PLANNING JUSTIFICATION REPORT

170 & 180 COLUMBIA STREET W, WATERLOO

Official Plan Amendment & Zoning By-Law Amendment Applications

up consulting



EXECUTIVE SUMMARY

This Planning Justification Report ('Report') has been prepared as part of the complete Official Plan Amendment and Zoning By-law Amendment applications for the proposed mixed-use development of the properties municipally known as 170 & 180 Columbia Street West ('Subject Lands', 'Subject Property', 'Site').

The applicant is proposing a comprehensive, multi-phase mixed-use development that will be executed over five (5) phases. The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 37 to 41 storeys, along with ground floor commercial/retail space, and extensive amenity areas. The proposed development comprises a total of 2,438 dwelling units and 3,206 bedrooms across the five (5) phases. A total of 1,532 m² of commercial/retail space is proposed across the development. A proposed Privately-Owned Publicly Accessible Space (POPS), measuring approximately 1,896 m², will serve as a central green gathering space for the community.

An Official Plan Amendment and corresponding Zoning By-Law Amendment are required to permit the mixed-use development and establish site specific regulations pertaining to the maximum height, density, podium height and minimum landscaped open space.

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

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

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

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

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1. INTRODUCTION

This Report has been prepared as part of the complete Official Plan Amendment and Zoning By-law Amendment applications for the proposed mixed-use development of the properties municipally known as 170 & 180 Columbia Street West, Waterloo.

The applicant is proposing a comprehensive, multi-phase mixed-use development that will be executed over five (5) phases. The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 37 to 41 storeys, along with ground floor commercial/retail space, and amenity areas. The proposed development comprises a total of 2,438 dwelling units and 3,206 bedrooms across the five (5) phases. A total of 1,532 m² of commercial/retail space is proposed across the development. A proposed Privately-Owned Publicly Accessible Space (POPS), measuring approximately 1,896 m², will serve as a central green gathering space for the development.

An Official Plan Amendment and corresponding Zoning By-Law Amendment are required to permit the mixed-use development and establish site specific regulations pertaining to the maximum height, density, podium height and minimum landscaped open space.

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

Specific consideration has been given to assessing the existing employment land use planning development controls which currently apply to the lands and the suitability of these lands for mixed-use purposes in a Major Transit Station Area. Based on our review of the site and its context, it is our opinion that the properties municipally known as 170 & 180 Columbia Street West would be better planned as a mixed-use high density residential development, which largely reflects the existing built form of the area.

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

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

2. SITE LOCATION

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

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



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

The subject lands have a combined total area of 15,978.7 sq. m, with a combined frontage of 102.2 metres along Columbia Street West. The existing sites consists of parking areas and two (2) office buildings, which are proposed to be demolished in order to facilitate the proposed development. Figures 2 and 3 below show the existing buildings on each site.



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



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

3. CONTEXT ANALYSIS

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

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

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

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

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

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

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

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

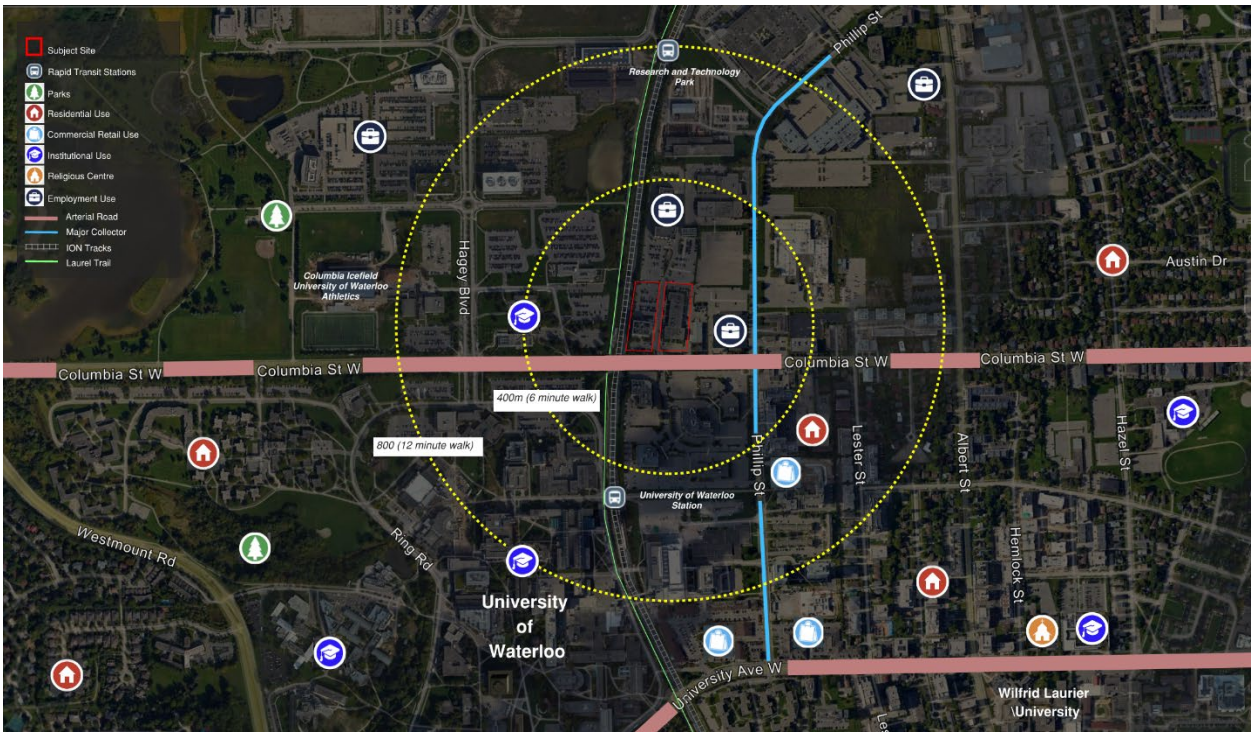


Figure 4: *Neighbourhood Context Map (Source: Region of Waterloo GIS Portal)*

4. PROPOSAL DETAILS

The applicant is proposing a comprehensive, multi-phase mixed-use development that will be executed over five (5) phases. The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 37 to 41 storeys, along with ground floor commercial/retail space, and extensive amenity areas. The proposed development comprises a total of 2,438 dwelling units and 3,206 bedrooms across the five (5) phases. A total of 1,532 m² of commercial/retail space is proposed across the development. These uses will be concentrated along key pedestrian desire lines and primary building frontages to activate the streetscape and provide daily services to residents and visitors.

Phases 1 and 3 are strategically positioned to frame Columbia Street West, contributing to an active and vibrant streetscape. Between these buildings, a new Privately-Owned Publicly Accessible Space (POPS), measuring approximately 1,896 m², will serve as a central green gathering space for the community. The Phase 2 tower is located immediately behind the POPS, ensuring that the open space is animated and framed by built form.

Phases 4 and 5 are located deeper into the site, forming a compact and cohesive urban block structure that optimizes land use and enhances walkability. Figure 5 below shows the Site Plan prepared by AAA Architects Inc.

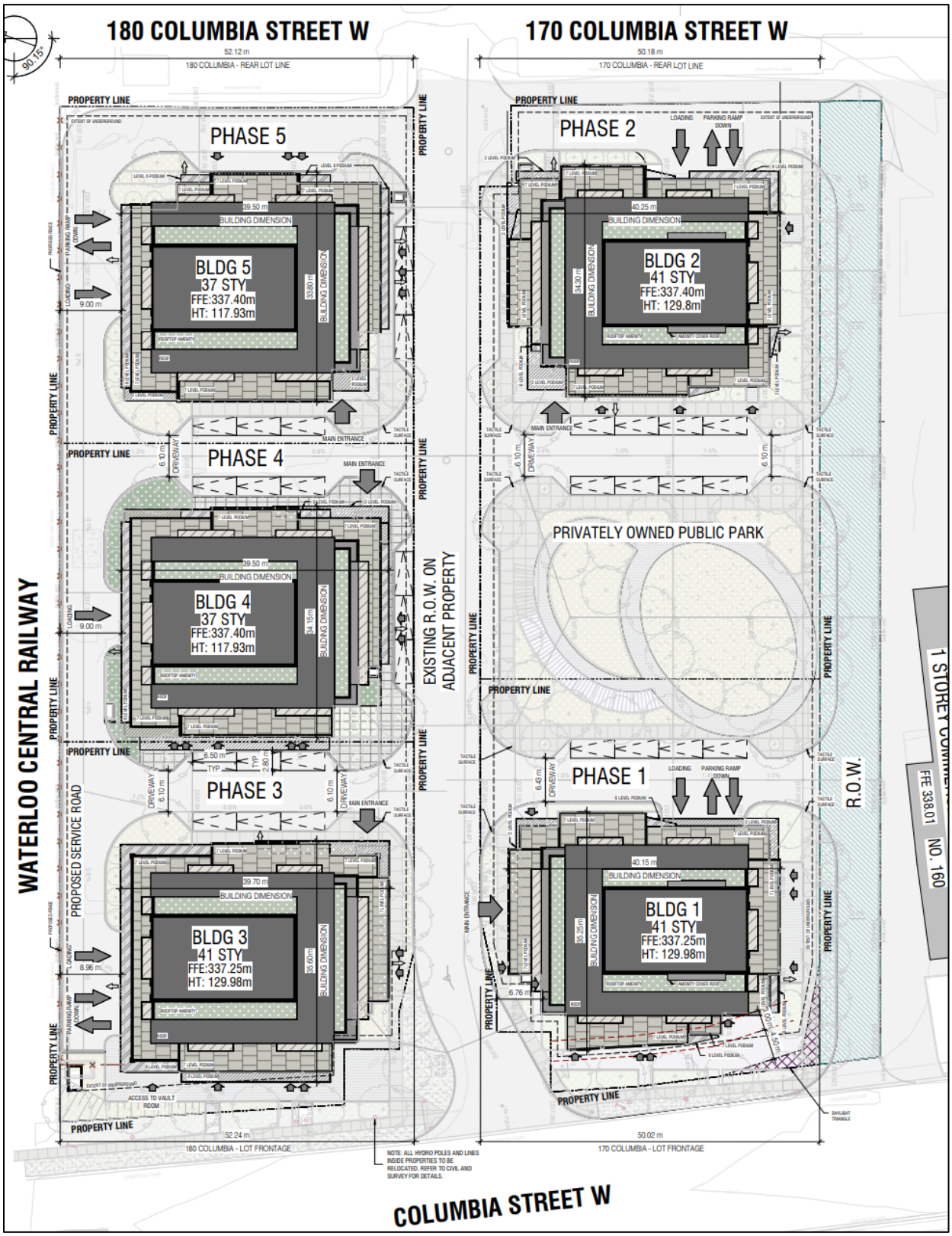


Figure 5a: *Site Plan (Source: AAA Architects Inc.)*

a) Unit Breakdown

The current development proposal contemplates a total of 2,438 dwelling units and 3,206 bedrooms, as detailed in the table below and Figure. As detailed in the table, a broad range and mix of unit types are contemplated to be included in the overall development.

UNIT TYPE/PHASE	TOTAL UNITS	TOTAL BEDROOMS
PHASE 1		
Bachelor	73	0
Bachelor (BF)	51	0
1 Bedroom	8	8
1 Bedroom (BF)	140	140
2 Bedroom	204	408
2 Bedroom (BF)	33	66
	509	**622**
PHASE 2		
Bachelor	5	0
Bachelor (BF)	17	0
1 Bedroom	76	76
1 Bedroom (BF)	174	174
2 Bedroom	136	272
2 Bedroom (BF)	101	202
	509	**724**
TOTAL 170 COLUMBIA	**1018 units**	**1346 bedrooms**
PHASE 3		
Bachelor	72	0
Bachelor (BF)	50	0
1 Bedroom	8	8
1 Bedroom (BF)	140	140
2 Bedroom	204	408
2 Bedroom (BF)	34	68
	508	**624**
PHASE 4		
Bachelor	64	0
Bachelor (BF)	46	0
1 Bedroom	8	8
1 Bedroom (BF)	124	124
2 Bedroom	180	360
2 Bedroom (BF)	34	68
	456	**560**
PHASE 5		
Bachelor	64	0
Bachelor (BF)	46	0
1 Bedroom	12	12
1 Bedroom (BF)	8	8
2 Bedroom	180	360
2 Bedroom (BF)	150	300
	456	**676**
TOTAL 180 COLUMBIA	**1420 units**	**1860 bedrooms**
GRAND TOTAL	**2438 units**	**3206 bedrooms**

b) Access, Circulation, and Parking

The five (5) phases of the development are organized around a logical internal circulation network with access primarily provided via the existing private drive aisle from Columbia Street West. This drive aisle is subject to an existing vehicular access easement that benefits the subject lands and will remain in place to facilitate site access.

In addition, a proposed 9.0 metre right-of-way is planned along the eastern boundary of Phase 1 and Phase 2, in accordance with discussions with City staff, to support future connectivity to lands to the north and east of the site. For the foreseeable future this right of way is planned to serve the proposed development, however it is anticipated that the right of way could be used to provide access to adjacent lands to support interconnectivity in and through the broader block. In the event that lands east of the site were to redevelop, this area of the subject lands has been designed so that it could be converted into a municipal right of way if additional lands from properties to the east are made available for such purposes.

Parking is provided primarily within two (2) levels of underground parking and limited surface / short-term parking spaces within close proximity of building entrances. The underground parking garage entrances are located and designed away from the Columbia Street West frontage. The proposed surface parking areas will be well-integrated into the site design to minimize visual impacts from the public realm. The proposed development will provide a total of 587 parking spaces across the entire site. More specifically, 504 spaces are dedicated to residential units, 59 spaces are allocated to visitors, and 24 spaces are dedicated to commercial/retail uses.

Each building is designed with a dedicated internal loading space, seamlessly integrated into the building podium and screened from public view. These loading areas are positioned away from the primary street frontage to ensure they do not negatively impact the pedestrian environment. The site layout also accommodates garbage collection and emergency service vehicle access in accordance with municipal standards. Garbage enclosures are situated within each building podium and are designed to allow for efficient collection while being fully screened from the public realm. Emergency vehicles can access all phases via the internal driveway network and proposed public right-of-way, with building layouts and turning radii designed to support safe and efficient fire truck circulation.

In addition to vehicular parking, sustainable transportation options are prioritized through the provision of 1,605 bicycle parking spaces, including 1,555 spaces for residents and 50 spaces for commercial/retail users. The integration of high volumes of bicycle parking supports the City's goals for active transportation and transit-oriented development.

c) Amenity Areas and Landscaping

The development includes a significant amount of both indoor and outdoor amenity space to serve future residents. Across all phases, a total of 21,994.0 m² of combined amenity space is provided, comprising of; 21,413.0 m² of outdoor amenity space, including the POPS, rooftop terraces, and other private outdoor areas; and 581.0 m² of indoor amenity space, distributed among the buildings.

A key component of the proposed development is the POPS, located centrally within the site immediately behind the Phase 1 building. The POPS, at approximately 1,896 m² in size, is

strategically positioned to create a vibrant and highly accessible gathering space framed by the surrounding buildings. Its central location enhances pedestrian connectivity throughout the site and to Columbia Street West, while providing a meaningful and active open space amenity for both residents and the broader community. Though to be confirmed at the Site Plan Application Stage with the detailed Landscape Plan, the size and design of the POPS are intended to support a range of recreational and social activities, contributing to the overall placemaking objectives of the MTSA. Should the POPS be finalized and constructed as proposed, the applicant intends to convey the space to the City to satisfy a portion of the development's parkland dedication requirement. In the event that the POPS cannot be provided or accepted by the City, the applicant is proposing to fulfill the parkland dedication requirement through a cash-in-lieu contribution to support parkland acquisition and improvements elsewhere in the City.

d) Phasing or Development Implementation Strategy

Given the interconnectedness of the subject lands to other sites within the broader block, at the Pre-Submission Consultation Meeting the City identified the need for a broader Block Plan to be prepared with regards to how the area may develop over time. This conceptual Block Plan has been included as part of the complete applications.

In addition to this request, the City requested that a phasing and development implementation strategy be included within this Report discussing how the specific development of 170 and 180 Columbia Street may occur from conception to completion, including the required land use planning applications necessary prior to construction.

Staging of Development

As contemplated on the Master Plan drawing included within the architectural drawing set prepared by AAA Architects, the overall development is planned to occur in five phases as generally shown below.

Phase 1 will include a 41 storey building located on the south side of 170 Columbia facing Columbia Street West. The access lane along the east side of the site will be established as part of this initial phase, which will terminate at the northern end of the Phase 1 block. At the current time, the Phase 1 building is contemplated as a purpose built rental apartment building. Lands to the rear of the building will be used for construction staging and access. It is anticipated that construction on Phase 1 will be initiated in 2026.

Phase 2 will include the second building on 170 Columbia Street West. This phase will include the development of the POPS as well as the extension of the drive aisle to the northern limit of the parcel. During the construction of this building, the future POPS space will be used for construction staging.

Phases 3-5 are currently planned to be developed as a single condominium, with the development of these Phases beginning towards Columbia Street and working northwards. During the build out of the site lands north of the previous phases will be used for construction staging and storage.

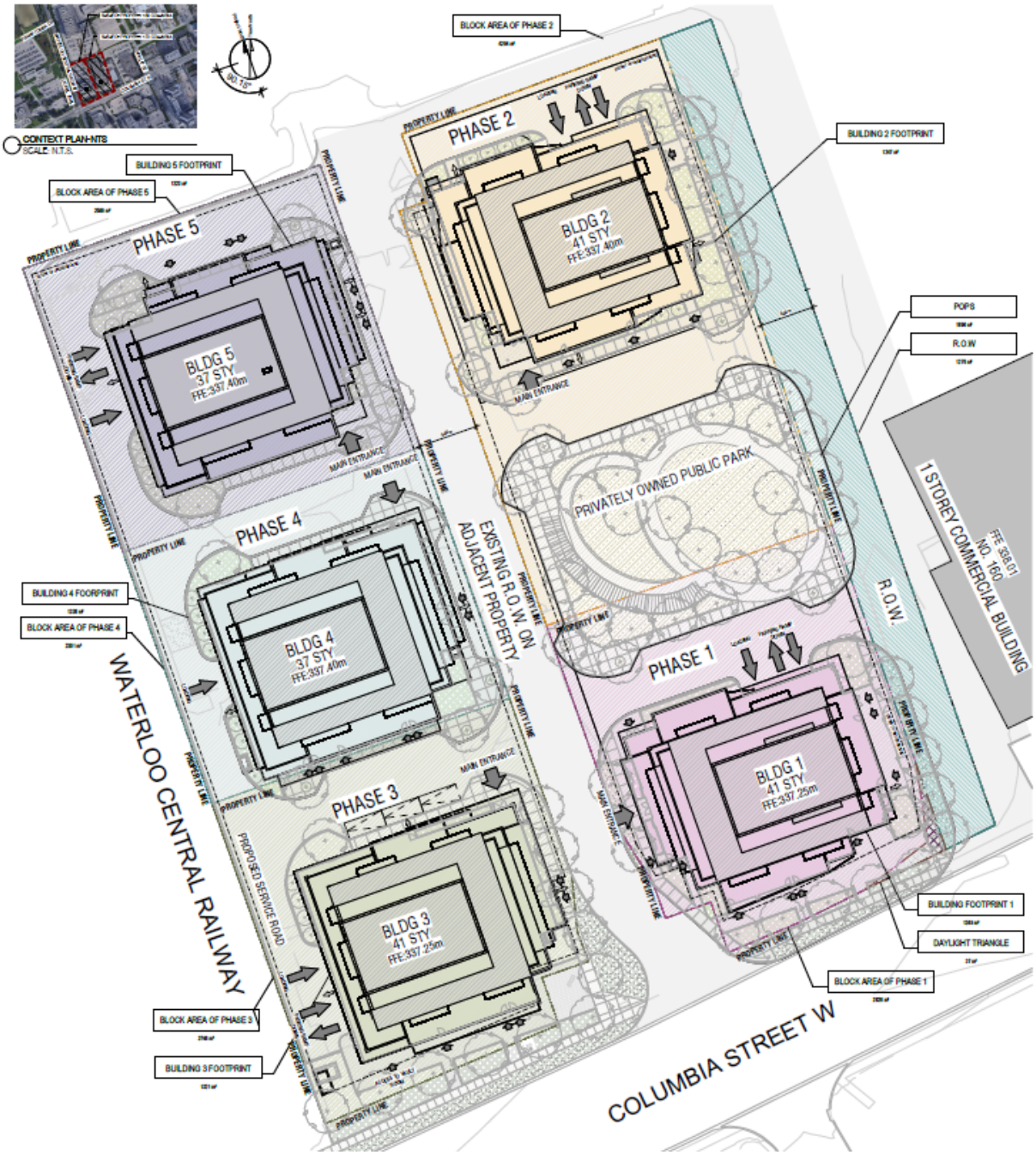


Figure 6b: *Site Plan Staging (Source: AAA Architects Inc.)*

Required Development Applications

In order to facilitate the phased development of the subject lands, a number of corresponding planning applications will be required. While the type of planning application actually required will depend on several considerations (including proposed tenure / ownership), the currently anticipated planning applications are summarized in the following table.

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

Easements and Development Agreements

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

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

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

In addition to the potential modification of these existing easements and development agreements, it is anticipated that additional easements may need to be established to provide access rights over the proposed drive aisle, provide for the shared (private and public) use of the proposed POPS space, and to allow for access between the phases as a master planned development. The extent and effect of these easement rights and required development agreements will be confirmed through the future development approvals identified above.

5. REQUESTED APPROVALS

In order to permit the proposed development, a site-specific Official Plan Amendment and corresponding Zoning By-Law Amendment application are proposed. Details of these required planning applications are provided in the subsections below.

Further, it should also be noted that the applicant is proposing two (2) distinct Special Policy Areas through the Official Plan Amendment, and two (2) distinct Zones with Site-Specific Provisions through the Zoning By-law Amendment — one for each property, being 170 Columbia Street West and 180 Columbia Street West. Each parcel will have its own dedicated Special Policy Area and Site-Specific Zoning Provisions, rather than applying a single 'blanket' designation and zone across both sites.

a) Official Plan Amendment

170 Columbia St W (Phases 1 & 2)

Change the Land Use Designation on Schedule 'A' (Land Use Plan) from 'Employment' to 'Station Area Mixed-Use'.

Remove the 'Business Employment' designation from the subject property on Schedule 'A2' (Employment Areas).

Designate the subject property on Schedule 'B1' (Height and Density) from 'High Density Employment, 81 metres' to 'High Density, 30 Storeys'.

Designate the subject property on Schedule 'A6' (Specific Provision Areas) to include a 'Specific Provision Area __ (SPA _)' that reads as follows:

- Permit a Maximum Building Height of 41 Storeys, whereas 30 Storeys is permitted;

180 Columbia St W (Phases 3 to 5)

Change the Land Use Designation on Schedule 'A' (Land Use Plan) from 'Employment' to 'Station Area Mixed-Use'.

Remove the 'Business Employment' designation from the subject property on Schedule 'A2' (Employment Areas).

Designate the subject property on Schedule 'B1' (Height and Density) from 'High Density Employment, 81 metres' to 'High Rise, 30 Storeys'.

Designate the subject property on Schedule 'A6' (Specific Provision Areas) to include a 'Specific Provision Area __ (SPA _)' that reads as follows:

- Permit a Maximum Building Height of 41 Storeys, whereas 30 Storeys is permitted;

b) Zoning By-Law Amendment

170 Columbia St W (Phases 1 & 2)

Rezone the subject property from '(Holding) Business Employment Two A Zone ((H)E2A-81)', to a '(Holding) Site-Specific Residential Mixed Use – 81 Zone ((H)RMU-81)' with the following Site-Specific Provisions:

- Permit a Maximum Building Height of 130.0 metres and 41 Storeys, whereas the Zoning By-law requires a Maximum Building Height of 81 metres and 25 Storeys;
- Permit a Maximum Density of 1,613 bedrooms per hectare, whereas the Zoning By-law requires a Maximum Density of 750 bedrooms per hectare;
- Permit a Maximum Podium Height of 22.5 metres and 7 Storeys, whereas the Zoning By-law required a Maximum Podium Height of 21.0 metres and 6 Storeys;
- Permit a Minimum Tower Separation of 7.5 metres from the Interior Lot Line (West), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Minimum Tower Separation of 9.0 metres from the Interior Lot Line (East), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Maximum Street Line Setback of 11.2 metres where 0% of the Street Line Front Building Façade is within 6.0 metres of the Streetline, whereas the Zoning By-law requires 75%;
- That a Holding Provision (H) be applied to the subject property for which the following applies:
    - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and,
    - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

180 Columbia St W (Phases 3 to 5)

Rezone the subject property from '(Holding) Business Employment Two A Zone ((H)E2A-81)', to a '(Holding) Site-Specific Residential Mixed Use – 81 Zone ((H)RMU-81)' with the following Site-Specific Provisions:

- Permit a Maximum Building Height of 130.0 metres and 41 Storeys, whereas the Zoning By-law requires a Maximum Building Height of 81 metres and 25 Storeys;
- Permit a Maximum Density of 2,436 bedrooms per hectare, whereas the Zoning By-law requires a Maximum Density of 750 bedrooms per hectare;
- Permit a Maximum Podium Height of 22.5 metres and 7 Storeys, whereas the Zoning By-law requires a Maximum Podium Height of 21.0 metres and 6 Storeys;
- Permit a Minimum Landscaped Open Space of 21%, whereas the Zoning By-law requires a Minimum Landscaped Open Space of 30%;

- Permit a Minimum Tower Separation of 6.7 metres from the Interior Lot Line (East), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Maximum Street Line Setback of 11.8 metres where 0% of the Street Line Front Building Façade is within 6.0 metres of the Streetline, whereas the Zoning By-law requires 75%;
- That a Holding Provision (H) be applied to the subject property for which the following applies:
    - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and,
    - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

6. LAND USE PLANNING FRAMEWORK

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

a) Planning Act

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

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

i. Matters of Provincial Interest

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

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

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

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

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

b) Provincial Planning Statement (2024)

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

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

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

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

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

	multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs; b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.	the creation of complete communities. a) The proposed development consists of a total of 2,438 dwelling units, which includes a range of bachelor, one- and two-bedroom units. b) The proposed development will be designed to meet or exceed the AODA requirements. c) The mix of rental unit types ensures affordability and diversity, benefiting a broad range of income levels. The inclusion of indoor and outdoor amenity space enhances residents quality of life, promoting social equity and well-being.
Housing		
2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; b) permitting and facilitating: i. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and	a) The proposed development will contribute to the provision of a range and mix of housing options within the regional market area by delivering a total of 2,438 residential units in a high-density built form. The development is expected to include a mix of unit types, aligning with the diverse housing needs of both the Region and City of Waterloo. b) The proposed development facilitates a wide range of housing options and intensification forms in a strategic urban location. The mix of unit types will be well-suited to meet the evolving social, economic, and demographic needs of the community, including housing for students, workers in the nearby Research and

	ii. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites… c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.	Technology Park, and other urban residents. c) The proposed density promotes an efficient use of land, infrastructure, and public service facilities by concentrating residential and commercial uses within a compact urban footprint. The development is located in an area currently serviced by municipal infrastructure and in proximity to a variety of amenities and institutional uses. d) The development demonstrates transit-supportive intensification, located within an eight-minute walk of the University of Waterloo ION LRT station and twelve minutes from the Research and Technology Station, in addition to multiple GRT routes.
Settlement Areas		
2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	The proposed development is located within the Region of Waterloo's Built-Up Area and is situated entirely within an MTSA identified in the City of Waterloo Official Plan. The site does not abut any low-rise residential neighbourhoods or other sensitive land uses, and therefore does not introduce compatibility concerns often associated with high-density intensification. As an MTSA, this area is specifically planned to accommodate significant infill and high-rise development, in alignment with Provincial, Regional, and local growth management policies that encourage compact, transit-supportive urban form.

2.3.1.2	Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities; c) support active transportation; d) are transit-supportive, as appropriate; and e) are freight-supportive.	a) The development promotes efficient use of underutilized land that is located within an MTSA and is adjacent to urbanized land containing a mix of uses. b) It is located within a well-serviced area and can connect to existing municipal infrastructure. c) The subject lands are adjacent to the Laurel Trail, connecting users of the site to nearby amenities as well as to alternative modes of transit. d) The development fosters transit supportive densities to promote the use of existing transit systems in the area. The subject lands are located between two (2) LRT stations, as well as near the University of Waterloo's bus terminal, providing access to several GRT routes and GO transit services. e) Not Applicable.
2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.	The mixed-use development supports intensification in a Built-Up Area and supports the achievement of complete communities by providing a range of housing options, common amenities and retail uses.
Major Transit Station Areas		
2.4.2.2	Within *major transit station areas* on *higher order transit* corridors, planning authorities shall plan for a minimum density target of: 1. 200 residents and jobs combined per hectare for those that are served by subways; 2. 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or 3. 150 residents and jobs combined per hectare for those that are	The proposed development has a density of approximately 1,905 units per hectare (excluding the POPs area of 1,896 m^2 and new public right-of-way area of 1,276 m^2), which significantly contributes to the achievement of the minimum density targets for lands served by light rail transit. Located within an MTSA that is currently characterized by predominantly low-density, auto-oriented employment uses, the proposed

	served by commuter or regional rail.	development supports the transformation of the area into a more compact, transit-supportive, and complete community as envisioned by local and provincial planning policy.
2.4.2.3	Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by: 1. planning for land uses and built form that supports the achievement of minimum density targets; and 2. supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit-supportive and promote complete communities.	The proposed development is located within an MTSA. The proposed development and intensification of the subject lands is appropriate given its context.
Sewage, Water and Stormwater		
3.6.2	Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.	The development will connect to the existing municipal water and sanitary services available along Columbia Street W.
3.6.8	Planning for stormwater management shall: a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle; b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads; c) minimize erosion and changes in water balance including through the use of green infrastructure;	The subject property is proposed to connect to existing storm infrastructure as detailed in the Functional Servicing & Stormwater Management Report prepared by WalterFedy. Detailed stormwater design will be confirmed through the future Site Plan Approvals process.

	d) mitigate risks to human health, safety, property and the environment; e) maximize the extent and function of vegetative and pervious surfaces; f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.	
Public Spaces, Recreation, Parks, Trails and Open Space		
3.9.1	Healthy, active, and inclusive communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate *active transportation* and community connectivity; b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages.	a) The proposed development will contribute to a healthy, active, and inclusive community by introducing a well-connected public realm that prioritizes safety, accessibility, and social interaction. Public streets and internal pathways will be designed to accommodate pedestrians, cyclists, and persons of all ages and abilities, integrating with the existing active transportation network, including the adjacent Laurel Trail. b) The proposed development includes a large park area as part of Phase 2 of the overall development, which the applicant is proposing as a POPS. This space, combined with the development's pedestrian connections, contributes to a diverse range of publicly accessible natural and built recreational settings. The POPS will offer flexible and inclusive outdoor space.

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

c) Region of Waterloo Official Plan

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

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

i. Urban Area and Built-Up Area

The ROP identifies the subject property as within the City of Waterloo Urban Area and Built-Up Area, as sown in Figure 6 below. The Built-Up Area includes all lands within the built boundary of the Region's Urban Area and Township Areas as of June 16, 2006.

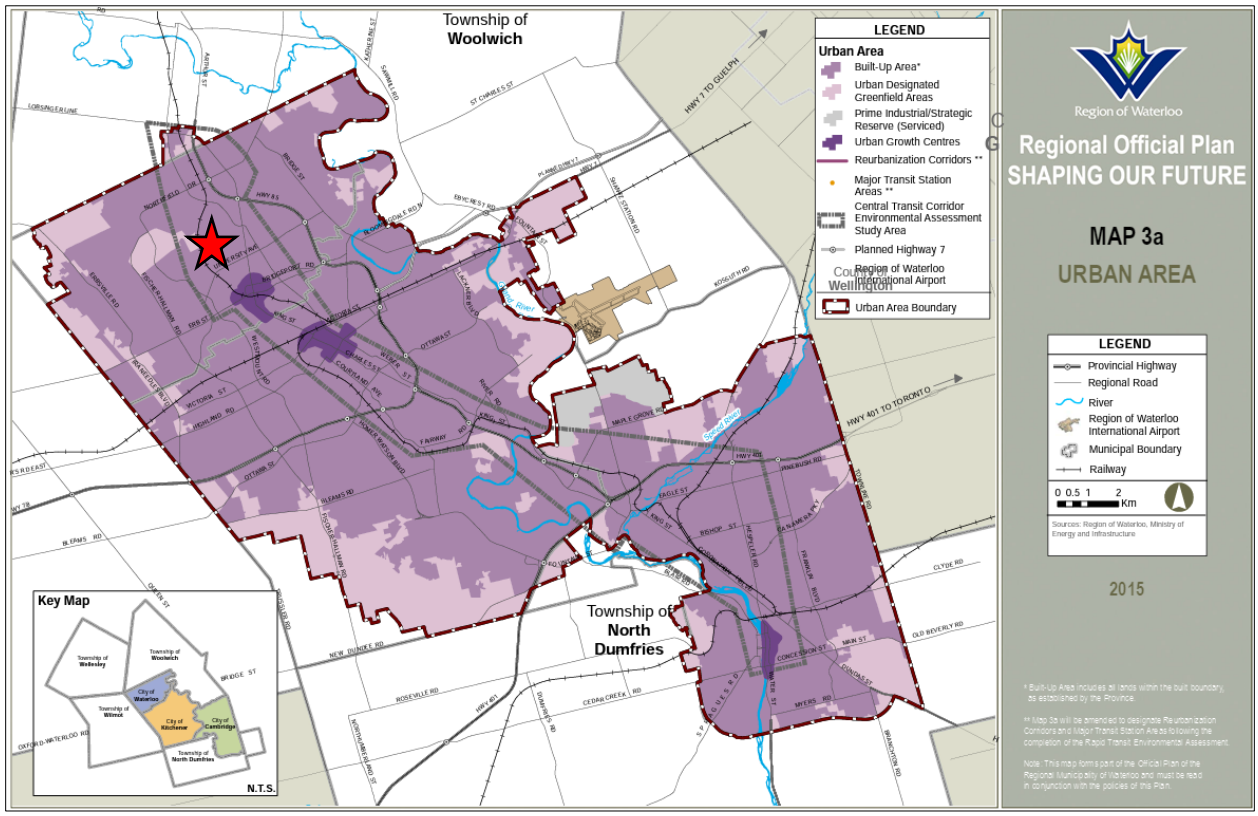


Figure 7: *Region of Waterloo Official Plan, Map 3a*

Within this area, the ROP directs that 45% of new residential development should be directed by the area municipalities in order to support the efficient use of land, and physical and community infrastructure/services. By proposing a mixed-use high density residential development of the

subject property located within the Built-Up Area, the proposed development will help satisfy the Region's density target of growth.

Development within the Built-Up Area is subject to Policy 2.D.1 of the ROP, which discussed in the following table:

Criteria	Discussion of Conformity
In preparing or reviewing planning studies, or in reviewing development applications or site plans, the Region and/or Area Municipalities will ensure that development occurring within the Urban Area is planned and developed in a manner that:	
a) supports the Planned Community Structure described in this Plan;	The proposed development supports the planned function of the Urban Area and Built-Up Area of the ROP, as the focus is the growth and development in the Region.
b) is serviced by a municipal drinking-water supply system and a municipal wastewater system;	The proposed development will be serviced by municipal water and wastewater servicing, and as noted in the Functional Servicing Report prepared by WalterFedy.
c) contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit;	The proposed development contributes to the creation of a complete community by providing a mix of residential and commercial uses at a transit-supportive density, all within walking distance of major institutions, services, and active transportation infrastructure.
d) protects the natural environment, and surface water and groundwater resources;	Not applicable, as the subject lands do not consist of any significant natural features.
e) conserves cultural heritage resources and supports the adaptive reuse of historic buildings;	Not applicable, as the subject lands do not consist of any cultural heritage resources.
f) respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;	The proposed development respects the scale, physical character, and context of the surrounding area by locating high-density built form within a mixed-use, transit-oriented node that is already characterized by existing and planned mid- to high-rise developments, institutional uses, and commercial spaces.
g) facilitates residents' access to locally grown and other healthy foods in neighbourhoods; and	The proposed development facilitates residents' access to locally grown and healthy foods by incorporating ground-level commercial spaces that can accommodate food retailers, and by situating residents within walking distance of existing

		grocery stores, food services, and transit routes that connect to nearby food destinations.
h)	promotes building designs and orientations that incorporate energy conservation features and the use of alternative and/or renewable energy systems.	The proposed development promotes building designs and orientations that incorporate energy conservation features through sustainable site planning, optimized building orientation for natural light, and the potential integration of renewable energy systems such as solar panels and high-efficiency mechanical systems.

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

ii. Source Water Protection

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

Wellhead Protection Sensitivity Areas (WPSA) are classified from 1 to 8, which allows for varying degrees of management relative to the vulnerability of the underlying groundwater to contamination, the importance of the well to the capacity of the municipal drinking-water supply systems, as well as the length of time groundwater within the WPSA will take to reach the municipal drinking-water supply well.

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

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

d) Region of Waterloo Official Plan Amendment 6 (ROPA 6)

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

This amendment establishes the planning framework in the Regional Official Plan (ROP) to accommodate Waterloo Region's forecasted population and employment growth to 2051, in conformity with Schedule 3 of the Growth Plan for the Greater Golden Horseshoe, 2019 (Growth Plan). It will help guide strategic decisions regarding land use planning and a range of Regional services, including transportation, public transit, water and wastewater supply and services, public health, economic development, affordable housing and others. The amendment also updates several other planning policies, objectives, and mapping in the ROP to ensure they conform to the Growth Plan and the Greenbelt Plan, 2017, or do not conflict with them, and are consistent with the Provincial Policy Statement, 2020.

The overall effect of this amendment is to support Waterloo Region's long-term growth and development in a way that achieves an equitable, thriving and sustainable regional community for all residents.

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

Section 1.1 of ROPA 6 provides that by 2051, the Region of Waterloo is anticipated to grow to accommodate a population of 923,000 people from its current population of approximately 600,000. Section 1.3 of ROPA 6 sets out the purpose of the plan to establish a framework for growth and development to the year 2051.

i. Where and How to Grow

Chapter 2 of ROPA 6 sets out policy direction as to where and how to grow, and establishes several objectives in that regard:

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

- Conserve and promote cultural heritage resources to support the social, economic, and cultural well-being of all communities, including First Nations, Métis, Inuit, and other local Indigenous peoples.

The proposed mixed-use development aligns strongly with the growth management objectives set out in Chapter 2 of ROPA 6 by advancing a compact, complete community model within a strategically located, transit-accessible urban node. The development supports the creation of a vibrant 15-minute neighbourhood by integrating residential, commercial, and public realm elements within walking and cycling distance of key institutional, employment, and recreational destinations, including the University of Waterloo, the Research and Technology Park, and the Laurel Trail. The site's proximity to two (2) ION LRT stations and multiple GRT routes reinforces convenient regional access and supports a shift toward sustainable, low-emission travel modes.

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

Within the Built-Up Area, ROPA 6 establishes several objectives for growth including achieving "*transit-supportive"* development, and the creation of *"15-minute neighbourhoods"*. It is noted that the terms "*transit-supportive*" and "*15-minute neighbourhoods*" are defined by the plan as follows:

Transit-supportive:	Relating to development that makes transit viable and improves the quality of the experience of using transit. It often refers to compact, mixed-use development that has a high level of employment and residential densities. Transit-supportive development will be consistent with Ontario's Transit Supportive Guidelines.
15-Min. Neighbourhood:	Neighbourhoods that are Compact, well-connected places such as mixed-use neighbourhoods or other areas within the Urban Area and Township Urban Areas. They are places that offer support and opportunities for people of all ages and abilities and at all times of year to conveniently access the necessities for daily living with a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by taking direct, frequent, and convenient transit, wherever possible. 15-minute neighbourhoods include an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. They are also age-friendly places and may take different shapes and forms appropriate to their contexts.

The proposed development supports the transit-supportive development goals of ROPA 6 through its compact, mixed-use form and proximity to two (2) ION LRT stations and multiple GRT routes.

The high-density design and inclusion of commercial uses enhance the viability of transit and improve the overall transit user experience through walkable, active streetscapes.

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

ii. Employment Areas

The subject lands are no longer identified within the 'Employment Areas' designation in Map 3 of ROPA 6. Figure 7 below shows Maps 3 from the Minister's Decision with modifications to ROPA 6. Therefore, the lands are noted as 'Urban Area' and are no longer designated for employment purposes.

As noted further in Section 6.g.i. of this Report, the subject lands will no longer be designated for employment purposes in the City of Waterloo Official Plan to align with Map 3 of ROPA 6. As a continuation of the Region's employment area municipal comprehensive review, the City of Waterloo's adopted Official Plan Amendment No. 58 identifies a new land use designation for employment areas within MTSAs, being the 'Station Area Mixed-Use' designation. This designation applies to large sites that are converted from employment, as identified in the Region's Municipal Comprehensive Review and ROPA 6.

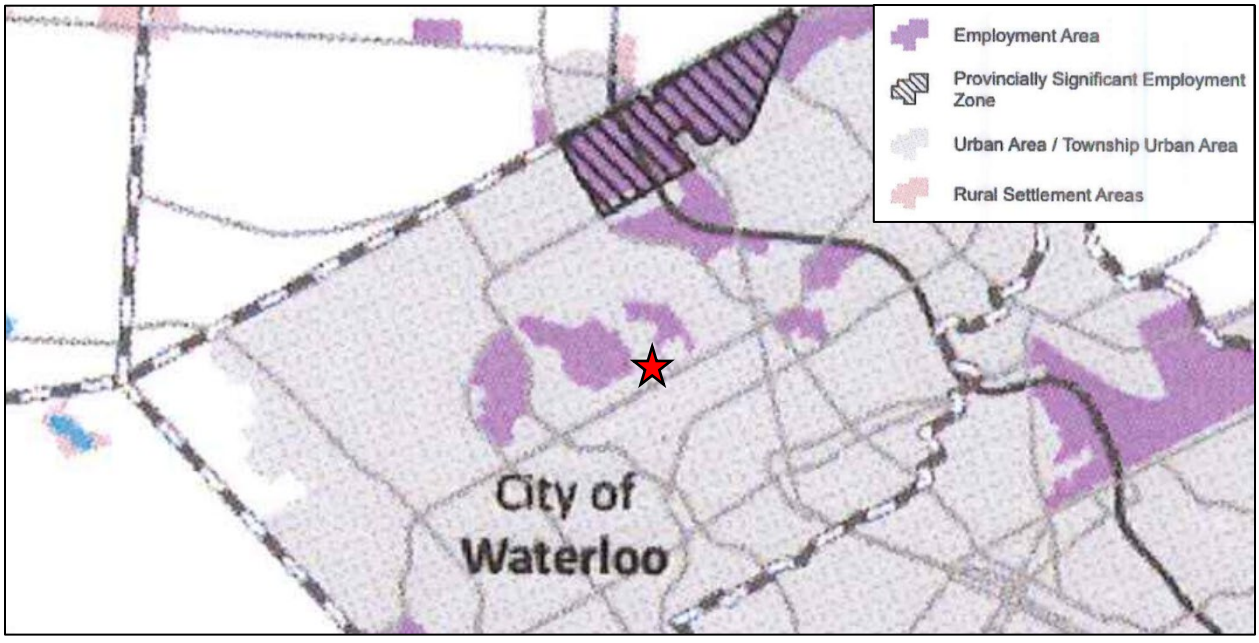


Figure 8: *ROPA 6, Map 3 from Minister's Decision (Employment Area)*

iii. Major Transit Station Area Policies

Figure 4c of ROPA 6 identifies the subject lands within the 'Research & Technology Station' MTSA plan (Figure 8). Section 2.D.2 of ROPA 6 provides policies pertaining to MTSAs in the Region of Waterloo. More specifically, Section 2.D.2.2 outlines the specific criteria in which area

municipalities, like the City of Waterloo, will undertake detailed planning and establish official plan policies and zoning by-laws to ensure that Major Transit Station Areas are planned and designed in a manner that addresses the criteria listed in the table below. Although these policies are directed to local municipalities in the Region and not applicant's submitting development applications, it is still important to note how the proposed development aligns with this criteria.

Criteria	Discussion of Conformity
a) achieves the minimum density targets set out in Table 2 (160 peoples and jobs per gross hectare measured over the entire station area);	The proposed development contributes to meeting the minimum density target of 160 people and jobs per gross hectare. With 2,438 dwelling units, 3,206 bedrooms, and 1,532 m² of retail/commercial space, the project delivers a substantial increase in population and employment potential within the MTSA. This aligns with the City and Region's objectives to concentrate growth in strategic locations and optimize the use of existing and planned transit infrastructure.
b) is transit-supportive, supports planned transit service levels, and prioritizes access to the station area and connections to any nearby major trip generators by providing: (i) connections to regional and provincial transit services to support transit service integration; and (ii) mobility networks for walking, cycling, and rolling, including sidewalks, bicycle lanes, and secured bicycle parking;	(i) The subject lands are located within walking distance of both the Research and Technology and University of Waterloo ION stations. These ION stations connect to GRT services and offer indirect access to regional and intercity transit through nearby terminals such as the University of Waterloo's East Campus bus terminal. As such, the development benefits from and supports broader regional transit integration. (ii) The development emphasizes multimodal access, with 1,605 bicycle parking spaces, walkable streetscapes, and proximity to the Laurel Trail and bike lanes along Columbia Street West. A proposed 9.0 metre public right-of-way will further enhance pedestrian connectivity and active transportation infrastructure in the area.
c) provides for a diverse mix of uses, including additional residential units and affordable housing, where residential uses are permitted, to support existing and planned transit service levels;	The development includes a diverse mix of high-density residential and commercial/retail uses, supporting both local needs and transit ridership. While affordable housing is not required through inclusionary zoning at this time, the significant number of new residential units introduced will help increase housing supply and choice within the MTSA.
d) fosters collaboration between public and private sectors, such as joint development projects;	While this application is not a joint development project in a formal sense, the proposal has been advanced through ongoing coordination with City staff, particularly with regard to the integration of the new 9.0 metre public right-of-way and the proposed POPS. The applicant is also proposing to convey the POPS to the City to satisfy part of the parkland dedication

		requirement, further demonstrating public-private collaboration.
e)	provides alternative development standards, such as reducing or eliminating minimum automobile parking standards, or providing maximum parking standards, for uses near transit routes, to maximize intensification opportunities and minimize surface parking areas;	The proposed development includes low parking ratios appropriate for the transit-supportive context and concentrates the vast majority parking within two levels of underground parking. Minimal surface parking is proposed which would be suitable for deliveries and short term visits to the development. The parking scheme contemplated is consistent with policies seeking to reduce reliance on automobiles and promote compact, transit-oriented development.
f)	prohibits land uses and built form that would adversely affect the achievement of the minimum density targets set out in Table 2;	The proposed high-density, mixed-use built form is entirely consistent with achieving the minimum density target. The development maximizes land efficiency and does not include low-density or auto-oriented uses that would hinder intensification objectives.
g)	protects existing significant employment uses by ensuring land use compatibility with adjacent new development;	The proposed mixed-use development is compatible with adjacent employment uses, including office and institutional uses. The high-density residential and commercial nature of the proposal complements existing uses and introduces additional customers and potential talent to nearby employers, fostering economic synergies.
h)	supports the implementation of inclusionary zoning by identifying: (i) the authorized uses of land in the station area and of buildings or structures on lands in the area; and (ii) the minimum densities that are authorized with respect to buildings and structures on lands in the station area; and	Although inclusionary zoning has not yet been implemented in the City of Waterloo, the proposal includes clearly defined residential and commercial uses consistent with the City's direction for MTSAs. The requested Official Plan and Zoning By-law Amendments would enable high-density built form that meets the minimum density expectations for this strategic growth area.
i)	is consistent with the relevant transit-supportive development policies of Section 2.D.6.	See the analysis provided in the following section below of this Report.

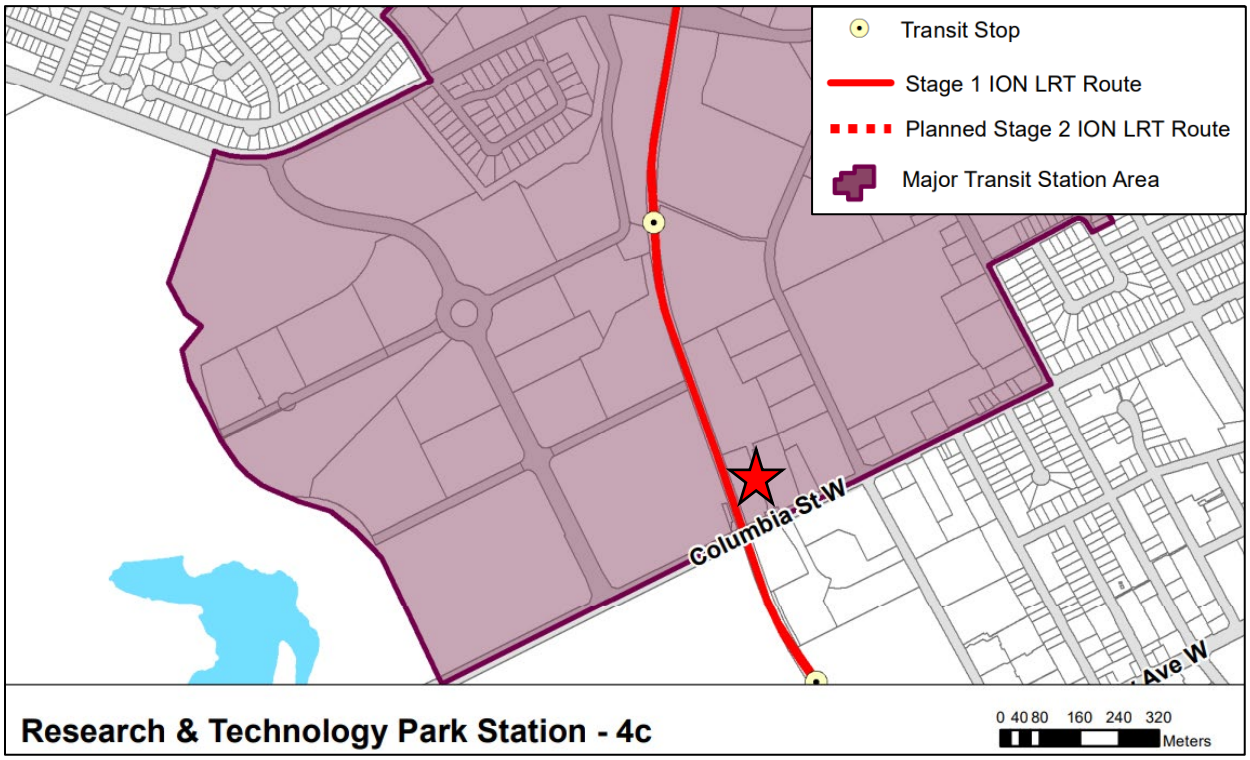


Figure 9: *ROPA 6, Figure 4c - Research & Technology Park (Major Transit Station Areas)*

iv. Transit-Supportive Development Policies

Section 2.D.6.1 of ROPA 6 outlines the following transit supportive development criteria in reviewing and evaluating development applications or site plans, within strategic growth areas and other intensification areas:

Criteria	Discussion of Conformity
a) creates an interconnected, multimodal street pattern that prioritizes walking, cycling, and rolling, and taking transit over automobile trips, and supports vibrant mixed-use developments;	The proposed development features a highly walkable and interconnected internal circulation network, supported by direct access to Columbia Street West and the Laurel Trail, which connects to surrounding transit, cycling, and pedestrian infrastructure. With 1,605 bicycle parking spaces, limited vehicle parking, and proximity to ION LRT stations, the development prioritizes active and sustainable transportation options over automobile use. The mixed-use character of the development contributes to a vibrant, transit-supportive urban environment.
b) supports a more compact built form that locates the majority of transit supportive uses within a comfortable walking distance of a transit stop or Major Transit Station Area;	The five (5) high-density towers are situated within the Research and Technology MTSA, with the nearest ION LRT stop located within a short walking distance. The compact built form strategically locates residential and commercial uses within comfortable pedestrian reach of high-frequency transit, consistent with the City's intensification goals for MTSAs.

c)	provides an appropriate mix of land uses, including a range of food destinations, local services and amenities to meet peoples' daily needs for living;	The development incorporates 1,532 m² of commercial/retail space strategically positioned to activate primary building frontages and pedestrian routes. These uses will support the daily needs of future residents by accommodating food services, shops, and other local amenities, reducing dependency on car travel for everyday needs.
d)	promotes medium and higher-density development as close as possible to the transit stop to support higher frequency transit service and optimize transit rider convenience;	All five (5) towers, ranging from 37 to 41 storeys, are located immediately adjacent to the Columbia Street West corridor and within close proximity to two (2) ION LRT Stations. This concentration of high-density residential uses directly supports transit ridership and enhances service efficiency by placing thousands of potential users in close proximity to the station area.
e)	supports a high quality public realm to enhance the identity of the area and create gathering points for social interaction, community events and other activities; and	The development includes 21,994 m² of combined amenity space, including a 1,896 m² centrally located POPS. This open space is framed by surrounding towers, designed to serve as a public gathering point and enhance the site's identity through high-quality landscape and placemaking features.
f)	provides access from various transportation modes to the transit facility, including consideration of pedestrian, bicycle parking, and where applicable, passenger transfer and commuter pick-up/drop off areas.	The site provides excellent multimodal access with connections to the ION LRT, GRT bus routes, and the Laurel Trail. Secure and abundant bicycle parking, walkable access routes, and well-designed pick-up/drop-off areas near building entrances ensure that all modes of transportation are accommodated and integrated into the overall site design.

Based on the foregoing, it is our opinion that the proposed development conforms to the policies of ROPA 6.

e) City of Waterloo Official Plan (2012)

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

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

planning pressures and strategic priorities. The City has completed Phase 1, whereby the City of Waterloo adopted Official Plan Amendment No. 58 (OPA 58) as part of its Official Plan Review process in December 2024. OPA 58 is discussed further in Section 6.f) of this Report.

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

i. Land Use Designation – Business Employment

The subject lands are currently designated 'Employment', as per Schedule 'A' in the Official Plan (Figure 9). As per Section 10.3 of the Official Plan, the 'Employment' land use designation permits a broad range of employment uses. Complementary uses, where permitted, are anticipated to directly support the primary employment use on the lands and adjacent area. Ancillary uses, where permitted, are anticipated to provide opportunities for mixed-use developments within specific Employment land use designations and are intended to permit uses that directly support the primary employment use on the lands and adjacent area.

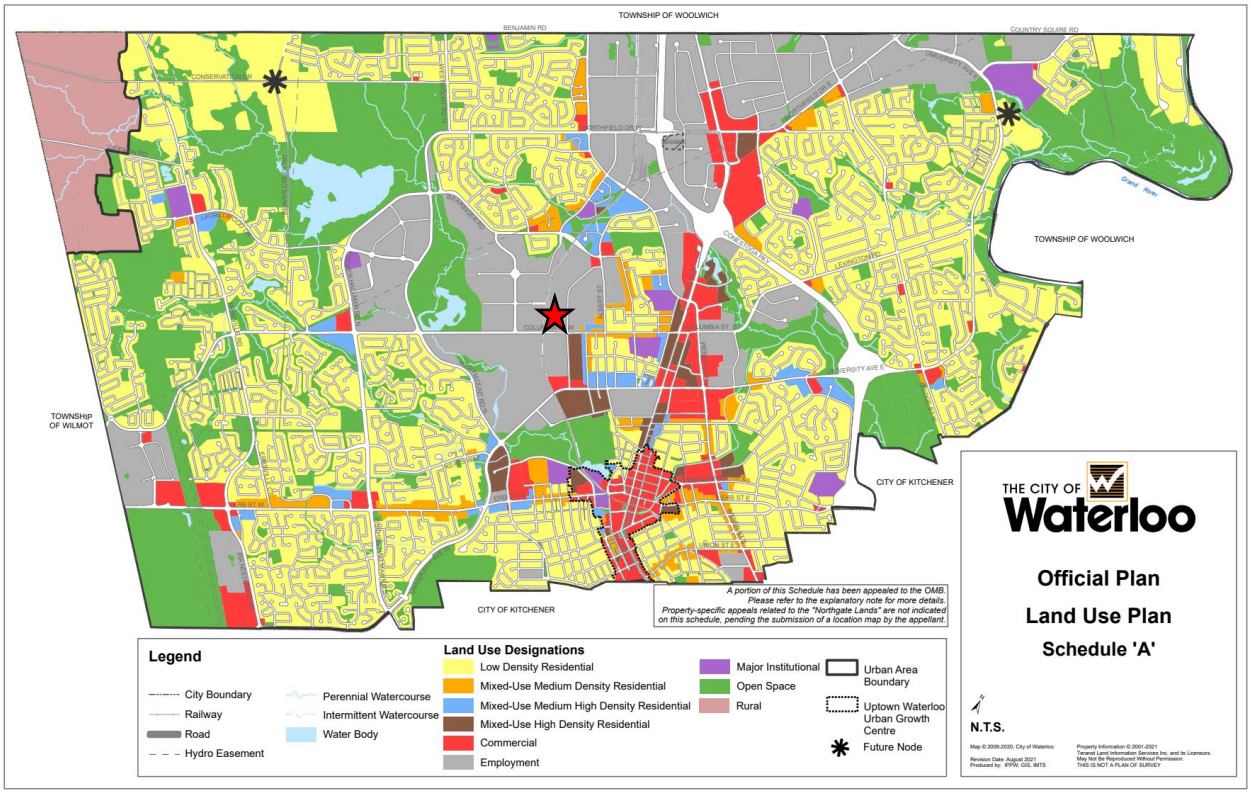


Figure 10: *City of Waterloo Official Plan, Schedule 'A' (Land Use Plan)*

Section 10.3.1(1) of the Official Plan notes that the 'Employment' land use designation is broken into three (3) distinct designations, being 'Flexible Industrial', 'Business Employment', and 'Academic'. As per Schedule 'A2' of the Official Plan, the subject lands are specifically designated 'Business Employment' (Figure 10).

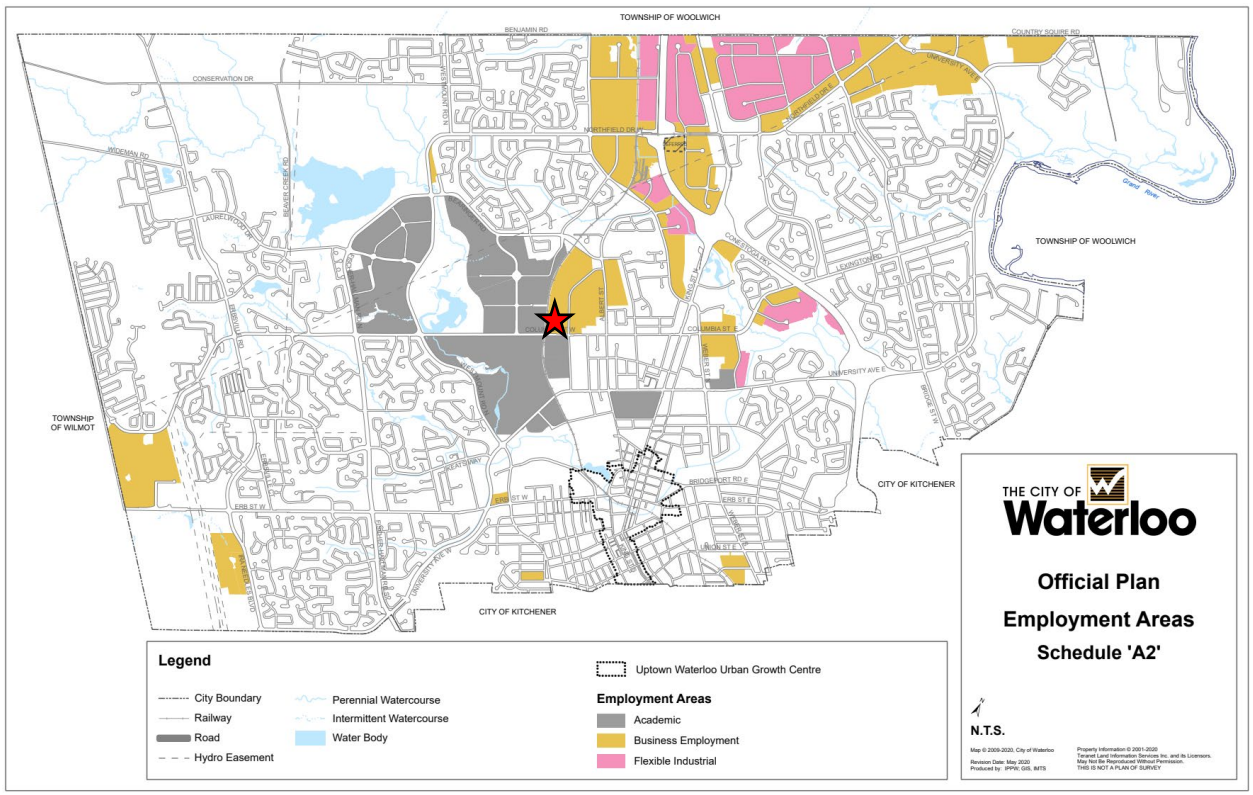


Figure 11: *City of Waterloo Official Plan, Schedule 'A2' (Employment Areas)*

Section 10.3.1(8) of the Official Plan emphasizes land use compatibility near LRT corridors, particularly within MTSAs. It outlines that if employment lands are considered for conversion during a municipal comprehensive review, priority will be given to properties within Potential Transition Areas shown on Schedule 'J', especially those adjacent to higher-order transit corridors like the ION LRT which includes the subject lands. As noted previously, by way of ROPA 6 which included a municipal comprehensive review of employment lands, the subject lands are no longer designated for employment purposes in the Regional Official Plan. The Official Plan Amendment proposed will in part reflect that the lands are no longer protected employment lands. Properties with direct access to active or convertible frontages are preferred for mixed-use development, as they better support the vision of creating vibrant, mixed-use, employment-focused station areas. The policy aims to guide the transformation of key sites to align with intensification and transit-supportive planning goals.

The proposed development aligns with the intent of the City of Waterloo's policy on land use compatibility within MTSAs. Although the subject lands are currently identified as 'Business Employment', OPA 58, adopted by Council as part of the City-led Official Plan Review, proposes to re-designate the lands as 'Station Area Mixed-Use'. This reflects the City's vision to support the transformation of key sites within proximity to higher-order transit into vibrant, transit-oriented, mixed-use communities. As per Council decision to adopt OPA 58, pending approval from the Province, the lands would no longer be considered employment lands. The proposed development supports this shift in land use policy by contributing to a compact, mixed-use form that is well-integrated with the surrounding transit infrastructure, consistent with the goals for intensification and placemaking in MTSAs.

Section 10.3.1(9) of the Official Plan outlines how employment land conversions, when approved through a municipal comprehensive review, must be implemented through an updated Official Plan framework that ensures the area continues to support employment and is compatible with surrounding uses. Specifically, it requires:

- Minimum employment densities to be maintained alongside non-employment uses;
- Built form standards, such as mandating mixed-use buildings;
- Clear policies on permitted building heights and densities; and
- Phasing requirements and potential holding provisions to ensure that new sensitive land uses (like residential) are introduced appropriately based on the surrounding context.

The goal is to ensure that even when land use shifts from employment to mixed-use, it still supports employment and integrates well with existing and planned uses.

The proposed development is consistent with the City of Waterloo's policy framework for employment land conversions, as outlined in Section 10.3.1(9) of the Official Plan. Importantly, ROPA 6 and City of Waterloo OPA 58 previously addressed the requirements set out in this policy. As a City-led initiative, OPA 58 represents a planned and strategic approach to land use transition, aligning with broader municipal and regional growth objectives.

Council-adopted OPA 58 proposes to redesignate the subject lands from ‘Business Employment’ to ‘Station Area Mixed-Use,’ thereby enabling a broader mix of uses that reflect the evolving urban context around Major Transit Station Areas. In doing so, it establishes a new policy framework that responds directly to the Official Plan's employment conversion criteria.

Overall, it is our opinion that proposed development is fully aligned with the direction and policy structure of OPA 58 and the broader objectives of the Official Plan regarding the responsible and coordinated conversion of employment lands. This ensures that the development contributes to a complete, transit-supportive, and economically diverse community. A detailed review of the proposed ‘Station Area Mixed Use’ land use designation is discussed further in Section 6.f) of this Report.

ii. Nodes and Corridors – Major Node

The subject lands are designated ‘Major Node’, as per Schedule ‘B’ of the Official Plan (Figure 11). Section 3.6.1 of the Official Plan states that ‘Major Nodes’ are planned as medium high to high density mixed-use areas that accommodate a range of uses, which may include residential, commercial, employment, social, cultural, recreational and institutional uses. Commercial uses that provide for the day-to-day and weekly shopping needs of several surrounding neighbourhoods will be encouraged and, where appropriate, Major Nodes shall be planned to accommodate small to medium-sized food stores, with the objective that all residents will have access to a food store within two kilometres of their residence. Employment areas that are located within Major Nodes will be planned to support Major Nodes as a destination, and in order to provide such support, are not contemplated to be converted to non-employment uses.

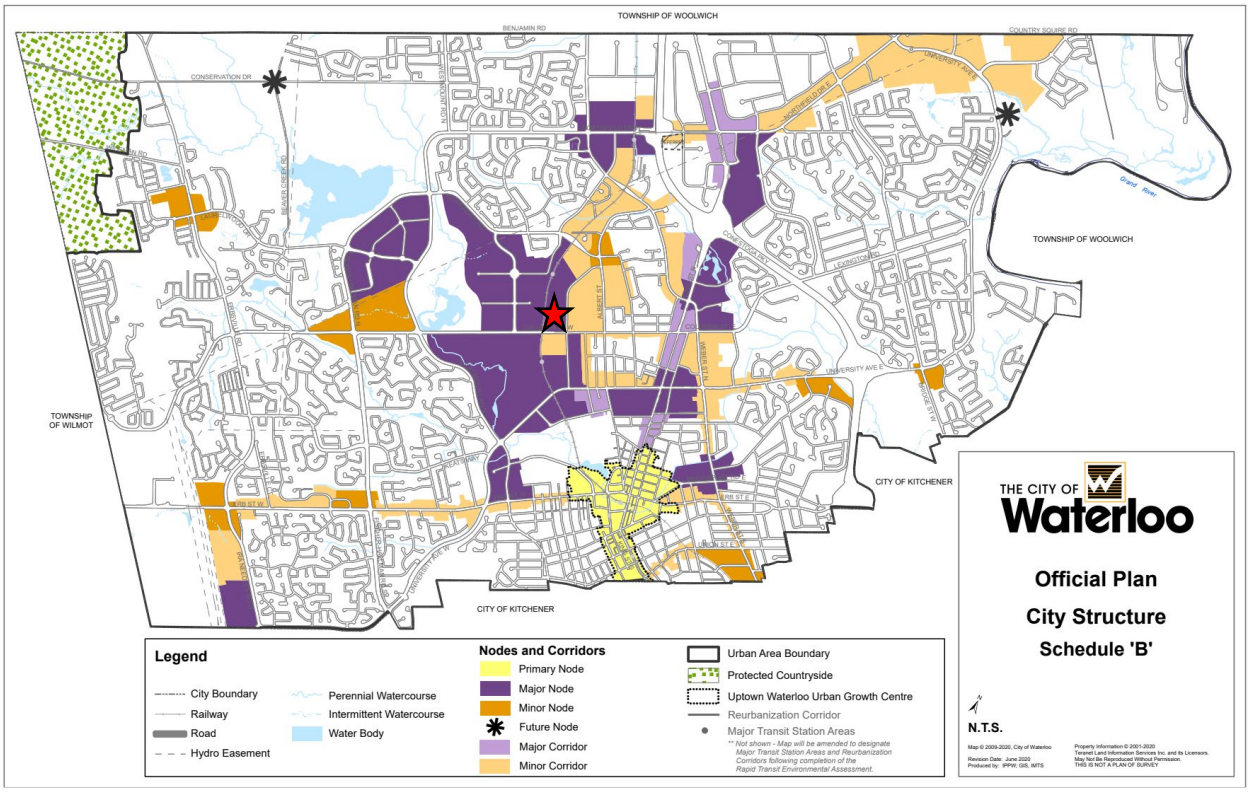


Figure 12: *City of Waterloo Official Plan, Schedule 'B' (City Structure)*

While the subject lands are currently designated as 'Major Node' in the City's Official Plan and are within an employment area, OPA 58 proposes to remove the employment land designation from the site and re-designate it as 'Station Area Mixed-Use.'. As such, the policies restricting the conversion of employment lands within 'Major Nodes' are no longer applicable to the subject lands pending Provincial approval of OPA 58.

Section 3.6.5 of the City of Waterloo Official Plan outlines policies to guide intensification within designated 'Nodes and Corridors', which are areas identified for medium to high-density development. It is our opinion the proposed development aligns well with the intent and policies of Section 3.6.5, as it encourages intensification within Nodes and Corridors through medium to high-density development that supports transit, community infrastructure, and an animated public realm. The following describes how the proposed development aligns with the criteria of Section 3.6.5:

Criteria	Discussion of Conformity
1) Mixed-use development will be encouraged within the designated Nodes and Corridors, where appropriate, provided the land use designation and zoning support such mixed-use development. It is not the intent of this Plan that all lands within Nodes and Corridors will accommodate a full mix of uses and direction will be provided in this regard through the land use designations applied to the lands.	The proposal includes a mix of residential and non-residential / commercial uses, consistent with the direction of OPA 58 and the 'Station Area Mixed-Use' designation.

2)	High Density, Medium-High Density and Medium Density land uses will be encouraged to locate in designated Nodes and Corridors and therefore in proximity to major roads, major community infrastructure, public transit routes, and other supporting land uses.	The development provides high-density residential units in close proximity to ION LRT stations, GRT routes, and major roads.
3)	Construction of new low density uses will be discouraged within designated Nodes and Corridors. Development applications, excluding applications for site plan approval, proposing such uses will be reviewed in the context of the policies in this chapter, with particular emphasis on section 3.8 for any development application, excluding applications for site plan approval, within Major Transit Station Areas.	No new low-density uses are proposed; the development supports compact, high-density built form.
4)	Intensification of existing low density housing to higher density multiple residential buildings will be encouraged in designated Nodes and Corridors by the application of minimum densities on residential lands.	The proposal replaces underutilized low-density office development with high-density, transit-supportive buildings.
5)	Lot consolidation shall be encouraged to provide properties of sufficient size that enable medium, medium-high and high density development. The Zoning By-Law may identify minimum lot sizes in designated Nodes and Corridors to ensure that an appropriate scale of development is achieved.	At this time of the Official Plan and Zoning By-law Amendment stage, both 170 and 180 Columbia St W will remain as distinct parcels. The proposed development contemplates a thoughtful and comprehensive, large-scale development that maximizes the land area.
6)	In addition to general urban design policies that apply city-wide, area- specific urban design policies for designated Nodes and Corridors shall also apply, as found in policy 3.11.2 of this chapter	The design of the development reflects urban design principles and will be guided by applicable area-specific design policies. An Urban Design Brief was prepared by Up Consulting Ltd. in support of the applications which addresses all of the applicable urban design policies.
7)	The City, in consultation with the Municipal Heritage Committee, encourages adaptive reuse of historically significant built resources, and requires the conservation of cultural heritage resources in all areas of the City, including designated Nodes and Corridors.	Not Applicable.

Section 3.6.6 of the Official Plan provides policy direction with respect to parking within designated Nodes and Corridors. This Section focuses on parking strategies within designated Nodes and Corridors, emphasizing a shift away from automobile dependency. The policy encourages underground and structured parking over surface lots, which should be minimized and well-screened where possible. It supports transportation demand management and the promotion of

transit and active transportation. Parking standards will be defined in the Zoning By-law and may include maximum surface parking limits, reduced requirements near transit or shared parking facilities, and provisions for short- and long-term bicycle parking.

The proposed development appropriately aligns with Section 3.6.6 of the Official Plan by minimizing surface parking and prioritizing more intensive parking forms. The majority of parking will be provided underground; with only a limited amount of surface parking intended for short-term use located adjacent to the towers. Importantly, this surface parking will be screened from the public realm along Columbia Street West, as it will be situated behind the proposed buildings. In addition, the development will incorporate both short-term and long-term bicycle parking spaces, further supporting the City's objectives to reduce automobile dependence and encourage active transportation. This approach contributes to a pedestrian-friendly environment and supports transit-oriented development within designated Nodes and Corridors.

iii. Height and Density – High Density Employment, 81 metres

The subject lands are within the 'High Density Employment, 81 metres' designation, as per Schedule 'B1' of the Official Plan (Figure 12). As per Section 3.4(1) of the Official Plan, the maximum permitted height on the subject lands is 81 metres within this designation. Further, it should be noted that this designation does not have any minimum or maximum density requirements, as per Section 3.4(2) of the Official Plan.

The proposed development would exceed the maximum height requirement of 81 metres, as a maximum height of 130 metres is proposed. Therefore, an Official Plan Amendment would be required to permit the proposed maximum height of 130 metres, and update Schedule 'B1' of the Official Plan. While discussed further in Section 6.f) of this Report, the permitted maximum height on the subject lands was amended as part of adopted OPA 58 to maximum of 30 storeys to align with the proposed 'Station Area Mixed-Use' designation. No density requirements are proposed for the 'Station Area Mixed-Use' designation, so this remains the same as the in-force and effect Official Plan.

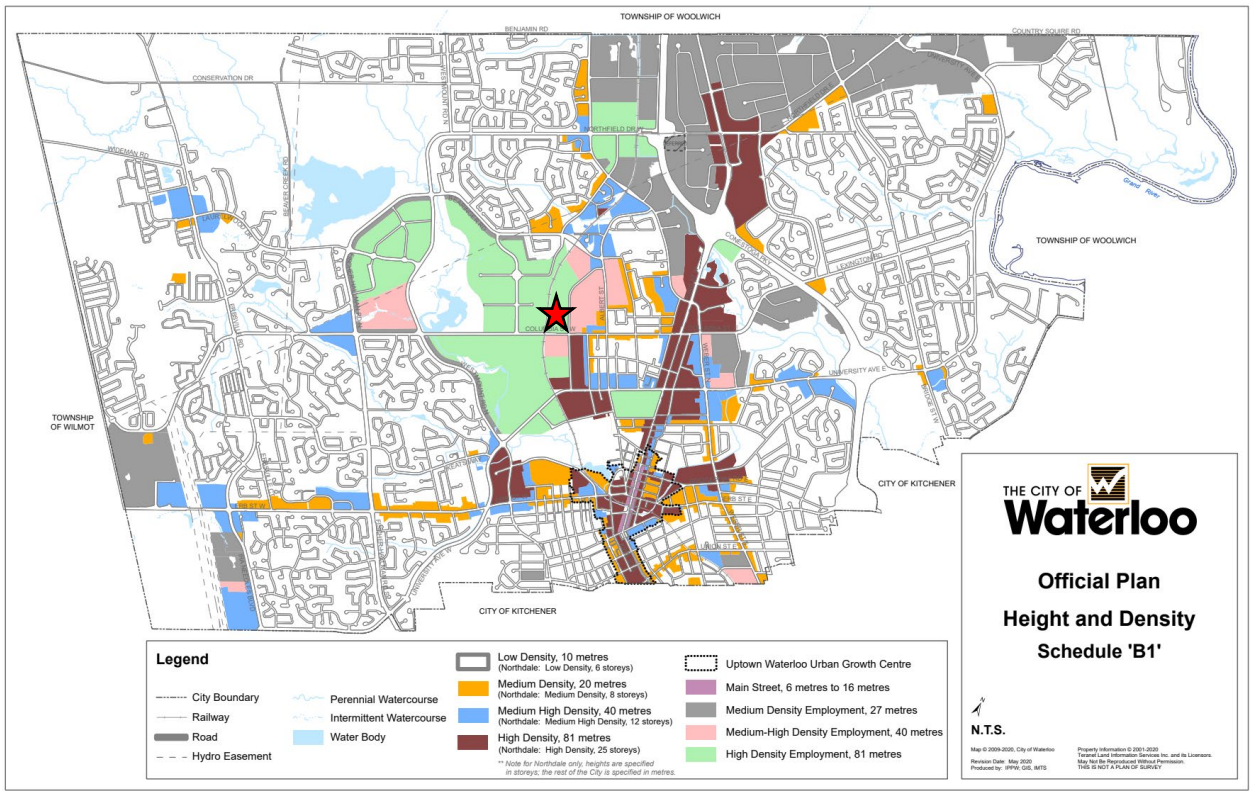


Figure 13: *City of Waterloo Official Plan, Schedule 'B1' (Height and Density)*

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

Section 8.3.3.1 of the Official Plan establishes Source Water Protection Areas as "areas that contribute water, or are in close proximity, to municipal drinking-water supply wells that are vulnerable to contamination and/or depletion from incompatible land uses". The south-western corner of the subject lands is located within a Wellhead Protection Sensitivity Area (WPSA) 8 of the Official Plan (Figure 13), consistent with the designation identified in the ROP. As previously mentioned, it is our opinion that the proposed mixed-use development would not have adverse impacts to groundwater. Therefore, it is our opinion that the proposed development conforms to the Source Water Protection policies in the City's Official Plan.



Figure 14: *City of Waterloo Official Plan, Schedule 'B4' (Source Water Protection Areas)*

v. Road Classification – City Arterial

The subject lands front Columbia Street West which is identified as a 'City Arterial' road in Schedule 'E' of the City of Waterloo Official Plan (Figure 14). As per Table 5-1 of the Official Plan, 'City Arterial' roads serve a primary function of people and goods movement and a secondary land use access function, facilitating the movement of large volumes of people, including truck traffic, within the City. They also regulate access to abutting lands except where existing development makes this impractical; access is normally provided from Collector Roads.

It is our opinion that the proposed development is supportive of the municipal road system. As summarized in Section 8 of this Report, the Traffic Impact Assessment prepared by GHD as part of the complete submission package notes that the proposed redevelopment can be supported by the existing and planned transportation infrastructure. The proposed development will have continued access along Columbia Street West, is within immediate proximity to public transit, and will offer 1,605 bicycle parking spaces.

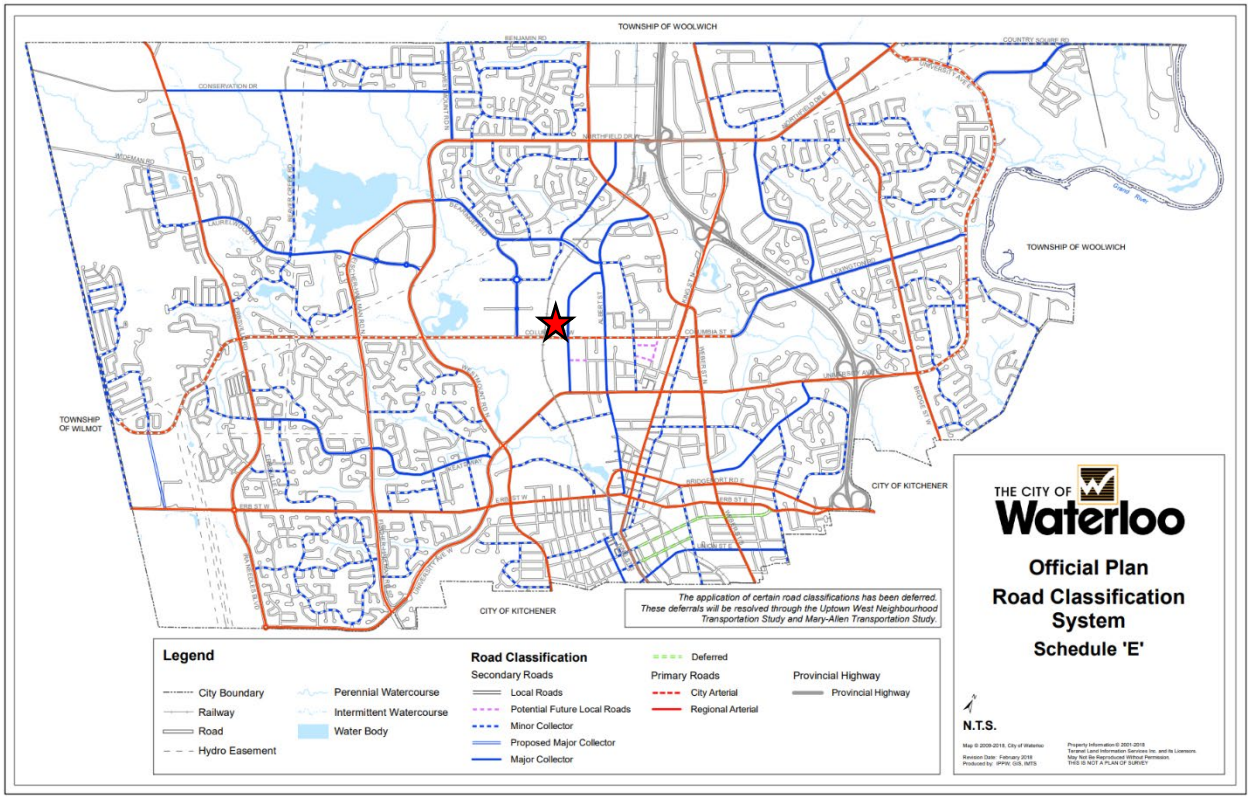


Figure 15: *City of Waterloo Official Plan, Schedule 'E' (Road Classification System)*

vi. Active Transportation Framework

The subject lands are adjacent to the existing 'City-Wide Cycling and Multi-Use Routes' along Columbia Street West, as well as the Laurier Trail to the west of the lands, as per Schedule 'F' of the City of Waterloo Official Plan (Figure 15). Further, a 'Active Transportation Corridor (Conceptual)' traverses between the subject lands. It is understood that this conceptual corridor follows the existing access, to remain, that runs between the sites.

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

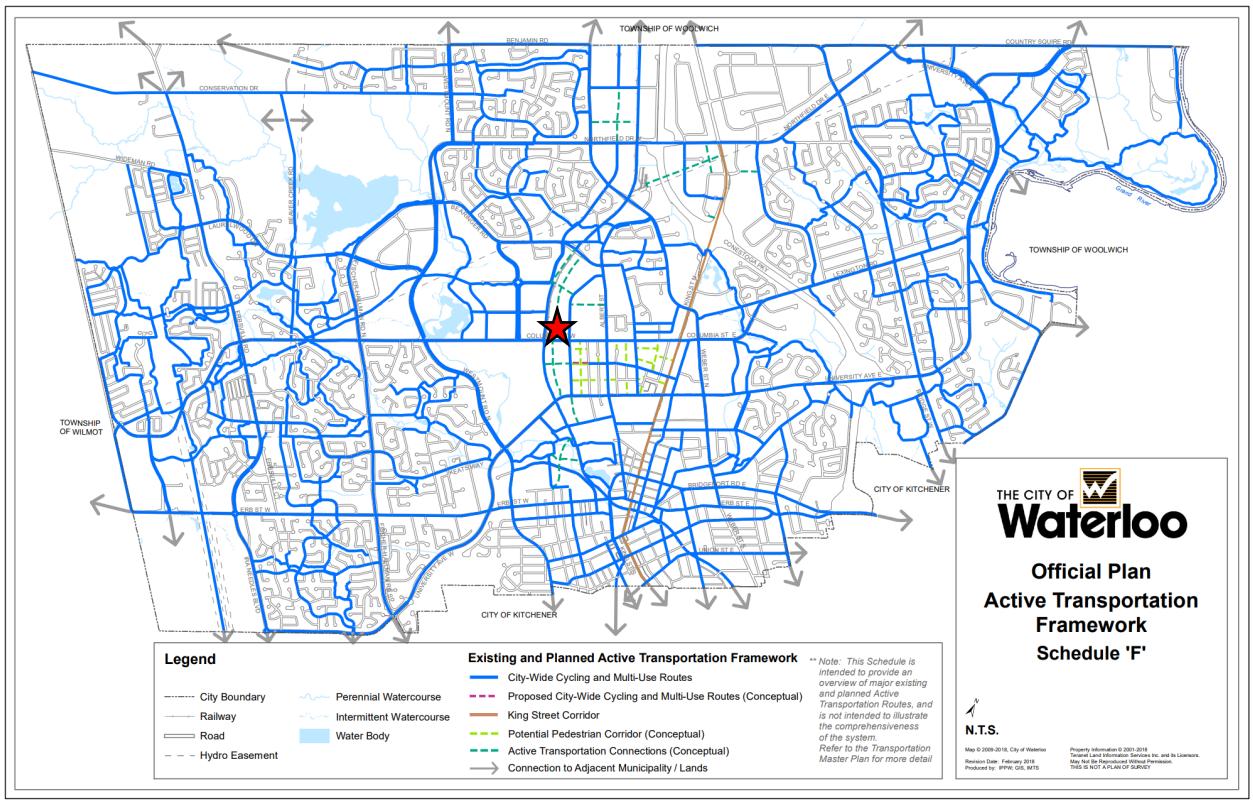


Figure 16: *City of Waterloo Official Plan, Schedule 'F' (Active Transportation Framework)*

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

Schedule 'J3' of the Official Plan identifies the subject lands as being located within the Research and Technology Park Station Area (Figure 16). As per Section 3.8 of the Official Plan, the City will plan for densities in MTSAs to increase over time, with 160 residents and jobs combined per hectare being the planned density target for 2041. The City will review and increase density targets through future Official Plan Reviews, and future City-initiated Official Plan Amendments. While discussed further in Section 6.f) of this Report, the minimum density targets for MTSAs remains the same at 160 residents and jobs combined per hectare in the adopted OPA 58.

Further, Section 3.8 of the Official Plan outlines the vision for MTSAs as vibrant, high-density, mixed-use hubs that support transit use and active transportation. These areas are to achieve a minimum combined density of 160 residents and jobs per hectare by 2041 or earlier through appropriate zoning and development standards. MTSAs are intended to accommodate a mix of transit-supportive uses, serve as focal points for active transportation networks, and reflect the unique character of each area. They should also promote economic development, enhance place-making through both public and private realm improvements, and ensure seamless connections between various mobility systems.

The proposed development directly supports the objectives for MTSAs as outlined in Section 3.8 of the Official Plan. It contributes toward achieving the minimum gross density target of 160 residents and jobs per hectare by introducing a compact, high-density built form that will include a mix of residential and non-residential uses.

The proposal introduces a mix of uses that create both origins and destinations for transit users, enhancing the functionality and appeal of the MTSA. Its location near higher-order transit and incorporation of active transportation infrastructure, including internal sidewalks, walkways, and long- and short-term bicycle parking, help establish the site as a key node within the broader pedestrian and cycling network. The development fosters place-making through high-quality design, landscaping, and integration with an enhanced pedestrian corridor that traverses the site, supporting connectivity and accessibility.

Furthermore, the proposal reflects and builds upon the character of the station area by integrating new residential uses, fostering public realm improvements, and contributing to commercial vitality. As a transformative project, it supports the City's goals for economic development, sustainable mobility, and vibrant, complete communities within MTSAs.

Section 3.8.1 of the Official Plan outlines the intended land uses within MTSA, emphasizing a focus on transit-supportive, higher-density development. It encourages medium to high-density residential, commercial, and employment uses, while discouraging lower-density, car-oriented developments. Station Area Plans guide land use changes through a proximity-based approach, with more intensive, connected, and active uses planned closest to LRT stops, transitioning to less intensive uses further away. Changes to MTSA boundaries require an Official Plan Amendment, though minor adjustments to internal planning areas (Areas A and B) only require zoning amendments.

The proposed development aligns with the policies of Section 3.8.1 of the Official Plan by introducing a high-density, mixed-use form that supports the goals of transit-oriented development within an MTSA. The planned residential and non-residential components are transit-supportive uses, consistent with the intent to encourage medium to high-density development near LRT stops. The site's location within close proximity to a higher-order transit corridor makes it a suitable candidate for intensification and aligns with the Station Area Plan's proximity-based framework, which promotes greater activity and connectivity near transit infrastructure. The development's integration of pedestrian-oriented design elements and cycling infrastructure supports connectivity and placemaking objectives across the MTSA. Furthermore, as the lands are proposed to be redesignated under OPA 58, the development reflects the City's evolving land use vision for the area and demonstrates compatibility with both the planned function and character of the MTSA. It should also be noted that the proposed development does not contemplate changes to the MTSA boundary and will remain within the boundary.

Section 3.8.1, specific to 'Area A' identified within MTSAs, also sets out a policy framework that prioritizes pedestrian-oriented, high-intensity mixed-use development in areas closest to LRT stops. These lands are to become vibrant, compact activity nodes with active streetscapes that discourage automobile dependency. The policy restricts new auto-oriented uses and surface parking, encourages active or convertible frontages at the ground level of buildings, and mandates building design elements like minimal setbacks and strong street presence to promote walkability. Parking provisions must support reduced automobile reliance and promote cycling and transit use. Drive-through facilities are generally prohibited but may be considered under strict criteria through comprehensive planning applications if they do not compromise pedestrian safety, streetscape continuity, or overall density and design objectives.

The proposed development aligns closely with the policy direction for ‘Area A’ within the MTSA, as outlined in Section 3.8.1 of the Official Plan. Situated within close proximity to an LRT stop, being the Research and Technology Station, the development has been designed to support a high-intensity, pedestrian-oriented, mixed-use environment. The built form emphasizes compact design with strong street relationships and active frontage along key pedestrian corridors, contributing to an animated and engaging public realm.

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

Section 3.8.2 of the Official Plan emphasizes enhancing the public realm within MTSAs. It encourages the creation and improvement of parks, plazas, and open spaces to support growing populations and foster community interaction. These spaces, identified in Station Area Plans, may be secured through development approvals. The City may designate key "priority public spaces" as conceptual focal points essential to the function of the MTSA. Additionally, detailed design studies or master plans may be required to guide development and ensure cohesive built form and public/private realm improvements.

The proposed development aligns with Section 3.8.2 of the City of Waterloo Official Plan by supporting a high-quality public realm and meaningful place-making within the Major Transit Station Area (MTSA). A central pedestrian-oriented corridor will traverse the site from north to south, providing enhanced internal walkways, landscaping, and connectivity that prioritize pedestrian comfort and accessibility. This corridor will act as an informal green space and gathering area, contributing to a welcoming and interactive public realm.

Additionally, the development proposes a POPS to be completed as part of Phase 2. This POPS will further enhance opportunities for public interaction, support green infrastructure objectives, and contribute to the vibrancy of the area by serving as a focal point for residents, workers, and visitors. The POPS space will be integrated with the pedestrian network and will be designed with urban design principles in mind, including quality landscaping, seating, and a welcoming character that reinforces place-making goals.

Section 3.8.3 of the Official Plan outlines strategies to improve local mobility within MTSAs. Key elements include developing conceptual street cross-sections to support multimodal transportation, enhancing connectivity on both public and private lands, and encouraging a finer-grained street and block network. Mobility improvements—especially for walking and cycling—are to be secured through the development approvals process. The City may identify priority mobility connections on Station Area schedules, though their specific locations are conceptual unless explicitly tied to a property.

The proposed development directly supports the City's mobility objectives within the MTSA. The design incorporates a central internal pedestrian corridor that traverses the site from north to south, enhancing connectivity across the property and providing a direct link to existing and planned active transportation routes, including those along Columbia Street and nearby trails such as the Laurier Trail. This corridor creates an additional, safe, and attractive pedestrian connection within the area.

The development also includes dedicated short-term and long-term bicycle parking facilities, which further encourage multimodal transportation and support reduced automobile reliance. Through these features, the development fosters active transportation, supports improved local mobility, and aligns with the City's vision for a well-connected, pedestrian-oriented station area. These improvements are consistent with the conceptual mobility strategies identified in the Official Plan.



Figure 17: *City of Waterloo Official Plan, Schedule 'J3' (Research and Technology Station Area)*

viii. Urban Design

Section 3.11 of the current Official Plan provides policy direction with respect to urban design in the City of Waterloo. As such, an Urban Design Brief has been prepared by Up Consulting Ltd. as part of the complete application submission. The Brief provided an overview of the urban design framework applicable to the site, the existing conditions of the property and its neighbourhood context and summarized how the design of the proposed development reflects

the urban design policies and objectives of the City of Waterloo Official Plan and Urban Design Manual.

f) City of Waterloo Official Plan Amendment No.58

The City of Waterloo is currently undergoing a review of their Official Plan. It is understood that the City is conducting their Official Plan Review in "Phases", which allows for key chapters in the City Official Plan to be updated in the short term, in response to current planning pressures and strategic priorities. The City has completed Phase 1, whereby the City of Waterloo adopted OPA 58 as part of its Official Plan Review process in December 2024. The intent of OPA 58 was to align the City's Official Plan with various provincial legislative changes such as Bill 23, 109 and 185, the new PPS 2024, and the Region of Waterloo Official Plan (specifically ROPA 6).

The final implementation of the adopted OPA 58 is still subject to the approval of the Minister of Municipal Affairs and Housing, which is anticipated in 2025. Therefore, OPA 58 is not in-force and effect at this time. Notwithstanding this, the following subsections of this Report provide an analysis of the Council adopted OPA 58 and how the proposed development meets the overall intent, goals and objectives of the amendment.

Further, it is understood that OPA 58 did not address nor modify Schedules 'B4', 'C', 'D', 'F', or 'G', which were discussed above in Section 6.e) of this Report. As such, the following subsections below only address Schedules or policies that have been modified and/or pertain to the subject lands.

i. Land Use Designation – Station Area Mixed-Use

The subject lands are proposed to be designated as 'Station Area Mixed-Use' in Schedule 'A' of OPA 58 (Figure 17). Should the Province approve OPA 58, the subject lands would no longer be considered employment lands in the Official Plan and would be subject to the 'Station Area Mixed-Use' designation policies. As noted in Section 6.d.ii) of this Report and consistent with ROPA 6, by way of OPA 58 the subject lands will no longer be designated for employment purposes. It is understood that, as a continuation of the Region's employment area municipal comprehensive review, OPA 58 identifies a new land use designation for employment areas within MTSAs, being the 'Station Area Mixed-Use' designation. This designation applies to large sites that are converted from employment, as identified in the Region's Municipal Comprehensive Review and ROPA 6.

Section 10.5 of OPA 58 outlines the vision and planned function of the 'Station Area Mixed-Use' designation, which encourages a full mix of land uses and supports significant intensification within MTSAs. This designation promotes vibrant, transit-oriented communities through mixed-use developments that include both residential and non-residential components. The policy emphasizes mobility improvements, placemaking, and community-building that reflect the unique character of each station area, while encouraging development to orient toward the LRT corridor and transit stops. Development is expected to align with Station Area Plans to create well-connected, attractive places to live, work, learn, and recreate.

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

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

Section 10.5(2) states that lands designated Station Area Mixed-Use shall permit building heights of up to 30 storeys as shown on Schedule 'B1'— Built Form and densities in accordance with the implementing Zoning By-law. The applicant is proposing a maximum height of 41 storeys, thus exceeding the maximum permitted height of 30 storeys. Therefore, a Site-Specific Official Plan Amendment is required to the 'Station Area Mixed-Use' designation. It is understood that Section 3.4 of OPA 58 provides policy direction and criteria for development that exceeds the maximum permitted height. An analysis of the criteria is provided in Section 6.f). iii) of this Report below, as well as Section 7 for additional planning rationale.

Section 10.5(3), (4) and (5) of OPA 58 provide a list of uses that are permitted and prohibited in the 'Station Area Mixed-Use' designation. The proposed mixed-use development will consist of both residential and non-residential uses that are permitted in this designation.

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

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

Section 10.5(8) through (14) of OPA 58 provides Development Policies for the 'Station Area Mixed-Use' designation. The following table provides an analysis of each policy, demonstrating

conformity with the proposed policies of OPA 58:

Section 10.5 (OPA 58)	Discussion of Conformity
8) The intent of this designation is to increase transit ridership, encourage walking and cycling, and to make more efficient use of the City's infrastructure and services, through the development of a mixed-use complete community. Development on land designated Station Areas Mixed-Use shall demonstrate how the intent of the designation has been achieved.	The proposed development supports the intent of the 'Station Area Mixed-Use' designation by delivering a compact, high-density, mixed-use development within walking distance of an MTSA. The proposal includes a mix of residential and non-residential uses that contribute to creating a complete community and support active transportation. Pedestrian-oriented design, enhanced public realm elements, and proximity to the ION LRT corridor will help increase transit ridership, encourage walking and cycling, and promote the efficient use of existing infrastructure and services.
9) The range of uses outlined in policy 10.5 (3), including employment, commercial, community and residential uses, shall be used in combination to create comprehensively planned mixed-use areas and sites, and to contribute to achieving the minimum Staton Area density target of 160 residents and jobs per hectare.	The proposed development includes a strategic combination of residential and non-residential uses that aligns with the intent of Policy 10.5(9). By integrating a mix of uses on-site—including high-density residential units and at-grade non-residential space—the development contributes to a comprehensively planned mixed-use area. This mix of land uses supports a vibrant, transit-oriented community and assists in achieving the minimum Station Area density target of 160 residents and jobs per hectare, consistent with the City's growth and intensification objectives.
10) New development shall demonstrate how buildings and sites will facilitate the achievement of the minimum Station Area density target of 160 residents and jobs per hectare.	The proposed development supports the achievement of the minimum Station Area density target of 160 residents and jobs per hectare through the provision of a high-density built form that includes 2,438 residential units combined with ground-floor non-residential uses. The design and scale of the development optimizes site utilization and contribute to the overall population and employment density within the Station Area. The proposal's compact urban form, proximity to higher-order transit, and integration of mixed uses ensure that the density target is both achievable and sustainable over the long term, in alignment with the City's intensification objectives for transit-supportive growth.

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

commercial, and/or employment uses.	
12) Large developments with greater than 1,000 residential units should accommodate two square metres or more of commercial, employment, and/or community uses for every residential unit proposed. a) For clarity, for the purposes of calculating non-residential uses as outlined in policy 10.5 (12), any consideration of community uses shall exclude open space, temporary farmers' markets and community garden uses. b) Planning for employment and office uses, large developments shall demonstrate that the proposed development will achieve a minimum employment density of 35 jobs per hectare.	a) The proposed development includes a total of 2,438 residential units, which would require a minimum of 4,876 m² of commercial, employment, and/or community space based on the guideline of two square metres per unit: 2,438 units × 2 m² = 4,876 m². The development proposes approximately 3,428.0 m² of commercial/retail/community space distributed across the subject lands. More specifically, 2,517 m² is proposed for Phases 1 and 2 (170 Columbia St W) which includes the POPS, and 911 m² is proposed for Phases 3 to 5. b) While employment and office uses are not currently proposed, the planned commercial and community functions are expected to contribute to job creation and support the goals of the Station Area Mixed-Use designation. It is our opinion that this subsection is not applicable due to the absence of dedicated employment/office uses.
13) Development of mixed-use buildings within the Station Area Mixed-Use designation shall include, but not be limited to the following: a) Short term parking at restaurants for food delivery vehicles and customer pick-ups; b) Secure storage for package deliveries in high-rise buildings; c) Short-term parking for pre-ordered customer pick-ups at retail and food stores; d) Short term parking for deliveries to high-rise buildings, preferably onsite; and, e) Safe movement of bicycles and pedestrians, such as integrated bicycle and pedestrian pathways connecting to and from public rights-of-way.	The proposed development aligns with these requirements through the incorporation of functional design elements that support urban livability and convenience for all users: a) Short-term parking areas are provided adjacent to each building and are intended to accommodate a variety of short-duration uses, including food delivery vehicles and customer pick-ups. These spaces are easily accessible from building entrances and will support the operational needs of the non-residential uses on the ground floor. b) While detailed design will be confirmed through the Site Plan Approval process, the development will include dedicated areas within each building for secure package storage. These facilities will ensure efficient and secure handling of deliveries, particularly for residential and commercial tenants. c) As with food delivery vehicles, short-term parking spaces adjacent to each building will support customer pick-ups associated with non-residential uses.

	d) The development includes integrated pedestrian pathways that connect all buildings internally and to the adjacent public rights-of-way. These connections are designed to promote safe, accessible, and efficient movement throughout the site, encouraging active transportation and supporting the complete community vision.
14) Large parcels of land (2 ha or greater) and/or multi-building developments, are anticipated to be developed in two or more phases. It is the intent of this Plan that the lands be comprehensively master planned prior to development, to demonstrate and ensure: a) Connectivity and integration between the phases; b) Orderly growth and development; c) Coordination of site servicing and stormwater management; d) Public health and safety (including emergency response); e) The provision of sufficient and coordinated green spaces; f) The provision of sufficient community uses and community infrastructure; g) The provision of sufficient and well distributed commercial and employment uses; h) Cost effective development patterns; i) Vibrant and well designed private and public spaces; and j) Coordinated design standards and guidelines, including urban design.	While the subject lands are less than 2 hectares in size, the proposed development represents a large, multi-building project to be delivered over five distinct phases. In alignment with Policy 10.5(14), the project has been comprehensively planned to ensure coordinated, efficient, and high-quality development across the entire site. a) The proposal ensures continuous pedestrian, cycling, and vehicular connections across all five phases. Internal streets, pathways, and open spaces have been designed to integrate buildings and public realms in a seamless and accessible manner. b) Phasing has been strategically designed to allow for incremental development while maintaining site functionality and appropriate infrastructure at each stage. Each phase will be self-sufficient, while also contributing to the long-term vision for a complete community. c) As per the Functional Servicing and Stormwater Management Report prepared by WalterFedy, servicing and stormwater management will be developed to function cohesively across the development. Details pertaining to servicing and stormwater management will be further refined during the Site Plan Approvals process. d) Emergency access has been incorporated throughout the site with appropriate turning radii, fire routes, and access points from public roads. The plan has been reviewed to ensure compliance with emergency response standards. e) The development proposes a POPS to be completed as part of Phase 2. This POPS will further enhance opportunities for public interaction, support green infrastructure objectives, and contribute to the vibrancy of the area by serving as a focal point for residents, workers, and visitors. f) The development includes space allocations for future community uses, integrated with other site amenities to support both early and long-

term community needs. These will evolve in tandem with population growth across phases.

g) Non-residential uses are strategically distributed across the site, including prominent frontage locations and active ground-floor uses to ensure economic vibrancy, employment generation, and walkable amenities.
h) Infrastructure and servicing plans have been optimized to reduce redundancies, leveraging shared infrastructure and phased efficiencies.
i) The plan incorporates high-quality urban design principles, including active frontages, public plazas, pedestrian-oriented streetscapes, and architectural variety to foster a vibrant, inclusive environment.
j) Please see the Urban Design Brief prepared by Up Consulting Ltd. for details.

As noted in the table above, the proposed development aligns with the intent and purpose of the adopted policies listed above. While the proposed development does not meet the criteria of Section 10.5.12).a) of OPA 58, as there is a shortfall from the required 4,876 square metres, several key factors contribute to and justify this reduction. The site has been carefully designed to balance multiple competing objectives, including transit-supportive densities, active frontages, enhanced public realm elements (including a POPS in Phase 2), and underground parking. Maximizing residential density while achieving quality design has limited the ability to accommodate larger floor plates for commercial or employment uses without compromising these goals.

The site is located within an area that already contains a significant amount of commercial and retail uses south of Columbia Street and along Phillip Street in proximity to the University of Waterloo. The proposed commercial / retail uses are intended to complement these existing uses and are designed to serve the daily needs of future residents and the local community. Introducing additional non-residential space beyond what is proposed may also result in prolonged vacancies or underutilized space, which would not support the City's broader goals for vibrant, activated streetscapes.

Overall, the proposed 3,428.0 square metres of commercial/retail/community space is considered appropriate and reasonable given urban design vision and surrounding land use context. The proposed development still contributes meaningfully to the objectives of the ‘Station Area Mixed-Use’ designation by integrating non-residential uses that promote walkability, local convenience, and a complete community.

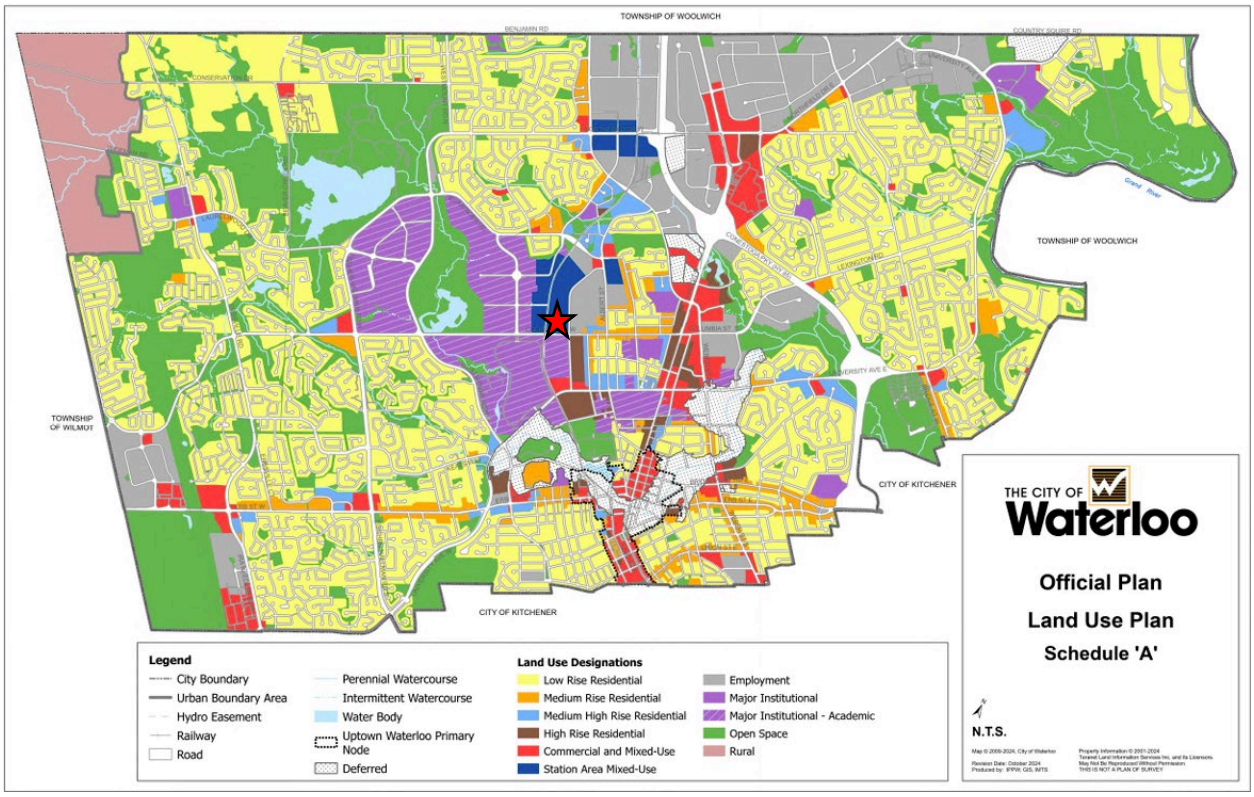


Figure 18: *Official Plan Amendment No.58, Adopted Schedule 'A' (Land Use Plan)*

ii. City Structure – Major Node

Through OPA 58 the subject lands are proposed to remain within a 'Major Node', as per Schedule 'B' (Figure 18). It is understood that Section 3.6 (Designated Nodes and Corridors) of the current in-force and effect Official Plan is to be amended to Section 3.5 and named 'City Structure', pending approval from the Province.

As per Section 3.5 of OPA 58, it is understood that the majority of new development in the city will be directed to specified urban structural components in accordance with this Plan. These urban structure components include Nodes, Corridors, Major Transit Station Areas, and Designated Growth Areas. Where authorized by this Plan, development may occur outside of these identified areas, however the majority of development will be directed to these strategic growth areas, which form the core of the City's structure.

The proposed development aligns with the overarching objective of Section 3.5 of OPA 58 by directing significant growth to an MTSA—a key component of the City's urban structure and a designated strategic growth area. Located within the Research and Technology Station Area, the subject lands are well-suited for high-density, mixed-use intensification that supports transit-oriented development. The proposal contributes to the City's planned growth framework by focusing new residential and non-residential uses within a priority area identified for intensification. This targeted approach reinforces the City's vision of compact, transit-supportive

development, while reducing pressure to accommodate growth in less suitable or peripheral areas of the city.

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

The proposed development is consistent with the policy direction for 'Major Nodes' as outlined in Section 3.5(2) of OPA 58. The development introduces a high-density, mixed-use built form that includes both residential and non-residential components, aligning with the intended function of 'Major Nodes' as vibrant, multi-functional areas. The inclusion of non-residential uses at grade creates opportunities for day-to-day services and amenities that can serve not only future residents but also the surrounding neighbourhood, thereby enhancing walkability and local convenience.

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

It should be noted that the Nodes and Corridors (now City Structure) policies in the current in-force and effect Official Plan remain largely the same from the adopted OPA 58 text, with the exception of several terminology updates and/or clerical amendments. Although OPA 58 introduces some of these changes to the City Structure policies, the overarching policy direction and intent remains unchanged. As such, the analysis provided in Section 6.e) of this Report continues to address and support the relevant City Structure policies as they exist today and as proposed under OPA 58. It is our opinion that the proposed development achieves the overarching policy direction of the Major Nodes designation by introducing a high-density, mixed-use form that supports transit-oriented development and contributes to the creation of a vibrant, complete community. Should OPA 58 be approved by the Province, it is our opinion the analysis and conclusions in Section 6.e) would continue to apply and demonstrate conformity with the updated policy framework.

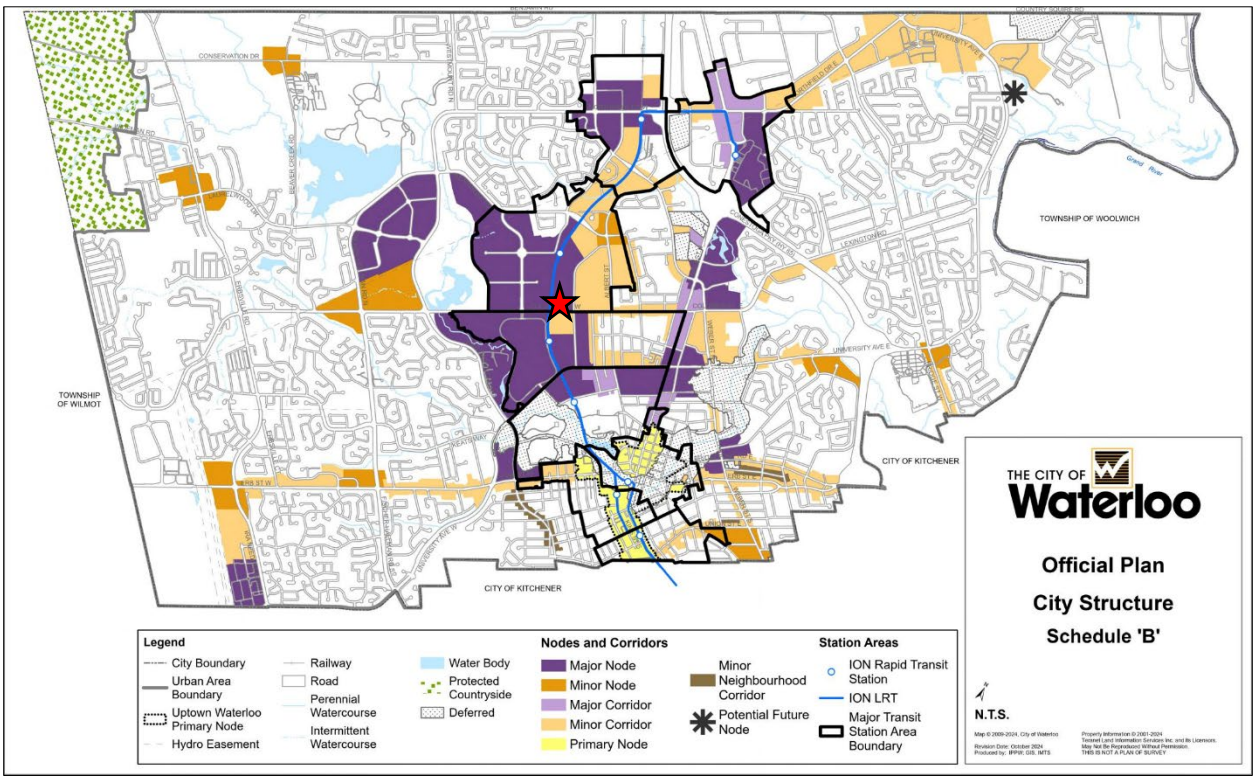


Figure 19: *Official Plan Amendment No.58, Adopted Schedule 'B' (City Structure)*

iii. Built Form – High Rise, 30 Storeys

The City is proposing to designate the subject lands to 'High Rise, 30 Storeys', as per Schedule 'A1' of OPA 58 (Figure 19). As per Section 3.4(2) of OPA 58, the maximum permitted height on the subject lands is 30 storeys within this designation, given the subject lands are located within an MTSA. Further, Section 3.4(3) of OPA 58 states that the minimum and/or maximum density may be established in the implementing Zoning By-law and that density provisions may be based on considerations that are unique to individual sites or areas. No maximum density is set out in OPA 58 for the subject lands.

The proposed development would exceed the maximum height requirement of 30 storeys, as a maximum height of 41 storeys is proposed. It is our opinion the proposed height increase to 41 storeys is appropriate given the site's location within an MTSA and along a significant transit corridor, where greater intensification is encouraged. The additional height supports the City's goals for compact, transit-oriented development and contributes to achieving density targets for residents and jobs. The design integrates height with a strong public realm, active frontages, and high-quality architecture to ensure compatibility and place-making within the surrounding context. Please refer to Section 7 of this Report for additional planning rationale.

Section 3.4(4) of OPA 58 states that residential density shall be measured using a gross density calculation after all road widenings and other land conveyances. All portions of the site that permit residential uses shall be used to calculate adherence to such gross density regulations. As such, after accounting for all road widening and land conveyances, the proposed would have a gross

density of 1,905 units per hectare. The density does not include the POPs area of 1,896 m^2 and new public right-of-way area of 1,276 m^2.

Section 3.4(6) of OPA 58 provides policy direction and criteria with respect to requests for increased heights. Given the applicant is proposing to exceed the maximum permitted height of 81 metres, such criteria would apply. As such, it is understood that any applicable land use designation, or any area-specific planning document, will be considered based on the following and any other consideration deemed appropriate by the City:

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

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

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

Section 3.4(8) of OPA 58 also provides policy direction for height requests that exceed the maximum requirements of the 'High-Rise' designation. More specifically, this Section states that applications that exceed the maximum height limit must demonstrate how the impact of the increased height will be minimized on adjacent low or medium rise areas. Such applications must demonstrate appropriate building massing and built form to mitigate shadow impacts, wind impacts, retain prominent views (including sky views), and complement the planned scale and densities of adjacent properties.

It is our opinion that the proposed development satisfies Section 3.4(6) of OPA 58 with respect to increased building height. The subject lands are located within a designated Major Transit Station Area and Major Node, where increased height and density are anticipated and encouraged to support transit-oriented development and intensification objectives. The proposed built form is appropriate for the site and surrounding context, particularly as the subject lands are not adjacent to any Low-Rise Residential or Mid-Rise Residential designations. All adjacent lands are located within the same MTSA boundary and are expected to experience similar levels of intensification. Furthermore, Columbia Street serves as a physical and visual buffer to the south, providing sufficient separation between the proposed towers and any potential land use conflicts. In particular, Tower 1 and Tower 3 are strategically positioned along the Columbia frontage to ensure appropriate spacing and to minimize potential impacts related to scale and massing to the University of Waterloo East Campus buildings.

Section 3.4(9) of OPA 58 states that as the height and/or scale of a development increases, the applicant shall demonstrate how the urban design, mitigation of impacts, and benefits to the surrounding community correspondingly increase.

As the proposed development introduces a building height that exceeds the permissions proposed by OPA 58 (41 Storeys versus the 30 Storey maximum), the proposal has been carefully designed to ensure that the urban design quality, mitigation of potential impacts, and public benefit are proportionately enhanced in line with the increased scale. The proposed towers have been designed with a strong emphasis on architectural quality, visual interest, and the creation of a pedestrian-friendly public realm. The building siting, massing, and articulation aim to minimize shadowing, overlook, and wind impacts, while maintaining generous tower separation and stepbacks to preserve sky views and light access. In particular, the proposal incorporates a 24.0-metre tower separation between the towers across the two (2) parcels, exceeding the minimum 22.0-metre zoning regulation, and locates towers to maximize openness between buildings. These separations not only respect privacy and minimize visual intrusion, but also reinforce a sense of spaciousness between high-rise forms despite the increased height.

In terms of community benefit, the development supports a range of objectives including an increased supply of housing within an MTSA, bicycle parking, high-quality urban design, and the delivery of a proposed POPS to be completed in Phase 2. The proposal also includes minimal surface parking, prioritizing underground parking to reduce the visual dominance of vehicles and reinforce pedestrian orientation. These features represent a clear commitment to delivering a well-rounded development that justifies the increased height and contributes meaningfully to the surrounding community.

Section 3.4(11) of OPA 58 states that new development shall seek to optimize, rather than maximize, height and density on any site. Optimization involves an appropriate and desirable balance between various city-building objectives, including the provision of housing, achieving built form and urban design objectives, a vibrant public realm, local economic development, preservation and enhancement of cultural heritage resources, site functions, provision of social and amenity spaces (including green spaces), land use compatibility, and community building. Development shall be required to comprehensively consider and support the totality of such objectives, to ensure that it constitutes good planning and aligns with the urban design and built form principles and objectives as outlined in this Plan.

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

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

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

Section 3.4(12) of OPA 58 states that any proposed tall building developments exceeding 410 metres above sea level shall demonstrate that the proposed development will not negatively impact the Region of Waterloo International Airport and public safety, as demonstrated either through an aeronautical assessment prepared by a qualified consultant, or a Land Use Assessment from NAV Canada, to the satisfaction of the Region of Waterloo. As part of the Zoning By-law Amendment Application, the applicant is requesting that a Holding Provision (H) be applied to the subject property in which no development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

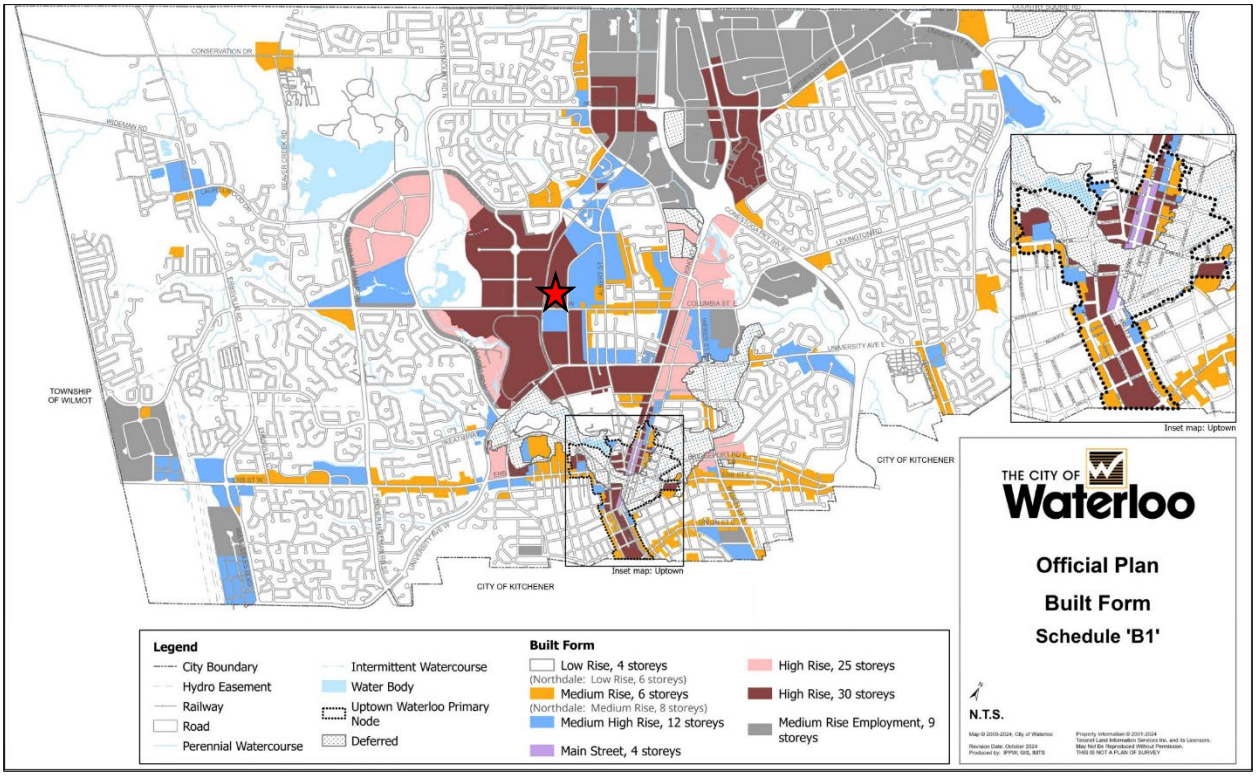


Figure 20: *Official Plan Amendment No.58, Adopted Schedule 'B1' (Built Form)*

iv. Major Transit Station Areas – Research and Technology Station

The subject lands are still identified as being within an MTSA, specifically the Research and Technology Station Area, in Schedule 'J3' of the Official Plan. It is understood that Schedule 'J3' remained unaltered as a result of OPA 58.

Section 3.5.3 (previously Section 3.8) of OPA 58 provides policy direction with respect to development within MTSAs. As per Section 3.5.3, these areas, shown on Schedule 'B' – City Structure of the Official Plan are a major focus for future growth and intensification. Higher population and employment densities and a mix of uses are planned within these areas to support

transit ridership, and contribute to the development of complete communities, with convenient access to a range of housing options, including affordable housing, jobs and local services / amenities.

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

The proposed density supports transit ridership by placing thousands of residents and potential transit users within close walking distance of the ION LRT and existing transit routes, thereby reinforcing the transit-supportive nature of the site. Furthermore, the development contributes to the formation of a complete community by integrating active transportation connections, public realm improvements, and access to amenities and services both within the development and in the surrounding area. Overall, the proposal exemplifies the type of intensification envisioned for MTSAs and helps advance the City's broader city-building and sustainability objectives.

It should be noted that the MTSA policies in the current in-force and effect Official Plan remain largely the same from the adopted OPA 58 text, with the exception of some clerical amendments and revised objectives. Although OPA 58 introduces clerical changes to MTSA policy wording, the overarching policy direction and intent remain unchanged. As such, the analysis provided in Section 6.e) of this Report continues to address and support the relevant MTSA policies as they exist today and as proposed under OPA 58. The proposed development remains consistent with the City's vision for MTSAs by delivering compact, transit-supportive intensification, public realm enhancements, and improved mobility connections. Should OPA 58 be approved by the Province, it is our opinion the analysis and conclusions in Section 6.e) would continue to apply and demonstrate conformity with the updated policy framework.

g) City of Waterloo Zoning By-Law

The subject lands are currently zoned ‘(Holding) Business Employment Two A Zone’ ((H)E2A-81), as per Schedule ‘A’ of the City of Waterloo Zoning By-Law 2018-050 (Figure 20). Based on our correspondence with City Staff, it is understood that the City of Waterloo has not prepared the implementing Draft Zoning By-law Amendment at this time to correspond with the ‘Station Area Mixed-Use’ land use designation proposed in adopted OPA No.58.

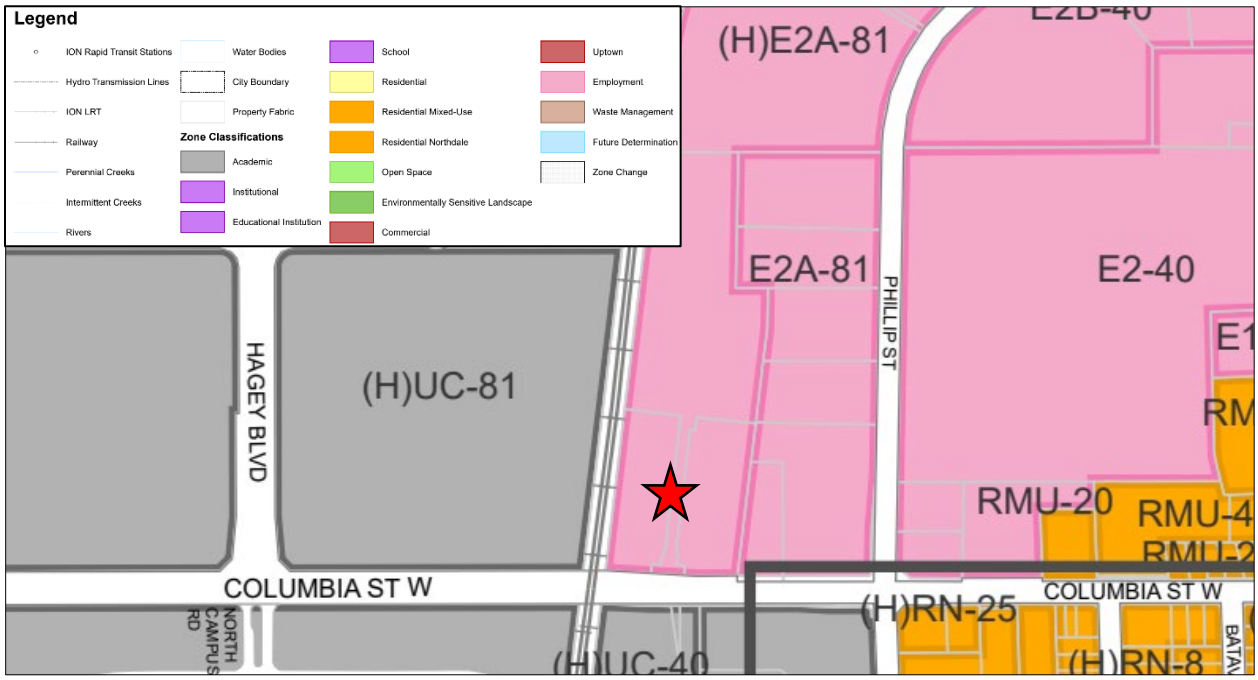


Figure 21: *City of Waterloo Zoning By-law – Schedule A*

i. Proposed Zoning

As per Section 95.1.1 of the Zoning By-law, the current (H)E2A-81 Zone does not permit the proposed mixed-use development no is it aligned with the new land use designations proposed by City-adopted OPA 58. As such, a Zoning By-law Amendment is required to permit the proposed development on the subject lands. It is also noted that the City's Zoning By-law has not yet been updated to reflect the policy direction of OPA 58, and the existing zoning is not aligned with the vision and objectives of the adopted 'Station Area Mixed-Use' designation, which seeks to accommodate intensification, mixed-use development, and transit-oriented growth.

Based on our review of the Zoning By-law and the direction provided by City Staff in the Pre-Consultation Record, the proposed Zoning By-law Amendment seeks to rezone the subject property from the current 'Holding Business Employment Two A Zone ((H)E2A-81)', to a 'Holding Site-Specific Residential Mixed Use – 81 Zone ((H)RMU-81)' to accommodate the site-specific requests. See Section 6.g.ii) of this Report below for details pertaining to the Holding Provision.

As per the following subsections, the applicant is proposing two (2) distinct RMU-81 Zones with Site-Specific Provisions for *each* property, being 170 Columbia St W and 180 Columbia St W. This is also summarized in Section 5 of this Report.

170 Columbia Street West (Phases 1 & 2)

The following table assesses the RMU-81 Zone Performance Standards outlined in Section 7.10.2 of the Zoning By-Law in relation to the proposed development (Phases 1 and 2) on the 170 Columbia St W site:

Regulation	RMU-81 Zone Requirement	Proposed RMU-81 Zone with Site-Specific Provisions
LOT FRONTAGE (minimum)	20 metres	50.0 metres
STREET LINE setback (minimum)	5 metres	11.2 metres
STREET LINE setback (maximum)	At least 75% of the STREET LINE FRONT BUILDING FAÇADE shall be within 6.0 metres of the STREET LINE	**0% within 6.0 metres of the Street Line***
SIDE YARD setback (minimum)	3 metres	4.0 metres
REAR YARD setback (minimum)	5 metres	8.7 metres
BUILDING HEIGHT (minimum)	13.5 metres	130.0 metres
BUILDING HEIGHT (maximum)	81 metres and 25 storeys	**130.0 metres and 41 storeys***
Density (minimum)	150 BEDROOMS per hectare	1,613 bedrooms per hectare (1,346 bedrooms total)
Density (maximum)	750 BEDROOMS per hectare	**1,613 bedrooms per hectare* (1,346 bedrooms total)**
LANDSCAPED OPEN SPACE (minimum)	30%	34% (includes POPS)
Number of main BUILDINGS per LOT (maximum)	More than one (1) permitted	2
Height of FIRST STOREY (minimum)	4 metres	7.0 metres
PODIUM Height (minimum)	10.5 metres	22.4 metres
PODIUM Height (maximum)	21 metres and 6 storeys	**22.4 metres and 7 storeys***
TOWER Separation measured from exterior face of the BUILDING, including balconies (minimum) (see 7.10.4)	a) 22 metres from a TOWER on the same LOT b) 11 metres from an INTERIOR LOT LINE	a) 68.3 metres b) **7.5 metres (West)*** **9.0 metres (East)***
Horizontal TOWER Dimension (maximum)	40 metres	30.7 metres
TOWER Footprint (maximum)	1,000 square metres	773.64 square metres

TOWER STEPBACK above PODIUM, including balconies, on the FRONT BUILDING FAÇADE and FLANKAGE BUILDING FAÇADE (minimum)	3 metres (see 3.T.5.1)	3.0 metres
AMENITY AREA (minimum)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT Bachelor Units (146 units): 146 x 3 = 438 m^2 1-Bedroom Units (398 units): 398 x 3 = 1,194 m^2 2-Bedroom Units (474 units): 474 x 5 = 2,370 m^2 TOTAL: 4,002 m^2	8,855.0 square metres
Elevator Penthouse Height (maximum)	6 metres	3.9 metres
Ancillary Uses specified in section 7.10.1.5 shall not collectively exceed fifteen percent (15%) of the BUILDING FLOOR AREA of the BUILDING in which the Ancillary Uses are located or 5,000 square metres, whichever is more restrictive.		621.0 square metres (1.97%)
For the Ancillary Uses specified in section 7.10.1.5, the maximum floor area of each commercial unit shall be 465 square metres.		99.0 square metres (maximum ancillary use unit size)
Residential Parking (minimum)	0 (MTSA)	230 spaces
Visitor Parking (minimum)	10% of the provided residential parking: 23 spaces	26 spaces
Non-Residential Parking (minimum)	0 (MTSA)	12 spaces
EV Parking (minimum)	3% of total required parking where 150 or more parking spaces are provided: 9 spaces	9 spaces

Accessible Parking (minimum)	Minimum Parking Spaces provided: 251-300 Type A: 4 spaces Type B: 4 spaces	Type A: 5 spaces Type B: 8 spaces
Bicycle Parking for Residential Uses (minimum)	Type A: 0.3 spaces per dwelling unit = 305 spaces Type B: 0.3 spaces per dwelling unit = 305 spaces	Type A: 647 spaces Type B: 0 spaces (Section 6.6.4 of the ZBL states that Type A spaces may satisfy Type B requirement)
Bicycle Parking for Non-Residential Uses (minimum)	a) BICYCLE PARKING spaces shall be provided at a minimum rate of forty percent (40%) of the required motor vehicle PARKING SPACES. This requirement may be satisfied as TYPE A BICYCLE PARKING and or TYPE B BICYCLE PARKING, except as specified in section 6.6.2.c.).i.).B.). b) where non-residential BUILDING FLOOR AREA exceeds 2,400 square metres, a minimum fifty percent (50%) of the required BICYCLE PARKING shall be provided as TYPE A BICYCLE PARKING.	a) N/A, as non-residential BUILDING FLOOR AREA does not exceed 2,400 square metres
Loading Spaces for Residential Uses (minimum)	2 Type A Spaces where 901 or more bedrooms are provided.	2 Type B Spaces
Loading Spaces for Non-Residential Uses (minimum)	1 Type B Space where the Building Floor Area is between 250 – 2,500 square metres.	2 Type B Spaces (621.0 square metres)

***Denotes required Site-Specific Provision.**

Based on the table above, the following Site-Specific Provisions would be required for the proposed RMU-81 Zone on the 170 Columbia St W site:

- Permit a Maximum Building Height of 130.0 metres and 41 Storeys, whereas the Zoning By-law requires a Maximum Building Height of 81 metres and 25 Storeys;
- Permit a Maximum Density of 1,613 bedrooms per hectare, whereas the Zoning By-law requires a Maximum Density of 750 bedrooms per hectare;
- Permit a Maximum Podium Height of 22.5 metres and 7 Storeys, whereas the Zoning By-law required a Maximum Podium Height of 21.0 metres and 6 Storeys;
- Permit a Minimum Tower Separation of 7.5 metres from the Interior Lot Line (West), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Minimum Tower Separation of 9.0 metres from the Interior Lot Line (East), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Maximum Street Line Setback of 11.2 metres where 0% of the Street Line Front Building Façade is within 6.0 metres of the Streetline, whereas the Zoning By-law requires 75%; and,

180 Columbia Street West (Phases 3 to 5)

The following table assesses the RMU-81 Zone Performance Standards outlined in Section 7.10.2 of the Zoning By-Law in relation to the proposed development (Phases 3, 4, and 5) on the 180 Columbia St W site:

Regulation	**RMU-81 Zone Requirement**	**Proposed RMU-81 Zone with Site-Specific Provisions**
LOT FRONTAGE (minimum)	20 metres	53.2 metres
STREET LINE setback (minimum)	5 metres	11.8 metres
STREET LINE setback (maximum)	At least 75% of the STREET LINE FRONT BUILDING FAÇADE shall be within 6.0 metres of the STREET LINE	**0% within 6.0 metres of the Street Line***
SIDE YARD setback (minimum)	3 metres	3.5 metres
REAR YARD setback (minimum)	5 metres	9.5 metres
BUILDING HEIGHT (minimum)	13.5 metres	130.0 metres
BUILDING HEIGHT (maximum)	81 metres and 25 storeys	**130.0 metres and 41 storeys***
Density (minimum)	150 BEDROOMS per hectare	2,436 bedrooms per hectare (1,860 bedrooms total)
Density (maximum)	750 BEDROOMS per hectare	**2,436 bedrooms per hectare* (1,860 bedrooms total)**

LANDSCAPED OPEN SPACE (minimum)	30%	**21% (1,563 square metres)***
Number of main BUILDINGS per LOT (maximum)	More than one (1) permitted	3
Height of FIRST STOREY (minimum)	4 metres	7.0 metres
PODIUM Height (minimum)	10.5 metres	22.4 metres
PODIUM Height (maximum)	21 metres and 6 storeys	**22.4 metres and 7 storeys***
TOWER Separation measured from exterior face of the BUILDING, including balconies (minimum) (see 7.10.4)	a) 22 metres from a TOWER on the same LOT b) 11 metres from an INTERIOR LOT LINE	a) 22.0 metres b) 12.0 metres (West) **6.7 metres (East)***
Horizontal TOWER Dimension (maximum)	40 metres	30.7 metres
TOWER Footprint (maximum)	1,000 square metres	773.64 square metres
TOWER STEPBACK above PODIUM, including balconies, on the FRONT BUILDING FAÇADE and FLANKAGE BUILDING FAÇADE (minimum)	3 metres (see 3.T.5.1)	3.0 metres
AMENITY AREA (minimum)	3 square metres for the first BEDROOM and 2 square metres for each additional BEDROOM in the DWELLING UNIT Bachelor Units (342 units): 342 x 3 = 1,026 m^2 1-Bedroom Units (296 units): 296 x 3 = 888 m^2 2-Bedroom Units (782 units): 782 x 5 = 3,910 m^2 TOTAL: 5,824 m^2	13,139.0 square metres

Elevator Penthouse Height (maximum)	6 metres	3.9 metres
Ancillary Uses specified in section 7.10.1.5 shall not collectively exceed fifteen percent (15%) of the BUILDING FLOOR AREA of the BUILDING in which the Ancillary Uses are located or 5,000 square metres, whichever is more restrictive.		911.0 square metres (3.1%)
For the Ancillary Uses specified in section 7.10.1.5, the maximum floor area of each commercial unit shall be 465 square metres.		127.0 square metres (maximum ancillary use unit size)
Residential Parking (minimum)	0 (MTSA)	274 spaces
Visitor Parking (minimum)	10% of the provided residential parking: 28 spaces	33 spaces
Non-Residential Parking (minimum)	0 (MTSA)	12 spaces
EV Parking (minimum)	3% of total required parking where 150 or more parking spaces are provided: 10 spaces	11 spaces
Accessible Parking (minimum)	Minimum Parking Spaces provided: 301-350 Type A: 4 spaces Type B: 5 spaces	Type A: 6 spaces Type B: 9 spaces
Bicycle Parking for Residential Uses (minimum)	Type A: 0.3 spaces per dwelling unit = 426 spaces Type B: 0.3 spaces per dwelling unit = 426 spaces	Type A: 958 spaces Type B: 0 spaces (Section 6.6.4 of the ZBL states that Type A spaces may satisfy Type B requirement)
Bicycle Parking for Non-Residential Uses (minimum)	a) BICYCLE PARKING spaces shall be provided at a minimum rate of forty percent (40%) of the required motor vehicle PARKING SPACES. This requirement may be satisfied as TYPE A BICYCLE PARKING and or TYPE B BICYCLE PARKING, except as	a) N/A, as non-residential BUILDING FLOOR AREA does not exceed 2,400 square metres

	specified in section 6.6.2.c.).i.).B.). b) where non-residential BUILDING FLOOR AREA exceeds 2,400 square metres, a minimum fifty percent (50%) of the required BICYCLE PARKING shall be provided as TYPE A BICYCLE PARKING.	
Loading Spaces for Residential Uses (minimum)	2 Type A Spaces where 901 or more bedrooms are provided.	3 Type B Spaces
Loading Spaces for Non-Residential Uses (minimum)	1 Type B Space where the Building Floor Area is between 250 – 2,500 square metres.	3 Type B Spaces (911.0 square metres)

***Denotes required Site-Specific Provision.**

Based on the table above, the following Site-Specific Provisions would be required for the proposed RMU-81 Zone on the 180 Columbia St W site:

- Permit a Maximum Building Height of 130.0 metres and 41 Storeys, whereas the Zoning By-law requires a Maximum Building Height of 81 metres and 25 Storeys;
- Permit a Maximum Density of 2,436 bedrooms per hectare, whereas the Zoning By-law requires a Maximum Density of 750 bedrooms per hectare;
- Permit a Maximum Podium Height of 22.5 metres and 7 Storeys, whereas the Zoning By-law requires a Maximum Podium Height of 21.0 metres and 6 Storeys;
- Permit a Minimum Landscaped Open Space of 21%, whereas the Zoning By-law requires a Minimum Landscaped Open Space of 30%;
- Permit a Minimum Tower Separation of 6.7 metres from the Interior Lot Line (East), whereas a Minimum Tower Separation of 11.0 metres from the Interior Lot Line is required;
- Permit a Maximum Street Line Setback of 11.8 metres where 0% of the Street Line Front Building Façade is within 6.0 metres of the Street line, whereas the Zoning By-law requires 75%; and,

ii. Holding Provision (H)

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

a) Sufficient buffer from railway operations to dissipate rail-oriented emissions, vibrations, and noise;
b) No adverse impacts to the sensitive uses; and

c) A sufficient safety barrier from railway operation and potential derailments, to the satisfaction of the City and any other authority having jurisdiction.

As summarized in Section 8 of this Report, a Transportation Noise and Vibration Assessment was prepared by Dillon Consulting Limited as part of the complete application submission. The rail vibration assessment found that measured vibration levels from LRT passbys were within acceptable limits established by the Federation of Canadian Municipalities and Railway Association of Canada, and no vibration mitigation measures are necessary. Therefore, based on the technical work completed in support of the proposed development, it is our opinion that the applications address the requirements of the current Holding Provision. Given that the development will be subject to future site plan approvals, it is recommended that this H be maintained so that this matter can be confirmed at the appropriate time when site details are confirmed.

Notwithstanding the above (and previously noted in this Report), the applicant is requesting that a Holding Provision (H) be applied to the subject lands (both 170 and 180 Columbia St W) for which the following applies:

- No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and,
- No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

7. LAND USE PLANNING RATIONALE

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

a) Alignment with Overarching Planning Framework

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

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

While the proposed Official Plan and Zoning By-law Amendments are required to accommodate aspects such as increased building height, density, and modified landscaped open space requirements, the overall form, function, and intent of the proposal are aligned with the City's vision for strategic growth areas. The development implements provincial and local growth management objectives by delivering high-quality residential intensification, ground-floor retail uses to support pedestrian activity, a proposed POPS to enhance the public realm, and a balanced transportation approach that emphasizes walkability, cycling, and transit use.

b) Efficient Use of Infrastructure and Municipal Services

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

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

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

c) Density

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

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

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

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

d) Height and Massing

The requested increase in maximum building height aligns with the City's intensification and urban structure objectives for Major Nodes and MTSAs, as articulated in Provincial policy and the direction of OPA 58. These areas are specifically intended to accommodate significant intensification, a vibrant mix of uses, and taller built forms to support higher-order transit infrastructure. The proposed height efficiently utilizes the subject lands, which are strategically

located along Columbia Street West within a walkable distance to the ION LRT corridor and multiple transit routes.

Further, although OPA 58 is not yet in full force and effect, it reflects the Council-adopted vision for growth in these areas. OPA 58 proposes to increase the maximum height permissions within the 'Station Area Mixed-Use' designation to 30 storeys, signaling a clear policy shift toward supporting taller buildings in strategic growth areas, particularly within MTSAs. The proposed 41 storeys align with this emerging direction by facilitating greater intensification in key locations identified for substantial growth under both local and provincial policy frameworks.

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

In support of the proposed building height of 41 storeys, it is important to consider recent development precedents within MTSAs across the Region of Waterloo. As the Region continues to evolve under a policy framework that emphasizes intensification, compact urban form, and transit-oriented development, a number of tall building approvals have been advanced within or near MTSAs. These precedents illustrate a growing acceptance of high-rise, mixed-use development in strategic locations that offer high connectivity, underutilized land, and access to higher-order transit. The examples below demonstrate how similar or greater building heights have been approved in a range of contexts within the Region, many in locations less centrally positioned or accessible than the subject site at 170 and 180 Columbia Street West.

The redevelopment of the former Kraus Carpet Factory lands at 525-565 Conestogo Road W, located within the Conestoga Station MTSA, consists of a maximum height of 35 storeys (Figure 21) . It is notable that this site is situated on the periphery of the MTSA boundary and further removed from the station platform than the subject lands at 170 and 180 Columbia Street West. Despite its peripheral location, the significant tower height is supported due to the site's scale, redevelopment potential, and access to transit. This sets a strong precedent for supporting comparable heights on sites like the subject lands that are not only within the MTSA boundary but are more centrally located and in closer proximity to two (2) ION stations, further strengthening the case for the proposed 41-storey towers.

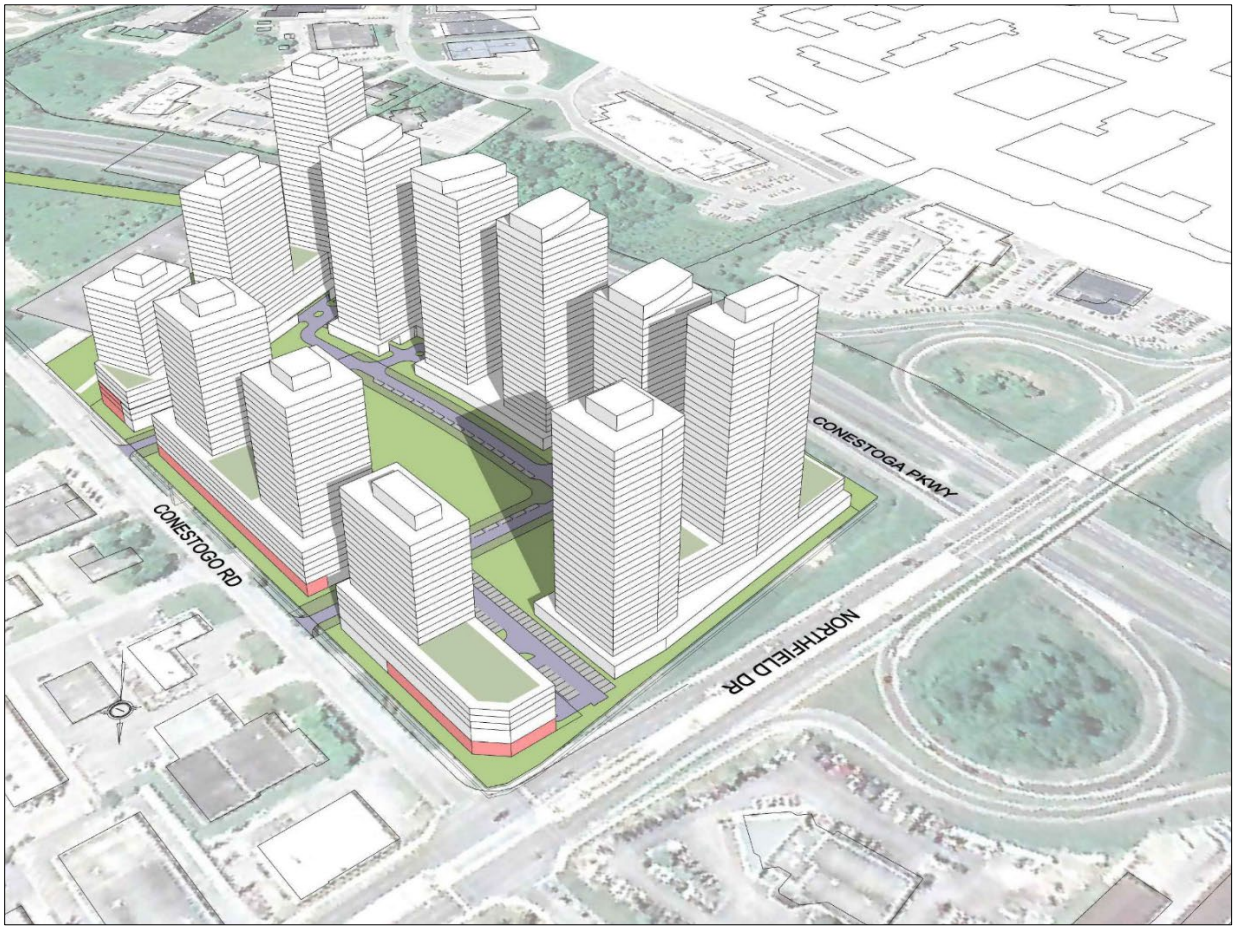


Figure 22: *525-565 Conestogo Road W, Waterloo – 3D Renderings (Source: Turner Fleischer)*

Located within the Central Station MTSA in Kitchener, 615 King Street W (Station Park Tower E) has been proposed at 50 storeys and is currently at the Site Plan Application stage (Figure 22). The tower is one of the tallest proposed within the Region and is being advanced within the context of a rapidly intensifying MTSA that is envisioned for substantial growth. The subject lands at Columbia Street West similarly benefit from exceptional transit access, adjacency to institutional and employment lands, and alignment with Provincial growth objectives, supporting the rationale for a tall building form of 41 storeys.



Figure 23: *615 King Street W, Kitchener – 3D Renderings (Source: KIRKOR Architects and Planners)*

The site at 200 Victoria Street South was approved for a 45-storey high-rise through an Official Plan Amendment and Zoning By-law Amendment, despite being located on the periphery of the Central Station MTSA (Figure 23). The City supported this increased height on the basis of its proximity to transit, redevelopment potential, and contribution to the MTSA density objectives. This precedent is particularly relevant to the subject site, as 170 and 180 Columbia Street West are on the periphery (south end of the Research and Technology MTSA), but are within short walking distance of both the University of Waterloo and Research and Technology ION stations. The support for taller buildings on the periphery of an MTSA further reinforces that 41 storeys is both appropriate and consistent with emerging patterns of intensification within Waterloo Region's strategic growth areas.



Figure 24: *200 Victoria Street S, Kitchener – 3D Renderings (Source: Arcadis)*

e) Podium Height

The minor increase in podium height is intended to better balance the scale of the tower elements with the pedestrian experience at street level. Podiums play a critical role in achieving appropriate street enclosure and reinforcing a human-scale environment within high-density contexts. It is our opinion that the proposed podium height of 22.5 metres (or 7 storeys) enables the provision of more active ground-floor uses and amenity spaces that enhance the public realm experience, especially along Columbia Street West. Furthermore, the visual impact of the increased podium height is mitigated by the greater setback from the street line, which allows for a more generous pedestrian zone, landscaping, and the integration of streetscape elements that collectively contribute to a comfortable and vibrant pedestrian environment.

This modest podium adjustment (an increase of 1.5 metres or 1-storey) will have no adverse impacts on the streetscape or surrounding context. Instead, it is our opinion that this increase contributes to an animated, walkable environment consistent with the City's objectives for streetscape design, active transportation, and complete communities. The design approach is further aligned with the Region and City's emphasis on creating transit-supportive environments that prioritize pedestrian comfort and activity.

f) Tower Separation from Interior Lot Lines

The proposed reductions to the minimum tower separation distances from the interior lot lines are considered appropriate and reflect a balanced, context-sensitive approach to site design that maintains livability, privacy, and access to light and sky views.

With respect to 170 Columbia Street West (Phases 1 and 2), it is our opinion that the 7.5-metre tower separation distance to the west is appropriate and represents good planning. The towers proposed on the adjacent lands at 180 Columbia Street West (Phases 3, 4, and 5) will maintain a 24.0 metre separation distance between buildings. This generous separation ensures that the reduced setback on the subject site does not compromise privacy, overlook, or access to daylight and sky views. In addition, the existing drive aisle that runs along the western boundary of 170 Columbia Street West, which is subject to a vehicular access easement, provides further functional separation between towers. This drive aisle is considered undevelopable and effectively acts as a buffer between the proposed towers, further mitigating potential impacts and reinforcing the appropriateness of the proposed tower placement.

To the east of the 170 Columbia St W site, the proposal notes a 9.0-metre public right-of-way along the eastern property boundary, as requested by City Staff. While the tower separation is proposed at 9.0 metres from the interior lot line, the future development on the adjacent property to the east will be set back an additional 9.0 metres from this right-of-way, resulting in an effective future tower separation of at least 18.0 metres, and potentially greater. It is our opinion that this spacing is sufficient to support comfortable distances between potential high-rise towers to the east, particularly in a dense, transit-oriented context.

With respect to the 180 Columbia St W (Phases 3 to 5) site, it is our opinion the proposed reduction in tower separation from the interior lot line on the east side is appropriate and represents good planning. Although 6.7 metres is proposed from the interior lot line to the east, a 24.0 metre tower separation will be maintained between the towers in Phases 3 to 5 (west side of the lot line) and Phases 1 and 2 (east side of the lot line), which exceeds the required 22.0 metre separation distance between towers. Further, between each site will be the existing 9.0 metres wide drive aisle. Both properties are being developed in a coordinated manner by the same proponent, therefore, the proposed design intentionally positions the towers with adequate spacing from each other, respecting overlook and privacy relationships while creating a cohesive, high-quality public realm.

It is also worth noting that the west side of the 180 Columbia Street West site directly abuts the ION LRT corridor. This corridor imposes an additional constraint, as no tower development could be within 25 metres of the buildings proposed in Phases 3 to 5. As such, the west edge of the property is effectively undevelopable for tower forms, reinforcing that all tower massing is appropriately internalized within the site and further justifying the eastern setback reduction.

Overall, the proposed tower separations have been carefully designed to respond to the site's development pattern and surrounding context. They maintain appropriate tower spacing in line with urban design best practices and will ensure adequate access to sunlight, privacy, and visual separation for current and future residents. Moreover, the proposed separations reflect the evolving built form policies of OPA 58 and broader intensification goals for MTSAs, where compact urban form and efficient land use are encouraged.

g) Street line Setback

The requested increase in the maximum street line setback for both sites and corresponding reduction in the percentage of building frontage within 6.0 metres of the street line is warranted due to the unique site geometry and right-of-way configuration along Columbia Street West. The existing vehicular access easement and widened public right-of-way at the corners of each site significantly reduces the functional depth of the front yard, pushing the street line further into the site. The proposed 11.2 metre (170 Columbia St W) and 11.8 metre (180 Columbia St W) setbacks ensure that the buildings align with the established built form between Phases 1 and 3 fronting Columbia St W, thereby creating a consistent and cohesive streetscape. Further, the proposed setbacks generally align with the existing buildings to the east of 170 Columbia St W, helping to maintain a consistent and coherent street wall condition along the corridor.

While the required 75% façade condition within 6.0 metres of the street line cannot be met, the design maintains strong pedestrian interface, high-quality landscaping, and active ground-floor uses that collectively support a vibrant and engaging public realm. The proposed variation maintains the intent of the zoning standard while responding to site-specific constraints and promoting contextual compatibility.

h) Landscaped Open Space

The request for a reduced landscaped open space provision applies specifically to 180 Columbia St W (Phases 3, 4, and 5) of the overall development. While the standalone percentage on this site is 9% lower than the minimum requirement, it is our opinion that it must be understood within the broader context of the overall master-planned development of the lands at 170 and 180 Columbia Street West.

A significant high-quality open space amenity, being the proposed POPS, is proposed within Phase 2 of the development. This POPS, approximately 1,896 square metres in size, will serve the residents of all phases and the broader public, providing meaningful green space, social gathering opportunities, and enhancing overall community livability. If the POPS is successfully delivered, it is intended to be conveyed to the City as part of the required parkland dedication. Alternatively, if it cannot be provided, the applicant will provide cash-in-lieu to satisfy parkland dedication obligations.

The overall design approach effectively distributes open spaces and amenities across the entire development site, ensuring a high quality of living environment while promoting accessibility and interaction. Therefore, despite the proposed reduction for Phases 3-5 individually, when viewed comprehensively, the intent and spirit of the landscaped open space requirements are achieved and maintained in keeping with both OPA 58 and the general urban design principles set out in the City's Official Plan.

8. SUPPORTING STUDIES

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

Supporting Study	Name of Party	Date Completed
Urban Design Brief	Up Consulting Ltd.	May 2, 2025
Functional Servicing & Stormwater Management Report	WalterFedy	April 18, 2025
Transportation Impact Study	GHD	April 23, 2025
Pedestrian Level Wind Study	The Boundary Layer Wind Tunnel Laboratory - The University of Western Ontario	April 22, 2025
Geotechnical Investigation	Chung & Vander Doelen Engineering Ltd.	February 5, 2025
Transportation Noise and Vibration Assessment	Dillon Consulting Limited	April 2025
Land Use Compatibility Assessment	Dillon Consulting Limited	April 2025
Shadow Study Analysis	Up Consulting Ltd.	May 2, 2025
Energy Strategy Report	S+A Footprint	April 29, 2025

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

a) Urban Design Brief

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

b) Functional Servicing & Stormwater Management Report

A Functional Servicing and Stormwater Management Report (FSR) was prepared by WalterFedy, dated April 18, 2025, as part of the complete application submission. The purpose of Report is to identify how the development will be serviced, including water, sanitary, and storm connections to

existing municipal infrastructure. A preliminary stormwater management design was also included, demonstrating adherence to the City of Waterloo and Region of Waterloo design criteria.

Based on the findings and analysis of the Report, servicing will be provided such that both 170 and 180 Columbia Street West can be serviced independently to municipal infrastructure. The existing use of private sanitary, storm and water infrastructure will be abandoned.

Sanitary flow will connect to the Columbia Street West sewer. City confirmation is needed to ensure capacity for the additional 48.20 L/s of flow. Existing downstream constraints are under review in the City's updated Sanitary Sewer Master Plan.

The 300 mm watermain on Columbia St W is expected to meet domestic and fire flow needs. Towers over 84 m will need redundant connections per OBC. Existing and proposed hydrants will provide adequate fire coverage.

Post-development storm flows will match pre-development levels for major storm events via underground cisterns and controlled roof drains. Existing infrastructure is adequate for storm servicing.

Oil/grit separators and/or other low impact development measures will manage runoff from private roads, with details to follow in later stages of the approvals process.

Silt fencing, fabric covers, and mud mats will be used during construction, with full details in the detailed design phase.

Salt use will be addressed in both the design and ongoing operations of the development.

c) Transportation Impact Study

A Transportation Impact Study (TIS) was prepared by GHD, dated April 23, 2025, as part of the complete application submission. The purpose of the TIS was to evaluate the anticipated traffic impacts on the surrounding road network and determine appropriate site access and internal circulation. The study confirmed that "Access 1" (i.e. the existing access along Columbia St W) will remain as a full-movement intersection with side street stop control, and a new pedestrian signal will be implemented at Laurel Trail, replacing the existing signal at Access 1. Traffic counts were taken in late 2023 and 2024, and additional background developments were considered in forecasting future traffic volumes.

Trip generation analysis projected moderate increases in traffic, as the proposed development is expected to generate a total of 51 inbound and 162 outbound automobile trips during AM peak hour, and 156 inbound and 101 outbound automobile trips during PM peak hour. These trips can be accommodated within the existing and proposed street infrastructure, especially with the planned signalization of "Access 2" along Columbia St W (bordering the eastern boundary of the subject property) and the new pedestrian crossing at the Laurel Trail / Columbia Street West. No further road improvements are necessary. The TIS also found that the proposed access points will function well under 2032 traffic conditions.

TIS notes that the shortfall is justified due to anticipated low vehicle ownership among residents—many of whom are expected to occupy bachelor and one-bedroom units—and strong access to transit, cycling, and pedestrian networks. The retail component is primarily intended to serve on-site residents and visitors. Additionally, vehicle circulation within the site is adequate for service and emergency vehicles. Transit impacts are expected to be minimal, and the development will not significantly affect pedestrian or cyclist infrastructure. Overall, the TIS concludes that the proposed redevelopment can be supported by the existing and planned transportation infrastructure.

d) Pedestrian Level Wind Study

A Pedestrian Level Wind Study was prepared by The Boundary Layer Wind Tunnel Laboratory - The University of Western Ontario, dated April 22, 2025, as part of the complete application submission. The purpose of the Pedestrian Level Wind Study was to evaluate wind conditions for pedestrian safety and comfort around and within the proposed five-tower, high-rise mixed-use project. The Study was conducted using scaled models in a wind tunnel and followed the City of Waterloo's Terms of Reference for wind studies. Two (2) site configurations were assessed: the existing condition (low-rise office buildings and parking lots) and the proposed development (towers ranging from 37 to 42 storeys). Wind measurements were taken at 144 locations under the proposed configuration, including ground-level and upper-level amenity areas.

Findings indicated that the existing site meets all pedestrian safety and comfort criteria, with most areas suitable for standing or better year-round. However, the introduction of tall towers in a previously low-rise suburban context results in localized increases in wind speeds. Under the proposed configuration, all off-site areas met safety criteria, but several on-site locations, including near entrances and within amenity terraces, exceeded comfort or safety thresholds, particularly in winter months. These areas include ground-level Locations 15, 23, and 39, as well as Amenity Location 137, which exceeded safety limits and require mitigation. Additionally, several entry points and amenity spaces were found to be uncomfortable or marginally suited for walking, highlighting the need for targeted improvements.

To address these wind speeds, the Study recommends a series of mitigation measures to improve pedestrian comfort and safety. These include installing porous wind screens along the site's perimeter, adding canopies and recessed entryways, incorporating densely planted evergreen landscaping, and adjusting terrace railing heights or adding localized windbreaks. The proposed landscape plan already integrates many of these elements, such as fences, wind barriers, and strategic vegetation placement. The effectiveness of these measures will need to be verified through future wind tunnel testing, notably at the detailed Site Plan Application Stage. Overall, the Study concludes that with appropriate mitigation, the development can achieve suitable pedestrian wind conditions for its intended uses.

e) Geotechnical Investigation

A Geotechnical Investigation was prepared by Chung & Vander Doelen Engineering Ltd., dated February 5, 2025, as part of the complete application submission. The investigation was

undertaken to characterize the subsurface soil and groundwater conditions and to provide foundation design recommendations. It included borehole drilling, laboratory testing, in-situ pressure meter testing, and groundwater monitoring to inform key design and construction parameters.

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

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

f) Transportation Noise and Vibration Assessment

A Transportation Noise and Vibration Assessment was prepared by Dillon Consulting Limited in April 2025, as part of the complete application submission. The purpose of the Assessment was to evaluate the impact of nearby road and rail traffic on the site and determine the need for mitigation measures. This Assessment was completed in accordance with the Region of Waterloo and Ontario Ministry of the Environment, Conservation and Parks (MECP) guidelines. It assessed noise from road traffic on Columbia Street West and Phillip Street, as well as the LRT and freight train activity along the adjacent Waterloo Central Railway Guelph Spur Line. It also included a rail vibration analysis to assess potential impacts from the LRT.

The findings indicated that predicted transportation noise levels at many building facades and outdoor living areas (OLAs) exceeded MECP noise criteria, requiring mitigation. Key measures include the use of brick veneer or acoustical equivalent construction and upgraded glazing systems for facades of Phases 3, 4, and 5, especially those facing north, south, and west. Air conditioning systems with associated warning clauses are required for certain building exposures, with Type D clauses for the most impacted facades and Type C for others. Outdoor terrace areas on the podiums also exceeded acceptable noise thresholds and require 1.5-metre acoustic barriers to reduce sound levels to within guidelines. All mitigation measures are to be verified and refined at the Site Plan Approval stage.

The rail vibration assessment found that measured vibration levels from LRT pass bys were within acceptable limits established by the Federation of Canadian Municipalities and Railway Association of Canada, and no vibration mitigation measures are necessary. The Assessment

concludes that with the recommended noise controls and clauses in place, the development can achieve compliance with applicable standards for both noise and vibration.

g) Land Use Compatibility Assessment

A Land Use Compatibility Assessment was prepared by Dillon Consulting Limited in April 2025, as part of the complete application submission. The Assessment was conducted to evaluate potential land use conflicts between the proposed high-density residential use and existing industrial or employment uses in the surrounding area. This study was requested by the Region of Waterloo and completed in accordance with the Ministry of the Environment, Conservation and Parks (MECP) D-Series Guidelines, NPC-300 Noise Guidelines, and local air quality regulations. The primary objective was to assess the potential for adverse effects related to stationary noise, odour, air quality, dust, and vibration from nearby facilities on the proposed sensitive residential land use.

The Assessment identified several surrounding industrial and commercial operations, including Napa AutoPro, Columbia Data Vault/Ford RnD Centre, Prica Orchard Inc., University of Waterloo offices, and Valley Blades Limited. Most nearby facilities were classified as Class I industries, with Valley Blades identified as Class II due to its manufacturing and outdoor storage activities. Stationary noise modelling predicted that most residential façades and amenity areas of the proposed development would comply with MECP NPC-300 criteria under both Class 1 and Class 4 area classifications. However, a limited number of façades and terraces, particularly those closest to the Napa AutoPro and Columbia Data Vault sites, exceeded noise thresholds and will require mitigation. Emergency generator testing at Columbia Data Vault also produced exceedances at a few locations.

The assessment concluded that the proposed development is generally compatible with surrounding land uses, provided that mitigation measures are implemented. These include noise control features such as upgraded building façades, acoustic barriers for amenity areas, and consideration of mechanical system placement to minimize impacts. It also recommended that warning clauses be included in tenant and purchaser agreements to acknowledge the proximity to employment uses. No significant concerns related to odour, dust, or vibration were identified. With these measures in place, the proposed development is expected to meet MECP and Regional compatibility requirements.

h) Shadow Study Analysis

A Shadow Study Analysis was prepared by Up Consulting Ltd., in conjunction with the Shadow Diagrams prepared by AAA Architects Inc. as part of the complete application submission. The purpose of the analysis was to assess the shadowing impacts of the proposed development on adjacent lands and uses. Based on the study, it was determined that the proposed development will meet the requirements outlined in the City of Waterloo’s Sun/Shadow Analysis Terms of Reference.

i) Energy Strategy

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

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

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

9. PUBLIC CONSULTATION STRATEGY

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

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

The proposed public consultation process is as follows:

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

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

10. CONCLUSION AND RECOMMENDATIONS

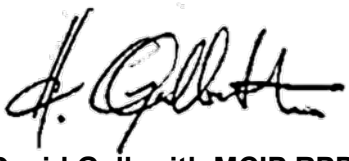
This Report provides an assessment of the proposed development and development applications for the properties known municipally as 170 & 180 Columbia Street West, which includes a discussion on the existing conditions of the site, its context, the land use planning policy framework applicable to it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

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

Moreover, it is our opinion that the development provides for context appropriate intensification, supports the orderly redevelopment of the site, and supports the wise use of existing infrastructure. It is our opinion that this application serves the public interest and represents sound land use planning. Based on the above and the conclusions of this Report, it is our recommendation that the City of Waterloo:

- Deem the Official Plan and Zoning By-law Amendment application complete and process the application in accordance with the municipal process;
- Schedule a Neighbourhood Information Meeting to obtain comments from neighbouring residents and interested parties; and,
- Circulate the application to internal departments, technical review agencies, and the community in accordance with city procedures and the Planning Act.

Respectfully submitted,





David Galbraith MCIP RPP
President, UP Consulting

Christian Tsimenidis BES
Senior Planner, UP Consulting