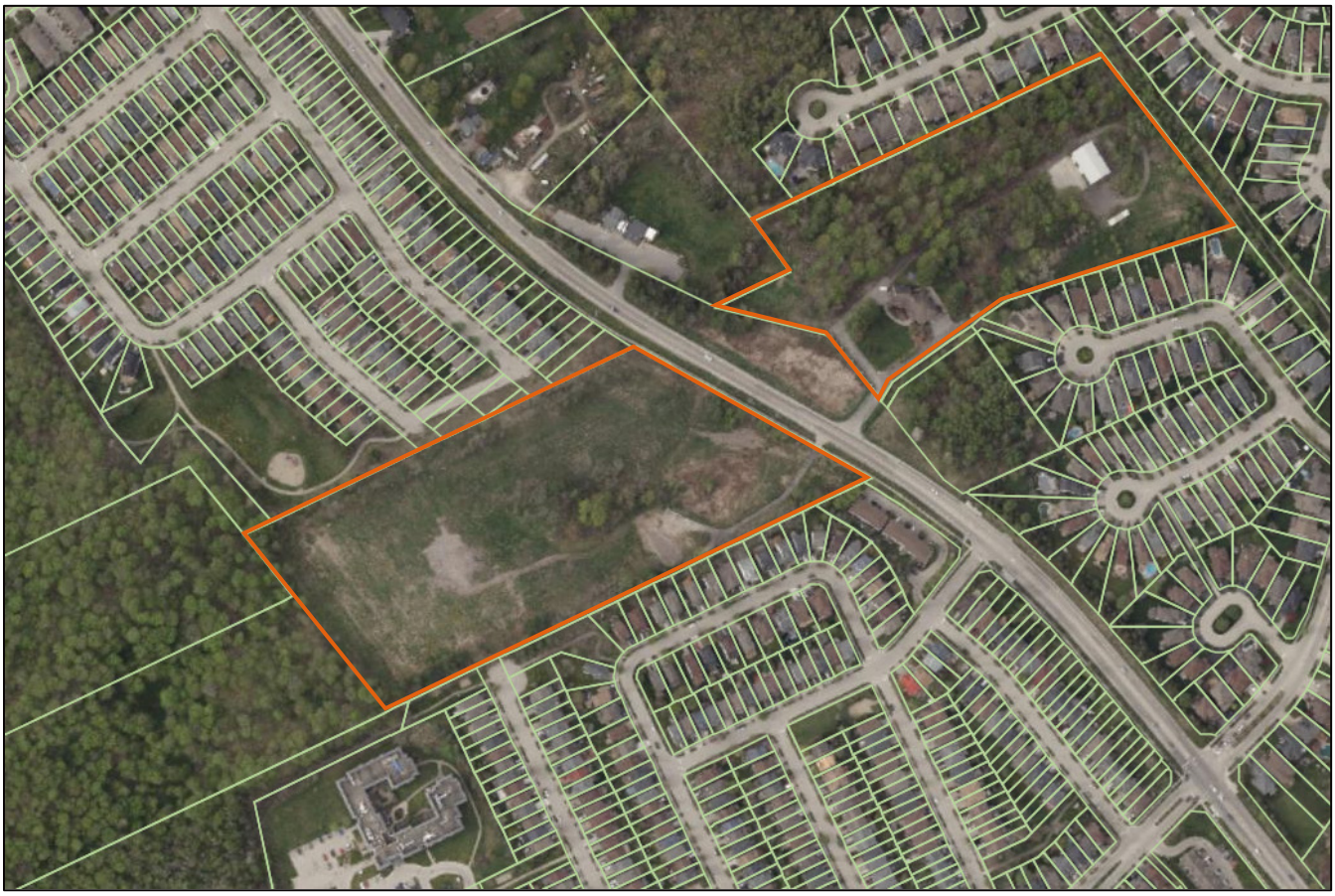
2844319 Ontario Inc. & 10000507877 Ontario Inc.

Planning Justification Report

500 & 515 Erbsville Road, Waterloo

November 13, 2025



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November 13, 2025

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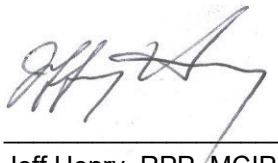

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1 Introduction

On behalf of our clients, 10000507877 Ontario Inc. and 2844319 Ontario Inc., please accept this Planning Justification Report (hereinafter referred to as “Report”) from Arcadis Professional Services (Canada) Inc. in support of their proposed plans of subdivision on the Subject Lands municipally known as 515 Erbsville Road (Subdivision A) and 500 Erbsville Road (Subdivision B). Subdivision A lands are owned by 2844319 Ontario Inc. and Subdivision B lands are owned by 10000507877 Ontario Inc. In consultation with the City, this Report has been prepared in support of related planning applications for Draft Plan of Subdivision for both properties and the related Zoning By-law Amendment for Subdivision A as the development proposal is interrelated with Subdivision A dependent on the infrastructure proposed in and across Subdivision B.

Subdivision A would extend and connect Wild Ginger Avenue, White Birch Avenue, and Royal Fern Street, providing for approximately 79 residential units including 56 units in multi-residential buildings (the “upper subdivision”) along with an additional 96 units in multi-residential buildings with access from Erbsville Road (the “lower subdivision”).

Subdivision B would provide for a stormwater management facility to support Subdivision A with public access to Old Oak Trail at the rear of the property as well as a shared access block between the stormwater management facility block and the remaining lands containing an existing house and driveway that will remain outside the Draft Plan.

Based on consultation with City staff, a Zoning By-law Amendment is required to facilitate Subdivision A and to provide for a limited number of site-specific regulations based on the current concept plan. No Zoning By-law Amendment is required to facilitate Subdivision B.

Based on the review of the applicable land use policies and regulations and in our opinion, the proposed Draft Plans of Subdivision and Zoning By-Law Amendment have regard to the “Matters of Provincial Interest” as defined by the Planning Act, are consistent with the Provincial Planning Statement, and is in conformity with the Region of Waterloo and City of Waterloo Official Plan(s).

Further, it is our opinion that the proposed redevelopment makes efficient use of underutilized lands and municipal infrastructure within a settlement area, provides compatible development with a high quality of urban design, supports the achievement of housing targets, and contributes to the range and mix of housing available within an existing neighbourhood while completing the community. In our opinion, the proposed redevelopment represents good planning, is in the public interest, and is appropriate for the subject properties and the surrounding area.

2 Site Description

500 Erbsville Road has 145.6 m of frontage along Erbsville Road, is 3.658 ha in size, is irregularly shaped, and is legally described as PT LT 30 & 43 GERMAN COMPANY TRACT. As shown in **Figure 2-1**, these lands include a single detached building and driveway to remain along with accessory buildings and related concrete pad to the rear to be removed. These lands previously had a Conservation Easement in favour of the Region of Waterloo requiring reforestation of certain portions of the lands. This easement was released by the Region on February 2, 2025, via instrument WR1621365, enclosed with this submission.

These lands contain locally significant woodlands, generally north of the access drive to the rear accessory buildings, one “other woodland” south of that access drive, and three anthropogenic “other wetlands” generally along a constructed ditch from the mid-southern boundary of the site toward the mid-eastern boundary of the site.



Figure 2-1 *Aerial view with 500 Erbsville outlined in orange (Source: Region of Waterloo GIS Locator, 2024 Aerial Imagery)*

515 Erbsville Road is irregularly shaped and is currently vacant. The portion of these lands that are subject to Subdivision A are trapezoidal in shape, have 183 m of frontage along Erbsville Road, are 4.655 ha in size, and are legally described as PT LT 43 GERMAN COMPANY TRACT, CITY OF WATERLOO BEING PT 1 ON 58R3387. As shown in **Figure 2-2**, these lands are currently vacant and previously included a single detached building, which received a demolition control exemption via approval of IPPW2022-059 on October 3, 2022. The remainder of the lands to the rear are legally described as PT LT 43 GERMAN COMPANY TRACT, CITY OF WATERLOO, BEING PT 2-4 ON 58R3387 and have an area of 5.009 ha. Our understanding is that these lands are to be conveyed separately to the City at no cost consistent with City policies.

These lands contain the Forested Hills ESPA on the rear portion to be conveyed to the City, with two “other wetlands” present in the middle of the site. One of those “other wetlands” was previously an anthropogenic pond that now contains common wetland vegetation. The other is a natural seepage area with groundwater discharge and is surrounded by remnant plantation trees.

The lands previously contained a plantation, which was largely removed after approval of a Region of Waterloo Woodland Removal Permit on December 17, 2021 after the boundary between the plantation and the ESPA was delineated, with buffer trees remaining at the City’s request until the time of a development application along the

northerly and southerly boundaries and with buffer trees remaining around the natural seepage area until an Environmental Impact Study was accepted by the City.



Figure 2-2 *Aerial View with the portion of 515 Erbsville Road subject to Subdivision A outlined in orange with inset showing full lands addressed as 515 Erbsville Road lands with portion shaded in orange to be retained and conveyed separately to the City (Source: Region of Waterloo GIS Locator, 2024 Aerial Imagery)*

Per the Functional Servicing Report prepared by Stantec included with this submission, the following existing municipal services exist abutting the Subject Lands:

- 200 mm sanitary sewer on Wild Ginger, which can provide servicing to the “upper subdivision”,
- 200 mm sanitary sewer on Woodlawn Place, which can be extended to service the “lower subdivision”,
- 200 mm watermains on White Birch Avenue and Royal Fern Street, and 150 mm watermain on Wild Ginger Avenue, which can service the upper subdivision,
- 300 mm watermain on Erbsville Road, which can service the “lower subdivision”, and
- Laurelwood Area V storm network to the east of Subdivision B, which is planned to receive storm flows from the Subject lands.

The Subject Lands are also located within a source protection area under the Source Protection Plan and specifically within WPSA-8. Based on the Hydrogeology Report prepared by Stantec included with this submission, the Subject Lands are not subject to the threat policies of the Source Protection Plan.

Based on the Stage 1 and 2 Archaeological Assessment and enclosed Ministry of Citizenship and Multiculturalism Acknowledgement Letter, there was no identification and document of archaeological resources in Subdivision A and no further archaeological assessment is recommended.

3 Context Analysis

The Subject Lands are mostly surrounded by previous subdivisions that formed predominantly residential subdivisions, specifically Laurel Creek to the north, Columbia Forest to the south, and Laurelwood to the east.

The land uses and street network surrounding Subdivision A are as follows:

- To the north there are single and semi-detached residential buildings on White Birch Avenue and Wild Ginger Avenue as well as Blue Beech Park. Both White Birch Avenue and Wild Ginger Avenue terminate with temporary cul-de-sacs and a connecting access road between them. Within a short distance is a walkway connection to Erbsville Road. Further to the north is the mixed-use node at Laurelwood Drive and Erbsville Road, which contains a variety of commercial uses including a food store and a drug store, multi-unit, mixed-use buildings, and Abraham Erb Public School and Laurel Heights Secondary School.
- To the south there are Royal Fern Park and Butternut Link trail and single detached residential buildings on Butternut Avenue. Semi-detached residential buildings abut Royal Fern Park and single-detached residential buildings abut Butternut Link on Royal Fern Street, which terminates in a temporary cul-de-sac. Further to the south is the Columbia Forest Long-Term Care facility along with other single detached residential buildings in the Columbia Forest subdivision.
- To the west is ESPA 19 (Forested Hills), which is dominated by core natural features and public trails

The land uses surrounding Subdivision B are as follows:

- To the north is the Islamic Centre of Waterloo and single detached buildings along Old Oak Drive. Further to the north are other lands fronting Erbsville Road that may be subject to future redevelopment as well as Old Oak Park and St. Nicholas Catholic School.
- To the east is the Old Oak Link trail with single detached buildings further to the east within the Laurelwood neighbourhood.
- To the south there are single detached buildings on Woodlawn Place along with Woodlawn Park and an unopened trail to Erbsville Road.

As noted above, Blue Beech Park abuts Subdivision A to the north, which will be expanded through development of Subdivision A. Subdivision A will further enhance the trail connections between Columbia Forest to the south and Laurel Creek to the north, facilitating connections to the public trails in ESPA 19.

Recreational outdoor sports fields and a splash pad (under construction) are available to the north within Blue Beech Link Park and, when available to the public, school-owned lands within a 10-minute walk.

Subdivision A is also served by public transit, the existing and planned active transportation network, and the road network:

- GRT local bus route 13 runs along Erbsville Road with stops available at the walkway access from the foot of Blue Beech Drive, which is within a 3- to 7-minute walk (200-500 metres) to the north from the Upper Subdivision and at the intersection of White Elm Road, which is within a 2- to 5- minute walk (150-350 metres) to the south from the Lower Subdivision. Note that route 13 provides 15-minute service during weekdays and 30-minute or better service on evenings, weekends, and holidays, connecting riders to the Boardwalk transit terminal and the University of Waterloo LRT Station and intra/inter-city transit terminal after an approximately 15-minute ride.

- Cycling lanes currently exist along Laurelwood Drive with future all-ages-and-ability network expansion contemplated by the City Transportation Master Plan for Laurelwood Drive and by the Region for Erbsville Road at the time of reconstruction.
- The existing City-wide trail network abutting ESPA#19 will connect through Subdivision A providing access to schools and the mixed-use node to the north, and other neighbourhoods in the district to the south, including Vista Hills. The West Connector trail includes the portion of Old Oak Trail abutting Subdivision B, for which access is proposed over the portions of Subdivision B to be dedicated to the City.
- Erbsville Road is a regional arterial road and currently contains a sidewalk abutting the lower subdivision in Subdivision A. White Birch Avenue, Wild Ginger Avenue and Royal Fern Street are local roads and contain sidewalks on both sides.

Forested Hills (ESPA #19), abutting Subdivision A and including those lands within 515 Erbsville Road not contained within Subdivision A, is identified as a Cultural Heritage Landscape (WL-OPS-1). The preliminary heritage attributes include its natural woodland and wetland habitats, its natural landforms (rolling topography and kettle hole), walking trails, and interpretive signage. Notably, the proposed development completes and complements the walking trail network outside the required setbacks of ESPA #19, providing further protection to the natural woodland by separating residential uses that may otherwise encroach on those lands.

Table 3-1 details notable points of interest in the surrounding neighbourhood and relates to the numbered points in **Figure 3-1**.



Figure 3-1 *Neighbourhood Context Map (Source: City of Waterloo Geocortex Viewer, 2022 10 cm Imagery)*

Table 3-1 *Neighbourhood Points of Interest*

Number	Point of Interest
1	Blue Beech Park
2	Islamic Centre of Waterloo
3	Abraham Erb Public School, Laurel Heights Secondary School, and Blue Beech Link Park
4	St. Nicholas Catholic Elementary School
5	Extendicare Columbia Forest LTC
6	Laurelwood Public School
7	Waterloo Public Library (John M. Harper Branch) and Stork Family YMCA
8	Laurelwood Commons and Mixed-Use Node
9	Laurelwood Mews (Sobey's and other commercial uses)
10	Westmount Sports Park
11	ESPA #19, including public trail network

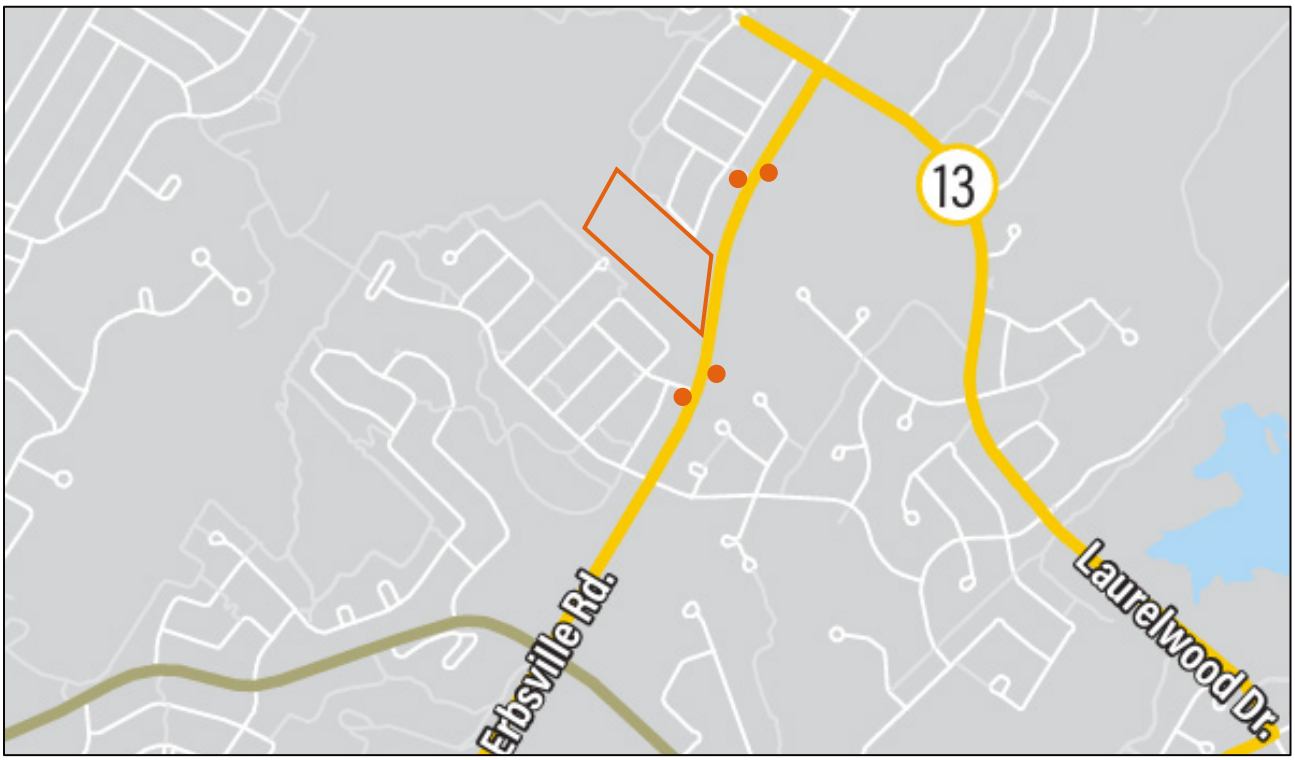


Figure 3-2 *GRT System Map with Subdivision A outlined in orange and the closest bus stops shown with orange circles*

4 Proposal Details

The applicant is proposing to redevelop the Subject Lands to provide for residential uses, a park expansion, and trail connections on Subdivision A and a stormwater management pond with trail connections on Subdivision B while retaining the existing residential dwelling unit at 500 Erbsville Road within Subdivision B.

Subdivision A would extend and connect Wild Ginger Avenue, White Birch Avenue, and Royal Fern Street, providing for approximately 79 residential units including 56 units in multi-residential buildings (the "upper subdivision") along with an additional 96 units in multi-residential buildings with access from Erbsville Road (the "lower subdivision"). Please see **Table 4-1** for a detailed schedule of Subdivision A and **Figure 4-1** for an image.

The conceptual layout is also shown in **Figure 4-2**, with conceptual site data related to Zoning reviewed further in Section 6.6 of this report. Residential uses in Blocks 1-4 and 10-12 will be oriented to and have direct frontage onto the extended municipal streets and anticipated to be single detached buildings, though semi-detached buildings would also be permitted and would continue the existing form provided along Wild Ginger Avenue. Multiple Residential uses in Blocks 5 and 6 are anticipated to be in the form of multiple stacked townhouse buildings with one or two buildings oriented to address the street; however, site design will be confirmed through a future Site Plan Control application.

Table 4-1 *Subdivision A Schedule*

Blocks	Description	Area (ha)	Units	Units/ha
Block 1	Residential	0.076	± 2	± 26
Block 2	Residential	0.079	± 2	± 26
Block 3	Residential	0.469	± 12	± 26
Block 4	Residential	0.295	± 7	± 24
Block 5	Multiple Residential	0.854	± 56	± 66
Block 6	Multiple Residential	1.891 1.108 ha developable area	± 96	± 87 (based on developable area)
Block 7	Open Space (Park)	0.240		
Block 8	Open Space (Natural Heritage)	0.003		
Block 9	Open Space (Trail)	0.091		
Block 10-12	Future Lots (Complete 58M-274)	0.154		
	Rights-of-Way	0.503		
TOTAL		4.655	± 175	± 37.6

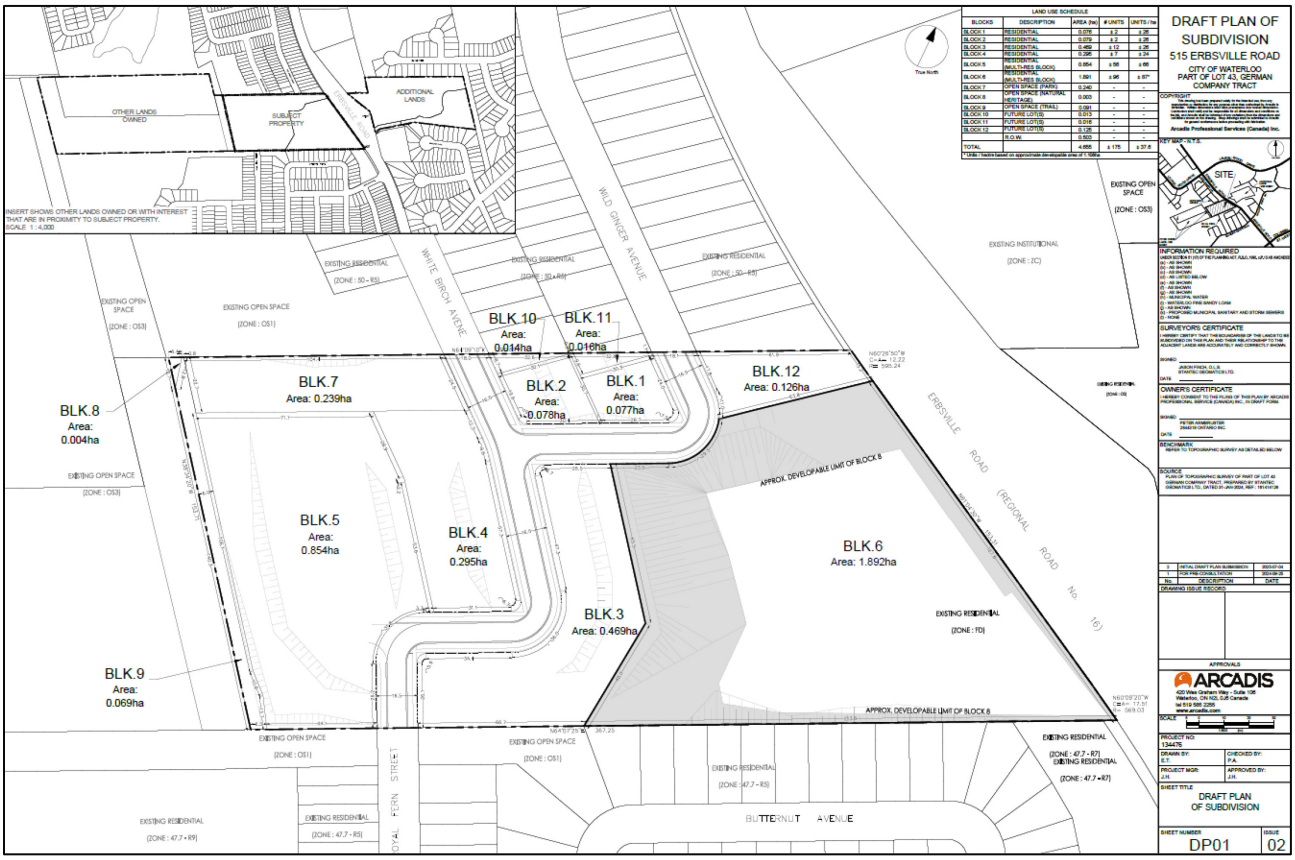


Figure 4-1 *Draft Plan of Subdivision, Subdivision A*

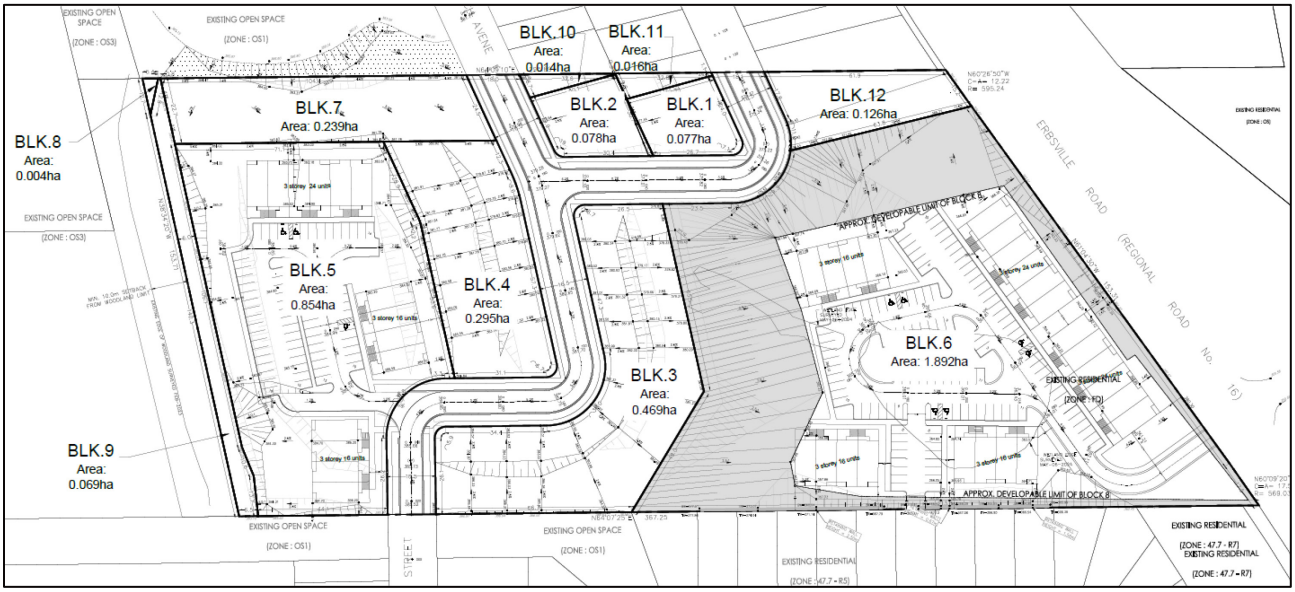


Figure 4-2 *Draft Plan of Subdivision, Subdivision A (Conceptual Layout)*

Subdivision B would provide for a stormwater management facility to support Subdivision A with public access to Old Oak Trail at the rear of the property as well as a shared access block between the stormwater management facility block and the remaining lands containing an existing house and driveway that will remain outside the Draft Plan. Please see **Table 4-2** for a detailed schedule of Subdivision B and **Figure 4-3** for an image.

Table 4-2 *Subdivision B Schedule*

Blocks	Description	Area (ha)
Block 1	Stormwater Management	0.938
Block 2	Additional Lands (Existing Residential)	2.646
Block 3	Access Easement (in favor of Block 2)	0.074
TOTAL		3.658

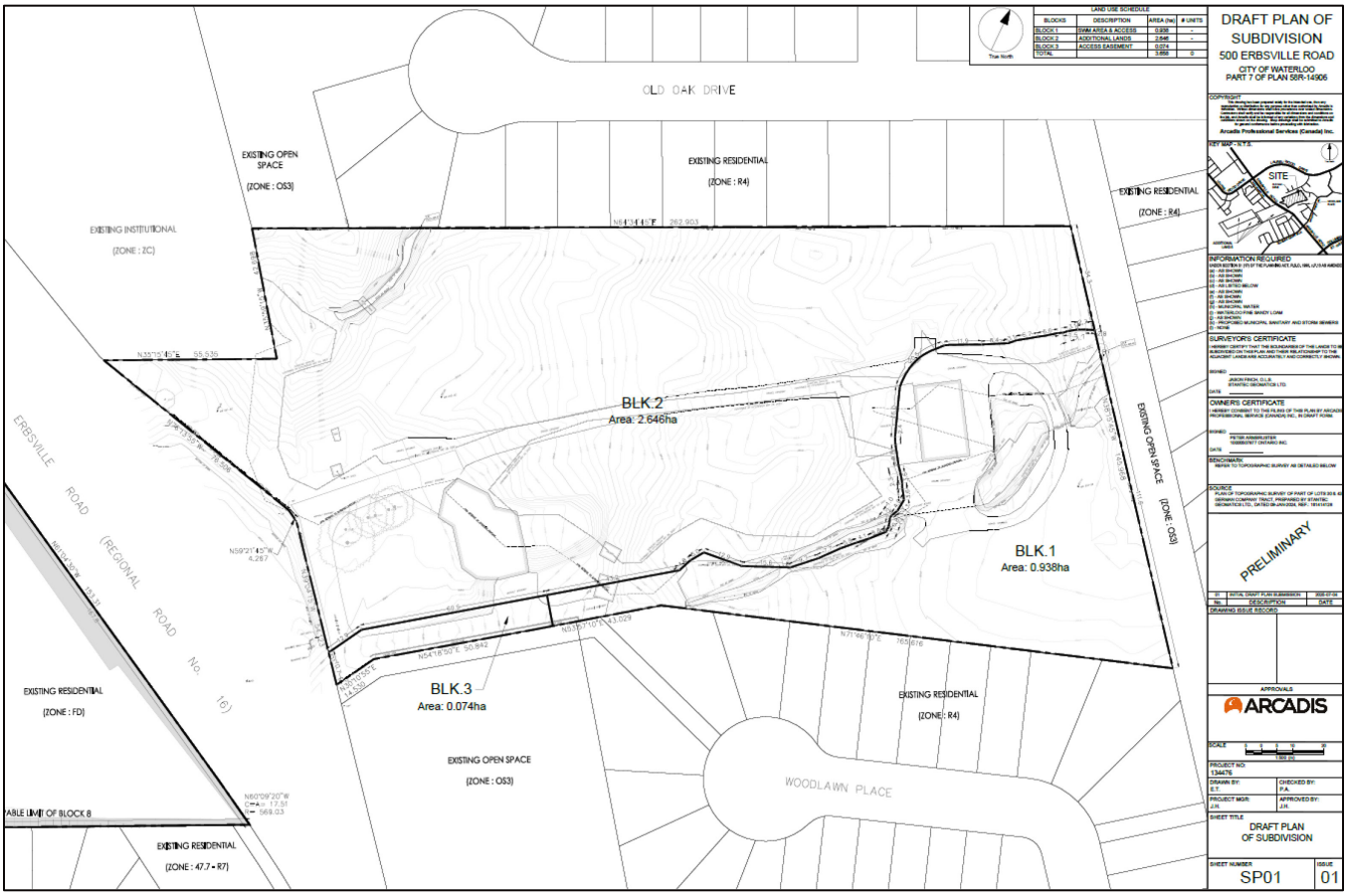


Figure 4-3 *Draft Plan of Subdivision, Subdivision B*

Both Subdivisions A and B are anticipated to be registered in one phase, recognizing that the stormwater management facility in Subdivision B is required to advance Subdivision A". Prior to registration of Subdivision A,

the final lotting of the residential blocks will be determined. The multiple residential blocks will be subject to future Site Plan Control applications after registration of Subdivision A, which may advance at different times with the final layouts subject to further revision. After Draft Plan Approval and through detailed design, this timing difference of the multiple residential blocks and the distinction between the overall “upper subdivision” and “lower subdivision” may lend itself to the phased registration of Subdivision A.

As shown on **Figure 4-4**, the development of the Subject Lands will complete the Columbia Hills District, providing a continuous sidewalk network via the extended municipal roads and a continuous trail network via the trail block and Blue Beech Park expansion. Subdivision B will further provide connections to the Westside Connector at the Old Oak Trail. Note that the City has already planned for a connection from Woodlawn Place to Erbsville Road, which we understand is waiting for the urbanization of Erbsville Road by the Region.

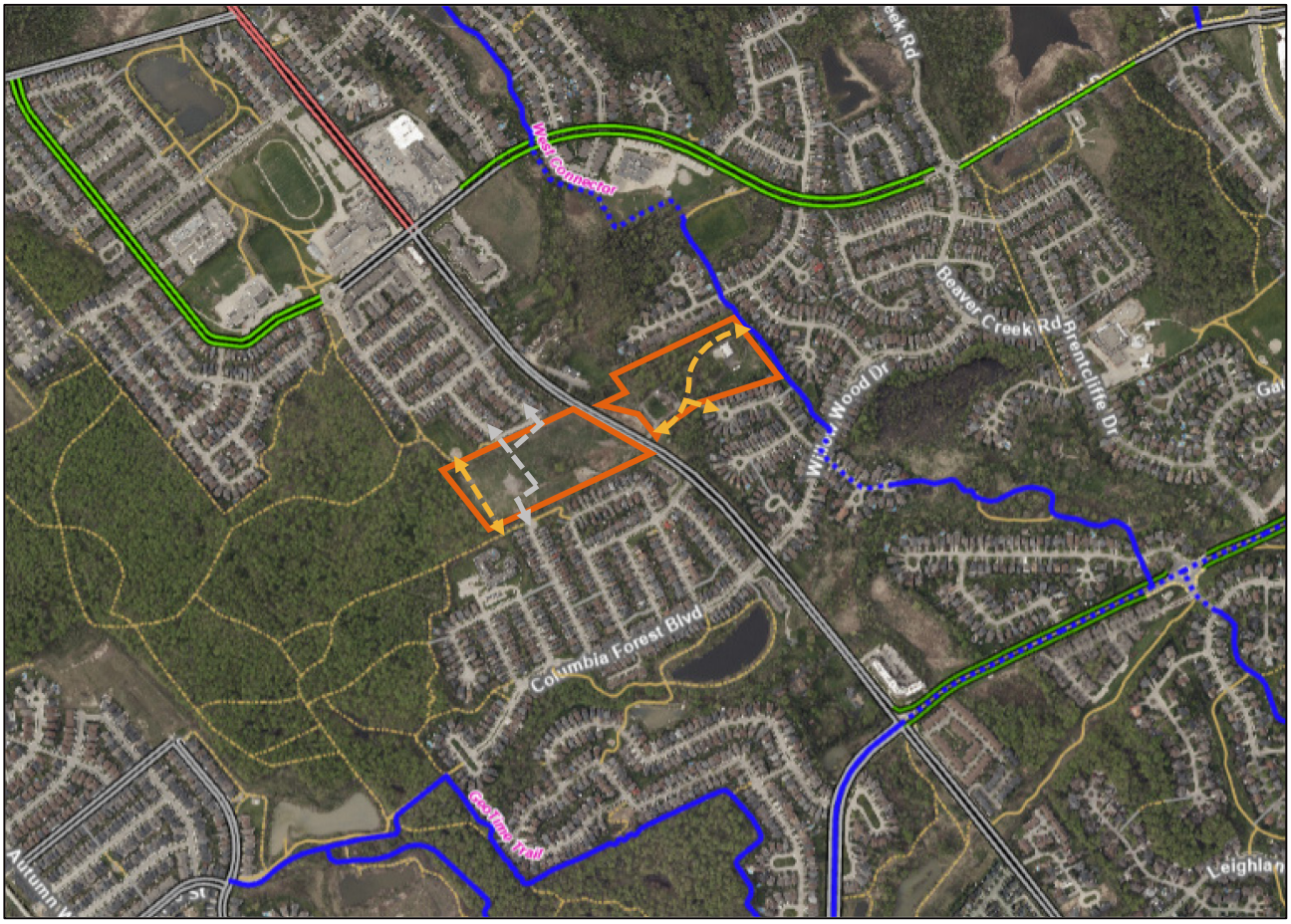


Figure 4-4 *Connectivity Context Map with Subject Lands outlined in orange and dashed lines showing additional connections (Base image from City of Waterloo Geocortex Viewer, 2022 10 cm Imagery showing Major Active Transportation Route layer)*

5 Requested Approvals

Through the pre-consultation process, City staff confirmed that Draft Plans of Subdivision (Subdivision A and B) and a Zoning By-law Amendment are required to facilitate the proposed subdivision and future development of

the lands. Further, City staff confirmed that the applications should be submitted together as the applications are interrelated.

5.1 Draft Plans of Subdivision

To facilitate the proposed redevelopment, the applicant proposes separate but interrelated Draft Plans of Subdivision (Subdivision A and Subdivision B). Conditions of Draft Plan Approval will need to be satisfied prior to registration of the subdivisions.

5.2 Zoning By-Law Amendment

To facilitate the proposed redevelopment, the applicant proposes to rezone the Subdivision A lands and add site-specific provisions to one block. The uses in the proposed Subdivision B conform to the Zoning By-law. No amendment is required.

The proposed minor Zoning By-Law Amendment for Subdivision A is detailed in **Table 5-1** with a detailed planning review and justification follows in Sections 6 and 7 of this Report. A draft of the proposed Zoning By-Law Amendment is provided in the Appendix.

Table 5-1 *Proposed Zoning By-Law Amendment (Subdivision A)*

Blocks	Existing	Proposed Zoning Amendment	Rationale
1-4, 10-12	FD	R5	Residential uses proposed consistent with existing subdivisions to the north/south.
5	FD	R9 with site-specific provisions: • Permit MULTI-UNIT RESIDENTIAL BUILDING and apply regulations for APARTMENT BUILDING in R9 to MULTI-UNIT RESIDENTIAL BUILDING • 6.0 m REAR YARD setback (to BLK 7) • 6.0 m LOW RISE RESIDENTIAL LOT LINE setback (to BLK 4)	Multiple Residential uses proposed of identical form to those approved via site-specific exception C242. Rear yard setback reduction is to park block, providing passive surveillance and allowing sufficient space for emergency vehicle turnaround and parking. Low rise residential lot line setback is limited to the northeast corner due to triangular block configuration.
6	FD	R9 with site-specific provision: • Permit MULTI-UNIT RESIDENTIAL BUILDING and apply regulations for APARTMENT BUILDING in R9 to MULTI-UNIT RESIDENTIAL BUILDING	Multiple Residential uses proposed of identical form to those approved via site-specific exception C242.
7, 9	FD	OS1	Park and Trail blocks proposed
8	FD	OS3	Conservation Lands as identified in EIS.

5.3 Site Plan Application

The proposed multiple residential blocks in Subdivision A will be subject to Site Plan review and approval by the City of Waterloo. Such applications will be advanced after registration of Subdivisions A and B.

6 Policy Review and Planning Justification

This section of the Planning Justification Report provides an overview of the land use policy applicable to the subject property, includes the Planning Act, the Provincial Planning Statement, the Region of Waterloo Official Plan, the City of Waterloo Official Plan (including OPA 58), the Columbia Hills District Plan, and the City of Waterloo Zoning By-Law.

6.1 Planning Act

The Planning Act, R.S.O. 1990 sets out the legislative framework for land use planning in Ontario and provides the authority for the Minister of Municipal Affairs and Housing to issue policy statements and plans to guide land use planning and redevelopment in the province. The Act also sets out the legislative framework for local land use planning tools and plans, including Official Plans, Zoning By-Laws and Site Plan Approvals.

6.1.1 Matters of Provincial Interest

Section 2 of the Planning Act sets out various “Matters of Provincial interest” which decision makers must have regard to in carrying out their duties under the Act. These matters are summarized and addressed in **Table 6-1**.

Table 6-1 *Review of Regard for Matters of Provincial Interest*

Provincial Interest	Demonstration of Regard
a. The protection of ecological systems, including natural areas, features and functions;	No negative impact on the ecological systems is anticipated, and the function of the existing features will be maintained. The portion of the Forested Hills ESPA and related buffers within the 515 Erbsville Rd lands will also be transferred to public ownership. Please refer to Environmental Impact Studies for more detail.
b. The protection of agricultural resources of the Province;	No agricultural resources will be lost because of the proposed redevelopment.
c. The conservation and management of natural resources and the mineral resource base;	The Subject Lands are not identified as having mineral resources. The Region approved the removal of the plantation previously on Subdivision A.
d. The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	No features of significant architectural, cultural, historical, archaeological, or scientific interest will be impacted by the proposed redevelopment. See the Stage I and II Archaeological Assessment Report for details.

Provincial Interest	Demonstration of Regard
e. The supply, efficient use, and conservation of energy and water;	The Subject Lands are currently located within the Delineated Built-Up Area. The proposed development represents an efficient use of the existing supply of water to the subject lands and surrounding community. Please see the Energy Study for details of energy performance related to the concept development forms.
f. The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The proposed development can be adequately serviced by municipal sewage, storm drainage, water services, and utilities as detailed in the Functional Servicing Report. As the subject property is located within the Delineated Built-Up Area, the proposed redevelopment represents the efficient use and logical extension of existing services.
g. The minimization of waste;	The existing detached dwelling on Subdivision A was previously removed through an approved demolition permit. No further demolitions are proposed to facilitate the redevelopment.
h. The orderly development of safe and healthy communities;	The proposed subdivisions are located within the Delineated Built-Up Area. Subdivision A connects existing subdivisions to the north and south to complete the Columbia Hills district while providing additional parkland and trail connections. Subdivision B provides further trail connections and consolidates required stormwater management facilities, while mitigating existing overland flow conditions to adjacent residential uses through the regrading of Old Oak Trail lands with a berm to convey the regional storm event.
h.1 The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The proposed trail blocks will conform to the standards and regulations of the Accessibility for Ontarians with Disabilities Act (AODA), 2005. The road network in Subdivision A will include sidewalks on both sides of the street.
i. The adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	The Subject Lands are within proximity to numerous educational, cultural, and recreational facilities.
j. The adequate provision of a full range of housing, including affordable housing;	The proposed development will contribute to the supply of housing by providing a range of housing forms, including more attainable multiple unit residential uses.
k. The adequate provision of employment opportunities;	The proposed development will provide additional housing, supporting the adequate provision of a full range of housing in the City of Waterloo. Further, the proposed development will provide spaces for residents to undertake home occupations or to work

Provincial Interest	Demonstration of Regard
	from home and its construction will support employment opportunities in Waterloo.
l. The protection of the financial and economic well-being of the Province and its municipalities;	The proposed development will provide spaces for residents to undertake home occupations or to work from home and its construction will support employment opportunities in Waterloo.
m. The co-ordination of planning activities of public bodies;	The residential uses on the subject property will contribute to and protect the financial and economic well-being of the Province, Region, and City of Waterloo through an increase in the number of housing units.
n. The resolution of planning conflicts involving public and private interests;	The proposed development implements and considers the applicable Provincial and local planning framework.
o. The protection of public health and safety;	The proposed development will contribute to the housing stock by providing additional housing units, including more attainable multiple residential forms, in the City of Waterloo. The proposed development is designed to consider and be compatible with the surrounding uses in the area.
p. The appropriate location of growth and development;	The proposed development will promote the protection of public health and safety by contributing to the supply of housing in an appropriate location and conforming to the requirements of the OBC and the AODA.
q. The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The proposed development is located within the Delineated Built-Up Area in proximity to commercial, educational, cultural, and recreational, extends the road, sidewalk, and trail network within the Columbia Hills district, and is served by existing public transit. In our opinion, this is the appropriate location for this type of development, it is designed to be sustainable, supports public transit, and is oriented towards pedestrians.
r. The promotion of built form that, i. is well-designed, ii. encourages a sense of place, and iii. provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.	The proposed development completes the community, connecting the subdivisions and related road and trail networks to the north and south while expanding and enhancing the existing Blue Beech Park. The subdivision layout is well-designed, permits the continuation of similar built form with the addition of multi-residential blocks at appropriate locations in the context of existing subdivisions, existing parks and trails, and the topography.

Provincial Interest	Demonstration of Regard
s. The mitigation of greenhouse gas emissions and adaptation to a changing climate.	The proposed development will feature high-quality architectural design and will complement and enhance the existing character of the surrounding neighbourhood, including detached dwellings that may be constructed to net zero-ready standards subject to market conditions and multi-unit residential buildings that exceed OBC energy efficiency requirements, which will mitigate greenhouse gas emissions. Refer to the Energy Study enclosed for details.

It is our professional opinion that the proposed redevelopment has regard for the "Matters of Provincial Interest" as required by the Planning Act.

6.1.2 Plans of Subdivision

The Planning Act provides criteria under Section 51(24) for which regard shall be had. These matters are summarized and addressed in **Table 6-2**.

Table 6-2 *Review of Criteria under Section 51(24)*

Criteria	Demonstration of Regard
a. The effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The proposed development has regard for matters of provincial interest. Please see Section 6.1.1 for more detail.
b. Whether the proposed subdivision is premature or in the public interest;	Subdivision A completes the community, connecting the existing subdivisions to the north and south, consistent with the Columbia Hills District Plan. Subdivision B provides for necessary stormwater management infrastructure and connections to existing trails to be publicly owned.
c. Whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The proposed development conforms to the Official Plan and the adjacent plans of subdivision. The road extensions, removal of the temporary road, removal of the cul-de-sac, and Blocks 10-12 of Subdivision A permit six full lots and three partial lots within 58M274 as well as one lot within 58M170 to be developed.
d. The suitability of the land for the purposes for which it is to be subdivided;	Subdivision A considered the challenging topography of the site in designing the street network and locating residential and multi-unit residential blocks. Subdivision B locates the proposed stormwater management facility appropriately. Based on the submitted studies, the lands can be appropriately serviced, and the proposed development conforms to applicable policies.

Criteria	Demonstration of Regard
d.1 If any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;	No affordable housing units are being proposed. Multi-unit residential blocks are provided to ensure a range of housing types are provided, including more attainable forms of housing that are not currently present in the neighbourhood.
e. The number, width, location, and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	As described in the Functional Servicing Report, the internal road grades of Subdivision A are graded in accordance with City of Waterloo standards up to the maximum allowable road slope of 8% in one instance. The width of the extended roads maintains the existing width on abutting lands and completes the road network generally in accordance with the Columbia Hills Block Plan, as discussed in Section 6.5 of this Report.
f. The dimensions and shapes of the proposed lots;	Subdivision A provides blocks that can meet the requirements of the Zoning By-law, subject to a limited number of site-specific provisions in the multi-unit residential blocks that are appropriate in this context as described later in this report.
g. The restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	Block 3 in Subdivision B provides an access easement in favour of Block 1 to facilitate continued access to the garage of the existing single detached dwelling to remain.
h. Conservation of natural resources and flood control;	The Stormwater Management Report, prepared by Stantec, demonstrates that peak flows post-development will be at or below pre-development flows.
i. The adequacy of utilities and municipal services;	The Functional Servicing Report, prepared by Stantec, demonstrates that the proposed development can be adequately serviced by municipal sewage, storm drainage, water services, and utilities.
j. The adequacy of school sites;	No concerns were raised by WCDSB at pre-consultation. No comments were received from WRDSB at pre-consultation. The proposed development is in proximity to both Public and Catholic Elementary Schools and Public Secondary Schools.
k. The area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	Subdivision A proposes the dedication of road right-of-ways as well as Block 7 (Park), Block 8 (Conservation), and Block 9 (Trail) to the City of Waterloo. Other owned lands to the west that form part of 515 Erbsville Road and within the ESPAS will also be conveyed to the City at no cost.

Criteria	Demonstration of Regard
	Subdivision B proposes the dedication of Block 1 (Stormwater Management) and Block 3 (Access) to the City, subject to an access easement over Block 3 in favour of Block 2.
l. The extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and;	Conceptual development in Blocks 5 and 6 provides for multi-residential buildings with a north-south orientation to maximize solar exposure. The existing road pattern of adjacent subdivisions limits the ability to provide similar orientations for most units in the residential blocks. The overall pattern is optimized given the context, including considerations of existing lotting of White Birch Avenue and Wild Ginger Avenue.
m. The interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41(2) of this Act or subsection 114(2) of the *City of Toronto Act, 2006*;	Blocks 4 and 5 of Subdivision A will be subject to Site Plan Control. Consideration has been given through conceptual design of these blocks to site plan control matters.

It is our professional opinion that the proposed redevelopment has regard for the criteria under Section 51(24).

6.1.3 Official Plan and Zoning By-Law Amendment

The Planning Act establishes the legislative basis for Zoning By-Law Amendment applications. The proposed application is being requested pursuant to Section 34.

6.2 Provincial Planning Statement

The new Provincial Planning Statement (PPS) took effect on October 20, 2024, and consolidates both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019, for a streamlined province-wide land use planning policy framework that builds upon housing supportive policies.

The PPS provides policy direction on "Matters of Provincial Interest" related to land use planning and provides provincial policy direction for key land use planning issues by promoting more housing, building strong communities, a clean and healthy environment, and supporting sustainable economic growth by directing development to existing settlement areas, encouraging efficient and cost-effective land use development patterns, and protecting natural resources for the long term.

The PPS is to be read in its entirety, and applicable policies are to be applied to specific situations/applications. **Table 6-3** provides a summary of relevant policies of the PPS and describes how the proposed redevelopment is consistent with this policy direction.

Table 6-3 *Review of Consistency with the Provincial Policy Statement*

Policy No.	Policy	Discussion of Consistency
2.1 Planning for People and Homes		
2.1.4	To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.	The proposed development will assist the City of Waterloo in meeting this policy requirement, as it will add 175 housing units to the City's housing stock. This will provide greater housing options for current and future residents of the City of Waterloo.
2.1.6	Planning authorities should support the achievement of complete communities by: a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs; b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and	a) The proposed development will add to the mix and range of uses in Columbia Hills by providing approximately 175 new residential units, including 122 within multi-unit residential buildings. The proposed residential uses will be located in proximity to a wide range of uses in or adjacent to the neighbourhood through the extended/connected sidewalk and trail network. b) The proposed development provides a sidewalk and trail network that conforms to the standards and regulations of the AODA 2005 and the Ontario Building Code. The concept design provides appropriate numbers and locations of

Policy No.	Policy	Discussion of Consistency
	c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups	barrier-free parking spaces within the mutli-unit residential blocks, which will be confirmed through a future Site Plan Application. c) The proposed development expands Blue Beech Park and completes the trail network, which provides access to a range of amenities and services including ESPA#19, providing access to nature
2.2 Housing		
2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by: a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs; b) permitting and facilitating: 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within	a) No affordable housing units are being proposed. Multi-unit residential blocks are provided to ensure a range of housing types are provided, including more attainable forms of housing that are not currently present in the neighbourhood, enhancing access for a wider range of households. b) The proposed development provides a range of housing units, including multi-unit residential development that is more attainable than single and semi-detached residential development that is predominant in the neighbourhood.

Policy No.	Policy	Discussion of Consistency
	previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3; c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations	c) The proposed development achieves densities that efficiently uses land and supports the use of active transportation through the inclusion of multi-unit residential development strategically located within a topographically challenging site. d) The proposed development extends and connects the existing sidewalk and trail network, providing access to existing transit service and a range of amenities concentrated at the mixed-use node to the north of the subject lands.
2.3 Settlement Areas and Settlement Area Boundary Expansions		
2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	The proposed development is within a settlement area and will promote the vitality of the Columbia Hills district and the City of Waterloo.
2.3.1.2	Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities; c) support active transportation;	a) The proposed development makes efficient use of land through the consolidation of stormwater management facilities and a range of housing forms, connecting existing subdivisions and following the topography of the lands. b) The proposed development makes efficient use of the existing available infrastructure and public service facilities, providing logical extensions of services within the district and consolidating stormwater management. c) The proposed development connects and extends the existing sidewalk and trail network in proximity to transit and a range of commercial, education, and recreational uses and amenities.

Policy No.	Policy	Discussion of Consistency
	d) are transit-supportive, as appropriate; and; e) are freight-supportive.	d) The proposed development provides access to transit service through connections to the existing sidewalk and trail network. e) The proposed development is within an existing residential neighbourhood and is not within 300 metres of a rail corridor, so will not negatively impact freight and freight-supportive activities.
2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities	The proposed development provides for the intensification of the subject lands in a manner that completes the community, consistent with the Columbia Hills District plan. Subdivision A provides for a range and mix of housing options. Subdivision B provides for a consolidated stormwater management facility.
2.9 Energy Conservation, Air Quality and Climate Change		
2.9.1	Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that: a) support the achievement of compact, transit-supportive, and complete communities; b) incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities; c) support energy conservation and efficiency; d) promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and e) take into consideration any additional approaches that help	The proposed development may include net zero-ready detached buildings, subject to market conditions, and will provide better-than-OBC energy efficiency in multi-unit residential buildings. The proposed development further connects and extends the existing sidewalk and trail network in proximity to transit, providing alternatives to the use of energy intensive automobile usage and improving air quality. The proposed development provides a consolidated stormwater management facility and lot-level infiltration galleries and clean water collection system.

Policy No.	Policy	Discussion of Consistency
	reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.	
3.2 Transportation Systems		
3.2.1	Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero-and low-emission vehicles.	The proposed development connects the existing subdivisions to the north and south, completing the community consistent with the Columbia Hills District Plan, facilitating a more efficient movement of people and goods within the neighbourhood.
3.2.2	Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.	The proposed development extends and connects the existing street and trail network consistent with the Columbia Hills District Plan. The Transportation Impact Study, prepared by Paradigm, confirmed the existing intersections are forecast to operate at acceptable levels of service and within capacity with no specific problem movements, including queue length impact.
3.2.3	As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be planned for, maintained and, where possible, improved, including connections which cross jurisdictional boundaries.	The proposed development is in proximity to a range of commercial, educational, and recreational uses that can be accessed via the sidewalk, trail, and transit networks. The proposed development may also reduce the length of trips to the existing mixed-use node from the subdivision to the south through the subject lands using the extended sidewalk and trail networks.
3.6 Sewage, Water and Stormwater		
3.6.1	Planning for sewage and water services shall: a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services; b) ensure that these services are provided in a manner that:	The proposed development completes an existing neighbourhood with existing municipal services, promoting the optimization of the use of this infrastructure. See the Functional Servicing Report for more information related to this policy.

Policy No.	Policy	Discussion of Consistency
	1. can be sustained by the water resources upon which such services rely; 2. is feasible and financially viable over their life cycle; 3. protects human health and safety, and the natural environment, including the quality and quantity of water; and 4. aligns with comprehensive municipal planning for these services, where applicable. c) promote water and energy conservation and efficiency; d) integrate servicing and land use considerations at all stages of the planning process; e) consider opportunities to allocate, and re-allocate if necessary, the unused system capacity of municipal water services and municipal sewage services to support efficient use of these services to meet current and projected needs for increased housing supply; and f) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.	
3.6.2	Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.	Extension and connection to existing municipal sewage services and municipal water services are proposed. Please see the Functional Servicing Report for more details.

Policy No.	Policy	Discussion of Consistency
3.9 Public Spaces, Recreation, Parks, Trails and Open Space		
3.9.1	Healthy, active, and inclusive communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity; b) planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources; c) providing opportunities for public access to shorelines; and d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.	a) Subdivision A extends and connects the existing road, sidewalk, and trail network consistent with City engineering and accessibility requirements, facilitating active transportation and community connectivity. Subdivision B provides a public connection to Old Oak Trail. b) A Park Needs Assessment and Conceptual Park Plan will be required as a Condition of Draft Plan Approval of Subdivision A. Subdivision B provides a public trail connection adjacent to the stormwater management facility, providing views of water. c) Not applicable. d) Conservation lands within 515 Erbsville (ESPA #19) will be dedicated to the City with adjacent trail network extensions facilitating access.
4.1 Natural Heritage		
4.1.2	The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.	The Environmental Impact Studies identified that no areas exist as, or provide opportunity for, natural linkages on the Subject Lands given the context. Two linkages are identified adjacent to Subdivision B, with regeneration of woodlands between adjacent features to the north and vegetative unit 2 that shall be retained.
4.1.3	Natural heritage systems shall be identified in Ecoregions 6E & 7E, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.	The Environmental Impact Studies identified, delineated, and assessed the natural heritage system within and adjacent to the Subject Lands.

Policy No.	Policy	Discussion of Consistency
4.1.4	Development and site alteration shall not be permitted in: a) significant wetlands in Ecoregions 5E, 6E and 7E; and b) significant coastal wetlands	Based on the Environmental Impact Studies, a) None is present. Small wetlands present are delineated and assessed under City Official Plan policies. b) Not applicable
4.1.5	Development and site alteration shall not be permitted in: a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E; b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River); c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River); d) significant wildlife habitat; e) significant areas of natural and scientific interest; and f) coastal wetlands in Ecoregions 5E, 6E and 7E that are not subject to policy 4.1.4.b), unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.	Based on the Environmental Impact Studies, a) Not applicable b) ESPA is to be retained in full with a 10m development setback and other mitigation measures c) None are present d) No negative impacts are anticipated with the implementation of recommended protection and mitigation measures given abundant habitat in the local landscape. e) None are present f) Not applicable
4.1.6	Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements	Based on the Environmental Impact Studies, no fish habitat subject to the Fisheries Act is present and downstream fish habitat (Laurel Creek reservoir) is separated from the Subject Lands by a municipal storm sewer.
4.1.7	Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.	No confirmed endangered or threatened species habitat is present on the Subject Lands. Removal of a small amount of potentially suitable habitat for endangered bat species will not contravene the Endangered Species Act since much larger, higher quality habitat will be retained and potential

Policy No.	Policy	Discussion of Consistency
		impacts mitigated with appropriate timing of tree removals.
4.1.8	Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.	Based on the Environmental Impact Studies, no development and site alteration is proposed on adjacent lands
4.2 Water		
4.2.2	Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches	Based on the Environmental Impact Studies, no sensitive surface water features are present on or adjacent to the Subject Lands. One sensitive ground water feature is present in Subdivision A (vegetative unit 5), whose function of conveyance of water to non-sensitive downstream features will be protected and maintained via the recommended stormwater management strategy.

Based on the above analysis, it is our opinion that the proposed redevelopment is consistent with the PPS.

6.3 Region of Waterloo Official Plan

The Regional Official Plan (ROP) sets out the policy direction of land use planning in the Region over a 20-year planning horizon. The Ministry of Municipal Affairs and Housing approved a new Regional Official Plan (ROP) in 2010. The decision was subsequently appealed to the Ontario Municipal Board (OMB), who issued a decision in June 2015, allowing the ROP to come into full force and effect. All planning decisions within the Region of Waterloo must conform to the ROP, including the proposed Zoning By-Law Amendment and Draft Plan Applications.

Region of Waterloo Official Plan Amendment No. 6 (ROPA No. 6) was approved by Regional Council in August 2022 and was approved with modifications by the Minister and further revised through Bill 150, Planning Statute Law Amendment Act, 2023 and in effect as of April 11, 2023. Subsequently through Bill 162, Get It Done Act, 2024, additional modifications were made to the Official Plan, which were deemed to have come into force on December 6, 2023.

This amendment was undertaken as a municipal comprehensive review to address conformity issues with recent updates to the Planning Act, the Provincial Policy Statement, and the Growth Plan for the Greater Golden Horseshoe, determine land needs for community areas and employment areas with associated intensification and density targets, designate employment areas and remove selected lands from previously designated employment

areas, and map Major Transit Station Areas and set associated density targets. The amendment replaced in their entirety Chapter 1, 2, and 3A with further amendments to the Glossary and Maps.

On January 1, 2025, the Region of Waterloo became an upper-tier municipality without planning responsibilities, and the ROP became an additional Official Plan for the City of Waterloo. Future amendments to integrate the ROP with the City of Waterloo Official Plan and address conformity issues are anticipated following a decision by the Minister on OPA 58 to the City of Waterloo Official Plan.

The ROP determines areas for growth and development, sets out population and employment forecasts and density targets, establishes an Urban Boundary, promotes multi-modal transportation options, and sets out policies to protect the Region's valuable environmental and agricultural resources.

6.3.1 Regional Structure and Urban System

The ROP identifies the subject property as Urban Area on 'Map 1 Regional Structure' and Delineated Built-Up Area on 'Map 2 Urban System' abutting Erbsville Road, which is a Regional Road (**Figure 6-1**). The Delineated Built-Up Area includes all lands within the built boundary of the Region's Urban Area and Township Urban Areas as of June 16, 2006.

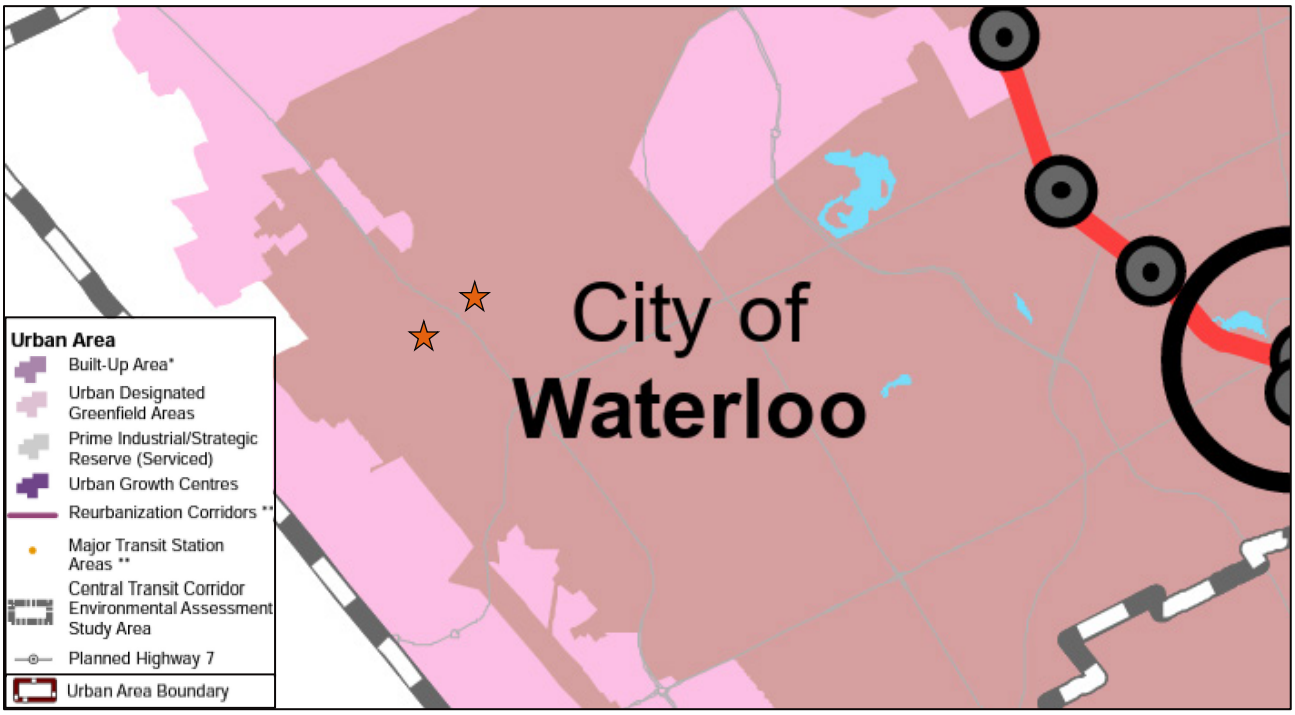


Figure 6-1 *Region of Waterloo Official Plan, Map 3a - Urban Area, with the Subject Lands identified with stars*

The ROP directs that a minimum of 61 per cent of the Region's new residential development will occur within the delineated built-up area through intensification annually, including 83 per cent within the City of Waterloo (ROP Chapter 2, Table 3), to optimize infrastructure, support the achievement of 15-minute neighbourhoods through a more compact built form, and support a transition of the region to an energy-efficient, low-carbon community.

The proposed development will help satisfy the Region's intensification target with a compact built form, completing the existing community, and optimizing infrastructure in a location that is serviced by transit with a wide range of amenities within a 15-minute walking or cycling distance.

Development within the Urban Area is subject to Policy 2.C.2.2 of the ROP, which is discussed in **Table 6-4**.

Table 6-4 *Discussion of Conformity with ROP Urban Area Development Policies*

Policy	Discussion of Conformity
2.C.2.2 Area municipalities will develop official plan policies and implementing zoning by-laws, and other planning documents or programs to ensure that development occurring within the Urban Area is planned and developed in a manner that:	
a. Implements the Regional urban system described in this Plan;	The proposed development provides intensification within the Regional and City's Delineated Built-Up Area.
b. Advances the community's transition into an energy-efficient, resilient, low-carbon community by: i. promoting a more compact built form that enables a modal shift to most trips being made by walking, cycling, and rolling; ii. contributing to the creation of 15-minute neighbourhoods; iii. reducing air pollution and achieving the greenhouse gas emission reduction targets of this Plan; iv. improving resilience to extreme heat, increased precipitation, increased frequency of extreme weather events and other impacts of a changing climate; v. integrating green infrastructure and appropriate low impact development;	i. The proposed development includes a range of housing types in a more compact built form, including multi-unit residential development, while extending and connecting the existing street and trail network to enable walking, cycling, and rolling to nearby commercial, educational, and recreational uses; ii. The proposed development completes the Columbia Hills district, enabling more direct connections through the extension and connection of the existing street and trial network to key destinations within the neighbourhood iii. The proposed development may include net zero-ready residential uses, subject to market conditions, and will include better-than-OBC multi-unit residential uses, while providing key active transportation connections iv. The proposed development expands Blue Beech Park, provides for street trees and private tree planting, and the conservation of ESPA #19 lands. As discussed in the Functional Servicing Report, the proposed regrading of the Old Oak Trail lands with a berm will provide an overland flow route to convey the regional storm event to Old Oak Street rather than between existing residential dwellings. v. LID is included with the subdivision design. Please see the Stormwater Management Report prepared by Stantec for more detail.

Policy	Discussion of Conformity
vi. promoting building designs and orientations that maximize renewable energy generation and conservation, including the use of alternative and/or renewable energy systems, and the creation of net-zero operational carbon buildings; vii. ensuring that any new development requiring site plan or plan of subdivision approval under the Planning Act meets the requirements of the area municipalities' High Performance Development Standards adopted in accordance with Policy 2.B.1.2 of this Plan; viii. maximizing tree canopy for shaded areas and community greening within delineated built-up areas and designated greenfield areas; and ix. supporting, and, where enabled, requiring all new buildings to be built to achieve net-zero operational carbon, and to implement measures to minimize embodied carbon and building energy needs, support the energy transition off fossil fuels, and increase energy resiliency;	vi. The detached residential units, if built to net zero-ready standards, would provide 50% energy reduction and 72% operational carbon reduction compared to a baseline building. If not built to net zero-ready standards, Energy Star performance would provide a 17% operational carbon reduction. Options are also provided for multi-unit residential uses that may provide between 9-50% energy reduction and 16-83% operational carbon reduction compared to a baseline building. Refer to the Energy Study for more detail. vii. The City of Waterloo has not yet adopted High Performance Development Standards to implement Policy 2.B.1.2, and current provincial direction may or may not permit such implementation. Refer to the Energy Study for more detail on the options the applicant is considering to maximize the performance of the proposed building. viii. Conservation lands with extensive tree canopy will be conserved through the application with an ecological enhancement plan proposed (see Arborist Report for details, prepared by WSP). The Blue Beech park expansion may provide for additional tree canopy plantings consistent with a conceptual parks plan required as a condition of Draft Plan Approval. New street trees will be provided as part of the proposed development, anticipated as a condition of Draft Plan Approval. Landscape plans for the multi-unit residential blocks may be considered through the Site Plan process. ix. Refer to the Energy Study for more detail on options the applicant is considering to maximize energy conservation and reduce operational carbon usage.
c. is serviced by a municipal water and wastewater system, except where specified in accordance with Policy 2.J.8;	The proposed development will be serviced by extensions of existing municipal water and wastewater services. Please see the Functional Servicing Report for details.

Policy	Discussion of Conformity
d. protects the natural environment, including the Grand River and its tributaries, and surface water and groundwater resources in accordance with the policies in Chapter 7 and 8;	The Hydrogeological Report, prepared by Stantec, confirms the subject lands are in a significant groundwater recharge area, but is not within an area designated a highly vulnerable aquifer. The proposed development maintains the existing water balance to maintain required infiltration rates. The lands are further within a WPSA-8 area in the ROP, identified as low threats to source water and so are not subject to the threat policies of the Source Protection Plans. Section 59 Notices have been included with this submission.
e. provides a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes, in accordance with all the applicable policies of this Plan;	The proposed development provides a mix of housing types, with the multi-unit residential uses containing 2- and 3-bedroom units that are more attainable than the detached residential uses which predominate the neighbourhood. Detached residential uses may include additional residential units if desired by future owners.
f. conserves cultural heritage resources and supports the adaptive reuse of built heritage resources in accordance with the policies in Chapter 3;	The Stage I and II Archaeological Assessment did not identify any archaeological resources on Subdivision A per the Ministry Acknowledgement letter enclosed with this submission. As reviewed in the Environmental Impact Study and Section 3 of this Report, Subdivision A does not negatively impact cultural heritage resources being the adjacent Cultural Heritage Landscape (Forested Hills ESPA #19). The resource is protected through appropriate buffers, while the provided trail extension/connection prevents new residential uses from encroaching on the lands.
g. avoids development and land use patterns that may pose a risk to public health, safety and the environment;	The proposed development is not anticipated to cause/create any environmental or public health and safety concerns. As noted in the Hydrogeological Report, prepared by Stantec, the designation of the Subject Lands is not subject to the threat policies in the Source Protection Plans.
h. improves accessibility for persons of all ages and abilities and at all times of year by addressing built form barriers which restrict their full participation in society;	The proposed development provides a sidewalk and trail network that conforms to the standards and regulations of the AODA 2005 and the Ontario Building Code. The concept design provides appropriate numbers and locations of barrier-free parking spaces within the multi-unit residential blocks, which will be confirmed through a future Site Plan Application.

Policy	Discussion of Conformity
i. ensures the development of high quality urban form through site design and urban design standards that create an attractive and vibrant public realm;	The proposed development will provide for a high quality urban form and create an attractive and vibrant public realm consistent with the existing subdivisions to the north and south. See Urban Design Brief for more details. Site design of the multi-unit residential blocks will be confirmed through a future Site Plan Application.
k. considers the wellbeing and belonging of all children and youth; and	The proposed development provides a range of housing forms that are appropriate for households with children and youth, expands Blue Beech Park, and extends and connects the sidewalk and trail network to provide walking, cycling, and rolling connections to nearby schools.
j. expands residents' convenient access to: i. a range of transportation options, including to a mobility network that is safe, comfortable and convenient for walking, cycling, and rolling for people of all ages and abilities and at all times of year; ii. public service facilities, co-located and integrated in community hubs; iii. appropriate supply of safe, publicly accessible urban greenlands, open spaces, parks, trails, and other opportunities for recreation in accordance with the policies in Chapter 3; and iv. healthy, local, and affordable food options in neighbourhoods, supported through urban agriculture and a thriving food system built on local farming, and food production and processing that feeds much of the community in	i. The proposed development extends and connects the existing sidewalk and trail network, completing the safe, comfortable, and convenient neighbourhood mobility network. ii. The proposed development is in proximity to local schools and, via transit, to the Waterloo Public Library (John M. Harper Branch). iii. The proposed development expands Blue Beech Park and extends and connects the trail network, providing access to ESPA trails and recreational open space (other parks, future splash pads) within the neighbourhood. iv. The subject property is located within walking distance of the Food Basics to the north. Community gardens may be considered through the Park Needs Assessment. Future residents may choose to grow local food on private lands.

Policy	Discussion of Conformity
accordance with the policies in Chapter 3.	

In our opinion, the proposed development complies with the Regional Structure and Urban System policies of the ROP.

6.3.2 Source Protection Plan

The subject property is located within a source protection area under the 2022 Grand River Source Protection Plan. Notices of Source Protection Plan Compliance (Section 59 Notice) for Subdivision A and Subdivision B have been included with this submission.

Map 6a of the ROP indicates that the Subject Lands are located within WPSA-8, as displayed in **Figure 6-2**. ROP Policy 8.A.18 provides that very high risk uses will not be permitted, closed-loop geothermal wells are prohibited, and that open-loop geothermal wells may be permitted subject to further study in accordance with Policy 8.A.4.

No specific restrictions from these policies impact the proposed development, as reviewed further through the Hydrogeological Report, prepared by Stantec. Geothermal wells are not proposed.

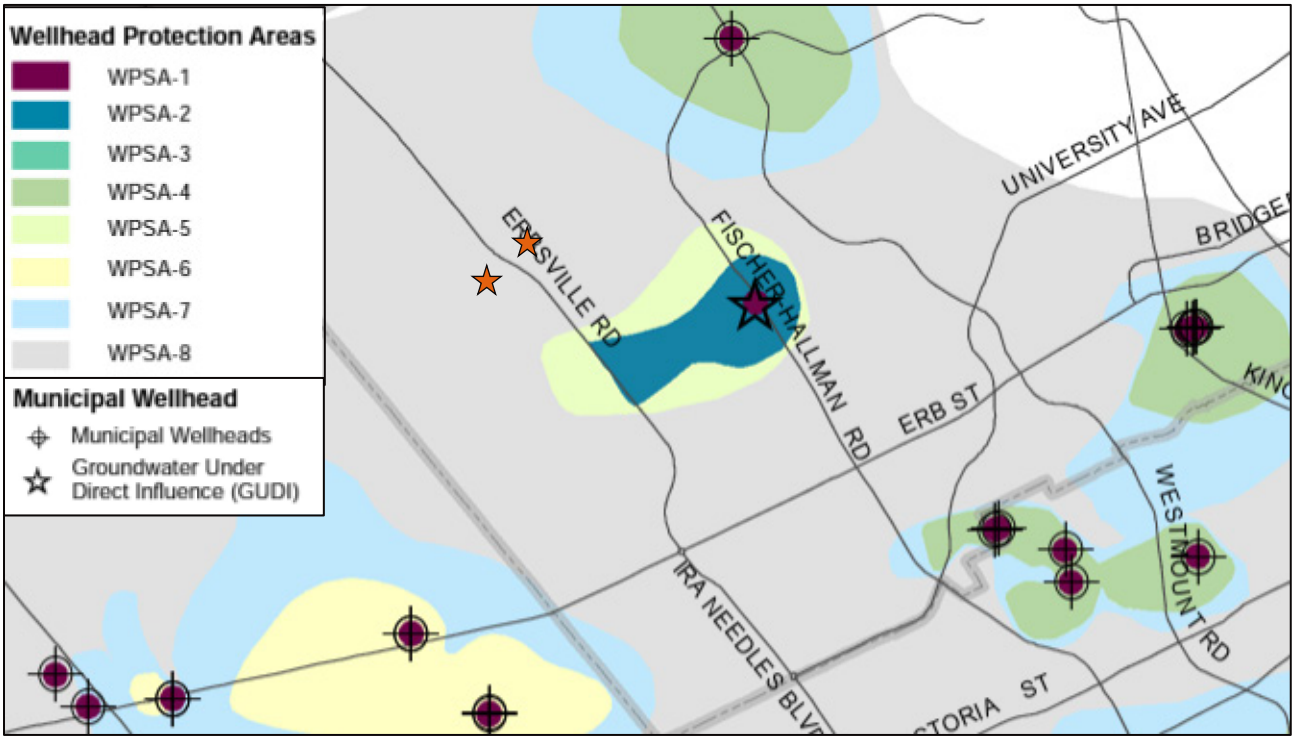


Figure 6-2 *Region of Waterloo Official Plan, Map 6a - Urban Area Source Water Protection Areas, with Subject Lands identified with orange stars*

6.4 City of Waterloo Official Plan

The City of Waterloo Official Plan was adopted by Municipal Council in 2012 and sets out the policies that direct growth and change until 2031. The City of Waterloo Official Plan established a policy framework to guide public and private sector decisions relating to development and the provision of community infrastructure and services. The local Official Plan also sets out the intentions of City Council relating to future economic, social and land use changes to the year 2031. OPA 58 was adopted by Council on December 9, 2024, representing Phase 1 of the municipal comprehensive review of the Official Plan, and is currently before the Minister for a decision.

Table 6-5 summarizes the applicable designations of the subject property based on the City of Waterloo Official Plan Schedules with revisions to designations through OPA 58 identified in brackets. The following subsections of this Report discuss the policies for those associated designations that are relevant to the proposed Zoning By-Law Amendment applications.

Table 6-5 *City of Waterloo Official Plan Schedules and Designations of Subject Property (OPA 58 in brackets)*

Official Plan Schedules	Designation of Subdivision A	Designation of Subdivision B
Schedule 'A' Land Use Plan	Low Density Residential *(Low Rise Residential)*	Low Density Residential and Open Space *(Open Space)*
Schedule 'A4' Natural System	N/A	Core Natural Features, Supporting Natural Features
Schedule 'B' City Structure	Urban Area	Urban Area
Schedule 'B1' Height and Density	Low Density, 10 metres *(Low Rise, 4 storeys)*	Low Density, 10 metres *(Low Rise, 4 storeys)*
Schedule 'B3' Designated Greenfield Areas	Built Up Area	Built Up Area
Schedule 'B4' Source Water Protection Areas	WPSA-8	WPSA-8
Schedule 'C' District Boundaries	Columbia Hills	Columbia Hills
Schedule 'E' Road Classification System	Regional Arterial (Erbsville Rd)	Regional Arterial (Erbsville Rd)
Schedule 'F' Active Transportation Framework	City-Wide Cycling and Multi-Use Routes (Blue Beech Park to Royal Fern Park)	N/A

6.4.1 Land Use Designation

On Schedule 'A' of the City of Waterloo Official Plan, Subdivision A is designated Low Density Residential while Subdivision B is designated Open Space, with a portion containing the existing single detached building as well as an erroneous area toward the southeast corner designated Low Density Residential.

Please see **Figure 6-3** for details, including an inset from OPA 58 that corrected the mapping error in the southeast corner designated Open Space instead of Residential.

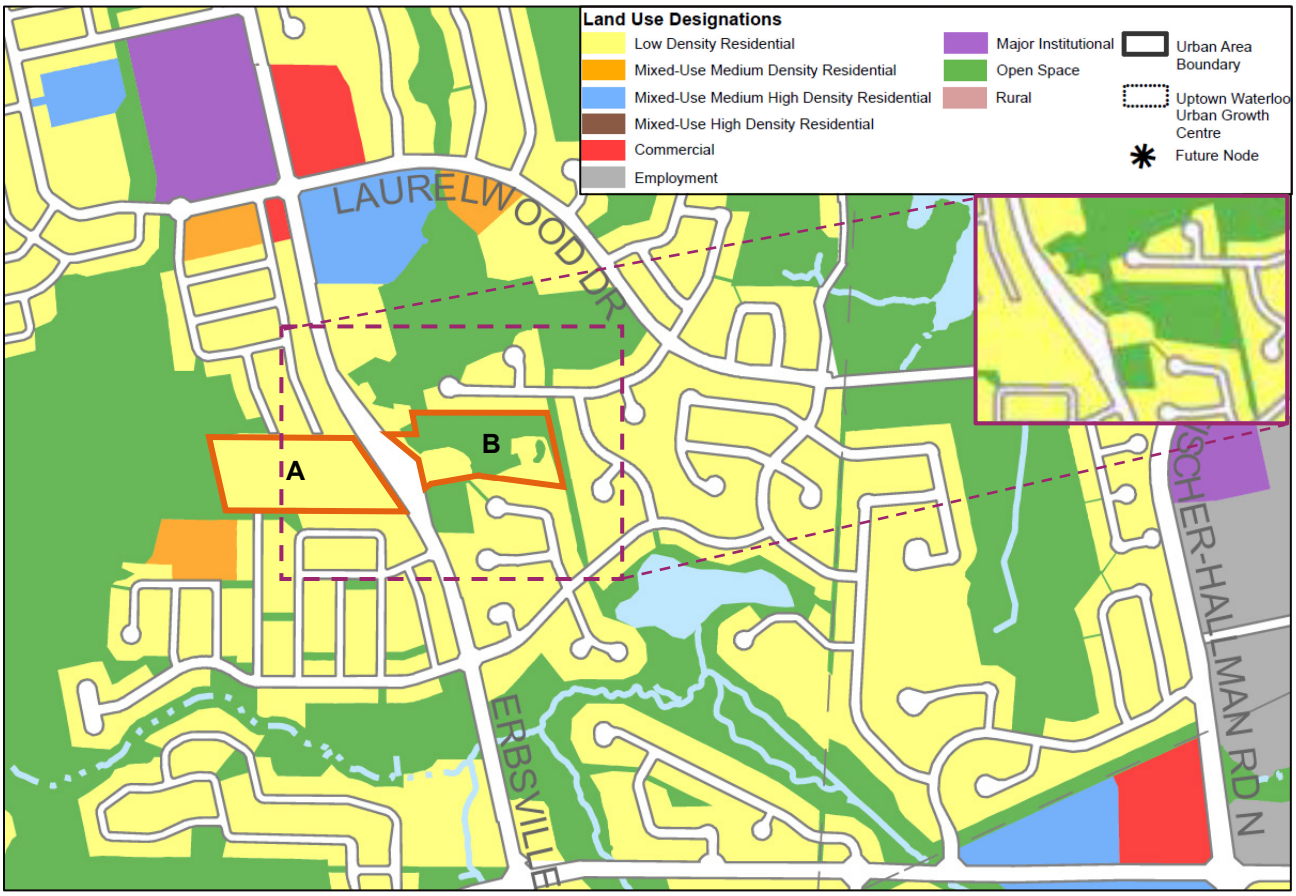


Figure 6-3 *City of Waterloo Official Plan Schedule 'A' Land Use Plan, with the Subdivisions A and B identified by letter and outlined in orange; OPA 58 correcting amendment is shown in violet outlined inset*

Further, Schedule ‘B’ of the City of Waterloo Official Plan identifies the Subject Lands as within the Urban Area with Schedule ‘B1’ providing that the Subject Lands are ‘Low Density, 10 metres’, which OPA 58 amends to ‘Low Density, 4 storeys’. Please see **Figure 6-4** for Schedule ‘B1’.

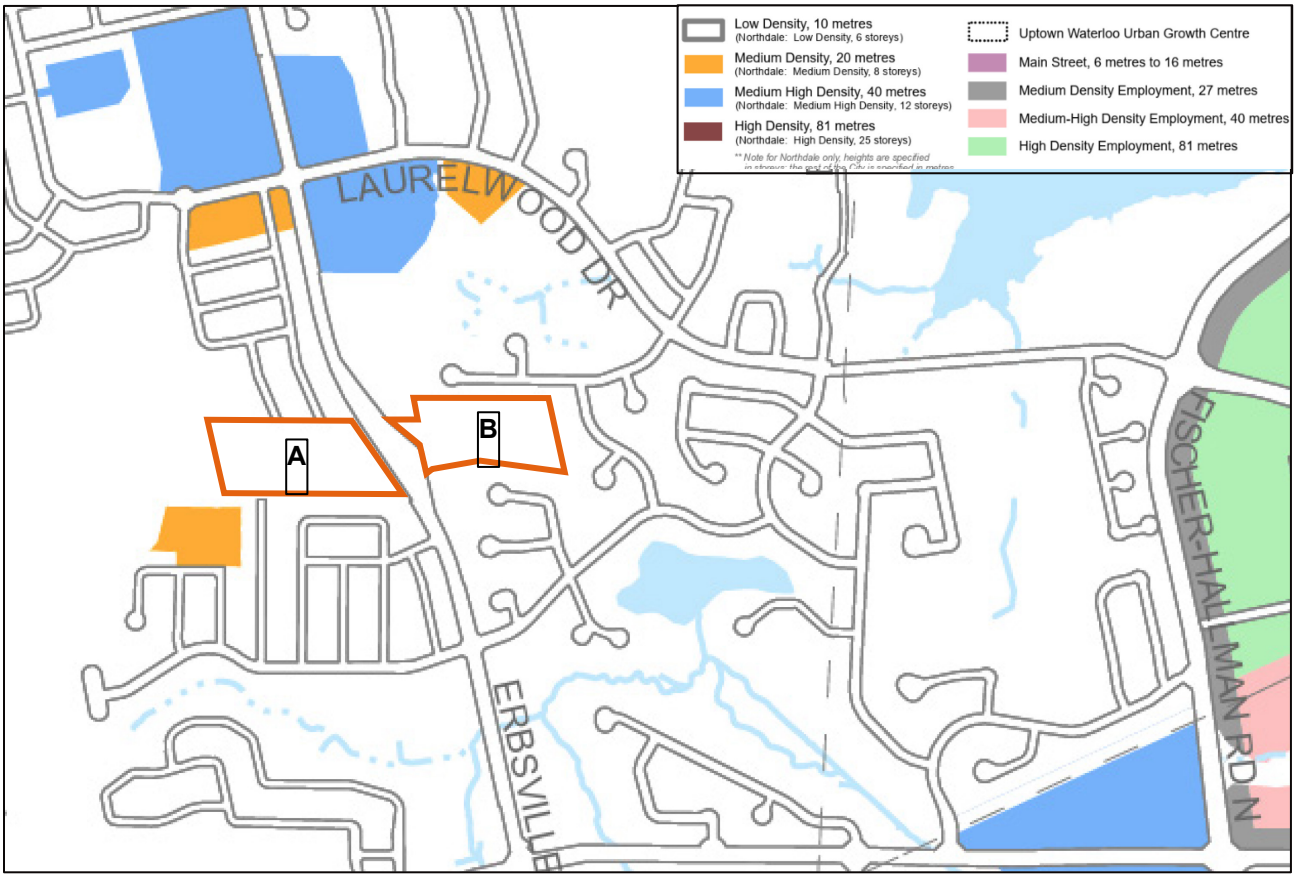


Figure 6-4 *City of Waterloo Official Plan Schedule 'B1' Height and Density, with the Subdivisions A and B identified by letter and outlined in orange*

6.4.1.1 Low Density Residential

As outlined in Section 10.1.3 of the Official Plan, the intent of the Low Density Residential designation is “to accommodate primarily low-rise residential land uses at lower densities than the rest of the City” with intensification to be “context sensitive to the surrounding neighbourhood and maintain a low-rise built form.”

Section 10.1.3 (1) provides that residential building types may include single- and semi-detached dwellings, duplex and triplex dwellings, and townhouses while “(unique) sites may also be zoned to permit terrace dwellings and or apartment units.” Section 10.1.3 (3) further provides a maximum net residential density of 150 bedrooms per hectare and 10 metres, except where a Zoning By-law Amendment is requested to permit terrace dwellings and/or apartments. The current criteria to permit such dwellings is reviewed in **Table 6-6** with additional review with respect to changes in OPA 58 following the table.

Table 6-6 *Criteria to permit Terrace Dwellings and/or Apartments*

Policy	Discussion of Conformity
10.1.3 (8) A Zoning By-law Amendment to permit terrace dwellings and or apartments shall comply with the following criteria:	
(a) The property is not located within a Heritage Conservation District;	Conforms.
(b) Terrace dwellings and or apartments represent an appropriate and desirable land use for the neighbourhood;	The addition of terrace dwellings will support a broader range of housing types in the neighbourhood, consistent with the PPS and ROP. *Note: criteria removed by OPA 58.*
(c) Terrace dwellings and or apartments will not destabilize the neighbourhood;	The proposed development will contribute more attainable forms of housing within the neighbourhood, stabilizing access to the neighbourhood for a range of household incomes. *Note: criteria removed by OPA 58.*
(d) The proposal will achieve a high standard of urban design, with emphasis on: i. Site and building design that complement and enhance the surrounding neighbourhood character; ii. Landscape design that creates visual interest, 'green' the site, and buffer; and, iii. Prominent entrances that emphasize the streetscape;	Multi-unit residential blocks will be subject to Site Plan Control. Conceptual designs provide prominent entrances that address the streetscape and complements the built form of the neighbourhood while providing significant area for landscape, including green areas to enhance the tree canopy. *Note: 'character' removed by OPA 58*
(e) Sufficient infrastructure exists to service the site;	Complies. See Functional Servicing Report for details.
(f) The development capacity of the site is not exceeded, and the proposal does not require significant relief from standard regulations;	Net residential densities up to 150 bedrooms per hectare provided. Block 6 requires no relief from regulations. Block 5 requires minor relief from setback abutting the Park Block, assisting in providing passive surveillance, and from a pinch-point to the adjacent low-rise residential uses.
(g) The development maintains the land use intensity of the surrounding low density residential neighbourhood;	Net residential densities up to 150 bedrooms per hectare are provided, consistent with permitted intensity of surrounding neighbourhood. *Note: criteria removed by OPA 58.*

Policy	Discussion of Conformity
(h) The development results in context-sensitive intensification in the low density residential neighbourhood and,	Complies. Location of multi-unit residential blocks are buffered from existing neighbourhood by parks and trails (Block 5) or by significant grade differences and setbacks significantly exceeding minimums (Block 6).
(i) The proposal complies with other criteria that may be deemed appropriate by the City based on the context of the site.	Visitable housing is challenging to provide in terrace dwellings. Note that the conceptual design provides more attainable homes for households with children on the lower level (3-bedroom units). *Note: Visitable housing preference added by OPA 58.*
10.1.3 (9) In addition to policy 10.1.3 (8) above, applications to amend the Zoning By-Law to permit terrace dwellings and or apartments will be reviewed within the context of the locational criteria deemed appropriate by the City including the following criteria:	
(a) The property is located on the periphery of a low density residential neighbourhood, or is adjacent to a school site;	Complies as the Blocks are on the periphery of the existing low density residential neighbourhoods.
(b) The property abuts a designated Node or Corridor, and buffers other properties designated Low Density Residential from properties within the designated Node or Corridor	Block 5 is in close proximity to a Medium Density site (Columbia Forest LTC), which is not part of or located within a Node or Corridor. Block 5 is also buffered from existing Low Density Residential uses by Open Space uses. Block 6 provides significant setbacks to existing uses. *Note: criteria removed by OPA 58.*
(c) The property has direct vehicular access onto an arterial or major collector road.	Block 6 provides direct vehicular access onto a Regional Arterial Road. The Transportation Impact Study, prepared by Paradigm, concluded that the existing transportation network would continue to operate at acceptable levels of service and within capacity with no specific problem movements and no queue impact issues upon development of the proposed development, including Blocks 5 and 6. *Note: criteria removed by OPA 58.*

In addition to the OPA 58 revisions noted above, Section 10.1.3(9) revised the location criteria from “and” to “or” and included the following:

(b) The property is located within a Major Transit Station Area as identified on Schedule ‘B; or,
(c) The property is in close proximity to a school site or other *community uses*; or,
(d) The property is in close proximity to existing or planned transit; or,
(e) The property is in close proximity to commercial centres or neighbourhood shopping areas; or,
(f) Other locations as may be deemed appropriate by Council.

Blocks 5 and 6 are located within walking distance to school sites, a commercial centre, and existing transit.

Section 10.1.3 (11) limits the height of terrace dwellings to 10 metres and apartments up to 12 metres. OPA 58 removes this policy and replaces it with a new policy at Section 10.1.3 (10) permitting apartment buildings or equivalent forms to have a maximum height of 6 storeys without amendment to the Official Plan.

Further, and notwithstanding the existing Section 10.1.3(9), the in-effect City of Waterloo Zoning By-law provides for maximum building heights in the R8 and R9 zone of 13.5 metres for uses including terrace dwellings ("STACKED TOWNHOUSE BUILDING") having 4 units and apartments.

In our opinion, the proposed Zoning By-law Amendment requesting R5 and R9 zones in Subdivision A conforms to the policies in the Low Density Residential designation, and that the requested R9 zone conforms or maintains the general intent of the Official Plan policies, recognizing the context of the site and the in-force zoning permitting 13.5m building heights in all low-rise residential zones, except RC1.

6.4.1.2 Open Space

As outlined in Section 10.5 of the Official Plan, the intent of the Open Space designation is "to protect ecologically significant *natural features* and to provide a comprehensive and connected open space system that balances the needs of the community in terms of recreation/leisure, culture, transportation, *infrastructure* and environmental management. Infrastructure includes storm water management systems.

Section 10.5.2.5 (1) provides that lands within the Natural System on Schedule 'A4' include:

(a) Landscape Level Systems;
(b) Core Natural Features;
(c) Supporting Natural Features;
(d) *Fish habitat*
(e) Restoration Areas; and
(f) *Linkages.*

Policies with respect to the above uses are provided within the Environment and Energy Chapter.

In our opinion, and as discussed further in the next section, Subdivision B conforms with the Open Space policies of the City of Waterloo Official Plan.

Notwithstanding that no change in designation is proposed through this application, it is anticipated that the proposed expansion of Blue Beech Park and extension of the trial network within Subdivision A will result in the City redesignating those lands Parks and Other Green Spaces on Schedule 'A3' through Phase 2 of the Official Plan Review.

Section 10.5.2.1 (1) provides that the predominant use of lands designated Parks and Other Green Spaces includes "municipal parkland and trails as well as other open space areas such as hydro corridors, stormwater management facilities, conservation areas, environmental reserves, *natural features*, and buffers associated with *natural features*" which may or may not be privately owned. Based on the classifications under Section 10.5.2.1 (4) and Table 10-1, Blue Beech Park would continue to be a Local Park after the required 5% parkland contribution is added. The requirements under Table 10-1 provide that such a park serves residents within a 600-800m (15-20 minute walk) with a preferred street frontage of at least 40 metres and no greater than 50 metres.

Blue Beech Park is approximately 1 ha in size with approximately 34m of street frontage on White Birch Avenue. With the proposed expansion, the park will be 1.24 ha in size with approximately 58.5m of street frontage. All of

Blocks 1-5, 10-12 are within 125m. The driveway access for Block 6 is within 600m and the rear units within 800m via Erbsville Road and Blue Beech Boulevard.

In my opinion, the proposed parkland dedication complies with the Open Space policies of the City of Waterloo Official Plan, noting that the preferred street frontage deficiency for Blue Beech Park will be improved with associated grading providing better sight lines into the park given the steep grades.

6.4.2 Natural Heritage Policies

The City of Waterloo Official Plan includes a Natural Heritage System consisting of Landscape Level Systems (8.2.3), Core Natural Features and fish habitat (8.2.4), Supporting Natural Heritage Features (8.2.5), Restoration Areas (8.2.6), and Linkages (8.2.7).

Based on the Environmental Impact Studies,

- No development or site alteration is proposed within the identified landscape level features and no impacts to the regional recharge area is anticipated
- No development or site alteration is proposed within any core natural feature (i.e. Forested Hills ESPA to the west of Subdivision A; provincially significant wetland to the north of Subdivision B) with development of the subject lands adjacent to such features not resulting in adverse impacts to those features or their ecological functions with the implementation of recommended mitigation measures
- One Supporting “A” Natural Feature is present on Subdivision B, being a locally significant woodland (vegetative unit 2). Minor encroachment into the southeast corner of that feature for the construction of essential stormwater management infrastructure will have no adverse environmental impacts on that locally significant woodland or its ecological functions.
- Several Supporting “B” Natural Features are present on the Subject Lands. Four small anthropogenic “other wetlands” are proposed and permitted to be developed as the ecological functions will be maintained via the proposed stormwater management strategy (conveying water to downstream areas). One small wetland is a naturally occurring seepage area (environmentally significant discharge area) providing habitat for a regionally significant species (smooth-sheathed sedge), which is also proposed and permitted to be developed as the ecological functions will be similarly maintained, the discharge area does not support Core Natural Features or Supporting A Natural Features, and the regionally significant species is proposed to be transplanted to suitable habitat within the adjacent ESPA. Finally, no development or alteration is proposed within the one “other woodland” present within the site as well as the one “other woodland” abutting the site to the south.

Based on the policy review in the Environmental Impact Studies as summarized above as well as in Section 8.3 of this Report, the proposed development conforms to the Natural Heritage policies of the City of Waterloo’s Official Plan, subject to the identified mitigation and protection measures and that the proposed transplant of the regionally significant species is undertaken as proposed.

6.4.3 Urban Design Policies

Section 3.11 of the City of Waterloo Official Plan sets out urban design policies and implementation direction, which are intended to ensure growth and development achieves a high standard of urban design. The Urban Design Report, prepared by Arcadis and enclosed with this complete submission, provides a detailed overview of

the proposed redevelopment in relation to the Urban Design Guidelines policies and objectives outlined in Section 3.11.1 (General Urban Design Policies) of the Official Plan.

6.5 Columbia Hills District Plan

Subdivision A is located within the Columbia Hills District Implementation Plan on Schedule C of the Official Plan. The District Plan was approved in November 1996 and most recently was amended in February 2009. In general, the District Plan provides more detail with respect to the implementation of the Official Plan land use designations. Subdivision A lands are also identified as residential lands (Map 1) and subject to Environmental Constraint Level Two (Map 5). Excerpts from Maps 1, 2, and 3 are shown in **Figure 6-5** to assist in situating Subdivision A within the District.

The objectives of the District Plan include:

- Providing a range and mix of housing types with densities to support public transit,
- Developing around a modified rectilinear grid in the context of the topographic and natural environment, features to provide opportunities for connecting a multi-modal transportation system,
- Creating a public realm defined by buildings, public spaces, landscaping, sidewalks, and pathways, and
- Retaining and preserving open spaces, establishing linkages, and protecting environmentally important resources.

Residential policies in the District Plan (Section 6.2) provide for the development of neighbourhood enclaves with residential densities varying street-by-street and block-by-block with a targeted mix of 55% Low Density (singles/semis), 35% Medium Density (Townhouse), and 10% Medium-High & High Density (Apartments). Buildings rather than garages are to be prominently oriented toward the street, porches are encouraged, housing forms are to be compatible, and, where appropriate, may front onto Erbsville Road.

Response: *Subdivision A provides for 13% singles/semis and 87% multi-unit residential development (stacked townhouse dwellings in the concept plan). There are limited residential units in multi-unit residential forms within the overall District and particularly within Columbia Forest I. Where such housing forms are proposed, conceptual plans orient the buildings and associated patios and balconies toward the street with parking located to the rear.*

The Parkland policies of the District Plan (Section 6.6) generally direct that a parkette or neighbourhood park are to be provided with sufficient road frontage and accessibility, that the trail system physically links community points of interest and features, including the Mixed-Use Activity Node at Erbsville Road and Laurelwood Drive, parks, and open spaces, and that site-specific alignments of the trail system are to consider the overall West Side Trails Master Plan and site conditions.

Response: *Subdivision A proposes to increase the size of Blue Beech Park (a neighbourhood park) along with its frontage on a municipal street. The primary trail abutting the ESPA is proposed to be extended and connected through the lands, consistent with Map 3 of the plan, providing connections to parks, schools, and the mixed-use activity node. Site conditions (steep topography) prevent connections toward Erbsville Road.*

The Open Space policies of the District Plan (Section 6.7) related to designated areas with important environmental features and functions, buffer areas, floodplains, and areas necessary for servicing future development (e.g. stormwater management areas). The Plan provides that these need not be conveyed to the City but that they may be accepted by the City.

Response: *The ESPA lands and associated buffer are outside of Subdivision A, except for Block 8. These lands, including Block 8, shall be conveyed to the City.*

The Transportation policies of the District Plan (Section 6.8) direct that walkways and links facilitate continuous active transportation movement, focused on providing access to school sites, the mixed-use node, neighbourhood parks and parkettes, and other community facilities. The design of neighbourhood streets is to provide a modified grid pattern to maximize permeability and connectivity while reducing traffic speeds through limiting continuous length of streets, T intersections, and four way stops.

Response: *Subdivision A connects and completes the primary trail, providing access to schools, the mixed-use node, and the system of parks and parkettes within Columbia Forest I and II. The existing street network to the north diverges from the street pattern in Map 2 to provide for Blue Beech Park and omitted the connection to Erbsville Road given the challenging topography. The proposed road extensions are generally consistent with the street pattern in Map 2, with the exception that a possible community access route to/from Erbsville Road is not feasible due to topography. The proposed street pattern is otherwise consistent with the Transportation Policies, providing limited street lengths and terminating Wild Ginger Avenue at White Berch Avenue in a T-intersection and terminating White Berch Avenue at Royal Fern Street and the access to Block 5 in a T-intersection.*

The Public Transit policies in the District Plan provide a conceptual route through Columbia Forest I and II to link the neighbourhood enclaves.

Response: *The extension of the street network maintains the option for the transit routing contemplated in Map 1, subject to future determination of the Region of Waterloo.*

Servicing policies in the District Plan (Section 6.11) provide that municipal water and sewage connections are required and that stormwater management reflects the applicable sub-watershed studies, maintain infiltration/recharge rates, and may be permitted within watercourse and wetland buffers subject to certain restrictions. Groundwater Infiltration/Recharge Area policies (Section 6.16) provide further direction on infiltration and cut-and-fill operations.

Response: *Per the Functional Servicing Report and Stormwater Management Report, prepared by Stantec, the proposed development can be adequately serviced by municipal sewage, storm drainage, and water services. The downstream Laurelwood Basin D was designed to accommodate the drainage area of the subject lands. Lot-level infiltration galleries and a clean water collection system are further proposed.*

Woodland Policies in the District Plan (Section 6.12) require protection from adjacent development impacts through naturalized vegetation buffers and municipal ownership of Environmental Constraint Level One woodlands, wetlands, and associated buffers.

Response: *Appropriate naturalized vegetation buffers are provided to the Forested Hills ESPA, which are to be transferred to municipal ownership. See the Arborist Report for details of the ecological restoration plan and the Environmental Impact Study for a detailed review.*

Environmental Policies in the District Plan (Section 6.13) provide specific direction in the Environmental Constraint Level One and Two areas. For the latter, development may be permitted provided existing (pre-development) ecological functions and processes are protected and maintained during and after construction, with buffers determined on a site-specific basis.

Response: *The Environmental Impact Studies, Hydrogeological Study, and Preliminary Stormwater Management Report confirm that pre-development ecological functions and processes are protected and maintained with appropriate buffers during and after construction, with specific mitigation and protection measures identified.*

Urban Design Principles in the District Plan (Section 7) provide direction around high-quality urban design for review of draft plan of subdivision and site plan applications.

Response: *Please see the submitted Urban Design Brief for a detailed review of the applicable policies.*

In our opinion, the proposed development has appropriate regard for the policies of the District Plan.

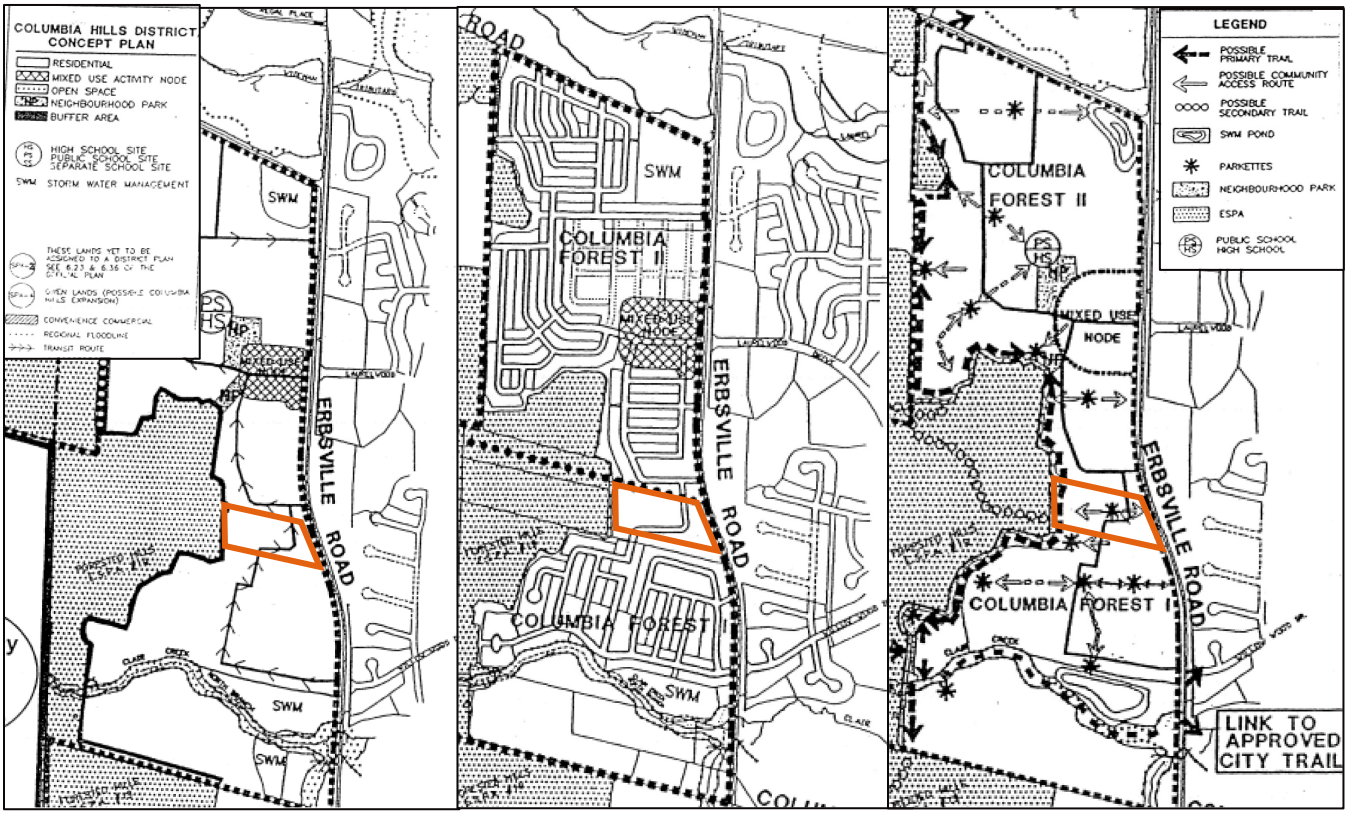


Figure 6-5 *Columbia Hills District Plan Map 1 (District Concept Plan), Map 2 (Possible Local Street Pattern & Block Layout Concept), and Map 3 (Possible Parks, Parkettes, Open Space & Community Trail Concept) with Subdivision A outlined in orange*

6.6 City of Waterloo Zoning By-Law 2018-050

Subdivision A is zoned 'Future Determination (FD) Zone' and Subdivision B is zoned 'Conservation (OS3) Zone' with site-specific exception C67 in Zoning By-Law 2018-050 (see **Figure 6-6**).

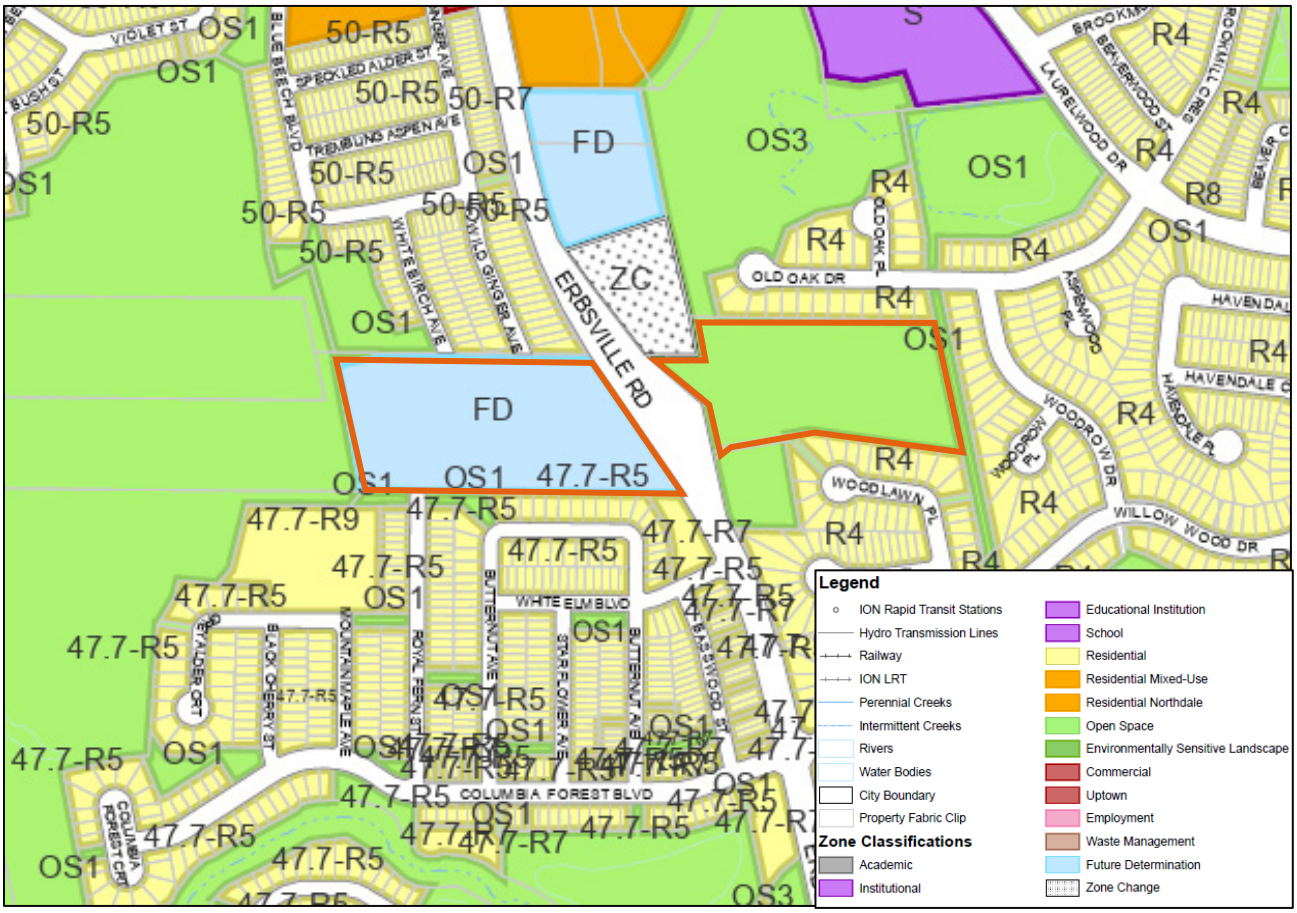


Figure 6-6 *City of Waterloo Zoning By-Law 2018-050 Schedule 'A', with Subdivision A outlined in orange on the left and Subdivision B outlined in orange on the right*

6.6.1 Subdivision B

The OS3 zone restricts uses to beekeeping, conservation lands, flood and erosion control, parkland, trails, and pathways, and restorative, scientific, and educational uses. Site-specific exception C67 permits one single detached building, existing large and small accessory structures, and private driveways as identified in Image A (see **Figure 6-7**). Remaining lands are limited to naturalized areas for the growth of trees, shrubs, grasses, or other vegetation.

Section 3.S.6.1 of the Zoning By-Law further provides that “A stormwater management facility shall be permitted in all zones except the Environmentally Sensitive Landscape Two (ESL2) Zone.”

Subdivision B proposes to remove the large and small accessory buildings as well as the portion of the driveway leading from the single detached building to the accessory buildings, while providing for a stormwater management facility and associated access that may be used for public trail connections to the Old Oak trail abutting the rear of the lands. An ecological enhancement plan is further proposed on these lands.

Based on the above, Subdivision B conforms to the Zoning By-law. As no changes to site-specific exception C67 are required to advance Subdivision B, the city may advance its own amendment to site-specific exception C67 in

the future to align with Subdivision B as part of a general housekeeping by-law update or a more substantial update to implement OPA 58.

Image A: 500 Erbsville Road

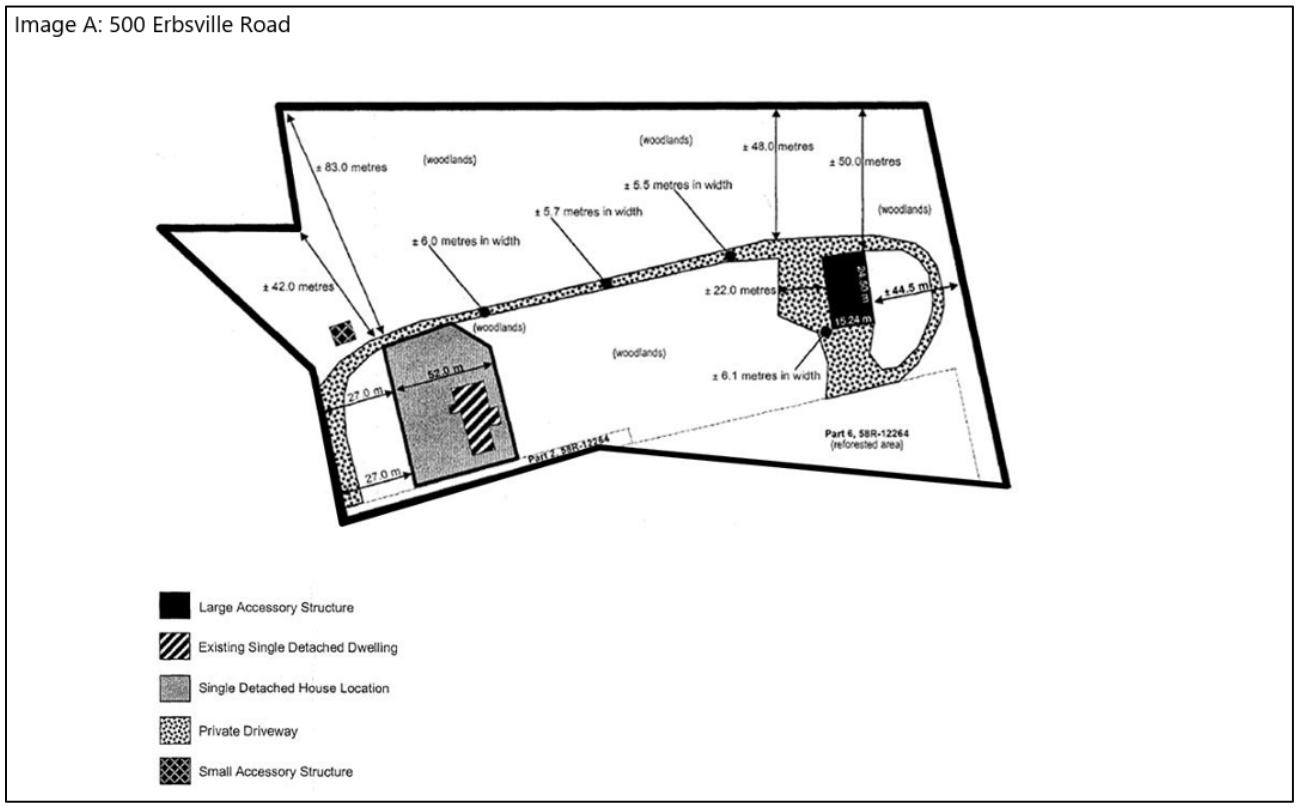


Figure 6-7 *City of Waterloo Zoning By-Law 2018-050 Site-Specific Exception C67*

6.6.2 Subdivision A

The FD zone was applied to lands where redevelopment requiring at least Zoning By-law Amendments were anticipated while permitting existing uses, buildings, and structures that actually and legally existed to continue.

This application requests specific zone categories apply to Subdivision A lands as outlined in **Table 5-1**, shown in **Figure 6-8**, and summarized as follows:

- Residential Five (R5) Zone (Blocks 1-4, 10-12)
- Residential Nine (R9) Zone (Block 5) with site-specific exceptions:
    - Permit MULTI-UNIT RESIDENTIAL BUILDING and apply regulations for APARTMENT BUILDING in R9 to MULTI-UNIT RESIDENTIAL BUILDING
    - Permit a 6.0 m rear yard setback (to BLK 7)
    - Permit a 6.0 m LOW RISE RESIDENTIAL LOT LINE setback (to BLK 4)
- Residential Nine (R9) Zone (Block 6) with site-specific exception:
    - Permit MULTI-UNIT RESIDENTIAL BUILDING and apply regulations for APARTMENT BUILDING in R9 to MULTI-UNIT RESIDENTIAL BUILDING
- Parks & Recreation (OS1) Zone (Blocks 7 and 9)
- Conservation (OS3) Zone (Block 8)



***Figure 6-8** Proposed Zoning of Subdivision A*

Table 6-7 reviews the zoning compliance for the proposed R5 Zone. **Table 6-8** reviews the zoning compliance for the proposed R9 Zone on the basis that the apartment regulations will be applied to the proposed multi-unit residential development, with further site-specific exceptions indicated in bold orange.

Block 6 as proposed meets the definition of THROUGH LOT with both Erbsville Road and Wild Ginger Avenue identified as FRONT LOT LINES. The remaining lot lines are understood to be deemed REAR LOT LINES, INTERIOR LOT LINES, and LOW RISE RESIDENTIAL LOT LINES.

***Table 6-7** Zoning By-Law Compliance for Blocks 1-4, 10-12 (Proposed R5 Zone)*

Regulation	Required (R5)		Concept Plan (Block 1-4, 10-12)
PERMITTED PRIMARY USES	DETACHED BUILDING	FREEHOLD SEMI-DETACHED BUILDING	DETACHED BUILDINGS
LOT AREA (min)	INTERIOR LOT: 255 m^2 CORNER LOT: 330 m^2	225 m^2 252 m^2	277 m^2 – 598 m^2 359 m^2 – 604 m^2
LOT FRONTAGE (min)	INTERIOR LOT: 8.5 m CORNER LOT 11.0 m	7.5 m 8.4 m	9.1 m – 12.4 m 11.3 m – 16.4 m
Average LOT DEPTH (min)	30.0 m	30.0 m	30.0 m – 35.0 m
FRONT YARD setback (min)	6.0 m	6.0 m	Complies
FLANKAGE YARD setback (min)	3.0 m	3.0 m	Complies
SIDE YARD setback (min)	1.2 m	1.2 m and 0.0m	Complies
REAR YARD setback (min)	7.5 m	7.5 m	Complies
BUILDING HEIGHT	13.5 m for BUILDING containing 4 DWELLING UNITS, flat roof if over 10m 10m (otherwise)	13.5 m for BUILDING containing 4 DWELLING UNITS, flat roof if over 10m 10m (otherwise)	Complies
IMPERVIOUS COVERAGE (max)	Per 3.I.1	Per 3.I.1	Regulation to be confirmed through circulation/review.
LOT COVERAGE, all BUILDINGS (max)	45%	45%	Complies
PARKING SPACES (min)	1 Unit: 1 Space 2 or 3 Units: 2 Spaces 4 Units: 3 Spaces	1 Unit: 1 Space 2 or 3 Units: 2 Spaces 4 Units: 3 Spaces	Complies
Number of DWELLING UNITS	4	4	Complies
ATTACHED PRIVATE GARAGE and DRIVEWAY	55% of FRONT BUILDING FAÇADE LENGTH (max)	55% of FRONT BUILDING FAÇADE LENGTH (max)	Complies

***Table 6-8** Zoning By-Law Compliance for Blocks 5 and 6 (Proposed R9 Zone)*

Regulation	Required (R8)	Required (R9)	Concept Plan (Block 5)	Concept Plan (Block 6)
PERMITTED PRIMARY USES	STACKED TOWNHOUSE BUILDING	APARTMENT BUILDING	MULTI-UNIT RESIDENTIAL BUILDING	MULTI-UNIT RESIDENTIAL BUILDING
STREET LINE setback (min)	6 m	5 m	6.0 m	9.0 m (Erbsville) 22.6 m (Wild Ginger)
SIDE YARD setback (min)	1.8 m	3.0 m	4.2 m (S, OS1) 6.2 m - 7.5 m (E, R5)	N/A
REAR YARD setback (min)	7.5 m	7.5 m	**6.0 m** (N, OS1) 18.7 m (W, OS1)	34.2 m (N, R5) 33.7 m (W, R5) 7.8 m (S, R5)
LOW RISE RESIDENTIAL LOT LINE setback (min)	N/A	7.5 m	**6.2 m** – 7.5 m (E, R5)	34.2 m (N, R5) 33.7 m (W, R5) 7.8 m (S, R5)
BUILDING HEIGHT	13.5 m for BUILDING containing 4 DWELLING UNITS, flat roof if over 10m 10m (otherwise)	13.5 m No restrictions on roof type	11.7 m Hip roofline with gables (13.1 m to top of roof)	11.7 m Hip roofline with gables (13.1 m to top of roof)
Density (max)	150 BEDROOMS per ha	150 BEDROOMS per ha	148 BEDROOMS/ha (56 units, 126 beds)	115 BEDROOMS/ha (96 units, 216 beds)
LOT COVERAGE (max)	45%	N/A	23%	18%
LANDSCAPED OPEN SPACE (min)	30%	30%	45%	57%
AMENITY AREA (min)	N/A	3 m^2 for 1st BEDROOM plus 2 m^2 for each additional	+/- 3.7 m^2 per BEDROOM (balconies, terraces)	+/- 3.7 m^2 per BEDROOM (balconies, terraces)

Regulation	Required (R8)	Required (R9)	Concept Plan (Block 5)	Concept Plan (Block 6)
		BEDROOM in the UNIT 30% as common in BUILDINGS with 50 BEDROOMS or more		
Number of main BUILDINGS per LOT (max)	More than one permitted	More than one permitted	3	5
PARKING SPACES (min)	1 residential plus 0.10 visitor per DWELLING UNIT	1.15 residential plus 0.10 visitor per DWELLING UNIT	1.25 / unit (70)	1.25 / unit (120)

6.6.3 Multi-Unit Residential Buildings as Apartments

The concept plans supplied to satisfy the City's complete application requirements are for a housing form that meets both the City's definition for STACKED TOWNHOUSE BUILDING and MULTI-UNIT RESIDENTIAL BUILDING in the Zoning By-law.

The applicant has previously received Zoning By-law Amendment approval from the City to develop this exact housing form abutting the Columbia Hills District at 142 Foamflower Place and 246 Raspberry Place. The approved site-specific exception C242 provides the following:

(a) Notwithstanding anything to the contrary, the following additional USE shall be permitted:
    i. MULTI-UNIT RESIDENTIAL BUILDING
(b) Notwithstanding anything to the contrary, the regulations for APARTMENT BUILDING as outlined in the Residential Nine (R9) zone shall apply to a MULTI-UNIT RESIDENTIAL BUILDING.

That site context is similar to the proposed context in that the multi-unit residential buildings were proposed within a Low Density Residential area, located behind single detached and townhouse buildings, and with access to an arterial road through local roads.

At the time of approval of C242, the maximum height of an apartment building was 12 m without a requirement for a flat roof, with the under-construction building providing a height of 13.1 m to the top of a hip roof with gables. Current City Zoning permits building heights of 13.5 m (flat roof if above 10m) for all types of low-rise buildings with 4 units, and 13.5 m (non-flat roofs permitted) for apartment buildings.

Finally, the regulations for apartment buildings under the R9 zone provide for greater setbacks from adjacent lands, as well as minimum amenity area requirements.

In our opinion, applying the apartment building zone regulations to the proposed multi-unit residential buildings in the conceptual plan is appropriate in the context of Subdivision A.

6.6.4 Rear Yard Setback

The intent of the rear yard setback is to provide sufficient area for outdoor amenity areas, landscaped open space, and drainage while maintaining sufficient separation between adjacent uses to facilitate privacy and minimize overlook.

The proposed rear yard in the conceptual plan abuts the expanded parkland where overlook provides passive surveillance. The location is also driven by requirements to provide sufficient space for emergency vehicle turnaround and required parking. Private outdoor amenity area is provided through balconies and potentially at grade patios with sufficient landscaped open space provided across the balance of Block 5. The Stormwater Management Brief further demonstrates that sufficient area is available to maintain the required drainage. In our opinion, the proposed conceptual plan achieves the intent of the Zoning By-Law.

6.6.5 Low Rise Residential Setback

The intent of the low-rise residential setback is to facilitate compatibility and transition between low-rise and more intensive uses. The proposed locations of multi-unit residential buildings on the conceptual plan in Block 5 generally maintain the required low-rise residential setback except at one corner of the northerly building due to the triangular nature of the Blocks in this location where the current concept shows a 6.2 m setback. The request for a 6.0 m setback provides flexibility through detailed design ahead of a Site Plan application for Block 5. Appropriate landscape screening can also be included through a future Site Plan Application to mitigate the limited minor intrusion into the required setback. Overall, and in our opinion, the proposed conceptual plan achieves the intent of the Zoning By-Law.

7 Planning Rationale

This section of the Planning Justification Report summarizes the planning justification in support of the proposed combined Official Plan Amendment and Zoning By-Law Amendment application.

7.1 Alignment with Overarching Planning Framework

Based on the analysis provided in Section 6 of this Report, it is our opinion that the proposed redevelopment demonstrates regard for the “Matters of Provincial Interest” set out by the Planning Act and is consistent with the PPS. It is also our opinion that the proposed development conforms to the Region of Waterloo Official Plan and the City of Waterloo Official Plan, while also conforming to the revised policies of OPA 58.

The proposed redevelopment within a settlement area provides an appropriate and diverse range and mix of housing options and densities in a compact built form that efficiently use land and infrastructure while supporting the use of active transportation and enhancing multi-modal connectivity.

7.2 Compatible and Context-Appropriate Intensification

The Subject Lands are located within the existing built-up area where provincial and local policy directs new residential growth to support the efficient use of land, resources, and infrastructure. Subdivision A is also an

underutilized parcel within the Columbia Hills District where its planned function is to connect the existing neighbourhoods to the north and south with appropriate housing development.

It is our opinion that the proposed development is consistent with the planned function of the neighbourhood and represents compatible, context-sensitive intensification.

The proposed residential development abutting the local roads is consistent with the existing housing forms to the north and south, while the proposed low-rise multiple residential developments either front onto the arterial road at a lower elevation than existing residential uses or are buffered from existing residential uses by open space uses and with appropriate setbacks.

7.3 Complete Communities

The proposed redevelopment within the Columbia Hills District on an underutilized property completes and connects the community through the extension and connection of the existing transportation systems, including for vehicles, pedestrians, and cyclists, as well as the expansion of the local park. The additional provision of housing options within the neighbourhood, including more attainable forms of housing, are also within walking distance to schools and the mixed-use node, allowing many daily needs of future residents to be met without the need to use a personal vehicle.

7.4 Range and Mix of Housing

The proposed development is anticipated to provide approximately 175 residential units, with 23 single detached buildings and 152 units in multi-unit residential buildings within walking, cycling, and rolling distance to schools, parks, and a mixed-use node with grocery and other important retail uses.

The additional residential units will provide critical new residential housing units in the City of Waterloo, contributing to the City's 83% intensification target and responding to the need for additional housing in a range of housing types, including in a multi-unit residential building form that is more attainable than the single detached buildings that predominate the neighbourhood.

7.5 Efficient Use of Infrastructure and Municipal Services

As demonstrated in the Functional Servicing Report, the proposed development will extend and connect to full municipal services and can be adequately serviced via municipal sewage, storm drainage, and water services, while the downstream Laurelwood Basin D was designed to accommodate the drainage area of the subject lands, providing an efficient use of existing municipal infrastructure.

The subject property is also located within walking, cycling, and rolling distance of a range of uses while completing an existing community through the extension and connection of the neighbourhood's transportation system in proximity to a number of existing public transit stops. In our opinion, the proposed development makes efficient use of existing transportation infrastructure, including active transportation and public transit.

7.6 Protection of Ecological Systems

As demonstrated in the Environmental Impact Studies and Stormwater Management Report, the proposed development will retain core natural features (i.e. Forested Hills ESPA) with appropriate development setbacks and public ownership, maintain the water balance, provide ecological enhancement, and maintain the functions of the existing supporting natural features while transplanting the regionally rare smooth-sheathed sedge to a suitable habitat in the adjacent ESPA.

8 Supporting Studies

As part of the complete application for the proposed Official Plan Amendment and Zoning By-Law Amendment, several supporting studies have been prepared and submitted for City and Agency review based on the pre-submission consultation record dated April 1, 2023, and which are summarized in the following subsections.

8.1 Urban Design Brief

The Urban Design Brief, prepared by Arcadis, concludes that the proposed development conforms to the policies of the Official Plan and has regard for the applicable policies of the Columbia Hills District Implementation Plan and Urban Design Manual.

The Brief further acknowledges that a revised Urban Design Brief may be required as part of future Site Plan Applications for Blocks 5 and 6 scoped to the multi-unit residential buildings proposed and reflecting detailed design plans not yet available at this stage of approval.

8.2 Energy Study

The Energy Study, prepared by Building Knowledge Canada Inc., indicates the net zero-ready detached residential uses would provide 50% energy reduction and 72% operational carbon reduction compared to a baseline building with Energy Star performance providing a 17% operational carbon reduction. Options are provided for multi-unit residential uses that may provide between 9-50% energy reduction and 16-83% operational carbon reduction compared to a baseline building.

The proposed residential buildings may be developed as Net-Zero-Ready, subject to market conditions, consistent with previous Activa residential projects. The recommendations for multi-unit residential uses will be further considered through detailed design at the building permit stage.

8.3 Environmental Impact Studies

The Scoped Environmental Impact Studies, prepared by WSP, characterized existing natural features, reviewed applicable natural heritage policies, integrated technical information (e.g. Hydrogeology, Stormwater Management, Grading Plans, Erosion & Sediment Control Plans), assessed impacts, and recommended mitigation and enhancement measures.

In Subdivision A, the EIS identified the ESPA as a core environmental feature. Vegetative units 1 and 5 are identified as ‘other wetlands’ (Supporting “B” Natural Feature), one of which (vegetative unit 5) is a naturally

occurring seepage area containing a regionally rare sedge. Development of vegetative unit 1 is permitted in accordance with City OP Policy 8.2.5(19) as it does not have any of the regulated attributes. Development of vegetative unit 5 is permitted in accordance with City OP Policies 8.2.5(18) and (19) as it does not support Core Natural Features or Supporting “A” Natural Features and the ecological functions will be maintained through the stormwater management strategy. Based on GRCA policies, these wetlands can be removed to facilitate development as they are not within a floodplain or watercourse and there will be no adverse impacts on flooding or erosion. The recommended mitigation and protection measures included the following:

- Retain the ESPA (Core Natural Feature, Significant Woodland) in full and apply a 10m development setback, as incorporated into the proposed development plans
- Prepare a buffer enhancement plan, as incorporated into the Arborist Report
- Implement the preliminary stormwater management strategy to maintain hydrogeologic inputs (water balance), treat runoff, and mitigate potential erosion impacts, and
- Transplant the regionally rare smooth-sheathed sedge to a suitable habitat in the adjacent ESPA

In Subdivision B, the EIS identified no core environmental features. Vegetative unit 2 meets the criteria of a locally significant woodland (Supporting “A” Natural Feature), while vegetative units 3 and 12 meet the criteria of “other woodlands” (Supporting “B” Natural Feature). In addition, regulated anthropogenic wetlands (vegetative units 5, 8, and 11) meet the criteria of “other wetlands” (Supporting “B” Natural Feature). Based on City policies, anthropogenic wetlands can be modified or developed to facilitate the construction of the stormwater management facility as the ecological functions will be maintained through the stormwater management strategy. Based on GRCA policies, these wetlands can be removed to facilitate development as they are not within a floodplain or watercourse and there will be no adverse impacts on flooding or erosion. The proposed minimal encroachment into vegetative unit 2 is permitted in accordance with City policy 8.2.5(3)(c) as the stormwater management facility is “essential infrastructure for which no other alternative is feasible and where crossings and the area of disturbance will be minimized.” The recommended mitigation and protection measures included the following:

- Retain vegetative units 2 and 3 with a 10m development setback, permitting minimal encroachment at the edge of vegetative unit 2 for the stormwater management facility and trail installation
- Prepare an ecological enhancement plan to protect the edge of retained features, as incorporated into the Arborist Report
- Implement the preliminary stormwater management strategy to maintain hydrogeologic inputs (water balance), treat runoff, and mitigate potential erosion impacts, and
- Mitigate occupancy-related activities through permanent fencing and sensitive features signage at the development limits, as incorporated into the Arborist Report.

Additional recommendations related to vegetation management, timing of removals and grading, invasive species control, and best management practices during construction have been identified.

8.4 Functional Servicing Report

The Functional Servicing Report, prepared by Stantec, proposes that the development of the Subject Lands, particularly ‘Subdivision A, can be adequately serviced by municipal sewage, storm drainage, water services, and utilities, with details summarized as follows:

- Sanitary services will be extended from the existing 200 mm sanitary sewer on Wild Ginger to service the “upper subdivision”, while the existing 200 mm sanitary sewer on Woodlawn Place will be extended to service the “lower subdivision”
- Water services will be extended from the 200 mm watermains on White Birch Avenue and Royal Fern Street and the 150 mm watermain on Wild Ginger Avenue to serve the upper subdivision, while the “lower subdivision” will be serviced from the existing 300 mm watermain on the east side of Erbsville Road
- Required fire flows will be provided by on-site hydrants
- Storm servicing will be provided through new storm sewers draining to a common point at the Erbsville Road access of the “lower subdivision” and crossing to Subdivision B to the proposed stormwater management facility before outletting to the Laurelwood Area V storm network
- As there is no existing major overland route connecting the Subdivision B lands to the existing Laurelwood Area V subdivision, regrading the Old Oak Trail lands will convey the regional storm event to Old Oak Drive as confirmed through consultation with City of Waterloo Engineering Services.

8.5 Hydrogeological Report

The Hydrogeological Report, prepared by Stantec Consulting Ltd., assessed baseline groundwater conditions and evaluated how the form and/or function of the hydrogeological system could be affected by the proposed residential development and recommended potential mitigation measures to be employed to maintain pre-development groundwater functions under post-development conditions.

The study concluded:

- A perched groundwater system is present with groundwater levels dropping notably in elevation moving northeastward across the Subject Lands, with seasonal high groundwater levels ranging from less than 0.1 m below ground surface to 6.0 m across Subdivision A and from 0.2m to 5.2m across Subdivision B.
- Groundwater contours appear to mimic the prevailing topography with the inferred horizontal movement of groundwater through the subsurface flowing in an east to northeast direction. across the Subject Lands. This interpreted flow direction agrees with regional flow mapping, which suggests groundwater flow through the regional overburden aquifer is also to the east and northeast towards Laurel Creek.
- Within Subdivision A, a wet low-lying area, delineated in the EIS and postulated to be a groundwater seepage area, is present in the east-central portion of the property and is sustained by groundwater inputs originating from the perched groundwater system. The shallow marsh community (Vegetation Unit 1 in the EIS) located in the southeastern corner appears to be mostly sustained by overland flow / surface water drainage from most of the site and functions as an overall groundwater recharge feature.
- Within Subdivision B, wetland vegetation communities established along a man-made ditch (Vegetation Units 5, 8, and 11 in the EIS) appear to be sustained by surface water inputs originating from the existing Region of Waterloo stormwater management facility at the southwestern boundary of the property. These wetlands are not characterized by groundwater discharge conditions.
- Subdivision A is projected to reduce infiltration from a pre-development volume of 7,854 m^3 to 3,293 m^3 under the post development condition (deficit of 4,561 m^3), whereas an infiltration deficit of 947 m^3 will be realized at Subdivision B. The overall infiltration deficit will be addressed using post-development LID infiltration strategies that will be employed in Subdivision A through at-source, lot-level infiltration galleries in tandem

with a clean water collector system. Preliminary estimates indicate that the above infiltration augmentation strategy will result in a small annual post-development infiltration surplus within the Subject Lands. As such, the form and function of any natural heritage features that receive groundwater inputs from the Subject Lands will be unaffected.

- The proposed development is not subject to the threat policies in the Source Protection Plan and poses no threat to the quantity of source water available for use by local municipal production wells.
- Construction dewatering is likely to be required for the installation of servicing infrastructure at Subdivision A given proposed servicing depths approximately 0.3 m to 4.5 m below the high perched groundwater table. Groundwater dewatering may also be required for the construction of the proposed SWMF on Subdivision B as portions of the facility are likely to intercept the perched groundwater system.
- In areas where servicing infrastructure extends below the perched groundwater table into lower permeable soils, Stantec recommends that anti-seepage (cut-off) collars be installed to prevent the preferential movement of groundwater along the servicing alignments. An assessment for the need, total number, and exact placements of anti-seepage collars along the servicing alignments can be explored in more detail during the detailed design phase of the project.
- Given that anticipated construction activities at the Subject Lands are not expected to involve the storage or use of bulk chemicals or fuels, any potential spill that may occur would be localized and involve a small volume of material. Overall, standard containment facilities and emergency response materials are to be maintained on-site as required, with refuelling, equipment maintenance, and other potentially contaminating activities being confined to designated areas.

8.6 Geotechnical Reports

The Geotechnical Reports, prepared by Stantec, reviewed subsurface soil and groundwater conditions and provided geotechnical design and construction recommendations for the proposed development.

Within Subdivision A, significant cut and fill activities are required. The report recommended engineered/compacted fill with detailed slope stability analysis on the slopes between the upper and lower subdivisions. Conventional shallow foundations and, where construction is near the existing ground surface, slab-on-grade construction is supported subject to specific construction recommendations. Groundwater control methods will vary across the site through construction given the varied extent of cut-fill operations required to achieve required grades. The predominant subgrade soils can support the proposed site services. Compaction is required prior to placing the granular base for the proposed road extensions.

Within Subdivision B, dewatering will be required during construction of the stormwater management facility. The predominant subgrade soils are anticipated to provide suitable support to the proposed service utility pipes, and the native soils can provide suitable support for the stormwater management facility berm construction. A test pit is recommended prior to construction to estimate the infiltration rate within the facility.

8.7 Stormwater Management Report

The Stormwater Management Report, prepared by Stantec, reviewed the hydrogeologic study, modeled existing and proposed conditions to determine runoff volumes and peak flow rates, and completed a preliminary design of the consolidated stormwater management facility and the infiltration system. The SWM Report proposes that

minor and major system conveyance is to a consolidated stormwater management facility for the Subject Lands within Subdivision B to be designed as a constructed wetland, attenuating flows to match the limits of the downstream system. In addition, distributed infiltration measures within Subdivision A include infiltration galleries connected to rooftops and a clean water collection (CWC) system to capture and infiltrate additional runoff. The proposed system is oversized consistent with City requirements.

8.8 Noise Impact Study

The Noise Impact Study, prepared by Stantec Consulting Ltd., reviewed potential environmental and stationary noise sources affecting the proposed development of the Subject Lands, particularly Subdivision A where new sensitive residential uses are planned.

The study concluded that:

- Units immediately adjacent to Erbsville Road require either a Type A noise warning clause or a noise barrier at the identified outdoor living area (OLA). These units will also require a Type C noise warning clause due to indoor living area sound levels.
- No mitigation or warning clauses are expected to be required for all other areas of the proposed development due to road traffic noise.
- As the sound from rooftop equipment of Extendicare Columbia Forest (ECF) Long-term Care facility is expected to be audible for a portion of Subdivision A, a Type E warning clause is recommended, recognizing that the levels are not expected to exceed applicable criteria.
- No other sources of stationary noise are anticipated to influence sound levels at the proposed development.

8.9 Arborist Report

The Arborist Report, prepared by WSP, included a tree inventory and assessment and prepared a vegetation management plan and an ecological enhancement plan. The tree inventory and assessment identified the following:

- Subdivision A: 83 trees recommended to be retained / preserved, 345 trees required to be removed (including 3 on City property) due to development and related grading works
- Subdivision B: 115 trees recommended to be retained / preserved, 201 trees required to be removed (including 51 on City property) due to development and related grading works

The vegetation management plan provided recommendations for tree removals related to bird nesting periods and active bat periods and noted standard tree protection requirements.

The ecological enhancement plan, consistent with the intent of the now-released conservation easement on the lands, proposes plantings to protect the edges of retained features so they eventually become a functional part of the natural features. These include herbaceous seeding, native species plantings and wildlife habitat features, as well as restricted access (fencing) and sensitive areas signage. Further, removal of invasive species within the development envelope and enhancement areas, including Garlic Mustard and Common Buckthorn, is proposed. Overall, 36 trees are proposed in Subdivision A and 121 trees are proposed in Subdivision B through the ecological enhancement plan. These plantings do not include additional plantings identified through future landscape plans that will be required as conditions of Draft Plan Approval and/or future Site Plan Applications

within Subdivision A and do not include plantings proposed within the stormwater management facility within Subdivision B.

The Arborist report also notes that a transplant strategy has been prepared for the regionally rare smooth-sheathed sedge to a suitable habitat within the adjacent Forested Hills ESPA, referring to the Environmental Impact Study for detail.

Finally, the Arborist Report includes a naturalized planting plan for the stormwater management facility on Subdivision B, which includes 59 trees along with shrubs, riparian plants, emergent plants, and submergent and aquatic plants.

8.10 Archaeological Assessment

A Stage 1-2 Archaeological Assessment was prepared by Detritus Consulting Ltd. for the Subdivision A lands. The Stage 1 background research indicated the study area exhibited moderate to high potential for the identification and recovery of archaeological resources, necessitating a Stage 2 field assessment. The Stage 2 field assessment did not observe any archaeological resources, concluding that no further archaeological assessment is recommended.

The Ministry acknowledgement letter was received on August 8, 2025 and confirmed that the Ministry was satisfied that the fieldwork and reporting are consistent with the Ministry's standards.

8.11 Transportation Impact Study (TIS)

The Transportation Impact Study, prepared by Paradigm Transportation Solutions Limited, reviewed current conditions, projected background conditions, and forecasted total traffic conditions at four intersections as well as the proposed site access to the "lower subdivision" on Erbsville Road. The four intersections were:

1. Erbsville Road & Laurelwood Drive,
2. Erbsville Road & Columbia Forest Boulevard / Willow Woods Drive,
3. Laurelwood Drive & Wild Ginger Avenue, and
4. Columbia Forest Boulevard & Royal Fern Street

Traffic distribution from the upper subdivision forecasted most of the inbound/outbound traffic toward the north via Wild Ginger Avenue.

The study concluded that:

- The study area intersections are currently operating and projected to operate in background conditions within acceptable levels of service and within capacity with no specific problem movements at AM/PM peaks
- The total traffic conditions are also forecast to operate at acceptable levels of service and within capacity with no specific problem movements at AM/PM peaks; further, the queue reach on Laurelwood Drive and Columbia Forest Boulevard at Erbsville Road are not expected to impact the nearest local cross streets
- The proposed site driveway for the "lower subdivision" at Erbsville Road is forecast to operate at Level-of-Service (LOS) D or better during AM/PM Peaks, and do not warrant a left turn lane on Erbsville Road.

Based on those conclusions, the study recommended the development be approved with no conditions related to off-site transportation improvements.

In addition, and at the White Birch Avenue - Royal Fern Street – Multiple-Residential Block intersection, the study recommended that the Royal Fern Street approach be stop-sign controlled instead of the multiple-residential block driveway as it would have fewer conflict points for crossing traffic and pedestrians.

9 Public Consultation Strategy

The Planning Act establishes minimum public consultation and notice requirements for the proposed Plan of Subdivision and Zoning By-Law Amendment applications, which include sign postings on the site, mail-outs to nearby residents (subject to Canada Post availability), and notice for meetings of Council. This is the traditional method of consultation for development applications mandated by the Planning Act.

Should additional public/neighbourhood consultation and engagement be warranted or requested by staff or Council prior to consideration at a Formal Public Meeting, online consultation via Zoom, Google Hangouts or Microsoft Teams would be a preferred alternate format. The applicant will discuss preferred engagement approaches with the City of Waterloo as the development review process is undertaken.

10 Summary and Conclusions

This Planning Justification Report has been prepared in support of the proposed plans of subdivision on the Subject Lands municipally known as 515 Erbsville Road (Subdivision A) and 500 Erbsville Road (Subdivision B), including the surrounding context and the applicable land use planning framework. It also describes the development proposal from our clients and the required planning applications needed to advance the project.

In consultation with the City, this Report has been prepared in support of related planning applications for Draft Plan of Subdivision for both properties and the related Zoning By-law Amendment for Subdivision A.

Based on the review of the applicable land use policies and regulations and in our opinion, the proposed Draft Plans of Subdivision and Zoning By-Law Amendment have regard to the “Matters of Provincial Interest” as defined by the Planning Act, are consistent with the Provincial Planning Statement, and is in conformity with the Region of Waterloo and City of Waterloo Official Plan(s).

Further, it is our opinion that the proposed redevelopment makes efficient use of underutilized lands and municipal infrastructure within a settlement area, provides compatible development with a high quality of urban design, supports the achievement of housing targets, and contributes to the range and mix of housing available within an existing neighbourhood while completing the community. In our opinion, the proposed redevelopment represents good planning, is in the public interest, and is appropriate for the subject properties and the surrounding area.

Therefore, it is our recommendation that the City of Waterloo:

- Together with the completed municipal applications forms and fees deem the combined Draft Plans of Subdivision and Zoning By-Law Amendment application as complete and process the application in accordance with the Planning Act and municipal processes; and,
- Provide the opportunity for review of the Planning Justification Report and supporting materials to the City of Waterloo Council, technical review agencies and the community in accordance with municipal public engagement processes.

Appendix A

Zoning By-law Amendment

Draft Zoning By-law Amendment

That Council approve Zoning By-law Amendment Z-25-XX, 515 Erbsville Road, as follows:

1. That Zoning By-law 2018-050 is hereby amended by adding “CXXX” to Schedule ‘C’ of said By-law 2018-050 for the lands known municipally as “515 Erbsville Road” as shown on Map 1 attached hereto, as set out below:

Exception	Address	Zoning	File Reference
CXXX	515 Erbsville Road	R5, R9, OS1, OS3 CXXX	Z-25-XX 30T-XXXXX

Location: 515 Erbsville Road (30T-XXXXX), Wild Ginger Avenue, White Birch Avenue, Royal Fern Street as shown on Schedule ‘C1’ to this BY-LAW.

Site Specific Regulations:

a) Notwithstanding anything to the contrary, the following additional USE shall be permitted on the lands identified as AREA A and AREA B on Figure 1 hereto:

   i. MULTI-UNIT RESIDENTIAL BUILDING

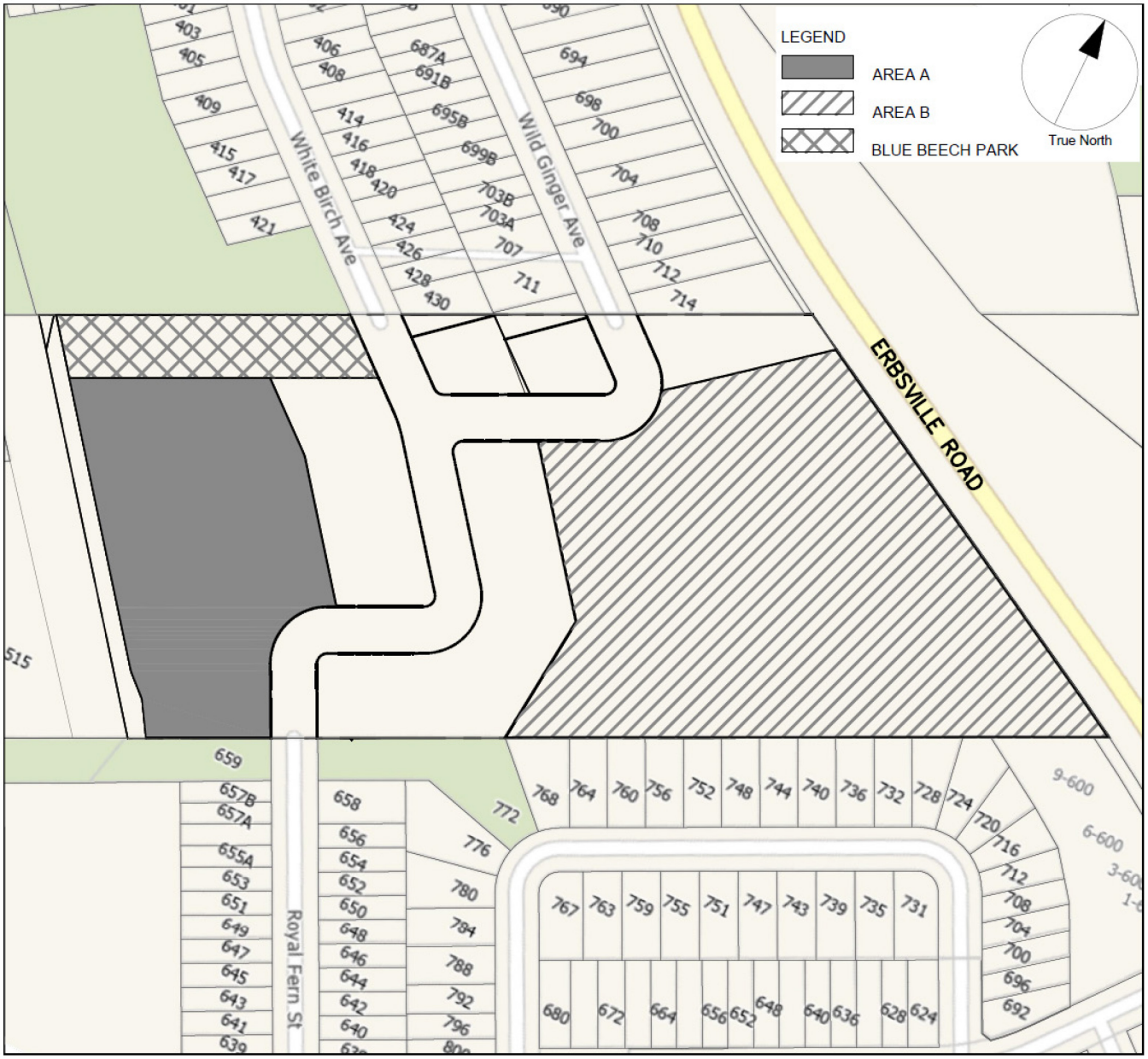
b) Notwithstanding anything to the contrary, the regulations for APARTMENT BUILDING as outlined in the Residential Nine (R9) zone shall apply to a MULTI-UNIT RESIDENTIAL BUILDING on the lands identified as AREA A and AREA B on Figure 1 hereto

c) Notwithstanding anything to the contrary, the following regulations shall apply on the lands identified as AREA A on Figure 1 hereto:

   i. REAR YARD setback (minimum): 6.0 m to Blue Beech Park

   ii. LOW RISE RESIDENTIAL LOT LINE setback (minimum): 6.0 m

FIGURE 1


LEGEND
AREA A
AREA B
BLUE BEECH PARK
True North
ERBSVILLE ROAD
White Birch Ave
Wild Ginger Ave
Royal Fern St
403
405
406
408
409
414
415
416
417
418
420
421
424
426
428
430
687A
691B
695B
699B
703B
703A
707
711
690
694
698
700
704
708
710
712
714
515
659
657B
657A
655A
653
651
649
647
645
643
641
639
658
656
654
652
650
648
646
644
642
640
772
776
780
784
788
792
796
768
764
760
756
752
748
744
740
736
732
728
724
720
716
712
708
704
700
696
692
9-600
6-600
3-600
767
763
759
755
751
747
743
739
735
731
680
672
664
656
652
648
640
636
628
624

MAP 1 - SUBJECT LANDS



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