



PLANNING, DEVELOPMENT &
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December 23, 2025

Evan Wittman
Senior Planner
City of Kitchener
200 King Street West, 6th Floor
P.O. Box 1118, Kitchener, ON
N2G 4G7

Dear Mr. Wittman,

**Re: Updated Regional comments
Zoning By-law Amendment
ZBA25/026/W/EW
7 Wimbleton Crescent
BDRP Inc. c/o Up Consulting Ltd.
City of Kitchener**

Regional staff have received a zoning by-law amendment (ZBA) application pertaining to lands at 7 Wimbleton Crescent in the City of Kitchener. The applicant proposes to demolish an existing fire-damaged duplex and redevelop the property with a side-split semi-detached dwelling that includes secondary (one-bedroom basement) units on each side. Four units in total are proposed with four parking spaces provided, inclusive of garage space.

The subject lands are located in the Urban Area and Delineated Built Up Area in the Regional Official Plan (ROP); designated Low Rise Residential in the City's Official Plan; and zoned Low Rise Residential Two (RES-2). The ZBA seeks to amend the zoning from RES-2 to RES-4 to permit the semi-detached built form in absence of any site-specific provisions.

Regional staff provided comments on the related pre-submission application in April 2025, and initial comments (exclusive of comments related to water servicing) related to ZBA25/026/W/EW on November 17, 2025. The following updated comments are provided for consideration by the City and applicant.

Water & Wastewater Services

The Region is in the process of updating its Water Supply Strategy. Through this work, concerns have been identified regarding water servicing capacity within the Mannheim

Service Area, in which the subject lands are located. Regional staff are working expeditiously to evaluate the situation and understand the magnitude of the concerns to be able to provide comments relating to water servicing capacity.

As such, the Region is not in a position to support approval of this application at this time, and the comments provided in the following sections are for information purposes.

Hydrogeology and Source Water Protection

The subject lands are located in a Wellhead Protection Sensitivity Area (WPSA) as denoted on Map 6 of the ROP, and within a source protection area identified in the Clean Water Act 2006 and 2025 Grand River Source Protection Plan, but not within an area where a Risk Management Plan or prohibition policies implemented by the Region apply. A Notice of Source Protection Plan Compliance (Section 59 Notice) is not required for this application.

In accordance with the Region's Council-endorsed position on geothermal energy, vertical closed-loop geothermal energy systems are prohibited at this location. At pre-submission, it was indicated that vertical open-loop systems may be permitted subject to the Region's acceptance of a satisfactory hydrogeological study assessing risk to nearby municipal drinking water supply wells as part of a complete ZBA application.

As no hydrogeological study has been submitted with this application, Regional staff request that the prohibition on open-loop geothermal energy systems be written into the amending zoning by-law for the subject property alongside the vertical closed-loop prohibition. Please note that shallow horizontal geothermal design is permitted at this location.

Required wording for the prohibition is as follows:

Geothermal wells are prohibited on-site. A geothermal well is defined as a vertical well, borehole or pipe installation used for geothermal systems, ground-source heat pump systems, geo-exchange systems or earth energy systems for heating or cooling; including open-loop and closed-loop vertical borehole systems. A geothermal well does not include a horizontal system where construction or excavation occurs to depths less than five meters unless the protective geologic layers overlaying a vulnerable aquifer have been removed through construction or excavation.

Grand River Transit (GRT) – Advisory

The subject property is well-served by transit. GRT Route 204 operates nearby on Lackner Boulevard (Regional Road No. 54), with bi-directional stops located 230-240 metres from the subject lands. GRT has no transit requirements associated with this application.

Waste Management (Collections) – Advisory

Regional staff have reviewed the proposal in relation to waste collection services delivered by the Region. As the semi-detached structure is proposed to have two driveways and contains fewer than six residential units, all new dwelling units

referenced in this application would be eligible to receive curbside waste collection provided by the Region.

Should the applicant have further questions about the eligibility of these proposed properties, please feel free to reach out to Regional Waste Coordinator Phil Barakoski at pbarakoski@regionofwaterloo.ca.

Environmental Threats – Advisory

For the City's awareness, the Region's Threats Inventory Database identifies no potential threats of contamination on or adjacent to the subject lands associated with documented land uses on the site.

Fees

In accordance with Regional Fees By-law 24-052, Regional staff acknowledge receipt of the required \$3,000 ZBA review fee from the applicant (received October 27, 2025). No additional fees are required.

Conclusions & Next Steps

As per the foregoing, the Region requests that City of Kitchener Council does not consider the proposed application at this time. Additional information related to servicing capacity will be provided as soon as possible.

Please be advised that any future development on the lands subject to the above-noted application will be subject to the provisions of Regional Development Charge By-law 19-037 or any successor thereof.

Please accept this letter as our request for a copy of the decision pertaining to this application when one is made. Should you have any questions, do not hesitate to contact the undersigned.

Yours truly,



Will Towns, MCIP, RPP
Senior Planner

Cc: Christopher Haliburton, BDRP Inc. (Owner)
David Galbraith, Up Consulting Ltd. (Applicant)