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June 17, 2025

Lindsay Clark  
Ministry of Municipal Affairs and Housing  
Municipal Services Office - Western Ontario  
659 Exeter Road, Floor 2  
London, ON N6E 1L3

Dear Ms. Clark:

**RE: Approval to Amend a Municipality's Official Plan (OPA 58)/ ERO Number: 025-0203  
/ Ministry Reference Number 30-OP-252866  
OUR FILE 15202B**

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We are writing on behalf of our client, Vanmar Developments 171 King GP Corp, owner of lands located at 167-171 King Street South, Waterloo (referred to herein as the "subject lands"). The subject lands are located within a Protected Major Transit Station Area (PMTSA) and were purchased with the intention of redeveloping the lands with high density residential development. **We are actively working on completion of technical reports in support of planning applications for these lands.**

Our client participated in the City's Official Plan review process, including the submission of formal comments, in response to both the initial draft OPA and the 2<sup>nd</sup> draft OPA. Our letters confirmed our client's support of the City's proposed removal of prescribed maximum densities that would encumber prime intensification sites like the subject lands. Our letters also supported the City's proposal to increase height permissions within its PMTSA areas. However, in our client's opinion, the proposed increase from 25 to 30 storeys did not go far enough when considering recent approvals, current applications within the Region (many of which far exceed 30 storeys), and our client's development proposal for the subject lands.

In consultation with City staff, our client agreed to a deferral of OPA 58 as it relates to the subject lands in order to further review our comments with City planning staff. This included review of the Pre-Consultation Application for the subject lands, which was submitted prior to Council consideration of OPA 58. Since the December 2024 Council approval of OPA 58, we have been working closely with City of Waterloo Planning Staff and have arrived at a potential site-specific policy resolution that is scheduled to come before City Council on July 14, 2025 (the "Proposed Resolution"). The Proposed Resolution is attached.

The site plan concept for the subject lands has been updated to conform to the height permissions recommended by City staff in the deferral resolution. This has resulted in a 20% increase in housing units (approximately 140 more units) when compared to the unit yield for the 30 storeys that was originally proposed through OPA 58. **In total approximately 834 units are proposed through a site-specific zone change amendment that our client will be submitting immediately following the July Council decision on the deferral.**

If the Proposed Resolution is accepted by City Council, it will better position the subject lands to deliver housing in the near future. However, should OPA 58 be approved by the Minister per ERO posting 025-0203 without the Proposed Resolution a site-specific OPA will be required to implement the Proposed Resolution. This will delay planning policy certainty on the subject lands and thus potentially delay future housing development.

**We are writing to respectfully request that the Proposed Resolution, if endorsed by City of Waterloo Council for the subject lands, be incorporated as part of OPA 58 and implemented as part of the Minister's forthcoming decision. This is the preferred approach of both the City and our client. Incorporating an agreed upon policy resolution for the subject lands, should one be approved by Council in July, as part of OPA 58 will provide for certainty in terms of permitted height and density on the subject lands, which in turn provides our client with the confidence to submit planning applications in order to deliver needed housing within Waterloo. It would also avoid a time-consuming and costly follow-up site-specific OPA process without causing undue delay to the Minister's Decision respecting OPA 58.**

Thank you for your consideration.

Yours truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'Andrea Sinclair', with a long horizontal flourish extending to the right.

Andrea Sinclair, BES, MUDS, MCIP, RPP cc.

Vanmar Developments 171 King GP Corp.

Attach.



April 14, 2025

Dear Ms. Sinclair:

**RE: Deferral of 167 and 171 King Street South from Official Plan Review**

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City Planning staff have reviewed the deferral request for 167 and 171 King Street South (the "Subject Site"). City staff are preparing to recommend to Council that the subject site receive an Area Specific Policy (ASP). The draft text of the ASP reads as follows:

**Area Specific Policy XX (167 and 171 King Street South)**

- 1) The policies of this Area Specific Policy apply to lands known municipally as 167 and 171 King Street South, shown as ASP XX.
- 2) In addition to all other applicable policies in this Plan, and notwithstanding the maximum height permitted within the 'High Rise Residential' designation, the maximum height of any building on the Lands may be up to 38 storeys, and the average height of all buildings on the Lands shall be no greater than 35 storeys.
- 3) Notwithstanding anything to the contrary in this Plan, residential uses shall be permitted on the ground floor on the Caroline Street South frontage.
- 4) Matters relating to appropriate built form standards density, transition and buffering from adjacent lands shall be regulated by the implementing Zoning By-law.

City staff are available to discuss the details of the ASP prior to presenting our recommendation to Council. Please reach out to Adam Zufferli to schedule a meeting.

Sincerely,

Adam Lauder

Manager of Community Planning

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Cc: Paul Leveck