



PLANNING, DEVELOPMENT
AND LEGISLATIVE SERVICES
Community Planning
150 Frederick Street 8th Floor
Kitchener Ontario N2G 4J3 Canada
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Shilling Yip (226) 753-1064 (cell)
File: C14-60/25028

February 12, 2026

Eric Schneider, MCIP, RPP
Senior Planner
City of Kitchener
City Hall, P.O. Box 1118
200 King St. West
Kitchener, ON N2G 4G7

Dear Mr. Schneider:

**Re: Updated Comments – Water Capacity
Proposed ZBA 25/028/N/ES
(Harvest Park / Plan of Subdivision 30T-08203, Stage 6)
Activa Holdings Inc.
1388 New Dundee Road
CITY OF KITCHENER**

Further to the Region's comments dated December 23, 2025 the Region has further reviewed the application to permit a technical change to the Zoning Bylaw that allows townhouse units to be constructed in blocks of 6 as opposed to blocks of 4, as currently permitted in the existing RES-4 zoning. Region staff understand that this proposal does not increase the overall number of units contemplated through the Region's Servicing Agreement and registrations of Stages 4 -7 and Region staff has no objection to this application.

Please be advised that the Region continues not to support approval of ZBA application 25/005/N/ES (related application) at this time, is not currently entering into new servicing agreements, and are reviewing Form 1s on a case-by-case basis.

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

Yours truly,

A handwritten signature in blue ink that reads "Shilling Yip".

Shilling Yip, MCIP, RPP
Senior Planner

cc. Pierre Chauvin, MHBC Planning (Kitchener)



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December 23, 2025

Eric Schneider, MCIP, RPP
Senior Planner
City of Kitchener
City Hall, P.O. Box 1118
200 King St. West
Kitchener, ON N2G 4G7

Dear Mr. Schneider:

**Re: Proposed ZBA 25/028/N/ES
(Harvest Park / Plan of Subdivision 30T-08203, Stage 6)
Activa Holdings Inc.
1388 New Dundee Road
CITY OF KITCHENER**

The Region has reviewed the above-noted application and provide the following comments for your consideration. The purpose of these comments is to identify matters pertaining to the Region's responsibilities that impact the proposal, and how they may be addressed through these applications.

The application applies to 3 parcels of land within Stage 6 of the Stauffer Woods/Harvest Park subdivision 30T-08203 located at Blair Creek Drive/Blair Valley Street, which was registered as 58M-672 on May 28, 2021. These lands formed part of a previous and on-going development application (ZBA 25/005/N/ES), and these specific Blocks have been formally withdrawn from the earlier application in order to bring this housing product to market much sooner. The Region provided comments on the this earlier application in letters dated April 23, 2025 and July 10, 2025.

The proposal seeks to add site specific provisions to the Zoning By-law to allow for blocks of 6 street townhouses rather than a maximum of 4 and to establish a minimum external unit lot width of 8.1 metres. The requests specifically apply to 3 lotless blocks referred to as Blocks 1, 2 and 3 of Plan 58M-672.

Water and 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. 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 following comments are provided for information purposes:

Hydrogeology and Water Programs

Regional staff has no comments on the requested change to number of townhouses. The Region's comments on the original application dated April 23, 2025 indicated a Salt Management Plan (SMP) will be required at Site Plan Control for each block proposing private roads or paved areas greater or equal to 200m² and that this requirement for SMPs at site plan has been secured in a Regional agreement for the subject Blocks. No further action is required as part of the subject ZBA application.

Section 59 Notice

The property at 1388 New Dundee Rd, Kitchener is not in a source protection area under the 2025 Grand River Source Protection Plan. A Notice of Source Protection Plan Compliance (Section 59 Notice) is not required.

Waste Management

From a waste management perspective, if classified as separate residentially-zoned and occupied properties, all residential properties with 6 or fewer units referenced in this application would all be eligible to receive curbside waste collection provided by the Region of Waterloo. Each residential property will be able to participate independently from the other as long as each property has a driveway that faces onto a municipally maintained roadway. For any private condominium sites in this area, these sites will be required to be assessed independently once plans for those properties are available. It is up to Regional staff discretion to formally activate properties onto the residential curbside collection program. The region will activate properties once a particular street has been completed and assumed by the municipality responsible, construction and occupancy have been completed, and a sufficient turnaround or drive-through access has been provided. Collection trucks are prohibited from reversing and must maintain a forward-moving direction at all times. Until streets can be activated for Regional waste services, the home builder is responsible for all residentially generated waste and must provide an option to residents to dispose of their waste.

Additionally, the Region of Waterloo is no longer responsible for the collection of recyclable material. Should you want to learn if this property is eligible for recycling collection, you need to contact the current program administrator, Miller Waste Systems,

regarding any plan for a separate recycling collection scheme at this property. The applicant can contact Miller Waste directly at:

area22@millerwaste.ca

1-888-852-3450

If there are any further questions about the eligibility of these proposed properties, please feel free to reach out to Waste Coordinator Phil Barakoski pbarakoski@regionofwaterloo.ca.

Corridor Development

Corridor Development has reviewed the subject application and has no comments

Housing

The Region of Waterloo, as the Service System Manager for housing, is required by legislation to create a plan to address affordable housing and homelessness every 10 years for the geography which it covers. The plans are to outline current housing needs, develop objectives and targets related to meeting housing needs, and commit to actions that will be taken to meet these targets.

Within this role, the Region of Waterloo establishes, administers, and funds housing and homelessness programs and services and operates housing directly.

- 10-Year Housing and Homelessness Plan for Waterloo Region contains an affordable housing target which is that 30% of all new residential development between 2019 and 2041 in Waterloo Region be affordable to low and moderate income households.
- Our Building Better Futures Framework shows how the Region plans to create 3,500 units of housing affordable to people with low to moderate incomes by 2029.

The Region supports the provision of affordable housing. Should this development application move forward, and all necessary amendments be approved, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Provincial Planning Statement. Rent levels and house prices that are considered affordable according to the Provincial Planning Statement are provided below in the section on affordability. These are the levels and prices for which developments will be considered for Regional Development Charge exemptions.

For affordable housing to fulfill its purpose of being affordable to those who require rents or purchase prices lower than the regular market provides, a mechanism should be in place to ensure the units remain affordable and establish income levels of the households who can rent or own the homes.

Staff further recommend meeting with Housing Services to discuss the proposal in more detail and to explore opportunities for partnerships or programs and mechanisms to support a defined level of affordability.

Affordability in Kitchener

According to the Provincial Planning Statement 2024, the affordable house price is the lesser of the two house prices calculated as below:

- the price that is 10% below the average purchase price of a resale market unit; and
- the price of a home for which payments would not exceed 30% of gross annual household income at the 60th percentile.

For an ownership unit of any dwelling type (i.e. single, semi, towns, apartment) to be deemed affordable, the proposed house price in the City of Kitchener must be at or below \$377,700. (Source: Provincial Bulletin posted August 2025)

According to the Provincial Planning Statement 2024, the affordable rent is the lesser of the two rent values calculated as below:

- average market rent provided annually by the Canada Mortgage and Housing Corporation
- rent which would not exceed 30% of gross annual renter household income at the 60th percentile.

For a rental unit to be deemed affordable, the rent for the proposed units in the City of Kitchener must be at or below:

- Studio \$1,210
 - One Bedroom: \$1,382
 - Two Bedroom: \$1,674
 - Three+ Bedroom: \$1,890
- (Source: Provincial Bulletin posted _August 2025)

Please do not hesitate to contact Tristan Wilkin, Supervisor, Affordable Housing Development directly by email at TWilkin@regionofwaterloo.ca or by phone at 226-753-9723 should you have any questions or wish to discuss in more detail.

Other

The applicant has submitted the Region's planning review fee for this application, received November 17, 2025.

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

Yours truly,



Shilling Yip, MCIP, RPP
Senior Planner

cc. Pierre Chauvin, MHBC Planning (Kitchener)

City of Kitchener

Zoning By-law Amendment comments

Application type: Zoning By-law Amendment Application ZBA25/028/B/ES

Comments of: Transportation

Commenter's name: Dave Seller

Email: Dave.Seller@kitchener.ca

Phone: (519) 783-8152

Comments due: December 31, 2025

Project address: Blair Creek Drive & Blair Valley Street
(Stauffer Woods Stage 6 30T-08203 ZBA)

Preamble

The applicant proposes site-specific amendments to the Zoning By-law to permit blocks of six street townhouse units, exceeding the current maximum of four units per block. In addition, the amendment seeks to establish a minimum external unit lot width of 8.1 metres on three lotless blocks, identified as Blocks 1, 2 and 3.

Conclusions

Transportation Services have reviewed the proposed ZBA for Stage 6 and offer the following comments.

- No concerns with the proposed unit increase from 4 to 6 units for Blocks 1, 2 and 3.
- The concrete sidewalks within the municipal right-of-way should be specified as 1.8 metres in width, as the current drawing indicates a width of 1.5 metres.
- The on-street parking plan and site statistics that was submitted in June 2025 as part of the fourth submission for Stage 6 be updated and re-submitted for comments. Below is a screen capture from the fourth submission.



Approval Stamp	Date: June 5, 2025
	Drawn By: CAC
	Plan Scale: 1 : 500
	File No.: 8784AG
	Checked By: P.C.
	Other:

Project	
Harvest Park Subdivision Activa Group Inc 55 Columbia Street East, Suite 1 Waterloo, ON, N2J 4N7 P: 519 886 9400 F: 519 886 8965 www.activagroup.ca	
File Name	Dwg No.
PARKING PLAN - STAGE 6	1 of 1

Site Statistics - 30T-08203, Stage 6

Number of Lots:	67
On-Street Parking Required:	34
On-Street Parking Provided:	36

K:\254AG-Active-Use-Rev-Of-Parking_Plan\18203-Park - Stage 6\Planning\Rev-Stage6_51Jun2025.dwg

Good afternoon,

The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comments/conditions:

1. That any Education Development Charges shall be collected prior to the issuance of a building permit(s).

Thank you.

Kind regards,

Isabelle Lung Ler | Planning Technician

P 519-578-3677 x 2355 | wcdsb.ca



**Waterloo Catholic
District School Board**
Quality, Inclusive, Faith Based Education

I looked at the zone change application and compared it to the approved engineering plans. It looks like they already accounted for the blocks of 6 (as opposed to blocks of 4) townhouses in the engineering review and approved plans. So Engineering has no comments.

Sincerely,

Katie Wood, C.E.T.

Project Manager | Development Engineering | Engineering Division | City of Kitchener
519-783-8902 | TTY 1-866-969-9994 | katie.wood@kitchener.ca



Hello Eric,

Env planning has no comment regarding the proposed ZBA for the tree townhouse blocks in Stauffer Woods Stage 6.

Warmest regards,

Carrie Musselman, BSc., Dip., MCIP, RPP

Hi Eric,

Given this is a minor adjustment in townhouse layout / density in the approved blocks, GRCA has no concerns with the application.

Regards,

Trevor Heywood B.Sc.(Env.)

Resource Planner

Grand River Conservation Authority

400 Clyde Road, PO Box 729

Cambridge, ON N1R 5W6

Phone: 519-621-2761 ext. 2292

Email: theywood@grandriver.ca

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

Treaty Rights Accommodation and Compensation

Further development of the land infringes on Six Nations Aboriginal and Treaty Rights by essentially guaranteeing land will not be returned to a natural state and by negatively impacting the environment through emissions and use of resources. Developments on this land fall under the Duty to Consult and Accommodate, meaning Six Nations of the Grand River must be consulted with and accommodated for impacts to their rights.

SNGREC requires that this development is paired with compensation for impacts to these rights and to the environment. Compensation should include environmental enhancement, financial compensation, and other forms of compensation such as increased numbers of affordable units and discounts for Six Nations people. Please contact lrust@sixnations.ca to schedule a meeting to collaborate on determining compensation.

Landscaping

SNGREC requires that native plant species are prioritized in landscaping efforts, and that invasive or potentially invasive species are completely avoided. Non-native species are less ecologically beneficial, and some non-native species can become invasive even after decades of seeming fine. SNGREC requires an opportunity to review any landscape plant lists before procurement begins. SNGREC requests that the proponent uses Kayanase Plant Nursery for procurement of plants if Kayanase's capacity allows.

SNGREC requests that the proponent commits to these actions during this phase of the application.

Bird and Light Friendly Design

SNGREC requests that the buildings and streetscapes are designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, and using warmer lights that are directed downwards and away from natural areas.

Please see the City of Toronto's bird friendly practices for glass and for lighting as guidelines and implement them thoroughly across the entire design:

<https://www.toronto.ca/wp-content/uploads/2017/08/8d1c-Bird-Friendly-Best-Practices-Glass.pdf>

<https://www.toronto.ca/wp-content/uploads/2018/03/8ff6-city-planning-bird-effective-lighting.pdf>

SNGREC requests commitment at this stage of development to explore and implement thorough bird and light friendly practices during the appropriate phases.

It is not just high-rise buildings that result in birds dying due to window collisions, as an estimated 90% of bird-window collision deaths occur on home windows (Machtans et al., 2013). This becomes especially important for the proposed glass balconies which look like a passage for birds.

Machtans et al. (2013). A First Estimate for Canada of the Number of Birds Killed by Colliding with Building Windows. Avian Conservation and Ecology. 8. 6. 10.5751/ACE-00568-080206. Retrieved from https://www.researchgate.net/publication/260163261_A_First_Estimate_for_Canada_of_the_Number_of_Birds_Killed_by_Colliding_with_Building_Windows

Niá:wen (thank you),

**Emmett Vanson, BSc., Grad. Cert. (he/him)
Land Use and Stewardship Technician**

**Six Nations of the Grand River Elected Council - Lands and Resources
Department - Consultation and Accommodation Process Team**

lrlust@sixnations.ca



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