

Attachment J - Public Comments

February 27, 2025

Growing Together East Team
City of Kitchener – Planning Division
200 King Street West, Kitchener, ON

Attention: Natalie Goss
Manager, Policy and Research

Subject: Request for assigning SGA-2 zoning to 152 Siebert Ave, 396 and 402 Vanie Dr

Thank you for the meeting on February 13, 2025. Based upon your input the updated submission is as follows.

We appreciate the City's ongoing efforts to improve zoning regulations within the PMTSA areas as part of the Growing Together East project. We are writing to bring your attention to the Draft Zoning By-Law Amendment, which currently proposes to designate these three adjoining properties identified in Figure 1 as SGA-1 zoning.



Figure 1 Subject properties

On behalf of the property owners, we respectfully request that these properties be designated as SGA-2 zoning instead, as this designation is more appropriate for the site. The rationale for this request is as follows:

1. **Proof of Ownership:** These three properties are under common ownership (ownership documentation has been provided for reference and is confidential).
2. **Contextual Fit:** The subject properties are already surrounded on two sides by proposed SGA-2 zoning, as illustrated in Figure 2. Assigning SGA-2 zoning would ensure consistency with the proposed land use pattern and planned growth framework.

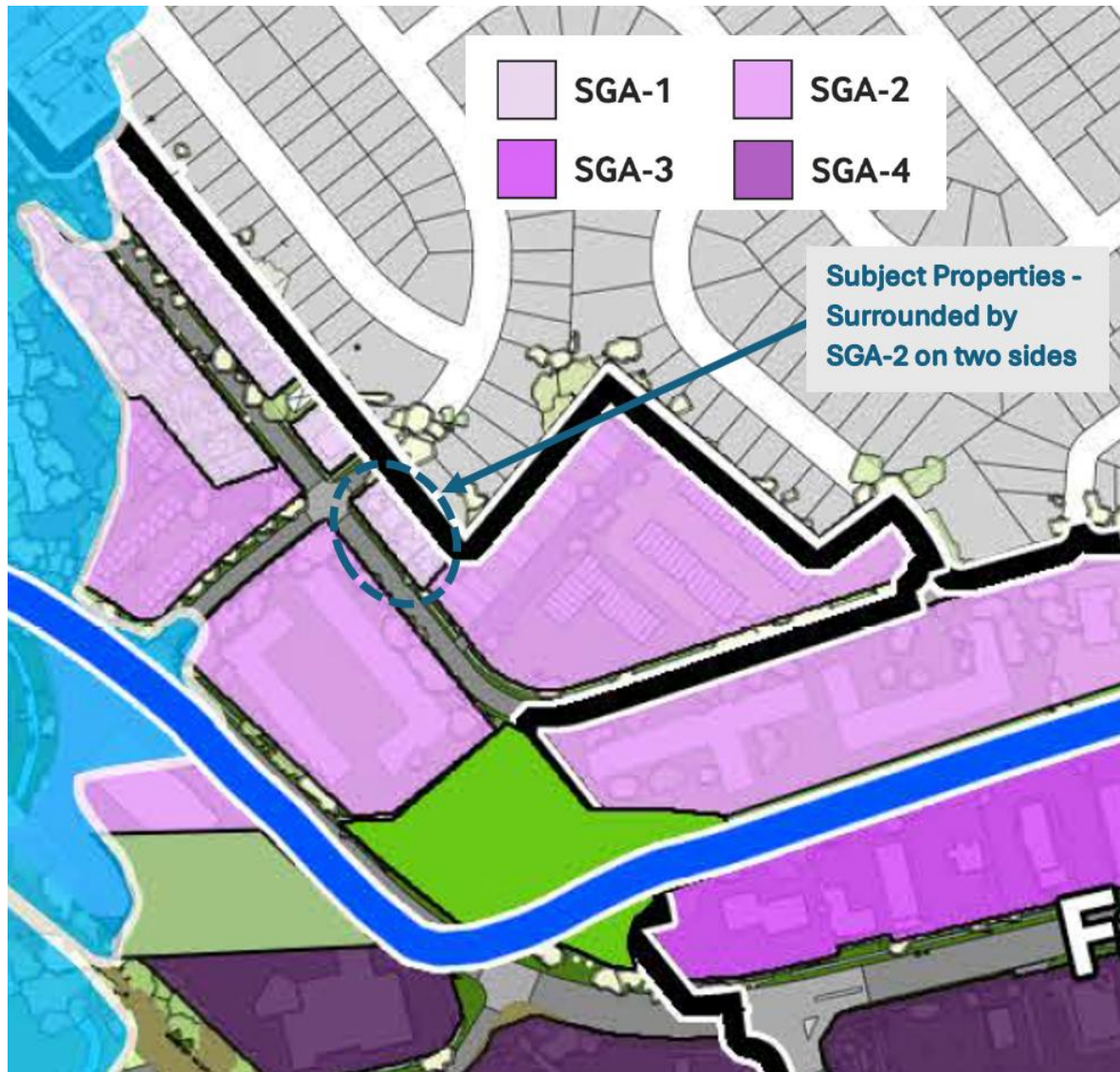


Figure 2 Subject properties surrounded by proposed SGA-2 zoning

- 3. Development Potential:** A preliminary Concept Plan (Figures 3 and 4) has been prepared in alignment with SGA-2 zoning regulations, demonstrating the feasibility of an 8-storey residential development with approximately 54 units.



Figure 3 Preliminary Concept Plan showing 8-storey building

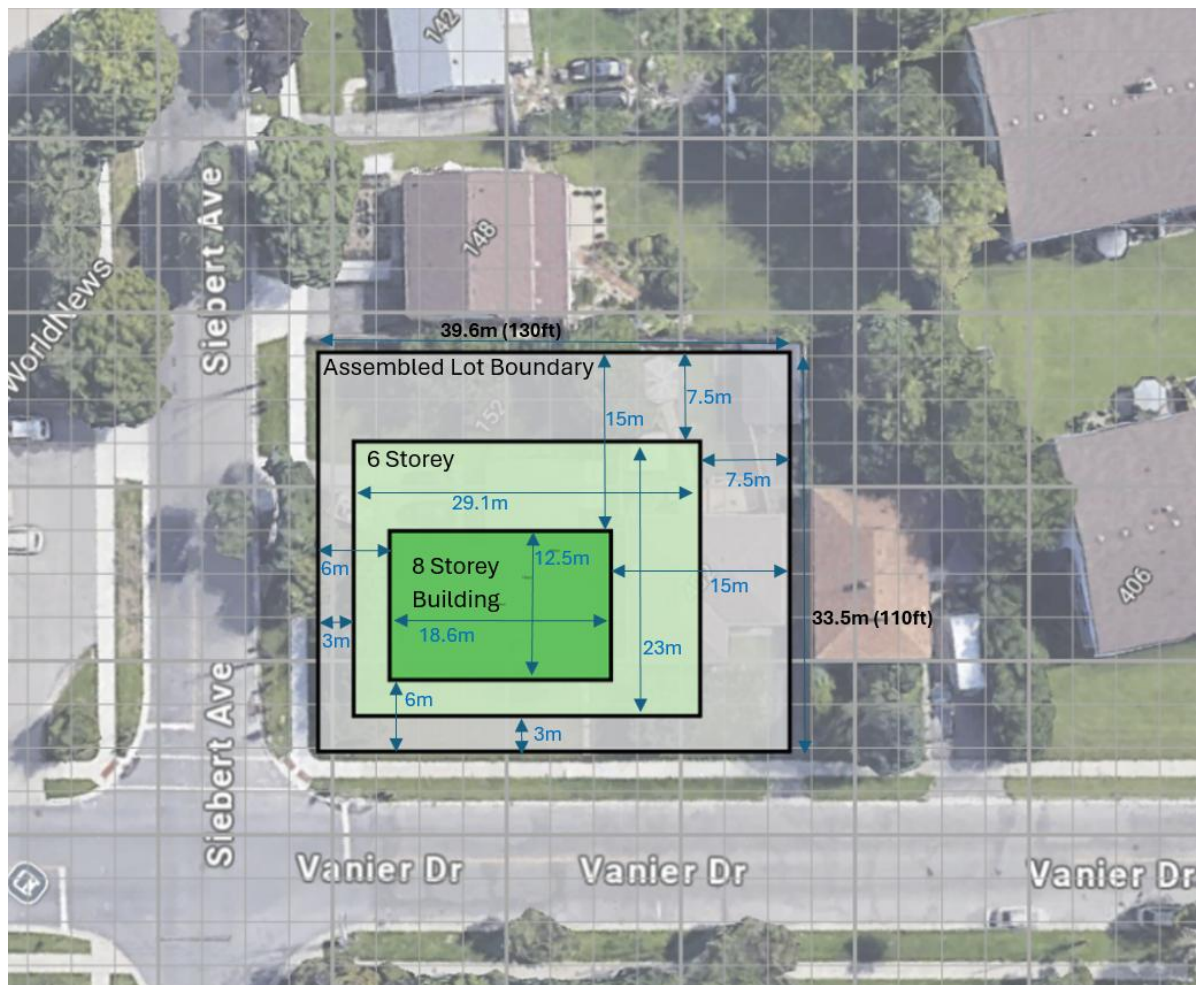


Figure 4 Preliminary Concept Plan as per SGA-2 requirements

- 4. Zoning Compliance with SGA-2:** The zoning compliance table given below confirms general compliance of the proposed development to the requested SGA-2 zoning.

8-Storey Building	SGA-2 Requirement	Proposed Development	Compliance
Minimum lot width	30m	39.6m	Yes
Minimum lot area	1500m ²	1327m ²	No (will be addressed as Minor Variance and opportunities of further consolidation exist)
Minimum yard setback	3.0m	3.0m	Yes
Minimum floor space ratio	1.0	3.38	Yes
Maximum building height	8 storeys	8 storeys	Yes
Minimum façade openings	10%	10%	Yes
Minimum street line façade openings	20%	20%	Yes
Minimum landscape area	20%	20%	Yes
For Storeys 7 and Above			
Minimum yard setback	6.0m	6.0m	Yes
Maximum building length	60.0m	29.1m	Yes
Maximum floor plate area	2000m ²	233m ²	Yes
Transition to Low Rise Zones			
Maximum building height within 15m of a lot with an SGA-1 zone or a lot with a low-rise residential zone	20.0m	20.0m	Yes
Minimum <i>yard setback</i> where the <i>lot</i> abuts a <i>lot</i> with an SGA-1 zone or a <i>low-rise residential zone</i>	7.5m	7.5m	Yes

5. Justification for Policy 15.D.2.5 in the draft Official Plan:

As requested by the Planning Division, the requested change from the SGA-1 Zone to the SGA-2 Zone for the assembly is justified when considering the factors outlined in Policy 15.D.2.5 in the draft Official Plan Amendment, as follows:

a) Compatibility with the planned function of the subject lands and adjacent lands:

The preliminary development plan for the proposed 8-storey residential building aligns with the planned function of both the subject properties (assembly) and adjacent properties. The properties on two sides of subject properties are already proposed to be SGA-2 (Figure 2), reinforcing the area's planned growth strategy. The addition of approximately 54 dwelling units at the subject properties would contribute to the planned function to support the focus for population and employment growth. This development is consistent with the "Strategic Growth Area A" land use designation, which is intended to accommodate intensification within existing residential neighbourhoods.

b) Suitability of the lot for the proposed use and/or built-form:

The consolidated lot is well-suited for a mid-rise (8-storey) residential development, aligning with the SGA-2 Zone's built form requirements. The combination of three properties results in a sufficiently sized lot that can effectively accommodate the proposed density and design. Additionally, the lot's dual street frontage enhances accessibility and allows for a flexible, street-fronting design, improving both functionality and urban integration.

c) Lot area and consolidation as further outlined in Policy 3.C.2.11:

The proposed preliminary development plan consolidates three properties, supporting intensification in alignment with Policy 3.C.2.11. The resulting lot area is substantially close to the required minimum for SGA-2 zoning, making it well-suited for mid-rise development. Additionally, there remains potential for further consolidation, which could enhance site efficiency, optimize land use, and support a more comprehensive planning approach.

d) Compliance with the City's Urban Design Manual and Policy 11.C.1.34:

Not Applicable, as proposal is SGA-2 only (i.e. only 8 stories)

e) Cultural heritage resources, including Policy 15.D.2.8:

Not Applicable. It is our understanding that there are no Designated or Listed heritage resources proximate to the subject properties.

f) Technical considerations and other contextual or site specific factors:

At this early stage of the due diligence and planning process, no significant technical challenges have been identified. However, key factors such as servicing capacity, traffic impact, geotechnical conditions, environmental considerations, and urban design integration will be assessed as the project progresses. The proposed development is expected to align with existing infrastructure and planning policies, ensuring efficient land use and compatibility with the surrounding area.

We kindly request your consideration of this zoning adjustment and remain available to provide any additional information or clarification as needed. Assigning SGA-2 zoning to the subject properties at this stage would streamline the development process, minimizing the need for future zoning amendments, reducing costs and delays, and facilitating a more efficient path toward achieving the City's growth objectives.

Thank you for your time and attention to this request. We look forward to your support and further discussions.

Sincerely

Sam

From: [REDACTED]
To: [Growing Together \(SM\)](#)
Cc: [Adam Clark](#)
Subject: Re: 396. 402 Vanier Dr. and 152 Siebert Ave. meeting follow-up
Date: Tuesday, March 11, 2025 2:54:55 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Dear Adam and Growing Together Team,

This is a great news. Thank you very much for your guidance and support.

Sincerely

Sam

On Tue, Mar 11, 2025, 10:43 a.m. Growing Together (SM) <GrowingTogether@kitchener.ca> wrote:

Good Morning Sam,

Thank you for your submission, we have reviewed and I'm pleased to report that we will be recommending an SGA-2 zone for 396 & 402 Vanier Dr., as well as 152 Sibert Ave. If you have any additional questions or comments, please let me know.

Best,

Adam Clark (he/him)

Senior Urban Designer (Architecture & Urban Form) | Planning | City of Kitchener | 519-783-8931 | TTY 1-866-969-9994 | adam.clark@kitchener.ca



From: [REDACTED]
Sent: Thursday, February 27, 2025 8:46 PM
To: Adam Clark <Adam.Clark@kitchener.ca>
Cc: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Re: 396. 402 Vanier Dr. and 152 Siebert Ave. meeting follow-up

Dear Adam and Growing Together Team,

Thank you very much for the meeting on February 13th. As per your input the updated submission is attached. The proof of ownership has already been provided.

Please review and let us know if you have any questions.

Thank you

Sincerely

Sam

On Thu, Feb 13, 2025 at 4:07 PM Adam Clark <Adam.Clark@kitchener.ca> wrote:

Good Afternoon Sam,

Following up on today's meeting, this is the text of policy 15.D.2.5, with the portions of the policy we discussed in red text. If you can provide us with a written response similar to the one at the bottom of this email (explaining how your proposal meets objectives a), b), c) and f)), alongside the concept and zoning chart you presented today, we'll have all the submission requirements we need. Please let us know if you have any other questions. Thank you!

15.D.2.5. Notwithstanding policies 4.C.1.8 and 4.C.1.9, site specific applications which seek relief from the implementing zoning through a minor variance(s) or amendment to the Zoning By-law, and/or seek to amend this Plan will consider the following factors:

- a) Compatibility with the planned function of the subject lands and adjacent lands;**
- b) Suitability of the lot for the proposed use and/or built-form;**
- c) Lot area and consolidation as further outlined in Policy 3.C.2.11;**
- d) Compliance with the City's Urban Design Manual and Policy 11.C.1.34;
- e) Cultural heritage resources, including Policy 15.D.2.8; and,
- f) Technical considerations and other contextual or site specific factors**

Adam Clark (he/him)

Senior Urban Designer (Architecture & Urban Form) | Planning | City of Kitchener | 519-783-8931 | TTY 1-866-969-9994 | adam.clark@kitchener.ca



Example

Justification

As requested by the Planning Division, the requested change from the SGA-3 Zone to the SGA-4 Zone for the assembly is justified when considering the factors outlined in Policy 15.D.2.5 in the draft Official Plan Amendment, as follows.

- a. compatibility with the planned function of the subject lands and adjacent lands;**

The preliminary development plans for a high-rise mixed-use development would be compatible with the planned function for the assembly and adjacent properties as they are within the highest order area for intensification and building heights

from an urban structure and land use designation perspective. The addition of approximately 500 dwelling units and ground floor commercial spaces through the assembly's redevelopment would contribute to the Downtown's planned function as a focus for population and employment growth. The assembly consolidates five properties within the "Strategic Growth Area C" designation for a significant, high-density intensification at a key corner of Downtown.

b. suitability of the lot for the proposed use and/or built-form;

The assembly provides a suitable lot for a podium and tower development form. The consolidation of the five properties provides a sufficient size lot that can achieve the SGA-4 Zone's built form requirements for the tallest tower heights. The assembly's dual street frontage provides flexibility for access and street fronting design.

c. lot area and consolidation as further outlined in Policy 3.C.2.11;

The assembly's lot area following consolidation would satisfy (and meaningfully exceed) the minimum lot area requirements for a functional podium and towers over 25 storeys in height. The lot area and configuration of the assembly allows a tower scheme that satisfies and exceeds the physical separation requirements of the SGA4 Zone for the tallest heights. Further consolidation of the assembly with abutting properties is unlikely given the nature and built form on the abutting properties at 214 Queen Street South and 25 Joseph Street.

f. technical considerations and other contextual or site specific factors;

There are no known technical considerations at this time given the owners are early in the diligence and planning process. The addition of 168 Queen to the assembly would improve design flexibility and options and the owners would like to explore its possible acquisition and inclusion; regardless, we would ask for it be zoned similarly to the assembly should a change to SGA-4 occur.

From: [REDACTED]
To: [Adam Clark](#)
Cc: [Growing Together \(SM\)](#)
Subject: Re: 396. 402 Vanier Dr. and 152 Siebert Ave. meeting follow-up
Date: Thursday, February 27, 2025 8:46:29 PM
Attachments: [image001.png](#)
[image002.png](#)
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[image007.png](#)
[image008.png](#)
[image009.png](#)
[396 & 402 Vanier Dr and 152 Siebert Ave - Request for SGA2 Zoning - Rev01.pdf](#)

Dear Adam and Growing Together Team,

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Please review and let us know if you have any questions.

Thank you

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e) Cultural heritage resources, including Policy 15.D.2.8; and,

f) Technical considerations and other contextual or site specific factors

Adam Clark (he/him)

Senior Urban Designer (Architecture & Urban Form) | Planning | City of Kitchener | 519-783-8931 | TTY 1-866-969-9994 | adam.clark@kitchener.ca



Example

Justification

As requested by the Planning Division, the requested change from the SGA-3 Zone to the SGA-4 Zone for the assembly is justified when considering the factors outlined in Policy 15.D.2.5 in the draft Official Plan Amendment, as follows.

a. compatibility with the planned function of the subject lands and adjacent lands;

The preliminary development plans for a high-rise mixed-use development would be compatible with the planned function for the assembly and adjacent properties as they are within the highest order area for intensification and building heights from an urban structure and land use designation perspective. The addition of approximately 500 dwelling units and ground floor commercial spaces through the assembly's redevelopment would contribute to the Downtown's planned function as a focus for population and employment growth. The assembly consolidates five properties within the "Strategic Growth Area C" designation for a significant, high-density intensification at a key corner of Downtown.

b. suitability of the lot for the proposed use and/or built-form;

The assembly provides a suitable lot for a podium and tower development form. The consolidation of the five properties provides a sufficient size lot that can achieve the SGA-4 Zone's built form requirements for the tallest tower heights. The assembly's dual street frontage provides flexibility for access and street fronting

design.

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SHAPING GREAT COMMUNITIES

March 10, 2025

City of Kitchener
Planning Division, 6th Floor
200 King Street West
Kitchener, Ontario
N2G 4G7

Attention: Adam Clark and Elyssa Pompa; Growing Together East Project Team

**Re: Planning Commentary – Growing Together East
City of Kitchener**

On behalf of LGA Architectural Partners (“LGA”) and Waterloo Region Housing (“WRH”), GSP Group Inc. is pleased to provide comments regarding the City of Kitchener’s Growing Together East initiative. Our comments apply to WRH’s property located at 1050-1064 Courtland Avenue East and 440-470 Shelley Drive (the “Site”). We thank City staff for their time meeting to discuss the Site’s inclusion in Growing Together East on February 28, 2025.

The Site is located within the Major Transit Station Area (“MTSA”) for the Block Line iON LRT station. As part of Growing Together East, we have reviewed the proposed draft land use designation and zoning for the Site. For the Site, the draft land use is proposed to be ‘Strategic Growth Area A’ (“SGA-A”) and the proposed zoning is ‘Strategic Growth Area 2’ (“SGA-2”). The SGA-A land use designation and associated draft SGA-2 zone permit a maximum building height of eight (8) storeys.

As part of WRH’s Master Plan (2019), a revitalization strategy was created for existing properties with high community housing waiting lists, including the Site. WRH has established that a redevelopment scheme shall have a total of at least 192 residential units built on the Shelley Drive portion of the Site (Part 2). LGA has prepared preliminary site plan diagram on Part 2 of the Site for WRH. This includes a 9 and 10-storey apartment building sharing a common podium (attached).

In considering the development of context-sensitive affordable housing within the MTSA’s of Growing Together East, we are requesting designating the Site as ‘Strategic Growth Area B’ (“SGA-B”) and zoning the Site ‘Strategic Growth Area 3’ (“SGA-3”). The SGA-B land use designation and SGA-3 zoning would permit the proposed WRH redevelopment’s height of up to 10 storeys.

We have evaluated WRH’s proposed redevelopment concept to Policy 15.D.2.5 in the City’s Official Plan. The siting of the proposed 9 and 10-storey apartment buildings was made to accommodate the rise in grade while maximizing the setback to the existing low-rise residential on Hillmount Street to at least 32 metres. Building into the grade will allow for

some parking to be included below grade of the buildings. The adjacent properties to the south site include an existing 10-storey apartment building on and a commercial shopping centre, both on Courtland Avenue East. These adjacent properties are both proposed through Growing Together East to be designated 'Strategic Growth Area C' ("SGA-C") and zoned SGA-3. It is noted the current R-9 zoning for the Site (Zoning By-law 85-1) permits a maximum floor space ratio ("FSR") of 4.0, which would permit the proposed apartment's built-form including a height of 9-10 storeys. Environmental impacts that can be created by taller buildings will be accommodated and confirmed through detailed design. For the adjacent properties to the north on Hillmount Street, this includes accommodating a 45-degree angular plane to the rear lot line, minimal to no shadow impacts in March, June and September, and enhancing existing landscape buffers along the lot line. The lot area of Part 2 of the Site can accommodate the redevelopment and not compromise intensification efforts within an MTSA. The Site has no cultural heritage resources. During detail design, the Region will be consulted to confirm the proposed building height conforms to Airport Zoning Regulations ("AZR").


The SGA-3 zone would provide opportunity to modestly increase the proposed building height envisioned in Growing Together East, which is essential to advance the development of at least 192 affordable housing units on the Site. The Courtland-Shelley WRH redevelopment is designed with a mix of affordability and density in mind, and as such, the SGA-B designation and SGA-3 zone would allow for a more appropriate scale of development and transition to surrounding uses to meet the evolving and growing demands experienced by WRH.

We understand that concerns regarding maximum height on the Site may arise. WRH is not seeking to develop the Site to the maximum height allowance of 28 storeys permitted within the SGA-B designation and SGA-3 zone. If necessary, we are willing to consider a site-specific height limit of 10 storeys to facilitate the proposed redevelopment, which would still align with the overall Growing Together East goals while still allowing for the necessary density and housing affordability.

We believe that this request to Growing Together East offers a balanced solution that addresses both the significant need for affordable housing and achieving an appropriate scale and transition to established built-up areas of the City. We are committed to working closely with the Growing Together East project team to ensure redevelopment of the Site aligns with the vision to encourage and facilitate responsible growth within the MTSA's along the iON Rapid Transit line.

We trust the above comments are sufficient for your review and consideration in the final report. Please don't hesitate to contact us if you have any questions.

Yours truly,
GSP Group Inc.



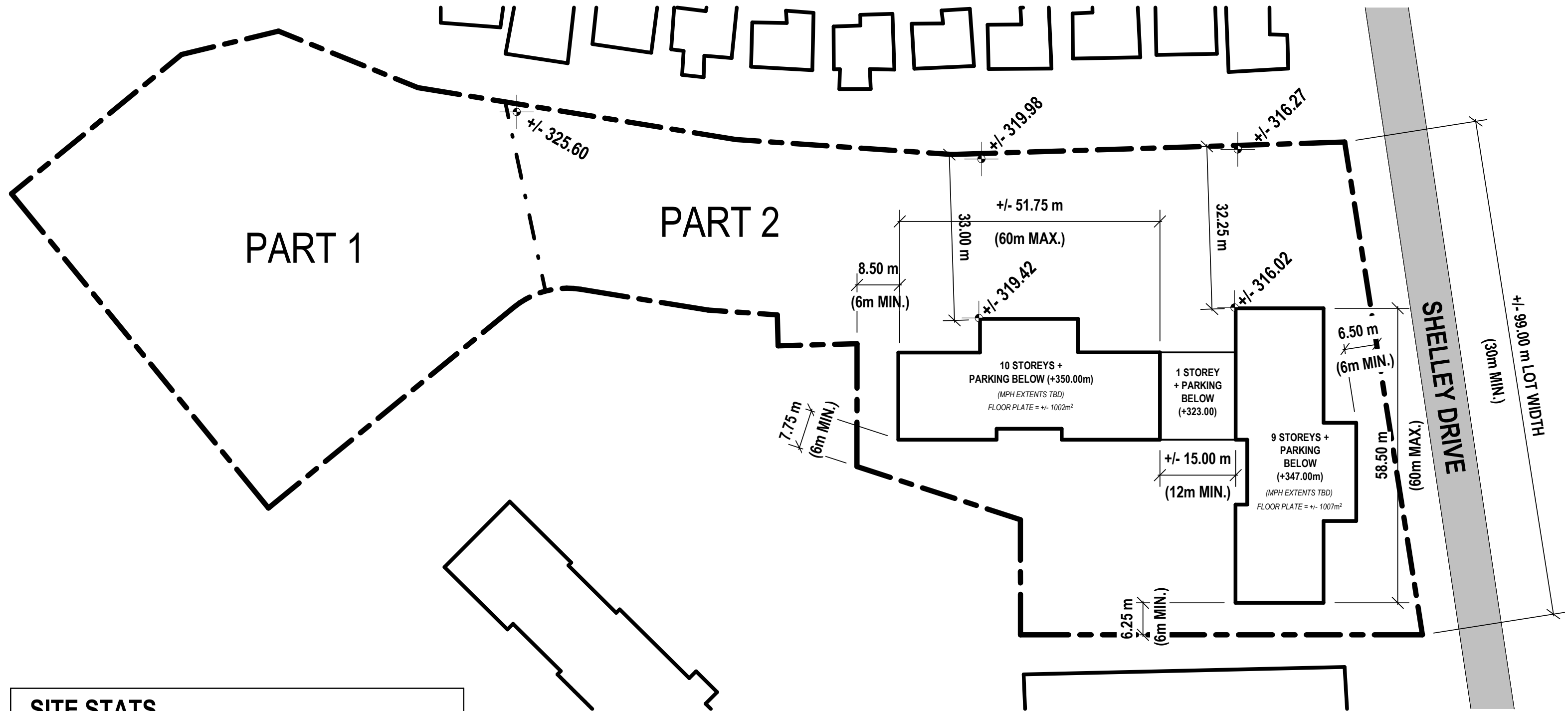
Michael Wittmer, MCIP, RPP
Senior Planner



Michael Serra, BEDP, CPT
Planner

Attach.

cc: Jeffrey Schumacher (Region of Waterloo), Kevin Martin (LGA Associates)



SITE STATS
LOT SIZE: +/- 17,474.75m ²
PART ONE: +/- 5,911.95m ²
PART TWO: +/- 11,526.89m ²
PROPOSED FSR (PART 2): +/-1.93m ²

From:

Subject:

Date:

Attachments:

[REDACTED]
Growing Together East Comments - WRH Redevelopment Project - Shelley Drive

Monday, March 10, 2025 12:57:00 PM

[image001.png](#)

[image002.png](#)

[image003.png](#)

[Courtland Shelley WRH Growing Together East Comments March 10 2025.pdf](#)

You don't often get email from [REDACTED] [why this is important](#)

Good afternoon Adam and Elyssa,

Attached, please find our comments on Growing Together East as it applies to Waterloo Region Housing's Shelley Drive Site.

Thanks again for meeting with us to discuss this project on February 28. Please don't hesitate to contact myself or Michael Serra of our office if you have any questions.

Best regards,

Mike



PLANNING | URBAN DESIGN
LANDSCAPE ARCHITECTURE



This communication is intended solely for the named addressee(s) and may contain information that is privileged, confidential, protected or otherwise exempt from disclosure. If you are not the intended recipient of this communication, please advise us immediately and delete this email without reading, copying or forwarding it to anyone.

From: [Growing Together \(SM\)](#)
To: [Jason Lambropoulos](#); [Natalie Goss](#); [Growing Together \(SM\)](#)
Cc: [REDACTED]
Subject: RE: Kitchener "Growing Together East" OPA/ZBA - Build Waterloo Region comments
Date: Thursday, December 19, 2024 4:02:56 PM

Good afternoon Jason,

Thank you for your comments & submission on the draft Growing Together East materials. Our team is continuing to review your submission and we would be happy to meet starting in February once we have a draft Official Plan and Zoning By-law Amendment available for review, alongside refined mapping.

As it relates to the comment regarding the Block Line TPSS, thank you for flagging this. We will review the applicable detailed land use designation as part of our refinements to the OPA / ZBLA.

As it relates to the comment regarding the Courtland & Shelley property, we'd be happy to further discuss with your team. Our [project webpage](#) outlines the criteria for all landowners which apply to requests to change the draft land use and zoning. The purpose of these criteria is to be consistent throughout the Study Area and to confirm that suggested changes function properly on the site and against the policy framework. The criteria for landowners (additional italicized notes for your consideration) includes:

- Proof of lot ownership – *satisfied as this is Regional property*
- A conceptual design that demonstrates compliance with the desired zone and refers to the [zone standards approved through Growing Together West](#) – *this may be satisfied through concepts that were prepared for discussions with staff already, as noted in the letter*
- A scoped planning justification addressing [Official Plan Policy 15.D.2.5](#), which requires:
 - demonstration of compatibility with the planned function of the lands and adjacent lands;
 - suitability of the lot for the proposed use or built form;
 - lot consolidation;
 - compliance with Kitchener's Urban Design Manual and Official Plan urban design policies; and
 - consideration of cultural heritage resources.

Appreciate your team's review of this file at this juncture of the project. We will be in touch in the new year and continue to engage with Development & Sustainability Services on other Regional comments.

Thanks,

Matt.

on behalf of the Growing Together East Project Team

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

NEW 519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: Jason Lambropoulos <jlambropoulos@regionofwaterloo.ca>

Sent: Friday, December 13, 2024 2:54 PM

To: Natalie Goss <Natalie.Goss@kitchener.ca>; Growing Together (SM)

<GrowingTogether@kitchener.ca>

[REDACTED]

Subject: Kitchener 'Growing Together East' OPA/ZBA - Build Waterloo Region comments

You don't [REDACTED]. [Learn why this is important](#)

Hi Natalie,

I am emailing on behalf of the Build Waterloo Region team at the Region of Waterloo to provide our commentary and feedback regarding the proposed draft OPA/ZBA being contemplated by the City of Kitchener for the remaining three MTSA's (Block Line, Fairway and Sportsworld areas) that form the second stage of the City's 'Growing Together' strategy. The Region had previously provided feedback regarding the 'Growing Together West' stage on behalf of the land portfolio team raising site-specific considerations for Region-owned land.

Please see attached our comments regarding the proposed rezoning under Growing Together East, with specific feedback regarding Region-owned land within the Block Line MTSA.

In general, we are supportive of the proposed OPA/ZBA as it applies to the locality and commend the City's Policy and Research team in this initiative and winning the 2024 OPPI PlanON Project of the Year.

Please feel free to give myself or Ashley Graham in our team a call or an email if you have any questions. We would appreciate the opportunity to discuss our feedback in the new year during the next phase of site-specific consultation.

Kind regards,

Jason Lambropoulos MSc Spatial Planning, BPlan

[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Confidentiality Notice: This email correspondence (including any attachments) may contain information which is confidential and/or exempt from disclosure under applicable law, and is intended only for the use of the designated recipient(s) listed above. Any unauthorized use or disclosure is strictly prohibited. If you are not the intended recipient, or have otherwise received this message by mistake, please notify the sender by replying via email, and destroy all copies of this original correspondence (including any attachments). Thank you for your cooperation.

12 December 2024

City of Kitchener
Planning Division
200 King Street West
City of Kitchener



Sent via Email: Natalie Goss, Manager Policy
Natalie.Goss@kitchener.ca
growingtogether@kitchener.ca

Dear Growing Together Team,

**Re: Comments from Build Waterloo Region (Region of Waterloo)
City of Kitchener Strategic Growth Area (SGA) Zoning – Growing Together East**

The Region of Waterloo provides this letter in its role as a landowner in response to the request for comments on the newly proposed Strategic Growth Areas (SGA) zoning for the 'Growing Together East' stage of the City of Kitchener's updated planning framework for Major Transit Station Areas (MTSAs).

The Region's Build Waterloo Region team has examined the draft land use and zoning maps on all regionally-owned sites within the Growing Together East boundaries , and request your clarification and consideration of the points enclosed.

The Region-owned properties that would be affected by the proposed draft zoning and land use reform are detailed in the following table, including their existing use, existing zoning and proposed zoning:

Site Address	Current Use	Current Zoning bylaw 85-1	Proposed Growing Together East SGA
440 Shelley Drive	Waterloo Region Housing	R-9 <i>*No height control, Max. 4.0 FSR</i>	Proposed SGA-2 zoning <i>*Mid-rise 8 storeys, mix of residential and non-residential uses</i>
1050 Courtland Avenue East	Waterloo Region Housing	R-9 <i>*No height control, Max. 4.0 FSR</i>	Proposed SGA-2 zoning <i>*Mid-rise 8 storeys, mix of residential and non-residential uses</i>
1605 Block Line Road (Block Line TPSS Property)	Transit	M-2 1R	Proposed OSR-1 and OSR-2 zoning <i>*Only cemeteries, community facilities, outdoor active recreation, outdoor passive recreation and stormwater management facilities permitted in these zones.</i>
512-524 Greenfield Avenue	Waterloo Region Housing	R-6 <i>*Max 10.5m height (Approx. 3 storeys)</i>	Proposed SGA-2 zoning <i>*Mid-rise 8 storeys, mix of residential and non-residential uses</i>
595 Greenfield Avenue	Waterloo Region Housing	R-6 <i>*Max 10.5m height (Approx. 3 storeys)</i>	Proposed SGA-3 zoning <i>*High density Mid- and High-rise 25 storeys, wide mix of residential and non-residential uses</i>

300 Fairway Road South (Fairway Road Transit Hub)	Transit	C-5 16R	Proposed SGA-4 zoning <i>*High density Mid- and High-rise, wide mix of residential and non-residential uses - No height limit</i>
445 Wilson Avenue (Wilson Avenue TPSS Property)	Transit	P-2	Proposed SGA-4 zoning <i>*High density Mid- and High-rise, wide mix of residential and non-residential uses - No height limit</i>

The proposed rezoning, as it applies to Region-owned properties, is generally supported. Notwithstanding, our review of the Growing Together East strategy has raised some site-specific matters and we seek the City of Kitchener's consideration for alterations to the proposed draft zoning to address these concerns.

We thank the City of Kitchener for the opportunity to provide comment, and summarise our request for site-specific considerations as follows:

Site Specific Matters

1. **440 Shelley Drive & 1050 Courtland Avenue East** currently contains two storey townhouse development operated by Waterloo Region Housing and is proposed to be zoned SGA-2 Mid-Rise which contemplates a height of 8 storeys and a mixture of uses as a transitional zone between existing low-rise neighbourhoods further away from LRT stops. The land is currently subject to Zoning By-law 85-1 and is zoned R-9 which permits a maximum FSR of 4.0, with no maximum height control. *Multiple Dwelling* is a permitted land use in this zone.



We request consideration for these properties to be zoned SGA-3 'High-rise limited' with an anticipated height limit of 25 storeys consistent with that proposed for the adjoining land south of the site at the intersection of Shelley Drive and Courtland Avenue. The proposed SGA-2 zoning presents a reduced overall density for this property compared to its current zoning which permits a maximum FSR of 4.0, potentially impacting housing densities under future Waterloo Region Housing development and resulting in future Official Plan and/or Zoning By-law amendments.

The site is within 130m walking distance via accessible path of travel at the pedestrian crossing at Block Line Road to the Block Line LRT station and is adjacent to a proposed SGA-4 zone opposite Courtland Avenue East, which has previously been contemplated for 30-38 storey mixed-use tower development. An increased density for the site to permit up to 25 storeys under SGA-3 zoning would be a more appropriate planning response for the land given its level of public transit service and through-site frontage to both Courtland Avenue and Shelley Avenue. Further, an increased height for the site would not result in a conflict with the Waterloo Airport Zoning Regulations with respect to its 'Takeoff Approach' area.

The SGA-3 zone includes transitional setback and height controls for development that borders lower densities. The SGA-3 zoning of this site would be able to accommodate sensitive forms of increased density under the setback and transition controls of the Draft ZBA, ensuring future built forms relate appropriately to the anticipated SGA-1 zone and existing low-density neighbourhood to the north with respect to bulk and scale, amenity impacts, and visual separation.

Finally, Waterloo Region Housing and the City of Kitchener have previously held initial consultation for the redevelopment of the eastern portion of the site fronting Shelley Street with concepts at a maximum height of 10-11 storeys discussed. The proposed zoning of SGA-2 for the site would potentially compromise this envisioned density for the site which would incorporate affordable housing, noting the Region is anticipating bringing forward an application for development of the Shelley site in the first half of 2025.

Comment: Build Waterloo Region seeks an increase in height for this site through its designation as an SGA-3 zone to permit a height up to 25 storeys on the land. The zone regulations for the SGA-3 zone include built form controls for 'transitions' to low-rise zones of a 20m building height within 15m of an SGA-1 zone, and yard setback of 7.5m from the SGA-1 zone. These controls would be suitable for this site and allow for the distribution of density across the site from 25 storeys at its southern portion to approximately 6 storeys at its northern portion, with the resultant zoning depicted below:



2. 1605 Block Line Road (Block Line TPSS Property) within the SGA boundary is currently zoned M-2 (Manufacturing) and contains an electrical substation asset ancillary to the LRT, and is proposed to be zoned OSR-1 and OSR-2 being open space zones.

Comment: The proposed zoning of this site may compromise the future maintenance or development of the substation asset and the Build Waterloo Region team wishes to confirm that the ongoing use of this site would be permitted under the open space zones, or if a more suitable zoning for this land should be considered to support the continued use of this site under the Growing Together East reform.

Conclusion

We trust the above provides a summary of the relevant planning changes that will apply to Region-owned properties within the Growing Together East SGA boundaries. Build Waterloo Region would appreciate the opportunity to discuss the above matters with City of Kitchener staff through their Growing Together initiative.

We look forward to meeting with City staff to continue to discuss the above comments as they relate to Regional properties, and work together on a vision for these properties.

We thank you for your time and consideration with these comments.

Yours truly,



Jason Lambropoulos

Senior Development Planner, MSc Spatial Planning, BPlan
Build Waterloo Region (Region of Waterloo)

cc.

Rod Regier, Commissioner PDLS
Danielle De Fields, Director of Regional Growth, Development and Sustainability Services
Matthew Chandy, Director Build Waterloo Region
Ryan Pettipiere, Director of Housing Services
Jeffrey Schumacher, Manager Affordable Housing Development
Tom Penwarden, Manager Real Estate Services
Matthew O'Neill, Manager Rapid Transit Coordination
Will Towns, Senior Planner Regional Growth, Development and Sustainability Services
Ashley Graham, Senior Development Planner, Build Waterloo Region
Yuri Langlois, Supervisor Urban Design, Build Waterloo Region
Josh Graham, Associate Director, Build Waterloo Region

From:

Subject:

Date:

RE: Kitchener "Growing Together East" OPA/ZBA - Build Waterloo Region comments
Monday, March 3, 2025 2:42:03 PM

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Hi Matt,

Thank you so much for your response last year and time spent in reviewing our initial submission. Hope you have had a good start to the New Year, and are enjoying this turn around in weather.

Following receipt of your email last year, the Build Waterloo Region team at the Region of Waterloo has been preparing the information requested by the Growing Together team including the scoped planning justification, conceptual designs for the sites, and our assessment of the requested changes to the SGA land use and zoning against the City's Official Plan Policy 15.D.2.5.

We are looking to get the additional information over to your team in short order so that we can hopefully further discuss the proposed draft land use designation and zoning for the properties at 440 Shelley Avenue and 1050 Courtland Avenue East.

We appreciate your collaboration in this matter and look forward to continuing the discussion soon once we send across our response.

Kind regards,

From: Growing Together (SM) <GrowingTogether@kitchener.ca>

Sent: December 19, 2024 4:03 PM

[REDACTED]

Subject: RE: Kitchener 'Growing Together East' OPA/ZBA - Build Waterloo Region comments

Some people who received this message don't often get email from growingtogether@kitchener.ca. [Learn why this is important](#)

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Good afternoon Jason,

Thank you for your comments & submission on the draft Growing Together East materials. Our team is continuing to review your submission and we would be happy to meet starting in February once we have a draft Official Plan and Zoning By-law Amendment available for review, alongside refined mapping.

As it relates to the comment regarding the Block Line TPSS, thank you for flagging this. We will review the applicable detailed land use designation as part of our refinements to the OPA / ZBLA.

As it relates to the comment regarding the Courtland & Shelley property, we'd be happy to further discuss with your team. Our [project webpage](#) outlines the criteria for all landowners which apply to requests to change the draft land use and zoning. The purpose of these criteria is to be consistent throughout the Study Area and to confirm that suggested changes function properly on the site and against the policy framework. The criteria for landowners (additional italicized notes for your consideration) includes:

- Proof of lot ownership – *satisfied as this is Regional property*
- A conceptual design that demonstrates compliance with the desired zone and refers to the [zone standards approved through Growing Together West](#) – *this may be satisfied through concepts that were prepared for discussions with staff already, as noted in the letter*
- A scoped planning justification addressing [Official Plan Policy 15.D.2.5](#), which requires:
 - demonstration of compatibility with the planned function of the lands and adjacent lands;
 - suitability of the lot for the proposed use or built form;
 - lot consolidation;
 - compliance with Kitchener's Urban Design Manual and Official Plan urban design policies; and
 - consideration of cultural heritage resources.

Appreciate your team's review of this file at this juncture of the project. We will be in touch in the new year and continue to engage with Development & Sustainability Services on other Regional comments.

Thanks,

Matt.

Community Development
The City of Cambridge

February 28, 2025

SENT VIA ELECTRONIC MAIL

City of Kitchener
200 King Street West
Kitchener, ON N2G 4G7

Email: GrowingTogether@kitchener.ca

Re: Growing Together East project

In response to the City of Kitchener's request for feedback on their Growing Together East project, the City of Cambridge would like to offer the following feedback.

The City of Kitchener plans to introduce a Holding (H) provision on properties directing sanitary flows to Cambridge, as per a 2012 cross-border servicing agreement (CBSA). Despite the CBSA being executed in a relatively recent time-frame, the agreement is basic in nature and does not specify flow rates, land-use changes, or cost contributions for upgrades.

While the H is a good tool to identify to developers that there may be capacity issues in this area, Cambridge is concerned about increases in sanitary flows that this plan will present and that are not disclosed within the Growing Together East Draft Policies and Zoning Regulations Brief.

Before agreeing to accept sanitary flows (ie lifting the H) on any proposed developments in this area, the City of Cambridge would need a comprehensive sanitary capacity analysis and a plan to complete any necessary upgrades to infrastructure. Both the analysis work and any necessary upgrades to Cambridge infrastructure require the development of a cost-sharing agreement between Kitchener and Cambridge.

Cambridge understands that Kitchener might consider this option for sanitary servicing. However, it's expected that all opportunities to route sanitary flows within Kitchener be reviewed and ruled out first.

Furthermore, this infrastructure will be accommodating sanitary flows from a planned growth intensification area in Preston (MTSA), the City of Cambridge would prioritize this growth area over other municipalities.

In summary, the City of Cambridge is supportive of the H provision proposed but would recommend additional transparency within the zoning regulations brief to manage the expectations of potential developers.

Yours truly,



Leah Walter, P.Eng., C.E.T.
Director of Engineering and Transportation

From:

Subject:

Response to Growing Together East Project

Date:

Friday, February 28, 2025 3:56:47 PM

Attachments:

[cityofcambridgelogo_3bd247c5-9b79-4597-978f-1686babdf80.png](#)
[Response to Growing Together East Project.pdf](#)

You don't often get email from benevidesl@cambridge.ca. [Learn why this is important](#)

Good afternoon,

Please see the attached letter from Leah Walter, Director of Engineering and Transportation for the City of Cambridge.

Thank you,

Lynn Benevides
Administrative Assistant II



[City of Cambridge](#) • [City Hall](#) • [50 Dickson St](#) • [Cambridge](#) • [ON](#) • [N1R 1S8](#) • [PO Box 669](#)

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February 28, 2025

sent via email

Policy and Research, Planning Division
City of Kitchener
200 King Street West
Kitchener, ON
N2G 4V6

Attention: Natalie Goss, Manager, Policy and Research

**RE: City of Kitchener Growing Together East
 Official Plan Amendment and Zoning By-law Amendment
 Public Open House (February 2025 Draft)
 Preliminary Comments on Behalf of Canadian Tire Properties Inc. and
 Canadian Tire Real Estate Limited
 Kitchener, ON**

Our File: [REDACTED]

Zelinka Priamo Ltd. are the planning consultants for Canadian Tire Properties Inc. ("CT") and Canadian Tire Real Estate Limited ("CTREL") for the City of Kitchener Growing Together East Official Plan Amendment and Zoning By-law Amendment. CT is the owner of lands known municipally as 385 Fairway Road South (the "subject lands"), which are developed for a shopping centre including a Canadian Tire retail store with an accessory automotive repair establishment and garden centre (CTREL being a tenant); various medical and dental clinics; and office uses. Stand-alone buildings on the subject lands are developed for a Farm Boy food store and a restaurant.

On behalf of CT and CTREL, we have been monitoring the City's Strategic Growth Area policy and regulatory framework updates. It is our understanding that draft Official Plan policies and zoning provisions, dated February 2025, with associated Draft Schedules were released for review. It is our understanding from Staff Report DSD-2024-237, dated May 30, 2024, and the Council Meeting on June 24, 2024, that Council directed Staff to bring a final version of the land use and zoning framework for the Growing Together East Study Area to Council for its consideration, after consulting with the public and interested parties. Based upon our review of the February 2025 draft Official Plan policies and zoning regulations, on behalf of CT and CTREL we have preliminary comments as outlined below. We will continue to review the February 2025 draft materials in more detail and may provide further comments, as required.

[REDACTED]
[REDACTED]

BACKGROUND

The subject lands are currently designated in the City of Kitchener Official Plan as follows:

- According to Map 1 – Urban Area and Countryside, the subject lands are designated “Urban Area”;
- According to Map 2 – Urban Structure, the subject lands are designated “Protected Major Transit Station Area”;
- According to Map 3 – Land Use, the subject lands are designated as “Mixed Use”; and,
- According to Map 4 – Protected Major Transit Station Areas and Urban Growth Centre, the subject lands are identified as a “Protected Major Transit Station Area”.

The subject lands are currently zoned in the City of Kitchener Zoning By-law No. 85-1 (“ZBL”) as “Commercial Campus (C-8 297R, 298R, 112U)”.

In general, at this time, CT and CTREL do not have specific plans for the redevelopment of the subject lands, and are seeking to maintain existing operations while allowing for short- and medium-term modest infill or expansion to respond to changing market demands. Further, it is also our intent to consider and protect for potential redevelopment scenarios, should this be contemplated in the future.

CITY OF KITCHENER GROWING TOGETHER EAST OFFICIAL PLAN AMENDMENT (“OPA”)

Based upon our review of the February 2025 Draft Official Plan policies and Schedules, “Strategic Growth Area C” on Map 3 – Land Use is to be proposed for the subject lands.

Our preliminary comments for the February 2025 Draft Official Plan policies are as follows:

- As a general comment, the Draft OPA is lacking with respect to interim development permissions. While the “Strategic Growth Area” preamble recognizes that building heights should be restricted as an interim measure, no other policies speak to interim uses or small-scale redevelopment. **In our submission, it is essential that the Draft OPA add a policy to allow for interim development, including modest expansion and infill development. The comprehensive redevelopment of lands within Major Transit Station Areas will likely take years or decades to fully realize the contemplated vision and scale. In the interim, and until redevelopment is realized, the viability of existing lands and buildings should be protected since there are policies that speak to continued commercial viability (Policy 15.D.2.4). We suggest that interim development policies be incorporated into the Draft OPA, which would recognize existing uses and permit expansion or infill development that is in accordance with the exiting policy framework, and that does not necessarily realize the vision for comprehensive redevelopment;**
- Draft Non-Residential Policy 2(b) states “Where development is proposed to proceed in phases or is required to address coordination between landowners, a phasing plan will be required as part of a complete application which demonstrates how the development will prioritize development on surface parking lots and portions of the lot abutting priority

streets as part of the first phase of development.” **In our submission, we suggest the use of “and” should be replaced with “or” before “portions of the lot ...” in order to provide flexibility to prioritize development locations in earlier phases of redevelopment while considering site context and operational aspects of surrounding uses; and,**

- Draft Non-Residential Policy 4(b) states “Where a development application proposes to reduce the existing non-residential gross floor area, a Commercial Justification Study will be required as part of a complete application which addresses: within the Fairway and Sportsworld PMTSAs, that the future on-site and local populations are adequately served and that regionally significant non-residential uses are not diminished.” **In our submission, this policy should be revised to provide clarification on the conditions requiring a Commercial Justification Study. It is unclear from this policy whether the study would be applicable due to a reduction of existing non-residential gross floor area to a single building, or to an entire site. In addition, in our submission “will” should be changed to “may”, as the need for a Commercial Justification Study may not be appropriate under all circumstances.**

CITY OF KITCHENER GROWING TOGETHER EAST ZONING BY-LAW AMENDMENT (“ZBA”)

Based on our review of the February 2025 Draft Zoning Provisions and Schedules, the subject lands are to have their current zoning repealed and replaced with the “*Strategic Growth Area 4*” zone category in Appendix A – Schedules of Zoning By-law 2019-051. The addition of Fairway Road South to Appendix G – Priority Streets would also apply specific provisions to the subject lands.

- As stated above, OP Policy 15.D.2.4 states “The Urban Growth Centre (Downtown) and Protected Major Transit Station Areas will be planned for continued commercial viability and all other land use designations allowing commercial development will have regard for and in no way compromise this planned function of the Urban Growth Centre (Downtown) and Protected Major Transit Station Areas.” **Consistent with our comments regarding the draft OP policies, the ZBA should propose a provision to allow for interim development permissions to recognize legally existing commercial uses as a permitted use, and facilitate reasonable expansion, renovation, change in use, or infill development until comprehensive redevelopment is contemplated;**
- Section 6 – Strategic Growth Area Zones (SGA) is intended to replace the existing zoning on the subject lands. Section 6.2 – Permitted Uses, lists a range of residential, home occupation, community, commercial, and creative industry uses; however, uses which are currently operational on the subject lands are not carried over. **In our submission, we request that a site-specific provision be considered for the subject lands to recognize the existing uses to support their continued operation and allow for modest expansion or addition. These uses, specifically being an Automotive Repair Operation and Garden Centre, would not adversely impact the ability for a transition to more sensitive uses in the short- to medium-term, and would support the continued commercial viability of the subject lands (per OP Policy 15.D.2.4);**

- The Draft ZBA Table 6-3 proposes a minimum floor space ratio of 0.6 for non-residential buildings. Conversely, OP policy 15.D.2.69 states “a minimum Floor Space Ratio of 2.0 will apply to all development and redevelopment. The implementing zoning may contain *transition regulations* to facilitate and permit lands to ultimately meet the minimum Floor Space Ratio requirements.” **In our submission, the minimum floor space ratio for large commercial developments may be difficult to provide, and suggest that a revised minimum floor space ratio be considered, in particular for non-residential buildings;**
- The Draft ZBA Table 6-3 proposes a maximum building length for non-residential buildings of 36m. While building length is a regulation that may be identified in the implementing Zoning By-law (per OP Policy 15.D.2.6), this provision is restrictive and inappropriate for non-residential use buildings. **In our submission, we request clarity as to the intent of the proposed regulation. We note that in Table 6-5, there is no regulation for a maximum building length for the entire building being 5-storeys or greater. This provision for a maximum building length of 36m for a non-residential building of 4-storeys or less is highly restrictive for existing commercial buildings, and limits opportunities for expansion or addition to existing retail operations;**
- Draft ZBA Table 6-3 proposes a regulation requiring a minimum street line façade opening of 20% for non-residential buildings. **In our submission, there are numerous circumstances for commercial development that may be restricted by this regulation. We suggest that this provision be reconsidered for non-residential buildings where it may not be appropriate to provide a significant street line façade opening;**
- OP Policy 15.D.2.7 states that “large scale developments will be expected to provide appropriate landscaping in accordance with the City’s Urban Design Manual through the Site Plan Control process.” Draft ZBA Table 6-3 proposes a minimum landscaped area of 30%, and a minimum rear yard landscaped area of 40%. **These proposed regulations are generally appropriate for mixed-use or residential developments, where residents will require amenity space. However, these regulations are excessive for commercial developments. Flexibility should be afforded to these provisions for non-residential buildings to account for existing circumstances, consistent with the OP policies. Furthermore, “rear yard landscaped area” is not a defined term in the ZBL, and as such, we suggest removing this regulation; and,**
- Draft Section 6.6 – Priority Streets relates to specific segments of roads that have additional regulations in the Zoning By-law. Draft Section 6.6(a)(i) states “a Community Use or Commercial Use listed in Table 6-1 shall occupy a minimum of 50% of the street line ground floor, excluding office and commercial parking facility.” Draft Section 6.6(a)(vi) states that “the minimum street line ground floor façade openings shall be 40%, measured between 0.5m and 4.5m above exterior finished grade along the entire width of the street line façade.” **In our submission, these regulations are restrictive and do not account for flexibility regarding site context and operational requirements. We recommend that these regulations be applicable only for new comprehensive redevelopment as opposed to modest expansion to existing buildings or commercial infill buildings.**

We would welcome the opportunity to meet with City staff to discuss our comments further.

We trust that the enclosed information is satisfactory. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours very truly,

ZELINKA PRIAMO LTD.

A handwritten signature in black ink, appearing to read 'Laura', with a stylized flourish at the end.

Laura Jamieson, B.Sc.
Intermediate Planner

cc. Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited (via email)

From: [REDACTED]
To: [Growing Together \(SM\)](#)
Cc: [Elyssa Pompa](#); [Adam Clark](#)
Subject: RE: Growing Together East
Date: Tuesday, November 26, 2024 10:37:15 AM

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

Hi Matt,

Thanks for the clarification. If I have any further questions, I will be in touch.

Best,

Laura Jamieson, B.Sc.
Intermediate Planner

Zelinka Priamo Ltd.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Growing Together (SM) <GrowingTogether@kitchener.ca>
Sent: November 26, 2024 10:23 AM
To: [REDACTED]
Cc: Elyssa Pompa <Elyssa.Pompa@kitchener.ca>; Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: Growing Together East

Good morning Laura,

Thanks for your email. The SGA zoning will be applied through a city-initiated zoning by-law amendment which will re-zone the properties within the Study Area to the new, applicable SGA zone category.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
NEW 519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]
Sent: Tuesday, November 26, 2024 9:50 AM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together East

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Good morning,

I am hoping to clarify how the SGA zoning will be applied to properties impacted by the Growing Together East changes. Will compound zoning be implemented, or will the properties be re-zoned completely?

Thank you,

Laura Jamieson, B.Sc.
Intermediate Planner

Zelinka Priamo Ltd.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From:

Subject:

Growing Together East - Preliminary Comments on Draft Materials

Date:

Friday, February 28, 2025 2:03:49 PM

Attachments:

[LTR - Comments on Behalf of CT - Kitchener SGA.pdf](#)

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Good afternoon,

On behalf of our clients, Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited, Zelinka Priamo Ltd. is pleased to submit preliminary comments on the draft policies and provisions related to the Growing Together East - Strategic Growth Area Amendments. You will find a letter with our comments attached to this email. **Please reply to confirm receipt.**

Please also ensure we are notified of any future meetings or decisions regarding the Growing Together initiatives. Should you require anything further, please do not hesitate to contact the undersigned.

Best regards,

Laura Jamieson, B.Sc.

Intermediate Planner

Zelinka Priamo Ltd.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



2025-02-21

City of Kitchener
200 King Street West
Kitchener, Ontario
N2G 4V6

Via email: GrowingTogether@kitchener.ca

Re: City of Kitchener Growing Together East Draft Land Use and Zoning

On behalf of Costco Wholesale Canada Ltd. (Costco), we are pleased to have this opportunity to participate in and provide comments on the City of Kitchener Growing Together East draft land use and zoning materials.

It is our understanding that the City is updating its land use policies as they pertain to land use regulations around major transit stations, to support the City's strategic growth initiatives, and that this is being undertaken in two phases: Phase 1 Growing Together West and Phase 2 Growing Together East. The Costco Kitchener warehouse membership club is located at 4438 King St. East (Subject Site), within the lands identified as part of the Phase 2 – Growing Together East plan.

We recognize that Waterloo Regional Council approved the Growing Together Official Plan amendments (OPA 49) on June 19, 2024, and that Kitchener City Council approved Zoning By-law Amendment 2024-065 to amend its existing By-law 2019-051. These amendments introduced new Strategic Growth Area (SGA) land use and zones and applied them to seven of Kitchener's ten Major Transit Station Areas (MTSAs) as part of the Phase 1 – Growing Together West initiative. The Phase 2 – Growing Together East initiative will update the planning framework for the three remaining MTSAs, including the Sportsworld MTSA lands, within which the Costco Kitchener warehouse is located.

We recognize and understand there is growing Provincial emphasis on promoting increased density in key areas within municipalities, including in proximity to MTSAs. Costco is currently working with several municipalities in Ontario, with an interest in ensuring its ability to continue current operations, expand and/or modify appropriately and, in the future potentially expand on site as part of a mixed use development.

[REDACTED]

In reviewing the materials made available for the Growing Together initiative, Costco has some concerns we would like to discuss regarding some of the SGA land use policies and zoning provisions as they would apply to the Costco Kitchener lands once the Phase 2 - Growing Together East Official Plan and Zoning By-law Amendments have been approved and adopted, including but not limited to permitted uses and applicable standards. We note the following:

Official Plan Land Use Designation

The Costco Kitchener lands are currently designated Commercial Campus per the City of Kitchener Official Plan, Map 3 – Land Use (Figure 1).

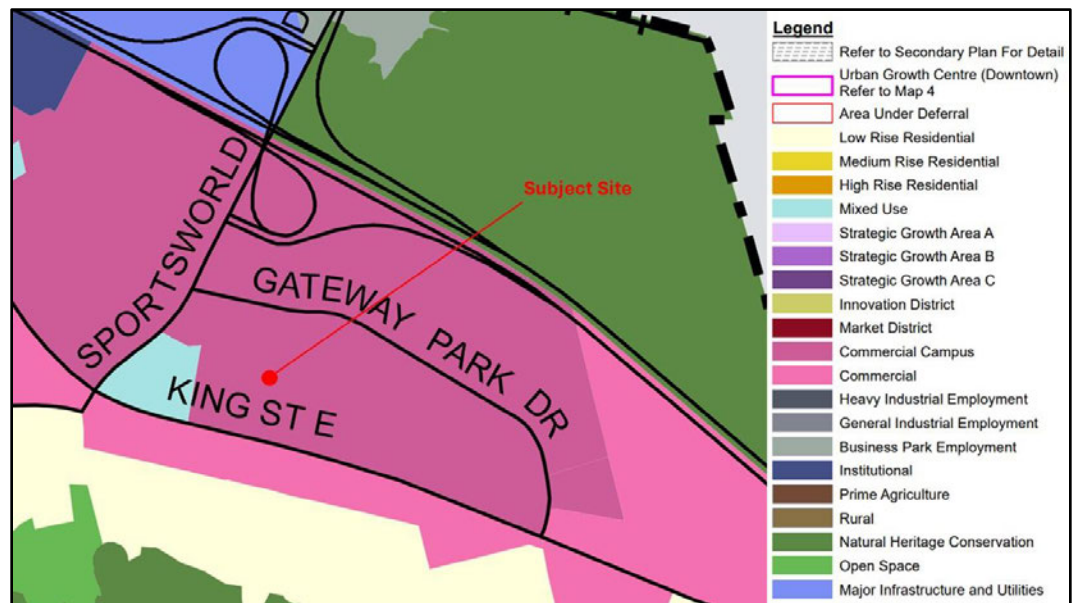


Figure 1: City of Kitchener Official Plan - Map 3 – Land Use (Extract)

Permitted uses within the Commercial Campus land use designation include among other uses, retail uses, auto service stations which may include car washes, gas stations and/or gas bars.

Per the Draft Land Use Map for the Growing Together East lands, the proposed land use designation for the Costco Kitchener lands is Strategic Growth Area C (SGA-C).

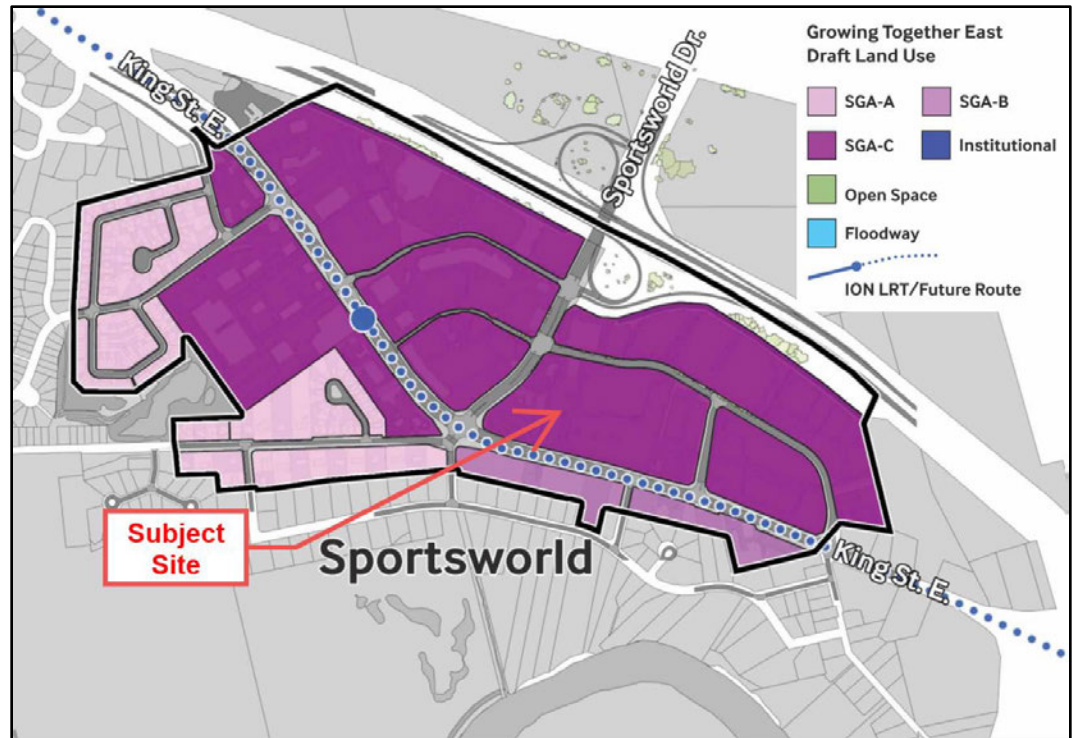


Figure 2: Growing Together East - Draft Land Use Map

Non-residential uses permitted include:

- a) compatible commercial uses such as, but not limited to, retail, commercial entertainment, restaurants, financial establishments, hotels, and light repair operations;
- b) personal services;
- c) office;
- d) exhibition and/or conference facilities;
- e) health-related uses such as health offices and health clinics;
- f) institutional uses such as hospitals, daycare facilities, religious institutions, community facilities, and educational establishments;
- g) social service establishment; and
- h) studio and artisan-related uses.

Unlike the Commercial Campus designation, auto service station uses including gas stations /gas bars, are not permitted within the SGA-C designation. While the Costco Kitchener site does not currently include a gas bar, should the proposed SGA-C land use designation be applied to the Subject Site, it is understood that an Official Plan Amendment would be required should Costco wish to add a gas bar to the warehouse site in the future.

Gas is considered a key service for Costco members. All new Costco warehouses, and many of the existing warehouses in Ontario already have ancillary gas bars. Costco has had previous discussions with municipal staff at the City of Kitchener about adding a gas bar to the existing site, and would like to maintain the ability to add an ancillary gas bar to the existing warehouse, and/or include gas as a part of a future onsite warehouse relocation in a mixed use development.

Zoning

The Costco Kitchener lands are currently zoned Commercial Campus (Site Specific Provision 28), COM-4 (28) per Schedule 289 of Zoning By-law 2019-051, as shown in Figure 3.

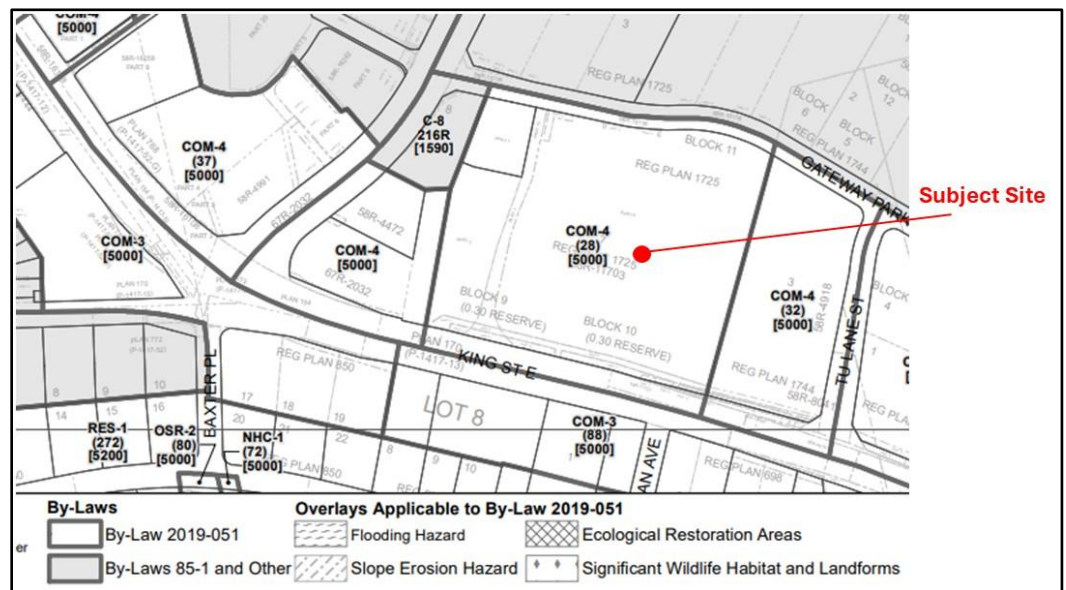


Figure 3: Extract from Schedule 289 of Zoning By-law 2019-051

The COM-4 zone accommodates a range of retail and commercial uses. Per Section 9.1 of Zoning By-law 2019-051, uses permitted within the COM-4(28) zone include: Automotive Detailing and Repair Operation, Car Wash, Drive-through Facility, Gas Station, Large Merchandise Retail, Manufacturing, Office, Retail, Propane Retail Outlet, and Warehouse. Site-Specific Provision 28 applicable to the Subject Site, permits an individual retail outlet with no minimum gross floor area.

The Growing Together East Draft Zoning Map shown in Figure 4 rezones the Subject Site to Strategic Growth Area 4 (SGA-4) per the

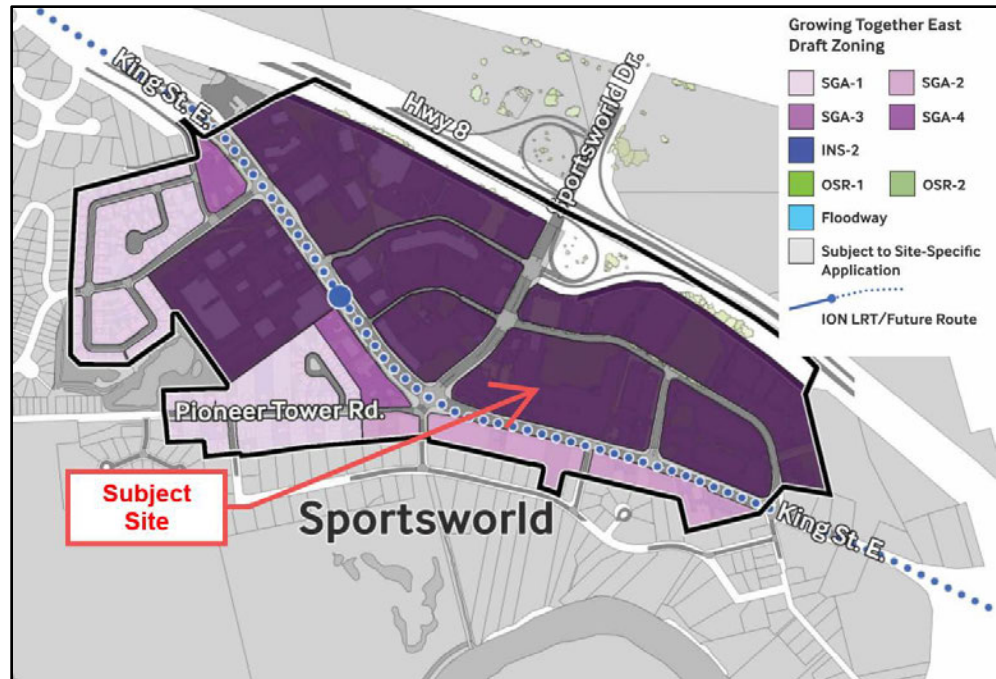


Figure 4: Draft Zone Mapping - Growing Together East

Permitted uses in the SGA-4 zone include but are not limited to residential uses, community uses (day care, elementary school, hospital, place of worship), commercial uses (retail, restaurant, office, commercial parking facility), creative industry uses (biotechnology establishment, research and development establishment). A gas station, defined in the Zoning By-law as the use of a premise for the retail of automotive fuel and other related products, is not included as a permitted use within an SGA-4 zone. Should Costco wish to introduce a gas bar on the site in the future, along with an OPA discussed previously, a Zoning By-law Amendment would be required.

It is also noted that a propane retail outlet is not a permitted use in the proposed SGA-4 zone. A Propane Retail Outlet is defined in Zoning By-law as the use of a premise where propane is sold in refillable cylinders, and/or is put into the fuel tanks of motor vehicles, or into portable containers with a capacity exceeding 0.5kg but not greater than 20kg. Based on this definition, it is interpreted that the existing propane facility located in the Costco parking area would be considered a propane retail outlet use. As a result, once the Costco Kitchener lands are rezoned to SGA-4, Costco could be considered a legal non-conforming use on account of its sale of propane.

Propane sales are available on nearly all Costco warehouse sites across Ontario. Costco would like to maintain and ability to provide a propane service to its members, and modify or expand the service as needed.

In reviewing zoning standards that would apply the Cosco Kitchener site, it is understood that the standards for an SGA-4 zone, introduced in Table 6-3 of Zoning By-law Amendment 2024-

065, would not apply to existing buildings and structures. However, it is not clear what standards would apply to the Subject Site once zoned SGA-4, if not the standards noted in Table 6-3.

Also, Table 5-5 of Zoning By-law Amendment 2024-065 establishes a much reduced maximum parking space per Gross Floor Area standard for lands zoned in an SGA category. The existing COM-4 zone standard establishes a maximum of 1 parking space per 24m² of GFA. By comparison, the standard that applies in an SGA zone is 1 parking space per 72m² of GFA. It is understood that, per provision 5.6b) of By-law Amendment 2024-065, on a lot with existing parking spaces that exceed the maximum number of parking spaces permitted through Table 5-5, the number of existing parking spaces will be the maximum number of parking spaces permitted. Currently the Costco Kitchener site has a total of 652 parking spaces. Costco has recently pre-consulted with the City of Kitchener to introduce additional parking through a purchase of land adjacent to the existing site. However, should Costco seek to add additional parking spaces through a future parking expansion, relief from zoning, potentially in the form of a zoning by-law amendment, would be required as the SGA parking standard would only permit a maximum of 210 parking spaces based on an existing site GFA of 15,071.30m².

In addition, it is not possible at this time to identify the GFA that would be associated with a potential onsite relocation of the warehouse in a mixed use development. However, Costco would want to ensure that an appropriate amount of parking could be provided to support such a relocation.

Conclusion

We understand that Staff will be offering one on one meetings with landowners beginning in February. We would like to request a meeting with City Planning Staff to discuss the aforementioned items discussed, as well as opportunities to protect Costco's current and future operations while ensuring opportunities for appropriate expansion and/or modifications.

We would like to thank you again for the opportunity to participate in the City of Kitchener Growing Together East project. We look forward meeting with you.

Yours very truly.

WSP CANADA INC.



Steven O.D. Gammon, MCIP, RPP
Senior Manager, Urban and Community Planning – Ontario

From: [REDACTED]
To: [Elyssa Pompa](#); [Matthew Rodrigues](#)
Cc: [Gammon, Steven](#); [Growing Together \(SM\)](#)
Subject: RE: Growing Together: New draft materials, public open house and staff office hours
Date: Monday, February 24, 2025 4:11:01 PM
Attachments: [image001.png](#)
[20250221- Growing Together East Costco Comment Letter.pdf](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Thanks very much, Elyssa.

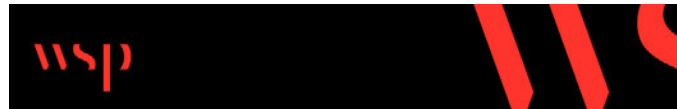
Our team has availability on Friday, 1:00 to 1:30, or between 3:00 and 4:00. Please let us know if any of these times still work for the City Staff.

Also, on behalf of Costco Wholesale Canada Ltd., we would like to submit the attached comment letter to inform our discussion.

Thanks again,
Kris

Kristopher Hall, MSc PI, MCIP, RPP
Manager, Urban and Community Planning

[REDACTED]



From: Elyssa Pompa <Elyssa.Pompa@kitchener.ca>
Sent: February 20, 2025 3:42 PM
To: [REDACTED]
[REDACTED]
Subject: RE: Growing Together: New draft materials, public open house and staff office hours

Hi Kris,

Staff are available to meet at the following times:

Tuesday February 25 from 1-4pm; or
Friday February 28 from 1-4pm

Let me know what works best for your team and if you prefer meeting in person at City Hall or virtually.

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: Thursday, February 20, 2025 3:29 PM
To: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Growing Together: New draft materials, public open house and staff office hours

Hi Kris,

Playing a little bit of telephone tag today – nice to hear from you!

We have good availability next week on Tuesday or Friday afternoon between 1-4pm. Let us know what might work for you in there. My colleague Elyssa will connect to schedule the meeting. If you have any materials you'd like to share in advance of the meeting, it will help us respond in real time, otherwise happy to discuss and receive comments afterwards. We are seeking written submissions by February 28.

Feel free to give me a call back (I'm in a meeting 4-4:30), otherwise looking forward to chatting next week.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

[REDACTED]

Subject: RE: Growing Together: New draft materials, public open house and staff office hours

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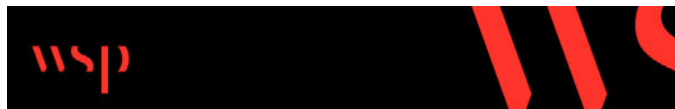
Hi Matt,

Just left you a voicemail but thought I'd follow that up with an email. Costco is interested in meeting with the City next week. Would you be able to let me know what availability the City still has left and I can take those dates/times and coordinate with Costco?

Thanks very much, Matt.
Kris

Kristopher Hall, MSc PI, MCIP, RPP
Manager, Urban and Community Planning

[REDACTED]



From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: February 19, 2025 12:16 PM

To: [REDACTED]

Subject: FW: Growing Together: New draft materials, public open house and staff office hours

Hi Steve, I wanted to just follow-up with you directly on this project following our conversation on the phone the other week. We have some availability remaining before February 28th if Costco was planning on making a submission and would like to meet.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: Matthew Rodrigues
Sent: Friday, February 7, 2025 3:30 PM
Cc: Growing Together (SM) <GrowingTogether@kitchener.ca>; Adam Clark <Adam.Clark@kitchener.ca>
Subject: FW: Growing Together: New draft materials, public open house and staff office hours

Good afternoon,

Thank you for your continued engagement on the Growing Together East project. Please see below an update from the Project Team.

Thank you,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca



We have an important update to share about [Growing Together East](#).

What we heard

We held a series of community engagement events in summer and early fall 2024. Overall, we heard there is broad support for growth and intensification within these station areas. Residents also said it's critical the City builds parks and open spaces, local retail and grocery, walkable streets, and community spaces to support that growth. A summary report, including the results from each event, is now available.

[Read the report](#)

Public open house

Planning staff will be hosting a public open house in the Conestoga Room located on the first floor of City Hall on February 26th, from 4:00pm - 7:00pm. Staff from the Growing Together East team will be available to take your questions and receive your comments.

Come and talk to us one-on-one about your property or give us your feedback on the things that matter to you!

This public open house also provides an opportunity for you to learn more about the proposed planning framework that will guide growth and change within Kitchener's Block Line, Fairway and Sportsworld Protected Major Transit Station Areas (PMTSAs).

Where: Conestoga Room, 1st Floor, Kitchener City Hall, 200 King St. W.

When: Wednesday, February 26th between 4:00pm and 7:00pm

You can also provide your questions and comments to us via email at GrowingTogether@kitchener.ca by **February 28, 2025**.

Draft materials

New draft materials are now available. This includes a Land Use and Zoning Brief with draft Official Plan Policies and Zoning By-law Regulations.

These policies and regulations are specific to the Block Line, Fairway and/or Sportsworld PMTSAs. They are in addition to those approved through the [Official Plan Policies \(primarily Section 15.D.2\)](#) and [Zoning By-law Regulations](#) that were part of [Growing Together West](#).

The **Land Use and Zoning Brief** contains critical information for landowners, developers and consultants. Please review it in detail.

[Read the Land Use and Zoning Brief](#)

Other materials in this update include:

- [Transportation Background and Methodology Memo](#)
- [Noise Study Background and Methodology Memo](#)
- [Market Study Background and Existing Conditions Memo](#)
- [Draft Priority Streets Map](#)
- [Draft Land Use Map](#)
- [Draft Zoning Map](#)

Staff Office Hours

Staff are available to meet with landowners to discuss property-specific requests. Interested landowners may book a 30-minute appointment on:

- Tuesday, Feb. 11 between 1 and 4 p.m.
- Thursday, Feb 13 between 1 and 4 p.m.
- Tuesday, Feb. 18 between 1 and 4 p.m.
- Thursday, Feb. 20 between 1 and 4 p.m.

To book, email us with your preferred dates and times at GrowingTogether@kitchener.ca.

Interested in making a submission on a property you own? **Please read the instructions below.**

Landowner submission requirements

Landowners within the Study Area can provide written submissions about specific properties. We can accept submissions until **February 28, 2025**.

Requests for site-specific changes must include materials that meet the following criteria:

- Proof of lot ownership
- A conceptual design that:
 - complies with the desired zone
 - refers to the [zone standards approved](#) through Growing Together West
- A scoped planning justification addressing [Official Plan](#) Policy 15.D.2.5 which requires:
 - a demonstration of compatibility with the planned function of the lands and adjacent lands
 - suitability of the lot for the proposed use or built form
 - lot consolidation
 - compliance with Kitchener's Urban Design Manual and Official Plan urban design policies
 - consideration of cultural heritage resources

Please note

These draft materials are not final. Continued dialogue with residents and industry and agency collaborators may result in changes. For example, this could include updates such as:

- applying holding provisions to individual properties where a record of site condition or a noise study is required
- changes based on the landowner submissions process
- new building height requirements in response to comments from the Region of Waterloo on behalf of the Region of Waterloo International Airport

Staff will consider all comments and submissions as part of our report to City Council in spring 2025.

Kind regards,

The project team

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From: [Jordan Vander Veen](#)
To: [Natalie Goss](#)
Cc: [Adam Clark](#)
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City
Date: Tuesday, March 11, 2025 6:43:33 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

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Hi Natalie,

I've just reached back out to our consultants for an update. They wanted to do a final QA against some Nav Canada data before sharing the digital files. I'm hoping to receive them soon, do my own internal review quickly, then send them to Kitchener if all looks good.

When do you need final comments from us?

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

[REDACTED]

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From: Natalie Goss <Natalie.Goss@kitchener.ca>

Sent: March 10, 2025 4:55 PM

To: [REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

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Hi Jordan,

Further to our emails exchange a few weeks ago, I'm hoping that you can provide me with an update on the timing of the draft AZR and an indication of when we may expect updated comments from you with respect to airport height matters as they related to Growing Together

East.

Thank you for your continued conversations on this.

Natalie

From: [REDACTED]
Sent: Tuesday, February 18, 2025 9:43 AM
To: Natalie Goss <Natalie.Goss@kitchener.ca>
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Good morning Natalie,

Thanks for the ongoing dialogue, I appreciate the conversations.

I can confirm that we intend to use the draft AZR for reviewing development applications as soon as it is available. This does supersede the IDS studies for the PMTSAs.

I suggest we have a call early March to discuss the draft AZR and associated impacts on Growing Together East once we have both had a chance to review it.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

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From: Natalie Goss <Natalie.Goss@kitchener.ca>
Sent: February 18, 2025 8:55 AM
To: Jordan Vander Veen [REDACTED]
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City
Importance: High

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Good morning Jordan,

Thank you for meeting with us at the end of January. We appreciate the updates that were shared about the timing of a draft AZR. As we understand, even though a new AZR won't be in effect for a few years, once the draft AZR is released in late February/early March it is intended to be used by airport staff in determining maximum heights where it applies rather than the maximum heights determined for Kitchener's PMTSAs from the IDS studies. Please confirm that I have understood correctly. If you could possibly confirm this by the end of the day today I would appreciate it.

Following our January call, you will have received circulation of the draft land use and zoning for Growing Together East. Should you have any questions about that material please let us know. We continue to consider comments received in preparation for a recommendation report to Council in April.

Natalie

Natalie Goss, MCIP, RPP (she/her)

Manager, Policy & Research | Planning & Housing Policy Division | City of Kitchener

NEW – 519-783-8933 | TTY 1-866-969-9994 | natalie.goss@kitchener.ca



From: Jordan Vander Veen [REDACTED]
Sent: Thursday, January 23, 2025 12:14 PM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - Region & City

Hi Matthew,

Thanks for providing the agenda, and looking forward to our discussion next week.

I reviewed the agenda and would like to advise that we cannot answer all of your airport-related questions until the proposed AZR is developed. My consulting team is still working on the proposed AZR which I expect to receive late February, and so I can share it once we review internally and are satisfied with it. I'll attend next week, but I suggest we set up another call early March to review the proposed AZR as it relates to Growing Together East, and answer any questions you have at that time.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International

Airport

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-----Original Appointment-----

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: January 16, 2025 1:44 PM

To:

Subject: Growing Together East - Region & City

When: January 30, 2025 2:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

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Updated meeting invitees and agenda attached

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For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

2024 IDS AERONAUTICAL ASSESSMENT FOR KITCHENER MTSAs

Task Description

- The objective of this study is to determine the ceiling (maximum permissible height) for 10 Areas located in the vicinity of Kitchener/Waterloo Airport and provided in a Google earth file named “Kitchener MTSA Analysis”.



Figure 1 : 10 Zones designated as Area 1 to 10

IDS North America Ltd.

idsna@idscorporation.com - www.idscorporation.com/na

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Ottawa, Ontario K2M 2A8, Canada

Montreal Office:

418 Sherbrooke Street East,
Montreal, Quebec H2L 1J6, Canada
Tel: +1 514-789-0082
Fax: +1 514-398-0527

Aeronautical Data

- The relevant existing and planned approaches were analysed (LPV effective July 11th).
- The most recent Criteria for the Development of Instrument Flight Procedures was applied for this study.

RNAV (RNP) Y RWY 08

Figure 1 below shows the areas relative to the RNAP RNP 0.15 RWY08.

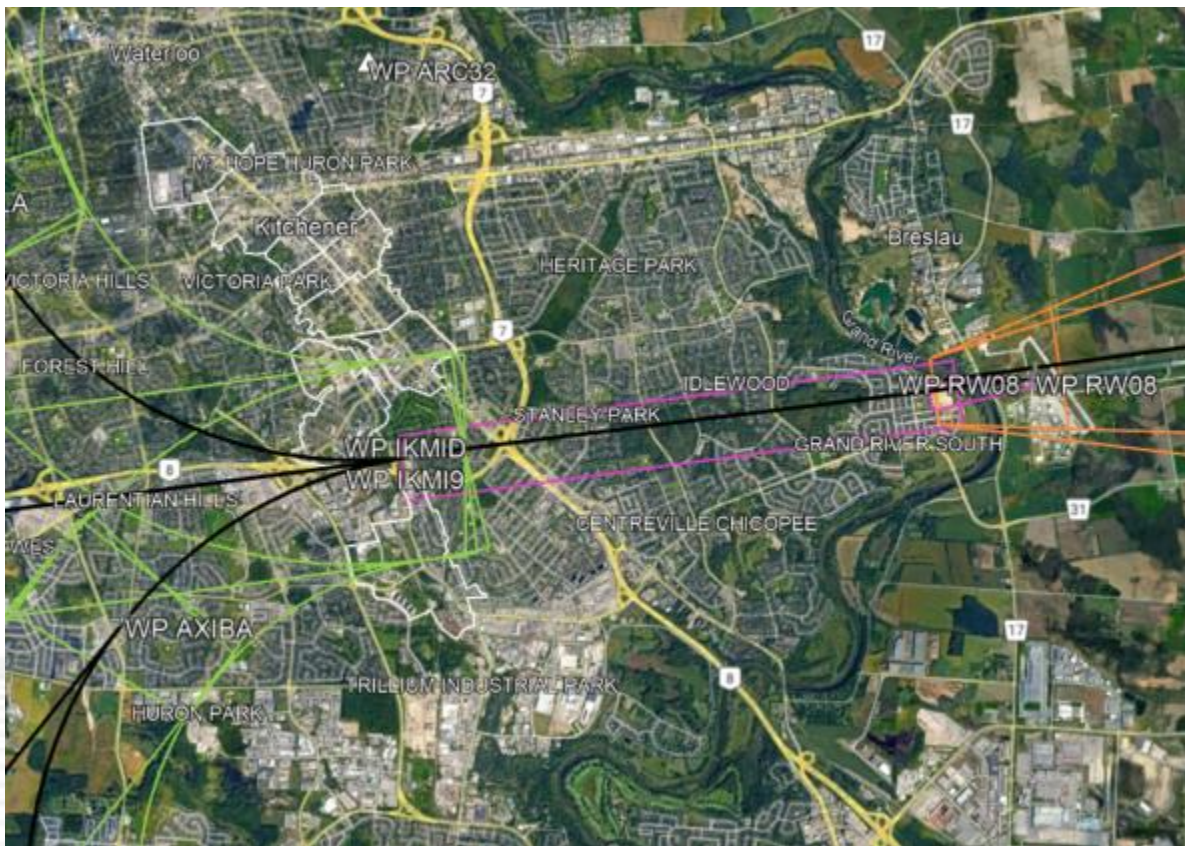


Figure 2 Relative positions of the studied Areas Vs
RNAV RNP 0.15 RWY 08 at CYKF

Some of the areas are within the Intermediate Segment of the IAP. The intermediate allows for a maximum altitude of 1800' ASL. Some areas lie beneath the Final segment of the 0.3 RNP and only Blockline lies below the 0.15 RNP, allowing for a maximum altitude of 1794' ASL to 1,800' ASL.

EXISTING LPV RWY 08

Figure 3 below shows the relative positions of the 10 Areas relative to the LPV RWY 08.

Most of the areas are in the intermediate segment of the IAP. The maximum altitude allowed in the intermediate segment is 1800' ASL. Some also lie beneath the Final segment (Borden in the secondary area, and Blockline with a very small portion in the primary area) restricting the areas maximum allowable height between 1691' and 1800'.

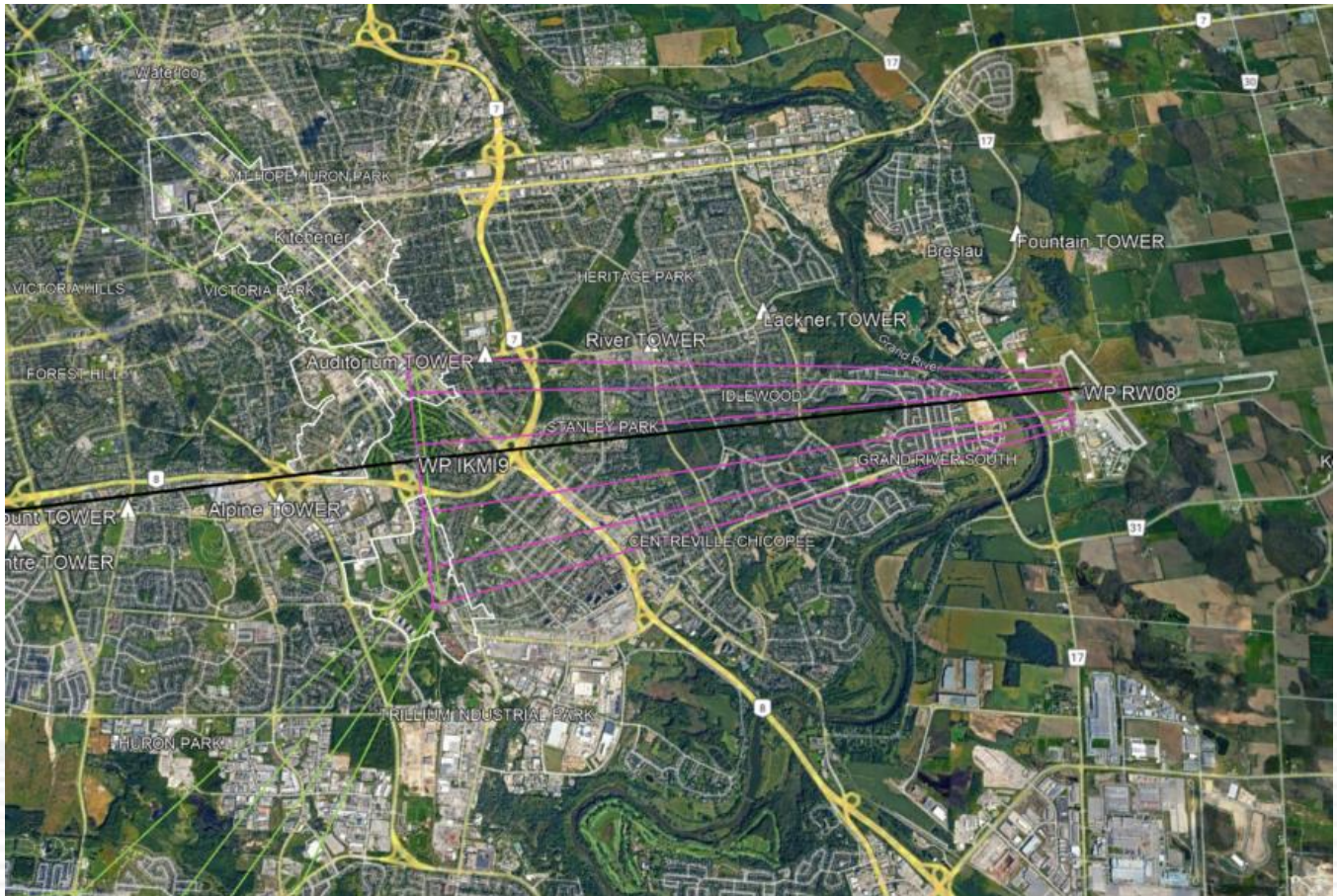


Figure 3 Relative positions of the studied Areas Vs LPV RWY08 at CYKF

DEPARTURES OFF RUNWAY 26

Figure 4 shows the relative positions of the 10 areas relative to the Departure Obstacle Evaluation Surfaces. All 10 areas are outside the Initial Climb Area (ICA). They all lie inside Area A almost straight ahead or right of the runway direction.



Figure 4 Relative positions of the 10 areas relative to the Departure RWY 26

Based on the shortest distance between each area and the ICA, the ceiling height of each area would be limited to a height of 1,534' to 1,751' ASL.

SUMMARY

The following Table shows the most restrictive ceiling height limitation (in Yellow) according to each IAP.

TABLE 1 – Summary of ceiling height limitation for each area (Ft ASL)

AREA		RNP RWY 08	LPV RWY 08	LNAV/VNAV RWY08	LNAV RWY08	DEPARTURE* RWY 26
No 1	Grand River Hospital	N/A	1,800	1,800	1,800	1,751
No 2	Central	N/A	1,800	1,800	1,800	1,683
No 3	Kitchener City Hall	N/A	N/A	1,800	1,800	1,638
No 4	Frederick	N/A	N/A	1,800	1,800	1,606
No 5	Victoria Park	N/A	1,800	1,800	1,800	1,666
No 6	Queen	N/A	1,800	1,800	1,800	1,637
No 7	Kitchener Market	N/A	1,800	1,800	1,800	1,577
No 8	Borden	1,794	1,800	1,739	1,800	1,534
No 9	Mill	1,800	1,800	1,800	1,800	1,600
No10	Blockline	1,800	1,691	1,742	1,800	1,538

TABLE 2 – Summary of ceiling height limitation for each area (Ft ASL), before and after the changes to the RNP and RNAV RWY 08

MTSA	Before the Amendment to the RNP and RNAV RWY 08	New Height Limitation	Difference
Grand River Hospital	1600ft ASL	1,751' ASL	+151ft
Central	1600ft ASL	1,683' ASL	+83ft
Kitchener City Hall	1600ft ASL	1,638' ASL	+38ft
Frederick	1600ft ASL	1,606' ASL	+6ft
Victoria Park	1600ft ASL	1,666' ASL	+66ft
Queen	1600ft ASL	1,637' ASL	+37ft
Kitchener Market	1573ft ASL	1,577' ASL	+4ft*
Borden	1530ft ASL	1,534' ASL	+4ft*
Mill	1596ft ASL	1,600' ASL	+4ft*
Blockline	1534ft ASL	1,538' ASL	+4ft*

*: A The Departure Rwy26 was evaluated using the latest TP308 Change 8.1 which accounts for the clearway. This was done in order to protect for future changes.

2024 IDS AERONAUTICAL ASSESSMENT FOR KITCHENER MTSAs

Task Description

- The objective of this study is to determine the ceiling (maximum permissible height) for 12 Areas located in the vicinity of Kitchener/Waterloo Airport and provided in a Google earth file named “Kitchener MTSA Analysis”.



Figure 1 : 12 Zones designated as MTSA Area 1 to 12

IDS North America Ltd.

idsna@idscorporation.com - www.idscorporation.com/na

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Montreal, Quebec H2L 1J6, Canada
Tel: +1 514-789-0082
Fax: +1 514-398-0527

Aeronautical Data

- The relevant existing and planned approaches were analysed (LPV effective July 11th).
- The most recent Criteria for the Development of Instrument Flight Procedures was applied for this study.

RNAV (RNP) Y RWY 08

Figure 2 below shows the areas relative to the RNAP RNP 0.15 RWY08.

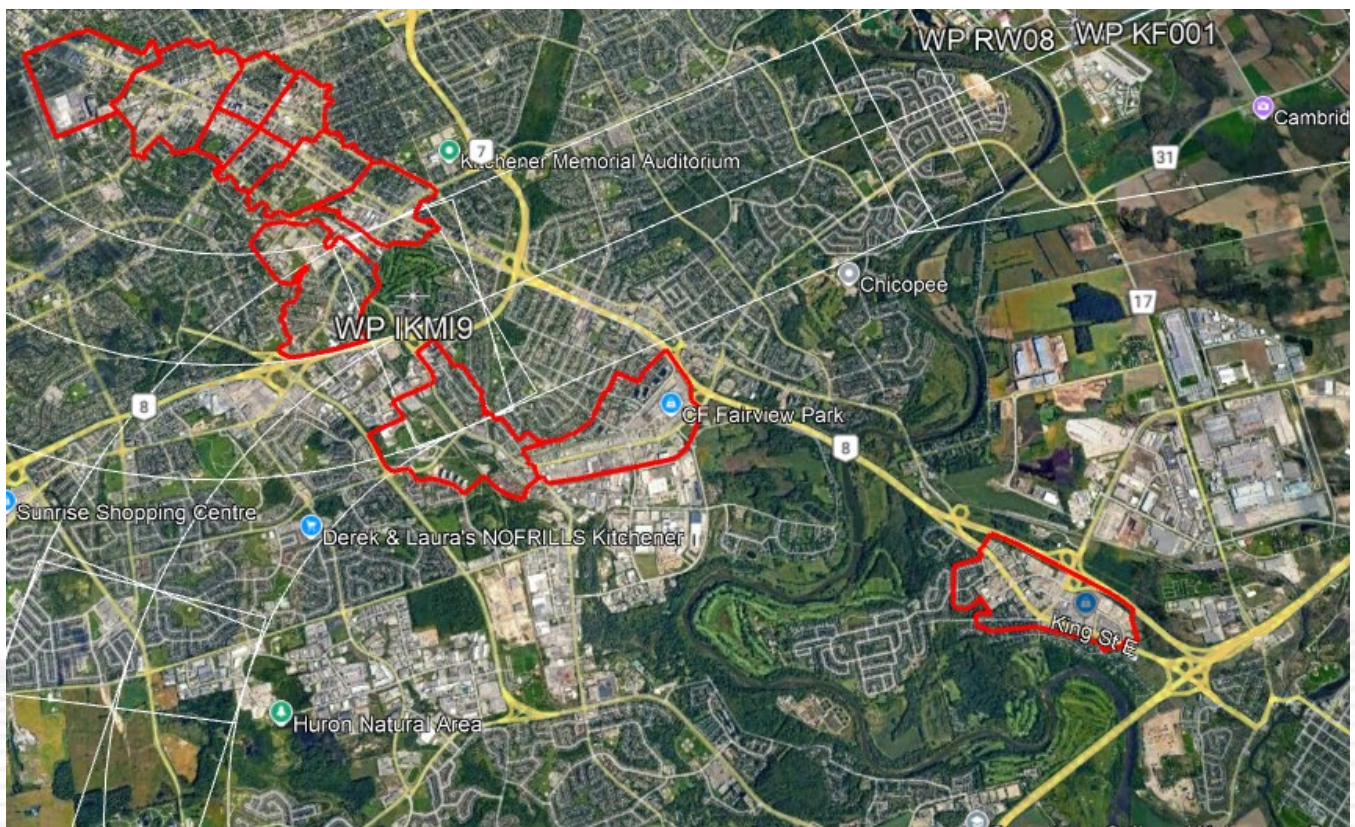


Figure 2 Relative positions of the studied Areas Vs
RNAV RNP 0.3 RWY 08 at CYKF

Some of the areas are within the Intermediate Segment of the IAP. The intermediate allows for a maximum altitude of 1800' ASL. Some areas lie beneath the Final segment of the 0.3 RNP and only Blockline lies below the 0.15 RNP, allowing for a maximum altitude of 1794' ASL to 1,800' ASL.

EXISTING LPV RWY 08

Figure 3 below shows the relative positions of the 12 Areas relative to the LPV RWY 08. Most of the areas are in the intermediate segment of the IAP. Some also lie beneath the Final segment (Borden in the secondary area, and Blockline with a very small portion in the primary area) restricting the areas maximum allowable height between 1691' and 1800'. Fairway and Sportsworld are outside the LPV surfaces.



Figure 3 Relative positions of the studied Areas Vs LPV RWY08 at CYKF



Figure 3a: Relative position of the studied areas relative to the LNAV RWY 08

DEPARTURES OFF RUNWAY 26

Figure 4 shows the relative positions of the 12 areas relative to the Departure Obstacle Evaluation Surfaces. All 12 areas are outside the Initial Climb Area (ICA). They all lie inside Area A almost straight ahead or right of the runway direction.



Figure 4 Relative positions of the 10 areas relative to the Departure RWY 26

Based on the shortest distance between each area and the ICA, the ceiling height of each area would be limited to a height of 1,418' to 1,751' ASL.

SUMMARY

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No 4	Frederick	N/A	N/A	1,800	1,800	1,606
No 5	Victoria Park	N/A	1,773	1,800	1,800	1,666
No 6	Queen	N/A	1,773	1,800	1,800	1,637
No 7	Kitchener Market	N/A	1,773	1,800	1,800	1,577
No 8	Borden	1,794	1,773	1,739	1,800	1,534
No 9	Mill	1,800	1,773	1,800	1,800	1,600
No10	Blockline	1,800	1,691	1,742	1,800	1,538
No11	Fairway	N/A	N/A	1,587	1,350***	1,418
N012	Sportsworld	N/A	N/A	N/A	N/A	1,526**

Note that other Instrument Flight Procedures apply to the MTSA areas noted above, however they are less restrictive than the critical height identified.

*: A The Departure Rwy26 was evaluated using the latest TP308 Change 8.1 which accounts for the clearway. This was done in order to protect for future changes.

**: the current departure is more restrictive to Sportsworld MTAS, then the new criteria, which will restrict the height to 1,578'.

***: A very very small portion of the Fairway MTSA area falls in the primary area of the final section of the LNAV RWY 08 limiting its entire height to 1,350'.

From: [William Towns](#)
To: [Matthew Rodrigues](#)
Cc: [Natalie Goss](#); [Adam Clark](#)
Subject: RE: Block Line / Courtland Transit Facility
Date: Thursday, January 23, 2025 1:13:43 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Sounds good – thanks Matt. See you next week.

Will

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: January 23, 2025 1:04 PM
To: [REDACTED]
Cc: Natalie Goss <Natalie.Goss@kitchener.ca>; Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: Block Line / Courtland Transit Facility

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Thanks, Will. This is very helpful and really appreciate the quick turnaround. Agreed that we likely do not need to discuss this further next week given that this matter is expected to continue as-is – however, time permitting I may ask a question about other road network opportunities on the site in relation to the regional road access point at Hillmount.

With that, we will circulate a draft of LEA's recommendations report once that is available and would appreciate GRT's (& Regional Transportation's) review of all recommendations in the Report to make sure there are no other agreements, easements, etc. that we ought to be aware of.

Thanks again,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: William Towns [REDACTED]

Sent: Thursday, January 23, 2025 12:40 PM

To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Cc: Natalie Goss <Natalie.Goss@kitchener.ca>; Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: Block Line / Courtland Transit Facility

Thanks Matt – received the following update from GRT staff:

- As you've alluded to, the Region's secured this facility through the execution of a development agreement. GRT has worked with the previous owners and will continue to work with the new owner to implement the agreement to the Region's satisfaction.
 - The new owner's aware of the agreement and recently met with our Commissioner to discuss the subject property.
 - If the new owner has questions for the City regarding the Development Agreement, please direct them to call Doug Spooner again or get in touch with Bridget Coady (BCoady@regionofwaterloo.ca). Any future amendments to the agreement, or its full/partial release, will be discussed first with the property owner and the Region's Solicitor.
- This agreement, as well as all other existing Regional easements, GRT infrastructure and service, in proximity to this property, should be taken into account when the City's consultant considers any improvements for Block Line Road. GRT staff are available to review and comment on conceptual road improvements and/or meet with the City's consultant to ensure existing and planned transit infrastructure and service is not impacted by any proposed improvements.
- The GRT Business Plan represents a 5-year horizon and since a formal Planning Act Application has not yet been submitted for this property, the timeframe for the Block Line transit facility may not be fully represented in the Business Plan. However, GRT's strategic long-range plans for this facility and Station Area remain.

No problem to add this item to the agenda if you wish, but the broad takeaway is that Regional plans and the status of the development agreement have not changed re: this property, and may not warrant specific discussion next week (given time constraints) unless you have follow up questions for GRT based on the above.

Hope this helps,

Will Towns, MCIP, RPP

Senior Planner

Planning, Development and Legislative Services



From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: January 23, 2025 9:00 AM

To: [REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>; Natalie Goss <Natalie.Goss@kitchener.ca>

Subject: Block Line / Courtland Transit Facility

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Morning Will,

I wanted to run a matter by you that came to our attention yesterday. I understand that in 2018, the Region entered into an agreement with the developer of the large Block Line and Courtland site (between the freight rail line and Block Line Station/Courtland Ave.) to establish a transit facility as part of the private development – including a bus loop (connecting Courtland Ave. to Block Line Rd.), staff parking, and transit staff facilities (the Regional Document Number is 2867247 if helpful).

I am hoping to understand from GRT – perhaps as an addendum agenda item to our meeting next week (or via email), whether this facility is still required as part of the Business Plan work underway or the Region’s intentions to secure it. For context, our Transportation consultant for GTE (LEA Consulting) is determining road network improvements in each station area, and this agreement may change how we frame our recommendations. Further, this site has now changed ownership hands a couple times since 2018, so it is unknown at this time if the new owners would develop the site according to approved plans or seek to submit new plans.

Could you run this by some folks at the Region to see if we need to talk about this further? Happy to add some additional time to our meeting next week or connect separately with folks at GRT.

Appreciate it,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca



From: [William Towns](#)
To: [Natalie Goss](#); [Adam Clark](#)
Cc: [Alyssa Bridge](#)
Subject: RE: For Review - Growing Together East Reports
Date: Monday, March 10, 2025 4:46:57 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Hi Natalie and Adam – with apologies, a couple internal review groups need some additional time to complete comments on the technical reports. Appreciate that the project's on a tight timeline so I'll keep you updated, but not anticipating major delays.

Best,

Will Towns, MCIP, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo



From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: February 20, 2025 12:22 PM

To: [Redacted]

[Redacted]

Subject: For Review - Growing Together East Reports

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Hi Will,

Further to our emails this morning, LEA Consulting has prepared their two final reports for the Transportation and Noise Analysis Study (respectively) for Growing Together East. I have sent you the files under separate cover – which I see you've been able to successfully download!

As we move through next steps in the process, could I ask that Regional comments be received **by March 10th**? If there are major comments that are flagged earlier, let me know as well as this may impact our Council reporting deadlines. Let me know if you have any questions or concerns.

I've attached a comment matrix to this email that you can use for comments if helpful.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca





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Telephone: 519-575-4400
TTY: 519-575-4608
Fax: 519-575-4466
www.regionofwaterloo.ca

Will Towns, MCIP, RPP

January 17, 2025

Natalie Goss, MCIP, RPP
Manager, Policy and Research
Planning Division
City of Kitchener
200 King Street West
Kitchener, Ontario
N2G 4V6

Dear Ms. Goss,

**Re: Proposed City-Initiated Official Plan Amendment and Zoning
By-law Amendment
Growing Together East
Fairway, Block Line and Sportsworld Major Transit Station
Areas
City of Kitchener**

Regional staff have continued to review materials associated with the City-initiated Growing Together East station area planning project, which proposes an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for three Major Transit Station Areas (MTSAs) within the City of Kitchener. This exercise will extend the land use planning framework (including land use designations and zones) established through the predecessor Growing Together West process to the Block Line, Fairway, and Sportsworld MTSAs as identified on Figures 7c-d and 8a of the Regional Official Plan (ROP).

Planning for these MTSAs is critical to ensuring smooth integration of Stage 1 and Stage 2 ION from the existing light rail terminus at Fairway Station into southeast Kitchener and Cambridge. As identified in comments provided to City staff on December 24, 2024, the Region is highly supportive of the planning work that's been done to date, and Regional staff now have additional commentary to provide pertaining to ION Stage 1 and Stage 2 and Grand River Transit bus service and operations.

Grand River Transit & Rapid Transit (ION) – Draft Land Use and Zoning Maps

Regional staff representing Grand River Transit (GRT) and Rapid Transit (ION) have reviewed the draft land use and zoning maps, as well as the draft zoning by-law with regard to potential impacts to Regional transit services, including the Regional Council-approved Stage 2 ION alignment.

The entirety of these three MTSA's are well-served today both by conventional transit and rapid transit services, including ION Light Rail Transit (LRT) at Block Line and Fairway Stations and adapted Bus Rapid Transit at Sportsworld Station. The Council-approved alignment for Stage 2 ION from Fairway Station to Ainslie Street Terminal in Cambridge is planned to run within the King Street East right-of-way through the majority of Sportsworld MTSA.

In general, GRT and Rapid Transit staff support the proposed introduction of mixed uses and transit-supportive densities to the existing, predominantly low-rise, commercial and residential land uses in the Growing Together East PMTSA's. Fairway and Sportsworld MTSA's in particular are of critical importance to both GRT's existing service and to future service expansion. The Growing Together East location-specific Official Plan and zoning policies will need to reflect the importance of existing GRT operations and infrastructure, and also protect and provide flexibility for GRT's future service and infrastructure expansion needs. In absence of this consideration, impacts to conventional and rapid transit GRT services at the station area, system, and community-wide levels (such as increased costs, project delays and incompatible development) may be experienced over time.

The Region is currently undertaking an Initial Business Case (IBC) to extend ION from Fairway Station through the Sportsworld MTSA and south to the planned terminus location in Cambridge. It is expected this route will follow the Regional Council-approved Stage 2 ION alignment as per the Regional Intensification Corridor designated on Map 1 of the Regional Official Plan (as implemented via Regional Official Plan Amendment No. 6 in 2023). Once the IBC has been completed and accepted by Regional Council, detailed design of the Stage 2 ION rapid transit infrastructure can begin. Detailed design will stipulate land requirements for ION and connecting services at and in proximity to Fairway Station, and ultimately, the land needs and final location of the ION station to be located within the Sportsworld MTSA as well.

In recognition of the importance of lands within the Fairway and Sportsworld MTSA's to the appropriate and effective design and operation of Stage 2 ION, Regional staff request a meeting with City staff to have an in-depth discussion of policy and planning tools that may be effective and beneficial in ensuring that lands required for Stage 2 ION remain available for the project. This might include the use of a holding provision on lands deemed most critical to land assembly efforts and design considerations for Stage 2 ION, and/or the inclusion of language similar to Regional Official Plan Policy 5.A.3 and 5.A.36 in Official Plan and zoning policies for the Growing Together East MTSA's. These policies highlight that through the development review process, proponents may need to provide easements, land dedications/road widenings, and/or transit amenities in order to support the development and operation of the Regional transit system. These policies are provided below for ease of reference.

5.A.3: The Region and area municipalities will secure the following requirements prior to, or as a condition of approval of a *development application* or *site plan*, in order to support the development and operation of the Regional transit system and/or Regional Roads:

(a) the granting of easements and the dedication of land, including those for future *rapid transit* lines, sidewalks, bicycle pathways, *rapid transit* stations, transit terminals, *transit stops*, public transit rights-of-way, Regional Roads, roundabouts, rideshare facilities and utilities;

(b) the provision of associated amenities such as transit shelters, pads, energy efficient lighting and bicycle racks. The provision of such amenities will be the financial responsibility of the owner/applicant, unless funding is available through other sources satisfactory to the Region;

(c) *site plan* designs that meet the needs of *pedestrians*, cyclists and transit users, thereby promoting physical activity.

5.A.36: In addition to requiring road widenings to secure the Designated Road Allowance shown in Schedule 'A', the Region may require road widenings as a condition of approval of a *development application* and/or *site plan*, for the following purposes:

(a) to provide for dedicated pedestrian and/or dedicated cycling infrastructure, including sidewalks, multi-use trails, and/or or cycling lanes;

(b) to provide for transit and *rapid transit infrastructure*, planned or existing, including dedicated transit right-of-way, station/stop infrastructure and/or other transit system *infrastructure* requirements;

(c) to provide suitable access to major traffic generators or attractors; and

(d) to accommodate cut and fill slopes.

If this discussion cannot be accommodated within the scope of the next meeting scheduled with the Growing Together East project team in late January, Regional staff will be in touch to confirm an additional or alternate date and time to convene.

Transportation Analysis Study – Phase 1: Background & Methodology Memo

Regional staff in Transportation Planning, Rapid Transit, and Grand River Transit have reviewed the memo prepared by LEA Consulting. The Region has no concerns with the report, and offers the following general commentary for consideration by the City and consulting team:

- Regional staff have no concerns with the framing of the transportation context in the report for each of these MTSAs, and are supportive of the work as a means to reduce the need for additional or expanded greenfield lands in the City over the long term.
- There may be value in coordinating and reviewing the forecasting work LEA has identified in Section 6.2 with work the Region's consultant (Arcadis) will be conducting for Stage 2 ION. More information will be provided once LEA's analysis is complete in response to the Phase 2 report.

- Regional staff acknowledge that the consultant is developing a target mode share for these MTSAs as per Section 6.4. Similar to the previous comment, Regional staff will provide more feedback on this work and information about alignment with ongoing Regional efforts in the context of the Phase 2 report to ensure consistency with Regional projections for Stage 2 ION.

Conclusions

Thank you again for the opportunity to provide comments on and input to the Growing Together East project. Please do not hesitate to contact the undersigned at wtowns@regionofwaterloo.ca with any questions in advance of our next meeting.

Yours truly,



Wil Towns, MCIP, RPP
Senior Planner

Cc: Matthew Rodrigues, Senior Planner (Policy), City of Kitchener
Adam Clark, Senior Urban Designer, City of Kitchener
Alyssa Bridge, Manager, Regional Development Services, Region of Waterloo

From: [William Towns](#)
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Natalie Goss](#); [Alyssa Bridge](#); [Amanda Kutler](#)
Subject: RE: Growing Together East - Various Items
Date: Wednesday, October 23, 2024 3:31:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[DOCS ADMIN-#4482764-v1-City of Kitchener TID Data NG Signed.pdf](#)
[Threats in MTSAs - Blockline Fairway Sportsworld .XLSX](#)

Hi Matt (and the Growing Together East team) – please see attached for an excerpt of the Region’s Threat Inventory Database (TID) that includes all known and high threats within the boundaries of the three MTSAs. The data’s shared under the provisions of the attached TID agreement from last fall.

Looking forward to our discussion next week about the airport. Let me know if you have any questions (beyond the discussion of cranes and zoning) for Jordan in advance and I’ll pass them along.

Talk soon,

Will Towns, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: October 11, 2024 1:23 PM

To: [REDACTED]

[REDACTED]

Subject: RE: Growing Together East - Various Items

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Hi Will, thanks so much for this update – super helpful.

I’ve provided some responses, below, in blue for your consideration. I also wanted to update this group that we will be posting a *draft* land use and zoning map on the Engage Kitchener page in the coming weeks to kick-off consultation with landowners and the community – absent of any updated

policies or zoning regulations for these MTSA's that we expect will be needed for these areas.

Have a great Thanksgiving weekend as well,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]
Sent: Friday, October 11, 2024 11:41 AM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - Various Items

Hi Matt, thanks for the updates and apologies for the delay. We've compiled the RSC data for known and high source water threats clipped to these MTSA's and will be in a position to share it soon. I've also connected with our Hydrogeology and Water Programs staff to confirm that we have the most up-to-date wellhead protection area mapping. I'll provide updates on these items next week. [This is super. Thanks for the update.](#)

Our airport staff (i.e. Jordan Vander Veen) have given us the go-ahead to provide **draft maximum height values** (which include crane heights) for each MTSA (below). I'm told the Aeronautical Assessment report will be finalized soon. Jordan also indicated that he's more than willing to meet with City staff to discuss these values, the updated Airport Zoning Regulation data that's in the process of being confirmed with Transport Canada, and any other questions you might have. Just let me know your preferences in this regard. [Thank you for this update. It would be great to find some availability in October for us all to meet to discuss this, including for example helping us understand how crane heights can be included in Planning Act zoning regulations. I'll kick things off – how do October 22nd at 11:30 a.m. or October 28th or 29th at 3:30 p.m. look for your team for a 60-min meeting, including Jordan?](#)

- Block Line – 1,538 feet ASL (468.7m ASL)
- Fairway – 1,350 feet ASL (411.4m ASL)
- Sportsworld – 1,578 feet ASL (480.9m ASL)

Finally – I've tracked down previous Regional reports and legwork re: open space/connections in these MTSA's that was undertaken through the Community Building Strategy many moons ago. I'll summarize and provide anything relevant once I've had a chance to review. I'll also provide comments on the noise study memo next week. [This is also super – really appreciate you digging into!](#)

Looking forward to meeting to discuss in a few weeks. [Let's see if we can use part of our time at the](#)

airport meeting (above) to discuss general updates? Enjoy your long weekends!

Will Towns, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: October 8, 2024 4:13 PM

To: [REDACTED]

[REDACTED]

Subject: Growing Together East - Various Items

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Hi Will, I hope your week is going well!

I wanted to follow-up on a few items from our Growing Together East meeting that we discussed and share with you an item for review.

- **RSC** – we had discussed that the Region had some data available (or close to available) to share. Can you advise when we might be able to expect this?
- **Airport** – we had discussed finding a time to meet with airport staff to learn more about the AZRs and new airport mapping. Can you let us know if a meeting is possible and/or if draft mapping can be shared?
- **Source Water Protection** – we had discussed that updated mapping is available for source water protection in Fairway & Block Line. Would you be able to share this draft mapping?

Lastly, our Consultants (LEA Consulting) who are completing the Transportation and Noise Study have prepared a memo (attached) which documents preliminary noise receivers and monitoring locations. Would the Region be able to review this for any concerns before monitoring gets underway? Any comments would be very much appreciated **by next week**. Let me know if this is feasible.

Once we've had a chance to review some of the materials noted above, it would be great to setup a meeting to walk through any questions. We had discussed a standing meeting, which I think is a

great idea, and would be most productive later in October / early November as City staff will have advanced some more work by this point as well.

That's it for now. Appreciate your support on this project! Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca



From: [William Towns](#)
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Natalie Goss](#); [Alyssa Bridge](#)
Subject: RE: Growing Together East - Various Items
Date: Thursday, October 31, 2024 11:47:37 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
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[image009.png](#)

Hi Matt – as discussed briefly on Tuesday, we’ve been confirming the latest and greatest in source protection mapping internally. For context, there are two sets of source protection mapping we apply in the course of development review: wellhead protection sensitivity areas, recharge areas, and intake protection zones as shown on [Map 6 of the ROP](#), and source protection mapping as prescribed by the Clean Water Act, which delineate wellhead protection and intake protection areas. The geographies are different and reflect different technical parameters...the ROP mapping is a bit dated, while the CWA mapping is reviewed more regularly as per legislative requirements.


As such, I’m told that the best source protection mapping available is from the 2022 Source Protection Plan update, which can be downloaded from GRCA’s open data portal at <https://data.grandriver.ca/downloads-geospatial.html> (note files with the SWP prefix – likely the most relevant to Growing Together are the Wellhead Protection Areas). There’s metadata included with file downloads, but if you have any questions, pass them along and I’ll confirm with our Risk Management Official.

Note that the CWA mapping covers a significantly smaller geography than ROP source protection mapping (reflecting the different methodologies) and demonstrate areas where a Section 59 Notice (and potentially risk management plans) are required as part of a complete application. The ROP mapping is still in effect of course and carries with it policy requirements as per ROP Chapter 8, but note that there’s effort ongoing to harmonize the two sets of mapping (timeline TBD; no draft available at this stage).

Hope this is helpful – not entirely sure how the City plans to include or reference source protection mapping in Growing Together East, so please let me know if you have questions, need additional info, etc. at this point and we can discuss further.

Best,

Will Towns, RPP
Senior Planner
Planning, Development and Legislative Services



From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: October 21, 2024 8:49 AM
To: William Towns [REDACTED]
Subject: RE: Growing Together East - Various Items

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Thanks, Will! Appreciate it.

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]
Sent: Friday, October 18, 2024 4:31 PM
To: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Growing Together East - Various Items

Hi Matt, sorry for the delayed response on the noise study memo. Safe to say that the locations they've flagged for all three MTSAs are well-considered and the approach is comprehensive – there don't appear to be any major stationary or transportation sources that aren't within a reasonable distance of the proposed monitoring locations. No concerns or suggestions from us on this. Feel free to keep us in the loop as the study moves along.

Have a great weekend,

Will

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: October 8, 2024 4:13 PM
To: [REDACTED]
[REDACTED] yssa
[REDACTED]
Subject: Growing Together East - Various Items

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Once we've had a chance to review some of the materials noted above, it would be great to setup a meeting to walk through any questions. We had discussed a standing meeting, which I think is a great idea, and would be most productive later in October / early November as City staff will have advanced some more work by this point as well.

That's it for now. Appreciate your support on this project! Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca



From: [William Towns](#)
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Elyssa Pompa](#); [Natalie Goss](#); [Alyssa Bridge](#)
Subject: RE: Growing Together East: Draft land use and zoning maps now available
Date: Friday, January 17, 2025 3:55:57 PM
Attachments: [DOCS ADMIN-#4867037-v3-Regional addendum comments \(GRT Rapid Transit\) - City of Kitchener - Growing Together East_OPA_ZBA.pdf](#)

Thanks Matt. As promised, see attached for comments on the transportation elements. The feedback I received from our transportation groups on the Phase 1 report was very general (and supportive), so I haven't included this commentary in a separate tracker.

In terms of incorporating the discussion of lands for Stage 2 ION into our meeting on the 30th as described in the letter: I'm waiting for some colleagues in GRT/RT to confirm availability for that date and I'll be in touch ASAP next week to confirm or discuss options for rescheduling or a separate meeting slot.

Have a great weekend,

Will Towns, MCIP, RPP
Senior Planner
Planning, Development and Legislative Services



From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: January 15, 2025 4:45 PM
To: [Redacted]
[Redacted]
[Redacted]
Subject: RE: Growing Together East: Draft land use and zoning maps now available

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Thanks, Will. I've sent out the calendar invite to hold the time for ourselves.

In reviewing the comment letter, I expect the following Regional matters / groups to be reflected on the agenda:

- Region of Waterloo International Airport
- Transportation (*TBD – will need to review the comments that are provided this week to confirm if we need to discuss anything at this juncture*)

I'll plan to get a more fulsome agenda shared with you early next week once we've digested the Transportation comments.

Appreciate it,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]

Sent: Wednesday, January 15, 2025 2:22 PM

To: [REDACTED]

Subject: RE: Growing Together East: Draft land use and zoning maps now available

Thanks Matt – Alyssa and I are available from 2:00-3:30 on the 30th, so why don't we plan for that. I'll forward the invite as necessary once we've got an agenda.

In terms of transportation comments: aiming to have these to you by Friday at the latest. Thanks again for your patience.

Cheers,

Will Towns, MCIP, RPP

Senior Planner

Planning, Development and Legislative Services

[REDACTED]

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: January 15, 2025 12:42 PM

To: [REDACTED]

[REDACTED]

Subject: RE: Growing Together East: Draft land use and zoning maps now available

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Hi Will,

Thanks again for providing these comments to us. As we work towards releasing draft materials in early February, could we find a time to meet at the end of January to discuss? The morning of Jan. 29 or afternoon of Jan. 30 are looking good for us. I might suggest we hold up to 90-mins, although we may not need all of the time. We would share an agenda in advance of the meeting so that we can confirm the relevant folks.

Let me know what might work on your end and who should be there, and I can set something up in Teams.

Also, I wanted to follow-up on when we might be able to expect Regional transportation comments (both GRT/ION on the land use materials and transportation on the study report)?

Thanks!

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]

Subject: RE: Growing Together East: Draft land use and zoning maps now available

Hi everyone – please see attached for Regional comments on the Growing Together East draft land use and zoning maps with reference to a range of Regional responsibilities. Note that we'll provide more substantive comment from GRT/ION staff in short order in the new year. Looking forward to discussing these items further as your work progresses in 2025.

All the best and happy holidays,

Will Towns, RPP
Senior Planner
Planning, Development and Legislative Services

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: November 8, 2024 1:58 PM

To: [REDACTED]

Subject: FW: Growing Together East: Draft land use and zoning maps now available

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Hi Will & Alyssa,

I hope you're having a nice Friday so far. We will be formally circulating the below update to the Region's Planning Application email, but I wanted to make sure that this came across your desks.

The draft land use and zoning maps for Growing Together East have now been published for the community. Specific details regarding site-specific zoning, holding provisions, and other area-specific policies that may be required as part of our technical studies will be forthcoming in the new year. This public release is a first opportunity for the community and landowners to understand the draft recommendations for their properties. Details regarding the Growing Together East ZBLA and OPA will be made available early in the new year – for now the Growing Together West approved / adopted frameworks are assumed to apply.

If you have any questions, please reach out. We'd be happy to setup a check-in call once you've had a chance to review.

Just a heads up that I'll be out of office from Nov. 11, returning Nov. 20, so please connect with Adam & team if anything comes up. I look forward to connecting when I'm back!

p.s. – Happy World Town Planning Day!

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
NEW 519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: Engage <EngageWR-NoReply@regionofwaterloo.ca>
Sent: Friday, November 8, 2024 11:42 AM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Subject: Growing Together East: Draft land use and zoning maps now available



Hi Matt Rodrigues,

We have an update to share about [Growing Together East](#).

Since May, staff have been working to develop the Draft Land Use and Zoning Maps for the Block Line, Fairway, and Sportsworld Major Transit Station Areas (MTSAs). The draft approach to growth and change combines public and collaborator feedback.

It also aligns with key City objectives to:

- Address the housing crisis by improving housing choice and affordability in Kitchener's MTSAs
- Address the climate emergency by creating transit-supportive communities. This includes maximizing the use of existing infrastructure and leveraging new infrastructure.
- Encourage a shift towards active transportation and transit within complete communities that provide for daily needs
- Help bring more people, activity, life and diversity to Kitchener's MTSAs

The draft land use and zoning maps recommend carrying forward the Strategic Growth Area land uses and zones approved by City Council for Kitchener's seven other MTSAs. Strategic Growth Areas allow a wide variety of housing types and mix of uses within Major Transit Station Areas.

Draft materials now available

Please view the [Draft Land Use Map](#) and [Draft Zoning Map](#) for a full description of the proposed changes. These draft materials are not final. Changes may be made based on continued dialogue with residents, industry collaborators, and agencies.

The Official Plan policies for Strategic Growth Area land uses can be found in [Section 15.D.2 of the Official Plan beginning on page 171](#).

You can also view the [Draft Zoning Bylaw for Strategic Growth Area zones](#). This Bylaw is currently under appeal.

Staff are happy to answer questions about these materials. Please contact us at GrowingTogether@kitchener.ca

Next steps

A complete set of draft materials will be published on this page by February 2025. This will include an:

- Official Plan Amendment
- Zoning Bylaw Amendment
- Engagement Summary
- Any additional policies, regulations or holding provisions that may apply

Beginning February 2025, staff will offer one-on-one meetings to discuss site-specific opportunities and review landowner submissions. See below for submission requirements.

We will then consider all comments and submissions as part of our final report to City Council in Q2 2025. Comments, questions and submissions can be emailed to growingtogether@kitchener.ca.

Landowner submission requirements

Landowners within the Study Area can provide written submissions about specific properties. If a request is made for a site-specific change, landowners must submit materials that meet the following criteria:

- Proof of lot ownership
- A conceptual design that demonstrates compliance with the desired zone and refers to the [zone standards approved through Growing Together West](#)
- A scoped planning justification addressing [Official Plan Policy 15.D.2.5](#) which requires:
 - a demonstration of compatibility with the planned function of the lands and adjacent lands
 - suitability of the lot for the proposed use or built form
 - lot consolidation
 - compliance with Kitchener's Urban Design Manual and Official Plan urban design policies
 - consideration of cultural heritage resources

Submit questions, comments and landowner submissions at any time to growingtogether@kitchener.ca

Still to come

The City is undertaking a Market Analysis Study and Transportation and Noise Study. This will inform any other policies or regulations that may be required within the Study Area. For example, holding provisions may be required for individual properties where a noise study is required or to address future traffic considerations.

Kind regards,

The project team

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From: [William Towns](#)
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Elyssa Pompa](#); [Natalie Goss](#); [Alyssa Bridge](#)
Subject: RE: Growing Together East: Draft land use and zoning maps now available
Date: Tuesday, December 24, 2024 1:16:20 PM
Attachments: [DOCS ADMIN-#4837069-v2-Regional preliminary comments - City of Kitchener Growing Together East OPA ZBA \(Dec 2024\).pdf](#)
[2024 IDS Aeronautical Assessment for Kitchener MTSAs v2 \(GTE\).PDF](#)
[DOCS ADMIN-#4847791-v1-Community Building Strategy \(2013\) and Place-Making Strategy \(2019\) - SWS FWY BLK excerpts and mapping.pdf](#)

Hi everyone – please see attached for Regional comments on the Growing Together East draft land use and zoning maps with reference to a range of Regional responsibilities. Note that we'll provide more substantive comment from GRT/ION staff in short order in the new year. Looking forward to discussing these items further as your work progresses in 2025.

All the best and happy holidays,

Will Towns, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo

[REDACTED]

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: November 8, 2024 1:58 PM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: FW: Growing Together East: Draft land use and zoning maps now available

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The draft land use and zoning maps for Growing Together East have now been published for the community. Specific details regarding site-specific zoning, holding provisions, and other area-specific policies that may be required as part of our technical studies will be forthcoming in the new year. This public release is a first opportunity for the community and landowners to understand the draft recommendations for their properties. Details regarding the Growing Together East ZBLA and OPA will be made available early in the new year – for now the Growing Together West approved / adopted frameworks are assumed to apply.

If you have any questions, please reach out. We'd be happy to setup a check-in call once you've had a chance to review.

Just a heads up that I'll be out of office from Nov. 11, returning Nov. 20, so please connect with Adam & team if anything comes up. I look forward to connecting when I'm back!

p.s. – Happy World Town Planning Day!

Thanks,



PLANNING, DEVELOPMENT
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Will Towns, RPP

December 24, 2024

Natalie Goss, MCIP, RPP
Manager, Policy and Research
Planning Division
City of Kitchener
200 King Street West
Kitchener, Ontario
N2G 4V6

Dear Ms. Goss,

**Re: Proposed City-Initiated Official Plan Amendment and Zoning
By-law Amendment
Growing Together East
Fairway, Block Line and Sportsworld Major Transit Station
Areas
City of Kitchener**

Regional staff wish to thank the City of Kitchener for the opportunity to participate in project information meetings, review draft materials, and provide initial comments related to the proposed City-initiated Growing Together East project, which proposes an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for three Major Transit Station Areas (MTSAs) within the City of Kitchener. Regional staff understand that this exercise will extend the land use planning framework (including land use designations and zones) established through the predecessor Growing Together West process to the Block Line, Fairway, and Sportsworld MTSAs as identified on Figures 7c-d and 8a of the Regional Official Plan (ROP).

Planning for these MTSAs is critical to ensuring smooth integration of the Stage 1 and Stage 2 ION from the existing light rail terminus at Fairway Station into southeast Kitchener and Cambridge. The Region is highly supportive of the planning work that's been done to date, and these comments are provided to the City for their consideration and to provide a summary of information pertaining to Regional responsibilities in relation to the proposed OPA and ZBA material developed to this point. Additional comments will be provided in response to updated materials and as Regional understanding of impacts and opportunities associated with Growing Together East evolves.

Community Planning
Provincial Planning Statement 2024 (PPS 2024)

PPS 2024 provides policy direction that supports the delineation of and intensification within Major Transit Station Areas. Section 2.3 provides for additional importance in these areas as a key focus for growth in settlement areas, and Section 2.4 indicates that strategic growth areas (including MTSAs) should identify the appropriate type and scale of development in the MTSA. Section 2.4.2.6 indicates that these areas should be planned and designed in a transit-supportive manner that enables multi-modal access, promotes service integration, and facilitates connectivity between local and regional transit services.

Through its identification of flexible-use designations and zones, Growing Together East aims to enhance the mix of land uses and to provide for transition and regeneration within strategic areas in Kitchener. Notwithstanding discussion related to proposed unlimited building heights in select areas and compatibility with airport operations discussed below, Regional staff are satisfied that Growing Together East is consistent with the PPS 2024.

Regional Official Plan

In 2023, Regional Official Plan (ROP) Amendment No. 6 was approved by the Minister of Municipal Affairs and Housing, introducing new growth management policies for the Region. This included policies specific to Major Transit Station Areas outlined in Section 2.D.2, and the identification of these areas on Map 2 of the Regional Official Plan and further refined in Figures 4a-9d. Policy 2.D.2.2 requires area municipalities to undertake detailed planning to establish appropriate Official Plan policies and zoning by-laws to implement key objectives in this section of the ROP, including the achievement of density targets, facilitating transit-supportive development, and enhancing the mix of uses (among others). Density targets for the three Growing Together East MTSA's as per Table 2 in the ROP are summarized in the table below.

MTSA	ROP Density Target (people and jobs per hectare)
Block Line	80
Fairway	160
Sportsworld	160

In addition, policies 2.D.2.4 and 2.D.2.5 require area municipalities to initiate station area planning that promotes modal shift; guide infrastructure and other capital decisions; presents a clear vision in terms of the appropriate and desired scale and type of built form; and applies best-practices in urban design and transportation planning.

Growing Together East implements policy direction and requirements throughout 2.D.2 through the identification of land use designations and zones that enhance land use mix, promote high densities in proximity to transit, and account for transition to ensure compatibility with existing development. Regional staff are satisfied that this initiative

conforms to the growth management provisions of the ROP – additional policy areas are identified below in which demonstration of conformity will be required.

Community Building Strategy (2013) & Place-Making Strategy (2019) – Advisory

The Community Building Strategy (CBS) was undertaken by the Region in collaboration with staff from the Cities of Kitchener, Cambridge and Waterloo and completed in 2013 in advance of Stage 1 ION. While station area boundaries and the development context in each of these areas have changed over the intervening decade, this document provides station area planning principles and area-specific recommendations that may remain relevant to Growing Together East.

In addition, and building on station area planning work undertaken throughout the Region in advance of ION Stage 1 – including the City of Kitchener’s Planning Around Rapid Transit Stations (PARTS) initiative, to which Growing Together provides an update – a project was jointly undertaken between Regional and City staff (completed in 2019) to identify place-making opportunities throughout MTSA’s in Kitchener, including the identification of “green connections and corridors” throughout station areas. This culminated in the report entitled Public Art and Green Connections: Place Making in a Regional Context (the Place-Making Study or PMS), dated April, 2019.

Relevant excerpts of the CBS and connection/opportunity mapping from the PMS are attached to these comments for the City’s consideration, with key summary information provided below. Note that the three MTSA’s under consideration received relatively little attention in the PMS, but where noteworthy connection opportunities were identified, these have been identified in the summaries below.

Block Line Station Area

- Access to Lennox Lewis Way from Courtland Avenue East is identified as a critical missing connection between Block Line Station and the existing high school and recreational facilities in the area. Partnerships and planning efforts to overcome this elevation/topographical challenge and the obstacle presented by the rail corridor are recommended in the CBS.
- Lands immediately west of Courtland Avenue are identified as appropriate for high-density development, stepping down to mid-rise to interface with the Vanier neighbourhood. Draft zoning/land use maps indicate that the City has taken this approach into consideration.

Fairway Station Area

- Fairway Station is a critical hub in the network, representing the interface of ION Stages 1 and 2. Lands in proximity to the existing light rail platform are critical to the functioning and attractiveness of ION over the long term – ensuring any redesign of the Fairview Park Mall lands accounts for ION and GRT bus integration in a fashion that prioritizes access and circulation of pedestrians, transit users and cyclists is a key principle to consider in the development of area-specific policies for lands bounded by Wilson Avenue, Fairway Road South, Kingsway Drive, and Highway 8 (as well those east of Fairway Road South and the mall, wherein the future LRT corridor is identified).

- Large and underutilized parking lots offer significant opportunities for redevelopment, public amenity space, and low-speed roadway/active transportation connections.
- Consolidation of driveway access along both Regional and City roads and reconfiguration of parking lots to introduce new pedestrian and vehicle connections will assist in contributing to improving connectivity in Fairway MTSA as well.
- Reimagination of large-format retail west of Wilson Avenue on both sides of Fairway Road South presents an opportunity for mixed uses to address the street, while development at the intersection of Wilson and Fairway should be designed to account for larger future volumes of pedestrians travelling to and from Fairway Station.
- South of Fairway Road South and through the redevelopment of large-format commercial blocks, a new east-west collector road may be considered (in locations currently dominated by large parking lots) to provide new pedestrian connections and relieve congestion and pressure from Fairway Road South (e.g. from Manitou Drive to 225 Fairway Road South).
- Identifying opportunities for open space and connectivity between the existing ION platform/bus terminal and Fairway Road South should be explored.
- The Region and City should work to identify appropriate and strategic crossings of Fairway Road South as lands come in for redevelopment and road projects advance.
- Providing enhanced trail connections into the residential neighbourhood north of Fairway Station (on City roads and lands to be redeveloped) represent key opportunities for enhanced connections in the MTSA.

Sportsworld Station Area

- Opportunities exist to improve pedestrian access and safety in the MTSA through the provision of sidewalks and designated crossing points along Sportsworld Drive, Gateway Park Drive/Limerick Drive, Sportsworld Crossing Road, Heldmann Road, etc. Midblock crossings should be considered in locations where intersection spacing exceeds 200 metres.
- Large and underutilized parking lots offer significant opportunities for redevelopment, public amenity space and new connections through large properties, creating a finer-grained transportation network and offering more direct paths of travel.
- The CBS supports the creation of active frontages on King Street East and other focal points – parking should be provided in structured or underground facilities as appropriate on a site-specific basis.
- Developers with sites in and around the eventual station location (TBD; more information to come) should be mindful that the Region may be looking for enhanced amenities to support transit operations and the passenger experience – e.g. operator facilities and public washrooms, heated waiting areas.
- A multi-use trail is planned for the north side of King Street East over the long term (along with a new sidewalk recently installed on the south side as part of the 2023-2024 reconstruction project). Connections between future development and this infrastructure should be considered, as well as to existing City facilities in and out of the station area, including existing neighbourhood trails southeast of

the station area north of Pioneer Tower Road. Facilitating connections to the Hidden Valley neighbourhood and Environmentally Sensitive Policy Area may also yield public benefits in the form of access to greenspace in an otherwise heavily-urbanized station area.

Region of Waterloo International Airport

In accordance with Regional Official Plan Policy 5.A.20, Regional staff review policy projects and development applications to ensure that proposals do not negatively affect the usability, accessibility, or safe operations of the Waterloo International Airport either on a temporary or permanent basis. The airport is a valuable resource in the Region critical to maintaining existing economic competitiveness and enabling future economic development, and as such, the Region is committed to ensuring that the operation of and economic role the airport plays within the Region is protected for the long term. One means of doing so is by identifying land uses which may cause potential aviation safety hazards in accordance with relevant provisions of the Regional Official Plan, as well as Section 3.4.2 c) of the Provincial Planning Statement, 2024. Note that this provision of the PPS 2024 has been updated compared to Section 1.6.9 of PPS 2020 to prohibit rather than discourage land uses which may cause a potential aviation safety hazard.

To ensure conformity with the ROP and consistency with the PPS 2024, the Region is currently undertaking updates to the federally-regulated Airport Zoning Regulations (AZR) which will apply throughout the Region and to the entirety of the Growing Together East geography. While the ultimate timeline for approval of the planned AZR is unknown and relies on federal regulators, draft technical work is being finalized with the aim of undertaking public consultation in early 2025. Once the updated AZR is finalized and implemented, all development will be required to adhere to the AZR elevation.

The MTSA's subject to the Growing Together West OPA/ZBA were identified as being located either within the existing AZR area, or otherwise in an area impacted by approach and departure operations. Following initiation of Growing Together East in fall 2024, Regional airport staff worked with a consultant (IDS) to update an aeronautical assessment report that was undertaken for Growing Together West to account for the Growing Together East geography. Maximum values were identified (representing the lowest point at which airport operations are impacted in each MTSA) and presented to the City in correspondence and a meeting with airport staff in fall 2024. Note that the height limitation provided by IDS is the most restrictive height within the MTSA; therefore, a site-specific aeronautical assessment or Land Use application to Nav Canada could determine that additional height is available for a specific development without impacting airport operations.

The following table summarizes impacts of the required height limitations in each Growing Together East station area – note that approximate maximum building heights account for a crane height of 30 metres above the building.

MTSA	Proposed heights, SGA-3	Proposed heights, SGA-4	Maximum elevation (m ASL) – IDS Update, Oct. 2024	Maximum height (approx. storeys)
Block Line	25 storeys	Unlimited	468.8m	32 storeys
Fairway	25 storeys	Unlimited	411.5m	15 storeys
Sportsworld	25 storeys	Unlimited	465.1m	35 storeys

In summary: Regional staff required that the City incorporate the maximum heights for each MTSA established within the aeronautical assessment entitled “Land Use Assessment CYKF – Kitchener/Waterloo, ON, RNAV (RNP) Y RWY 08-RNP0” (prepared by IDS, dated June 2024) into the Growing Together West OPA/ZBA in response to proposed “unlimited” heights in the SGA-C designation and SGA-4 zone. Preliminarily, the same approach is requested for Growing Together East to reflect those heights identified in the IDS update (dated October 2024 and attached to these comments), as it appears from draft materials that height limits have not been specified at this stage. The proposed OPA and ZBA must contain language that clearly indicates that height limits will exist in each MTSA to ensure compatibility with airport operations.

Please be advised as more information become available on the planned AZR, the Region may request an update to these figures to reflect this work and will share this information with the City of Kitchener as soon as it is available.

Grand River Transit & Rapid Transit (ION)

Regional staff representing Grand River Transit (GRT) and Rapid Transit (ION) have been circulated the draft land use and zoning maps, as well as the draft zoning by-law, and are in the process of reviewing these materials with regard to potential impacts Regional transit services, including Phase 2 ION. More specific comments related to GRT and ION will be provided under separate cover in early 2025.

Environmental & Stationary Noise

Policies 2.1.2.1 and 2.1.2.2 of the ROP require that development applications proposing sensitive uses (including residential) account for impacts associated with noise from stationary sources and Regional and provincial transportation corridors and services respectively. Implementation of this policy is typically achieved through the completion of noise studies required as a component of OPA/ZBA applications.

As a key objective of Growing Together East is to reduce the volume of site-specific OPA/ZBA applications that are submitted, Regional staff acknowledge that the City has initiated a study to document background conditions for both transportation and stationary sources throughout the station area, currently being undertaken by a qualified

professional. Regional staff have been made aware of this project and will review and comment on specific recommendations, policies, and area-specific requirements to be identified through this study to ensure that noise is appropriately considered in the enabling policy framework.

Environmental Threats, Records of Site Condition & the Regional Implementation Guidelines for Development Applications on Known or Potentially Contaminated Sites

As a provider of treated water to the City of Kitchener and to ensure the protection of public health and safety for existing and future residents in the Region, Regional Council has adopted the “Implementation Guideline for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated Sites.” The Implementation Guideline requires the submission of a Record of Site Condition and Ministry Acknowledgement Letter for the entirety of lands on which an environmental threat has been identified, in instances where a density increase of a sensitive land use or a non-sensitive land use is proposed.

To determine lands on which an RSC may be required in these MTSAs, an excerpt from the Region’s Threat Inventory Database was provided to City staff in fall 2024. Regional staff understand that this requirement is to be secured through the implementation of holding provisions on lands where threats are most significant.

Hydrogeology & Source Water Protection

Regional staff have reviewed the draft land use and zoning maps and draft ZBA text through the lens of Source Water Protection, in light of ROP policy requirements and obligations under the Clean Water Act. In particular, staff note that the OPA/ZBA must be consistent with the Source Water Protection policies in the Grand River Source Protection Plan for the Region of Waterloo and Chapter 8 of the Regional Official Plan, particularly with respect to managing stormwater, the use of winter de-icing salt, and geothermal wells or earth energy systems. Regional staff recommend the following measures to ensure the proposed amendments provide additional clarity and consistency to these plans:

- Section 11.C.1.37 d) of the proposed Growing Together West Official Plan Amendment contained the following policy: “[The City will] encourage Low Impact Development (“LID”) water management techniques, including materials and plantings that have a high infiltration rate within boulevards and setbacks, to reduce the impact on the city’s stormwater management system”. Regional staff recommend that this policy be replicated for Growing Together East and further state “...only in those areas of the City, and in circumstances where LID is permitted, consistent with the *City of Kitchener Infiltration Policy Update* (Draft June, 2023) of the City’s Stormwater Master Plan.”
- The OPA should generally speak to the need to manage the use of winter de-icing salts to aid in reducing their impact on the environment and the community’s drinking water supply.

- Regional staff note that in Section 19: Site Specific Provisions of the Growing Together West zoning by-law that geothermal wells and earth energy systems were prohibited in a number of zones (e.g. SGA-2, 3, 4 and Mix 1, 3). A former City by-law (by-law 81-1) contained a policy that prohibited private water supply wells and geothermal wells in areas of the City of Kitchener that are serviced by municipal water. Regional staff request that the city implement the same or a similar requirement through the Growing Together East OPA/ZBA to be consistent with the policies in Chapter 8 of the ROP.
- Finally, Regional staff recommend the inclusion of a definition for geothermal wells and earth energy systems in the OPA and ZBA. Appropriate wording can be found in the ROP.

In correspondence with the City in fall 2024, City staff were directed to the most recent source protection mapping for consideration in preparing and refining site-specific requirements associated with this project. The City is asked to advise Regional staff should any questions regarding this mapping arise.

Conclusions

Thank you once again for the opportunity to provide comments regarding the proposed changes. Please do not hesitate to contact the undersigned at wtowns@regionofwaterloo.ca with any questions.

Yours truly,



Wil Towns, RPP
Senior Planner

Encl: Excerpts from Community Building Strategy – Block Line, Fairway and Sportsworld Station Areas (Region of Waterloo, 2013) and mapping, Place-making Strategy (Dillon Consulting, 2019)
Aeronautical Assessment, Growing Together East Station Areas (IDS, 2024)

Cc: Matthew Rodrigues, Senior Planner (Policy), City of Kitchener
Adam Clark, Senior Urban Designer, City of Kitchener
Alyssa Bridge, Manager, Development Services, Region of Waterloo

2024 IDS AERONAUTICAL ASSESSMENT FOR KITCHENER MTSAs

Task Description

- The objective of this study is to determine the ceiling (maximum permissible height) for 12 Areas located in the vicinity of Kitchener/Waterloo Airport and provided in a Google earth file named “Kitchener MTSA Analysis”.



Figure 1 : 12 Zones designated as MTSA Area 1 to 12

IDS North America Ltd.

idsna@idscorporation.com - www.idscorporation.com/na

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155 Terence Matthew Crescent,
Ottawa, Ontario K2M 2A8, Canada

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Aeronautical Data

- The relevant existing and planned approaches were analysed (LPV effective July 11th).
- The most recent Criteria for the Development of Instrument Flight Procedures was applied for this study.

RNAV (RNP) Y RWY 08

Figure 2 below shows the areas relative to the RNAP RNP 0.15 RWY08.

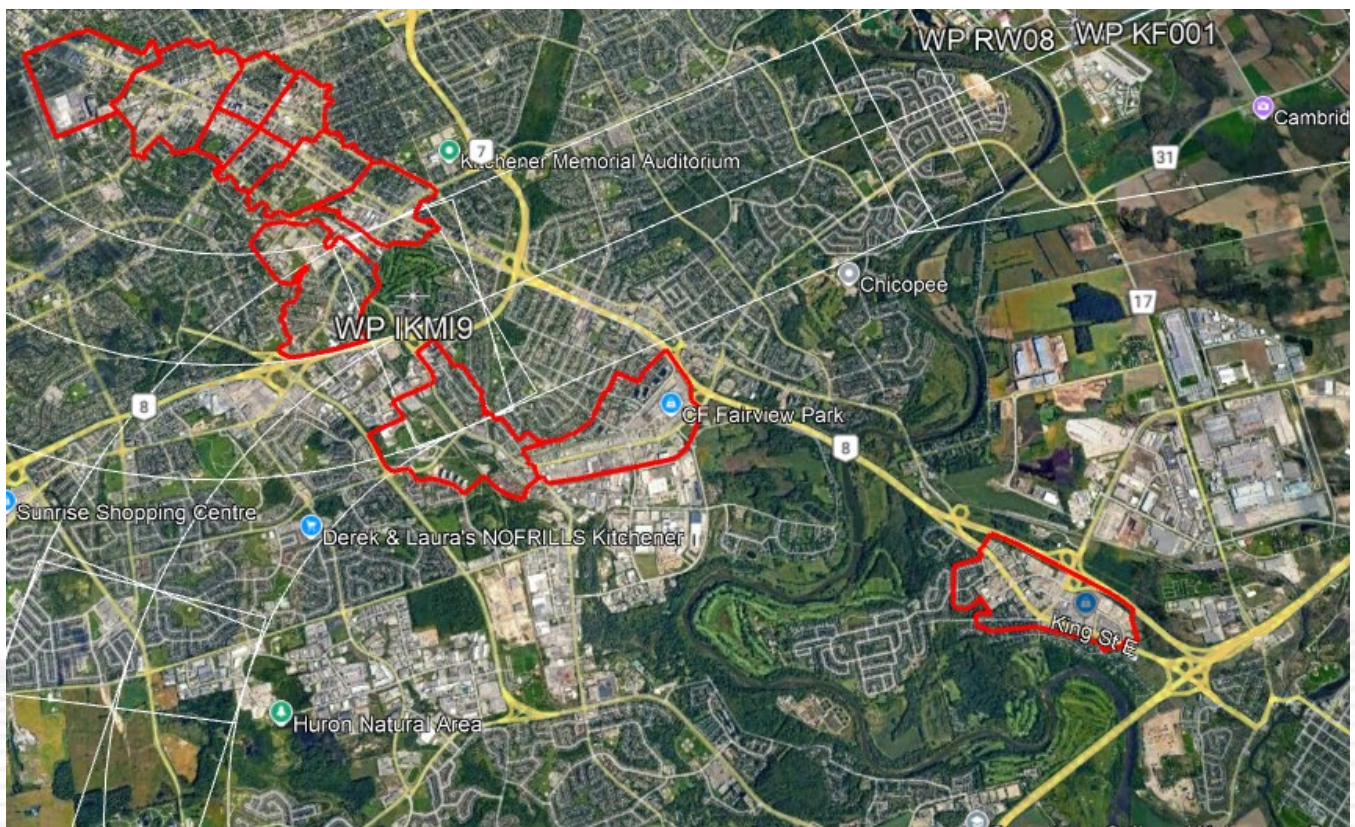


Figure 2 Relative positions of the studied Areas Vs
RNAV RNP 0.3 RWY 08 at CYKF

Some of the areas are within the Intermediate Segment of the IAP. The intermediate allows for a maximum altitude of 1800' ASL. Some areas lie beneath the Final segment of the 0.3 RNP and only Blockline lies below the 0.15 RNP, allowing for a maximum altitude of 1794' ASL to 1,800' ASL.

EXISTING LPV RWY 08

Figure 3 below shows the relative positions of the 12 Areas relative to the LPV RWY 08. Most of the areas are in the intermediate segment of the IAP. Some also lie beneath the Final segment (Borden in the secondary area, and Blockline with a very small portion in the primary area) restricting the areas maximum allowable height between 1691' and 1800'. Fairway and Sportsworld are outside the LPV surfaces.



Figure 3 Relative positions of the studied Areas Vs LPV RWY08 at CYKF



Figure 3a: Relative position of the studied areas relative to the LNAV RWY 08

DEPARTURES OFF RUNWAY 26

Figure 4 shows the relative positions of the 12 areas relative to the Departure Obstacle Evaluation Surfaces. All 12 areas are outside the Initial Climb Area (ICA). They all lie inside Area A almost straight ahead or right of the runway direction.



Figure 4 Relative positions of the 10 areas relative to the Departure RWY 26

Based on the shortest distance between each area and the ICA, the ceiling height of each area would be limited to a height of 1,418' to 1,751' ASL.

SUMMARY

The following Table shows the most restrictive ceiling height limitation (in Yellow) according to each IAP.

TABLE 1 – Summary of ceiling height limitation for each area (Ft ASL)

AREA		RNP RWY 08	LPV RWY 08	LNAV/VNAV RWY08	LNAV RWY08	DEPARTURE* RWY 26
No 1	Grand River Hospital	N/A	1,773	1,800	1,800	1,751
No 2	Central	N/A	1,773	1,800	1,800	1,683
No 3	Kitchener City Hall	N/A	N/A	1,800	1,800	1,638
No 4	Frederick	N/A	N/A	1,800	1,800	1,606
No 5	Victoria Park	N/A	1,773	1,800	1,800	1,666
No 6	Queen	N/A	1,773	1,800	1,800	1,637
No 7	Kitchener Market	N/A	1,773	1,800	1,800	1,577
No 8	Borden	1,794	1,773	1,739	1,800	1,534
No 9	Mill	1,800	1,773	1,800	1,800	1,600
No10	Blockline	1,800	1,691	1,742	1,800	1,538
No11	Fairway	N/A	N/A	1,587	1,350***	1,418
N012	Sportsworld	N/A	N/A	N/A	N/A	1,526**

Note that other Instrument Flight Procedures apply to the MTSA areas noted above, however they are less restrictive than the critical height identified.

*: A The Departure Rwy26 was evaluated using the latest TP308 Change 8.1 which accounts for the clearway. This was done in order to protect for future changes.

**: the current departure is more restrictive to Sportsworld MTAS, then the new criteria, which will restrict the height to 1,578'.

***: A very very small portion of the Fairway MTSA area falls in the primary area of the final section of the LNAV RWY 08 limiting its entire height to 1,350'.

5.7 Sportsworld



Community Building Strategy

The Sportsworld Station Area is expected to remain auto-oriented but new uses including office and retail development will help to fill in large areas of surface parking to make the area more comfortable for pedestrians, cyclists and transit users.

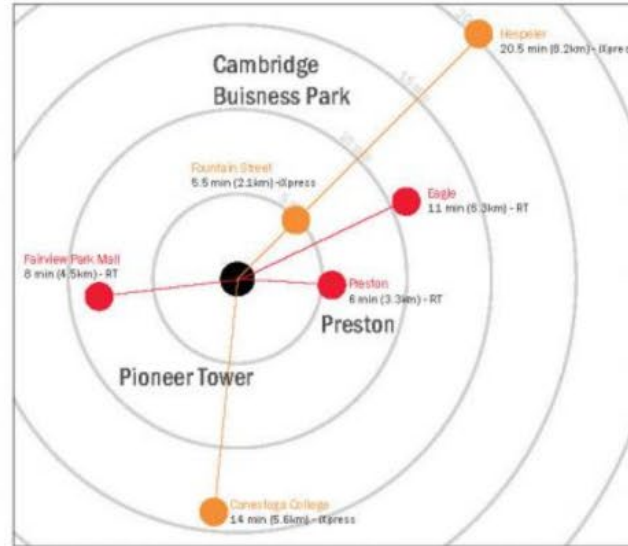


The Station Context — iXpress — LRT — Active Transportation (existing) — LRT Platform — aBRT — Active Transportation (planned)

The Station Area Today

The Sportsworld Station Area is primarily an auto-oriented retail and commercial centre comprised of:

- Sportsworld Crossing Centre
- Big box stores with large areas of surface parking
- Stand alone pad restaurants
- Low rise office developments with retail uses at grade
- Sportsworld Arena
- The large on/off ramps connecting Highway 8 to Sportsworld Drive
- A mix of industrial and employment uses east of Highway 8 including the Region of Waterloo's Public Works, EMS and Police Services buildings



Future Travel Times to Area Neighbourhoods and Destinations

The Existing Policy Framework

The Station Area is part of a Commercial Node in the 2011 City of Kitchener First Preliminary Draft Official Plan.

The Future Transportation Network

In the short-term, the station will consist of a northbound and southbound aBRT shelter and platform on the west of Sportsworld Drive. The station will connect with iXpress services east through the Cambridge Business Park to the village of Hespeler, west to Conestoga College and south to the Village of Preston. In the future the aBRT will be converted to LRT service running along the existing rail corridor to the east of Highway 8 facing Maple Grove Road.

How the Transit Station Will Be Used

- To access Sportsworld Crossing shopping centre and community facilities
- To access the Deer Ridge and Pine Grove neighbourhoods
- As an employment gateway to iXpress services leading to the Cambridge Business Park, Hespeler Village and Conestoga College

What Would Support the Station Area by 2015

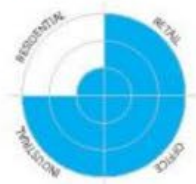
- Enhanced station facilities designed to comfortably accommodate riders accessing the station during off peak and late night hours (Lead: GRT and GO)
- Expand on existing local feeder service to provide access between the station and employment uses east of Highway 8 (Lead: GRT)
- Improved pedestrian access with sidewalks and designated crossing points along Sportsworld Drive, Gateway Park Drive and other key streets leading to and from the station to enhance access for pedestrians (Lead: City of Kitchener and Region)

The Role and Evolution of the Place Along the Corridor

- The area will remain a predominantly auto-oriented, mixed commercial retail centre
- East of Highway 8 vacant parcels of land will create an opportunity for office development that will complement existing employment uses and future LRT
- There will be an opportunity to improve bus service to Cambridge Business Park from the Sportsworld Station
- Large areas of surface parking and underutilized retail uses will create an opportunity for redevelopment and the introduction of new office and retail uses west of Highway 8
- Over the long-term, the introduction of LRT creates the opportunity for a transit-oriented employment corridor within the Cambridge Business Park and in particular along Maple Grove Road

Key Considerations

The Market



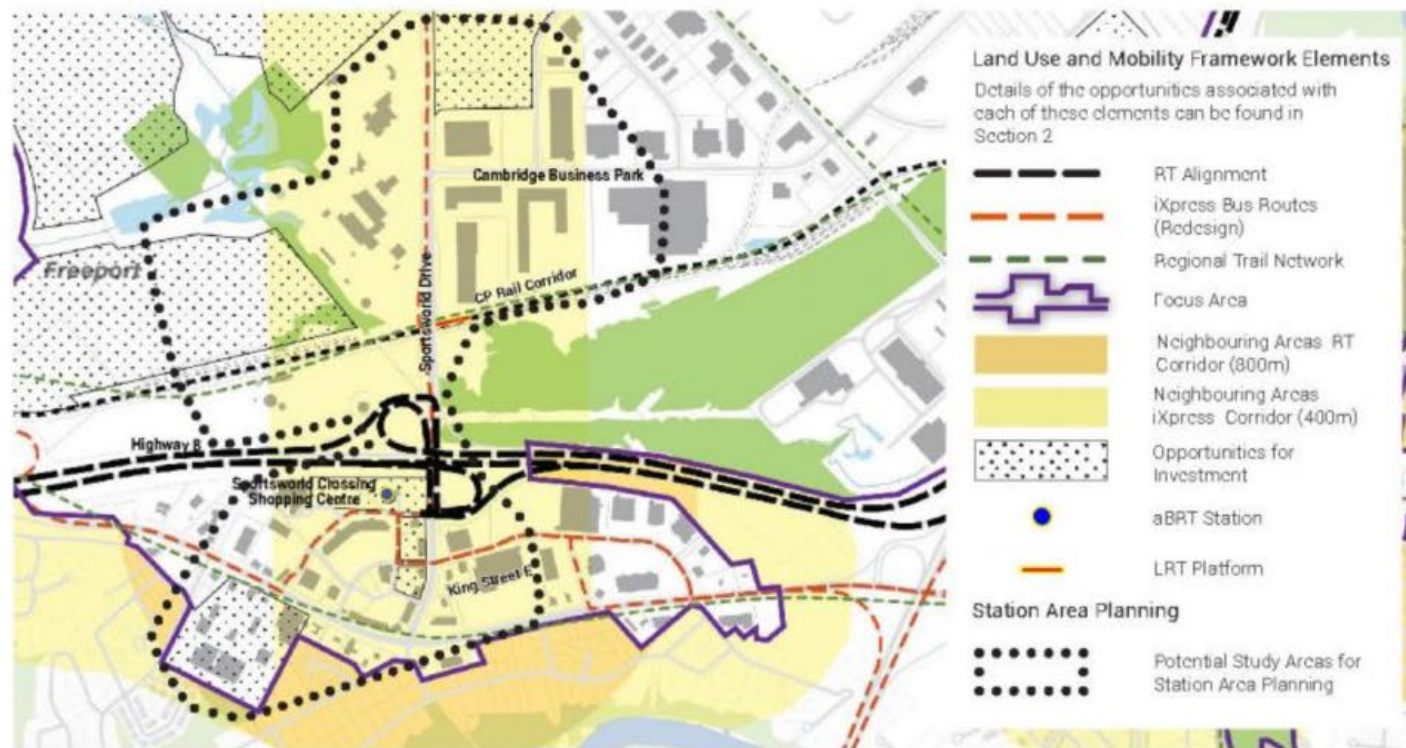
- The Station Area is located within the **Sportsworld Market Area** (Section 2.3) and is **Market Ready** (Section 7.1)
- Easy access to Toronto while being central to Waterloo Region and Guelph will help to support the office market
- By 2031, an increase in the demand for office space will launch new office development. Prestige, class 'A' industrial spaces will continue to draw tenants. Mid-density residential development may grow in the longer term

Built Form and Land Use

- The area to the west of Highway 8 has been identified as a **Commercial Reurbanization Area** (Section 3.2). The area is appropriate for a mix of office, commercial and retail building types and uses ranging from low rise employment/industrial buildings to mid-rise office buildings with retail at street level
- The area to the east of Highway 8 has been identified as an **Employment District** (Section 3.2)

Mobility

- Over the longer term, new development within the Focus Area should help to create a finer grained network of streets and blocks
- The station should be considered a candidate site for a higher level of passenger amenities such as washrooms and heated waiting areas in order to support employees accessing the station during off peak hours
- There is an opportunity to ensure good connections to regional trails to the east and west side of the station
- The provision of additional cycling amenities at the station including bike lockers and the extension of bike lanes along Sportsworld Drive and east along Maple Grove Road would help to support employees wishing to bike to work from the station
- Candidate for Park-and-Ride facility with potential to seek share agreements on under-utilized private lots



The Station Area within the Land Use and Mobility Framework

- Parking within the Station Transfer Zone should be provided in shared, structures that integrate active uses fronting onto streets and key pedestrian routes
- Implement Universal Transit Pass for all district employees

Public Realm

- Improving the pedestrian and cycling environment along Sportsworld Drive from King Street to Cherry Blossom Road would help pedestrians access the RT station from neighbourhoods and employment areas
- Streetscape improvements for the Highway 8 underpass including the provision of sidewalks on both sides of the street, splash walls and enhanced pedestrian lighting would help to improve connections for pedestrians accessing the station from east of Highway 8
- New public spaces with potential adjacency to the station would contribute to placemaking and become an amenity for transit riders, pedestrians, and cyclists

Community Building Initiatives

Through the course of the Community Building Strategy process several Initiatives were identified for this station area. These are outlined in detail in Section 4 and include:

- #24 Develop a transit-supportive Cambridge Business Park and future employment area
- #25 Strengthen the link between the Region of Waterloo International Airport and Cambridge Business Park, Fairview Park Mall and the South Kitchener Business Park
- #26 Enhance the experience of taking transit for employees of the Cambridge Business Park
- #27 Improve the relationship of retail and employment uses in Sportsworld with the Station
- #28 Improve connections between the King Street corridor and the RT Network

5.8 Fairview Park Mall



Community Building Strategy

The Fairview Park Mall Station Area has the potential to be transformed into a high density, mixed-use residential, office and retail centre over the longer term supported by a walkable, cycling and transit-supportive environment.

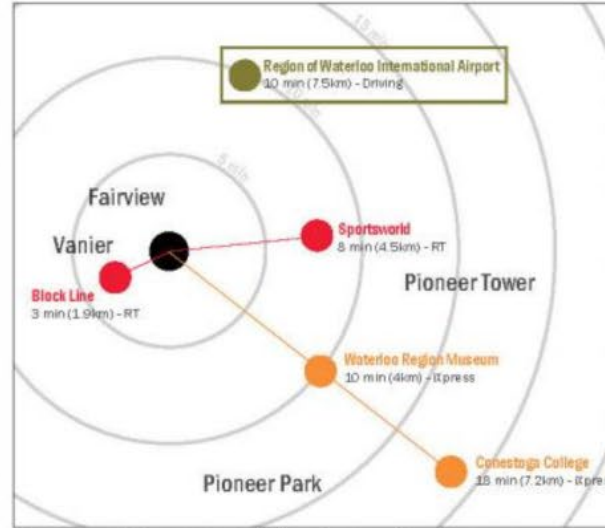


The Station Context

The Station Area Today

The Fairview Park Mall Station Area is primarily traditional regional shopping centre comprised of a large mall and big box retail corridor surrounded to the north by low-high rise neighbourhoods. The defining characteristics of the area include:

- The Fairview Park Mall, which is located immediately adjacent to the station
- Large format and strip retail uses along Fairway Road
- Several higher density residential apartment and townhouse developments north of Kingsway Drive
- A poor walking and cycling environment with large blocks and limited crossing points along Fairway Road



Future Travel Times to Area Neighbourhoods and Destinations

The Existing Policy Framework

The Station Area is part of a Mixed-Use Activity Node in the 2011 City of Kitchener First Preliminary Draft Official Plan. It is designated as a Mixed-Use, High Density Residential and Commercial Corridor.

The Future Transportation Network

The station will consist of one center platform in the hydro corridor right-of-way, in the current Fairview Park Mall parking lot west of the Bay store. It will act as a major transit interchange with connections to iXpress services connecting to Conestoga College and numerous local bus connections. Prior to the extension of LRT to Cambridge, the station will be the interchange between the LRT and aBRT services.

How the Transit Station Will Be Used

- As transfer point between LRT and aBRT services until the LRT is extended into Cambridge.
- As an important GRT terminal providing access to numerous local bus routes
- As a gateway to iXpress services leading to Conestoga College
- As a Park-and-Ride facility

What Would Support the Station Area by 2017

- A well designed station with consideration for placemaking, visibility, and pedestrian amenities (Lead: RT, City of Kitchener and Cadillac Fairview)
- Direct pedestrian connections between the RT platforms and aBRT platforms and the neighbourhoods north of Kingsway Drive (Lead: RT and Cadillac Fairview)
- Sidewalks along the length of Fairway Road east to King Street (Lead: City of Kitchener and Region)
- Direct pedestrian connection between the RT platforms, bus and aBRT platforms and the primary Mall entrance (Lead: RT and Cadillac Fairview)

The Role and Evolution of the Place Along the Corridor

- In the short-term the consolidation of access drives and re-striping of surface parking lots will help to create a pseudo-street and block network supporting access for pedestrians
- The area will be a significant mixed-use centre along the RT corridor and an important hub within the transit network
- Large areas of surface parking and underutilized retail sites will be redeveloped over time with higher density retail and residential uses
- East of Wilson the area will emerge into a higher density residential community with retail uses at street level
- West of Wilson urban format retail uses will address the street and accommodate parking to the rear, below grade or in shared structured parking lots with retail facing the street
- Introducing a finer grained street and block pattern that supports walkability and creates the potential for an outdoor shopping experience

Key Considerations

The Market



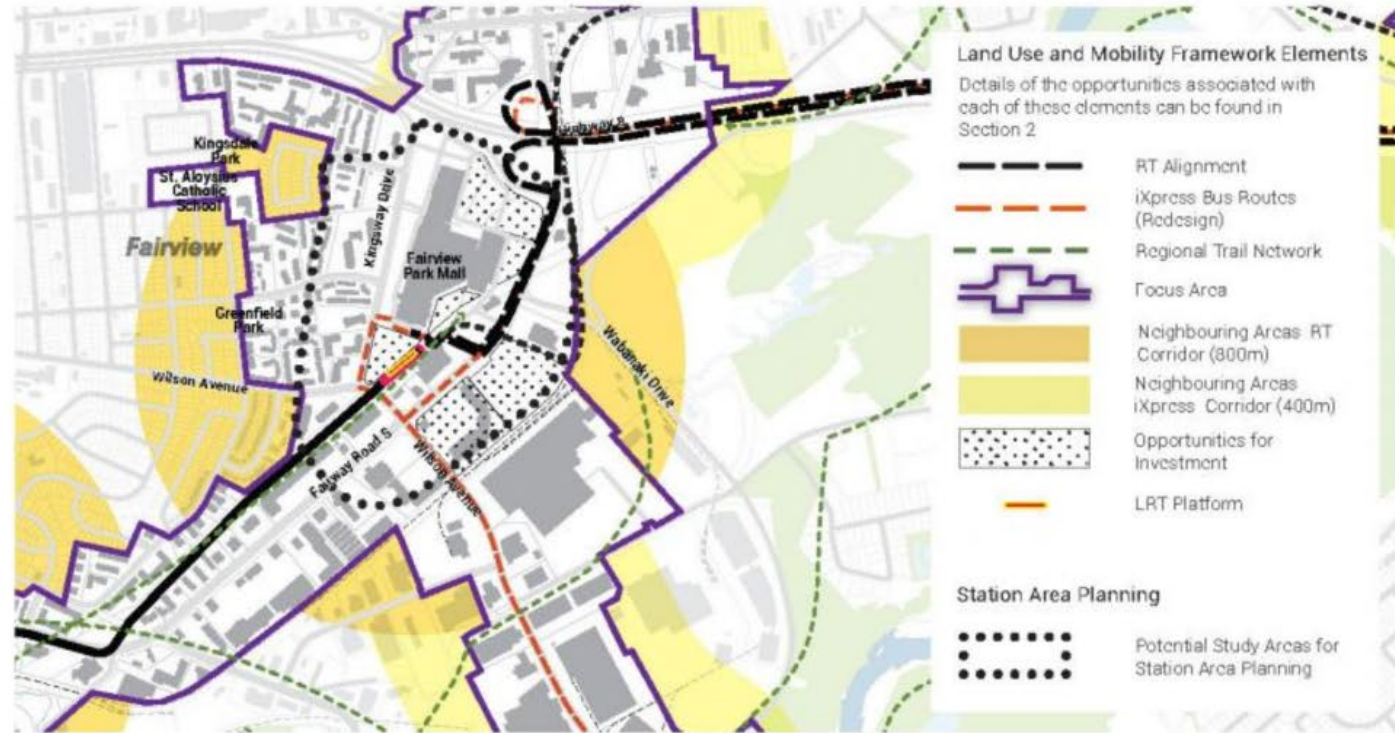
- The Station Area is located within the **Fairview Market Area** (Section 2.3)
- By 2017, underutilized retail sites are likely to be redeveloped
- By 2031, functionally obsolete industrial facilities are anticipated to be demolished and retail buildings will likely be recycled without the creation of additional square footage

Built Form and Land Use

- The area around the Fairview Park Mall has been identified as a **Shopping Centre** in the Community Building Strategy (Section 3.2)
- The area along Fairway Road has been identified as a **Commercial Reurbanization Area** (Section 3.2). The transformation of this station area is illustrated in Section 6
- The area is appropriate for a mix of building types ranging from low to mid-rise retail/office development west of Wilson to high rise mixed-use or residential development on mid-rise podiums east of Wilson Avenue
- The tallest buildings should be centred on the intersection of Fairway Road and Wilson Avenue
- New development adjacent to the station along Fairway Road should help to preserve for the creation of a new open space that can connect the station to Fairway Road
- New development at the northeast corner of Wilson and Fairway Road should be setback slightly to support higher levels of pedestrian traffic coming to and from the station areas

Mobility

- The station has been identified as the location of a Park-and-Ride facility. The facility should be sited to allow for direct pedestrian access to the station from residential areas to the north and designed with active at-grade uses along pedestrian promenades and adjacent to the station
- The hydro corridor has been identified as the location of an off street cycling route heading west to Blockline station. Connections should be made between this route and Fairway Road periodically



The Station Area within the Land Use and Mobility Framework

- New development within the Focus Area should help to create a finer grained network of streets and blocks over time
- A new east-west connection south of Fairway Road would help to create a more walkable street and block structure and relieve pressure from Fairway Road
- New crossings of Fairway Road should be introduced east of Wilson Avenue over time to enhance station access
- Sidewalks should be continued along the length of Fairway Road east to King Street
- Planned Park-and-Ride facilities should encourage shared use and integrate active, at-grade uses along key pedestrian routes
- Redevelopment of the Mall site or along Fairway Road should locate parking away from transit and pedestrian priority areas and encourage shared parking that is integrated into new development

Public Realm

- Existing generous boulevards along Fairway Road create an opportunity for the planting of a double row of trees that will transform the image of the street
- An opportunity exists for a new station-related open space to the south of the station that will help to connect the station with Fairway Road

Community Building Initiatives

Through the course of the Community Building Strategy process several Initiatives were identified for this station area. These are outlined in detail in Section 4 and include:

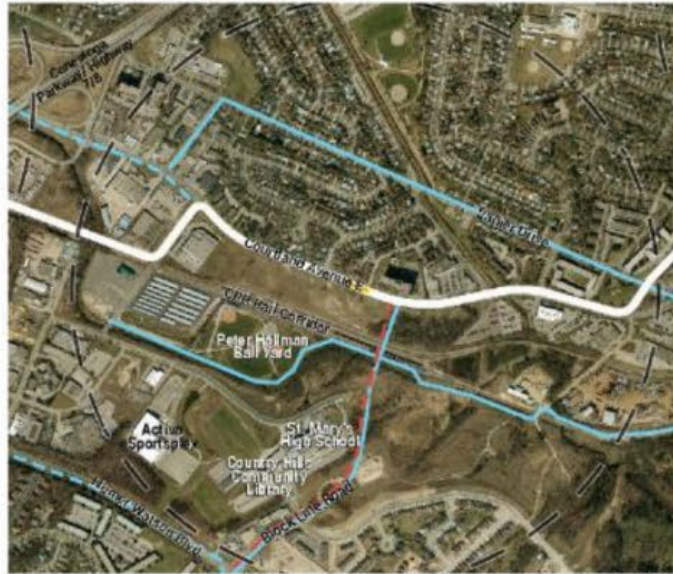
- #28 Improve connections between the King Street corridor and the RT Network
- #29 Improve connections between Chicopee and the RT
- #31 Transform Fairview Park Mall into a walkable mixed-use centre
- #32 Improve the relationship of the Fairview neighbourhood to the Fairview Park Mall Station
- #33 Support the reurbanization of Fairway Road over time

5.9 Block Line



Community Building Strategy

The extension of Block Line Road and termination of the iXpress routes at this station will create an important transfer point for passengers heading to and from the west.



The Station Context

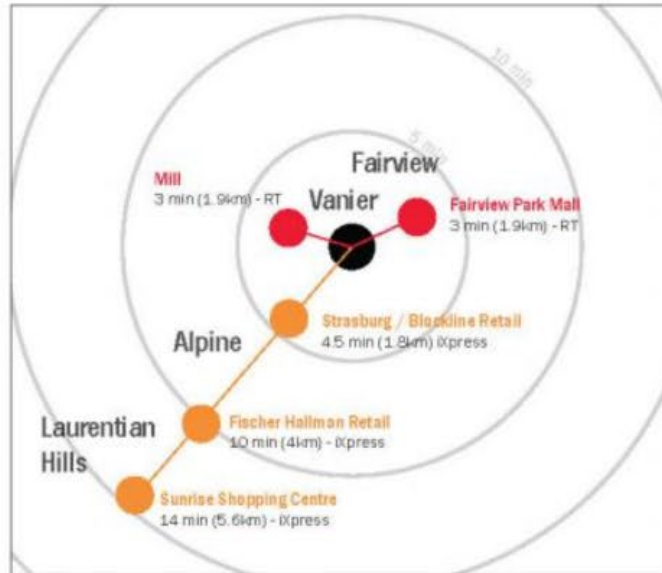
Legend: iXpress (red line), LRT Platform (yellow line), LRT (grey line), 2BRT (blue line), Active Transportation (existing) (green line), Active Transportation (planned) (light blue line).

The Station Area Today

The Block Line Station Area is surrounded by residential neighbourhoods and south of the station is a community facility cluster.

The defining characteristics of the area include:

- The Vanier and Fairview neighbourhoods which comprise the eastern half of the station area
- The large embankment to the west of Courtland Avenue leading down to the rail corridor
- The Active Sportsplex and ball diamonds along Lennox Lewis Way
- St. Mary's High School
- Country Hills Community Library
- Vacant parcels of land on west side of Courtland Avenue



Future Travel Times to Area Neighbourhoods and Destinations

The Existing Policy Framework

Part of the Station Area is designated as a Neighbourhood Mixed-Use Centre in the 2011 City of Kitchener First Preliminary Draft Official Plan. The area is also designated High Density Residential and General Industrial Employment.

The Future Transportation Network

The station will consist of one center platform within the boulevard on the western edge of Courtland Road. Following the extension of Block Line Road from Lennox Lewis Way to Courtland Avenue, the station will become a major transfer point for iXpress buses serving neighbourhoods to the west.

How the Transit Station Will Be Used

- As a major transfer point between the RT and iXpress services serving the western half of Kitchener and Waterloo
- As a neighbourhood access point
- As an access point to the recreational facilities and high school along Lennox Lewis Way

What Would Support the Station Area by 2017

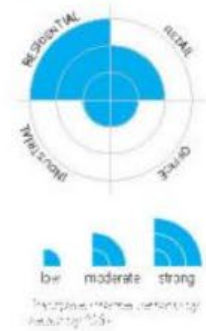
- A station well integrated within the development on Courtland Avenue (Lead: RT, GRT and land owners/developers)
- The integration of pedestrian and cycling facilities in the design of the new Block Line Road extension (Lead: City of Kitchener)
- A new traffic signal and intersection located at Block Line and Courtland Avenue to make it safer for pedestrians from the Vanier and Fairview neighbourhoods to access the station (Lead: Region)
- The provision of sidewalks along the western side of Courtland Avenue (Lead: City of Kitchener and Region)

The Role and Evolution of the Place Along the Corridor

- The character of existing stable neighbourhoods will be preserved
- Areas of undeveloped land adjacent to the station west of Courtland may be redeveloped for commercial and neighbourhood retail uses, ideally well integrated with transit service
- Underutilized sites such as the shopping plaza and car sales lot at Courtland Avenue and Shelley Drive may be redeveloped over time to higher density residential or commercial uses with retail at street level

Key Considerations

The Market



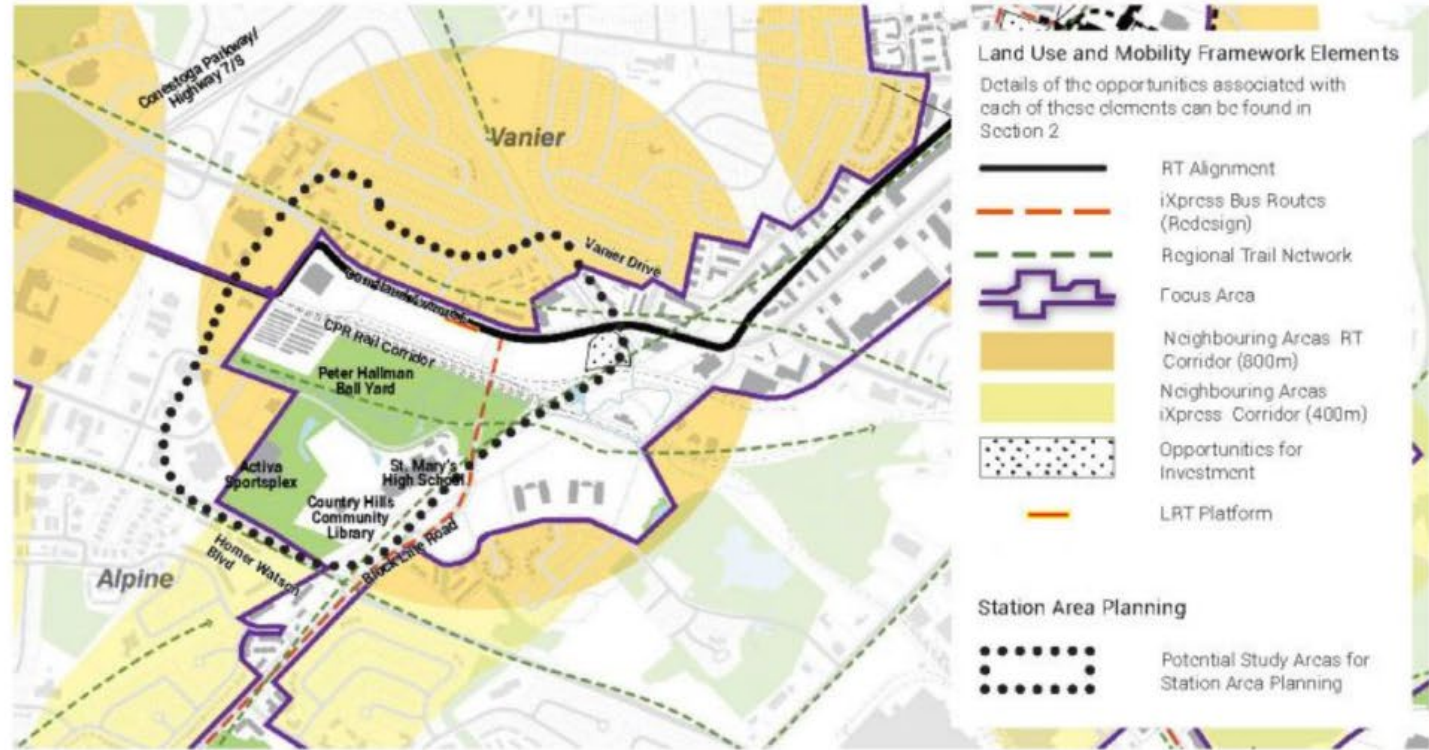
- The Station Area is located within the **Block Line Market Area** (Section 2.3)
- By 2017, the demand for low and medium density housing in the area will remain strong
- By 2031, higher density residential is expected to be built and functionally obsolete industrial facilities will likely be demolished

Built Form and Land Use

- The area has been identified as an **Avenue** (Section 3.2)
- The area is appropriate for a mix of building types ranging from mid-rise residential and/or office development with retail at street level on Courtland Avenue to high rise residential development on mid-rise podiums west of Courtland
- The tallest buildings should be located to the west of Courtland Avenue across from the shopping mall and plaza
- New development east of Courtland Avenue should transition in scale down to the low-rise residential housing in the Vanier neighbourhood
- Opportunities to integrate new development west of Courtland with the RT station and bus terminal should be explored
- Development adjacent to the station should be situated to facilitate direct connections between RT and bus services and the community to the east
- New development should be positioned to facilitate the operations of iXpress buses

Mobility

- The station is an important access point to the regional active transportation network. New development should provide access to and preserve for the extension of the active transportation network over time
- The design of Block Line Road extension should create good pedestrian and cycling connections from recreational and school facilities to the station



The Station Area within the Land Use and Mobility Framework

- The creation of a master plan to maximize access and connections within the recreational and community facilities could help overcome the barrier of the embankment between the station and these facilities
- A new crossing of Courtland Avenue should be introduced to improve pedestrian connections between the station and adjacent neighbourhood
- Sidewalks should be extended along both sides of Courtland Avenue
- Shared parking integrated into new development
- Implement Residential Parking Benefit District if park-and-hide is a concern

Public Realm

- The generous boulevards along Courtland Avenue creates an opportunity to plant new street trees adjacent to the street

Community Building Initiatives

Through the course of the Community Building Strategy process several initiatives were identified for this station area. These are outlined in detail in Section 4 and include:

- #35** Integrate new and existing development with the Block Line Station
- #36** Complete a network of trails that extend throughout the region

Community Building Strategy

Figure 12: Urban Greenlands System Opportunities within the C.T.C.

Place-Making Strategy

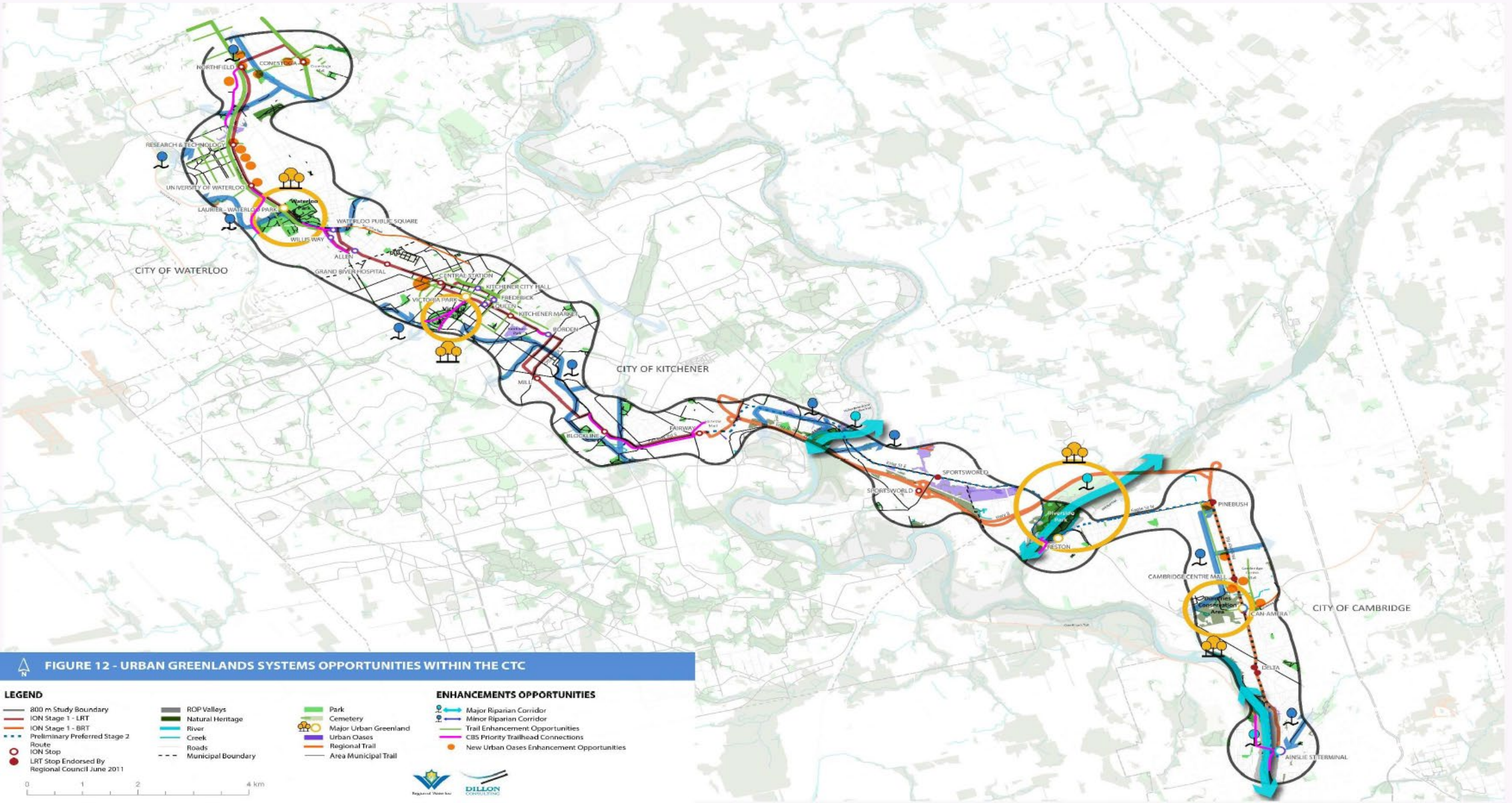
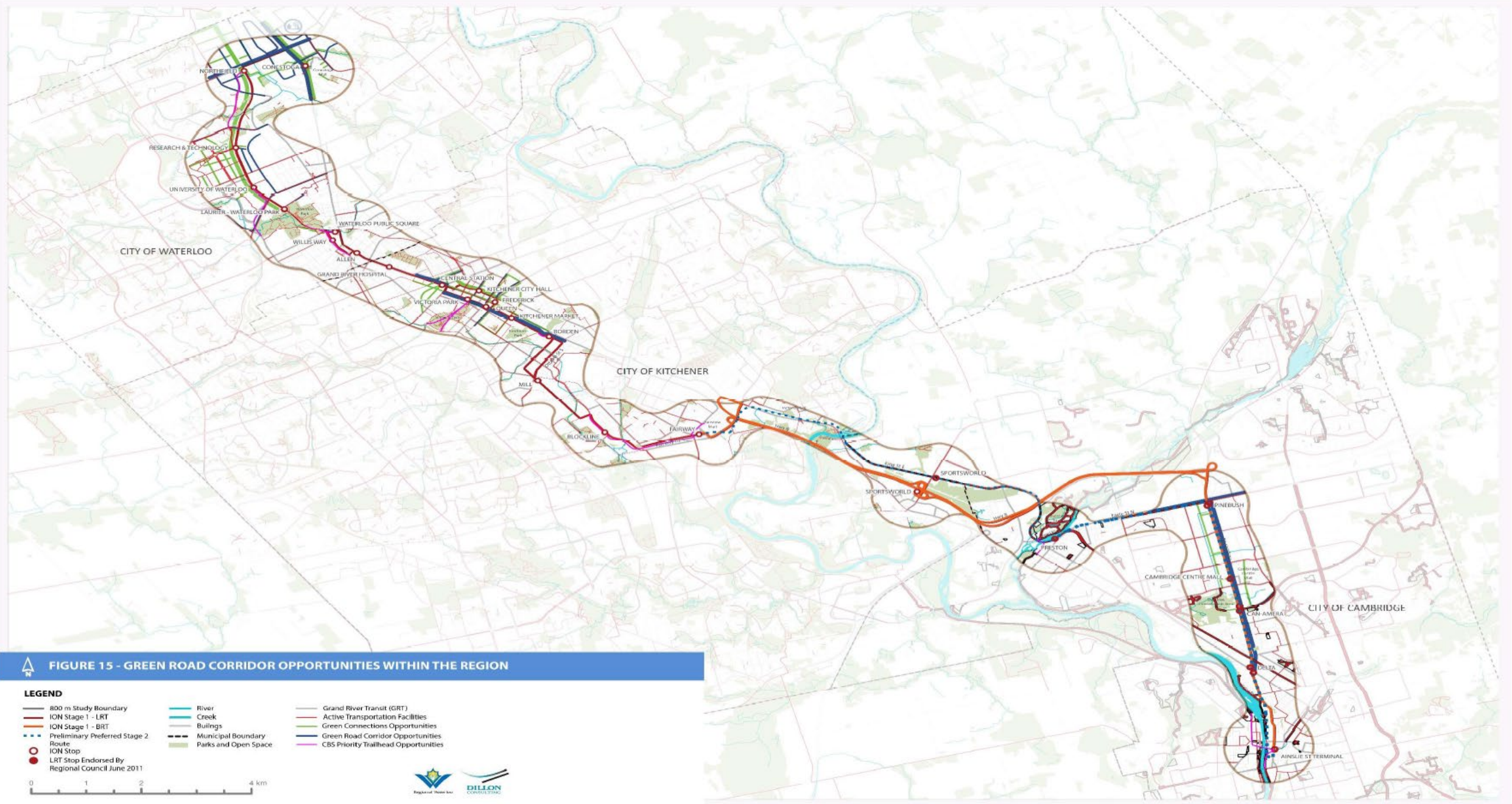


Figure 15: Green Road Corridor Opportunities within the C.T.C.

Place-Making Strategy



From: [Jennifer Passy](#)
To: [Growing Together \(SM\)](#)
Subject: Re: Growing Together East
Date: Wednesday, November 6, 2024 2:35:10 PM

You don't often get email from [REDACTED] [Learn why this is important](#)

Thanks Matt! I was in the midst of webpage edits myself earlier today... I can appreciate how this may happen!

Looking forward to seeing the latest info when it is available.

Jennifer

From: Growing Together (SM) <GrowingTogether@kitchener.ca>
Sent: November 6, 2024 2:20 PM
To: Jennifer Passy [REDACTED]
Subject: RE: Growing Together East

Caution - External Email - This Message comes from an external organization. Do NOT click on unrecognized links or provide your username and/or password.

Hi Jennifer,

Thanks for the note. You're catching us updating the page in real-time. That date is no longer applicable, and a detailed Engage page post will be made available shortly with all of the materials – likely this week. An update will be sent to all subscribers once available.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

The City of Kitchener is modernizing its phone system, and beginning **November 12, 2024** you can reach me directly at **519-783-8946**.

From: Jennifer Passy [REDACTED]
Sent: Wednesday, November 6, 2024 1:24 PM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together East

■

You don't often get email [REDACTED] [Learn why this is important](#)

Good afternoon Team,

Can you please share the draft land use plans for Growing Together East. The supporting documents on Engage include only the draft zoning, and I understand that the commenting deadline on the land use and zoning is November 30th.

Thank you,

Jennifer Passy, BES, MCIP, RPP (she/her)
Manager of Planning
Waterloo Catholic District School Board



**Waterloo Catholic
District School Board**

[My workday may look different from your workday.](#)

[Please do not feel obligated to respond outside of your normal working hours.](#)

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November 25, 2024

Growing Together East Team
City of Kitchener
200 King Street West
Kitchener ON N2G 4V6
growingtogether@kitchener.ca

**Re: Growing Together East
Southeast Kitchener**

The Grand River Conservation Authority (GRCA) is in receipt of the draft mapping in support of the official plan / zoning by-law amendments (OPA / ZBA) for the City's Growing Together East project.

The GRCA has reviewed this application under Ontario Regulation 686/21, acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a public body under the Planning Act, as well as in accordance with Section 6.C.2 of the City of Kitchener's Official Plan (OP), Ontario Regulation 41/24, and GRCA's Board approved policies.

After reviewing the draft maps, we offer the following comments.

Floodplain Zoning

Maps for the Block Line Major Transit Station Area show the regulatory floodplain for Schneider and Montgomery Creeks. In contrast to Growing Together in the Rockway area, these floodplains are One-Zone Floodplain Policy Areas. No new development is permitted in these areas. Any minor changes must be associated with existing uses, and no modifications to the floodplain would be permitted. One Zone Floodplain Policy Areas should not be used to accommodate intensification and higher-density uses typically associated with Strategic Growth Areas (SGAs).

For this reason, the GRCA recommends that SGA land use designations or zoning not be applied where the floodplain is present. We recommend that the City consider keeping the Natural Heritage Conservation (NHC) designation and/or Existing Use Floodplain (EUF) zoning where current development exists in the floodplain if there is no desire by the City to bring it into the Open Space system. We trust that Section 17.E.1 of the OP and Section 1.9 of the zoning bylaw would allow for minor revisions to the NHC / EUF and SGA boundary if landowners completed topographic surveys to refine the floodplain extent.

Other Hazards

There are other associated wetlands and riverine slope hazards, as well as allowances to these regulated features within the project area.

- The City may wish to designate / zone wetlands within the floodplain as NHC rather than as open space.
- Riverine slope hazards and GRCA's regulated allowances to all features can be sufficient covered by appropriate zoning overlays.

We trust this information is of assistance and are happy to provide further advice as the project progresses. If you have any questions or require additional information, please contact me at 519-621-2763 ext. 2292 or theywood@grandriver.ca.

Sincerely,



Trevor Heywood
Resource Planner
Grand River Conservation Authority

cc: Environmental Planning, City of Kitchener

From: [Trevor Heywood](#)
To: [Growing Together \(SM\)](#)
Cc: [Carrie Musselman](#); [Barbara Steiner](#)
Subject: Re: Growing Together East, Draft Land Use and Zoning
Date: Monday, November 25, 2024 9:04:33 AM
Attachments: [2024-11-25 Kitchener Growing Together East GRCA comments 2.pdf](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi there,

Please see the GRCA's response to this circulation attached.

Regards,

Trevor Heywood B.Sc.(Env.)
Resource Planner
Grand River Conservation Authority



www.grandriver.ca | [Connect with us on social media](#)

From: Growing Together (SM) <GrowingTogether@kitchener.ca>
Sent: Friday, November 8, 2024 5:14 PM
Subject: Growing Together East, Draft Land Use and Zoning

Good Afternoon,

You are receiving this email as a member of the Growing Together contact list. On March 18th 2024, Kitchener City Council approved the Growing Together planning framework for 7 of Kitchener's 10 Major Transit Station Areas (MTSAs). Staff are now working on the next phase of the project, known as Growing Together East, which will be implementing a similar framework for the 3 remaining MTSAs; Block Line, Fairway and Sportsworld. Draft land use and zoning mapping for these 3 station areas is now available at engagewr.ca/growingtogether. Please note that this will be the only notification of the Growing Together East project that is provided to this contact list via email. For all future updates, including opportunities to meet with staff and provide comment, please register at engagewr.ca/growingtogether.

Thank you!

The Growing Together Team

From: [Matthew Rodrigues](#)
To: [MTO - Jeremiah Johnston \(Jeremiah.Johnston@ontario.ca\)](#)
Cc: [Adam Clark](#); [Elyssa Pompa](#); [Robert Keel](#); [Chris Sidlar](#); [Elisabeth Hofbauer-Spitzer](#)
Subject: RE: Growing Together East Agency Circulation
Date: Monday, March 3, 2025 7:58:19 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Good morning Jeremiah,

Thank you for the update on MTO's review of the documents. Would you be able to provide comments by March 10, as we are working towards an April meeting of Council to consider the various amendments? If not, please let me know when you are expecting to provide comments.

Please let me know. Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

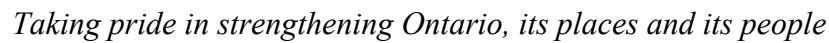
From: [REDACTED]
Sent: Friday, February 28, 2025 4:09:01 PM
To: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East Agency Circulation

Hello Christine,

MTO is reviewing the documents that have been circulated and will provide comments at a later date.

Thank you,

Jeremiah Johnston
Corridor Management Planner | Highway Operations Branch
Ministry of Transportation | Ontario Public Service
[REDACTED]



Sent: Tuesday, February 11, 2025 11:58 AM

To:

A public open house will be held on Feb. 26 from 4-7p.m. and availability for one-on-one landowner meetings has been made available.

If you have any questions, please contact growingtogether@kitchener.ca.

Christine Kompter

Administrative Assistant | Development Services Department - Planning | City of Kitchener

200 King Street West, 6th Floor | P.O. Box 1118 | Kitchener ON N2G 4G7

519-783-8147 | TTY 1-866-969-9994 | christine.kompter@kitchener.ca



From: [Shannon Torcato](#)
To: ["Alex Summer"](#); ["Brad Trussler"](#); ["Craig Robson"](#); ["Hitesh Lad"](#); ["Scott Schweyer"](#); ["icabral"](#); ["Jason Malfara "](#); ["Maria Kveris"](#); ["Matt Ninomiya"](#); ["Pierre Chauvin"](#); ["Stephen Litt "](#); ["vbender@rbjschlegel.com"](#); ["Kevin Muir"](#); ["marie-schroeder@wrhba.com"](#); [Carlos Reyes](#); [Chris Spere](#); [Garett Stevenson](#); [Janine Oosterveld](#); [Justin Readman](#); [Mike Seiling](#); [Natalie Goss](#); [Rosa Bustamante](#); [Tina Malone-Wright](#); [Tim Benedict](#)
Cc: [Adam Clark](#); [Matthew Rodrigues](#)
Subject: KDLC January Updates
Date: Tuesday, January 21, 2025 9:34:40 AM
Attachments: [Draft Zoning Map U.pdf](#)
[Draft Land Use Map U.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)

Hi KDLC Members,

Please see updates from Adam Clark (Planning) and KDLC Membership below.

Growing Together East project – Adam Clark

Good Morning,

Planning staff are pleased to provide you with this update on the Growing Together East project, and are planning to proceed to Planning and Strategic Initiatives Committee for approval this spring. Growing Together East includes the Protected Major Transit Station Areas of Block Line, Fairway and Sportsworld, and will apply Strategic Growth Area land uses and zones to most properties within these PMTSAs. Please see attached for the draft land use and zoning maps that were published in November 2024.

The project launched in June 2024 with a series of community engagements. All property owners and residents in the study area were notified via mailed postcards. Initial draft land use and zoning maps were posted through the project engage page (engagewr.ca/growingtogether) in November, accompanied by another round of postcards mailed to all property owners and residents. This engage update also included information about the planning framework generally as well as the land owner submission process, which is the same process staff used through the Growing Together West project to consider land owner requested changes to land uses and zones. Those November materials were intended to give land owners a head start on preparing submissions for staff to consider requests for different and use designation or zone category in accordance with the submission requirements outlined in November.

The City continues to advance consultant-led studies; a Market Analysis Study and a Transportation

and Noise Study. We also continue to receive agency comments that will inform updated land uses and zoning that will be available for continued conversations with the industry and community in early February. This will represent a complete set of the recommendations that will form our staff report to council in April (pending any additional changes resulting from the industry engagement and submissions process). Possible additional policies and regulations could include:

- Policies and regulations related to non-residential uses on properties
- Policies, holding provisions or special regulations related to noise and transportation impacts
- Policies, holding provisions or special regulations related to other matters such as record of site condition or Kitchener's natural heritage system
- Zoning provisions to establish or reduce maximum building and structure heights in consideration of the Region of Waterloo International Airport agency comments

Throughout February, staff are holding industry office hours to meet with land owners and consultants on site-specific matters. These dates will be provided through engagewr.ca/growingtogether with our early February update. To be as flexible as possible, stakeholders will have the option of:

- sending staff their submission ahead of these meetings for us to review in advance
- presenting their submission to staff at these meetings
- meeting with staff more generally and following up with their submissions, where necessary

All industry submissions must be received no later than March 1st 2025. The submission requirements are provided in detail on our Engage Kitchener page and remain identical to those from the previous phase of the project, Growing Together West. They are:

- Proof of lot ownership
- A conceptual design that demonstrates compliance with the desired zone and refers to the **zone standards approved through Growing Together West**
- A scoped planning justification addressing **Official Plan Policy 15.D.2.5(External link)**, which requires:
 - A demonstration of compatibility with the planned function of the lands and adjacent lands
 - Suitability of the lot for the proposed use or built form
 - Lot consolidation
 - Compliance with Kitchener's Urban Design Manual and Official Plan urban design policies
 - Consideration of cultural heritage resources

These materials will allow staff to evaluate whether or not a submission represents good planning and determine if we will include the change as part of the staff-recommended set of materials. Please note that the submissions process did lead to significant change during the Growing Together West phase of the project:

- A change resulted from 55% of all submissions in direct response to that submission;
- In 22% of submissions, in indirect change was made to address the submission, a change was not necessary to address the submission, a change could not be made legally or was out of the project scope;
- In 23% of submissions, a change was not made due to insufficient justification within the

submission.

As always, we look forward to productive collaboration through this process. Thank you!

Adam Clark (he/him)

Senior Urban Designer (Architecture & Urban Form) | Planning | City of Kitchener | 519-783-8931 | TTY 1-866-969-9994 | adam.clark@kitchener.ca



KDLC membership (continued from last meeting) – Mike Seiling

At the Dec. KDLC meeting, Matt raised 2025 KDLC membership. Since the meeting, we have been discussing the existing membership and identifying member to category (Infill/Downtown, Planning, Engineering or Builder). Note, we understand some members can easily wear 2 category hats. For example, Maria, select engineering or builder hats. 2 of the 4 categories have 4 reps already. It's not an exact science but the goal is to have equal representation, fairness and of course good dialogue at meetings.

Through discussions with Marie Schroeder, Marie will start or has started a process to have 4 reps for each category. Stay tuned.

With more members plus City staff (as witnessed last meeting), a larger venue is required. Shannon has reserved the Conestoga Room (ground floor). Aside from a larger meeting room, virtual meeting capability and added benefit, less aggravating to access the meeting room VS the 2nd floor locked glass double doors. Also, with added members, in 2025 revise and update the Terms of Reference.

Regards,

Shannon Torcato (He/Him)

Program Assistant | Building Division | City of Kitchener



From: [Peter Benninger](#)
To: [Growing Together \(SM\)](#)
Cc: [Cindy Theoret](#)
Subject: RE: Growing Together East - 4166 King Street E., Kitchener
Date: Monday, March 3, 2025 8:59:38 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Good morning Elyssa , thanks again to the Growing Together Team for meeting with Carolyn Benninger and I February 13th regarding the MTSA planning project in the area of 4166 King. It was very helpful to obtain a better understanding of the changes in progress.

I hope your open house last week went well.

At what point in the process will the Zoning map that will be submitted for approval by council be available for us to review ?

Thanks,
Peter

This email is confidential. If you receive it in error, notify the sender by reply email, permanently delete it and make no copies.

From: Growing Together (SM) <GrowingTogether@kitchener.ca>

Sent: February 12, 2025 10:26 AM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Hi Peter, do you have any materials you can share ahead of tomorrow's meeting? This will help the team prepare for the meeting ahead of time.

Thank you,

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca

From: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Thanks,
Peter

This email is confidential. If you receive it in error, notify the sender by reply email, permanently delete it and make no copies.

From: Growing Together (SM) <GrowingTogether@kitchener.ca>

Sent: February 11, 2025 9:51 AM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Thanks Peter, please head to the Service Centre area on the first floor of City Hall and our team will meet you there.

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca

From: [REDACTED]

Sent: Tuesday, February 11, 2025 9:44 AM

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Good morning Elyssa , Thanks for this. 1 pm works perfectly . I will come to City Hall .

Thanks,
Peter

This email is confidential. If you receive it in error, notify the sender by reply email, permanently delete it and make no copies.

From: Growing Together (SM) <GrowingTogether@kitchener.ca>

Sent: February 11, 2025 9:38 AM

To: Peter Benninger [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Hi Peter, thank you for confirming a time. I will send you a calendar invite for 1pm on Thursday. Please let us know if you prefer a virtual or in person meeting at City Hall.

Thank you,

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca

From: [REDACTED]
Sent: Monday, February 10, 2025 5:01 PM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - 4166 King Street E., Kitchener

- Hi Matthew , can you please provide a 30 minute appointment for time slot of : Thursday, Feb 13 between 1 and 4 p.m.

Thanks,
Peter

This email is confidential. If you receive it in error, notify the sender by reply email, permanently delete it and make no copies.

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: February 10, 2025 4:02 PM
To: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Hi Peter,

Thank you for your email. The below link outlines information regarding the landowner consultation process, including the time slots that are available and the submission requirements.

<https://www.engagewr.ca/growingtogether>

Staff are available to meet with landowners to discuss property-specific requests. Interested landowners may book a 30-minute appointment on:

- Tuesday, Feb. 11 between 1 and 4 p.m.
- Thursday, Feb 13 between 1 and 4 p.m.
- Tuesday, Feb. 18 between 1 and 4 p.m.
- Thursday, Feb. 20 between 1 and 4 p.m.

Let us know what might work best for you, and our team will work to schedule a time to meet. We would appreciate if submissions materials can be shared in advance of the meeting so that we have a sense of the request and can better respond during the meeting.

If there are any questions, please reach out.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener

519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: [REDACTED]
Sent: Monday, February 10, 2025 3:33 PM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: [REDACTED]
Subject: Growing Together East - 4166 King Street E., Kitchener

Hi Matthew , I am representing the landowners of 4166 King Street (my nieces) . Please see chain below. I understand time is of the essence for consultation prior to an upcoming public meeting . Would you be available for call/teams meeting to discuss ?

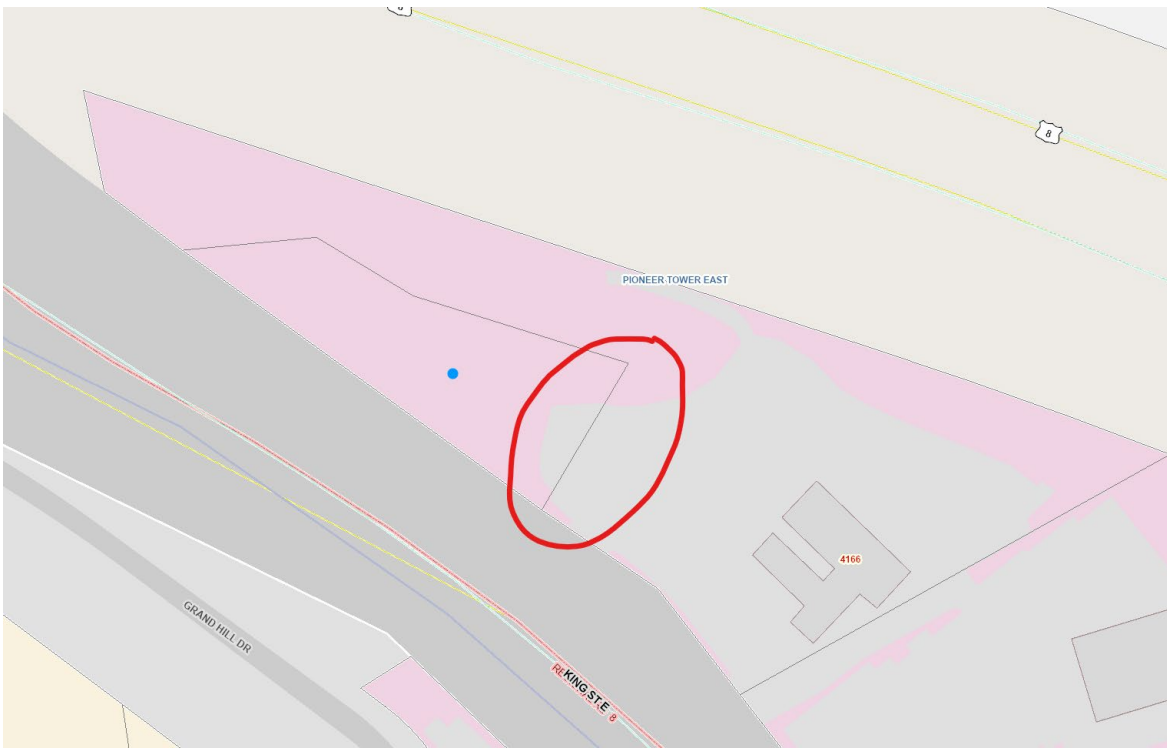
Thanks,
Peter Benninger

This email is confidential. If you receive it in error, notify the sender by reply email, permanently delete it and make no copies.

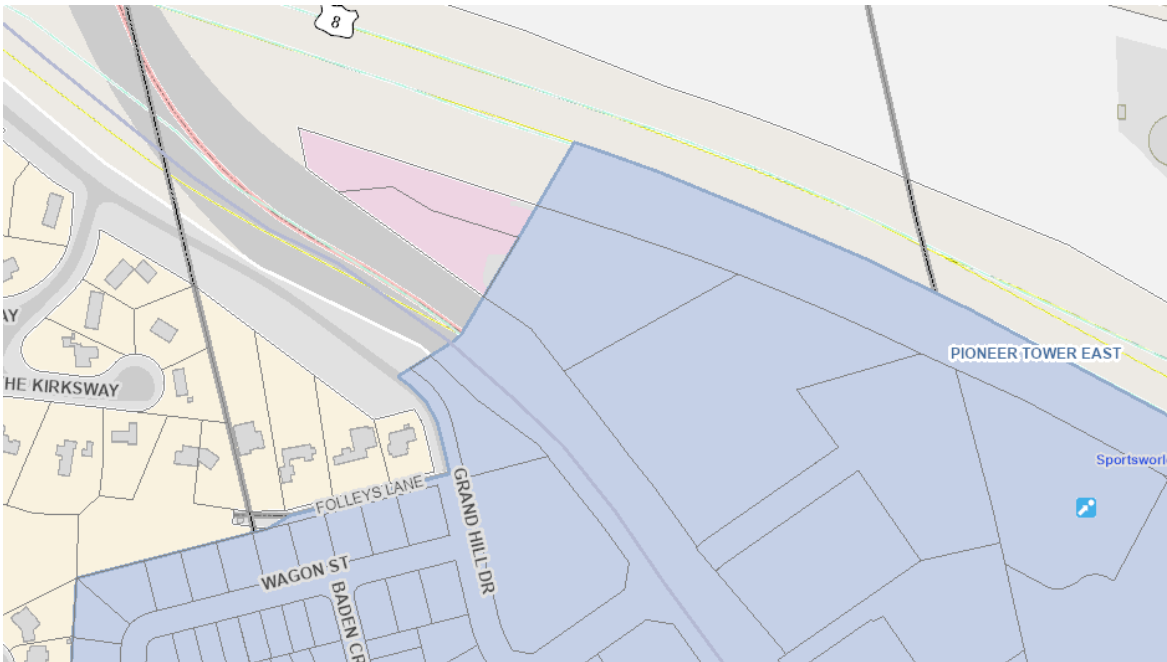
From: Growing Together (SM) <GrowingTogether@kitchener.ca>
Sent: January 27, 2025 4:32 PM
To: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - 4166 King Street E., Kitchener

Good Afternoon Cindy,

The PMTSA boundary follows the circled property line;



Which you can also see on this map with the PMTSA boundary in blue:



On an aerial photograph, that places the PMTSA boundary here:



The wood lot is not within the PMTSA boundary. Hopefully this provides additional clarity but please let us know if you have any further questions,

The Growing Together Team

From: [REDACTED]
Sent: Monday, January 13, 2025 11:45 AM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: RE: Growing Together East - 4166 King Street E., Kitchener

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hello,

Thank-you for your reply regarding the updated map showing a more concise line on the map. The owners of 4116 King Street E use a portion of the wood lot for their commercial business. I have attached an aerial view with a red line showing to where the owners use the property. Could you confirm if this area is in or not.

Thank-you in advance.

Sincerely,
Cindy

Cindy Theoret
Sales Representative

Coldwell Banker Peter Benninger Realty Brokerage *

This email is confidential. If you received it in error, notify the sender by reply email, permanently delete it and make no copies.
*Independently Owned and Operated

From: Growing Together (SM) <GrowingTogether@kitchener.ca>

Sent: January 2, 2025 12:27 PM

To: [REDACTED]
[REDACTED]

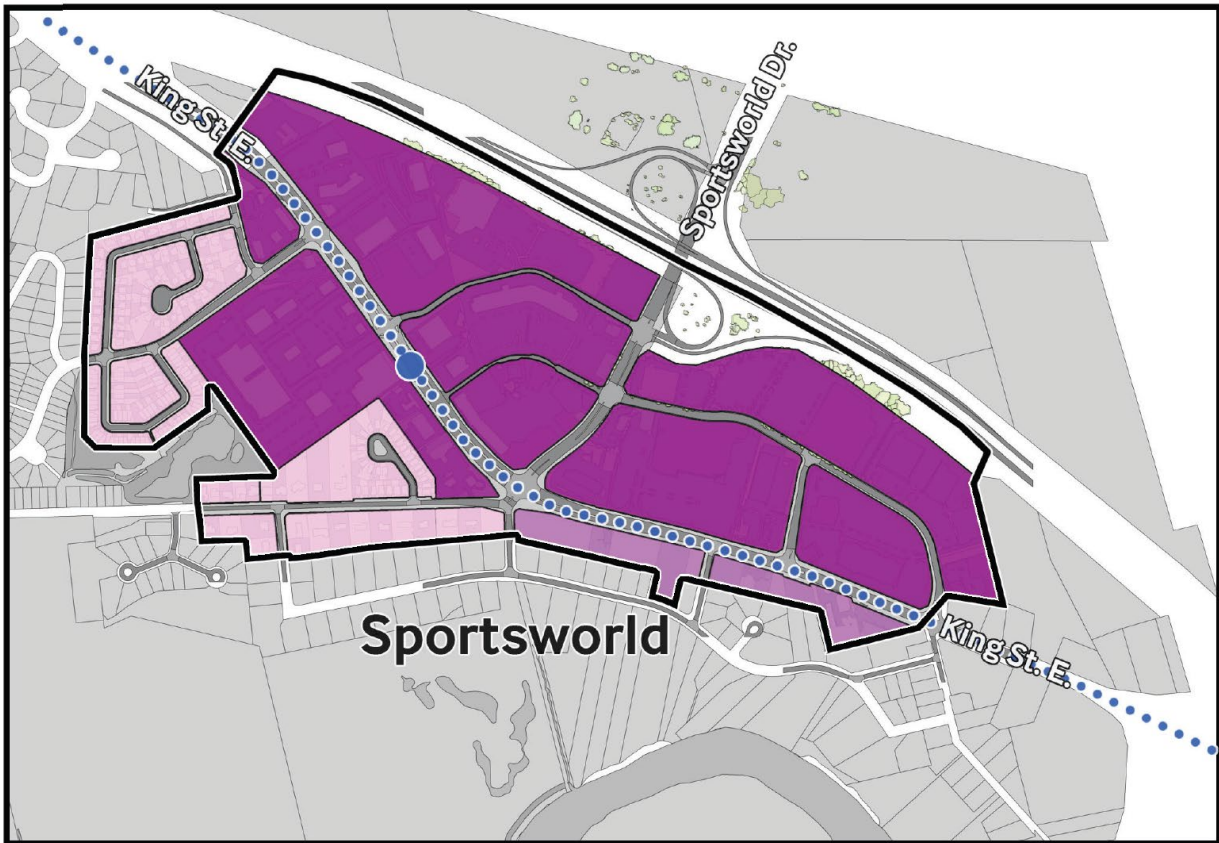
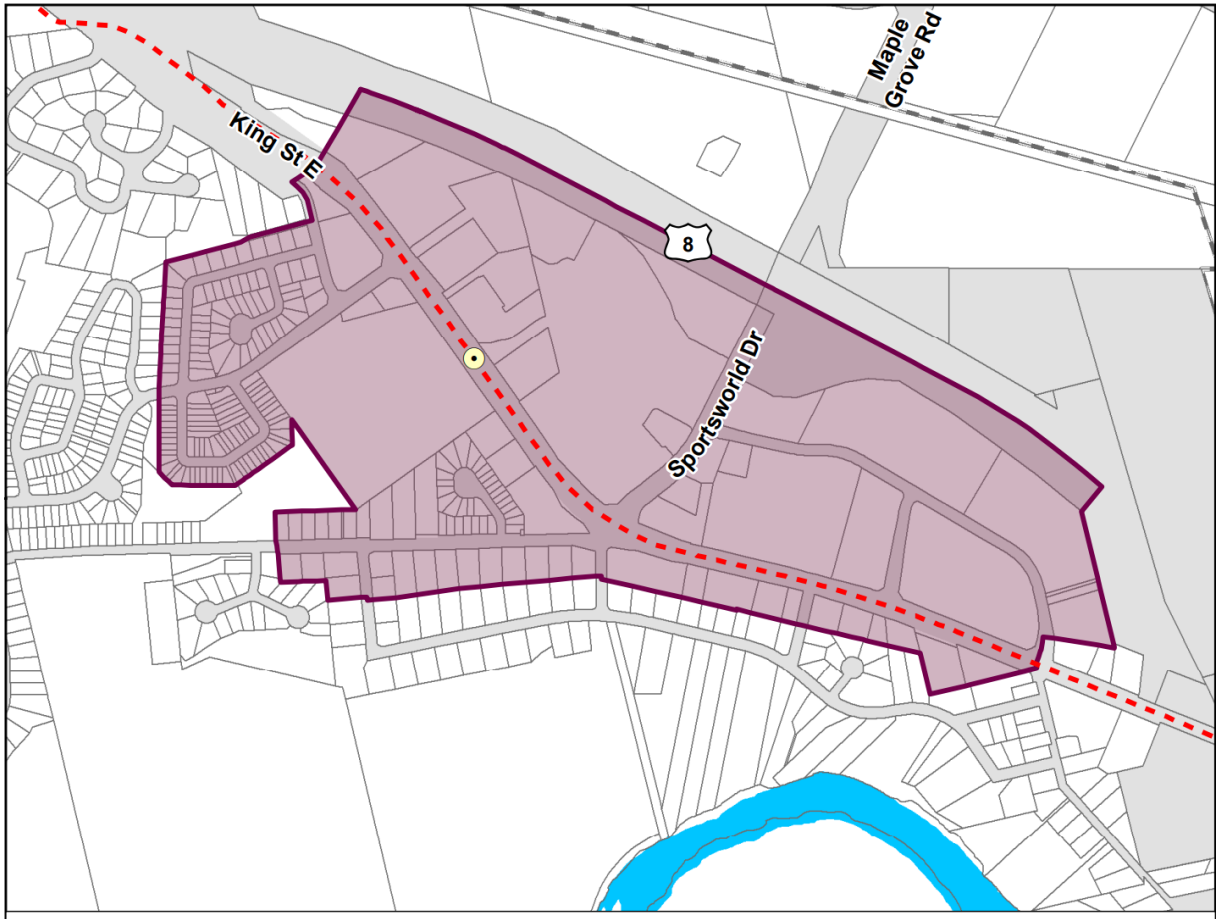
Subject: RE: Growing Together East

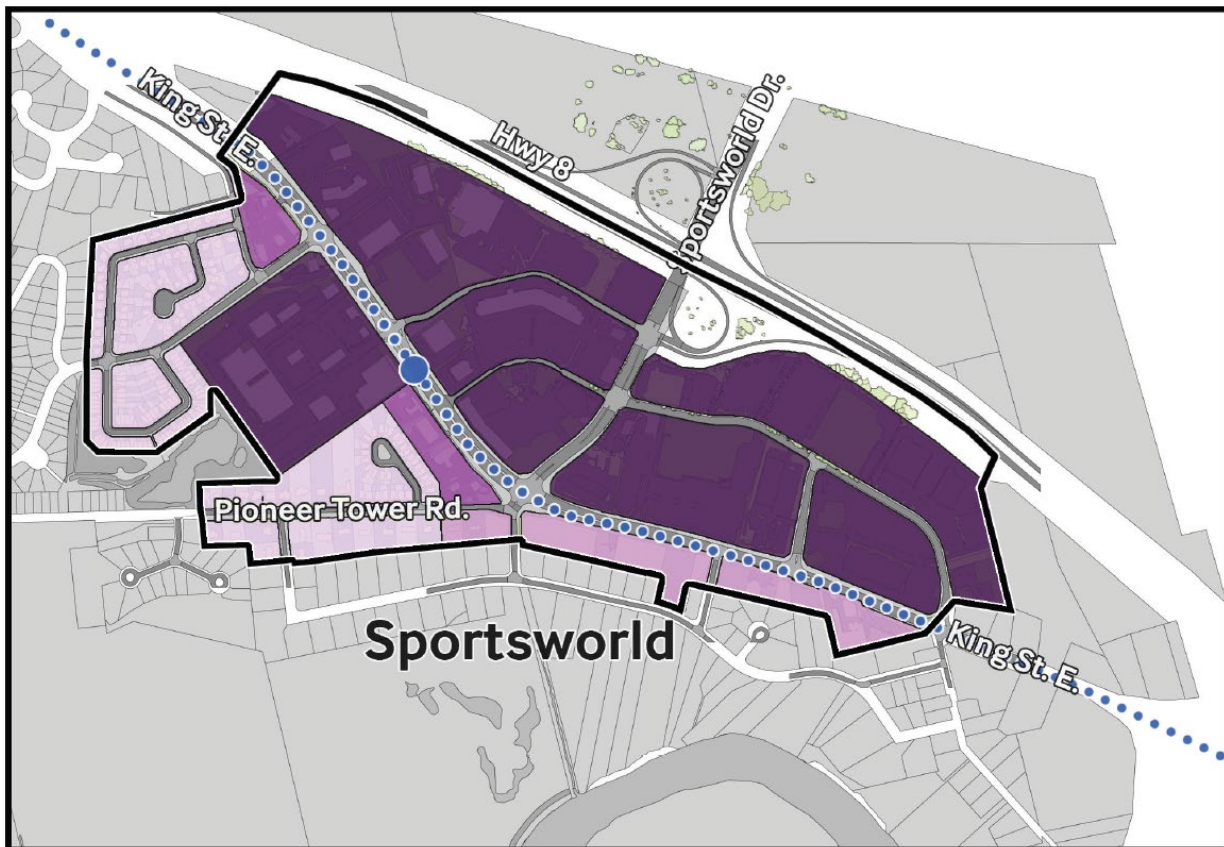
Good Afternoon Cindy,

Apologies for the confusion, there was misalignment of the boundary on the draft mapping, which has now been fixed. 4166 King St. E. is on the edge of the MTSA and is mostly inside the boundary, as you can see in the map below. The portion of the property outside the boundary forms part of a woodlot. The [first map](#) below is from the Region of Waterloo Official plan. The Region determined this boundary. I will also provide screenshots of the [updated draft land use](#) and [zoning mapping](#) that shows where the SGA-C land use and SGA-4 zoning applies.

Please let us know if you have any additional questions. Thank you!

The Growing Together Team





From: [REDACTED]
Sent: Wednesday, December 11, 2024 1:49 PM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together East

You don't often get [REDACTED]. [Learn why this is important](#)

Hi,

I have been looking at the proposed draft land use and zoning maps for the Growing Together East in particular the Sportsworld area and I can't figure out 4166 King Street, E. is in or out of the Zoning area or is it subject to sit-specific application. If it is out of all the proposed zoning growth areas can you explain why.

Thanks,
Cindy

From: [Bridget Coady](#)
To: [Growing Together \(SM\)](#)
Subject: Growing Together East Sportworld MTSA
Date: Friday, November 8, 2024 2:12:08 PM

You don't often get [REDACTED]. [Learn why this is important](#)

Hello Team,

Thank you for your hard work in getting the draft land use and zoning maps to this point.

I am a landowner in the Settler's Grove community, just outside of this MTSA, but as a professional planner practicing in the region am slightly concerned about two of the strategic growth area designations proposed in the Sportsworld MTSA. The area bounded by Wagon St., Grand Hill Drive and Deer Ridge Drive as well as the area along Pioneer Tower Road and Pioneer Grove Court should be removed from consideration as "Strategic Growth Areas". Both of these areas are what would be considered "stable residential neighbourhoods". I believe that gentle intensification and inclusionary zoning should be permitted, as of right, as it is in all residential neighbourhoods across the City. By designating these two areas for "Strategic Growth", it would set expectations and land speculation resulting in incompatible development within these stable residential neighbourhoods. In my opinion the residential land use designations in these two areas should be similar to/the same as all other residential land use designations, for areas outside of MTSAs, in the City of Kitchener. These two areas are no different then Doon South, Kiwannis Park, Pioneer Park, etc. which are not identified as "Strategic Growth Areas"

On a related note I am generally supportive of the higher density designations around the MTSAs but am very concerned that including residential uses in the Sportsworld Area SGA-4 areas is facilitating/permitting a sub standard quality of life for future residents and families, while making an existing public and community amenity access problem, worse for existing residents. Please consider restricting residential development within the SGA-4 areas in the Sportsworld MTSA for the following reasons:

- This area of Kitchener is a food desert - the financial impediments to shopping at Costco means that this is not an accessible option for food shopping for many. I am always hopeful that other smaller food store options will lease space in this neighbourhood but we have been waiting for 15 years with no luck. Unless the City can actually legislate that food stores locate and lease in this area I think you can expect this food desert situation to continue for many years to come.
- Further, this area is blessed with lots of green space, but very little of this green space is programmed and even less is in a form of public ownership that would allow

unrestricted access for residents. From a public park perspective this area is already severely underserved. Public access to green space within a 10 minute walk of the SGA-4 areas would provide ONE pocket park, that is already inadequate for the existing children in the Settler's Grove and Pine Grove Communities. There are even fewer formal walking trails within an accessible walking distance of the SGA-4 areas for dog walkers or parents of babies wanting to enjoy nature. This lack of public access, will ultimately encourage trespassing on quasi-public and private green spaces such as Deer Ridge Golf Course, and River's Edge Golf Course or the Grand Hill Community's private recreational facilities. Unless the City is planning on acquiring public park land on the north side of King Street East, permitting/encouraging 1000's of residents to locate in this area will mean a very poor quality of life for future residents and a decreased quality of life for the residents already living in the Settler's Grove, Pine Grove Grand Hill and Deer Ridge Communities.

- Lastly, there are no public or separate schools within walking distance of the SGA-4 areas or for the existing residents. Primary aged children in this area are bussed to Cambridge or to downtown Kitchener, neither of these options are ideal and does not facilitate the creation of 15minute communities. Welcoming in hundreds of additional families to this area knowing that these substandard conditions exist and will continue to exist for decades (if not forever) is providing a disservice to these same future residents.

.....

- I will refrain from speaking about traffic in this area, as I am sure you have heard this planning concern from many residents already. It is quite obviously horrendous, made worse by recent Regional Road Projects (Phase 2 of King St E reconstruction from Sportsworld Drive to the Freeport Bridge is still to come). I can personally attest to, feeling trapped in my own community, many times throughout the year (and every year since we moved here). When bridge closures to the south and north occur, or if there is extreme traffic or emergency detours on the 401 or Hwy 8, it means there is NO LEAVING or getting back home to this area by personal vehicle or by transit. Introducing thousands more residents will obviously make this situation worse.....exponentially.

Please also consider protecting some or all of the existing arterial corridor/office commercial designations currently in place along this stretch of King Street E. in the SGA-4 areas. While these uses are less desirable from a land use efficiency/density perspective they are reasonably placed in this "gateway" area and the expectation is that these land uses will continue to be needed by the larger community for many years to come. "Upzoning" this area to support transit ridership, will effectively force these less dense uses out farther in to our agricultural land/countryside (encouraging sprawl).

Thank you for the consideration of my experiences as a resident in the Sportsworld area and my opinions as a professional planner. I believe two members of your team are able to contact me via the Kitchener 2051 CWG if you would like to discuss anything further.

Bridget Coady MCIP RPP

on behalf of my husband Scott Rowbotham and children

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Elyssa Pompa](#)
Cc: [Growing Together \(SM\)](#)
Subject: RE: Growing Together East - Inquiry
Date: Tuesday, November 19, 2024 12:26:44 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

You don't often get [REDACTED]. [Learn why this is important](#)

Hello Elyssa,

Thank you for the information below.

Regards,
Janice

From: Elyssa Pompa <Elyssa.Pompa@kitchener.ca>
Sent: November 19, 2024 12:13 PM
To: [REDACTED]
Cc: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together East - Inquiry

Hi Janine,

Thank you for your inquiry.

City staff have been working to develop the Draft Land Use and Zoning Maps for the Block Line, Fairway, and Sportsworld Major Transit Station Areas (MTSAs). The draft approach to growth and change combines public and collaborator feedback. The property at 33 Pioneer Tower Rd falls within the Sportsworld MTSA.

The proposed changes aligns with key City of Kitchener objectives to:

- Address the housing crisis by improving housing choice and affordability in Kitchener's MTSAs;
- Address the climate emergency by creating transit-supportive communities. This includes maximizing the use of existing infrastructure and leveraging new infrastructure;
- Encourage a shift towards active transportation and transit within complete communities that provide for daily needs; and
- Help bring more people, activity, life and diversity to Kitchener's MTSAs.

On November 8, Staff released the following DRAFT mapping:

- Draft Land Use Map: <https://www.engagewr.ca/43763/widgets/183534/documents/142712>
- Draft Zoning Map: <https://www.engagewr.ca/43763/widgets/183534/documents/142713>

These materials are not final. Changes may be made based on continued dialogue with residents, industry and agencies. A complete set of draft materials will be published in February 2025.

There are a few ways you can share your thoughts:

- Beginning February 2025, staff will offer one-on-one meetings to discuss site-specific opportunities
- Provide your written comments that will be included in the Staff Report going to Council next year

For more information, please visit: <https://www.engagewr.ca/growingtogether>

Thank you,

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca



From: [REDACTED]
To: [Growing Together \(SM\)](#)
Subject: RE: Growing Together West
Date: Monday, December 2, 2024 8:51:01 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi Elyssa

Awesome. Thank you!

Eunice Betancourt
Office Manager
[REDACTED]

From: Growing Together (SM) <GrowingTogether@kitchener.ca>
Sent: Friday, November 29, 2024 4:15 PM
To: [REDACTED]
Subject: RE: Growing Together West

Hi Eunice,

You can find the permitted uses for the SGA zones in the attached. Please let us know if you require anything else.

Kind regards,

Elyssa Pompa (she/her), MES Pl., RPP, MCIP
Planner (Policy) | Planning and Housing Policy Division | City of Kitchener
519-783-8943 | TTY 1-866-969-9994 | elyssa.pompa@kitchener.ca

[REDACTED]
Sent: Friday, November 29, 2024 11:05 AM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together West

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi there,

Where can I find the zoning uses for properties zoned SGA1 through 4?
Or can it be found in the "Community Guide to Land Use and Zoning" pdf under the
"November 2023 Materials" tab?

For example, It says "Listed here are a few of the fundamental regulations that apply to the
SGA2 zone". Where can I find the material that lists ALL the regulations?

I hope that makes sense.

I'm just learning about this new zoning law. Thanks for your help!

Eunice Betancourt
Office Manager



From: [REDACTED]
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Elyssa Pompa](#)
Subject: RE: Question - Zoning
Date: Thursday, November 21, 2024 9:26:01 AM

You don't often get [REDACTED] [Learn why this is important](#)

Good Morning Matt,

Thank you for the information below.
Have a good day.

Regards,
Janice

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: November 21, 2024 9:18 AM
To: rjwalman@rogers.com
Cc: Adam Clark <Adam.Clark@kitchener.ca>; Elyssa Pompa <Elyssa.Pompa@kitchener.ca>
Subject: RE: Question - Zoning

Good morning Janice,

Thank you for your inquiry. The zoning on the property located at 33 Pioneer Tower Rd. is currently Residential 2 (R-2) under Zoning By-law 85-1.

The City is currently undertaking Growing Together East initiative to update zoning in the Sportsworld Major Transit Station Area, which includes the below noted address. A map of the Study Area and description of the proposed zones can be found on the project webpage:
<https://www.engagewr.ca/growingtogether>

The maps shown on the project webpage are draft and preliminary for public consideration. The proposed zoning on 33 Pioneer Park Dr. is "Strategic Growth Area 2 (SGA-2)", as shown on the map at the link above.

Further information about the project and ways to stay involved are noted on the webpage. You can subscribe for project updates by typing your email in the top right corner of the webpage, and clicking "Subscribe".

Thank you,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Sent: Tuesday, November 19, 2024 9:38 AM
To: Tara Zhang <Tara.Zhang@kitchener.ca>; Planning (SM) <planning@kitchener.ca>
Subject: Re: Question - Zoning
Importance: High

Good Morning,

Please reply to this email [REDACTED] and not to the one below.
Can you let me know what the current zoning is for the homes near 33 Pioneer Tower Rd. in Kitchener? Is there a zone change in the works and what is being proposed?
When is all of this possibly happening? Can you email me the pdf of the properties that would be allowed to be built if a zone change is approved.

Thanks,
Janice Walman
[REDACTED]

Sent: November 19, 2024 9:32 AM
To: Planning (SM) <planning@kitchener.ca>; tara.zhang@kitchener.ca
Subject: Re: Question - Zoning
Importance: High

Good Morning,

Can you let me know what the current zoning is for the homes near 33 Pioneer Tower Rd. in Kitchener? Is there a zone change in the works and what is being proposed?
When is all of this possibly happening? Can you email me the pdf of the properties that would be allowed to be built if a zone change is approved.

Thanks,
Janice Walman
[REDACTED]

From: [Growing Together \(SM\)](#)
To: [Adam Clark](#)
Subject: FW: Transit
Date: Monday, March 17, 2025 11:24:06 AM

-----Original Message-----

From: [REDACTED]
Sent: Monday, November 25, 2024 5:03 PM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Re: Transit

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Thank you for letting me know and also want to pass on a Thank you for putting in a cross walk the corner of greenfield and kingsway drive I have been living in this area for over 50 years and it is very much appreciated Sent from my iPad

> On Nov 25, 2024, at 2:45 PM, Growing Together (SM) <GrowingTogether@kitchener.ca> wrote:
>
> Hi Maureen,
>
> Thank you for your inquiry.
>
> City staff have been working to develop the Draft Land Use and Zoning Maps for the Block Line, Fairway, and Sportsworld Major Transit Station Areas (MTSAs). The draft approach to growth and change combines public and collaborator feedback. Your address is located within the Fairway MTSA.
>
> The proposed changes aligns with key City of Kitchener objectives to:
> * Address the housing crisis by improving housing choice and affordability in Kitchener's MTSAs;
> * Address the climate emergency by creating transit-supportive communities. This includes maximizing the use of existing infrastructure and leveraging new infrastructure;
> * Encourage a shift towards active transportation and transit within complete communities that provide for daily needs; and
> * Help bring more people, activity, life and diversity to Kitchener's MTSAs.
>
> Through this process, we are not changing any bus routes.
>
> On November 8, Staff released the following DRAFT mapping:
>
> These materials are not final. Changes may be made based on continued dialogue with residents, industry and agencies. A complete set of draft materials will be published in February 2025.
>
> Thank you,
>
> Matt.
>
> Matthew Rodrigues (he/him), MCIP, RPP
> Senior Planner | Planning and Housing Policy Division | City of
> Kitchener NEW 519-783-8946 | TTY 1-866-969-9994 |
> Matthew.Rodrigues@kitchener.ca
>
> -----Original Message-----

> From: [REDACTED]
> Sent: Wednesday, November 13, 2024 3:36 PM
> To: Growing Together (SM) <GrowingTogether@kitchener.ca>
> Subject: Transit

>

> [You don't

[REDACTED]

>

> Concerned citizen would like to know why I received a letter about
> zoning area I live in Gresham place the corner of greenfield and
> Kingsway drive . I have talked to my landlord they do not know
> anything about zoning changes . Are you changing bus routes in this
> area or what is going on . Please give me some answers Sent from my
> iPad

From: [REDACTED]
Cc: [Growing Together \(SM\)](#)
Subject: RE: Growing Together - Follow Up Questions
Date: Tuesday, January 28, 2025 2:48:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Good Afternoon Jennifer,

Thank you for your comments and questions. The neighbourhood specific urban design guidelines were developed with residents through the new urban design manual project. While the urban design manual was approved by council in September 2019, these guidelines were deferred to the “Neighbourhood Planning Review (NPR)” project, which, as you note, was part of the Major Transit Station Areas land use planning project at the time. Those guidelines were approved as part of an NPR update that was presented to council in Spring 2021. The guidelines are therefore in effect.

However, the NPR project overall was put on hold in Spring 2021, as full implementation could not proceed until the adoption of Major Transit Station Area policies into the Region of Waterloo’s Official Plan. This occurred with Regional Official Plan Amendment 6 (ROPA 6) in August of 2022.

In the interim, and throughout 2022 and 2023 the Province of Ontario made major changes to planning legislation in response to the housing crisis. One such change is that municipalities may no longer require elevation review and approval. This effectively means that a municipality no longer has the ability to approve a building’s materials, architectural style, features or details. It is also important to understand that design guidelines, while developed in collaboration with the community, city staff and the development industry, and approved by council, did not have the same legal authority as a zoning bylaw regulation in the first place. This means that city staff cannot broadly force a development to make specific changes to address the guidelines, but we work with applicants to find a best-fit and meet the overall intent of the guidelines.

It should also be noted that these urban design guidelines do not call for the replication of historical styles or features, but to complement and respect those of existing surrounding buildings. This can be done successfully with contemporary building design, which is what the example of 605 York is intended to demonstrate. These are subjective criteria; there will always be disagreement about how well a building achieves the design guidelines. The intent of design guidelines is not to prevent change, but to encourage change in a way that meets the evolving needs of people in our community while providing due consideration for the design principles you’ve mentioned in your email.

However, I should also note that 17 Peter was not approved through the Growing Together SGA zoning. That zoning, while approved on March 18th 2024, is not yet in full force and effect as it has been appealed by a developer to the Ontario Land Tribunal. 17 Peter was approved through a site plan application with a minor variance to reduce the required amount of parking under the R-6 zoning

applied to the property through the 85-1 zoning bylaw. SGA zoning did not apply at the time of 17 Peter's site plan approval.

In direct response to your questions:

1. This site plan application was reviewed by a development planner and urban designer, and it was approved.
2. The urban design manual guidelines cannot be forcibly implemented. There are also provincially mandated development approval timelines that are required to be met, and therefore city staff can't force a Planning Act application to be delayed until specific, non-legislated criteria are met, such as compliance with a particular design guideline.
3. Public notice is not required for site plan applications that meet the in-effect official plan policies and zoning regulations as-of-right. Those policies and regulations are developed through a public process with extensive community engagement and are approved by council. Developments that fully meet these policies and regulations are not required to provide additional public engagement to be approved.

Thank you again for taking the time to bring us your questions and concerns.

Adam Clark (he/him)

Senior Urban Designer (Architecture & Urban Form) | Planning | City of Kitchener | 519-783-8931 | TTY 1-866-969-9994 | adam.clark@kitchener.ca



From: [REDACTED]
Sent: Thursday, January 23, 2025 6:39 PM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together - Follow Up Questions

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi Matt / Growing Together Team,

Thank you for your response. I have some follow up questions.

There is a new infill development at 17 Peter Street (Cedar Hill). Screenshot below.

As part of SGA planning, Urban Design Planning Staff held six “Growing Together” Design Charrettes with residents to collaboratively develop Urban Design Guidelines specific to their neighbourhood. See [Area Specific Guidelines](#).

Under 'Schneider Creek & Cedar Hill - Heritage (04.1.1) it states ...

- New development will respect and complement the existing neighbourhood context, including front porches, pitched roofs, detached rear garages, and use of brick as the dominate building materials

Under the [Urban Design Manual](#) (03.3.0 Site Design) it states ...

- Maintain the neighbourhood's prevailing pattern of lot widths, lot depth and lot area.
- Complement the existing development pattern of the neighbourhood in terms of building location, building height, landscaping, setbacks, entrances, windows and other architectural elements. The use of repetitive or generic design is discouraged.
- Provide a built-form which respects and complements existing neighbourhood characteristics, including heights, setbacks, orientation, building width and length and architectural rhythms.
- Respect the rhythms of design elements from the existing neighbourhood and streetscape. This rhythm can be found through massing, materials, details, and architectural features.
- On a street where existing elements (e.g. architectural styles, porches, building placement, materials etc.) are recurring, new development should reflect some or all of the key elements, sensitively interpreting these elements to reflect contemporary design approaches.

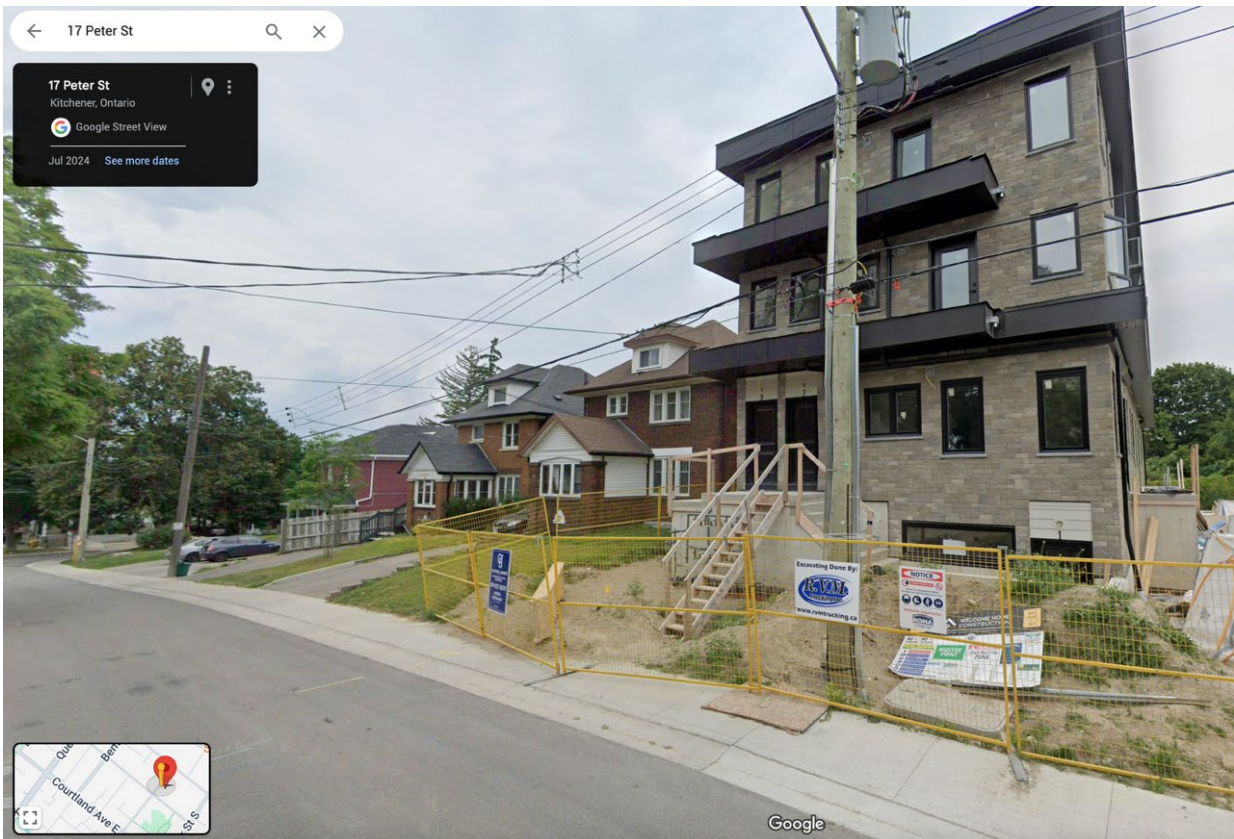
Referring to your response below ...

'Through planning applications for development, applicants must demonstrate how they meet the Urban Design Manual and the policies and regulations applied through Growing Together.'

1. Could you clarify how this applicant (17 Peter Street) demonstrated how they met the Urban Design Manual and the policies and regulations applied through Growing Together? The infill doesn't appear to align with the standards above, especially the Heritage criteria the public was consulted on.

2. When an infill application is submitted with variances, could you explain why the built-form design standards (ie. architectural style, porches, roofs, materials) aren't enforced in the plan **before** the application is sent to the Committee of Adjustment?

3. When an infill application is submitted without variances (no posted yard sign), how are nearby residents informed **before** the application is approved?



Lastly, there is a photo of 605 York Street featured in the [Area Specific Guidelines](#) captioned ...

‘Well designed, contemporary infill can add gentle density to transit-adjacent established neighbourhoods’

I’m confused why this property is featured as an example. It is located in ‘Midtown’. The built-form design conflicts with the Midtown criteria outlined in the same document ...

"Where front porches or detached garages are a predominant feature in the neighbourhood, within a cultural heritage landscape, or along a particular street, **provide the same within new development, additions and/or alterations.**"

It doesn't make sense.

 **Photo_** Well designed, contemporary infill can add gentle density to transit-adjacent established neighbourhoods.



Thank you for your time,

Jennifer

On Oct 24, 2024, at 8:54 AM, Growing Together (SM) <GrowingTogether@kitchener.ca> wrote:

Good morning Jennifer,

Thank you for your email. Growing Together was a policy and zoning framework that was approved by City Council in March. It was the continuation of a project previously called "Neighbourhood Planning Reviews". Through Growing Together, significant public consultation was completed to inform the policies and regulations.

The City's Urban Design Manual is a separate document that this used to help shape development in the community. You can learn more about the Urban Design Manual, here: <https://www.kitchener.ca/en/development-and-construction/urban-design.aspx>

Through planning applications for development, applicants must demonstrate how they meet the Urban Design Manual and the policies and regulations applied through Growing Together.

I hope this helps. Please let me know if you have any other questions.

Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP
Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-741-2200 x 7433 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, October 9, 2024 4:45 PM
To: Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: Growing Together - Developer Application Process

[You don't [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hi Growing Together Team,

I live in the Kitchener Midtown Area (SGA1).

Could you clarify the purpose of the "Growing Together - Neighbourhood Planning Review (Design Charrettes)" and the "Urban Design Manual"?

Within the new SGA1 framework, could you also explain how this criteria is incorporated

and vetted in the developer infill application process?

Thank you for your time,

Jennifer

From: [William Towns](#)
To: [Natalie Goss](#); [Adam Clark](#)
Cc: [Alyssa Bridge](#); [Jordan Vander Veen](#)
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City
Date: Wednesday, March 19, 2025 3:22:13 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[Kitchener Growing Together East MTSA Analysis.pdf](#)
[YKF Conceptual Surfaces Mar17"25.kmz](#)

Hi Natalie and Adam – please see attached for proposed AZR mapping and spatial files (.kmz – let us know if you’d like a different format) associated with the draft AZR for each of the Growing Together East MTSA’s. In keeping with the Region’s requested approach on Growing Together West and until the draft AZR comes into force and becomes federally regulated, the Region requires that the following maximum height values for each MTSA to be reflected in the Growing Together East OPA and ZBA to ensure compatibility with airport operations. Note that these values are inclusive of buildings and temporary obstructions (e.g. construction cranes).

- Block Line: 120m
- Fairway: 92.4m
- Sportsworld: 110m

You’ll see this reiterated in the Region’s forthcoming letter, but we wanted to get this info into the City’s hands ASAP. If you’d like to meet again to discuss we’ll arrange for airport staff to attend – the ongoing strike is affecting staff’s availability, however, so tomorrow would be ideal from their perspective. Otherwise we’re looking at next week, which we recognize is beyond your deadline.

Best,

Will Towns, MCIP, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo



From: Jordan Vander Veen
Sent: March 12, 2025 6:25 PM
To: 'Natalie Goss' <Natalie.Goss@kitchener.ca>
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Hi Natalie, thanks for the information. I’m expecting to receive the digital files March 18, so this will give me a few days to provide results. Shouldn’t be a problem.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

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From: Natalie Goss <Natalie.Goss@kitchener.ca>

Sent: March 12, 2025 11:55 AM

To: Jordan Vander Veen [REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

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Hi Jordan,

We continue to be on track to take a recommendation report to Council for Growing Together East in mid-April. To remove references to the IDS study and reflect any updated information that may come from the draft AZR we need final comments no later than end of day March 21st.

Thanks.

Natalie

From: Jordan Vander Veen [REDACTED]

Sent: Tuesday, March 11, 2025 6:43 PM

To: Natalie Goss <Natalie.Goss@kitchener.ca>

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Hi Natalie,

I've just reached back out to our consultants for an update. They wanted to do a final QA against some Nav Canada data before sharing the digital files. I'm hoping to receive them soon, do my own internal review quickly, then send them to Kitchener if all looks good.

When do you need final comments from us?

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

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From: Natalie Goss <Natalie.Goss@kitchener.ca>

Sent: March 10, 2025 4:55 PM

To: Jordan Vander Veen [REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

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Hi Jordan,

Further to our emails exchange a few weeks ago, I'm hoping that you can provide me with an update on the timing of the draft AZR and an indication of when we may expect updated comments from you with respect to airport height matters as they related to Growing Together East.

Thank you for your continued conversations on this.

Natalie

From: Jordan Vander Veen [REDACTED]

Sent: Tuesday, February 18, 2025 9:43 AM

To: Natalie Goss <Natalie.Goss@kitchener.ca>

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Good morning Natalie,

Thanks for the ongoing dialogue, I appreciate the conversations.

I can confirm that we intend to use the draft AZR for reviewing development applications as soon as it is available. This does supersede the IDS studies for the PMTSAs.

I suggest we have a call early March to discuss the draft AZR and associated impacts on Growing Together East once we have both had a chance to review it.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

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From: Natalie Goss <Natalie.Goss@kitchener.ca>

Sent: February 18, 2025 8:55 AM

To: Jordan Vander Veen

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Importance: High

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Good morning Jordan,

Thank you for meeting with us at the end of January. We appreciate the updates that were shared about the timing of a draft AZR. As we understand, even though a new AZR won't be in effect for a few years, once the draft AZR is released in late February/early March it is intended to be used by airport staff in determining maximum heights where it applies rather than the maximum heights determined for Kitchener's PMTSAs from the IDS studies. Please confirm that I have understood correctly. If you could possibly confirm this by the end of the day today I would appreciate it.

Following our January call, you will have received circulation of the draft land use and zoning for Growing Together East. Should you have any questions about that material please let us know. We continue to consider comments received in preparation for a recommendation report to Council in April.

Natalie

Natalie Goss, MCIP, RPP (she/her)

Manager, Policy & Research | Planning & Housing Policy Division | City of Kitchener

NEW – 519-783-8933 | TTY 1-866-969-9994 | natalie.goss@kitchener.ca



From: Jordan Vander Veen [REDACTED]
Sent: Thursday, January 23, 2025 12:14 PM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: Amanda Kutler [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - Region & City

Hi Matthew,

Thanks for providing the agenda, and looking forward to our discussion next week.

I reviewed the agenda and would like to advise that we cannot answer all of your airport-related questions until the proposed AZR is developed. My consulting team is still working on the proposed AZR which I expect to receive late February, and so I can share it once we review internally and are satisfied with it. I'll attend next week, but I suggest we set up another call early March to review the proposed AZR as it relates to Growing Together East, and answer any questions you have at that time.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport
[REDACTED] [REDACTED]

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-----Original Appointment-----

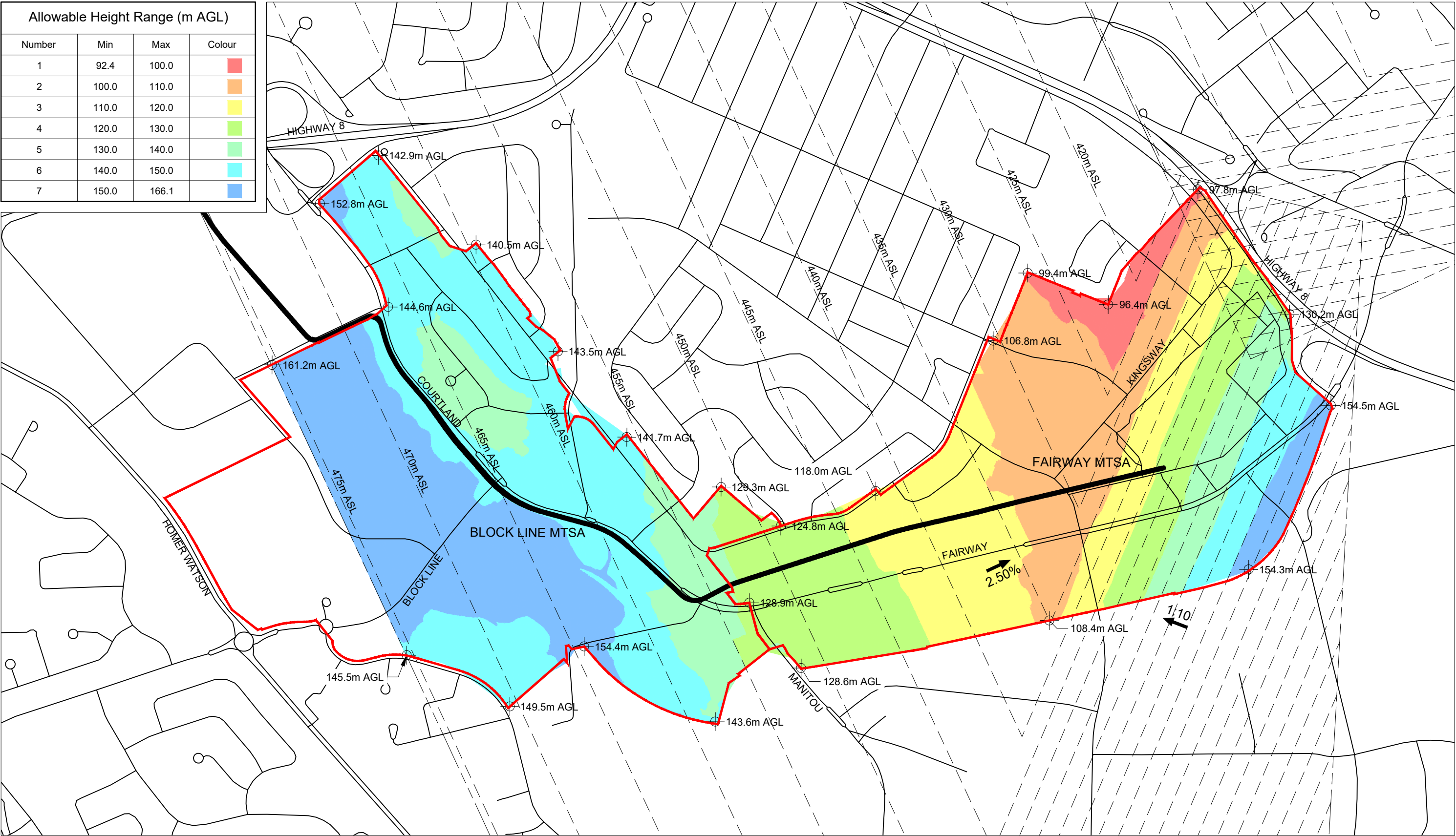
From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Sent: January 16, 2025 1:44 PM
To: Matthew Rodrigues; Alyssa Bridge; William Towns; Natalie Goss; Adam Clark; Elyssa Pompa; Rosa Bustamante; Doug Spooner; Blair Allen; Bridget Coady; Matthew O'Neil; Jordan Vander Veen; Chris Wood
Subject: Growing Together East - Region & City
When: January 30, 2025 2:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

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DATE: 2025-03-19
H:\AIRPORT\TECHNICAL DRAWINGS\DEVELOPMENT\EXTERNAL\KITCHENER MTS\AIR KITCHENER GROWING TOGETHER EAST MTSA ANALYSIS.DWG

Allowable Height Range (m AGL)			
Number	Min	Max	Colour
1	92.4	100.0	
2	100.0	110.0	
3	110.0	120.0	
4	120.0	130.0	
5	130.0	140.0	
6	140.0	150.0	
7	150.0	166.1	






Region of Waterloo
INTERNATIONAL
AIRPORT



Scale 1:10000



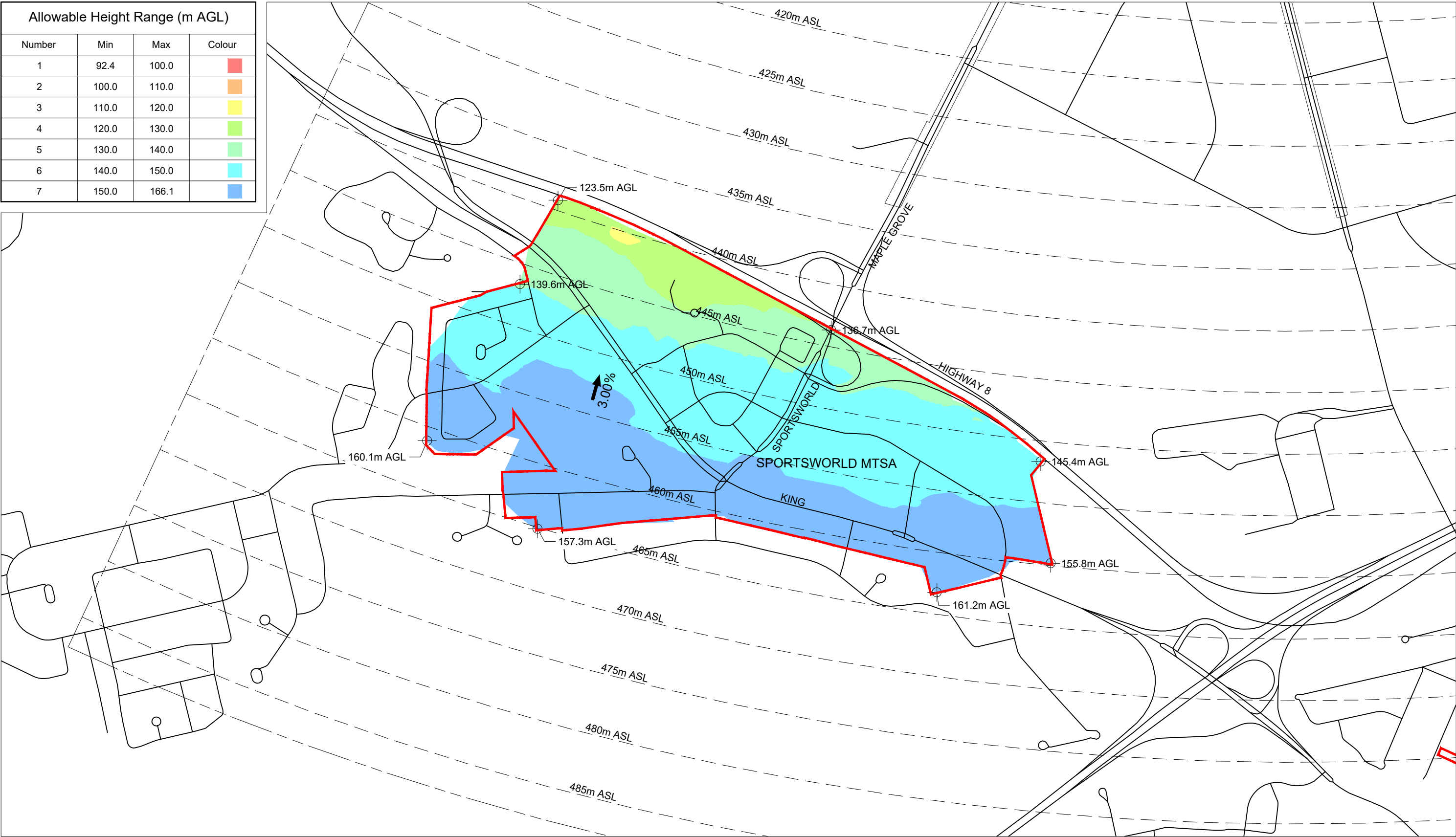
Region of Waterloo

SCALE	1:10,000
DATE:	March 19, 2025
DRAWN BY:	JV
DWG No.	SK1


YKF Proposed AZR
City of Kitchener
Growing Together East
Fairway and Blockline MTSA

DATE: 2025-03-19
H:\AIRPORT\TECHNICAL DRAWINGS\DEVELOPMENT\EXTERNAL\KITCHENER MTS\KITCHENER GROWING TOGETHER EAST MTSA ANALYSIS.DWG

Allowable Height Range (m AGL)			
Number	Min	Max	Colour
1	92.4	100.0	
2	100.0	110.0	
3	110.0	120.0	
4	120.0	130.0	
5	130.0	140.0	
6	140.0	150.0	
7	150.0	166.1	







SCALE	1:10,000
DATE:	March 19, 2025
DRAWN BY:	JV
DWG No.	SK2

YKF Proposed AZR
City of Kitchener
Growing Together East
Sportsworld MTSA

From: [William Towns](#)
To: [Natalie Goss](#); [Adam Clark](#)
Cc: [Alyssa Bridge](#); [Jordan Vander Veen](#); [Bridget Coady](#); [Cheryl Marcy](#)
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City
Date: Thursday, March 20, 2025 4:10:53 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[DOCS ADMIN-#4909988-v2-Regional comments on recommendation reports - City of Kitchener Growing Together East OPA ZBA - Feb 2025 .pdf](#)
[Kitchener Growing Together East MTSA Analysis.PDF](#)
[Regional comment matrix - Recommendation reports, Growing Together East \(March 2025\).pdf](#)

Hi Natalie and Adam – following up on the below: please see attached for Regional comments on the land use/zoning brief and recommendation reports. Let us know if and when you'd like to discuss – note that I'm out of the office tomorrow, so please reach out to Alyssa as needed.

Best,

Will Towns, MCIP, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo



From: William Towns
Sent: March 19, 2025 3:21 PM
To: Natalie Goss <Natalie.Goss@kitchener.ca>; Adam.Clark@kitchener.ca



Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Hi Natalie and Adam – please see attached for proposed AZR mapping and spatial files (.kmz – let us know if you'd like a different format) associated with the draft AZR for each of the Growing Together East MTSAs. In keeping with the Region's requested approach on Growing Together West and until the draft AZR comes into force and becomes federally regulated, the Region requires that the following maximum height values for each MTSA to be reflected in the Growing Together East OPA and ZBA to ensure compatibility with airport operations. Note that these values are inclusive of buildings and temporary obstructions (e.g. construction cranes).

- Block Line: 120m
- Fairway: 92.4m
- Sportsworld: 110m

You'll see this reiterated in the Region's forthcoming letter, but we wanted to get this info into the

City's hands ASAP. If you'd like to meet again to discuss we'll arrange for airport staff to attend – the ongoing strike is affecting staff's availability, however, so tomorrow would be ideal from their perspective. Otherwise we're looking at next week, which we recognize is beyond your deadline.

Best,

Will Towns, MCIP, RPP
Senior Planner
Planning, Development and Legislative Services
Region of Waterloo

From: Jordan Vander Veen
Sent: March 12, 2025 6:25 PM
To: 'Natalie Goss' <Natalie.Goss@kitchener.ca>
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Hi Natalie, thanks for the information. I'm expecting to receive the digital files March 18, so this will give me a few days to provide results. Shouldn't be a problem.
Thanks.

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From: Natalie Goss <Natalie.Goss@kitchener.ca>
Sent: March 12, 2025 11:55 AM
To: [REDACTED]
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

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Hi Jordan,

We continue to be on track to take a recommendation report to Council for Growing Together East in mid-April. To remove references to the IDS study and reflect any updated information that may come from the draft AZR we need final comments no later than end of day March

21st.

Thanks.

Natalie

From: [REDACTED]

[REDACTED] March 11, 2025 6:43 PM

To: Natalie Goss <Natalie.Goss@kitchener.ca>

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Hi Natalie,

I've just reached back out to our consultants for an update. They wanted to do a final QA against some Nav Canada data before sharing the digital files. I'm hoping to receive them soon, do my own internal review quickly, then send them to Kitchener if all looks good.

When do you need final comments from us?

Thanks.

[REDACTED]

[REDACTED]

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From: Natalie Goss <Natalie.Goss@kitchener.ca>

Sent: March 10, 2025 4:55 PM

[REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>

Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

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Hi Jordan,

Further to our emails exchange a few weeks ago, I'm hoping that you can provide me with an update on the timing of the draft AZR and an indication of when we may expect updated

comments from you with respect to airport height matters as they related to Growing Together East.

Thank you for your continued conversations on this.

Natalie

From: Jordan Vander Veen [REDACTED]
[REDACTED] February 18, 2025 9:43 AM
To: Natalie Goss <Natalie.Goss@kitchener.ca>
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RE: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City

Good morning Natalie,

Thanks for the ongoing dialogue, I appreciate the conversations.

I can confirm that we intend to use the draft AZR for reviewing development applications as soon as it is available. This does supersede the IDS studies for the PMTSAs.

I suggest we have a call early March to discuss the draft AZR and associated impacts on Growing Together East once we have both had a chance to review it.

Thanks.

[REDACTED]

[REDACTED]

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From: Natalie Goss <Natalie.Goss@kitchener.ca>
Sent: February 18, 2025 8:55 AM
To: [REDACTED]
Cc: Adam Clark <Adam.Clark@kitchener.ca>
Subject: RESPONSE REQUIRED EOD FEB 18 - RE: Growing Together East - Region & City
Importance: High

You don't often get email from natalie.goss@kitchener.ca. [Learn why this is important](#)

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Good morning Jordan,

Thank you for meeting with us at the end of January. We appreciate the updates that were shared about the timing of a draft AZR. As we understand, even though a new AZR won't be in effect for a few years, once the draft AZR is released in late February/early March it is intended to be used by airport staff in determining maximum heights where it applies rather than the maximum heights determined for Kitchener's PMTSAs from the IDS studies. Please confirm that I have understood correctly. If you could possibly confirm this by the end of the day today I would appreciate it.

Following our January call, you will have received circulation of the draft land use and zoning for Growing Together East. Should you have any questions about that material please let us know. We continue to consider comments received in preparation for a recommendation report to Council in April.

Natalie

Natalie Goss, MCIP, RPP (she/her)

Manager, Policy & Research | Planning & Housing Policy Division | City of Kitchener

NEW – 519-783-8933 | TTY 1-866-969-9994 | natalie.goss@kitchener.ca



From: [REDACTED]
Sent: Thursday, January 23, 2025 12:14 PM
To: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>
Cc: [REDACTED]
[REDACTED]
Subject: RE: Growing Together East - Region & City

Hi Matthew,

Thanks for providing the agenda, and looking forward to our discussion next week.

I reviewed the agenda and would like to advise that we cannot answer all of your airport-related questions until the proposed AZR is developed. My consulting team is still working on the proposed AZR which I expect to receive late February, and so I can share it once we review internally and are satisfied with it. I'll attend next week, but I suggest we set up another call early March to review the proposed AZR as it relates to Growing Together East, and answer any questions you have at that time.

Thanks.

Jordan Vander Veen, P.Eng. | Manager, Airport Construction and Development | Region of Waterloo International Airport

1-4881 Fountain St. N, Breslau, ON NOB 1MO | 📞 519.575.4780 ext. 8514

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-----Original Appointment-----

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: January 16, 2025 1:44 PM

To: Matthew Rodrigues; Alyssa Bridge; William Towns; Natalie Goss; Adam Clark; Elyssa Pompa; Rosa Bustamante; Doug Spooner; Blair Allen; Bridget Coady; Matthew O'Neil; Jordan Vander Veen; Chris Wood

Subject: Growing Together East - Region & City

When: January 30, 2025 2:00 PM-3:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

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Updated meeting invitees and agenda attached

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Natalie Goss, MCIP, RPP
Manager, Policy and Research
Planning Division
City of Kitchener
200 King Street West
Kitchener, Ontario
N2G 4V6

Dear Ms. Goss,

**Re: Proposed City-Initiated Official Plan Amendment and Zoning
By-law Amendments
Review of Technical Recommendation Reports and Briefs
Growing Together East
Fairway, Block Line and Sportsworld Major Transit Station
Areas
City of Kitchener**

Regional staff wish to thank the City of Kitchener for the continued opportunity to participate in project information meetings, review draft materials, and provide comments related to the proposed City-initiated Growing Together East project, which proposes an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for three Major Transit Station Areas (MTSAs) in the City of Kitchener. Regional staff understand that this exercise will extend the land use planning framework (including land use designations and zones) established through the predecessor Growing Together West process to the Block Line, Fairway, and Sportsworld MTSAs as identified on Figures 7c-d and 8a of the Regional Official Plan (ROP).

As described in previous comments dated December 24, 2024 and January 17, 2025, the Region is supportive of this exercise. Planning for these MTSAs is critical to ensuring the smooth integration of Stage 1 and Stage 2 ION from the existing light rail terminus at Fairway Station into southeast Kitchener and Cambridge, ensuring that the communities around stations have the conditions in place to foster strong ridership and transit-oriented lifestyles. These comments are provided to the City and the consultants for their consideration in finalizing technical studies and recommendations underpinning the proposed OPA and ZBA, with particular emphasis on transit, Regional roads, and airport operations.

This letter provides comments related to the documents provided to Regional staff by the City, including:

- Growing Together East – Phase 2: Transportation Analysis Study Report (draft, prepared by LEA Consulting Ltd., dated February 2025)
- Growing Together East – Phase 2: Noise Analysis Study Report (draft, prepared by LEA Consulting Ltd.
- Land Use and Zoning Brief
- Draft priority streets mapping

Summary comments on each document are provided in the following sections, while detailed comments provided by various Regional groups have been appended to this letter with page and section references.

General comments

Overall, Regional staff do not have major concerns with the recommendations of these studies. However, staff do have a number of comments and requests pertaining to Official Plan policies and the zoning by-law amendment, as well as a number of technical questions and suggested refinements to the transportation network recommendations provided in the draft Transportation Analysis Report.

In relation to transit, please note that the Region is currently undertaking a Business Case evaluating the planned extension of ION Rapid Transit from Fairway Station to the Sportsworld MTSA and further south to Cambridge. It is expected this route will primarily follow the Regional Council-approved Stage 2 ION alignment (the Regional Intensification Corridor as designated on Map 1 of the Regional Official Plan) and operate in a mostly dedicated right-of-way. Following Business Case completion and acceptance by Regional Council, detailed design of Stage 2 will begin. Detailed design will stipulate land requirements at Fairway Station, and ultimately the land needs and final location of a new Sportsworld Station (replacing the existing station, which is located on land leased from the Ontario Ministry of Transportation and earmarked for Provincial highway improvements).

Land Use and Zoning Brief

Regional staff have reviewed the Land Use and Zoning Brief prepared by City staff, dated February 7, 2025. In relation to the draft Official Plan policies, the most significant comments and requests are highlighted below by subject area. Additional detailed comments are provided in the appended tracking document.

Transportation, Noise and Servicing

In relation to proposed Official Plan policies, Regional staff recommend adding to proposed policy #2 with language similar to (or explicitly linking) to ROP policy 5.A.3, which recognizes that development proponents may be responsible for the provision of transit infrastructure and easements to support the development and operation of the Regional transit system.

Regional staff concur with proposed policy #4, which identifies the importance of new midblock connections and are supportive of the recommended local roads and minor collector in the Fairway MTSA, in that they create additional active transportation crossing points and improve access to existing transit stops. Staff also note that

potential pedestrian crossings of the Stage 1 ION alignment could be identified by the consultant to improve connections between the Vanier neighbourhood and Fairway Road South.

In recognition of the importance of lands in proximity to Stage 2 ION and as an additional layer of protection through the development process, Grand River Transit (GRT) staff request the inclusion of a holding provision in the proposed Growing Together East zoning by-law amendment to be applied to all properties located within 40 metres of the of the operational Stage 1 ION (LRT) alignment and within 40 metres of the Regional Council-approved Stage 2 alignment (within MTSA limits). The intent is to ensure future development is integrated with and does not negatively impact existing transit operations and future planned expansion to Rapid Transit services and infrastructure in these MTSAs. The holding provision would be lifted upon the submission of a Transit Assessment completed by a Qualified Person to the Region's satisfaction, which would identify any impacts of a proposed development on existing or planned transit services (e.g. operational delays, infrastructure/signal adjustments, etc.), and if impacts are anticipated, that appropriate mitigation measures are recommended for implementation at the proponent's expense. For instance – should a development application on lands subject to the holding provision propose a crossing of the ION LRT or S2ION alignment (e.g. a private driveway access), the Transit Assessment would recommend the completion of further studies as appropriate (e.g. Railway Safety Analysis).

In relation to the noise study and ZBA as identified in the brief, Regional staff have no concerns with the intent of the three types of holding provisions identified (A, B and C) identified in the brief – comments on mapping in the technical report are provided below. Staff note that the mapping presented in supporting figures does not differentiate among these types.

Similar to the above, the City is asked to share mapping associated with the proposed holding provision for sanitary servicing in the Sportsworld MTSA once prepared for comment and confirmation by Regional Water Services staff.

Maximum Building Height & Region of Waterloo International Airport

In accordance with Regional Official Plan Policy 5.A.20, Regional staff review policy projects and development applications to ensure that proposals do not negatively affect the usability, accessibility, or safe operations of the Waterloo International Airport either on a temporary or permanent basis. The airport is a valuable resource in the Region, critical to maintaining existing economic competitiveness and enabling future economic development, and as such, the Region is committed to ensuring that the operation of and economic role the airport plays within the Region is protected for the long term. One means of doing so is by identifying land uses which may cause potential aviation safety hazards in accordance with relevant provisions of the Regional Official Plan, as well as Section 3.4.2 c) of the Provincial Planning Statement, 2024. Note that this provision of the PPS 2024 has been updated compared to Section 1.6.9 of PPS 2020 to prohibit rather than discourage land uses which may cause a potential aviation safety hazard.

In previous comments dated December 24, 2024 and in a meeting with City staff on January 30, 2025, Regional staff provided an overview of ongoing updates to the federally-regulated Airport Zoning Regulations (AZR) which will apply throughout the Region and to the entirety of the Growing Together East geography. While the ultimate timeline for approval of the planned AZR is unknown and relies on federal regulators, draft mapping has now been finalized, and public consultation is planned for the near future. Once the updated AZR is finalized and implemented, all development will be required to adhere to the AZR elevation.

In keeping with the Region's requested approach on Growing Together West and until the proposed AZR comes into force and becomes federally regulated, the Region requires that the following maximum height values for each MTSA be implemented in the Growing Together East OPA and ZBA to ensure compatibility with future development within the Growing Together East geography and airport operations.

MTSA	Proposed heights, SGA-3	Proposed heights, SGA-4	Maximum elevation (metres above ground level) – Proposed AZR
Block Line	25 storeys	Unlimited	120 m
Fairway	25 storeys	Unlimited	92.4 m
Sportsworld	25 storeys	Unlimited	110 m

Note that these values are inclusive of buildings and temporary obstructions (e.g. construction cranes). The attached mapping provides a more detailed overview of the proposed AZR maximum height values applicable in the Growing Together East MTSA's.

Priority Street Mapping

Regional staff have reviewed the priority streets proposed to be identified in Appendix G of the City of Kitchener's zoning by-law 2019-051 and have no concerns with the streets or application of existing regulations to future development on these streets. Recommendations for additional policies to protect for transit-only space on priority streets are made in the following section.

Transportation Analysis Study Report

Regional staff have reviewed the Phase 2 Transportation report, which reviews results of modelling of the transportation network undertaken by the consultant, evaluates future conditions from a multi-modal perspective, and assesses the compatibility of the City's proposed land use and zoning plans with future transportation conditions. A number of network recommendations are then made, many of which pertain to Regional roads.

Grand River Transit (GRT) staff have also identified a range of suggestions to ensure development enabled by the OPA and ZBA align with existing and planned bus and rapid transit services in the MTSAs.

- GRT staff are supportive of the study's identification of key intersections at which transit priority measures (TPM) would be appropriate, and have identified many of these for TPM implementation already. However, there is limited discussion and recognition in the study that these measures may require additional and/or the reallocation of space in the right-of-way, depending on the intersection or TPM in question. Additional detail about the type of TMP proposed, space requirements, and impacts to roadway level of service following TMP implementation should be provided through revisions or an addendum to the study, and locations recommended for TPM in Section 6.2 should be added to the recommended network figures (7-1, 7-2 and 7-3). Alternately or in addition, policies pertaining to the Draft Priority Streets should protect for transit-only curb lanes (for dedicated bus travel, turning movements and queue-jumping) along all segments identified on the Draft Priority Street Map. Critical intersections in this regard include Block Line Road at Courtland Avenue East, Fairway Road South at Wilson Avenue, and King Street East at Sportsworld Drive. See the comment tracker for additional commentary related to TPM in the report.

In relation to proposed roadways, GRT has the following comments and recommendations:

- GRT staff are not supportive of Local Road A in Block Line MTSA, given the significant grade change between Hayward Ave and Courtland Ave E and the subsequent engineering required to design a road in this location that meets required standards and grades (including those that support transit). This proposed road would only have development potential on the eastern side, as the west is encumbered by the rail line. It also introduces the requirement for two additional vehicle crossings of the LRT alignment at Hayward and Courtland, which is undesirable from an LRT operations perspective. Further, GRT has begun planning for a bus terminal at Block Line Station, and the operation of this facility should take priority over this segment of Local Road A. Note also that the development of a bus terminal may have impacts on the exact location/geometry of Future Local Road A. Consider a more conceptual framing for this connection if carried forward.
- Consider if Block Line MTSA could benefit from another Minor Collector: Siebert Avenue could be extended south of Courtland Avenue East and curve to the northeast and connect with Minor Collector A at Manitou Dr in Fairway MTSA. Concerns related to Local Road A in Block Line would apply here as well (e.g. adjacent to the rail line, rendering only the northeastern side developable), but a collector of this nature would extend route options for buses and private vehicles on roads other than Fairway Road South for a longer portion of the Fairway/Courtland corridor.
- Consider an additional "Minor Collector E" to Figure 7-2 between Kingsway Dr and Fairway Road at the only existing signalized intersection to Fairview Mall at Fairway Road South.

- Please reconsider recommending proposed Laneway A in Sportsworld MTSA. All lands northeast of Laneway A are subject to MTO restrictions, permitting process, and plans. Constructing a road that marginally increases connectivity yet must be maintained in perpetuity may not be an efficient investment, increasing maintenance and environmental costs (e.g. salt application) with limited public benefit.

A range of additional detailed comments pertaining to assumptions, mapping, and terminology are made in the comment tracker. Please contact the undersigned to arrange follow-up with GRT staff if and as necessary.

Noise Analysis Study Report

Policies 2.1.2.1 and 2.1.2.2 of the Regional Official Plan require that development applications proposing sensitive uses (including residential) account for impacts associated with noise from stationary sources and Regional and provincial transportation corridors and services respectively. Implementation of this policy is typically achieved through the completion of noise studies required as a component of OPA/ZBA applications.

Regional staff have reviewed the Noise Analysis Study Report and find its recommendations and the location of draft holding provisions acceptable as per Figures 17 and 18 of the report. Additional comments are provided below:

- Regional staff note that holding provision types A, B and C are identified in the land use and zoning brief, but a distinction among these types does not appear in the draft study or supporting figures. Some clarity and updates to the mapping in the report would be helpful in this regard.
- Figures 19-21 indicate properties at which noise impact studies are recommended given that exceedances could occur. Staff note that in the case of 808-836 Courtland Avenue East (identified on Figure 19), a noise study was recently completed as part of a OPA/ZBA application (currently under peer review).
- Additional clarification is required as to why noise study requirements are identified along the north side of Fairway Road South and not the east side of Courtland Avenue East. The area of future transportation noise exceedance appears to be more significant on each side of the Courtland right-of-way compared to Fairway. Does this difference relate primarily to the influence of stationary sources? Please provide some clarity (as per the first bullet, distinguishing among types A, B, and C would be helpful).
- Redevelopment may be proposed on parcels identified in Figures 19-21 that conforms to the Official Plan and zoning by-law and therefore does not require a Planning Act application. Regional staff note that Section 41 of the Planning Act does not allow for the assessment of noise and compatibility through the site plan process and noise study requirements should be implemented through a holding provision.
- Staff note that the study includes an assessment of noise and vibration associated with ION Stage 1. The City is advised that these impacts are typically not required to be assessed, with the exception of limited instances in which

sensitive uses are proposed at grade within close proximity, on the basis of ION-specific analysis undertaken in advance of system launch. This is most relevant in relation to Figures 10 and 20 along Traynor Avenue and Balfour Court – although these properties are within 200 metres of a Regional road (Fairway Road South) and could still require a noise study to assess site- and development-specific impacts.

Conclusions

Thank you once again for the opportunity to provide comments regarding the proposed changes. Please do not hesitate to contact the undersigned at

[REDACTED] with any questions. Regional staff request circulation of the draft OPA and ZBA when available.

Yours truly,



Wil Towns, MCIP, RPP
Senior Planner

Encl: Growing Together East – Regional comment tracking file
YKF Proposed AZR – Growing Together East: Fairway and Block Line MTSA mapping

Cc: Adam Clark, Senior Urban Designer, City of Kitchener
Alyssa Bridge, Manager, Development Services, Region of Waterloo

COMMENT FORM: (DRAFT) Land Use Policies & Zoning Brief								
Submittal Name			(DRAFT) Recommendations Report: GTE Land Use Policies & Zoning Brief					
Circulation Date			February 20, 2025					
Comment Response Due Date			March 10, 2025					
S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
1	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Official Plan Changes	3	Please revise Policy #2 to read: “Development within the Block Line, Fairway and Sportsworld PMTSAs will protect for existing and planned transit system infrastructure and transit vehicle movement and routing in consultation with the Region of Waterloo.”
2	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Official Plan Changes	3	Please add a policy closely similar to, or with the exact wording as ROP policy 5.A.3, recognizing that development proponents may be responsible for provision of transit infrastructure and easements to support the development and operation of the Regional transit system.
3	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Zoning By-law Changes	5	<p>Regional staff request the inclusion of a holding provision within the proposed zoning by-law for all properties located within 40m of the of the ION LRT Line and within 40m of the Regional Council approved Stage 2 ION (S2ION) alignment. For clarity, where the alignment is within a municipal or Regional right-of-way, the 40m would be measured from the centre line of the road. (This could be discussed in a separate section of the brief, much as noise policies are described.) a holding provision related to the ongoing operation and future construction of ION Rapid Transit.</p> <p>The intent is to ensure future development is integrated with and does not negatively impact existing transit operations and future planned expansion to Rapid Transit services and infrastructure in these PMTSAs -- the objective for applying the H in relation to Stage 1 lands is to protect for the potential impact of track crossings on LRT operations, while for Stage 2 lands, the rationale is to ensure that development plans reflect up-to-date plans for ION Stage 2. This Holding provision would be lifted upon the submission of a Transit Assessment completed by a Qualified Person to the Region's satisfaction. (Note that it may be included as a component of a TIS if one is required.) The Transit Assessment is required to identify any impacts of a proposed development on the existing ION LRT operations/stations and on the Regional Council Approved S2ION Rapid Transit alignment. If impacts are anticipated, appropriate measures should be recommended, with any implementation costs to be the responsibility of the proponent. If a development application on lands subject to the H proposes a crossing of the ION LRT or S2ION alignment, the Transit Assessment will recommend the completion of any additional studies as appropriate, such as a Railway Safety Analysis. Crossings/private access points would also be the responsibility of proponents, and any crossings of the S2ION alignment established in advance of construction may be temporarily closed/restricted to facilitate construction.</p>
4	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Zoning By-law Changes	5	Please consider more specific Bike parking requirements within zoning (Zoning bylaw 2019-051) for the PMTSAs in Growing Together East

COMMENT FORM: (DRAFT) Land Use Policies & Zoning Brief								
Submittal Name			(DRAFT) Recommendations Report: GTE Land Use Policies & Zoning Brief					
Circulation Date			February 20, 2025					
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S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
5	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Zoning By-law Changes	5	<p>GRT understands that the City of Kitchener has recently approved, and is in the process of adopting, Zoning bylaw 2019-051. This bylaw, in section 5.5 outlines bicycle parking stall provisions. Staff note that the access aisle abutting the bicycle parking stalls must be a minimum of 1.5m in width. Staff note that section 5.5 does not deal with stacked bike parking.</p> <p>GRT has noted development applications within the City of Kitchener that propose all Class A bicycle parking be in stacked racks with access aisles as narrow as 1.5m, which meets the city of Kitchener bylaw. TDM staff are concerned that such an arrangement would greatly reduce the ability for all cyclists to readily retrieve bicycles from the top racks, as well as not be able to accommodate non-standard bicycle types (including tricycles, cargo bikes, fat tire bikes, e-bikes, trailers, and childrens' bikes).</p>
6	2025-03-11	Bridget Coady	Region	GRT	Transit Services	Draft Zoning By-law Changes	5	<p>The City of Toronto has recently approved Item - 2025.PH18.3 - Recommended Parking Requirements for New Development - Accessible, Bicycle, Visitor. GRT TDM staff recommend this document be used as a benchmark to improve the bike parking provisions in the zoning by-law to better accommodate stacked bicycle racks, and a larger variety of bicycle types. The Toronto amendment includes:</p> <ul style="list-style-type: none">- Access aisle widths of 2.5m when stacked bicycle storage is being used.- The addition of oversized bike parking spaces (0.6m longer and 0.4m wider than standard), and a requirement that a minimum of 5% of bike parking be “oversized”.- A requirement that at least 40% of the bike parking cannot be stacked (on either level of the rack, and including vertical hangars).- Requirements around access, specifically addressing the path of travel to the bike parking (direct and unobstructed, clearly identified, not over soft landscaping, path width of 1.8m and maximum slope of 7%, etc.). <p>Resources:</p> <ul style="list-style-type: none">- https://secure.toronto.ca/council/agenda-item.do?item=2025.PH18.3- https://www.toronto.ca/legdocs/mmis/2025/ph/bgrd/backgroundfile-252034.pdf
7	2025-03-11	Will Towns	Region			Draft Zoning By-law Changes	7	<p>The City is asked to share mapping associated with the proposed holding provision for sanitary servicing in the Sportsworld MTSA once prepared for awareness, comment and confirmation by Regional Water Services staff.</p>

COMMENT FORM: (DRAFT) GTE Transportation Recommendations Report								
Submittal Name			DRAFT Recommendations Report: GTE Transportation Study					
Circulation Date			February 20, 2025					
Comment Response Due Date			March 10, 2025					
S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
1	2025-03-11	Will Towns	Region	Growth, Development & Sustainability	Planning	1.1.4	3	Thanks for the identification of key AT gaps by MTSA. Comments on the recommendations in each MTSA are provided below -- the consultant can cross-reference the summary of key gaps on p.3 with the Region's approved 2025 Transportation Capital Program, the Stage 2 ION Transit Project Assessment Process functional design, and t/or the RTMP 2018 as applicable. - Courtland Ave E: widenings being taken as redevelopment occurs on north side south of the Hwy 7/8 on-ramp, allowing for cycling facility addition, though not yet identified in TCP. Re: MUT continuation south/east of Hayward -- space adjacent to rail corridor is a limiting factor but the Region will take this into consideration. - ION-adjacent MUT, FWY: Presuming this bullet refers to where the MUT meets Wilson Ave, this connection could be made more cleanly to ION through the introduction of Stage 2. Regional staff will consider at the detailed design stage. - Sportsworld Dr identified for separated cycling facilities in RTMP 2018; roadworks planned for 2026/2027 in TCP. Will account for connections in this work. Additionally, extension of cycling facilites between Sportsworld MTSA and Cambridge and identification of midblock crossings in ION Stage 2 detailed design are on our radar as well.
2		Matthew O'Neil	Region	Transportatio n Services	Rapid Transit	General	N/A	Rapid Transit staff note that proposed changes to land use may increase traffic volumes such that reducing the approved River Road Extension cross-section from four lanes to two (to accommodate ION Stage 2) becomes problematic.
3	2025-03-11	Bridget Coady	Region	Transportatio n Services	Transit Development (GRT)	General	N/A	In all applicable descriptions and mapping and in particular the draft land use and zoning mapping, please identify the existing GRT and Metrolinx Bus Terminals (Sportsworld Crossing Road and Sportsworld Drive, Fairway Road and Wilson Ave) and GRT’s planned Bus Terminal at Courtland Ave and Block Line Road.
4	2025-03-11	Bridget Coady	Region	Transportatio n Services	Transit Development (GRT)	General	1, 7-8, 20, 85, 95, 98, 125, 130	Replace references to ION LRT with “ION Rapid Transit” throughout the document in relation to Stage 2 ION to reflect the potential for different rapid transit technologies in the planned extension from Fairway to downtown Galt in Cambridge. Examples include the intro section and summary recommendation tables (i.e. Tables 2-2, 2-3, 3-4; etc.). This is esepcially important where references are made to LRT in Sportsworld Station area. Please make this change in relation to instances of LRT corridor, system, Phase 2, etc. as applicable on the pages listed int he adjacent cell.

COMMENT FORM: (DRAFT) GTE Transportation Recommendations Report								
Submittal Name			DRAFT Recommendations Report: GTE Transportation Study					
Circulation Date			February 20, 2025					
Comment Response Due Date			March 10, 2025					
S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
5	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	2.2	8	In the discussion of Alternative Solution 3 and the following tables (Tables 2-3, 2-4, 2-5, etc.), please include the applicable figure showing the location and extent of the proposed improvements, immediately following or before the applicable table, or include a reference to the applicable figure so that it can be readily linked or searched for in the document. For example, Table 2-4 “Alternative Solution 3 – Block Line Transportation Improvements” refers to a “Local Road A” with no description re: the location of this proposed improvement, which isn't apparent until Figure 7-1 titled “Block Line PTMSA Recommended Street Network” is introduced, which shows the location of this proposed improvements. This revision will improve clarity and interpretation in the document. Hyperlinks would also help with readability, as an alternative to reorganizing/rearranging figures.
6	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	2.3	8	Within the Transit Network Improvement description for Block Line MTSA in Table 2-4, please include the following statement: "GRT is in the beginning stages of planning a bus terminal at Block Line Station. this terminal will facilitate the expansion of transit service to southwest Kitchener" and indicate that the construction of S2 ION is a major planned improvement in the MTSA. These could also be added to Table 2-1 re: Alternative Solution 2
7	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	2.3	9	The Pedestrian Network Improvements discussion in Table 2-5 does not contemplate improving pedestrian connectivity across the existing ION alignment in the Fairway PMTSA. Vanier community members north of the Stage 1 ION alignment have made it clear (through formal submissions and trespassing/vandalism to fencing) that more pedestrian connections mid-block to Fairway Road should be provided. Currently one formal pedestrian connection exists “mid-block” between 600 and 642 Fairway Rd S. The consultant and/or City is encouraged to identify other locations for track crossings.
8	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	2.3	10	These roads are incorrectly labelled as an “Existing Major Road” on Figure 7-3 -- it is the Region's understanding that these roads are private, and have not been assumed by the City. Existing conditions and geometry suggests an existing classification similar to a local road or access lane rather than a major road. Significant improvements would be required to meet a “major” standard. If warranted, consider identifying the required upgrades.
9	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	2.3	10	Please reconsider inclusion of proposed Laneway A in Sportsworld MTSA as a recommendation. All lands northeast of Laneway A are subject to MTO restrictions/permitting/plans. Constructing a road that marginally increases connectivity yet must be maintained in perpetuity may not be an efficient investment, increasing maintenance and environmental costs (e.g. salt application) with limited public benefit. This should be reflected on Figure 7-3 as well.

COMMENT FORM: (DRAFT) GTE Transportation Recommendations Report								
Submittal Name			DRAFT Recommendations Report: GTE Transportation Study					
Circulation Date			February 20, 2025					
Comment Response Due Date			March 10, 2025					
S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
10	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	3.1	11	<p>Please consider the following updates to future iterations of this report and/or similar evaluations to improve robustness of the evaluation criteria:</p> <ul style="list-style-type: none">- Adding a metric related to gaps in AT connectivity to transit under “Connectivity”- Addressing vulnerable users under “Experience and Safety”, e.g. considering needs of children and older adults in design through a metric for the provision of public benches- Adding a metric to protect space for bike sharing pads/ micromobility parking under “Technological Innovation” <p>Please also reference GRT’s Bus Stop Design Guidelines to inform the Evaluation Criteria, where details re: vehicle dimensions, or minimum operating space requirements, and stop placement have been detailed. The consultant should contact BCoady@regionofwaterloo.ca for a copy of these guidelines.</p>
11	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	4.1.5	33	<p>GRT staff have concerns about applying the RTMP mode share data for school buses in PMTSAs where no additional land has been allocated for schools (i.e. Institutional designation). The school bus mode share is shown to decrease in the future state, even while population across all PMTSAs is expected to increase. Of particular concern is the application of this decreasing mode share to Sportsworld, where all existing school aged children are bused as there are no schools within the PMTSA. The population has been forecast to more than double at Sportsworld, yet the mode share for school busing is forecast to decrease. Please provide justification for how this assumption has been developed and applied or refine/develop a different mode share for school-related busing.</p>
12	2025-03-11	Will Towns	Region	Growth, Development & Sustainability	Planning	5.3		<p>Please note that recommendations pertaining to new signals at King St E/Heldmann Rd, Limerick Dr, etc. will be subject to further review and analysis as part of the S2 ION detailed design work to proceed after completion of the ongoing Business Case.</p>
13	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	6.2	97-98	<p>Consider removing the area of undevelopable land west of the Activa Sportsplex from the total developable area calculation within the Block Line PMTSA. This land is designated Natural Heritage System-Woodland in the City’s Official Plan. If removed, the percentage of lands within 250m of a transit stop for the Block Line PMTSA will increase. [Table 6-3, Figure 6-1]</p> <p>Additionally, the City or consultant may wish to confirm that the floodplain overlay isn’t reducing coverage - there is existing development in some portions of the floodplain in the MTSA. [Also applies to Appendix A, pp. 1-2 and 6-7]</p>

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14	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	6.2	100	The report recommends "the implementation of transit priority measures to improve the transit level of service"; however, it does not contemplate in detail the type of measures or the land required to implement transit priority measures. If for example, removal of a vehicular lane in road segment is warranted in the future to install a queue jump lane, would this not also impact future vehicle capacity and delay (LOS) in future states? Transit priority is not only a signal phase; it requires physical space as well. More information or qualifying information should be provided in this section.
15	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	6.2	100-102	GRT staff are particularly concerned with the Transit LOS analysis of the intersections showing Es and Fs. This level of service is unacceptable, but with various competing interests at these particular intersections (such as new bike lanes, accesses to new developments), GRT believes that more analysis re: transit priority measure recommendations needs to take place for these intersections and incorporated into future state capacity and LOS analysis within this document. [Table 6-5 and 6-6]
16	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	104	In addition to the Recommended Street Network and Proposed Signalizations in each PMTSA, please indicate where transit priority measures are recommended on each figure, accompanied by the type of measure and the estimated land needs to implement the measure (or at least whether additional lands would be required).
17	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	104-108	For all proposed roadways that include recommended right-of-way widths, please ensure that each width incorporates consideration for transit’s operational needs. For reference: Any lane in which transit may operate in the future will require a minimum of 3.3m width (turning lanes, through lanes) and a minimum curb lane width of 3.5m. Further, the turning radii between streets upon which transit will/may function must be at least 15m. If these widths and turning radii are not planned and designed for within the recommended new streets, it can be assumed that transit will not be able to operate. For maximum future-proofing, please ensure that all recommended right-of-way widths reflect these minimum values. [Tables 7-3, 7-4 and 7-5]

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18	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	105	<p>GRT staff are concerned about the value and implications of Local Road A in Block Line MTSA, given the significant grade change between Hayward Ave and Courtland Ave E and the subsequent engineering required to design a road in this location that meets required standards and grades (including those that support transit). Similar to comment 7 above re: Laneway A in Sportsworld MTSA, this new road will only have development potential on the eastern side, as the west is encumbered by the rail line. It also introduces the requirement for two additional vehicle crossings of the LRT alignment at Hayward and Courtland, which is undesirable from an LRT operations perspective.</p> <p>Further, GRT has begun planning for a bus terminal at Block Line Station, and the operation of this facility should take priority over this segment of Local Road A. Note also that the development of a bus terminal may have impacts on the exact location/geometry of Future Local Road A. Consider a more conceptual framing for this connection if carried forward, similar to those across the Fairview Park Mall property on Figure 7-2.</p>
19	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	105	<p>Consider if Block Line PMTSA could benefit from another Minor Collector -- for instance, by extending Siebert Ave south of Courtland then northeast to connect with “Minor Collector A” at Manitou Dr within the Fairway PMTSA. Several of the concerns raised in the previous comment may apply to this connection as well (this collector is adjacent to the rail line, so only the northernmost side is developable, etc.), but a collector of this nature would extend alternative route options for busses and private vehicles on roads other than Fairway Road for a longer portion of the Fairway/Courtland corridor.</p>
20	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	107	<p>On Figure 7-2, please shift the “Laneway A” and “Laneway B” labels off of the ION alignment and south to the planned laneways. Please also correct the label on the ION alignment west of Wilson Ave on Figure 7-2.</p>
21	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	107	<p>Please consider an additional “Minor Collector E” to Figure 7-2 between Kingsway Dr and Fairway Road at the only existing signalized intersection to Fairview Mall on Fairway Rd S.</p>
22	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	107	<p>Please add a “Stop Controlled Intersection” symbol to the intersection of Laneway B and Wilson Ave on Figure 7-2. This symbol seems to have been inadvertently missed. GRT notes this area is already congested and complicated by LRT signals and bus movements.</p>

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23	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.1	108	Several roads on this map are misclassified on Figure 7-3. Both Sportsworld Crossing Rd and Heldmann Rd are not “Existing Major Roads” (privately owned, not assumed by the City, and not constructed or maintained to a “major” standard. Additionally, the segment of Sportsworld Crossing Road east of Local Road D and Sportsworld Drive, is owned entirely by the MTO; buses operating on this segment are subject to an operating agreement. If these roads are intended to become “Major Roads” that are assumed by the City of Kitchener then the map should be updated to show the red hashed line for the entirety of these roads. Clarification should be provided either way.
24	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.4	115	Please note that GRT is contemplating removing service along Lennox Lewis Way between Hayward Ave and Block Line Road. If public recreation facilities should be redeveloped and transit is warranted in the future, appropriately-spaced stops will also be implemented.
25	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.4	115	Residential developments along Courtland Ave located between Shelley Dr and Manitou Dr also have frontage on Vanier Dr and are well-served by GRT by stops located on Vanier Drive. As the majority of the southwestern side of Courtland Ave is shown to be floodplain and open space within the draft land use plans and zoning, until new residential development is proposed on the small developable parcels and demand warrants, it is unlikely that new bus stops will be implemented.
26	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	7.4	116	As per comments above, Transit Priority Measures should not only be considered for intersections below LOS C. Instead, TPM should be considered at all intersections within PMTSAs to make transit more competitive with personal automobile trips. GRT staff recommend an addendum to the analysis to specifically recommend preferred transit priority measures at key/all transit corridor intersections, and the amount and general location of land associated with the preferred measure (at least for all intersections with a City road component). Retrofitting intersections and corridors with transit priority measures after the fact is extremely difficult and costly. Given the purpose and intent of this OPA/ZBA, strategic planning for transit operations and its associated lands needs should be integrated and prioritized within land use decisions. Please consider amending this document to include more in depth locational and land area needs for transit priority measures.

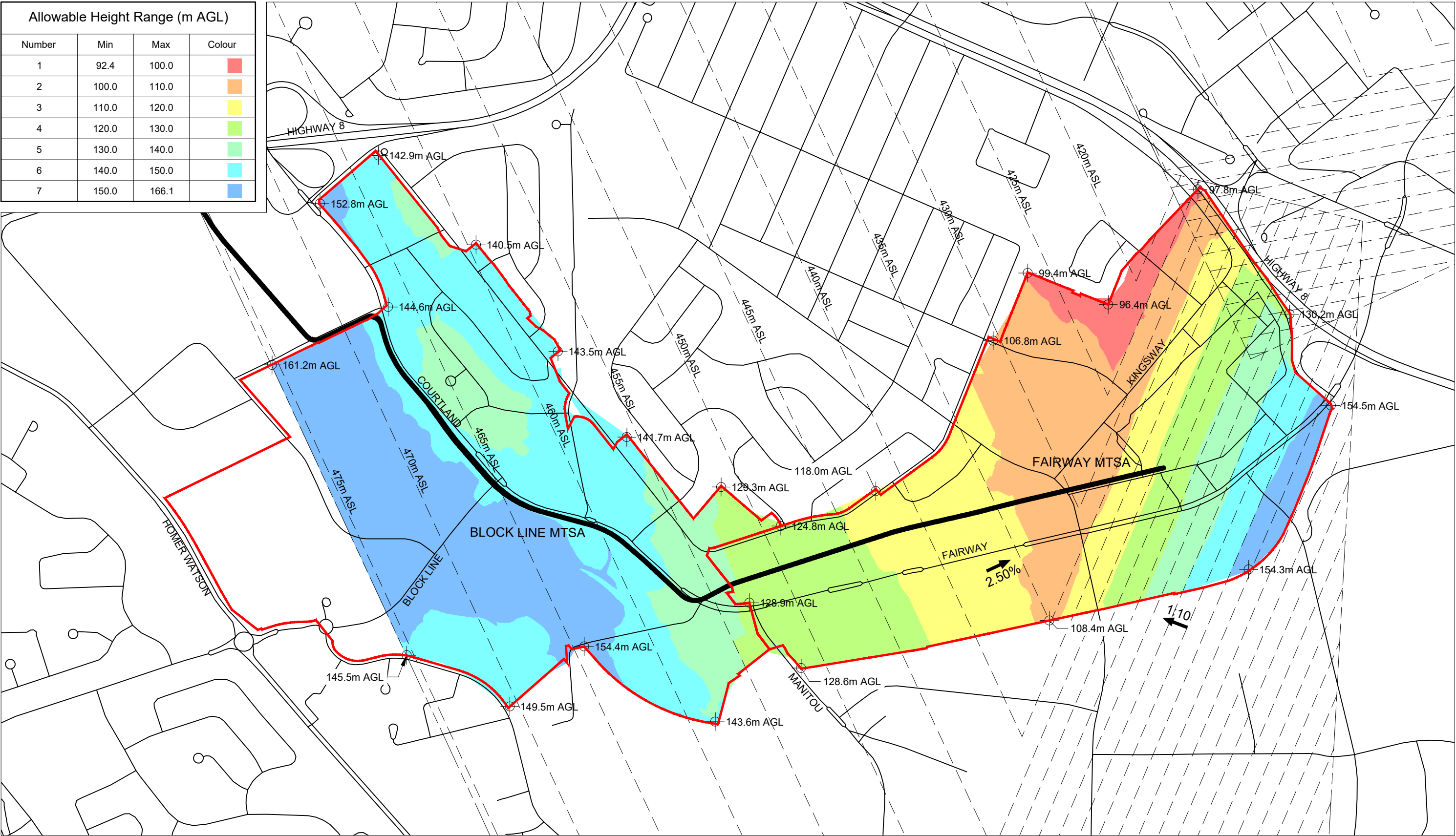
COMMENT FORM: (DRAFT) GTE Transportation Recommendations Report								
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27	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (TDM)	8.5	125-129	Section 8.5 recommends that TDM Strategies will need to be reviewed by Transit Development staff, which the Region supports. Subsidized transit passes were also provided as an example of a TDM measure, and development proponents should be aware that this initiative requires a commitment from the owner/applicant to manage, administer, and fund the full cost of monthly transit passes for residents. GRT notes that the TDM checklist needs to be required for developments for which a Regionally-requested Transportation Impact Study is provided.
28	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (TDM)	8.5	129	Consider the following additional TDM goals: - Create a neighbourhood where AT is safe, convenient, and permitted on all streets (this would require reducing the speed limit on Fairway to 50km/h to permit e-scooters on the roadway) - Create a neighbourhood where carshare is a convenient and promoted option (requiring a certain number or percentage of carshare spaces in every development, plus requiring those spaces to be “convenient” i.e. near building entrances) - Create a neighbourhood that supports shared micromobility (every street permits micromobility use, and every development has micromobility parking) - Create a neighbourhood that supports All Ages and Abilities (AAA) cycling, through cycle tracks and MUTs, but is also future-proof for high cycling, micromobility, and pedestrian mode share by providing bike lanes in addition to AAA facilities.
29	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	9	133	Please include or revise the final bullet under "Transit Network" with a statement to the effect of: “Future development in the vicinity of existing or planned ION rapid transit stations will be designed to avoid impacts to existing and planned transit access and operations into and out of rapid transit stations.”


COMMENT FORM: (DRAFT) GTE Transportation Recommendations Report								
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30	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	10.1	136	<p>Building on comments above: Table 10-1 indicates that Transit Priority Measures are the primary responsibility of GRT and will be implemented through the GRT Business Plan. This is not entirely true. While GRT can budget for and construct TPM through the GRT Business Plan, obtaining space required for transit priority measures is typically negotiated through development approvals and capital projects. Therefore, TPM and the land needed for construction should be implemented in the same way as recommended in the Transit Assessment for intersection signalization or planned local roadways and minor collectors. The location and approximate area of these measures needs to be identified and protected for within the Official Plan policies/designations and zoning by-law. If this necessary planning is not completed, future implementation may not be possible or will be implemented in ad hoc and infrequent ways, as budgets permit.</p> <p>GRT recommends additional analysis be undertaken as part of this Assessment as an addendum to this report. However, if the City is amenable and as an alternative to more detailed analysis at this stage, GRT recommends that the land use policies and zoning by-law regulations protect for transit-only curb lanes (for dedicated bus travel, turning movements and queue-jumping) along all segments identified on the Draft Priority Street Map. Critical intersections in this regard include Block Line/Courtland, Fairway/Wilson and King St E/Sportsworld Drive.</p>
31	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	Appendix A	General	Consider including titles for all maps in Appendix A.
32	2025-03-11	Bridget Coady	Region	Transportation Services	Transit Development (GRT)	Appendix A	5	Please remove the “ION Stop” label from the joint GRT/Metrolinx terminal on Sportsworld Drive. With the introduction of LRT to Cambridge, the 302 ION Bus will be redundant and likely discontinued. For the longer-term purpose of these maps, the additional stop may be confusing.

COMMENT FORM: (DRAFT) Recommendations Report: GTE Noise Study								
Submittal Name			(DRAFT) Recommendations Report: GTE Noise Study					
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Comment Response Due Date			March 10, 2025					
S.No.	Date (yyyy-mm-dd)	Name	Agency	Department	Division	Section	Page	Comment
4	2025-03-18	Will Towns		Growth, Development & Sustainability	Planning	4.1.3	7	Staff note that the study includes an assessment of noise and vibration associated with ION Stage 1. The City is advised that these impacts are typically not required to be assessed, with the exception of limited instances in which sensitive uses are proposed at grade within close proximity, on the basis of ION-specific analysis undertaken in advance of system launch. This is most relevant in relation to Figures 10 and 20 along Traynor Avenue and Balfour Court – although these properties are within 200 metres of a Regional road (Fairway Road South) and could still require a noise study to assess site- and development-specific impacts.
1	2025-03-18	Will Towns	Region	Growth, Development & Sustainability	Planning	9	21	Figures 19-21 indicate properties at which noise impact studies are recommended given that exceedances could occur. Limited detail about these are provided, though the implication is that they're required based on adjacency to a major facility or corridor. Confirmation in this regard would be helpful. Staff note that in the case of 808-836 Courtland Avenue East (identified on Figure 19), a noise study was recently completed as part of a OPA/ZBA application (currently under peer review).
2	2025-03-18	Will Towns		Growth, Development & Sustainability	Planning	9	21	For instance – why are noise study requirements identified along the north side of Fairway Road South and not Courtland Avenue East? The area of future transportation exceedance appears to be more significant on each side of the Courtland right-of-way compared to Fairway. Does this difference relate primarily to the influence of stationary sources? Please provide some clarity.
3	2025-03-18	Will Towns		Growth, Development & Sustainability	Planning	9	21	Should redevelopment on parcels identified in Figures 19-21 occur that conforms to the Official Plan and zoning by-law and therefore does not require a Planning Act application, it is unclear how a noise study would be triggered. Staff note that Section 41 of the Planning Act does not allow for the assessment of noise and compatibility through the site plan process.

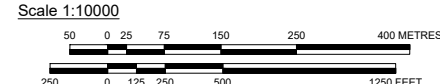

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Allowable Height Range (m AGL)			
Number	Min	Max	Colour
1	92.4	100.0	
2	100.0	110.0	
3	110.0	120.0	
4	120.0	130.0	
5	130.0	140.0	
6	140.0	150.0	
7	150.0	166.1	





Region of Waterloo
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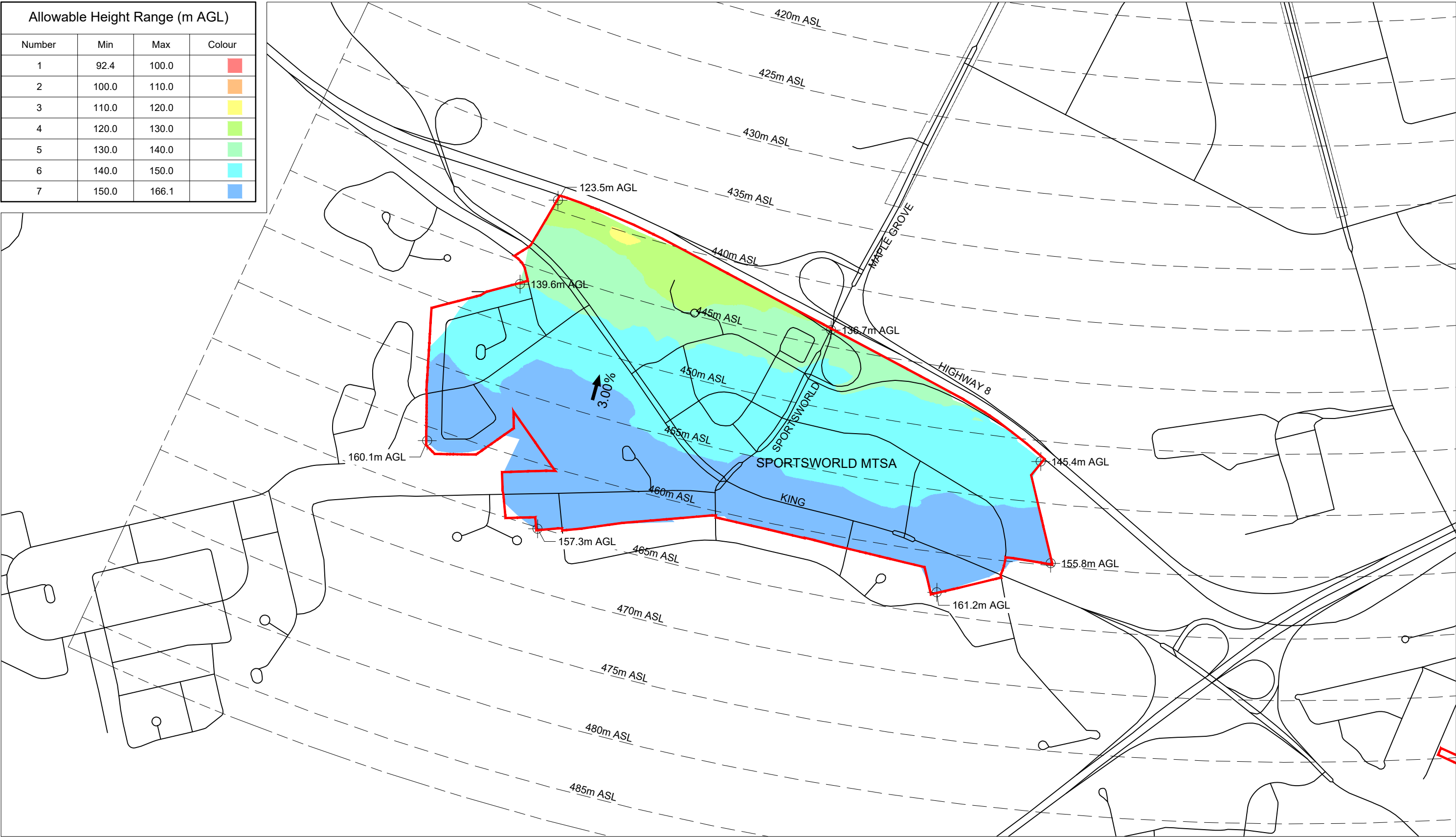
Region of Waterloo

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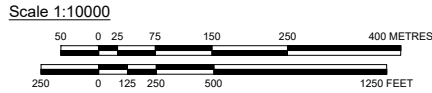
YKF Proposed AZR
City of Kitchener
Growing Together East
Fairway and Blockline MTSA

DATE: 2025-03-19
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Allowable Height Range (m AGL)			
Number	Min	Max	Colour
1	92.4	100.0	
2	100.0	110.0	
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4	120.0	130.0	
5	130.0	140.0	
6	140.0	150.0	
7	150.0	166.1	



Region of Waterloo
INTERNATIONAL
AIRPORT



Region of Waterloo

SCALE	1:10,000
DATE:	March 19, 2025
DRAWN BY:	JV
DWG No.	SK2

YKF Proposed AZR
City of Kitchener
Growing Together East
Sportsworld MTSA

From: [Jason Lambropoulos](#)

To: [REDACTED]

Attachments:

[Build Waterloo Region - SGA East Site-specific Cover Letter.pdf](#)

[Build Waterloo Region - SGA East Site-specific Planning Justification.pdf](#)

You don't often get email from jlbropoulos@regionofwaterloo.ca. [Learn why this is important](#)

Hi Natalie,

Further to our previous correspondence with the Growing Together team, and email request from Matthew Rodrigues at the end of last year, the Waterloo Region team at the Region of Waterloo has prepared a scoped planning justification, conceptual designs for the site, and our assessment of the requested changes to the SGA land use and zoning against the City's Official Plan Policy 15.D.2.5 for Region-owned land at Courtland Avenue and Shelley Drive, Kitchener.

Since our last email, it is understood that the Waterloo Region Housing/Affordable Housing Development project team for 440 Shelley Drive provided a site-specific submission for the eastern portion of the land and discussion regarding the change to this zoning has been held between Growing Together Staff and Waterloo Region Housing.

Please see attached the Build Waterloo Region team's planning justification and additional information seeking changes to the proposed draft zoning and land use designation for Region-owned land in the Blockline MTSA. We appreciate your collaboration in this matter and look forward to discussing the site-specific changes further.

Kind regards,

Jason Lambropoulos MSc Spatial Planning, BPlan

Senior Development Planner

Region of Waterloo | Build Waterloo Region

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Confidentiality Notice: This email correspondence (including any attachments) may contain information which is confidential



24 March 2025

City of Kitchener
Planning Division
200 King Street West
City of Kitchener

Sent via Email: Natalie Goss, Manager Policy
Natalie.Goss@kitchener.ca
growingtogether@kitchener.ca

Dear Growing Together Team,

**Re: Scoped Planning Justification from Build Waterloo Region (Region of Waterloo)
City of Kitchener Strategic Growth Area (SGA) Zoning – Growing Together East**

On behalf of the Region of Waterloo's Build Waterloo Region division, we thank you for the opportunity to present our comments related to the Strategic Growth Areas (SGA) zoning under City of Kitchener's Growing Together East strategy.

An initial submission was made December 2024 to City of Kitchener staff regarding the strategy and rezoning as relevant to lands owned by the Region of Waterloo. Following this correspondence, the Build Waterloo Region division has prepared the information requested by the Growing Together team including a scoped planning justification, conceptual designs, and our assessment of the requested changes to the SGA land use and zoning against the City's Official Plan Policy 15.D.2.5.

Build Waterloo Region is a cross-divisional team at the Region which works in the management and development of the Region's land portfolio including surplus lands, Waterloo Region Housing lands, and other properties under the Region's ownership. Build Waterloo Region aims to activate Regional lands for the purposes of affordable housing both within standalone developments and as part of higher density mixed-use buildings where achievable.

We kindly request your consideration of the enclosed scoped planning justification report, provided in the interest of optimizing regional land for needed growth with respect to housing density. We look forward to seeing this new framework take shape within the Growing Together East boundaries and continuing to work with City of Kitchener staff to advance our shared priorities on these properties.

Kind regards,

A handwritten signature in blue ink, appearing to read "J. Lambropoulos".

Jason Lambropoulos
Senior Development Planner, MSc Spatial Planning, BPlan
Build Waterloo Region (Region of Waterloo)



24 March 2025

City of Kitchener
Planning Division
200 King Street West
City of Kitchener

Sent via Email: Natalie Goss, Manager Policy
Natalie.Goss@kitchener.ca
growingtogether@kitchener.ca

PLANNING JUSTIFICATION BRIEF
1050 Courtland Avenue East, Kitchener
Build Waterloo Region submission on draft land use and zoning
City of Kitchener Strategic Growth Area (SGA) Growing Together East

Introduction

On 13 December 2024, the Build Waterloo Region (BWR) division provided a written submission to the City of Kitchener regarding the Strategic Growth Area East (SGA) Draft Land Use and Zoning as part of its Growing Together strategy. The submission letter provided commentary and feedback regarding the proposed draft land use and zoning changes, as they relate to Regionally-owned sites within the Growing Together East boundaries.

In particular, the December 2024 submission sought an alteration to the proposed zoning of the Region-owned land at 1050 Courtland Avenue East, Kitchener. This land is proposed to be zoned SGA-2 in the SGA East Draft Zoning, with a maximum permitted height of eight (8) storeys. Build Waterloo Region request the City consider the site be designated SGA-C and zoned SGA-3 to reflect the land use goals within the Block Line MTSA.

The Growing Together team, in its response dated 19 December 2024, requested the Build Waterloo Region division address the following criteria that applies to landowner requests for changes to draft land use and zoning:

- *Proof of lot ownership*
- *A conceptual design that demonstrates compliance with the desired zone and refers to the zone standards approved through Growing Together West*
- *A scoped planning justification addressing Official Plan Policy 15.D.2.5, which requires:*
 - *demonstration of compatibility with the planned function of the lands and adjacent lands;*
 - *suitability of the lot for the proposed use or built form;*
 - *lot consolidation;*
 - *compliance with Kitchener's Urban Design Manual and Official Plan urban design policies;*
 - and*
 - *consideration of cultural heritage resources.*



On March 10, 2025 a separate planning justification submission was submitted to City of Kitchener staff on behalf of the Waterloo Region Housing project team regarding the site at 440 Shelley Drive. Following this submission, the Growing Together Team confirmed that an SGA-B land use and SGA-3 zone will be recommended for this property. As such, this letter addresses the criteria above in relation to requested changes to the designation and zoning for the land at 1050 Courtland Avenue East, noting City of Kitchener staff have acknowledged SGA-B land use and SGA-3 zoning will be contemplated for the land at 440 Shelley Drive.

Background

On 18 March 2024, the Kitchener City Council approved 'Growing Together West', the first phase of Official Plan and Zoning By-law Amendments to introduce new Strategic Growth Area (SGA) land uses and zones within seven (7) of ten (10) Major Transit Station Areas (MTSA) along the ION LRT system line.

The next phase of the Strategic Growth Area reform, 'Growing Together East', will update the planning framework for the remaining three (3) MTSA's within the vicinity of existing and future ION LRT stops at Block Line, Fairway and Sportsworld. These changes are currently being exhibited.

The BWR division (formerly Land Portfolio) of the Region of Waterloo have previously provided comment to City of Kitchener planning policy staff regarding the first phase of SGA land use and zoning as they relate to lands owned by the Region of Waterloo. Site-specific feedback regarding the proposed land use and zoning changes that applied to Region-owned properties within the Growing Together West area was put forward, with the simplified zoning approach and focus on supporting well-located growth and development opportunities to meet housing targets being supported.

Context

The subject sites at 1050 Courtland Avenue East, Kitchener is legally known as:

- PLAN 1206 PT BLK E; KITCHENER

The land is large, irregular shaped and bound to the east by a residential development owned by the Region of Waterloo, and to the west by Courtland Avenue (80.6m frontage). The site at 1050 Courtland Avenue has an area of 7,953.38m².

The site is located at the south-western corner of the Vanier Neighbourhood, opposite the intersection of Courtland Avenue and Block Line Road. The surrounding locality is characterised by low-density single-family homes to the north and north-east, a 10-storey condominium building and commercial plaza adjoining the site to the south, and larger lots of undeveloped land to the west of Courtland Avenue. The site is within close proximity to commercial and employment lands in the broader locality including the Trillium Industrial Park approximately 1.1km south-east of the site, and the Fairway Road commercial strip 1km to the south-east.

The site is also within proximity to nearby schools, public parks, and natural open space including St Mary's Secondary School (450m south-west), Wilson Avenue Public School (550m north-east), Wilson Park (370m north-east), and the Balzer Creek Natural Area (750m south).

The site currently contains two storey townhouse development operated by Waterloo Region Housing (WRH). Vehicular access is provided from both Courtland Avenue and Shelley Drive, with at-grade parking provided across the site.

The subject site and surrounding development context are depicted in the aerial photograph below:



Source: Region of Waterloo Esri Mapping Tool

Planning Analysis

Current Designation and Zoning

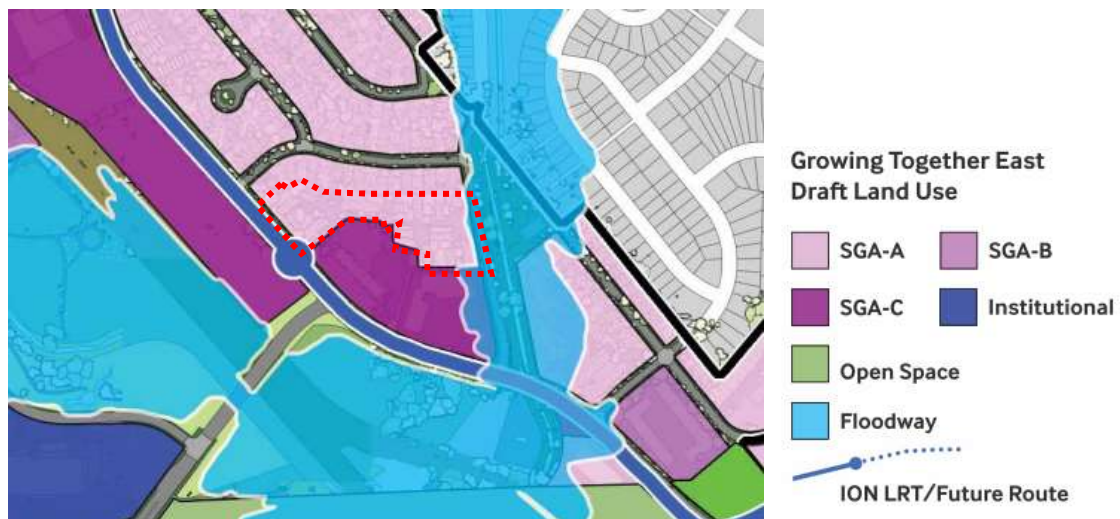
- **Regional Official Plan:** The subject lands are designated as 'Build-Up Area' pursuant to the Region of Waterloo Regional Official Plan. Following the gazettal of Bill 23, *More Homes Built Faster Act, 2022*, the Regional Official Plan will continue to be implemented under the responsibility of the area municipalities, until local Official Plan review processes are undertaken which incorporate the ROP policies within the area municipal plans. A Memorandum of Understanding has been established amongst the Region and area municipalities which identifies that ROP policies will continue to be implemented to ensure consistency across the Region including, but not limited to, matters of intensification corridors, growth management, industrial land use compatibility, transit, and population and employment forecasts.
- **City of Kitchener Official Plan 2014:** The subject lands are within the 'Built-Up Area' of the City of Kitchener and are currently designated as 'High Rise Residential' in the City of Kitchener Official Plan (2014). The lands are also identified as a 'Protected Major Transit Station Area' by the City's Official Plan.
- **City of Kitchener Zoning By-Law 85-1:** The City of Kitchener Zoning By-law 85-1 zones the lands as R-9 which permits a maximum floor space ratio of 4.0, with no maximum height limit. Permitted uses within the zone include a range of higher density residential uses such as multiple dwellings and street townhouse dwellings, as well as commercial uses such as financial establishments and offices.

Draft Land Use Designation and Zoning – Growing Together East

- **Land Use:** The proposed land use for the site is for an SGA-A designation which is defined as:

“The Strategic Growth Area A land use designation is generally intended to accommodate intensification within existing predominantly low-rise residential neighbourhoods, lands further away from Rapid Transit station stops, and/or lands where existing lots are generally too small to support high rise buildings. It is anticipated that the majority of development and/or redevelopment will occur through infill including missing middle housing and compatible non-residential uses.”

The proposed draft land use is depicted in the map extract below.



- **Zoning:** The proposed zoning for the site is SGA-2 Mid-Rise Growth Zone, which seeks to create opportunities for moderate growth in mid-rise forms up to 8-storeys in height and will permit a mix of residential and non-residential uses including *multiple dwellings, street townhouse dwellings, offices and retail.*

The proposed draft zoning is depicted in the map extract below.



- Zoning Regulations:** The proposed zoning regulations for *multiple dwellings* and *mixed use buildings* within the SGA-2 Mid-Rise Growth Zone include a minimum floor space ratio of 1.0, a maximum building height of 8 storeys, and minimum landscaped area of 20%. A maximum building height of 20m applies to any building within 15m of land zoned SGA-1.

Summary of proposed land use and zoning changes

The site currently contains two storey townhouse development operated by Waterloo Region Housing (WRH). The site forms part of the WRH Revitalization Plan which identifies existing affordable housing assets operated by the Region that present opportunity for additional housing through redevelopment.

Preliminary visioning has been prepared for the property at 1050 Courtland Avenue East for a 25-storey concept, being a mixed-use development potentially incorporating affordable housing, market rate housing, and activation of the ground floor level with fine-grain commercial uses.

As such, the BWR division seek changes to the proposed land use and zoning for the site to improve prospects for future redevelopment in accordance with the above, both as part of the Region's land portfolio in accordance with the WRH Revitalization Plan, and for the future envisioned development of the property at 1050 Courtland Avenue East.

It is noted that City of Kitchener staff have acknowledged SGA-B Land Use designation and SGA-3 zoning will be considered for the property at 440 Shelley Drive to accommodate the development being contemplated for this site as part of the Waterloo Region Housing portfolio.

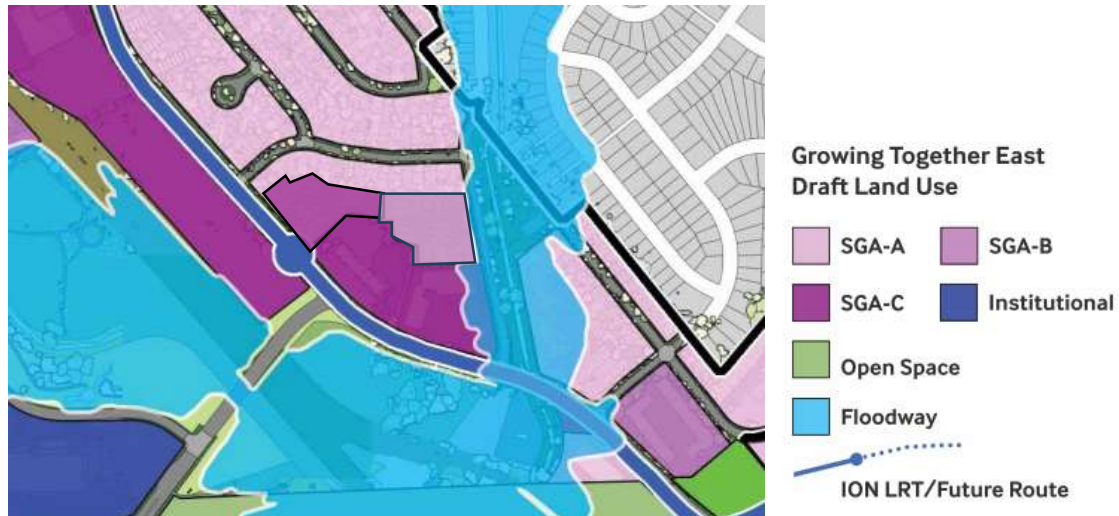
The Build Waterloo Region division proposes the following:

- Land Use:** A land use designation of SGA-C is proposed for the site to align with a proposed SGA-3 zoning. The SGA-C land use designation is defined as:

"The Strategic Growth Area C land use designation is intended to accommodate significant intensification at high density. Lands designated Strategic Growth Area C are generally located within Intensification Areas and/or represent redevelopment opportunities at higher density. It is anticipated that some areas within the Strategic Growth Area C land

use designation will require the assembly of lands for development. Further, some lands designated Strategic Growth Area C are adjacent to lands planned for medium density uses or which contain existing Low Rise Residential uses. As such, the implementing zoning may restrict building heights as an interim measure to ensure orderly development through a development application demonstrating that the policies of this plan are met.”

The resultant land use of the properties is depicted below:



- **Zoning:** It is proposed that the property be zoned SGA-3 ‘High-rise limited’, consistent with the land at 440 Shelley Drive, and the adjoining land south of the site at the intersection of Shelley Drive and Courtland Avenue.

The resultant zoning is depicted below:



- **Zoning Regulations:** The SGA-3 zone permits a height of up to 25-storeys on the land. The zone regulations for the SGA-3 zone include built form controls for transitions to low-rise zones of a 20m building height within 15m of an SGA-1 zone, and yard setback of 7.5m from the SGA-1 zone.

The uplift sought for the subject lands will support the future redevelopment of existing Waterloo Region Housing assets in accordance with the WRH Revitalization Plan. The proposed SGA-C Land Use designation and SGA-3 zoning serves to improve the economic viability of future development projects on the lands, within close proximity to well-served transit infrastructure, with appropriate considerations given to built form and density provisions from the subject sites to adjoining lands.

Description of Current Proposals

1050 Courtland Avenue East, Kitchener has not yet been formally contemplated for redevelopment, and any potential future development on this land is distinct from the Waterloo Region Housing project at 440 Shelley Drive described previously.

This portion of the site has been subject of concept modelling and massing prepared by the Build Waterloo Region team to demonstrate compliance with the proposed SGA-3 zoning for the site, as depicted below:



Source: Build Waterloo Region

The proposed modelling confirms that a 25-storey building height, designed in accordance with the built form standards for the SGA Zones, can be comfortably accommodated on the site. Further, having regard to the anticipated development densities to the south-west and south-east of the site (SGA-3 and SGA-4 zoned land), the proposed zoning will ensure a sensitive transition to surrounding draft zones – specifically proposed SGA-1 zoned land to the north containing existing single-family dwellings – can be achieved.

The below assessment table confirms the site is of adequate dimensions to accommodate development at the scale envisioned by the SGA-3 zone, and that the concept modelling for the site complies with these standards.



Table 1 – SGA-3 Zone Regulations Assessment

SGA-3 Zone Regulations	Proposal	Compliance
6.5.2 Multiple Dwellings, Mixed Use Buildings, and Non-Residential Buildings >5 storeys in height:		
For Entire Building <ul style="list-style-type: none"> • Minimum lot width 30.0m(1) • Minimum lot area 1,500m² • Minimum yard setback 3.0m • Minimum building base height 3 storeys • Maximum building base height 6 storeys • Minimum floor space ratio 2.0 • Maximum building height in the SGA-3 zone 25 storeys • Minimum street line ground floor building height 4.5m • Minimum façade openings 10% • Minimum street line façade openings 20% 	80m lot width – Courtland Avenue 7,953.38m ² site area >7.5m Base height – 4 storeys Base height – 4 storeys FSR >2.0 25-storey height Ground floor height >4.5m Achievable Achievable	Yes Yes Yes Yes Yes Yes Yes Yes Yes
For Storeys 7-12 <ul style="list-style-type: none"> • Minimum lot width 30.0m • Minimum lot area 1,500m² • Minimum front and exterior side yard setback 6.0m • Maximum building length 60.0m • Maximum floor plate area 2,000m² • Physical separation 6.0m 	80m lot width – Courtland Avenue 7,953.38m ² site area >7.5m Achieved Max floor plate <2,000sqm Internal separation not required	Yes Yes Yes Yes Yes Yes
For Storeys 13-18 <ul style="list-style-type: none"> • Minimum lot width 36.0m • Minimum lot area 1,800m² 	80m lot width – Courtland Avenue 7,953.38m ² site area	Yes Yes



<ul style="list-style-type: none"> • Minimum front and exterior side yard setback 6.0m • Maximum building length 54.0m • Maximum floor plate area 1,200m² • Physical separation 9.0m 	<p>>7.5m</p> <p>Achieved</p> <p>Max floor plate at 13-18 storeys 750sqm</p> <p>Internal separation not required</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>For Storeys 19-36</p> <ul style="list-style-type: none"> • Minimum lot width 42.0m • Minimum lot area 2,000m² • Minimum front and exterior side yard setback 6.0m • Maximum building length 48.0m • Maximum floor plate area 1,000m² • Physical separation 12.0m 	<p>80m lot width – Courtland Avenue</p> <p>7,953.38m² site area</p> <p>>7.5m</p> <p>Achieved</p> <p>Max floor plate at 13-18 storeys 750sqm</p> <p>Internal separation not required</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>
<p>Transition to Low Rise Zones</p> <ul style="list-style-type: none"> • Maximum building height within 15m of a lot with an SGA-1 zone or a lot with a low-rise residential zone 20.0m(2) • Maximum building height within 30m of a lot with an SGA-1 zone or a lot with a low-rise residential zone 30.0m(2) • Minimum yard setback where the lot abuts a lot with an SGA-1 zone or a low-rise residential zone 7.5m 	<p>Achieved – No buildings within 15m of northern boundary</p> <p>Achieved – Max. building height within 30m of northern boundary is 4 storeys (approx.. 16-20m height)</p> <p>Achieved - >7.5m setback provided to SGA-1 zone</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p>



Planning Justification

The proposed site-specific zone change to the Courtland site has been assessed against the City of Kitchener Official Plan Policy 15.D.2.5.

Policy 15.D.2.5 states:

“15.D.2.5. Notwithstanding policies 4.C.1.8 and 4.C.1.9, site specific applications which seek relief from the implementing zoning through a minor variance(s) or amendment to the Zoning By-law, and/or seek to amend this Plan will consider the following factors:

- a) Compatibility with the planned function of the subject lands and adjacent lands;*
- b) Suitability of the lot for the proposed use and/or built-form;*
- c) Lot area and consolidation as further outlined in Policy 3.C.2.11;*
- d) Compliance with the City’s Urban Design Manual and Policy 11.C.1.34;*
- e) Cultural heritage resources, including Policy 15.D.2.8; and,*
- f) Technical considerations and other contextual or site specific factors.”*

The factors for consideration are detailed within **Table 2** below.



Table 2 - Kitchener Official Plan Policy 15.D.2.5 Assessment

Factor for consideration	Comment
<i>Compatibility with the planned function of the subject lands and adjacent lands</i>	<p>In determining the compatibility of the proposed SGA-3 zoning for 1050 Courtland Avenue East with the planned function of the site and adjacent properties, an assessment is made against the envisioned land use designation, target density for the current and proposed zoning, and resultant built form outcomes for the site under the current and proposed zoning.</p> <p>The SGA-3 zoning is therefore compatible with the planned function of the site and adjacent lands based on the following:</p> <ul style="list-style-type: none">- Land Use Designation: The subject site is located within a Protected Major Transit Station Area (PMTSA) as identified by Maps 2 and 4 of the City of Kitchener Official Plan. The proposed SGA-3 zoning for the site is compatible with the planned function for a PMTSA detailed within Policy 3.C.2.17 of the Official Plan pursuant to the following assessment: <p><u>Protected Major Transit Station Area</u></p> <p><i>3.C.2.17. The planned function of Protected Major Transit Station Areas, in order to support transit and rapid transit, is to:</i></p> <ul style="list-style-type: none">▪ <i>provide a focus for accommodating growth through development to support existing and planned transit and rapid transit service levels;</i> The site is located within 130m walking distance of the Block Line ION LRT station and GRT Bus Stop ID 1458 (served by iXpress Route 202) ensuring future development is well-served by rapid transit and express bus service levels, and directly adjoins GRT Bus Stop ID 2026 (served by Route 33). As such the current proposed zoning of SGA-2 for the site, which presents lower densities than the current R-9 zoning for the land, does not serve to maximise development growth that is focused on land within close proximity to existing bus and rapid transit service levels. The site and adjacent lands therefore benefit from a high level of public transit service which provides regular access to commercial, employment, education, and recreational opportunities, and an increased density commensurate with the existing R-9 zoning of the land would be compatible with this planned function for the MTSA.▪ <i>provide connectivity of various modes of transportation to the transit system;</i> As detailed above, the site is in an accessible location benefitting from high-frequency bus and light rail transit routes. In addition, the surrounding locality is serviced by a range of pedestrian and cycling infrastructure, including dedicated bicycle lanes along Vanier Drive and Courtland Avenue, providing bicycle access to the Downtown Kitchener core (11 minute ride), and to nearby industrial and commercial employment centres to the south-east such as Fairway and Trillium Industrial Park (6 minute ride). The increased density sought for the site under an SGA-3 zone is appropriate in this regard, with residential intensification able to rely on a well-established active transportation network within the locality.



- **achieve a mix of residential, office (including major office), institutional (including major institutional) and commercial development (including retail commercial centres), wherever appropriate; and,**

The current R-9 zoning of the land pursuant to the Kitchener Official Plan Zoning By-law permits a density of 4.0 for the subject sites, with no applicable height limit in the zoning by-law. An SGA-3 zone for the site provides a height of up to 25 storeys better incentivises commercial, office, and community uses within a future mixed-use development on the site compared to the currently proposed 8 storey density pursuant to the SGA-2 draft zoning. The SGA-2 zoning limits the building height afforded to future development of the site, and we submit that an increased residential density for this larger site improves the economic feasibility of providing a mixture of uses within future Region of Waterloo developments undertaken by Waterloo Region Housing, or as a private-public partnership. The large Courtland Avenue frontage of the site presents a good opportunity to provide mixed-use development opposite the Block Line LRT station, contributing to a transit-oriented economic centre within this MTSA.

- **have streetscapes and a built form that is pedestrian-friendly and transit-oriented,**

As detailed previously, the additional built form proposed under an SGA-3 zoning can be readily absorbed on the site given its dimensions and size. The large frontage along Courtland Avenue directly opposite an LRT station provides an opportunity for a well-defined urban tower which will sit comfortably within the future development context for the MTSA, with an appropriate transition in building heights provided from the SGA-4 zoning opposite Courtland Avenue to the south-west towards the subject site. Further, the frontage allows for activation of the site at ground level and a robust landscaping plan to be considered in future designs for the sites.

- **Target Density:** Pursuant to Official Plan Policy 3.C.2.18, the minimum density envisioned for the Block Line LRT Station MTSA is 80 residents and jobs combined per hectare. The total land has an area of 17,355.79m² (1.7335 hectares) resulting in an approximate minimum density of 138.68 residents for the site. The Block Line MTSA includes large areas of SGA-1 zoned land, with an SGA-A land use designation that is characterised by fragmented single parcels containing single dwellings where it is anticipated that the majority of redevelopment will occur through infill, including missing middle housing and compatible non-residential uses. The increased density proposed for the subject site would serve to ensure that the target minimum dwellings for the MTSA can occur through comprehensive site redevelopment as future SGA-1 zoned land is amalgamated and developed in time.

Suitability of the lot for the proposed use and/or built-form

The current zoning of the subject site pursuant to Kitchener Zoning By-law 85-1 is R-9 which permits a minimum FSR of 2.0, and maximum FSR of 4.0, with no maximum height control in the zoning by-law. A range of high-density residential land uses, including *multiple dwelling* uses, are currently permissible in the zone. As such it is considered that the subject site, under its current planning controls, anticipates a higher density residential and mixed use designation that will be reduced through the proposed SGA-2 zoning for the site.



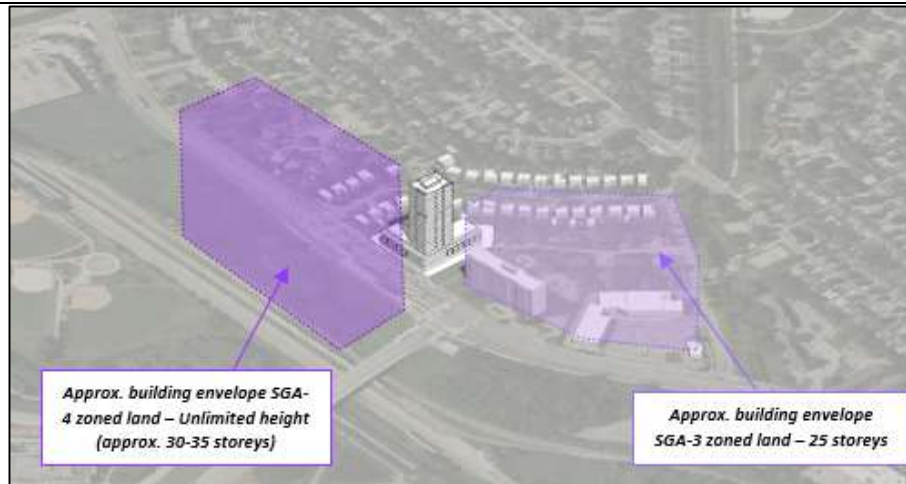
As depicted in the conceptual modelling and zone regulation assessment table at **Table 1**, the proposed built-form – up to 25-storey tower for the subject site is suitable for the site, in that:

- it has been demonstrated that the additional density can be comfortably absorbed on a lot which is over twice the area required for tower development up to 36-storeys in the SGA-3 zone,
- generous built form setbacks can be provided to the adjoining SGA-1 zone to the north of the site, including a large setback of up to 15m with no built form proposed that can contain substantial deep-soil landscaping and canopy trees serving to soften the envisioned built form at the interface with a lower-density zone, and
- as depicted in the below indicative building envelopes for the broader locality, the proposed zoning for the site provides a better visual outcome for the broader Block Line MTSA with respect to tower heights, skyline, and urban design considering the future envisioned heights for adjacent SGA-3 and SGA-4 zoned land.

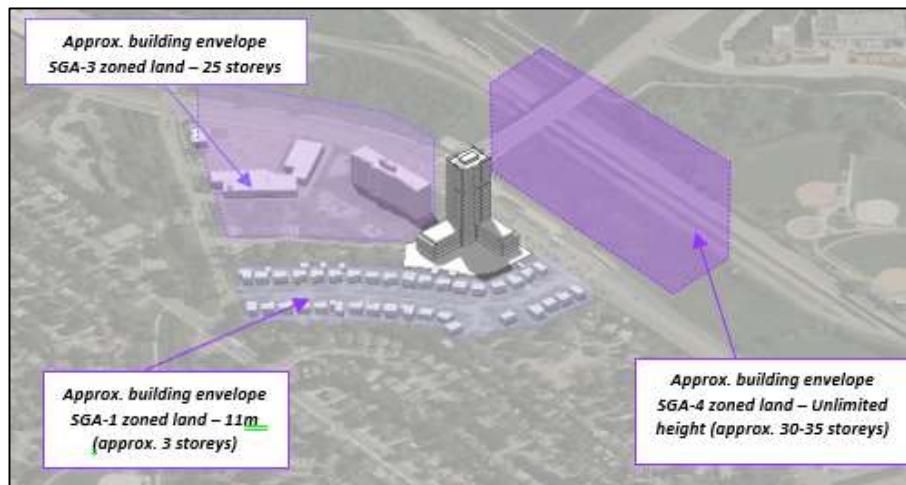
We submit that the transitional setback and height regulations for development that borders lower density zones developed by the City of Kitchener serves to adequately protect the visual amenity and future interface of the subject site and northern adjoining SGA-1 zone. The proposed zoning of the subject site can sensitively house forms of increased density under the setback and transition controls of the Draft ZBA, ensuring future built forms relate appropriately to the anticipated SGA-1 zone and existing low-density neighbourhood to the north with respect to bulk and scale, amenity impacts, and visual separation.

The proposed concept modelling for the site provides an interface of a 4-storey podium with a large, landscaped setback to the northern boundary of the site, which will be directly adjacent to the future envisioned 11m – 3 storey development as the proposed SGA-1 zone to the north is redeveloped in time. A further distribution of density across the site between the 4-storey podium and 25 storey tower could also be achieved to further ensure bulk and scale is managed at the zone interface.

The below model extract and indicative building envelopes for adjacent SGA-4 and SGA-3 zoned land depicts the future development context – approximate maximum heights in the Block Line locality, confirming the proposal is suitable for the subject site with respect to built form:



Source: Build Waterloo Region



Source: Build Waterloo Region



<i>Lot area and consolidation as further outlined in Policy 3.C.2.11</i>	<p>The subject land comprises a single ownership parcel of land with a total site area of 17,355.79m².</p> <p>The future development of the site would not require any lot consolidation. The change sought in the draft zoning for the site therefore does not contravene Policy 3.C.2.11 of the City of Kitchener Official Plan.</p>
<i>Compliance with the City's Urban Design Manual and Policy 11.C.1.34</i>	<p>In accordance with the City of Kitchener Urban Design Manual – Chapter 2 Major Transit Station Areas and Chapter 9 Tall Buildings, the concept modelling for the site is consistent with the relevant urban design provisions as follows:</p> <ul style="list-style-type: none">- Chapter 2 Major Transit Station Areas:<ul style="list-style-type: none">▪ 2.1.1 Kitchener's Major Transit Station Areas: The proposed SGA-3 zoning for the subject site serves to better achieve the vision for MTSA's by providing for more compact and dense transit-oriented development. As detailed previously, the additional density afforded to the site improves the economic feasibility of providing mixed-use development on the site by allowing for higher residential densities to off-set the cost of future commercial or community uses integrated within a Build Waterloo Region or Waterloo Region Housing development.▪ 2.2.4 Street Design: The increased density for the site allows the opportunity for a well-defined tower form directly adjacent to the Block Line LRT station, with a human-scale podium providing activation of the streetscape through non-residential uses at the ground floor. Further, the additional density allows for the use of ground floor areas of the site for new mid-block pedestrian connections from Shelley Drive to Courtland Avenue, for example, along the northern boundary of the site where vehicular access would otherwise be constrained by existing bus stop GRT Bus Stop ID 2026.▪ 2.2.6 Compatibility: The proposed higher density zoning for the subject site adjacent to the existing lower-density neighbourhood to the north provides a suitable transition in scale, massing and height as depicted in the concept modelling prepared for the subject site. The proposed concept modelling for the site provides an interface of a 4-storey podium with a large landscaped setback to the northern boundary of the site, which will be directly adjacent to the future envisioned 11m – 3 storey development as the proposed SGA-1 zone to the north is developed in time. A further distribution of density across the site between the 4-storey podium and 25-storey tower could also be achieved to further ensure bulk and scale is managed at the zone interface.▪ 2.3.1 Built Form: The concept modelling prepared for the site indicating a potential built form under an SGA-3 zoning for the site confirms an appropriate human-scaled podium of 4-storeys, with a recessed slender tower form above can be located on the site. The concept modelling concentrates the built form towards the south-western portion of the site adjacent to the Courtland Avenue frontage providing for activation of the streetscape directly opposite the LRT station.



	<ul style="list-style-type: none">▪ 2.3.3 Site Function: Vehicular access to the site is likely to be located at the southern boundary of the site vehicular access would otherwise be constrained by existing bus stop GRT Bus Stop ID 2026 at the northern boundary. This access would be consistent with the existing road opening at the south-western corner of the site.▪ 2.4.4 PARTS Block Line, Fairway & Sportsworld: The manual does not currently provide design guidelines for the Block Line MTSA. <p>- Chapter 9 Tall Buildings:</p> <ul style="list-style-type: none">▪ 9.3.3 Compatibility: This section of the manual states that the scale and transition standards envisioned for tall buildings includes a '<i>sensitively transition to surrounding urban contexts, accounting for both <u>the existing context and the planned vision for an area</u></i>'. The proposed SGA-3 zoning for the site is an acceptable contextual fit for the locality having regard to the future envisioned built forms surrounding the site within SGA-1 (3 storeys), SGA-3 (25 storeys), and SGA-4 (Approx. 35+ storeys) zones.
<i>Cultural heritage resources, including Policy 15.D.2.8</i>	The subject site is not located within a Heritage Conservation District, nor does the site contain Heritage listed or designated buildings.
<i>Technical considerations and other contextual or site specific factors</i>	<p>The surrounding site context supports the zoning of the land as SGA-3 pursuant to the following:</p> <ul style="list-style-type: none">- The site is within 130m walking distance via accessible path of travel at the pedestrian crossing at Block Line Road to the Block Line LRT station. The proximity of the site to this LRT station supports larger scales of development on the property than that permitted under SGA-2 zoning, and the additional housing densities accessed from zoning the land SGA3 will contribute- The site is adjacent to a proposed SGA-4 zone opposite Courtland Avenue East, which has previously been contemplated for 30-38 storey mixed-use tower development. An increased density for the site to permit up to 25 storeys under SGA-3 zoning would be a more appropriate planning response for the land given its level of public transit service and through-site frontage to both Courtland Avenue and Shelley Avenue.- An increased height for the site would not result in a conflict with the Waterloo Airport Zoning Regulations with respect to its 'Takeoff Approach' area.



Conclusion

We trust the above has addressed the site-specific criteria raised by the Growing Together team at the City of Kitchener with respect to the proposed SGA-C Land Use and SGA-3 zoning for the Region-owned property within the Growing Together East SGA boundaries at 1050 Courtland Avenue East, Kitchener.

Build Waterloo Region would appreciate the opportunity to discuss the above matters with City of Kitchener staff through their Growing Together initiative.

We thank you for your time and consideration.

Yours truly,

Jason Lambropoulos

Senior Development Planner, MSc Spatial Planning, BPlan
Build Waterloo Region (Region of Waterloo)

cc.

Rod Regier, Commissioner PDLS

Danielle De Fields, Director of Regional Growth, Development and Sustainability Services

Matthew Chandy, Director Build Waterloo Region

Ryan Pettipiere, Director of Housing Services

Jeffrey Schumacher, Manager Affordable Housing Development

Charlotte Hudson, Senior Real Estate Consultant

Matthew O'Neill, Manager Rapid Transit Coordination

Will Towns, Senior Planner Regional Growth, Development and Sustainability Services

Ashley Graham, Development Portfolio Manager, Build Waterloo Region

Yuri Langlois, Supervisor Urban Design, Build Waterloo Region

Josh Graham, Associate Director, Build Waterloo Region

From: [Johnston, Jeremiah \(MTO\)](#)
To: [Matthew Rodrigues](#)
Cc: [Adam Clark](#); [Elyssa Pompa](#); [Robert Keel](#); [Chris Sidlar](#); [Elisabeth Hofbauer-Spitzer](#)
Subject: RE: Growing Together East Agency Circulation
Date: Tuesday, April 1, 2025 4:40:36 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Hello Matthew,

Thank you for the notifying MTO of the City of Kitchener's - Growing Together East Plan.

Upon a review of the documents available on the City's website MTO provides the following comments.

In addition to all the applicable municipal requirements, all proposed development located adjacent to and in the vicinity of a provincial highway within MTO's permit control area under *the Public Transportation and Highway Improvement Act* (PTHIA) will also be subject to MTO approval. Early consultation with the MTO is encouraged to ensure the integration of municipal planning initiatives with provincial transportation planning. Any new areas in the City of Kitchener identified for future development that are located adjacent to or in the vicinity of a provincial highway or interchange/intersection within MTO's permit control area will be subject to MTO's permitting requirements, policies, standards, and requirements.

MTO's statutory authority for its permit control system, including highway access control is set out in Sections 31, 34 (King's Highway) and 38 (controlled-access highway) of the *Public Transportation and Highway Improvement Act* (PTHIA). Any development located within MTO's permit control area under the PTHIA is subject to MTO review and approval prior to the issuance of permits. These permits must be obtained prior to any construction being undertaken within MTO's permit control area. Any new proposed access connection (including municipal roads) or change of use of an existing access that is located at municipal crossroad and within the vicinity of a provincial highway, intersection or interchange ramp terminal must meet MTO's access management policies, practices, and principles. MTO's access management requirements can be found in MTO's Highway Corridor Management Manual.

- All existing highways, interchanges, and intersections under the jurisdiction of MTO should be accurately shown on all land use schedules and maps included in the plan. All highway routes and their numbers should be clearly visible and legible.

Municipalities that would like to construct active transportation facilities adjacent

to provincial highways, are invited to contact MTO to discuss their plans. MTO reviews cycling proposals on a case by case basis and will allow changes to take place on provincial highway structure only after an analysis of the impact on safety and traffic operations is accepted.

MTO Owned Lands – MTO owns lands at the Sportsworld Drive interchange which are currently used as a carpool lot, municipally addressed as 65 SPORTSWORLD CROSSING RD. In the future, the interchange will be reconfigured. On the current Draft Land Use and Zoning maps, the MTO lands are included. MTO would prefer that the designation and zoning are not applied to these lands.

MTO requests that the City undertake a traffic impact assessment. The study would determine whether the existing provincial highways and interchanges within the City of Kitchener can adequately accommodate the planned anticipated growth (of the Growing Together East study), identify warranted improvements associated with land use development, and make recommendations should improvements be required. It is in the mutual interest of the City and MTO to discuss the implications of any future development plans upon the provincial highway network and develop a mutually acceptable strategy to administer them. If highway improvements are required to accommodate the growth, arrangements for administration, construction and financing should be discussed early with MTO to avoid delays.

MTO notes that a Transportation Analysis Study was completed. The report was prepared without consultation with MTO. MTO requires a Terms of Reference be submitted for review and approval prior to revising the report. MTO provides the following cursory comments on the 'Growing Together East-Transportation Analysis Study' by Lea Transportation;

- Pg 18 - The report does not consider the Highway 7/8 and Courtland Ave E north ramp terminal, only the south terminal is mentioned.
- Pg 27 - The report does not mention the Button Hook off / on ramp from Highway 8 to King Street East.
- Pg 38 - The report does not mention that the Highway 8 and Sportsworld Drive interchange is within the study area.
- Pg 38 - The report mentions that there are 8 through lanes on Highway 8. At the Sportsworld Drive interchange there are 4 through lanes.
- Throughout the documents, the current interchange configuration of Highway 8 and Sportsworld Drive. Based on the time horizons, it should be updated to show planned MTO changes at this location.
- Pg 76 - For the traffic analysis, the signalized intersection of Sportsworld Drive and Gateway Park Drive was analyzed but was not shown on drawings as to its

LOS.

Should you have any questions about these comments, please direct them to me by email.

Thank you,

Jeremiah Johnston

Corridor Management Planner | Highway Operations Branch
Ministry of Transportation | Ontario Public Service

[REDACTED]



Taking pride in strengthening Ontario, its places and its people

From: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>

Sent: Monday, March 3, 2025 7:58 AM

To: Johnston, Jeremiah (MTO) [REDACTED]

Cc: Adam Clark <Adam.Clark@kitchener.ca>; Elyssa Pompa <Elyssa.Pompa@kitchener.ca>, [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Growing Together East Agency Circulation

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good morning Jeremiah,

Thank you for the update on MTO's review of the documents. Would you be able to provide comments by March 10, as we are working towards an April meeting of Council to consider the various amendments? If not, please let me know when you are expecting to provide comments.

Please let me know. Thanks,

Matt.

Matthew Rodrigues (he/him), MCIP, RPP

Senior Planner | Planning and Housing Policy Division | City of Kitchener
519-783-8946 | TTY 1-866-969-9994 | Matthew.Rodrigues@kitchener.ca

From: Johnston, Jeremiah (MTO) <Jeremiah.Johnston@ontario.ca>

Sent: Friday, February 28, 2025 4:09:01 PM

To: Christine Kompter <Christine.Kompter@kitchener.ca>; Growing Together (SM) <GrowingTogether@kitchener.ca>
Subject: RE: Growing Together East Agency Circulation

Hello Christine,

MTO is reviewing the documents that have been circulated and will provide comments at a later date.

Thank you,

Jeremiah Johnston

Corridor Management Planner | Highway Operations Branch
Ministry of Transportation | Ontario Public Service

[Redacted]



Taking pride in strengthening Ontario, its places and its people

[Redacted]

Cc: Matthew Rodrigues <Matthew.Rodrigues@kitchener.ca>; Elyssa Pompa <Elyssa.Pompa@kitchener.ca>; Adam Clark <Adam.Clark@kitchener.ca>
Subject: Growing Together East Agency Circulation

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Further to the project initiation notice dated July 19, 2024, the City of Kitchener has released updated land use and zoning mapping and a new “Land Use and Zoning Brief”, which will provide direction for a forthcoming city-initiated Official Plan Amendment and Zoning By-law Amendment as part of the Growing Together East project. Your comments are requested by February 28, 2025. All materials can be found here:

<https://www.engagewr.ca/growingtogether>.

A public open house will be held on Feb. 26 from 4-7p.m. and availability for one-on-one landowner meetings has been made available.

If you have any questions, please contact growingtogether@kitchener.ca.

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