Planning Justification Report

8 Schofield Street

Ram Chandrer Holdings Inc.

City of Cambridge

Official Plan Amendment
Zoning By-law Amendment

April 2025

GSP group

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Prepared for:
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1. Introduction

1.1 Overview

GSP Group ("GSP") has prepared this Planning Justification Report ("PJR" or "Report") in support of an Official Plan Amendment and Zoning By-law Amendment Application (the "Subject Application") being made by Ram Chandrer Holdings Inc. ("Ram Chandrer") for the property municipally addressed as 8 Schofield Street, Cambridge (the "Site"). The Site is shown on Figure 1.

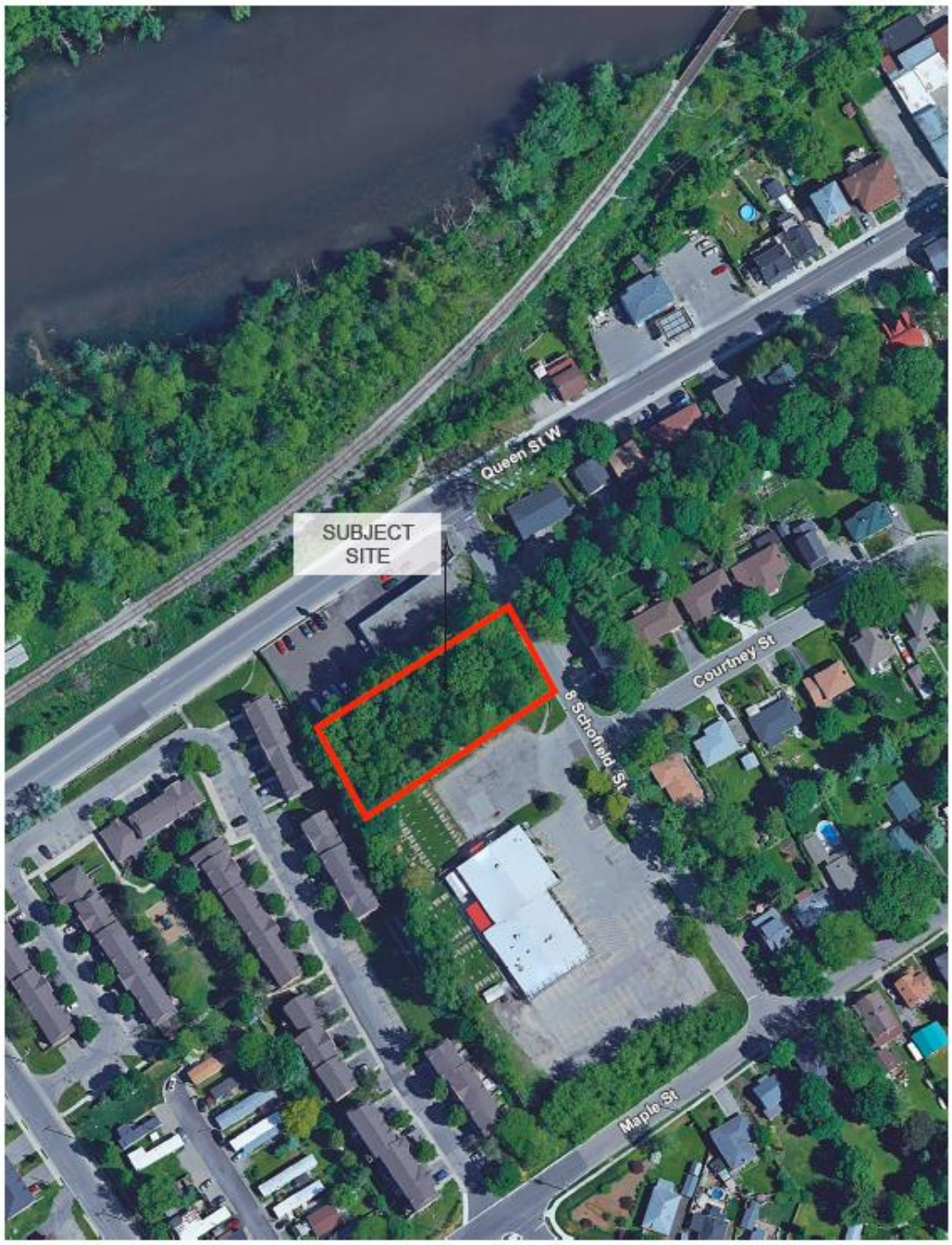
The purpose of the Subject Application is to facilitate the development of a 5-storey, 86-unit apartment building with associated parking (the "Proposed Development"). To facilitate construction and future approval of the Proposed Development, the Subject Application requests:

- Official Plan Amendment to increase the permitted residential density; and,
- Rezoning the Site as Residential RM3 ("RM3") Zone with a Site-Specific Exception.

A pre-consultation meeting for Official Plan Amendment and Zoning By-law Amendment was held on August 2, 2023 (File No. D21/23). The City identified a PJR as a requirement of a complete application. The City requires an Official Plan Amendment and Zoning By-law Amendment prior to a future Site Plan application.

The following technical reports have been considered in our analysis:

- Functional Servicing Report
- Hydrogeological Study
- Stormwater Management Report
- Salt Management Plan
- Urban Design Brief
- Parking Study



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Site Location
Source: Google Earth (2022)

Figure 1

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1.2 Purpose and Scope

This Report has been prepared in support of the Subject Application and will provide planning justification for the proposed Official Plan Amendment to increase the permitted residential density and Zoning By-law Amendment to facilitate a zone change to add a Site-Specific Exceptions to the existing N1RM3 (Institutional/Residential) zone. The Low/Medium Density Residential designation will remain with a new Site-Specific Policy.

The objectives of this Report are as follows:

- To provide an overview of the Site, including site descriptions and surrounding uses;
- To provide a brief summary of the Subject Application;
- To provide a summary of existing planning policies and regulations that apply to the Site; and,
- To provide a planning justification for the Subject Application.

2. Site Overview and Context

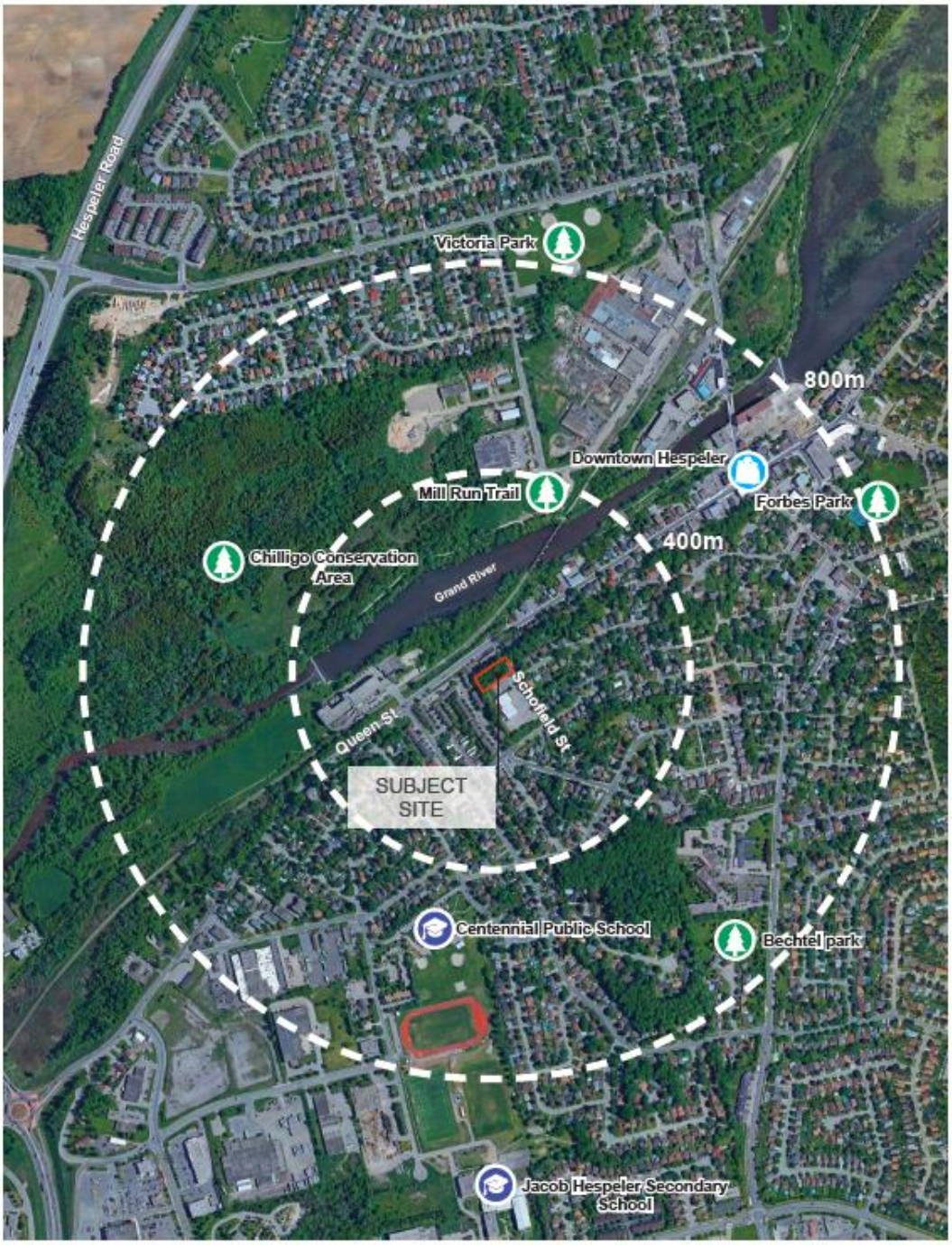
2.1 Site Location and Description

The Site is known municipally as 8 Schofield Street, in the City of Cambridge. The Site is legally known as PLAN 832 PT LOT 76 RP 58R20305 PT 1. The Site is approximately 2,185.0 square metres in area, with approximately 30.4 metres of frontage along Schofield Street. The Site is currently vacant. There is a slope on the Site from south to north going toward Queen Street West. The Site is currently designated Low/Medium Density Residential in the City of Cambridge Official Plan and is zoned N1RM3 (Institutional/Residential) in the City of Cambridge Zoning By-law.

2.2 Surrounding Uses and Context

The Site is located within the City of Cambridge City Limits in the Hespeler neighbourhood. To the north of the Site is an auto repair shop fronting Queen Street West, with a rail line and the Grand River adjacent to its north. To the east of the Site is Scofield Street and residential townhouse uses. To the south of the Site is a Royal Canadian Legion branch. To the west of the Site is a townhouse complex.

Adjacent to the North of the Grand River is the Chilligo Conservation Area and Mill Run Trail. Further east down Queen Street is Downtown Hespeler and Forbes Park. South of the Site is Centennial Public School and Jacob Hespeler Secondary School, as well as Bechtel Park (see Figure 2).



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Surrounding Context
Source: Google Earth (2022)

Figure 2

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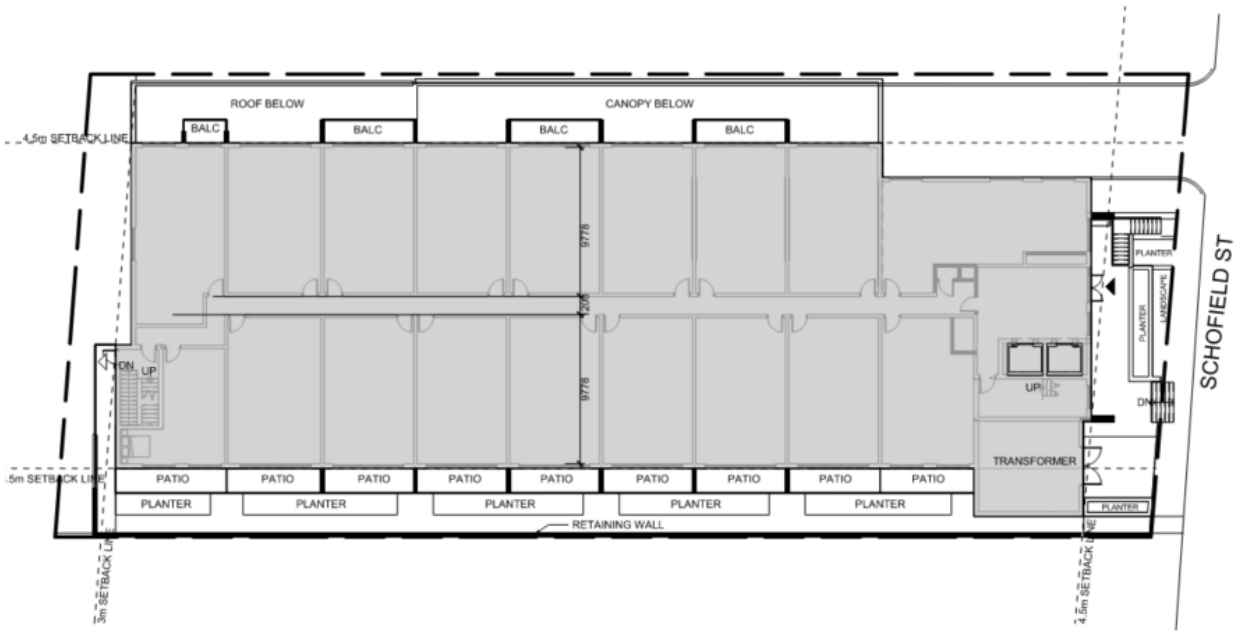
3. Proposed Development

Ram Chandrer is proposing the construction of an 86-unit, 5-storey apartment building that is 16 metres in height with a building area of 1,345.0 square metres covering 61.5 percent of the Site (the “Proposed Development”) (see Figure 3). In total, 97 parking spaces are provided, with the inclusion of 4 barrier-free spaces. A bicycle locker is provided. The Proposed Development features a mixture of studio, 1- and 2-bedroom unit options. Balconies are provided for some of the dwelling units. Planters and amenity space, including a party room and fitness room, are provided within on-site or within the interior of the Proposed Development.



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Site Plan

Source: MASRI O Inc. Architects

Figure 3

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4. Planning Policy Overview

4.1 Ontario Planning Act

The *Planning Act R.S.O. 1990, c. P.13* ("Planning Act") establishes the framework for land use planning in Ontario. The Planning Act provides for the integration of provincial matters in planning decisions; details a planning process that is fair, accessible, timely and efficient; encourages cooperation and coordination amongst various interest groups; and recognizes the decision-making authority and accountability of municipal councils in the planning process.

Section 1.1 of the Planning Act outlines the purpose of the Act, which are:

a) to promote sustainable economic development in healthy and natural environment with the policy and by the means provided under this Act;
b) to provide for a land use planning system led by provincial policy;
c) to integrate matters of provincial interest in provincial and municipal planning decisions;
d) to provide planning process that are fair by making them open, accessible, timely and efficient;
e) to encourage cooperation and coordination among various interests; and,
f) to recognize the decision-making authority and accountability of municipal councils in planning.

Section 2 of the Planning Act identifies matters of provincial interest which a municipality must "have regard to" in carrying out its responsibility under the Planning Act. These matters are general in nature and broad in range and are captured in more detail through the policy statements and provincial plans issued under Section 3 of the Planning Act through the official plans of the Region of Waterloo and the City of Cambridge.

Section 3(5) of the Planning Act requires that the decisions of municipal councils regarding the exercise of authority concerning planning matters include decisions of Planning Act applications:

a) shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision; and;
b) shall confirm with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be.

The 2020 and 2024 (if in effect at time of application) Provincial Policy Statement issued under Section 3(5) of the Planning Act is applicable and relevant to the consideration of

the proposed applications. The 2020 Growth Plan for the Greater Golden Horseshoe, the 2017 Greenbelt Plan, the 2017 Oak Ridges Moraine Conservation Plan, and the 2017 Niagara Escarpment Plan were also issued under Section 3(5). Out of these, only the Growth Plan applies to the Site in the City of Cambridge.

Response: The above criteria of the Planning Act have been considered in the preparation of this application. The Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe are discussed in detail in the subsequent sections of this Report.

Overall, the Proposed Development conforms to the policies outlined in the Planning Act.

4.2 Provincial Policy Statement (2020)

The Provincial Policy Statement ("PPS") provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use planning that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS is issued under Section 3 of the Planning Act and came into effect on May 1, 2020, replacing the PPS issued on April 30, 2014.

The following provides a summary of the key PPS policy considerations for the site as well as justification for the proposed development in terms of these policies. Justification for the Provincial Planning Statement (2024) is in Section 4.3 of this Report.

4.2.1 Building Strong Healthy Communities

Section 1.0 of the PPS outlines the policies for building strong healthy communities. The PPS states, "Ontario's long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth."

Policy 1.1.1 states, *"Healthy, liveable and safe communities are sustained by:*

a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;

b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries

and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;

c) *avoiding development and land use patterns which may cause environmental or public health and safety concerns;*

e) *promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;"*

Response: The Proposed Development makes efficient use of the vacant Site by capitalizing on its highest and best use, providing 86 units in a well-suited neighbourhood which is serviced by many community amenities, adding value to the Site as well as to the community amenities. Additionally, the Proposed Development will add to the range and mix of uses present in the neighbourhood, introducing a typology that is currently unseen in the neighbourhood while still being respectful of its current morphology and overall context. Next, the Proposed Development capitalizes on already-available land within the urban area, which lessens the strain on other land, including greenfield property and lands with environmental hazards. Finally, with the Site's close proximity to transit stops along Queen Street West, the intensification and infill of the Site will generate significant transit usage and thus reduce automobile use.

The Subject Application is consistent with the PPS policies for Building Strong Healthy Communities.

4.2.2 Settlement Areas

As noted, the Site is within the City of Cambridge's City Limits as an urban area, which is classified as a Settlement Area.

Policy 1.1.3 outlines Settlement Areas, which are, *"urban areas and rural settlements, and include cities, towns, villages, and hamlets."* Policy 1.1.3.1 states that *"settlement areas shall be the focus of growth and development."* Policy 1.1.3.2 states that, *"land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

a) efficiently use land and resources;"

Response: The Proposed Development is located within the City of Cambridge urban area and is classified as a Settlement Area, which is the focus for growth and development within the PPS. A residential apartment building will create significant residential development on an infill lot, providing more dwelling units (86) within an already

established neighbourhood. Overall, the Proposed Development effectively infills available vacant land that is within the urban area of the City of Cambridge.

The Subject Application is consistent with PPS policies for Settlement Areas.

4.2.3 Housing

Policy 1.4.1 states, *"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 residential intensification and redevelopment and, if necessary, 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 to facilitate residential intensification and redevelopment, and land in draft approved and registered plans."

Response: The Proposed Development will intensify the Site through residential infill on lands designated and available for residential development. As the Site is within the urban area in an already established neighbourhood, it has sufficient servicing capacity for the Proposed Development.

Policy 1.4.3 states that, *"planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:*

b) Permitting and facilitating:

1. All housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and

2. All types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;

c) directing the development of housing toward locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;

d) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;"*

Response: The Site is located in a well-established area of Cambridge where site servicing and infrastructure is readily available. Public service amenities, including a branch of the Royal Canadian Legion, a mosque, two public schools (elementary and secondary), a church, and two parks are within 800m of the Site. Similarly, the Proposed Development provides significant density to the Site, efficiently using the vacant land to provide 86 dwelling units. The Site is in close proximity to transit stops along Queen Street West, which allows for a high level of accessibility to the broader City of Cambridge as well as the Grand River Transit's network. The Proposed Development will introduce 86 units into Cambridge's housing stock, which will intensify the underutilized Site, filling in a void within the neighbourhood. As the Site is designated a Regeneration Area, intensification of the Site for residential use is supported.

The Subject Application is consistent with PPS policies for Housing.

4.2.4 Servicing

Section 1.6.6 outlines the policies relating to sewage, water, and stormwater.

Policy 1.6.6.1 states, *"Planning for sewage and water services shall:*

a) *accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:*
    1. *municipal sewage services and municipal water services; and*

Response: The Site is within the Built-Up Area and is within an established neighbourhood where municipal sewer and water services are already readily available.

Policy 1.6.6.2 states, *"Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services."*

Response: The Proposed Development is promoted by the PPS as it takes advantage of a vacant Site, which will optimize the use of already-available municipal sewage and water services.

The Subject Application is consistent with PPS policies for Servicing.

4.2.5 Stormwater Management

Policy 1.6.6.7 outlines the policies regarding stormwater management, and states, *"Planning for stormwater management shall:*

a) *be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
b) *minimize, or, where possible, prevent increases in contaminant loads;*
c) *minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*
d) *mitigate risks to human health, safety, property and the environment;*
e) *maximize the extent and function of vegetative and pervious surfaces; and*
f) *promote stormwater management best practices, including stormwater attenuation and reuse, water conservation and efficiency, and low-impact development.*

Response: The Subject Application is consistent with PPS policies for stormwater management. A Stormwater Management Report is discussed in Section 6.2 of this Report, which provides a detailed summary of the stormwater management considerations for the Site.

4.3 Provincial Planning Statement (2024)

The Provincial Planning Statement (2024) ("New PPS") provides policy direction on matters of provincial interest and guides growth and development in Ontario. The PPS supports land use planning that contributes to effective and efficient growth and development, long-term economic prosperity, and the well-being of residents.

The PPS is issued under Section 3 of the Planning Act, the 2024 PPS was approved in Council No. 1099/2024 and will come into effect on October 20, 2024 replacing the PPS issued on May 1, 2020. The New PPS replaces the existing Provincial Policy Statement (2020) and Places to Grow – Growth Plan for the Greater Golden Horseshoe.

The following provides a summary of the key New PPS policy considerations for the site as well as justification for the proposed development in terms of these policies. Justification for the Provincial Policy Statement (2020) is in Section 4.2 of this Report.

4.3.1 Planning for People and Homes

Policy 2.1.4 of the New PPS states, *"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."*

Response: The Proposed Development will intensify the Site through residential infill on lands designated and available for residential development. As the Site is within the urban area in an already established neighbourhood, it has sufficient servicing capacity for the Proposed Development.

The Subject Application is consistent with the New PPS policies for Planning for People and Homes.

4.3.2 Settlement Areas

Policy 2.3.1.1 of the New PPS states that *"settlement areas shall be the focus of growth and development."* Policy 2.3.1.2 of the PPS states that, *"land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

a) *efficiently use land and resources,"*

Response: he Proposed Development is located within the City of Cambridge urban area and is classified as a Settlement Area, which is the focus for growth and development within the PPS. A residential apartment building will create significant residential development on an infill lot, providing more dwelling units (86) within an already established neighbourhood. Overall, the Proposed Development effectively infills available vacant land that is within the urban area of the City of Cambridge.

The Subject Application is consistent with the New PPS policies for Settlement Areas.

4.3.3 Housing

Policy 2.2.1 of the New PPS states, *"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:*

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."*

Response: The Site is located in a well-established area of Cambridge where site servicing and infrastructure is readily available. Public service amenities, including a branch of the Royal Canadian Legion, a mosque, two public schools (elementary and secondary), a church, and two parks are within 800m of the Site. Similarly, the Proposed Development provides significant density to the Site, efficiently using the vacant land to provide 86 dwelling units. The Site is in close proximity to transit stops along Queen Street West, which allows for a high level of accessibility to the broader City of Cambridge as well as the Grand River Transit's network. The Proposed Development will introduce 86 units into Cambridge's housing stock, which will intensify the underutilized Site, filling in a void within the neighbourhood. As the Site is designated a Regeneration Area, intensification of the Site for residential use is supported.

The Subject Application is consistent with the New PPS policies for Housing.

4.3.4 Sewage, Water and Stormwater

Policy 3.6.1 of the New PPS states that, *"planning for sewage and water services shall:*

a) *accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services…"*

Response: The Site is within the Built-Up Area and is within an established neighbourhood where municipal sewer and water services are already readily available.

Policy 3.6.2 of the New PPS states that, *"Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems."*

Response: The Proposed Development is promoted by the PPS as it takes advantage of a vacant Site, which will optimize the use of already-available municipal sewage and water services.

Policy 3.6.8 of the New PPS states that, *"Planning for stormwater management shall:*

a) *be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
b) *minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
c) *minimize erosion and changes in water balance including through the use of green infrastructure;*
d) *mitigate risks to human health, safety, property and the environment;*
e) *maximize the extent and function of vegetative and pervious surfaces;*
f) *promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development…"*

Response: The Subject Application is consistent with PPS policies for stormwater management. A Stormwater Management Report is discussed in Section 6.2 of this Report, which provides a detailed summary of the stormwater management considerations for the Site.

The Subject Application is consistent with the New PPS policies for Sewage, Water and Stormwater.

4.4 A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Golden Horseshoe ("Growth Plan") provides policy direction on land use planning matters, including promoting mixed-use, compact urban form, redevelopment and intensification, and the efficient use of community infrastructure.

The Growth Plan derives its authority from the *Places to Grow Act, 2005, S.O. 2005, c. 13,* and guides municipal decisions regarding growth and development. The Growth Plan builds upon the policy foundation provided by the PPS and provides additional and more specific land use planning policies to address issues facing specific geographic areas in Ontario. The following provides a summary of the key Growth Plan policies that apply to the Proposed Development and how the Proposed Development meets those policies.

4.4.1 Delineated Built-up Areas

Policy 2.2.2.1 states that, *"by the time the next municipal comprehensive review is approved and in effect, and for each year thereafter, the applicable minimum intensification target is as follows:*

a) a minimum of 50 percent of all residential development occurring annually within each of the Cities of Barrie, Brantford, Guelph, Hamilton, Orillia, and Peterborough and the Regions of Durham, Halton, Niagara, Peel, Waterloo and York will be within the delineated built-up area;"

Response: The Site is in the Built-Up Area and is located centrally within the City. The Proposed Development provides 86 units to a Site that is well-surrounded by amenities and is currently vacant, which will contribute to the Growth Plan's minimum intensification target.

The Subject Application is consistent with Growth Plan policies for Delineated Built-Up Areas.

4.4.2 Housing

Policy 2.2.6.1 states that, *"upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will:*

a) support housing choice through the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan by:

i) identifying a diverse range and mix of housing options and densities, including additional residential units and affordable housing to meet projected needs of current and future residents;"

Response: The Proposed Development is a unique typology to the neighbourhood, utilizing the topography to minimize any visual height impact. The Proposed Development maximizes the highest and best use of the Site, adding 86 units on a vacant property into Cambridge's stock.

Policy 2.2.6.3 states that, *"to support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes"*

Response: The proposed development features a range and mix of unit sizes and typologies, including studio, 1- and 2-bedroom units of varied sizes and amenities, including balconies, patio space, and planters. These units will attract families of varied sizes and incomes.

The Subject Application is consistent with the Growth Plan policies for Housing.

4.5 Regional Official Plan

The Regional Official Plan ("ROP") was adopted by the Region of Waterloo in June 2009 and received final approval from the Ontario Municipal Board ("OMB") on June 18, 2016. The ROP provides policy direction on planning matters for the Region and includes all policy changes and amendments since the adoption of the Regional Official Policies Plan ("ROPP") in 1995. On August 18, 2022, Regional Official Plan Amendment No. 6 was adopted, and accommodates Waterloo Region's forecasted population growth to 2051, in conformity with the Growth Plan. This recent amendment is reflected and considered in this Report.

The following provides a summary of the key ROP policies that apply to the Site and the Proposed Development and justification in response to those policies.

4.5.1 Urban Area Policies

The Site is located within the Built-Up Area of the City of Cambridge, which is classified as an "urban area."

Policy 2.C.2 states that, *"this designation contains the primary urban areas of the Cities of Cambridge, Kitchener and Waterloo, and extends into portions of the Township of Woolwich. The lands included within this designation are intended to accommodate the largest share, almost 90 percent, of the Region's population and employment growth within the planning horizon of this Plan and will be planned and developed in accordance with the policies of this Chapter and other applicable policies in this Plan."*

Response: The Proposed Development will add 86 residential dwelling units to the City of Cambridge as an apartment building infill development and will contribute to the Region's goal of accommodating 90 percent of the population and employment growth.

Policy 2.C.2.2 states that *"area municipalities will develop official plan policies and implementing zoning by-laws, and other planning documents or programs to ensure that development occurring within the Urban Area is planned and developed in a manner that:*

e) provides a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes, in accordance with all the applicable policies of this Plan;

i) ensures the development of high-quality urban form through the site design and urban design standards that create an attractive and vibrant public realm;

Response: As noted previously, the Proposed Development will provide 86 residential dwelling units to the City of Cambridge. A range and mix of unit typologies are provided, accommodating the needs of all household sizes and incomes. Additionally, the Site utilizes the topography to limit any visual height impact to the lower-rise residential dwellings located to the southeast of the Site and creates a high-quality urban form that is attractive and vibrant.

The Subject Application is consistent with Regional Official Plan policies for Urban Areas.

4.5.2 Range and Mix of Housing

Policy 3.A outlines the policies and priorities for a range and mix of housing and states that *"Housing is a necessity of life and is an essential element for achieving an equitable, thriving, and sustainable community. Communities thrive when everyone has a place they can afford and call home, and where they can feel safe, comfortable, and part of the community. The policies in this section are all about meeting this important goal. They seek to provide for a diverse range and mix of housing options that are safe, affordable, of adequate size and meet the accessibility requirements of all residents."*

Policy 3.A.2 states, *"area municipalities, in collaboration with the Region, will plan to provide a diverse range and mix of housing options with an overall target of a minimum of 30 percent of new ownership and rental housing being affordable to low and moderate income households. The range and mix of housing options provided will vary in terms in terms of form, tenure, density, and number of bedrooms to accommodate the needs of all sizes, incomes, and ages of households."*

Response: The Proposed Development will create 86 residential dwelling units for City of Cambridge's housing stock on an underutilized Site. With a range and mix of unit typologies varying in size, including studio, 1-, and 2-bedroom, the Proposed Development will accommodate the needs of families of all sizes, incomes, and ages.

The Subject Application is consistent with the Regional Official Plan policies for Range and Mix of Housing.

4.6 City of Cambridge Official Plan

The Region of Waterloo approved the new Cambridge Official Plan ("Official Plan"), in part, with modifications, on November 21, 2012.

The City of Cambridge Official Plan ("Official Plan") was adopted by City Council on May 7, 2012, and was approved by the Region of Waterloo on November 21, 2021. The Official Plan was subject to 6 appeals, which have now been subsequently scoped and decided upon. The Official Plan implements Provincial and Regional plans, policies, statements, and guidelines and contains goals, objectives, and policies to manage and direct growth and development to the year 2031.

In the Official Plan, the Site is designated Low/Medium Density Residential (see Figure 4) and located in a Regeneration Area (see Figure 5). The following policies provide a summary of the key Official Plan policy consideration for the Site as well as the justification for the Proposed Development in terms of these policies.

4.6.1 Intensification in the Built-Up Area

The Site is located within the City of Cambridge Built-Up Area. Section 2.6 of the Official Plan provides policies for lands designated as Built-Up Area.

Policy 2.6.1.1 states that, *"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."*

Policy 2.6.1.2 states that, *"intensification is encouraged throughout the built-up area of Cambridge, particularly in the following areas:*

d) Regeneration Areas"

Policy 2.6.1.6 states that, "*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;*
f) *generally achieve higher densities than surrounding areas;"*

Policy 2.6.1.8 states that, *"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."*

Response: As noted previously, the Proposed Development will assist the City and Region in achieving their required intensification targets for new residential development within the existing built-up area, providing 86 total dwelling units on a currently vacant lot. As the Site is designated Regeneration Area, intensification is encouraged by the City. The introduction of 86 units on a vacant parcel, located in close proximity to community amenities and transit facilities, will complete the existing neighbourhood and broader community, drawing residents to the Hespeler neighbourhood.

The Proposed Development is compatible with the existing neighbourhood, using the topography of the Site to limit any visual height impact. Similarly, the Proposed Development respectfully provides a typology that is currently not seen in the broader neighbourhood, contributing to a diversity of uses and typologies within the broader neighbourhood. Similarly, as mentioned previously, the proposed unit typologies provide a range and mix of housing options, including studio, 1- and 2-bedroom options, which could accommodate a range of ages, sizes, and incomes. Finally, the Proposed Development provides a significant density increase to the neighbourhood, while still being respectful of differences in massing and visual height impacts.

Overall, the Proposed Development conforms to the City's Official Plan policies in Section 2.6.1 for intensification within the built-up area.

4.6.2 Regeneration Areas

The Site is located within a Regeneration Area, whose policies are outlined in Section 2.7.3 of the Official Plan. These policies state that "*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*".

Response: The Site is currently vacant; developing the Site will introduce a residential use to the western side of Schofield Street, which currently contains non-residential uses (auto repair, and legion facility). The Proposed Development will help achieve the overall objectives of Regeneration Areas by transitioning the lands (and surrounding properties) to a more residential use.

4.6.3 Range and Mix of Housing Types

Section 2.8.2 of the Official Plan states policies for the range and mix of housing types, including that "*the City will plan for a range and mix of housing that is affordable, accessible and safe*".

Policy 2.8.2.3 states, *"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."*

Policy 2.8.2.6 states, *"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;"

Response: the Proposed Development will intensify a vacant parcel through infill intensification and will contribute to the City's target of creating 45% of new housing units through infill and intensification. Residential intensification and the development of multi-unit residential development is encouraged in Regeneration Areas. The Proposed Development will create 86 units through the construction of a multi-unit apartment building which will represent a considerable increase to the City's ownership housing stock. Overall, the Subject Application conforms to Official Plan policies for Range and Mix of Housing Types.

4.6.3 Residential Densities

Table 3 of Policy 2.8.3.3 of the Official Plan states that lands within Regeneration Areas shall have a minimum Floor Space Index (FSI) of 0.5 and a minimum building height of 2 storeys, and a maximum FSI of 2.0 and a maximum building height of 8 storeys.

Response: The Proposed Development is 5 storeys in height, which is well within the height maximums contemplated by Policy 2.8.3.3. The FSI is approximately 2.95, which requires relief (as detailed in Section 5 of this Report) due to the constrained nature of the Site with respect to lot area and grading. The scale of the Proposed Development is within the general parameters of Policy 2.8.3.3, with relief required to the FSI which is justified by the Site constraints; the development otherwise satisfies minimum FSI, minimum heights, and maximum heights of the policy.

4.6.4 Residential Compatibility

Policy 8.4.2.1 of the Official Plan contains specific policy considerations for assessing compatibility of new development in intensification areas, including Regeneration Areas.

Response: The criteria of Policy 8.4.2.1 as well as commentary as to how each consideration has been satisfied is summarized as follows:

The City encourages development in the Urban Growth Centre, Community Core Areas, Nodes, Regeneration Areas and 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, masing, visual impact, building materials, orientation and architectural character of neighbouring buildings and the proposed development*	The Proposed Development is a 5-storey building that is compatible with neighbouring buildings. The scale of the building is minimized by incorporating the grading of the Site into the building design and including articulation of the north and south elevations to maximize separation from adjacent properties, which ensures the development is compatible with the surrounding neighbourhood. The Urban Design Report that has been prepared in support of the OPA/ZBA applications evaluates the Proposed Development based on urban design principles and confirms compatibility in meeting those best practices.
b)	*The conservation, protection, maintenance and potential enhancement of the natural environment and cultural heritage resources*	There are no natural or cultural heritage resources on the Site. Tree management and landscape plans will be addressed at site plan approval.
c)	*The continued viability of neighbouring land uses*	The Proposed Development will enable the continued viability of neighbouring land uses. The development is thoughtfully designed to respect the existing grading of the site, contains underground parking which minimizes impacts to adjacent properties, and the building is articulated to maximize separation to abutting lands. This is further explained in the Urban Design Report. It is also noted that the Site and neighbouring lands are located within a Regeneration Area in the City's Official Plan, so it is anticipated that uses on abutting lands will transition over time. The Proposed Development will not impact the ability of adjacent lands to do so, for the same reasons noted above.

d)	*Pedestrian and vehicular movement and linkages, as well as parking requirements and design in both existing development and proposed development*	Pedestrian and vehicular movements have been considered in the Proposed Development. Vehicle access is provided directly from Schofield Street to the underground parking garage entrance, and pedestrian access to the Site is provided separately from the vehicle driveway and leads directly to the main building entrance and lobby space. Overall, vehicular and pedestrian movements and linkages have been contemplated and thoughtfully incorporated into the Proposed Development.
e)	*Landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of existing development and proposed developments*	Landscaping and setbacks will largely comply with the City's Zoning By-law standards, with some relief justified in Section 5 of this Report. This contributes to the Proposed Development having adequate buffering from existing development. Due to the Proposed Development being less than 6 storeys, a Shadow and Wind Study was not required. The Urban Design Brief provides additional commentary on many of these items.
f)	*Noise attenuation*	As part of a previous planning application on the Site, a noise study was completed which secured implementation measures on title (Registered as WR1148187 on October 30, 2018) including replacing a condenser or installing an acoustic barrier, constructing the building with central air conditioning in compliance with NPC-300, enhanced exterior wall construction with noise mitigation for upper storeys, and noise warning clauses for all dwelling units, among other recommendations. These measures help address noise attenuation.
g)	*Odour, dust, and emission impacts*	Not applicable
h)	*Transportation implications*	It was confirmed by both the Region of Waterloo and the City of Cambridge that a Traffic Impact Study was not required for the Proposed Development at the formal Pre-Application Consultation. A Parking Study has been completed to support the proposed parking rates and is summarized in Section 6.5 of this report.
i)	*Transitions between different land uses and between sites having varying permitted uses*	The Site is adjacent to existing low rise non-residential and residential uses. The Proposed Development has been situated on the Site to provide for adequate vertical and horizontal separation from surrounding uses, and transition to potential future uses on surrounding lands which are located within the Regeneration Area.

		As per the Urban Design Report, sun-shadow impacts are minor and fall within acceptable standards.

4.6.5 Locational Criteria for Multi-Unit Residential Development

Policy 8.4.3 of the Official Plan contains location criteria for multi-unit residential that is to be considered when reviewing development applications. These considerations include access, proximity to transit, recreational and commercial uses, suitability in terms of size and configuration, compatibility, and the preservation of natural and cultural features.

Response: The criteria of Policy 8.4.3 as well as commentary as to how each of the considerations have been met can be summarized as follows:

The City will encourage the use of lands in residential designations… 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 amendment to this Plan, provide 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 a 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 roads;*	The Proposed Development is directly accessible to Queen Street West, a collector road, from Schofield Street. Schofield Street is a relatively short street (~190 metres) with non-residential uses on the west side (auto repair shop and Royal Canadian Legion branch), and low-rise residential uses on the east side. The nature of Schofield Street makes it not likely to disturb neighbouring residential properties, as the street (as it exists today) already serves a variety of residential and non-residential uses, which will continue with the Proposed Development.
b)	*Is conveniently located within a reasonable distance of public transit, recreational open space and shopping facilities, and if the building is proposed to be design for occupancy by households with children, is also located within convenient walking distance to an elementary school;*	The Site is located approximately 250 metres from a public transit stop on Queen Street (Route 51). the Site is within reasonable distance to various community parks, retail on Queen Street West, community amenities like the Royal Canadian Legion, a mosque, and a church, as well as Centennial Public School and Jacob Hespeler Secondary School.

		Specifics on the demographics of future residents is not known currently (i.e. households with children); it is noted that the Site is within 700 metres (10-minute walk) of an elementary school Centennial Public 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 for adequate on-site landscaping to; establish suitable outdoor amenities and recreational facilities for the building's occupants; screen parking areas; and provide effective buffer and screening to ensure privacy of outdoor recreational areas on the site as well as adjoining properties*	The Proposed Development has been designed to include: i) On-site vehicular traffic and pedestrian traffic are separated. Vehicles access the Site via a driveway from Schofield Street which leads to the underground parking garage, and pedestrians can access the building front entrance and lobby directly from the (future) sidewalk on Schofield Street. ii) Proposed access driveway to be designed in accordance with safety and building code standards, including emergency access services. iii) The Proposed Development will provide landscaping and amenity spaces in accordance with the City's Zoning By-law.
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 that the proposed development is compatible with existing development on adjoining lands; and*	The proposed development is compatible with existing development on adjoining lands. The existing development on adjacent lands consist of 1-storey non-residential uses, and residential townhouses to the rear. The Proposed Development is designed to be compatible with these uses by designing the building to accommodate grading on the Site (respecting existing conditions), articulating the massing on the north and south elevations to maximize separation from abutting lands, providing underground parking to minimize visibility and impact, and by largely complying with zoning setbacks and landscaping requirements. It is also noted that the

		area is located within a Regeneration Area and the Official Plan expects transitions from one use to another on these lands. Should these sites redevelop in the future, the Proposed Development would accommodate this, for the same reasons noted above.
e)	*Will include wherever possible the preservation and protection of the natural environmental and cultural heritage resources.*	There are no natural or cultural heritage resources on the Site. Tree management and landscape plans will be addressed at site plan approval.

4.6.6 Low/Medium Density Residential Designation

Section 8.4.6 of the Official Plan sets out policies for the City's Residential Designations. As noted, the Site is designated Low/Medium Density Residential. Policy 8.4.6.3 states that "*a maximum of 40 units per gross hectare for the Low/Medium Density Residential designation*" shall apply. Policy 8.4.6.16 further states that "*any property designated Low/Medium Density Residential, which is located within a Regeneration Area is permitted in the interim to develop for residential or mixed use purposes to a maximum density of 75 units per hectare… subject to the compatibility criteria in Section 8.4.2*".

Response: The Proposed Development exceeds the maximum density of 75 units per hectare permitted by the land use designation and associated policies, and as such, an Official Plan Amendment is requested. While the Proposed Development is respectful of the neighbourhood context and fits in well with the neighbourhood, due to the constrained lot area of the Site, the Proposed Development proposed a density of ~359.59. Section 5 of this Report, and commentary on compatibility criteria outlined in Section 8.4.2 and criteria for multi-residential development outlined in Section 8.4.3 provide justification for the amendment.

4.6.7 Urban Design

Section 5 of the OP provides policy direction and the foundation for a provision of a high standard of urban design. An Urban Design Brief has been prepared in support of the applications and can be found under separate cover.

4.6.8 Official Plan Conclusions

The Site is designated "Low/Medium Density Residential" in the City of Cambridge Official Plan and is located within a "Regeneration Area". This designation and associated policies

permit a maximum density of 75 residential units per hectare. An Official Plan Amendment is requested to increase the maximum density from 75 units per hectare.

Overall, the Proposed Development conforms with the City of Cambridge Official Plan and is consistent with the type of intensification. Redevelopment, and land use transition contemplated within Regeneration Areas, adhering to the policy objectives for development within intensification areas and location criteria for multi-unit residential development projects.

4.7 Land Use Compatibility

The Province's D-Series Guidelines provide direction on managing land use compatibility between facilities (i.e. industrial) and sensitive uses (i.e. residential) to protect incompatible land uses from each other. The guideline applies when a change in land use places or is likely to place a sensitive land use within the influence area or potential influence area of a facility. The purpose is to limit adverse effects from facilities on sensitive uses such as noise and vibration, odours and other air emissions, litter, dust, and other particulars, and other contaminants.

Adequate separation distance, based on a facility's influence area, is the preferred method of mitigating adverse effects. The separation distance should be sufficient to permit the functioning of the two incompatible land uses without an adverse effect occurring. The guideline is applicable when a new sensitive land use is proposed within the influence area or potential influence area of an existing facility, including the review of site-specific development plans such as redevelopment and/or infill proposals (2.2.3).

In the Record of Pre-Consultation Application, the Region of Waterloo notes that the Site is located within an area of influence of Class II Industrial land uses (being 300 metres) and required discussion on land use compatibility in the planning justification report, referring to the D-6 guidelines. The D-6 guidelines for compatibility between industrial facilities are intended to guide land use planning authorities on how to decide what types of land uses are appropriate near industrial areas. The D-6 guideline intends to prevent or minimize future land use problems due to the encroachment of sensitive land uses and industrial land uses on one another and applies to the Proposed Development as it seeks Official Plan and Zoning By-law Amendments (to which the guidelines apply).

The D-6 guidelines state that no incompatible development should occur in the areas identified below:

- Class I – 20 metres minimum separation distance;
- Class II – 70 metres minimum separation distance; and,

- Class III – 300 metres minimum separation distance.

The three classes of facilities are summarized below.

Class I Industrial Facility	Class II Industrial Facility	Class III Industrial Facility
A place of business for a small-scale, self-contained plant or building which produces/stores a product which is contained in a package and has low probability of fugitive emissions.	A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance.	A place of business for large scale manufacturing or processing, characterized by large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations.

The Class II Industrial Facility within 300 metres of the Site is the location of the former Waterloo Textiles Limited plant at 215 Queen Street West. It is understood that the industrial uses are no longer operational, but the property remains zoned and designated for industrial employment uses. It is also noted that the Waterloo Textiles Limited plant is subject to active development application(s) which, if fully approved, would remove industrial uses from the site. For Class II Industrial facilities, the D-6 guidelines state a 300-metre potential influence area, and a 70-metre recommended minimum separation distance in which incompatible development should not normally take place.

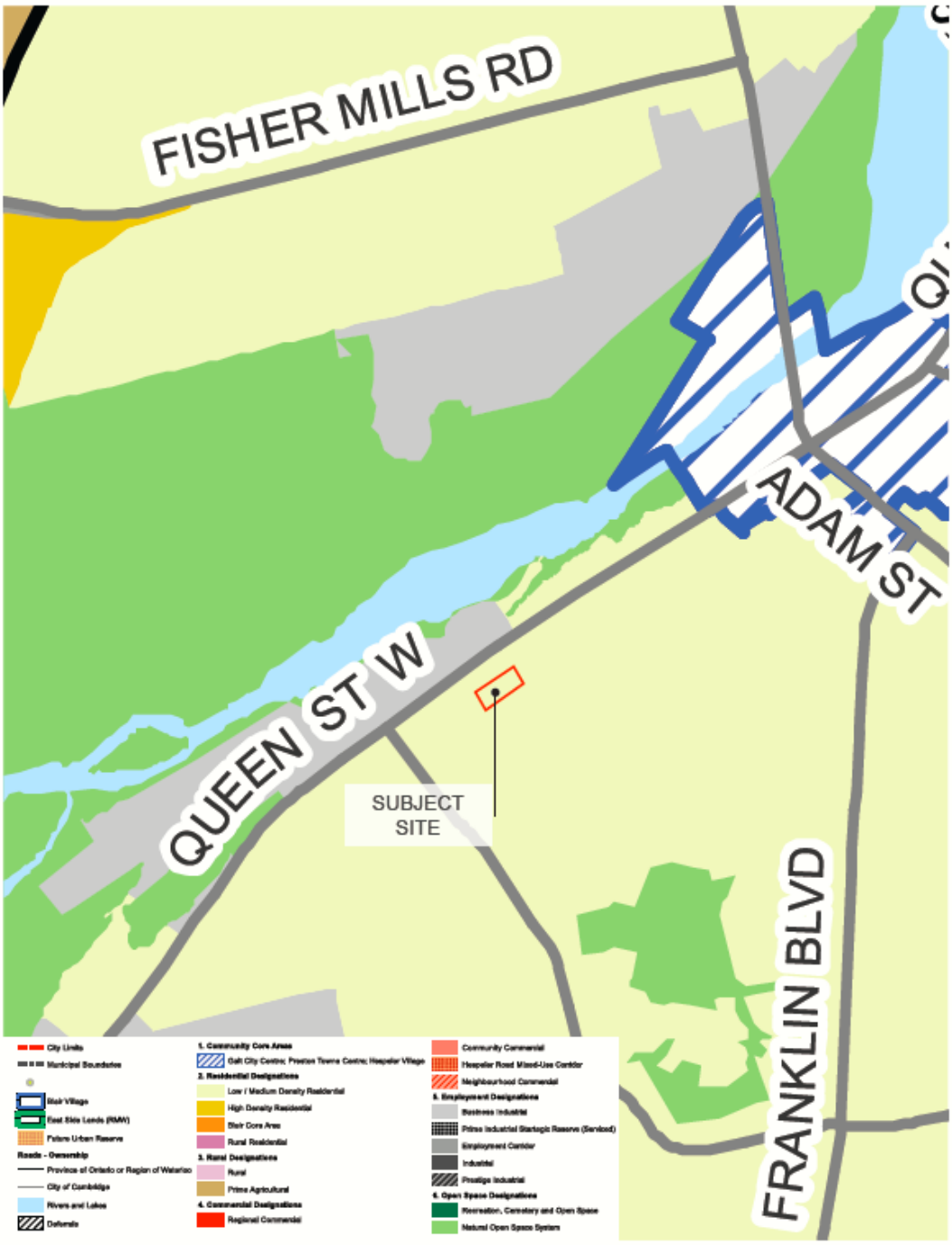
The Site and Proposed Development at 8 Schofield Street is located approximately 160 metres from the nearest point of the property line at 215 Queen Street West, which exceeds the recommended minimum separation distance of 70 metres.

Section 4.10 of the D-6 guidelines recognizes that "*it may not be possible to achieve the recommended minimum separation distances set out in Section 4.3 of this guideline in areas where infilling, urban redevelopment and/or a transition to mixed use is taking place*". This is applicable to the proposed development as it is located within a Regeneration Area which, as noted, is identified in the City's Official Plan as a focus area for intensification within the built-up area of Cambridge (Policy 2.6.1.2). Per the Official Plan, Regeneration Areas as "*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*". Policies for Regeneration Areas anticipate that these areas will transition; it is implied that

during the transition period, these areas will contain a mix of industrially designated lands, and lands designated for sensitive uses such as residential.

As noted in the Record of Pre-Consultation Application, a noise study was submitted with a previous consent application (Application B50/17) titled “Noise Impact Study, Proposed Residential Development, 26 Schofield Street, Cambridge, Ontario” prepared by HGC Engineering Limited dated July 23, 2018. Primary noise sources identified in the study were road traffic on Queen Street West and rail traffic to the north. The study was previously reviewed by the Region and numerous recommendations were accepted such as potential acoustical barriers or replacement of an existing outside condenser, that future dwelling units have central air conditioning in compliance with NPC-300 standards, that floors 2-4 of any building provide sufficient sound mitigation for the dwelling units, and that any double-glazed windows provide adequate sound insultation. Lastly, warning clauses would be required to be included in all Agreements of Purchase and Sale, Lease/Rental Agreements, and the Condominium Declaration for all dwelling units. A Regional Development Agreement (WR1148187) was secured on October 30, 2018 requiring that previously recommended noise mitigation measures will be implemented within the building at the building permit stage, and that warning clauses will be implemented in all Offers of Purchase and Sale/Lease/Rental Agreements and the Condominium Declaration, as applicable.

On account of the Site’s location within a Regeneration Area and it’s focus as an intensification area, the exceedance of the minimum separation distance of 70 metres, and noise mitigation measures to be implemented through the future building permit, it is our opinion that the Proposed Development aligns with the D-Series Guidelines.



GSP group

Land Use Plan

Source: City of Cambridge Official Plan, Map 2 (2018)

Figure 4

GSP group

Regeneration Areas

Source: City of Cambridge Official Plan, Map 8 (2022)

Figure 5

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4.8 City of Cambridge Zoning By-law

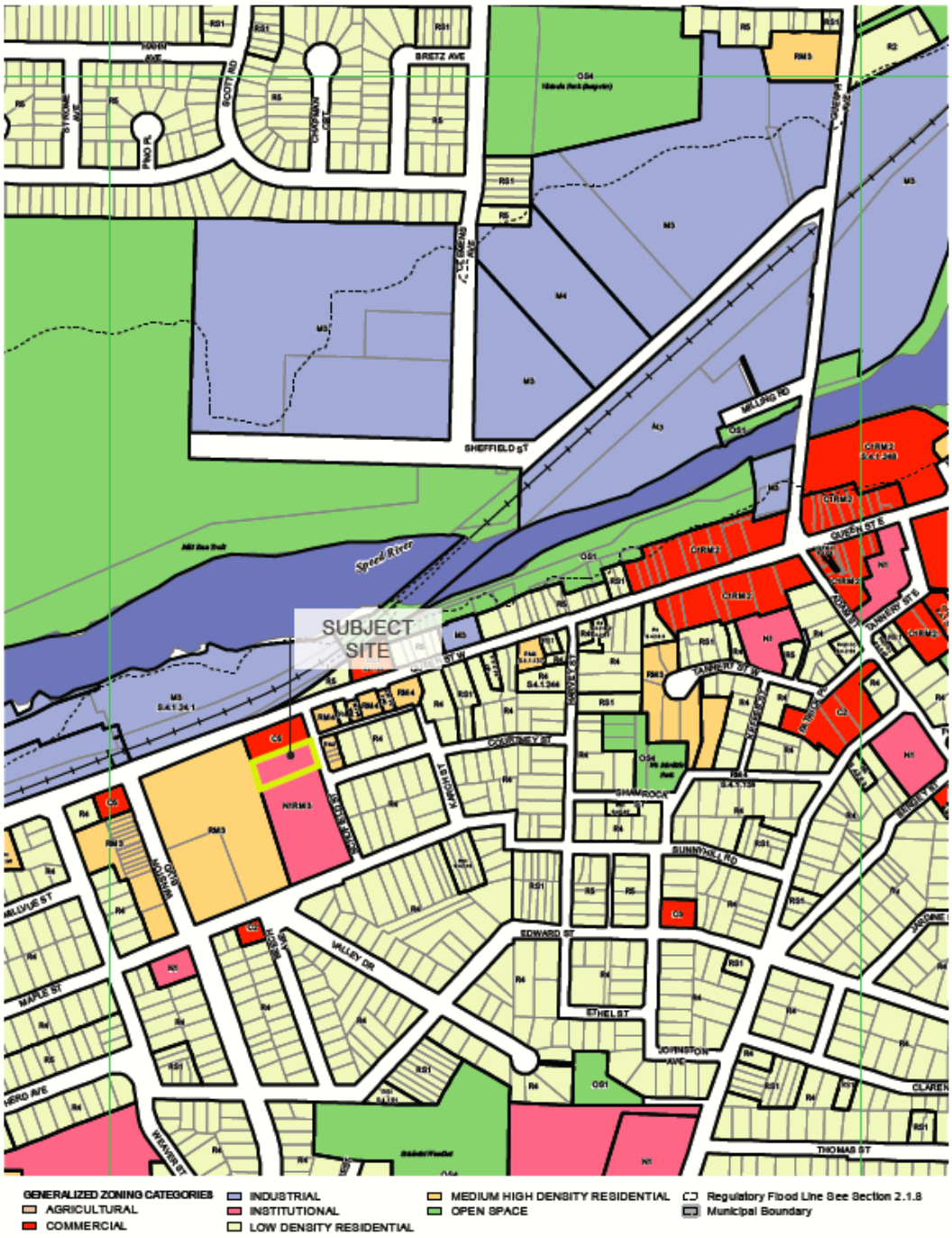
The Site is currently zoned N1RM3 (Institutional/Residential) in the City of Cambridge Zoning By-law, as outlined in Schedule D12 (see Figure 6), which does not currently permit the construction of the Proposed Development. The Site is also zoned in a Regeneration Area, as outlined in the Official Plan and on Schedule Z9 of the City of Cambridge Zoning By-law (see Figure 7).

To facilitate the construction of the Proposed Development, a Zoning By-law Amendment is required to rezone the lands to Residential RM3, which is the appropriate zone for the Proposed Development. The table below outlines the zoning requirements for the RM3 zone and general provisions of the Zoning Bylaw.

Site Development Specifications for Apartment Houses Containing Four or More Dwelling Units in RM3 Zone

Regulation	RM3 Zone	Proposed Development	Complies
Min. lot frontage	30.0m	30.4m	Yes
Max. density (units/hectare)	75.0 units/hectare	393.59	**No**
Min. front yard	6.0m	4.5m	**No**
Min. interior side yard	3.0m for the first 2-storeys, plus 1.5m for each additional storey, to a total required interior side yard of 12.0m (6.0m)	0m (parking structure) 1m (transformer) 4.5m on south side and 4.5m on north side.	**No**
Min. rear yard	3.0m for the first 2-storeys, plus 1.5m for each additional storey, to a total required rear yard of 12.0m (6.0m)	3.0m	**No**
Min. gross floor area per studio unit	As prescribed by the Building Code	44m^2, 45m^2	TBC at Building Permit
Min. gross floor area per one bedroom unit	50.0m^2	60m^2, 62m^2, 64m^2, 66m^2	Yes

Min. gross floor area per unit with two or more bedrooms	60.0m^2	65m^2, 68m^2, 71m^2, 73m^2, 68m^2	Yes
Max. building height	n/a	5 storeys* *additional height to be requested to account for Hydrogeological study findings (refer to Section 5.2 and 6.6 of this Report)	Yes
Max. height of first storey	4.5m	3.2m	Yes
Min. landscaped open space	30%	160m2 / 2185 = 7.3%	**No**
Min. amenity area per dwelling unit	Per bachelor or one-bedroom unit – 20m^2 per unit 71 bachelor / 1 bedrooms = 1,420 m^2 Per unit with two or more bedrooms – 30m^2 15 2-bedrooms = 450m^2 TOTAL = 1,870m^2	Approximately 610 m^2	**No**
General Provisions			
Parking spaces required	1 space per dwelling unit, plus 1 space for each 4 dwelling units for visitors only. (108)	28 tandem spaces for 14 units 64 parking spaces for 72 units 5 visitor parking spaces	**No**
Parking space dimensions	2.9m x 5.5m	2.9m x 5.5m	Yes
Parking aisle	6.0m	6.0m	Yes
Barrier-free parking spaces required	4	4	Yes
Barrier-free parking space dimensions	3.6m x 5.5m	3.6m x 5.5m	Yes



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Zoning By-Law

Source: City of Cambridge Zoning By-Law, Map D12 (2012)

Figure 6

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Regeneration and Transistion Areas

Source: City of Cambridge Zoning By-Law, Map Z9 (2012)

Figure 7

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5. Proposed Applications

The following provides a summary of the proposed Official Plan and Zoning By-law Amendments. Assessment and justification for the proposed applications per the applicable Provincial, Regional and City planning framework is provided in Section 4.0 of this Report.

5.1 Official Plan Amendment

The Subject Application seeks an Official Plan Amendment to add a Site Specific Policy to the Site to:

1. Permit a Floor Space Index of 2.95, whereas Policy 2.8.3.3 permits a maximum FSI of 2.0 within Regeneration Areas; and,

2. Permit an increase in the maximum density of 75 units per hectare which is currently contemplated by Policy 8.4.6.16 for properties within the Low/Medium Density Residential designation which are also located within a Regeneration Area.

The justification for these amendments is provided in Section 4 of this Report.

5.2 Zoning By-law Amendment

The Subject Application seeks a Zoning By-law Amendment to apply Site-Specific Exceptions to the Site to accommodate the Proposed Development. The existing base zoning on the Site – N1RM3 – would remain, and a new Site-Specific Exception would be added. In addition to the justification provided elsewhere in this Report, the regulations contained within the Site-Specific Exception are further justified as follows:

1. Increasing the maximum density to 400 units per hectare, whereas 75.0 units per hectare is permitted.

   Justification: The increase in density is required to permit the Proposed Development. Analysis of the density increase is justified elsewhere this report, including analysis of Policy 8.4.3 of the Official Plan (Locational Criteria for Multi-Unit Residential Development).

2. Decreasing the minimum front yard setback to 4.5 metres, whereas 6.0 metres is required.

   Justification: The reduction is justified due to the constrained lot area and steep grades that limit design flexibility. The development addresses the streetscape with architectural features that enhance the pedestrian experience and work with the site's natural grades. With the main lobby and entrance facing the street, the reduced setback supports an efficient building footprint and optimal unit count without negatively impacting the area's character.

3. Permitting a 0 metre northerly interior side yard setback (parking structure), a 1 metre southerly interior side yard setback (transformer room), and a 4.5 metre minimum setback from interior side yards for the remainder of the building with an allowance for balconies to project up to 2 metres into the required interior side yard.

   Justification: The reduced setbacks account for the unique grading on the site, which slopes significant towards the rear, exposing the rear wall of the underground parking garage and requiring a reduced northerly interior side yard. In addition, a transformer room is proposed in the front yard which also requires a reduced southerly interior side yard setback. These features with the reduced side yard setback are anticipated to have no window openings facing the interior side yard, enhancing privacy with adjacent properties while enabling an efficient underground parking layout and practical location for a transformer room.

   The 4.5m interior side yard setback for the balance of the building maximizes setbacks while optimizing unit counts and accounting for the constraints of the site related to lot area and grading. Permitting balconies to encroach up to 2 metres into the interior side yard will maximize private amenity space for individual dwelling units, which is warranted given the grading and lot area constraints on the property.

4. Decreasing the minimum rear yard setback to 3.0 metres, whereas 6.0 metres is required.

   Justification: The request to reduce the minimum rear yard setback is justified due to the property's lot area and steep grades, which constrain development. The building's design has been articulated to minimize impacts on adjacent properties

by stepping back the massing on the 5th storey which can help address any privacy and shadowing concerns. There are also no rear wall window openings on the 5th storey without a buffer from an outdoor terrace or stairwell. These adjustments allow for efficient use of the Site while supporting the development of housing.

5. Permitting a minimum amenity area per unit of 6 square metres per bachelor or one bedroom unit, and a minimum amenity area of 9 square metres per unit with two or more bedrooms.

   Justification: The reduction in amenity space is justified by the inclusion of private balconies for each unit, a ground-floor amenity space (fitness / party-room), and larger terraces for the upper storey units. These design features ensure that residents have access to both private and shared outdoor spaces, effectively addressing their amenity needs while optimizing the Site's use.

6. Permitting the landscaped open space to be 7% of the lot area.

   Justification: The reduction in landscaped open space can be justified due to the constrained lot area and site grading challenges, as previously outlined. To maximize landscape coverage, planters have been strategically incorporated throughout the Proposed Development. While additional landscaping would likely reduce the number of units on-site, the proposed design remains compatible with the surrounding area. Importantly, a stormwater management report (summarized in Section 6.2) confirms that the Site can meet stormwater targets.

7. For an apartment house, permitting 14 units (16.3% of units) to have 2 spaces per unit located in tandem (28 tandem spaces), 72 units (83.7% of units) to have 0.88 spaces per unit (64 spaces), and 5 visitor parking spaces (1 for every 17.2 units), for a total parking supply of 97 parking spaces for 86 units.

   Justification: As part of the Subject Application, a Parking Study was completed in support of the parking rates requested above. The Parking Study is summarized in Section 6.5 of this report.

8. Permitting a maximum building height of 30 metres.

Justification: There is currently no building height maximum in the zoning. The total height of the building identified on the concept plan from basement to peak of roof is 25.9 metres, of which 5 storeys are visually above grade. Permitting a building height of 30 metres will allow sufficient flexibility to adjust the building, as needed, to account for the water table beneath the site. Refer to Section 6.6 of this report for a summary of the Preliminary Hydrogeological Study.

It is anticipation that additional Site-Specific Exemptions may be flagged through the circulation of the Subject Application with agencies.

6. Supporting Studies

In addition to this Planning Justification Report, additional technical studies and reports have been prepared to further support the Proposed Development. Below is a brief summary of the findings of those reports. They should be reviewed fully in the evaluation of these applications.

6.1 Functional Servicing Report

The Functional Servicing Report was prepared by GM Blue Plan Engineering (dated May 10, 2024) (the “FSR Report”). The purpose of the FSR Report is to identify how the Proposed Development will be serviced, including water, sanitary and storm connections to the existing municipal infrastructure.

The FSR Report concluded the following regarding site servicing:

1. Water service for the Proposed Development will be provided via the extension of a 150 mm diameter water service from the existing 150 mm diameter watermain at the intersection of Schofield Street and Courtney Street
2. The extension of a 150 mm diameter sanitary sewer from the existing 250 mm diameter sanitary sewer on Schofield Street will provide service for the Proposed Development.
3. Storm service for the Proposed Development will be provided via a 300mm storm sewer, which will discharge to the existing 300mm storm sewer on Schofield Street.
4. Storm sewer connection will be provided by a proposed maintenance hole on Schofield Street.
5. Storm sewers (minimum grade of 0.5%) will be installed at a depth of 1.5 metres below the finished grade.
6. Major storm runoff from the site will be conveyed within the limits of the site, ultimately discharging to the Schofield Street right-of-way.

6.2 Stormwater Management Report

The Stormwater Management Report was prepared by GM Blue Plan Engineering (dated May 2024) (the “SWM Report”). The purpose of the SWM Report is to summarize the stormwater management requirements and present a preliminary design configuration, including but not limited to the existing condition drainage area, allowable release rate, post-development condition, routing, water balance, maintenance plan, and sediment and erosion control plan.

The SWM Report concluded the following regarding stormwater management:

- The proposed on-site stormwater management controls will attenuate the post-development runoff for the 5 and 100-year design storm events to the existing condition levels.
- Prior to the construction, a silt fence will be installed along the property boundary in all locations where runoff will discharge from the site to the adjacent lands, which will minimize the transport of sediment off-site during the construction period.
- There is very little runoff from the site that is not from clean surfaces, and as such stormwater quality has not been provided.

6.3 Urban Design Brief

To support the Proposed Development, an Urban Design Brief was prepared by GSP Group, dated April 2024. The report responds to Section 5 of the Cambridge Official Plan which requires that development "*demonstrated a high standard of urban design… that supports the creation of a unique identifiable space while respecting and enhancing out cultural and natural heritage and our unique identity*". The brief notes that the proposed development provides a street-oriented and pedestrian-scale building form that would add an alternative housing option to the surrounding area; considers pedestrians and cyclists by including on-site walkways and bicycle parking; minimizes shadows; and is a more dense and compact form of development which contributes to an efficient built-form in the City of Cambridge. Overall, the Urban Design Brief concludes that the Proposed Development conforms to the Urban Design policies of the City of Cambridge Official Plan, is an appropriate development for the immediate and broader context and reflects principles of good urban design.

6.4 Salt Management Plan

The Salt Management Plan was prepared by GM Blue Plan Engineering (dated April 29, 2024) (the "SM Plan"). The salt management plan presents an overview of the salt management practices to be implemented on the site. A two-phase salt management plan is recommended, with Phase 1 addressing the salt management prior to the construction, and Phase 2 addressing the salt management after the construction is completed.

The SM Plan concluded the following regarding salt management:

- Ploughing of snow as required on the internal roadways and sidewalks following snowfall events or as required to ensure safe passage of motorists and pedestrians.
- Application of sand immediately following ploughing if required, however, the application of sand is not required after each snow clearing operation.

- Salt/sand will not be applied unless ice conditions develop, with the recommended salt/sand mixture being 25% salt and 75% sand.
- The application of salt/sand, including frequency and concentration, will be monitored by the Owner.
- Storage of all ploughed snow is to be in an area appropriately designed for snow storage to minimize the impact of salt/sand on the environmental features, to a height which will not block the view of motorists and pedestrians and will not impede surface drainage.

6.5 Parking Study

A Parking Study was prepared by Paradigm Transportation Solutions Limited for the Proposed Development. The study includes a review of existing conditions, zoning by-law requirements, parking demand estimates, and on-site vehicle circulation, and provides potential Transportation Demand Management (TDM) measures. The development plan involves a five-storey building with 86 units and a total parking supply of 97 spaces, including 14 tandem spaces, averaging 1.127 spaces per unit.

The study concludes that while the development requires 108 parking spaces to meet the City's Zoning By-law, the proposed supply of 97 spaces presents a shortfall of 11 spaces. However, based on parking demand forecasts from multiple sources—including local auto ownership rates, ITE Parking Generation Manual, and proxy site data—the estimated maximum parking demand ranges between 43 and 95 spaces. The study recommends that TDM measures such as bicycle parking, car share spaces, and unbundling parking spaces be implemented to support the reduced parking supply. This would support a parking supply of 14 units with 2 spaces per unit (28 spaces) and 72 units with 0.88 spaces per unit (64 spaces) for an average of 1.127 spaces per unit (97 parking spaces) including 5 spaces marked for visitors.

6.6 Preliminary Hydrogeological Assessment & SWP Contamination Study

A scoped hydrogeological study and source water protection potential contamination study was completed by Chung & Vander Doelen Engineering Ltd. (CVD). The purpose of the hydrogeological investigation was to evaluate existing groundwater conditions and provide a preliminary hydrogeological assessment along with construction dewatering recommendations in support of the Proposed Development. The purpose of the source water protection study was to summarize site groundwater conditions and the potential for groundwater contamination due to past or present site activities.

The Site is primarily underlain by granular deposits ranging from sand to silty sand to sand and gravel which typically contain a small clayey silt layer near the bottom of the deposit.

These subsoils overlay limestone/dolostone bedrock of the Guelph Formation aquifer. Groundwater level elevations recorded during previous site visits corresponded to elevations between 290.50 and 294.29 metres. With the current building design, temporary construction dewatering will be required for basement and foundation work, with expected groundwater flow below 400,000 L/day. Based on a previous Phase Two ESA, soil and groundwater at the Site was found to meet the applicable Table 2 site condition standards for residential use.

The Site is located within Wellhead Protection Area B zone of the Hespeler wellfield, denoting an area in which the groundwater travel time to the wellfield is 2 years or less, and having a vulnerability score of 8. The post-development Intrinsic Susceptibility Index (ISI) falls within the Medium-Risk category (ISI = 30 to 80). Based on the findings from the Phase Two ESA, there were no contaminants identified in the soil or groundwater and concentrations of all tested parameters in the soil and groundwater samples collected for laboratory testing were non-detectable or below applicable Table 2 standards. No potential for preferential pathways to affect contaminant distribution were found.

With the Proposed Development, there are anticipated increases in de-icing salt use and reduced groundwater recharge from decreased pervious surfaces, though impacts are expected to be minor relative to surrounding urban areas. Temporary construction dewatering of the shallow aquifer is expected but is unlikely to impact the Hespeler wellfield due to the large vertical separation of aquifers and the relatively low volume of groundwater removal.

The proposed residential development is not expected to pose a significant groundwater contamination risk, as no on-site contaminants were identified in the Phase Two ESA and RSC, the excavation remains mostly within the overburden aquifer, and a significant bedrock buffer separates it from municipal wells, though potential contamination from underground parking (e.g., fuel leaks, salt runoff) may impact groundwater.

Additional groundwater monitoring is ongoing and an addendum to the report will be provided at the completion of a 1-year groundwater monitoring program. It was also recommended that CVD be retained to review the final design when the finished floor elevations are finalized, and a site grading plan is available. Refer to the report for full findings and recommendations.

Based on the findings of the study and the ongoing monitoring, the Owner anticipates raising the building to further separation to the water table. This change will occur during detailed design. Additional building height is proposed in Section 5.2 of this Report to account for this change.

7. Public Consultation Considerations

Upon acceptance and circulation of the application package in support of the Proposed Development, the City requires the posting of Notice of Application sign(s) to inform surrounding property owners of the Proposed Development. GSP Group and Ram Chandrer commit to post the required signage promptly with a clear, unobstructed view from the street and agree to maintain the sign throughout the duration of the processing of the applications by the City.

While a Neighbourhood Information Meeting was not identified as a requirement through pre-submission consultation with the City, GSP Group and Ram Chandrer are agreeable to the scheduling of an information meeting or open house, as deemed appropriate by the City, as well as any additional informal public meeting(s), open house meeting(s) and/or neighbourhood meetings required by the City.

The proposed Official Plan and Zoning By-law Amendments require a Statutory Public Meeting in accordance with the *Planning Act* R.S.O. 1990, c. P.13. GSP Group and Ram Chandrer will attend the public meeting as scheduled by the City and give a formal presentation regarding the Proposed Development and associated applications, as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow-up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation process to City and Regional staff for their review and consideration prior to the preparation of a final staff report and recommendation on the OPA/ZBA.

8. Conclusion

GSP Group has been retained by Ram Chandrer to provide planning justification in support of the Proposed Development of the property at 8 Schofield Street which includes the development of an 86-unit, 5-storey apartment building.

The Site is currently designated Low/Medium Density Residential in the City of Cambridge Official Plan and is zoned N1RM3 (Institutional/Residential) in the City of Cambridge Zoning By-law. Applications for an Official Plan Amendment to permit increased density, and a Zoning By-law Amendment to add a Site-Specific Exception for increased density and for relief from built-form zoning regulations which are required to facilitate the Proposed Development.

This Planning Justification Report has undertaken a policy review and concludes that the proposed Official Plan and Zoning By-law Amendments are appropriate and represent good planning for the following reasons:

- The Proposed Development is consistent with the policies of the PPS and conforms to the Growth Plan as it represents residential infill intensification that makes efficient use of the existing Site, and infrastructure, and provides a range and mix of housing options for residents within the Hespeler neighbourhood and broader City of Cambridge.
- The Proposed Development conforms with the ROP as it will assist the Region in achieving the minimum intensification targets for new residential development and meets the policy objectives for new development in the urban area as well as housing. Additionally, its Regeneration Areas designation supports the intensification and introduction of residential development.
- The Proposed Development conforms with the general intent of the Official Plan and Zoning By-law as it supports redevelopment and intensification toward the City of Cambridge's population targets for 2031.
- The Proposed Development permitted by the applications will provide for the development of a site located within a Regeneration Area in the City's Built-Up Area.
- The Proposed Development aligns with the D6 guidelines for land use compatibility by being located in a transitioning area, exceeding the minimum separation distance, and having noise mitigation measures that will be implemented at the time of building permit.

- As outlined in the Urban Design Brief, the Proposed Development conforms to the design policies of the City's Official Plan and is an appropriate development for the immediate and broader context and reflects principles of good urban design.
- Approval of the Proposed Applications will permit development that is appropriate and compatible in this urban context.

In summary, the Proposed Development will result in a suitable form of intensification, benefit the community, and represents good planning.