March 25, 2026

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RE: Planning Addendum Letter
Official Plan Amendment and Zoning By-Law Amendment - Re-submission #1
359-369 Erb Street West, City of Waterloo

1. INTRODUCTION

On behalf of 2699847 Ontario Inc. and 2296342 Ontario Inc. ("Owner"), The Planning Partnership ("TPP") is pleased to submit this Planning Addendum Letter to the Official Plan Amendment ("OPA") and Zoning By-Law Amendment ("ZBA") applications (OPA No. 61 & Z-25-06) for the properties municipally known as 359-369 Erb Street in the City of Waterloo ("Subject Site"). The March 25, 2025-dated OPA and ZBA application will permit the redevelopment of the Subject Site for two connected buildings that are 8 storeys in height, stepping down to 6 storeys to the rear, containing 216 dwelling units with 283 bedrooms, including 22 Affordable dwelling units ("Proposed Development").

On behalf of the Owner, between April and June 2025, TPP received detailed comments on the original OPA-ZBA submission from the City, Region, appropriate commenting parties, and the community. Upon careful review and assessment, and based on additional consultation with City staff, the Owner and its consultant team have updated the Proposed Development to address comments and improve the project as a whole.

A detailed comment response matrix has been submitted as part of this resubmission to respond to all comments that were received. This Planning Addendum Letter will review the changes that have been made to the Proposed Development and outline an additional planning and urban design rationale in response to the comments that were provided.

2. OVERVIEW OF KEY CHANGES

The core elements of the Proposed Development remain as-presented in the original OPA-ZBA submission, including proposed use, form of development, and architectural expression. However, key refinements to the Proposed Development have been made to further enhance the transition in scale and compatibility with the neighbouring Low Rise Residential area to the south and increase Landscaped Open Space ("LOS"). These refinements include:

- Removal of the two (2) rearmost units from Level 7 and from Level 8 on the west building (Building A) to reduce the proportion of the building that exceeds the 6-storey as-of-right permitted building height;

- Removal of the one (1) rearmost unit from Level 7 and Level 8 on the east building (Building B) to reduce the proportion of the building that exceeds the 6-storey as-of-right permitted building height; and,
- A significant increase in the amount of LOS as defined by the City's Zoning By-law through rationalization in the size of private patios for the townhouse units at grade, simplification of the barrier-free ramp and retaining wall systems providing Code-compliant accessibility to building entrances, and reduction to surface parking.

It is important to note that the original submission utilized a more conventional definition for LOS than what is presented in the resubmission. Certain common landscape elements, such as retaining walls integral to the planted areas on a sloping site, and private patios and terraces for the townhouse units at grade were included in LOS calculations of the original submission. In response to Staff comments and discussion, which directed the use of a much more restrictive LOS methodology, the revised submission includes an updated LOS calculation that excludes many elements that will still appear and function as landscaped areas.

For reference, please refer to Appendix A – Site Plan Revisions and Appendix B – L7 & L8 Revisions, which present annotated plans indicating areas of revision and supporting commentary. Appendix C – Renderings Revisions provides perspective views of the revisions to the Proposed Development.

Revisions to the Proposed Development result in modifications to the project statistics originally presented in Table 3 of the Planning & Urban Design Rationale in the original submission. The updated Proposed Development Statistics are provided in Table 1, below.

TABLE 1. PROPOSED DEVELOPMENT STATISTICS

	Original Submission		Resubmission #1		Change
Lot Area	5,882 m^2		5,882 m^2		-
Lot Frontage	102.6 m		102.6 m		-
Landscaped Area	1,564 m^2 (26.6%) *Included inadmissible landscaping elements.*		1,827.3 m^2 (31.1%)		263.3 m^2
	620.2 m^2 (10.5%) *Using the conservative methodology directed by City staff*		923.7 m^2 (15.7%)		263.3 m^2
Building Height (max)	Front	8 Sty (24.6 m)	Front	8 Sty (26.4 m)	-
	Rear	6 Sty (20.2 m)	Rear	6 Sty (20.2 m)	-
Height of First Storey	5.84 m		5.84 m		-
Total GFA	13,913 m^2		13,607 m^2		(306 m^2)
Overall Density	498 beds / ha		481 beds / ha		(18 beds/ha)

	Original Submission		Resubmission #1		Change
Residential Units		224		216	(8)
Affordable Housing		22 (10%)		22 (10%)	-
Unit Mix	1-Bed	160 (71%)	1-Bed	154 (71%)	(6)
	2-Bed	59 (26%)	2-Bed	57 (26%)	(2)
	3-Bed	5 (2%)	3-Bed	5 (2%)	-
Bedrooms		293		283	(10)
Vehicle Parking	Resident	207 (0.92/unit)	Resident	204 (0.94/unit)	(3)
	Visitor	23 (0.1/unit)	Visitor	23 (0.1/unit)	-
	Total	230 (1.03/unit)	Total	227 (1.04/unit)	(3)
Bicycle Parking		152 (0.68/unit)		130 (0.6/unit)	(22)
Amenity*		3,837 m^2		4,734 m^2	897

** Recalculated amenity area includes modifications to the Proposed Development and the inclusion of the common amenity area terrace above the parking structure, which was previously omitted.*

3. BUILT FORM REVISION

The proposed refinements to the Proposed Development noticeably reduce the proportion of the building that is greater than 6 storeys. This is achieved by removing the two (2) rearmost units from both Levels 7 and Level 8 on the west building (Building A), as illustrated in Figure 1, below.



FIGURE 1. REVISION TO BUILDING A LEVELS L7 & L8 COMPARED TO ORIGINAL SUBMISSION (APPENDIX B)

A similar revision has been made by removing the one (1) rearmost unit from both Level 7 and Level 8 on the east building (Building B), as illustrated in Figure 2, below.



FIGURE 2. REVISION TO BUILDING B LEVELS L7 & L8 COMPARED TO ORIGINAL SUBMISSION (APPENDIX B)

The removal of the units reduces the area of the Proposed Development that exceeds the as-of-right maximum height of 6 storeys. This reduces the visual scale of the building from a pedestrian point of view on Culpepper Drive and Roosevelt Avenue and provides further compatibility with the *Low Rise Residential* lands to the south through increased setbacks to the 8-storey building element as illustrated in Figure 3, on the following page. Figures 4 and 5, on the following pages, illustrate revisions to the Proposed Development in 3D perspective views, with the yellow area indicating height greater than 6 storeys and red area indicating the reductions to the building height greater than 8 storeys from the original submission.

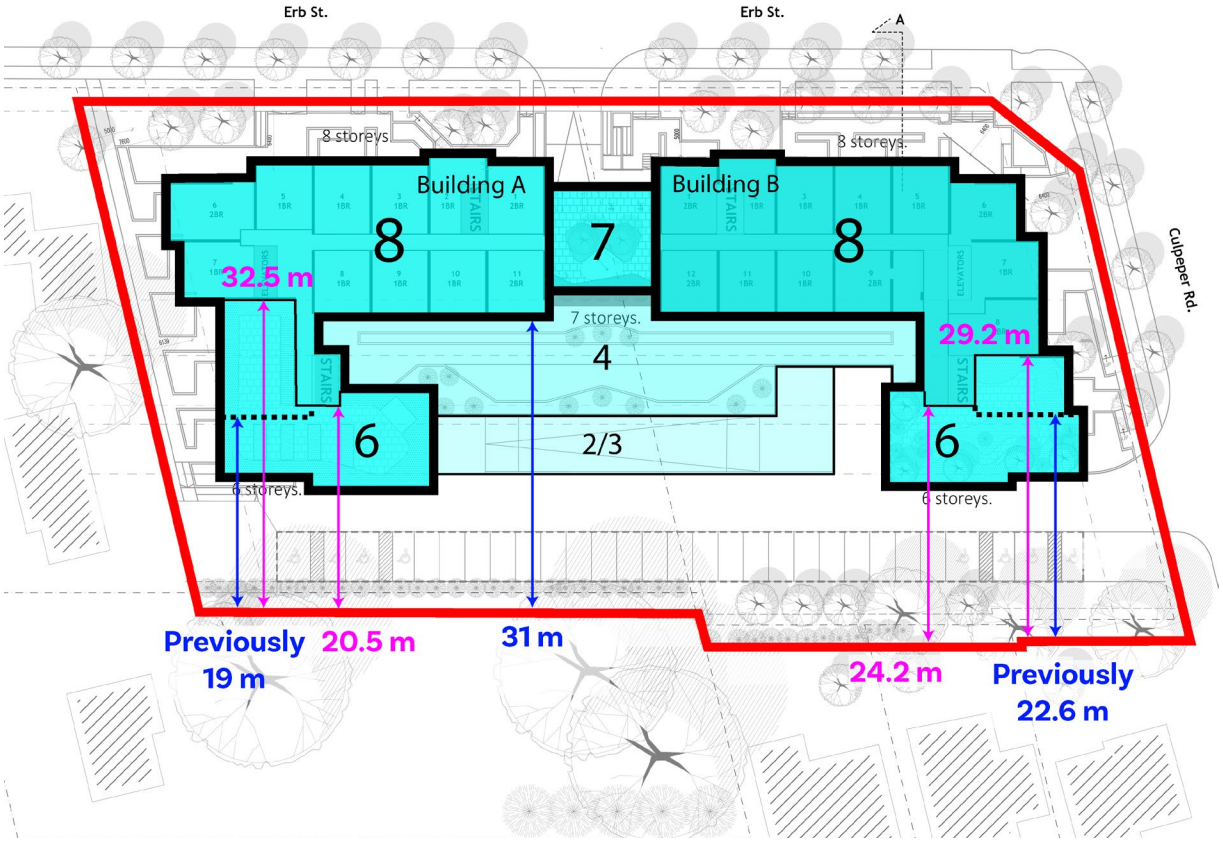


FIGURE 3. REVISION TO PROPOSED DEVELOPMENT INCREASES SETBACKS TO THE REAR PROPERTY LINE (APPENDIX A)



FIGURE 4. REVISIONS TO PROPOSED DEVELOPMENT FROM ORIGINAL SUBMISSION AS VIEWED FROM CULPEPPER DRIVE (APPENDIX C)



FIGURE 5. REVISIONS TO PROPOSED DEVELOPMENT FROM ORIGINAL SUBMISSION AS VIEW FROM ROOSEVELT AVENUE (APPENDIX C)

As a result of these revisions, setbacks from the rear property line to areas of the building greater than 6 storeys have increased. As illustrated in Figure 3, the setback from the rear property line to the closest building elements greater than 6 storeys, which are the fire exit stairwells and connecting hallways for Level 7 and Level 8, have been increased by approximately 1.5 to 2.4 metres from the original submission.

In the original submission, the western portion of the building (Building A) previously had a minimum setback of 19 metres from the rear property line to the building face above 6 storeys. With the proposed changes, this setback has increased to approximately 20.5 metres. In addition, the eastern portion of the building (Building B) previously had a minimum setback of approximately 22.6 metres. With the proposed changes, this setback has increased to approximately 24.2 metres.

In addition, the setback from the rear property line to the closest residential unit located in the building above 6 storeys has significantly increased, from 19 metres to approximately 32.5 metres in Building A, and from 22.6 metres to approximately 29.2 metres in Building B.

In our opinion, the thoughtful and deliberate built form, massing, and architectural design strategy of the original submission has been further enhanced and provides for even greater consistency with the policy directions of the Provincial Planning Statement, 2024 and strongly supports Official Plan direction for compatible, transit-oriented, mid-rise intensification along the Erb St W corridor. The proposed changes result in a modest reduction in the proposed residential density, and achieve a meaningful reduction in the perceived visual impact of the Proposed Development from the adjacent and nearby local roads, and from the low-rise residential area to the rear.

4. LANDSCAPE OPEN SPACE REVISION

The site layout and landscape strategy of the Proposed Development reflect the physical characteristics of the Subject Site and policy objectives for intensification. Moreover, the Proposed Development reflects a considered response to several significant considerations that influence the utilization of site area, including:

- **Maximizing Compatibility** – Prioritizing the transition to the *Low Rise Residential* lands to the south by utilizing a 'C'-shaped building massing around a semi-enclosed podium courtyard and pushing the building footprint towards the west, north, and east site frontages and away from the south property line in order to maximize rear year setbacks and minimize the perceived scale of the building;
- **Good Urban Design** – To positively engage with the Erb St W and Culpepper Dr frontages and help frame the streets, the building massing establishes a strong street edge with minimum front yard setback on Erb St W and side yard setbacks on Culpepper Dr. Townhouse units at grade are provided to contribute to the activation of the public realm while maintaining a residential character;
- **Limiting Parking Visibility** – To minimize the visibility of resident and visitor parking from the public realm, a multi-layered parking strategy utilizes a level of underground parking, two levels of above-grade structured parking integrated into the central courtyard at the rear of the building, and a limited amount of surface parking along the rear property line that will be well-screened from view by privacy fencing, a landscape buffer and parking canopy structure; and,
- **Ensuring Barrier-Free Access** – All building entrances, including private townhouse entrances, are provided with barrier-free access as required by Code. Challenging site topography and grades necessitate the use of ramps and landings.

The effect of these considerations and the characteristics of the Subject Site result in the Proposed Development achieving a LOS rate that is technically lower than the 30% minimum zoning requirement. This updated calculation reflects a much more conservative methodology based on follow-up discussions with City staff that directed the exclusion of certain common landscape elements from the LOS calculation that was used in the original submission. These include:

- **Barrier-Free Ramps, Landings, Pathways, and Retaining Walls** – Site topography necessitates extensive use of ramps, landings, and pathways, and associated retaining walls, in order to provide for barrier-free access to all public building entrances and private building entrances, as now required by the Ontario Building Code;
- **Raised Planter Bed Walls** – It is best practice to define the edge of planted areas, and increase soil volume, through the use of raised planter beds with concrete retaining walls. When planted areas are adjacent to walkways and paved areas, raised planter beds also protect from salt and shoveling/plowing damage; and,
- **Private Townhouse Patios and Terraces** – Generous outdoor living space was provided for townhouse units located at grade with the intention that residents could garden and have landscaping that would further contribute to the activation of the public realm.

The original submission included these landscape elements in the calculation of LOS, yielding an area of 1,564 square metres (26.6%). Utilizing a revised and extremely conservative LOS calculation methodology, the original submission LOS has been recalculated to provide 620.2 square metres (10.5%). Numerous revisions are now proposed to the landscape plan and space allocation to increase LOS while still achieving project objectives and Code compliance for barrier-free access to all building entrances. These are described and illustrated in figures on the following pages. Figure 6, below, provides an overview of the revised Site Plan for the Proposed Development.

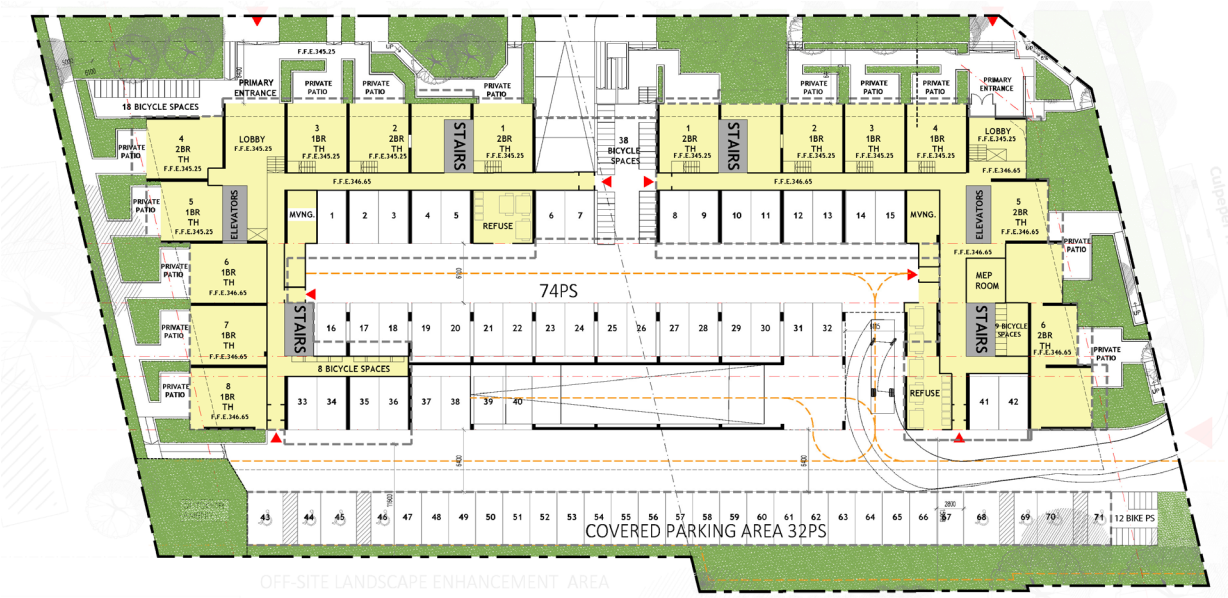


FIGURE 6. REVISED SITE PLAN OF THE PROPOSED DEVELOPMENT

Figures 7, below, illustrates the creation of a 100-square metre landscaped outdoor amenity area through the removal of three parking spaces from the southwest corner of the Subject Site. This change increases the average depth of the landscaped buffer on the west and south property lines.



FIGURE 7. REVISION TO PROPOSED DEVELOPMENT TO CREATE AN OUTDOOR AMENITY AREA (APPENDIX A)

Figure 8, below, illustrates how additional LOS was created through reductions to the size of private patios for the townhouses on the west frontage of the western building element (Building A). Despite these modest size reductions, a minimum patio depth of 3 metres is maintained to ensure functionality.



FIGURE 8. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS BY REDUCING PRIVATE PATIO AREA (APPENDIX A)

Figure 9, below, illustrates how additional LOS was provided along the Erb St W frontage of the western portion of the building (Building A) by using a more efficient configuration of ramps and walkways and reduced private patio area, while maintaining a minimum depth of 3 metres.

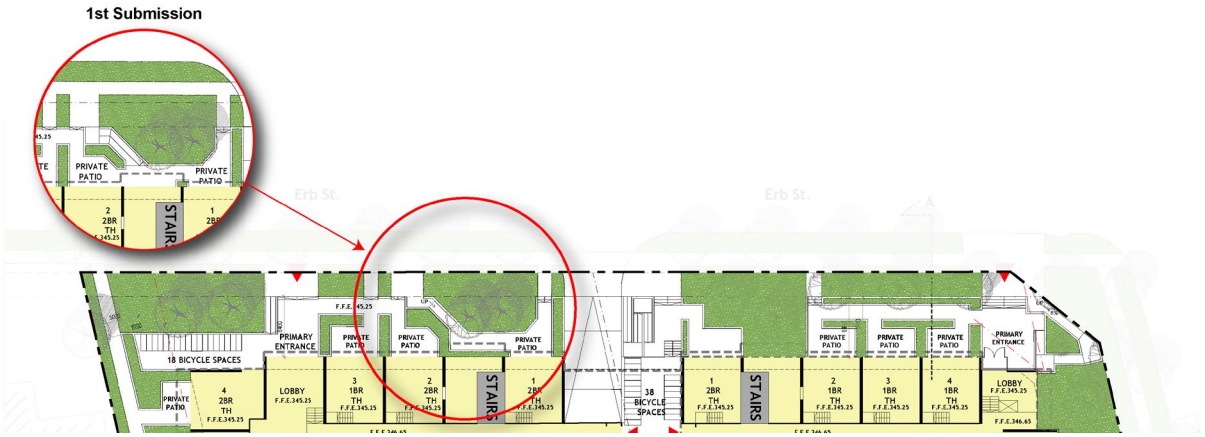


FIGURE 9. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS USING MORE EFFICIENT RAMPS AND WALKWAYS (APPENDIX A)

Figure 10, on the following page, illustrates how additional LOS was provided along the Erb St W frontage towards the corner of Culpepper Dr by using a more efficient configuration of ramps and walkways to the west and east and reduced patio area, while still providing a minimum depth of 3 metres. This approach also supports the preservation of a large existing tree.

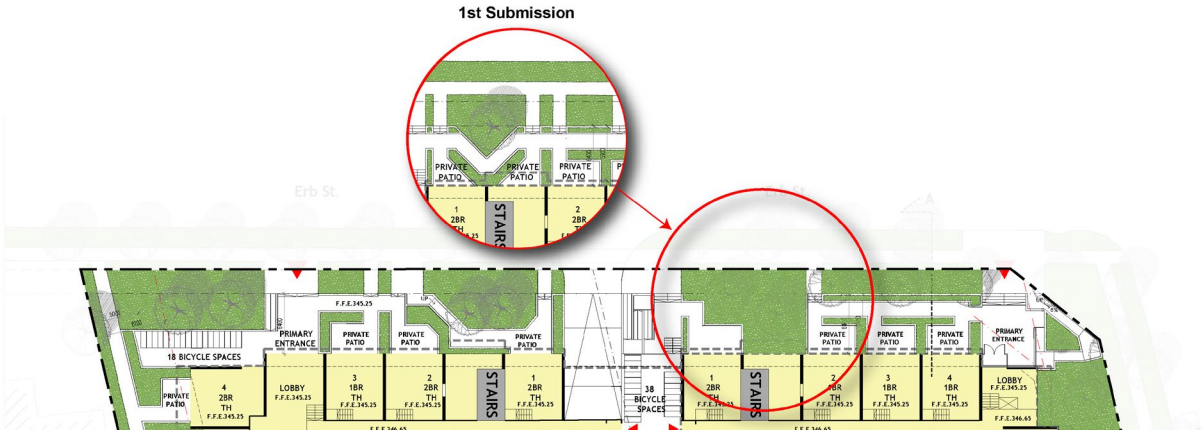


FIGURE 10. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS USING MORE EFFICIENT RAMPS AND WALKWAYS (APPENDIX A)

Figure 11, below, illustrates how reconfiguration of the ramps and walkways providing access to the townhouses enabled the creation of additional LOS to the west as illustrated in in the previous Figure 9. This approach also provides larger and more regularly sized patios for the townhouses along the Erb St W frontage at the corner of Culpepper Dr of the eastern portion of the building (Building B).

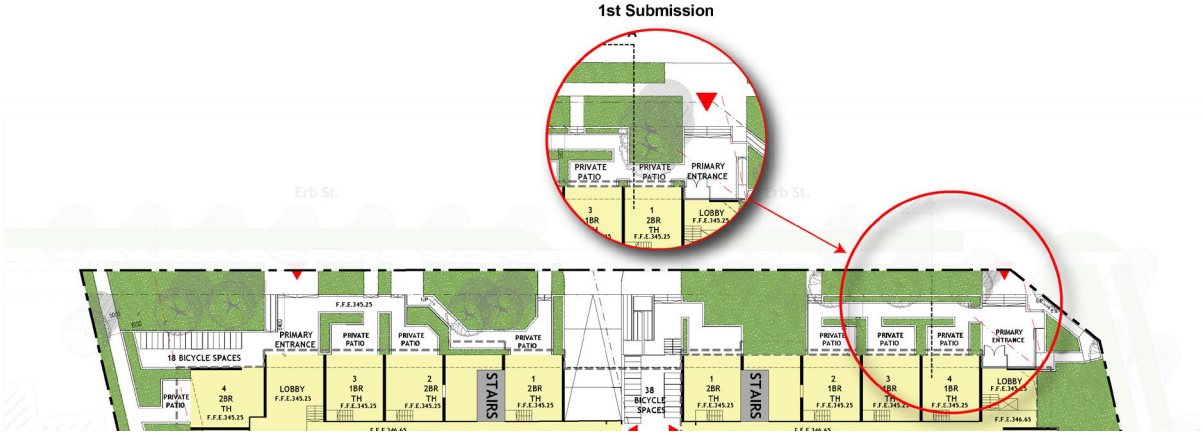


FIGURE 11. REVISIONS TO PROPOSED DEVELOPMENT TO SUPPORT ADDITIONAL LOS TO THE WEST AND PROVIDE MORE USABLE PATIOS (APPENDIX A)

The related Figures 12 and 13, on the following page, illustrate how a significant quantity of additional LOS was created along the Culpepper Dr frontage of the eastern portion of the building (Building B) from the corner of Erb St W south to the driveway. To facilitate this, the four townhouses on this frontage are combined to create two larger townhouses, which permits removal of two patios. A more efficient barrier-free ramp and walkway system is utilized to provide access to the two remaining patios. An additional patio adjacent to the lobby, which could have potentially served as an outdoor amenity area terrace, has also been removed. This results in new large planted areas that have the potential to support larger and more diverse planting and function as a large outdoor amenity space adjacent to the lobby.



FIGURE 12. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS THROUGH REMOVAL OF A PATIO AND MORE EFFICIENT RAMPS AND WALKWAYS (APPENDIX A)

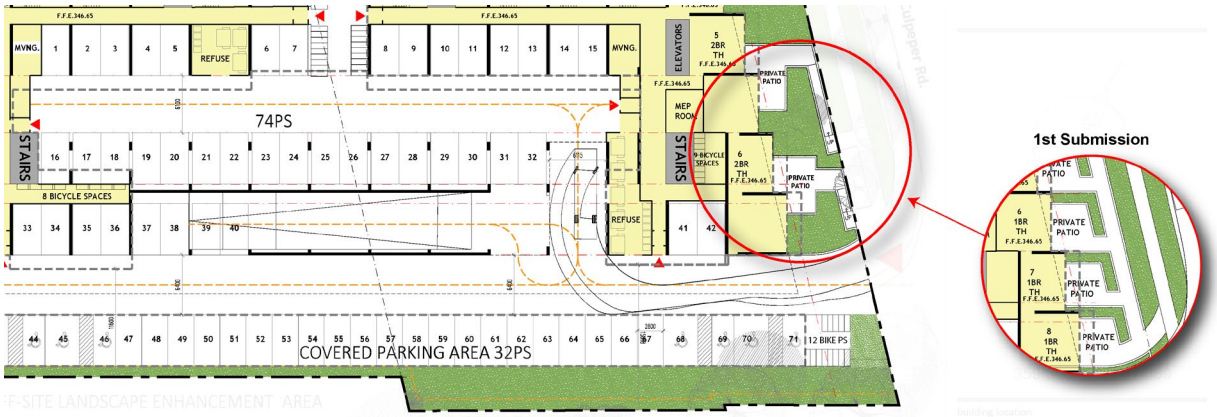


FIGURE 13. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS THROUGH REMOVAL OF TWO PATIOS AND A MORE EFFICIENT RAMP SYSTEM (APPENDIX A)

Figure 14, on the following page, illustrates how additional LOS was created through the relocation of a portion of the bicycle parking at the southeast corner of the Subject Site. This approach also provides for more landscaping along the Culpepper Drive frontage and further expands the large landscape buffer at the south of the Subject Site.

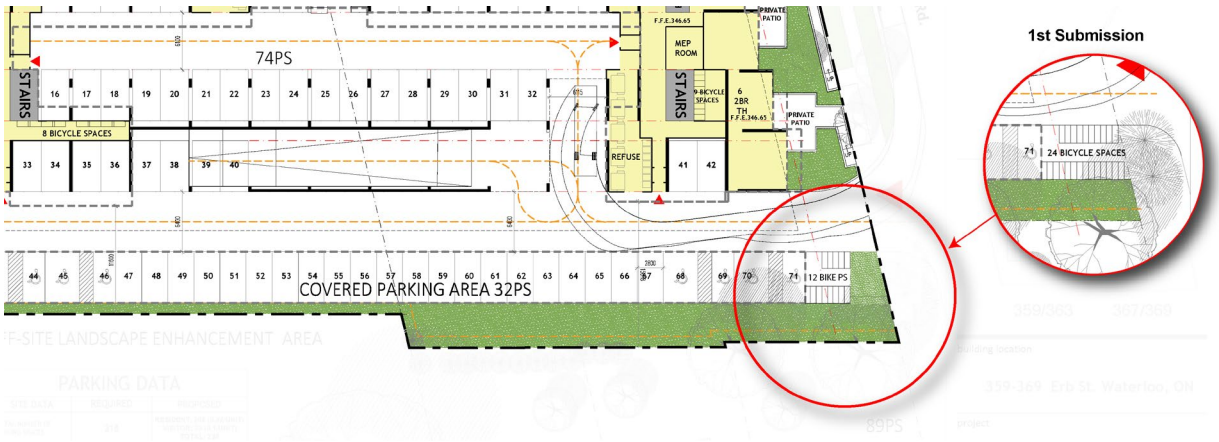


FIGURE 14. REVISIONS TO PROPOSED DEVELOPMENT TO CREATE ADDITIONAL LOS THROUGH RELOCATION OF BIKE PARKING (APPENDIX A)

Overall, these proposed changes add 263.3 square metres of additional LOS to the Subject Site. This additional LOS will further enhance a robust landscape strategy that focuses on optimizing landscaping around the perimeter of the Subject Site, and successfully integrating a thoughtful landscape plan with a ground floor program that promotes family-oriented ground floor units with functional patio areas.

In our opinion, the revisions to landscape plan and site plan enable a meaningful expansion of LOS without compromising Code compliance to provide barrier-free access to all building entrances, or the functionality of private patios and terraces for townhouse units at grade. While the revised LOS calculation excludes various landscape elements, such retaining walls, raised planter bed walls, private patios, walkways and other hardscape areas, that are integral to the provision of barrier-free ramps and landscaping on a sloping site, the Proposed Development provides a layered and appealing landscape plan that enhances the public realm and maximizes the provision of LOS on a compact urban site while increasing total LOS area in real terms by more than 40% over the original submission.

5. TRANSPORTATION

Parking Rate (as modified by Zoning By-law 2025-078)

The revised Proposed Development provides at total of 227 parking spaces to residents and visitors (a decrease of 3 spaces from the original submission). Table 2, below, summarizes the change.

TABLE 2. PROPOSED DEVELOPMENT PARKING SPACES AND PARKING RATE

	Original Submission *(224 dwelling units)*	**Resubmission #1** *(216 dwelling units)*	**Change**
Resident	207 spaces (0.92/unit)	204 spaces (0.94/unit)	(3 spaces) (+0.02/unit)
Visitor	23 spaces (0.10/unit)	23 spaces (0.10/unit)	-
Total	230 spaces (1.02/unit)	227 spaces (1.04/unit)	(3 spaces) (+0.02/unit)

At the November 17, 2025 Council meeting, Zoning By-law Amendment No. 2025-078, amending Zoning By-law 2018-050 on a city-wide basis, was adopted by Council. This by-law revised City of Waterloo Zoning By-law 2018-050 Schedule 'A1' Parking Overlay map to consolidate the former six parking areas down to two new parking rate adjustment areas: Parking Area A, and Parking Area B. By-law 2025-078 also revises parking rates for various zones based on the parking rate adjustment area in which they are located.

Under the revised Schedule 'A1', the Subject Site is located in Parking Area B, whereas it was previously located in the former Parking Area F. The minimum parking rate for the Subject Site under its current Residential Mixed Use (RMU-20) zone has been revised by By-law 2025-078. Zoning By-law policy 7.10.7 now requires a minimum use rate of 0.80 residential use parking spaces per dwelling unit and 0.10 visitor parking spaces per dwelling unit for a total minimum requirement of 0.90 spaces per dwelling unit. Table 3, below, summarizes these changes.

Table 3. Minimum Parking Rate for the Subject Site As Modified By Zoning By-law Amendment 2025-078

Zone	Schedule 'A1' Parking Overlay		Minimum Parking Rate		Change
	Prior Zoning	Per By-law 2025-078	Prior Zoning	Per By-law 2025-078	
RMU-20	Area F	Area B	Use: 1.10 Visitor: 0.10 Total: 1.20	Use: 0.80 Visitor: 0.10 Total: 0.90	Use: (0.30) Visitor: - Total: (0.30)

The downward revision in minimum parking rate for the Subject Site means that the Proposed Development now conforms (and exceeds) with zoning. Thus, the implementing draft Zoning By-law Amendment no longer seeks relief from the former minimum parking rate. Table 4, below, summarizes the change to minimum parking rate.

Table 4. Proposed Development Minimum Parking Rate Conformity - Original Submission and Resubmission #1

Minimum Parking Rate	Original Submission *(RMU-20) | Area 'F' (Former Zoning By-law 2018-050)*			Resubmission #1 *(RMU-20) | Area 'B' (As modified by By-law 2025-078)*		
	Zoning	Provided	Conformity	Zoning	Provided	Conformity
Resident	1.10	0.92	(0.18)	0.80	0.94	✓
Visitor	0.10	0.10	✓	0.10	0.10	✓
Total	1.20	1.02	(0.18)	0.90	1.04	✓

Bicycle Parking

Zoning By-law Amendment 2025-078 also modified Table 6F: Bicycle Parking Space Dimensions in zoning By-law 2018-050, which now defines dimensions for stacked bicycle parking spaces, which the Proposed Development utilizes in specific locations to maximize volumetric utilization of space to accommodate long-term Type A bicycle parking spaces. Thus, the implementing Zoning By-law Amendment will no longer include stacked bicycle parking spaces as a permitted form of bicycle parking.

Site Access

Paradigm Transportation Solutions Limited prepared the Traffic Impact Study (TIS) and Parking Study (PS) for the Original Submission and has prepared an updated TIS for Resubmission #1. The Comments Response Matrix directly addresses comments from Staff, commenting parties, and the community relating to transportation and parking.

With respect to the Proposed Development utilizing two driveway access points to the Subject Site, on Erb St W and Culpepper Dr, Paradigm notes that this strategy has been deliberately deployed to split vehicular traffic between multiple driveways and to reduce site related traffic on Culpepper Drive. These two access points are used at the base assumption in the TIS for the analysis of the Erb St W-Culpepper Dr intersection performance, with the site traffic assigned to each connection based on the proportion of on-site parking served by each driveway (40% to the Erb Street driveway and 60% to the Culpepper Drive driveway).

To address comments from the Region of Waterloo related to the Erb Street connection, and feedback and concerns from the public related to site traffic using Mulberry Lane, Paradigm conducted sensitivity analyses of three scenarios:

- **Scenario 1:** No site access to Erb Street West; all site traffic must use Culpepper Drive
- **Scenario 2:** 50% of site trips to/from the east use Mulberry Lane as opposed to Culpepper Drive; and
- **Scenario 3:** 100% of site trips to/from the east use Mulberry Lane as opposed to Culpepper Drive.

In each scenario above, all study intersections are forecast to operate at acceptable levels of service in both the weekday AM peak hour and weekday PM peak hour. No critical movements are forecast at any of the study intersections. Under Scenario 1, delays and estimated 95th percentile queues for northbound traffic on Culpepper Drive (at Erb Street) are slightly higher (by approximately three seconds per vehicle) and longer (by three metres) as compared to traffic operations if site access is provided to both Culpepper Drive and Erb Street West.

In the opinion of Paradigm, redevelopment of the site is not expected to significantly impact traffic operations at Erb Street West and Culpepper Drive, or Erb Street West and Mulberry Lane. With or without a site access to Erb Street West, the intersection of Erb Street West and Culpepper Drive is forecast to operate at acceptable levels of service and within capacity; however, providing two driveway connections may discourage at least 40% of site traffic from using Culpepper Drive, since this latter connection offers no benefit to residents or visitors parking in the underground parking area accessed via Erb Street West.

6. OFFICIAL PLAN (OPA 58)

On December 17, 2025, the Ministry of Municipal Affairs and Housing (MMAH) approved City of Waterloo Official Plan Amendment 58 (OPA 58), as amended by MMAH. Prior to MMAH amendment and approval, the original updated Official Plan (OP) was approved by City of Waterloo Council in December 2024. The updated OP is intended to streamline and clarify Official Plan policy, encourage compact development to use land efficiently, facilitate more housing

through expanding existing Corridors and creating new ones, removing maximum residential density requirements, and encouraging complete and connected communities through updates to mixed use areas and encouraging good urban design.

For the Subject Site, the land use designation has changed under OPA 58 from *Mixed-Use Medium Density Residential* (OP, 2012 Schedule 'A' Land Use Plan) and *Medium Density, 20 metres* (OP, 2012 Schedule 'B1' Height and Density), to *Medium Rise Residential* (OP, 2024 Schedule 'A' Land Use Plan) and *Medium Rise, 6 storeys* (OP, 2024 Schedule 'B1' Built Form). The primary effect of this change is the removal of the 450 bedrooms / hectare maximum density requirement and a transition to providing maximum building height in storeys (6 storeys), instead of metres (20 metres).

OPA 58 presents a vision for *Medium Rise Residential* areas as being intended to accommodate primarily medium rise housing types and encourage medium density, mixed-use, primarily residential development with Minor Corridors, such as Erb St W, with recognition that properties may also function as a transition from low rise areas.

OPA 58 also modified the designations for the residential area south of the Subject Site. Under OPA 58, these lands have been changed from *Low Density Residential* (OP, 2012 Schedule 'A' Land Use Plan) and *Low Density, 10 metres* (OP, 2012 Schedule 'B1' Height and Density) to *Low Rise Residential* (OP, 2024 Schedule 'A' Land Use Plan) and *Low Rise, 4 storeys* (OP, 2024 Schedule 'B1' Built Form). Similar to the designations for the Subject Site, OPA 58 transitions maximum building height from a prescribed number of meters (10 metres) to a maximum building height in storeys (4).

The revised OP presents a vision for *Low Rise Residential* areas as being intended to accommodate primarily low-rise residential land uses at lower densities than the rest of the city, with some *Low Rise Residential* sites having potential to be zoned to permit stacked townhouses. Several factors must be satisfied for a *Low Rise Residential* sites to be considered suitable for stacked townhouses, including being located on the periphery of a low rise residential neighbourhood and being in close proximity to an existing or planned transit corridor (OP, 2024 Policy 10.1.3.9).

In our opinion, the updated OP continues to support and encourage the conscientious residential intensification of the Subject Site provided by the Proposed Development. OPA 58 recognizes a specific role for the Subject Site's *Medium Rise Residential* designation as a transition from low rise residential areas. The Proposed Development achieves this objective through a building massing approach that locates the 6-storey maximum building height permitted as-of-right as far as possible from the shared property line with adjacent to the *Low Rise Residential* properties to the south. The 8-storey building element is located along the Erb St W frontage and northern part of the Culpepper Dr frontage.

OPA 58 also provides guidance that *Low Rise Residential* properties on the periphery of *Low Rise Residential* neighbourhoods and in close proximity to a Minor Corridor like Erb St W could be suitable for consideration to be zoned for stacked townhouses of up to 4 storeys. This suggests that the City intends for the transition in scale *between Low Rise Residential* neighbourhoods and *Medium Rise Residential* corridors to be further enhanced through the creation of stacked townhouses in appropriate areas to continue a stepping down of prevailing building height.

7. REVISED OPA AND ZBA INSTRUMENTS

Draft Official Plan Amendment

Notwithstanding that OPA 58 had not been approved by the MMHA at the time of the original submission, the draft OPA instrument was prepared in anticipation that the OP 2024, as adopted by Council in December 2024, would imminently come into force. Thus, the draft OPA instrument did not address the maximum permitted density. Revisions to the draft OPA instrument for resubmission #1 are administrative in nature, such as updating the year in the draft By-law and the numbering of referenced policies to match OPA 58, as approved with amendments by the MMHA.

Draft Zoning By-law Amendment

To further refine implementation for the Proposed Development, resubmission #1 revises the draft ZBA instrument to reflect the updated Proposed Development. The revised draft ZBA includes minor administrative updates, such as the year in the draft By-law. Table 5, below, highlights changes to the draft ZBA instrument from the original submission.

TABLE 5. REVISIONS TO DRAFT ZONING BY-LAW AMENDMENT

	Original Submission		Revised Submission		
	Policy #	**Provision**	**Policy #**	**Provision**	**Diff.**
LOW RISE RESIDENTIAL LOT LINE setback *(Min)*	1.1.iii.a)	18.0 m for the western half of the LOW RISE RESIDENTIAL LOT LINE	1.1.iii.a)	20.0 m for the western half of the LOW RISE RESIDENTIAL LOT LINE	2.0 m
	1.1.iii.b)	15.0 m for the eastern half of the LOW RISE RESIDENTIAL LOT LINE	1.1.iii.b)	21.5 m for the eastern half of the LOW RISE RESIDENTIAL LOT LINE	6.5 m
PODIUM Height *(Min and Max)*	-	-	1.1.iv	N/A	Policy added.
TOWER STEPBACK above PODIUM *(Min)*	-	-	1.1.v	N/A	Policy added.
TOWER Footprint *(Max)*	-	-	1.1.vi	N/A	Policy added.
Horizontal TOWER Demonstration *(Max)*	-	-	1.1.vii	N/A	Policy added.
Density – Number of AFFORDABLE	1.1.viii	22 units for a minimum period of XX years [NTD: Details to be	1.1.xii	22 units for a minimum period of 25 years	25 years

	Original Submission		Revised Submission		Diff.
	Policy #	Provision	Policy #	Provision	
DWELLING UNITS *(Min)*		confirmed through application process]			
Parking Rate – Residential Use *(Min)*	1.1.ix	0.9 spaces/dwelling unit	-	-	Removed
Stacked BICYCLE PARKING Spaces	1.1.xii	Stacked BICYCLE PARKING Spaces shall be permitted and shall comply with the following dimensions: a) Length (minimum): 1.8 metres b) Width (minimum): 0.6 metres c) Vertical Clearance (minimum): 1.2 metres d) Access Aisle Width (minimum): 1.75 metres	-	-	Removed
LANDSCAPED OPEN SPACE *(Min)*	1.1.xiii	26%	1.1.xv	15.5%	(10.5%)

8. CONCLUSION

The Proposed Development has been positively refined in response to Staff Comments and discussion. The revised concept further enhances the compatibility of the Subject Site to the *Low Rise Residential* properties to the south. The removal of the units from the L7 and L8 levels at the rear of the building has reduced the proportion of the building that is taller than the 6 storeys permitted as-of-right and increased the setbacks from these taller building elements from the rear property line.

The Proposed Development demonstrated in the original submission that it conforms to a 45-degree angular plane from the rear property line and this remains true for the revised proposal. Notwithstanding that no such policy requirement applies to the Subject Site, we note that 45-degree angular planes are commonly used by municipalities to enforce a transition in scale from mid-rise buildings on a main street to the adjacent low-rise dwellings behind.

Landscaped Open Space has now been calculated more conservatively to omit certain landscape elements, such as barrier-free ramps and associated retaining walls, while also being significantly expanded in real terms. The outdoor landscaped areas are not only larger, but more functional with new outdoor amenity areas and larger and more contiguous planted area that can support a more diverse range of planting.

The Proposed Development effectively implements Provincial and City intensification policies and demonstrates a continuing good faith effort to minimize the negative impacts on the adjacent *Low Rise Residential* area that may result from planned *Medium Rise Residential* growth along the Erb St W Minor Corridor.

We look forward to continuing our excellent and collaborative working relationship with the City as we move forward with this important rental and Affordable housing project. Please contact the undersigned if you have any questions or require any additional information.

The Planning Partnership

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Associate
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APPENDIX A: Site Plan Revisions

Changes from 1st Submission

Patios have been reduced to a minimum depth of 3 metres and redundant patio removed to collectively increase landscaped open space.

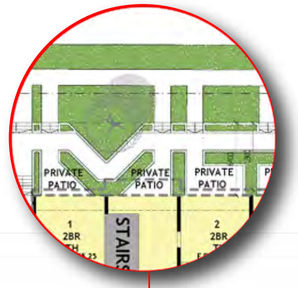
1st Submission



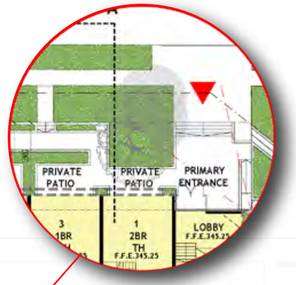
Changes from 1st Submission

Patios have been reduced to a minimum depth of 3 metres, redundant patio removed, and unnecessary walkways to street removed to collectively increase landscaped open space.

1st Submission



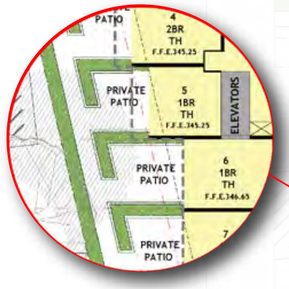
1st Submission



Changes from 1st Submission

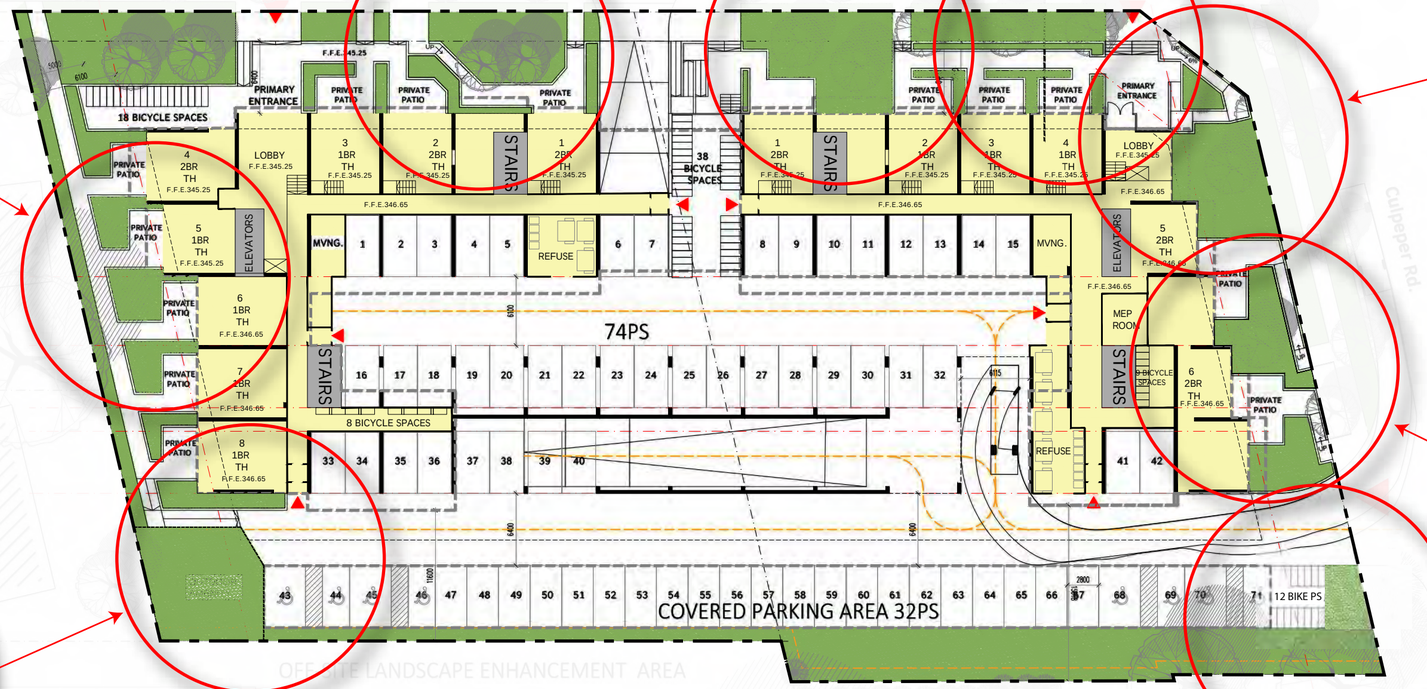
Patios have been reduced to a minimum depth of 3 metres and redundant walkway removed to collectively increase landscaped open space.

1st Submission



Changes from 1st Submission

Patios have been reduced to a minimum depth of 3 metres to increase landscaped open space.



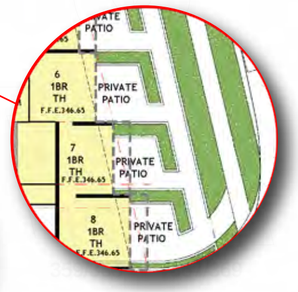
1st Submission



Changes from 1st Submission

Ramp widened and landings enlarged, redundant patio and walkway/ramp removed to collectively increase landscaped open space.

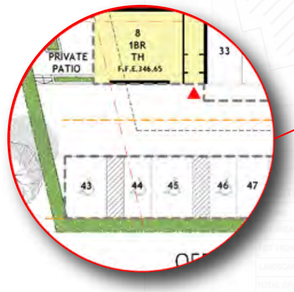
1st Submission



Changes from 1st Submission

Four (4) townhouses combined to become two (2), redundant patios and walkways/ramp removed, remaining patios relocated and reduced to a minimum depth of 3 metres and new walkway/ramps added to collectively increase landscaped open space.

1st Submission



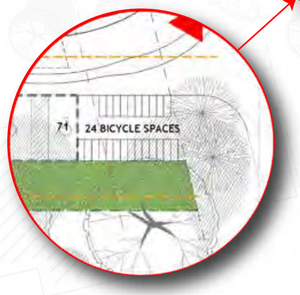
Changes from 1st Submission

Southwest corner of the parking area has been reconfigured to create landscaped open space / resident outdoor amenity area.

Changes from 1st Submission

Relocation of 12 bicycle parking spaces permits an enlarged area for LOS.

1st Submission



359-369 Erb St W, Waterloo, ON

OPA-ZBA | Resubmission #1

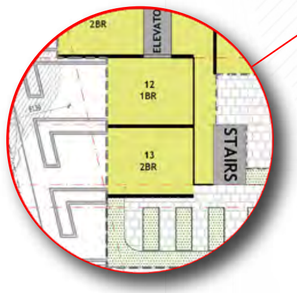
*Demonstration of changes to the **Site Plan (Drawing No. 1)** from the original March 25, 2025 submission.*

March 23, 2026

APPENDIX B: L7 and L8 Revisions



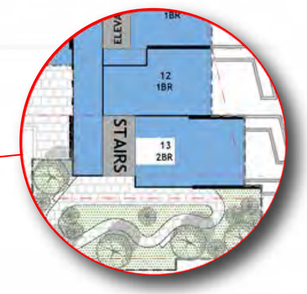
1st Submission



Changes from 1st Submission

Two (2) units on both Level 7 and Level 8 have been removed from the southernmost part of the building. Landscaped area on L7 has been expanded.

1st Submission



Changes from 1st Submission

One (1) unit on both Level 7 and Level 8 have been removed from the southernmost part of the building. Landscaped area on L7 has been expanded.

359-369 Erb St W, Waterloo, ON

OPA-ZBA | Resubmission #1

*Demonstration of changes to the **L7 L8 Level Plan (Drawing No. 6)** from the original March 25, 2025 submission.*

March 23, 2026

APPENDIX C: Renderings Revisions


Building Area Subject to OPA-ZBA Application
Building Area Removed for Resubmission
ERB 355


Building Area Subject to OPA-ZBA Application
Building Area Removed for Resubmission


Building Area Subject to OPA-ZBA Application
Building Area Removed for Resubmission
PARKING


Building Area Subject to OPA-ZBA Application
Building Area Removed for Resubmission