-Use Medium High Density Residential'.	Acknowledged.
The City strongly recommends that the environmental lands be conveyed to the City prior to registration of the plan. *Staff* will continue to pursue transfer of the environmental lands from private to municipal ownership. It is the City's long-standing practice to secure environmental lands in public ownership. Through the Environmental Lands Acquisition and Maintenance Policy (1999) it was recognized that environmental lands should be publicly owned to the greatest extent possible to ensure the protection, preservation, monitoring, and maintenance of such lands for future generations. Official Plan policy 8.2.2(19) supports the conveyance of the OS3 lands to the City as it would help to protect the Natural System.	The environmental lands are intended to stay under ownership of LMWR GP Inc. at this time. However, consideration to conveyance of the lands to the City will be considered through ongoing discussions as a separate matter from this approval.
Ensure conformance with 7.1.2.4. Shared Services can be maintained throughout the development. Where services are shared between buildings located on separate properties, an alternative solution application through building standards with a shared private servicing agreement may be an acceptable design approach, where initial approval is received from the Director of Engineering and Chief Building Official to proceed with this type of development.	Acknowledged. Please refer to the Servicing Overlay Plan for context and direction on servicing solutions. Each building can be individually serviced within the unit and a shared servicing agreement is not required.
Limiting distances are taken from the building face to the property boundary, and compliance with OBC Div. B. Article 3.2.3.1 is required to be maintained. The building code does permit limiting distances agreement(s) between property owners and are registered on title in accordance with OBC Division B 3.2.3.1.(11).	Acknowledged.
The following items, as they relate to the proposed condominium corporation structure, fall outside the scope of the building code. To ensure the building continues to function as one building, the following items must be considered. • Firefighting • Fire Protection Services	Acknowledged.

• Emergency Power • Structural Systems & Components • Mechanical Systems • Electrical Systems • Exits • Spatial Separation	
It is Building Standards' understanding that the Condominium Act and any associated agreement(s) will take into consideration the above-noted aspects of construction. The City's Legal Services and Planning Division will require verification and execution of any agreements required to confirm that the building will continue to function as one, prior to issuance of building permits that would put a site into non-compliance.	Acknowledged.
The City of Waterloo permits one of each service (sanitary, storm, water) per property. The subject development is proposing 4 separate lots on the property. Where services are shared between buildings located on separate properties, a Shared Servicing Agreement will be required.	Acknowledged. Please refer to the Servicing Overlay Plan. Each unit can be individually serviced and does not require a Shared Servicing Agreement.
City staff acknowledge receiving the condominium application fee of $26,870.00, the sign fee of 171.82, the sign deposit fee of $410.80, and one advertising fee of $2,547.02. Note that the advertising fee is required each time a notice is legislatively required to be placed in the newspaper. Any future newspaper advertisements required will require separate advertising fees.	Acknowledged.
Based on the above, the City is unable to support draft approval of this application at this time. The draft plan will need to be updated to address the above-mentioned comments and the required studies and reports identified by the City and the Region will need to be completed prior to draft approval. The Owner/Developer is advised that receipt of these post circulation comments does not constitute a draft nor final approval of this application. Prior to draft approval by the City, the comments above should be addressed. Prior to draft approval, the Owner/Developer must submit to the City a final digital copy of the plan to be draft approved. Once the plan of condominium is draft approved, the draft approval will take *effect* 21 days after the day the notice of decision is issued, provided no appeals are received in accordance with Section 51 (39) of the Planning Act. Any future development on the land subject to the above-noted application will be subject to the	Acknowledged. We request a meeting to discuss our resubmission package and determine next steps for achieving Draft Plan Approval.

provisions of the City of Waterloo Development Charge By-law 19-064 or any successor thereof.	
Region of Waterloo	
Should the City of Waterloo wish to proceed with draft approval for the plan of vacant land condominium application, Regional staff request that a draft approval condition be included to indicate the plan not proceed to final approval/registration until such time the Region of Waterloo has indicated in writing that there is sufficient water supply capacity to service the plan. Proposed wording for this condition, "That prior to final approval of this plan, the City has received written confirmation from the Region of Waterloo that there is sufficient water supply capacity to service the plan."	Acknowledged. Please refer to the Registration Clearance Letter dated May 13, 2004 and the OMB Decision dated November 8, 2002, which confirms that the Region was satisfied servicing perspective and their intent to secure access to the municipal water supply and wastewater treatment services through registration of the Plan of Subdivision. Additionally, Site Plan Approval for Tower A is imminent with building permits to follow giving allocation priority to the lands.
Subject to the inclusion of the above-noted condition, Regional staff has no concerns with the application.	Acknowledged.
The property is within the WHPA D-2 of the Waterloo North wellfield, and designated Wellhead Protection Sensitivity Area #8 on Map 6a of the Regional Official Plan (ROP). The purpose of these designations and the policies in Chapter 8 in the ROP is to protect the Region's long term municipal groundwater supplies.	Acknowledged.
If more than 1 level of underground parking is proposed, and/or if any below-grade infrastructure or excavations will encounter the water table, Regional staff will require the submission of a dewatering report for review. The proponent should be advised that the Region does not support permanent active or passive dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. In lieu of dewatering, below-grade infrastructure requiring dry conditions should be waterproofed.	Acknowledged.
Policy 8.A.18(b) of the ROP indicates geothermal wells are only permitted within the WHPSA #8 designation subject to further study in accordance with Policy 8.A.4. The Developer has not indicated whether geothermal wells would be considered in development of the site.	Acknowledged. No geothermal wells are proposed.
In accordance with Regional Council endorsed position on geothermal energy, vertical closed-loop geothermal is prohibited at this location. Staff request that a prohibition on vertical closed-loop geothermal energy systems be included in the Condominium Declaration. Vertical open-loop geothermal may be permitted subject to the satisfactory completion of a hydrogeological study to assess risk to nearby municipal drinking water supply wells. If a hydrogeological study is not submitted, staff requests that a prohibition on vertical open-loop geothermal energy systems also be	Acknowledged and to be included in the Condominium Declaration.

included in the Condominium Declaration. Shallow horizontal closed-loop geothermal design is permitted at this location.	
Staff requires that a stormwater management report be submitted as part of this application. The SWM report should include a detailed water balance for pre-development and post-development conditions, including a breakdown of infiltration volumes by source (i.e. rooftop, other impervious areas, pervious areas, etc.). Post-development infiltration volumes should match or exceed pre-development conditions.	A Stormwater Management Report / Plan was completed as part of the registration of the associated Plan of Subdivision and was cleared by Regional staff. Please refer to the Registration Clearance Letter dated May 13, 2004. Additionally, each Tower has/will consider appropriate stormwater management measures through the concurrent Site Plan Approval processes, which has evaluated the requested information regarding water balance for pre and post-development conditions. An additional Stormwater Management Report is not required.
Staff requests that the developer enter into an agreement to complete a Salt Management Plan (SMP), to the satisfaction of the Region, at Site Plan control for each of the units. This can be addressed by way of condition of draft approval. As part of the SMP, staff would encourage the proponent to incorporate design considerations with respect to salt management, including: • Ensure that cold weather stormwater flows are considered in the site design. Consideration should be given to minimize the transport of meltwater across the parking lots or driveway. This also has the potential to decrease the formation of ice and thereby the need for de-icing. • Directing downspouts towards pervious (i.e. grassy) surfaces to prevent runoff from freezing on parking lots and walkways. • Locating snow storage areas on impervious (i.e. paved) surfaces. • Locating snow storage areas in close proximity to catchbasins. • Using winter maintenance contractors that are Smart About Salt ^{TM} certified. • Using alternative de-icers (i.e. pickled sand) in favour of road salt.	Acknowledged. Please add a Salt Management Plan as a condition of Draft Approval.
The subject property is in a source protection area under the 2025 Grand River Source Protection Plan, but not within the area where Risk Management Plan or prohibition policies implemented by the Region of Waterloo apply. A Notice of Source Protection Plan Compliance (Section 59 Notice) is not required.	Acknowledged.
Regional Housing staff has no comments on the application.	Acknowledged.

A transportation impact study is required. Although the subject site does not front on a Regional Road, it will generate more than 100 peak hour trips, may have impacts on adjacent Erbsville / Laurelwood signalized intersection, and may result in traffic control changes at Laurelwood / Creekside. Please have the applicant contact the Tanikia Kinear, Transportation Planner at (519) 897-5691 or TKinear@regionofwaterloo.ca to arrange for a presubmission consultlation meeting in this regard.	Please refer to the Registration Clearance Letter dated May 13, 2004 confirming that a Transportation Impact Study was conducted as part of the registration process for the Plan of Subdivision. At that time, the Region was satisfied from a traffic perspective. A new Transportation Impact Study is not feasible and will not warrant additional road improvements.
Pursuant to Clause 4 of Region Agreement WR32895 registered April 21, 2004, a road traffic noise study is required. At this location, the proposed development may encounter environmental noise sources from Regional Road #70 (Erbsville Road). It is the responsibility of the applicant to ensure the proposed noise sensitive development is not adversely affected by anticipated noise impacts. To address the environmental noise impacts, the applicant must prepare an Environmental Noise Study; the noise levels criteria and guidelines for the preparation of the study should follow the Ministry of the Environment, Conservation and Park NPC-300 requirements and the Region' s Noise Policy Implementation Guideline.	Acknowledged. Please include this as a condition of Draft Plan Approval.
The consultant who prepares the Environmental Noise Study must be listed on the Region of Waterloo's Approved List of Noise Consultants. The noise consultant is responsible for obtaining current information, applying professional expertise in preforming calculations, making detailed and justified recommendations, submitting the Consultant Noise Declaration and Owner/Authorized Agent Statement. The consultant preparing the Environmental Noise Study must contact Region of Waterloo staff for transportation data, including traffic forecasts and truck percentages, for the purpose of preparing the Environmental Noise Study. Region of Waterloo staff will provide this data within three weeks of receiving the request from the noise consultant.	Acknowledged.
Please note that there is a $500 fee for the preparation of the traffic forecasts and review of the Environmental Noise Study. The noise consultant preparing the Environmental Noise Study must submit the transportation data request online. Resubmission of any Transportation Noise Study may be subject to a $250 resubmission fee.	Acknowledged.
The development is located within the proposed Airport Zoning Regulations with an allowable height of 548m ASL. The drawings indicate a 12-storey building	Further clarification regarding this comment is requested, specifically to confirm the reason for a Land Use Application through Nav Canada

elevation of 412.6m ASL. There is sufficient clearance for any cranes to remain below the AZR. The developer must submit a Land Use application to Nav Canada for the buildings and any cranes, and obtain a letter of no objections to the satisfaction of the Region.	since there is sufficient clearance for cranes below the AZR.
The subject property is well served by transit with GRT Route 13 travelling two ways on Laurelwood Drive. The closest pair of transit stops served by Route 13 are located less than an 80m walk away on Laurelwood Drive at Birchmount Drive. GRT has no plans to move a stop closer to, or adjacent to the subject property, and therefore, have no requirements.	Acknowledged.
From a waste management perspective, please note that the Region's collection program does not provide service to multi-residential buildings with seven or more units, as well as developments with internal road layouts that do not permit through-vehicle movements (waste collection vehicles are not permitted to reverse). All development options proposed would need to be serviced privately by a third-party waste contractor at the expense of the owner or property management company. Please also note that the Region is no longer responsible for recycling collection, so no comment can be made regarding this site's eligibility for receiving recycling collection. The applicant is advised to reach out to the current program administrator for recycling collection, Miller Waste Systems at area22@millerwaste.ca or 1-888-852-3450.	Acknowledged. Waste management to be privately managed on-site.
Region conditions of draft approval will be provided once the required studies noted in the Summary below have been provided to the satisfaction of the Region.	Acknowledged.
Regional staff acknowledges receipt of the application review fee, received March 30, 2026.	Acknowledged.
Any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charge By-law 19-037 or any successor thereof.	Acknowledged.
Regional staff is not able to support draft approval of the vacant land condominium plan application at this time. In addition to resolution of the water supply capacity issue, the following studies will be required: 1. Dewatering Report if more than one level of underground parking 2. Hydrogeological Assessment if geothermal wells being proposed 3. Stormwater Management Report 4. Transportation Impact Study 5. Road Traffic Noise Study	Acknowledged. Please refer to the enclosed revised materials together with the comment response for further information. We request that any further information required be provided as a condition of Draft Approval.
External Agencies	

Canada Post	
Canada Post has reviewed the proposal for the above noted Development Application and has determined that the project adheres to the multi-unit policy and will be serviced by developer/owner installed Lock Box Assembly. *Multi-unit buildings and complexes (residential and commercial) with a common lobby, common indoor or sheltered space, require a centralized lock box assembly which is to be provided by, installed by, and maintained by the developer/owner at the owner's expense. Buildings with 100 units or more MUST have a rear loading Lock Box Assembly with dedicated secure mail room.* Should the description of the project change, please provide an updated plan in order for us to assess the impact of the change on mail service. Canada Post appreciates the opportunity to comment on the above noted application and looks forward to working with you in the future.	Acknowledged.
Grand River Conservation Authority	
The GRCA has no objections to the draft plan of condominium application.	Acknowledged.
GRCA has reviewed this application under the Mandatory Programs and Services Regulation (Ontario Regulation 686/21), including acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the *Planning Act* as per our CA Board approved policies.	Acknowledged.
Information currently available at this office indicates that the subject property contains a part of the Sunfish Laurel Creek Provincially Significant Wetland Complex (PSW). As such, a portion of the subject property is regulated by GRCA under Ontario Regulation 41/24. Any new development/site alteration within the regulated area will require a permit from the GRCA. A copy of GRCA's resource mapping is attached.	Acknowledged.
It is our understanding that the applicant intends to subdivide the subject lands into four units, with common elements that include driveways, servicing, and amenity areas. We understand that site plan application SP-24-14 was submitted to the City of Waterloo to develop a 12-storey multiple residential building within Unit 1 of the proposed draft plan. Further, we understand that the remaining units are intended for future residential development, to be completed through phases.	Acknowledged.

GRCA previously provided comments on the pre-consultation circulation (PC-24-04) received March 21, 2024. Since that time, the regulation limit from the wetland was reduced to 30 metres due to changes to the Conservation Authorities Act. As the wetland and its newly reduced area of interference is encompassed within the Conservation (OS3) Zone, the GRCA has no further concerns with the proposed development. No GRCA permit will be required. This echoes our comments on the associated site plan application (SP-24-14), dated December 6, 2024.	Acknowledged.
Consistent with GRCA's approved 2023-2026 plan review fee schedule, the applicant will be invoiced a processing fee is $255.00 for our review of this application.	Acknowledged.
Hydro One	
We are in receipt of your Application for Condominium, 30CDM-25402 dated 2026-03-19. We have reviewed the documents concerning the noted Plan and have no comments or concerns at this time. Our preliminary review considers issues affecting Hydro One's 'High Voltage Facilities and Corridor Lands' only.	Acknowledged.
For proposals affecting 'Low Voltage Distribution Facilities' the Owner/Applicant should consult their local area Distribution Supplier. Where Hydro One is the local supplier the Owner/Applicant must contact the Hydro subdivision group at subdivision@Hydroone.com or 1-866-272-3330.	Acknowledged.
To confirm if Hydro One is your local distributor please follow the following link: Stormcentre (hydroone.com). If you have any further questions or inquiries, please contact Customer Service at 1-888-664-9376 or email CustomerCommunications@HydroOne.com.	Acknowledged.
Waterloo Catholic District School Board (WCDSB)	
That any Education Development Charges shall be collected prior to the issuance of a building permit(s).	Acknowledged.
That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/).	Acknowledged.
That the developer shall include the following wording in the condominium declaration to advise all purchasers of residential units and/or renters of same:	Acknowledged.

"In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."	
Waterloo Region District School Board (WRDSB)	
The Waterloo Region District School Board (WRDSB) has reviewed the above-noted application to create 4 units to facilitate a multi-residential development. The WRDSB *offers* the following comments.	Acknowledged.
At this time, the subject lands are currently assigned to the following WRDSB schools: • Abraham Erb Public School (Junior Kindergarten to Grade 6); • Laurelwood Public School (Grade 7 to Grade 8); and • Laurel Heights Institute (Grade 9 to Grade 12).	Acknowledged.
The WRDSB requests the following inclusions in the conditions of Draft Approval: 1. That the Owner/Developer shall include the following wording in the condominium declaration to advise all purchasers of residential units and/or renters of same: *a) "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school."* *b) "For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information."* *c) "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."*	Acknowledged.
The WRDSB requests to be circulated on any subsequent submissions on the subject lands and	Acknowledged.

reserves the right to comment further on this application.	
Telus	
TELUS has no underground infrastructure in the area of your proposed work.	Acknowledged.

We trust that the above information together with the enclosed resubmission materials is sufficient for review and to recommend Draft Plan of Condominium Approval. We request a meeting with City and Regional staff to discuss the information contained herein to ensure the necessary information is provided.

Yours truly,

MHBC





Dave Aston, MSc, MCIP, RPP
Vice-President, Partner

Victoria Gignac, MCIP, RPP
Senior Planner

cc. *Scott Gareau, LMRW GP Inc.*
Sean French, LMRW GP Inc.