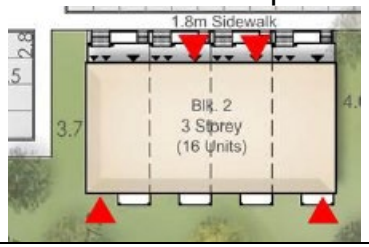
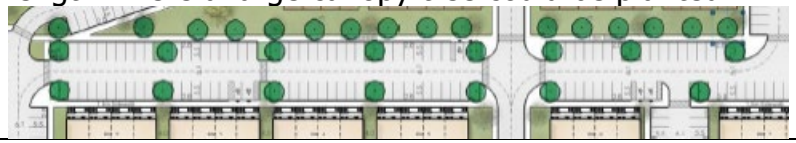
720 Erbsville Road 2nd Submission Post Circulation Comments March 24, 2025		
	Comments	**Responses**
City of Waterloo		
	1.0 Erbsville South Block Plan (SPA 3)	
	1.1 Built Form	
1.	The intent of the Erbsville South Block Plan is to provide for development that will maintain and enhance the character of the former Erbsville settlement as a low-rise residential area. Staff acknowledge that by limiting the stacked townhouses to 4 units wide the overall scale of the development has been reduced, and is more consistent with the intent of the Block Plan in general. Further, while the stacked townhouses remain 4 units tall, the updated Urban Design Guidelines note that from street level, the townhouses appear to be 3-storeys tall, with the basement units located mostly underground, which is consistent with the design intent of the Block Plan (low density characteristics).	Acknowledged.
2.	Based on staff's review of the revised proposal, the stacked townhouses along Erbsville Road appear to turn their backs to Erbsville Road, with no prominent front doors along Erbsville Road. The Erbsville South vision, policy 11.1.3 (2), states that development shall have a pedestrian-oriented built form. Further, as per policy 11.1.3 (3)(b)(v), one of the Built Form Guiding Principles, states that developments should be designed to face Erbsville Road, where feasible. Additionally, Policy 11.1.3 (25) (b) states that buildings that face Erbsville Road will demonstrate high quality architectural design/treatment, including prominent entries and porches". Lastly, policy 11.1.3(32), states that when a development proceeds via a plan of condominium, a number of policies shall apply include that "Condominium dwelling units shall not back onto public streets".	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road.

3.	As currently designed, the stacked townhouses turn their backs to Erbsville Road and do not appropriately address the above noted Erbsville South Block Plan policies. In order to ensure that the proposed development appropriately addresses the above noted policies staff request that the proposed development be redesigned to include prominent front entrance doors along Erbsville Road to ensure that the proposed stacked townhouses face Erbsville Road rather than turning their backs to the road.	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road.
	1.2 Mobility Principles and Sidewalk along Erbsville Road	
4.	In regard to mobility, the Erbsville South Block Plan places a high degree of importance on creating a walkable and accessible community, as outlined in policies 11.1.3 (3) (c) (i)-(vi) of the Erbsville South Block Plan. Staff acknowledge that the inclusion of the trail connection that wraps around the northern, eastern and southern portion of the proposed development addressing some of the Mobility Principles outlined within Block Plan. However, to allow future residents to safely walk along the Erbsville Road frontage and to avoid backtracking, staff request that the applicant revise the development concept and incorporate a sidewalk along Erbsville Road. The trail connection, the internal sidewalks and walkways to front doors should all connect to the sidewalk on Erbsville Road.	Please refer to the revised concept plan. Land is proposed to be conveyed to the Region for a 2.1 metre road widening. The Region of Waterloo has identified that this section of Erbsville Road will be rehabilitated in 2028. Through review of the Region's Corridor Design Guidelines, it is noted that Erbsville Road is a Neighbourhood Connector – Avenue. This road type is to be designed to support active transportation including walking and cycling. A sidewalk connection has been proposed from the subject lands to the future active transportation facilities. A new sidewalk is not proposed on the Erbsville Road frontage through this development since a sidewalk on private lands would duplicate the active transportation infrastructure planned for Erbsville Road. The final location of the sidewalk will be determined through the future site plan application process.
	1.3 Open Space/Park Space	

5.	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.*	Please refer to the revised Concept Plan. A revised park area is proposed.
6.	The revised Master Plan identifies two (2) amenity areas and the response matrix (response no. 33) states that the two amenity areas are "open spaces that will be publically accessible from the internal sidewalk network". Based on this response it appears that the amenity areas as intended to be Privately Owned Public Spaces (POPS). Please confirm in resubmission and label plans accordingly.	Please refer to the revised Concept Plan. An area for public parkland is proposed.
7.	Staff note that in order to achieve an adequate provision of park space, in addition to a parkland dedication, the Erbsville South Block Plan allows for consideration of POPS (policy 11.1.3 (51)). The key stipulation of policy 11.1.3 (51) is that any POPS must remain publicly accessible and welcoming, and not be viewed as a private space. See policy 11.1.3 (51) below for reference. *(51) To achieve adequate provision of park spaces and trails, the City may consider Privately Owned Public Spaces (POPS) within the Erbsville South Block Plan Area as a condition of*	Please refer to the revised Concept Plan. An area for public parkland is proposed.

	development. Under all circumstances, such spaces shall be welcoming to the general public, and not viewed as "private".	
	2.0 Urban Design – Max Kerrigan	
	2.1 Backlotting	
8.	As per previous comments, staff had concerns that the proposed buildings are oriented away from the street with no entrances facing Erbsville. The Applicant responded indicating that vehicle access is limited, and that the proposed units will be designed as dual frontage. Staff continue to have concerns, as the addition of high quality materials and windows does not equate to "dual-frontage". In order to provide for a pedestrian-oriented streetscape, pedestrian oriented activities such as ingress and egress to buildings should occur. Staff recommend the addition of street facing entrances to the corner units of each 4-unit development block as per the marked plan below:  	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road.
9.	This important design consideration will then be further complemented by the "high quality materials, enhanced building design and extensive landscaping along Erbsville Road to enhance the public realm" as mentioned in the response matrix.	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road.
10.	It was also indicated that the Region would expect vinyl fencing to be provided where backlotting occurs. This is completely counter to the pedestrian-oriented vision for this area, and would not be supported by City staff.	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road. Backlotting is not proposed.

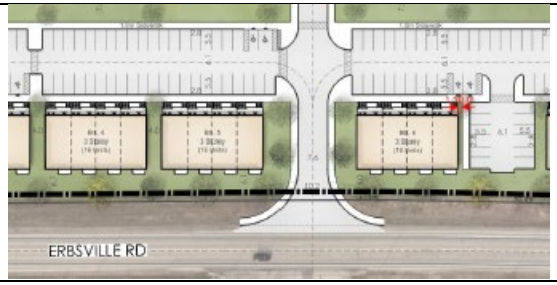
11.	Further, the open space between units and the Erbsville ROW should be treated as front yard where no fencing or sheds are permitted.	Please refer to the revised Concept Plan. Stacked Townhouse Units along Erbsville Road have been reoriented to provide ground floor entrances to Erbsville Road. Fencing and sheds will not permitted along Erbsville Road.
	2.2 Parking	
12.	In response to the inability to break the large parking area, staff would like to see an effort to reduce its dominance and align more with City objectives related to climate adaptation. In order to reduce heat-island effect, staff would like to see the inclusion of landscaped bump-outs every 12-15 spaces along its length where a large canopy tree could be planted. 	Please refer to the revised Concept Plan. Additional landscape bump-outs have been added to the parking areas. Further details related to the parking lot design will be determined through the future site plan application.
	2.3 Detailed Design for Site Plan	
13.	As per previous comments, the Urban Design Guidelines indicate that the townhouses will have "prominent building entrances", and "prominent front porches" when the widths of townhouses on the Master Plan will make this very difficult, as more than 50% of each townhouse front elevation will be garage doors at grade. In order to establish an improved pedestrian experience, please ensure that garages are recessed, the shared front porches extend beyond the front building façade and are complemented by large windows at grade. If not updated in the urban design guidelines, this may need to be a Council directive.	Please refer to the revised urban design guidelines. The building footprints on the concept plan are conceptual and the final building designs will be finalized through the site plan application process.
14.	As sidewalks are only being provided on one side of the most easterly road, staff request that the Applicant include a "safety strip" along the eastern side of that road where pedestrians (children in particular) would be able to walk, or retreat to in the event of a car coming down the driveway. This is of most important adjacent to Blocks 8, 9, and 10 where there is no	Acknowledged. The proposed private road right-of-way will be able to accommodate a "safety strip". The details for the private road design and safety strip will be determined through the future site plan application.

	sidewalk flanking the driveway, and if a resident would like to cross they have somewhere to walk to. We would like to see this for the extent of driveway where sidewalks are not proposed. 	
15.	See below example of this sidewalk alternative in a constrained space: 	Acknowledged.
	3.0 Zoning	
	3.1 Conservation (OS3) Zoned Lands	
16.	It is noted that the applicant would like to maintain ownership of the environmental lands and associated buffers. As mentioned previously the City's long standing practice has been to secure environmental lands and associated buffers in public ownership. Therefore, once again, staff request that the OS3 zoned lands be conveyed to the City prior to Site Plan approval.	The City's Official Plan does not require the conveyance of environmental lands, and the lands do not form part of the proposed development applications. The owner does not intend to convey the environmental lands to public ownership.
17.	3.1.1 Parkland Calculation Clarification Staff would like to clarify that whether the environmental lands and associated buffers are conveyed to the City does have an impact on how the required parkland dedication is calculated.	The environmental lands do not form part of the development area and do not contribute to the development's gross or net land area. The environmental lands will be severed from the development area through a reference plan at the time of site plan approval.

	As per the City's parkland dedication by-law the City is able to use the net land area (gross land area minus the land area of any environmental features and associated buffers that have been conveyed to the City) to calculate the 5% parkland dedication requirement if the owner will be conveying the environmental lands and their associated buffers to the City at no cost. See below for the City's parkland dedication by-law net land area definition: (13) **"net land area"** means the gross land area minus the land area of any environmental features and associated buffers within the gross land area that are being conveyed to the City at no cost;	
18.	Based on the information contained within the submitted Master Plan, prepared by MHBC Planning, dated October 12, 2023, the "net land area" is 30,552 sq. m. Therefore if the environmental lands and their associated buffers are conveyed to the City at no cost then the City's parkland dedication by-law requires a parkland dedication of 1,527.6 sq. m. (5% of 30,552 sq. m.).	Please refer to the updated concept plan for the new parkland area proposed.
19.	On the other hand, if the environmental lands and their associated buffers are not conveyed to the City then the City's parkland dedication by-law requires that the parkland dedication requirements be calculated using the gross land area (92,679 sq. m.). In this instance the 5% parkland dedication requirement would increase to 4,633.95 sq. m. (5% of 92,679 sq. m.).	The environmental lands do not form part of the development area and do not contribute to the development's gross or net land area. The environmental lands will be severed from the development area through a reference plan at the time of site plan approval.
	3.2 Residential Eight (R8) Zoned Lands	
20.	3.2.1 Interior Lot Line Setback	
21.	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	Acknowledged.

	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.	
22.	Interior Lot Line - Rear Yards The requested rear yard setback is 5 metres adjacent to the OS3 zone, whereas the by-law requires 7.5 metres. At this point staff require further informal to consider the appropriateness of the requested rear yard setback: 1. A Topographic Survey with flood elevations and vertical datum, as requested by GRCA and City Planning staff in the City's post-circulation letter dated April 17, 2023. a. It is not clear whether GRCA is accepting of the regulatory floodline shown on the submitted plans, which could potentially impact the OS3 zone limit. 2. An updated Condominium Plan clearly identifying unit boundaries and exclusive use areas. 3. Applicant should submit a plan and cross-section demonstrating that the 5 metres is sufficient space for a private amenity area, proposed raised deck, drainage, landscaping, access easement (if any), fencing and potential sheds. If there are no plans to include sheds in the proposed development please clarify in resubmission.	1. Please refer to the revised concept plan and grading plan for the flood line location. 2. The Condominium application is on hold until the Official Plan Amendment and Zoning By-law Amendment are approved. The Condominium plan will be revised once the zoning is finalized. 3. Please refer to the backyard cross-section drawing and Planning Justification Report addendum. Shed's will not be permitted within private backyard amenity areas.
23.	3.2.2 Deck Setbacks	Acknowledged.

	The applicant has requested that decks be permitted to be located up to 2 metres from the rear lot line, whereas the By-law prohibits decks within 4.0 metres of the rear lot line.	
24.	Staff are concerned that a 2 metre rear yard setback for decks will not leave sufficient room to accommodate an access easement for internal units, appropriate amount of space for landscaping, drainage, fencing and potential sheds. Staff request that the applicant reconsider this request and significantly reduce the proposed deck encroachment into the proposed 5 metre rear yard.	Please refer to the revised zoning by-law amendment. Sheds will not be permitted in the rear yards. 2 metres will provide sufficient space for an access easement, landscaping, drainage and fencing.
25.	Should a lesser amendment still be required to permit some of the decks to encroach within 4 metres of the rear lot line then staff request that the applicant submit an appropriate planning rationale justifying the request in the resubmitted Planning Justification Addendum letter. In addition, the applicant should submit a plan and cross-section demonstrating that sufficient space will remain beyond the deck for drainage, landscaping, access easement (if any), fencing and potential sheds.	Please refer to the revised Planning Justification Addendum Letter. Sheds will not be permitted in the backyards. 2 metres will provide sufficient space for an access easement, landscaping, drainage and fencing.
26.	3.2.3 Side Yards A minimum sideyard setback of 1.5 metres has been requested to permit the townhouse blocks to be located 3 metres apart. Staff note that for the townhouses the minimum 2.4 metre building separation specified within the Cluster Development regulations (section 3.C.10) applies, as the proposed townhouses are not freehold townhouses. Since all of the townhouse blocks are 3 metres apart, this amendment is not required.	Acknowledged. Please refer to the revised Planning Justification Report Amendment.
27.	Further, staff note that the stacked townhouse sideyard setback requirement of 1.8 metres, applicable only to the stacked townhouses appears to be satisfied in all instances except between Block 6 and the internal sidewalk to the south (see below image). Consider either shifting the stacked townhouse block or the internal sidewalk/parking area to accommodate the required 1.8 metre sideyard setback.	A 1.2m setback is proposed between Block 7 and the proposed internal walkway on the updated concept plan. The walkway provides an additional 1.8m setback from the stacked townhouse block and the parking area (Common element road). Based on the definition of Side Yard in the City's zoning by-law, the side yard setback shall be measured from the building to the common

		element road, which equates to 3.0 metres and exceeds the minimum 1.8m setback.
28.	3.2.4 Loading Space 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. Through the 2nd resubmission the applicant has advised that the most recent concept plan has excess parking and that one of the excess parking spaces can be redesigned at the site plan stage to accommodate the required loading space. Staff acknowledge that the exact location of the required loading space can be dealt with through detailed Site Plan design.	Acknowledged.
29.	3.2.5 Bicycle Parking The stacked townhouse blocks require bicycle parking as per the section 6.6 of the Zoning By-law. Through the 2nd resubmission the applicant has advised that the required bicycle parking (0.3 Type A per dwelling unit and 0.3 Type B per dwelling unit) will be accommodated on the site at the site plan stage. Staff acknowledge that the exact location bicycle parking can be worked out through detailed Site Plan design.	Acknowledged.
30.	Staff do caution the applicant that bicycle parking cannot be included within the landscape open space calculations and based on the By-law requirements there are 51 Type A bicycle parking space and 51 Type B bicycle parking required for the proposed development, which could take up a considerable amount of space.	Acknowledged. The concept plan proposes 38% landscape Open Space which exceeds the zoning by-law requirement. The location for bicycle parking will be addressed at the site plan stage.
31.	3.2.6 Split Zoning Regulations	Acknowledged. Please refer to the updated Data Chart.

	In accordance with the Split Zoning regulations (3.S.5.1) within the By-law all requirements of the R8 zone have to be met within the R8 zone limit. According to the regulations the R8 zone boundary shall be deemed to be a lot line for determining compliance with the regulations of this by-law. In the next resubmission please update all applicable regulations within the Data Chart (eg. density calculations, landscape open space calculations, setbacks, etc.)	
32.	3.2.7 Required Data Chart Updates • For density calculation please use only the land area within the R8 zone to calculate density. The OS1 lands should not be included in the density calculations. • For clarity and ease of reference, include "total parking spaces required" and "total parking spaces proposed" • Separate side yard setback requirement for stacked townhouses and townhouses • The proposed Interior Lot Line setback for townhouses should be 3.2 metres. • Please separate the townhouse requirements from the stacked townhouse requirements, the By-law makes a distinction between the two. • It is unclear why there is a proposed and provided column in the data chart. The proposed and provided should be one and the same. In resubmission, please combined under "proposed".	Acknowledged. Please refer to the updated Data Chart.
	4.0 Site Design Considerations	
	4.1 Amenity Areas/POPS	
33.	Please refer to the comments received from Parks, Forestry & Cemetery Services staff for details. Planning staff are able to provide the following additional commentary related to the proposed Amenity Area/POPS: a) The revised Master Plan identifies two (2) amenity areas, however it is unclear whether the amenity areas are intended to be Privately Owned Public Spaces (POPS). Please clarify in resubmission.	Acknowledged. Please refer to the updated concept plan. A single larger park space is now proposed and can be conveyed to the City as parkland dedication.

	b) The stormwater management pond encroaches into the park space along the southern property line rendering a portion of the amenity area/POPS unusable and reducing the usable space from 900 sq. m. to approximately 600 sq. m. c) c) The L shaped amenity area in the north end of the proposed development has a 4 metre wide maintenance access running through it and it cannot be considered as usable open space for amenity area/POPS purposes.	
34.	For clarity, the intent of the Erbsville South Block Plan is that the proposed development incorporate a park space/open space that would meet the needs of the proposed development and the needs of existing developments in the surrounding area. 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 may consider privately owned public spaces (POPS) to meet the park space needs of the development. In the resubmission, redesign the proposed development to incorporate a park space or POPS area that is larger in size (closer to 1,500 sq. m.) and one that is not encumbered by maintenance access easements and the adjacent SWM pond.	Acknowledged Please refer to the concept plan. The revised parkland area is larger and can be conveyed to the City.
35.	From a planning perspective staff request that the applicant take into consideration the following when designing and 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) If possible, it is preferred that the park space is located adjacent to the stormwater 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 smaller in size.	Acknowledged, the project team has had discussions with the City to reach the park concept as proposed. Please refer to the concept plan. The revised parkland area is larger and can be conveyed to the City. We will coordinate with the City as required on the final park design.

	d) If a Park or POPS is proposed along Erbsville Road ensure that there is a sufficient buffer incorporated to protect children using the park space from the hazards of Erbsville Road. e) If POPS is located deeper into the site then there should be a clear and wide visual connection between Erbsville Road and the POPS to ensure that the POPS remains publicly accessible and welcoming and not be viewed as private space.	
	4.2 Trail Connection	
36.	Staff acknowledge the incorporation of a trail connection wrapping around the outside of the proposed development as shown within Schedule 'A6d' (Erbsville South: Mobility Network) of the Official Plan. As previously stated it is the City's preference that the proposed trail connection be conveyed to the City as part of the Conservation (OS3) zoned lands.	The trail is proposed to form part of the condo. Where the trail crosses the proposed parkland, it can be conveyed to the City with the Park if required.
37.	Staff note, that the proposed trail connection has not been fully considered by the updated EIS (see environmental planning comments) nor has it been incorporated into the engineering plans (see engineering comments). In your resubmission, please ensure that the proposed trail connection is fully considered and incorporated into all studies and plans. Staff need to understand whether the proposed trail connection if feasible.	A functional trail and grading design has been completed – see Eng Dwg FE-1.
	4.3 Sidewalk along Erbsville Road	
38.	It is important that the Mobility Principles outlined in policies 11.1.3 (3) (c) (i)-(vi) of the Erbsville South Block Plan are addressed appropriately by the proposed development. Staff acknowledge the incorporating of a sidewalks on both sides of the internal roadway where possible.	Acknowledged.
39.	With respect to the sidewalk along Erbsville Road, staff are of the understanding that the Region may be resurfacing this section of Erbsville Road in 2028, there has been no confirmation received from the Region to date about when this	Please refer to the revised concept plan. Land is proposed to be conveyed to the Region for a 2.1 metre road widening. The Comments received from the Region of Waterloo on July 22, 2024 identify that Erbsville Road is

	section of Erbsville Road will be urbanized with a sidewalk. Staff are of the understanding that generally road resurfacing does not include urbanizing the road with a sidewalk. Therefore, at this time it is unclear when the Region will be upgrading Erbsville Road to an urban cross section with sidewalks. Staff request that the applicant revise the proposed development by incorporating a sidewalk along Erbsville Road, incorporating appropriate pedestrian connectivity to the proposed trail connection. The recently submitted concept plan shows the proposed trail dead ending at Erbsville Road.	planned for reconstruction and major rehabilitation in 2028. Through review of the Region's Corridor Design Guidelines, it is noted that Erbsville Road is a Neighbourhood Connector – Avenue. This road type is to be designed to support active transportation including walking and cycling. A sidewalk connection has been proposed from the subject lands to the future active transportation facilities. A new sidewalk is not proposed on the Erbsville Road frontage through this development since a sidewalk on private lands would duplicate the active transportation infrastructure planned for Erbsville Road. The final location of the sidewalk will be determined through the future site plan application process.
40.	The sidewalk along Erbsville Road would provide a temporary solution to ensure appropriate pedestrian connectivity is achieve until the Region updates this section of Erbsville Road to an urban cross section. The sidewalk connection along Erbsville Road would be installed at the applicant's expense and secured through the Site Plan process.	A sidewalk connection has been proposed from the subject lands to the future active transportation facilities on Erbsville Road which should be constructed as part of the Erbsville Road reconstruction in 2028. A new sidewalk is not proposed on the Erbsville Road frontage through this development since a sidewalk on private lands would duplicate the active transportation infrastructure planned for Erbsville Road. The final location of the sidewalk will be determined through the future site plan application process. If the Region provides confirmation that active transportation facilities are not being constructed as part of the 2028 Erbsville Road reconstruction, a private sidewalk can be provided along the Erbsville Road Frontage though the site plan application.
	4.4 Coordination of Studies and Plan	
41.	All plans and studies should be coordinated. Staff have noticed the following discrepancies between the submitted plans, for instance:	All reports and drawings have been coordinated. The EIS mapping includes current designs from MHBC and JPE.

	a) Near Block 11 there is a discrepancy between the Development Limit shown on the Master Plan and the Limit of Residential Zone shown within the EIS b) The Residential Zone Limit (appears to be based on the limit of grading) shown on the Concept Plan (Appendix A) is quite different from the Limit of the Residential Zone identified within the EIS. Additionally, it is difficult the see the Residential Zone boundary on the Engineering Plans, with the Limit of Grading shown in a heavier line weight and the Residential Zone Limit in very light gray that almost disappears into the background. In your resubmission please ensure that all submission materials are consistent and coordinated.	
	4.5 Coordination of Development	
42.	Staff appreciate the coordination of development between 720 Erbsville Road and 672 Erbsville Road in the resubmission. 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. As the proposed development is revised to address additional comments contained in this letter staff continue to request a coordination of development between 720 Erbsville Road and 672 Erbsville Road in future resubmissions.	Please refer to the revised concept plan. The stormwater management pond is located adjacent to the 672 Erbsville Road property to allow the two sites to utilize a coordinated stormwater management approach. 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.
43.	Given that 720 Erbsville Road and 672 Erbsville Road are to be developed in a consolidated manner with shared access and a shared SWM strategy, it is anticipated that a number of cross easements will be required at the detailed design stage to ensure that each development can function properly. In your resubmission please detail the cross easements anticipated between 720 Erbsville Road and 672 Erbsville Road and their	Acknowledged. Easements will be determined through the future condominium and site plan processes. The stormwater management pond location will allow for the pond to be expanded onto the 672 Erbsville Road lands once they are developed. A road connection has been proposed from the internal road at the south end of the plan area.

	location to ensure that both developments are designed in a consolidated manner.	
	4.6 Stormwater Management Ponds and the Future Condominium	
44.	The revised development concept shows two (2) stormwater management ponds that appear to be in private ownership. From a condominium perspective planning staff have some concerns that the maintenance of two stormwater management ponds will be a significant burden on 169 condominium unit owners.	Please refer to the revised concept plan. Only one swm pond is proposed.
	4.7 Road Widening	
45.	The Region of Waterloo identified that this section of 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). As stated in the April 2023 post-circulation comment letter, please 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.	A draft reference plan will be submitted for the future site plan and condominium applications.
	4.8 Other Site Design Considerations/Master Plan Comments	
46.	Should there be a need for retaining walls as a result of a change in the site grading, please ensure that 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.	At this functional stage of design retaining walls are not anticipated to be required.
47.	The applicant 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.	Acknowledged
	5.0 Environmental Planning – Robyn McMullan	

48.	The comment-response matrix notes that the Applicant intends on maintaining ownership of the natural heritage features and buffers. City staff strongly encourage the lands to be conveyed to the City for protection through municipal ownership to avoid the need for other planning tools to be applied. Please advise.	The City's Official Plan does not require the conveyance of environmental lands, and the lands do not form part of the proposed development applications. The owner does not intend to convey the environmental lands to public ownership.
49.	The comment-response matrix notes that 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" and that "a more fulsome impact analysis will be provided through detailed design, once trail grading requirements and exact layout have been determined". The recommendations for the trail included in the revised EIS (Section 6.4.4) are minimal. Further, the buffer encroachment analysis provided in Section 6.3.1 only addresses the grading associated with the stormwater management facilities and the infiltration swale, not the trail, which could have implications on grading given the need to meet accessibility standards. Also, the recommendation to locate the trail within the outer 5 metres of the buffer, per the Erbsville South Environmental Study, cannot be implemented in the areas where the infiltration swale is proposed within the buffer. Additionally, it is noted in Section 3.2 of the Functional Servicing Report that the proposed development will remain outside of the Regulatory Floodplain with no grading proposed within the floodplain. This statement seems premature since the functional grading has not accounted for the trail, and the floodplain appears to be within as little as ~4 metres of the 'Limit of Grading' that is shown on the Functional Grading Plan.	A functional design of the trail has been completed and included with this submission. Only very minor encroachment into the fringe of the floodplain is shown to be required to blend in the Trail's grading. The EIS mapping has been updated to show both the 3m wide trail corridor and the swale footprint. The trail is proposed to be located north/northeast of the swales. The impact assessment has been updated to include discussion of the trail footprint in the vicinity of natural features and the associated buffer reductions anticipated. Negative impacts associated with the trail are not anticipated provided that the mitigation measures are incorporated into detailed design.

50.	As set out in Official Plan policies 8.2.4(9) and 8.2.5(9), buffers are to remain in a primarily natural state or be restored to a primarily naturalized state if disturbed through historical land use or approved works. Portions of the infiltration swale are proposed to be within the buffer and under Section 6.3.1 of the EIS, it is recommended that the infiltration swale be naturalized with appropriate native species. Will the vegetation within and around the infiltration swale need to be maintained/manicured in order for the swale to function properly? Please advise.	The detailed design of the Infiltration swale will be completed at the detailed design stage. However, we envision the infiltration swale to be either a "Rain Garden" type feature (see: https://trca.ca/news/complete-guide-building-maintaining-rain-garden/), or alternatively it could be a combination of a french drain and storage swale. Suffice it to say, space for the infiltration has been demonstrated.
51.	The Functional Servicing Report notes that stormwater quality treatment will be achieved utilizing Oil Grit Separators located at the outlet of each SWM pond. Engineering Services staff need to confirm the acceptability of this approach and whether it is consistent with the direction of the Erbsville South Environmental Study, which specifies "stormwater management facilities are required to provide an enhanced level of water quality control for all flows not infiltrated across the site utilizing Low Impact Development (LID)". Staff note that the Stormwater Management Report states "it is recommended to have two Stormceptor EFO4 OGS units in parallel for the inlet of each pond" but the Functional Servicing Plan appears to show the units at the outlets.	As described in the SWM report, the proposed OGS units will achieve an Enhanced Level of Water Quality Control. The location of the OGS units has been coordinated.
52.	Section 8.2 and 8.3 of the Stormwater Management Report briefly outline the during- and post-construction monitoring programs. As outlined, these programs do not appear to address all the requirements of the City's Development Monitoring Protocol (attached). The 2023 Monitoring Report submitted by Stantec on March 20, 2024 does, however, more accurately reflect the during- and post-construction requirements by stating the following on page 2.1: "The Stage II (during-construction) and Stage III (post-construction) Monitoring Programs will contain the same elements as the Stage I Monitoring Program with the addition of surface water quality monitoring stations at the inlet and outlet of the proposed stormwater management (SWM) facility." As part of	Please refer to the updated monitoring plan for during construction and post construction. A Terms of Reference for the during-construction monitoring program will be provided following detailed design.

	the Site Plan process, a Terms of Reference for the during-construction phase will need to be prepared that specifies monitoring activities and locations for all components of the during-construction monitoring program.	
53.	On page 21 of NRSI's 2023 Pre-Construction Biological Monitoring Report, which is included as Appendix V in the Revised EIS, it is stated that "If subsequent years of monitoring are required, it is recommended that they follow this same methodology with a minimum of one year of pre-construction monitoring, consistent with the City of Waterloo requirements for their Development Monitoring Program (1999, 2020) and the ESES (Dougan et al. 2018), required immediately preceding construction." For reference and transparency, through the 2023 Monitoring Report that Stantec submitted in March 2024, Stantec recommended that the frequency of its pre-construction monitoring program could be reduced to every other year given the length of time the program has been carried out. In response, staff confirmed that provided monitoring occurs during the year immediately preceding construction (i.e. grading), the frequency of the pre-construction monitoring could be reduced to every other year but that as soon as construction (i.e. grading) begins and the monitoring program transitions to the during-construction phase, monitoring will need to revert back and be undertaken on yearly basis. The response provided to Stantec aligns with NRSI's above-referenced approach. Monitoring efforts between NRSI and Stantec should be coordinated, and as noted in the comment above, as part the Site Plan process, a Terms of Reference for the during-construction phase will need to be prepared that specifies monitoring activities and locations for all components of the during-construction monitoring program.	Noted. As timing of construction is hard to predict, monitoring may still need to occur annually.
	6.0 Development Engineering – Mike Defoa	

	6.1 Stormwater Management Report	
54.	Proposed stormwater management strategy is inconsistent between the FSR and Stormwater Management Report, revise and clarify.	Please refer to the updated FSR and SWM Report which have been coordinated.
55.	Proposed servicing drawing provides a single OGS unit at the outlet of each pond. **i.** Due to conflict between SWM report and stormwater servicing design, the overall design of the proposed stormwater management ponds should be reviewed by applicants consulting engineer.	Please refer to the updated FSR and SWM Report which have been coordinated.
56.	SWM report describes the use of infiltration galleries. Infiltration galleries are not detailed on the servicing design drawing.	Please refer to the updated FSR for new detail. At final design additional detail will be added.
57.	Additional detail and grading required within proposed infiltration swales. i. Portion of proposed infiltration swales are within designated wetland setback boundary.	Please refer to the updated FSR. Additional grading detail has been added. At final design additional detail will be added. Please refer to the revised EIS which discusses encroachments.
58.	City of Waterloo does not support two stormwater management ponds. i. Please revisit/redesign the proposed stormwater management pond at the southeast property corner, boarding 672 Erbsville Court to accommodate stormwater quantity and quality control for the 720 & 672 Erbsville Road properties. 1. SWM pond should be designed such that the 672 Erbsville Road property can connect their storm sewer drainage. 2. SWM pond should have access for City of Waterloo maintenance staff/vehicles directly from	Please refer to the revised concept plan and engineering plans. One Pond is now proposed. Allowance is made for expansion of the pond to service 672 Erbsville and noted on the drawings. A maintenance access has been provided from Erbsville Road to the Pond. Additional details will be provided at Final Design.

	Erbsville Road. This access can also be utilized as part of a pedestrian trail.	
	6.2 Functional Servicing Report	
59.	Will development be phased? If phased, how is servicing proposed without conflicting with Ontario Building Code.	At time of Final Design staging will be reviewed to ensure it is OBC compliant. The development is planned to be constructed in one Phase.
60.	Sanitary flow modelling. Applicant can submit a request to model proposed sanitary flows contribution to existing municipal system.	The Erbsville sewer (historically financed by the Developer to service Regal Place and future lands) was designed to accommodate the subject site.
61.	Proposed service connections within the municipal right of way to be completed as per Region of Waterloo DGSSMS and City of Waterloo specifications.	Agreed. Additional details to be provided at Final Design.
	6.3 Functional Grading Plan	
62.	Requested sidewalk along Erbsville Road has not been detailed on proposed grading drawing.	Additional details to be provided at Final Design. Suffice it to say the grading has been proposed to accommodate the ultimate 4 lane ROW of Erbsville Road per Region requirements (i.e., Property line elevation set accordingly).
63.	Include grading of proposed trail that wraps around the north, east and south sides of the development, connecting to new sidewalk along Erbville Road.	Please refer to the updated FSR and grading plan.
	7.0 Landscape review – Emily Brown	
64.	General landscape architectural comments for the application are outlined below. Please note that all current Site Plan, Subdivision and Capital Project applications and development processes have been compiled into the recently implemented City of Waterloo Comprehensive Engineering and Landscape Manual (CELM). Please visit the CELM for all standard guidance, standards and requirements. All forthcoming development applications shall meet the requirements/follow the processes set out in the CELM.	Acknowledged.

65.	Vegetation Management: Mature and healthy trees shall be considered as high preservation priorities and must be considered early in the design process so preservation and construction mitigation measures can be successfully employed. Most existing trees on the site appear to be in good condition and the design of the proposed development should prioritize the preservation of mature trees over removal and replacement wherever possible. A Vegetation Management Plan must be undertaken and approved prior to the removal of any vegetation on site. Recommendations from the EIS must be followed.	Noted. Additional text has been added in the EIS addendum to Section 2.3.3 to highlight the need to maximize tree retention.
66.	Any tree clearing shall be in accordance with the federal Migratory Birds Convention Act, 1994, and the provincial Endangered Species Act, 2007. Clearing activities shall be completed in accordance with all recommended bird nesting windows, the protection of Species at Risk habitat, and the completed EIS.	Noted. Additional mitigation measures have been identified in the EIS addendum regarding any vegetation impacts for the outlet design. Ground disturbance should not occur within Category 2 Blanding's turtle habitats during the overwintering period; only surface cuts to trees shall be completed, if required. At this time, tree removals have not been identified in these areas; however, this will be confirmed at detailed design.
67.	There are conflicts between the development limit, limit of grading, and residential zone limit.	Please refer to the revised concept plan. The limit of grading allows for the construction of the proposed trail. The limit of the residential zone is different from the limit of grading.
68.	The proposed locations of the infiltration swales and spreader swales are shown within the limits of the required buffer. a) Provide additional information about the infiltration swales. The EIS states that infiltration swales should be naturalized with appropriate native species. Confirm that the infiltration swales being vegetated and naturalized with native grasses, shrubs and trees will not interfere with the stormwater function of the swales and can in	The infiltration swales will likely be landscaped as a "rain garden" with appropriate vegetation, etc. Refer to: https://trca.ca/news/complete-guide-building-maintaining-rain-garden/. Alternatively, an infiltration trench could be used. a)The exact design of the swale will be determined at detailed design. At this stage, it is assumed that some naturalization can occur within the areas where swales are located.

	fact add to the naturalization of the environmental buffer. b) Further to the above, the Preliminary Landscape Plan shows trees in the rear yards over the "infiltration swales". Can trees be planted here? c) Please provide information about the required maintenance for the infiltration swales and spreader swales. Please see further comment from Development Engineering. d) Show the limits of any required easements, such as access or maintenance easements. e) As noted in the EIS, an ecological restoration plan shall be provided during detailed design. At this stage, city staff need to confirm that there are no negative impacts (i.e., to the function of buffer or relating to maintenance) of having the swales within the buffer and not strictly within the residential zone.	b) The final location of tree planting will be determined through detailed design. The submitted landscape plan is conceptual. c) Maintenance requirements will be determined at detailed design. An updated impact assessment may be required to determine if additional mitigation measures may be required for associated maintenance. Permanent wildlife exclusion fencing should ensure that no wildlife will be impacted by activities on that side of the fence. The proposed trail around the eastern side of the development will provide access to the Infiltration Swale for maintenance. e) Impacts associated with the swales are not anticipated. A considerable amount of buffer enhancement (0.47ha) will be provided in the combination of the wetland/ watercourse/ dripline buffer, which will improve existing condition and mitigate impacts of the adjacent development. See Sections 2.2 and 2.3.1 of the EIS addendum.
69.	Section 5.0 of the Urban Design Guidelines say that the proposed development will allow for future trail connections. It also states that the site has been designed to facilitate connections to a conceptual trail system through the buffers of the open space area to the north east of the development envelope. Please clarify these statements in the Urban Design Guidelines. Per city standard practice, the trail network is to be constructed at the time of development, not into the future.	Please refer to the revised urban design guidelines. The trail is proposed to be established through the draft plan of condominium and site plan applications.
70.	Include further information on the proposed trails including the 3.0m wide asphalt trail, associated shoulder/mowstrip, and grading. Refer to detail CW-501 found in the CELM for further information. According to the EIS, trails are permitted in the outer 5.0m of the buffer. The accurate limit of grading shall be	Please refer to the revised grading plan for additional grading details. A trail envelope has been provided by JPE and incorporated into the EIS mapping. See Sections 2.3.1,

	determined to confirm and ensure that further grading into the environmental buffers will not occur.	2.3.4, and 2.4.4 of the EIS Addendum for discussion of potential trail impacts. Negative impacts are not anticipated provided that the recommended mitigation measures are included. The final design of the trail and the associated shoulder/mowstrips will be finalized through detail design. A native seed mix can be used on the side of the trail adjacent to the naturalized area and sod can be used adjacent to rear yards and park space. The naturalized shoulder with native seed mix would not present any additional encroachment into the natural heritage setbacks, as such a 4 metre trail allowance is sufficient to provide a 3 metre wide trail with 1 metre wide sod mow strip on one side.
71.	Include the proposed trail alignment on the Proposed Enhancements figure in the EIS. Ensure calculations accurately reflect the buffer enhancement area and buffer encroachment area. Show the limit of grading accurately for the proposed trail.	The mapping has been updated to include the trail.
72.	Include trails within the Direct Impacts and Mitigation Measures section of the EIS. Currently only site grading, tree and vegetation removal, impacts to wildlife, and corridors and linkages are discussed.	See Sections 2.3.1, 2.3.4, and 2.4.4 of the EIS Addendum for discussion of potential trail impacts. Trail construction is only considered a potential direct impact for Category 2 and 3 Blanding's Habitat. A net ecological gain will be achieved through buffer enhancements that will increase natural areas within the study area and provide improved wildlife movement corridors. No other natural features or habitats are identified within the trail footprint.
73.	Please note that a comprehensive fencing plan will be required including fencing on the open space side of the trail incorporating any requirements of the EIS such as turtle exclusion fencing. This can be provided as part of the Site Plan submission.	Noted. This will be determined at the detailed design stage and should be determined in coordination with MECP.

74.	The City's standard practice is that environmental lands, including the required environmental buffers and the trail, be zoned OS3 and conveyed to the City during the Site Plan process.	The environmental lands are proposed to be zoned OS3, but the lands will remain in private ownership.
75.	In order to determine if a reduced rear yard setback is appropriate for this development and location, please provide the following… a. Grading implications of the trail. The trail shall meet City standard outlined in the CELM and AODA requirements. b. Demonstrate there is adequate space within the rear yards for grading, drainage, tree planting, access easement(s), and any fencing. Provide a plan and cross sections in multiple locations to demonstrate there will be adequate space with the proposed reductions. Please show the location and grading meeting the trail as well.	The design of the trail will be finalized through detailed design, but the trail will be designed in accordance with City standards. Please refer to the example rear yard cross-section provided.
76.	Refer to comments provided by Parks staff regarding parkland.	Acknowledged.
77.	Active Amenity Area a) We acknowledge that refinements to the amenity space plans are expected during the Site Plan process. However, there are some important conflicts and concerns to be addressed now as they relate to the size of the amenity area. i. Confirm the SWM ponds are sized accurately. Specifically, there are discrepancies between the active amenity area boundary and the pond limits shown in the engineering plans. Ensure all submission materials are coordinated ii. The basketball court is very close to the street and a buffer between the two uses is encouraged. Staff are concerned that the size of the active amenity area is not large enough to accommodate all features that are shown (i.e., half basketball	Acknowledged. Please refer to the revised Concept Plan. The design of the park lands will be finalized through detailed design.

	court and play equipment with appropriate street buffers). b) Through site plan or further refinement of the active amenity area, the applicant is encouraged to consider the following: i. It appears there is adult outdoor fitness equipment as well, which may be encouraged depending on the expected needs of the residents, ii. Additional seating (like picnic tables that could accommodate eating outdoors or games), and iii. Provision of shade, especially given the amount of asphalt south and west of the active amenity area.	
78.	Passive Amenity Area a) Maintenance access for SWMFs is not shown on the master plan or preliminary landscape plan. The 4.0m wide maintenance access is significant and makes this area not really an amenity area. Further to this, it appears this is a major overland flow route, which is not encouraged for amenity area design.	Please refer to the revised Concept Plan.
79.	Landscaped Open Space (LOS): The Site Statistics chart on the submitted Master Plan shows the proposed Landscaped Open Space (LOS) at 47.8% where 30% is required. There seems to be plenty of flexibility within the LOS, however we want to point out that certain items, such as bike parking, do not count toward LOS and are not currently shown on the plans.	Acknowledged. The landscape open space area has been revised on the updated concept plan. The final landscape open space area and bike parking locations will be determined at the site plan stage.
80.	Per the provided Urban Design Guidelines, the preliminary landscape plan has been designed to provide extensive plantings throughout the site to reduce the urban heat island effect and create a pleasant public realm. Further to this, please prioritize large canopy tree planting to provide shade	Acknowledged. Plating details will be determine during the site plan process.

	over the roads, parking areas, amenity spaces, and other impervious surfaces.	
81.	General: Because sidewalks, the stormwater management pond and amenity area, and the trail connections are proposed directly adjacent to parking areas and roads, it will be important to consider snow storage locations early in the design process.	Acknowledged. Snow storage areas will be determined at the site plan stage.
82.	Site surface parking is described in Section 5.0 of the Urban Design Guidelines as small parking areas divided by landscape areas and residential buildings. a) Landscaping may be possible on the periphery of the surface parking areas outside of the 1.8m wide curb-face sidewalks, but we do not agree that this is incorporated into the parking. Please review opportunities to provide landscaping including tree planting to break up the large surface parking areas. b) Natural shade is vital for reducing urban heat island effect with a focus on reducing the asphalt surface temperature between May and September	Acknowledged. Additional landscape bump-outs have been added to the parking area on the revised concept plan. Final design for the parking areas will be determined through the future site plan application.
	8.0 Parks, Forestry and Cemetery Services – Anna lee Sangster	
83.	The amount of available parkland in this area is limited and therefore we anticipate the site amenities will serve nearby neighbourhood in conjunction with the future residents of this site. The revised site master plan identifies two amenity areas, including an active area that is 900 sq. m. and a passive area that is 672 sq.m. It is our understanding that both of these amenity areas will be privately owned public spaces (POPS) that will be accessible to the public via the internal site sidewalk / trail network or private road.	Please refer to the revised concept plan. The revised park area is proposed to the publicly owned.
84.	As indicated through previous correspondence, the City's preference is that a park be conveyed to the City as per the City's Parkland dedication by-law. Parks, Forestry & Cemetery	Please refer to the revised concept plan. The revised park area is adjacent to Erbsville Road and is proposed to be dedicated to the City of Waterloo.

	Services requests consideration to the following general recommendations to the amenity areas presented: - Consolidation of two amenity areas into one larger amenity area (total minimum area 1,570 sq.m.) - Relocation of the amenity area adjacent to the regional right-of-way - Dedication of parkland to the City of Waterloo	
85.	Please maintain pedestrian connections between the site amenity area through the site, connecting to both the proposed trail and to the adjacent, future development located at 672 Erbsville Road. Should the applicant opt to maintain ownership over the amenity area, the amenity area is encouraged to be relocated to be adjacent to the regional right-of-way. Any proposed POPS must be of exceptional quality and must meet the City's guidelines for POPS including for public access. Any proposed Park space, POPS or amenity area shall be located to the satisfaction of the Director of Planning.	Please refer to the revised concept plan. The proposed park is well connected to the proposed trail system and future sidewalk on Erbsville Road.
86.	A sidewalk connection will be required to be provided for the length of the property fronting onto Erbsville Road through this development. In resubmission updated plans to show the sidewalk connection.	Please refer to the revised concept plan. A 2.1 metre road widening is being dedicated to the Region of Waterloo. Erbsville Road is planned for reconstruction and major rehabilitation in 2028. Through review of the Region's Corridor Design Guidelines, it is noted that Erbsville Road is a Neighbourhood Connector – Avenue. This road type is to be designed to support active transportation including walking and cycling. A sidewalk connection has been proposed from the subject lands to the future active transportation facilities. A new sidewalk is not proposed on the Erbsville Road frontage through this development since a sidewalk on private lands would duplicate the active transportation infrastructure planned for Erbsville Road. The final location of the sidewalk will be determined through the future site plan application process.
87.	The Functional Servicing Plan identifies a 4.0m wide maintenance access through the proposed passive amenity	Acknowledged. Please refer to the revised concept plan.

	area to storm water management pond 'A'. Include this information on the master plan and the preliminary landscape plan. The 4.0m wide maintenance access is not considered an amenity use and should be excluded from the calculation towards total site amenity area.	
	9.0 Transportation Services – Ainsley Rego	
88.	Transportation Services request a sidewalk along the frontage of the site.	Please refer to the revised concept plan. A 2.1 metre road widening is being dedicated to the Region of Waterloo. Erbsville Road is planned for reconstruction and major rehabilitation in 2028. Through review of the Region's Corridor Design Guidelines, it is noted that Erbsville Road is a Neighbourhood Connector – Avenue. This road type is to be designed to support active transportation including walking and cycling. A sidewalk connection has been proposed from the subject lands to the future active transportation facilities. A new sidewalk is not proposed on the Erbsville Road frontage through this development since a sidewalk on private lands would duplicate the active transportation infrastructure planned for Erbsville Road. The final location of the sidewalk will be determined through the future site plan application process.
	GRCA Comments	
89.	GRCA recommends that a decision on the applications is deferred to allow the applicant to adjust the stormwater management strategy for the site.	Acknowledged.
90.	The proposed stormwater management (SWM) strategy does not adequately reduce the runoff volume to the wetland. Post-development runoff volume to the wetland is 121% more than pre-development condition. Please revise the SWM strategy and/or EIS accordingly to mitigate wetland impacts.	Please refer to the revised stormwater management report. Post-development runoff is addressed in the new design and runoff from the pond is directed directly to the Creek via pipe. The EIS addendum provides an updated impact assessment based on the revised SWM report.
91.	A feature-based water balance was requested. It appears that changes have mainly been expressed as changes to the site's	Please refer to the updated Stormwater Management Report which has demonstrated that there is no impact

	water balance, with discussion of the scale of the proposed changes as a percentage of the Laurel Creek system. An indication of the change in relation to the adjacent wetland and Laurel Creek's water balance is requested.	to the adjacent wetland. GRCA met with NRSI, JPE and Water's Edge to confirm priorities. The EIS addendum provides an updated impact assessment based on the revised SWM report. It discusses both Laurel Creek and the PSW.
92.	Please provide the following in a re-submission: a) Confirm vertical datum to all drawings with topography and floodlines. b) The storage characteristics of SWM ponds provided in Table 7 of the SWM report are different from the values provided on Drawing FE2 in the functional servicing report (FSR). Please revise with the correct values. c) The infiltration swale sizing presented on Page 6/18 of the SWM report does not match with the section view of the swale on drawing FE-1 of the FSR. d) There is a typo in Table 11 of SWM report. The exceedance from target should be equal to C-B.	Please refer to the revised stormwater management report, functional servicing report and engineering plans.
	Enova Comments	
93.	**Conditions of Services:** Enova standard conditions in effect at the time of servicing will apply.	Acknowledged.
94.	**Existing System:** Enova has 3-phase primary overhead distribution lines on the south-west side of Erbsville Rd. Enova intends to maintain the overhead distribution system on all abutting streets.	Acknowledged.
95.	**Relocation of Existing Facilities:** Any relocation of existing Enova facilities, if possible, will be at 100% of the applicant's cost.	Acknowledged.
96.	**Expansion and Upgrade:** If modifications or additions to Enova existing distribution system triggered by a subdivision development are necessary otherwise customer connections cannot be made, Enova will conduct an economic evaluation outlined in OEB Distribution System Code. Such expansion cost will be stated in a Subdivision Agreement between WNH and	Acknowledged.

	the Customer and shall be signed by both parties prior to construction.	
97.	**Set Back:** The proposed building(s) must be set back a minimum of 5.0m from all overhead primary conductors. Decreased setbacks (if proposed) may necessitate the installation of non-combustible barrier walls between Enova padmount transformers and the housing unit as per the Ontario Electrical Safety Code, Section 26-014. This installation would be at 100% the developer's cost and may require a revised right of way cross section to facilitate the installation due to the proximity of the padmount transformer to the sidewalk.	Acknowledged.
98.	**Clearance:** Any objects (crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment) shall not be brought closer than 3 meters to an energized overhead conductor owned by Enova.	Acknowledged.
99.	**Access to Meters:** Enova requires a minimum 1.2 m (4') wide clear access in front of and around a meter location that is within 3 m (10') of the front corner of the building and is on the side of the lot where the service stub is located. If less than 1.2m (4') is provided, a registered easement on the adjacent lot must be granted at no cost to WNH. If this access/easement cannot be provided, the meter must be placed on the front face of the house. For on-street townhouse blocks, ganged meter bases must be placed on the end units in accordance with Enova's final design.	Acknowledged.
100.	**Easement:** In a townhouse blocks subdivision if there is no public right-of-way, a blanket easement over all townhouse blocks is required by Enova in order to construct and maintain hydro owned facilities. Whereas there is public right-of-way in a townhouse block subdivision, individual easement to ganged meter base is required. Easement shall be at no cost to Enova and be free of encumbrances, including fences and shall be granted to Enova prior to connection.	Acknowledged.
101.	**Road Widening:** The Regional Municipality of Waterloo should review the pole locations in relation to any planned road	Acknowledged.

	widening. A larger building set back may be required to facilitate the relocation of Enova's poles.	
102.	**Grading:** Any grading changes by the developer which will affect existing Enova facilities shall be reviewed and approved by Enova prior to starting any site grading.	Acknowledged.
103.	**Landscaping:** The customer is to ensure any landscaping that will be within the vicinity of Enova infrastructure complies with the ESA Planting Under or Around Powerlines & Electrical Equipment guideline.	Acknowledged.
104.	**What Happens Next**: Enova may conduct a high level hydro plan once receiving the 1st submission package. Enova will only stat the detail engineering design upon the reception of the 2nd submission package. Typical 13 weeks is required from the date of Enova receiving the 2nd submission package to the date of Enova issuing the subdivision agreement to Customer. Customer shall install road crossings as per Enova design and then install road base and curbs prior to start of hydro civil construction.	Acknowledged.
	Waterloo Catholic District School Board	
105.	The Waterloo Catholic District School Board has reviewed the subject application and based on our development circulation criteria have the following comment(s)/condition(s):	Acknowledged.
106.	a) That any Education Development Charges shall be collected prior to the issuance of a building permit(s).	Acknowledged.
107.	b) That the developer and the Waterloo Catholic District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the development sign advising prospective residents about schools in the area. A sign specifications document can be found at the bottom of the board's planning department web page (https://www.wcdsb.ca/about-us/cs/planning/).	Acknowledged.

108.	c) That the developer shall include the following wording in the condominium declaration to advise all purchasers of residential units and/or renters of same: "In order to limit risks, public school buses contracted by Student Transportation Services of Waterloo Region (STSWR), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up and drop off students, and so bussed students will be required to meet the bus at a congregated bus pick-up point." If you require any further information, please contact me by e-mail at Jordan.Neale@wcdsb.ca.	Acknowledged.
	Canada Post Comments	
109.	The owner/developer will consult with Canada Post to determine suitable permanent locations for the placement of Community Mailboxes and to indicate these locations on appropriate servicing plans.	Acknowledged.
110.	The Builder/Owner/Developer will confirm to Canada Post that the final secured permanent locations for the Community Mailboxes will not be in conflict with any other utility; including hydro transformers, bell pedestals, cable pedestals, flush to grade communication vaults, landscaping enhancements (tree planting) and bus pads.	Acknowledged.
111.	The owner/developer will install concrete pads at each of the Community Mailbox locations as well as any required walkways across the boulevard and any required curb depressions for wheelchair access as per Canada Post's concrete pad specification drawings.	Acknowledged.
112.	The owner/developer will agree to prepare and maintain an area of compacted gravel to Canada Post's specifications to serve as a temporary Community Mailbox location. This location will be in a safe area away from construction activity in order that Community Mailboxes may be installed to service	Acknowledged.

	addresses that have occupied prior to the pouring of the permanent mailbox pads. This area will be required to be prepared a minimum of 30 days prior to the date of first occupancy.	
113.	The owner/developer will communicate to Canada Post the excavation date for the first foundation (or first phase) as well as the expected date of first occupancy.	Acknowledged.
114.	The owner/developer agrees, prior to offering any of the residential units for sale, to place a "Display Map" on the wall of the sales office in a place readily available to the public which indicates the location of all Canada Post Community Mailbox site locations, as approved by Canada Post and the Region of Waterloo.	Acknowledged.
115.	The owner/developer agrees to include in all offers of purchase and sale a statement, which advises the prospective new home purchaser that mail delivery will be from a designated Community Mailbox, and to include the exact locations (list of lot #s) of each of these Community Mailbox locations; and further, advise any affected homeowners of any established easements granted to Canada Post.	Acknowledged.
116.	The owner/developer will be responsible for officially notifying the purchasers of the exact Community Mailbox locations prior to the closing of any home sales with specific clauses in the Purchase offer, on which the homeowners do a sign off.	Acknowledged.
117.	The owner/developer of any condominiums will be required to provide signature for a License to Occupy Land agreement and provide winter snow clearance at the Community Mailbox locations.	Acknowledged.
118.	Enhanced Community Mailbox Sites with roof structures will require additional documentation as per Canada Post Policy.	Acknowledged.

119.	There will be no more than one mail delivery point to each unique address assigned by the Municipality.	Acknowledged.
120.	Any existing postal coding may not apply, the owner/developer should contact Canada Post to verify postal codes for the project.	Acknowledged.
	Water Services	
121.	Staff has reviewed the Functional Servicing Report dated November 2023 by JPE Engineering and have no comments.	Acknowledged.
	Hydrogeology & Water Programs (Source Water Protection)	
122.	Staff has reviewed the Stormwater Management Report (Water's Edge, December 2023) and have no comments.	Acknowledged
123.	As a condition of draft plan approval for the plan of condominium, the owner/developer is required to provide a Final Stormwater Management Report to the satisfaction of the Region of Waterloo.	Acknowledged
124.	In addition, HWP staff request that the owner/developer enter into a development agreement to complete a Salt Management Plan for each multiple residential block to the satisfaction of the Region of Waterloo prior to site plan approval.	Acknowledged
125.	Please note, the proponent should be made aware that the Region does not support permanent active or passive dewatering controls for below-grade infrastructure, including foundations, slabs, parking garages, footings, piles, elevator shafts, etc. Below-grade infrastructure requiring dry conditions should be waterproofed.	Acknowledged
	Corridor Planning	

126.	**Environmental Noise** Staff have previously reviewed and provided comments on the Noise Study report entitled 720 Erbsville Road, Waterloo, ON Noise Report, prepared by IBI Group, dated October 2021 (Docs # 4254258). A Noise Study addendum, 720 Erbsville Road, Waterloo, ON Environmental Noise Study Revised Site Plan prepared by JPE Engineering, dated November 8, 2023 acknowledges that the analysis and findings of the October 2021 Noise Report remain valid for the revised Site Plan and thus the report's recommendations remain unchanged for the revised Site Plan	Acknowledged
127.	**Condition of Approval for Future Site Plan Application** Approval of the road widening, Access Permit, Transportation Impact Study and Lot Grading and Stormwater Management would be required prior to final approval of the future Site Plan Application.	Acknowledged
128.	**Regional Road Dedication** At this location, Regional Road #70 (Erbsville Road) has a designated width in the Regional Official Plan (ROP) of 30.48 metres from Keats Way to Schnarr Street and 20.117 meters from Schnarr Street to Conservation Drive. As the existing property line varies, an approximate 3m road widening would be required along the frontage of Erbsville Road between Keats Way to Schnarr Street and 4.5m from Schnarr Street to Conservation Drive. An Ontario Land Surveyor (OLS) would have to determine the exact road widening. It is recommended that the OLS contact Region staff to discuss the road widening prior to preparing the Reference Plan. The land must be dedicated to the Region of Waterloo for road allowance purposes and must be dedicated without cost and free of encumbrance. All land dedications should be identified on the Site Plan.	Acknowledged. Please refer to the updated Concept Plan which identifies the proposed road width of Erbsville Road.

	The Owner/Applicant must engage an OLS to prepare a draft reference plan which illustrates the required road allowance widening. Prior to registering the reference plan, the OLS should submit a draft copy of the plan to the Transportation Planner for review. An electronic copy of the registered plan is to be emailed to the Transportation Planner. Further instructions will come from the Region's Legal Services staff with regard to document preparation and registration.	
129.	**Access Permit** A Regional Access Permit will be required for the proposed accesses to Erbsville Road. The proposed accesses must comply with the Regional Access Policy. The applicant will be responsible for all costs associated with the proposed access. The fee for the issuance of the permit is $230 each. The application for a Regional Road Access Permit can be found on the Region's website at https://www.regionofwaterloo.ca/en/doing-business/applications-licences-and-permits.aspx A Regional Access Permit (no fee) will be required for the closure of the existing access to Erbsville Road.	Acknowledged.
130.	**Transit Planning** Grand River Transit requires funds in lieu of the provision of one concrete pad and one 5'x12' shelter (approx. $16,000 total, 2023 pricing subject to change based on concrete pad size) for future services on Erbsville Road opposite Regal Place. Detailed specifications of concrete pad and costs can be provided at further stages in the project.	Acknowledged, to be addressed through future condominium and site plan application.
131.	**Stormwater Management & Site Grading** Regional staff have received Functional Servicing report that includes the updated Functional Grading Plan (Drawing FE-1) and Functional Servicing Plan (Drawing FE-2) prepared by JPE Engineering dated November 23, 2023. Staff also reviewed the report entitled Sunvest Development Corporation 720 Erbsville	Acknowledged

	Road, Waterloo, ON Stormwater Management Report, dated December 15, 2023, prepared by Water's Edge Environmental Solutions Team. Comments will be provided separately. The site must be graded in accordance with the approved plan and the Regional Road allowance must be restored to the satisfaction of the Regional Municipality of Waterloo. Please be advised that any new servicing connections or update to the existing servicing would require Regional approval through a separate process of Municipal Consent.	
132.	**Other** The Region' s 2024 Transportation Capital Program identifies this section of Erbsville Road (Regional Road #70) for reconstruction and major rehabilitation in 2028 with works from Columbia Street West to Waterloo/ Woolwich boundary. A Site Plan preconsultation fee of $300 and a Site Plan review fee of $805 will be required for the review and approval of a future Site Plan application.	Acknowledged
	Environmental Planning	
133.	The relevant Regional condition for this application was as follows: "Once feature limits and buffers are confirmed, then the Official Plan Amendment and Zoning By-law Amendment applications may be supported." Based on the submitted materials (EIS and Comment Matrix) this condition has been satisfied and Env. Planning has no further requirements with regard to the above noted OPA and ZBA.	Acknowledged.
	Archaeology	

134.	After further review, Regional Staff note the subject property of 720 Erbsville Rd possesses the potential for the recovery of archaeological resources due to the proximity to hydrology, a known archaeological resource, and historic buildings. Key notes on this property are that an assessment was done however it was not considered to be cleared, as per GIS standards. 720 Erbsville is considered a potential resource of interest due to its architectural style and being built in 1900. Majority of the property is also located on a mixed treed lot and floodplain that is considered a provincially significant wetland, titled the Sunfish Lake Laurel Creek Wetland Complex. An archaeological assessment was previously done on a portion of the property, which did not promote a Stage 3 and is deemed cleared of all archaeological resources and concerns where the proposed development is to occur in the farmers field on the southern right portion of the property. However, the northern upper left portion of the property was not assessed, and still contains archaeological potential. Please address. Should there be any future proposed site alteration or development in the additional lands owned by the applicant, as per Regional Official Plan policy 3.G.9, the applicant is required to have a licensed Archaeologist complete an Archeological Assessment of the subject property that has not been documented in the revised August 2022 archaeological report. • The applicant must submit the Archaeological Assessment report(s) to the Ministry of Citizenship and Multiculturalism, and once reviewed and accepted, provide a copy of the Ministry's Acknowledgement letter(s) and the Assessment report(s) to the satisfaction of the Region of Waterloo's Planning, Development and Legislative Services Department.	The Ministry of Tourism, Culture and Sport (MTCS) Acceptance letter was issued on September 5, 2022 and submitted as part of the first OPA and ZBA submission to the City. The MTCS letter, Archaeological Report and Supplementary material have been resubmitted for your convenience. The archaeological assessment and MTCS letter note that the areas identified as being assessed in the report are clear of further archaeological concern. The entire development area of the subject lands was assessed and cleared. A portion of the property identified as "Additional Lands Owned by Applicant" retain archaeological potential and have not been assessed. In these unassessed areas, ground altering activities are not permitted until an archaeological assessment is conducted. There is no ground altering activity proposed on the "Additional Lands Owned by Applicant" and further archaeological assessment is not required at this time.

	The completed Archaeological Assessment(s) and Ministry Acknowledgement(s) will be required as part of a Complete Application.	
	Proposed Official Plan and Zoning By-law Amendments	
135.	Staff has no comments on the OPA/ZBA proposed	Acknowledged