



**STAFF REPORT
Planning**

Title: Zoning By-law Amendment Z-20-03, 145 Columbia (Waterloo) Corp.,
145 Columbia Street West
Report Number: IPPW2021-012
Author: Joel Cotter
Meeting Type: Council Meeting
Council/Committee Date: February 8, 2021
File: Z-20-03
Attachments: Appendix A – Minutes of Informal Public Meeting
Appendix B – Agency / Staff / Public Comments
Appendix C – Rendering
Ward No.: 6-Central-Columbia Ward

Recommendations:

1. That Council approve IPPW2021-012.
2. That Council approve Zoning By-law Amendment Z-20-03, 145 Columbia (Waterloo) Corp., 145 Columbia Street West, in accordance with Section 7 of IPPW2021-012.
3. That the Mayor and Clerk be authorized to sign an amending agreement to the Section 37 Planning Act Agreement applied to 145 Columbia Street West, Zoning By-law Amendment Z-20-03, in accordance with Recommendation B.iii.) in Section 7 of IPPW2021-012, the form and content of which shall be to the satisfaction of the City Solicitor.

A. Executive Summary

The Lands known municipally as 145 Columbia Street West are zoned Residential Northdale 25 (RN-25) with site specific provisions in Exemption 203 (C203) in Zoning By-law 2018-050. Exemption C203 permits two residential towers on the Lands with heights of 15 storeys (47m) and 20 storeys (61.5m). Zoning By-law Amendment Z-20-03 proposes to:

- i. increase the tower heights to 20 storeys (61.5m) and 23 storeys (70.5m) respectively;
- ii. amend the parking provision applied to the Lands.

B. Financial Implications

None. Should the application be appealed, potential costs related to a Local Planning Appeal Tribunal (LPAT) hearing may be incurred.

C. Technology Implications

None.

D. Link to Strategic Plan

(Strategic Pillars: Equity, Inclusion and a Sense of Belonging; Sustainability and the Environment; Safe, Sustainable Transportation; Healthy Community & Resilient Neighbourhoods; Infrastructure Renewal; Economic Growth & Development)

(Guiding Principles: Equity and Inclusion; Sustainability; Fiscal Responsibility; Healthy and Safe Workplace; Effective Engagement; Personal Leadership; Service Excellence)

Economic Growth & Development – intensification of lands planned for high density development.

E. Previous Reports on this Topic

DS2013-004

IPPW2018-024

F. Approvals

| Name | Signature | Date |
|-----------------------------------|------------------|-------------|
| Author: Joel Cotter | | |
| Director: Joel Cotter | | |
| Commissioner: Cameron Rapp | | |
| Finance: N/A | | |

CAO



**Zoning By-law Amendment Z-20-03, 145 Columbia (Waterloo) Corp.,
145 Columbia Street West
IPPW2021-012**

SECTION 1 – SUBJECT LANDS

Location

145 Columbia Street West

Ward

Central-Columbia (Ward 6)

Lot Area

0.46 hectares

Land Owner / Applicant

145 Columbia (Waterloo) Corp.

Existing Land Use

Apartment Building
(under construction)

Proposed Development

Apartment Building

Informal Public Meeting

Minutes of the Informal Public Meeting are attached as Appendix 'A'.

Context

The Lands are:

- located on the south side of Columbia Street West, east of Phillip Street (see inset map)
- within the Northdale neighbourhood
- tied to 330 Phillip Street, also developed by the Applicant and known as ICON



LOCATION MAP

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Columbia Street is a City arterial road. Transit services are provided on Columbia Street. Two ION Stations exist within 750 metres of the Lands.

The proposed development at 145 Columbia St W is Phase 2 of an integrated high-rise development project. Phase 1 (330 Phillip St – inset image) is developed and contains a 25 storey two-tower mixed-use building containing 624 residential units (866 bedrooms) and 1,000 square metres of commercial space on the ground floor fronting Phillip Street.



Phase 1 and Phase 2 are separate parcels of land, but tied through reciprocal easements for shared services, infrastructure, and access.

SECTION 2 – PROPOSED DEVELOPMENT

A building permit has been issued for a mixed-use high-rise building on the Lands (145 Columbia St W) containing 435 residential units (445 bedrooms) and 162 square metres of commercial space on the ground floor fronting Columbia Street. The building consists of two towers connected by a 6 storey podium above at-grade parking. Underground parking is accessed from 330 Phillip Street.



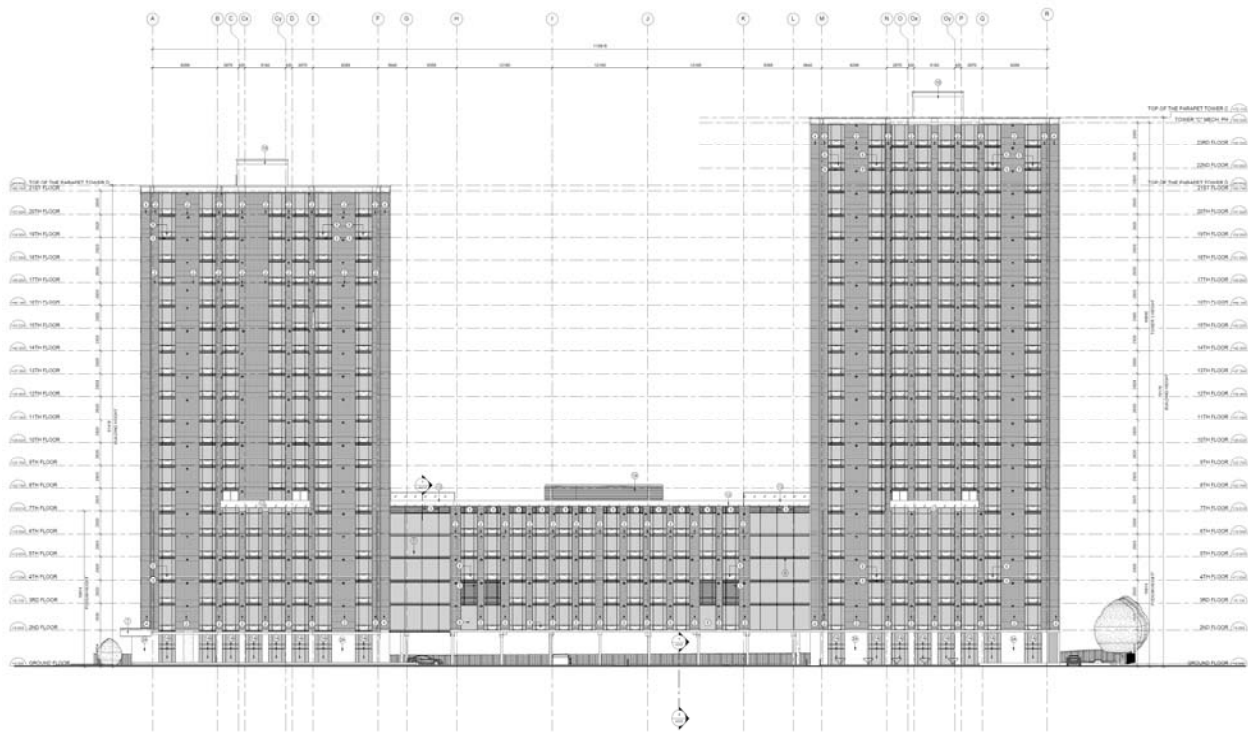
The northerly tower (Tower D) has an approved height of 15 storeys (47m). The southerly tower (Tower C) has an approved height of 20 storeys (61.5m). These building heights were secured through minor variance application A-32/19. Zoning By-law Amendment Z-20-03 seeks to increase the height of the towers to 20 storeys (61.5m) and 23 storeys (70.5m) respectively, to more efficiently use the lands by adding 100 additional residential units to the development:

| | | | |
|--------------|--------------------------------|-----------------------------|-----------------------|
| Phase 1 | 624 residential units | 866 bedrooms | 1.037 hectares |
| Phase 2 | 435 residential units | 445 bedrooms | 0.465 hectares |
| Z-20-03 | 100 residential units | 100 bedrooms | |
| TOTAL | 1,159 residential units | 1,411 bedrooms | 1.502 hectares |
| | | 940 bedrooms/hectare | |

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Exemption C203 in Zoning By-law 2018-050 sets a maximum density of 940 bedrooms per hectare for the combined lands, subject to the provision of community benefits in accordance with Section 37 of the Planning Act. Zoning By-law Amendment Z-20-03 seeks increased tower heights to maximize the density permitted on the Lands.

Elevation: Proposed Development – 145 Columbia St W (west façade)



SECTION 3 – APPLICATION DETAILS

Zoning By-law Amendment Z-20-03 seeks to amend Exemption C203 in Zoning By-law 2018-050 as follows:

- i. increase the permitted height of the northerly tower (Tower D) from 15 storeys (47m) to 20 storeys (61.5m);
- ii. increase the permitted height of the southerly tower (Tower C) from 20 storeys (61.5m) to 23 storeys (70.5m);
- iii. reduce the residential parking requirement from 0.20 spaces per bedroom to 0.175 spaces per bedroom.

The increased tower heights will allow for an additional 100 residential units (all one-bedroom units), so the maximum density of 940 bedrooms/hectare can be achieved.

In 2013, Council passed By-law 2013-028 to implement Zone Change Application Z-12-05, establishing a residential parking rate of 0.25 spaces per bedroom, the same rate applied to residential development in Northdale (re: 0.20 spaces per bedroom + 0.05 visitor spaces per bedroom). At that time, the intention was to merge 330 Phillip Street and 145 Columbia Street West, creating one parcel. Now, the intention is to retain 330 Phillip Street and 145 Columbia Street West as separate parcels, tied through reciprocal easements. Subsection 6.1.6.1 of Zoning By-law 2018-050 states: *Parking requirements shall be satisfied on the same lot as the related use, building or structure.*

While the total parking requirement of 390 spaces can be achieved on the combined lands, the parking requirement on 145 Columbia Street West cannot be satisfied without reliance on 330 Phillip Street. Through Zoning By-law Amendment Z-20-03, it is recommended that the parking rate applied to 145 Columbia Street West be reduced from 0.20 spaces per bedroom to 0.175 spaces per bedroom resulting in a parking requirement of 96 spaces for 545 bedrooms, with 98 spaces being provided:

| | | Required | Provided |
|------------------------------|-------------|-------------------|-------------------|
| Phase 1 (330 Phillip Street) | Residential | 174 | 174 |
| | Visitor | 44 | 45 |
| | Commercial | 30 | 40 |
| Phase 2 (145 Columbia St W) | Residential | 109 | 98 |
| | Visitor | 28 | 28 |
| | Commercial | 5 | 5 |
| TOTAL | | 390 spaces | 390 spaces |

SECTION 4 – POLICY EVALUATION

4.1 Provincial Policy Statement

The 2020 Provincial Policy Statement directs growth to existing settlement areas, promotes the efficient use of lands, promotes the effective use of services, and supports densities that provide for a more compact urban form.

The application is consistent with the Provincial Policy Statement, in staff’s opinion.

4.2 Growth Plan for the Greater Golden Horseshoe

The 2019 Growth Plan for the Greater Golden Horseshoe supports the achievement of complete communities, directs growth to the built-up area, prioritizes intensification and higher densities to accommodate population growth, encourages transit-supportive development, and contemplates compact built form and vibrant public realms.

The application conforms to the Growth Plan, in staff's opinion.

4.3 Region of Waterloo Official Plan

The Regional Official Plan (ROP) provides a land use planning policy framework that implements the Provincial Policy Statement and Growth Plan in the regional context. The Lands are located within the Urban Area and designated Built-Up Area on Map 3A of the ROP. The ROP contemplates intensification in a compact urban form that has regard for the planned physical character of the area and is transit-supportive.

The application conforms to the Regional Official Plan, in staff's opinion.

4.4 City of Waterloo Official Plan

The City of Waterloo Official Plan designates the lands as follows:

| | |
|--|---------------|
| Mixed-Use High Density Residential | Schedule A |
| Specific Provision Area 45 & 50 | Schedule A6 |
| Convertible Frontage Area | Schedule A45a |
| Block Plan Area | Schedule A45b |
| Major Node | Schedule B |
| High Density, 25 Storeys (Northdale) | Schedule B1 |
| City Arterial Road (Columbia St W) | Schedule E |
| City-Wide Cycling and Multi-Use Routes (Columbia St W) | Schedule F |
| University of Waterloo Station Area | Schedule J4 |

The **Mixed-Use High Density Residential** designation contemplates intensification and high-rise built forms up to 81 metres in height and 750 bedrooms per hectare. Schedule B1 enables buildings up to 25 storeys in height, subject to zoning.

Zone Change Application Z-12-05, as amended by minor variance A-32/19, restricts the maximum building height on the Lands to:

- northerly tower (Tower D): 15 storeys (47m)
- southerly tower (Tower C): 20 storeys (61.5m)

The maximum building height regulation established through Z-12-05 reflect the original development concept. The vision for Phase 2 has changed with the passage of time from mid-rise* to high-rise, re-imagining the development within the existing high-density policy framework and current market conditions, and seeking the more efficient use of the Lands.

* Z-12-05: maximum building height of 10 storeys (40m) for Building D and 17 storeys (55m) for Building C.

Zoning By-law Amendment Z-20-03 seeks to increase the permitted height of the towers to 20 storeys (61.5m) and 23 storeys (70.5m) respectively. The proposed building heights are less than the 25 storeys contemplated on Schedule B1 of the Official Plan.

Specific Provision Area 50 (SPA 50) states that no increase in building height shall be permitted (re: maximum 25 storeys), however the density may be increased to 940 bedrooms per hectare. The Official Plan allows Council to increase density beyond 750 bedrooms per hectare in exchange for community benefits pursuant to Section 37 of the Planning Act. In accordance with SPA 50, Zone Change Application Z-12-05 authorized a maximum density of 940 bedrooms per hectare on 330 Phillip Street and 145 Columbia Street West combined in exchange for community benefits and subject to a Section 37 Development Agreement. No change to the permitted density is proposed through Z-20-03.

The application conforms to the City's Official Plan, in staff's opinion.

SECTION 5 – EVALUATION

5.1 Building Height Amendment

Maximum Permitted Building Height: 15 storeys (47m) and 20 storeys (61.5m)

Proposed Building Height: 20 storeys (61.5m) and 23 storeys (70.5m)

Staff support the proposed building height amendment for the following reasons:

- less than the maximum building height of 25 storeys contemplated in the Official Plan
- consistent with the planned character of the area (high-rise buildings, max. 81 metres)
- efficiently uses the lands and existing infrastructure
- promotes intensification within a Major Node planned for high-rise development
- no adverse impacts have been identified through the planning process
- high standard of urban design can be secured through site plan control

5.2 Community Benefits

In 2013, Council authorized density bonusing for 330 Phillip Street and 145 Columbia Street West to 940 bedrooms per hectare in exchange for community benefits pursuant to Section 37 of the Planning Act (re: OPA 85 and Z-12-05).

In 2014, a Section 37 Development Agreement was entered into between the City of Waterloo and 2371632 Ontario Inc. for Phase 1 (330 Phillip Street) to permit the ICON development (866 bedrooms) in exchange for the following community benefits:

- the provision of underground parking
- the provision of public art (\$250,000)
- the provision of enhanced landscaped open space for the public in front of the building
- the development achieving a LEED Silver certification

In 2018, a Section 37 Development Agreement was entered into between the City of Waterloo and 145 Columbia (Waterloo) Corp. for Phase 2 (145 Columbia Street West) to permit 424 bedrooms on the Lands in exchange for the following community benefits:

- the provision of underground parking
- the provision of public art (\$250,000 including public art at 330 Phillip Street)
- the provision of enhanced landscaped open space for the public in front of the building
- the development achieving a LEED Silver certification

The agreement was amended in 2020 to increase the permitted density to 445 bedrooms as a result of design refinements to Phase 2.

If approved, Zoning By-law Amendment Z-20-03 will allow for an additional 100 bedrooms at 145 Columbia Street West through increased tower heights. A Section 37 Development Agreement is required pursuant to Policy 12.3.1(3) of the Official Plan.

Zoning by-laws must conform to applicable official plans in accordance with Section 24 of the Planning Act. Through the planning evaluation of Z-20-03, it was identified that the Official Plan was amended in 2018 (re: Station Area Planning, OPA 14) to remove 'underground parking' as an item eligible for bonusing under Policy 12.3.1(5) of the Plan. In order to advance Zoning By-law Amendment Z-20-03 and adhere to Section 24 of the Planning Act, the provision of 'underground parking' will need to be replaced with an alternative community benefit, in staff's opinion. This is a unique situation without precedent, where the phased implementation of density bonusing requires reconsideration as a result of modifications to the Official Plan. A further complication is that the density bonusing granted through DS2013-004 (re: OPA 85 and Z-12-05) was not based on an uplift valuation or a financial formula, meaning no financial benchmark exists for the historic community benefits.

The bonusing value currently applied in Northdale is approximately \$12,350 per bedroom. In the absence of a financial formula, assuming each community benefit is equal, staff would value the ‘underground parking’ at \$3,087.50 per bedroom¹. Staff recommend that the alternative community benefit for the additional 100 bedrooms be a financial contribution towards the City’s affordable housing grant program in the amount of \$308,750².

¹ $\$12,350 \times 25\% = \$3,087.50$

² $\$3,087.50 \times 100 = \$308,750$

In summary, for Zoning By-law Amendment Z-20-03, the following community benefits are recommended:

- the provision of public art (\$250,000 including public art at 330 Phillip Street)
- the provision of enhanced landscaped open space for the public in front of the building
- the development achieving a LEED Silver certification or higher
- a financial contribution to the City’s affordable housing grant program of \$308,750

5.3 Parking Amendment

Existing Parking Requirement: 0.20 spaces per bedroom + 0.05 visitor spaces per bedroom

Proposed Parking Requirement: 0.175 spaces per bedroom + 0.05 visitor spaces per bedroom

Staff support the proposed parking amendment for the following reasons:

- the Lands are well served by transit
- the Lands are located within 750 metres of two ION Stations
- the Lands are tied to 330 Phillip Street – as discussed in Section 3, the total parking requirement of 390 spaces is satisfied on the combined land holdings
- the Lands are located in close proximity to the University of Waterloo
- the Lands are located in close proximity to Idea Quarter employment area on Phillip Street
- the amendment is minor in nature

SECTION 6 – CONCLUSION

Based on Integrated Planning & Public Works review of the application, we support Zoning By-law Amendment Z-20-03 in accordance with Section 7 of IPPW2021-012 for reasons including:

- the application is consistent with applicable provincial policy statements
- the application conforms to applicable plans including the City’s Official Plan
- the application facilitates the efficient use of lands and existing infrastructure
- the proposed development will complement the planned character of the area

- the application fosters intensification within a Major Node planned for high-rise development
- the proposed parking amendment is minor
- no adverse impacts have been identified through the planning process
- high standard of urban design can be secured through site plan control
- the proposed development is appropriate for the lands and represents good planning

SECTION 7 – RECOMMENDATIONS

- A. That Staff Report IPPW2021-012 be approved.
- B. That Council approve Zoning By-law Amendment Z-20-03, 145 Columbia (Waterloo) Corp., 145 Columbia Street West, as follows:
- i.) That Schedule 'C' to By-law 2018-050 is hereby amended by deleting Subsection m) in Exemption C203 for the lands known municipally as "145 Columbia Street West" which states:
- m) Notwithstanding anything to the contrary, there shall be no required PODIUM for **Building C** or **Building D**, as shown on Image 2. The maximum BUILDING HEIGHT for **Building D** shall be 40 metres and the maximum BUILDING HEIGHT for **Building C** shall be 55 metres.
- and replacing it with:
- m) Notwithstanding anything to the contrary, there shall be no required PODIUM for **Building C** or **Building D**, as shown on Image 2. The maximum BUILDING HEIGHT for **Building D** shall be 61.5 metres (20 storeys) and the maximum BUILDING HEIGHT for **Building C** shall be 70.5 metres (23 storeys).
- ii.) That Schedule 'C' to By-law 2018-050 is hereby amended by adding Subsection r) to Exemption C203 as follows:
- r) Notwithstanding anything to the contrary, the following motor vehicle parking regulations shall apply to the lands known municipally as 145 Columbia Street West:
- i. Residential PARKING SPACES (minimum): 0.175 spaces per BEDROOM
 - ii. VISITOR PARKING (minimum): 0.05 spaces per BEDROOM
 - iii. Non-Residential PARKING SPACES (minimum): 3 spaces per 100 square metres of BUILDING FLOOR AREA

iii.) That Schedule 'C' to By-law 2018-050 is hereby amended by modifying Subsection q) in Exemption C203 for the lands known municipally as "145 Columbia Street West" as follows: [modifications underlined]

- q) Notwithstanding anything to the contrary, the following regulations shall apply to the lands known municipally as 300-330 Phillip Street and 145 Columbia Street West:
- i. DENSITY (maximum, per hectare): 940 bedrooms, with no more than 3 bedrooms per unit.
 - ii. The maximum density described in section q).i. herein shall be permitted provided the owner enters into a Development Agreement with the City of Waterloo pursuant to Section 37 of the Planning Act to secure the facilities, services and matters referred to below. The Agreement shall be registered against the title of the lands in the manner and to the extent specified in such Agreement. The details of the facilities, services and matters to be provided shall be contained in the Section 37 Development Agreement. The owner of the subject lands, at the owner's expense and in accordance with and subject to the Development Agreement, shall provide the following facilities, service and matters in accordance with Section 12 of the Official Plan (2012) and to the satisfaction of the City of Waterloo, in exchange for the increase in density specified in section q).i. herein:
 - A. For density equal to or less than 1,311 bedrooms, underground parking (parking that is below grade and not visible throughout the site, despite changes in grade), representing a minimum of 60% of the supplied parking spaces. A floor plan which shows the layout and number of parking spaces provided underground shall be submitted to the City for review as part of the Development Agreement.

For density between 1,311 bedrooms and 1,411 bedrooms, a financial contribution to the City's for affordable housing in the amount of \$3,087.50 per bedroom;
 - B. Public art, representing 1% of the value of construction as stated on the building permit application, not to exceed \$250,000, in a location or locations satisfactory to the City of Waterloo. The applicant shall prepare and submit a Public Art Selection Plan to the satisfaction of

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the City of Waterloo. The requirements of said Plan are to be detailed in the Development Agreement;

- C. Enhanced landscaped open space for the public in front of the two buildings on Phillip St and the building on Columbia St. The landscape open space shall:
 - a. be provided on the subject lands and within the road allowance (as appropriate) along the Phillip Street and Columbia Street West frontages;
 - b. be maintained by the owner of the subject lands or a condominium corporation, should a condominium corporation be created for the proposed development;
 - c. be accessible by the public;
 - d. include hard landscaping (pavement treatments) distinguished from the sidewalk and representing an upgrade over a standard sidewalk and/or concrete entrance;
 - e. include soft (vegetative) landscaping treatments designed to provide shade for pedestrians and those visiting the site;
 - f. include parking for bicycles for those visiting the site, including sheltered publicly accessible cycling parking facilities; and
 - g. include the provision of seating areas to encourage interaction amongst residents of the neighbourhood.

- D. LEED Silver minimum certification for all buildings on site. The process by which certification is confirmed and penalties for non-compliance, shall be detailed in the Development Agreement.

APPENDIX 'A'

Minutes of Informal Public Meeting

COUNCIL MEETING
Monday, November 2, 2020

INFORMAL PLANNING MEETING

- a) Title: Zone Change Application Z-20-03
145 Columbia (Waterloo) Corp.
145 Columbia Street West
- Prepared by: Joel Cotter
- Ward No: Ward 6 – Central-Columbia
- Presentation: Joel Cotter, Director of Planning and City Planner

The Chair advised that the Informal Meeting was the first opportunity to inform Council and the public of the application and emphasized that no decision would be made by Council at this meeting. Joel Cotter, Director of Planning and City Planner, provided an overview of the process for the proposed amendment to the Official Plan by the City of Waterloo and responded to questions from Council.

Harry Froussios, Senior Associate, Zelinka Priamo Ltd. – spoke on behalf of the landowners in support of the application. Answered questions from council. Informed council that the intention of his client is to comply with all bylaws and regulations.

As no one else was present to speak to the application, the Chair concluded the Informal Public Meeting and indicated that staff will review the issues and report back to Council at a later date.

APPENDIX 'B'

AGENCY, STAFF & PUBLIC COMMENTS

The following are pertinent comments received from agencies, stakeholders, and internal staff groups related to Zoning By-law Amendment Z-20-03:

City of Waterloo Transportation Services

Columbia Street shall not be used for construction staging or parking. The sidewalk will need to remain open at all times with appropriate protections for user safety.

Waterloo North Hydro

With the additional height of the building, the customer will have supply a new load calculation for the building to WNH and may need a second vault room.

Waterloo Catholic District School Board

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

Waterloo Region District School Board

Based on the bedroom counts provided, it is understood that this development is not anticipated to attract families of school aged children. If school aged children reside in the building, they will be directed to Winston Churchill Public School for Grades JK to 6, MacGregor Public School for Grades 7 to 8, and Waterloo Collegiate Institute for Grades 9 to 12. Note, all of these schools are significantly over-utilized, each with six to nine portables on site. It is unclear at this time whether additional portables can be accommodated at these sites. Accommodation pressures may become unmanageable by portables alone.

Through the site plan process, the following matters are to be addressed:

- i. Student Transportation Services of Waterloo Region ("STSWR") is to be contacted to provide any relevant comments on transportation requirements including school vehicle routes and infrastructure needs (including pedestrian facilities), and requests for student travel plans to area schools;
- ii. Address all structures/facilities that might impede pedestrian (student) safety;
- iii. Confirm the proposed tenancy (condominium or freehold units);
- iv. Bedroom counts are to be confirmed for WRDSB student yield estimates.

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

Region of Waterloo

1. Environmental Noise

Regional Staff have reviewed the report entitled “Noise Impact Study, 145 Columbia Street West” authored by JJ Acoustic Engineering Ltd. (July 9, 2020) as it relates to transportation noise for the proposed development at 145 Columbia Street West. The owner/applicant will be required to enter into a registered development agreement with the municipality for Buildings C and D to secure the required noise mitigation/warning clauses as part of any condominium process:

- a.) The dwelling / building will be constructed with forced air-ducted heating and ventilation system suitable sized and designed with central air conditioning.
- b.) The following noise warning clause will be included in development agreements, purchase and tenancy agreements, and offers of purchase and sale for the dwelling units:

“This dwelling unit has been supplied with a central air conditioning system which will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Regional Municipality of Waterloo (RMOW) and the Ministry of Environment, Conservation and Parks (MECP)”.

2. Stationary Noise

Regional Staff continue to review the stationary noise study submitted in support of the application. Staff have been in contact with the noise consultant seeking clarification on the stationary noise assessment. Prior to the passing of the implementing by-law, a stationary noise assessment satisfactory to the Region of Waterloo is required.

Growth Management – City of Waterloo

The Official Plan designates the subject lands as “Mixed-Use High Density Residential”, which in Northdale has a maximum height of 25 storeys. The proposed tower heights of 20 and 23 storeys do not exceed the maximum height set out in the Official Plan.

Notwithstanding the contemplated heights in the Official Plan, the proposed heights exceeds the heights permitted in the Zoning By-law and therefore this application is subject to the Official Plan’s bonusing policies, in staff’s opinion.

Comments Received From The Public

- Two (2) questions received pertaining to shadow impacts on 330 Phillip Street
- Comment that the increased tower heights will further block views from 330 Phillip Street
- Question regarding the safety and certification of infrastructure in relation to 330 Phillip Street

APPENDIX 'C'

Rendering

