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Planning Approvals, Integrated Planning and Public Works

City of Waterloo

100 Regina Street South

Waterloo, ON N2J 4A8

**RE: Resubmission of Materials for Zoning By-law Amendment (Z-25-23)  
167-171 King Street South, Waterloo  
OUR FILE 15202B**

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On behalf of our client, VanMar Developments 171 King GP Corp., MHBC Planning Ltd. is pleased to provide updated reports and materials in support of a formal resubmission for the above-noted planning application for the lands municipally addressed as 167-171 King Street South, in the City of Waterloo (hereinafter referred to as the "subject lands").

This formal resubmission is intended to address post-circulation comments from the City, Region and agencies in support of a mixed-use multi-tower development on the subject lands. This resubmission is further supported by comment response tables, which provide detailed responses to the post-circulation comments for ease of review.

### **Summary of Revisions to Concept Plan**

Following receipt of the formal post-circulation comments received from agencies and municipal staff, as well as comments heard from the public, our client has reviewed and made revisions to the original conceptual site plan in an effort to address a number of the key concerns/comments that were raised by City staff and the public.

The following is a summary of the main design changes to the proposed development, as well as the resulting changes to the building statistics:

#### Design Changes

- 'Swapped' tower heights to make the King Street tower (Tower B) the taller of the two proposed towers.
- Reduced average tower heights to 34 storeys (previously 35 storeys). Tower A is now 30 storeys, and Tower B is 38 storeys.



- Reduced density.
- Removed encroachment into Regional right-of-way for Levels 3-5 along King Street frontage.
- Added delineation of common outdoor area along King Street frontage to meet Zoning By-law requirements.
- Added mid-block walkway connection from Caroline Street to Kuntz Lane/King Street along the western property line.
- Increased commercial floor area along King Street.
- Provision of additional bicycle parking spaces to meet Zoning By-law requirements.
- Further expanded unit mix to add 3-bedroom units.

### Revisions to Key Site and Building Statistics as a Result of Design Changes

The below table compares the original proposal with the revised development concept in terms of key building and site stats:

|                                                      | <b>August 2025 Submission</b> | <b>Revised Plan (April 2026)</b> |
|------------------------------------------------------|-------------------------------|----------------------------------|
| Building Height (Tower A)<br>"Caroline Street Tower" | 37 storeys<br>122.35 metres   | 30 storeys<br>102.73 metres      |
| Building Height (Tower B)<br>"King Street Tower"     | 33 storeys<br>112.9 metres    | 38 storeys<br>132.4 metres       |
| Density (Bdrms per Hectare)*                         | 2,250                         | 1,950                            |
| Number of Units                                      | 834                           | 802                              |
| Vehicle Parking Spaces                               | 428                           | 400                              |
| Bicycle Parking Spaces                               | 259                           | 499                              |
| Commercial Floor Area**                              | 790.68 m <sup>2</sup>         | 815.85 m <sup>2</sup>            |
| Common Outdoor Area                                  | Not identified                | 225 m <sup>2</sup>               |

*\*Illustrates density requested in Zoning By-law Amendment (additional density requested to allow flexibility in final unit mix).*

### **Resubmission Materials and Revised Technical Reports/Plans**

In addition to this cover letter, the following materials/updated reports have been included with this resubmission to reflect the updated conceptual site plan, and to address specific comments from the post-circulation comment package, where applicable:

- Comment Response Matrix, addressing all comments except heritage comments;

- Comment Response Matrix, addressing heritage specific comments;
- Response Letter to Public Comments following developer-led Neighbourhood Meeting, dated and circulated December 23, 2025;
- Planning Addendum Letter Report, prepared by MHBC;
- A 'redline' version of the proposed draft Zoning By-law Amendment;
- A 'clean' version of the proposed draft Zoning By-law Amendment;
- Revised Architectural Design Package, including updated Sun/Shadow Study, prepared by Kirkor Architects;
- Revised Heritage Impact Assessment, prepared by MHBC Planning;
- Revised Functional Servicing and Stormwater Management Report, prepared by WalterFedy;
- Updated Preliminary Civil Engineering Plans, prepared by WalterFedy;
- Updated Noise Impact Study, prepared by GHD;
- Response Letter to Peer Review Comments on Noise Impact Study, prepared by GHD;
- Section 59 Notice; and,
- Updated Pedestrian Wind Tunnel Study, prepared by Gnobi Consulting Inc.

## Summary

We look forward to working with Staff such that this application can be brought forward to Council for a decision at the earliest available opportunity. We would be pleased to meet with Staff to review the revised development proposal and the updated Zoning By-law Amendment proposed as part of this resubmission.

Yours truly,

## MHBC



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cc. *Paul Leveck*  
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