



March 28th, 2024

VIA EMAIL

Mark Stone, BES, MCIP, RPP
Manager – Development Planning Section (Interim)
City of Cambridge
50 Dickson Street, 3rd Floor, P.O. Box 669
Cambridge, ON, N1R 5W8

**RE: File No. OR08/23
201 Water Street South and 66 Highman Avenue
Official Amendment and Zoning By-law Amendment Applications
Planning Justification Report Addendum**

Dear Mr. Stone,

Please accept this letter as our response to the City's and Region's comments received on March 14th, 2024, regarding the first submission materials of the OPA/ZBA application for the lands municipally known as 201 Water Street South and 66 Highman Avenue. This addendum addresses the City's and Region's comments for the applicable reports/plans. Please refer to the comment-response matrix attached as part of this submission for a fulsome response addressing each of the comments in detail.

This addendum outlines the updates to the architectural set, as well as additional planning analysis of policies related to affordable housing, urban design standards/compatibility, and infill development.

UPDATED ARCHITECTURAL PLANS

The Architectural Package prepared by Cynthia Zahoruk Architects has been updated to provide new view perspectives, in particular from Highman Avenue, with renderings of the rear of the proposed development and vegetative buffering.

Furthermore, the updated Architectural Package and addendum confirms that a surplus of three parking spaces is provided with this proposal.

PLANNING POLICY ANALYSIS

Affordable Housing

Comments from the City's Development Planning staff noted that the Planning Justification Report (PJR) did not sufficiently address affordable housing policies; namely, PPS policies 1.1.1(b) and 1.4.3, Growth Plan policies 1.2.2 and 2.2.1.4, and the City's Official Plan policy 2.6.1.6. Further discussion and justification is provided in **Table 1** below with regard to the affordable housing policies.

Table 1 – Affordable Housing Policies

Plan	Policy	Response
Provincial Policy Statement (2020)	<p>1.1.1</p> <p>(b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;</p>	<p>The proposed development is for three residential towers that consist of a total of 330 residential units. The units are comprised of a mix of unit types, with 152 one-bedroom units, 71 one-bedroom plus den units, and 107 two-bedroom units. These units range in size from approximately 538 square feet to 1,076 square feet.</p> <p>The Subject Lands are located in an area that is predominately comprised of single-detached dwellings. The provision of 330 residential apartment units in a variety of unit configurations introduces housing diversity and choice to the City's existing housing stock. Furthermore, the</p>

Plan	Policy	Response
		<p>proposed development represents intensification and infill within the Delineated Built-Up Area, making efficient use of land and municipal services. Approved development at 193 Water Street South includes a mix of apartment and townhouse units in five 15-storey towers.</p>
	<p>1.4.3</p> <p>(a) establishing and implementing minimum targets for the provision of housing which is affordable to low- and moderate-income households and which aligns with applicable housing and homelessness plans. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;</p>	<p>The proposed development will be ownership units so that rental figures provided in the Waterloo Region comments are not applicable. It is anticipated that up to 20 one bedroom units will be sold to achieve the affordable price as identified in the table provided in the Region's comments (refer to Comment/Response Table and the chart provided in the Region's comments).</p>
	<p>1.4.3</p> <p>(b) permitting and facilitating:</p> <p>1) all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and</p> <p>2) all types of residential intensification, including additional</p>	<p>The proposed development is for 330 residential apartment units in an evolving area that includes a low-rise neighbourhood comprised of single-detached dwellings to the east and the recently approved project at 193 Water Street South of 5 towers and 991 residential units. The proposal introduces housing options for current and future Cambridge residents in the neighbourhood, while the proposed unit mix contributes to increased housing choice for</p>

Plan	Policy	Response
	residential units, and redevelopment in accordance with policy 1.1.3.3;	<p>various households of different sizes, incomes, and ages.</p> <p>Lastly, the proposed development represents intensification with a compact built form, making an efficient use of the Subject Lands which are currently largely vacant and underutilized.</p>
Growth Plan for the Greater Golden Horseshoe (2020)	<p>1.2.2 Support a range and mix of housing options, including additional residential units and affordable housing, to serve all sizes, incomes, and ages of households.</p>	<p>The proposed development contributes to a range and mix of housing options in an area with low-rise and low-density built forms to the east. The approved development to the north of the Subject Lands includes both apartments and townhouses. This proposal increases the range of housing choice by introducing a high-density and compact built form with various unit types to meet the needs of households of different sizes, incomes and ages including housing at the affordable price prescribed by the Region of Waterloo for some one bedroom units.</p>
	<p>2.2.1.4</p> <p>(c) provide 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</p>	<p>As mentioned above, the unit configurations consist of one-bedroom, one-bedroom plus den, and two-bedroom units in a range of sizes, which will accommodate the needs and sizes of different households including housing at</p>

Plan	Policy	Response
	accommodate the needs of all household sizes and incomes;	an affordable price as prescribed by the Region of Waterloo
City of Cambridge (2012) Official Plan	<p>2.6.1.6 Intensification within the built-up area will be planned and designed to:</p> <p>(b) provide for a range and mix of housing that takes into account affordable housing needs;</p>	<p>The Proposed Development will increase housing supply and diversify the range and mix of housing units in the area, be compatible with the area's mix of land uses, and contribute to the vibrancy of the commercial core of Downtown Galt.</p> <p>It is anticipated that the one bedroom units will achieve the affordable ownership price as identified by Waterloo Region in their comments.</p>

Appropriate Development Standards

The City further noted that the Planning Justification Report (PJR) did not sufficiently address PPS policy 1.1.3.4 with respect to appropriate development standards for intensification, redevelopment and compact built form. The PPS policy and additional analysis is outlined below:

1.1.3.4 Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.

The proposed development is intensification at a density of 219 units per hectare within the City's Built-Up Area, in proximity to downtown Galt. As existing, the Subject Lands have an area of 1.51 hectares and contain a 2-storey heritage building. The adjacent property to the north at 193 Water Street South has been approved for a 991-unit residential development, consisting of five 15-storey towers. Given the large and underutilized lot, proximity to downtown, and immediate context, the Subject Lands represent an appropriate opportunity for intensification and redevelopment in the neighbourhood. The proposed development utilizes appropriate development standards that promote urban design excellence while contributing to increased housing choice and housing supply, maintenance of the property's natural features, and enhancement of the City's cultural heritage.

The overall site layout is configured around a podium/tower combination which is well designed, with consideration given to the façade and tower separation. The site layout is efficiently utilized to provide for appropriate ingress/egress that minimizes vehicular conflict, safe and continuous pedestrian linkages throughout the site, an emergency exit to Highman Avenue in a major flood event, and appropriate placement of vehicle and bicycle parking. Vehicular parking is provided both as uncovered surface parking and as structured parking within the 3-storey podium. The proposed surface parking is located close to the residential entrances with safe and convenient access through sidewalks and are further screened by the existing vegetation from Water Street. Bicycle parking is provided both indoors and outdoors, with outdoor parking conveniently located at the entrance to each residential tower.

Furthermore, public health and safety are addressed through the assessment of potential contamination and remediation measures on-site, the provision of an emergency exit to Highman Avenue, the incorporation of appropriate noise and air quality mitigation into the site design, and construction recommendations to mitigate impacts on wildlife. Overall, the development provides for a compact built form with consideration for compatible design, regard for existing cultural heritage and natural features, and implementation of appropriate development standards.

Urban Design Considerations

City staff had the following comment on the Urban Design Brief and Viewshed Analysis:

The Urban Design Brief and Viewshed Analysis suggests that the view to the “cultural heritage building is enhanced through the design of the site and the proposed buildings” but Development Planning staff questions the statement that “the provided setbacks ensure the stone residence stands out and away from the proposed development”. The visibility of the stone residence could be enhanced, for example through increased setback of proposed Tower #1.

As existing, the stone residence is not visible from Water Street due to the existing vegetation. The proposed development will allow for the cultural heritage building to be visible to passersby from the streetscape, thereby improving the existing condition. Furthermore, while the setback is 5.5 metres between the fourth floor terrace and the stone residence, the development is further stepped back 16.35 metres above the fifth floor, providing an even greater distance that mitigates potential impacts while ensuring the stone residence is set apart from the proposed development. In addition to this, the stone residence is further enhanced by the use of terraced landscaping, effectively addressing differences in elevation by providing access to the stone residence through unique landscaping design. This treatment of the stone residence sets it apart from the rest of the development and places an emphasis on its heritage and design value. The proposed setbacks and terraced landscaping altogether enhance the stone residence, ensuring a distinct sense of place that respects its cultural heritage value, while still

remaining cohesive and compatible with the rest of the development. Lastly, the Cultural Heritage Impact Assessment prepared by Bright Fast reviewed the relationship between the stone residence and the proposed development, concluding that the proposed setbacks and terraced outlook will visually separate the new and old structures on the property, and further reveal the stone residence to the public realm. The report notes that this makes the proposed development reasonable and acceptable from a heritage impact perspective.

Infill Development Policy

Policy 8.4.2.2 was identified by City staff as requesting a response from the applicant. Policy 8.4.2.2 states:

Infill, intensification and redevelopment within existing neighbourhoods will be minor in nature and will be compatible with the surrounding neighbourhood character.

The following will be considered in assessing whether the development is minor in nature:

- a) comparable building height, generally within two storeys of neighbouring buildings;*
- b) massing and scale;*
- c) similar lot coverage and side yard setbacks to neighbouring housing;*
- d) maintain the predominant or average front yard setback;*
- e) built form that respects the façade details and materials of neighbouring housing, including garage width, porches, screening and architectural details;*
- f) transportation implications; and*
- g) appropriate parking arrangements and traffic movement.*

It is our submission that the proposed intensification is not within an existing neighbourhood. The Subject Lands front onto Water Street South and do not have direct access via driveways or streets to the adjoining residential community to the east. In addition, there is a significant elevation change between 201 Water Street South and the neighbourhood to the east. The more relevant context is between the Subject Lands and the property immediately to the north and more broadly the Water Street area. With regard to the property to the north and the general context on Water Street South, we note the following:

- This area is significantly lower in elevation than the adjoining neighbourhood to the east;
- The lands on Water Street South do not have driveway or street access to the adjoining neighbourhood to the east – either existing or planned;

- The lands on Water Street South are in proximity to the Urban Growth Centre;
- The lands on Water Street South are on existing and planned transit routes;
- The lands on Water Street South have a physical relationship and presence to the Grand River;
- The approved development at 193 Water Street South includes 5 towers of 15 storeys apiece plus additional townhouse units. This approval sets the form for this area of Water Street South and the proposal for the Subject Lands is compatible with the approved development;
- Both the approved development at 193 Water Street South and the proposal for the Subject Lands have driveway access to Water Street South and not through the adjoining neighbourhood to the east;

It is our conclusion that Policy 8.4.2.2 is to address infill and intensification in existing low density neighbourhoods as there are numerous references that imply a low density form of development (example: porches). Notwithstanding this, we offer the following:

- a) The proposed development is within 2 storeys in height of the adjoining approved development at 193 Water Street South with the exception of the central tower which is lower in height for design reasons and compatibility reasons;
- b) The massing and scale is similar to the adjoining development to the north;
- c) The coverage and side yard setbacks are appropriate for the proposed development and are similar to the adjoining approved development;
- d) The front yard setbacks are similar to the development to the north and recognize the existing topography;
- e) The built form is consistent in terms of the podium/tower approach;
- f) A road widening is contemplated to be conveyed to Waterloo Region. A Transportation Impact Study has been completed, revised, and is submitted with the second submission;
- g) The proposed development exceeds the required parking, includes significant bicycle parking, and provides appropriate traffic and transportation movement to Water Street South and within the site as well as to Highman Avenue for emergency vehicles.

We trust that the foregoing is satisfactory.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



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