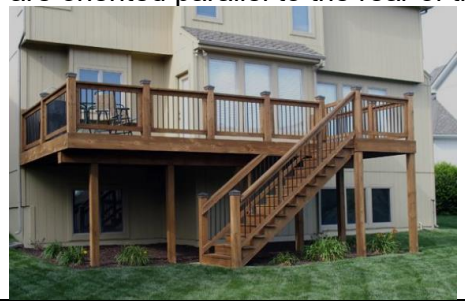
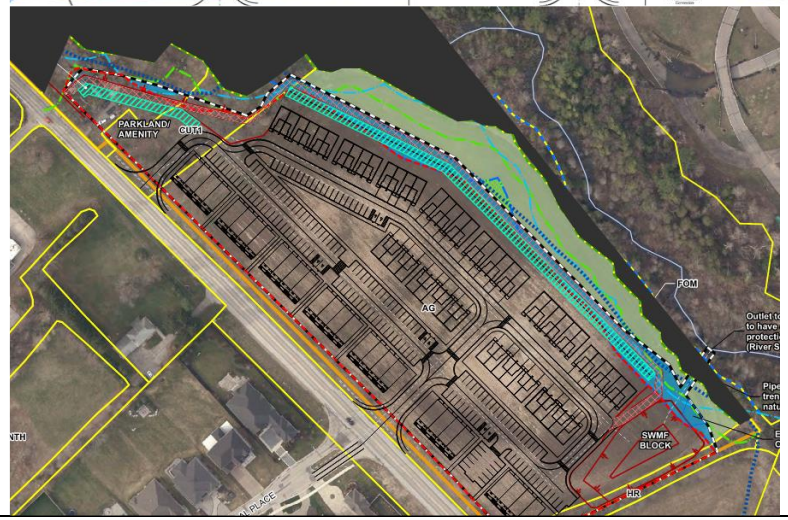
	720 Erbsville Road Post Circulation Comments 3rd Submission File: 0977D	
#	**Comments**	**Responses**
	City of Waterloo	
	1. Planning	
	1.1 Trail Connection	
1	Should the proposed trail remain in condo ownership a public access easement over the trail will be required at the detailed site plan stage. The provision of trail system within the Erbsville South Block Plan is meant to provide recreational opportunities for all of the residents within the Erbsivlle South Block Plan and the general area surrounding the Erbsville South Block Plan.	Acknowledged
2	Staff are considering the inclusion of a Site Plan directive with the future staff report requiring a public access easement over the proposed trail.	Acknowledged
	1.2 Sidewalk Along Erbsville Road	
3	Regional staff have advised that the Erbsville Road reconstruction project has now been pushed back to 2030. It has also been confirmed that the reconstruction will include sidewalks where none exist.	Acknowledged
4	The appropriate design and location of the sidewalk adjacent to the subject site, along Erbsville Road, can be determined through the detailed Site Plan design stage. If the proposed development proceeds prior to the commencement of the Erbsville Road reconstruction project a sidewalk along Erbsville Road will have to be incorporated into the proposed development to ensure the safety of the residents and children accessing any congregated school bus pick up and drop off location.	Acknowledged
	1.3 Record of Site Condition	
5	As noted in the City's post circulation comments dated April 17, 2023 and May 15, 2024, if the Record of Site Condition (RSC) and MECP acknowledgment letter are not submitted staff will be recommending a holding provision to secure these outstanding items.	Additional follow-up is needed from City staff to confirm this requirement.
6	To clarify, the Record of Site Condition has been requested because 720 Erbsville Road is considered to be adjacent to a contaminated site (Erbsville Kartway – high potential) under the Region's Implementation Guideline for site contamination and development applications. Based on the Guideline, a Record of Site Condition (RSC) is required for the 720 Erbsville Rd.	Acknowledged
	1.4 Requested Zoning Amendments	
7	1.4.1 Residential Eight (R8) Zone	Acknowledged

	Based on our discussion during our June 3rd, 2025 meeting, it was the applicant's preference that the SWM pond be zoned R8 to allow for flexibility during the detailed Site Plan stage to accommodate the additional SWM pond design requirements outlined by Development Engineering and Landscape Architecture staff (please refer to Development Engineering and Landscape Architecture comments for details).	
8	In your resubmission letter please include the above noted change in your updated zoning by-law amendment request and submit an updated zoning schedule that includes the SWM pond within the R8 zone (excluding any portion within the buffer limit, which should remain OS3).	Please refer to the revised Planning Justification Report Addendum and zoning scheduled.
9	As discussed, if additional amendments are required (e.g. an increase in density due to the SWM access conveyance) please clearly identify them within your resubmission letter and for consistency within the updated Concept Plan data chart.	Please refer to the revised Planning Justification Report Addendum and concept plan.
10	1.4.2 Deck Setback Staff continue to have concerns with the requested amendment to allow decks to be located up to 2 metres from the rear lot line, leaving only 2 metres for landscaping. Based on the Deck regulations the stairs can further encroach into the rear yard beyond the deck (3.D.2.5) potentially only leaving about 1 metre for access and landscaping in the rear yard if the stairs are oriented parallel to the rear of the deck, see below image for example. 	Please refer to the revised Planning Justification Report Addendum.
11	1.4.3 Sheds and Fences Requested site specific provision to prohibit accessory buildings and fences within a yard which abuts a public highway.	Acknowledged.
12	Staff are of the opinion that this amendment is not necessary, as per 3.A.1 c.) accessory buildings and accessory structures are prohibited within the front yard and flankage yard. The front yard for the subject site is considered to be along the Erbsville Road frontage.	Acknowledged, please refer to the revised Planning Justification Report Addendum.
13	Fences are regulated by the City of Waterloo's Fence By-law therefore a zoning by-law amendment through Zoning By-law 2018-050 to regulated fencing is not appropriate. Further, this site is not back lotted, it has frontage on Erbsville Rd therefore a substantive fence would not be permitted by the Fence By-law in the front yard. The maximum height limit is 3 feet tall for a decorative fence in the front yard.	Acknowledged, please refer to the revised Planning Justification Report Addendum.
	1.5 Comments of Clarification	

14	1.5.1 Lands to the South The Planning Justification Report Addendum (top of page 2) refers to the lands to the south being “zoned for medium to high density residential uses subject to a holding provision”. Please note that the lands to the south are zoned R8 similar to the requested zone on the subject lands. The R8 zone is considered to be a low density residential zone permitting townhouses, stacked townhouses and triplexes. Please refer to the Zoning By-law definition of a Low Rise Residential Area, which includes the R8 zone.	Acknowledged.
15	1.5.2 Parkland Dedication With respect to the applicant’s response in the comment matrix that the environmental lands would be severed from the development area through a reference plan at the time of site plan approval. Please note that the subject lands are not exempt for the consent process, unless the intent is to convey the environmental lands to the City the environmental lands cannot be severed through a reference plan through the site plan approval process. A consent application would be required to be submitted to the Committee of Adjustment if the intent is to sever the environmental lands from the rest of the site and at the time of the severance application the City would require parkland dedication for the subject lands as per section 53 (13) of the Planning Act.	The environmental lands will be conveyed to the City.
16	The City is satisfied with the proposed parkland dedication as shown on the latest concept plan provided that the environmental lands are conveyed to the City for long-term protection through municipal ownership. To reiterate from section 3.1.1 of the City’s May 15, 2024 post-circulation comments, if the environmental lands and their associated buffers are not conveyed to the City then the City’s parkland dedication by-law requires that the parkland dedication requirement be calculated using the gross land area. Any additional parkland dedication would be owed in accordance with the City’s Parkland Dedication By-law and Planning Act, to be satisfied in a manner acceptable to the City. To be clear, the City’s preference is for land dedication, however we reserve the right to accept alternative forms of dedication at our discretion.	The environmental lands will be conveyed to the City.
17	There is inconsistency between the parkland dedication area shown on the Zoning Schedule (0.22 ha), the Concept Plan (0.19 ha) and the Grading and Servicing Plans (0.268 ha). Please review and as part of your OPA/ZBA resubmission please ensure the updated Zoning Schedule and Concept Plan are consistent and show the correct parkland dedication area. The Zoning Schedule appears to include the Erbsville Rd regional road widening, which should not be included in the parkland dedication area. The Engineering Plans should be updated as part of the future Site Plan submission to ensure consistency between the plans.	Please refer to the revised Zoning Schedule and Concept Plan.
	1.6 Regional Road Widening	
18	Should the Region of Waterloo require an additional road widening on Erbsville Road above and beyond the 2.1 m road widening shown on the most recent Concept Plan, the updated	Please refer to the revised Concept Plan.

	road widening requirements should be incorporated into the resubmitted updated concept plan and any additional amendments identified in the resubmission.	
	1.7 Site Data Chart	
19	If the Concept Plan is updated as part of your resubmission please ensure the data chart is updated with the total parking spaces required and proposed. The data chart currently includes the 4 separate required parking categories but no total parking space number for the site. This may cause confusion to members of the public and members of Council as we move forward to the Formal Public Meeting.	Please refer to the revised Concept Plan.
	1.8 Draft Plan of Condominium Application 30CDM-22408	
20	Development planning staff will provide specific comments on the submitted Draft Plan of Condominium application once an updated Draft Plan of Condominium has been submitted.	Acknowledged.
	2. Environmental	
21	As stated in the Comment Matrix, the owner does not intend to convey the environmental lands (i.e. natural features and buffers) into public ownership. While it remains the City's preference that the environmental lands are conveyed into public ownership, if they remain in private ownership, the infiltration swale and trail should be included within the limits of the condo and maintained by the condo. Staff note that the Comment Matrix states that "the trail is proposed to form part of the condo" and that "where the trail crosses the proposed parkland, it can be conveyed to the City with the Park if required". For the SWMF's outlet pipe, Environmental Planning staff understand that Engineering Services staff are requesting that it and the lands south of it, which include the emergency overflow, are owned by the City as part of the SWMF. Environmental Planning staff support this approach since ownership by the condo would further fragment the ownership of the natural features, which would be contrary to Official Plan policy 8.2.2(15), and various easements and agreements would need to be in place for access and maintenance. Further, a portion of the outlet pipe is within Stage 2, Block 2 of 30T-17402 (Erbsville Kartway). Per the draft plan conditions, Stage 2, Block 2 is to be conveyed to the City immediately following registration of the Stage. Accordingly, the current landowner and the City, as the future landowner, need to be accepting of the proposed outlet pipe. An additional comment related to the outlet pipe is provided below.	The environmental lands will be conveyed to the City.
22	While the applicant has indicated that the park and SWMF will ultimately be City-owned, the broader limits of the condo are unknown at this time. If the environmental lands are to remain in private ownership, from a natural heritage perspective, and to address Official Plan policy 8.2.2(15), the limits of the condo should generally be the dripline of the woodland, as roughly shown below on two different images with a dark grey overlay. This would ensure the ownership of the natural features is not further fragmented, consistent with Official Plan policy 8.2.2(15), and that the landscaping and maintenance of the buffer, as approved through the Site Plan process, rests with the condo.	Acknowledged. The environmental lands will be conveyed to the City.

	 	
23	Stormwater management methods have been changed to include an outlet pipe that extends into the woodland, wetland, and ESPA, which are Core Natural Features, and into Significant Wildlife Habitat and Laurel Creek, which are Supporting 'A' Natural Features. Per City Official Plan policies 8.2.4(3) and 8.2.5(3), development or site alteration within such features is only permitted in limited circumstances, including (c) essential infrastructure for which no other alternative is feasible and where crossings and the area of disturbance will be minimized. To address this policy, a supplementary memo should be prepared that confirms there is no other feasible alternative for the outlet, especially because it requires infrastructure to be built on another landowner's property, by identifying the alternatives that were considered and outlining their feasibility from a technical, environmental, and/or financial perspective.	See included memo from JPE dated July 7, 2025.
24	No specific edits are needed, however, the 'Limit of Residential Zone' shown on Maps 6 and 7 of the EIS Addendum does not align with the 'Limit of Residential Zone' shown on the Concept Plan or the ZBA Schedule. Also, the area of buffer reduction indicated on Map 7 of the EIS Addendum is 0.31ha, while the area discussed within Section 2.2 is 0.27ha.	Detailed plans for the Site Plan submission will ensure consistent line work.

25	On April 17, 2025, the Province released proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025. If the proposed changes are enacted, NRSI/the Applicant should review the relevance of Blanding's Turtle Category 3 (movement) habitat, Black Ash habitat, and/or Hoary Bat and Eastern Red Bat habitat to determine if the approach should/may be modified at the detailed design stage.	Acknowledged.
26	Section 3.2 of the FSR states that site grading will match into the existing buffers and that the buffers will remain as existing with limited exceptions for the outlet pipe and portions of the infiltration swale. No specific edits are needed, however, staff note that grading will be required to accommodate the trail, the majority of which is located within the buffers.	Acknowledged.
27	Section 3.2 of the FSR states that no grading will occur within the floodplain, however the Concept Plan within Appendix A and Functional Grading Plan within Appendix B shows the limit of grading within the floodplain northeast of the SWM pond and associated with the trail. Any grading within the floodplain will need to be supported by GRCA.	Acknowledged. We note that GRCA has accepted the functional design.
28	No specific edits are needed, however, Section 3.3 of the FSR appears to mistakenly state that Oil Grit Separators will be located at the SWMF's outlet.	Acknowledged.
29	Section 4.3 of the Urban Design Guidelines states that the "trail network and park will be designed to incorporate the principles of CPTED, by locating near buildings to promote natural surveillance, providing clear sight lines and providing adequate lighting." It is unclear whether trail lighting is proposed but from a natural heritage perspective, given the recommendations of the EIS Addendum (page 19), and that it is not a City standard to light trails, trail lighting should be avoided.	Acknowledged, lighting will not be included in the trail design.
30	Staff appreciate the acknowledgement that a TOR for During- and Post-Construction Development Monitoring will need to be prepared during the Site Plan process.	Acknowledged
	3. Development Engineering	
	3.1 Zone Change Comments	
31	Proposed stormwater outlet pipe crosses into the adjacent property (675 Conservation Drive). a) The City requests a written acceptance by the owner of 675 Conservation Drive to have the outlet pipe and riprap installed on their property and acceptance of associated easement in favour of the City for access and maintenance purposes. i. City has received GRCA recommendation for conditional approval of the draft plan of condominium, and approval of the official plan / zoning bylaw amendments b) The City requests acknowledgement from the developer regarding the transfer of the stormwater management pond, the stormwater management maintenance access, and the portion of the property containing the proposed stormwater outlet pipe extending to the south property line to the City of Waterloo.	Acknowledged. We are working on the acceptance. The landowner acknowledges the stormwater management pond and the outlet will be conveyed to the City. The maintenance access may be addressed by way of easement in favour of the City or conveyance to the City. Consideration will need to be given on how conveyance may impact future connections to adjacent lands.
	3.2 General Comments for Detailed Design (Site Plan Submission)	

32	3.2.1 Functional Servicing Report a) Report describes the use of infiltration galleries, with a detail provided on the Functional Servicing drawing. Infiltration galleries are not represented on the servicing plan. b) Infiltration swale shown in proposed municipal park block. Is this infiltration swale critical to stormwater management of residential development? Refer to City of Waterloo Landscape comments for further information. c) City of Waterloo Stormwater Operations will require the maintenance access be extended from Erbsville Road, along the north side of the proposed SWM pond, past the SWM pond weir, to the south property line of 720 Erbsville Road. i. For maintenance access specifications please refer to City of Waterloo Standard Detail CW-501 located in the City of Waterloo Engineering and Landscape Manual. ii. Adding the maintenance trail to the existing stormwater pond design may alter the proposed stormwater retention capacity. iii. City of Waterloo will require staging areas for equipment and material during pond maintenance/cleanout operations. Easement agreement to occupy parking spaces may be an option. iv. Proposed SWM pond designed with 3:1 slope immediately adjacent to the trail. City of Waterloo Engineering and Landscape Manual requires a 3.0m buffer between trails/pathways and embankments, incorporating a 1.0m mow strip adjacent to the sidewalk/trail. Refer to City of Waterloo Landscape comments for further information.	Acknowledged. As the City notes, these comments will be considered and addressed during Site Plan Approval.
	4. Landscape Architecture	
33	Please note that the comments below are intended to be addressed through future submissions and during detailed design. Revisions are not required to facilitate the OPA/ZBA requests.	Acknowledged
34	Based on the Proposed Ownership overlay map, the trail outside of the park block will be in “Condo/Private” ownership while the lands within the proposed Residential zone will be under “Condo” ownership. As the infiltration swales, trail, and buffers are part of and a result of the proposed development, they should be under Condo ownership as well, rather than being privately owned by a third party.	Acknowledged
35	Based on the ownership and zoning overlay maps provided, the trail outside of the park block will be in “Condo/Private” ownership. The overlays do not clearly demonstrate that the trail and buffer will be under condo ownership and not privately owned by a third party.	Acknowledged
36	There is a detail found on the Grading Plan within the functional Servicing Report (FSR) for Lot Level Infiltration Gallery. Please clarify where the infiltration gallery/galleries are proposed.	These galleries will be placed throughout the development, adjacent to the proposed buildings, to collect and infiltrate roof water.

		Locations will be designed during the Site Plan Approval stage.
37	The FSR shows a large infiltration swale within the proposed municipal park block. Further information about the swale will be required during detailed design/site plan. Is the infiltration swale within the park block critical to accommodate the development? Could the cultural woodland withstand this amount of water if the infiltration swale were removed from the park block or is it required for wetland water balance? Please see further comment from Parks staff relating to encumbrances within park blocks.	Acknowledged. To be addressed in final design. Note that we concur that given the relatively small area of the park and its pervious nature (and hence low runoff), the swale could be eliminated and stormwater could instead be sheet drained northeasterly to naturally infiltrate.
38	The proposed trail is shown as 1.8m wide in the Urban Design Guidelines and 3.0m in other submission material. The proposed trail is shown around the SWM Pond in the Urban Design Guidelines but not on other plans. Revisions are not required for this now, but please ensure future submissions are coordinated.	Acknowledged
39	Staff are concerned about the 3:1 slope directly adjacent to the proposed sidewalk near the Stormwater Management Pond. There is a 2.4m elevation difference from the sidewalk to the bottom of the slope. Per City of Waterloo standard (found within the Comprehensive Engineering and Landscape Manual), there shall be a minimum 3.0m buffer between any trail and top of bank of an adjacent open space. This space should be revised to incorporate a 1.0m mow strip along the sidewalk and trail, and 4:1 slope into the pond for safety purposes.	Acknowledged. To be addressed during final design. We note that a small retaining wall (say 0.6m high) could be readily utilized to reduce the slope to 4:1.
40	Similar to the above, the ~30-36.1% slopes between the private road and buffer are a concern. Please revise this to align with CELM guidelines of 4:1 maximum slopes.	Acknowledged. To be addressed during final design. We note that a small retaining wall (say 0.6m high) could be readily utilized to reduce the slope to 4:1.
41	The Urban Design Guidelines note the proposed trail will include lighting. This is not a City standard or requirements and is not recommended within the natural feature buffer. Please see further comments from the City's Environmental Planning team.	Acknowledged. The Urban Design Guidelines will be amended through the future site plan submission.
	5. Parks, Forestry and Cemetery Services	
42	The proposed publicly owned park location and size is acceptable to Parks, Forestry & Cemetery Services (PFCS), provided that the environmental lands are conveyed to the City for long-term protection through municipal ownership.	Acknowledged
43	If the environmental lands are not conveyed to the City, additional parkland dedication will be owed in accordance with the City's Parkland Dedication By-law and the Planning Act, to be satisfied in a manner acceptable to the City. To be clear, the City's preference is for land dedication, however we reserve the right to accept alternative forms of dedication at our discretion.	Acknowledged. Discussion to continue as part of the plan of condominium and site plan on the conveyance of lands.
44	We note that the proposed park block area is currently forested. PFCS would like to preserve a significant portion of the forest on site and develop the active park space in a way that fits in with the existing forest. For this purpose, a Tree Management Plan should be developed (at	Acknowledged

	the Site Plan stage) for the proposed park site that will guide the layout of the park, including the exact location of the proposed trail.	
45	In accordance with the parkland dedication bylaw, the proposed park block shall not be encumbered. The proposed infiltration swale encumbers the land and significantly restricts the area that can be used for park amenities/features, etc. The infiltration swale also does not fit in with PFCS aim to preserve the existing trees on site and therefore the infiltration swale should be removed. For reference, there should be no stormwater runoff directed on the park block from the remainder of the site at all.	Acknowledged – to be addressed in Final Design. Note we concur that given the relatively small area of the park and its pervious nature, that the swale could be eliminated and stormwater could instead be sheet drained northeasterly to naturally infiltrate.
46	Please clarify if the proposed trail is meant to be public or privately owned. Clarification is required as the proposed trail currently moves between proposed public and private spaces.	The intent is for a public trail. Details to be addressed through site plan.
	6. Building Standards	
47	Division B 7.1.2.4 Shared Services building code compliance required throughout development. Applicant response matrix within Engineering comments indicates that one phase of condominium is proposed.	Acknowledged
	7. Waterloo Fire Rescue- Fire Prevention Division	
48	Fire prevention staff have no comments or concerns on the proposed Official Plan Amendment and Zoning By-law Amendment but may have some comments related to the proposed structures from an operational perspective at the detailed design stage.	Acknowledged
49	Any future Site Plan application and Building Permit application should be forwarded to the Waterloo Fire Rescue – Fire Prevention Division for further comments.	Acknowledged
Grand River Conservation Area (GRCA)		
50	Our previous concerns have now been addressed. As a result, we are now in a position to recommend draft plan approval of the condominium with the following 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 storm water management report in accordance with the 2003 Ministry of the Environment Report entitled "Stormwater Management Planning and Design Manual". b) A detailed Environmental Impact Study; c) A detailed Lot Grading, Servicing and Storm Drainage Plan. d) An Erosion and Siltation Control Plan in accordance with the Grand River Conservation Authority's Guidelines; e) The submission and approval of a permit under the Prohibited Activities, Exemptions and Permits Regulation from the GRCA prior to the construction in a wetland and/or grading in a regulated area and/or construction of the Stormwater Management outlet in a regulated area.	Acknowledged

	We trust that the municipality will ensure an agreement between the owners and the municipality contain provisions for the completion and maintenance of the works in accordance with the approved plans and reports noted in Condition 1) above. Once the above has been met, we can issue GRCA's clearance of the condominium to the municipality.	
51	As part of the GRCA permit, GRCA requests that the following comments are addressed: A. Please confirm the vertical datum on all civil drawings with elevations. B. Please confirm that extended detention is provided for the 25 mm rainfall event with a minimum drawdown time of 24 to 48 hours. C. Please provide construction drawings and notes to ensure the proposed design and installation of the stormwater outlet pipe through the wetland prevents alteration of subsurface drainage patterns.	Acknowledged – to be addressed during Final Design.
Region of Waterloo		
	1. Water Services	
52	Staff has reviewed the Functional Servicing Report from JPE Engineering dated January 21, 2025, and concur with the findings. However, staff notes that any fire flow calculations submitted in subsequent Functional Servicing Reports will only be accepted if they adhere to the Fire Underwriters Survey (FUS) methodology and comply with its requirements, in addition to meeting Ontario Building Code standards. This can be addressed as part of site plan.	Acknowledged – to be addressed during Final Design.
	2. Hydrogeology & Water Programs (Source Water Protection)	
53	Hydrogeology and Water Programs staff have reviewed the Stormwater Management Report (Water's Edge, March 2025) for the above-noted applications and have no comments. A Final Stormwater Management Report is required as part of site plan, to the satisfaction of the Region of Waterloo.	Acknowledged – to be addressed during Final Design.
54	Please note, the owner/developer should be made aware that the Region does not support permanent active or passive dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. Below-grade infrastructure requiring dry conditions should be waterproofed.	Acknowledged.
55	A salt management plan will be required, prior to site plan approval, for each multiple residential block. The owner/developer will be required to enter into an agreement with the Region to secure implementation of this requirement as part of any future consent or plan of condominium application, to the satisfaction of the Region of Waterloo.	Acknowledged – to be addressed during Final Design.
56	As previously noted, the subject site is designated Wellhead Protection Sensitivity #8 in the Regional Official Plan (ROP). Policy 8.A.18 of the ROP permits geothermal energy systems subject to further study pursuant to Policy 8.A.4. Should the applicant wish to pursue geothermal energy systems in development of the site, a provision should be included in the	Acknowledged.

	ZBL amendment to require the additional studies. Otherwise, a provision should be included in the proposed ZBL amendment to prohibit such use.	
	3. Corridor Planning	
	3.1 Environmental Noise	
57	Staff have previously reviewed and provided comments on the Noise Study report entitled 720 Erbsville Road, Waterloo, ON Noise Report, prepared by IBI Group, dated October 2021. A Noise Study addendum, 720 Erbsville Road, Waterloo, ON Environmental Noise Study Revised Site Plan prepared by JPE Engineering, dated November 8, 2023 acknowledges that the analysis and findings of the October 2021 Noise Report remain valid for the revised Site Plan, and thus the report's recommendations remain unchanged for the revised Site Plan. The Study recommendations are set out in detail in the Region's comments of March 13, 2023.	Acknowledged.
	3.2 Access Permit/TIS/Access Regulation	
58	An addendum to the 2022 Transportation Impact Study (TIS) will be required to reflect current information and conditions relevant to the site. This can be secured by way of a holding provision to the proposed zoning by-law amendment, with addendum to be completed to the Region's satisfaction prior to lifting of the holding provision.	Acknowledged, please refer to the revised Planning Justification Report Addendum.
59	The applicant's transportation consultant would be required to attend a TIS preconsultation meeting with Regional staff prior to commencing the addendum study.	Acknowledged
60	Any recommended and approved off site works would require an approved functional design and approved cost estimate to the satisfaction of the Region.	Acknowledged
61	Please note that there is a $500.00 fee for the review of transportation impact study by Region staff. This fee will be required prior to Regional approval of the study.	Acknowledged
62	A Regional Access Permit will be required for the proposed accesses to Erbsville Road. The proposed accesses must comply with the Regional Access Policy. The applicant will be responsible for all costs associated with the proposed access. The fee for the issuance of the permit is $230 each.	Acknowledged
	3.3 Regional Road Dedication	
63	At this location, Regional Road #70 (Erbsville Road) has a designated width in the Regional Official Plan (ROP) of 30.48 metres from Keats Way to Schnarr Street and 20.117 meters from Schnarr Street to Conservation Drive. As the existing property line varies along the frontage of this property, an approximate 3m road widening would be required along the frontage of Erbsville Road between Keats Way to Schnarr Street, and an approximate 4.5m from Schnarr Street to Conservation Drive. An Ontario Land Surveyor (OLS) would have to determine the exact road widening.	Please refer to the updated concept plan.
64	It is recommended that the OLS contact Region staff to discuss the road widening prior to preparing the Reference Plan. The land must be dedicated to the Region of Waterloo for road	Acknowledged

	allowance purposes and must be dedicated without cost and free of encumbrance. All land dedications should be identified on the Site Plan.	
65	The Owner/Applicant must engage an OLS to prepare a draft reference plan which illustrates the required road allowance widening. Prior to registering the reference plan, the OLS should submit a draft copy of the plan to the Transportation Planner for review. An electronic copy of the registered plan is to be emailed to the Transportation Planner. Further instructions will come from the Region's Legal Assistant with regard to document preparation and registration.	Acknowledged
	3.4 Transit Planning	
66	Grand River Transit requires funds in lieu of the provision of one concrete pad and one 5'x12' shelter (approx. $16,000 total, 2025 pricing subject to change based on concrete pad size) for future services on Erbsville Road opposite Regal Place. Detailed specifications of concrete pad and costs can be provided at future site plan stage.	Acknowledged
	3.5 Stormwater Management & Site Grading	
67	Regional staff has received the report titled Functional Servicing Report, 720 Erbsville Road, Waterloo Ontario, that includes the updated Functional Grading Plan (Drawing FE-1) and Functional Servicing Plan (Drawing FE-2) prepared by JPE Engineering dated January 21, 2025. Staff have also received the updated Stormwater Management Report titled Sunvest Development Corporation, 720 Erbsville Road, Waterloo, ON, dated March 14, 2025, prepared by Water's Edge Environmental Solutions Team. Comments will be provided separately.	Acknowledged
68	The site must be graded in accordance with the approved plan and the Regional Road allowance must be restored to the satisfaction of the Regional Municipality of Waterloo.	Acknowledged
69	Please be advised that the any new servicing connections or update to the existing servicing would require Regional approval through a separate process of Municipal Consent.	Acknowledged
	3.6 Sidewalks	
70	Sidewalks are sometimes requested by Transit staff to ensure safe and proper connections to bus stops, but in this case, no such request was indicated. The Region's Transportation Capital Program indicates the Erbsville Road reconstruction to include sidewalks where none exist.	Acknowledged
	3.7 Other	
71	The Region's 2025 Transportation Capital Program identifies this section of Erbsville Road (Regional Road #70) for reconstruction and major rehabilitation in 2030/2031 with works from Columbia Street West to Waterloo/ Woolwich boundary.	Acknowledged
72	A Site Plan pre-consultation fee of $300 and a Site Plan review fee of $805 will be required for the review and approval of a future Site Plan application.	Acknowledged
	3.8 Condition of Approval for Future Site Plan Application	
73	Approval of the road widening, Access Permit, and Lot Grading and Stormwater Management and Transit facility would be required prior to final approval of the future Site Plan application.	Acknowledged

74	Approval of the road widening, Access Permit, and Lot Grading and Stormwater Management would be required prior to final approval of the future Site Plan Application.	Acknowledged
	4. Housing	
75	Staff has no further comments on this file as the developer has indicated in the response matrix that affordable housing will not be included in this development.	Acknowledged
	5. Proposed Official Plan and Zoning By-law Amendments	
76	As noted in above comments, should the applicant wish to pursue geothermal energy systems in development of the site, a provision should be included in the ZBL amendment to require the additional studies. Otherwise, a provision should be included in the proposed ZBL amendment to prohibit such use. As well, a holding provision to secure completion of an addendum to the 2022 Transportation Impact Study (TIS) will be required, to reflect current information and conditions relevant to the site. With the addendum to be completed to the Region's satisfaction prior to lifting of the holding provision.	Please refer to the updated Planning Justification Report Addendum.