MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

March 24, 2025

Rita Szilock, Planner
Planning Approvals, City of Waterloo
100 Regina Street South
PO Box 337, Station Waterloo
Waterloo, ON N2J 4A8

Dear Rita Szilock,

RE: Planning Justification Report Addendum #2
Official Plan Amendment and Zoning By-law Amendment Applications
720 Erbsville Road, Waterloo
CITY FILE: Official Plan Amendment No. 45 & Zoning By-law Amendment Z-22-15
OUR FILE: 0977D

On behalf of our client, Sunvest Group of Companies c/o Peter de Groot, we are pleased to submit a second addendum to the Planning Justification Report dated December 2021, regarding the proposed Official Plan Amendment and Zoning By-law Amendment Applications on the lands municipally known as 720 Erbsville Road, Waterloo (the "subject lands").

Since submitting the Planning Justification Report, comments have been received on the Official Plan and Zoning By-law Amendment Applications that have resulted in updates to the plan. This letter provides an update to the Planning Justification Report to address updates to the plan and response to comments as follows:

Low Density Residential Designation and Erbsville South Block Plan (SPA 3):
The plan has been revised to reduce the size of each stacked townhouse block from 24 units per block, to 16 units per block. Policy 11.1.3(31)(a) permits stacked townhouses with 4 units in width and a maximum of 2 units vertical, and a total of 8 units per block. The plan proposes stacked townhouses with 4 units in width and 4 units vertical, and a total of 16 units per block. The proposed increased unit density per block provides a more efficient built form at a more affordable price than other traditional forms of ground relate housing. The proposed stacked townhouse blocks have a proposed height of 12 metres, which is an increase of 2 metre above the 10 metre height permitted in the Low Density area.

The overall mass of the building is balanced between the increased building height and the reduced block width, by limiting the block width to 4 units. The proposed stacked townhouse units will contribute to the range of units available on the subject lands and in the Erbsville community, while maintaining the low rise nature of the neighbourhood.

Policy 10.1.3(9) of the Official Plan has been reviewed to assess the location criteria for stacked townhouse units. The subject lands are not located on a Node or Corridor. The lands are on Erbsville Road which is a Regional Arterial Road, as identified on Schedule 'E' of the City's Official Plan, which permits the stacked townhouse units. Further, the subject lands are located on the edge of an existing low density residential neighbouhood, with existing low density residential development to the west, separated by an arterial road, natural heritage lands to the north and east, and planned development lands to the south. The planned development lands to the south are zoned for medium to high density residential uses subject to a holding provision. The proposed stacked townhouse and townhouse development is located adjacent to planned density and is a residential form of development that will transition between the existing low density residential neighbouhood and the surrounding forested area.

Parking

A zoning by-law amendment for a reduced parking rate is no longer being requested. The plan has been revised to provide additional parking, and the parking standards for townhouse and stacked townhouse units are both being achieved. Townhouse and stacked townhouse units are provided with a parking rate of 1.35 parking spaces per unit.

Zoning Setbacks

The previous concept plans proposed an interior lot line setback of 2.8 metres and 3.2 metres, where the Cluster Development provisions of the zoning by-law require a minimum interior lot line setback of 7.5 metres. The interior lot line setback has been increased and is a minimum of 5.0 metres in most areas. A pinch point exists at the corner of Block 14 and Block 8 where the interior lot line setback is 3.6 metres and 4.0 metres along the OS1 and OS3 zones. A minimum interior lot line setback of 3.6 metres is proposed. Although this is a reduction from the standard 7.5 metre setback, the reduction is minor in nature given the site's context. The reduced interior lot line setback accommodates the edge of the environmental buffers, which effect the abutting natural heritage lands, and the zone boundary between the R8 and OS1 zone with accommodates the on-site Stormwater Management Pond. Further, the interior lot line setback abuts the Natural heritage buffers and Stormwater Management Ponds, which do not create a separation concern from a structural or visual perspective. The remainder of the interior lot line setbacks effect 762 Erbsville Road, which is a separate development parcel, but is planned for similar uses to the subject lands.

A site-specific provision is proposed to prohibit accessory buildings and fences within a yard which abuts a public highway. This provision is proposed to prohibit sheds and fences within the Erbsville Road frontage of the subject lands. The proposed stacked townhouses have been designed to address Erbsville Road with front entries from the public street, and the prohibition of fences and sheds in this setback will ensure that an inviting front yard treatment is provided on this road frontage.

A reduced minimum street line setback is proposed to accommodate the revised design of the development with stacked townhouse units facing Erbsville Road. The stacked townhouse units each have front stairs which extend within the required 6m setback from the street line. The main stacked townhouse buildings are located over 6 metres from the street line, but the amendment is proposed to permit the front stairs of each unit to encroach 1 metre into the street line setback. The reduced setback is appropriate as it will help the stacked townhouse units address the public street and

increase interaction between the private and public realm. The reduced setback is not anticipated to create any concerns from a long term road network perspective as the proposed development includes the conveyance of a 2.1 metre road widening on Erbsville Road. There are no additional road widenings anticipated for the subject lands.

A site-specific provision is proposed to prohibit accessory buildings within a private amenity area. This provision is proposed to prohibit sheds within the private amenity areas of the proposed Townhouse units. A reduced rear yard and deck setback is proposed for the townhouse units and the prohibition on sheds will ensure that rear yard amenity areas have sufficient space for drainage, landscaping, access easement (if any) and fencing. The proposed development is proposed to be developed as a plan of condominium, and each townhouse unit has an attached garage. An shed is not anticipated to be necessary for future residents considering the limited private landscaping requirement of each unit.

The proposed rear yard setback has been increased from 2.8 metres to 5.0 metres, where the zoning by-law requires a minimum setback of 7.5 metres. The reduced rear yard setback allows sufficient rear yard amenity space for the use and enjoyment of residents. The deck provisions of the zoning by-law are proposed to be amended to allow a deck to extend up to 2 metres from a rear lot line, where the By-law permits a deck to extend up to 4 metres from a rear lot line. The proposed amendment to the deck provisions will allow for the future construction of decks up to a depth of 3 metres. The proposed rear yard setback is a 2.5 metre reduction from the standard 7.5 metre rear yard setback requirement, and the proposed 2 metre reduction to the required deck setback adjusts for the smaller rear yards proposed. The other general provisions for decks will continue to apply. A conceptual rear yard cross-section has been submitted to demonstrate how the proposed rear yards will be able to accommodate sufficient drainage, landscaping, access easement (if any) and fencing. As noted above, sheds will not be permitted in these private amenity areas.

Design Consideration of 762 Erbsville Road

The updated concept plan has relocated the stormwater management facility to a location that can be consolidated with the adjacent lands, subject to a servicing agreement with the landowner. The Stormwater Management facility location reflects the proposed location in the Erbsville South Block Plan Area. The grading along the property line with 762 Erbsville Road has also been revised to remove the need for retaining walls along the shared property boundary. Future development of the adjacent lands will require detailed plans for these lands for site plan approval.

Proposed Official Plan Amendment

The proposed Official Plan Amendment seeks to permit site specific policies for stacked townhouse units, specifically to permit stacked townhouse buildings with a maximum of 4 units in width and a maximum of 4 units vertical. The Official Plan Amendment also seeks to permit a maximum building height of 12 metres for stacked townhouses.

Proposed Zoning By-law Amendment

The proposed zoning by-law amendment seeks to rezone the subject lands from Future Determination (FD) to Residential Eight with site specific provisions (R8-XXX), Parks & Recreation (OS1) and Conservation (OS3). The following site specific provisions are required for development:

- Minimum interior lot line setback abutting the OS1 and OS3 zone of 3.6 metres

- Minimum rear yard setback abutting the OS3 zone of 5.0 metres
- Maximum building height of 12m for Stacked Townhouse blocks
- Minimum Street Line Setback of 5m
- Notwithstanding section 3.D.2.6, Decks are prohibited within 2.0 metres of the Rear Lot Line
- Notwithstanding section 3.A.1.1, ACCESSORY BUILDINGS and fences shall not be permitted in a yard which abuts a public HIGHWAY.
- Notwithstanding section 3.A.1.1, ACCESSORY BUILDINGS shall not be permitted in a private amenity area.

We thank you for considering this additional information. Please do not hesitate to contact the undersigned should you have any questions or concerns.

Yours truly,

MHBC





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Partner

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Associate