Application OR03/20 OPA and ZBA Circulation Comments
61-69 Ainslie Street South, Cambridge

Detailed Response Matrix – Prepared by GSP Group / WZMH August 2023

Agency		Response/Action
City of Cambridge		
Development Planning		
The applicant is to be commended on the attention to detail and urban design for the proposed concept plans.	Noted. Appreciate the comments.	
Questions were raised by Council at the public meeting regarding potential heritage assets with the stone wall and the 'Dr. Junk' building. Heritage staff will be providing comments on the application under separate cover.	Cultural Heritage concerns have been addressed with acknowledgement of Archaeological Impact Assessment.	
Staff are generally supportive of a mixed-use development with higher density residential in a podium and point tower configuration.	The podium height has had to increase along with the individual towers to accommodate additional land taking by the Region of Waterloo. However, the proposed development remains in keeping with the original submissions.	
Future Site Plan application will be required with specific attention to the façade design and material choices to ensure a high caliber development at a gateway site.	A site plan application was submitted in April 2022 with 1st submission comments provided in August 2022. Site Plan response comments also submitted.	
Staff encourage the applicant to continue discussing affordable housing options with the Region and will continue to assist however possible to facilitate the inclusion of affordable units within the proposed development.	The developer is agreeable to providing 20 affordable housing units within the building or a suitable alternative such as an affordable housing contribution.	
Please provide some additional details for the rooftop amenity area on the podium in terms of general proposed amenities as well as whether the area is intended to be public or an exclusive use area for residents of the building.	Amenity areas are to be for the exclusive use of the occupants of the building. Additional details will be refined through the site plan approval process.	
Some additional attention to the overall massing of the podium may help the proposed development to establish and maintain a more pedestrian friendly streetscape either through changes in materials or additional variation of the façade through step backs or potential design changes with balcony sections. More detailed design comments will be discussed through the site plan process but consideration to the relationship between the podium and the surrounding buildings as well as the pedestrian realm will likely have a big impact as to how the proposed development is received.	Comment noted. The podium design has been modified to address this comment. Further details to be reviewed through Site Plan.	

Economic Development	
Economic Development Staff has no objection to the applicant's proposal, as it is in keeping with the strategy to have more people living and working within the community core areas.	Comment noted. The development will provide for 399 dwelling units in a range of sizes from studio to 3 bedroom units.
Economic Development is of the opinion that the applicant's proposal satisfies a majority of these policies, save for the maximum height limitations. Staff encourages the applicant to utilize the bonusing policies as the property is in the UGC. Given the wonderful gateway location and importance/prominence of this property, a high level of urban design/materials must be incorporated into any building proposal. The applicant and agent should be advised that the City has financial incentive programs for such projects.	Comment noted. A high level of design is proposed and will be refined through the site plan review process.
Parks	
The subject site is at the outer limit of the 500m walking distance service level to nearby Centennial Park and Mill Race Park (both "passive recreational parks") and not within walking distance service levels of any "active recreational" parks. The impact will be ~400-1000 new residents using the existing park and greenspace amenities in the Galt core. Larger parks with active recreational opportunities are approximately 1.2km – 2km walking distance from the site (e.g. Soper Park, Dickson Park, Churchill Park). Trails (e.g. Mill Creek Trail, Absalom's Walk, etc.) do serve the site within 500m walking distances. As these types of high density developments continue in the Galt core growth centre they will place pressure on existing parks and trails to meet the active recreational needs of new residents and signal the need for a new park in the core area. The land required to service the recreational needs of the incoming (~400-1000) residents of this development alone would be approximately 1.4 hectares, or roughly the size of one and a half senior soccer fields, or the equivalent of the adjacent	The proposed development will provide on-site amenity areas for the exclusive use of building occupants. On-site amenity spaces include Multi-purpose room, roof terrace on top of 5th storey podium and individual private balconies.

Cambridge Bus Terminal property and nearby City parking lot property combined. This would represent a service level of ~14-35 sq. m per person while the City-wide average is 42 sq.m per person (Development Charges Background Study, May 2019). It would also represent twice the land area of the (~0.7 hectare) subject site in order to service the incoming population with recreational opportunities within reasonable walking distances.	
The original presubmission concepts proposed rental buildings and the City does not have a parkland dedication by-law that would allow for the collection of parkland dedication cash-in-lieu on a rental tenure project. The only way the City can collect parkland dedication at this time is through a land division application (i.e. Consent, Plan of Subdivision, Plan of Condominium) under Section 51 of the *Planning Act*. If the project is proceeding as a Plan of Condominium, then parkland dedication cash-in-lieu as per Section 51 of the *Planning Act* will be a condition of approval. If a rental tenure is chosen, no parkland dedication will be paid unless the City has a parkland dedication by-law in force at the time of the relevant application.	Future tenure of the building to be determined.
Street Trees	
The applicant is seeking some reductions from the Zoning regulation (as per the highlighted table below). Opportunities for establishing “street trees” (whether in the City-owned right of way or as part of the private property landscaping) are limited in general, and the reductions in setback would further constrain opportunities.	Landscaping details and street tree opportunities are included with the Site Plan application.
In redevelopment situations, structural soils, silva cells, irrigation techniques, and adequate soil volumes for growing trees to maturity is required. The City (Engineering Development Standards Manual) requires street trees every 12m. Trees have a spread, even among columnar species, that can range from 3m-15m depending on species and stature.	Tree planting details to be further refined through the site plan approval process.

The Urban Design Report (July 2020) features renderings but no trees are depicted. The pedestrian experience around the site is important and trees are an essential element to anchoring the human scale. The Urban Design Report notes that detailed design will provide landscaping and pedestrian facilities on the street frontages. A Landscape Plan will be required (at Site Plan stage of the process) and it should include silva cells, maximum soil volumes, and appropriately drought, salt, and air quality resistant species whether the trees are established on private or public property and must clearly demonstrate coordination with all above ground and underground utilities and resolve any conflicts with the particular utility provider in the favour of street trees and maintaining both services. We request that the setbacks and frontages, as proposed to be reduced through the zoning by-law amendment be examined in this light and that the applicant provide an assurance that street trees will be possible on the three frontages given the proposed setbacks/zoning by-law amendment.	A landscaping plan will be prepared in support of site plan approval. The following setbacks are proposed: Front Yard (Bruce Street): 12.1m (following road widening/taking) Rear Yard (Bus Terminal): 2.3m Exterior Side Yd. (Wellington Street): 1.5m (following road widening) Exterior Side Yd. (Ainslie Street):1.0m
Requirements (on Site Plan, or Plan of Condominium) 1. A tree by-law permit will be required for the thirteen tree removals on site shown on the Engineering Submission Removals Plan. These should be processed through a Tree Permit application (see Forestry webpage). It is suggested that the applicant submit their Landscape Plan simultaneously in order to reduce or eliminate the Replacement Tree Fund payable.	This will be reviewed and determined through the site plan approval process.
2. Parkland dedication will be required as cash-in-lieu on Plan of Condominium and an appraisal will be required.	Noted
3. Landscape Plan / street tree plan (Site Plan)	Noted
Environmental	
Please provide the MECP acknowledgement letter to confirm the Record of Site Condition was not audited.	Ministry Acknowledgement provided – see attached.

Development Engineering	
Based on our review of the application, Staff has no objection to the Official Plan and Zoning Bylaw Amendment at this time.	Comment noted.
However, the applicant is to address the following comments to the satisfaction of Engineering Staff prior to Site Plan Approval:	Further details will be provided in support of site plan approval.
• A Sanitary Capacity Assessment, based on the revised unit count, has been completed by the City and has confirmed downstream capacity is available to support the proposed development.	Noted.
• The storm sewer outlet connection to the box culvert is to be clarified. The servicing drawing notes that the existing 300mm storm sewer is to be capped at the property line. Is the intent to tie in to the box culvert at MH.1?	Updated Engineering Plans submitted Aug. 2023.
• Staff notes that the inverts of 265.11 have been proposed at MH1 which is approximately the same as the top of the box culver based on as recorded drawings.	Noted.
• The notes on the servicing & grading plan are to be revised to remove the reference to City of Hamilton Standards. The pipe materials are to be as per the Region of Waterloo and Area Municipalities Design Guidelines and Supplemental Specifications (DGSSMS 2020).	Updated Engineering Plans submitted Aug. 2023.
• Once the Fire Flow demands are determined by the mechanical engineer existing boundary conditions can be provided by the Region of Waterloo (please contact John Holowackyj, Engineering & Planning Coordinator at (519) 575-4429 or JHolowackyj@regionofwaterloo.ca)	Noted.
• Alternatively, if a hydrant flow test is required please note that the Owner's flow test contractor will need to coordinate the operation of existing City hydrant valves with the City's Operations department (please contact Johanne Simpson at SimpsonJ@cambridge.ca).	Noted.
• 150mm watermain to be DR18 PVC.	Noted. Updated site servicing plans submitted.

• In addition to the property line valve, a valve is to be provided at the connection to the main for connections 100mm and larger (as per DGSSMS detail E2-07). • Existing redundant water services are to be identified on the servicing plan and a note is to be added indicating that redundant water services are to be cut and capped at the main by city forces (at 100% owners expense). • Redundant storm and sanitary services can be capped at the property line by the owner's contractor. • Confirm if the area south of the buildings will be a soft surface landscaped area (this appears to be the case based on the runoff coefficient used on the SWM modeling). • If the balance of the site coverage is limited to roof or landscaped surfaces then Staff is in agreement that no quality controls would be required. **Summary** The above comments will need to be addressed prior to Site Plan Approval. If you have any questions, or require further details, please do not hesitate to contact me.	Noted. Updated site servicing plans submitted. Noted. Updated site servicing plans submitted. Noted. Updated site servicing plans submitted. Noted. Updated site servicing plans submitted. Noted. Updated site servicing plans submitted. Comments noted and will be further reviewed through site plan approval process and updated servicing plans as submitted for Site Plan Approval.
Transportation Engineering	
The City's Official Plan designates the road allowance on Bruce Street between Water Street South and Main Street as 20m. The existing road allowance width along the frontage of your property varies between approximately 16.0m and 14.2m. Therefore, the City will require a conveyance of land varying approximately from 2.0m to 2.9m along the north side of Bruce St between Ainslie Street North and Wellington South. Contact Transportation Engineering for detailed dimensions and process requirements.	Reference Plan has been prepared and resubmitted herewith.
Conveyance of property within the daylight triangle to the City will be required. The daylight triangle area consists of the point where the extended curb lines of Bruce Street and Wellington South meet, to 15m west along Bruce Street, 15m north along Wellington south and those two points connected. The diagram	Reference Plan has been prepared and submitted herewith.

below is an example of how the daylight triangle is measured. It is not to scale and does not necessarily reflect the actual daylight triangle location.	
Additional detailed comments will be provided through the formal Site Plan application should one be received.	Noted. A site plan submission has been provided and follow up comments matrix and resubmission provided.
Region of Waterloo	
Corridor Planning	
Regional staff have received and are reviewing the report entitled "61-69 Ainslie Street South, Environmental Noise Assessment, Cambridge, ON, July 2020. Comments will be provided separately.	Noted.
The stationary noise aspect of the development is currently under review and comments will be provided separately.	Noted.
The Region shall require approval of the Environmental and Stationary Noise Study prior to a recommendation being made on the Official Plan and Zoning Bylaw Amendment.	Noise Study prepared by SLR has been submitted for review.
Although the Road dedications indicated in the Transit Planning section below can be deferred to a future site plan stage, Regional staff request that the road dedications be reflected on all concept plans for the Official Plan and Zoning Bylaw Amendment moving forward. The concept plan associated with the Official Plan and Zoning By-law Amendment shall need to be updated to reflect the future light rail transit route referenced in the Transit Planning section below and the future land dedication. The site shall be planned to accommodate this land dedication.	The plan has been updated and reviewed with Regional Transit Planning Staff and has been confirmed to be satisfactory to their needs. A reference plan for the widening has been submitted herewith.
Site Plan Application Stage	
Transit Planning	
Regional staff have worked together with the City and the applicant to determine where future land acquisitions will be required for the future ION route, but it appears that the latest site plan does not reflect this (Plan A-002, Site Plan, dated 8 July 2020, authored by WZMH Architects). Please see attached Preliminary Property Acquisition Plan Future for the latest estimation of land, which will be required to accommodate the ION Stage 2 project (attached as Appendix 'A'). Depending on the timing of a formal Site Plan Application, that application	Revised plan has been adjusted to accommodate Regional Transit needs. A sketch clarifying the overall land taking around this property has been prepared and submitted herewith.

may be subject to formal land dedications as conditions of approval.	
Region and City staff have received and approved a draft reference plan for the road widening along Ainslie Street South. This property has been identified as an area of potential contamination and the road widening lands require remediation and confirmation. Staff are working with the applicant to finalize the road widening.	Road widening details have been agreed to with Regional Transit Planning Staff. A sketch clarifying the land takings around this property has been prepared and submitted herewith.
Please be advised that the Regional Council approved Future ION route is adjacent to this property. In the future, when Wellington Street becomes a Regional Road, access to Wellington Street will be right-in/right-out only.	Comment noted.
The proposed loading area on Ainslie Street South will require approval of Regional Council. The proposed loading area shall have a 15-minute time limit and may be used by the public. Corridor planning staff will co-ordinate a report to council with TES staff at the site plan stage to implement this.	Loading area has been revised to be located on private property with access from Wellington Street.
A Regional Access Permit shall be required for the proposed access to Ainslie Street South and for Wellington Street after the roadway is transferred to the Region. The fee for the issuance of these permits is currently $230.00 each (total currently $460.00). The proposed accesses must comply with the Regional Access Policy. The application for an Access Permit can be found on the Region's website at http://forms.regionofwaterloo.ca/ePay/PDLS-Online-Payment-Forms/Commercialhttp://forms.regionofwaterloo.ca/ePay/PDLS-Online-Payment Forms/Commercial-Access-Permit-ApplicationAccess-Permit-Application	Comment noted. A Regional Access Permit will be sought at the appropriate time.
Stormwater Management & Site Grading Regional staff have received and are reviewing Grading Plan, Site Servicing Plan and the report entitled 61-69 Ainslie Street South, Servicing Report, all dated July 16, 2020 prepared by Karugu Consulting Incorporated. **Comments will be provided separately.**	Further review to be provided with Site Plan submission. Revised site servicing plans submitted.
Other A Site Plan pre-consultation fee (currently $300.00) and a Site Plan review fee (currently $805.00) shall be required for the review and approval of a future Site Plan Application.	Comment noted. Fees were provided with Site Plan Application in April 2022.

Approval of the road widening, Access Permits, Lot Grading Plan and Stormwater Management Report, Loading Zone is required prior to final approval of a future Site Plan Application.	
Cultural Heritage Cultural Heritage staff have reviewed the Archaeological Assessment submitted in support of OR03/20. Prior to final approval of the Zoning By-law Amendment, Regional staff shall require the submission of the Ministry of Heritage, Sport Tourism and Culture Industries acknowledgement letter of the Archaeological Assessment. It is recommended that the Ministry's Acknowledgement Letter be forwarded to the Region as soon as possible.	Ministry acknowledgement provided on Aug. 4, 2020.
Environmental Threats Inventory (TID)/Record of Site Condition As indicated in the pre-submission for the above proposal, there are medium and high threats on and directly adjacent to the subject lands. In addition, the proposal is to permit a more sensitive land use, therefore a Record of Site Condition (RSC) is required in accordance with the Region's Implementation Guideline for the review of Development Applications on or Adjacent to Known and Potentially Contaminated Sites (Section 2.G.18 of the ROP). Staff acknowledge a RSC was received in 2016 (File No. 222033) and Regional staff have no further comments regarding the Record of Site Condition.	Noted. No further action required. Ministry acknowledgement provided.
Risk Management The property at 61-69 Ainslie Street South is within the Part IV area under the Clean Water Act and a valid Notice of Source Protection Plan Compliance was received as part of the complete application for the Official Plan and Zoning By-law Amendment. Under the Grand River Source Protection Plan, 2020, a Provisional Risk Management Plan has been negotiated for 61-69 Ainslie St S. There are no further comments regarding Risk Management and the Section 59 Notice from an Official Plan and Zoning By-law Amendment stage. Please be advised that a complete risk management plan shall be required at the Site Plan Approval stage.	No further action required at this time. Risk Management Plan prepared in support of Site Plan Approval.
Hydrogeology and Source Water Protection	Comment noted. Site Plan maintains one level of underground parking (see P1 Floor Plan).

Hydrogeology staff acknowledge that there is one level of underground parking and have no concern with the underground parking as it is currently proposed. **Regional staff request that a provision be added to the Zoning By-law to limit the underground parking structure to one level or less. In addition, regional staff request a prohibition on geothermal energies to be written into the zoning by-law.** In addition, as indicated in the Region's pre-submission consultation record for this proposal, **Regional staff respectfully request a copy of the Source Protection Potential Contamination Study**. Regional staff shall not be in a position to sign off on the application until this study has been received and prepared to the satisfaction of the Region.	CVD is reviewing the needs of this report and will submit under separate cover.
Water Services Water Services Staff have reviewed the Servicing Report for 61-69 Ainslie Street South prepared by Karugu Consulting Inc. dated July 16, 2020 and provide the following comments: Section 2.2.1 of the Servicing Report recognizes the existing watermains in the area including the dual use 450 mm dia watermain and acknowledges all redundant services will be capped for the project and Section 2.2.2 of the Servicing Report proposes servicing from this development to the dual use watermain. Please be advised that the connection to the 450 mm dia watermain will be able to meet the required fireflow demands expected from this development. **Regional Water Services staff note that the Servicing Report did not acknowledge the changes to the Hydraulic Grade Line, which was provided through the pre-submission of the application.** The subject site is currently located in the Cambridge Zone 1 pressure zone, with an existing HGL of 332 mASL. Please be advised Cambridge Zone 1 will be undergoing adjustments to the HGL. As such, the applicant should account and design for the future expected hydraulic grade line of 323.5 mASL for the ultimate design of the site. The anticipated timeline for the HGL adjustment is by end of 2023. Based on the above, under existing conditions, the site will require individual PRV's in the future, however this	Noted. Updated site servicing plans submitted.

condition will not be required based on existing elevations in the area. Regional Water Services has no concerns in regards to the proposed Official Plan and Zoning Bylaw Amendment. Regional Water Services staff request to be circulated on future Site Plan applications for this site.	Additional details to be resolved during the site plan review stage.
In addition to the above, Ainslie Street has been identified in the Region's Transportation Capital Program (TCP) as project number 5692 as reconstruction and major rehabilitation. It is currently scheduled for design in 2019 and construction in 2022-2023. Please contact Andrew Doman at Doman@regionofwaterloo.ca or 519575-4400 x. 3183 for further information regarding service connections.	Noted. We have reviewed the project with Regional Transportation staff and have provided a plan indicating the road widenings that will be taken from this property.
General Comments Based on the above, the Region requires the following technical issues to be satisfactorily addressed to the satisfaction of the Region prior to a recommendation to City of Cambridge Council being made: 1. Approval of the Environmental and Stationary Noise Study; 2. Ministry Acknowledgement Letter for the Archaeological Assessment; 3. Source Protection Potential Contamination Study; and, 4. Update to the concept plan to incorporate the ION Road dedication into the plan. In addition, the Region requires the following be written into the Zoning By-law: 1. Prohibition of Geothermal Energy; and, 2. Provision that limits the underground parking structure to one level or less.	 Completed. Sign off provided. Completed. Ministry Acknowledgement provided Aug. 4, 2020. Source Protection – Notice of Risk Management Plan provided. Completed. Plan has been updated to address land needs. No concerns with prohibition on geo-thermal in zoning by-law. No concerns with maximum limit on underground parking to one level.
Grand River Conservation Authority	
The architectural elevation sketches do not provide the geodetic finished floor elevations of the ground level and the upper residential floor levels. This is required to verify that all proposed habitable units at or above the RFE. These elevations will also confirm whether the finished door/windows are at or above the RFE. If they are below the RFE, then specialized doors/windows would need to be installed to address the floodproofing requirements.	Geodesic elevations have been provided in the site plan and will be noted in the podium floor plans; and in the elevations. The ground floor is at 266.85 while the GRC regulation flood height is at 266.80. Hence, all floors for this project are above the potential flood height.

Parking garage elevations are not clear in either the architectural plans or the engineering plans. The parking garage entrance fronting Ainslie Street will need to demonstrate that it is at or above the RFE to ensure floodwaters are not allowed to enter the interior of the parking garage structure.	Geodesic elevations have been provided in the architectural plan for the Parking level. The entrance to the parking garage is noted at 266.85. The parking level (P1) is below the 266.80; but only habitable spaces must be at or above the level for potential flood height. The parking level it is not considered a habitable space.
The architectural plans indicate that a mechanical/electrical room is to be located on the first floor, however no geodetic elevations have been provided. Again, this information needs to be provided to address the floodprooding requirements by either demonstrating that the finished floor elevation of this room is at or above the RFE or providing details as to the floodproofing measures to be employed.	Geodesic elevations have been provided in the site plan and will be in the podium floor plans; and in the elevations. The ground floor is at 266.85 while the GRC regulation flood height is at 266.80. Hence, all floors for this project are above the potential flood height
For elevators, we will require confirmation that there will be an appropriate float switch system will be provided that will raise the elevator cars to a higher floor in the event of flooding. This can be provided at detailed design and as part of the future site plan application and GRCA permit application.	This detail to be confirmed at the time of detailed design.
While a structural engineer's letter has been submitted, it appears to be a preliminary letter and does not reference the applicable RFE with regards to the specific floodproofing measures and materials to be used to ensure the new structure will be floodproofed. This will need to be clarified as part of the future site plan and GRCA permit submissions.	To be addressed through site plan.
We have also reviewed the submitted servicing report and have no concerns. However, we would recommend that the City of Cambridge ensure that the stormwater quantity controls and the capacity of the Mill Creek culvert are adequate to receive additional stormwater. In addition to the construction of the new structure, please further note that a permit from the GRCA will be required for any new outlet to Mill Creek under Ontario Regulation 150/06.	Comment noted. To be reviewed at detailed design.
Based on the foregoing, the GRCA is not in a position to recommend approval of these applications at this time. The applicants require the submission of revised plans and information that clearly addresses the applicable SPA floodplain policies of the City of Cambridge and GRCA's technical requirements.	Revised drawings have been prepared as outlined above and have been submitted.

Please see site plan response matrix also submitted in a standalone letter.

Yours truly,

GSP Group Inc.

Brandon Flewwelling, MCIP, RPP

Development Planning Manager