

February 10, 2025

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

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

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

- One (1) copy of the Post-Circulation Comments provided by the City of Waterloo;
- One (1) copy of the *revised* Planning Justification Report prepared by Up Consulting Ltd.;
- One (1) copy of the *revised* Architectural Package prepared by AAA Architects Inc.;
- One (1) copy of the *revised* Landscape Plan prepared by Ferris & Associates Inc.;
- One (1) copy of the *revised* Functional Servicing & Stormwater Management Report prepared by WalterFedy;
- One (1) copy of the *revised* Transportation Impact Study prepared by GHD;
- One (1) copy of the *revised* Transportation Noise and Vibration Assessment prepared by Dillon Consulting Limited; and
- One (1) copy of the *revised* Land Use Compatibility Assessment prepared by Dillon Consulting Limited.

City Staff provided the final Post-Circulation Comments package on October 30, 2025, outlining initial comments, as well as details to be addressed in order to advance both applications. Following receipt of the comment package, several meetings and ongoing correspondence with City Staff were undertaken to obtain further clarification and direction on the items identified. A

Comment Matrix, found in **Appendix A** of this Letter, has been prepared to address the comments from the Post-Circulation Comments.

1) Summary of Revised Development Proposal

As described in the revised Planning Justification Report prepared by Up Consulting Ltd., the applicant is proposing a multi-phase mixed-use development that will be executed over five (5) phases and two (2) properties (170 and 180 Columbia Street West). The 170 Columbia St W lands consist of Phases 1 and 2, while the 180 Columbia St W lands consist of Phase 3, 4 and 5.

The proposed development will consist of five (5) high-rise, mixed-use towers ranging from 25 to 35 storeys (reduced from the previous 37 to 41 storeys in the original submission). Ground floor retail and office units are provided, as well as rooftop indoor and outdoor amenity space for each building. The proposed development comprises a total of 1,968 dwelling units and 2,993 bedrooms across the five (5) phases.

A total of 1,248 m² of retail and office space is proposed across the development. More specifically, Phase 1 consists of 302 m² of retail space, Phase 2 consists of 266 m² of office space, Phase 3 has 288 m² of retail space, Phase 4 has 264 m² of retail/office convertible space, and Phase 5 has 128 m² of office space. The intent of this approach is to maintain the retail units closer to the Columbia St W frontage for public-private street activation and marketability, while the office units are located closer to the rear of the subject lands.

As part of the revised development concept, the Phase 1 tower has been shifted north of a consolidated Common Outdoor Amenity Area, which now directly fronts Columbia St W. in response to comments received from City Planning and Urban Design Staff. This design refinement results in a clearer and more functional site layout, while strengthening the pedestrian interface along the public street. Through further review of site constraints and implementation considerations, the previously contemplated Privately Owned Publicly Accessible Space (POPS) has been replaced with a Common Outdoor Amenity Area intended exclusively for residents. The POPS approach was reconsidered due to the presence of servicing infrastructure and utilities within the subsurface area of this portion of the site, which would limit the City's ability to accept the lands as unencumbered public space. As the City's parkland dedication framework requires conveyed parkland to be free of encumbrances, the provision of a POPS in this location was determined to be impractical. Accordingly, parkland dedication associated with the development will be satisfied through cash-in-lieu, in accordance with the City's policies. Notwithstanding, the owner intends to provide for public use/access of this area akin to that of a park.

The revised development proposal provides a total of 425 parking spaces across all five (5) phases, primarily accommodated within two (2) levels of underground parking. Limited surface parking is proposed on both properties, consisting of 13 spaces on the 170 Columbia St W lands (6 for Phase 1, 7 for Phase 2) and 15 spaces on the 180 Columbia St W lands (6 for Phase 3, 3 for Phase 4, and 6 for Phase 5), which are intended to serve accessible and visitor parking needs.

As part of the final build-out, no underground parking is proposed for Phase 1. The initial phase of the master-planned development will provide six (6) accessible parking stalls at-grade that will be maintained in perpetuity. A temporary surface parking area is proposed at the rear of the 170 Columbia Street West site, providing 106 parking stalls to support occupancy of Phase 1. These temporary stalls are anticipated to be removed in the future when Phase 2 of the development is initiated, and the lands are required for construction.

Residential bicycle parking is also provided, with a total of 1,220 bicycle spaces across the development. An additional 14 bicycle parking spaces are provided to support the non-residential uses, distributed across the phases in accordance with the scale and function of each component.

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

2) Amended Development Applications

Since the original submission in May 2025, the Province approved Official Plan Amendment No. 58 (OPA 58) on December 17, 2025, which is identified as Phase 1 of the City of Waterloo's ongoing Official Plan Review. As a result, the policies and mapping introduced through OPA 58 are now in full force and effect. The subject lands would therefore be designated as "Station Area Mixed-Use", reflecting their location within a Major Transit Station Area.

In response to the approval of OPA 58, and informed by refinements to the proposed development since the original submission, the following section of this letter outlines the revised Official Plan and Zoning By-law Amendment requests, which have been updated to align with the new policy context and the revised built form and site design.

As detailed further below, the Official Plan Amendment proposes to redesignate both sites from 'Employment' to 'Station Area Mixed-Use' to facilitate the proposed development, along with a Specific Provision Area to increase maximum height and seek relief from Policy 10.5(12) pertaining to the minimum non-residential floor area requirement for commercial, employment, and/or community use. A subsequent Zoning By-law Amendment Application, as detailed further below, is required to permit mixed-use development and establish Site-Specific Provisions pertaining to setbacks, non-residential floor area, density, podium and tower heights, tower separation, rooftop amenity space, and railway separation.

These Site-Specific Policy and/or Provisions Areas associated with the Official Plan and Zoning By-law Amendments are intended to apply to each of the two (2) subject properties as a whole (being 170 Columbia St W and 180 Columbia St W), rather than being tied to individual phase boundaries. This approach recognizes that the proposal represents a coordinated, master-planned development across two (2) distinct parcels that will be implemented over time, while ensuring that the applicable policy and zoning framework is clear, consistent, and comprehensive for each lot. Applying site-specific permissions at the lot level provides flexibility for the orderly phasing and sequencing of development, while maintaining appropriate controls on built form, height, density, and site design throughout the build-out of the project. It is our understanding that

this approach, as opposed to reliance on internal phasing lines, has been accepted by the City of Waterloo in previous multi-phase development applications and represents a practical regulatory framework for long-term implementation.

170 Columbia St W (Phases 1 and 2)

Official Plan Amendment

As part of the original OPA application for the subject lands, part of the purpose of the OPA was to redesignate the lands 'Station Area Mixed Use' and to remove the lands from an employment lands designation. As indicated above, as a result of OPA 58, the lands are now designed 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally-proposed OPA are no longer required.

In order to reflect the updated development concept now proposed and to reflect the heights now contemplated, the applicant is proposing a revised OPA to:

- Amend Schedule 'A6' (Specific Provision Areas) – to establish a 'Specific Provision Area ___' to reflect the following provision:
 - Notwithstanding Schedule 'B1' – Height and Density and the policies of this Plan, the maximum building height for Phase 1 shall be 112.5 metres or 35 storeys, while the maximum building height for Phase 2 shall be 97.5 metres or 30 storeys.

Zoning By-law Amendment

Rezone the subject property from '(Holding) Business Employment Two A ((H)E2A81)' Zone to '(Holding) Station Area Mixed Use ((H)SAMU-105)' Zone with the following Site-Specific Provisions:

- Permit a Minimum Side Yard Setback of 1.1 metres, whereas the Zoning By-law requires 3.0 metres;
- Permit a Minimum Building Floor Area for Non-Residential Uses of 0.6 square metres per dwelling unit, whereas the Zoning By-law requires 1.0 square metres per dwelling unit;
- Permit a Maximum Density of 1,460 bedrooms per hectare, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.5 metres or 35 storeys for Phase 1, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Maximum Podium Height of 7 storeys, whereas the Zoning By-law requires a maximum of 6 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (West) of 7.4 metres, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Maximum 26% of the required Amenity Space as Outdoor Rooftop Amenity Space located more than 22 metres above grade, whereas the Zoning By-law requires a maximum of 20%; and,

- That a Holding Provision (H) be applied to the subject property for which the following applies:
 - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and,
 - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

180 Columbia St W (Phase 3 to 5)

Official Plan Amendment

As mentioned above, part of the purpose of the original OPA submission was to redesignate the lands 'Station Area Mixed Use' and to remove the lands from an employment lands designation. As indicated above, as a result of OPA 58, the lands are now designed 'Station Area Mixed-Use' and located within a 'Major Node'. Accordingly, these elements of the originally-proposed OPA are no longer required.

In order to reflect the updated development concept now proposed and to reflect the heights now contemplated, the applicant is proposing a revised OPA to:

- Amend Schedule 'A6' (Specific Provision Areas) – to establish a 'Specific Provision Area ___' to reflect the following provision:
 - Notwithstanding Schedule 'B1' – Height and Density and the policies of this Plan, the maximum building height for Phase 3 shall be 112.5 metres or 35 storeys, the maximum building height for Phase 4 shall be 82.0 metres or 25 storeys, and the maximum building height for Phase 5 shall be 97.5 metres or 30 storeys.
 - Notwithstanding Policy 10.5(12) of this Plan, the minimum floor area for non-residential uses across Phases 3, 4 and 5 shall be 0.50 m² per dwelling unit.

Zoning By-law Amendment

Rezone the subject property from '(Holding) Business Employment Two A ((H)E2A81)' Zone to '(Holding) Station Area Mixed Use ((H)SAMU-105)' Zone with the following Site-Specific Provisions:

- Permit a Minimum Street Line Setback of 0.8 metres, whereas the Zoning By-law requires 4.0 metres;
- Permit a Maximum Street Line Setback of 76% of the Street Line Building Façade within 6.0 metres of the Street Line, whereas the Zoning By-law requires 75%;
- Permit a Minimum Side Yard Setback of 1.2 metres, whereas the Zoning By-law requires 3.0 metres;

- Permit a Minimum Building Floor Area for Non-Residential Uses of 0.5 square metres per dwelling unit, whereas the Zoning By-law requires 2.0 square metres per dwelling unit.
- Permit a Maximum Density of 2,327 bedrooms per hectare, whereas the Zoning By-law requires a maximum of 900 bedrooms per hectare;
- Permit a Maximum Building Height of 112.5 metres or 35 storeys for Phase 3, whereas the Zoning By-law requires a maximum of 105 metres or 30 storeys;
- Permit a Maximum Podium Height of 7 storeys, whereas the Zoning By-law requires a maximum of 6 storeys;
- Permit a Minimum Tower Separation from the Interior Lot Lines (East) of 4.4 metres, whereas the Zoning By-law requires a minimum of 11.0 metres;
- Permit a Maximum 32% of the required Amenity Space as Outdoor Rooftop Amenity Space located more than 22 metres above grade, whereas the Zoning By-law requires a maximum of 20%;
- Permit a Minimum Setback of 9.0 metres of a railway right-of-way, whereas the Zoning By-law requires 15.0 metres; and,
- That a Holding Provision (H) be applied to the subject property for which the following applies:
 - No development shall be permitted until such time a Record of Site Condition is submitted and approved to the satisfaction of the Ministry of Environment, Conservation and Parks or any successor Ministry; and,
 - No development exceeding 410 metres above sea level shall be permitted until such time an Aeronautical Assessment is submitted and approved to the satisfaction of the Region of Waterloo.

3) Conclusion

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

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

Respectfully submitted,



David Galbraith MCIP RPP
President, UP Consulting



Christian Tsimenidis MCIP RPP
Senior Planner, UP Consulting

APPENDIX A – Comment Matrix

No.	Comment	Response
PART A – OFFICIAL PLAN AMENDMENT		
Official Plan Designations & OPA 58		
1.	The subject lands are designated Employment on Schedule ‘A’ and Business Employment on Schedule ‘A2’ of the Official Plan. The Business Employment designation is intended for prestige office uses. The designation requires high quality urban design. The range of uses permitted in the designation are outlined in policy 10.2.2.2 (3) of the Official Plan, and generally includes a range of office and light manufacturing operations.	As a result of the Province’s approval of OPA 58, we understand that the lands are no longer designated as Employment / Business Employment. Accordingly, it is understood that the site is now designed “Station Area Mixed Use” (SAMU). The revised OPA have been amended to reflect this.
2.	A Municipal Comprehensive Review (MCR), was completed by the Region as part of the Regional Official Plan review and was ultimately approved through Regional Official Plan Amendment 6 (ROPA 6). The subject lands as part of the Potential Transition Area were reviewed and subsequently approved for conversion by the MCR process. The conversion process allows the consideration of non-employment uses on the subject lands.	
3.	The City is in the process of updating the Official Plan. This process is being undertaken in Phases. In December 2024, Council adopted an updated Official Plan that included a new designation for lands identified as a “Potential Transition Area” that were addressed by the Regional MCR process. This new designation is called “Station Area Mixed Use” (SAMU) and is intended to allow a wider range of mixed uses including light employment, community uses, commercial and residential uses.	
4.	As of July 2025, OPA 58 is not yet in effect. OPA 58 requires provincial ministerial approval before becoming in-effect. Until the new Plan is approved, policies of the existing version of the Official Plan will continue to apply.	
5.	Given there is currently no SAMU designation, should this application be advanced prior to the new plan being approved, the SAMU designation will need to be incorporated into a Site -Specific Policy.	
6.	The SAMU designation is intended to allow for a full range and mix of land uses in locations that are in closest proximity to the ION LRT. Most of the lands (including the subject lands) are identified as Potential Transition Areas on Schedule ‘J’ of the Official Plan and include current and former Business Employment lands that are intended to allow for a wider range of uses (beyond office and employment uses) though employment uses remain as important components both from a land use mix perspective, and for transit-supportive land use considerations. The designation allows for both mixed-use sites and/or mixed-use buildings. The designation will provide opportunity for infill development and substantial levels of intensification, while also leading to improvements in mobility, placemaking, and creating a series of vibrant, mixed-use communities.	
7.	The height of the development exceeds the 30-storey maximum outlined in policy 10.5 (2) of the draft Official Plan. The remaining uses proposed are all permitted under the SAMU designation, though the balance is heavily skewed towards primary residential uses.	

8.	Given the prominent location for SAMU-designated sites within very close proximity to the ION LRT stops, the intent of the designation was to allow residential density in addition to non-residential uses.	Acknowledged.
9.	It is noted that as proposed, the development would include less than the required minimum non-residential uses (policy 10.5 (12)) which, would require a minimum of 4,876 m ² of non-residential uses (2,438 units x 2 m ² /unit). Non-residential uses are not limited to retail. A wide range of uses could be considered to increase the non-residential components including community uses, personal services, as well as employment uses. Given the site location adjacent to other existing office and research uses, a continuity of some light employment uses would also be beneficial to the community. In addition to potential commercial and employment uses, part of the non-residential floor space could be allocated to community uses given the introduction of a significantly sized new mixed-use development in an area that to date, has only been designed and intended for Business Employment development. The site being within a Station Area provides a unique opportunity to modernize and augment the planned employment function, with the introduction of residential and mixed-use development.	<p>The revised development proposal contemplates extensive non-residential uses on the ground levels of all of the phases. The ability / practicality of additional non-residential spaces is limited by the relatively minimal frontage onto Columbia Street, where non-residential uses would be most viable.</p> <p>As the revised proposal contemplates a non-residential provision less than what is contemplated by Policy 10.5(12), a site-specific policy is being requested to permit a reduced non-residential requirement. The revised Planning Justification Report outlines the rationale for this approach, including the site's proximity to significant existing employment areas, the master-planned residential focus of the proposal, and the provision of non-residential uses concentrated at-grade to support street activation and daily needs. The proposed mix is considered appropriate in the context of the Station Area and surrounding land use pattern.</p>
10.	The SAMU designation in policy 10.5 (9) requires that development will contribute to achieving the minimum density target of 160 residents and jobs per hectare required for the Station Area. The Planning Justification Report did not explicitly demonstrate how the 160-density target would be achieved, rather simply mentioning that supports the target by providing a mixed-use development. Staff require clarification on the proposed number of residents and jobs that are planned for the site. The number of jobs in particular are relevant to ensuring a balanced and viable mixed-use development.	The revised Planning Justification Report has been updated to clarify how the proposal contributes to achieving the Station Area density target of 160 residents and jobs per hectare. The development introduces a significant number of new residents within close proximity to the LRT, along with on-site employment opportunities through retail and office uses, thereby supporting transit ridership and a mixed-use Station Area.

Urban Design Policies in OP		
11.	The development is subject to the Official Plan's general urban design policies (3.11.1), as well as the specific policies for Nodes and Corridors (3.11.2) and Major Transit Station Areas (3.11.4). Collectively, these policies provide direction for building and site design to ensure high quality buildings and site designs that are attractive, comfortable and prioritize pedestrian movements and convenient access to active transportation and transit networks. Given the high density and close proximity of the proposed development to the R&T Park transit stop, particularly relevant urban design policies are those that relate to landscape and amenities (e.g. 3.11.1(23) and 3.11.1(22)), site circulation (e.g. 3.11.1(11)), connectivity (e.g. 3.11.2(1)), streetscapes (e.g. 3.11.1(4)), and built form and massing (e.g. 3.11.2(6)).	Acknowledged.
12.	Building massing and orientation should ensure convenient, comfortable and safe pedestrian movements through the site and from the site to the R&T Park ION platform from both the east and west sides of the LRT tracks. North-south site circulation should generally align with Schedule 'J3', not just for vehicles but also for pedestrians and cyclists who are accessing the R&T Park ION platform from the crossover point to the east of the LRT tracks. Sufficient, functional and well-designed outdoor landscaped open space should be provided to support the proposed density. Also refer to Part E (Urban Design Comments) below.	The revised development concept includes a clear and continuous north-south internal access corridor centrally located between 170 and 180 Columbia St W, providing a direct pedestrian connection through the site. Pedestrian routes are provided throughout the site and around each building, ensuring safe, comfortable, and legible movement toward the Research and Technology Park ION Station. The proposed layout does not preclude the future extension of any of these connections to lands north of the subject properties as those sites redevelop in the future.
Increased Height and Density		
13.	The Applicant is seeking increased height and density for the lands, Policy 12.3.1 of the current Official Plan contemplates for this. Future submissions to demonstrate how this policy is being satisfied. Staff note through OPA58 this policy was amended and is contemplated for in Policy 3.4(6) – 3.4(8).	Acknowledged.
14.	Future submissions to provide additional information and justification as to why the Lands are appropriate for increased height and density. The City has recently increased height permissions from 25 storeys to 30 storeys (once OPA 58 is approved by the Province), why should further increases be permitted? Should all towers be permitted an increased height?	The revised submission includes additional justification with regards to the proposed height and density based on the site's location within an MTSA and consistency with emerging high-rise development patterns in the area. While OPA 58 establishes a 30-storey framework, site-specific height permissions are proposed to support a cohesive master-planned built form and achieve appropriate tower spacing, massing transitions, and transit-

		supportive density. The proposed tower heights were reduced from the original 37 & 41 storeys to a maximum of 35 storeys.
District Plan		
15.	The Lands are within the Columbia District Plan.	Acknowledged.
16.	This Plan was approved by Council in December 1992, with the most recent amendment in June 2012.	Acknowledged.
Heritage		
17.	Heritage Planning staff does not require the submission of an archeological assessment; however, the applicant should be made aware that: a) If archaeological resources are discovered during future development or site alteration of the subject property, the applicant will need to immediately cease alteration/development and contact the Ministry of Citizenship and Multiculturalism. If it is determined that additional investigation and reporting of the archaeological resources is needed, a licensed archaeologist will be required to conduct this field work in compliance with S. 48(a) of the Ontario Heritage Act; and/or, b) If human remains/or a grave site is discovered during development or site alteration of the subject property, the applicant will need to immediately cease alteration and must contact the property authorities (police or coroner) and the Registrar at the Bereavement Authority of Ontario in compliance with the Funeral, Burial and Cremation Services Act, 2002 S.96 and associated Regulations.	Acknowledged.
Ministry Approval		
18.	It is Staff's understanding as of January 1, 2025 Official Plan amendments, establishing, changing or revoking any policies required as part of a protected major transit station area (PMTSA) in accordance with subsections 17(15) or (16) of the Planning Act authorizing uses of any land within a PMTSA require Ministerial Approval. However, the Province recently proposed Bill 60 which based on Staff's understanding does not require Ministry approval if residential uses would be authorized on all of the land subject to the amendment that is within the protected major transit station area if the amendment came into effect as adopted. Staff are awaiting confirmation of this interpretation from MMAH.	Acknowledged.
PART B – ZONING BY-LAW AMENDMENT		
Zoning		
19.	The Lands are currently zoned Holding – Station Area Business Employment 2 “(H)E2A-81”. It is Staff's understanding the Applicant is seeking to rezone the Lands to Residential Mixed Use (H)(RMU-81) with site specific provisions to facilitate a mixed-use development. While Staff recognize the RMU zone contemplates for mixed use developments of this scale, it is Staff's opinion the Council approved Station Area Mixed Use Zone (SAMU) is more appropriate. This zone was created as the companion zone to the Station Area Mixed Use Designation. The SAMU zone was approved by Council on December 16, 2024 and is currently not in effect. It will be consolidated into Zoning By-Law 2018-050 upon approval of OPA 58. However, should this Application	Acknowledged. See the revised Zoning By-law Amendment request in the Planning Justification Report for SAMU Zone with Site-Specific Provisions.

	proceed to Council prior to the approval of OPA 58, the SAMU zone can be implemented as a site specific exemption.	
Zoning Relief		
20.	<p>Where zoning relief is requested, it must be supported by compelling rationale, and demonstrated that other options were properly considered. Staff encourage the Applicant to comply to the best of their ability and reduce the relief proposed.</p> <p>Within the Planning Justification Report, the following zoning relief was identified.</p>	Acknowledged. See revised Planning Justification Report providing additional planning justification for all site-specific requests.
Staff identified relief		
22.	Staff have identified the following additional relief based on the current drawing set. Additional relief may be identified throughout the process and as the drawings evolve. Staff note additional comments which may impact required zoning relief have been identified under Part C, "Site Plan". Staff have included reference images have been included but note they are not exclusive to areas that require relief.	Acknowledged. Please see the revised Planning Justification Report for details of the Site-Specific relief.
Bedroom Count		
23.	<p>Based on the architectural drawing set, Staff have identified a total of 3,823 bedrooms whereas a total of 3,206 bedrooms are identified. Staff note the stats chart does not include bedrooms for the units identified as Bachelor units. Please verify. The chart below identifies Staff's count.</p> <p>Based on the submission materials, a density of 1,613 bedrooms per hectare (170 Columbia St W) and 2,436 bedrooms per hectare (180 Columbia St W) were proposed. However, based on the increased bedroom count, densities of 1,860 bedrooms per hectare (170 Columbia St W) and 2,999 bedrooms per hectare (180 Columbia St W) are proposed.</p> <p>Staff strongly encourage the Applicant to incorporate 3 bedroom units.</p>	Unit and bedroom counts for density calculations have been revised accordingly.
Unit Count		
24.	Based on the architectural drawing set, Staff have identified a total of 2,523 units whereas a total of 2,438 units were identified. Please verify. The chart below identifies Staff's count. Ensure zoning provisions related to unit count (i.e. bicycle parking) are updated and compliant in future submissions.	Unit and bedroom counts have been revised accordingly.
Building Placement & POPS		
25.	<p>While Staff recognize the Applicant is proposing a POPS to address Parkland dedication, Staff require additional justification as to why unencumbered land cannot be conveyed to the City. If a POPS is to be accepted by the City, additional discussions are to be had regarding the evaluation for parkland, size, placement and location. Furthermore, the Applicant would be required to demonstrate how the City's Guidelines for Privately Owned Public Accessible Spaces are being satisfied. Staff encourage the Applicant to explore opportunities for the dedication of unencumbered land.</p> <p>Staff recommend the Applicant explore shifting Building 1 and Building 2 closer to be together or share a podium. Further, the Applicant is encouraged to explore opportunities for these buildings to share elements such as loading spaces, driveways, etc... If Buildings 1 & 2 were located closer together or had a shared</p>	The revised proposal no longer includes a POPS or parkland conveyance. Following further review of servicing constraints and parkland dedication requirements, parkland dedication is proposed to be satisfied through cash-in-lieu, as the lands available are encumbered and cannot be conveyed as unencumbered public parkland in accordance with City requirements.

	<p>podium, this would allow for the parkland space to generally be in the same location and extend to Columbia Street. Furthermore, depending on discussions regarding the proposed right of way, this may allow for future connections to adjacent properties. Staff note the recommended zone (SAMU) includes a holding provision for master planning (9S.3.16(a)(iv)). This is reiterated in OPA58 policy 10.5(14).</p>	<p>Notwithstanding, it is the intention of the applicant to permit access and use of this space through the site plan approvals process.</p> <p>Building 1 has been shifted to the centre of 170 Columbia Street in order to allow the now Common Outdoor Amenity Space to abut the public ROW.</p>
Amenity Area		
<p>26.</p>	<p>Staff are unable to verify the amount of amenity provided. Based on the number of bedrooms (3, 823), an amenity area of 10,169 square metres is required. This calculation does not include the required common outdoor area. Future submissions to include a graphic representation of areas included in the amenity space along with a calculation. Ensure compliance with the definition in the Zoning By-Law and provision 3.A.4.</p>	<p>Please see the architectural package that identifies the amenity space provided for the proposed development.</p>
Mezzanine & Storeys		
<p>27.</p>	<p>It appears the mezzanines identified on drawing A104 in the Architectural package do not meet the definition of mezzanine in Zoning By-Law 2018-050, or the regulations in provision 3.M.2B. Furthermore, it appears each of the mezzanine spaces are only accessible via door rather than being open to the storey below. If this continues to be proposed, Staff will view this as an additional storey .</p>	<p>Not identified as an additional storey in accordance with the Zoning By-law.</p>
Holding Provision		
<p>28.</p>	<p>As the submission materials indicated, the Lands are subject to a holding provision due to their proximity to the rail corridor. Staff recognize a Transportation Noise and Vibration Assessment was submitted, however it continues to be under review by CN Rail and the Region of Waterloo. Furthermore, the Staff are recommending the SAMU zone be applied to the lands, which includes a holding provision. Following receipt of comments from the Region, City Staff may recommend additional provisions be added to the holding provision.</p> <p>The following is to be included in a proposed holding provision:</p> <ul style="list-style-type: none"> • 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. • The developer will need to submit a Land Use application to Nav Canada for the buildings and cranes and obtain a letter of no objections to the satisfaction of the Region of Waterloo. • Provision 9S.3.13 of the Station Area Mixed Use Zone. • Additional provisions identified by the City and or Region following receipt of comments relating to the Noise & Vibration Study and Development Viability Assessment Report. 	<p>Acknowledged.</p>

	<ul style="list-style-type: none"> Additional provisions identified by the City and or Region as the drawings evolve. 	
Property Line		
29.	Staff require clarification as to why drawing A100a proposes property lines internal to the existing properties. The RMU zone and SAMU zone both allow for multiple buildings per property. If property lines are proposed, future submissions to speak to the mechanism for division.	Property lines have been revised accordingly.
Landscape Open Space		
30.	<p>Staff require additional information as to what areas have been included in the landscape open space calculation. Staff recognize a reference image was included on drawing A100b, however Staff are unable to determine if the areas included meet the definition of Landscape Open Space. If each phase is intended to be a separate property, each will need to demonstrate compliance with 30% landscape open space or zoning relief will be required.</p> <p>Staff also note if the POPS is to be accepted by the City as part of the parkland dedication, it cannot be included in the calculations of Landscape Open Space, Amenity Area, Common Outdoor Space, etc.</p>	Please see the architectural package that identifies the Landscaped Open Space breakdown for the proposed development. Both sites will meet the minimum requirement of 15% in the SAMU Zone.
Affordable Housing & Inclusionary Zoning		
31.	The Lands are located within a Protected Major Transit Station and are therefore subject to the Official Plan policies and Zoning By-law regulations related to Inclusionary Zoning. City of Waterloo has approved Inclusionary Zoning provisions through By-law 2024-058 and as amended by Zoning By-law 2025-11. Currently the implementation of the set aside rate (Regulation 3.1.2.c) is not in effect and is deferred to 'an undetermined date in the future.' Please note that Council will be considering in early 2026 a report to determine the date of implementation of Inclusionary Zoning. Staff strongly encourage the Applicant to include affordable housing within the development as there are policies within the Official Plan that support this.	Acknowledged.
PART C – OTHER CONSIDERATIONS		
Site Plan		
32.	<p>Staff have provided preliminary high level site plan comments for implementation as it may impact proposed zoning relief.</p> <ul style="list-style-type: none"> Access to storage rooms in the underground parking. If the adjacent vehicular parking spaces are occupied, how are the storage rooms accessed? Ensure accessible parking aisles are not used for primary access from underground parking into building. Parking Level 1, Phase 2 – irregular parking layout adjacent to corridor and ramp. Confirm overall parking count. Parking Level 1, Phase 5 – irregular parking layout adjacent to ramp and storage room. Confirm overall parking count. Identify area wells for underground parking on site plan if required. Ensure vehicular parking movements do not conflict with proposed doors and pedestrian pathways. Ensure proposed air shafts do not conflict with vehicular turning movements. Identify any retaining walls. 	Please see the revised architectural package prepared by AAA Architects that addresses these comments accordingly.

	<ul style="list-style-type: none"> Identify area wells, and if they are at grade or above. Ensure accurate property lines. It appears the driveway from Columbia St W is overlapping with the property line of 170 Columbia St W. Ensure minimum parking space sizes are being provided (i.e adjacent to a column/wall). Typical spaces to be identified and dimensioned. 	
Condo application		
33.	<p>It is Staff's understanding Phase 1 is to be purpose built rental and Phases 3-5 are intended to be a single condominium. Staff require clarification on the type of condo proposed for Phases 3-5, is a phased condo proposed or a different kind. Staff require additional information on the future ownership tenure of Phase 2.</p> <p>Future condo applications will be required.</p>	<p>The applicant is proposing to advance the first phase as a purpose built rental development. Subsequent phases are currently anticipated to be developed as condominiums, however this is subject to change in response to market realities. Phase 2 is currently proposed as a condominium.</p>
176 Columbia St W		
34.	<p>Still recognize the development agreement and associated easement on 176 Columbia Street W in favour of 170 & 180 Columbia Street W will need to be updated to reflect the proposed development. Additional easements may be required as well and will require a consent application.</p> <p>Staff require additional information on how the proposed developments will function with 176 Columbia Street W as it currently exists and any future development. Staff note the recommended SAMU zone includes a holding provision for master planning. Staff also require confirmation from 176 Columbia St W they are in support of the development utilizing the existing right of way.</p>	<p>Acknowledged.</p>
Previous COA Applications		
35.	<p>The Applicant received approval from the Committee of Adjustment in October 2021 to sever an area of approximately 237 sq.m (Part 23 and Part 12 on 58R-8516) and consolidate to 170 Columbia St West. It is Staff's understanding the registration was completed in June 2025 and final documents from the Land Registry Office are expected shortly.</p>	<p>Acknowledged.</p>
Proposed Right of Way		
36.	<p>Further discussions are to be had regarding the proposed right of way. These discussions are to include Transportation and Engineering Staff. Is the proposed Right of Way intended to function as vehicular connection, pedestrian connection or both? Staff recognize this connection was identified on Schedule J3 of the Official Plan as a potential priority connection.</p>	<p>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 170 Columbia St W were to redevelop, this area of the subject lands has been designed so that it could be</p>

		converted into a municipal right of way if additional lands from properties to the east are made available for such purposes.
Land Use Compatibility		
37.	Comments have been received from the Peer Review and are attached as Appendix E. Future submission to address comments and demonstrate how they have been addressed.	Acknowledged. See responses further below.
Noise		
38.	Comments have been received from the Peer Review and are attached as Appendix F. Future submission to address comments and demonstrate how they have been addressed.	Acknowledged. See responses further below.
Employment Area in Building		
39.	<p>While Staff recognize the subject lands have been evaluated through the Region’s MCR process, it is crucial to retain employment functions while also allowing for the introduction of new uses, such as residential. The loss of employment lands, needs to be offset by the creation of other employment opportunities. Based on the Station Area Mixed Use designation, a minimum of 2 square metres of non residential space (i.e. commercial, employment and/or community space) per residential unit are required. This is intended to create a mixture of uses that will support the community that is being proposed. This is supported by the findings of the City’s Commercial and Employment Area Policy Review completed in September 2022.</p> <p>The proposed development represents an opportunity to create a transition from the remaining existing employment by permitting a mixture of land uses including, residential, commercial and light employment. The Station Area Mixed Use designation, already contemplates for a wide range of employment and commercial uses in addition to complementary uses. Staff encourage the Applicant to evaluate the permitted employment and commercial uses in the draft designation to see if there are ways to incorporate them into the proposed development as it is crucial employment and other non residential uses be further incorporated to support the number of residents proposed.</p> <p>Future submissions to indicate what areas within the building are non residential versus functional for the building (i.e. office space for building manager).</p>	While the revised development contemplates extensive at-grade non-residential uses, the revised proposal does not achieve the minimum non-residential floor area contemplated by Policy 10.5(12); accordingly, a site-specific policy is being requested to permit a reduced non-residential requirement. The revised Planning Justification Report outlines the rationale for this approach, including the site’s proximity to significant existing employment areas, the master-planned residential focus of the proposal, and the provision of non-residential uses concentrated at-grade to support street activation and daily needs. The proposed mix is considered appropriate in the context of the Station Area and surrounding land use pattern.
Station Area		
40.	The subject lands are in the Research and Technology Station Area, and subject to the Station Area policies (section 3.8 of the current Official Plan and 3.5.3 in the draft updated Official Plan. The subject lands are located in “Area A” of the Station Area with the intent to ensure the most density and transit supportive uses in closest proximity to the LRT stop (policy 3.8.1(5)). The Station Area policies further provide that the ground floor areas should provide for animated streetscapes, and that buildings should be mixed-use (policy 3.8.1(5)(a) and (b)).	The proposed development incorporates a central north–south access aligned with the intent of the Schedule J3 priority connection, supporting pedestrian movement. While the subject lands do not currently extend to the LRT station, the site layout intentionally preserves the

	<p>Connectivity is a priority for the City's Station Areas. For the R&T Park Station Area in particular, a potential priority connection is identified in Schedule 'J3'. This connection runs through the Lands. The rationale for the establishment of the priority connection is to break up the large blocks north of Columbia Street West and to enable greater pedestrian access to the R&T ION platform from the east side of the LRT tracks, as well as limited access to individual buildings. While an easement is maintained in the proposed development splitting 170 from 180 Columbia, there does not appear to be a purposeful and enhanced connection from the development to the ION LRT stop. If this development is intended to be a Transit Oriented Development, a high-quality active transportation connection to the LRT stop should be provided. It is unclear how direct access to the R&T LRT stop will be maintained/achieved.</p>	<p>opportunity for future connections to be established through adjacent lands to the north. This approach balances immediate functionality with long-term connectivity objectives for the Station Area.</p>
Complete Community		
<p>41.</p>	<p>The Official Plan requires development in the City to contribute to creating a complete community, which is created through the inclusion a range of important community elements (parks, open space, active transportation etc.) and "community infrastructure". Creating a new large urban community in an area that was not previously planned for residential uses puts the onus on the proponent to help create a more complete community.</p> <p>Policy 3.9.1 of the Official Plan outlines elements that are required to create a complete community within the City's Planning Districts.</p> <p>With the introduction of a significant amount of new residents to the area, it is noted that the current development proposed only minimal access to community Infrastructure and day-to-day convenience uses for residents and employees alike. As an existing employment area, there is little to no current access to community infrastructure and community spaces.</p> <p>Policy 3.8.2(1) requires a strong sense of place making.</p>	<p>The revised Planning Justification Report addresses how the proposal contributes to a complete community through the provision of on-site amenity spaces, non-residential uses, enhanced pedestrian connectivity, and proximity to transit. The development supports placemaking objectives by introducing a vibrant mixed-use environment in an area undergoing transition.</p>
PART D - URBAN DESIGN COMMENTS		
Sun/Shadow		
<p>42.</p>	<p>More than half the proposed open space/POPS is in shadow after 11am between at least September 21st – March 21st (equivalent to half the year).</p>	<p>The now Common Outdoor Amenity Space has been moved to the front of 170 Columbia St W to maximize sunlight and/or minimize shadowing, whereas the previous iteration where it was between the towers in Phases 1 and 2.</p>
Wind Study		

<p>43.</p>	<ul style="list-style-type: none"> • The Wind Study clearly indicates that the proposed tower configuration will result in wind speeds above the general recommendation for the intended usages. Short of modification to the tower configuration, extensive widespread mitigation will be required. • The Wind Study provides various reactionary solutions to help dampen the wind conditions, however, UD staff are of the opinion larger mitigative measures need to be explored, such as shared podiums, as well as the potential relocation of the primary open spaces to be located where wind speeds are conducive to ‘sitting’ through most seasons, as opposed to only ‘standing’ as designed today. • Comfort at-grade is fundamental for a pedestrian-oriented community such as this to align with Station Area Planning objectives. More care needs to be taken to improve the overall microclimatic conditions in the public realm. 	<p>The applicant has considered the option of the inclusion of shared podiums, particularly on the western side of the development, but for urban design and connectivity-related objectives maintains that separate towers would facilitate a more human scaled development and avoid massing implications of large shared podiums.</p> <p>The revised development concept shifts the placement of buildings throughout the site, with a key design change relating to relocating the large outdoor amenity space to the front of 170 Columbia Street which should assist in mitigating some wind related concerns associated with its previously identified location. The applicant is proposing that additional wind studying be prepared as part of future site plan applications to ensure that appropriate mitigation is provided.</p>
<p>Site Organization</p>		
<p>44.</p>	<ul style="list-style-type: none"> • As designed, the independent towers produce a very short block structure resulting in multiple “streets” and driveways. UD staff encourage the consolidation of towers into shared podiums. Shared podiums will be beneficial from a number of perspectives including but not limited to: <ul style="list-style-type: none"> ○ Providing longer blocks/street walls that can be activated while pushing back-of-house uses to the rear elevations; ○ Mitigating wind tunnels, and buffering the whole new neighbourhood from the prevailing westerly winds; ○ Reducing the number of pedestrian/vehicular conflict points created by the multitude of blocks. • Shared podiums will also result in additional GFA, and the ability to share amenities, parking, servicing, loading, and/or commercial facilities between multiple buildings. 	<p>The proposed development continues to advance independent towers with individual podiums, as this approach provides greater flexibility for phasing, construction staging, and potential future ownership or aligned with property boundaries. The podiums are designed to maintain an active public realm and coherent streetwall condition, while servicing functions are appropriately internalized and screened. Potential wind impacts can be effectively mitigated through architectural elements and landscape design, rather than relying solely on shared podium configurations. As noted, through future site plan</p>

		approval processes, detailed wind modelling will be undertaken to ensure that appropriate mitigation is incorporated.
PART E - ENVIRONMENTAL PLANNING COMMENTS		
Energy Study		
45.	Since the report did not provide an overview of the proposed developments, there is some uncertainty around what baseline components/methods are currently being considered. However, staff have reviewed the report in consideration of the information available within the first submission, including the Planning Justification Report, and accept the Energy Study.	Acknowledged.
46.	The applicant is strongly encouraged to pursue the energy conservation methods identified and recommended in the Energy Study and construct in a manner consistent with the High Performance or Net-Zero Ready Performance scenarios, and to implement the design solutions related to greenhouse gas emissions reduction, renewables, embodied carbon and resiliency.	Acknowledged.
PART F - DEVELOPMENT ENGINEERING COMMENTS		
47.	The City is generally satisfied with the approach to development laid out in the FSR with respect to sanitary and storm sewer capacities and watermain supply.	Acknowledged.
48.	Grading and Drainage from the site is to be designed such that overland flows do not negatively impact adjacent properties. The major overland flow route from this property should be directed to the right of way and not to the adjacent property.	WalterFedy met with City Development Engineering Staff to discuss and note that major overland flows can be routed towards the 176 Columbia access, in line with existing conditions.
49.	A detailed water distribution analysis evaluating fire flow and domestic flows will be required at the detailed design stage.	Acknowledged.
50.	Development proposes an underground parking structure. Engineering consultant has noted the Region of Waterloo does not permit permanent discharge systems to control groundwater. This is also a City of Waterloo standard.	Acknowledged.
51.	Further details will be required during the Site Plan submission process and detailed design stage for review and acceptance by the City of Waterloo Engineering Services division.	Acknowledged.
PART G – LANDSCAPE ARCHITECTURE		
52.	A Vegetation Management Plan (VMP) will be required as part of the future Site Plan process(es). Staff note that while the internal portion of the subject land does not contain trees, there are several boundary trees along and adjacent to the subject properties. The VMP is to capture trees within 6m of the property. The design of the development shall ensure the preservation of trees located on the adjacent properties and shall minimize construction and grading impacts within the required Tree Protection Zone (refer to the CELM). As noted above, although the VMP is not required until the Site Plan stage, it is recommended that these constraints are considered through the Zone Change process to ensure successful preservation of neighboring trees.	Acknowledged. An updated Vegetation Management Plan provided as part of the resubmission package.

53.	All impacts to/removal of City-owned trees or trees with shared ownership with the City shall be in accordance with the City Tree Bylaw (No. 2014-078).	Acknowledged.
54.	Per the objectives outlined in Section 8.2.9 (2) of the Official Plan, the City recommends a replacement rate for trees to be removed at a ratio of 2:1. Anticipated tree removals associated with this application should consider a compensation strategy as early in the planning process as possible to maximize tree planting on site.	Acknowledged.
55.	Any tree clearing shall be in accordance with the federal Migratory Birds Convention Act, 1994, and the provincial Endangered Species Act, 2007. Clearing activities shall be completed in accordance with all recommended bird nesting windows and the protection of Species at Risk habitat.	Acknowledged.
56.	Staff appreciate the conceptual landscape design which demonstrates opportunities to enhance and strengthen the streetscape/street facing quality of Columbia Street West, activating the public/private interface. Further detailing is anticipated at the Site Plan stage for the respective phases. Elements could include, but are not limited to, street trees, enhanced planting and paving and site furnishings where appropriate.	Acknowledged. To be provided at the site plan approvals stage.
57.	Staff note that a POPS is proposed on the west side of the development lands, behind Tower 1. The Planning Justification Report suggests that the POPS, if accepted, may be conveyed to the City. This would, in effect, represent a parkland dedication with the transfer of ownership. Please refer to Planning and Parks staff comments for feedback related to Parkland dedication vs. POPS. Staff note that Landscaped open space (LOS) represents an important component of a functional mixed-use community and the City appreciates the accommodation of such spaces within the context of infill. Similarly, due to increasing population density and the current shortfall of parkland within Waterloo, the City has a strong preference for acquiring parkland over cash-in-lieu of the required land dedication. Finally, it should be noted that for the purposes of LOS calculation and requirements, POPS will not be counted towards parkland dedication. Further, dedicated parkland does not count towards the City's minimum LOS requirement.	As noted, the revised submission removes the POPS concept and replaces it with a common outdoor amenity area in front of the Phase 1 building on 170 Columbia Street W. Parkland dedication will be addressed through cash-in-lieu, consistent with City policy where unencumbered land dedication is not feasible.
58.	Further to comment #5, considering the scale of the development and the unit intensification, staff request that the applicant provides an assessment of the park needs for the development lands. The study should determine specific park features and programming that are required for parkland in this context (based on location, anticipated residents, proximity to existing amenities, etc.).	Acknowledged. The specific programming of the common amenity spaces located through the subject lands will be determined at the Site Plan Application Stage. A revised conceptual plan is included as part of this resubmission showing a conceptual vision for this area.
59.	Landscape staff offer the following general observations and feedback with respect to any POPS spaces that may be considered as part of the development. Note: acceptance of POPS within the context of this development is subject to Planning Staff feedback pending Parkland requirements and/or priorities. Refer to City of Waterloo Guidelines for Privately Owned Public Spaces (POPS) (2019) for additional information and reference: (https://www.waterloo.ca/en/government/resources/Documents/Development-applications/Guidelines-for-Privately-Owned-Accessible-Spaces.pdf)	Not applicable, as the revised development no longer proposes a POPS. Landscape design has instead been refined to support high-quality resident Outdoor Common Amenity spaces and enhanced streetscape conditions.

	<ul style="list-style-type: none"> The POPS should ideally be constructed and operational as part of the first phase of development to ensure that there are no amenity deficiencies for initial residents (based on the current proposal of POPS in phase 2, a temporary POPS condition appropriate in size and function to phase 1 occupancy should be considered at a minimum). To be a functional POPS, clear access from the public realm is important. Both visual and physical direct connections between the POPS and the adjacent community are critical to ensuring its success. The revised concept should further explore these constraints to ensure that meaningful POPS space is achieved as the current layout is isolated from the public interface. 	
60.	Staff anticipate that the development will result in a significant increase in the dog population for the area. Based on the City's experience with similar intensification developments, there will likely be a demand for off-leash dog facilities for future residents. Refer to Parks comments for further details regarding requirements for these amenities in accordance with the City's Parkland Strategy.	Acknowledged.
61.	Staff note that there is an opportunity for a pedestrian connection along the west limit of the property. Consider a walkway/trail along this part of the development, which would ultimately allow for a future connection to the Laurel railway, pending the development of lands to the north.	In addition to the central north-south access, the revised concept provides pedestrian circulation throughout the site and along building frontages, enhancing overall permeability.
62.	The City's current standard minimum sidewalk width is 1.8m. It appears that the width shown on the site and landscape plans is the existing 1.5m. While there are some utility constraints to be considered, there should be room to provide a new 1.8m sidewalk that widens toward the development (north) for the portion to the east of the driveway and to the south on the portion to the west. Please review and adjust accordingly. Refer to Transportation staff comments for any additional feedback.	A 1.8 metre sidewalk is provided on the Site Plan and Landscape Plan completed as part of this resubmission package.
63.	Large growing shade tree planting should be maximized throughout the site, particularly adjacent to amenity functions, pedestrian routes and driveway/parking areas. Staff note that many of the proposed trees shown on the concept are within the projected limits of the underground structure. A stratified condition presents challenges for minimum planting depths. Soil volume requirements for both shade tree planting and other forms of soft landscaping should be planned for as early in the design process as possible to ensure that adequate conditions are provided for successful tree establishment (refer to the CELM for details related to minimum soil requirements).	Acknowledged.
64.	Currently, a high quantity of hardscape treatments is proposed throughout the phases. At the Site Plan stage, high albedo materials should be introduced for as much of the hard surfaces as possible to limit the urban heat island effect associated with the development.	Acknowledged.
65.	It appears that overhead hydro along Columbia Street West may restrict the type of tree planting along the site frontage. Ideally, species with some form of impactful canopy would be preferred, pending Enova requirements. These should be reviewed early in the design process in an effort to maximize tree planting across the site.	Acknowledged.
66.	Amenity terraces are identified in all 5 towers (level 37 for towers 4 and 5 and level 41 for towers 1-3) Based on the density of the proposed development, these common roof terraces will provide an important outdoor amenity option for the prospective residents. Although details of such terraces would not be advanced until	Acknowledged.

	the Site Plan stage, Staff advise that a structural engineer should be involved as early in the development process as feasible to ensure that the subject tower roofs are designed to provide structural support for adequate soil volumes for long term tree growth. Large canopy trees and other landscaping such as shrubs, perennials, etc., are expected and will greatly enhance the rooftop amenity spaces.	
67.	The pedestrian level wind assessment reviews the preliminary comfort levels at the ground floor and amenity terrace levels for each of the towers. The report identifies some of the positive features in the conceptual ground floor landscape plan and notes that the effectiveness of the treatment will be verified through future wind tunnel tests. Ensure that the recommendations provided in the report are reviewed and implemented into the Zone Change concept and, ultimately, into the detailed Site Plan design.	Acknowledged.
68.	Based on the proposed density and distribution of the towers, there will be planting challenges to be addressed from a shade perspective. The shadow study should be reviewed carefully when fine - tuning the location, layout and detail associated with planting areas and open spaces.	Acknowledged. The specific programming of the landscaped area located through the subject lands will be determined at the Site Plan Application Stage.
69.	Staff note a slight at-grade encroachment into the portion of the lands proposed as 'ROW'. There appears to be a minimum of 6m of clearance at the points of encroachment which may be sufficient to address the access intent for this ROW. Staff are flagging this for reference and acknowledge that previous discussions with City staff may have addressed the details of the ROW. Refer to Planning and Transportation Staff comments for any further feedback.	Revised. No building encroaching into ROW.
70.	The applicant is seeking a reduction in the required Landscape Open Space (LOS) for the 180 Columbia Street West property from 30% down to 21%. While Staff appreciate that there are many competing priorities on infill developments, landscape space represents an important component of the site function and should be incorporated into the site design intentionally and as early in the process as possible. Providing tree canopy coverage over the site to reduce urban heat island effect (especially over surface parking and driveways) and breaking up impervious space with soft landscaping are important functions of a meaningful landscape plan and should be prioritized. Pending other submission feedback, there may be adjustments to the site plan layout that allow for additional LOS to be created. Prior to confirming a reduction, please provide a revised plan that demonstrates the provision of as much planting as is feasible in whatever additional site plan area is made available. Refer to the CELM for LOS definitions and exclusions.	Please see the architectural package that identifies the Landscaped Open Space breakdown for the proposed development. Both sites will achieve the minimum requirement of 15% in the SAMU Zone.
71.	At the detailed design stage, ensure that sufficient space is provided between the west limit of the driveway curb (and associated below-grade footprint) and the property limit to accommodate mitigation features such as privacy/acoustic fence, retaining wall, etc.	Acknowledged.
72.	Ensure that recommendations outlined in the noise and vibration study are implemented at the Site Plan stage. If any of these measures will have material impacts to the site plan layout, they should be demonstrated as part of the applicable revised Zone Change concept plans.	Acknowledged.
73.	Consider green roof treatments for the tower roofs where feasible as well the balance of available roof area that is not programmed. Green roofs can provide both environmental and overlook benefits to the development.	Acknowledged. Feasibility will be determined at the Site Plan Application Stage.

74.	The Landscape design should consider all applicable accessibility standards to ensure adequate provisions for accessibility within the context of a comprehensive pedestrian network. Since the towers are dispersed independently throughout the property, the at-grade hardscape elements are fragmented, particularly from a pedestrian perspective. The pedestrian realm will require the introduction of intentional design elements to ensure clear, seamless, safe and accessible routes throughout the development lands. The details associated with the pedestrian realm can be developed at the Site Plan stage, but the refined concept should demonstrate any site plan/landscape plan adjustments that address this aspect of the design.	Acknowledged.
PART H - TRANSPORTATION SERVICES COMMENTS		
75.	Section 1.2 Study background mentions “two accesses are proposed on Columbia Street: one stop - controlled access, and one signalized access”. More discussion with the Region of Waterloo staff is required regarding a signal at either site access given the proximity to surrounding signals. If the signal is not approved, an addendum to the TIS will be required to analyze Access 2 being a side street stop with free flow along Columbia Street.	<p>Refer to Response Letter to Transportation Impact Study (TIS) is prepared by GHD dated January 22, 2026.</p> <p>Section 3 of the TIS Response Letter conducts the capacity analysis for Access 2 as a stop control intersection at Columbia St.</p> <p>Based on the analysis, the intersection of Access 2 and Columbia St is expected to operate at good Levels of services (LOS ‘C’ or better) with no critical v/c ratios (0.46 or less) and queuing issues (5 m or less) to report under the total traffic conditions.</p>
76.	Is the “new ROW” a proposed municipal right-of-way? If so, it will need to meet municipal requirements.	<p>As detailed in the Planning Justification Report, the applicant is proposing a 9 m allowance along the east side of 170 Columbia Street which will be used as a private drive aisle as an interim condition.</p> <p>This access aisle has been provided in this location to provide future flexibility for the conversion to a municipal ROW, which would require a similar allowance of 9 m on adjacent lands.</p>
77.	The current site configuration requires both properties to be accessed via an easement on 176 Columbia Street. The City requires confirmation that the Owner of 176 Columbia Street approves the additional traffic on the parcel, including level of service, expected queues, etc.	The SYNCHRO analysis under STOP control at Access 1 in the Response Letter, January 22, 2026, indicated good

		Levels of service 'C' or better with v/c ratios of 0.46 or less. With respect to queuing, the analysis results indicate 20 m or less queues during the AM and PM peaks, which can be accommodated.
78.	If no signals are proposed, what are the impacts to Access 1 and 2? How does that interfere with queues and delay?	See Responses #75 and #77.
79.	Please confirm that these sites will only have access to Columbia Street. There will be no access to Phillip Street through the adjacent properties.	There are internal roadways connected to Phillip Street via the adjacent properties that are closed off by concrete blocks. However, all site traffic in the analysis was assigned to the accesses on Columbia Street, and no site traffic was assigned to Phillip Street.
PART I - BUILDING STANDARDS		
80.	Construction proposed within proximity to the Railway. a) Reports from rail corporation will be required to verify construction. It is the responsibility of the owner and designer and other departments to confirm rail requirements are achieved (i.e. structural, vibration, noise measures etc.) b) Any engineered structural requirements/details should be submitted as part of a building permit application(s).	Acknowledged.
81.	Site Servicing plans to be submitted with future development applications indicating how 170, 176 & 180 services exist and/or are proposed for water, sanitary and sewer. If services are shared between buildings on separate properties and are in or proposed to be in contravention with the Ontario Building Code for Shared Services. Initial written clearance from both the Chief Building Official and Director of Engineering is required at the earliest stages of development to consider an alternative solution application (via Building Standards) with a supporting Shared Private Servicing Agreement (via Engineering & Legal).	Acknowledged. Please see the revised Civil Plan and FSR/SWM Report prepared by WalterFedy for details.
82.	A Record of Site is required for this property due to the proposed change of use on the property.	Acknowledged.
PART J – FIRE		
83.	To be provided under separate cover when received.	Acknowledged.
PART K – PARKS, FORESTRY AND COMMUNITY SERVICES		
84.	The parkland dedication shall be in accordance with the Planning Act and the City of Waterloo Parkland Dedication bylaw. PFCS requests that 100% parkland dedication be satisfied through the provision of land and does not support the provision of cash-in-lieu for this development. The land dedication shall be in one piece, not multiple smaller pieces.	The applicant acknowledges PFCS's preference for land dedication; however, due to servicing infrastructure and site constraints, the subject lands cannot accommodate unencumbered parkland that meets City requirements. As such, parkland dedication is proposed to be satisfied through cash-in-lieu in

		accordance with the Planning Act and City policy.
85.	PFCS requires that the proposed land dedication be rectangular in shape (between 1:1 and 1:2), or as close as possible. No sharp angles or oddly shaped forms will be accepted.	Not applicable, as no land dedication is proposed. The revised approach avoids the provision of constrained or non-feasible parkland blocks.
86.	PFCS requires that the proposed land dedication have one whole frontage open to a public street. PFCS therefore requests that the parkland dedication be provided on the south end of 180 Columbia Street West, the location currently showing building #3. This location also ensures better sun exposure than in a location where proposed tall buildings would significantly shade the park block.	The former POPS, now common outdoor amenity space, has been revised to front Columbia St W.
87.	The expectation is that at full buildout the park block will include amenities that support both active and passive uses for the community, not just serve as passive public gathering point that is currently proposed. As such, the park block shall include amenities such as playground, play fields, play courts (e.g. basketball, tennis, pickleball, etc.), skating rink, gathering areas, etc. The applicant should complete a parks needs assessment, to help understand specific active and passive recreational needs in this context. The amenities provided on the park block shall be based on this assessment and fulfil both the active and passive recreation needs of the community.	Acknowledged. The specific programming of the landscaped areas and common outdoor amenity space located through the subject lands will be determined at the Site Plan Application Stage.
88.	The proposed park block shall not include an off-leash amenity for dogs. In accordance with the Parkland Strategy, when intensification results in high densities, opportunities for creating dog facilities within the footprint of these developments need to be explored as a solution to accommodate pet owners on their own sites. Therefore, the applicant shall provide an amenity for dogs on the private property. The size and features of this private amenity shall be appropriate for the expected number of dogs at this development.	Acknowledged.
89.	PFCS preference is land dedication vs. the provision of POPS. In accordance with the Parkland Dedication Bylaw, the proposed park block shall not be encumbered. This includes above ground and underground infrastructure, such as utility lines, swales, infiltration galleries, steep slopes, etc. These encumbrances significantly restrict the area that can be used for park amenities and therefore they will not be accepted. Where encumbrance is unavoidable, for the provision of POPS to be considered for acceptance, the proposed POPS shall comply with all requirements for land dedication, including the requirements for one piece (not multiple smaller pieces), shape, location, requirement to complete a parks needs assessment, requirement for the provision of active and passive amenities (as per the assessment), etc., as described above.	Not applicable, as the revised submission no longer includes a POPS or land dedication. The decision to proceed with cash-in-lieu reflects the presence of unavoidable encumbrances that would limit the usability of any conveyed lands.
90.	PFCS encourages the proponent to provide a pedestrian link along the western property line, adjacent to the LRT line. At this time this trail would serve as a connection from buildings #4 and #5 to the park block (in location currently showing building #3) and Columbia Street West. In the future, if/when the sites to the north redevelop, the pedestrian link could also provide a valuable connection to the “Research and Technology” LRT stop at Wes Graham Way.	The proposed development incorporates a central north–south access aligned with the intent of the Schedule J3 priority connection, supporting pedestrian movement. While the subject lands do not currently extend to the LRT station, the site layout intentionally preserves the opportunity for future connections to be

		established through adjacent lands to the north. This approach balances immediate functionality with long-term connectivity objectives for the Station Area.
PART L – Economic Development		
91.	Economic Development supports development, in theory, at 170 and 180 Columbia Street West (the “Subject Lands”) and recognizes the significant investment it represents within the community. While we acknowledge the growing need for additional housing across the city, our primary mandate remains focused on fostering economic vitality by ensuring that sufficient employment land is preserved to support both current and future industry needs. Economic Development offers the following comments as it relates to the proposed applications for the Subject Lands.	Acknowledged.
92.	Economic Development supports comments regarding the intent of the Station Area Mixed-Use designation. In particular, we agree with the need to incorporate a greater proportion of commercial and/or employment uses within the development to help realize the vision of a complete, transit-oriented community on this strategically located site.	Acknowledged.
93.	While Official Plan Amendment (OPA) 58 is currently pending approval by the Ministry, Economic Development understands that the Subject Lands fall within the Station Area Mixed-Use designation. This designation reflects the intended policy direction endorsed by Planning and approved by Council, and is consistent with the objectives of Regional Official Plan Amendment (ROPA) 6, which re-designates the lands from Employment.	Acknowledged.
94.	The Station Area Mixed-Use designation represents a strategic response to evolving trends and demographics within the city. It supports a modern, forward-thinking vision for transit-oriented development and the creation of complete communities. The designation permits a broad range of uses, including light industrial and employment uses, which can be effectively integrated within mixed-use developments to generate employment opportunities in this highly accessible location within the station area.	Acknowledged.
95.	While the designation envisions residential uses as a component of large-site developments, it also emphasizes the importance of combining residential with an appropriate range and amount of non-residential uses to create vibrant, transit-oriented communities. Based on a preliminary review, the proposed development allocates less than 1% of its total gross floor area to non-residential uses—approximately 0.34% to retail and 0.65% to office space. This falls significantly short of the requirements set out in Policy 10.5(12) of the Station Area Mixed-Use designation, which mandates a minimum non-residential floor area for developments exceeding 1,000 residential units. The proposed development does not meet the minimum threshold of 4,876 sq m.	Acknowledged.
96.	Given the substantial residential density proposed, the site's proximity to the Research and Technology Park and ION Station, and the importance of fostering balanced, transit-supportive communities, Economic Development recommends that the inclusion of additional non-residential floor space be strongly considered as part of this proposal.	The proposed development does not achieve the minimum non-residential floor area contemplated by Policy 10.5(12); accordingly, a site-specific policy is being requested to permit a

		reduced non-residential requirement. The revised Planning Justification Report outlines the rationale for this approach, including the site's proximity to significant existing employment areas, the master-planned residential focus of the proposal, and the provision of non-residential uses concentrated at-grade to support street activation and daily needs. The proposed mix is considered appropriate in the context of the Station Area and surrounding land use pattern.
97.	The proposed development involves the demolition of approximately 6,782 sq m (73,000 sq ft) of gross floor area currently dedicated to employment uses, located within the existing single -storey office building at 170 Columbia St W and the four-storey office building at 180 Columbia St W.	Acknowledged.
98.	Given the property's location and the broad range of employment-generating uses permitted on site, Economic Development requests that the amount of commercial and employment -related floor area included in the new development be commensurate with what is being removed.	The proposed development does not meet the minimum non-residential floor area contemplated by Policy 10.5(12); accordingly, a site-specific policy is being requested to permit a reduced non-residential requirement. The revised Planning Justification Report outlines the rationale for this approach, including the site's proximity to significant existing employment areas, the master-planned residential focus of the proposal, and the provision of non-residential uses concentrated at-grade to support street activation and daily needs. The proposed mix is considered appropriate in the context of the Station Area and surrounding land use pattern.
99.	The currently proposal includes only 526 sq m (5,662 sq ft) of office space, with individual units ranging from 22 to 128 sq m (236 to 1,378 sq ft). These unit sizes are relatively small and may be limiting for prospective tenants and the range of employment uses they can accommodate. To support a more viable mixed-use development, aligned with the Station Area Mixed-Use designation, it is recommended that one or more buildings within the development incorporate additional floors dedicated to employment uses.	The proposed office spaces have been included as part of Phases 2, 4 and 5, and are intended to support smaller-scale employment uses appropriate to the site context and phased nature of the development. Flexibility has been incorporated to allow units to be

		combined or adapted over time in response to market demand.
100.	Furthermore, the employment space should be designed to include appropriately sized and demisable units that can appeal to a broader range of tenants. There is a growing demand for office spaces, particularly in the range of 929 to 1,394 sq m (10,000 to 15,000 sq ft), as businesses are increasingly seeking high-quality buildings with modern amenities. Accommodating this demand would enhance the development's ability to attract and retain a diverse mix of employment uses.	The applicant acknowledges the City's comments regarding demand for larger employment spaces. Opportunities for future adaptation or consolidation of non-residential floor space can be explored as part of detailed design and as the market dictates, while maintaining the residential aspect of the current plan. Since the original submission, office units have been included within Phases 2, 4 and 5.
101.	During the informal public meeting, it was discussed that the owners of the Subject Land, IN8 Developments, is intending on extending their existing portfolio for Phase 1 by tapping into the purpose-built rental market with this project in response to current market conditions with the remaining phases to be determined at a later time. The anticipated timeline for complete build-out of all 5 phases was noted to be between 10-15 years. In thinking about the future needs and long-term economic viability of the City, as well as the immediate area, it is important to anticipate and be proactive in planning ahead ensuring that changing employment needs are met.	Acknowledged.
102.	In 2024, it was announced that the newest hospital to serve Waterloo Region will be located in the David Johnston Research + Technology Park, located within a kilometre of the Subject Lands with an anticipated opening date in 2034. Given this investment by the province, along with the anticipated ripple effects that this new hospital will have on the local economy and surrounding land uses, Economic Development would request that the applicant consider a different approach to mixed-use development for a portion or all of the proposed development with the inclusion of a higher amount of square footage intended for employment uses.	The applicant recognizes the significance of the planned hospital and its potential economic impacts. The proposed mixed-use framework provides flexibility to accommodate a range of employment and service-oriented uses over time while delivering much-needed housing in a highly accessible, transit-supportive location. Further, since the original submission, office units have been included within Phases 2, 4 and 5.
103.	This request comes from understanding that the demand for ancillary and support services in proximity to the hospital will increase drastically. Hospitals tend to create clusters of supporting uses such as: medical offices, supply-chain logistics, IT & data services and facilities management – many of these uses permitted through the Station Area Mixed-Use designation in OPA 58. The location of the Subject Lands, with its surrounding land uses and connectivity to public transit, and modern amenities will be an attractive	Acknowledged.
104.	In 2022, the City retained urbanMetrics inc. and Gladki Planning Associates to undertake a Commercial & Employment Area Policy Review (hereinafter referred to as the "Report"). The Report reviewed background data and existing policy, analyzed broader commercial and employment land trends, early impacts of COVID-19 and conducted outreach surveys to key stakeholders across the City.	Acknowledged.

105.	<p>The Report contains a significant amount of research and information that would be beneficial to review.</p> <ul style="list-style-type: none"> • Approximately 40,100 new jobs are forecasted in Waterloo to 2051 with the vast majority expected to be in office-based positions or population-serving roles. • Over 50% of the existing vacant employment land within the City is owned by the University of Waterloo and that these will develop according to advancing priorities and interests of the University, rather than traditional employment development, making it critical that floor space dedicated to employment uses in prime locations, such as the Subject Lands, are developed. • Land situated within the vicinity of the Research & Technology Station could be planned as intensive mixed-use areas including large office/employment components. Existing supply of employment lands cannot support the growth of employees projected by the Region due to the conditions/size/location of existing vacant sites, as such, the City will need to rely predominantly on intensification of sites near transit stations to accommodate the bulk of its future office employment. • Over 50% (20,500 jobs) of the Major Office Employment growth in the next 30 years is expected to be drive by growth in knowledge-based sectors as the Region continues to be a focal point for tech-focused innovation. Supporting uses such as light assembly relating to technology sectors are permitted in the site's designation, providing for employment opportunities and alleviating competition with industrial uses that can't be accommodated in typical office type space. • The Report suggests that the City is forecasted to continue experiencing a robust demand for employment land and that there is not sufficient supply to accommodate the forecasted growth and recommends that the City encourage more office/employment growth to occur surrounding LRT stations and in Uptown Waterloo. 	Acknowledged.
106.	<p>Economic Development is committed to supporting the long-term economic sustainability of the City by ensuring that sufficient land is preserved and designated for employment uses. The proposed development is situated within a Station Area along the ION transit corridor—an area identified for a significant concentration of office and employment uses as part of a broader vision for transit-oriented, mixed-use communities.</p>	Acknowledged.
107.	<p>Given the multi-phase nature of this development and the extended timeline for full build-out, Economic Development strongly encourages thoughtful consideration of how both the area and employment needs are expected to evolve over time. The long-term success of the Station Area Mixed-Use designation will depend on ensuring that all developments within these strategic areas include an appropriate proportion of non-residential uses. Doing so will help accommodate the growing demand for employment land and support the City's economic objectives through 2051 and beyond.</p>	Acknowledged.
PART M – PUBLIC COMMENTS		
108.	<p>Staff have received mixed comments from members of the public regarding the Applications and the proposed development. In general, their comments relate to the following themes:</p> <ol style="list-style-type: none"> a) Density b) Height c) Location d) Family units (i.e. 3-4 bedrooms) 	Acknowledged. See revised Planning Justification Report

PART N - EXTERNAL AGENCY COMMENTS		
Risk Management Office		
109.	The properties at 170 and 180 Columbia St W are not in a source protection area under the 2022 Grand River Source Protection Plan, and a Notice of Source Protection Plan Compliance (Section 59 Notice) is not required.	Acknowledged.
Waterloo Catholic District School Board		
110.	That any Education Development Charges shall be collected prior to the issuance of a building permit(s).	Acknowledged.
Other Comments		
111.	Comments from the following agencies have been received and are appended to this letter: <ul style="list-style-type: none"> • Canada Post • Enova Power • Six Nations • Region of Waterloo – comments outstanding relating to Environmental Noise and Rail Vibration. Future submissions to address comments when received. 	Acknowledged. See responses further below.
APPENDIX A – CANADA POST		
112.	Multi-unit buildings and complexes (residential and commercial) with a common lobby, common indoor or sheltered space, require a centralized lock box assembly which is to be provided by, installed by, and maintained by the developer/owner at the owner’s expense. Buildings with 100 units or more MUST have a rear loading Lock Box Assembly with dedicated secure mail room.	Acknowledged. Mail rooms provided.
APPENDIX B – ENOVA POWER		
113.	Existing System: Enova has overhead distribution lines on Columbia St W. Enova intends to maintain the overhead distribution system on all abutting streets. Modifications and/or expansions to Enova existing distribution system will likely be required. Enova will conduct an economic evaluation outlined in OEB Distribution System Code. Such expansion cost will be stated in an Economic Evaluation Agreement between Enova and the Customer and shall be signed by both parties prior to construction.	Acknowledged.
114.	Load Information: Customer’s load information such as a P.Eng. stamped single line diagram and load calculation must be submitted to Enova in order to determine the service size and supply method. For more information refer to the Conditions of Service available at enovapower.com .	Acknowledged.
115.	Technical Requirements: The applicant shall consult with Enova throughout the site plan review and design phases to ensure that all Enova servicing requirements are met. Enova will generally supply an overhead transformer if the service size is 400A or less. If a larger service size is required, the developer must make provisions for the installation of a pad mounted transformer or a transformer vault room and primary duct bank on private property. This requirement is evaluated on individual project basis. Refer to the Enova (Formerly Waterloo North Hydro) Technical Guidelines document for details [1].	Acknowledged.
116.	Transformer Location: The padmount transformer shall be installed such that any part of the transformer, when mounted, is a minimum of 3.0m from any buildings (including neighboring buildings) and with no obstacles, equipment, or structures, etc. within 2.0m of the concrete pad.	Acknowledged.
117.	Transformer grounding: The transformer vault grounding will be installing within a grassed area. The grounding grid cannot be installed under asphalt, curbs, concrete etc.	

118.	Easement: Enova will require an easement at no cost to Enova within the proposed development site for supporting, repair, restoration and maintenance Enova owned above ground and underground facilities. For example, a 6.2m x 6.8m easement for a Enova owned pad mount transformer; a 3m wide easement for any duct bank structures. Refer to the Enova (Formerly Waterloo North Hydro) Technical Guidelines document for details [1].	Acknowledged.
119.	Vault Room: If a transformer vault room is required for the service it must be constructed according to Enova (Formerly Waterloo North Hydro) vault room standards. Additionally, the vault room must meet all applicable requirements under the Ontario Building Code.	Acknowledged.
120.	Metering Room: The customer must provide a convenient and safe location satisfactory to Enova, for the installation of meters, wires and ancillary equipment. The location allocated by the customer for Enova metering shall provide direct access from outside for Enova staff unless otherwise agreed to by Enova.	Acknowledged.
121.	Set Back: The proposed building(s) must be set back a minimum of 5.0m from the pole line to allow for conductor swing as per the requirements of Ontario Building Code Section 3.1.19.	Acknowledged.
122.	Clearance: Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment) shall not be brought closer than 5 meters to an energized overhead conductor owned by Enova.	Acknowledged.
123.	Road Widening: Reference source not found. should review the pole locations in relation to any planned road widening. A larger building set back may be required to facilitate the relocation of Enova's poles.	Acknowledged.
124.	Grading: Any grading changes by the developer which will affect existing Enova facilities either on private property or municipal right of way shall be reviewed and approved by Enova prior to starting any site grading.	Acknowledged.
125.	Relocation of Facility: Any relocation of Enova facilities will be at the expense of the requesting party.	Acknowledged.
126.	Landscaping: The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the ESA Planting Under or Around Powerlines & Electrical Equipment guideline.	Acknowledged.
127.	Next Steps: A minimum of 12 months prior to the desired in-service date the Developer must submit a Service Request Form (available at enovapower.com) and provide the required information listed in the section 3 of the Service Connection Process [2] to Enova. Please note Enova requires a signed Offer to Connect (OTC) and the receipt of the payment for the service prior to procuring equipment.	Acknowledged.
APPENDIX C – SIX NATIONS		
128.	<u>Treaty Rights Compensation</u> As this development will essentially ensure that this land will never be returned to a natural state while consuming resources and emitting greenhouse gases, SNGREC requests that this development be paired with compensation for impacts to Six Nations Aboriginal and Treaty Rights and to the environment. SNGREC requests that these compensations come in the forms of affordable units, dedicated units for First Nations people, and environmental enhancements. Please reach out to lrust@sixnations.ca to plan a meeting to determine compensation.	Acknowledged.
129.	<u>Bird and Light Friendly Design</u> SNGREC requests that the building is designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, and directing light downwards.	Acknowledged. To be addressed at the detailed design stages.

	<p>SNGREC requests that balcony design avoids glass panes as these can appear as clear paths for birds to fly through.</p> <p>Please see the City of Toronto’s bird friendly practices for glass and for lighting as guidelines and implement them thoroughly across the entire design: https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf https://www.toronto.ca/wp-content/uploads/2018/03/8ff6-city-planning-bird-effective-lighting.pdf</p>	
130.	<p><u>Landscaping</u> SNGREC requests that only native plant species are used in landscaping efforts. Please provide SNGREC with a landscape plant list before procurement begins. SNGREC requests that the proponent uses Kayanase Plant Nursery for procurement of plants if Kayanase’s capacity allows.</p>	Plant list will be provided at Site Plan Application.
131.	<p><u>Commercial Space</u> SNGREC recommends increasing the amount of commercial space within this development. More easy access to commercial spaces means residents do not have to travel as far, which reduces traffic (and therefore emissions), improves human health, and saves money.</p>	Acknowledged. Additional ground floor retail/commercial space is provided.
APPENDIX D – REGION OF WATERLOO		
Water Services		
132.	<p>Regional staff have reviewed the ‘Functional Servicing and Stormwater Management Report IN8 Developments Inc., 170 & 180 Columbia Street West, Waterloo, Ontario’ prepared by Walter Fedy (April 18, 2025) including fire flow and find it acceptable.</p> <p>Columbia Street West has been identified in the Regional Transportation Capital Program (TCP) as project number 04082/04083 for water main replacement. It is currently scheduled for construction in 2026. Please contact Adelaide Batista at ABatista@regionofwaterloo.ca or +1 519 575 4100 x3585 for further information regarding service connections.</p> <p>The contact information for Regional Water Services is waterservicesdistributiondevelopment@regionofwaterloo.ca</p>	Acknowledged.
Environmental Noise and Rail Vibration		
133.	<p>Staff have received the report titled ‘170 Columbia Waterloo Incorporated, Transportation Noise and Vibration Assessment for 170 and 180 Columbia Street West, Waterloo, Ontario’ prepared by Dillon Consultant (April 2025).</p> <p>Please provide the signed Statutory Declaration/Owner’s Statement. Once the signed Statutory Declaration/Owner’s Statement is received, we will forward the Regional comments for the Transportation Noise and Vibration Assessment.</p>	Attached to the revised reports prepared by Dillon Consulting.
Grand River Transit		
134.	<p>The site is well served by multiple GRT routes serving stops at the Columbia/Phillip intersection, as well as at University of Waterloo Station which is within 800 metres of the subject site. As the site is well connected</p>	Acknowledged.

	to nearby stops with transit amenities, there are no transit infrastructure requirements as part of this development application.	
Transportation Impact Study		
135.	<p>Regional staff have reviewed the TIS specifically related to the potential signal at Access 2. The Region's recommended signal spacing is 215 m spacing between traffic signal. The distance from Laurel Trail to Access 2 is 155 m and Access 2 to Phillip is only 125 m. Further, we note that the TIS indicates the signal at Access 2 is not warranted. Regional staff do not support a signal at Access 2.</p> <p>Regional Transportation Planning is also reviewing the TIS, and further comments will be sent following their review.</p>	<p>Refer to Response Letter to Transportation Impact Study (TIS) is prepared by GHD dated January 22, 2026.</p> <p>Section 3 of the TIS Response Letter conducts the capacity analysis for Access 2 as a stop control intersection at Columbia St.</p> <p>Based on the analysis, the intersection of Access 2 and Columbia St is expected to operate at good Levels of services (LOS 'C' or better) with no critical v/c ratios (0.46 or less) and queuing issues (5 m or less) to report under the total traffic conditions.</p>
Housing		
136.	<p>The Region of Waterloo, as the Service System Manager for housing, is required by legislation to create a plan to address affordable housing and homelessness every 10 years for the geography which it covers. The plans are to outline current housing needs, develop objectives and targets related to meeting housing needs, and commit to actions that will be taken to meet these targets.</p> <p>Within this role, the Region of Waterloo establishes, administers, and funds housing and homelessness programs and services and operates housing directly.</p> <ul style="list-style-type: none"> • 10-Year Housing and Homelessness Plan for Waterloo Region contains an affordable housing target which is that 30% of all new residential development between 2019 and 2041 in Waterloo Region be affordable to low and moderate income households. • Our Building Better Futures Framework shows how the Region plans to create 3,500 units of housing affordable to people with low to moderate incomes by 2029. <p>The Region supports the provision of affordable housing. Should this development application move forward and all necessary applications be approved, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Provincial Planning Statement. Rent levels and house prices that are considered affordable according to the PPS are provided below in the section on</p>	Acknowledged.

<p>affordability. These are the levels for which developments will be eligible for Regional Development Charge exemptions.</p> <p>For affordable housing to fulfill its purpose of being affordable to those who require rents or purchase prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.</p> <p>Affordability in the City of Waterloo: According to the 2024 PPS the affordable house price is the lesser of the two house prices calculated as below:</p> <ul style="list-style-type: none"> • the price that is 10% below the average purchase price of a resale market unit; and • the price of a home for which payments would not exceed 30% of gross annual household income at the 60th percentile. <p>For an ownership unit of any dwelling type (i.e. single, semi, towns, apartment) to be deemed affordable, the proposed house price in the City of Waterloo must be at or below \$409,600. (Source: Provincial Bulletin posted June 2024)</p> <p>According to the 2024 Provincial Planning Statement 2024, the affordable rent is the lesser of the two rent values calculated as below:</p> <ul style="list-style-type: none"> • average market rent provided annually by the Canada Mortgage and Housing Corporation • rent which would not exceed 30% of gross annual renter household income at the 60th percentile. <p>For a rental unit to be deemed affordable, the rent for the proposed units in the City of Waterloo must be at or below:</p> <ul style="list-style-type: none"> • Studio \$1,360 • One Bedroom: \$1,552 • Two Bedroom: \$1,882 • Three+ Bedroom: \$2,050 <p>(Source: Provincial Bulletin posted June 2024)</p> <p>Staff further recommend meeting with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability. Please contact Judy Maan Miedema, Principal Planner at: JMaanMiedema@regionofwaterloo.ca or by phone at 226-753-9593.</p>	
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Waste Management

137.	The Region of Waterloo does not service stacked residential properties with more than 6 units. This site would not be eligible for the Region of Waterloo Residential Curbside Waste Collection Program. The owner/applicant is required to obtain private 3rd party waste removal services at the owner's expense.	Acknowledged.
Site Plan Requirements		
138.	Regional staff offer the following advisory comments in anticipation of future site plan applications. <ul style="list-style-type: none"> • Salt Management Plan • Stormwater Management and Site Grading • Waterloo Spur • Region of Waterloo International Airport • Transportation and Demand Management 	Acknowledged.
Salt Management Plan		
139.	The owner/developer is advised that they will be required to complete a Salt Management Plan to the satisfaction of the Region at Site Plan control. As part of the plan, the proponent is encouraged to incorporate design considerations with respect to salt management, including: <ul style="list-style-type: none"> • Ensure that cold weather stormwater flows are considered in the site design. Consideration should be given to minimize the transport of meltwater across the parking lots or driveway. This also has the potential to decrease the formation of ice and thereby the need for de-icing. • Directing downspouts towards pervious (i.e. grassy) surfaces to prevent runoff from freezing on parking lots and walkways • Locating snow storage areas on impervious (i.e. paved) surfaces in close proximity to catch basins. • Using winter maintenance contractors that are Smart About Salt™ certified. • Using alternative de-icers (e.g. pickled sand) in favour of road salt. The proponent is eligible for certification under the Smart About Salt™ program for this property. Completion of the Salt Management Plan is one part of the program. To learn more about the program and to find accredited contractors please refer to: http://www.smartaboutsalt.com/ . Benefits of designation under the program include cost savings through more efficient use of salt, safe winter conditions by preventing the formation of ice, and potential reductions in insurance premiums	Acknowledged.
Stormwater Management & Site Grading		
140.	Staff have received the report titled 'Functional Servicing & Stormwater Management Report for 170 and 180 Columbia Street West, Waterloo, Ontario' prepared by IN8 Development (April 18, 2025). Comments will be provided separately.	Acknowledged.
Waterloo Spur		
141.	Comments regarding the Waterloo Spur will be provided with the future Site Plan Application.	Acknowledged.
Regional Airport		
142.	The development is located within the proposed Airport Zoning Regulations with an allowable height of 1800ft (548m) ASL. The drawings indicated a maximum 41-storey building elevation of 471.28m ASL plus privacy screen. There is about 75m of height available above the building for any cranes, which is expected to be sufficient.	Acknowledged. To be provided at the Site Plan Application stage.

	<p>The developer will need to submit a Land Use application to Nav Canada for the buildings and cranes and obtain a letter of no objections to the satisfaction of the Region. The developer is encouraged to submit this as soon as possible to ensure there are no impacts for the proposal. The Region will require a letter of no objection at the site plan stage.</p> <p>The developer will also need to submit an Aeronautical Assessment Form to Transport Canada and comply with all requirements.</p>	
Transportation Demand Management		
<p>143.</p>	<p>The Region of Waterloo has endorsed the TransformWR Climate Action Plan for Waterloo Region strategy. The TransformWR strategy established a 30% GHG reduction target (based on 2010 levels) by 2030, and an 80% GHG reduction target to be achieved by 2050. Forty percent of the GHG emissions produced in Waterloo Region are related to fuel consumption from transportation.</p> <p>The TransformWR strategy:</p> <ul style="list-style-type: none"> • Establishes a goal to use sustainable transportation modes such as transit, cycling, walking, carsharing and carpooling, and • Establishes a strategy direction to seek ways to improve the efficiency of our transportation system and move the most people with the least amount of energy required <p>In light of the TransformWR strategy, Regional staff offer the following comments to encourage transit, cycling, walking, carsharing and carpooling at the proposed developments.</p>	<p>Acknowledged. The proposed development will feature bicycle parking and pedestrian connections to existing sidewalk infrastructure to encourage active transportation.</p>
<p>144.</p>	<p><u>Best practices to support cycling:</u></p> <ul style="list-style-type: none"> • Exterior paths should consider the movement of cyclists from the streets to the building entrances. Paths that cyclists are likely or encouraged to take should be an appropriate width and have reasonable curves. • Consider providing direct access from elevator lobbies / interior space to the bike parking rooms, permitting residents who are cycling the ability to get from their units to their bikes without needing to walk through the parking garage. • Considering using automatic doors (activated by keycard or similar) to the bike room, that the card readers/buttons/swept path of the door be arranged to ensure convenience for someone walking a bike, and that the doors be as wide as possible. Sliding doors are encouraged. • Some space in each room should be left without bike racks to support residents with non-conventional bike types (tricycles, trailers, cargo bikes, etc.) or children’s bikes. • Each secure bike room should have a bike fix-it station with stand, tools, and air pump. • Staff recommend that bike wash stations be located in or near the secure bike parking. A bike wash station can be as simple as a hose connection, hose, nozzle, drain, and bike stand. 	<p>Acknowledged. The proposed development will feature bicycle parking and pedestrian connections to existing sidewalk infrastructure to encourage active transportation.</p>

145.	<p><u>Best practices to support car share programs:</u></p> <ul style="list-style-type: none"> Implementing a car share program requires several centrally located and highly convenient parking spaces be reserved exclusively for the car share vehicles. Regional staff suggest the owner/applicant contact a car share program to inform the site design. The most established car sharing program in Waterloo Region is Communauto. Regional staff understand that company offers unique programming to “launch” a car share vehicle through a business agreement with the property owner. Contact Janet MacLeod jmacleod@communauto.ca to learn more about opportunities available locally. 	Acknowledged. Feasibility to be determined further in the approvals process.
146.	<p><u>Best Practices to Support Micromobility:</u></p> <ul style="list-style-type: none"> Please include parking pads to support potential future shared micromobility services on future site plan submissions. These can be as simple as designated space outside of clear walking paths for shared micromobility vehicles to park, however, more formal corrals or racks would help define the space and keep vehicles orderly. 	Acknowledged. Feasibility to be determined further in the approvals process.
147.	<p><u>Best Practices to support Transit Use:</u></p> <ul style="list-style-type: none"> For the information of the owner/applicant, GRT now has a GRT NextRide webpage at https://nextride.grt.ca/ showing customizable real-time departure information for nearby bus stops. The developer could consider having a screen in the lobby of each building to allow residents to check the time for the upcoming transit and remind residents as to the frequency of transit service within walking distance of the site. 	Acknowledged. Feasibility to be determined further in the approvals process.
Site Plan Fee		
148.	A Site Plan pre -consultation fee of \$300 and a Site Plan review fee of \$805 will be required for the review and approval of a future Site Plan application.	Acknowledged.
Regional Fees		
149.	<p>In accordance with the Region’s Fee and Charges By-law (24-052), the Region has received:</p> <ul style="list-style-type: none"> the Regional review fee of \$3,000 for Z-25-14 and OPA 66; and the Regional review fee of \$3,000 for Z-25-15 and OPA 67. <p>Any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charges By-law 19-037 or any successor thereof.</p>	Acknowledged.
Summary		
150.	<p>Prior to City Council considering OPA 67 and OPA 68 the Region requires:</p> <ul style="list-style-type: none"> Regional acceptance of the Environmental Noise Study; Regional acceptance of the Transportation Impact Study. 	Acknowledged.
Regional Transportation Impact Study Comments		
151.	Section 10.2 presents a pedestrian assessment, and Section 10.3 presents a cycling assessment. Both talk about existing infrastructure off-site. There is no discussion of pedestrian / cycle movements on site or how the site design will connect those users to the existing infrastructure on the periphery.	The site plan proposes sidewalks connecting each building’s entrances to the sidewalks along Columbia Street. There are bicycle racks also proposed for each building connecting to Columbia Street via Accesses 1 and 2.

	<p>The Applicant is providing substantially less parking than ITE recommends for this type of land use. And they do so by stating a lot of residents will use AT. The Applicant has not demonstrated how all these residents will get from their front doors to the AT network.</p> <p>This comment is offered for the City's consideration as site is accessed via a City road.</p>	<p>The residents, employees and visitors of the subject site development can easily connect to the City's active transportation network via sidewalks and bike lanes on Columbia Street, and Laurel Trail.</p>
152.	<p>The TIS states that the intersection of Access 2 and Columbia Street is proposed for future signalization. However, current Regional practice follows provincial guidelines developed by the MTO, which do not support the installation of unwarranted traffic signals. According to the guidelines, a second traffic signal is not recommended if the distance to an adjacent signal is less than 200 metres. The distance between Access 2 and the Laurel Trail crossing (future signalized) is approximately 155 metres, and the distance between Access 2 and Philip Street (currently signalized) is approximately 130 metres. Therefore, the Access 2 intersection does not meet the criteria for traffic signal installation.</p> <p>The Region requires the owner/applicant to address this comment. A traffic signal at Access 2 is not supported.</p>	<p>Refer to Response Letter to Transportation Impact Study (TIS) is prepared by GHD dated January 22, 2026.</p> <p>Section 3 of the TIS Response Letter conducts the capacity analysis for Access 2 as a stop control intersection at Columbia St.</p> <p>Based on the analysis, the intersection of Access 2 and Columbia St is expected to operate at good Levels of services (LOS 'C' or better) with no critical v/c ratios (0.46 or less) and queuing issues (5 m or less) to report under the total traffic conditions.</p>
153.	<p>Prior to City Council considering OPA 67 and Z-25-14 and OPA 68 and Z-25-15, the Region requires the TIS be revised to remove recommendations for the unwarranted signals at Access 2 and resubmitted for to the Region for approval.</p>	<p>See Response #152 above.</p>
APPENDIX E – Peer Review – Land Use Compatibility & Stationary Noise		
154.	<p>The report considers the following documents and guidelines for the assessment. We agree that these are relevant for assessing land use compatibility between industrial and sensitive land uses.</p> <ul style="list-style-type: none"> a) Provincial Planning Statement (2024) b) Environmental Protection Act c) Ministry of Environment, Conservation and Parks (MECP) D-Series Guidelines d) Ontario Regulation (O. Reg.) 419/05, Air Pollution - Local Air Quality e) MECP Noise Publication NPC-300. 	<p>Acknowledged.</p>
155.	<p>Section 3.1 discusses guidance from the Provincial Planning Statement (2024) with respect to ensuring compatibility between facilities in employment areas and sensitive land uses, and this section concludes with a reference to Halton Region and Oakville. An updated conclusion should be provided that discusses the proposed development in the City of Waterloo on lands currently zoned for employment uses (E2A).</p>	<p>Section 3.1 has been updated and now references City of Waterloo Official Plan.</p>

156.	In Section 4.1.3, please check the reference to Table 4 and update if necessary. Context suggests it should be Table 3.	Section 4.1.3 has been updated to reference Table 3
157.	The Summary of Industry Classifications in Section 4.1.3 identifies five (5) industrial facilities within the study area whose Potential Influence Area or Recommended Minimum Separation Distance intersects with the proposed development. These are summarized in Table 3. We agree with the classification of these identified facilities. The text indicates additional facilities were evaluated but were not included because they were beyond their Potential Influence Area distances from the proposed development. There is a tall stack (approximately 55 metres above grade) associated with University of Waterloo District Heating located at the Central Services Building, approximately 300 metres south-southeast of the proposed development. Although this is an institutional source of combustion emissions rather than an industrial source, NOx emissions from this source may impact elevated receptors at the proposed development. Please include discussion of this source and its potential impact on elevated receptors.	University Stack has been included in assessment – see Section 6.3.5
158.	The potential future use of the vacant land at 388 Phillip Street is discussed in Section 4.1.4 based on correspondence with the City regarding an application for minor variance to allow occupation of the existing facility by commercial recreation ancillary use. We agree that noise, vibration, and air quality impacts from the proposed future use of the vacant lands would not be expected to impact the proposed development. We also agree that further assessment of potential impacts would be required if the future use of the facility at 388 Phillip Street changed to include industrial use that is permitted under the current E2A zoning.	Acknowledged.
159.	Air dispersion modelling is used to identify sensitive receptors that may be impacted by industrial facilities and to provide an estimate of the frequency and severity of these impacts. We agree this is a reasonable approach.	Acknowledged.
160.	Based on the nature of operations at Napa AutoPro, Prica Orchard Inc., and the University of Waterloo office buildings, air quality impacts from these facilities were not expected at the proposed development. We agree with this assessment.	Acknowledged.
161.	HVAC equipment at 176 Columbia Street West, occupied by Columbia Data Vault, is not expected to have air quality impacts on the proposed development. We agree with this assessment.	Acknowledged.
162.	<p>The Columbia Data Vault data centre includes diesel-powered backup generators used as standby power sources, and we agree it is appropriate to confirm compliance with the MECP's Emergency Generator Checklist NOx screening level of 1,880 µg/m³ for a ½-hour averaging period.</p> <p>a) For clarity, please update the facility name that occurs in the last sentence of Section 6.3.3 from "Valley Blade" to "Columbia Data Vault".</p> <p>b) The source parameters for the diesel generator are provided in Table 13. Please discuss the sensitivity of the modelling results presented in Table 14 to different stack flow rates and exhaust temperatures, and the elevations at which the impacts are expected to be greatest. For example, the specification sheet for a Generac MD500 500kW generator indicates an exhaust flow of 112 m³/min and exhaust temperature of 550°C which may provide different dispersion results.</p> <p>c) The assumptions for dispersion modelling during generator testing are consistent with the operation and maintenance conditions in Certificate of Approval (CofA) 8333-6AQQBQ, specifically that only one of the diesel generator sets is tested at any one time. However, since the CofA was only for equipment</p>	<p>a) Last sentence of Section 6.3.3 has been updated</p> <p>b) Sensitivity of the modelling based on different generator stack flow rates and exhaust temperatures has been included in Section 6.3.3. Modelling results and elevations where impacts are expected to be the greatest are provided in Table 14</p>

	that may now be exempt under O.Reg.524/98 the CofA may no longer be valid, and the testing requirement may no longer be enforceable. Although it is reasonable to assume that a facility would only test one generator set at any one time, this is not guaranteed. Please discuss the potential impact if Columbia Data Vault tests more than one generator set at the same time, and any potential mitigation of these impacts.	
163.	The proposed development was determined to be within the Potential Influence Area of the Valley Blades facility, and a comparative air dispersion modelling assessment was made to evaluate potential impacts to new elevated receptors compared to impacts expected using the MECP's regulator receptor spacing. In the absence of detailed emissions information for the sources described in ECA 2038-CP5KY2, we agree with this approach.	Acknowledged.
164.	Please provide a comparison table for the dispersion modelling results showing the maximum predicted point of impingement (POI) concentrations for each contaminant included in Table 15 at the proposed development and the MECP grid of receptors, and the location (x, y, z) of the most impacted receptors. Since assumptions were made for some of the source parameters used in the modelling, such as stack flow rate and the modelling natural gas combustion equipment as a rooftop area source, please discuss the sensitivity of the results to changes in the assumed source parameters. For example, does modelling the natural gas combustion sources as a combined vertical stack have greater impact on elevated receptors at the proposed development?	Section 6.3.4 has been updated to include a comparison table (see Table 16). Sensitivity analysis of both an area and point source used to represent the natural gas combustion equipment has been included in Section 6.3.4
165.	Fugitive dust from the Valley Blades facility was not expected to have significant impact at the proposed development. We agree with the rationale used in the assessment of fugitive dust and with this conclusion.	Acknowledged.
166.	Nuisance impacts from odour were assessed by scaling emission rates from paint booth exhaust stacks to achieve a modelled odour concentration of one odour unit (OU) at the nearest existing sensitive receptor (Bright Starts Co-operative Early Learning Centre daycare at 200 Columbia Street West). Using these same modelled emission rates the odour intensity and frequency were then determined at sensitive receptors at the proposed development. The results of this analysis suggest a slight increase in odour intensity and frequency of exceedance of 1 OU at the proposed development compared to the nearest existing sensitive receptor. Mitigation measures to reduce potential for odour exposure are suggested in Section 6.4. We agree with the approach, and the rationale and steps described are reasonable. The mitigation recommendations are also reasonable from the perspective of reducing odour exposure from the Valley Blades facility, but details of these mitigation recommendations should be adjusted if necessary following assessment of potential impacts from emissions from the Central Services Building stack noted in item #4 in this review.	An update to the mitigation recommendation was not required based on the assessment of the Central Services Building exhaust stack (Section 6.3.5).
167.	Please include figures showing the location of receptors and the location of the described sources in Tables 14 and 15 that were used in the air dispersion modelling assessments described in Sections 6.3.3 and 6.3.4.	See Figures 6, 7, 8 of the updated Figures section
168.	Please ensure details of all references are provided in the References section. For example, (Kassel, 2009) is cited as the source for correlation of odour unit with intensity of odour but is not included in the References section.	References Section has been updated to include (Kassel, 2009) reference
APPENDIX F – Peer Review – Noise & Vibration		

169.	The report presents the noise and vibration impacts from road traffic on Columbia Street West and Phillip Street, as well as from freight and light rail pass-bys on the Waterloo Central Railway Guelph Spur Line. We concur that these represent all relevant transportation noise and vibration sources that need to be considered.	Acknowledged.
170.	The report uses the NPC-300 guideline for assessment of the transportation noise, and Guidelines for New Development in Proximity to Railway Operations (FCM/RAC, 2013) for the assessment of transportation vibration. We concur that this is the current practice in the City. However, any future studies or update of the report should refer to the City of Waterloo Terms of Reference (TOR) for noise studies and ensure the assessment fulfills all requirements. Region of Waterloo noise guidelines should also be referenced and considered.	Reference to the City of Waterloo Terms of Reference (TOR) for noise and vibration studies was added to the updated study. See Section 2.2.
171.	There are inconsistencies in the assessment with respect to the freight train modelling. The email in Appendix B outlining the correspondence with Waterloo Central Railway indicates one train per night with two locomotive and 12 railcars. However, Section 2.1.2.1 of the report references two trains per night with five locomotives per train. Finally, the sample calculations provided utilizes on train per night with one locomotive and 4 cars as inputs. The assessment should be revised using rail traffic input data from the rail operator and modelling updated to reflect the correct inputs.	Region of Waterloo noise guidelines was also referenced.
172.	Rail traffic volumes were indicated to be grown using a 2.5% growth as appropriate however given the inconsistency with rail inputs it is not possible to verify if this was completed.	The assessment was revised using rail traffic input data from the rail operator and modelling parameters were also updated to reflect the correct inputs. Sample calculations updated, included in Appendix E.
173.	The road traffic data was appropriately obtained from the Region of Waterloo.	Acknowledged.
174.	The USA Transportation Noise Model (TNM) roadway algorithms and the Federal Transit Administration/Federal Railroad Administration (FTA/FRA) railway algorithms, as implemented in the commercial noise modeling software Cadna/A, were used to predict roadway and railway noise impacts on the proposed development.	Acknowledged.
175.	A sample STAMSON calculation is provided in Appendix C of the report to validate the use of Cadna/A and its associated algorithms. However, the time period and the rail and road traffic data were not correctly input in the STAMSON sample calculation. STAMSON sample calculation should be corrected before it can be considered a valid verification of the Cadna/A model.	STAMSON sample calculation was corrected and included in Appendix E. Comparison with Cadna/A result was illustrated in Table 12.
176.	Noise levels were evaluated at the facades of all towers to determine the worst-case impact, which is an appropriate approach. For Outdoor Living Areas (OLAs), the assessment included common amenity spaces on the rooftops of the towers and private balconies at the terrace level. It is important to note that the assessment of private balconies is not mandatory, as they are not the sole outdoor living area for occupants, and some of them have a depth of less than 4 meters, which would exclude them per NPC-300.	Acknowledged.
177.	The report identifies exceedances of regulatory noise limits based on the predicted noise levels. We concur with the exceedances identified.	Acknowledged.

178.	The report specifies the facades where enhanced building component design is required. We agree with the identified facades.	Acknowledged.
179.	The report specifies only the required window STC ratings for the facades where enhanced building component design is needed. However, the STC requirements for exterior wall assemblies should also be provided.	Requirements for exterior wall assemblies were included in Table 10.
180.	“Maximum Required Glazing (STC)” in Table 10 should be changed to “Minimum Required Glazing (STC)”.	The text “Minimum Required Glazing (STC)” has been updated in Table 10.
181.	Ventilation and warning clause type recommendations are provided based on the predicted sound levels. We concur with the recommendations provided.	Acknowledged.
182.	The report recommends 1.5-meter-tall noise barriers to reduce noise levels at the terrace Outdoor Living Area (OLA) to below 55 dBA.	Acknowledged.
183.	On-site measurements were conducted to assess ground-borne vibration resulting from train pass-bys. The measurement location was approximately 2 meters from the rail right-of-way and included observations of six light rail transit (LRT) pass-bys. The recorded root mean square (RMS) particle velocity values were below the applicable regulatory limits. However, ground-borne vibration from LRT pass-bys does not represent the vibration levels generated by freight train pass-bys. Ground-borne vibration measurements during freight train operations must also be conducted.	As the Waterloo Central Railway (WCR) operates the subject rail line (in proximity of the Proposed Development) as a spur line, a rail vibration assessment is not required. See Section 2.4 for detail.
184.	The report is missing both the consultant and owner declaration statements, which are required for submission per Region of Waterloo guidelines.	The consultant and owner declaration statements have been provided with the revised reports.
185.	The stationary noise assessment was completed within the Land Use Compatibility Assessment report prepared by Dillon Consulting dated April 2025.	Acknowledged.
186.	The assessment does not reference or adhere to the City of Waterloo’s Terms of Reference for Noise Studies. An updated assessment should explicitly reference the ToR and demonstrate compliance with all its requirements.	Section 3.6 has been updated and now references City of Waterloo’s ToR.
187.	A review of the stationary noise sources included in the assessment was completed. The following is noted: a) Potential sources of stationary noise considered in the Noise Study were identified based on aerial imagery and during site visits within the area on March 11, 2025. b) Identified significant industries include: i. Napa Auto Pro ii. Prica Orchard Inc. and The University of Waterloo Office buildings iii. Columbia Data Vault, Ford RnD Centre iv. Valley Blades Limited	Acknowledged.
188.	The stationary source assessment does not include all sources with the potential to impact the proposed development. a) The University of Waterloo (UW) main campus site has not been included in the assessment and justification for the omission has not been provided. The central services building for the campus is located within the 300m buffer and should be considered along with any other sources located at UW.	a): Justification has been added in Section 4.1.5. b): Modelling has been adjusted to include all five UW East Campus buildings and associated stationary sources, see Section 5.2.

	<p>The assessment should be updated to confirm that the introduction of the proposed development does not adversely impact the environmental permitting for UW.</p> <p>b) The modelling considers two of the five UW East Campus buildings. Justification for the omission of the other three buildings has not been provided. Modelling should be updated or justification provided as to why these buildings were not included in the assessment as there are sources with similar setbacks to the subject site.</p> <p>c) Noise sources associated with the University of Waterloo School of Optometry and Vision Science have not been included in the assessment. For example, there are cooling towers on the roof of this building located less than 200m from the proposed development.</p>	<p>c): Justification has been added in Section 4.1.6.</p>
<p>189.</p>	<p>Representative sound level data for the modelled equipment appears to be taken from Dillon's sound database. The levels used are acceptable.</p>	<p>Acknowledged.</p>
<p>190.</p>	<p>The global ground absorption value of 0.4 is not representative of the area and should be updated. A global value of 0.2 or less would be representative given that the area between the residential buildings and the dominant stationary sources is primarily hard surfaces. Local area of ground absorption can be used to capture impacts from the green spaces near the University of Waterloo.</p>	<p>A global ground absorption value of 0.3 has been adjusted in the model, which is the standard approach representing hard surfaces, i.e. asphalt pavement. See Section 5.4.1.2.</p>
<p>191.</p>	<p>HVAC duty cycling of 100% during the daytime (assumed to include evening) and 50% during the night-time is acceptable.</p>	<p>Acknowledged.</p>
<p>192.</p>	<p>The cumulative impact of all surrounding stationary noise sources was not evaluated, as required by the City's ToR. The study should be revised to assess the combined noise levels from all relevant sources in the vicinity of the site.</p>	<p>The cumulative impact of all surrounding stationary noise sources has been added to Section 5.4. See Table 7 for the predicted results.</p>
<p>193.</p>	<p>The report proposed that noise impacts from stationary sources surrounding the proposed development be assessed to Class 4 limits. However, discussion of required mitigation for compliance with Class 1 limits or the justification for the recommendation of Class 4 has not been provided. A technical and economic justification based on mitigation to Class 1 sound level limits is needed to consider it infeasible. The City requires this justification before petitions for a Class 4 designation will be considered. Please see the City Terms of Reference for further information.</p> <p>a) NPC-300 (Section B11) highly recommends communication with the stationary source owner and discussion of potential alternatives where mitigation is necessary. The City supports this direction of NPC 300 to ensure land use conflicts are minimized. This information should be included in the report.</p> <p>b) Discussion regarding the feasibility of reconfiguring the site or utilizing blank walls to reduce mitigation requirements should be included and assessed as appropriate.</p> <p>c) Modelling shows that mitigation is required to achieve compliance with the elevated Class 4 limits. The development would require a 6.8 m barrier along with the Class 4 designation to comply with the 60 dBA daytime limit. This barrier height is significant. Further, the modelling needs to be updated to account for the noise sources not included in the assessment as noted above. Also, a cumulative assessment for all noise sources along with sample calculations and results figures are required to determine if the presented mitigation solution is acceptable. Given the mitigation proposed and updates</p>	<p>Justifications to Class 4 designation and infeasibility to mitigate to Class 1 sound level limits have been added to Sections 5.4 and 5.4.1.3 . A cumulative assessment for all noise sources has been added to Section 5.4. See Table 7.</p>

	required that are likely to increase predicted sound levels, the feasibility of the development must be considered questionable based on the available information.	
194.	The report is missing both the consultant and owner declaration statements, which are required for submission per Region of Waterloo noise guidelines.	The consultant and owner declaration statements have been provided with the revised reports.