

February 23, 2024

To: Laura Dewar  
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From: Neil Loewen RPP, MCIP  
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**Re: Peer review opinion of the Planning Justification Report and Revised Urban Design Report submitted as part of an Official Plan and Zoning By-law Amendment application OR 09/23 for the lands at 134 and 144 Fountain Street North, 199 Abraham Street and 102 Fountain Street South in Cambridge**

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Dear Ms. Dewar,

Urban Strategies has been retained by the City of Cambridge for the provision of planning consultancy services in the peer review of the Planning Justification Report and Revised Urban Design Report submitted as part of an Official Plan and Zoning By-law Amendment application (OR 09/23) for the lands at 134 and 144 Fountain Street north, 199 Abraham Street, and 102 Fountain Street South in the City of Cambridge. This memo provides our comments on the two reports and a summary of our professional opinion as to whether the proposed development is consistent and in conformity with the applicable planning policy framework and represents good planning.

### **Planning Justification Report**

The following section provides comments on the review of the Planning Justification Report prepared by GSP Group with Architecture Unfolded in October 2023. The report includes the following sections:

- Introduction
- Site Overview and Context
- Proposed Development
- Policy Overview and Analysis
- Proposed Applications
- Supporting Studies
- Public Consultation Considerations
- Conclusion

This table of contents is generally considered comprehensive and includes the required materials for the determination and articulation of a professional planning opinion.

## Site Overview and Context

The report describes the context of the development site, with the following key defining features:

- At the edge of the Preston Core Area
- At the base of, and including, a hill leading up to the Preston Heights neighbourhood
- At “one of the most iconic terminating vistas in the Region of Waterloo looking westerly from “main street””
- On the site of the now-demolished Preston Springs Hotel, a former heritage landmark
- In close proximity to the Phase 2 iON Light Rail Transit route

These defining features distinguish the site as a unique place for intensification that requires a site-specific and careful approach to rezoning and development.

The context review does not include a review of area development applications, which is an important factor in determining the appropriateness of development, and in understanding the evolving and planned built form context. A review of proposed and approved applications in north-west Cambridge and south-east Kitchener finds six relevant active proposals and two relevant recent approvals, listed below.

### Proposed Developments:

- 581 Langs Dr - 595 Langs Drive
  - One 7-storey mixed-use building with 136 units
- 255 King St W
  - One 15-storey tower with 179 units
  - One 17-storey tower with 194 units
- 410 Queen St W
  - Ten towers ranging between 12-30-storeys
  - Residential, commercial, and office
- 201 & 207 Hespeler Rd
  - One 12-storey residential tower
  - One 17-storey residential tower
- 777 Laurel St
  - Six residential towers
  - Tower heights ranging between 12-14 storeys
- 506-510, 516 Hespeler Rd + 1000 Langs Ave
  - Five 20-storey mixed-use buildings
  - Total of 1,366 units

## Approved Developments:

- 4396 King St E, Kitchener
  - One 30-storey residential tower
- 4220 King St E, Kitchener
  - 18-storey residential tower

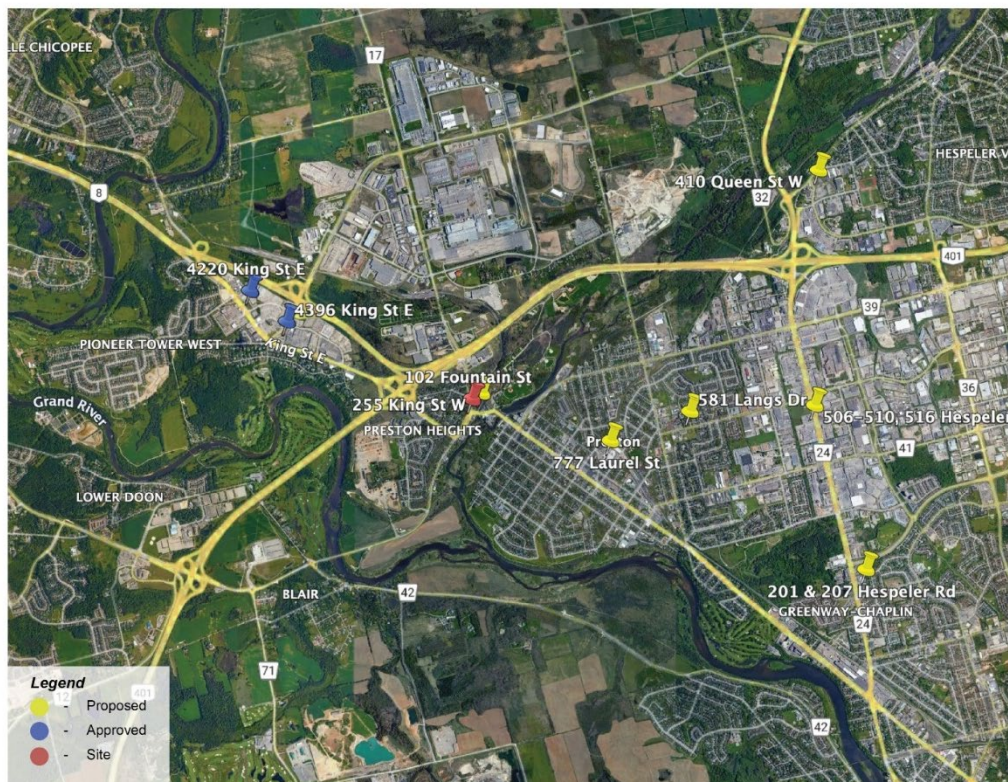


Figure 1: Proposed and recently-approved development applications for tall and mid-rise buildings in the area of the proposed development.

This review of the development context finds that there are several sites where significant residential intensification is proposed in Cambridge and south-east Kitchener. Most proposals are located in areas of large-scale retail, commercial, and mixed-use centres, significantly distant from the proposed development. There is one proposal nearby, at 255 King Street West, which has similar adjacencies to lower-scale neighbourhoods as the proposed development, and proposes heights of 15 and 17 storeys.

While the Planning Justification Report also does not note the heights of buildings in the area, the Urban Design Report does note the context of mostly low-rise buildings with an existing 13-storey building at 237 King Street West, and 12- and 16-storey buildings at 100 Eagle Street North.

The proposed development's significantly greater heights (three towers of 22, 24, and 26 storeys) are much larger in scale and require justification as to why this increase in scale is appropriate for this site.

### Proposed Development

The development proposal for the site is described in Section 3 of the report, with architectural drawings and renderings to accompany the explanatory text. The proposal is described as a high-density mixed-use residential project with three towers atop a five-storey podium parking structure. Greater detail is included in the Revised Urban Design Report included in the application and reviewed in the latter part of this memo.

### Policy Overview and Analysis

The review of planning policy includes, the Ontario Planning Act, Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe, Regional Official Plan, City of Cambridge Official Plan, and City of Cambridge Zoning By-law.

The Cambridge Official Plan includes policies to support the residential compatibility of new development (8.4.2.1), noting the factors – listed a through l – to be taken into consideration in assessing the compatibility of new development in these areas. The Planning Justification Report provides a response to each factor in the bulleted list but in our opinion does not adequately justify compatibility according to factors a) and i) as listed below:

- a) “the density, scale, height, massing, visual impact, building materials, orientation and architectural character of neighbouring buildings and the proposed development”
- i) “transitions between different land uses and between sites having varying permitted uses.”

The report refers to horizontal and vertical separation from the low-density residential uses, the orientation of the towers toward Fountain Street, the buffering of tree cover, and the lack of sun/shadow impact and explains that greater detail is provided in the Urban Design Report. It is our opinion that the significant difference in height (26 storeys adjacent to 2 storeys), density, and visual impact require greater justification than is provided in the Planning Justification Report and Urban Design Report. As the 26-storey tower is located 6.7m from a low-rise residential neighbourhood site, it is not clear how transition has been achieved appropriately between these two very different scales of development. The elevation drawing on Page 26 of the Urban Design Report shows the relationship between the low-rise residential properties in Preston Heights and the proposed development, demonstrating the stark difference in scale and close proximity between the differing land uses.

Official Plan policy 8.4.3 provides location criteria for multi-unit residential development, including:

- 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.

Similarly to the response to policies above, the report justifies the design and scale of the proposed development through horizontal and vertical separation, building orientation, tree retention, and sun/shadow impacts. It is not clear that the factors to determine compatibility have been adequately addressed by the justification, including:

- Horizontal and vertical separation: a common metric for setting back taller buildings from lower-scale buildings is the use of an angular plane, typically set at 45-degrees. The proposed development is significantly taller than such an angular plane would permit – though it is acknowledged that there is no policy requirement for this exact assessment of horizontal separation between areas of different scales.
- Building orientation: locating the buildings closest to Fountain Street increases the separation distance from the low-rise residential neighbourhood in Preston Heights. However, the design of three slab towers oriented north south brings the tall buildings closer to these neighbourhoods than if point towers with a smaller east-west dimension were used.

### Proposed Applications

Section 5 describes the Official Plan Amendment and Zoning By-law Amendment requested for the site to permit the proposed development. It is noted that there is currently no height limit on the site, but it is important to pair that with the existing zoning as Institutional and Low-density Residential. The proposal to rezone for different land uses than currently permitted requires a related assessment of the appropriate height for the new use.

### Conclusion

The report summarizes the findings of the policy review and articulates the opinion that the proposal is consistent with the PPS and conforms with the Growth Plan, Regional Official Plan, and Cambridge Official Plan, and represents good planning.

It is our opinion that the site is indeed an appropriate location for transit-oriented intensification. It is an important historic property with prominence at the terminating vista of King Street with a historical and contemporary importance for the image of Cambridge and Preston. The proposal has included important references to this heritage, including the inclusion of Preston Public Gardens, and the architectural detail of the building.

Overall, it is not clear that the significant height requested for three towers on this site has been adequately justified. The heights are far beyond any existing or proposed in the immediate context, and do not adequately provide separation from adjacent low-rise neighbourhoods, in particular the 6.7m separation distance to the south. Greater urban design detail is assessed in the following section.

## Revised Urban Design Report

The following section provides comments on the review of the Revised Urban Design report prepared by GSP Group with Architecture Unfolded in October 2023.

In general, the Urban Design report should provide further details of the components of the plan, especially the publicly accessible open spaces and their interaction with the context of the site and the system of existing open spaces. That could include more detailed and clear circulation, connectivity diagrams, annotated ground floor uses plans, as well as a further detailed shadow and views impact study.

### 1. Height and Density

- There is justification for residential intensification on the site, but we believe the applicant should demonstrate further and more clearly the rationale for the proposed height and density within the current and planned context as:
  - The proposal is significantly taller than the current neighbouring development application, and any existing buildings nearby. (see figure 1)
  - The proposal site is located within a 6-7min walking radius of the potential future ION Preston Station
  - The proposal site is directly abutting a low-rise neighbourhood designation on three of its four sides, composed of 1 to 2 storeys houses.
  - Although the three towers are oriented so that the short side faces the neighbourhood property along Abraham St., further demonstration should be provided to rationalize that the current shape, location and separation distance provides adequate transition with those neighbourhood property and potential further development. Specifically: exploration of point towers may reduce proximity to the neighbourhoods to the west; towers that step down toward the low-rise residential neighbourhoods may provide better transition between scales; reducing the 35m tower separation may provide a greater separation between the 26-storey tower and the low-rise property to the south.

### 2. Vehicular Access

- Further justification and exploration should be provided regarding the vehicular access to the sites as:
  - Four curb cuts are providing vehicular access to the proposal: 3 along Fountain St. and one on Abraham St. Generally, curbs cut should be minimized to provide a safer and more-continuous public realm.
  - It is not clear as to why the private two-way access from Abraham Street exists – is it envisioned as daily access for residents/visitors? It should be adequate for all access to be provided from Fountain Street. Removal of this driveway to Abraham Street

could provide an opportunity for more outdoor landscaped space and help in regards to the community concerns.

- More detail should be provided regarding internal circulation within the structured parking, especially regarding drop off/deliveries access and visitor access/parking. The current parking drawing set (page 20 of the Urban Design report) seems to indicate that visitors, drop-offs, and delivery trucks would need to drive and turn around internally within the structured parking garage. Either a lay-by PUDO area on Fountain Street or a drop-off loop on site should be explored.

### **3. Public Realm**

- With a development of this scale, at this location in Cambridge, it is important for development to support an improved public realm. The Urban Design Report makes mention of multiple POPS/"publicly-accessible private areas", Preston Square, the Preston Garden and an enhanced public realm under arcades along Fountain St. The applicant should demonstrate further and more clearly how the new public realm elements contribute to the public experience of users and public accessibility within the area;
  - The Urban Design Report mentions the creation of 12,922sqm of amenity space which seems to include the POPS areas. We recommend providing a clear diagram showing private amenity space vs publicly-accessible spaces.
  - Demonstrate how Preston Square will be activated by viably sized retail units or other uses, that are appropriate for this site location in Cambridge.
  - Demonstrate more clearly how the Preston Gardens will be an enjoyable publicly accessible open space. Currently the landscape plan on page 39 of the Urban Design Report only shows access from Fountain St by one staircase on the far north side of the development along a blank wall. The Urban Design Report also mentions a potential access via an elevator accessible from Preston Square inside the development that can be assumed as private. The third access to Preston Gardens is shown through a path along the proposed private driveway to the Abraham St residential cul-de-sac.
  - The landscape plan also shows that existing trees will be preserved and some indication of pedestrian circulation but does not clearly define what is part of private amenities and what is publicly accessible. It also does not provide clear information on how grade changes and interactions with the structured parking wall, entrance/exits and exhaust vent are mitigated to create an enjoyable publicly accessible open space that is rooted in the original historic garden idea.
  - Further exploration could be undertaken to move Tower A further north and provide a clear direct publicly-accessible and landscaped connection from Abraham St down to Fountain St, to which a relocated Preston Square could attach to.

- More detailed should also be provided regarding shadowing on the gardens – it is not clear that the proposed public gardens will have the level of sunlight required. Providing a complete full shadow study could be useful.
- The idea of the arcade is a nice historical touch, in relation to the previous building on the site, but the applicant should demonstrate that the arcade along Fountain St. will create an enhanced public realm space for pedestrians, how it will be activated by active uses, will provide decent sunlight, wind impact mitigation and not create dead end spaces. The ground floor plan on page 20 of the Urban Design report seems to show the arcade terminating into a private entrance, covered by the grade change of Fountain St and mostly used as bike parking storage.

#### **4. Setbacks**

- Given the location of the proposed development we are noting that the tower separation and setbacks are very aggressive and could reduce the potential development of the neighbouring sites along Fountain St, as well as create negative wind, shadow, sky view, and overlook impacts for the adjacent site.

In summary, while the development site is an appropriate location for intensification and new housing, our comments above suggest areas where additional justification for the proposed built form and landscape design is required before a determination of appropriateness can be confirmed.

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