Victoria Common First Submission Comment Response Matrix
Official Plan and Zoning By-law Amendment
City File No: OPA25/001/V/AP & ZBA25/002/V/AP

Comment	Response
Development and Housing Approvals, Andrew Pinnell **andrew.pinnell@kitchener.ca, 519-783-8915**	
Through the Official Plan Amendment (OPA) Application, DHA staff understands that the owner is requesting to retain the Medium Rise Residential land use designation and amend Policy 15.D.12.23 [policy associated with Specific Policy Area 23 – St Leger St (1 Adam St)] to "permit a maximum FSR of 5.21 within the subject lands and a maximum height of 110 metres and 35 storeys". *If the requested OPA is different than noted above, the applicant should advise staff immediately.*	The proposed development has been revised to stay within the maximum 4.0 FSR. The OPA will still be required for maximum height. Refer to the cover letter for additional information.
Through the Zoning By-law Amendment (ZBA) Application, DHA staff understands that the owner is requesting to retain the RES-6 zoning and modify Site Specific Provision (323) for the Subject Area only (i.e., the vacant portion of Block 9, 30T-11203) to permit: o The site specific provision applies to the subject lands, regardless of lot configuration; o A lot is permitted without frontage on a public street; o A maximum FSR of 5.21; o A maximum height of: • 102 metres and 33 storeys for Building C; • 66 metres and 21 storeys for Building D; • 110 metres and 35 storeys for Building E; o The minimum required parking rate is 0.66 spaces per unit plus 0.1 visitor spaces per unit. *If the requested ZBA is different than noted above, the applicant should advise staff immediately.*	The proposed development has been revised to stay within the maximum 4.0 FSR. The other amendments listed are still relevant, though the requested heights have been modified. Please refer to the cover letter for additional information.
Development proposed for the subject lands should be reviewed in the context of the original vision for the site, as outlined in the original development concept. Any deviations should be consistent with the original intent.	The original vision of the site is maintained through compliance with the maximum density and maintaining core components of the original concept (i.e. linear park, Block 9 being the location for increased height

Comment	Response
	and density). While the heights are proposed to increase, podiums below the current maximum permitted height are proposed and will create a similar streetscape as the original proposal. The proposed increased height will facilitate increased at grade landscaping and amenity space over the original proposal.
The site is identified as Community Areas on Map 2 – Urban Structure. The site is not a Protected Major Transit Station Area (PMTSA) or other type of Intensification Area. Per Policy 3.C.2.52 (Community Areas policy), "limited intensification may be permitted within Community Areas". Additionally, "proposed development must be sensitive to and compatible with the character, form and planned function of the surrounding context". Staff is concerned that the proposal (i.e., 21, 33, and 35 storey buildings) does not conform to the Community Areas Urban Structure Component, since it does not represent "limited intensification" and is not "sensitive to and compatible with" the adjacent development (e.g., 3-storey townhouses).	The proposed development has been revised to comply with the maximum permitted density and to reduce height. While the proposed development continues to require amendments for height, multiple studies (wind, shadow, noise, traffic, parking) and design components (podiums, building articulation) demonstrate that the proposed buildings will be compatible with the surrounding residential neighbourhoods.

Comment	Response
The proposal is inconsistent with the 'stock' Medium Rise Residential designation, as outlined in policies 15.D.3.18 and 15.D.3.19, having a building height more than 4 times the maximum permitted height (max 8 storeys / 25 metres permitted versus 35 storeys / 110 metres proposed) and an FSR more than 2.5 times the maximum permitted FSR (max 2.0 FSR permitted versus 5.21 FSR proposed). Even if the height and massing were supportable, Medium Rise Residential would not be an appropriate land use designation. Also, the proposal is inconsistent with the Specific Policy, having a building height nearly 3 times the permitted maximum (max 36 metres permitted versus 110 metres proposed) and an FSR 30% greater than the permitted maximum (max 4.0 FSR permitted versus 5.21 FSR proposed). In fact, the proposal exceeds the limitations of the High Rise Residential land use designation, with an FSR of 5.21, whereas the HRR designation permits a maximum FSR of 4.0 (see Policy 15.D.3.24).	The proposal has been revised to comply with the Specific Policy's maximum density, both for the Block and Victoria Common overall. The proposed heights have also been decreased.
Staff is concerned that the proposed high density multiple residential development will not successfully integrate within the surrounding Medium Rise Residential designation, per Policy 15.D.3.3. The applicant should review the Urban Design Policies in Section 11 and revise the proposal accordingly. Per said policy, "An emphasis will be placed on: a) compatibility of building form with respect to massing, scale, design; b) the relationship of housing to adjacent buildings, streets and exterior areas; c) adequate and appropriate parking areas are provided on site; and, d) adequate and appropriate amenity areas and landscaped areas are provided on site."	The proposed development has been revised to comply with the maximum permitted density and to reduce height. While the proposed development continues to require amendments for height, multiple studies (wind, shadow, noise, traffic, parking) and design components (podiums, building articulation) demonstrate that the proposed buildings will be compatible with the surrounding residential neighbourhoods. The proposed increase in height will facilitate additional landscaped area and outdoor amenity areas by reducing the

Comment	Response
	ground floor area of the towers.
Staff has similar concerns that the height of the proposed development is not compatible with and does not "respect the massing, scale, design and physical character of the established neighbourhood…", per Policy 15.D.3.4.	See above. The requested heights have been reduced.
Conformity with policies 4.C.1.9 (Housing), 11.C.1.33 (Urban Design), and 11.C.1.34 (Urban Design) is also in question.	Policy responses to 4.C.1.9 were provided in the Planning Justification Report, while 11.C.1.33 is addressed in the Urban Design Brief. While not specifically addressed, the criteria of Section 11.C.1.34 are addressed in the Urban Design Brief, which addresses the Tall Building Guidelines.
The requested Zoning By-law Amendment would retain the Medium Rise Residential (RES-6) Zone and amend the Site Specific Provision. However, Section 7 of Zoning By-law 2019-051 states that "the purpose of this zone is to accommodate medium density dwelling types and some complementary non-residential uses in medium rise residential areas." The proposal is not consistent with medium density dwelling types. The proposal should be revised and the zoning request modified to achieve the medium density development intended through the original approvals.	The Zoning By-law Amendment will be amended to RES-7. Further discussion can occur relative to the Official Plan designation to match the zoning provision.
In this regard, the proposed building heights and massing should be significantly reduced to achieve the policies of the Official Plan and the intent of the Council-adopted Urban Design Brief. Moreover, the Planning Justification Report should be revised to respond in greater detail to the above noted Official Plan policies.	The proposed development has been revised to comply with the maximum permitted density and to reduce height. While the proposed development continues to require amendments for height, multiple studies (wind, shadow, noise, traffic, parking) and design components (podiums,

Comment	Response
	building articulation) demonstrate that the proposed buildings will be compatible with the surrounding residential neighbourhoods. The proposed increase in height will facilitate additional landscaped area and outdoor amenity areas by reducing the ground floor area of the towers.
The applicant must define / clarify the Subject Area for this OPA/ZBA, for the purposes of accuracy for the legal amendments, calculating FSR, and otherwise. Currently, what the Subject Area is and should be are not clear.	The Subject Area is shown on the accompanying architectural plans, and now reflects that the parking area at the end of Victoria Marie Court is not subject to the applications. As such, the Subject Area now fully reflects the limits of Plan 58R-22222.
The Planning Justification Report refers to the Subject Area being the "vacant portion of Block 9", Draft Plan of Subdivision 30T-11203. This is understandable since when referring to FSR calculations, Site Specific Provision (323) references this subdivision block. However, another section of the PJR seems to indicate that SSP (323) will be affected, which inherently applies to the whole of the subdivision block. Also, the application forms state that the Subject Area is "Parts 1, 2, 3, 4, and 5 on Reference Plan 58R-22222." However, these reference plan parts do not seem to correspond directly to the Subject area shown in the plans provided in the PJR and Architectural Plans.	See above regarding subject area. SSP 323 applies to the Subject Area and developed portions of Block 9. The existing development in Block 9 has been accounted for in the FSR calculations.

Comment	Response
In addition, a modification to Draft Plan of Subdivision 30T-11203 on April 18, 2013 changed the numbering of Block 9 to Block 4, and slightly changed the size (from 1.97 ha to approx. 1.93 ha) and shape. The Registered Plan of Subdivision 58M-561, dated October 8, 2013, aligned with the aforementioned subdivision modification, numbering the block in question as Block 4, 58M-561. It should be noted that the current FSR requirement outlined in Site Specific Provision (323) applies to the whole of Block 4, 58M-561.	The existing development in Block4 has been accounted for in the FSR calculations (refer to PJR).
It is also noted that other planning applications since the registration of the subdivision may affect the subject proposal / Subject Area. For example, the PJR states that "Consent Application B2018-122 separated the 'subject lands' from Buildings A and B (not registered)". Staff requests that the applicant confirm whether this Consent has been finalized and the lot created. Also, staff understands that a portion of Block 4, 58M-561 is now subject to WCP 656 and WCP 668. How do these affect the subject proposal / Subject Area?	The Subject Lands exclude Buildings A and B (WCP 656 and 668), and the FSR for these buildings has been accounted for in the permissions (refer to Table 4 in the PJR).
The requested ZBA represents an opportunity to resolve any existing zoning / boundary inconsistencies. In this regard, staff requests that the applicant review the information and documents referenced above and confirm/define the Subject Area for both the OPA and ZBA.	The Subject Area is shown on the accompanying architectural plans, and now reflects that the parking area at the end of Victoria Marie Court is not subject to the applications. As such, the Subject Area now fully reflects the limits of Plan 58R-22222.
This area does not have a significant amount of commercial uses immediately nearby, and the proposal would add a significant number of residents that will need such services for daily life. Per 15.D.3.20, staff strongly encourages the applicant to provide complementary non-residential uses, particularly neighbourhood commercial uses, in the bases of the proposed buildings.	Commercial areas have been added into the ground floor of each of the proposed buildings, facing the public realm (refer to Plan A2.5).

Comment	Response
Ownership: It appears some of the original developer representatives are involved in the current applications. How does i2 Developments relate to the original developers (i.e., 1841362 Ontario Inc / Queensgate)?	The landowners at i2 Developments were formerly partners with the landowners at 1841362 Ontario Inc / Queensgate, and are now sole owners after having purchased the lands.
What is the plan for the Sales Centre at 310 Louisa Street? What role will this property play in the proposed development?	The sales office is going through renovations and will continue to act as the sales office for Buildings C, D, and E.
The subject site is located on private, condominium roads that have access to St. Leger St, which does not have a transit route and is classified as a Minor Neighbourhood Collector Street in the Official Plan. The site does not have direct access to Margaret Street, which has the closest transit route. This is not ideal for the scale and unit density of the proposed development concept. Can a path to the transit route on Margaret Street be achieved via Adam Street and the abutting New Apostolic Church's parking lot? Staff would happily attend any meetings the applicant schedules with the Church to try to facilitate such a connection.	The project team is happy to discuss potential options for pathways with adjacent landowners, however, there are no plans in place at the moment for such connections.

Comment	Response
The community and staff share a concern regarding construction traffic and access, particularly if the proposed final phase of this development will itself be phased to achieve build-out over many years. This concern should be resolved early in the process. Using the existing condominium roads for a multi-year construction project may cause undue hardship for the current residents of Victoria Common. Accordingly, staff request that the applicant pursue alternatives, such as gaining access to Margaret Avenue, via Adam Street and the New Apostolic Church lands. Any such access options would require agreement from and discussions with the Church: 1. A 'straight run' from Margaret Avenue, down Adam Street, across the easterly Church parking lot, through to Victoria Marie Court. Note that this option would require resolution of grade changes and stormwater infrastructure conflicts; 2. A route from Margaret Avenue, down Adam Street, a left turn through the easterly Church parking lot, through to the approximate location of Building E. This may alleviate grading and stormwater infrastructure challenges, but may be less palatable to the Church since it would involve a larger portion of their parking lot. Another option may be to gain access to the Subject Area via 310 Louisa Street. However, the width at the rear appears to be deficient. Additional land may be temporarily required from a portion of Oscar Lauber Park. However, justification and permission from Parks Division would be required. This issue of construction traffic and access must be resolved in consultation with Steven Ryder, Traffic Project Coordinator (Transportation Services; 519-783-8968; steven.ryder@kitchener.ca).	Since the comments were provided we have discussed multiple options for construction access. It is understood that the City will not support an access from Louisa Street. Accordingly, the construction vehicles will access the site from Victoria Marie Court and Prince Albert Boulevard (existing easements are in place). The linear park will form the main staging area. A Construction Management Plan has been provided with the enclosed materials, to be finalized during Site Plan Approval.

Comment	Response
Easements are essential to the proper functioning of any proposal for the Subject Area because it depends on access to facilities on abutting properties that are in separate ownership. Please provide drawings / plans that clearly show the existing and proposed easements for the parking garage, access, amenity areas, SWM, services, etc. Several plans may be necessary to show all easements.	An updated easement plan is included with the submission package.
Do the required easements for access, parking garage, etc. require agreement from the existing condominium corporations? If so, have these corporations provided their agreement? If not, how will this agreement be acquired?	All required easements are in place.
Page 13 of the PJR states, "Victoria Square, in front of Building E, will be funded and maintained by the condominium corporation associated with Building E but accessible to all residents of Victoria Common. The linear park will be funded and maintained by the five condominium corporations of Block 9 (representing Buildings A – E) as well as the surrounding townhouses. The courtyard between Buildings A – D will be funded and maintained by the condominium corporations associated with Buildings A – D in accordance with the Easement and Cost Sharing agreement which also addressed the shared underground parking garage between Buildings A – D." How will this work? Are there clauses in the declarations of the existing condominiums that outline cost and maintenance obligations for the future outdoor amenity spaces and parking? Is the cost-sharing agreement already in-place (if, so please provide the Easement and Cost Sharing Agreement referenced on Page 22 of the PJR)?	Cost-sharing agreements are in place. The condominiums contemplate the creation of Buildings C, D, and E, and the declarations of condominium corporations for Buildings C, D, and E will reflect the same.

Comment	Response
The registered subdivision agreement must be revised / updated regarding the number of units and all related clauses, because the current subdivision agreement states that the subject subdivision block has a maximum unit allocation of only 677 units, and the subdivision has an overall allocation of only 897 units. Staff is currently considering the timing for when this revision should occur (e.g., as part of the future Condominium Application review / conditions).	Noted.
The PJR refers to a "linear park". However, DHA staff suggests not using this terminology, because it could be construed to be a public park. This "park" could perhaps instead be referred to as a "central amenity space" or "linear amenity space".	Noted – this distinction will be made clear during the public meeting.
Note that the central amenity space should be constructed without further delay. If this final phase of the development will itself be phased to achieve build-out over many years, the central amenity space should be constructed in the first phase, noting that residents of Victoria Common have been waiting for this amenity for more than a decade.	The central amenity space will be required for construction lay-down and access for all three remaining phases.
How will the extension of the central amenity space to Oscar Lauber Park be completed, as shown in the Architectural Plans? Note that there is a missing link that is not owned by i2 Developments (i.e., the parking lot at the end of Victoria Marie Court appears to be blocking the potential connection).	The plans have been revised to identify that the parking area at the end of Victoria Marie Court will remain. Thank you for bringing this to our attention.
At this time, DHA staff is waiting for review comments regarding the noise study and land use compatibility matters from our consultant, RWDI. These comments will be forwarded when available. Among other matters, the determination of whether the proposed development should be assessed as Class 1 or Class 4, for noise purposes, must be made.	Please refer to updated studies.

Comment	Response
The "as-of-right" shadows and angular plane diagrams in the Architectural Plans appear to all be based on the 36-metre maximum building height requirement in the current zoning. However, these diagrams should instead be based rather on 8-storey building forms for those buildings generally located where Buildings C and D are located in the current concept, as outlined in the Council-adopted Urban Design Brief, dated May 25, 2012. Staff requests that the applicant update the drawings, accordingly, as part of a resubmission package.	Shadows updated to show 8 storey buildings.
DHA staff requests that the applicant prepare and submit a revised proposal for review, that addresses the above comments and other department and agency comments. Staff also requests a response to these and other department and agency comments, in the form of a response matrix. Following receipt and review of these materials, staff will schedule a second community engagement meeting.	Included as part of resubmission package. Note that a second NIM was held on September 16, 2025.
Urban Design – Pegah Fahimian pegah.fahimian@kitchener.ca, 519-783-8911	
The proposed Towers D and E do not appear to meet the design criteria outlined in the Tall Building Design Guidelines, particularly regarding off-site separation. Tower D has a physical separation distance of 13.6 meters, which does not meet the required off-site separation on the south side and the on-site separation with Tower C. Similarly, Tower E requires a separation distance of 18.7 meters, but the proposed tower falls short on both the west and south sides.	Tower E – South side = 7.61m West side = 8.28m Tower D – South side = 10.00m Between D+C Towers = 25.12m
A compatibility study should be provided to address potential impacts on the adjacent low-rise residential area. This report should identify existing and potential compatibility issues and identifies and evaluate options to achieve appropriate design, buffering, transitions and separation distances. Recommended measures intended to eliminate or mitigate negative impacts and adverse effects should be provided.	Noise, Wind, and Traffic studies have been submitted with the applications and address potential compatibility issues. Required mitigation will be implemented through Site Plan Approval.

Comment	Response
An angular plane, typically 45°, measured from the relevant property lines, should be used to provide a frame of reference for transition in scale from proposed high-rise buildings down to the existing lower-scale areas. The proposed Tower D fails to meet off-site separation requirements and does not comply with the 45° angular plane analysis, resulting in an insufficient transition to the low-rise residential tower. Similarly, Tower E does not offer an adequate transition to the low-rise, as it also does not meet the 45° angular plane criteria. Additional design modifications should be made to either lower the height of the proposed towers or increase the off-site separation towers or exceed the off-site separation.	Heights have been lowered on tower D and E and C – Also Tower D has been set back from the podium facing Victoria Marie Court on the South – refer to A0.3.
Urban Design Staff is not supportive of placing three tall towers in close proximity to the adjacent low-rise neighborhood. The proposed towers, due to their scale, height, mass and proximity to the adjacent low-rise neighborhoods, will create an enclosed streetscape that hinders sky view and creates an overwhelming scale in the public realm.	The plans have been revised to reduce height, as described above.
The proposal will benefit from terraced buildings with additional setbacks/step-backs, and shifts in volume to create enhanced views and stepped terraces. You may need to consider lowering the height of the proposed towers with additional setbacks to achieve TBG criteria and compatibility while mitigating unwanted impacts. This will help transition to the adjacent neighborhood and add benefits for sky views, sun/shadow and microclimate. Please see the attached precedent images.	Tower D is set back 5.35m from street facing elevations.
The City's Tall Building Guidelines should be consulted to inform the revised design of the site with respect to the following: a. Tower design b. Podium characteristics c. Outdoor Amenity	The Urban Design Brief addressed the City's TBG. In discussion with staff, the UDB will be revised pending City staff's review of the updated architectural plans.

Comment	Response
Contemporary architectural style and details are to be refined through the site plan process. The building facades facing Street should contain an appropriate amount of detailing and articulation, particularly at the podium and tower. Consider adding further architectural expression to the street-facing elevations; explore options to maximize interest and expressiveness of exposed podium facades. This can include strategically incorporating public art and visual elements into the exposed facades.	Noted. Refer to renderings for this submission showing ground level articulation on and around the park area. Also see drawing A0.1
From the urban design standpoint and activation of the streetscape, we support having a podium at five or 6 storeys. The height of the podium should be proportional to the right-of-way width. The podium height is usually expected to be in a range of 4 to 6 storeys in order to achieve a satisfactory human scale.	Noted. Refer to renderings which illustrate this showing retail spaces at the ground level spilling into park area.
The proposed corner treatment will be further enhanced to create visual interest at the street edge.	Refer to updated renderings.
The tower should step back from its base a minimum of 3m along any street-facing elevations.	Tower D is set back 5.35m from street facing elevations.
The proposed podium along Street should be broken down using enhanced detailing and articulation.	Refer to updated renderings.
The tower should be situated in a location that makes an effort to maximize views from the adjacent properties and the streetscape. The proposal will benefit from additional setbacks/step-backs and shifts in volume to create enhanced views and stepped terraces. This will help transition to the adjacent neighborhood and benefit sky views, sun/shadow and microclimate. Please see attached precedent images.	Towers are strategically placed for maximum views.
Required amenity space calculations are contained in the Urban Design Manual and include two parts – one for a general amenity area and one for children's play facilities in multiple residential developments. (2m2 x #units) + (2.5m2 x #bedrooms - #units) = outdoor amenity space.	Refer to updated site statistics chart.

Comment	Response
The Urban Design Brief should include text and conceptual images that demonstrate the commitment to providing sufficient and appropriate amenity space for all potential residents on site.	In discussion with staff, the UDB will be revised pending City staff's review of the updated architectural plans.
Wind assessment is required for outdoor amenities and the pedestrian realm.	Please refer to updated report.
The submitted shadow analysis is incomplete as it does not include the shadow studies for June 21, September 21, and December 21 from 7 a.m. to 8 p.m.	Additional shadow studies have been included.
A confirmation has to be provided that the proposal maintains daily access to 5 hours of cumulative direct sunlight to nearby sidewalks and open spaces under equinox conditions, beginning with the sidewalk located on the opposite side of adjacent ROWs.	Throughout the day nearby sidewalks and open spaces receive varying degrees of sunlight. Please see shadow studies A5.1-A5.4.
The wind study has identified several areas on the site plan—specifically between Buildings C and E, and at the northeast corner of Building C—that will experience uncomfortable wind conditions. The wind study should include the latest tower design and site plan as the basis for the analysis.	Refer to updated Wind Study.
A revised design proposal that addresses the wind impacts outlined in the submitted wind study should be developed. A full tunnel study should be submitted at the site plan stage.	Refer to updated Wind Study.
Details of the streetscape are to be provided. Any streetscape elements proposed are to be reviewed.	Review updated renderings.
The area between the building's face and the property line should be well integrated with the street and public realm to deliver high-quality, seamless private, semi-private and public spaces.	Review updated renderings.
The proposed linear park should be coordinated with Park and Cemeteries.	Noted.
Active uses including indoor/outdoor amenity areas or residential lobbies should be situated along Street and the proposed linear park.	Revie updated renderings.

Comment	Response
The proposed long podiums D and E should be broken down using enhanced detailing and articulation. According to Tall Building Design Guidelines, buildings longer than 70m should demonstrate enhanced streetscaping, materials and building articulation.	Please see renderings more articulation will be developed during the SPA phase
The proposed corner treatment for podiums C & E is to be further enhanced to create visual interest at Street. This could be achieved by special massing and architectural treatments on both streets to give prominence along the frontages and visually distinguish these sites.	Commercial spaces have been added to enhance visual interest on the street – please view renderings / plans drawing A0.1
Incorporate creative facade ideas on curtain walls with advanced exterior lighting that could help to control public flow and could improve the building design. Digital media facades make buildings tell stories and strike a perfect balance of aesthetic structures and illumination art (for example sustainable and digital technologies within the curtain wall, colour light-emitting diode or LED Display Video walls, and Photometric system for 'interactive skin' to illuminate the screen after dark, digitally printed fritted glass)	Please view updated renderings for this submission especially animated retail spaces being shown in renders
Provide multiple above-grade rooftops and podium amenities with a minimum of (2 sq.m X # units) + (2.5 sq.m x # bedrooms - # units) = outdoor amenity space. The amenity space should be high quality and should connect to the building.	We have increased the amenity areas for each building indoor and outdoor please review plans and statistics for information.
The building facades fronting Street should contain the primary residential and commercial entrances and the appropriate amount of glazing and articulation, particularly along the lower 5m where the building addresses the sidewalk.	Please view renderings, Also see drawing A0.1
Consider stepbacks for the upper storeys in the tower, both to increase articulation/visual interest in the building and create room for shared outdoor amenity space. This will also facilitate the transition to low-rise neighbourhoods.	Noted, refer to updated renderings.
All at-grade parking should be wrapped with active uses.	Noted.

Comment	Response
The area between the building's face and the property line should be well integrated with the street and public realm to deliver high-quality and seamless private, semi-private and public spaces.	This has been integrated, please view renderings
The tower should step back from its base a minimum of 3m along any street-facing elevations.	Building D has been revised as discussed in meeting with staff on July 7, 2025.
The underground parking structure should have a sufficient setback from the property lines to accommodate the necessary soil volume to support required large-statured, high canopied trees. Perimeter trees should not be located on the garage slab roof. Within the site, required tree plantings can be accommodated on the garage slab but will still require standard minimum soil volumes.	To be addressed during Site Plan Approval.
Provide natural surveillance by employing high percentages of glazing, and active uses at ground level and incorporate more units with patios and windows/balconies on the main facade with views onto Street.	Ground Floor updated to incorporate more units with patios and glazing – please refer to renderings.
The proposed towers should have unique top features that are architecturally excellent, highly visible and makes a positive contribution to the image of Kitchener developing skyline.	Please see renderings.
Provide materiality and texture shifts at the podium and across the towers and incorporate variations in tower setbacks from the base to distinguish the tower form from the podium.	Please refer to renderings
Wind assessment, Noise feasibility and shadow study required for outdoor amenity and the pedestrian realm.	Refer to updated studies.
Residential entrances should be clearly identified and offer access from both the public realm and the central spine of the site. The proposed main entrance is to be further enhanced to create visual interest at the street edge. (for example cantilevered entrance canopy, corrugated-metal panels and fritted glass.	Please view renderings and Ground Floor plan A2.4 with labelling

Comment	Response
Balconies may be staggered in a creative pattern to lighten the structure and provide private outdoor space for the units.	Noted.
Towers are highly visible elements of the urban environment and must meet Kitchener's highest standards for design excellence. The building should be designed and clad with different materials and colours so that they read as distinct from one another.	Noted.
All utilities should be coordinated with the landscape design and with building elevations to provide a high-quality pedestrian experience with the site and from the public realm. Infrastructure should be located within the building in mechanical/electrical rooms and exterior connections located discretely and incorporate physical screens or landscape plating as required. Surface transformers or service connections visible from the public realm are not supported.	Noted, to be addressed during Site Plan Approval.
I have enclosed some precedents for the proposed linear park.	Noted.
Fire Prevention, Jennifer Arends jennifer.arends@kitchener.ca, 519-783-7983	
Fire access would need to be worked out. For the two connected buildings the turning radii to get to the shared lobby is too small. It has to be 12 meters on centerline. Likely will need multiple private hydrants.	Updated and reviewed on A2.4 Ground Floor
Park Planning, Lenore Ross lenore.ross@kitchener.ca, 519-783-8917	
Language and labels across all plans and documents should clarify that the various outdoor at-grade amenity spaces are proposed to be privately owned and allow access and use by all members of the associated condominiums and the general public.	Updated on A2.4

Comment	Response
Additional Parkland Dedication to account for the increased residential density is required as a combination of cash in lieu of land and POPS agreements / public access easements to allow non-residents access to the proposed park-like facilities adjacent to Oscar Lauber Park. The Parkland Dedication will be assessed and required as a condition of Final Site Plan approval and subject to the design, review and approval of the outdoor amenity spaces. The presence of significant SWM and LID infrastructure beneath the proposed landscaped areas may limit proposed features and utility as an active amenity space.	To be further discussed at the Site Plan Stage for each phase.
An estimate of the required cash in lieu is provided below… $4,414,147 CIL.	Noted with thanks, amount to be discussed for each phase at Site Plan stage.
The submitted CFD Study identifies isolated areas within the site where pedestrian wind comfort conditions could be improved with building and landscape design features. These mitigation measures will be expected at the detailed review stage as a condition of Final Site Plan approval and should be confirmed with a full Wind Tunnel study. Conditions and impacts in at-grade and podium level amenity spaces, the adjacent public realm and in the public park should be assessed and satisfactory wind comfort and safety levels confirmed.	Noted.
Language and labels across all plans and documents should clarify that the various outdoor at-grade amenity spaces are to be privately owned and allow access and use by all members of the associated condominiums and the general public.	To be addressed during Site Plan Approval and clarified during the Public Meeting.

Comment	Response
The UDB page 22 indicates that the "specific programming and design details will be determined through the site plan application." However, there are numerous 'features' mentioned throughout both the UDB and the PJR and include references to a water feature (wind study), public art, seating and large canopy trees (UDB page 30; precedent images and some feature references are included in the PJR page 11-12. The commitment and focus of the at-grade amenity spaces should be coordinated between documents and presented clearly in the Urban Design Brief to guide detailed design at the site plan application stage.	In discussion with staff, the UDB will be revised pending City staff's review of the updated architectural plans.
All shadow impact and noise studies should confirm acceptable conditions in outdoor amenity spaces as part of Final Site Plan approval. Mitigation measures should be provided to achieve acceptable conditions for expected and required use.	Noted.
Revised Urban Design Brief and Planning Justification Reports are required.	In discussion with staff, the UDB will be revised pending City staff's review of the updated architectural plans.
Region of Waterloo Planning, Will Towns **wtowns@regionofwaterloo.ca, 519-616-1868**	
Regional staff have received the Noise Feasibility Study prepared by HGC Engineering (dated June 3, 2024) in support of this application. As the study does not include the assessment of any Regional roads and in keeping with the scope of the Region's responsibilities following the proclamation of Bill 23 locally on January 1, 2025, Regional staff have no comment on this study.	Noted with thanks.

Comment	Response
Regional Transportation Demand Management (TDM) staff have reviewed the Transportation Impact Study and Parking Study prepared by Paradigm Transportation Solutions (dated October 2024) and are generally supportive of proposed parking reductions, particularly given by the proposed provision of subsidized transit passes to all occupants for two years. The applicant is advised that providing subsidized transit passes incurs significant financial and administrative costs – this initiative requires a commitment from the owner/applicant to manage, administer, and fund the full cost of monthly transit passes for residents. To ensure success, further consultation and confirmation of expectations between all three parties (the applicant, City, and Region – GRT) is required as soon as possible. Please contact IBalaban@regionofwaterloo.ca to discuss.	Noted with thanks, consultation with the City, Region, and GRT will be initiated at a future date for all three phases.
Four of the proposed 12 car share spaces are not indicated on the plans. Staff would recommend providing these spaces as surface parking to make them accessible to all residents of the development.	Noted.
Bike rooms should have two wide, automatic, sliding doors near elevators with sufficient clearance from parked cars. 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. Consider providing bike fix-it and wash stations as well in or near secure bike parking,	Noted.
Buildings could also provide current transit and bike route maps in common areas, and/or a screen linked to the GRT NextRide webpage (https://nextride.grt.ca) showing customizable real-time departure information for nearby bus stops.	We appreciate this suggestion and welcome discussions at future dates for all three phases.

Comment	Response
Staff from the Region of Waterloo International Airport have reviewed the application and have concerns with the proposal. The development is located within the proposed Airport Zoning Regulation area, wherein the property has an estimated allowable height of 468.7 metres above sea level (ASL). The architectural plans submitted in support of the application specify a maximum building height of approximately 115 metres above the ground (including the mechanical penthouse) and a maximum finished floor elevation of 338.1 metres ASL, for a total building height of approximately 453 metres ASL. This leaves only 15.5 metres above the building for any cranes, which is not expected to be sufficient.	The heights have been reduced.
The developer will need to submit a Land Use application to Nav Canada for all buildings and cranes, and obtain a letter of no objection to the satisfaction of the Region prior to the City of Kitchener Council considering the applications. Please note that the Region may consider a temporary exemption to the proposed AZR if the Nav Canada Land Use assessment does not identify any impacts to airport operations from the crane. The developer will also need to submit an Aeronautical Assessment Form to Transport Canada and comply with all requirements.	Nav Canada form was submitted with initial application.

Comment	Response
In keeping with ROP policy 8.D.3 pertaining to multi-residential development applications, Regional staff require the developer to complete a Salt Management Plan as part of a future site plan application. As part of this plan, the applicant is encouraged to incorporate the following with respect to salt management: - 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 and/or driveways. 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.	Noted.
Regional staff understand that geothermal wells are currently utilized on-site for the existing buildings in the subdivision. The proponent is asked to provide available information about the system (i.e. number of holes, open or closed loop, and the associated hydrogeological assessment) to the Region for review. Please note that any newly-proposed or expanded geothermal system would be subject to a hydrogeological assessment and may not be supported due to the known contamination on-site.	To be addressed during Site Plan Approval.
Finally, please note that the Region does not support permanent active or passive dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. Below-grade infrastructure requiring dry conditions should be waterproofed in the final design for the site.	Noted.

Comment	Response
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 additional affordable housing units on the site, as defined in the Provincial Planning Statement 2024 (PPS 2024). Rent levels and house prices that are considered affordable according to the PPS 2024 are provided below in the section on affordability. These are the levels and prices for which developments will be eligible for Regional Development Charge exemptions.	To be discussed at the Site Plan stage for all three phases.
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. 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.	We welcome a discussion about affordable housing units at the Site Plan stage for each building.
According to the PPS 2024, an affordable housing price is the lesser of the following values: - A price 10 percent below the average purchase price of a resale market unit; or - A price for which payments would not exceed 30 percent of gross annual household income at the 60th percentile.	Noted with thanks, we welcome a discussion about affordable housing units at the Site Plan stage for each building.
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 Kitchener must be at or below is $370,100 (Provincial Bulletin, June 2024). According to the PPS 2024, affordable rent is the lesser of the following values: - Average market rent provided annually by the Canada Mortgage and Housing Corporation; or - Rent which would not exceed 30% of gross annual renter household income at the 60th percentile.	Noted with thanks, we welcome a discussion about affordable housing units at the Site Plan stage for each building.

Comment	Response
For a rental unit to be deemed affordable, the rent for the proposed units in the City of Kitchener must be at or below Source: Provincial Bulletin, June 2024): - Studio $1,117 - One Bedroom: $1,322 - Two Bedroom: $1,594 - Three+ Bedroom: $1,779 Please do not hesitate to contact Housing Services staff directly at JMaanMiedema@regionofwaterloo.ca or 226-753-9593 should you have any questions or wish to discuss in more detail.	Noted with thanks, we welcome a discussion about affordable housing units at the Site Plan stage for each building
Note that the Region's Threat Inventory Database identifies a known threat on the property associated with Lang's Tannery and a high threat associated with a former tool and die manufacturer – however, Regional staff understand that previous Planning Act applications have addressed concerns associated with these threats, including the acknowledgement of a Record of Site Condition by the Ministry of the Environment, Conservation and Parks. City staff are advised to contact the undersigned if additional information is required.	Noted with thanks.

Comment	Response
The Region understands that $9,250 in Regional fees have been submitted to the City of Kitchener for transmittal to the Region. Regional staff note that there are discrepancies both in total value and required elements. For clarity and in accordance with Regional Fee By-law 24-052, the following fees apply to the Region's review of this application: - $3,000 – Zoning by-law Amendment application review fee - $7,000 – Official Plan Amendment application review fee Note that no noise study review fee is required (see discussion above in relation to environmental noise – no Regional roads have been assessed), and the OPA review fee is out of date. Please contact PWalter@regionofwaterloo.ca to pay the balance ($750) of required fees.	Fees have been clarified and taken care of with the Region via e-mail.
Waterloo Catholic District Schoolboard, Isabelle Lung Ler isabelle.lungler@wcdsb.ca, 519-578-3677, x2355	
1. That any Education Development Charges shall be collected prior to the issuance of a building permit(s).	Noted with thanks, Education DCs will be paid accordingly.
2. That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/).	Sign to be installed at each building during Site Plan stage.

Comment	Response
3. That the developer shall include the following wording in the site plan agreement to advise all purchasers of residential units and/or renters of same: a. "*In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point."*	We agree to including this clause in the Site Plan Agreements for each building.
4. That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a Holding Zone advisory sign (at the developer's expense and according to the Board's specifications) advising prospective residents about the Waterloo Catholic District School Board Holding Zone designation applied to the subject property. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/).	Sign to be installed at each building during Site Plan stage.
5. That the developer shall include the following wording in the site plan agreement to advise all purchasers of residential units and/or renters of same: a. "*Waterloo Catholic District School Board present and future families - please note that your new home is located in an area that has been designated as a Holding Zone as we await construction of a new school(s) or additional capacity. Students may be accommodated temporarily in a Holding School(s). Please visit www.wcdsb.ca/accommodations for additional information."*	We agree to including this clause in the Site Plan Agreements for each building.
Waterloo Region District School Board, Emily Bumbaco emily_bumbaco@wrdsb.ca	
The WRDSB supports active transportation, and we ask that pedestrians be considered in the review of all development applications to enhance safety and connectivity. Students from this development may be able to walk to their neighbourhood school.	Noted.

Comment	Response
Please be advised that Student Transportation Services of Waterloo Region (STSWR)'s school buses will not travel privately owned or maintained right-of-ways to pick-up/drop-off students. Transported students will be required to meet the bus at a congregated bus pick-up point. STSWR may have additional comments about student pick-up point(s) placement on municipal right-of-ways.	Noted.
Concerning any future declaration or agreement, the WRDSB requests the following conditions: 1. That the Owner must agree in the Condominium Declaration and/or Site Plan Agreement to notify all purchasers of residential units and/or renters of same, by inserting the following clauses in all offers of Purchase and Sale/Lease: a. "Despite the best efforts of the Waterloo Region District School Board (WRDSB), accommodation in nearby facilities may not be available for all anticipated students. You are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may, in future, be transferred to another school." b. "For information on which schools are currently serving this area, contact the WRDSB Planning Department at 519-570-0003 ext. 4419, or email planning@wrdsb.ca. Information provided by any other source cannot be guaranteed to reflect current school assignment information." c. "To limit liability, public school buses operated by the Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."	We agree to including these clauses in the Site Plan Agreements for each building.

Comment	Response
2. That the Owner supplies, erects and maintains a sign (at the Owner/Developer's expense and according to the WRDSB's specifications), near or affixed to the development sign, advising prospective residents about schools in the area and that prior to final approval, the Owner shall submit a photo of the sign for review and approval of the WRDSB;	Sign to be installed at each building during Site Plan stage.
Please be advised that any development on the subject lands is subject to the provisions of the WRDSB's Education Development Charges By-law, Amended in 2022 or any successor thereof and may require the payment of Education Development Charges for these developments before building permit issuance.	Noted with thanks, Education DCs will be paid accordingly.
Transportation, Dave Seller dave.seller@kitchener.ca, 519-783-8152	
Transportation Services value the owner's commitment to providing fully subsidized GRT transit passes for a two-year period, which we support. However, we would caution this, as not all occupants after the two-year period elapses will continue to be part of the GRT ridership. Based on this, we are of the opinion that the parking spaces must be unbundled from the cost of a unit. This approach will allow for the unbundled vehicle parking to be in place for the life of buildings C, D and E, even when the subsidized 2-year GRT passes have expired.	Parking spaces will be unbundled at sales.
Transportation Services support the proposed total parking supply of 883 spaces for the 1151 units, provided that at a minimum, the parking spaces must be unbundled from the cost of a unit. Of the 883 total parking spaces being provided, 806 (0.70 sp/unit) be designated for residential parking and the remaining 77 (0.066 sp/unit) spaces are allocated for visitor parking.	Noted with thanks.

Comment	Response
Enova Power Corp, Shaun Wang shaun.wang@enovapower.com, 226-896-2200x6312	
1. As part of the underground loop system, Enova Power owned HV Switchgear (5-way Vistagear) may be required to be installed within the property, either room or vault, as per Enova Power's Service Guideline, locations TBD. The HV Switchgear shall be installed at the ground level with exterior access.	Once we move on to the Site Plan Applications for each building, we welcome further review and comments from Enova Power.
2. Enova Power may request easement for HV Switchgear room/duct bank within the property.	Once we move on to the Site Plan Applications for each building, we welcome further review and comments from Enova Power.
3. Enova Power may require remote monitoring/switching of the HV switchgear, a radio antenna may be required to set up at the top of the proposed building, with 2"duct to the HV Vistagear. A 120V AC power supply to be provided by the developer.	Once we move on to the Site Plan Applications for each building, we welcome further review and comments from Enova Power.
4. Enova Power will supply transformer up to 1500kVA for service entrance up to 600V, 2000A. Any request for Tx capacity larger than 1500kVA shall be customer-owned.	Once we move on to the Site Plan Applications for each building, we welcome further review and comments from Enova Power.