Response to City of Waterloo Post-Circulation Comments (August 2024)	
COMMENT	RESPONSE
Density 1. As noted in Table 2 of the Supplemental Report (MHBC Planning, June 2020), the current Draft Plan proposes a net density of 64-106 persons and jobs per hectare. This exceeds the planned density of 58 persons and jobs per hectare which applies to the entire BCMDP. In general, staff support the proposed higher density given that the density target of 58 persons and jobs per hectare applies to a broader geographic area, and the higher density may help to offset any density shortfalls within other areas of the BCMDP. The proposed density must be accommodated within a Draft Plan that aligns with the planning framework established in the Official Plan and the BCMDP, and is implemented through zoning regulations that provide for appropriate scale, massing, functionality and design. This is further discussed in Part B, Zoning Comments (below). 2. Density calculations should be provided that are based on: a) The Region's revised land budget, to demonstrate that the proposed Draft Plan meets the minimum density requirement of 55 people and jobs per hectare, as required by Section 2.D.17(b) of the Regional Official Plan; and b) The City's land use assumptions (Table A) of the BCMDP, to demonstrate that the proposed Draft Plan meets the minimum density requirement of 58 people and jobs per hectare, as required by Specific Provision Area (SPA) 62 of the City's Official Plan and Section 1.3.1(b)(ii) of the BCMDP 3. Density calculations to demonstrate ROP conformity should be based on the 'persons per unit' (ppu) values contained in the Region's revised Land Budget. For Blocks 18 and 19, the "Multiple Block" ppu should apply, and for Block 24 (Future Development), the "Townhouse" ppu should apply 4. Section 3.4.5 of the BCMDP states that residential types and densities must be consistent with the housing mix and density ranges for each of the land use designations outlined in Table 3. The density ranges, as applied to the revised Draft Plan, are as follows:	• Updated density calculations are enclosed with this submission. • The development has a minimum density of 64 persons and jobs per hectare (using the Region's land budget ppu). • The development has a minimum density of 75 persons and jobs per hectare using the City's land use assumptions in the Beaver Creek Meadows District Plan. • The Draft Plan has been updated to address comments 5(a) to 5(e) • The minimum number of units in each lotless block planned for single detached and semi-detached dwellings is based on a minimum lot frontage of 13.7 metres • The maximum number of units in each lotless block planned for single detached and semi-detached dwellings is based on a minimum lot frontage of 9.0 metres • Note 2 in the Area Schedule has been revised to note that the minimum lot width for street fronting towns is 5.5 metres • Notes 3 and 4 have been revised to refer to density in bedrooms per hectare only, consistent with the Official Plan and Zoning Bylaw • The Net Area for the purposes of calculating the overall density does not include Blocks 22 and 23 as per the Growth Plan

Designation	**Block Numbers**	**Land Area (ha)**	**Density Range per BCMDP (units/ha)**	**Density Range Based on Land Area (units/ha)**	**Proposed Density Range (units/ha)**
Low Density Residential 1	1-10	2.815	25-35	**70**-98	**54**-88
Low Density Residential 2	11-18, 24	2.263	35-60	79-135	93-130

Medium Density Residential (Node)	19	0.802	60-100	48-**80**	48-**120**
TOTAL		5.88		**197**-313	**195**-**338**

Based on the above, and a review of the dwelling types permitted in each of the land use designations, staff note that:

a) The proposed density within the Low Density Residential 1 lands does not meet the minimum density required by the BCMDP (54 units are proposed, whereas a minimum of 70 units is required based on the land area and the density range of 25 to 35 units per hectare);

b) The proposed density within the Medium Density Residential (Node) lands exceeds the maximum density permitted by the BCMDP (120 units are proposed, whereas a maximum of 80 units are permitted based on the land area and density range of 60 to 100 units per hectare); and

c) Back-to-Back Townhouses are only permitted in the Medium Density Residential (Node), whereas such townhouses are proposed within Low Density Residential 2, and Stacked Back-to-Back Townhouses are not contemplated within the BCMDP

d) Staff do not object to the items (a) to (c) above, provided that the Draft Plan meets the intent of the BCMDP in other ways, and the proposed zoning does not result in overbuilt lots/blocks. Based on a review of the revised Draft Plan, staff currently have concerns with or require rationale in support of some of the proposed zoning regulations (see Part B, Zoning Comments, below). All zoning matters will need to be resolved before staff can fully support the proposed distribution of density and the Back-to-Back and Stacked Back-to-Back Townhouses. In addition, an amendment to the BCMDP will be required for clarity purposes.

5. Staff recommend that the Area Schedule on the revised Draft Plan be revised as follows:

a) The term "Residential" (Block 1-10) should be replaced with "Singles/Semi Detached" to accurately reflect the intended land use;

b) The land area for "Residential" (Blocks 1-10) is noted in the Area Schedule as 2.814 ha. However, based on the land areas noted within each of the Blocks on the Draft Plan, the total area is 2.815 ha. Please confirm and correct;

c) The land area for "Street Towns" (Blocks 11-17) is noted in the Area Schedule as 1.250 ha. However, based on the land areas noted within each of the Blocks on the Draft Plan, the total area is 1.169 ha. Please confirm and correct;

d) The land use for Blocks 11, 12 and 13 is noted in the Area Schedule as "Street Towns", but is labelled on the Draft Plan as "Residential". This should be corrected;

e) The total land areas in the Area Schedule is noted as 8.006 ha. Based on the adjustments noted in (b) and (c) above, this should be confirmed and corrected as necessary;

f) Note 1 within the Area Schedule states that the residential unit yield is "based on 13.7m Lots (min) and 9.0m Lots (max)." Clarify the numerical values assigned to the minimum and maximum; g) Note 2 within the Area Schedule states that Street Towns are based on a minimum lot width of 5.0 m. However, the minimum lot width for Freehold Townhouses, as currently proposed, is 5.5 m; h) Note 3 within the Area Schedule states that the maximum number of Multiple Residential units for Block 18 consists of Low Rise Apartment units "calculated at 60 Units per Hectare or 150* Bedrooms per Hectare." A maximum of 76 units has been determined for Block 18, as noted in the Area Schedule, which exceeds the rate of 60 units per hectare; i) Note 4 within the Area Schedule states the maximum number of Multiple Residential units for Block 19 consists of Low Rise Apartment units "calculated at 100 Units per Hectare or 300* Bedrooms per Hectare." A maximum of 120 units has been determined for Block 19, as noted in the Area Schedule, which exceeds the rate of 100 units per hectare. 6. Policy 2.2.7(3) of Places to Grow (2019) specifies that the minimum density target is to be measured over the entire designated greenfield area, excluding prescribed takeouts. Such takeouts include rights-of-way for electricity transmission lines. On this basis, Blocks 22 and 23, which contain electricity transmission lines, should be removed from the total land area. Density should be recalculated based on the net land area (excluding Blocks 22 and 23), and accounting for paragraphs 1 to 5 above	
Zoning Comments	RESPONSE
Residential Five (R5) Zone - Blocks 1 to 10 7. This portion of the Draft Plan is designated Low Density Residential 1 in the BCMDP 8. Staff do not object to the removal of coach house as an ancillary use, but question the removal of duplexes as a primary use 9. A site specific zoning regulation is proposed which reduces the minimum lot area for corner lots applicable to Semi-Detached Buildings, from 504 square metres as required in the R5 zone, to 477 square metres. Corner lots within the Draft Plan that are proposed to be zoned R5 are limited to Blocks 7 and 10. Staff do not object to this site specific zoning regulation to be applied in Block 7. However, the corner lot in Block 10 (at the Rideau River Street/Conservation Drive intersection) is identified as a Gateway Lot in the BCMDP. Gateway Lots are priority lots that are in prominent locations and highly visible from the public realm. Section 3.2.14 of the BCMDP requires dwelling units on Gateway Lots to be designed with consideration given to the following: 10. For Single Detached Buildings, the proposed minimum lot frontage of 9.0 metres for interior lots and 12.0 metres for corner lots is slightly larger than the minimum lot frontage requirements within the R5	NOTE – the Zoning has been revised to reflect the City's preference for new zones within the Beaver Creek Meadows community. The lands originally intended to be zoned R5 are now proposed to be zoned Residential Beaver Creek 2 (RBC2) 7. Acknowledged 8. A secondary unit is permitted 9. The minimum corner lot area has been revised to 504 square metres 10. The minimum lot frontage has been revised to 8.5 metres to be consistent with the City's regulations for the RBC2 zone 11. The minimum corner lot frontage has been reduced to 8.4 metres

zone, of 8.5 metres and 11.0 metres for interior and corner lots respectively. The proposed site specific regulations are acceptable on the basis that they are consistent with the BCMDP 11. For Freehold Semi-Detached Buildings: a) interior lots, the proposed minimum lot frontage of 6.8 metres is slightly less than the minimum lot frontage requirement within R5 zone of 7.5 metres b) corner lots, the proposed minimum lot frontage of 9.0 metres is slightly greater than the minimum lot frontage requirement within the R5 zone of 8.4 metres The proposed site specific regulations are acceptable on the basis that they are consistent with the BCMDP 12. The Supplemental Planning Justification Report (June2020) notes that the proposed side yard setback of 0.6 metres on one side and 1.2 metres on the other side (and in no case shall a dwelling be located closer than 1.8 metres to a dwelling on an adjacent lot) assists in contributing towards the planned density of 58 persons and jobs per hectare. However, this Draft Plan of subdivision is currently proposing a density of 64-106 persons and jobs per hectare, which exceeds the density target. Reducing the side yard setback does not appear to be required to achieve the density target. In addition, a minimum side yard setback of 1.2 metres is established in zoning to ensure there is sufficient room for property and dwelling maintenance, snow storage, and drainage. Staff recommend that a minimum side yard setback of 1.2 metres be maintained within the R5 zone as part of any revised submission. 13. Staff do not object to the increased maximum building height, from 9.5 metres as permitted in the R5 zone, to 10.0 metres, to be consistent with the Official Plan. Staff recommend that the building height regulation be further capped at 3 storeys to align with the BCMDP. 14. A site specific regulation is proposed which establishes the maximum lot coverage for all buildings of 55%. This proposed regulation remains under review, with consideration given to the stormwater management report submitted in support of this application, and the targets established for the proposed communal stormwater management facility serving this and several other subdivisions in the area. Applying a maximum impervious area instead of a maximum lot coverage is being considered. 15. Staff have concerns with the request to permit a maximum encroachment of 1.8 metres into the front yard and/or flankage yard for a one storey unenclosed porch. The R5 zone being requested provides for smaller lots in comparison to the lands to the north which are primarily zoned R4. In staff's opinion, the smaller lots, combined with large encroachments, would create a streetscape that is not in keeping with the existing neighbourhood. Furthermore, through staff's review of the Cook/Mattamy Draft Plan of subdivision, the City's Director of Planning Approvals determined that the maximum encroachment the City will support is 0.6 metres into the front yard and/or flankage yard for a one storey unenclosed porch.	12. The side yard setback has been revised to 1.2 metres on each side, which is consistent with the minimum side yard to be applied to all lands zoned RBC2 within the District 13. The inclusion of "and 3 storeys" is on the basis that the measurement of height is at the front of the dwelling, and not at the rear, where grades may result in a walkout basement. 14. We understand this matter was discussed and the 55% lot coverage was determined to be appropriate for the RBC2 zone. 15. We understand porches will be permitted to encroach up to 0.6 metres into the front and/or flankage yard. 16. We understand this matter was discussed internally and that staff support a garage width of 58% within the RBC2 zone. 17. The side yard setback has been increased to 1.2 m on each side as discussed earlier. 18. The noise related setback has been measured from the property line, in addition to the centreline of the road related to outdoor amenity areas. The setback is 8.9 metres. 19. a) noted 19. b) The proposed RBC2 zone does not specify the number of garages permitted – we understand the interpretation is that each semi-detached unit would be permitted its own garage. 19. (c) – the proposed RBC2 zone includes a regulation indicating how a garage is to be measured.

16. Staff have concerns about expanding the proportion of the garage and driveway from 55% to 58%. Additional information is required to support this request. 17. As noted above, staff do not support the proposed reduction to the side yard setback, and have concerns about the treatment of Block 10 (the Gateway Lot) at the corner of Rideau River Street and Conservation Drive. Revisions to the plan in addressing these matters could negate the need to reduce the minimum side yard setback for the north side yard of Block 10 (proposed Section 7.5.6). Please confirm. 18. The setbacks that are required to implement the findings of the noise study should be translated into setbacks from the property line within Block 10, (rather than from the centerline of Conservation Drive) and should account for the required road widening along Conservation Drive. As well, the term "outdoor amenity area" used in proposed Section 7.5.7 is not a defined term in the Zoning By-law, which makes implementation problematic. Note, all recommended noise attenuation measures are subject to Regional review and acceptance. Please revise accordingly. 19. The R5 zone (By-law 2018-050) contains a number of regulations that have not been included in the site specific R5 zoning for this subdivision. Staff comments pertaining to these regulations are as follows: a) Section 7.5.3 of the R5 zone provides alternative lot dimensions for shallow lots (lot depth of 24 metres). Staff do not object to the removal of this provision since the depths of the proposed blocks are greater than 24 metres b) Section 7.5.6 of the R5 zone specifies that a maximum of one private garage is permitted per lot, with exception to semi-detached buildings where a maximum one (1) private garage per principal dwelling unit shall be permitted. Staff recommend this regulation be included in the proposed site specific R5 zone c) Section 7.5.8 of the R5 zone specifies how a private garage is measured. Staff recommend this regulation be included in the proposed site specific R5 zone	
Residential Eight (R8) Zone - Blocks 11 to 17 and Block 24 20. This portion of the Draft Plan is designated Low Density Residential 2 in the BCMDP 21. Blocks 11 and 12 are identified on the Draft Plan as "Street Towns", but appear in the Functional Servicing Report as individual lots intended for single detached buildings. Please clarify the intended use of these blocks to ensure accurate density calculations. The Functional Servicing Report should also be reviewed and updated accordingly to reflect appropriate stormwater management infrastructure based on the intended use 22. Stacked Townhouse Buildings have not been included as a permitted use in the site specific R8 zone. The Planning Justification Report notes that the built form of this dwelling type "…is not conducive to the Block sizes and configurations." Stacked Townhouse Buildings are permitted in the R8 zone (By-law	NOTE – the Zoning has been revised to reflect the City's preference for new zones within the Beaver Creek Meadows community. The lands originally intended to be zoned R8 are now proposed to be zoned Residential Beaver Creek Three (RBC3) 20. Acknowledged 21. The lands are intended for Street Towns. 22. The RBC3 zone permits Stacked Townhomes. 23. Acknowledged

2018-050) and on lands designated Low Density Residential 2 in the BCMDP. In addition, many of the zoning regulations for Stacked Townhouse Buildings are similar to those applicable to "Townhouse Buildings". Consider adding this dwelling type as a permitted use 23. Staff do not object to the removal of coach houses as ancillary use 24. Staff do not object to the reduced minimum corner lot frontage for Freehold Townhouse Buildings from 11.5 metres as required in the R8 zone, to 9.5 metres, on the basis that the proposed regulation better aligns with the BCMDP 25. Staff have concerns with the proposed minimum side yard setback for Freehold Townhouse Buildings of 1.2 metres, whereas 1.8 metres is required in the R8 zone. Please provide justification. 26. The R8 zone requires a minimum interior lot line setback of 7.5 metres for Townhouse Buildings. Rationale and/or justification is required for the removal of this regulation 27. The maximum building height of 10.0 metres is consistent with the Official Plan and the R8 zone. Staff recommend that the building height regulation be further capped at 4 storeys to align with the BCMDP 28. The R8 zone permits a maximum density of 150 bedrooms per hectare for Freehold Townhouse Buildings. Why has this regulation been removed? 29. A site specific regulation is proposed which increases the maximum lot coverage for Freehold Townhouse Buildings from 40% as permitted in the R8 zone, to 55%. As noted above (Paragraph no. 14), this proposed regulation remains under review. Applying a maximum impervious area instead of a maximum lot coverage is being considered 30. A site specific regulation is proposed which applies a 30% minimum Landscape Open Space requirement to Townhouse Buildings, whereas the R8 zone applies this regulation to all permitted dwelling types. Staff do not support the removal of this requirement from other dwelling types 31. Staff have concerns with establishing a minimum street line flankage setback of 3.0 metres for Townhouse and Freehold Townhouse Buildings. Please provide rationale 32. A site specific regulation is proposed to permit the maximum garage width for Freehold Townhouse Buildings to be up to 60% of the front building façade length, AND for driveways to extend 0.3 metres past either side of the garage. Staff are concerned that the effect of these provisions, combined with the small lot frontage (5.5 metres), will negatively impact the streetscape 33. A site specific regulation is proposed which specifies that a garage shall not be any closer to the front lot line than the habitable floor space of the dwelling AND a one storey unenclosed porch associated with a townhouse or freehold townhouse may encroach into the front yard and/or flankage yard by 1.8 metres. Staff support that portion of the regulation that addresses the garage location, but do not support the magnitude of the porch encroachment, given the smaller sized lots. As previously noted, the maximum encroachment of 0.6 metres into the front yard and/or flankage yard for a one storey unenclosed porch will be considered	24. Acknowledged 25. The side yard setback in the RBC3 zone is 1.8 metres for Freehold Townhomes. 26. Townhouse buildings are not proposed on any of Blocks 11-17 or 24. The Bylaw has been updated to include the regulation, as it will not apply to the development 27. The RBC3 zone limits height to 3 storeys 28. This matter was previously discussed with City staff. Applying a bedrooms/ha density limit on street fronting townhomes would prevent the development of 3 bedroom units. The RBC3 zone does not regulate density for Freehold Townhomes. 29. The RBC3 zone, as developed by City staff, permits a lot coverage of 55% 30. Acknowledged – it has been included 31. The RBC3 zone, as developed by City staff, permits a minimum 3.0 metre flankage yard. 32. The RBC3 zone, as developed by City staff permits a maximum garage width of 60% and permits a driveway to extend by 0.3 metres on either side of the garage 33. The RBC3 zone permits porch encroachments of up to 0.6 metres into the front and/or flankage yard. 34. Triplexes are not proposed, the By-law has been updated to remove the proposed encroachment 35. A site specific exception is proposed to permit up to 8 units for Block 16 only. The District Plan permits up to 8 units in a townhouse block

34. A site specific regulation is proposed to permit stair and landings associated with a Triplex Building to encroach into the street line setback by 2.5 metres. This seems aggressive. Why is this encroachment being requested? 35. A site specific regulation is proposed to permit a maximum of 8 Townhouse or Freehold Townhouse Buildings per block. The maximum number of Townhouse or Freehold Townhouse Buildings per block should not exceed 6, as per the definition of Townhouse Building. Staff may consider a maximum of 8 units per block in very limited and unique circumstances with appropriate justification. The BCMDP notes that where 8 units are proposed, individual lot widths should not exceed 6.5 metres	
Residential Nine (R9) Zone - Block 18 36. This portion of the Draft Plan is designated Low Density Residential 2 in the BCMDP 37. Freehold Townhouse Buildings and Triplex Buildings are permitted in the R9 zone and on lands designation Low Density Residential 2 in the BCMDP, but have not been included in the site specific zoning. Consider adding these uses to broaden the range of dwelling types 38. Back-to-Back Townhouse Buildings and Stacked Back-to-Back Townhouse Buildings are proposed as permitted dwelling types within the site specific R9 zone. These housing forms are new to the City of Waterloo. Staff offer the following comments at this time: a) The lands within Block 18 are designated Low Density Residential in the Official Plan. The intent of this designation is to provide for a mixture of low-density residential building types. This includes townhouse buildings. Back-to-Back Townhouses and Stacked Back-to-Back Townhouses are not specifically reflected in the Official Plan. Nonetheless, staff are of the opinion that the Back-to-Back Townhouse Building aligns with the intended vision of the Low Density Residential designation, subject to zoning regulations that provide for a low-rise housing form and sites that are not overbuilt. Stacked Back-to-Back Townhouses, on the other hand, tend to be of a massing and scale that is generally consistent with a low-rise apartment buildings, as suggested in the Planning Justification Report b) The Official Plan provides for the consideration of more intensive forms of housing within the Low Density Residential designation provided that specific contextual, built form and locational criteria are met (Policies 10.1.3 (7) to (11)). A review of the Block 18 lands relative to this policy framework has been provided, however, only Policy 10.1.3(9) has been assessed. A full analysis of the above-noted policies must be provided. It is worthy to note that Policy 10.1.3(8)(f)) of the Official Plan requires the applicant to demonstrate that "…the proposal does not require significant relief from standard regulations". Compelling rational should be provided which demonstrates that apartments (including Stacked Back-to-Back Townhouses) and/or Terrace Dwellings would be appropriate uses	NOTE – the Zoning has been revised to reflect the City's preference for new zones within the Beaver Creek Meadows community. The lands originally intended to be zoned R9 are now proposed to be zoned Residential Beaver Creek Four (RBC4) 36. Acknowledged 37. Neither Freehold Townhouse nor Triplex are proposed for Block 18. Given the location and depth of the Block, street fronting townhouse units would represent an inefficient built form. We note that the RBC4 zone does not permit Freehold Townhomes. 38. (a) – noted 38 (b). – City initiated OPA 34 introduced a site specific policy for lands within the Beaver Creek Meadows District that permits a height of 4 storeys and 12 meres for lands designated Low Density Residential 2 in the District Plan. Block 18 is designated Low Density Residential 2 and the permitted height of 12 metres and 4 storeys conforms to OPA 34. The District Plan permits apartment buildings on Conservation Drive – the evaluation of the City's policies in Section 10.1.3 was undertaken through the District Plan process and the multi-storey, multi-unit forms of housing were deemed appropriate. The matters raised in comment 38.c can be considered and addressed through the Site Plan process when detailed plans are prepared and advanced for consideration.

within Block 18, and performance standards should be advanced that provide for appropriate height and density, in addition to adequate open space and parking c) In addition to the above, staff have general concerns about the use of Back-to-Back and/or Stacked Back-to-Back Townhouse Buildings, as shown on the Revised Preliminary Servicing Plan. These concerns include: • The visibility of parking from Conservation Drive • Insufficient supply of parking • Lack of outdoor amenity space • Lack of space for garbage pick-up and snow storage • Minimal buffers between the dwellings and parking/drive aisle • Accommodation of and visual impacts from multiple air conditioning units. • Staff need confirmation that Back-to-Back Townhouse Buildings can be accommodated without foregoing functionality and neighbourhood aesthetics. In this regard, please provide a Concept Plan and a written response addressing the above concerns. It would also be helpful to understand the interface of the development along Conservation Drive, in light of these dwelling types, the associated parking and the proposed retaining wall along Conservation Drive. In addition, staff strongly recommend reducing the number of Back-to-Back units which would, in turn, reduce parking requirements and provide more opportunity for on-site amenity areas d) Policy 3.4.5 (and Table 3) of the BCMDP identifies Back-to-Back Townhouse Buildings as a dwelling type that is consistent with the Mixed-Use Medium Density Residential (Node) designation, whereas this form of townhouse is proposed within lands designated Low Density Residential 2. Stacked Back-to-Back Townhouse Buildings are not contemplated at all in the BCMDP. Should staff support these uses for Block 18, the District Plan will need to be amended for clarity purposes 39. Staff do not object to removing the complementary uses (government and municipal recreation facility) as these are not planned for this area 40. Staff do not object to removing coach houses and second residential units as permitted ancillary uses 41. One set of zoning regulations is proposed for Apartment Buildings and Stacked Back-to-Back Townhouse Buildings on the basis that they are similar in scale, massing and density. Staff agree with this approach. However, several of the site specific regulations, when compared to the R9 zone (for Apartment Building), are proposed to be modified. Please provide rationale for: a) Reducing the minimum rear yard setback from 7.5 metres to 5.0 metres b) Reducing the minimum low rise residential lot line setback from 7.5 metres to half the height of the building or 4.5 metres, whichever is greater. Note, staff question the applicability of this regulation to Block 18	38(d). The RBC4 zone permits Multi-Unit Residential Buildings, which would include both Stacked Back to Back and Back to Back Townhomes. These housing types provide choice to the community and assist in providing a variety of housing within the Draft Plan of Subdivision and the District. If the District Plan requires updated language to permit this housing types, it can be amended at the same time that Council considers the Zoning Bylaw Amendment and Draft Plan of Subdivision applications – this would be a housekeeping amendment, rather than an amendment specific to this development. 39. Acknowledged 40. Acknowledged 41 (a). The rear yard for Block 18 abuts the hydro corridor/pathway. A reduced rear yard would not impact any of the residential blocks and would more appropriately consider this lot line as more typical of a side yard. 41 (b). The RBC4 zone, as proposed by City staff, includes a regulation requiring a minimum 4.5 metre / ½ the height of the building regulation. We concur that the regulation would not apply to Block 18 41 (c). The RBC4 zone, as proposed by City staff, includes a parking requirement of 1.1 spaces per unit including visitors. 41 (d). The requirement for a minimum amount of amenity has been included. 42. We support the inclusion of the amended wording for height, provided that the measurement of height is from the highest grade on the Block – adjacent to Street Four. 43 (a). The RBC4 zone proposed by City staff includes a minimum 5.0 m Street Line setback 43 (b). See earlier comment – the rear yard abuts the hydro corridor and not another development/residential block

c) Reducing the parking requirements from 1.25 spaces per dwelling unit (1.15 spaces per dwelling unit plus 0.10 visitor spaces per dwelling unit) to a minimum of 1.1 spaces per dwelling unit (1 space/unit and 0.1 space/unit for visitor spaces per dwelling unit) d) Removing the amenity space requirements of 3 square metres for the first bedroom and 2 square metres for each additional bedroom in the dwelling unit 42. A maximum building height of "12.0 metres / 4 storeys" is proposed for Apartment Buildings and Stacked Back-to-Back Townhouse Buildings. This should be revised to "12.0 metres and 4 storeys" to be consistent with the Zoning By-law and the BCMDP 43. One set of zoning regulations is proposed for Back-to-Back Townhouse Buildings and Stacked Townhouse Buildings. Please provide rationale for: a) Reducing the minimum street line setback from 6.0 metres to 5.0 metres b) Reducing the minimum rear yard setback from 7.5 metres to 5.0 metres c) Removing the maximum lot coverage of 40%. As previously noted, staff are reviewing lot coverage regulations applicable to all residential zones 44. Staff are comprehensively reviewing the Back-to-Back Townhouse and Stacked Back-to-Back Townhouse building typologies to determine whether any additional regulations need to be considered. This includes, but is not limited to, the regulations for Cluster Developments found in Section 3.C.10 of the Zoning By-law 45. The setbacks that are required to implement the findings of the noise study should be translated into setbacks from the property line within Block 18, (rather than from the centerline of Conservation Drive) and should account for the required road widening along Conservation Drive. As well, the term "outdoor amenity area", used in proposed Section 7.9.6, is not a defined term in the Zoning By-law which makes implementation problematic. Note, all recommended noise attenuation measures are subject to Regional review and acceptance. Please revise accordingly 46. A site specific regulation is proposed to permit parking between the building line and the lot line abutting Conservation Drive. As noted above, staff remain concerned with building design options that will result in a streetscape that is dominated by parking. Parking areas should not be oriented to or visible from Conservation Drive. Please review and consider alternative designs and/or modifications that would address this concern. For instance, could the units facing Conservation Drive incorporate garages? Also noted previously, consider reducing the number of Back-to-Back units to reduce the parking demand and provide on-site amenity areas 47. The proposed definitions for "Back-to-Back Townhouse Building" and "Stacked Back-to-Back Townhouse Building" are under review	43 (c). the RBC4 zone proposed by City staff does not include a maximum lot coverage 44. The RBC4 zone permits a 'Multi-Unit Residential Building', which would include a Back to Back and a Stacked Back to Back Townhouse Building. 45. The wording regarding the required noise setback has been revised to measure the setback from the lot line 46. The design exercise included reducing the need for and height of any required retaining walls along Conservation Drive. Due to the larger park and resulting shift of Street Four closer to Conservation Drive, the grade difference between Street Four and Conservation Drive is contained within Block 18. The dwellings require driveway access from Street Four and from the south side of the building. An internal driveway, with access to the units and space for visitor parking can only be located between the building and the Conservation Drive frontage. Through the Site Plan approval process, matters related to the screening of the parking areas from Conservation Drive can be reviewed and considered. 47. The existing definition of 'Multi-Unit Residential Building' permits both of those building types – new definitions may not be required.

Residential Mixed-Use 20 (RMU-20) – Block 19 48. This portion of the Draft Plan is designated Mixed-Use Medium Density Residential (within the Node) and Low Density Residential 2 in the BCMDP 49. Previous Blocks 19, 20, and 21 on the original Draft Plan have been consolidated and renumbered as Block 19. The consolidation of these blocks has been advanced, in part, due to the elimination of Street Two (Kawartha Street) connecting to Conservation Drive. Based on the BCMDP, a majority of the lands within the new Block 19 are designated Mixed-Use Medium Density Residential (within the Node), with the remaining lands designated Low Density Residential 2. The entire block is proposed to be zoned Residential Mixed-Use 20 (RMU-20) which does not align with the Low Density Residential 2 designation. Section 3.2.2 of the BCMDP permits minor alterations to the development blocks and local road patterns so long as they remain consistent with the policies and intent of the District Plan, to the satisfaction of the City. Staff agree that the intent of the District Plan is maintained and therefore support this minor adjustment 50. Special Provision Area 37 (SPA 37) of the Official Plan applies to a portion of the subject lands identified as the Beaver Creek Node, which allows for higher densities and building heights, as well as a wide range of uses to create a mixed-use centre with a concentration of neighbourhood-oriented retail, service commercial uses, institutional, employment and residential uses. The majority of Block 19 is within the identified node area. Development permissions applicable to these lands include a maximum building height of 20 metres and a maximum density of 300 bedrooms per hectare 51. SPA 37 of the Official Plan encourages a mix of uses. Staff recommends that a wide range of uses be considered for the portion of Block 19, including commercial, and to develop this block as a mixed-use area, consistent with SPA 37 52. 'Live-Work Building' has been added to the list of permitted uses. This use is identified in the BCMDP as a suitable medium density housing form within the Mixed Use Node. Staff question whether live-work buildings can be accommodated within the zoning framework currently proposed or if separate regulations are required. Please confirm 53. 'Back-to-Back Townhouse Building' and 'Stacked Back-to-Back Townhouse Building' have been added to the list of permitted uses. Comments and concerns noted herein need to be addressed before staff can support these building typologies 54. Staff do not object to the removal of the Townhouse and Freehold Townhouse Buildings from the list of permitted uses, given the density target of 60 – 100 units/ha for this designation as set by the BCMDP 55. Staff do not object to removing the complementary uses (government, municipal recreation facility, and spiritual use) as these are not planned for this area	NOTE – the Zoning has been revised to reflect the City's preference for new zones within the Beaver Creek Meadows community. The lands originally intended to be zoned RMU-20 are now proposed to be zoned Residential Beaver Five (RBC5) 48. The limits of the District Plan boundaries were originally drafted with a different road network. A significant majority of the Block is within the Node. 49. Acknowledged 50. Acknowledged 51. The RBC5 zone permits a mixed-use building. 52. The RBC5 zone would permit a live-work or similar building type. No changes are required. 53. Those building types are considered 'Multi-Unit Residential Building' in the Bylaw, which is permitted in the RBC5 zone. 54. Noted. 55. Noted – however the RBC5 zone permits those uses. We have no concerns with them being included in the RBC5 zone, though we concur they are not contemplated for the subject lands. 56. Noted – neither use is permitted in the proposed RBC5 zone. 57. The RBC5 zone permits a range of ancillary commercial uses consistent with the District Plan. 58 (a) The RBC5 zone proposed by City staff includes a minimum 5.0 m rear yard. 58 (b). The RBC5 zone proposed by the City includes a minimum Low Rise Residential Area setback of half the height of the building or 4.5 metres – we note that this regulation would not apply to the subject lands. 58 (c). Acknowledged

56. Staff do not object to removing coach houses and second residential units ancillary uses based on the types of housing form permitted 57. The applicant may wish to consider additional ancillary uses, subject to appropriate regulations that address location and size. Food Stores are not permitted in the Mixed-Use Medium Density Residential designation 58. Staff have comments, concerns and/or questions with the following proposed regulations contained in Table 7A (applicable to Multi-Unit Residential Buildings, Stacked Townhouse Building and Stacked Back-to-Back Townhouse Buildings) and Table 7B (applicable to Mixed-Use Buildings): a) Reduction of the rear yard setback from 7.5 metres to 5.0 metres. Please provide rationale b) Reduction of the Low Rise Residential Lot Line Setback, from 7.5 metres to half the height of the building or 4.5 metres, whichever is greater. Note, staff question the applicability of this regulation to Block 19 c) Increased minimum building height, from 7.5 metres to 9 metres. Staff supports this modification as it aligns with the BCMDP d) The maximum building height should be provided in metres and in storeys, rather than in metres or storeys, for consistency with the BCMDP e) In addition to the maximum density requirement of 300 bedrooms per hectare, a minimum density requirement of 60 units per hectare should also be included, for consistency with the BCMDP f) Reduction in the residential parking rate from 1.15 spaces/unit to 1.1 spaces/unit (both rates inclusive of visitor parking). While this is not a substantial reduction, rationale should still be provided. In addition, the proposed parking rate is also footnoted in Table 7B, but the footnote has not been provided. Please clarify. g) Specific to Table 7B, the reduction in the non-residential parking rate, from 3 spaces/100 square metres of Building Floor Area, to 2.4 spaces/100 square metres of Building Floor Area. Please provide rationale 59. Proposed Section 7.10.4 should read that "…every BUILDING shall have a front entrance at GRADE…", for consistency with the RMU zone. As well, this provision is duplicated in proposed Section 7.10.8. Staff recommend removing one of these sections. 60. Proposed Section 7.10.5 states that the regulations of the Residential Nine – Activa Conservation Drive Zone shall apply to Stacked Townhouse and Back-to-Back Townhouse Buildings. Staff have two comments: a) There are regulations for Stacked Townhouse within Table 7A. Please clarify which regulations should apply b) The proposed R9 zone requires a minimum density of 150 bedrooms per hectare, whereas the minimum density applicable to these lands is 300 bedrooms per hectare	58 (d). Noted- the RBC5 zone permits 20 metres and 6 Storeys. 58 (e). The Official Plan and Zoning Bylaw regulate density in bedrooms per hectare, not units per hectare. Measuring density in bedrooms per hectare conforms to the Official Plan and is consistent with the other zones in the Zoning Bylaw. 58 (f). The RBC5 zone proposed by City staff required 1.1 spaces per unit, including visitor parking. 58 (g). The RBC5 zone proposed by City staff requires 2.4 spaces per 100 m^2 of non-residential floor area. 59. This matter was discussed with staff and the RBC5 zone includes the requirement that the entrance be provided 'to grade' rather than 'at grade' in recognition that there are grading challenges. This allows for stairs and landings to provide access to individual units in a 'Multi-Unit Residential Building.' 60. The cross-reference to the R9 zone has been deleted. The regulations of the RBC5 zone would apply. 61. The setback has been adjusted to be measured from the Street Line and would apply to an 'Amenity Area', which is a defined term in the Bylaw. 62. See comments applicable to Block 18 – the grade difference between Street Four and Conservation Drive presents challenges and when combined with the noise related setback, surface parking and the internal driveway are required to be located between the building and Conservation Drive. 63. Noted – the cross reference has been corrected within the proposed RBC5 zone 64. The RBC5 zone refers to 'Ancillary Uses' in Section 7.19.1.3 – the reference to 'commercial unit' has been removed.

61. The setbacks that are required to implement the findings of the noise study should be translated into setbacks from the property line within Block 19, (rather than from the centerline of Conservation Drive) and should account for the required road widening along Conservation Drive. As well, the term "outdoor amenity area" used in proposed regulation 7.10.6 is not a defined term in the Zoning By-law, which makes implementation problematic. Note, it appears that this regulation is duplicated in proposed section 7.10.11. All recommended noise attenuation measures are subject to Regional review and acceptance. Please revise accordingly 62. A site specific regulation (Section 7.10.7) is proposed to permit parking between the building line and the lot line abutting Conservation Drive. As noted above (Paragraph no. 46), staff remain concerned with building design options that will result in a streetscape that is dominated by parking. Please review and consider alternative designs and/or modifications that would address the concerns identified by staff. Note, this provision is duplicated in Proposed Section 7.10.12 63. Proposed Section 7.10.9 contains regulations that apply to Ancillary Uses. Reference within this regulation is made to Section "7.10.3". This should read as Section "7.10.1.3 64. Proposed Section 7.10.9 (d) notes the maximum floor area of each "ancillary use", whereas the RMU zone requires the maximum floor area for each "commercial unit". Why the change in terms? 65. Section 7.10.1.5 g.) of Zoning By-law 2018-050 limits the maximum floor area of a Drug Store to a maximum of 1,115 square metres and specifies that only one Drug Store is permitted on a Lot. Consideration should be given to establishing similar regulations in the site specific RMU-20 zone for the Activa lands 66. Section 7.10.1.6 of By-law 2018-050 prohibits drive-throughs on lands zoned RMU. Staff recommend this regulation be included in the proposed site specific RMU-20 zone for the Activa lands 67. At a minimum, buildings along Conservation Drive should be designed to accommodate future main floor commercial uses (minimum ground floor height will be recommended). 68. Proposed Section 7.10.10 removes the maximum street line setback requirement that 75% of the Front Building Façade be within 7.5 metres of the Front Building Façade. Staff are reluctant to delete this requirement altogether, though recognize site conditions (i.e. required noise study setbacks) may present challenges in meeting this regulation. Once the property line setbacks have been provided to implement the noise study, staff will reconsider this regulation. 69. Proposed Section 7.10.13 pertains to structured parking. In subsection (b), reference is made to Section "7.10.12.a)". This should read as Section "7.10.13.a)". 70. The RMU zone contains additional provisions for structured parking (within Section 7.10.10), including subsections (e) which addressed the location of entrances. Why have these provisions been removed?	65. The RBC5 zone permits a maximum floor area of 300 m^2 for each ancillary use – no specific limit has been included for a Drug Store. 66. The RBC5 zone prohibits a drive-through. 67. The RBC5 zone requires a minimum 4.0 m ground floor. The proposed exception would permit a lower ground floor height for some building types that are not conducive to future conversion to commercial uses 68. Due to the noise related setback and the previously discussed challenges with the grade change, the building cannot be located within 7.5 metres of Conservation Drive. 69. Noted- the RBC5 zone contains regulations regarding structured parking. 70. The RBC5 zone, proposed by City staff, contains regulations for structured parking and no changes are proposed. 71. The zoning framework for Beaver Creek Meadows has been discussed with staff, and staff drafted new zones for the District. We have no concerns with the proposed framework, subject to site specific exceptions which are included with this submission.

71. Staff had previously requested that a zoning framework be prepared for staff's consideration that would implement the built form and ancillary use policies 3.4.11 (c), 3.4.12 and 3.4.14 of the District Plan. Please include in the next submission	
Parkland, Trails and Walkways	
72. Staff appreciate the revisions made to the Draft Plan which converted Block 15 (renumbered as now Block 21) as a park block. The location of this parkland aligns with the BCMDP	Noted
73. As previously noted, the Parkland By-law requires a parkland contribution equal to 5% of the net land area or 0.4 hectares for this particular subdivision. The size of the park block is less than the 5% parkland dedication, at 0.306 hectares, which leaves additional land requirements or cash in lieu to equal 5% of the land area	Noted. The intent is provide the balance as cash in lieu of parkland.
74. The walkway associated with the hydro corridor continues to be shown as part of the revised Draft Plan. Staff support this walkway as it is consistent with the Active Transportation network as shown on Map 5 of the BCMDP. Additional comments are provided below	Noted.
75. A walkway connection (Block 20) is shown on the west side of the proposed Draft Plan linking 'Street One' to the adjacent node, and future school block on the adjacent lands. Staff support this walkway as it further enhances connectivity within the community and provides a direct connection to the proposed school located in the adjacent proposed development area	Noted.
76. The design of City sidewalks, trails, and parks shall address all grading and drainage issues to meet AODA requirements. Should additional land or easements be required to accommodate City infrastructure needs, the applicant shall convey such transfers to the City at the time of engineering approval	No such easements have been identified. The requirement for the grading of the sidewalks and parks can be addressed through a condition of draft plan approval
Design Considerations	
77. Development of the subject lands should be consistent with the urban design policies of the BCMDP (Section 4). Generally, the Draft Plan should reflect a complete community with high quality design, a high degree of connectivity, well designed and attractive streetscapes, and a sense of identity	The Draft Plan contributes to a complete community. Matters of building design can be considered through future site plan applications. The requirement for Urban Design Guidelines for

	the Draft Plan can be addressed through a condition of draft plan approval
78. Good urban design principles should be incorporated into the built form, including each dwelling unit type. In particular, townhouses should be consistent with policies 3.4.17 – 19 of the BCMDP, and low-rise apartments (and stacked back to back townhouses) should be consistent with policies 3.4.21 – 3.4.24 of the BCMDP. The design of low-rise apartments and stacked back to back townhouses should also complement and enhance the surrounding neighbourhood character	The design of the buildings can be reviewed through future site plan applications.
79. The development as a whole should be consistent with the City's Urban Design Manual	The development is consistent with the Urban Design Manual, taking into consideration site context and the specific characteristics associated with the grade change from Street Four to Conservation Drive
80. An Urban Design Brief was not submitted. Subdivision Urban Design Guidelines will be required as a condition of draft approval	Noted
Roy Schmidt Road	
81. As noted in previous correspondence, Roy Schmidt Road is to have a road allowance width of 18 metres. The right of way limits will need to be surveyed, to measure 9 metres on either side of the historic centre line of the road. This will require the applicant to convey a road widening to the City of approximately 3 metres on the east side of Roy Schmidt Road. Modifications have been made to the Draft Plan, reducing the widening from 4 metres (shown on the original Draft Plan) to 3 metres, and limiting the extent of the widening to between Street Four and Block 20 (Walkway)	Noted – The Draft Plan continues to show the road widening as part of the continuation of Street Four
82. The applicant shall coordinate the design of Roy Schmidt Road and cost-sharing of the reconstruction with the applicant/developer of the lands on the west side of the road (Draft Plan 30T-16402), including a new multi-use trail extending from Conservation Drive to the City of Waterloo boundary north of Pinery Trail. This will be a condition of draft approval	Noted

83. In previous comments, staff noted that a portion of Roy Schmidt Road adjacent to Block 19 is to be closed. In response to this comment, the Draft Plan was revised to include a notation to the same effect. Staff ask that the Draft Plan be further modified as follows: • The limits of the closed portion of the roadway should be clearly delineated • The notation on the Draft Plan, which refers to 'Roy Schmidt Drive,' should be changed to 'Roy Schmidt Road.' • The closed portion of the roadway should also be labelled as a multi-use trail	• The Draft Plan shows the extent of the road to be closed • The notation has been corrected • The closed portion has been labelled as a multi-use trail – see additional comments regarding grading challenges
84. Block 24 shall contain a turning circle until such time as Roy Schmidt Road has been constructed to an urban cross-section	Block 24 contains a temporary turning circle
85. The registration of Blocks 1, 2, 3, and 24 will be conditional upon the construction of Roy Schmidt Road to an urban cross-section	Acknowledged
Other	
86. What is the purpose of the 12.5 easement shown within Block 19, between Street Four and Conservation Drive?	The proposed easement is for storm and sanitary servicing to Street Four as this is the proposed low point for the site. The ultimate easement location and width will be confirmed through detailed design or at Site Plan Approval
87. If Phasing of the development is proposed, please submit a Phasing Plan	Phasing is not proposed
88. Some of the lands (Block 1, 6 and part of Blocks 2, 5 and 7) are within the limits of the Conservation Meadows District Plan. Please review and confirm conformity with the District Plan	The surrounding lands in Conservation Meadows are developed with single detached dwellings. The residential units in Blocks 1, 6 and the adjacent parts of 2, 5 and 7 are also planned for single detached dwellings
Engineering Comments	
90. The applicant shall coordinate the design and construction of servicing the lots fronting onto Roy Schmidt Road with the owner/applicant of the lands on the west side of the road (Draft Plan 30T-16402)	Noted.

91. The Beaver Creek Road Sewage Pumping Station must be in place prior to final registration and issuance of any building permits 92. The Communal Stormwater Management (SWM) Facility must be constructed prior to servicing the subdivision for stormwater quality control	Noted.
93. Review of the Communal SWM Facility Report prepared by MTE Consultants has not been fully completed. Any comments resulting in revisions, changes, or modifications to that Report, which effect this Draft Plan, must be adhered to	The lands that are proposed to contain the facility were conditionally approved through a consent application. The design of the facility is supported by staff in principle and staff comments are being addressed separately. We understand the comments have been addressed and that only minor details remain.
94. The Beaver Creek Road and Conservation Drive Reconstruction Project is currently in the design phase. In principle, conveying the 100-year design storm less the 100-year pre-development flow via storm pipe along Conservation Drive and Beaver Creek Road is acceptable. However, it shall be noted that storm pipes must generally be upsized one to two sizes to accept this flow. Overall impacts to the Beaver Creek Road and Conservation Drive Reconstruction Project are being determined. The City of Waterloo reserves the right to request an onsite temporary SWM facility to handle water quantity control, as per the NWSSS, if upsizing of storm pipes along Beaver Creek Road and Conservation Drive is determined to not be feasible	Noted.
95. Block 19 may be slightly impacted by City right-of-way needs with respect to the future roundabout at Conservation Drive and Beaver Creek Road	Noted.
96. The Conceptual Grading Plan shown in Appendix B of the Functional Servicing and Stormwater Management Report (revised May 2020) must be updated to reflect the current Draft Plan. Notes: (1) Engineering staff have received an Updated Conceptual Grading Plan reflecting current Draft Plan via email from Joe Grubb, dated January 11, 2021; and (2) within the legend of the Updated Grading Plan, a symbol and corresponding text is provided for "Existing Contour (City of Cambridge)". The text should read "City of Waterloo	Noted. The Grading Plan as well as the Functional Servicing and Stormwater Report are updated to reflect the current Draft Plan. Reference to City of Cambridge has been updated to reflect City of Waterloo.
97. The approach to infiltration outlined in the supplemental information package provided by Joe Grubb via email on January 7, 2021 is acceptable. In general, the City's preferred method of infiltration is a third pipe system within the City right-of-way (as utilized in the Vista Hills Subdivision on the west side of Waterloo). However, given the prevalence of high seasonal groundwater and steeper roadway designs, individual lot level infiltration galleries located within the City's right-of-way are acceptable	Noted

98. Engineered infiltration systems proposed within Blocks 18 and 19 (Multiple Residential Blocks), along Conservation Drive, will be reviewed in greater detail as part of the site plan approval process. This will include the proposed location of the infiltration systems, among other matters	Acknowledged
99. As noted above, Blocks 11 and 12 are shown in the Functional Servicing and Stormwater Management Report (last revised May 2020) and Revised Grading Plan (last revised April 17, 2020) as larger lots intended to accommodate a single detached or semi-detached dwelling. However, these blocks are identified on the Draft Plan as Street Towns. If these blocks are intended to accommodate townhouses, the proposed infiltration approach should be reviewed and the Storm Servicing Concept Plan (Figure 13) should be updated	Noted. The Grading Plan as well as the Functional Servicing and Stormwater Report are updated to reflect the current Draft Plan.
100. For Blocks 13, 15, 16, 17 and 24: The Ontario Building Code (OBC) requires a minimum building setback of 5 metres from infiltration galleries. This setback is regardless of property lines. Based on the current lot configuration, the rear yard infiltration galleries within these blocks abut the side yards of several lots intended for a single detached or a semi-detached building. The site specific zoning will need to reflect the minimum 5 metre setback for all lots that are adjacent to an infiltration gallery (within Blocks 3, 4, 7, 8, 9, 11, and 12). Roof water will be discharged to grade within the rear yards, and the water will be conveyed via swales to infiltration galleries within the City's right-of-way. The City will require easements over all swales and/or catchbasins on private property. This will be made a condition of draft approval	Noted. The revised design has removed rear yard galleries in locations where a rear yard backs onto a side yard.
101. Engineered infiltration systems within the rear yards at townhouse Block 14 will be acceptable due to the adjacent developed park, and the desire to maintain existing trees near the park / Block 14 boundary	Acknowledged
102. Water Balance shall be revisited during detailed design to ensure that the NWSSS target infiltration conditions are met	Noted
Transportation and Active Transportation Comments	
103. The Draft Plan has been revised by eliminating the road connections of Street Two (Kawartha Street) and Street Three (Cranberry Street) to Conservation Drive. Staff generally support this alternative road design	Noted.

104. As noted in previous correspondence, a Transportation Impact Study (TIS) is required, to be prepared by a qualified Transportation Engineer, for the review and approval of the City's Director of Engineering. The study should address the needs of all road users, including pedestrians, cyclists, transit users, and drivers, and should account for active subdivisions and their current unit counts. The study shall be prepared in accordance with a Terms of Reference that has been agreed upon by City Transportation staff. For further information about the study requirements/terms of reference, please contact: Chris Dedman, Transportation Services, City of Waterloo (519-747-6072 or chris.dedman@waterloo.ca). This study is required prior to draft approval	A comprehensive Transportation Network Study (TNS) was prepared by Paradigm Transportation Solutions and submitted to the City for approval through the Northgate/Kartway Draft Plans of Subdivision. That Study considered the development of the subject lands as well as the broader context of all proposed development within the Beaver Creek Meadows District.
105. A Traffic Management Plan is also required and shall include options and recommendations for enhanced pedestrian and cycling safety, recommend appropriate traffic calming and safety measures, and provide an on-street parking plan. While the applicant has indicated that completion of this Plan could be made a condition of draft approval, staff recommend that the Plan be completed prior to draft approval. This will ensure that considerations and design measures are integrated into the Draft Plan, and safety and parking measures are considered early in the design phase. Traffic management and calming should be coordinated with the existing development to the north and east, and with the proposed new development to the west	A Traffic Management or Traffic Calming Plan can be required through an appropriately worded condition of draft plan approval.
106. The concept plan contained in the Revised Functional Servicing Report shows slip-off parking adjacent to the Block 21 (the park block) along Street Four (Gary Cowan Drive). Transportation staff do not support the proposed slip-off parking	Noted. The Grading Plan and the Functional Servicing Report has been revised to remove the slip-off parking.
107. Please ensure that daylight triangles are shown on the Draft Plan at any intersection with Conservation Drive, post-road widening	No new intersections with Conservation Drive are proposed. The existing intersection with Rideau River Street is shown on the Plan.
108. Please ensure appropriate coordination between the lighting plan for the proposed Draft Plan and the lighting plan for Conservation Drive	The requirement for a street lighting plan can be addressed through a condition of draft plan approval
Parks Comments	
109. The following comments are based on the Draft Plan of Subdivision (MHBC Planning, last revised June 24, 2020) and a Revised Conceptual Grading Plan (Stantec Consulting Ltd., April 17, 2020) obtained from the City's	

Planning and Engineering Departments in March 2020. These comments are to be used as guidance for the Grading Plan and Concept Plan for the park and trail blocks. A comprehensive review will be undertaken once a complete package is received which includes a Park Concept Plan. The applicant should refer to the Landscape Design Process & Requirements Manual for City requirements	
(a) Park blocks are to be developed at 80% at 2% grade, and the remainder could be up to 6% and should be sized to accommodate both active and passive facilities. Staff do not support a 3:1 slope through the centre of the park block. Please ensure appropriate coordination between the Park Concept Plan and the Grading Plan	The pack block has been regraded to have a 4:1 slope adjacent to Street Four and 2% grades for the remainder of the block per discussions with City Staff.
(b) Staff strongly encourage the applicant to construct the park/open space development after the issuance of the first building permit and in the early phases of construction	Noted.
(c) The following is the required programming to be accommodated in the park: i. Full size basketball or multi-use court located on the west side of the park block to accommodate future ice rink. ii. Flat open area that can accommodate a variety of activities or play. Maintain 1-2% slope for positive drainage that feathers into the existing park. iii. Age appropriate play elements for children 12-18 years old such as game tables, a climbing wall, chess tables, etc. iv. Seating and rest areas with shade located in key locations	Note – Park Block 21 is to be combined with the existing park in the Conservation Meadows subdivision to the north. The noted programming would need to be coordinated with the existing park, owned by the City.
(d) Provide shade in the playground areas and seating areas. The provision of shade for park areas is of concern to the City and must be provided in and around areas where people sit, children play, etc. The applicant is to note the City concern and address the provision of shade in a meaningful way	The requirement for a Park Plan can be included as a condition of draft approval.
(e) The park must be unencumbered and for recreational purposes only. Infrastructure is not permitted in the park unless required by the park	Noted – infrastructure is not proposed within the park.

(f) The City does not support infiltration galleries within the park block. If any infiltration galleries are proposed to be located in part or fully within the park block, the applicant must identify such location(s) and provide compelling justification for staff's review and consideration	Noted. Infiltration galleries in the park block are not proposed.
(g) Parks should not drain towards the back yard of private properties	Noted – the park generally drains in the southern direction to Street Four.
(h) Show the storm water, hydro and water stub at park frontage property line (Street Four/Gary Cowan Dr.) for the future ice rink. Ensure this is coordinated with the Engineering Plans as it will be installed with the overall servicing	Noted – this can be included as a condition of Draft Plan Approval and addressed at the detail design stage.
(i) Topsoil cannot be stockpiled within the park block	Noted – Topsoil will not be stockpiled on the Park Block.
(j) A discussion with the City and the applicant should take place to determine the best approach for the vegetated buffer along the shared property line between the two park blocks. Trees determined in poor or hazardous health should be removed. Additional trees shall be planted to enhance the existing property line buffer planting and be designed to address the overall park design. Not as a means to define the property line edge. The new park should blend with the existing park to create an overall campus effect	Acknowledged – the requirement and approval of a Park Plan can be included as a condition of draft approval
(k) Dog waste unit may be required to divert from Molok system. City to confirm	Noted.
(l) All sidewalks and trails shall address grading and drainage issues to meet AODA requirements. Staff do not support the 8.2% trail connection from Street Four to Conservation Drive (Block 23)	Through discussions with City Staff, it has been concluded that given the elevation differential across the site, an AODA compliant trail connection from Street Four to Conservation Drive cannot be provided. Furthermore, best efforts have been used to design a meandering trail with an average slope of 7.4% as discussed with City Staff during the meeting on May 31, 2024.
(m) The trail connection from Roy Schmidt Road to Conservation Drive must be coordinated with the adjacent lands (Draft Plan 30T-17403). Staff do not support a 9% slope as shown	Noted – this trail design is being coordinated with the adjacent developer. As discussed during the site meeting on May 31, 2024 and email correspondence with City Staff, it is our

	opinion that this trail connection is not necessary given the close proximity to the trail from the hydro corridor and the pedestrian connection at the future roundabout in the Cook Mattamy Subdivision. As this trail is located outside of the limits of our Draft Plan and the specifics are still being worked out, we have removed this trail from our design.
(n) Extend the existing trail along the hydro corridor. Trails must be 3.0 m width asphalt, as per City Standard Detail	Noted. Trail extension through the hydro corridor to the current terminus is shown on the proposed grading plan.
(o) In all situations where a proposed trail intersects a street, show the transitional node area as per City of Waterloo Detail W-606 of the Landscape Design Process & Requirements Manual, with bollard gates, curb cuts, and trail signage	The design of the trail can be addressed through a condition of draft plan approval
(p) City standard property demarcation posts and living fences must be shown on the plans at all public private interfaces	The requirement for the demarcation posts can be addressed through the subdivision agreement
Environmental Comments	
110. In previous comments, staff identified that monitoring of the remaining wells (BH 12, BH 104 and BH 105) needs to continue through pre-, during and post-construction, consistent with the City's Development Monitoring Protocol and the recommendations of the Hydrogeological Assessment. The details of each phase will be determined at the transition point (e.g. inclusion of the LID measures as part of the during construction phase). In response, the applicant has noted that approval of a pre-, during and post construction monitoring program can be addressed as a condition of draft plan approval. Staff agree	Noted.
111. In previous comments, staff identified that the subject property is partly located within a Wellhead Protection Area C where the vulnerability is equal to 4 and partly within a Wellhead Protection Area D where the vulnerability is equal to 2. There is no Issue Contributing Area associated with W5A. While Schedule D of the Grand River Source Protection Plan indicates that the DNAPL policies are applicable to the area, based on the vulnerability scores, it appears the only applicable policy relates to the Region developing and implementing an education and outreach program. This was acknowledged by the applicant. At this time, City staff also wish to	Noted.

advise that the Minister of the Environment, Conservation and Parks approved an update to the Grand River Source Protection Plan which took effect on October 1, 2020. Based on these amendments, there appears to be no mapping or policy changes that effect the Activa lands	
112. In previous comments, staff noted that the low permeability of the clayey silt to silt soils at surface, and potential for shallow perched water levels, may limit the amount of recharge augmentation that can occur through LID. In response, the applicant has indicated that an updated infiltration strategy, addressing this comment, was submitted in support of the revised Draft Plan of subdivision. City staff also received a Technical Memo prepared by MTE on the Communal SWM Facility, dated February 3, 2020. The Technical Memo sets out the infiltration target for Activa as 281.6 mm/yr. Stantec is proposing an infiltration volume of 285 mm/yr. Stantec's proposal is in line with the direction set out in MTE's Technical Memo. Staff are actively reviewing engineering and zoning aspects related to the proposed stormwater management strategy to ensure there is consistency amongst area subdivisions where possible, while recognizing the unique characteristics within each draft plan	Noted
113. In previous comments, staff questioned whether dewatering has the potential to impact natural features since it was noted that the groundwater flow from the site may contribute baseflow to nearby creeks and wetlands (described in Section 4.2 of the Hydrogeological Assessment). In response, the applicant has indicated that this will be addressed as part of the required dewatering permit and as a condition of draft plan approval. Staff have no further comments at this time	Acknowledged
114. In previous comments, staff questioned how the functionality of the trenches will be ensured under private ownership. In response, the applicant has suggested that draft plan conditions be imposed: (a) requiring that the developer be responsible for the installation and certification of individual trenches within single lots, and (b) addressing management of infiltration trenches, to be secured through the City's Residential Subdivision agreement. The applicant has further suggested that the management requirements can also be carried forward as a condition of site plan approval with easements, as appropriate, conveyed at that time. Staff generally concur with this approach, subject to further review of the infiltration systems within the multi-blocks along Conservation Drive at site plan, and securing construction and management requirements and all necessary easements	Noted.
115. In previous comments, staff identified that, as per the direction provided by Specific Provision Area 37 of the City's Official Plan (11.1.37), the incorporation of sustainable design elements in the Node is encouraged. This includes, but is not limited to, the standard to which buildings are constructed, the inclusion of LID measures and	Noted.

water efficient landscaping as well as energy production and conservation. In response, the applicant suggests that such consideration be made as part of the site plan approval process. Staff agree	
Waterloo Fire Department	
116. The subdivision will be required to meet applicable fire safety standards, such as the Ontario Building Code and the Ontario Fire Code	Noted.
Grand River Conservation Authority	
Based on the comments provided below, GRCA staff are now in a position to recommend draft plan approval with the following conditions:	GRCA recommends approval – no concern with their recommended conditions.
1. Prior to any grading or construction on the site and prior to registration of the plan, the owners or their agents submit the following plans and reports to the satisfaction of the Grand River Conservation Authority: a) A detailed stormwater management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual". b) A detailed Lot Grading, Servicing and Storm Drainage Plan. c) An Erosion and Siltation Control Plan in accordance with the Grand River Conservation Authority's Guidelines for sediment and erosion control, indicating the means whereby erosion will be minimized and silt maintained on-site throughout all phases of grading and construction. 2. GRCA staff also noted that the City should ensure the Subdivision Agreement between the owners and the municipality will contain provisions for the completion and maintenance of the works in accordance with the approved plans and reports noted in Condition 1) above. 3. GRCA staff can issue clearance of the subdivision once the above has been met	These matters can be addressed through conditions of draft approval.