720 Erbsville Road Post Circulation Comments January 24, 2024		
	Comments	**Responses**
City of Waterloo		
	1. Official Plan	
	1.1 Low Density Residential Designation	
1.	The subject lands are designated "Low Density Residential" on Schedule 'A' of the Official Plan. The Low Density Residential designation allows for consideration of a range of low-rise buildings as well as community uses. The maximum density of any one site shall not exceed 150 bedrooms per hectare, and the maximum height of buildings shall not exceed 10 metres.	Acknowledged.
2.	The Official Plan contemplates developments such as terraced dwellings in Low Density Designated areas through policy 10.1.3 (7). For clarity, "Terraced Dwellings" (term used in Official Plan) and "Stacked Townhouses" (term used in Zoning By-law) are equivalent built forms. Policies 10.1.3 (8) – (9) outlines the criteria that must be met to contemplate terraced dwellings in Low Density residential designated areas. In general, terraced dwellings/stacked townhouses can be contemplated for the subject site, though more specific considerations for the development of terraced dwellings are outlined in SPA 3, Erbsville South Block Plan.	Acknowledged.
3.	Policy 10.1.3 (8) (h) address the requirement for development to be built in a context sensitive manner that is consistent to the neighbourhood character. Policy 10.1.3 (8) (f) states that "The development capacity of the site is not exceeded, and the proposal does not require significant relief from standard regulations". Further, policy 10.1.3 (8) (g) notes "The Development maintains the land use intensity of the surrounding low density neighbourhood."	Acknowledged.
4.	While the stacked townhouse use is contemplated in the low density residential designation and further permitted thought SPA 3, the scale of the proposed use greatly exceeds the intent of policy 10.1.3 (8) and SPA 3 (see additional Block Plan comments below). Staff note that a significant increase is being requested to the size of the stacked townhouse blocks. A total of 8 units are contemplated within a stacked townhouse block, whereas 24 units are being requested. In addition, to facilitate the development, as proposed, significant reductions are being requested to the parking requirement and the minimum rear yard setbacks.	The concept plan has been revised to reduce the size of each stacked townhouse block to 16 units per block (4 units wide and 4 units vertical). The proposed Official Plan Amendment has been revised to request a maximum stacked townhouse block size of 16 units. The reductions to parking has been removed from the revised Zoning By-law Amendment and the concept plan has been updated to provide parking in excess of the zoning by-law requirements at a rate of 1.49 spaces per stacked townhouse unit and 1.33 spaces per Townhouse unit. The

	Lastly, at the proposed built form of 24 units within a block, the proposed stacked townhouses are not consistent with policy 10.1.3. (9), which speaks to locational criteria applicable to stacked townhouses. The intent of policy 10.1.3 (9) is to direct stacked townhouse blocks that are larger in scale with greater residential density adjacent to designated Nodes or Corridors to form as a buffer between Low Density Residential properties and properties within the designated Node/Corridor.	requested amendment to the required rear yard setback has been reduced to 5.0 where 2.8 metres was previously proposed. Site specific provisions are proposed to ensure that decks can be accommodated in the reduced rear yard area. Please refer to the Planning Justification Addendum Letter for further analysis of the requested Official Plan and Zoning By-law Amendments.
	1.2 Erbsville South Block Plan (SPA 3)	
5.	The subject lands are within the boundary of the Council-adopted Erbsville South Block Plan Area. The policies of the Block Plan form Special Provision Area (SPA) 3 of the Official Plan. The Block Plan was developed through a public planning process, which refined the land use direction outlined within the Official Plan. The Erbsville South area is identified on Schedule 'A6' of the Official Plan. The subject lands are designated as 'Low Density Residential', on Schedule 'A6b' of the Official Plan which is referenced within the Erbsville South Block Plan. The intent of the Block Plan is to provide detailed guidance regarding the expected development pattern and land uses in the Erbsville South Block Plan Area (policy 11.1.3 (1) of the Block Plan).	Acknowledged.
6.	*Coordinated Development* The Erbsville Block Plan includes two development parcels on the east side of Erbsville Road. The subject development includes 720 Erbsville Road, which is the larger of the potential development blocks. Adjacent to the site is a smaller development parcel located at 672 Erbsville Road. As per the Block Plan, development of 720 Erbsville and 672 Erbsville should be coordinated the greatest extent possible as per policy (14) of the Block Plan which states: It is unclear if attempts have been made to coordinate development with the adjacent lands. Coordination of development is important to ensure that the transportation/active transportation, servicing and parkland planning for the site are appropriate and completed in an efficient manner	The concept plan has been designed to facilitate a coordinated development with the adjacent lands at 672 Erbsville Road. A future road connection has been provided to the adjacent lands and the proposed stormwater pond and amenity area on the south edge of the subject lands have been located to allow for the adjacent lands to connect to and expand on these facilities once development of the 672 Erbsville Road lands is proposed. The owner of the subject lands has been in contact with the adjacent owner of the 672 Erbsville Road, and the updated concept plan provides a more coordinated approach while maintaining the two properties in separate ownership. A letter outlining the concerns of Trillium Estates Limited was received and we have included responses to their comments and concerns later in this matrix.
7.	*Built Form*	

	The intent of the Erbsville South Block Plan is to provide for development that will maintain and enhance the character of the former Erbsville settlement as a low-rise residential area. The Block Plan policies note that a range of residential unit types are contemplated in the Block Plan area. Policy 21 (policy 11.1.3 (21)) of the Block Plan states:	Acknowledged.
	Policy 31 of the Block Plan (policy 11.1.3(31)) further outlines requirements for the development of stacked townhouses noting: Where the Block Plan limits stacked townhouse blocks to 4-units wide by 2-units vertical (total of 8-units per block), the proposed development includes blocks of up to 6-units wide by 4-units vertical (total of 24-units per block).	Acknowledged. The proposed Official Plan Amendment seeks to amend this policy by requesting a total of 4 units wide, and 4 units vertical, for a total of 16 units per block. Please refer to the Planning Justification Addendum Letter and revised Official Plan Amendment for further detail.
	The intent of the Block Plan is to provide for diversity in unit types and density while recognizing the unique character of the Erbsville area and the constraints (limited development blocks surrounded by sensitive environmental areas). These constraints, and the area's location in northwest Waterloo, result in limited public amenities with lower densities being contemplated. While Erbsville Road is a Regional road, it maintains a rural cross-section. The high concentration of sensitive environmental lands result in this area of the City maintaining a less-urban character compared to other parts of the City. Therefore, the density of development area was limited based on the need to maintain the greenfield density of 55 persons and jobs per hectare, while recognizing the constraints of the area. The Block Plan identified this lower density character through the guiding principles. For example a guiding principle under the built form section states in 11.1.3 (3) (b) i) "Where feasible, shorter block lengths are preferred". Also, the context of the plan area is intend to be low rise residential. Policy 11.1.3 (3) (d) states:	Acknowledged.
	As such, any proposed stacked townhouse blocks are limited in the Erbsville South Block Plan to a total of 8-units. The proposal of 24-units is a 200% increase over what was originally envisioned for the area. The 24 unit townhouse blocks, as proposed, are more suited to a minor node area, or a more urbanized cross section. Planning staff are not supportive of the proposal to increase the stacked townhouse blocks to 24-units. The scale of the 24-unit stacked townhouse blocks are not consistent with the Council-adopted Erbsville Block Plan. A more modest increase of four unit vertical and four units wide could perhaps be considered, if it is demonstrated that the proposed development appropriately addressed all applicable Official Plan policies.	Acknowledged. The revised Official Plan Amendment and Concept Plan contemplate a maximum block size of 4 units wide, by 4 units vertical. Justification for the proposed Official Plan Amendment to include block size is provided in the Planning Justification Addendum Letter.

	In addition, to the increase in block size and number of units within each stacked townhouse block, additional height is being requested (12 m whereas 10 m is permitted). Planning staff are of the opinion that a 12 metre height could only be considered if the width of the stacked townhouse blocks remains narrow.	Acknowledged. The requested zoning by-law amendment continues to propose and increased building height of 12m, but the block lengths have been reduced to reduce the overall mass of the stacked townhouse blocks. Please refer to the Planning Justification Addendum Letter for further detail.
8.	*Open Space and Parks* The Erbsville South Block Plan identifies the conceptual location for Open Space areas on Schedule 'A6b' and Schedule 'A6d' of the Official Plan. These conceptual locations are not intended to indicate exact locations for parks and open space, but are intended to highlight that some park space should be included in each development area within the Block Plan area. Policy 11.1.3 (48) of the Block Plan states: *(48) Schedule 'A6b' identifies conceptual Open Space locations, which could consist of small parks, trail connections, community gardens and similar features that provide recreational opportunities for the future residents. Open Space areas will provide opportunities for each individual development enclave and the broader neighbourhood to interact and gather locally, and thus designed and located as focal points within each enclave.* There does not appear to have been any provisions of parks and open spaces in the proposed development. Further, policy 11.1.3 (9) encourages open spaces to locate adjacent to Wideman Creek to support linkages. As an alternative for providing public open space, the Block Plan contemplates meeting park space needs through privately owned public spaces (POPS) as detailed in policy 11.1.3 (51), which states: *(51) To achieve adequate provision of park spaces and trials, the City may consider Privately Owned Public Spaces (POPS) within the Erbsville South Block Plan Area as a condition of development. Under all circumstances, such spaces shall be welcoming to the general public, and not viewed as "private".*	Acknowledged. Open space is proposed on the subject lands. Acknowledged. In accordance with Schedule 'A6b' of the Official Plan, two open spaces have been identified on the updated concept plan. An amenity area has been added to the north end of the plan, adjacent to the proposed stormwater pond. A second amenity area has been added to the south end of the plan, with the potential to be expanded onto the adjacent 672 Erbsville Road lands once developed. A conceptual trail network has also been proposed to create connections between the development area and buffer area.
9.	*Mobility Principles and Trail Connections*	

	In regards to mobility, the Erbsville South Block Plan places a high degree of importance on creating a walkable and accessible community. Several guiding principles outline the importance of mobility as outlined in policies 11.1.3 (3) (c) (i)-(vi). Further, Schedule 'A6d' of the Official Plan outline a conceptual trail location along the buffer area of the subject lands. The proposed development should incorporate an active transportation connection through the subject lands in accordance with the Block Plan. As currently proposed, there is a large parking area in the middle of the developable area, which is not conducive to safe and accessible active transportation. Policy 11.1.3 (65) outlines the need for a complete streets approach within the Block Plan area. Therefore, mitigations measures outlined in the policies including sidewalks, traffic calming and pedestrian crossings for the internal areas of the site should be considered to mitigate impacts of vehicular traffic. Policies 11.1.4(66)-(72) outline additional provisions for active transportation	Acknowledged. In accordance with Schedule 'A6d' of the Official Plan a conceptual trail network has also been added to the master plan to create connections between the development area and buffer area. Acknowledged. Sidewalks are provided throughout the site on all internal roads and pedestrian crossings are proposed to ensure safe pedestrian site circulation. Further detail related to signage and traffic calming will be provided during the detailed design and site plan stage.
	2. Urban Design	
10.	**2.1 Built Form**	
11.	The site has been designed with 2, 3 and 4-storey townhouse and stacked townhouse units which have been oriented towards the interior of the site.	Acknowledged.
12.	The proposed buildings are oriented away from the street with no entrances facing Erbsville, and instead face the parking lots located in the interior of the site. To complement the street facing character of the local village as well as create an active, pedestrian-oriented streetscape, the development should be revised to align with principles of good urban and community design, as well as the policies in the SPA that discourage backlotting (e.g. 11.1.3.(24), 11.1.3(25)(2), and 11.1.3(25(5)).	Acknowledged. As a Regional Arterial road with controlled access, vehicle access to Erbsville road is limited. Vehicle access to each unit adjacent to Erbbsville Road is provided from the internal road network to limit the required number of vehicle accesses to Erbsville Road. In order to create an active, pedestrian oriented streetscape along Erbsville Road, the proposed stacked townhouse units along the west property line will be designed as dual frontage buildings to address both the internal street network and the Erbsville Road frontage. Dual frontage units will utilize high quality materials, enhanced building design and extensive landscaping along Erbsville Road to enhance the public realm. The elevations provided in the Urban Design Guidelines are conceptual and further details related to the design of the proposed dual frontage buildings will be provided during the site plan stage of development.

13.	The UDG states that the Stacked townhouse units will be designed with prominent porches to provide clear entrances to each unit. Vertical articulation through the use of prominent front porches and building entrances will also be used to ensure that facades read as individual units, rather than a single mass. This is true, however only for the portion of the buildings that are internal facing. The intent is for units to read as individual units facing the public right-of-way. A more balanced approach to how the street facing units are designed is required.	The building renderings included in the Urban Design Guidelines are conceptual at this stage. Building elevations will be finalized during the site plan application stage. In accordance with the submitted Urban Design Guidelines, the dual frontage units facing Erbsville Road will be designed with high quality materials, enhanced building design and extensive landscaping.
14.	Consider architectural variation between the neighbouring townhouse blocks.	The building renderings included in the Urban Design Guidelines are conceptual at this stage. The design of townhouse and stacked townhouse blocks will be finalized at the site plan stage.
15.	Precedent townhouse imagery was shown in the Urban Design Guidelines that claimed to have "prominent building entrances", and "prominent front porches" when in fact the examples are more than 50% garage doors at grade. In order to establish an improved pedestrian experience, consider recessed garages and larger more prominent porches/entrances as well as windows at grade.	Acknowledged. The concept plan identifies townhouse units which do not include projecting garages. Details relating to the design of the facades of townhouse units will be provided during the site plan stage.
	2.2 Site Plan and Organization	
16.	Consider breaking up the parking into even smaller parking courts as opposed to the very lengthy parking "road" bisecting the center of the development. More localized courts directly affiliated with an adjacent townhouse block would be more balanced and attractive.	The concept plan has been revised and the majority of parking remains central to the site to provide convenient parking access to the stacked townhouse units. Smaller parking areas are also located near the townhouse units to provide convenient visitor parking access. Some small parking courts are proposed, but these have been reduced along Erbsville road to orient parking away from the public road frontage as much as possible.
17.	Staff would like to see sidewalks on both sides of the proposed condominium roads for a complete and safe circulation network for **all** users.	Sidewalks are provided on both sides of the proposed internal street network, with the exception of the easterly road which only includes one sidewalk. A sidewalk on both sides of this street is not possible when balancing buffers to natural heritage features and providing sufficient rear yard setbacks. The sidewalk on the west side of the easterly road will provide sufficient access for all users accessing the townhouse units on the east end of the development area.
18.	Internal "streets" should provide adequate space for large canopy tree plantings for pedestrian comfort and climate control	The proposed internal roads provide sufficient space for large canopy tree plantings as identified on the updated concept plan.

		Specific locations for tree plantings will be identified on Landscape plans during the detailed design and site plan stages.
	3. Zoning	
19.	**3.1 Conservation (OS3) Zoned Lands**	
20.	It is the City's long standing practice to secure environmental lands and associated buffers in public ownership. Therefore, OS3 zoned lands should be conveyed to the City prior to Site Plan approval.	The applicant plans to maintain ownership of the environmental lands and associated buffers.
21.	**3.2 Residential Eight (R8) Zoned Lands**	
22.	3.2.1 Visitor Parking The applicant should reconsider the request to reduce the required visitor parking spaces associated with the 59 townhouse units from 0.33 spaces per townhouse unit (20 parking spaces) to 0.05 spaces per townhouse unit (3 parking spaces). This is a significant reduction, especially when taking into consideration how isolated the subject site is. The site is surrounded either by environmental lands or farmland on three sides with no opportunity for parking overflow. To the west is Erbsville Road and Regal Place subdivision, neither are appropriate for parking overflow. Parking is not permitted on Erbsville Road and parking on Regal Place would be unsafe for visitor as they would have to cross a busy Regional road without a safe pedestrian crosswalk in place. In addition, there is no bus service in front of the subject site. The nearest bus stop is approximately a kilometer away at the intersection of Laurelwood Drive and Erbsville Road. Similarly, the nearest Commercial Plaza, Laurelwood Commons, is also located approximately a kilometer away.	Acknowledged. The request to amend the required visitor parking rate for townhouse units has been removed. The concept plan provides for 1.33 spaces per townhouse unit and 1.49 spaces per stacked townhouse unit.
23.	The Planning Justification Report (PJR) states that the reduction in visitor parking would be offset by the additional tandem parking spaces in each of the driveways. It notes that each of the townhouse units will have a required parking space in the garage and an additional parking space in front of the garage in the driveway. According to the PJR the visitor parking reduction is appropriate because any visitor parking space requirements can be satisfied by the one additional parking space in the driveway of each of the townhouse units. Planning staff disagree with the above rationale that the visitor parking needs of the townhouse units can be offset by the additional tandem parking space in the single car driveways for the following reasons:	Acknowledged. The request to amend the required visitor parking rate for townhouse units has been removed. The concept plan provides for 1.33 parking spaces per townhouse unit and 1.49 parking spaces per stacked townhouse unit. The proposed parking rates will provide for a visitor parking rate of 0.33 parking spaces per townhouse unit and 0.49 parking spaces per stacked townhouse unit, to be provided by way of visitor parking spaces independent of townhouse driveways.

	• It is very likely that the driveway of the townhouse units will already be occupied by a second car. For example, there may be a second member of the household that requires a car for their day-to-day commute. • It is highly unlikely that only one additional parking space will be able to accommodate all required visitor parking needs when a unit owner has a gathering. Generally, multiple people and families are invited to a gathering, requiring multiple parking spaces at a time. One additional parking space in the driveway would not be able to accommodate the visitor parking demand of the unit. Also, it is not likely that unit owners would make their driveways available to their neighbours to accommodate guest parking. Therefore, planning staff are of the opinion that the required visitor parking should be accommodated independent of the space available in the single driveway of the townhouse units. Please redesign the proposed development to meet the parking requirements of the R8 zone. If some reduction in the visitor parking is still required then a Parking Study with appropriate rationale will have to be submitted as part of the resubmission package. Staff recognize that the applicant is currently working on redesigning the proposed development and may have made appropriate changes to address the above raised concerns in a proposed redesigned Concept Plan, dated February 1, 2023	
	3.3 Interior Lot Line Setback	
24.	The Residential Eight (R8) zone requires an interior lot line setback of 7.5 metres. The purpose of the 7.5 metre setback requirement is: • To ensure that there is sufficient space in the rear yard of the townhouse units for a private amenity area and to ensure that there is sufficient space in the rear yard of the stacked townhouse units for a shared common amenity area. • To ensure that there is sufficient space in the side yard of townhouse buildings and stacked townhouse buildings for access, maintenance and drainage.	Acknowledged.

25.	Staff are concerned that the rear yards of some of the townhouse and stacked townhouse blocks have been significantly reduced. See below image for reference, townhouse blocks in questions are highlighted in yellow. The rear yard setback of the eastern townhouse block ranges between 3.0 metres and 4.2 metres. At 3.0 metres and 4.2 metres these rear yards could not accommodate a raised deck, which would have to meet a minimum rear yard setback of 4.0 metres. In addition, the usable rear yard of the external units would be further reduced as an access easement would be required to provide access to the internal units. The proponent should revise proposed conceptual site plan to ensure that the internal lot line setbacks for these rear yards meet the 7.5 metre requirement to the extent possible. Similarly, the rear yards of the northernmost and southernmost stacked townhouses have also been reduced significantly, ranging between 4.5 metres and 4.6 metres. The proposed rear yard setback seems significant especially for the northernmost stacked townhouse block. The proponent should revise the proposed conceptual site plan to ensure that the internal lot line setbacks for these rear yards meet the 7.5 metre requirement to the extent possible. If a deviation is required at certain pinch points an appropriate planning rationale should be submitted to justify the reduction. Staff recognize that the applicant has made appropriate changes to address the above raised concerns in the proposed redesigned Concept Plan, dated February 1, 2023.	Acknowledged. The concept plan has been revised to provide a minimum 5.0 metre rear yard setback. A site specific provision is also proposed as part of the zoning by-law amendment to permit a raised deck with a minimum rear yard setback of 2.0 metres. Please refer to the Planning Justification Addendum Letter for further detail. The concept plan has been revised to remove the southernmost stacked townhouse units and to provide a 7.5 metre rear yard for the northernmost stacked townhouse units. Acknowledged. A revised concept plan has been submitted as part of the second submission.
	3.2.3 Rear Yard Setback (interior to the site)	
26.	The rear yard setback and interior lot line setback overlap in some instances and have already been discussed in previous comments. In the case of two of the townhouse blocks in the interior of the proposed development, see below blocks highlighted in yellow, the proposed Master Plan identifies a rear yard setback of 4.9 metres	Acknowledged. Please refer to the revised concept plan. The rear yard setback for the noted townhouse units has been increased to 7.5 metres.
27.	Although internal to the site, the intent is that the rear yards of these internal townhouse blocks function the same way as the townhouse blocks along the exterior of the site and that they maintain a 7.5 metre rear yard setback to the degree possible to allow for a sufficient private amenity area. Staff are not supportive of the 4.9 metre rear yard setback. The proposed 4.9 metre rear yard	Acknowledged. Please refer to the revised concept plan. The rear yard setback for the noted townhouse units has been increased to 7.5 metres.

	setback does not provide sufficient space to accommodate a raised deck in these rear yards and would not provide sufficient space for a private amenity area.	
28.	In the resubmission consideration should be given to redesigning this area of the site to increase the rear yard setback for these blocks. For your consideration, staff suggest the following two redesign options be explored. Option 1 In reviewing the revised concept plan, dated February 1, 2023, consider removing the two townhouse blocks completely and locating the park space here. Locating the park space here would allow for convenient connectivity to the proposed trail and a visual connection to the stormwater management pond and the environmental lands beyond. Then consider relocating the 8 units lost in a stacked townhouse form along Erbsville Road. This could be achieved by breaking up the existing 24 unit block into two 16 unit, 3 storey blocks. See below redlined image of Option 1 for illustration purposes. Option 2 Rotate existing townhouse blocks 90 degrees and reduce the size of one block to 3 units. This configuration could potentially achieve a 9 metre rear yard setback. See following image for your consideration.	Acknowledged. Please refer to the revised concept plan. The rear yard setback for the notes townhouse units has been increased to 7.5 metres.
29.	Please note that if a 7.5 metre rear yard setback cannot be accommodated, then planning rationale should be submitted as part of the resubmission to justify the appropriateness of a rear yard that is less than 7.5 metres in depth.	Acknowledged. All requested amendments to the zoning by-law are justified in the Planning Justification Report Addendum Letter.
	3.2.4 Internal Road Width	
30.	In your resubmission please explain the need for a 9.0 metre wide internal road width. Is the intent to accommodate parallel parking on one side of the internal road? The maximum width of the internal road (driveway) is 7.6 metres as per Table 6H of the Zoning By-law. If the 9.0 metre width is to be maintained an additional zoning by-law amendment will be require as well as associated planning rationale	Acknowledged. Please refer to the revised concept plan. The internal road width has been reduced to 6.1 metres.
	3.2.5. Loading Space	
31.	One Type A Loading space (3 m by 7 m) will be required on the subject site, as per section 6.9.4.4 of the Zoning By-law. As part of the resubmission, please revise the conceptual plans to accommodate the required loading space.	The concept plan has been revised to provide parking in excess of the zoning by-law requirement. A loading space will be added to the plan at the site plan stage.
	3.2.6 Bicycle Parking	

32.	The stacked townhouse blocks require bicycle parking as per the section 6.6 of the Zoning By-law. As part of the resubmission, the conceptual plans should be revised to demonstrate that the required bicycle parking (0.3 Type A per dwelling unit and 0.3 Type B per dwelling unit) can be accommodated on the site	Bicycle parking will be added to the plan during the site plan application stage. The concept plan includes large open areas which are not required as amenity area where type A and B bicycle parking can easily be added.
	4. Site Design Considerations	
	4.1 Parkland	
33.	The proposed development should be redesigned to incorporate a park space that would meet the needs of the proposed development and the needs of existing developments in the surrounding area. The submitted conceptual Master Plan does not appear to incorporate any park space into the proposed development. Whereas, the Erbsville South Land Use Plan (Schedule 'A6b') identified two conceptual open space locations within the subject site.	Acknowledged. Two amenity areas have been added to the concept plan. These open spaces will be publically accessible from the internal sidewalk network which extends to Erbsville Road.
34.	The City's preference is that a park be conveyed to the City as per the City's Parkland dedication by-law, which stipulates that a 5% parkland conveyance is required for any residential development having a density of 100 units per hectare or less. As part of your resubmission, redesign the proposed development to incorporate a park space that is at least 5% of the net lot area. Based on a net lot area of 3.14 hectares, the park space should be at minimum 1,570 square metres in size. As stated earlier, the City's preference is that the park space be conveyed to the City, however as per the Block Plan the City will consider privately owned public spaces (POPS) to meet the park space needs of the development. Whether in public or private ownership the park space should be zoned Parks and Recreation (OS1) to ensure that its intended long term use is protected overtime	Two amenity areas have been added to the concept plan. The total shared amenity area is 1,572 square metres and 5% of the net lot area. The amenity areas are proposed to be rezoned as OS1 as per the updated zoning by-law amendment. The ownership of the proposed amenity areas will be private, but the lands will be publically accessible.
35.	In discussion with Park's staff the following locational criteria should be taken into consideration when locating the park space: a) One larger park space is preferred to two smaller park spaces. b) The park space should connect into the future trail connection that runs along the perimeter of the subject site. c) It is preferred that the park space is located adjacent to the storm water management pond. By locating the park adjacent to the stormwater management pond it will help to make the park space appear larger, especially if the park space is small (less than 0.5 ha in size). If possible, the park space should have frontage on a municipal road for easy access and visibility in case of an emergency	Acknowledged. In order to integrate the subject lands with the adjacent lands at 672 Erbsville Road, two amenity areas are proposed. The amenity area adjacent to 672 Erbsville Road could be expanded to create a larger central amenity area between the two developments. Both amenity areas are adjacent to the proposed stormwater management ponds and the north amenity area has public road frontage on Erbsville Road. Both amenity areas are accessible from the internal sidewalk network and the proposed conceptual trail.

	4.2 Trail Connection	
36.	The proposed development should be redesigned to incorporate a trail connection wrapping around the outside of proposed development as shown within Schedule 'A6d' (Erbsville South: Mobility Network) of the Official Plan. The proposed trail connection should connect into the internal sidewalk network and the proposed park space. The trail connections can be located within the natural feature buffer and should be conveyed to the City as part of the Conservation (OS3) zoned lands. Please note that the trail connection should run all the way down to Schnarr Street, as shown within Schedule 'A6d' (Erbsville South: Mobility Network).	Acknowledged. A conceptual trail has been added to the master plan, wrapping around the development within the natural feature buffer. The conceptual trail provides connections to the proposed amenity spaces on site, the adjacent lands at 672 Erbsville Road, and ends near Schnarr Street. Once Erbsville road is upgraded with sidewalks, it will be easy for trail users to connect to Schnarr Street with a crossing.
	4.3 Sidewalk along Erbsville Road	
37.	The Mobility Principles outlined in policies 11.1.3 (3) (c) (i)-(vi) of the Erbsville South Block Plan have not been appropriately addressed. In the revised development concept please incorporate a sidewalk along Erbsville Road and incorporate appropriate pedestrian connectivity to the proposed trail connection. Also, explore whether it is feasible to incorporate a sidewalk on both sides of the internal roadway to address the Mobility Principles outlined within the Erbsville South Block Plan.	Acknowledged. Please refer to the updated concept plan. Sidewalks are provided on both sides of most internal roads, and one side of the easterly road. Sidewalk connections are provided to Erbsville Road and the conceptual trail. A 2.1 metre road widening is being conveyed to the Region of Waterloo, and the road is scheduled to be resurfaced in 2026. Sufficient widening has been provided for the Region to add sidewalks along Erbsville Road in the future.
	4.4 Orientation of Stacked Townhouses along Erbsville Road	
38.	The front of the stacked townhouses should be oriented toward Erbsville Road in accordance with SPA 3 policy 11.1.3 (24), which state that "residential dwelling are encouraged to face or flank Erbsville Road, without direct vehicular entrance onto Erbsville Road." As part of the resubmission, please redesign the stacked townhouse blocks along Erbsville Road to ensure that the blocks either face or flank Erbsville Road. The stacked townhouse blocks should complement the street facing character of the historic Erbsville settlement and facilitate good urban design.	Acknowledged. Vehicle access to each unit adjacent to Erbbsville Road is provided from the internal road network to limit the required number of vehicle accesses to Erbsville Road. In order to create an active, pedestrian oriented streetscape along Erbsville Road, the proposed stacked townhouse units along the west property line will be designed as dual frontage buildings to address both the internal street network and the Erbsville Road frontage. Dual frontage units will utilize high quality materials, enhanced building design and extensive landscaping along Erbsville Road to enhance the public realm. Further details related to the design of the proposed dual frontage buildings will be provided during the site plan stage of development.
	4.4 Orientation of Stacked Townhouses along Erbsville Road	
39.	As per Condition # 32 of Subdivision 30T-90039, within OMB Decision No. S910005, 720 Erbsville Road and 672 Erbsville Road have to be developed in conjunction and will need to be developed in a consolidated manner when it	The updated concept plan has been designed to facilitate a coordinated development with the adjacent lands at 672 Erbsville Road. A future road connection has been provided to the adjacent lands and the proposed stormwater pond and amenity area on the

	comes to access and servicing. Further, as per Erbsville South Environmental Study both properties must share the same SWM facility and the same SWM strategy.	south edge of the subject lands have been located to allow for the adjacent lands to connect to and expand on these facilities once development of the 672 Erbsville Road lands is proposed. The owner of the subject lands has been in contact with the adjacent owner of the 672 Erbsville Road, but they have not been open to a coordinated approach or the sale of their lands. The two sites were both assessed through the Erbsville South Environmental Study, which included a functional stormwater management review.
40.	Trillium Estates, owner of 672 Erbsville Road, has submitted a letter, dated January 11, 2023, raising a number of concerns about the proposed development and how it will impact 672 Erbsville Road. In the resubmission, the applicant will have to address all of the concerns raised by Trillium Developments, in their January 11, 2023 comment letter. Also, describe how the orderly development with Trillium Lands (672 Erbsville Road) will occur.	Responses to the concerns raised by Trillium Estates are included at the end of this matrix.
	4.5 Coordination of Development	
41.	As per Condition # 32 of Subdivision 30T-90039, within OMB Decision No. S910005, 720 Erbsville Road and 672 Erbsville Road have to be developed in conjunction and will need to be developed in a consolidated manner when it comes to access and servicing. Further, as per Erbsville South Environmental Study both properties must share the same SWM facility and the same SWM strategy.	Given the existing topography, it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
42.	Trillium Estates, owner of 672 Erbsville Road, has submitted a letter, dated January 11, 2023, raising a number of concerns about the proposed development and how it will impact 672 Erbsville Road. In the resubmission, the applicant will have to address all of the concerns raised by Trillium Developments, in their January 11, 2023 comment letter. Also, describe how the orderly development with Trillium Lands (672 Erbsville Road) will occur.	Responses to the concerns raised by Trillium Estates are included at the end of this matrix.
	4.6 Stormwater Management Pond	
43.	The proposed location of the Stormwater Management (SWM) pond does not align with the SWM pond location recommended by the Erbsville South Environment Study, which recommended that that one SWM facility serve both 672 Erbsville Road and 720 Erbsville Road and that it be located in the southeast	Given the existing topography, it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match

	corner of 720 Erbsville Road. The SWM pond location should be redesigned to better align with the Erbsville South Environment Study recommendation. Similar to the park space the SWM pond should be zoned Parks and Recreation (OS1), whether in public or private ownership.	the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville. Please refer to the revised concept plan which identifies the new SWM pond locations. The zoning by-law amendment has been revised to rezone the SWM ponds as OS1.
	4.7 Water Distribution System and Multiple Condominiums	
44.	In reviewing the submitted servicing plans it appears that the water main on 720 Erbsville Road crosses over to 672 Erbsville Road. Please note that the City does not support multiple condominiums sharing a single connection to the water distribution system. The applicant should ensure 720 Erbsville Road and 672 Erbsville Road have separate water connections from the Regional right-of-way if these properties will be under separate condominium ownership. In your resubmission please provide clarity on the future ownership of 720 Erbsville Road and 672 Erbsville Road. Are these properties intended to be owned by the same condominium or separate condominiums?	The functional servicing design for 720 Erbsville shows water servicing directly from the Erbsville Road watermain with no connection to 672 Erbsville. 720 Erbsville Road and 672 Erbsville Road are planned to be owned by separate condominiums with separate water connections to the existing 300mm diameter City watermain on Erbsville Road.
	4.8 Road Widening	
45.	The Region of Waterloo identified that this section Erbsville Road has a designated road width of 30.48 metres, therefore an approximate road widening of 2.1 metres is required along the frontage of the subject site (up to Schnarr Street). Submit a draft reference plan, prepared by an Ontario Land surveyor illustrating the correct road widening along Erbsville Road. Please updated all plans to reflect the correct road widening. Net lot area, density, landscape open space and setbacks should be updated accordingly.	Please refer to the updated concept plan which identifies a 2.1 metre road widening.
	4.9 Other Site Design Considerations/Master Plan Comments	

46.	• Include phasing of development (if the intention is to develop the subject site in phases) • All retaining wall should be clearly identified on the Site Plan and Grading Plan. If retaining walls are proposed they should not impact the 30 metre wetland buffer. • Townhouse blocks should be labelled in resubmission, allowing staff to easily refer to them and differentiate between them when providing comments. • Proponent should consult with Enova Power early on in the process to ensure that the number of Transformers required to service this site can be accommodated. • Transformers should not be located in the front yard. In resubmission please relocate transformer(s) so that they are not visible from Erbsville Road. • Snow storage location should be located as far as possible from the wetland and storm water drainage intake. • Site Statistics chart should be updated to correctly reflect amendment required from Zoning By-law	The 720 Erbsville Road site is planned to be developed in one phase. The functional grading does not identify a need for retaining walls. Please refer to the updated concept plan which identifies block names. Acknowledged. The transformer locations will be confirmed through the site plan process. Acknowledged. The conceptual transformer location has been relocated internal to the site. The transformer locations will be confirmed through the site plan process. Acknowledged. Snow storage locations will be identified during the site plan process. Please refer to the revised Master Plan for an updated Site Statistics Chart.
	5. Environmental Planning	
47.	1. Section 4.1.3 of the Planning Justification Report states that "…the pedestrian infrastructure allows for the establishment of connections to a possible future trail network through the open space system located immediately east of the proposed development". It is unclear whether this statement is referring to a trail within the natural feature buffers that would wrap around the proposed development and/or a trail through the natural features to connect to the property to the east. Trails and associated creek crossings are conceptually shown on Schedule 'A6d' of the Official Plan. Schedule 'A6d' shows a trail wrapping around the development but does not contemplate a trail connection through the natural features	Please refer to the master plan which identifies the conceptual trail network referenced in the PJR.
48.	The only trail connection contemplated through the natural features was at the south limit of the District on the Erbsville Kartway property. The EIS that was completed for the Erbsville Kartway property noted the following with respect to that potential trail connection: "It is recommended that this connection be removed as the natural area to be crossed is highly sensitive provincially	Proposed trail connections are limited to areas surrounding the development and within the natural feature buffers. No trail crossings of the natural features are proposed.

	significant wetland with deep organic soils and is significant wildlife habitat for turtle overwintering. A trail crossing here is inappropriate."	
49.	Based on the direction provided through the Official Plan and District Plan, as well as the findings of the Erbsville Kartway EIS, a trail connection through the natural features to the east should not be contemplated. However, should one be pursued, consistent with Official Plan policy 8.2.2(11), the City would need to undertake an EIS to evaluate a potential trail, as those lands are to be conveyed to the City through the Erbsville Kartway draft plan conditions. For any trails wrapping around the development, the Erbsville South Environmental Study (ESES) sets out that they may be permitted in the outer portions of buffers (i.e. the outer 5 metres) subject to consideration in an EIS so to ensure the trails do not reduce the integrity and functionality of the buffer. The EIS, as submitted, does not provide any specific analysis or recommendations related to trail layout or design. Should a trail wrapping around the development be pursued, the EIS will need to be updated.	A specific trail alignment has not been shown in the concept plan, however, recommendations for the trail, including alignment and low impact designs, have been included in the revised EIS. A more fulsome impact analysis will be provided through detailed design, once trail grading requirements and exact layout have been determined.
50.	The submitted plans and drawings show the dripline and the proposed 10 metre buffer from the dripline (labeled as the ESPA setback). Wetland limits and corresponding buffers also need to be shown, as does the buffer for Laurel Creek. Staff note that these limits and buffers are shown on Map 5 of the EIS but that map does not include the proposed development limit. Staff also note that the buffers on Map 5 are not fully representative of what is actually proposed.	Mapping in the EIS has been updated to ensure all feature limits and buffers are clearly shown, along with the proposed development limit. A grading limit has been identified which demonstrates the furthest development limit associated with any construction-related activities. A residential limit has been identified, which excludes buffer encroachments required for SWM infrastructure, and represents the limits of the residential lots.
51.	Based on the Draft Plan of Condominium, the lands containing the natural features and the buffer areas will be retained by the current owner. It is the City's preference and long standing practice to secure environmental lands in public ownership. This approach is supported by Official Plan policy 8.2.2(19), which identifies a number of options for securing lands in public ownership, and by the City's Environmental Lands Acquisition and Maintenance Policy (1999), which recognizes that environmental lands should be publically owned to the greatest extent possible. In addition to the natural features, and as set out by Official Plan policy 8.2.4(11), buffers required to ensure the protection of natural features are to generally be secured in public ownership.	The owner intends to maintain ownership of the natural heritage lands and their buffers.
52.	It is stated on page 8 of the EIS that Category 2 habitat for Blanding's Turtle does not overlap the development footprint. However, when Map 5 and 6 are compared, it appears the development footprint does encroach into the Category 2 habitat, as shown below through benchmarking measurements.	EIS maps have been updated to clearly show the buffer limits and development limit, and the impacts discussion in the EIS has been revised to more accurately describe encroachments with the current concept and preliminary grading plan.

53.	Section 2.3 of the EIS notes that "Stantec Inc. has undertaken monitoring of the property beginning in 2006 and continuing through to 2021, however, to-date reports have been prepared up to 2020." As set out in the Terms of Reference for the EIS, and as supported by City staff, an additional single year (2021) of pre-construction monitoring ahead of construction (i.e. site grading) will be undertaken. Please confirm if this work has been completed or whether the timing of this work has shifted based on when the development applications were submitted.	NRSI and Stantec Inc. have undertaken monitoring in 2023 to provide a minimum of one year of pre-construction monitoring immediately proceeding construction. Section 3.0 of the EIS provides a summary of pre-construction surveys completed to-date. The updated EIS also provides extensive updates to include the results of 2023 monitoring and the biological monitoring report is appended.
54.	Section 3.1.2 of the EIS notes that a tree inventory was completed for all trees along the perimeter of the proposed stormwater management pond location that have the potential to be impacted by the proposed development but that trees within the area of the proposed stormwater management pond and in the southeastern hedgerow were not individually inventoried since all trees will need to be removed in support of the proposed development, with a tally of these trees being completed to provide a general assessment of what is present so that any required compensation can be provided for these trees following their removal. Results of the tree inventory and tree tally are then presented in Section 4.2.3. Provided the other concerns raised are addressed, particularly Comments 3 and 9, and the owner of 672 Erbsville Road does not raise a concern about the removal of the southeastern hedgerow, staff can generally support the removal of the trees. A Tree Saving and Protection Plan that specifies measures for removal, retention and replacement using a 2:1 ratio will be required as part of detailed design.	The EIS has been updated to remove the discussion of the tree tally as the SWM blocks have been revised and no longer coincide with the areas surveyed in 2021. A Tree Saving and Protection Plan will be completed through detailed design to determine exact limits of tree removal required. The EIS recommends a 2:1 replacement for trees removed.
55.	Section 4.2.2.1 of the EIS discusses Black Ash, noting Black Ash was documented in the SWC4-2 community to the extreme southwest of the study area. Black Ash has also been confirmed east of the subject property through the North Waterloo Scoped Subwatershed Study and the EIS was completed (by NRSI) for Erbsville Kartway. The EIS for Erbsville Kartway mapped habitats containing Black Ash as Significant Wildlife Habitat under the Special Concern and Rare Wildlife Species category as follows:	Noted. The EIS has been updated to include this information. It is now discussed in Sections 4.2.2 and 5.6.3.
56.	Section 4.3.3.2 of the EIS discusses bats, noting that suitable maternity colony habitat for Species at Risk bats may be present in the house located to the immediate northwest of the proposed development footprint and that this building will be retained. Which house is being referred to? Is it the one circled in red below? Based on the Draft Plan of Condominium (dated December 17, 2021) and the Master Plan (dated October 19, 2022), it appears this house will be removed.	The house circled is the correct house being referred to, which is shown in Map 2 of the revised EIS. Bat habitat assessments and exit surveys were completed (see Section 3.1.5 for methods) and no bats were found to be utilizing the house or its addition (see 4.3.3 for results). It is anticipated that this house will be removed.
57.	Section 5.1.1 of the EIS states that a 30 metre buffer will extend from the wetland boundary. The 30 metre buffer is shown on Map 5, however, when compared and	The EIS maps and development concepts have been updated to show all buffers and the development limit. Buffer discussion is

	measured against the development footprint included on Map 6, the 30 metre buffer has not been consistently applied, as shown below. Minimal justification is provided for this under Section 5.3, where it is noted that the buffers have been smoothed to create a uniform edge as recommended in the ESES. This appears to be an unintended application of the ESES given that the buffer widths it recommends are minimum setbacks and the suggestion to smooth buffers to produce a uniform edge is made under the ecological enhancement section. Together, these two things suggest that smoothing of the buffers should have the effect of making the buffers wider on a variable basis, rather than narrower. Please provide a figure that shows areas of proposed buffer encroachment (i.e. areas where the buffer is less than 30 metres for the wetland and watercourse) and areas of buffer addition (i.e. areas where the buffer is greater than 30 metres for the wetland and watercourse).	now found in Section 6.2.1. Encroachments are outlined in Table 14 and shown on Map 7. Mitigation measures to ensure these encroachments do not negatively impact the features are included in Sections 6.3.1, 6.3.2, 6.3.3, and 6.3.4, related to direct impacts.
58.	The map included under Comment 7 should be used to complement/supplement the Significant Wildlife Habitat discussion provided under Section 5.1.	Noted. The EIS has been updated to incorporate this information.
59.	It is noted on page 65 of the EIS that the proposed development follows the land use structure of the Erbsville South Block Plan. At a minimum, this does not seem to be the case with the SWM facility. Section 7.6 of the ESES recommends that there be one SWM facility for 720 and 672 Erbsville Road. Staff defer to Planning Approvals and Engineering Services staff to determine whether the SWM facility as proposed would encumber the property at 672 Erbsville Road from managing its stormwater appropriately. Further, based on how the SWM facility is shown, it is unclear how it will be maintained. Typically, an access road, which also functions as a trail, is constructed around SWM ponds to facilitate access and maintenance.	The EIS has been updated to reflect the updated SWM report. Two SWM ponds have been provided on the property. Please refer to the SWM report and FSR for rationale.
60.	Section 6.3.4.2 of the EIS notes that in order to prevent migrating turtles from entering the developed areas, permanent wildlife fencing is recommended. A Blanding's Turtle Habitat Mitigation Plan for much of the lands within North Waterloo has been prepared (by NRSI) through work completed for the Erbsville Kartway and Northgate subdivisions. The Plan is attached for reference. Please confirm with MECP whether turtle barrier fencing will be required for this area as well	The EIS has been revised to provide additional recommendations for preventing impacts to Blanding's Turtle (see Section 6.3.3). An updated IGF will be provided to MECP once the designs have been confirmed. MECP no longer provides advice or recommendations unless an IGF has been submitted, so they can review the development and mitigations plans as a whole.
61.	Section 3.2 of the Functional Servicing and SWM Report states that in areas where 3:1 grading is not possible, retaining walls will be proposed to achieve the required slopes. Any retaining walls will need to be outside of the buffers and be able to be maintained without accessing the buffers.	Acknowledged. Note, the functional grading does not identify a current need for retaining walls.

62.	The infiltration swale shown on the Functional Grading Plan extends beyond the proposed Limit of Development that is shown. Further, any infiltration swale should be located outside of the buffer. As set out in Official Plan policy 8.2.4(9), buffers are to remain in or be restored to a primarily natural state and it is unclear whether the swale would need to be maintained/manicured.	To the greatest extent possible the infiltration swale has been kept outside the buffer. However, there were a couple of areas where this was not possible. The EIS has discussed this encroachment and found it acceptable.
63.	Consideration needs to be given to snow storage, as the piling or dumping of snow into buffers will need to be avoided.	Snow storage areas will be identified during the site plan application.
64.	Based on the review undertaken to date, it is anticipated the following will need to be included as conditions of approval, with the mechanism to be determined at a later time (e.g. development agreement and/or site plan agreement and/or condo declaration). For consistency, the wording that is ultimately used should be the same as or align with the wording that was used for the Erbsville Kartway and Northgate draft approval conditions. • Landscape Plan that includes buffer plantings, ecological enhancements and educational signage • Tree Saving and Protection Plan that specifies measures for removal, retention and replacement using a 2:1 ratio • Invasive Species Management Plan • Trail Network Plan • Comprehensive Fencing Plan • Turtle barrier fencing • Assessment of any trees to be removed for bird nests/potential bat roosting habitat in accordance with the Endangered Species Act and Migratory Birds Convention Act • Removal of refuse/garbage from the natural features and buffers • Operation Maintenance Plan for the SWM facility that specifies in-water maintenance work should not be undertaken between May 1 and August 31 to ensure no negative impact to Blanding's Turtle or where maintenance cannot be avoided, wildlife salvage will be implemented • Timing window for breeding bird season (April 1 to August 31) • Timing window for bats (April 1 to September 30) • Approval and implementation of a pre-, during- and post-construction monitoring program • Dedication of the environmental lands and their buffers to the City free of charge and without any encumbrances	Acknowledged. As noted above, the owner does not plan to dedicate the environmental lands and their buffers to the City.

	6. Development Engineering	
65.	Proposed servicing conflicts with Ontario Building Code. a. 672 Erbsville Road will require its own water and sanitary servicing connection to Erbsville Road. b. Shared stormwater management will require a shared servicing agreement between 720 Erbsville Road and the 672 Erbsville Road. City of Waterloo should also be included in the agreement. i. Proposed stormwater management pond could be privately owned.	Acknowledged. This is proposed. Acknowledged. To be prepared at Site Plan stage. It is proposed that both SWM ponds will be privately owned.
66.	Confirm how the regulatory floodline was determined with topographical survey.	GRCA has provided floodplain cross sections and these were plotted onto the topographical survey to locate the limit of the floodplain. Refer to the Functional Grading Plan.
67.	Provide detail of infiltration swale, including sizing calculations and demonstrate how infiltration targets will be met	Functional details shown. Final design will provide additional detail.
68.	Grading and Drainage from the site is to be designed such that overland flows do not negatively impact adjacent properties. The major overland flow routes from this property should be directed to the right of way and not to the adjacent property.	It is not feasible to outlet to Erbsville Road given the existing topography (the site falls over 5.7m from Erbsville Road to its eastern limits). The minor and major storms will be directed to the SWM ponds and these outlet via spreader swales to the eastern wetland and water course.
69.	An updated detailed water distribution analysis will be required at the detailed design stage. a. Discrepancies are noted with units used to calculate fire flow and the proposed development plans. b. Available flow from existing hydrant test were shown at 50 psi, where the required available flow should be demonstrated at 20 psi.	An updated water distribution analysis has been prepared and included in the revised FSR.

70.	The proposed stormwater management facility is not located in the previous submissions location. As per the Erbsville Environmental Study, May 2018, 672 Erbsville Road is to be developed in conjunction with the subject property, with the SWM facility designed to accommodate both properties. a. SWM pond property should be designed to allow for proper access for maintenance purposes. No clear access shown on submitted plan. b. Target flows for the 2-year storm event appear to be miscalculated. Review and revise. c. SWM Facility outlet orifice shows invert of 348.90m, and the control orifice discharge shows an elevation of 349.65m. Confirm design of outlet structure. d. Extend detention storage volumes in Table 6 differs from what is provided.	Given the existing topography, it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville. Acknowledged, accesses are shown on the updated plans. New SWM design provided to support the two Pond concept. New SWM design provided to support the two Pond concept. New SWM design provided to support the two Pond concept.
71.	Internal preliminary assessment of the sanitary capacity, having a proposed discharge of 7.0 L/s: a. 2029 projected 'post-development' modelling indicates the sanitary sewer downstream of the proposed development appears to have capacity available during wet weather scenarios	Updated calcs for the revised Site Plan have an estimated site discharge flow of 4.98 L/s. This is less than the previous flow estimate of 7.0 L/s and thus capacity is not an issue.
72.	Further details will be required during the Site Plan process and detailed design stage for review and acceptance from the Engineering Division	Acknowledged
	7. Landscape Review	
73.	General landscape architectural comments for consideration, applicable at the Site Plan stage and detailed design stage are outlined below:	Acknowledged.
74.	Include a Vegetation Management Plan and Landscape Plan. Be sure to include trees within 6m of property (i.e., existing street trees to be preserved).	Acknowledged. To be provided as part of site plan and detail design.
75.	A Vegetation Management Plan must be undertaken and approved prior to removal of any vegetation on site	Noted, to be provided through detailed design.

76.	The City recommends replacement rate of trees to be removed is at a ratio of 2:1. The applicant is encouraged to maximize tree planting wherever possible on site.	Noted, to be provided through detailed design.
77.	Provide a landscape design that will enhance and strengthen the streetscape quality along Erbsville Road including but not limited to street trees, enhanced planting and paving, site furnishings, etc	Noted, to be provided through detailed design. A Preliminary Landscape Plan is provided in the revised Urban Design Guidelines.
78.	Landscape design must comply with the City of Waterloo's accessibility guidelines to ensure adequate provisions for accessibility.	Noted, to be provided through detailed design.
79.	Further details will be required during the Site Plan process and detailed design stage of review and landscape acceptance.	Noted
	8. Transportation Services	
80.	Transportation Services forecast increased demand for limited on-street parking spaces on the neighbouring streets, and recommend that sufficient parking be provided on-site to meet the regular demands of the residents, and visitors without reliance on municipal on-street parking. Transportation Services does not support the reduced visitor parking rate for the following reasons: o There are no alternatives for visitors to park nearby the site, see below for nearby on-street parking restrictions: ▪ 3 Hour parking restriction on Regal Place (across a regional arterial road with no crossing facilities) with limited spaces for parking ▪ 3 Hour parking restriction on Forest Gate Crescent (500 metres away from the proposed development) o The closest transit service is approximately 700 metres south of the proposed development o There are no dedicated cycling infrastructure along Erbsville Road north of Laurelwood Drive o There are no dedicated pedestrian infrastructure along Erbsville Road north of Forest Gate Crescent.	Acknowledged. Please refer to the revised concept plan and zoning by-law amendment. The zoning standards for resident and visitor parking are now being met on-site.
81.	Transportation Services recommend additional parking be explored on site.	Acknowledged. Please refer to the revised concept plan and zoning by-law amendment. The zoning standards for resident and visitor parking are now being met on-site.

82.	Transportation Services have reviewed the provided transportation impact study. At this time, there are no remedial measures required because of the development at 720 Erbsville Road.	Acknowledged
83.	Transportation Services request a sidewalk along the frontage of the site.	Please refer to the revised concept plan. The internal sidewalks are proposed to extend to Erbsville Road. A 2.1 metre road widening is being conveyed to the Region of Waterloo for the future widening of Erbsville Road. The Region has not requested that the owner install a sidewalk on Erbsville Road, but the Region is planning to resurface the Road in 2026.
84.	Please verify the Erbsville Road road widening with the Region of Waterloo.	A 2.1 metre road widening is identified on the revised concept plan in accordance with comments received from the Region of Waterloo.
Region of Waterloo		
	Water Services	
85.	The Functional Servicing and SWM Report prepared by IBI Group dated October 2021 does not adequately show that the existing water infrastructure can support the proposed development. The fire flow calculations are not consistent with the proposed development. For example, the largest row townhouse site contains 6 units, and the architectural drawings show it to have an area of 548m2. The FUS fire demand calculations do not contain the calculations for the largest building.	The water distribution analysis in the revised FSR has been updated per the revised Site Plan and the City comments. The analysis shows the site can be adequately serviced.
86.	Furthermore, assumptions made in the fire flow demand estimation provide for a non-combustible occupancy. Contents of residential dwellings are considered regular combustible, and typically no reduction for occupancy is appropriate. With the corrected fire demand calculations, the largest building(548 m2) requires 200 L/s (3,170 gpm).	The water distribution analysis in the revised FSR has been updated per the revised Site Plan and the City comments. The analysis shows the site can be adequately serviced.
87.	The available flow from the hydrant test is shown to be 1705 gpm (107 L/s) @ 50 psi. The consultant is required to calculate the estimated available flow at 20 psi using the NFPA 291 Handbook.	The water distribution analysis in the revised FSR has been updated per the revised Site Plan and the City comments. The analysis shows the site can be adequately serviced.
88.	It is anticipated that the consultant will discover that the available flow from the existing infrastructure will be less than the required demand. The results may be a change in the proposed site plan orientation, recommendations for fire walls, less units per building, etc.	The water distribution analysis in the revised FSR has been updated per the revised Site Plan and the City comments. The analysis shows the site can be adequately serviced.

89.	Alternatively, there may be additional watermain infrastructure required in order to service the proposed development. The City and Region have dual ownership watermains planned for the area along Erbsville Rd, Conservation Drive, and Beaver Creek Rd in order to service the Beaver Creek Meadows District Plan area. The watermain installation is currently budgeted for 2024/2025. Depending on the timing of development of the subject lands at 720 Erbsville, the site may benefit from the additional looping of watermains.	The water distribution analysis in the revised FSR has been updated per the revised Site Plan and the City comments. The analysis shows the site can be adequately serviced.
	Hydrogeology & Water Programs (Source Water Protection)	
90.	The property 720 Erbsville Rd is within Wellhead Protection Sensitivity 8 as designated on Map 6a of the Regional Official Plan. The purpose of the designation and policies contained in Chapter 8 of the ROP is to protect long-term municipal groundwater supplies. Hydrogeology and Water Programs staff will require a Salt Management Plan prior to site plan approval for this development.	Acknowledged.
	Record of Site Condition (RSC)	
91.	The MHBC cover letter of December 20, 2021 acknowledges a RSC has not been submitted with the applications. Region staff can support securing completion of the RSC and submission of the same along with the MECP acknowledgement to the Region, through a holding provision in the proposed zoning by-law amendment.	Acknowledged.
	Noise Study	
92.	Corridor Planning staff has reviewed the Noise Report for the proposed residential development at 665 & 720 Erbsville Road, City of Waterloo, prepared by IBI Group, dated October 2021. The Report has assessed traffic noise from Erbsville Road. Based on the excess road noise levels and nature of the development, the following mitigation will be required:	Acknowledged.
93.	**Ventilation (All Units)** Provision for installation of central air conditioning will be required for all units in the proposed development, including forced air ventilation systems with ductwork sized for future installation of central air conditioning systems by the occupant. The location installation and sound rating of the air conditioning device should comply with NPC-216, Residential Air Conditioning Devices. The provision for adding central air conditioning systems and window and building construction meeting the minimum requirements of the Ontario Building Code (OBC) will provide adequate sound insulation for the proposed building and will exceed this requirement.	Acknowledged.
94.	**Warning Clause (All Units)**	Acknowledged.

	The owner will be required to enter into an agreement with the Region of Waterloo / City of Waterloo to include noise warning clauses in the offers to purchase and/or rental agreements for all dwelling units, and in the declaration of any future plan of condominium as follow: "This dwelling unit has been designed with the provision for adding central air conditioning at the occupant's discretion. Installation of central air conditioning by the occupant in low and medium density developments will allow windows and exterior doors to remain closed, thereby ensuring that the indoor sound levels are within the sound level limits of the Municipality and the Ministry of the Environment." Prior to the issuance of building occupancy permits for this development, the Municipality's building inspector or a Professional Engineer qualified to provide acoustical engineering services in the Province of Ontario to certify that the recommended noise control measures have been properly installed and constructed. The above may be secured by way of conditions of draft approval for the condominium application.	
95.	**Stormwater Management & Site Grading** Region staff have undertaken review of the Functional Servicing and SWM Report dated October 2021 authored by IBI Group, and generally have no concerns. Under detailed engineering design, a Lot Grading, Site Servicing plans and a Stormwater Management Report will be required at the site plan application stage for this development. Please email all pertinent plans and reports; no hard copies are requested. The site must be constructed and graded in accordance with the approved plans, and the Regional Road allowance must be restored to the satisfaction of the Regional Municipality of Waterloo. Please note that any new servicing connection(s) from the Regional right-of-way would require Regional approval through a separate process of Municipal Consent and Regional Work Permit. A Region of Waterloo Work Permit must be obtained from the Region prior to commencing construction within the Region's right of way. In this regard, please visit https://rmow.permitcentral.ca/ for further guidance. This may be deferred to Site Plan Application stage.	Acknowledged.
96.	**Regional Road Dedication** The Region's Official Plan identifies Regional Road 70 (Erbsville Road) with a designated road width of 30.480 metres. Staff estimates that an approximate road widening of 2.10 metre will be required along the Erbsville Road frontages of the subject properties (up to Schnarr Street). The Owner/Applicant must engage	Acknowledged.

	an Ontario LandSurveyor (OLS) to prepare a draft reference plan which illustrates the road widening prior to registering the reference plan, the OLS should submit a draft copy of the plan to the Transportation Planner for review. The land must be dedicated to the Region of Waterloo for road allowance purposes, and must be dedicated without cost and free of encumbrance. This may be deferred to Site Plan application stage.	
97.	**Access Permit/TIS/Access Regulation** Region staff has undertaken review of the Transportation Impact Study titled "665 & 720 Erbsville Road Transportation Impact Study" dated July 2022 submitted by Paradigm Transportation Solutions Limited, and generally concur with the recommendation therein. Region comments will be forwarded later under separate cover. Please note that proposed accesses to Regional Road 70 (Erbsville Road) will require a Regional Road Access Permit ($230 fee) https://forms.regionofwaterloo.ca/ePay/PDLSOnline-Payment-Forms/Commercial-Access-Permit-Application . The access must comply with the Regional Access Policy in design i.e. minimum width 7.6 metres; 6.0 metres turning radii. This may be deferred to Site Plan Application Stage.	Acknowledged. Please refer to the updated concept plan which identifies access widths that exceed 7.6 metres.
98.	**Transit Planning** There are currently no plans to extend transit service to those sections of the proposed development and along this section of Erbsville Road. Any transit requirements and needs for the extension of transit services would be identified at a later stage once more detailed plans for the proposed development on the subject lands are available.	Acknowledged
99.	**Fencing** Any back lotted residential developments may require a 1.8 m black vinyl fence, to be erected at the developer's cost, on the Region's property.	Acknowledged. Fencing details will be provided during the site plan process.
	Environmental Planning	
100.	There are some items that will require clarification before the EIS can be ultimately accepted, as well as confirmation of MECP input on the Species at Risk, and confirmation on design/layout of the site. Until such time as the items below are addressed completely, environmental planning staff will not be in a position to support the approval of any of the applications. Once feature limits and buffers are confirmed, then the Official Plan Amendment and Zoning By-law Amendment applications may be supported. In order for the Draft Plan of Condominium to be supported, all of the items Identified below will be required to be addressed. The applicant is invited to contact and Gurney (Senior Planner – Environment,	Acknowledged. Note: MECP no longer provides input or recommendations unless an IGF has been submitted. An updated IGF will be submitted to MECP that includes the confirmed design. It is recommended that confirmation of requirements from MECP be a condition of approval.

	jgurney@regionofwaterloo.ca) for further information or clarification on the following.	
101.	Buffers – the text of the EIS refers to smoothing of buffers, however the labeling of the buffers on the figures appears to indicate that the minimum buffers are applied throughout the site. Based on review of the figures in the EIS as well as the Draft Plan of Condominium, there appear to be areas where the buffers do not actually meet the minimum requirements. An updated figure which includes the feature limits (see note below), associated buffers, and proposed site layout would be appreciated. This figure should also identify areas where buffer minimums are not met.	The EIS maps and report have been updated to clearly show the buffers and development limits. Mitigation measures to ensure these encroachments do not negatively impact the features are included in Sections 6.3.1, 6.3.2, 6.3.3, and 6.3.4, related to direct impacts.
102.	Wetland delineation – it is understood that an updated confirmation of the wetland limits is required. If there are changes in the wetland limits, updated mapping and associated buffers will be required.	The wetland limits were confirmed with GRCA (Robert Messier) on June 12, 2023 and have been incorporated into the development plans and EIS mapping.
103.	General design – the figures appear to show some encroachment into the feature limits and floodlines (as per our current mapping). Confirmation of the wetland and floodline depicted throughout the submission is required through the GRCA.	The EIS maps have been updated to include the current floodlines. The development does not encroach within wetland limits.
104.	The site appears quite tight, and it is not clear how or where snow storage will be accommodated, and if there will be any associated impacts to the adjacent Core Environmental Features; the EIS should be updated to address this.	Snow storage locations will be identified during the detailed design and site plan stage. If appropriate snow storage locations can't be identified, snow will be taken off site.
105.	If a trail is proposed within the site, the EIS will need to reflect this.	The EIS has been updated to include recommendations for future trail alignment. A more comprehensive analysis of trail impacts will be provided through detailed design, once the final layout and design is known.
106.	It is anticipated that access to the adjacent Core Environmental Features and the trail network proposed in the subdivisions to the east may invite encroachment through the feature, including through the southern portion of the feature where it is narrower. Please provide additional information as to how the Core Environmental Features adjacent to the site will be protected through the proposed mitigation measures and an assessment of the mitigation measures, especially as they relate to the rear of the units abutting the features (Units 1-43).	The Induced Impacts section of the EIS has been updated to include mitigation measures for encroachment.
107.	Bats – There is a reference in Sections 4.3.3.2 and 5.2.3 of the EIS to potential bat habitat in a building northwest of the site, but which is not proposed to be altered or demolished as part of the proposed development. Please clarify which	The house proposed for demolition has been identified on the EIS maps in this resubmission. Bat habitat assessments and exit surveys were completed (see Section 3.1.5 for methods) and no

	structure this is; it is appears that this may be the house that is within the subject property (opposite the intersection of Erbsville and Shnarr), and which is in an area that is likely to be impacted by the proposed stormwater management facility and associated green space. If the house is to be removed, please ensure that the EIS, including Map 5, is updated accordingly and any associated correspondence with MECP is provided.	bats were found to be utilizing the house or its addition (see 4.3.3 for results). It is anticipated that this house will be removed. Map 6, which shows the proposed development, has been updated to show the house to be removed. No correspondence with MECP is required.
108.	Blanding's Turtle – MECP input is pending, and until such time as it is received, regional environmental planning will not be able to support the draft approval on the subject lands.	An updated IGF will be submitted to MECP which includes the latest development concepts and additional information such as ecological enhancement plans, tree inventory, trail alignment, etc. It is recommended that the input/approval from MECP be a condition of approval.
109.	With regard to the overlap between the proposed development area and the Category 2 Blanding's habitat, consideration should be given to the potential restoration and enhancement of this area rather than the exclusion and use of the area for development related purposes.	The EIS has been updated to include discussion of the mitigation measures for ensuring no harm to Blanding's Turtle. An ecological enhancement plan is recommended, to provide additional habitat for Blanding's Turtle (see Section 6.3.3).
110.	Permanent exclusion fencing (for turtles) does not appear to be recommended other than around SWM facility. Given the approach on the adjacent lands it would seem an appropriate measures to ensure that there are not turtles inadvertently directed to this site due to being restricted from adjacent sites would be appropriate. If exclusion fencing is not being proposed around the limits of the environmental features and Blanding's habitat, please provide additional explanation as to why the use of exclusion fencing is not appropriate on the subject site.	The EIS has been updated to include discussion of the mitigation measures for ensuring no harm to Blanding's Turtle. An ecological enhancement plan is recommended, to provide additional habitat for Blanding's Turtle (see Section 6.3.3).
111.	As noted above, MECP input is required in advance of draft approval or final design acceptance.	An updated IGF will be submitted to MECP which includes the latest development concepts and additional information such as ecological enhancement plans, tree inventory, trail alignment, etc. It is recommended that the input/approval from MECP be a condition of approval.
	Archaeology	
112.	Regional Cultural Heritage staff have received and reviewed the document titled: "Stage 1-2 Archaeological Property Assessment: 720 Erbsville Road, Waterloo" (AMICK, Aug. 23, 2022) and the associated Ministry Acknowledgement Letter.	Acknowledged.

	The area of land subject to the proposed plan has been cleared of archaeological concern, however, the applicant and the City should be made aware that the lands identified on the Draft Plan of Standard Condominium (last revised Dec. 17, 2021) as "Additional Lands Owned by Applicant" continues to possess the potential for the recovery or archaeological resources. Any proposed use of these lands must be preceded by an Archaeological Assessment before any ground altering activities of any kind are permitted.	
	Housing	
113.	The Region supports the provision of a full range of housing options, including affordable housing. Should this development application move forward, staff recommend that the applicant consider providing a number of affordable housing units on the site, as defined in the Regional Official Plan. Rent levels and house prices that are considered affordable according to the Regional Official Plan are provided below in the section on affordability.	The proposed development will not include affordable housing units, but the townhouse and stacked townhouse built form proposed will provide an alternative housing form to Erbsville area and represent a more affordable housing form than the surrounding single detached dwellings.
114.	Policy 3.A.6 in the Regional Official Plan (ROPA 6) applies to this site. It states: "Where a development application proposing residential uses is submitted for a site containing one hectare or more of developable land, the Region and the area municipalities will require, a minimum of 30 percent of new residential units to be planned in forms other than single-detached, semi-detached, and street fronting and single unit condominium townhouse units. Examples of other potential housing forms may include, but are not limited to: duplexes; tri-plexes; four-plexes; multi-plexes; stacked and back-to-back townhouses; and apartments." A review of the proposed unit types on the Draft Plan of Condominium indicates that this proposal adheres to Policy 3.A.6.	Acknowledged.
Grand River Conservation Authority		
115.	After reviewing the submission, the GRCA requires confirmation of the floodplain and wetland limits, as well as some stormwater management details prior to recommending approval of the applications.	Acknowledged.
	Engineering	
116.	1. Please confirm how regulatory flood line was determined. Provide a topographical survey with flood elevation(s) and vertical datums notes.	GRCA has provided floodplain cross sections and these were plotted onto the topographical survey to locate the limit of the floodplain. Refer to the Functional Grading Plan.

117.	2. Please provide a section and sizing calculations for the infiltration swale, and demonstrate how infiltrations targets are being met.	Included in revised drawings,FSR and SWM report.
118.	3. The target flows for 2 year storm appear to be miscalculated. Please review and review.	The FSR and SWM report have been updated per the revised Site Plan and the City comments.
119.	4. The Stage-Storage-Discharge relationship for SWM facility notes that the 150mm outlet orifice has an invert elevation of 349.65 meters. Please clarify the design of the outlet structure.	The FSR and SWM report and functional engineering drawings have been updated per the revised Site Plan and the City comments.
120.	5. Table 6 indicates a required extended dentation storage volume of 955 cubic metres. However it appears only 93 cubic metres of storage appears is provided.	The FSR and SWM report have been updated per the revised Site Plan and the City comments.
121.	6. As requested during the Environmental Impact Study Terms of Reference stage on January 27, 2021, we wish to re-verify of the wetland boundary. This is due to the length of time since the last GRCA verified wetland staking August 18, 2014), the length of time since finalization of the 2018 Erbsville South Environmental Study (May 11, 2020). Please reach out to the GRCA during the 2023 growing season (May to September) to complete this. Updated wetland limits and applicable buffers must be indicated in a revised EIS and on all plans, noting the date GRCA verified the boundary.	The wetland boundary has been confirmed by GRCA staff (Robert Messier) on June 12, 2023. Map 4 in the revised EIS shows the updated wetland boundary, which has been incorporated into the updated concept.
122.	7. Please provide a feature-based monthly water balance calculation for the wetlands and Laurel Creek.	Provided in SWM report.
123.	8. Laurel Creek is a coldwater receiver. Please incorporate thermal mitigation measure and confirm how temperature targets outlined in the subwatershed report will be maintained. Other water quality parameters discussed in B8.4 of the subwatershed report should be discussed in the SYM plan, as well as proposing a monitoring plan for the effectiveness of the proposed mitigations.	Provided in SWM report. The EIS provides recommendations for pre-, during-, and post-construction monitoring to ensure water qualitied targets will be met.
	Advisory / Detailed Design Comments to the Applicant	
124.	A. If retaining walls are to be used, the applicant should ensure that maintenance and repair needs of retaining walls is considered during detailed design, and will be possible without impacting the 30 metre wetland buffer.	Acknowledged. Note, the functional grading does not identify a current need for retaining walls.
125.	B. Section 6.4 of the EIS indicated that active infiltration measures are feasible for this property. GRCA staff encourage the use of these measure where possible.	Acknowledged. Infiltration facilities are proposed for roof water.

126.	C. Planned snow storage locations should be illustrated on site plan drawings and located as far as possible from the wetland and stormwater drainage intakes.	Acknowledged. Snow storage locations will be identified at the site plan stage.
	Advisory Comment to the City	
127.	The proposed SWM facility location is not consistent with the conceptual location shown in the Erbsville South Block plan and supporting Erbsville Environmental Study (IBI et al., May 2018). The latter document indicates that the adjacent property (672 Erbsville Road) must be developed in conjunction with the subject property, and the consequently they must share the same SWM strategy. The Erbsville South Environmental Study recommends one SWM facility for both parcels at the southeast corner of the subject property and/or within 672 Erbsville Road.	Given the existing topography, it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
Trillium Estates Limited		
128.	We wish to provide our initial comments regarding the planning applications for the above noted property. Trillium Estates Limited (Trillium) owns lands immediately to the south of the Sunvest property and are addressed as 672 Erbsville Road. This block of land is part of a previously approved plan of subdivision 30T-90039 that extends to the south and south east of these lands.	Acknowledged.
129.	Our lands measure 0.79 hectares (1.96 acres) in area with approximately 89 metres of frontage on Erbsville Road. The lands are designated as Low Rise Residential and zoned Holding Residential Eight (H) R8 under Zoning By-law 2-18-050. Development of these lands has been delayed pending completion of the Erbsville Community block Plan as set out in Specific Provision 3 of the Official Plan.	Acknowledged.
130.	We have reviewed a number of the reports and plans submitted for 720 Erbsville Road that are available on the City's website. More specifically, we have reviewed the Planning Report and Functional Servicing and SWM Report and have identified a number of concerns that warrant further discussions with the applicant and City staff.	Acknowledged.
131.	At the time the Trillium lands were draft plan approved, it had not yet been determined when this block of land was to be serviced and how access was to be provided. As such, one of the conditions of draft plan approval stipulated that	Acknowledged. Please refer to the updated concept plan and grading plans. The revised concept includes a possible road extension to the Trillium lands, and a stormwater pond in the south east corner, which will be shared with the Trillium Lands.

	Trillium lands were to be developed in conjunction with the adjacent lands (Sunvest parcel) unless it could be demonstrated that separate access could be constructed. In addition, the expectation was that both parcels would need to co-ordinate servicing and stomwater management measured given that the management facility would be located at the southeast quadrant of the shared properties, primarily located on the Trillium Lands. Further, the Block Plan anticipated that a road connection would be provided through 720 Erbsville Road to ensure that 672 Erbsville Road could be developed, should a separate access onto Erbsville Road not be permitted.	
132.	We have been in consultation with Sunvest over the last few years in order to co-ordinate development plans. We were provided with several preliminary site plans for the proposed development on their lands, which showed a driveway connection to our property. However, we were not provided with any servicing or grading plans to show how these concept plans would be implemented.	Acknowledged. Please refer to the updated servicing and grading plans.
133.	In reviewing the planning and engineering reports, we wish to outline a number of concerns as listed below:	Acknowledged.
134.	The Planning Report (pg. 7) states that "immediately to the south of the subject lands is open space, and further south is the Forest Gate subdivision comprised of single detached dwellings. This is not correct, the lands immediately to the south is the Trillium site, which is designated and zoned for residential development.	Acknowledged. The Planning Report was noting the existing use of the Trillium lands, but it is acknowledged that the Trillium Site is zoned for residential development, subject to a holding provision. The updated concept plan provides opportunities to extend infrastructure from 720 Erbsville Road to the Trillium site.
135.	Figure 4 in the Planning Report shows Schedule A6b of the Official Plan and clearly identifies the location of the stormwater management facility on the Trillium lands immediately adjacent to the Sunvest property limit. This is in recognition that the combined lands generally drain to this location based on existing topography.	Acknowledged. Please refer to the updated concept plan which identifies a stormwater pond at the south east corner of the subject lands.
136.	Section 4.5 of the Planning Report deals with the Erbsville South Block Plan and indicates that the Storm Water Management Facility and the retained natural area will provide a buffer to the lands to the north. There is no mention that the location of the SWM facility is not in accordance with the Block Plan.	Acknowledged. Please refer to the new stormwatrer management pond locations proposed. Due to the site's existing topography it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north and one in the south. The southern Pond will be shared with 672 Erbsville.

137.	The Planning Report indicates that the Sunvest lands will be developed with a private road system that will provide a connection to the southern lands (Trillium lands) that will be developed separately. Further discussion between landowners, the City and Region will be necessary to deal with the shared road system given that the Sunvest lands are to be developed by way of condominium.	Acknowledged.
138.	Section 4.5.5 of the Planning Report states that the swm facility is located on the northern edge of the draft plan of condominium and that the swm strategy will meet the requirements of the Block Plan and the Erbsville South Environmental Study. Based on our review of the block plan and the EIS, we do not agree this approach meets the requirements, as there was to be a shared SWM at the southeast portion of these parcels.	Acknowledged. Please refer to the new stormwatrer management pond locations proposed. Due to the site's existing topography it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north and one in the south. The southern Pond will be shared with 672 Erbsville.
139.	In order to direct drainage towards the northerly location on the proposed SWM facility, the Sunvest lands will have to be extensively graded and filled to redirect drainage in the opposite direction. This is addressed further in the MTE letter, which is attached, but we do not agree that the proposed SWM strategy meets the objectives of the Block Plan.	Acknowledged. Please refer to the new stormwatrer management pond locations proposed. Due to the site's existing topography it is not feasible to drain the entire property to the south. However, we have now proposed two SWM Ponds – one in the north and one in the south. The southern Pond will be shared with 672 Erbsville.
140.	Section 5.2 of the Planning Report speaks to the Functional Servicing and Storm water management design for the Sunvest lands. There is no discussion regarding the extensive site grading and site alterations that are required to accommodate this storm water management strategy and the impacts on the Trillium lands.	The Grading strategy for the site has been revised. It is noted that given the existing topography, it is not feasible to drain the entire property to one SWM pond located in the south. Consequently, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
141.	In general, we found that the Planning Report did not adequately address how the Sunvest lands and the Trillium lands are to be developed in conjunction with each, should that be necessary. Further discussions will be needed to ensure that unobstructed access is provided over the Sunvest lands and how that will be	Acknowledged. Discussion between Sunvest and Trillium have been ongoing and will continue. The revised concept plan improves the coordinated development of the two properties.

	addressed through the condominium process. While this may ultimately not be an issue of concern, there needs to be more consultation between property owners and approval authorities to ensure that there is a workable solution.	
142.	The more significant concerns are related to the Functional Servicing and SWM Report prepared by IBI Group. We have retained MTE Consultants to review and provide comments on this report and their initial review letter is attached.	The Grading strategy for the site has been revised and the site now better matches into the Trillium lands. The southern SWM pond facilitates this. Note, also that the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
143.	In summary, we have concerns with the proposed grading and drainage design that will result in a substantial increase in grades along the common property line in excess of 3.0 metres in places. The IBI report illustrates that this increase in fill and grades can only be accommodated by grading onto our lands. This is unacceptable as it relies on altering grades on the Trillium lands without our permission. Further, it results in steep slopes that render our lands unsuitable for development and greatly alters the proposed drainage pattern contrary to the approach outlined in the Block Plan.	The Grading strategy for the site has been revised and the site now better matches into the Trillium lands. Note, also that the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
144.	There is no discussion in the IBI report regarding the proposed SWM facility in the southeast portion of these combined land holdings. There was no consultation with Trillium prior to submitting the report to the City despite the fact that they are proposing to raise grades significantly along the property line and extend grading onto our lands.	The Grading strategy for the site has been revised. It is noted that given the existing topography, it is not feasible to drain the entire property to one SWM pond located in the south. Consequently, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.
145.	Further discussions are required on the proposed grading and swm strategy to ensure that the plans conform to the Block Plan and as a minimum have no impact on the Trillium lands.	The Grading strategy for the site has been revised. It is noted that given the existing topography, it is not feasible to drain the entire property to one SWM pond located in the south. Consequently, we have now proposed two SWM Ponds – one in the north (SWM Pond A) and one in the south (SWM Pond B). This configuration allows us to best match the existing topography of the site which

		has an existing drainage divide running east-west through the central portion of the site. Note, the southern Pond (SWM Pond B) will ultimately be shared with 672 Erbsville.