PLANNING OPINION REPORT

32, 36 & 38 GRAND AVENUE SOUTH
CITY OF CAMBRIDGE
REGION OF WATERLOO

PREPARED FOR:
GRAND AVE. DEVELOPMENTS (CAMBRIDGE) LP

OFFICIAL PLAN AMENDMENT & ZONING BY-LAW AMENDMENT

PREPARED BY:

SCOTT J. PATTERSON, BA, CPT, MCIP, RPP
PRINCIPAL

DATE: JANUARY 2025
PROJECT NO.: 120

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1.0 INTRODUCTION

Patterson Planning Consultants Inc. has been retained by Grand Ave. Developments (Cambridge) LP (the "Owner"), regarding the lands municipally addressed as 32, 36 and 38 Grand Avenue South in the City of Cambridge, Region of Waterloo (the "Subject Property"). The lands are legally described as Lots 23, 24 and Part of Lot 22 and Part of Lots 2 and 22 Registered Plan 456, City of Cambridge, Region of Waterloo. Patterson Planning Consultants Inc. ("PPC") is responsible for providing a Planning Opinion regarding an Official Plan Amendment and Zoning By-law Amendment proposed for the subject lands. The intended use of the Subject Property is a high rise residential development project.

The lands are located on the western side of Grand Avenue South in the Galt City Centre Core Area of the City of Cambridge. The proposed Official Plan Amendment and Zoning By-law Amendment applications (the "Applications") are necessary to facilitate the development of the Subject Property with a mixed use building including a six (6) storey podium with commercial uses on the ground floor and a residential tower of twenty-two (22) storeys (the "Proposed Development").

Pre-consultation was undertaken with the City of Cambridge and Region of Waterloo in March 2023 to determine the requirements for a complete application. A Planning Opinion Report was noted as a complete application requirement and this report should be read in conjunction with all of the other submission materials prepared in support of the Applications.

PPC has prepared this Planning Opinion report on behalf of the Owner in support of permitting the development of the Subject Property. The Owner intends to consolidate the Subject Property and is seeking the Official Plan amendment to increase height and density. The concurrent Zoning By-law Amendment application is for site specific provisions to permit the Proposed Development.

This report has been authored to provide a review of the relevant planning context to form a "Complete Application" and to provide an opinion supporting the required approvals. The report will also provide a summary of the technical studies completed in support of the Applications.

2.0 PRE-CONSULTATION

Pre-consultation was undertaken with the City of Cambridge and Region of Waterloo on behalf of the Owner in March 2023. It was confirmed that for the Applications to be deemed complete a full submission would include:

1. Official Plan Amendment Application
2. Zoning By-Law Amendment Application
3. Floor Plans
4. Concept Plan(s)
5. Functional Servicing Report
6. Heritage Impact Assessment
7. Massing Models and Elevations
8. Noise Study
9. Parking Study (no longer required based on Provincial legislation)
10. Planning Opinion Report
11. Record of Site Condition (subsequently waived by the Region of Waterloo)
12. Shadow Study
13. Wind Study
14. Section 59 Notice
15. Stormwater Management Report
16. Hydrogeological Assessment
17. Transportation Impact Study

18. Urban Design Report

19. Applicable Fees

This Planning Opinion Report will provide an opinion on all the related planning policies including matters of Provincial Interest, the Provincial Planning Statement, 2024, the Region of Waterloo Official Plan, City of Cambridge Official Plan, City of Cambridge Zoning By-law 150-85 as well as comments regarding the proposed Applications and public consultation strategy.

3.0 SITE DESCRIPTION

The City of Cambridge is a city in the Regional Municipality of Waterloo, Ontario. The City is located at the confluence of the Grand River and Speed River. As of 2021 the City had a population of ~138,500 residents. The Subject Property is located with the Galt City Centre Core Area with a history dating back to 1816. Galt attracted industry by 1840 and became the largest Town in the Grand River area until the early 1900's. A successful industrial base allowed the Town to continue to grow using the power (water power) of the Grand River that supported the industrial land uses. Galt was incorporated as a town on January 1, 1857 and further as a City in 1915. Galt became part of Cambridge in 1974.

The Subject Property includes the lands of 32, 36 and 38 Grand Avenue South. The lands are located on the west side of Grand Avenue between Hood Street and St. Andrews Street.

The subject lands are legally described as:

Lots 23, 24 and Part of Lot 22 and Part of Lots 2 and 22, Registered Plan 456, City of Cambridge, Regional Municipality of Waterloo.

The Subject Property has a total lot area of 2044.8m² (0.204ha) with ~52.9m of frontage along Grand Avenue South and 42.4m of frontage onto Hood Street. As Hood Street is the shortest of the lot frontages of this corner lot it is considered the Front Lot Line. The Grand River is located to the east of the Subject Property.

Figure 1: 2024 Air Photo Source: Region of Waterloo GIS

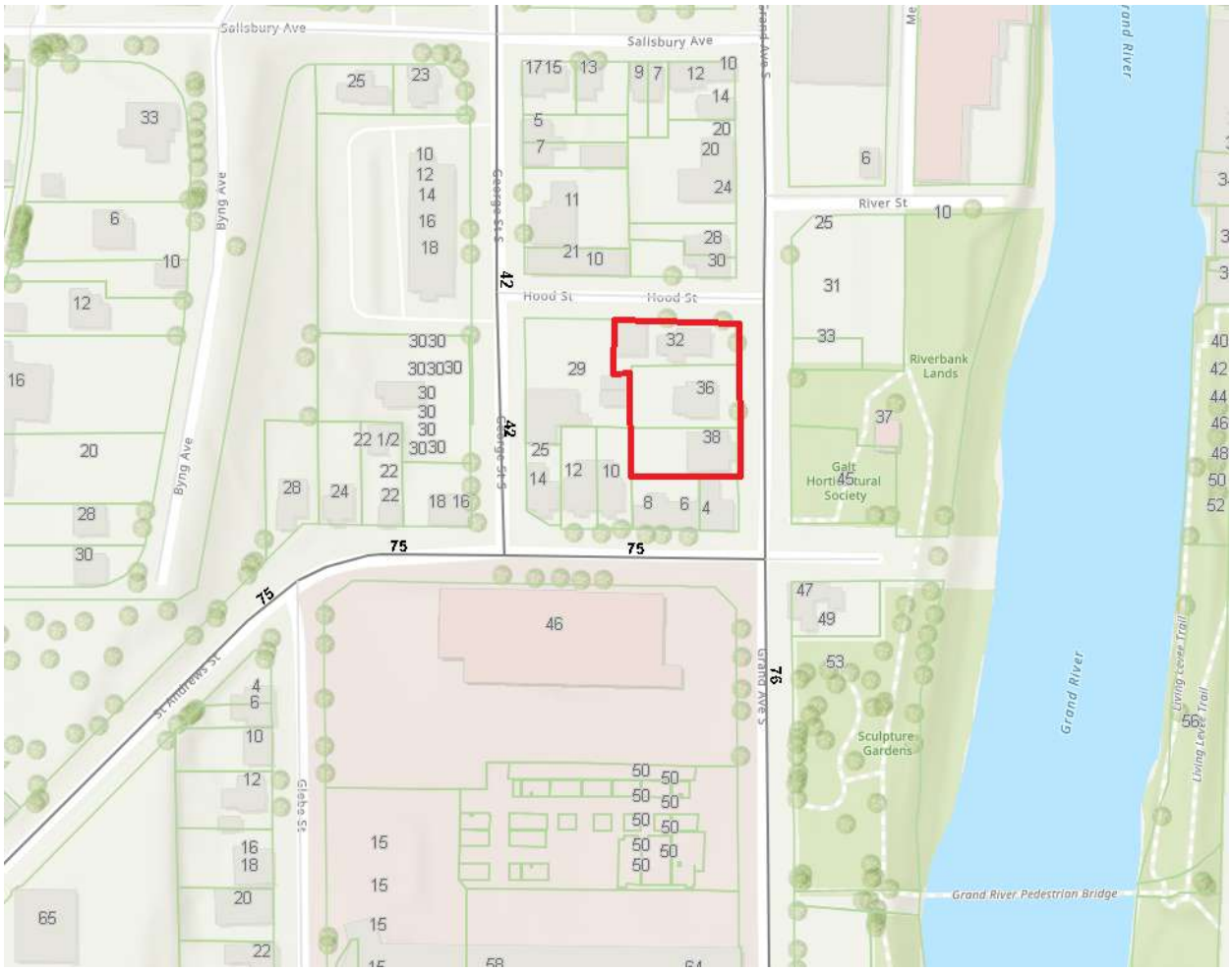


Figure 2: Surrounding Area. Source: Region of Waterloo GIS

The Subject Property is located within the Dickson Hill Heritage Conservation District and includes a listed property on the Municipal Heritage Register, being 38 Grand Avenue South. The Subject Property includes a large portion of the block of land bounded to the north by Hood Street, to the east by Grand Avenue South, to the south by St. Andrews Street and to the west by George Street. Each building contains one building, all of which are commercial in use save for 38 Grand Avenue south which also contains a residential component. All of the existing buildings and features on site are proposed to be demolished as part of the redevelopment of the Subject Property.

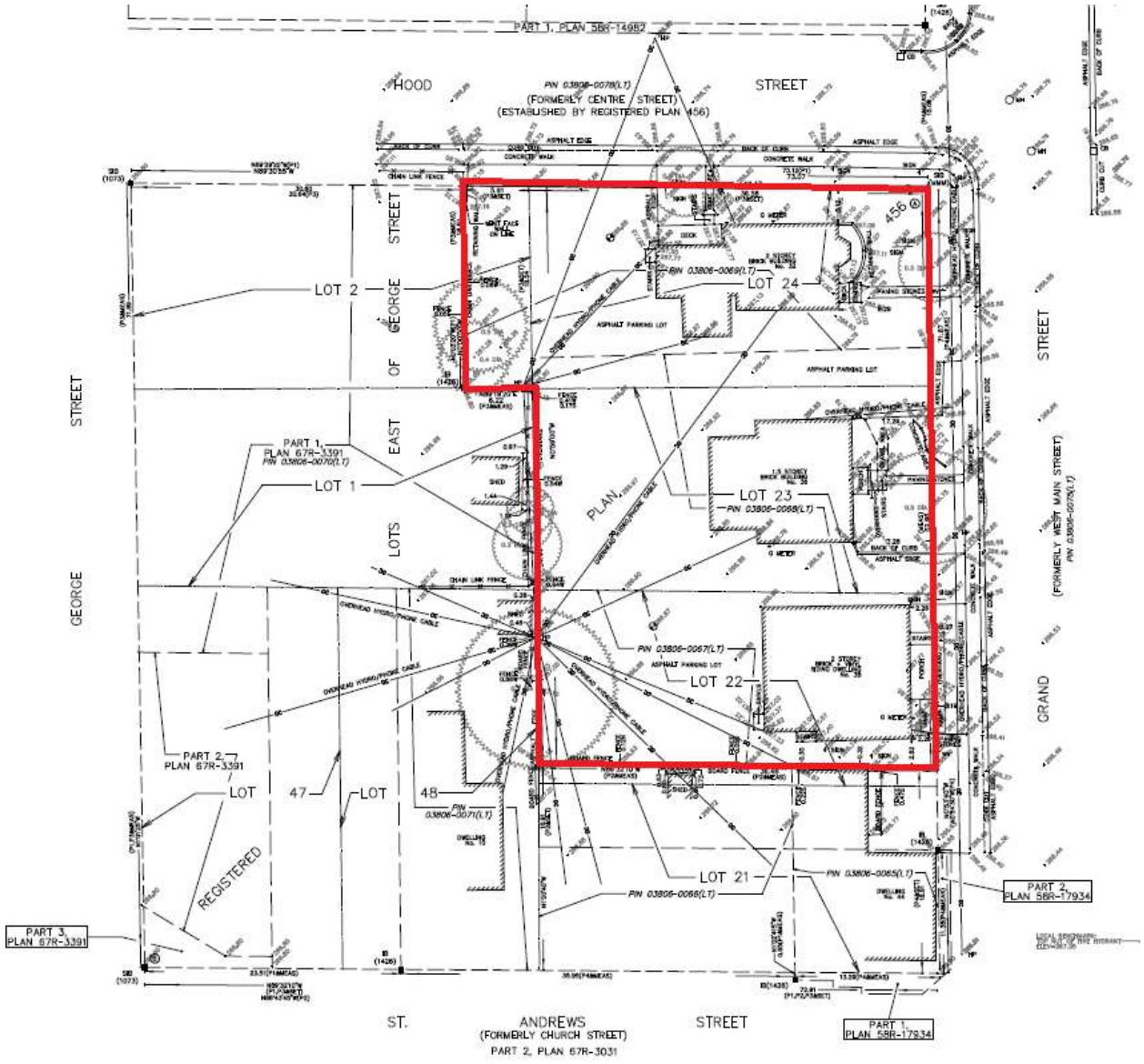


Figure 3: 2023 Survey Source: J.D. Barnes Limited

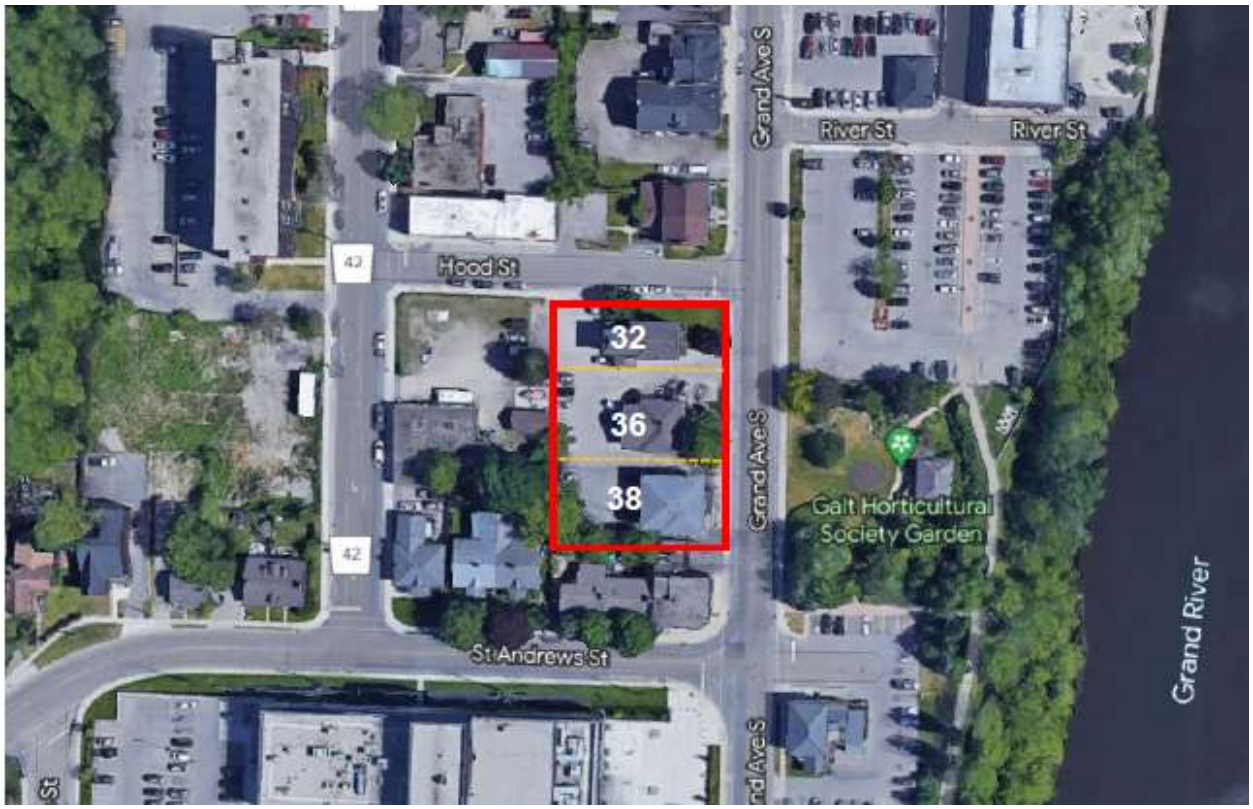


Figure 4: Property addressing

Figure 5: 32 Grand Avenue South

Figure 6: 36 Grand Avenue South

Figure 7: 38 Grand Avenue South

The surrounding land uses can be described as:

North - Hood Street immediately abuts the Subject Property to the north. Beyond Hood Street are a mix of land uses including residential and commercial.

East – Grand Avenue South immediately abuts the Subject property to the east. Beyond Grand Avenue South is a parking lot and the Grand River.

South – Immediately abutting the Subject Property to the south is a commercial land use (restaurant) and residential land uses. St. Andrews Street provides a separation to the Hamilton Family theatre and other commercial land uses. Also to the south is the "Gaslight District" which is a mixed use development offering eating, drinking and shopping experiences. This includes the "Gaslight Condos" which are two 15 storey residential towers with approximately 400 units.

West – To the west are low rise commercial buildings and George Street South. For the surrounding land uses please refer to Figure 8 as provided below. To the west of George Street South residential multiple dwellings have been constructed (4-7 storeys)

Figure 8: Surrounding land uses. Source: Region of Waterloo GIS

Figure 9: Grand Avenue South looking south from Hood Street
Source: Google

Figure 10: Hood Street looking west from Grand Avenue South
Source: Google

Figure 11: Grand Avenue South looking north from St. Andrews Street
Source: Google

Figure 12: St. Andrews Street looking west from Grand Avenue South
Source: Google

Figure 13: George Street looking north from St. Andrews Street
Source: Google

Figure 14: Hood Street looking east from George Street
Source: Google

4.0 PROPOSAL

The proposed Official Plan Amendment and Zoning By-law Amendment applications (the "Applications") are necessary to facilitate the development of the Subject Property with a mixed use building including a six (6) storey podium with commercial uses on the ground floor and a residential tower of twenty-two (22) storeys (the "Proposed Development"). Three hundred and twenty-eight (328) residential units are proposed as well as four hundred and fifty four (454) square meters of commercial space.

The Proposal is subject to an off-site parking agreement in favour of the lands at 44 Grand Avenue South. The restaurant use at this address has an off-site parking agreement for sixteen (16) parking spaces to be provided in support of the restaurant use. A total of 150 parking spaces are proposed (including the spaces in support of 44 Grand Avenue South). Class A bicycle parking of 83 spaces and 6 Class B bicycle parking spaces are also proposed. The ground floor of the Proposal also includes garbage and mechanical rooms in addition to the vestibule and lobby for the residential dwellings. The commercial uses will be focused to face Grand Avenue South. The 328 units are proposed to be provided on the basis of 274 bachelor / one bedroom units and 54 two bedroom units.

The Official Plan amendment would implement two site specific policies to allow an increase in density and height while maintaining the existing designation.

- A maximum Floor Space Index of 13.5
- A maximum height of 28 storeys (88m)
- A maximum density of 1605 u/ha

The Zoning By-law amendment would implement site specific regulations which are outlined below. The existing "(F) C1RM1 zoning would remain.

- A Maximum Density of 1605 units per hectare whereas 250 units per hectare is permitted
- A Minimum Front Yard setback of 0.0m whereas 4.5m is required

- A Minimum Exterior Side Yard setback of 3.6m whereas 4.5m is required
- A Minimum Interior Side Yard setback of 11.9m whereas 12.0m is required
- A Minimum Rear Yard setback of 11.1m whereas 12.0m is required
- A Maximum Building Height of 88.0m whereas 21m is permitted.
- A Reduction in the required Amenity Area from 7100m² to 4874m²

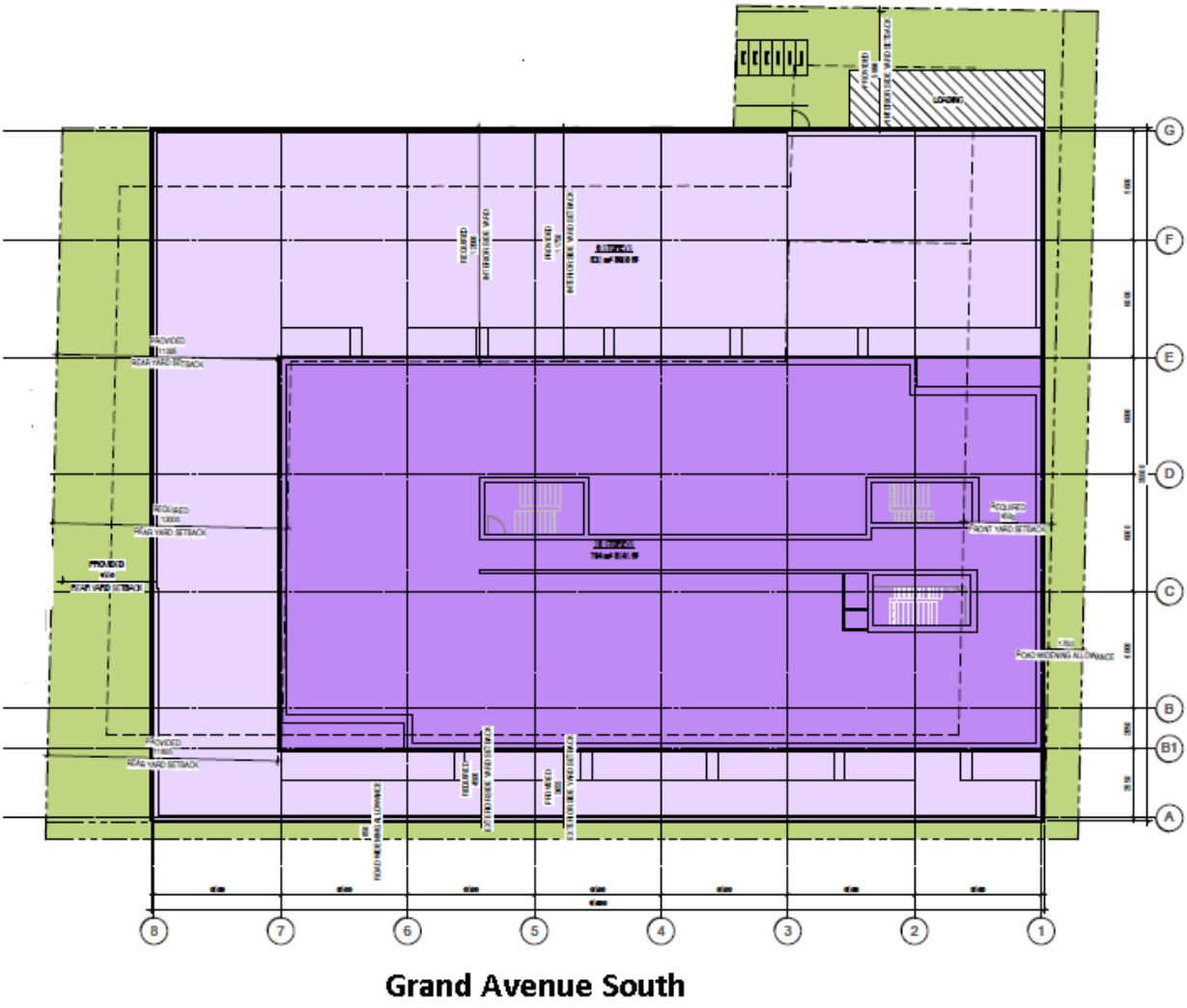


Figure 15: Concept Site Plan Source: NEO Architecture Inc.

Figure 16: Proposed building – looking north from St. Andrews Street Source: NEO Architecture Inc.

Figure 17: Proposed building – looking south from Grand Avenue South Source: NEO Architecture Inc.

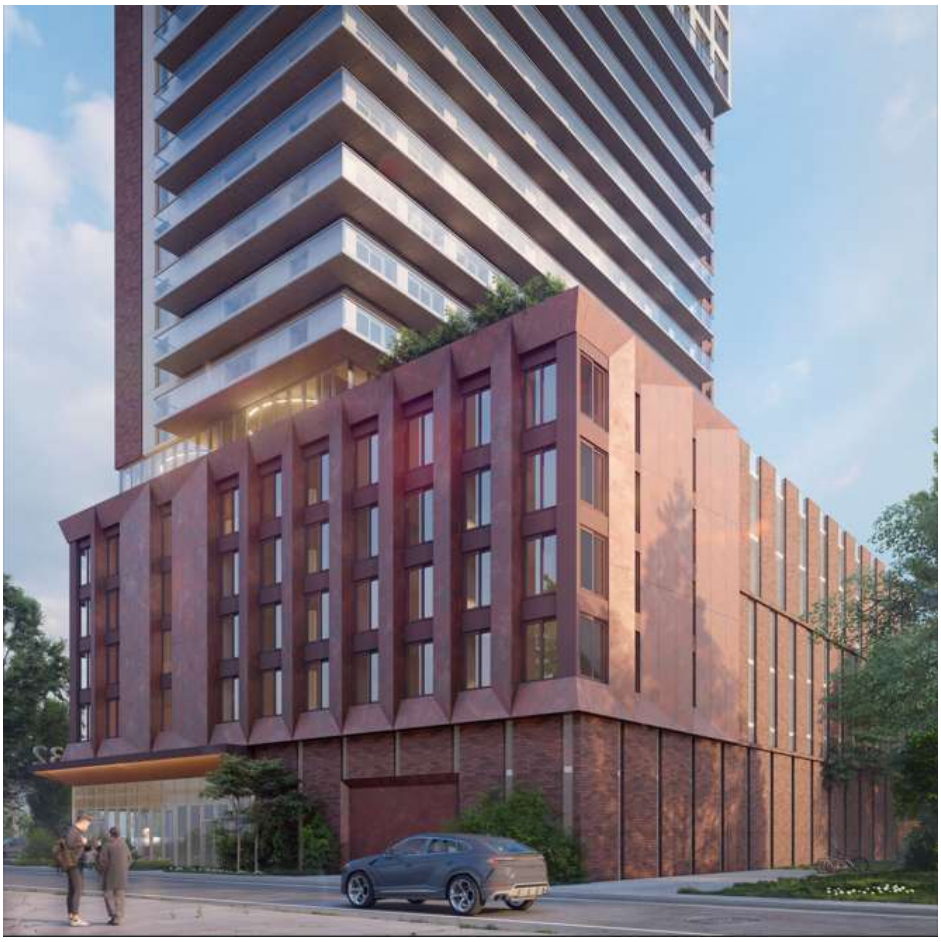


Figure 18: Proposed building – looking south from Hood Street Source: NEO Architecture Inc.

A singular vehicle access is proposed to Hood Street to the structured parking proposed as part of the development. A six storey podium is proposed for the base of the building, The 22 storey tower portion will proceed from the podium base. A rooftop amenity area is proposed on the roof of the podium. This rooftop area is 830m² and will be programmed as the project progresses through Site Plan Approval. Additional amenity area will be provided via a balcony for each dwelling unit and a rooftop amenity area on top of the building encompassing 775m².

The Subject Property is located in the Galt City Centre. Galt is one of the planned focal points for intensification in the City of Cambridge. It is intended to accommodate a significant portion of the City's future population and employment growth in a compact, dense and transit supportive form. The Galt City Centre is a focal point for community services as well as civic

amenities. The overall area includes many commercial, institutional, recreational and employment uses.

The Subject Property is contained within an area that will be undergoing change from a transportation context as the preferred route for Stage 2 of the ION Rapid Transit system proposed a downtown Cambridge station. The Subject Property, as noted, is within the area identified as a Major Transit Station Area to recognize the location of this proposed station. Detailed / final planning for this preferred route is ongoing.

The Proposal will include a compliment of bicycle parking for residents. Additionally, 150 parking spaces are proposed in support of the commercial and residential uses (including 16 spaces allocated to an abutting property in support of an off-site parking agreement). As the Subject Property is located within an MTSA there is no minimum parking requirement that can be imposed by the Municipality. The Owner believes that the provision of parking is still integral to the success of this project and as such parking is being provided at a reasonable rate.

5.0 PLANNING POLICIES

5.1 *PLANNING ACT*

Section 2 of the *Planning Act* establishes matters of provincial interest and states that "the Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

a) The protection of ecological systems, including natural areas, features and functions;

b) The protection of agricultural resources of the Province;

c) The conservation and management of natural resources and the mineral resource base;

d) The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;

e) The supply, efficient use and conservation of energy and water;

f) The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;

g) The minimization of waste;

h) The orderly development of safe and healthy communities;

i) h.1) The accessibility for persons with disabilities to all facilities, services, services and matters to which this Act applies;

j) The adequate provision and distribution of educational, health, social, cultural and recreational facilities;

k) The adequate provision of a full range of housing, including affordable housing;

l) The adequate provision of employment opportunities;

m) The protection of the financial and economic well-being of the Province and its municipalities;

n) The co-ordination of planning activities of public bodies;

o) The resolution of planning conflicts involving public and private interests;

p) The protection of public health and safety;

q) The appropriate location of growth and development;

r) The promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;

s) The promotion of built form that,

t) Is well-designed,

u) Encourages a sense of place, and

v) Provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;

w) The mitigation of greenhouse gas emissions and adaptation to a changing climate."

I am of the opinion that the Applications have regard for the matters of provincial interest set out in Section 2 of the *Planning Act* and do not conflict with the matters of provincial interest as the development will be a well-designed built form in an area that has been identified for growth and development, and represents orderly and efficient development.

5.2 PROVINCIAL PLANNING STATEMENT (2024)

The subject lands are located within a Settlement Area as defined by the 2024 Provincial Planning Statement (PPS). The lands are within the Galt City Centre Core Area in the City of Cambridge Official Plan. The City of Cambridge Official Plan is from 2012 and does not reflect changes at the Provincial and Regional level that direct the development of these lands. The Regional Official Plan was updated in 2022 and the Subject Property is identified as being within the "Downtown Cambridge Station" which is a Major Transit Station Area.

The Provincial Planning Statement (PPS), 2024 is a streamlined province-wide land use planning policy framework that replaces both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 while building upon housing-supportive policies from both documents. It came into effect October 20, 2024.

The PPS 2024 provides municipalities with the tools and flexibility they need to build more homes. It enables municipalities to:

- plan for and support development, and increase the housing supply across the province
- align development with infrastructure to build a strong and competitive economy that is investment-ready
- foster the long-term viability of rural areas
- protect agricultural lands, the environment, public health and safety

The Provincial Planning Statement is a policy statement issued under the authority of section 3 of the Planning Act and came into effect on October 20, 2024. The Provincial Planning

Statement applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024.

Chapter 2 of the PPS 2024 provides policy direction on Building Homes, Sustaining Strong and Competitive Communities as follows:

2.1 Planning for People and Homes

1. As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.

2. Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.

3. At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.

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.

5. Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.4 shall be based on and reflect the allocation of population and units by the upper-tier municipality.

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, longterm 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

c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups

Section 2.2 of the PPS 2024 provides Housing policies as follows:

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 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.

Section 2.3 provides policy direction for Settlement Areas as follows:

2.3.1 General Policies for Settlement Areas

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.

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;

d) are transit-supportive, as appropriate; and e) are freight-supportive.

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.

4. Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.

5. Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.

6. Planning authorities should establish and implement phasing policies, where appropriate, to ensure that development within designated growth areas is orderly and aligns with the timely provision of the infrastructure and public service facilities.

Section 2.4 speaks to development in Strategic Growth Areas as follows:

2.4.2 Major Transit Station Areas

1. Planning authorities shall delineate the boundaries of major transit station areas on higher order transit corridors through a new official plan or official plan amendment adopted under section 26 of the Planning Act. The delineation shall define an area within an approximately 500 to 800- metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.

2. Within major transit station areas on higher order transit corridors, planning authorities shall plan for a minimum density target of:

> *a) 200 residents and jobs combined per hectare for those that are served by subways;*
>
> *b) 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or*
>
> *c) 150 residents and jobs combined per hectare for those that are served by commuter or regional rail.*

3. Planning authorities are encouraged to promote development and intensification within major transit station areas, where appropriate, by:

a) planning for land uses and built form that supports the achievement of minimum density targets; and

b) supporting the redevelopment of surface parking lots within major transit station areas, including commuter parking lots, to be transit-supportive and promote complete communities.

4. For any particular major transit station area, planning authorities may request the Minister to approve an official plan or official plan amendment with a target that is lower than the applicable target established in policy 2.4.2.2, where it has been demonstrated that this target cannot be achieved because:

a) development is prohibited by provincial policy or severely restricted on a significant portion of the lands within the delineated area; or

b) there are a limited number of residents and jobs associated with the built form, but a major trip generator or feeder service will sustain high ridership at the station or stop.

5. Planning authorities may plan for major transit station areas that are not on higher order transit corridors by delineating boundaries and establishing minimum density targets.

6. All major transit station areas should be planned and designed to be transit-supportive and to achieve multimodal access to stations and connections to nearby major trip generators by providing, where feasible:

a) connections to local and regional transit services to support transit service integration;

b) infrastructure that accommodates a range of mobility needs and supports active transportation, including sidewalks, bicycle lanes, and secure bicycle parking; and

c) commuter pick-up/drop-off areas.

The Subject Property is identified as being within a Special Policy Area in the Cambridge Official Plan. Section 5.2 of the PPS 2024 provides policy direction on Natural Hazards. Policy 5.2.3 notes the following:

3. Development and site alteration shall not be permitted within:

a) the dynamic beach hazard;

b) defined portions of the flooding hazard along connecting channels (the St. Marys, St. Clair, Detroit, Niagara and St. Lawrence Rivers);

c) areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard; and

d) a floodway regardless of whether the area of inundation contains high points of land not subject to flooding.

Further Section 5.2 5. states the following:

Despite policy 5.2.3, development and site alteration may be permitted in certain areas associated with the flooding hazard along river, stream and small inland lake systems:

a) in those exceptional situations where a Special Policy Area has been approved. The designation of a Special Policy Area, and any change or modification to the official plan policies, land use designations or boundaries applying to Special Policy Area lands, must be approved by the Ministers of Municipal Affairs and Housing and Natural Resources and Forestry prior to the approval authority approving such changes or modifications; or

b) where the development is limited to uses which by their nature must locate within the floodway, including flood and/or erosion control works or minor additions or passive non-structural uses which do not affect flood flows.

I am of the opinion that the Proposal is consistent with the PPS 2024 as it is a well-designed built form on an underdeveloped property that has been identified for growth and development, and represents an orderly and efficient development that will occur on full municipal services. As will be discussed in latter sections of this report, the Applications support the orderly development of safe and healthy communities within an appropriate growth allocation, provides a full range of housing and promotes sustainable development that supports public transit. There is an emphasized need to intensify underutilized land to increase housing supply, by prioritizing intensification and optimizing the efficient use of urban land and infrastructure,

especially in Major Transit Station Areas ("MTSA's"). The current Official Plan policies of the City of Cambridge and height limitations are not reflective of these PPS policies and the emphasis on optimization of lands and existing infrastructure.

The minimum density within an MTSA, serviced by light rail is 160 people / jobs per hectare. The Proposal is for 328 units that results in a density of ~1605 units per hectare. The PPS direction refers to gross density (which includes lands such as roads and park) rather than net density which is calculated on an individual site basis.

The Galt City Centre Core Area contains two specific land use designations including the "Urban Growth Centre" and the "Community Core Area". Given the historic nature of the Urban Growth Centre the City will need to leverage all available opportunities for new housing in the Community Core Area to meet housing forecast and provincial targets. Optimizing the Subject Property and using the existing infrastructure, public transit and commercial and employment opportunities to be consistent with the PPS 2024.

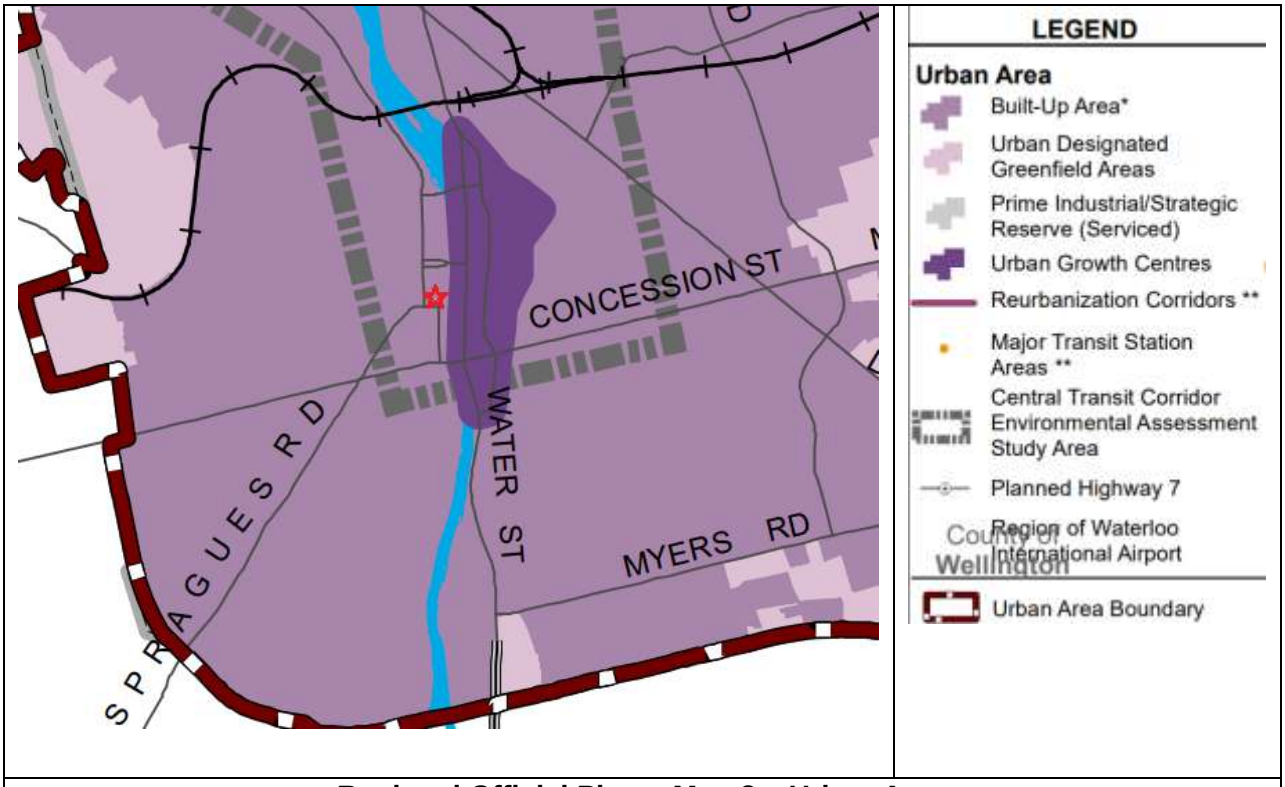
5.3 REGION OF WATERLOO OFFICIAL PLAN

The Subject Property is designated "Urban Area" and "Built-Up Area" on Schedule 3a of the Regional Official Plan ("ROP"). Urban Area policies of the ROP identify that the focus of the Region's future growth will be within the Urban Area and the proposed development conforms to Policy 2.F of the ROP as the proposed development will support the achievement of the minimum intensification targets within the delineated Built-Up Area. Growth is directed to the Built-Up Area of the Region to make better use of infrastructure that can assist in transitioning the Region into an energy efficient, low carbon community.

Furthermore, intensification within the Built-Up Area assists the gradual transition of existing neighbourhoods within the Region into 15-minute neighbourhoods that are compact, well connected places that allow all people of all ages and abilities to access the needs for daily living within 15 minutes by walking, cycling or rolling.

Section 1.6 of the Regional Official Plan establishes the overview of the Regional Planning Framework and Section 2.B.1 and 2.C establish policies for the Urban System. Section 2.F of the Regional Official Plan establishes policies for intensification targets within the Delineated Built-Up Area, which is set at 60 percent annually for the City of Cambridge. The proposed

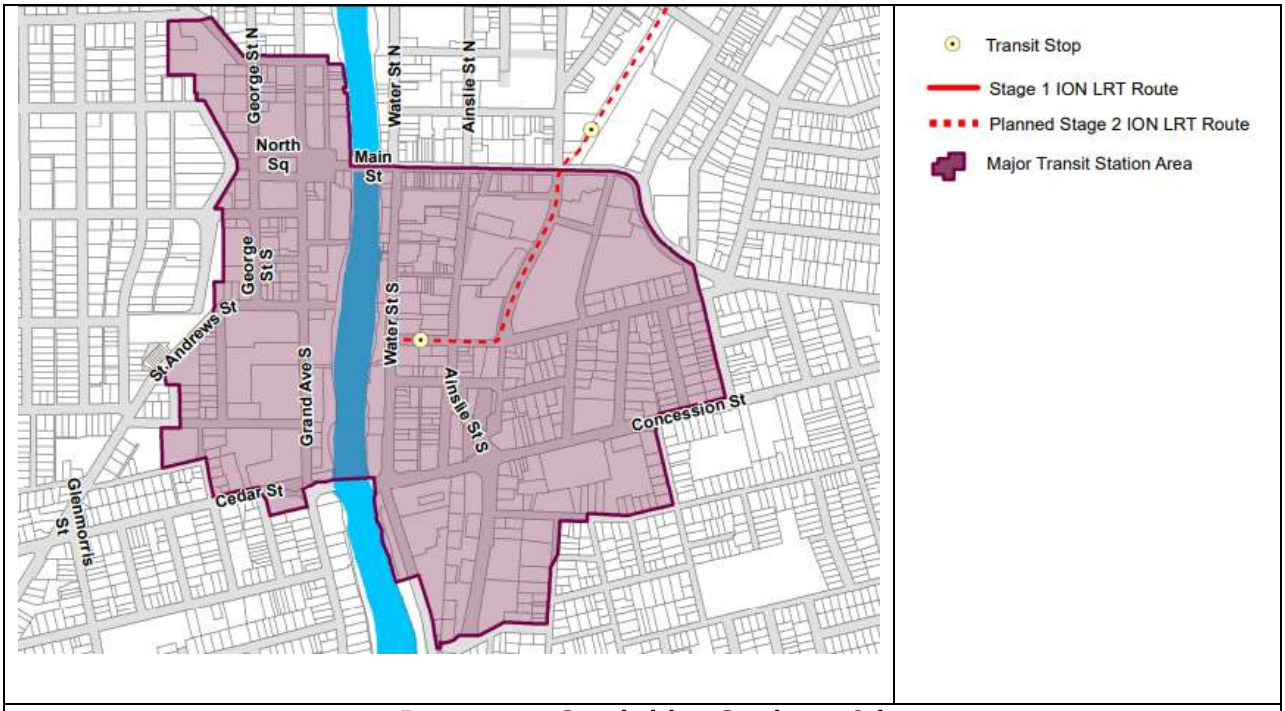
density will contribute to the achievement of Cambridge's intensification target for the Delineated Built-Up Area.



Regional Official Plan - Map 3a Urban Area

Figure 19: Region of Waterloo Official Plan

Regional Council voted to adopt the growth component amendments to the Regional Official Plan in August 2022. The amendment (No. 6) was undertaken to establish the planning framework for accommodating Waterloo Region's forecasted population and employment growth to 2051. Through this process the Subject Property was identified as being within a MTSA as per Map 9d which identifies the lands as being within the Downtown Cambridge Station.



Downtown Cambridge Station – 9d

Figure 20: Region of Waterloo Official Plan Amendment No. 6

The updated policies of ROPA 6 provide the following policy direction:

2.B Urban System

The urban system provides the foundational framework for where and how the Region's cities and townships will accommodate their forecasted population and employment growth to 2051. This system consists of a hierarchy of urban areas, and of supporting nodes and corridors within them, linked together by an integrated, multimodal transportation system that prioritizes walking, cycling, and rolling, and taking transit over automobile trips. The urban system consists of seven key structural components: the Urban Area; Urban Growth Centres; Major Transit Station Areas; Regional Intensification Corridors; Local Centres and Intensification Corridors; Township Urban Areas, and Township Urban Growth Centres.

This section establishes the policies for directing growth and development within the key structural components of the Region's urban system. It also sets out the role of each element in accommodating forecasted growth, and provides direction for a more compact built form that will

enable the region's energy transition off fossil fuels, optimize infrastructure, particularly along transit and transportation corridors to support the achievement of equitable, thriving and sustainable communities.

In addition to these structural components, development in the urban system is further guided by three interrelated land use policy areas: delineated built-up areas; designated greenfield areas; and employment areas. These policy areas provide additional direction for new development within those specific areas.

Over 60 percent of the region's new residential growth will occur within the delineated built-up areas of the cities and townships through intensification. Much of this growth will be directed to a series of strategic growth areas serviced by transit, and the balance will occur in existing neighbourhoods through gentle density and a broader range of missing middle housing options.

Urban Growth Centres and Major Transit Station Areas located along Regional Intensification Corridors will prioritize intensification and higher densities to make efficient use of land and infrastructure and support transit viability. Over time, these areas will gradually connect to and support a broader network of Local Centres and Intensification Corridors, and Township Urban Growth Centres to create a continuous and seamless mobility network focused on walking, cycling, and rolling, and transit. All of these growth areas will make better use of land and infrastructure, and help transition Waterloo Region into an energy-efficient, low-carbon community.

Although most of the Region's future growth will occur in delineated built-up areas through intensification, some new development will also be accommodated within designated greenfield areas. Future development in both of these policy areas will contribute to the creation of 15-minute neighbourhoods with a broad mix of land uses where people can meet their daily needs for goods, services, and employment within a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by using direct, frequent, and convenient transit.

Maintaining a balanced supply of employment lands is fundamental to the region's future business growth and economic prosperity. Accordingly, this Chapter designates a number of employment areas throughout the region and contains policies protecting them for employment uses over the long-term.

Implementing the policies of this Section will provide clarity and greater certainty as to where and how future development should occur.

Objective:

- *Support the development of an efficient and sustainable urban system based on a hierarchy of urban areas, and of supporting nodes and corridors within them, linked together by an integrated, multimodal transportation system that prioritizes walking, cycling and rolling, and taking transit over automobile trips.*

2.B.1 Urban System Policies

2.B.1.1 The Region and the area municipalities will direct the majority of the forecasted population and employment growth in Table 1 to the following key structural components of the Regional urban system:

(a) the Urban Area and Township Urban Areas as shown on Map 1;

(b) strategic growth areas as shown on Map 2, where the highest levels of growth and development will generally be directed based on the following hierarchy;

(i) Downtown Cambridge, Downtown Kitchener, and Uptown Waterloo Urban Growth Centres;

(ii) Major Transit Station Areas;

(iii) Regional Intensification Corridors;

(iv) Local Centres and Intensification Corridors; and

(v) Township Urban Growth Centres

(c) delineated built-up areas as shown on Map 2 outside of strategic growth areas through gentle density and a broader range of missing middle housing options;

(d) designated greenfield areas as shown on Map 2; and

(e) employment areas as shown on Map 3.

2.D Strategic Growth Areas

Strategic growth areas are nodes, corridors and other areas that will accommodate most of the planned intensification in the region. Nodes, including Urban Growth Centres, Major Transit Station Areas, Local Centres, and Township Urban Growth Centres, will be planned as areas of more intense density, use and activity. They are compact clusters of uses that can range in scale and intensity of development, such as the downtown cores of the cities and townships, mixed-use communities, and postsecondary educational campuses or other higher-density uses both large and small.

Corridors, including Regional Intensification Corridors and Local Intensification Corridors, share similar characteristics as nodes, but are oriented along existing or planned frequent transit service or higher order transit routes. They represent key routes between strategic growth areas, creating a continuous and integrated mobility network for walking, cycling, and rolling, and taking transit across the region. Existing corridors will be reinforced through infill and redevelopment, and supported with strategic investments in enhanced transit service and protected infrastructure for walking, cycling and rolling.

Each node and corridor will have its own unique sets of characteristics related to levels of development, ridership patterns or relationship to other areas of activity within a transit system. The highest densities and scale of development will generally be directed toward the Downtown Cambridge, Downtown Kitchener and Uptown Waterloo Urban Growth Centres, followed by a series of 27 Major Transit Station Areas. Regional Intensification Corridors form the backbone on the Region's transit system, including the existing Stage 1 and planned Stage 2 ION light rail transit connecting the core areas of the Cities of Cambridge, Kitchener and Waterloo, and other strategic growth areas located across the region. These corridors will be the focus for new medium and high-density development and make it easier to travel to key destinations across the region without personal automobiles.

Local Centres, Local Intensification Corridors, and Township Urban Growth Centres are generally smaller in scale and scope than Urban Growth Centres, Major Transit Station Areas and Regional Intensification Corridors, but play a strong supporting role in the broader Regional urban system hierarchy. They provide neighbourhood focal points for a range of uses and activities, including missing middle housing, in areas served by existing or planned transit

services. Over time, these areas will enhance connectivity within and between the cities and townships, and help transition existing residential areas into vibrant 15-minute neighbourhoods.

The policies in this Section are grounded in the principle of transit-supportive development. This principle broadly supports the clustering of uses and activities to growth areas that support walking, cycling, and rolling and that have existing or planned transit services. As the density of people and jobs across the region continues to increase, the distances between uses and destinations will gradually decrease over time. This will help realize this Plan's vision to create equitable, thriving and sustainable communities, and achieve other important benefits.

This Plan recognizes the different starting points, local conditions and growth potential of each of the strategic growth areas identified on Map 2. Not all areas will achieve the same mix of uses, or will reach their full development potential at the same time. Initially, some areas may not be able to provide a broad mix of uses, services and higher densities outlined in this Chapter. Over the long-term, however, this Plan envisions that all strategic growth areas will meet or exceed the density targets of this Plan, and create better places for people of all ages and abilities to get to where they want to go by walking, cycling, and rolling, and taking transit, at all times of the year.

Objectives:

- *Focus intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability; and*

- *Align and prioritize planning and investments in infrastructure and public service facilities to support intensification in strategic growth areas*

2.D.2 Major Transit Station Areas Policies

2.D.2.1 Major Transit Station Areas are identified on Map 2 and further delineated on Figures 4a to 9d of this Plan. These station areas identify lands along the Stage 1 and planned Stage 2 ION light rail transit route that are typically located within a 500 to 800 metre radius of the transit stop, representing about a 10-minute walk.

2.D.2.2 Area municipalities will undertake detailed planning and establish official plan policies and zoning by-laws to ensure that Major Transit Station Areas are planned and designed in a manner that:

(a) achieves the minimum density targets set out in Table 2;

(b) is transit-supportive, supports planned transit service levels, and prioritizes access to the station area and connections to any nearby major trip generators by providing:

> *(i) connections to regional and provincial transit services to support transit service integration; and*
>
> *(ii) mobility networks for walking, cycling, and rolling, including sidewalks, bicycle lanes, and secured bicycle parking;*

(c) provides for a diverse mix of uses, including additional residential units and affordable housing, where residential uses are permitted, to support existing and planned transit service levels;

(d) fosters collaboration between public and private sectors, such as joint development projects;

(e) provides alternative development standards, such as reducing or eliminating minimum automobile parking standards, or providing maximum parking standards, for uses near transit routes, to maximize intensification opportunities and minimize surface parking areas;

(f) prohibits land uses and built form that would adversely affect the achievement of the minimum density targets set out in Table 2;

(g) protects existing significant employment uses by ensuring land use compatibility with adjacent new development;

(h) supports the implementation of inclusionary zoning by identifying:

> *(i) the authorized uses of land in the station area and of buildings or structures on lands in the area; and*

(ii) the minimum densities that are authorized with respect to buildings and structures on lands in the station area; and

(i) is consistent with the relevant transit-supportive development policies of Section 2.D.6.

The following table was included as part of ROPA 6 to establish minimum densities for all Major Transit Station Areas.

Table 2
Minimum Densities of Major Transit Station Areas

Major Transit Station Area Name	Location	Minimum Density Targets*
City of Waterloo		
Conestoga	Figure 4a	160
Northfield	Figure 4b	160
Research and Technology	Figure 4c	160
University of Waterloo	Figure 4d	160
Laurier-Waterloo Park	Figure 5a	95
Waterloo Public Square and Willis Way	Figure 5b	160
Allen Street	Figure 5c	160
City of Kitchener		
Grand River Hospital	Figure 5d	160
Central Station	Figure 6a	160
Victoria Park and Kitchener City Hall	Figure 6b	160
Queen plus Frederick	Figure 6c	160
Kitchener Market	Figure 6d	160
Borden	Figure 7a	160
Mill	Figure 7b	160
Block Line	Figure 7c	80
Fairway	Figure 7d	160
Sportsworld	Figure 8a	160
City of Cambridge		
Preston	Figure 8b	160
Pinebush	Figure 8c	160
Cambridge Centre Mall	Figure 8d	160
Can-Amera	Figure 9a	160
Delta	Figure 9b	120
Main	Figure 9c	160
Downtown Cambridge	Figure 9d	160

* Minimum density target is calculated in terms of people and jobs combined per gross hectare measured over the entire station area.

2.D.2.3 The Region will support the implementation of the Major Transit Station Areas policies of this Plan by:

(a) continuing to invest in future enhancements or expansions to the multimodal transportation system that prioritize walking, cycling, and rolling, and taking transit over automobile trips;

(b) participating in area municipal Community Improvement Plans and associated financial incentive programs, and other appropriate implementation tools to facilitate transit-supportive development; and

(c) providing area municipalities with technical expertise and information to help co-ordinate the design of Major Transit Station Areas with the planning of the Grand River Transit bus network, including any future higher order transit corridors, to ensure the creation of a more integrated transit network.

2.D.2.4 Area municipalities are encouraged to plan lands adjacent to or near a Major Transit Station Area to support transit-supportive development, prioritize walking, cycling, and rolling, taking transit over automobile trips, and provide for a broad mix of uses and activities.

2.D.2.5 Area municipalities are encouraged to initiate station area planning for Major Transit Station Areas to:

> *(a) articulate a clear vision for the station area to guide area municipal decision-making in terms of capital expenditures, infrastructure design and community needs;*
>
> *(b) apply industry, Provincial and Regional best practices, design guidelines and development standards to create an urban form that prioritizes walking, cycling, and rolling, and taking transit over automobile travel;*
>
> *(c) provide clear direction to development proponents about appropriate scale and form of building, open space and streets;*
>
> *(d) create the planning and regulatory framework that can be formally adopted by the area municipal Council and integrated into the official plan and zoning by-laws required in Policy 2.D.2.2; and*

(e) identify and implement strategies for automobile dependent areas that enable the transition over time to more transit-supportive places that enable most trips to be made by walking, cycling, and rolling;

2.D.2.6 For the purposes of implementing the use of inclusionary zoning by the area municipalities, all Major Transit Station Areas delineated on Figures 4a to 9d are recognized as Protected Major Transit Station Areas in accordance with Section 16(16) of the Planning Act.

2.D.2.7 The Region will support the use of inclusionary zoning by the area municipalities as a means of requiring affordable housing in Major Transit Station Areas by:

(a) providing technical assistance to area municipalities in establishing and implementing inclusionary zoning policies and by-laws;

(b) collaborating with area municipalities in data sharing, monitoring and reporting on affordable housing acquired through inclusionary zoning, and in conducting reviews and the required updates to Assessment Reports in accordance with Provincial requirements; and,

(c) working together with area municipalities, developers and non-profit organizations on administration to support the long-term affordability of any affordable housing units built in a Major Transit Station Area.

2.D.2.8 None of the policies in Section 2.D should be interpreted to mean that every property located within a Major Transit Station Area identified in this Plan is necessarily appropriate for major intensification. The appropriate scale and form of any development on lands within the boundaries of these areas will be subject to the relevant area municipal planning policies and approval processes.

The Region has also provided clear definitions on the terminology within their Official Plan.

Strategic Growth Areas

Within Urban Areas and Township Urban Areas, nodes, corridors, and other areas that have been identified by the Region, area municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.

Strategic growth areas include Urban Growth Centres, Major Transit Station Areas, Regional Corridors, Local Corridors and Centres, Township Urban Growth Centres, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields

Intensification

The development of a property, site or area at a higher density than currently exists through:

(a) redevelopment, including the reuse of brownfield sites;

(b) the development of vacant and/or underutilized lots within previously developed areas;

(c) infill development; and

(d) the expansion or conversion of existing buildings. (PPS 2020)

Major Transit Station Area

The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.

The Subject Property is located within the Galt City Centre Floodplain Special Policy Area which is directed by the following policies:

7.H.6 Where a special policy area has been approved by the Province, the affected Area Municipality will designate the special policy area and establish appropriate policies in its official plan. Any change or modification to the policies or boundaries applying to the special policy area must be approved by the Province prior to the approval of any official plan amendment or zone change application implementing such changes or modifications

7.H.8 Notwithstanding Policy 7.H.7, development or site alteration may be permitted in hazardous lands and hazardous sites where;

(a) a special policy area has been approved by the Province; or

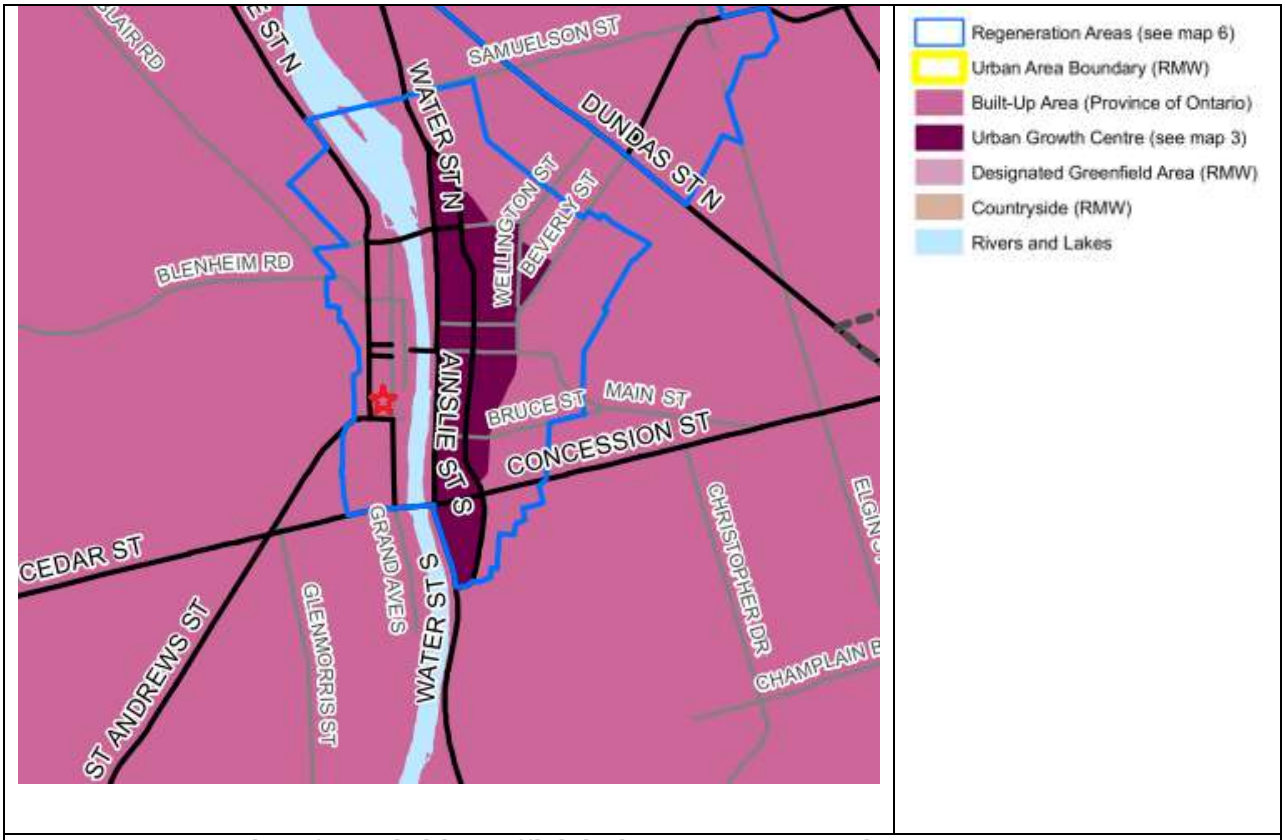
(b) the development is limited to land uses that, by their nature, must locate within the floodway, including flood and/or erosion control works, structures necessary for conservation, water supply, wastewater management, or minor additions or passive non-structural uses which do not affect flood flows; or

7.H.11 Area Municipalities will include policies in their official plans to require detailed hydrogeological and/or geotechnical studies to assess potential risks to persons, buildings, structures, or public infrastructure occasioned by groundwater discharge or high water tables prior to development. Such studies should demonstrate that engineering solutions designed to protect structures from the effects of groundwater discharge and high water tables will be effective, will not require significant on-going maintenance to remain effective, and will not divert or impede natural groundwater flows so as to create hazards or annoyances to adjacent lands and buildings. Discharge Constraint Areas should be identified in community plans and/or the Area Municipal official plan where they have been identified.

5.4 CITY OF CAMBRIDGE OFFICIAL PLAN

The City of Cambridge Official Plan (the "COP") was adopted by City of Cambridge Council on May 7, 2012 and subsequently approved by the Region of Waterloo on November 21, 2012. The COP has not been updated to reflect the PPS 2024 or the amendments applicable through the Regional Official Plan Amendment No. 6. The policies of the Official Plan can therefore be considered outdated with regard to the Major Transit Station Area designation that now applies to the lands and the intension for intensification that spurs from that classification. The Downtown Cambridge MTSA clearly calls for a minimum density of 160 people and jobs over a gross hectare. City of Cambridge policies currently contradict this higher level direction.

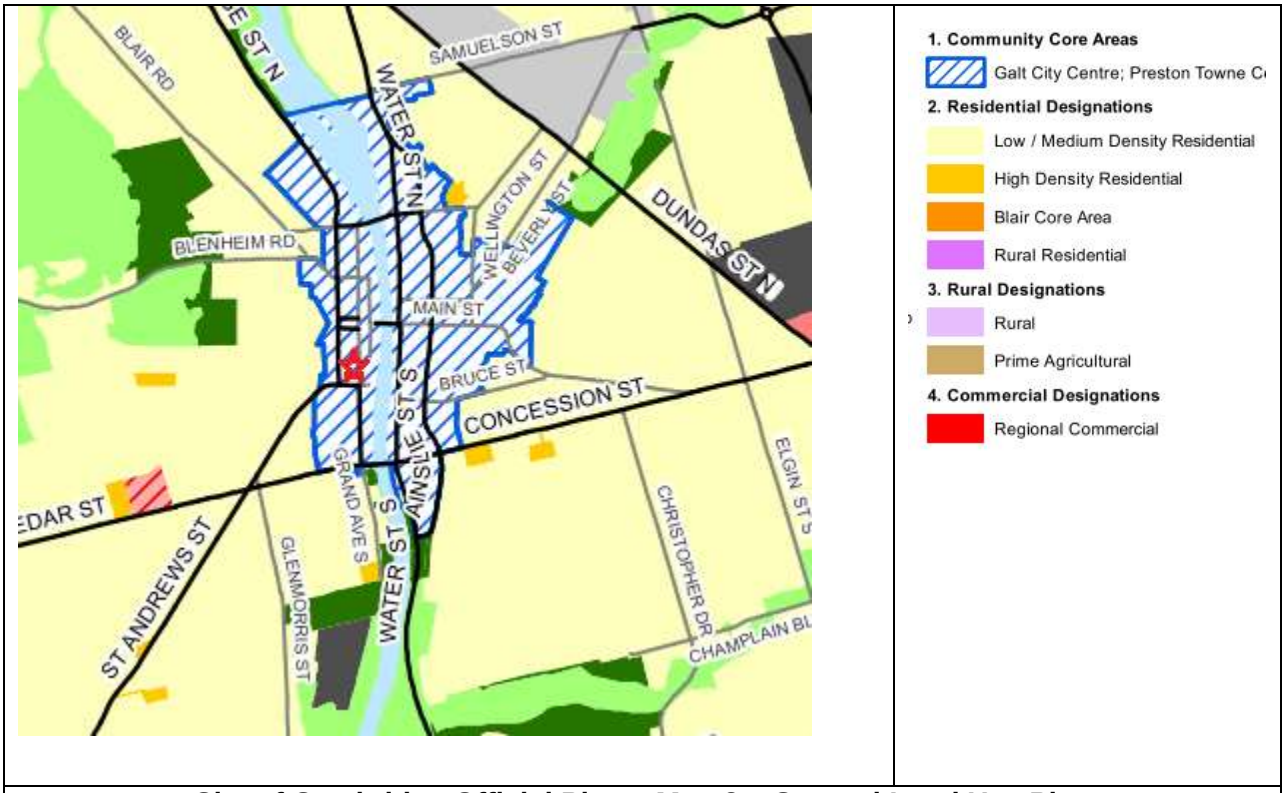
The Subject Property is identified as being within the "Built-Up" Area and within a "Regeneration Area" on Map 1A – Urban Structure of the City of Cambridge.



City of Cambridge Official Plan – Map 1A – Urban Structure

Figure 21: City of Cambridge Official Plan

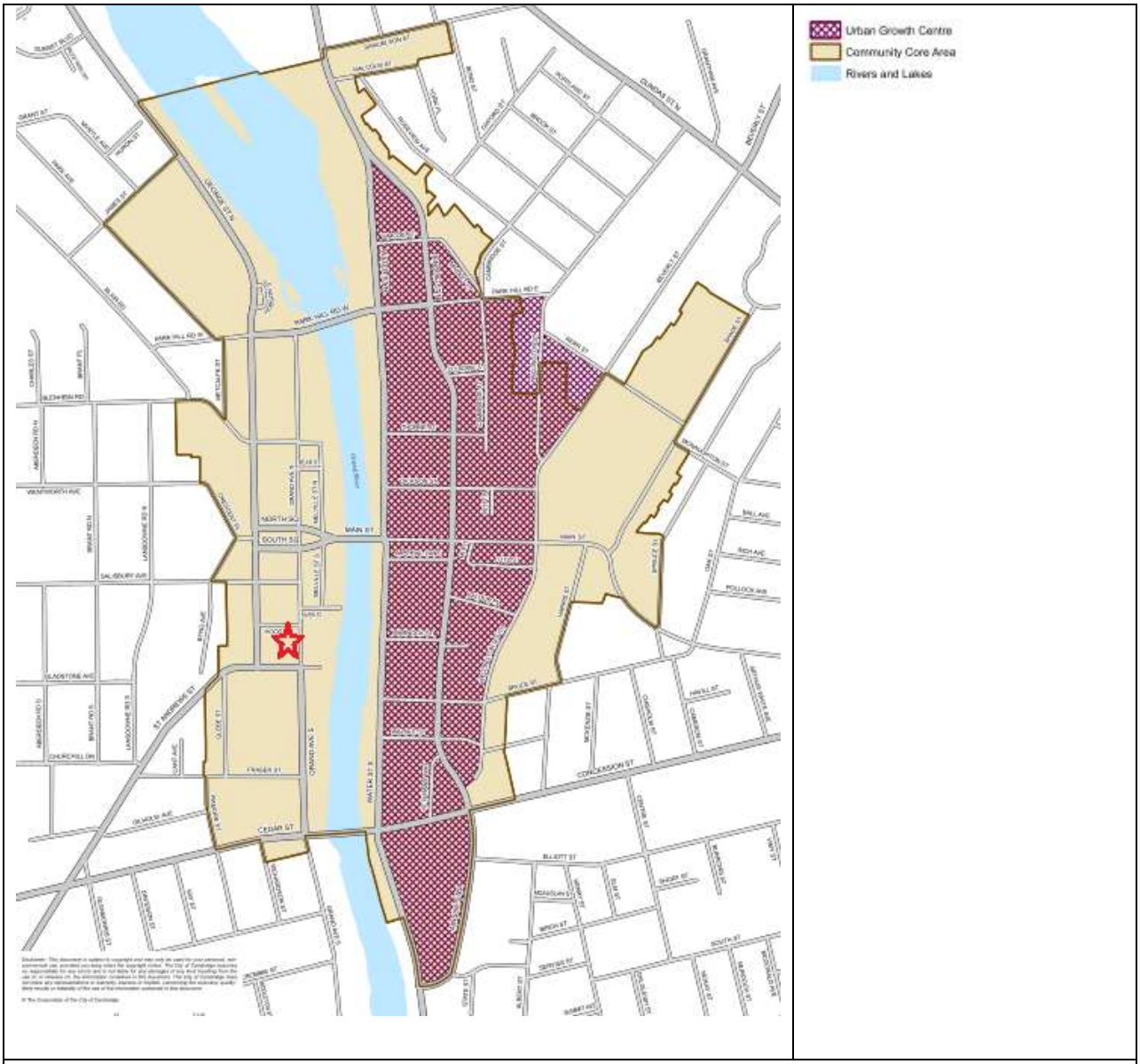
On Map 2 – General Land Use Plan the Subject Property is designated as being within the Galt City Centre Community Core Area.



City of Cambridge Official Plan – Map 2 – General Land Use Plan

Figure 22: City of Cambridge Official Plan

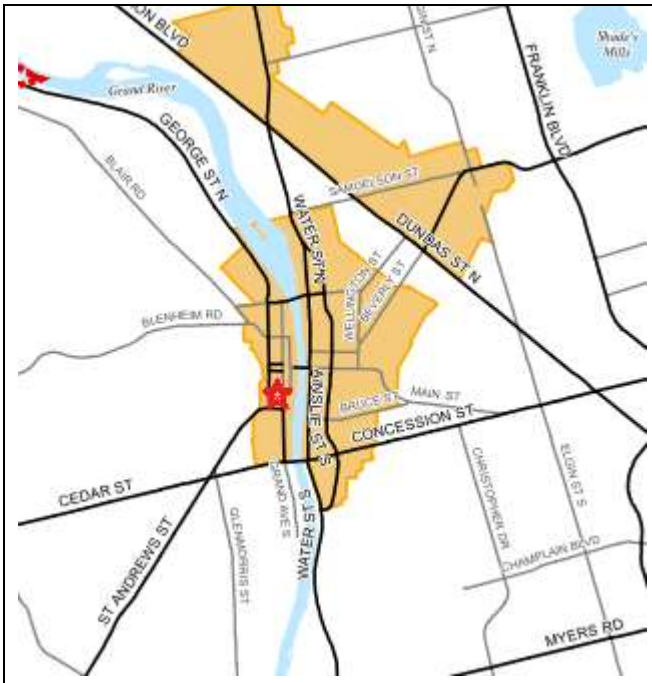
On Map 3, the Galt City Centre limits are clearly defined and the Subject Property is designated as “Community Core Area” with frontage onto City of Cambridge roadways (Hood Street and Grand Avenue South)

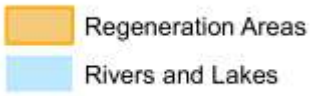


City of Cambridge Official Plan – Map 3 – Galt City Centre

Figure 23: City of Cambridge Official Plan

Map 6 confirms the lands are within a “Regeneration Area”

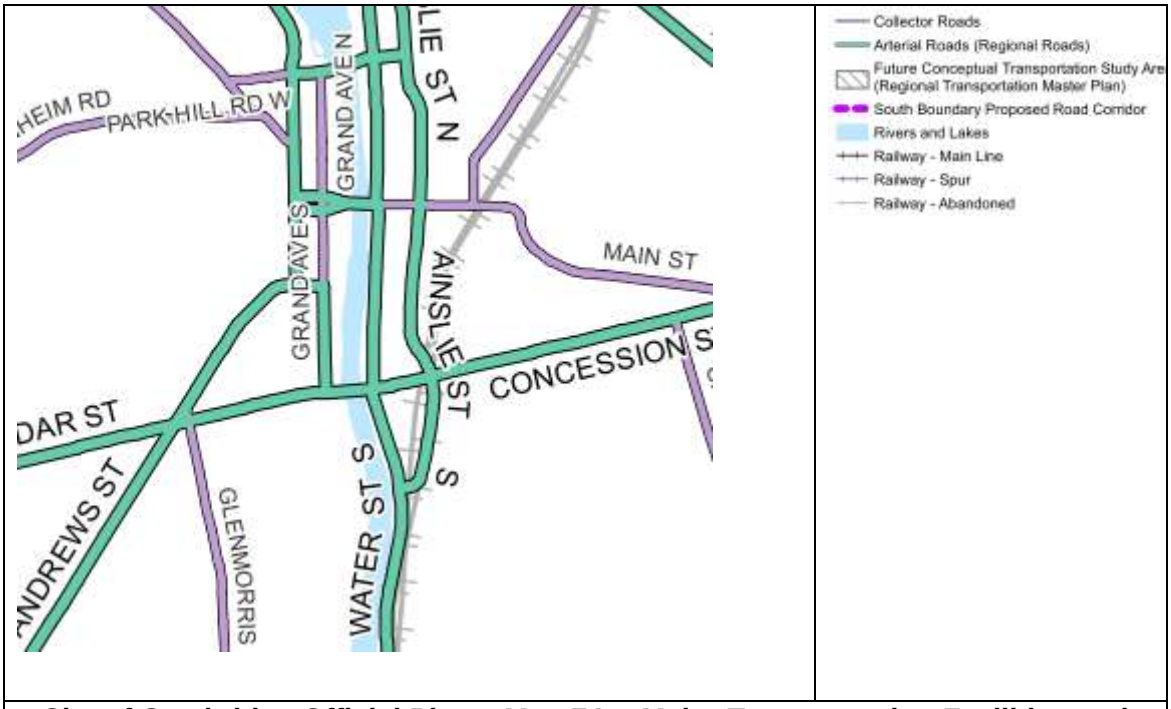




City of Cambridge Official Plan – Map 6 – Regeneration Areas

Figure 24: City of Cambridge Official Plan

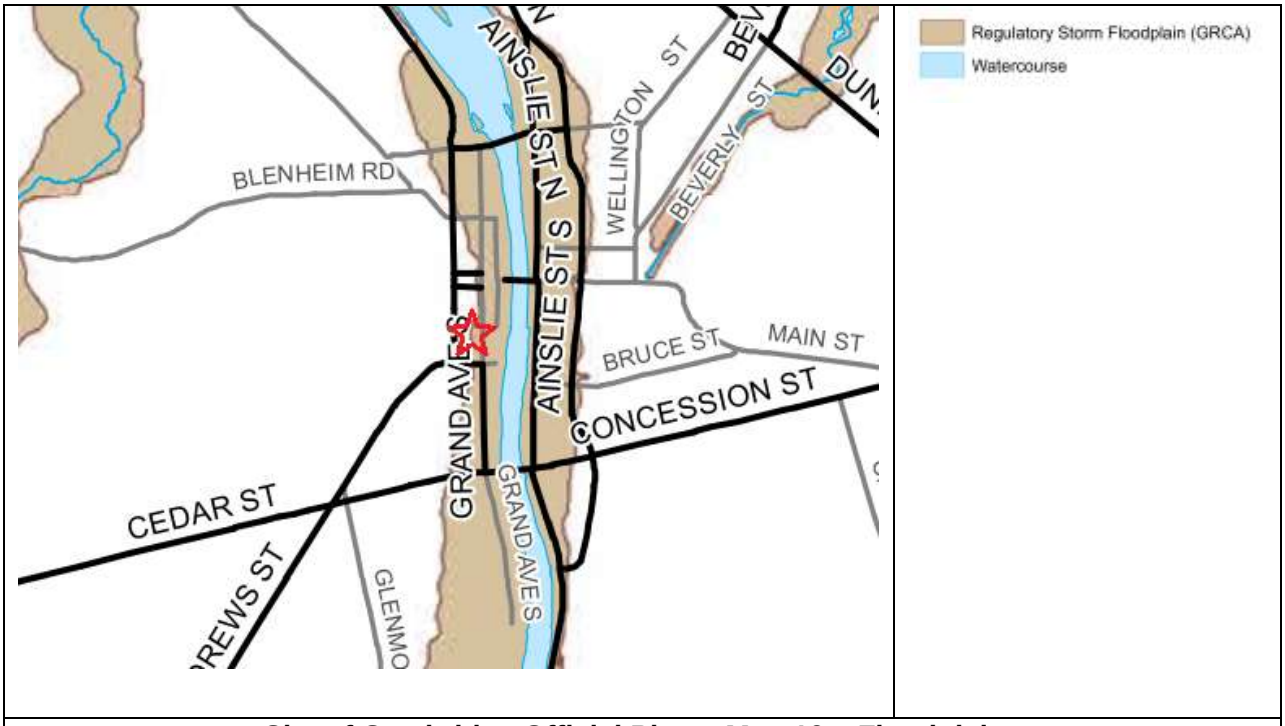
Map 7A confirms that Grand Avenue South at this location is a "Collector Road" owned and maintained by the City of Cambridge.



City of Cambridge Official Plan – Map 7A – Major Transportation Facilities and Hydro Corridors

Figure 25: City of Cambridge Official Plan

Map 10 of the Official Plan indicates the lands may be impacted by the Regulatory Storm Floodplain (GRCA).



City of Cambridge Official Plan – Map 10 – Floodplains

Figure 26: City of Cambridge Official Plan

Map 12 identifies that the Subject Property is subject to the Regulatory Storm Floodplain (GRCA) and is within the Galt City Centre Floodplain Special Policy Area (GRCA)'

City of Cambridge Official Plan – Map 12 – Galt City Centre Floodplain Special Policy Area

Figure 27: City of Cambridge Official Plan

Section 2.2 contains the Objectives of the Official Plan as follows:

2.2 Objectives The following objectives provide a foundation for the growth management policies of this Plan:

a) to plan for a moderate and environmentally sustainable level of growth in the City of Cambridge to a forecast population of 176,000 and employment of 102,500 jobs by the year 2031;

b) to encourage balanced growth between residential and employment uses;

c) to direct and encourage new development within the built-up area of the city where appropriate to accommodate projected population and employment growth;

d) to plan new growth areas within the designated greenfield area as complete communities;

e) to support a balanced approach to growth in which the focus for new development will increasingly be shifted from greenfield areas to intensification within the built-up area;

f) to plan for compact urban development that maintains a balanced land supply, including residential, employment and commercial uses, and promotes mixed use, transit oriented development;

g) to encourage the continued development of the Galt City Centre, Preston Towne Centre and Hespeler Village as Community Core Areas of higher intensity and mix of land uses, promoting such elements as mixed use buildings, intensification, heritage conservation, social facilities, the reuse of existing buildings and infrastructure renewal;

h) to identify and promote areas for intensified, mixed use activities generally serving more localized functions;

i) to encourage the development of a range of existing and proposed corridors in this Plan to serve as key transportation linkages with areas both within and outside the city, including roads, rail lines, rivers, and cycling and pedestrian routes. One of the corridors will delineate the general alignment of the rapid transit system linking Cambridge with Kitchener and Waterloo. Stage 1 of the rapid transit system within the portion of the corridor located between the Ainslie Street Terminal in Cambridge and the Fairview Park Mall in Kitchener will use adapted bus rapid transit (aBRT) technology. Stage 2 provides the opportunity for the aBRT technology to be converted to light rapid transit (LRT) technology when funding is available and/or when warranted by ridership;

j) to provide for the development of new neighbourhoods which, through the use of sensitive urban design, are safe, attractive, pedestrian friendly, integrated with the natural heritage system, existing built areas and supporting facilities and services; and are readily linked by nearby travel routes to other areas of the city;

k) to support the city's urban structure with adequate infrastructure, including transportation routes, public transit, fire protection, water, sewage treatment, stormwater management and other public services and community facilities;

l) to promote the principles of conservation and sustainability, including; the efficient use of energy and water; the intensification of development in the builtup area, and the protection, enhancement or, wherever feasible and appropriate, restoration of the natural environment and cultural heritage resources; and

m) to protect the city's prime agricultural areas from urban development.

The policies for the "Built-up Area" are contained within Section 2.6.1

2.6.1 Intensification within the Built-up Area

1. Future development within the City of Cambridge built-up area will contribute to meeting or exceeding the Regional reurbanization target. By the year 2015 and for each year thereafter, a minimum of 45% of all residential development will occur within the built-up area of the region as a whole. The City in collaboration with the Region will monitor development within the built-up area.

2. Intensification is encouraged throughout the built-up area of Cambridge, particularly within the following areas:

a) The Urban Growth Centre (identified on Maps 1A and 3);

b) Community Core Areas (identified on Maps 1A, 3, 4 and 5);

c) Nodes (identified on Figures 1-4);

d) Regeneration Areas (identified on Maps 1A and 6);

e) Reurbanization Corridors in accordance with Section 2.6.5; and

f) Major Transit Station Areas in accordance with Section 2.6.6

3. These areas for intensification are intended to attract a significant portion of future population and employment growth.

4. The appropriate type and scale of development within the areas identified for intensification in Policy 2.6.1.2 may be determined through Community Plans, Secondary Plans and/or other supporting studies.

5. The City, in collaboration with the Region will, where appropriate, establish minimum density targets for intensification consistent with existing or planned transit service levels.

6. Intensification within the built-up area will be planned and designed to:

a) support vibrant neighbourhoods through the inclusion of a diverse and compatible mix of land uses, including residential and employment uses;

b) provide for a range and mix of housing that takes into account affordable housing needs;

c) incorporate high quality public open spaces;

d) support walking, cycling and transit;

e) support the cultural heritage of the area;

f) generally achieve higher densities than surrounding areas; and

g) ensure an appropriate transition of built form to adjacent areas; and

h) maintain, enhance or wherever feasible and appropriate, restore the natural environment.

7. The development of land or existing buildings in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and Major Transit Station Areas is encouraged for mixed uses such as residential with office, commercial, and business uses. The City may provide support for mixed use development by:

a) providing incentives such as reductions in the parking requirements for the residential component of mixed use projects; and

b) requiring and assisting where appropriate with the remediation of contaminated sites.

8. Infill, intensification and redevelopment within existing neighbourhoods will be minor in nature and will be designed to respect existing character and provide connections and linkages where possible.

9. Greyfield and brownfield sites will be revitalized through intensification, redevelopment and/or the adaptive reuse of existing buildings in accordance with the policies of this Plan.

Section 2.6.3 provides the policy direction for Community Core Areas.

2.6.3 Community Core Areas

1. The Community Core Areas are historical central business centres in the city with specialized and diverse planned functions. Supporting the complete communities concept, these areas are planned to provide a wide variety of mixed uses including a range of housing, specialized commercial uses, office uses including major offices, institutional and community facilities, and the cultural hubs for the city.

2. The Community Core Areas are designated on Maps 2, 3, 4 and 5. Community Core Areas are those areas which contain or will be planned to contain the following features and functions:

a) their historical role as traditional community focal points;

b) a mix of residential, employment and institutional uses which enable people to live and work in close proximity;

c) enhanced transportation opportunities for pedestrians, cyclists and transit users;

d) development and land use patterns supportive of transit service;

e) a range of housing types and transit oriented development;

f) conservation and preservation of cultural heritage resources;

g) integration of the Grand River and its tributaries as a multi-purpose resource, recognizing its designation as a Canadian Heritage River;

h) opportunities for unique experiences, such as cultural events, recreation, and specialty shopping and dining, in support of tourism and other functions;

i) maintenance, enhancement or wherever feasible and appropriate, restoration of the natural environment; and

j) approved Community Improvement Areas giving high priority to the location and upgrading of municipal services and facilities in the Community Core Areas.

3. The City will recognize and encourage the use of the Community Core Areas as:

a) areas which offer residential, employment, institutional, commercial, open space and cultural uses and activities;

b) specialized shopping areas, providing goods and services to customers within and outside of Cambridge;

c) areas of concentrated and mixed land uses which requires the application of such key elements of urban design, cultural heritage resources, natural environment conservation, a well-linked transit oriented and pedestrian transportation network, and development that is designed to reflect the character of the area and the concept of complete communities;

d) areas which benefit from the preservation of historic buildings, including their adaptive re-use;

e) areas which benefit from appropriate active and passive use of the natural environment, including the Grand and Speed Rivers and their shorelines;

f) tourist-oriented areas, including shopping, integrated trail systems, cultural events, scenic features, and water access along the Grand and Speed Rivers;

g) concentrated, mixed use areas which support the neighbourhoods that have developed around them; and

h) locations where residents can access local food through farmers' markets.

4. In addition to policies contained in 2.6.3.3, the Galt City Centre:

a) is recognized as the Downtown of Cambridge;

b) is the City's designated Urban Growth Centre in accordance with Provincial legislation;

c) contains the Civic Square; and

d) is the hub for Regional transit in Cambridge

5. The City will provide for the integration of development in the Community Core Areas in a manner which has a compact form and is compatible with existing or permitted uses, other

proposed development, and which prioritizes transit oriented and pedestrian linkages throughout the area. All such development in the Community Core Areas will be subject to the Urban Design and Compatibility policies of this Plan.

2.7.3 Regeneration Areas

1. Regeneration Areas are areas within the city where a transition of use from one use, such as industrial to another use is anticipated during the planning horizon of this Plan. Regeneration Areas are identified on Maps 1A and 6.

2. Regeneration Areas will be the subject of planning studies to determine appropriate land use designations. Until appropriate Official Plan amendments are in effect, permitted uses are deemed to conform to this Official Plan.

3. For the purposes of Policy 2.7.2.1, Regeneration Areas are not considered to be employment areas. Applications for official plan amendments to expand the range of uses from industrial to other appropriate land use designations for sites within the Regeneration Areas will be considered in accordance with the policies of this Plan.

2.8 Residential Lands

The City will:

a) encourage the development of a wide a range of housing unit types to accommodate the needs, preferences and economic resources of the city's households;

b) promote and maintain an adequate supply of both ownership and rental housing stock;

c) promote the use of compatible urban design

d) establish residential densities which are both appropriate to existing and new neighbourhoods and result in the compact development of the city's residential lands;

e) promote balanced residential intensification including individual lot intensification that is compatible with existing and permitted uses on neighbouring properties, as well as any other key natural and cultural heritage resources;

f) pursue housing rehabilitation as a means of increasing the life of the existing housing stock;

g) recognize the unique needs of persons in special circumstances with respect to income, social or physical limitations or other barriers, and who, without intervention, might not have adequate housing;

h) maintain an adequate supply of land for residential development;

i) provide opportunities for affordable housing;

j) support mixed use and multi-unit residential developments; and

k) require development to include pedestrian, cycling and vehicular movement, other modes of transportation and linkages and access where applicable to public transit.

2.8.2 Range and Mix of Housing Types

1. The City will plan for a range and mix of housing that is affordable, accessible, and safe incorporating Crime Prevention Through Environmental Design principles, and will accommodate the varying needs, abilities and economic resources of Cambridge residents.

2. The City will encourage developers to make housing accessible and adaptable to people with disabilities and may require that a proportion of dwellings in residential developments and redevelopments be accessible and adaptable to people with disabilities, generally in keeping with the proportion such people represent in the City of Cambridge and in accordance with the Accessibility for Ontarian's Disability Act.

3. The City will ensure the creation of 45% of new housing units through infill, conversion, intensification and the redevelopment of built-up areas of the City, particularly in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and Major Transit Station Areas.

4. The City may allow for appropriate reductions in off-street parking requirements associated with the residential component of mixed use developments, to reflect the opportunities for the shared use of the parking spaces and in proximity to Major Transit Station Areas.

5. The City will encourage the inclusion of a compatible residential component in the development of commercial projects in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, Major Transit Station Areas, or in residential communities.

6. The City will promote the maintenance of an adequate supply of both ownership and rental housing stock to meet the varying needs of City residents by:

a) encouraging residential intensification and the development of multi-unit residential development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and Major Transit Station Areas;

b) providing opportunities for the development of smaller lot single and semidetached dwellings, plexes, townhouses and apartments; and

c) encouraging the construction of affordable rental and ownership housing, including community housing.

7. The City will encourage individual lot intensification, through the creation of a secondary residential unit in a dwelling throughout the Urban Area where appropriate, or garden suite subject to compatibility criteria in Section 8.4.2.

2.8.3 Residential Densities

1. The City will allow compatible higher density residential development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, Major Transit Station Areas and high density residential designations to support and ensure viability of existing and planned transit service levels.

2. The City encourages compatible higher density development on sites where such development will result in the preservation of significant natural or cultural heritage resources.

3. The following are the City's minimum and maximum residential densities and heights in specified areas. Residential densities in residential designations are subject to Policy 8.4.6.3

Table 3: Minimum and Maximum Residential Densities and Heights
FSI – Floor Space Index (see glossary for graphic depiction)

AREA	MINIMUM		MAXIMUM	
	Density	Height	Density	Height including above ground parking structures
Urban Growth Centre subject to a gross density as prescribed in section 2.6.2	0.75 FSI	2 storeys	2.5 FSI	5 storeys
Galt City Centre outside *Urban Growth Centre*	0.5 FSI	2 storeys	2.0 FSI	5 storeys
Preston Towne Centre and Hespeler Village	0.5 FSI	2 storeys	2.0 FSI	5 storeys
Nodes (*Designated Greenfield Area)*	0.5 FSI	4 storeys	2.5 FSI	15 storeys
Nodes (*Built up Area)*	0.5 FSI	4 storeys	2.0 FSI	12 storeys
Regeneration Areas	0.5 FSI	2 storeys	2.0 FSI	8 storeys
Reurbanization Corridors	0.5 FSI	2 storeys	2.0 FSI	8 storeys

4. Notwithstanding Policy 2.8.3.3 the City may permit a higher maximum height and/or density, without amending this Plan through the height and density bonusing provisions in Section 10.16.

5. The City will prepare a height and density massing study to assist in addressing height and density bonusing opportunities.

6. Notwithstanding Policy 2.8.3.3 the City may permit a lower minimum density, without amending this Plan, in the Preston Towne Centre, Hespeler Village, Nodes, Regeneration Areas or Reurbanization Corridors where an evaluation of all possible alternatives is undertaken and the lower density is warranted by more than one of the following criteria:

a) the nature of the soils, topography, geomorphology, vegetation or other environmental features of the lands proposed for development;

b) the established character of the neighbourhood in which the lands proposed for development are located;

c) the unreasonably high cost of providing and/or upgrading required infrastructure such as water supply, sewage disposal, stormwater drainage or access road facilities;

d) the potential negative impact of the proposed development on adjoining natural features; and/or

e) the potential negative impact of the proposed development on cultural heritage resources.

7. Where a proponent is proposing to develop more than one building on a site the proponent may increase the density and/or height of one or more buildings provided the average density and height on the site does not exceed the maximum allowable in Policy 2.8.3.3.

8. Notwithstanding Policy 2.8.3.3 the City may permit a lower minimum density for infilling lot severances, without amending this Plan.

9. Residential lands in Designated Greenfield Areas will be planned and designed to achieve a density target of not less than 55 persons and jobs combined per hectare on lands subject to a plan of subdivision application after June 16, 2006.

3.B.6.1.1 Floodplains General

1. Major floodplains, defined by the Regulatory Flood as identified and approved by the GRCA, are shown conceptually on Map 10 of this Plan. The precise delineation of the floodplain is determined by the GRCA or through subwatershed studies. This precise delineation does not require amendment to this Plan.

2. The floodplain within Cambridge, as shown on Maps 10, 11, and 12 of this Plan, consists of One-Zone, Two-Zone and Special Floodplain Policy Areas. In One-Zone Floodplain Policy Areas shown on Map 10 of this Plan, development is prohibited or restricted in the entire floodplain. In Two-Zone Floodplain Policy Areas shown on Map 11 of this Plan, the floodplain is divided into two zones, the floodway and the flood fringe. Development may be permitted in the flood fringe provided appropriate floodproofing measures are undertaken. The Galt City Centre

Floodplain Special Policy Area shown on Map 12 of this Plan recognizes the need to allow limited development and redevelopment1 in the floodway to maintain a Community Core Area.

3. Certain activities, including the construction of new public roads, or new structures necessary for conservation, public recreation, water supply, wastewater management, stormwater management, utility or agricultural purposes may be permitted, subject to the approval of the GRCA, within the floodplain in a One-Zone Policy Area or the floodway in a Two-Zone Policy Area.

4. Development or redevelopment is prohibited within the floodplain that is associated with:

> *a) the manufacturing, use or storage of hazardous or toxic substances which would pose an unacceptable threat to public safety if damaged as a result of flooding or failure of flood protection measures;*
>
> *b) institutional uses, such as hospitals, nursing homes, day care establishments, group homes and schools, which would pose a significant threat to the safety of the inhabitants if involved in an emergency evacuation situation as a result of flooding or failure of flood protection measures, except as provided in Policy 3.B.6.1.22 f); and*
>
> *c) emergency services such as police, fire and ambulance stations and electrical and telephone substations, which would be impaired during a flood emergency as a result of flooding or failure of flood protection measures.*

Galt City Centre Floodplain Special Policy Area

20. Regulatory Flood Elevation and Regulatory Flood for the purposes of the Galt City Centre Floodplain Special Policy Area designated on Map 12 of this Plan means the level of flooding which has been calculated by the GRCA and used as the basis for the design of the City of Cambridge Dyking and Channelization Scheme and describes the flood level in a storm where flood waters would flow at a rate of 2364 m3 per second as measured through this Special Policy Area.

21. Any change or modification to the policies or boundaries applying to the Galt City Centre Floodplain Special Policy Area designated on Map 12 of this Plan must be approved by the

Province prior to the approval of any official plan amendment or zone change application implementing such changes or modifications.

22. Development and redevelopment1 of lands in the Galt City Centre Floodplain Special Policy Area designated on Map 12 of this Plan are regulated in order to provide adequate flood protection from the Grand River in the Galt City Centre and adjacent areas. Development or redevelopment1 may be permitted in the Galt City Centre Floodplain Special Policy Area provided that the following conditions are met:

a) minor additions or alterations to existing residential buildings of habitable rooms shall be at or above the elevation of the existing first floor space;

b) flood protection construction techniques shall be applied to all new development or redevelopment1 below the Regulatory Flood elevation and shall be designed and constructed to the satisfaction of the City and the GRCA;

c) any new building or major addition or alteration proposed to have any window, door or other similar opening lower than the level of the Regulatory Flood elevation shall be protected to the Regulatory Flood elevation using techniques satisfactory to the City and the GRCA. No new habitable room shall be provided lower than the Regulatory Flood elevation;

d) new utilities shall be located higher than the level of the Regulatory Flood elevation where practical; but, where this is not possible, such utilities shall be floodproofed using techniques satisfactory to the City and the GRCA;

e) any renovation or rehabilitation proposed for an existing building shall not be required to replace existing windows or doors using flood protection techniques or provide special treatment for other similar openings. However, where a comprehensive renovation is proposed for an existing structure and the renovations include the replacement of windows and doors, such replacements shall be floodproofed to withstand the anticipated pressure from flood depths where feasible. Where new openings are proposed for an existing structure or for an addition to an existing structure, such openings shall also be floodproofed to withstand the anticipated pressure from flood depths;

f) new development that is associated with institutional services such as hospitals, nursing homes and schools shall only be permitted to locate on lands in the Galt City Centre Floodplain Special Policy Area which would be flooded to a depth of one metre or less in the event of a Regulatory Flood flow provided that adequate protection to the Regulatory Flood elevation and a dry land access to the building are provided;

g) within the Galt City Centre Floodplain Special Policy Area, service stations, gas bars and other new uses involving the manufacture, disposal, consumption or bulk storage of chemical, flammable, explosive, toxic, corrosive or other dangerous materials shall not be permitted; and

h) the construction of new permanent buildings or structures and the reconstruction or major renovation of existing permanent buildings and structures will be permitted on lands located between the east limit of Grand Avenue/Tower Drive and the west limit of Water Street, from Parkhill Road on the north to Birch Street on the south, only where the design of such buildings or structures complies fully with the standards established for the City of Cambridge Dyking and Channelization Scheme and provides specifically for the integration of such buildings and structures into the flood control and protection works described in that scheme.

8.3 Community Core Areas Designations

1. The Community Core Areas as designated on Maps 2, 3, 4, and 5 may be developed and used for a concentration of mixed uses in conformity with the provisions of this Plan, including:

a) government services, public services and facilities;

b) commercial and retail (excluding adult entertainment establishments);

c) major offices and offices;

d) institutional, recreational, social and cultural facilities; e) notwithstanding Policy 2.6.3.2

e), in cases where residential uses occur or are proposed to occur in conjunction with commercial uses, the residential uses will not be permitted in the street level, storefront portion of a multi-storey, mixed use building; and

f) bed and breakfast establishments.

2. In order to encourage the development of the Community Core Areas in compact forms, the City may exempt a development from providing all or a portion of private offstreet parking facilities where such parking is not required or adequate alternative parking facilities are or will be made available.

8.4.2 Residential Compatibility

1. The City will encourage development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors, Major Transit Station Areas and in residential communities which is compatible with the location, density and other characteristics of neighbouring land uses. Factors to be taken into consideration in assessing the compatibility of development include:

a) the density, scale, height, massing, visual impact, building materials, orientation and architectural character of neighbouring buildings and the proposed development;

b) the conservation, protection, maintenance and potential enhancement of the natural environment and cultural heritage resources;

c) the continued viability of neighbouring land uses;

d) pedestrian and vehicular movement and linkages, as well as parking requirements and design in both existing development and proposed developments;

e) landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of existing development and proposed developments;

f) noise attenuation;

g) odour, dust, and emission impacts;

h) transportation implications; and

i) transitions between different land uses and between sites having varying permitted uses.

2. 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) maintaining 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.

3. The location and massing of new buildings in the residential designations must be compatible with the surrounding land use. The City will require sites to be designed with transition between areas of different intensity and scale

8.4.3 Location Criteria for Multi-Unit Residential Development

The City will encourage the use of lands in residential designations, Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas, Reurbanization Corridors and Major Transit Station Areas to provide sufficient units in multi-unit residential development to meet the policies in Section 2.8.2 of this Plan. In these circumstances, multi-unit residential development may occur without an amendment to this Plan provided the compatibility criteria in Section 8.4.2 are addressed. The City may facilitate or encourage the development of lands for multi-unit

residential development where a site proposed for such development meets the following criteria:

a) is located on an arterial or collector road, or is directly accessible to any such road through the local road network where it is not likely to generate sufficient traffic to disturb the peaceful and quiet enjoyment of neighbouring residential properties located on such local access road;

b) is conveniently located within reasonable distance of public transit, recreational open space and shopping facilities and, if the building is proposed to be designed for occupancy by households with children, is also located within convenient walking distance of an elementary school;

c) has a suitable size and configuration to:

i) permit the separation or appropriate integration of on-site vehicular and pedestrian traffic;

ii) provide for adequate access and circulation by emergency vehicles;

iii) provide adequate on-site landscaping to: establish suitable outdoor amenities and recreational facilities for the building's occupants; screen parking areas; and provide effective buffering and screening to ensure the privacy of outdoor recreational areas on the site as well as on adjoining properties;

iv) provide adequate grading and stormwater management features to ensure the drainage of surface waters to on-site stormwater management facilities or to public storm drainage facilities and not to adjoining properties;

d) is proposed to be developed in such a manner and at such a scale that the site and building design, building height, setbacks, landscaping and vehicular circulation will ensure the proposed development is compatible with existing development on adjoining lands, as outlined in Section 8.4.2 of this Plan; and

e) will include wherever possible the preservation and protection of the natural environment and cultural heritage resources.

Chapter 6 provides the policy direction for Transportation and Infrastructure

6.1 Objectives

The following objectives provide a foundation for the transportation and infrastructure policies of this Plan to:

a) provide, in partnership with the Province and Region, a safe, sustainable, effective, accessible and energy efficient transportation system, using a wide range of travel modes to move people and goods;

b) reduce dependence on the automobile by increasing the number of people using public transit, walking and cycling;

c) protect rail corridors to allow for the provision of improved passenger and freight rail service;

d) encourage the appropriate land use for discontinued rail corridors;

e) work with the Region to ensure that there is capacity in the water and wastewater system to accommodate new development in the urban area before allowing it to proceed; and

f) allocate capacity available within the water and wastewater system in a manner which will allow the City, in co-operation with the Region, to meet the targets established in this Plan, which are in conformity with the Provincial Growth Plan and Regional Official Plan.

Section 6 of the COP provides policies for Transportation and Infrastructure. Policy 6.10.2 states the following:

2. In accordance with the approved Regional Official Plan, Regional Transportation Master Plan and Provincial initiatives the City will support transit supportive densities in the following areas, to assist in strengthening the public transit system including:

a) Urban Growth Centre;

b) Community Core Areas;

c) Nodes; d) Regeneration Areas;

e) Reurbanization Corridors; and

f) Major Transit Station Areas.

Policy 6.10.5 speaks to:

5. The City will encourage higher density development along existing and planned high frequency transit routes, in accordance with the Provincial Growth Plan, when reviewing development proposals if appropriate. Council may introduce transit priority measures to increase the efficiency of transit, including bus only lanes, traffic signal priority, and bus activated signals.

6.0 Grand River Conservation Authority Regulated Area

A portion of the Subject Property is located within the Regional Storm floodplain of the Grand River. As such, any new development or site alteration on the Subject Property will require a GRCA permit. The Ministry of Municipal Affairs and Housing and the Ministry of Natural Resources and Forestry may become involved in reviewing these applications where modifications to Official Plan policies are proposed.

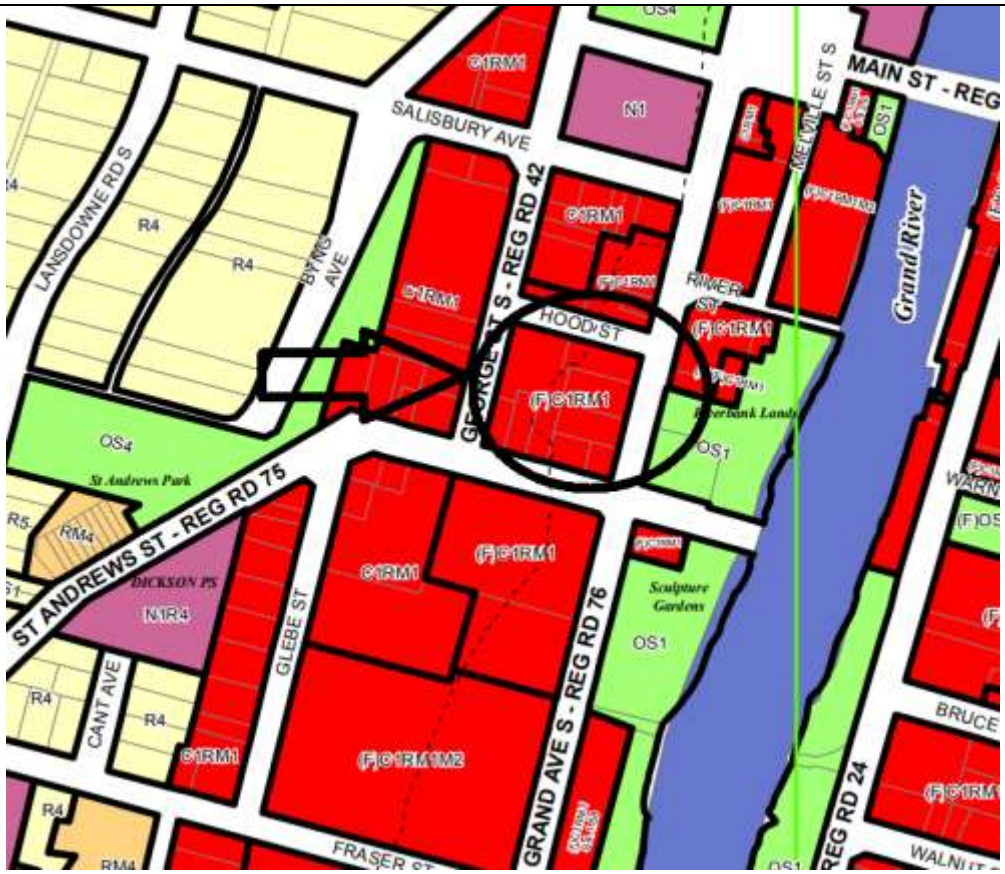
The Proposal will satisfy /conform to the City of Cambridge Special Policy Area policies of Section 3.B.6.1.1.22). As such, it is anticipated that all technical requirements of the GRCA can be satisfactorily addressed. The Regulatory Flood Elevation for this area of the Grand River is 266.8 metres. The development plans created in support of this project indicate that all development (entrance and habitable area) will occur at 277 metres or greater.

6.0 CITY OF CAMBRIDGE ZONING BY-LAW NO. 150-85

The City of Cambridge Zoning By-law is a legal document that regulates the use of land within the municipality. The by-law determines and provides regulation that speaks to:

1. What each parcel of land can be used for;
2. Where and what types of buildings or structures may be located on the land; and
3. The requirements of lot sizes, parking lots, building heights and setbacks.

The subject lands are zoned "(F)C1RM1" as per Schedule "K9" of By-Law No.150-85.



City of Cambridge Zoning By-Law Schedule "K9"

Figure 28: City of Cambridge Official Plan

The (F) denotes that the lands which are affected by this classification lie at an elevation lower than the Regulatory Flood Line and may be used only in accordance with Section 2.1.8.1 of the By-law.

As the zoning is “C1RM1” it is considered a compound zone.

Compound Zones - Where two or more of the zoning symbols referred to in section 1.1.2.1 are shown on the zoning maps attached to and forming part of this by-law as applying to the same lands, the lands thereby affected may be used for any purpose specified in section 3 of this bylaw as a use permitted in each such zone, or for any combination of such uses, subject to the regulations prescribed in section 2.1.3 of this by-law.

The “C1” zone is a commercial use class zone which permits the following uses:

a neighbourhood grocery store in which not more than 300 m2 of gross leasable commercial floor area is provided
a neighbourhood variety store in which not more than 300 m2 of gross leasable commercial floor area is provided
any retail commercial establishment in which not more than 300 m2 of gross leasable commercial floor area is provided
any other retail commercial establishment described in section 3.3.2.1
a hairdressing establishment
any business and professional office described in section 3.3.2.2 [subject to section 3.3.1.4]
a food services establishment including a cart (see section 3.3.1.8)
a laundry or dry cleaner’s establishment but not a dry cleaning plant
a hotel or motel
a funeral home

any other service commercial establishment described in section 3.3.2.2
a place of amusement as described in section 3.3.2.4 except an amusement arcade
an amusement arcade if located in an enclosed shopping mall which is not closer than 500 m to a public or separate elementary or secondary school
a recreation centre as described in section 3.3.2.5
any other commercial recreational establishment as described in section 3.3.2.3
A subregional shopping centre
A community shopping centre
A neighborhood shopping centre
A local shopping centre (subject to section 3.3.1.4)
An auto service mall
a wholesale showroom and order office but not a warehouse or distribution centre
an establishment for the fabrication and sale of cemetery monuments
a use permitted in an N1, N2, N3 or OS4 zone
A day nursery or day car centre
a use permitted in all zones in accordance with section 2.1.1
a use, building or structure accessory to a permitted use
a detached, or semi-detached one family dwelling; provided, however, the dwelling unit was constructed for such purpose prior to October 27, 1986.

The Proposal includes 454m² of commercial space fronting onto Grand Avenue South.

The “RM1” zone is a residential use class zone which permits:

a residential special care facility (subject to section 3.1.1.3(b))
Attached one-family dwellings (linear row houses)
Attached one-family dwellings (cluster row house)
A detached duplex dwelling
Semi-detached duplex dwellings
Attached duplex dwellings (Linear)
Attached duplex dwellings (cluster)
A detached triplex dwelling
maisonettes
A mixed terrace
An apartment house containing 4 or more dwelling units
A class 2 boarding, lodging or rooming house.
a use permitted in any zone in accordance with section 2.1.1
an accessory use, building or structure in accordance with section 2.1.11

The Proposal would qualify as an Apartment House which is defined in the By-law as:

Apartment house means a residential building containing four or more dwelling units to each of which access is obtained through a common entrance or entrances from the outside and through a corridor or hallway from the inside, but does not include a row house, maisonette, mixed terrace or semi-detached duplex;

Section 3.1.2 4. provides the regulations for Apartment Houses containing four or more dwelling units in RM-class zones as follows:

Section 3.1.2 4.Requirements for Apartment Houses	Requirement	Proposed
(a) minimum lot frontage (m)	30	41.6
(b) maximum density (dwelling units per net residential hectare)	250	1605
(c) minimum front yard (m)	4.5m	0.0
(d) minimum exterior side yard (m)	4.5m	3.6m
(e) minimum interior side yard (m)	3m for the first 2 storeys, plus 1.5m for each additional storey, to a total required interior side yard of 12.0m	11.9m
(f) minimum rear yard (m)	3m for the first 2 storeys, plus 1.5m for each additional storey, to a total required rear yard of 12m	11.1m
(g) minimum gross floor area (m² per dwelling unit) (i) per bachelor or studio unit (ii) per one bedroom unit (iii) per unit with two or more bedrooms	 __ 50 60	 >50 >60
(h) minimum amenity area (m² per dwelling unit) (i) per bachelor or one bedroom unit (ii) per unit with two or more bedrooms	 20 30	 <20 <30
(i) maximum building height (m)	See section 2.1.9 and Appendix 5 21m	88
(j) minimum landscaped open space, subject to section 3.1.1.4 (% of lot area)	30	19%

(k) planting strips and fencing	In accordance with section 2.4	

Parking

Residential	1 space per dwelling unit within an area where required non-residential parking may be reduced by 25% (see Section 2.2.1 1.D) 382 units = 382 spaces	Bill 185, "Cutting Red Tape to Build More Homes Act" and the new Provincial Planning Statement, 2024 aim to streamline the planning process with the overall goal of increasing housing supply in Ontario. No minimum parking requirements can be prescribed in MTSA's. As such "0" parking spaces can be required by the Municipality. The Owner proposes 150 parking spaces. The provision of bicycle parking can still be required. The Owner proposes 83 Class A bicycle spaces and 6 Class B bicycle spaces.
Visitor	Area where required non-residential parking may be reduced by 25% & residential visitor parking does not have to be provided (See Section 2.2.1.1(b) & (d) & Section 2.2.2.10) (See Map Z4) = No visitor parking required	
Commercial	2.5 spaces / 100m² = (454/100) x 0.75 = 9 spaces	
Loading	1 space for Residential 0 spaces for Commercial	1 space provided

The following site specific regulations are required to permit the Proposal:

- A Maximum Density of 1605 units per hectare whereas 250 units per hectare is permitted
- A Minimum Front Yard setback of 0.0m whereas 4.5m is required
- A Minimum Exterior Side Yard setback of 3.6m whereas 4.5m is required
- A Minimum Interior Side Yard setback of 11.9m whereas 12.0m is required
- A Minimum Rear Yard setback of 11.1m whereas 12.0m is required
- A Maximum Building Height of 88.0m whereas 21m is permitted.
- A Reduction in the required Amenity Area from 7100m² to 4874m²

6.1 DRAFT CITY OF CAMBRIDGE ZONING BY-LAW

The City of Cambridge is currently working on updating their Zoning By-law to conform to their Official Plan. The latest version of the Zoning By-law that is available to the public is from 2019.

The proposed zoning at that time was "(F3)CMU1". The (F3) reflects a 'Floodplain 3' overlay zone which would be applicable to the Subject Property. The regulations speak to floodproofing for any new building proposed to have window, door or other similar opening lower than the level of the Regulatory Flood Elevation. No new habitable room would be permitted lower than the Regulatory Flood Elevation. The "CMU1" zoning is noted as the 'Core Mixed Use One' zone. It is noted that the "CMU1" zone "applies to the majority of the lands within the three Core Areas and a wide range of uses is permitted. The zone standards for the CMU1 Zone also reflect the highly urbanized form in the Core Areas and are designed to encourage appropriate development and redevelopment in accordance with the Official Plan".

The new Zoning has not been finalized and has no current standing as it will need to be further amended to ensure compliance with all policy related legislation.

7.0 PARKING SUPPLY

As noted the Subject Property is contained within an area identified as an MTSA by the Region of Waterloo. The Region of Waterloo Official Plan (as of January 1, 2025) has transitioned to be implemented by the City of Cambridge.

Bill 185, *Cutting Red Tape to Build More Homes Act*, 2024 received Royal Assent on June 6, 2024. Bill 185 limits the ability of municipalities to require an owner to provide or maintain parking facilities (other than for bicycles) within protected major transit station areas and certain other prescribed lands. The market will now dictate the number of parking spaces required in these areas.

Through the Pre-Consultation process the Owner was proposing a parking reduction based on the City's requirements for parking established through Zoning By-law 150-85. Minimum parking requirements can no longer be required by the City of Cambridge. As such, the provision of a Parking Justification Study would be a redundant exercise as any residential / commercial / mixed-use project proposed within an identified MTSA is not required to provide parking. That being said, the Owner believes that a certain amount of parking is warranted and a total of 150 parking spaces are currently proposed as part of this development project.

This equates to a ratio of 0.46 spaces per unit.

8.0 SUPPORTING MATERIALS

In support of the proposal the landowner has commissioned additional studies to support the utilization of the lands for the residential land use. A summary of the reports is provided below.

8.1 Functional Servicing Report and Plans

A Functional Servicing and Stormwater Management Design Report and accompanying civil engineering drawings have been prepared by GEI Consultants. The materials support the development and confirm that water, sanitary and storm services can all be extended to the development and provide sufficient capacity.

8.2 Pedestrian Wind Study

A Pedestrian Level Wind Study was completed by the Boundary Layer Wind Tunnel Laboratory in support of the Proposal. The study indicates the proposed development can be expected to affect wind patterns locally in regions through the development site. This is consistent with the introduction of a relatively tall development to an otherwise homogeneous site. Conditions are expected to remain suitable for their intended uses, subject to suggested mitigation and to be confirmed at the detailed design stage.

The focus of the study is to develop strategies to make the wind conditions suitable for the intended usage. The recommendations of the wind study have been vetted through the project architect and it has been noted the requested modifications can be accommodated into the project design. As such, the project can advance in a manner that the pedestrian wind level can be addressed / managed so that the window conditions are suitable for the intended usage.

8.3 Archaeological Study

A Phase I and II Archaeological Study was completed by Lincoln Environmental Consulting. The study found that no archaeological resources were identified during the Stage 2 archaeological assessment of the study area and as such no further archaeological assessment of the scoped study area is recommended.

The study has been accepted by the Ministry of Citizenship and Multiculturalism and has been entered into the Ontario Public Register of Archaeological Reports.

8.4 Noise Study

A Noise Study was completed by GHD Limited. The Study concludes that the Proposal is feasible and will not be restricted by the surrounding noise impact exposures provided that noise mitigation measures recommended in the study are adhered to. Noise control requirements to mitigate future road noise include an acoustic parapet, ventilation requirements and noise warning clauses. Additionally, the cumulative stationary noise levels at the Subject Property from nearby industrial and commercial facilities exceed the applicable Class 1 stationary noise limits of the MECP, and require physical mitigation. This includes silencers for three rooftop air handling units at the Hamilton Family Theatre and low-noise replacement of an

exhaust fan at the nearby My-Thai restaurant as well as the inclusion of Warning Clause Type E.

The Owner is aware of these requirements and contact has been made with the abutting property Owner's regarding these measures. As the project progresses, these conversations will continue.

8.5 Hydrogeological Study

A Hydrogeological Study has been completed by CVD Engineering. The study concludes that construction dewatering will not be required in support of the project. The report also concludes that there was no groundwater contamination identified at the Subject Property. Any limited soil PAH's contamination identified will be removed during construction of the Proposal. There is no anticipated risk to the Region's Middleton Street wells from the Subject Property or the Proposal.

8.6 Traffic Impact Study

A Traffic Impact Study was completed by Paradigm Transportation Solutions Limited. The study concludes that:

- The intersections in the study area are currently operating at acceptable levels of service
- The net impact of the development on traffic movements is found to be minor. All intersections and traffic movements are forecast to continue to operate at acceptable levels of service and within capacity up to a 2032 horizon.
- The study recommends Transportation Demand Management measures be implemented. The development is TDM supportive.
- The proposed vehicular access point on Hood Street meets guideline requirements for access spacing.
- An Autoturn assessment was completed to review vehicular swept paths confirming the design vehicles expected on-site can enter, exit and traverse the site without conflict.

8.7 Heritage Impact Study

A Cultural Heritage Evaluation Report and Heritage Impact Assessment has been completed by MHBC Planning Limited with regard to the lands at 32, 36 and 38 Grand Avenue South. The study concludes that the properties are of heritage value as they retain physical/ design value. The *Ontario Heritage Act* states that in order for a property to be listed on the heritage register, it must meet at least one of the criteria and for a property to be designated it must meet at least two criteria. All of the properties meet one criteria because they are representative of a particular architectural style. None of them however exhibit a level of design, construction or craftsmanship above what is expected for buildings of their time and style. Therefore the study concludes that that none of the buildings meet the criteria for designation under Part IV of the *Ontario Heritage Act.*

MHBC Planning are of the opinion that since the subject properties do not meet the criteria for designation, the City would not have the justification for designating the properties should an application for demolition or a development application for the lands be received.

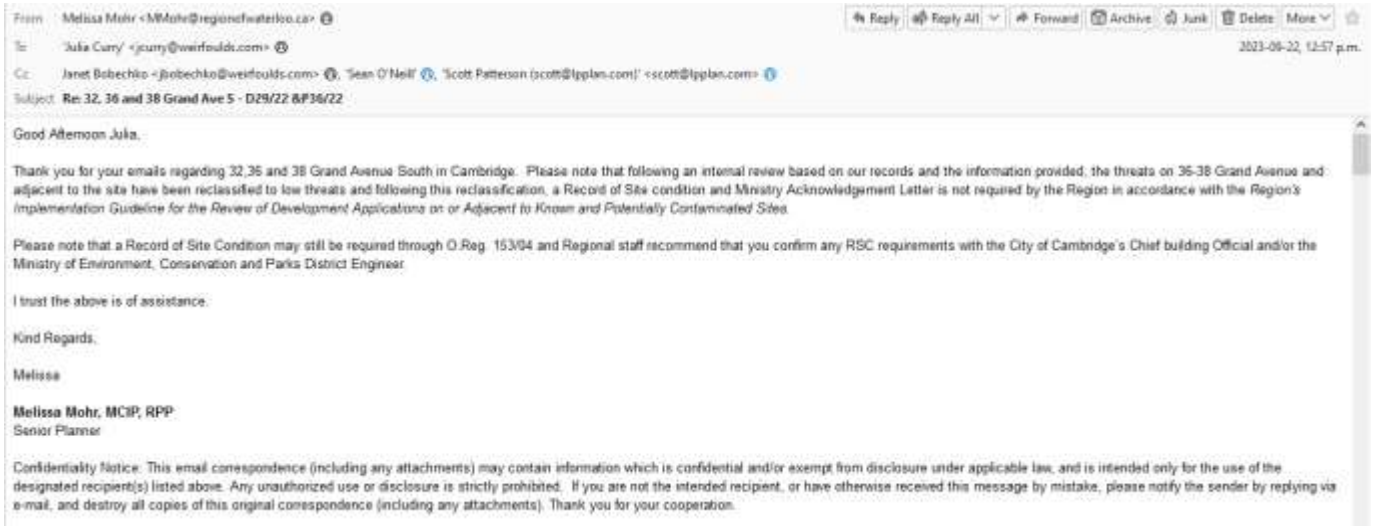
8.8 Urban Design Report

An Urban Design Report has been prepared by Patterson Planning Consultants Inc. to review the project and the Urban Design policies of the City of Cambridge Official Plan. The Urban Design Report also provides details on the shadow study, amenity area and other project details.

Upon review of the supplemental reports and materials I find further support for the proposed land use that is subject to these applications.

9.0 RECORD OF SITE CONDITION

Through the pre-consultation process it was noted that a Record of Site Condition would be required for this Proposal. This request was made by the Region of Waterloo. Through discussions with the Region it was confirmed on September 22, 2023 that the threats at 32, 36 & 38 Grand Avenue South and adjacent sites have been reclassified to low threats and following this reclassification, a Record of Site Condition and Ministry Acknowledgement letter is not required by the Region of Waterloo. Melissa Mohr was the Regional Planner who provide this confirmation as per below.



From: Melissa Mohr <MMohr@regionofwaterloo.ca>
To: 'Juka Curry' <jcurry@weirfoulds.com>
Cc: Janet Bobechko <jbobechko@weirfoulds.com>; 'Sean O'Neill'; 'Scott Patterson (scott@lpplan.com)' <scott@lpplan.com>
Subject: **Re: 32, 36 and 38 Grand Ave S - D29/22 &F36/22**

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2023-06-22, 12:57 p.m.

Good Afternoon Juka,

Thank you for your emails regarding 32,36 and 38 Grand Avenue South in Cambridge. Please note that following an internal review based on our records and the information provided, the threats on 36-38 Grand Avenue and adjacent to the site have been reclassified to low threats and following this reclassification, a Record of Site condition and Ministry Acknowledgement Letter is not required by the Region in accordance with the *Region's Implementation Guideline for the Review of Development Applications on or Adjacent to Known and Potentially Contaminated Sites.*

Please note that a Record of Site Condition may still be required through O.Reg. 153/04 and Regional staff recommend that you confirm any RSC requirements with the City of Cambridge's Chief building Official and/or the Ministry of Environment, Conservation and Parks District Engineer.

I trust the above is of assistance.

Kind Regards,

Melissa

Melissa Mohr, MCIP, RPP
Senior Planner

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10.0 PLANNING OPINION

It is recognized that the Official Plan is the most important vehicle to integrate and comprehensively implement Provincial policies and direct development. In this instance the City of Cambridge Official Plan has not been updated to accurately reflect the Provincial Planning Statement 2024, or the current amendments made the to the Region of Waterloo Official Plan.

The PPS 2024 places a clear priority on the optimization of lands, which goes beyond simple intensification. The key direction for the development of these lands is that the Region of Waterloo has identified the lands as now being within the Downtown Cambridge Station area (MTSA). As such the overall area is subject to Table 2 in the Regional Official Plan which outlines the Minimum Densities for Major Transit Station Areas. For the Cambridge Downtown Station the minimum density is 160. This minimum density is calculated in terms of people and jobs per gross hectare measured over the entire station area. The City of Cambridge would have participated in the Regional Official Plan amendment process and the imposition of the 160 people and jobs minimum for this area. Combined with the impetus of the PPS regarding the optimization of lands, and the overall historic nature of many parts of the Downtown Station area, it becomes even more imperative that lands available for development are utilized accordingly.

The Proposal seeks to optimize the use of these lands for needed residential housing. The Proposal represents the optimal use of the lands, infrastructure and future transit investment in

line with relevant Provincial policies. As the City moves forward with an update to their Official Plan and the implementing Zoning, sufficient weight will need to be given to Provincial policy allowing for increased heights and densities. Other municipality's within the Region have already completed this exercise and have proposed unlimited height to achieve the optimization of lands. The only restriction imposed on the other municipality was height restrictions related to the operations of the Waterloo Region International airport. Those restrictions would not be applicable to the Subject Property.

The Proposal for the Subject Property achieves the objective of optimization by aligning the new PPS's focus for intensification with sustainable growth in the context of the Galt core area. I opine that simply reviewing the Proposal against existing City of Cambridge Official Plan policy would be a flawed exercise and the COP policies are unreasonable and out-of-date for the appropriate redevelopment of the area.

The new development is consistent with the intensification and other policies of the PPS. The development of properties such as the Subject Property and the provision of housing units in a compact form as proposed will assist in ensuring that other areas of the MTSA that are limited due to Heritage related restrictions can remain in-situ. The Proposal will help bring new residents and jobs within walking distance of public transit, daily amenities, jobs, retail and commercial uses, parks and open space, schools, cultural facilities and public service facilities.

The proposed development is a high density development, in a compact form and is both pedestrian and transit oriented. To the south exists two high density residential towers which assist in establishing the need for higher density land uses in this area. I am of the opinion the planned development will have no undue adverse impacts or cause any environmental or health risks. It will be a mixed-use development similar to others in the area. There are no concerns with vibration, dust, odours, traffic or safety regarding this Proposal. The necessary studies have been completed to speak to noise, wind, shadow and hydrogeological concerns. Concerns that originally suggested a Record of Site Condition would be required have been alleviated. The Proposal will facilitate a high density mixed-use development that is an alternative to low density suburban development and encourages the efficient use of physical resources and municipal services.

The Owner could reduce the height of the building by removing the provision of all parking as proposed / permitted by Bill 185. Reduction in the podium height or a modification of the podium to residential land uses could result in a reduction in building height. In this instance, the Owner believes that a certain provision of parking is appropriate for the development and as such podium parking is proposed.

The Proposal is located close to public transit and lies within a community core area close to amenities and public services. This will assist in creating a complete and vibrant community and will assist in ensuring that minimum density targets are met. The Proposal supports the creation of a complete community, prioritizes intensification and higher densities in a strategic growth area (MTSA), makes efficient use of land and infrastructure, supports transit viability, supports a range and mix of housing options and helps conserve cultural heritage resources that exist in the Galt core area.

Although the Galt core area contains an Urban Growth Centre, not all sites within the Urban Growth Centre will develop or redevelop to the same extent. The amount of height and density on any site depends on the site location and context within the downtown. In order to meet minimum density requirements, certain sites will need to develop to a much greater extent than others. The Subject Property qualifies as a site that can be developed to an optimal state in order to achieve density and provide housing.

The Proposal has appropriate regard to the matters of Provincial interest set out in s. 2 of the *Planning Act.* The proposed built form, use and density, and location would provide for a sense of place in the area. The Proposal provides housing and jobs close to public transit and will use existing public infrastructure.

The Proposal conforms to the Region's Official Plan, which is now the City's Official Plan for implementation. The Subject Property is in a designated MTSA in which intensification and increased densities are encouraged and minimums mandated. The Proposal is in the public interest to provide housing and to ensure progressive action is taken to meet minimum density targets.

Policy 24.2 of the PPS 2024 requires that within MTSA's planning authorities to plan for a minimum density target of "*160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit"*. It is important to note that these are minimum density

targets for MTSA's, not maximums. Higher densities will need to be permitted through projects such as this Proposal in order to meet these density minimums.

Again, the PPS prioritizes land optimization which extends beyond basic intensification that requires more effort through site specific design to optimally realize the full potential of a property. The key planning objectives within an MTSA are transit-oriented sustainable community development and the provision of increased housing supply through appropriate built form.

I am of the opinion the Proposal demonstrates a range and mix of housing by including one and two bedroom units and looks to appropriately balance provincial and municipal policy objectives without impacting the historic aspects of the Galt core area. All policy documents are to be considered in their entirety, rather than focusing on one set of policies to the exclusion of others. The overall analysis supports the importance of adopting a comprehensive approach when assessing this Proposal, enhancing its compatibility and achieving optimal density. Current height limitations as found in the COP and expressed by staff through the Pre-consultation process do not give sufficient weight to Provincial policies and priorities, nor to the reality that the recognition of the lands within an MTSA requires density and height to achieve the established goals. The City will be amending their policies to reflect the PPS and MTSA requirements and using existing policy - which will be amended accordingly – to not support this Proposal would be unreasonable.

The current COP requires 45 percent of all new residential development occurring annually within the Region as a whole to be constructed within the Built-Up Area. Amendment No. 6 to the Regional Official Plan increased this requirement to 60%. In order to meet these requirements, compact development with increased height and density will be required. The Proposal will support walking, cycling and transit as alternative mode choice to the private automobile. The success of the downtown Cambridge Station will rest on developments such as this Proposal proceeding.

The proposed Official Plan amendment seeks to increase the maximum height and density provisions currently permitted. As noted previously, the maximum height and density is prescribed in Table 3 of the Regional Official Plan as follows:

	Maximum Density	Maximum Height (including above ground parking structures)
Galt City Centre outside the Urban Growth Centre	2.0 FSI	5 storeys
Regeneration Area	2.0 FSI	8 storeys
Proposed	13.4 FSI	28 storeys

I am of the opinion that a maximum height of 8 storeys for a site located within an MTSA does not reflect the most efficient use of land and existing / proposed infrastructure. I am of the opinion that the Proposal will make the most efficient use of the Subject Property, result in the optimization of lands and existing infrastructure.

The Subject Property is impacted by the Galt City Centre Floodplain Special Policy Area. It is expected that all habitable space will be developed / provided at a level above the regulatory flood limit. For any portion of the building that will have to be within the floodplain limit (such as elevator pits, foundation walls etc.) the features will be constructed to be water tight below grade to resist hydrostatic pressure. As noted through the Hydrogeological Study, construction dewatering is not required and long term dewatering will not be necessary.

Development within the Special Policy Area is permitted subject to meeting certain criteria. It is my opinion through discussions with members of the consulting team working on this project that the criteria can be met. Access to the building and all habitable space will be above the Regulatory Flood Elevation.

It is clear that the Province has placed an emphasis / focus on MTSA areas to develop in a compact /dense manner. The removal of parking requirements through Bill 185 is indicative of the need to maximize development and implement projects such as this Proposal.

The results of the various studies completed in support of the Proposal support the development of the Subject Property. The shadow study confirms the impacts are minimal and reasonable for this type of project.

An amendment to the Official Plan for maximum FSI and height are required however I am of the opinion that these are appropriate for lands within the Built-Up area and identified as a MTSA.

As noted, the Subject Property is zoned "(F)C1RM1" and the commercial uses proposed would be permitted by the applicable "C1" zoning. An apartment house is a permitted land use. The site specific regulations requested to facilitate the Proposal will realize intensification and optimization of the Subject Property above and beyond what the current zoning permits. The current zoning is historic and considerably out of date compared to the policy direction that has been enacted since. The existing COP is also out of date and both documents need to be amended accordingly to continue to foster development in the City of Cambridge. I am of the opinion the nature of the site specific regulations being requested are suitable given the context of the Subject Property within the MTSA. The requested building height and increased density will not negatively impact adjacent properties. Active, progressive steps need to be taken to ensure that the minimum density targets of people and jobs per hectare and an intensification target of 60% for the Built-Up area will be achieved.

I am of the opinion that the City of Cambridge needs to take active steps to support and approve applications such as this Proposal to achieve the optimization of lands within the Cambridge downtown MTSA.

11.0 PUBLIC CONSULTATION STRATEGY

The *Planning Act* (O.Reg 544/06, amended by O.Reg 178/16) requires that applicants submit a proposed strategy for consulting with the public with respect to an application.

The public consultation process in support of the Official Plan Amendment and Zoning By-law Amendment application for the Owner for the lands at 32-38 Grand Avenue South is proposed to follow the *Planning Act* statutory requirements. The following points of public consultation are proposed:

- A Public Meeting at which time public input will be considered. Notice of the meeting shall be given to every owner of land within 120 metres of the subject land, and by posting a notice in a place that is clearly visible from a public street (or as directed by the City of Cambridge)

- Direct written responses to comments raised through the public consultation process will be provided to City Staff for their review and consideration in the preparation of a Staff Report with a recommendation.

- Preparation of a Staff Report, with the Report to be available to the public in advance of City Council's consideration of the applications. It is understood that City Staff will post information on the City website for public review. This will include the City Staff Report and may also include technical studies and reports prepared in support of the application or resubmission materials if required.

- A City Council Meeting regarding the applications and a recommendation regarding the City Staff Report, all available information, and public input will be considered in Council's final decision.

The consultation strategy proposed will provide members of the public with opportunities to review understand and comment on the Official Plan and Zoning By-law amendment applications. The consultation strategy will be coordinated with City Staff and additional opportunities for consultation will be considered and may be warranted based on input received.

12.0 SUMMARY AND CONCLUSIONS

In conclusion, it is my professional opinion that the proposal for the Official Plan and Zoning By-law amendment as presented for the subject lands is appropriate for the following reasons:

1. The proposal has given due consideration to the items noted in Section 2 of the *Planning Act*.

2. The proposal is consistent with the Provincial Planning Statement 2024

3. The proposal conforms to the Region of Waterloo Official Plan (including ROPA No. 6) which is now to be implemented by the City of Cambridge.

4. The proposal will contribute to a range and mix of land uses available within the broader area.

5. The proposal will contribute to a complete community.

6. The subject lands are of adequate size to accommodate the proposed use and can be developed on full municipal servicing.

7. The proposed use of the subject lands is not anticipated to cause adverse impacts on abutting properties.

8. The proposed use of the property represents good planning.

9. The submissions satisfy the requirements outlined in the pre-consultation process

10. The outlined public consultation process is intended to ensure active public and agency engagement so that the public interest can be addressed throughout the process.

11. The Proposal will result in the optimization of the land use of the Subject Property.

It is therefore concluded that the proposal is consistent with the PPS 2024, conforms to and implements policies pertaining to MTSA's, the proposal has had appropriate regard for Section 2 of the *Planning Act*, and represents good planning.

On the basis of the foregoing, the proposed Official Plan and Zoning By-law Amendment applications should be deemed complete and it is my opinion that City of Cambridge Council should support the project as proposed.

Scott J. Patterson, BA, CPT, MCIP, RPP
Principal
Patterson Planning Consultants Inc.