



August 11, 2025

Natalie Hardacre, Manager of Development Planning
 Planning Division
 City of Waterloo
 100 Regina Street South
 PO Box 337, Station Waterloo
 Waterloo, ON, N2J 4A8

Dear Ms. Hardacre,

**RE: Formal Application Submission – Zoning By-law Amendment
 167-171 King Street South, City of Waterloo
 OUR FILE 15202B**

On behalf of our client, VanMar Developments 171 King GP Corp, we are pleased to submit the enclosed application for a Zoning By-law Amendment for the lands municipally addressed as 167-171 King Street South (herein referred to as the “subject lands”). The subject lands have an area of 0.53 hectares and currently contain the existing Erb & Good Funeral Home (which will be relocated to a different property). The subject lands are bounded by King Street South to the east, and Caroline Street to the west, and lie adjacent to Chartwell Terrace on the Square retirement home and Brewmeister Green Park to the north, and the Circa1877 high-rise mixed-use development to the south. The existing building on the subject lands consists of multiple additions that have been added over time to the original Kuntz Labatt House, a building which has been designated under Part IV of the Ontario Heritage Act and included in the City of Waterloo’s Municipal Heritage Register.

The proposed development consists of a multi-tower mixed use development with a 37-storey tower fronting Caroline Street and a 33-storey tower fronting King Street on a shared 5-storey podium. The proposed development is separated into two phases with Phase 1 containing the 37-storey Tower A and Phase 2 containing the 33-storey Tower B. The proposed development includes shared indoor and outdoor amenity space including a rooftop amenity area above the podium, and indoor amenity areas on the 6th floor of the towers that would connect with the common outdoor amenity area. Between both phases, a total of 834 units are proposed in a mix of one- and two-bedroom units, with a total of 403 spaces (to be shared between residential, commercial and visitors).

The significant components of the existing Kuntz Labatt House are proposed to be retained and incorporated into the development. The heritage resource is proposed to be relocated closer to King Street to become part of the active frontage of the new development, as shown on the concept plan. A detailed Heritage Impact Assessment has been developed to evaluate this approach.

The site design provides a full vehicular access off Caroline Street, as well as a secondary access from Kuntz Lane to provide a more convenient access to the restaurant and good vehicular circulation within the site.

The subject lands are designated 'Uptown Mixed Use' and 'High Density' in Schedules A1 and B1, respectively, of the City of Waterloo Official Plan. These designations permit the proposed mixed-use development with a maximum building height of 81 metres and a maximum density of 750 bedrooms per hectare. OPA 58 (awaiting final Ministry approval) removes the maximum density permission. Council recently supported an Area Specific Policy (ASP) for the subject lands which provides for additional height to a maximum of 38 storeys. The proposed application complies with the ASP, which is intended to be approved by the Ministry as part of OPA 58. An Official Plan Amendment is not included in this submission given the imminent approval of OPA 58 and the site-specific policy.

City of Waterloo Zoning By-law No. 2018-050 zones the subject lands as Uptown Mixed-Use (U2-81), which permits the proposed mixed-use development, but similar to the current designation, limits the development to 81 metres in height and a maximum density of 750 bedrooms per hectare. A Zoning By-law Amendment is required primarily to increase the maximum permitted height and density. The proposed Zoning Amendment includes other special provisions required in support of the proposed development. It is noted that the proposal fully complies with the City's tower related regulations. A detailed summary of the requested zoning relief is outlined in the attached Planning Justification Report.

In addition to the information provided as part of the online application, we are pleased to provide a copy of the following submission requirements outlined in the pre-consultation comments:

- Completed Application Form (online)
- Draft Zoning By-law Amendment Exception (appended to Planning Justification Report)
- Permission to Enter Form
- Owner Authorization Form
- Section 59 Notice of Source Protection Plan Compliance
- Planning Justification Report
- Urban Design Brief
- Architectural Package including:
 - Site Plan
 - Site Statistics
 - Building Elevation Drawings and Renderings
 - Shadow Study
- Pedestrian Wind Tunnel Study
- Energy Strategy Study
- Heritage Impact Assessment
- Preliminary and Functional Grading Plan
- Functional Servicing and SWM Report
- Noise Impact Study
- Transportation Impact Study and Truck Turning Plan
- Construction Spill and Response Plan
- Preliminary Scoped Hydrogeological and SWP Potential Contamination Study

We note that the City's online application system does not support reports greater than 10MB in size. As such, in addition to the online submission a one drive link has been provided with access to all reports.

It is noted that the owner has been engaged in discussions with Indigenous groups for the last several months and is in the process of finalizing agreements with various groups prior to submission of the Archaeological Study to the Ministry (as is the preferred process by the indigenous communities). It is anticipated that the Ministry Acknowledgment will be available prior to a Council decision on the zoning application.

The following required City submission fees will be provided under separate cover:

- Application Fees: Zoning By-law Amendment – \$29,635.00
- Zoning Sign Fee Deposit – \$395.00
- Zoning Sign Fee – \$222.42
- Public Notice Advertisement Fee - \$2,547.00
- City of Waterloo Peer Review Fee (Noise Study) - \$6,497.50

The Region's application fee will be provided directly to the Region. All materials have been submitted electronically.

Your attention to this matter is appreciated. If there are any questions, or you would like to further discuss the proposed application, please do not hesitate to contact the undersigned. We look forward to working with the City of Waterloo on this application.

Yours truly,

MHBC



Andrea Sinclair, MUDS, MCIP, RPP
Partner



Luisa Vacondio, BES, MCIP, RPP
Senior Planner

*cc. Paul Leveck
Catheryne McCutcheon*