MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

July 16, 2025

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

Dear Rita Szilock,

RE: Planning Justification Report Addendum #3
Official Plan Amendment and Zoning By-law Amendment Applications
720 Erbsville Road, Waterloo
CITY FILE: Official Plan Amendment No. 45 & Zoning By-law Amendment Z-22-15
OUR FILE: 0977D

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

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

Stormwater Management Pond
Following discussions with City staff, the stormwater management pond area is now proposed to be zoned as Residential Eight (R8) to allow for greater flexibility during the detailed Site Plan stage. This approach will accommodate future refinements to the stormwater pond design in response to detailed servicing and grading requirements. Any portion of the stormwater pond located within the environmental buffer limit will remain zoned as Open Space (OS3). The revised zoning schedule reflects this and has been included in this resubmission.

Official Plan Amendment
City staff have requested that the stormwater management pond and access, as well as the proposed park block, be conveyed to the City. Based on the reduced private development area as identified on the Proposed Ownership map, an additional Official Plan Amendment is required to recognise the increased density of the development when measured across the reduced private condominium lands. As a result of the revised ownership scheme, the development's density will only be measured across

the condominium lands, not lands held in City ownership. A slight increase in development density is requested to accommodate the reduced condominium area. Within the Low Density Residential designation, the density of development on one site shall not exceed 150 bedrooms per hectare and an increase to 155 bedrooms per hectare is requested. The overall density of the proposed development has not changed, and the same number of units and bedrooms is proposed from the last submission. The only change is the area of land, which the density can be measured against.

Zoning Setbacks

The deck provisions have been revised to allow a deck to extend up to 2 m from a rear lot line, where the by-law currently permits a deck to extend up to 4 metres from a rear lot line. To ensure adequate space for landscaping, drainage, and access, the proposed 2 m setback will apply to both the deck platform and associated stairs. This reduction to the required deck setback adjusts for the smaller rear yards proposed. No further reductions are being requested. The other general provisions for decks will continue to apply. This request is applicable to a minor number of units.

The Region has advised that an increased road widening width is required along the Erbsville Road frontage. The requested road widening has increased from 2.1 metres to 3 metres. As such, the setback of the proposed stacked townhouse units will be reduced from 5.0 metres to 4.1 metres. A reduced street line setback is requested from Erbsville Road to permit a 4.0 metre building setback. This reduced setback is administrative to accommodate the Region's increased road widening requirement, and the proposed location of the stacked townhouses has not changed. The reduced setback is appropriate as it will help the stacked townhouse units address the public street and increase interaction between the private and public realm.

Fencing & Accessory Uses

The previously proposed zoning by-law amendments relating to fencing and prohibiting accessory buildings within a yard abutting a public highway are no longer being requested. Fencing is regulated through the City of Waterloo's fence by-law, and therefore, an amendment through the City's zoning by-law is not needed. Additionally, as the subject lands are not backlotted and have frontage onto Erbsville Road, a substantive fence would not be permitted. The amendment to prohibit accessory buildings is also not necessary, as Policy 3.A.1.c.) already prohibits accessory buildings and accessory structures in front and flankage yards.

Transportation Impact Study

The Region has requested a holding provision for an addendum to the 2022 Transportation Impact Study (TIS) to be completed to the satisfaction of the Region of Waterloo prior to the lifting of the holding provision. Correspondence has been provided to the Region to request that no "H" provision be included, given the timing of development and the planned improvements to Erbsville Road.

The requested 3.0m road widening along the frontage of Erbsville Road between Keats Way to Schnarr Street and the 4.5m road widening from Schnarr Street to Conservation Drive has been included in the concept plan.

Geothermal Energy Systems
The proposed development does not intend to include geothermal energy systems as part of the proposed development. As such, a site-specific provision is to be added to prohibit geothermal energy systems unless supported by appropriate studies and approvals through a future application process.

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

- Minimum interior lot line setback abutting the OS1 and OS3 zone of 3.6 metres
- Minimum rear yard setback abutting the OS3 zone of 5.0 metres
- Maximum building height of 12m for Stacked Townhouse blocks
- Minimum Street Line Setback of 4m
- Prohibit the use of geothermal energy systems unless supported by appropriate studies
- Notwithstanding section 3.D.2.6, decks and associated stairs are prohibited within 2.0 metres of the Rear Lot Line.

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

Yours truly,

MHBC



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Partner



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