

Breanna Syne

From: vlabreche
Sent: Thursday, April 17, 2025 12:11 PM
To: Bryan Cooper
Subject: Proposed New Comprehensive Zoning By-law
Attachments: New Comprehensive Zoning By-law- Public Meeting Notice.pdf; Current Zoning Map grid H15 as of April 2025.png; Proposed new zoning map grid H15_April 2025.png; Screenshot 2025-04-17 085426.png; Screenshot 2025-04-17 090248.png; GRCA Environmental Constraint Mapping as of April 2025.pdf

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Good morning Bryan, longtime I have not spoken with you, I hope you are keeping well.

Even though I am sending you this e-mail from [REDACTED] I want to speak with you about my home/property in Cambridge marked with a blue line on the second attachment, address is [REDACTED]

In reviewing the available material on-line as noted in the attached notice, I have concerns with the EP zone proposed on about the back 1/3rd of my property (see 3rd attachment). Current Zoning Map (2nd attachment) has no environmental zoning on it, and also the same case for my neighbours properties. I see as noted on the 4th attachment, it states in 12.1.1: *“The EP Zone applies to lands that are identified as Core Environmental Features in the Official Plan.”* I marked an X in red where my property is located on the related OP mapping, there is no Core Environmental overlay designation on my property or other properties on Cedarbrook Court. Also, see last attachment, there is no GRCA constraint features over my property and other properties on the south side of Cederbrook or north side of Stonebrook Road.

At this point, I do intend to attend the public meeting to state my concerns, and I will also provide you and cc clerks dept a related written submission next week on this matter. I also feel compelled to speak to my immediate surrounding neighbours about this. I would like to speak with you about this before I send in a letter. Please advise when you would have 10-15mins available to chat. I am available from 1:30pm to 3pm today, next week anytime on Monday, anytime Tuesday morning or Wednesday afternoon anytime.

Thank you Bryan for your considerations and I look forward to speaking with you again.

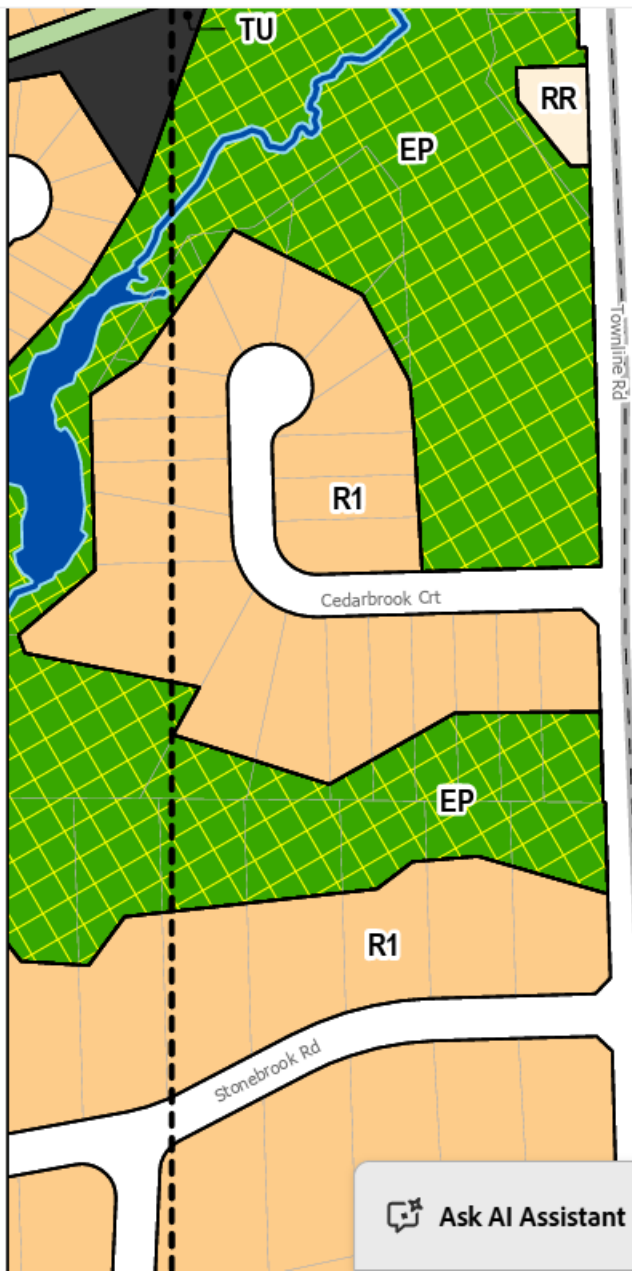
Victor Labreche, MCIP RPP

H14



ONLINE RD - REG RD-33

H14



 Ask AI Assistant

Simplify this document for me



Part 12.0 – Environmental and Open Space Zones

12.1 Purpose Statements

12.1.1 Environment Protection (EP) Zone

The EP **Zone** applies to lands that are identified as Core Environmental Features in the Official Plan.

12.1.2 Open Space One (OS1) Zone

The OS1 **Zone** applies to lands that are in public ownership and used for public open space purposes.

12.1.3 Open Space Two (OS2) Zone

The OS2 **Zone** applies to private lands that are used for private open space uses.

12.1.4 Open Space Three (OS3) Zone

The OS3 **Zone** applies to lands that are used for **cemetery** purposes.

12.2 Permitted Uses

Permitted uses are listed in Table 12.2 with the use of the letter 'P'. If a listed use is not permitted in a **zone**, this is shown with a 'NP'. A number beside a 'P' indicates that a special provision at the bottom of the table applies.

Table 12.2 – Permitted Uses in Environmental and Open Space **Zones**

	Use	EP	OS1	OS2	OS3
1.	Agricultural use (only existing buildings and structures permitted)	P	NP	NP	NP
2.	Cemetery	NP	NP	NP	P



BISHOP ST N

CAN-AMERA PKY

N

SAGINAW PKY

COWAN BLVD

AVENUE RD

FRANKLIN BLVD

GLAMIS RD

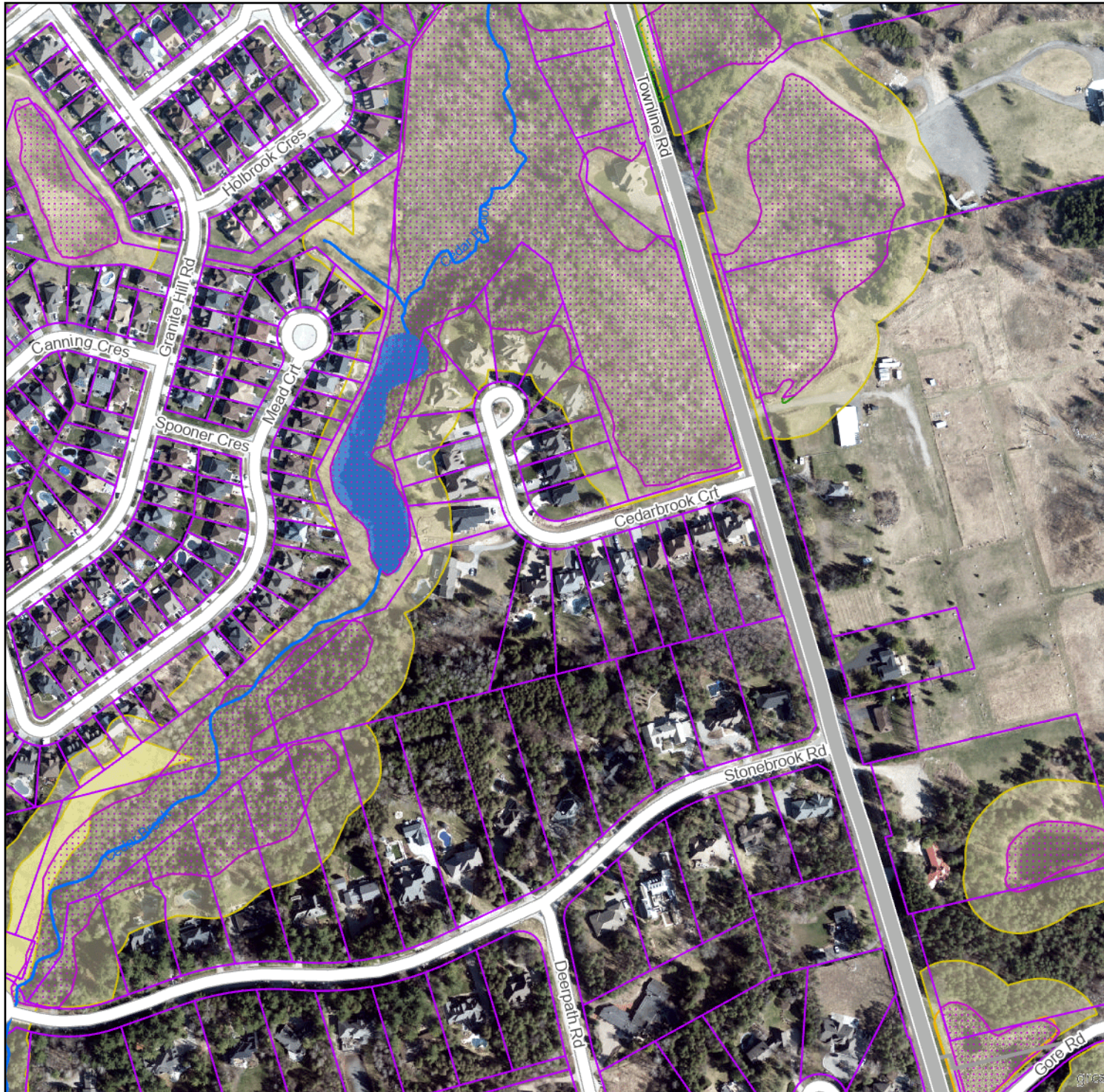
Cedarbrook Creek

Mill Creek

Beverly



GRCA Web-GIS



Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)
 - Engineered
 - Estimated
 - Approximate
 - Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
 - Steep
 - Oversteep
 - Toe
- Slope Valley (GRCA)
 - Steep
 - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Wetland (MNRF)
 - Provincially Significant
 - Locally Significant
 - Unevaluated

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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user. The source for each data layer is shown in parentheses in the map legend. See Sources and Citations for details.

Breanna Syne

From: Jonathan Cheng <[REDACTED]>
Sent: Thursday, April 17, 2025 10:40 AM
To: Karin Stieg-Drobig
Cc: Bryan Cooper; Breanna Syne
Subject: RE: City of Cambridge- Draft New Comprehensive Zoning By-law and OP Amendment Public Meeting

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Good morning,

We received the public notice below for the upcoming statutory public meeting on May 6, 2025.

Can you please confirm what the deadline is for submitting written comments and requesting to speak at the meeting—as well as where such requests should be sent to.

Thank you,

Jonathan

Jonathan S. Cheng

[REDACTED]
[REDACTED]
[REDACTED]

From: Karin Stieg-Drobig <StiegDrobigK@cambridge.ca>
Sent: Wednesday, April 16, 2025 3:52 PM
Cc: Bryan Cooper <CooperB@cambridge.ca>; Breanna Syne <syneb@cambridge.ca>
Subject: City of Cambridge- Draft New Comprehensive Zoning By-law and OP Amendment Public Meeting

Good Afternoon,

Please find attached Notice of Public Meeting- Draft New Comprehensive By-law and companion Official Plan Amendment. You are receiving this notification as you have previously indicated that you wished to be informed of this item. Please contact the undersigned if you wish to be removed from the mailing list.

Kind Regards,

Karin Stieg-Drobig (She/Her)
Administrative Service Representative
Community Development - Planning Services
P: (519) 513-6459
www.cambridge.ca



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Stikeman Elliott LLP Barristers & Solicitors

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Breanna Syne

From: Valerie Cameron [REDACTED]
Sent: Wednesday, April 30, 2025 2:48 PM
To: Bryan Cooper
Subject: Comprehensive+Zoning+By-law+New+Mapping+Link+-+June+2024
+Reduced+File+Size.pdf

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Hi Bryan

Again, I appreciate having the opportunity to speak with the City Planners in regard to the proposed Form Base By-law Zoning change for the Official Plan.

At the meeting you had asked me about what section of Markham's Official Plan I was referring to. It was the section on Established Residential Neighbourhoods. Here is the link that I was using below.

<https://www.markham.ca/sites/default/files/2024-06/Comprehensive%2BZoning%2BBy-law%2BNew%2BMapping%2BLink%2B-%2BJune%2B2024%2BReduced%2BFile%2BSize.pdf>

I do appreciate your openness to other ideas. Enjoy the rest of your day.

Kindest Regards,
Valerie

Breanna Syne

From: Bryan Cooper
Sent: Wednesday, November 26, 2025 11:03 AM
To: Bryan Cooper
Subject: FW: Public Engagement New Form Base By-Law Zoning

Bryan Cooper
Senior Planner - Policy
Planning and Growth - Planning Services
P: (519) 513-6441
www.cambridge.ca



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From: [REDACTED]
Sent: Sunday, May 4, 2025 9:34 AM
To: Mike Devine <devinem@cambridge.ca>; Corey Kimpson <kimpsonc@cambridge.ca>; Ross Earnshaw <earnshawr@cambridge.ca>; Sheri Roberts <robertss@cambridge.ca>; Adam Cooper <coopera@cambridge.ca>; Scott Hamilton <hamiltons@cambridge.ca>; Nicholas Ermeta <ErmetaN@cambridge.ca>; Office of Mayor and Council <mayor@cambridge.ca>
Subject: Public Engagement New Form Base By-Law Zoning

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Hello,

Be the Visionary for our Community!

Recently, I read an article in the Cambridge Today about Public Meetings (3) that were to take place in April 2025. The Public Meetings were to inform all residents in Cambridge in regard to the new Proposed Form Base By-law Zoning for Residential Neighbourhoods, to be included in the Revised Cambridge Official Plan, for future growth in Cambridge. I attended the Galt meeting on April 16th, 2025. At this meeting on the 16th there were a total of 10 people at the meeting. Out of the total of 10 people in

attendance there were 4 residents, 2 developer representatives. The other remaining 4 I do not know what their status was.

On further investigation after this pitiful attendance, I discovered that Social Media and engagewr cards were mailed to inform the public. This is **not enough** or a reliable way to advertise such a significant project for the City's future. Various other means of advertising were suggested by us. The Official Plan spans a period of 50 years. This will affect our children, grandchildren and future generations to come.

Since the meeting on April 16th, Deb Fee and I have since met with Senior City Planners on April 30th, 2025 with our concerns. We have asked that a **Working Group** be assembled to work with the City staff. This project for Residential Neighbourhoods is not compatible as stated in reports.. We both have Registered to speak at the upcoming meeting on May 6th. This is not a new endeavor for us as we met with Mayor Jan Liggett back in March of 2024 with recommendations for Residential Neighbourhoods with significant material on how to move forward for Residential Zoning Protection.

Since this meeting on April 30th, 2025, I have conducted a random sampling of residents of Cambridge in regard to their knowledge of this project. Roughly speaking 50 residents responded verbally from all 3 areas of the community. They were asked these questions.

1. Were they aware of the engagewr website? Answer: No
2. Did they know that information about Cambridge could be found on this site? Answer:
No
3. Were they aware of the proposed Form Base By-law Zoning change for the Official Plan? Answer: No
4. Did they know what Form Base By-law Zoning for Residential development is? . Answer:
No
5. How will this proposed Zoning affect their properties? Answer: No

Due to this lack of Public Input for this project, with it's long term effect on our Community, that Council approve that a Working Group be created with interested resident stakeholders.

Thank you for taking the time to read this communication. Looking forward to meeting you at the Planning meeting.

Best Regards,

Valerie Cameron

Breanna Syne

From: Valerie Cameron <[REDACTED]>
Sent: Thursday, May 8, 2025 2:15 PM
To: Jan Liggett; Helen Shwery; Mike Devine; Corey Kimpson; Ross Earnshaw; Sheri Roberts; Adam Cooper; Scott Hamilton; Nicholas Ermeta
Cc: Bryan Cooper; David Calder
Subject: Proposed Form Base By-law Zoning Established Residential Neighbourhoods

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Hello,

At the May 6th, 2025 Planning Meeting, I appreciated the opportunity to speak to Council in regard to developing protection guidelines in Legacy/New Residential Established Neighbourhoods. Legacy areas may not have the historical merit as Dickson Hill, but still have unique characteristics worthy of preserving and protecting within our Community.

However, this does not mean growth is not possible. Growth should be measured, balanced and visionary. Not following the current "Trend" as stated. Trends come and go. Cambridge needs our own "Made In Cambridge" Official Plan, that preserves our history, heritage and uniqueness. This will require thoughtful and visionary collaboration with the whole community.

At the meeting, it was suggested that advertising be expanded utilizing more than social media. Some suggestions are:

Staff: Attending Community Functions/Events/Activities

At these different events, staff should **speak** directly to the public explaining this Zoning Proposal, not just handing out information pamphlets. Once explained then give a pamphlet, while noting response.

Insert: Billing Mail to residents. Must be clear, it is from City Hall and the long term Plan.. Be specific Neighbourhood Zoning

Newspaper: Advertising must capture readers attention as it is not published in local papers. "Public Workshop" is not acceptable.

CTV: Explore a post on Kitcheners Community page that runs at 5:00, I believe this is free.

At the end of the Planning Meeting for Form Base Zoning, it was stated that the Advisory Committee is to be consulted. Exactly what does this mean? Will Council not consider a working group consisting of Residents, Historical, Accessibility Committee and 2 Councillors? Will the Public Information deadline be extended to provide sufficient time for enhanced advertising to be distributed?

I appreciate your time and assistance in developing a "Made for Cambridge" Official Plan.

Best Regards,
Valerie Cameron

Breanna Syne

From: Philip Boulos <[REDACTED]>
Sent: Friday, April 25, 2025 4:44 PM
To: Bryan Cooper
Subject: Request for Draft Official Plan Amendment
Attachments: Notice of Public Meeting - Draft New Comprehensive Zoning By-law and companion Official Plan Amendment (May 6, 2025) (02495818xCDE1C).pdf

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Dear Mr. Cooper,

I hope this email finds you well.

I am writing about the **Notice of Public Meeting scheduled for May 6, 2025**, regarding the City of Cambridge's draft new Comprehensive Zoning By-law and the **accompanying Official Plan Amendment**. I would appreciate it if you could provide a copy of the **draft Official Plan Amendment**, as referenced in the notice, along with any additional information or background materials currently available.

Thank you for your time and assistance.

Philip Boulos

Co-op Planning Student



Davies Howe LLP

The Tenth Floor, 425 Adelaide Street West

Toronto, Ontario M5V 3C1

416.977.7088

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Breanna Syne

From: Jameson Pickard <[REDACTED]>
Sent: Tuesday, April 29, 2025 3:15 PM
To: Bryan Cooper
Subject: Re: Form Based Zoning
Attachments: image001.png

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Hi Bryan, thanks for following up with me on this . It is much appreciated.

Apologies I couldn't stay for the whole Charette. I appreciated the developer voice in the room but not sure I agree with substantial parking reductions across the board. I see other municipalities considering reduced standard based on proximity to transit. This seems like a reasonable alternative.

I am also not seeing any exterior side yard setbacks in the Residential Zones in the Draft by-law is intentional?

Thanks again Bryan.

Jameson

On Tue, Apr 29, 2025, 1:54 p.m. Bryan Cooper <CooperB@cambridge.ca> wrote:

Hi Jameson

Thanks for your participation at the workshop the other week.

I'm following up on the transportation questions you had for the Queen/Holiday Inn development. The City is initiating the Neighbourhood Traffic Assessment in the spring/summer of this year. The site specific Traffic Impact Study (TIS) has not been initiated yet. The intent is for that study to be completed after the City's assessment is completed.

Thanks

Bryan

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
P: (519) 513-6441

From: Jameson Pickard <[REDACTED]>
Sent: Tuesday, April 15, 2025 9:38 AM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Re: Form Based Zoning

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Thanks for the Update Bryan. I appreciate the information and you following up with the traffic group on the status of the study.

Jameson

On Mon, Apr 14, 2025, 10:45 a.m. Bryan Cooper <CooperB@cambridge.ca> wrote:

Hi Jameson

I've followed up with our transportation group on any forthcoming traffic study for the area and will let you know. I know with the development application at [REDACTED] that as part of the approval, a holding provision was applied that requires a Transportation Impact Study and neighbourhood traffic assessment to be completed. I will find out the status of this, I'm not aware of it being completed to date.

Queen St/Goebel Ave is within a Community Node which is intended for higher density mixed uses developments. The form based zoning project will not apply to these high growth areas.

In terms of forecasting, the expectation is that most of the City's growth to 2051 will be focused in major growth areas like the Hespeler Rd corridor, community nodes, downtown areas and greenfield areas. We don't have a specific estimate for level of housing that the form based zoning will result in. It's really about allowing incremental housing change in neighbourhoods.

Look forward to connecting on the 17th if you can make it.

Bryan

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
P: (519) 513-6441

From: Jameson Pickard [REDACTED]
Sent: Monday, April 7, 2025 11:25 AM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Re: Form Based Zoning

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Thanks for the information Bryan, It's helpful.

Have you estimated the level of housing these changes will yield across the City and more specifically in Hespeler? I am interested, as there are several significant developments approved/proposed in Hespeler and traffic has been a concern for me. The area already has challenges and I was told during the Queen St/Goebel Ave development consultations that a broader traffic study was going to be undertaken to evaluate the transportation network in Hespeler. I'm not sure if a study has been undertaken at this time.

I will try to make the April 17 open house at the Scout House. I will take some time to think about the compatibility component.

Thanks again.

Jameson

On Fri, Apr 4, 2025 at 2:51 PM Bryan Cooper <CooperB@cambridge.ca> wrote:

Hi Jameson

Thanks for your questions on this project.

As a bit of background info, the City has been working on a comprehensive zoning by-law review for a number of years. The form based zoning aspect for residential zones is a relatively new sub- project that is being integrated into the overall zoning by-law review.

Question 1 – Established Neighbourhoods

The basis of the established neighbourhood zones came out of previous work done for the comprehensive review. At this time we are planning on including these regulations. Some of the factors that went into this original work included:

- Construction date – neighbourhoods built prior to the 1950s
- Large proportion of properties having detached rear yard garages
- Neighbourhoods served by laneways (e.g. West Galt area)
- Majority of residences being of a consistent height, typically one or two stories
- Majority of residences have a setback consistent with adjoining properties – front yard, interior side yards etc.

These are some of the criteria that were used to develop the established neighbourhood regulations. Note that the established neighbourhood areas are still subject to the form based regulations that we are looking to develop. Its essentially an overlay zone with some additional regulations.

Question 2) Traffic, compatibility etc.

The form based zoning will allow for small scale infill type development (at this time we are considering 3-4 storey building heights for most areas subject to the form based zoning – this is the draft R1 and R2 Zone). This type of development normally wouldn't trigger site specific traffic studies since the number of cars generated would not meet a threshold for study.

The draft R3 zone is intended for taller buildings, and is only for areas already designated for high density residential in the OP. There are not a lot of properties that will fall within this zone. A development in the R3 zone would require site plan approval and there is the ability through that process to require traffic studies if warranted.

Attached is Map 2 of our OP which shows the land uses designations in the City. The scope of the form based zoning is primarily the yellow "Low/Medium" and orange "High Density" areas. As you can see most of the City is in the low/medium which is the 3/4 storey zones we are proposing.

In terms of compatibility, that's really what we want to hear from the public on through this engagement – what do people think of the base standards we are developing? Our consultant is preparing a number of demonstration plans showing what could potentially be developed on various lot sizes to guide discussion and get feedback.

If you can't make any of the open houses we will be posting this material on the engage site as well and you can send in feedback.

3) Amendments – yes anyone can still apply to amend these regulations. The expectation is that there will be less need for site specific amendments if what is being proposed is approved.

Happy to discuss if you have any other questions.

Thanks

Bryan

.

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
P: (519) 513-6441
www.cambridge.ca



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From: Jameson Pickard <[REDACTED]>
Sent: Thursday, April 3, 2025 1:51 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Form Based Zoning

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Hi Bryan,

My name is Jameson. I live in Hespeler and I am also Planner for full transparency.

I just had a couple questions related to the form based zoning proposal that is being considered:

1) What was the criteria used by the City to identify "established neighbourhoods"?

2) I am unclear how site-specific issues related to traffic, compatibility etc. will be addressed in this new form based zoning framework, when a person can get building permit and build any form of housing provided they meet the prescribed "box". In the traditional rezoning process you could require relevant assessments and implement mitigating measures to ensure infill development would be appropriate for the site.

3) Can you still apply to amend this form of zoning and change the zoning provisions?

If a quick phone call is easier I would be happy to chat.

I'm interested from a planner and resident perspective!

Thanks,

Jameson [REDACTED]

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Breanna Syne

From: Bryan Cooper
Sent: Wednesday, November 26, 2025 10:31 AM
To: Bryan Cooper
Subject: FW: Zoning...
Attachments: cityofcambridgeloogo_3bd247c5-9b79-4597-978f-1686babfdf80.png

Bryan Cooper
Senior Planner - Policy
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----- Original message -----

From: Pamela Lunney [REDACTED]
Date: 2025-05-01 10:26 a.m. (GMT-05:00)
To: Sheri Roberts <robertss@cambridge.ca>, Jan Liggett <liggettj@cambridge.ca>, [REDACTED] Nicholas Ermeta <ErmetaN@cambridge.ca>, John Lysnes [REDACTED], Tony Spagnola <[REDACTED]>
Subject: Zoning...

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Good Morning all,

I was very disappointed to hear that the city will allow dense intensification moving forward without input from existing residents in affected areas.

I filled out the survey online and would like to elaborate.

The zoning changes to streamline the process robs residents of the option to be heard and fight, over population in their communities. This is simply wrong.
It does however help investors and developers.

This is a sad reality and in my opinion, it is irresponsible for the city to do this. Residential areas will most certainly be negatively impacted and property values will plummet for these unfortunate folks.

The influx of people and cars will rob residential areas of trees, quiet and beauty.

Within the survey are questions addressing parking. Suggestions are offered; side yards, back yards, street parking?

Stated options to mitigate the most certain process of creating a concrete jungle, are landscape buffers. Who will regularly monitor and enforce maintenance of same? Who will supply personnel and their paychecks to do this?

On street parking in Residential areas, NEVER DESIGNED for the tsunami of cars and people is a dangerous option but unavoidable with overcrowding.

We already have a problem with excess speed on our residential roads. Adding lack of visibility for motorists, pedestrians, cyclists and children is deadly. How will this be managed?

I would respectfully suggest that unless a community is designed for MUCH denser zoning from the beginning, these ideas are tantamount to overcrowding, devaluing existing homeowners properties/equity, degradation of communities, noise, lack of trees, beauty and dissatisfaction.

I will be interested to hear how these questions will be answered and how real, ongoing workable solutions will be managed moving forward.

Thank you for your time.

Pamela Lunney-Spagnola

██████████
██████████

Breanna Syne

From: Pamela Lunney [REDACTED]
Sent: Wednesday, May 7, 2025 11:17 AM
To: Sheri Roberts; Nicholas Ermeta; Jan Liggett; [REDACTED]; Bryan Cooper
Subject: Zoning change meeting last evening (May 6, 2024)

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Good Morning all,

Thank you all for your attention to this matter. It's a huge issue.

A few take aways from last night; the need for clear and ongoing advertising for all citizens on this issue.... I was pleased that council was receptive and wanting to make this happen! Mayor Liggett's suggestions of cards being sent out or inserts included in billing were solid suggestions and will really help along side of other great suggestions.

The voicing of delegates that zoning changes will remove residents ability to fight for the equity they have built in their homes and the very real possibility of plummeting property values was giving voice to everyone's reasonable concerns. I really don't think this can be stressed enough! We collectively need to prevent this from happening.

Our city growing is a reality and brings positives too, we just need to be mindful of how that growth happens. Creating overcrowding or clogging residential roads with a tsunami of cars they were never designed to carry is not the way of course. Creative planning and thought will mitigate these very real possibilities and keep our city a place people want to visit and call home.

Planning higher density areas from the ground up create an opportunity to design roadways to carry people and cars much more efficiently and SAFELY. Additionally, keeping intensification in line with already established neighborhoods is key. In neighborhoods where homes are almost entirely bungalows, requiring builders to adhere to a height no greater than two stories (and accompanying parking) keeps the charm and beauty. It rewards residents who for years have lovingly maintained their properties, arguably contributing to the positive impact and encouraging people to make their home here.

Again, I'm so grateful council is listening....being the voice of their constituents and not the voice of builders!

Thank you.

Dialog will no doubt continue and I look forward to the solutions we hammer out as a unified voice!

Have a lovely day.

Pamela Lunney
Cambridge, Ontario

Breanna Syne

From: Kevin Hird [REDACTED]
Sent: Thursday, June 19, 2025 1:30 PM
To: Bryan Cooper
Subject: New Zoning By-law - Beacon Baptist Church - [REDACTED], Cambridge

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Good afternoon, Bryan,

My name is Kevin Hird and I am emailing you on behalf of Beacon Baptist Church in Cambridge. The church address is [REDACTED], Cambridge.

The church's property is currently zoned **(F)N1RM3** and based on the draft zoning this would change to **I**.

The reason for my email is to communicate the church's position that the zoning change as presented would severely limit any future use of the land.

Beacon Baptist Church would like to request that an exception be made that would allow the property's current zoning to remain following the completion of the zoning by-law review.

Please let me know what the next steps would be for Beacon Baptist Church in regards to this matter.

Thank you.

Kevin Hird
Treasurer, Deacon, and Trustee
Beacon Baptist Church
[REDACTED]

Breanna Syne

From: Breanna Syne
Sent: Tuesday, June 24, 2025 1:55 PM
To: T Williams
Cc: Nicholas Ermeta; Bryan Cooper
Subject: RE: Concerns with new proposed Form Based Zoning By-law - [REDACTED] and a question

Hi Tracy,

Thank you for sharing your concerns and thoughts about the City's draft new zoning by-law.

In response to the zoning of [REDACTED]:

- The current zoning is R5 while the surrounding streets are zoned R4. The R4 and R5 zones are similar permitted uses and regulations, but R5 recognizes smaller lots compared to R4 regarding lot area, lot frontage and gross floor area.
- Similarly, [REDACTED] is draft zoned R2 while the surrounding streets are draft zoned R1, which also recognizes smaller lot frontages, which are predominantly less than 15m.
- **Staff will be further reviewing the proposed regulations for all residential zones**

Regarding your concerns, I can follow up with by-law to see the status of your complaints.

Thanks,

Breanna Syne
Planner
Community Development - Planning Services
P: (519) 513-6461
www.cambridge.ca



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From: T Williams [REDACTED]
Sent: Monday, June 23, 2025 1:32 PM
To: Nicholas Ermeta <ErmetaN@cambridge.ca>; Breanna Syne <syneb@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>
Cc: T Williams [REDACTED]
Subject: Concerns with new proposed Form Based Zoning By-law - [REDACTED] and a question

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Hello Nicholas, Breanna and Bryan,

My name is Tracy Williams and I am a long time home owner who has lived at [REDACTED] in Cambridge for 19 years.

I was born and raised in Kitchener and have lived in the Waterloo Region my entire life.

I am a certified professional accountant with longstanding work experience in our business and public sector communities. I am an active member of the community having been a volunteer with the public School Board for 15 years (Parent Council and current Board Audit committee member) and a regular participant and organizer for community clean up events. I value the community in which we live and work hard to make it a safe, vibrant space.

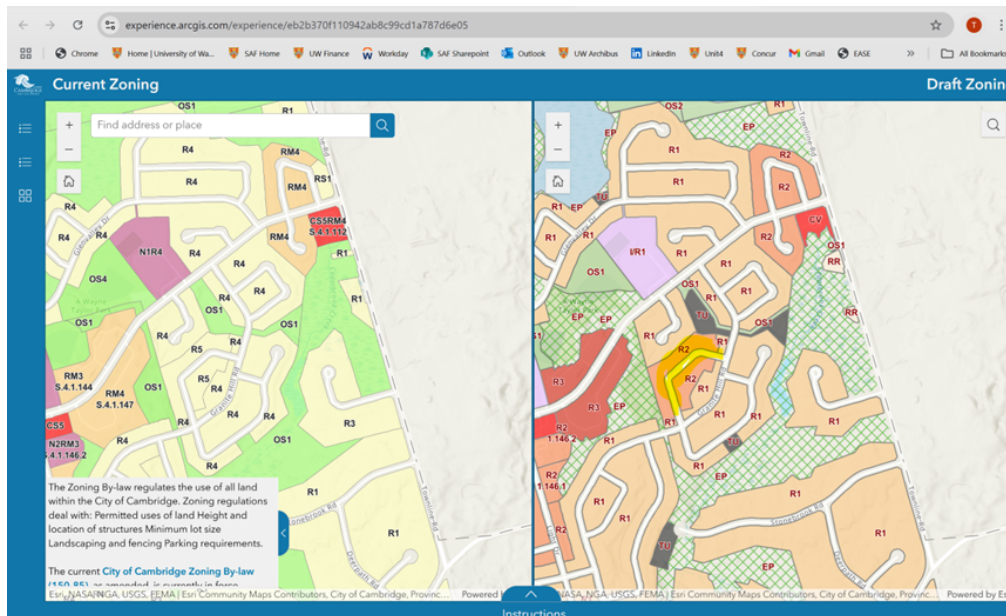
I am emailing with a question about the R2 zoning classification assigned to [REDACTED] under the proposed Zoning By-law

I am also emailing to express my deep concerns regarding the new draft zoning By-laws the City of Cambridge has put forth.

[REDACTED] [REDACTED]
Under the proposed Zoning By-law, [REDACTED] has been zoned R2, while all surrounding streets have been zoned R1.

Please provide the rationale for why [REDACTED] was zoned R2 instead of R1. There are many homes with frontage of 15m or greater on this Crescent, so it is not clear to me why [REDACTED] was zoned R2.

Furthermore, why is [REDACTED] zoned differently in the new draft zoning compared to all nearby streets, when under the existing zoning, [REDACTED] was zoned the same as neighbouring streets.



B) Concerns:

Under the new proposed zoning bylaws, every residential neighbourhood in the City will be opened up to allow multiple housing units, and at a minimum, allow rental units up to 3 storeys high.

For the last year, we have been living beside a single family home at [REDACTED] that has been converted into a rooming house in which at least 7 single young males have been living.

During this past year, we have experienced the following issues:

- multiple open fires in the back yard, lit near overhanging trees

- multiple instances of fireworks being let off in the back yard, very close to overhanging trees; and in the front yard, where live sparks landed on 2 of our cars, and one live spark missed landing on my 14 year old son's head by 6 inches
- multiple instances of loud parties spilling out into the front and back yard with noise lasting well past midnight
- regular issues with parking -- 6 to 8 cars are parked in front of this house regularly - in the driveway and on the street. Often multiple cars are parked on both sides of the street overnight.
- regular issues with cars driving at rapid speeds down the crescent to the point where it is not safe for children to play on the street - with all the cars parked on the road and the fast cars driving down the street.
- Several of these issues were submitted to the By-law department at the City of Cambridge last fall, but I do not know what steps were taken to address these issues, which still persist.

Furthermore, approx 2 years ago, a young man who lived at [REDACTED] was arrested by police and convicted for dealing drugs in our neighbourhood. It should be noted that [REDACTED] is also occupied by rental tenants. I observed with my own eyes drug deals taking place across the street from my house.

Up until recent years, [REDACTED] was a wonderful family neighbourhood, where children and families could spend time in their front yards and on the street playing safely.

Since rental tenants moved onto our street, the ability for families, particularly families with young children, to safely enjoy their homes and property has decreased significantly. Allowing existing homes to be converted into 3 and 4 storey rental units will only exacerbate these issues.

In conclusion:

- 1) Specifically, for [REDACTED], I request that the proposed zoning be changed to R1 instead of R2.
- 2) In general, I do not support a blanket application of 'Form-Based' zoning across all neighbourhoods in the City, given the negative impact it will have on existing family neighbourhoods - as I described in detail above.

Please feel free to contact me directly if you would like further information.

Thank you in advance for listening to my concerns and fielding my request.

Best regards,
Tracy Williams

Breanna Syne

From: paulrobertson [REDACTED]
Sent: Friday, March 28, 2025 11:39 AM
To: Bryan Cooper
Subject: Development relying on the federal housing accelerator fund

This Message Is From an External Sender

This message came from outside your organization.

The federal liberals have been pushing their so called accelerator fund, and yet housing in Canada is crashing.

Liberals have destroyed Canada over the past 9 years, they shutdown parliament after dumping their financial budget on the table and then walking out.

The liberal government then porouged parliament leaving Canadians with no functional government as we entered a trade war with the USA.

As parliament was about to resume, the liberal government decided it was time to call an election to avoid the crash and burn of the liberal party if parliament were to reopen.

And here we are now at the start of an election campaign, and the city is promoting the liberal party, talking about all the money the liberals will give Cambridge, if they should get a fourth term.

Why is the city doing so much to promote the liberal government, the party that has destroyed Canada.

Has the city registered as a third party agent for the liberal party?

Even if the city isn't pushing to see the liberals reelected, the timing of this announcement raises concerns.

Like all liberal plots, nothing happens until such time when they are forced to act to retain power. If you need an example, justin said he would legalize por, several years later, an election is coming, he started the process for legalization, but we had to reelect him so he could finish.

The accelerator fund is nothing more than the carrot hanging on the stick to force you to follow the liberal plot.

Paul Robertson
[REDACTED]

Breanna Syne

From: Dyer Sherri [REDACTED]
Sent: Tuesday, May 27, 2025 11:34 AM
To: Bryan Cooper; Breanna Syne
Cc: Mike Devine
Subject: ReZoning residential areas - feedback beyond the survey

Follow Up Flag: Follow up
Flag Status: Flagged

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Bryan, Breanna and Mike,

Thanks for the opportunity to complete a survey on how the city can allow more housing. Knowing the City has no more undeveloped land to work with, I can appreciate that the City has to be creative to meet the Province's demand for more housing.

Rather than finding ways to cram more people into already relatively tiny residential areas:

1 - please prioritize developments that intensify areas near Major roads and retail/offices - see pic attached.

For instance, why did a LOW RISE complex go in beside the 401, along Pinebush?

- this is PRIME area for rentals/condo's that can accommodate those starting out - either young adults, as well as those new to the area.
- instead of LOUD backyards for hundreds of people, we could have had accommodations for thousands, with retail, offices, recreation, etc on the property

I believe the Walmart area is slated for this kind of intensification - this whole stretch could have been done this way.

No issues with shadowing, or property values, and accommodates LOTS of people, hopefully at decent rents/ownership cost.

(and PLEASE require it to be attractive)

2 - ADU's on/in existing residential properties should be owned by the current land-owner. Properties should not be subdivided; this cheapens the overall value of all homes in the area.

3 - These ADU's should be for extended family only, or have landlord-friendly laws (ie easier to evict for non-payment, for damage to property, etc).

Rentals without those changes will bring overall property values down. Quickly.

AND:

4 - as counter-intuitive as it sounds, please also **seek & approve developments of attractive smaller homes, on smaller lots**, such as the Federal government is proposing

- think war-time housing type - perfect for 2-3 people, with a wee bit of land to enjoy & upkeep
- perfect for those starting out or ending up
- seniors boomers that want to downsize are not moving since there is so little available in this type. More of their larger homes will become open once boomers move out of their current homes

5 - require developers to design a **walkable neighbourhood**:

- bikeways/walkways throughout
- small recreation areas throughout
- pedestrian/bike cut-throughs between streets
- daily-need retail (small grocery, bakery, bank, health care, restaurant, etc) within the residential area - reduces vehicle dependence/use

6 - please require developers to make **NICE-LOOKING buildings**. With my job that entails driving to towns & cities all across the province, I can attest that many have such nice looking neighbourhoods and city-scapes.

—> and please demand your counterparts at the REGION to replant the **trees along Franklin Blvd** (not in December again, without any follow-up care in the spring). What's left on Franklin is a disgrace & embarrassment for us all.



Sherri Dyer

Breanna Syne

From: Randhir Singh [REDACTED]
Sent: Friday, May 23, 2025 11:40 AM
To: Bryan Cooper; Breanna Syne
Subject: Reviewing Zoning By-law for [REDACTED]

Follow Up Flag: Follow up
Flag Status: Completed

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Hi

I just came to know that The City is reviewing its Zoning By-law to update regulations and is proposing to introduce Form Based Zoning in residential areas. Which will help the City simplify its overall zoning regulations.

I am owner of property "[REDACTED]"

Legal Description: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I Would like to change Zoning to

- R2 - Detached, attached and multiple (4 storey maximum)
- R3 - Attached and multiples (5-15 storey maximum, subject to tall building standards)

Please let me know how I can proceed with the application.

Thanks & Regards

Randhir Singh
[REDACTED]

From: Jim Johnston [REDACTED]
Sent: Tuesday, October 28, 2025 10:06 AM
To: Sarah Austin <AustinS@cambridge.ca>
Subject: Fw: City of Cambridge - Council Meeting for Comprehensive Zoning By-law - Form Based Zoning Update

Sarah Austin

The following email has been sent as a strong objection to changing the M3 zoning at [REDACTED] Cambridge and requesting the next step, if any to stop this from happening

What do I need to do to make sure the zoning is not changed

Jim Johnston

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Jim Johnston [REDACTED]
Sent: Tuesday, October 28, 2025 9:54 AM
To: Breanna Syne <syneb@cambridge.ca>; CooperB@cambridge.ca <CooperB@cambridge.ca>
Subject: Re: City of Cambridge - Council Meeting for Comprehensive Zoning By-law - Form Based Zoning Update

Breanna

I have had a challenge opening the PDF my outlook account / software updated to the "new" outlook and the challenges just keep coming

I got the PDF open now , and my request is I do not want the zoning at [REDACTED] changed

What is my next step ?

Do I need to hire a lawyer ?

Jim Johnston

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Breanna Syne <syneb@cambridge.ca>

Sent: October 17, 2025 2:42 PM

Cc: Bryan Cooper <CooperB@cambridge.ca>

Subject: City of Cambridge - Council Meeting for Comprehensive Zoning By-law - Form Based Zoning Update

Good afternoon,

Please find attached a Notification Letter for the Comprehensive Zoning By-law – Form Based Zoning Update Report.

A Council meeting is being held **October 28 at 6:30pm**. This report is for information, and no recommendations or decisions are being made on the Zoning By-law at this time.

You are receiving this notification as you have previously indicated that you wish to be informed of this item. Please contact the undersigned if you wish to be removed from the mailing list.

Kind Regards,

Breanna Syne

Planner

Planning and Growth - Planning Services

P: (519) 513-6461

www.cambridge.ca



City of Cambridge • City Hall • 50 Dickson St • Cambridge • ON • N1R 1S8 • PO Box 669

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Breanna Syne

From: [REDACTED]
Sent: Friday, September 19, 2025 11:50 AM
To: Bryan Cooper
Cc: Breanna Syne; Karin Stieg-Drobig
Subject: [REDACTED]

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Bryan

I have not heard anything in regards to a possible zoning change at [REDACTED]

So for the record I am completely against it

Please keep me updated if anything is in the plans to change

Jim Johston

[REDACTED]
[REDACTED]

Breanna Syne

From: [REDACTED]
Sent: Friday, May 23, 2025 10:38 AM
To: Bryan Cooper
Cc: Breanna Syne
Subject: FW: planning notice reply

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Bryan

Great to chat with you about maintaining the M3 zoning at [REDACTED].
I appreciate your follow up and offer to get back to me about this zoning being used for unique school / training facility

I look forward to your reply

Jim Johnston

From: [REDACTED] >
Sent: May 23, 2025 9:26 AM
To: 'Breanna Syne' <syneb@cambridge.ca>
Cc: 'Bryan Cooper' <CooperB@cambridge.ca>
Subject: RE: planning notice reply

Breanna

How do I stop the proposed zone change on this building
I am NOT in favour of the process the city is proposing
I bought the building partially due to the M3 Zoning!
The building also faces onto Shade St and across the road is a used car lot, automotive repair shop and the Galt Arena gardens
Should we apply for an address change to [REDACTED]

Respectfully

Jim Johnston

From: Breanna Syne <syneb@cambridge.ca>
Sent: May 22, 2025 3:12 PM
To: [REDACTED]
Cc: Bryan Cooper <CooperB@cambridge.ca>
Subject: RE: planning notice

Hi Jim,

The new zoning by-law is a City-wide project which applies to all properties, including yours.

Your property at [REDACTED] is being zoned to R2 Residential from M3 Industrial. The reasoning for this is to ensure consistency with the City's Official Plan designation, which is Low/Medium Density Residential.

You can review the proposed changes in the draft by-law here: <https://www.cambridge.ca/en/learn-about/resources/Zoning-By-law-Review/Cambridge-ZBL-APRIL-2025B.pdf>

Please let us know if you have any questions and would like to discuss these changes further.

Thanks,

Breanna Syne
Planner
Community Development - Planning Services
P: (519) 513-6461

From: [REDACTED]
Sent: Thursday, May 22, 2025 2:22 PM
To: Breanna Syne <syneb@cambridge.ca>
Cc: Bryan Cooper <CooperB@cambridge.ca>
Subject: RE: planning notice

This Message Is From an Untrusted Sender
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So it has nothing to do with my building at [REDACTED] ?

From: Breanna Syne <syneb@cambridge.ca>
Sent: May 22, 2025 12:17 PM
To: [REDACTED]
Cc: Bryan Cooper <CooperB@cambridge.ca>
Subject: RE: planning notice

Hi Jim,

Thanks for reaching out!

Yes, it was a mass mailing about the new Zoning By-law, which is a City-wide project. If you have any further questions, please feel free to connect.

Thanks,

Breanna Syne
Planner
Community Development - Planning Services
P: (519) 513-6461
www.cambridge.ca



City of Cambridge • City Hall • 50 Dickson St • Cambridge • ON • N1R 1S8 • PO Box 669

From: [REDACTED]

Sent: Thursday, May 22, 2025 11:38 AM

To: Bryan Cooper <CooperB@cambridge.ca>

Subject: planning notice

Bryan

I have received your notice, my building is at [REDACTED] and zoned M3.

The buildings around me are residential. I believe this notice is just a mass mailing and nothing to do with me

Is that correct ?

Jim Johnston

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Breanna Syne

From: brian murphy <[REDACTED]>
Sent: Monday, September 8, 2025 5:23 AM
To: Sarah Austin; Kathy Padgett; Helen Shwery; Jan Liggett; Bryan Cooper
Subject: Official plan amendment # 67 August 6, 2024 - Signed by mayor Jan Liggett. — No buffer on east side of man created non wetland agricultural ditch.

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Subject: Official plan amendment # 67 August 6, 2024 - Signed by mayor Jan Liggett. — No buffer on east side of man created non wetland agricultural ditch.

Hello Sarah and Kathy. Below is a copy of the Greenlands and Open Space Network map as adopted and signed into effect by Mayor Liggett on August 6, 2024 as report/studies conducted and approved from WSP for the secondary plan - north Cambridge and the planning department also approved -and acknowledged by Kathy Padgett (2022).

Sarah, you stated in your last e-mail that you could not change the land zoning as there was open space associated with the removal of the fictitious 'squiggle" stream erroneously placed on the corner property to the east of our non-wetland, agricultural ditch.

Sarah and Kathy, please advise when the land zoning was last updated to reflect open space on our field - east of the agricultural ditch and who approved it? Please send me a link and/or abstract of this land zoning (showing open space) update since the WSP/Cambridge update of August 6/2024.

We could not find any recent documentation or open house notification regarding another land zone / natural heritage open space change.

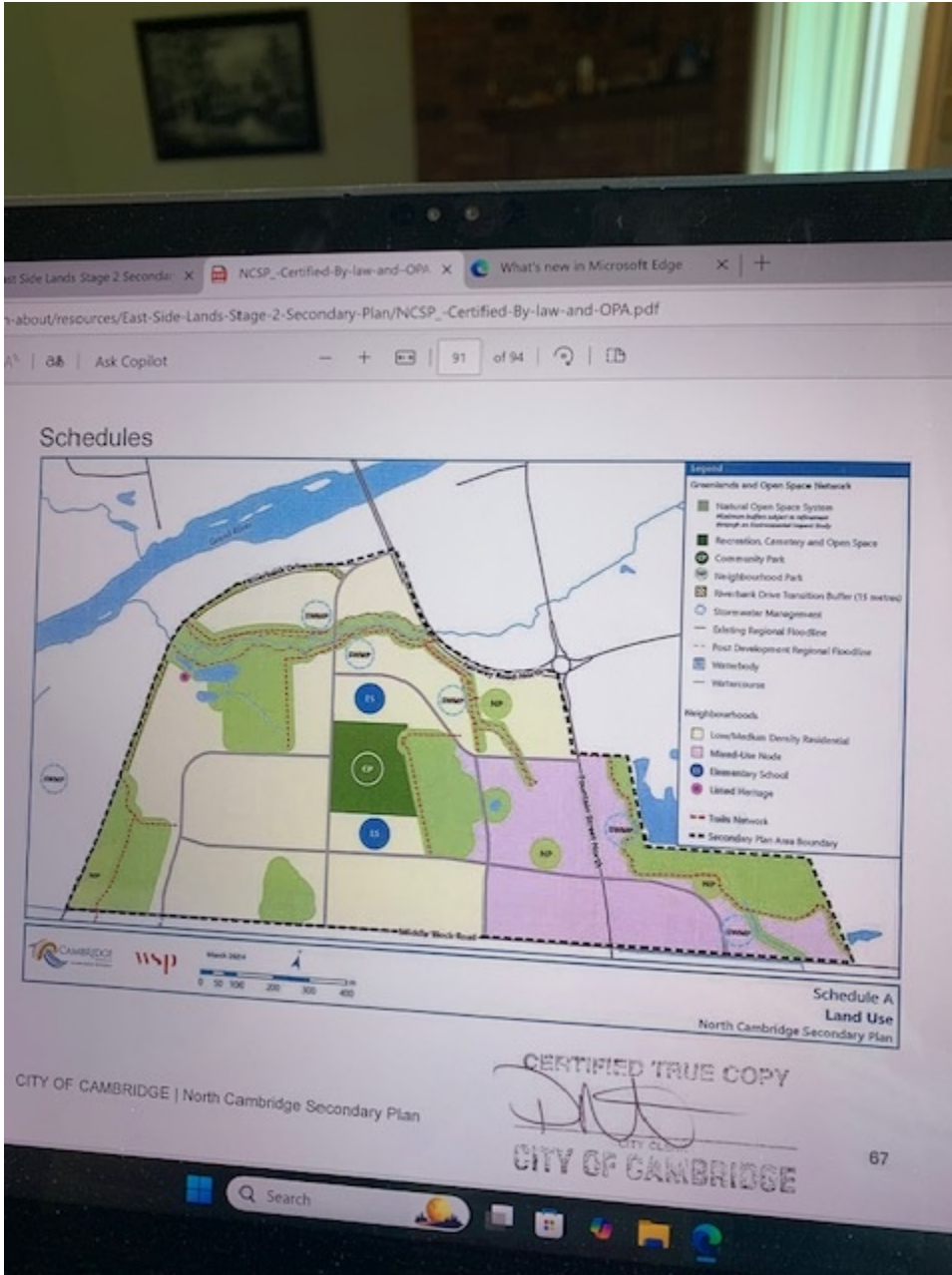
Please review this information and let us know why our field - east of the agricultural ditch should have the fictitious "squiggle" stream removed yet have open space placed upon it when updated studies/reports from WSP and signed into officiality by the Mayor and planning department - Kathy Padgett- why put open space when none exists?

Thank you for reviewing. We look forward to seeing the link and/ or the abstract complete with authentication.

Bye for now.

Cathy Murphy/Hammers

Subject: Official plan amendment # 67 August 6, 2024 - Signed into effect by Mayor Jan Liggett. — No buffer on east side of man created non-wetland, agricultural ditch.



Sent from my iPhone

From: brian murphy [REDACTED]

Sent: Tuesday, September 02, 2025 7:36 PM

To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: RE: [REDACTED] -- One question about the removal of Red and Blue Items

Hello Sarah, thank you for your reply. This information needs to be documented for future referrals. We do appreciate you removing the fictitious streams imposed on our N/E corner property and the removal of the fictitious stream in the bush. The bush did not have any buffering because it is an open space itself. The 'squiggle' stream that was imposed on the N/E corner property is on high elevated property. The backwater elevation as applied to our property by the municipality is 309.70m. Our land is of higher elevation. This in itself poses a question as to why you would remove the fictitious stream but leave open space and relate this open space to streams, and stream buffering and such as flood plains and watercourses?

Just a question but the lands opposite Fountain St N - there exists a real municipal drain - Randall Drain and it was allowed to be filled in and over and your secondary plan does not show any buffering on the land or open space?

This information was sent to Kathy Padgett in the past when we questioned the correctness of this zoning and fairness for area landowners.

Thank you.

Cathy Murphy / Hammers

From: Sarah Austin <AustinS@cambridge.ca>

Sent: Tuesday, September 02, 2025 5:01 PM

To: brian murphy [REDACTED]; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: RE: [REDACTED] -- One question about the removal of Red and Blue Items

Good afternoon Cathy,

The yellow area on the current planning map are lands zoned Open Space. The lands are not necessarily a buffer, but can be associated with natural features, including watercourses and floodplains. While we are agreeable to removing the “squiggles” that are not actually streams, the zoning of the lands is not being changed. As previously noted, changes to the zoning can be considered through a future development application with the appropriate studies to support land use changes.

Thanks,

Sarah

Sarah Austin P. Eng.

Acting Director of Planning

Planning and Growth - Admin. Planning and Growth

P: (519) 513-6409

From: brian murphy [REDACTED]

Sent: Friday, August 29, 2025 2:26 PM

To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: Re: [REDACTED] -- One question about the removal of Red and Blue Items

Good day to you all. One question came up upon reading the good news.

There is no buffers surrounding the fake stream in the bush but the Blue squiggle stream on eastern portion of our field has a very wide yellow buffering imposed on the fake stream. As the stream is not real and there is elevated land between our eastern field and the landowners to the east of our property please ensure there is no buffering remaining on our field associated with fake squiggle stream.

There should be no water running uphill from our eastern neighbours. This property holds the 3rd culvert I explained to you which is the true headwaters

of the Hunsperger Drain. The 3rd culvert extends from the pond behind their house across their land in a southerly direction (to the 3rd culvert) that extends

under [REDACTED] and drains on south side of [REDACTED] and empties into the Hunsperger Drain continuing in a southern direction. When the appropriate

time comes we will be happy to show you the professional studies and reports to illustrate the drainage flows.

Thank you

Cathy Murphy and Hammers

From: brian murphy [REDACTED]

Sent: August 28, 2025 10:18 AM

To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: RE: [REDACTED] Good Morning. Just a Friendly Followup.

Good morning. Sarah, thank you very much. Yes, this is the outcome we were looking

for. Have yourself a good day and yes, we look forward to working with you in the future.

Bye for now,

Cathy Murphy and Hammers

From: Sarah Austin <AustinS@cambridge.ca>

Sent: August 28, 2025 9:48 AM

To: brian murphy [REDACTED] Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: RE: [REDACTED] -- Good Morning. Just a Friendly Followup.

Good morning Cathy,

Staff have reviewed further, and the 2 streams shown in the red and blue circles will be removed from future City mapping.

I trust this is the outcome you were looking for and we look forward to continuing to work with you at the appropriate time on future development applications.

Thanks,

Sarah

Sarah Austin P. Eng.
Acting Director of Planning
Planning and Growth - Admin. Planning and Growth

P: (519) 513-6409

From: brian murphy [REDACTED]
Sent: Wednesday, August 27, 2025 10:33 PM
To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>
Subject: [REDACTED] -- Good Morning. Just a Friendly Followup.

Good morning Sarah and Helen, Mayor Liggett, Bryan Cooper and Kathy Padgett.

We are just wondering if you have been able to come to a conclusion about your fictitious streams imposed on your / Meridian map labelled "current zoning" ?

We would be happy to meet with you to show you our professional reports and studies that dispel the fictitious streams. We recognize that there is much

interest in this secondary plan and people are interested in the progression towards completion.

Please let us know your thoughts and solutions towards the updating of the erroneous map that Meridian is using and finalizing a solution to rectifying the problems.

Sarah, you mentioned that the fictitious streams - outlined in Red and Blue were witnessed by the GRCA in a 2012 map and we require a copy of this map - the one you are using as your proof.

Thank you for your time.

Bye for now.

Cathy Murphy / Hammers

From: Sarah Austin <AustinS@cambridge.ca>

Sent: August 21, 2025 4:24 PM

To: brian murphy [REDACTED]; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: [REDACTED]

Hi Cathy,

Thank you for confirming it was the red/blue features you wanted removed. As I noted, our 2012 zoning bylaw shows them but they were not on the digital versions of our mapping, which is what was causing us confusion in our review.

With that confirmation from you, we'll review further and I'll follow-up next week.

Thanks

Sarah

Sarah Austin P. Eng.

Acting Director of Planning

Planning and Growth - Admin. Planning and Growth

P: (519) 513-6409

From: brian murphy [REDACTED]

Sent: Thursday, August 21, 2025 3:43 PM

To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett

<PadgettK@cambridge.ca>

Subject: Re: [REDACTED]

Hello Sarah,

Thank you for your reply. First, there are not 2 additional watercourses/streams on our property. The long agricultural ditch was not asked to be removed - the stream imposed on our N/E corner property - the newest version by your project manager from Meridian Group showing a squiggly stream that starts to the east of our property on other landowners property and ends at [REDACTED] they/ someone drew in a line along side of road- looks to be actually on the road and a slotted line going west to culvert?? This is just so wrong and analyzing it will show you the errors of Meridian's ways.

First, the map stating [REDACTED] shows the agricultural ditch going into the bush. This shows the ditch drawn in far too long--this agricultural ditch starts on our field.

This man-created ditch only serves to remove over-land water from our field only and does not affect any other lands—only ours. The culvert associated with this

agricultural ditch is the 2nd of 3 culverts from Fountain St N going easterly along [REDACTED] [REDACTED] You will see in professional reports the "true headwaters" is the 3rd culvert-- on the property to the east of our N/E property.

Sarah, on the map stating "current zoning" shows a RED circle and not sure who put the blue line on paper - but NO stream exists there and you have the RED circle in the BUSH??

You will also acknowledge your RED circle stands alone and does not connect with the agricultural ditch or anything else. Not sure how or why this short blue line in bush -you feel could be a stream when it has no starting point or ending point?? Your RED circle of a stream is yet another new twist to our property.

Please update your records to show NO stream in the RED circle.

Sarah, again viewing your first map- [REDACTED] - you will agree there is NO stream from culvert to east of our property. Your project manager has created another example of a stream - "a squiggle stream" that does not exist.

Please refer to your MTE elevations map as used by and through the GRCA — Gus Rungis - The in-house meeting at GRCA dated July 27, 2015 - please refer to the elevations map and updated "coloured" flood lines as prepared for us by the GRCA- and they printed the map. You will see our lands sit higher in elevation compared to the Regional Flood line (309.70 with the backwater conditions applied) using current 2 yr sized culvert.

Please note that you have the fictitious stream starting at the pond to east of our property and going west uphill over towards our property - across the narrow tree line and continuing westerly over our property (elevations higher than Regional flood line and then abruptly turning south in a new squiggle design and does not touch a culvert but runs into side of [REDACTED] Someone put in slotted lines on road side continuing in a westerly direction and ends at top of road where culvert exists under [REDACTED]

Now, you know this is not factual as no reports exist of water over road and no water discharge on side of road or the non-existent ditch that is along the northern part [REDACTED]
[REDACTED]

Sarah, our request is to update the mapping for the Secondary Plan to remove two streams in Red and Blue circles you have identified today. These are not true depictions of streams and need to be corrected and removed. Your [REDACTED] map does not show any streams - just our agricultural ditch.

Please have the map for our property updated and please have Meridian Group be more diligent when dictating structures and units on private property.

I would be happy to show you our professional documents and reports and studies as it

pertains to our property.

We have professionals waiting for the redesign of [REDACTED]. One thing i need to point out is that when the redesigning of [REDACTED] is being undertaken there should be no negative designs placed on our property - such as elevating [REDACTED] to create yet a higher back water condition. There should be no adverse effects placed on our property when the road is reconfigured. Also, as the government owns the lands south of [REDACTED] - use all of those lands so we do not have to lose any of ours for the road expansion. This will save Cambridge residents money so not to buy our lands.

Thank you.

Cathy Murphy and Hammers

From: Sarah Austin <AustinS@cambridge.ca>

Sent: Thursday, August 21, 2025 1:29 PM

To: brian murphy [REDACTED]; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>

Subject: RE: [REDACTED]

Good morning Cathy,

City staff have been consulting our GIS mapping, which is a comprehensive set of data layers that include natural features, zoning and GRCA areas. On that mapping, the only

watercourse shown is the upper reach of Middle Creek (see attached photo labeled [REDACTED]). That is the stream we understood you were looking to have removed from our mapping. However, upon further readings of your email and review of the printed version of the 2012 Zoning Bylaw, we do see 2 additional watercourses shown on your property. Those are shown on the attached photo labelled Current Zoning Map. Can you please confirm that it's the streams circled in red and/or blue that you are discussing below and want removed?

Thanks,

Sarah

Sarah Austin P. Eng.
Acting Director of Planning
Planning and Growth - Admin. Planning and Growth
P: (519) 513-6409

From: brian murphy [REDACTED]
Sent: Tuesday, August 19, 2025 8:32 PM
To: Sarah Austin <AustinS@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>
Subject: Re: [REDACTED]

Thank you Sarah for your reply. We do not understand how the mapping cannot be amended to reflect the fact that there is no stream on our eastern portion of land. Your commissioner of planning - Wendy Wright identified the error from the HWSS and advised the necessary people to update the mapping to have the erroneous stream removed from mapping. This was done and many of the GRCA and municipal maps did not show any stream. It was a hit and miss at best - depending on what map was being viewed at the time - this reflected our property with either showing the fictitious stream or not.

Now, with your hiring Meridian Group - they obviously viewed a map that had the hand drawn stream put on the map. If you have not compared mapping please do so as your hired engineer has this fictitious stream as a squiggle and does not go to the culvert but heads south to touch [REDACTED] This is a new version compared to what we have observed from before. So, you can see the fictitious stream is not even remotely being identified the same.

Please advise how someone can identify a fictitious stream on an area of land that should not have one - yet be held responsible for proving it does not exist??

Where does the responsibility lay when trying to create an honest report? How can someone just take the word of another and falsify information and you pay them to do this??

Please advise again why you cannot fix the problems and false information you are plotting on our property and yet again expect the landowner to correct all the wrongs....very much like the HWSS when you fired the project manager - [REDACTED]

If you view the elevations on our eastern portion of land and the neighbours to the east you will see your project manager from Meridian Group also has water running up hill.

Thank you

Cathy Murphy and Hammers

From: Sarah Austin <AustinS@cambridge.ca>

Sent: Tuesday, August 19, 2025 4:35 PM

To: brian murphy [REDACTED]; Kathy Padgett <PadgettK@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>

Subject: [REDACTED]

Hi Cathy,

Unfortunately, at this time, we are not able to remove the watercourse/natural heritage feature from your property. We appreciate all the background information you have provided and the additional information you have available. However, as Kathy has noted, a watercourse regulated by GRCA has been identified on your property and can't just simply be removed.

With regards to the floodplain, I do recall the work with GRCA to update the floodplain to align with the existing elevations on your property, which resulted in a reduction of the floodplain. The city has not yet undertaken the design of the upgrades for [REDACTED] and won't for at least a couple of years. When that work is undertaken, the information regarding the culvert will be shared with you.

As described by Kathy below, current site-specific studies will be required to make any further refinements to the floodplain or watercourse/natural heritage features. These studies are typically completed in support of a development application, but you could retain an ecologist to do a scoped study ahead of a formal application, but a complete Environmental Impact Study would still be needed as part of an application.

I'm assuming that you are likely working to maximize the developable area on your property. I'm also assuming that you are not likely to develop the lands yourself and so are looking to position them as best as possible for a future sale. While I understand that approach, I would note that the completion of these types of studies to refine/confirm features is very typical, and developers would be expecting to have to do this work to support their vision for the lands.

Staff look forward to continuing to work with you at the appropriate time to facilitate development of your lands.

Regards,

Sarah

Sarah Austin P. Eng.
Acting Director of Planning
Planning and Growth - Admin. Planning and Growth
P: (519) 513-6409
www.cambridge.ca



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From: brian murphy [REDACTED]
Sent: Tuesday, August 12, 2025 5:59 PM
To: Kathy Padgett <PadgettK@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>; Bryan Cooper <CooperB@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>; Sarah Austin <AustinS@cambridge.ca>
Subject: Re: Good morning. I am sending this e-mail as a gentle reminder that we sent the e-mail below on May 6th in response to the presentation regarding the New CZBL and OPA.

Thank you Kathy for your reply and Helen for your continued interest in this issue.

Kathy, I am not sure from your reply if you are able to remove the W-E fictitious stream that was placed on our N/E corner property? This fictitious stream was to be removed from your mapping in 2003. I know I brought it to the planning department many

times that the mapping was never updated and nothing ever changed.

Kathy, I have the letter from [REDACTED], Commissioner of Planning, dated March 6, 2003 addressed to my parents-[REDACTED] that the stream was an error and thanked us for 'pointing out this error'. It was to be removed from your mapping after the HWSS had final approval of the watershed study and the commencement of the Community Plan. This was scheduled to go before the General Committee of Council on Monday April 28, 2003 at 7 pm. I guess they did not finish the task as the fictitious stream is still

popping up on our property again. I have this letter for your records to support this action to take place.

Also, Kathy, I have information from [REDACTED] advising that the site specific study was to be conducted on our corner property and this request is what prompted the GRCA to conduct one and [REDACTED] recalculated the flood lines imposed on our property due to the imposing "municipal backwater conditions". [REDACTED] using our elevations map from MTE and [REDACTED] calculated any updates to the flood lines and showed these changes in colours. This was all approved by and through the GRCA. The inhouse meeting was held on July 27, 2015 with full participation of the GRCA staff and Cambridge planners as well. We have the large wall map used by the GRCA - Gus Rungis to illustrate the changes to the flood lines as it existed then in 2015 using existing culverts, etc.

Kathy, if further proof that the fictitious stream should never have been placed on our property (by your hired Meridian Group) please refer to the HWSS- floodline mapping - MAP 1D of E. There is NO W-E stream on this HWSS map.

Please refer to the HWSS - EXISTING NATURAL HERITAGE SYSTEM map dated September 2004 - Map 02 (2004). This coloured map shows the depicted natural heritage features and does not have any W-E stream on it. This map was part of the HWSS book for publication.

Please also refer to the 1995 Aerial Photography map from the Delcan study conducted for Cambridge in year of 2000- 2001 for the construction of the Loblaws Warehouse.

These professional engineers conducted a wide study of the area and their mapping is great. The mapping these engineers pointed out for our corner property shows all existing conditions - including the 'real headwaters of the Hunsperger Drain' and shows there is no fictitious stream on the property.

Also, if still not sure - please refer to the DATA SUMMARY Report from [REDACTED] [REDACTED] dated January 20, 2004 - completed for the HWSS they provided for the planning department and a copy for the [REDACTED] family both written summaries of data collected for the various units as depicted on our property. Both their written report and mapped report do not support any fictitious stream on our N/E corner property.

Kathy, I have much more to support both the final removal of the fictitious stream as it was supposed to be removed but I also have much information in support of the "municipal backwater conditions" imposed on our property and now leaving the family to dispel the invalid facts being imposed upon us.

Please, I encourage everyone to reread the letters from our lawyer [REDACTED] [REDACTED]-submitted to Cambridge planning as it pertains to our requests for corrections.

Kathy, we have an engineer awaiting the final culvert dimensions once [REDACTED] has been completed for the 4 lane road and 50 year culvert . We also have retained a experienced land planner as well as our lawyer.

We await your information.

So, in the mean time can you once and for all remove this fictitious stream that for what

ever reason your contracted Meridian Group put it on our property.

We should not have to spend any money dealing with a issue long past the time of correction and for what reason keeps popping up on maps - yet the truth / facts are being overlooked.

Thank you Kathy and Helen.

Bye for now.

Cathy Murphy and Hammers.

#####

From: Kathy Padgett <PadgettK@cambridge.ca>
Sent: Tuesday, August 12, 2025 11:18 AM
To: Helen Shwery <shweryh@cambridge.ca>; 'brian murphy' [REDACTED];
Bryan Cooper <CooperB@cambridge.ca>
Cc: Jan Liggett <liggettj@cambridge.ca>; Sarah Austin <AustinS@cambridge.ca>
Subject: RE: Good morning. I am sending this e-mail as a gentle reminder that we sent the e-mail below on May 6th in response to the presentation regarding the New CZBL and OPA.

Good morning Cathy and Councillor Shwery,

As we discussed through the North Cambridge Secondary Plan process, I can provide a summary of the next steps to address the items in Cathy's email.

With respect to the floodplain, when the City completes the design for [REDACTED]

including upsizing the culvert, the landowner can retain a consultant to review the floodplain on their property through studies required by the GRCA (hydrological and hydraulic modeling). This would typically be done through the development application process, but could be done in advance of a development application should the landowner choose to do so.

A watercourse regulated by the GRCA is identified as being present on the property. Typically, natural heritage features on a property are reviewed through an Environmental Impact Study (EIS) submitted with a development application, and natural heritage features are reviewed and assessed through that process. In our discussions on the North Cambridge Secondary Plan, City and GRCA staff advised that the landowner could complete some scoped environmental work prior to a future development application should they choose to do so. The landowner would retain an ecologist and City/GRCA staff would work with them to define the scope of work to review and assess the natural heritage features on the property. A full EIS would still be required at the time of a development application.

For both items, recent site-specific studies are required to make any refinements to the floodplain or natural heritage features on property. The outcomes of these studies would then inform any updates to the zoning on the property. A zoning by-law amendment will be required as part of a future development application for this property, and the zoning would be updated at that time to reflect any changes identified through the floodplain and environmental studies.

I hope this information helps with respect to next steps, but please let me know if you have any questions.

Regards,

Kathy

Kathy Padgett MCIP, RPP
Senior Planner - Environment

Community Development - Planning Services

P: (519) 513-6451

www.cambridge.ca



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From: Helen Shwery <shweryh@cambridge.ca>

Sent: Monday, August 11, 2025 5:09 PM

To: 'brian murphy' [REDACTED]; Bryan Cooper <CooperB@cambridge.ca>;
Kathy Padgett <PadgettK@cambridge.ca>

Cc: Helen Shwery <shweryh@cambridge.ca>; Jan Liggett <liggettj@cambridge.ca>

Subject: RE: Good morning. I am sending this e-mail as a gentle reminder that we sent the e-mail below on May 6th in response to the presentation regarding the New CZBL and OPA.

Hi Cathy,

Thank you for the reminder. I was wondering as well.

Hi Kathy,

Can you please respond to Cathy? We made some verbal assurances at our council meeting.

Kind Regards,

Helen Shwery

Ward 1 Cambridge City Councillor

Ph: 519-513-7046

Cell: 519-841-1914

From: brian murphy [REDACTED]

Sent: Sunday, August 10, 2025 10:04 PM

To: Bryan Cooper <CooperB@cambridge.ca>; Kathy Padgett <PadgettK@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>

Subject: Good morning. I am sending this e-mail as a gentle reminder that we sent the e-mail below on May 6th in response to the presentation regarding the New CZBL and OPA.

Subject: Good morning. I am sending this e-mail as a gentle reminder that we sent the e-mail below on May 6th in response to the presentation regarding the New CZBL and OPA.

Hello and good morning. We have not received any response to the e-mail submitted below and do not want to miss the opportunity to discuss and update inaccurate

information that was published on our property - [REDACTED]

[REDACTED] Also, we acknowledge that Middle Block Rd is to be upgraded and reconstructed as stated in Cambridge's timeline for 2029.

As you already know from the numerous professional reports - there is a false flood line on our property and is called a "municipal backwater" condition. What we need to know to allow us to move forward is the sizing of the middle culvert on [REDACTED]. We already have the dimensions for the now existing 2 lane [REDACTED] but need the NEW dimensions for the proposed 4 lane road culvert. The 2 lane road culvert (25 year sizing) was completed by Conestoga Rovers and the planned 4 lane expansion is to be sized for a 50 year sized culvert. Currently there exists the grossly undersized 2 year sized culvert. So, as you can see the culvert upsizing will be quite significant.

Also, the mapping illustrates a fictitious stream that is portrayed on our property and just

does not exist. A simple drive by would show this information and back in 2003 the reply from then sr. planner [REDACTED] would acknowledge that there is no stream and was promised to be removed from their mapping. We have in our possession (as Cambridge and the GRCA should as well) documents that show multiple professional documents that back our statements and show the facts.

We would appreciate it if we can show you these professional documents (including a newer survey/elevation map from MTE- and Kathy I believe you already have a copy of it) and accepted and approved by The GRCA (Gus Rungis).

The GRCA ([REDACTED]) also calculated and documented the no-flood lines resulting from the "municipal back water" condition placed on our field due to elevating of [REDACTED] [REDACTED] We have his / GRCA coloured maps showing changes to flood lines due to changes to the "municipal back water"

At this stage if left uncorrected and the false information placed on the land - we cannot move forward. We need the false information (W-E stream) currently published on our property to be re-examined and corrected/removed as was promised by the Planning Department by [REDACTED]

[REDACTED] order for the CZBL and OPA to move forward with accurate information, (1) please set up a meeting so we can discuss the necessary revisions on our N/E corner property and (2) the dimensions established for the 50 year sized culvert for the reconstructed 4 lane Middle Block Rd and have all established for the up coming fall mandate for the final presentations.

With the new CZBL and OPA being proposed for the City of Cambridge we know the calculations and reports will be available for sizing of reconstruction and expansions of existing roads and associated culverts.

Thank you for your attention to this issue.

Cathy Murphy and Hammer family.

From: brian murphy <[REDACTED]>

Sent: Tuesday, May 6, 2025 9:15 PM

To: Bryan Cooper <CooperB@cambridge.ca>

Cc: Kathy Padgett <PadgettK@cambridge.ca>; Helen Shwery <shweryh@cambridge.ca>

Subject: May 6, 2025 - council meeting for the new CZBL and OPA - Request for opportunity to discuss mapping and it's on our property.

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Good evening to Bryan Cooper and Kathy Padgett and Helen Shwery.

A very good presentation and good discussions resulting from the information presented at the May 6 2025 council meeting.

First, as stipulated by Councillor Ermeta please put my name on the list to be notified by the planning department of any future

information and updates to today's meeting regarding the New CZBL and OPA .

Cathy Murphy [REDACTED] -- [REDACTED] .

I understand that the information was submitted by "Meridian". Our concern is in regards to the mapping produced for this

New CZBL and OPA. There is information missing from the report that would shed a lot of light on our property once it has

been completed. We own property on the N/E corner of [REDACTED]

It has been rezoned from existing

agricultural to a mixed-use zoning . Having said that, we also know that [REDACTED] will be upgraded in the next 2-3 years

using Cambridge's own timeline for development and road upgrades. Engineering has dimensions of a 25 year (Conestoga Rovers)

calculation-- that [REDACTED] will be upgraded from the existing 2 lane road to a 4 lane road. There is a grossly undersized culvert

currently under [REDACTED] that touches our agricultural ditch and the culvert is a 2 year size.

Cambridge Engineering Dept a number of years ago calculated the appropriate

25 year sized culvert using Conestoga Rovers for replacement of the 2 year culvert. What we need as time is getting closer to

[REDACTED] upgrade is to know the 50 year sized culvert for the 4 lane road. We already know the implications of the floodline

on our N/E field from the 25 year sized culvert -- what we need now is the next step and what are the dimensions of the 50 year sized culvert.

We have on the new mapping produced by Meridian some fictitious land elements such as a stream crossing over our field

complete with a buffer that does not exist?? We have several studies and documents accepted and approved by the GRCA and

Cambridge planning and the Region of Waterloo, and these reports, etc show the facts and existing land elevations, and conditions.

This information should be used as factual evidence for our property instead of non-credible statements.

I would respectfully request that we meet to go over the existing approved documents and update the criteria placed on our

N/E corner property. I also respectfully request that the 50 year culvert information also be available for review.

I would respectfully suggest that if the Meridian report contain information in regards to window sizing, yards and setbacks, etc in finer

details then the sizing of culvert should also be included in their delineation of flood lines.

Thank you all for your assistance and involvement in obtaining and reviewing this pertinent information.

Cathy Murphy / Hammers

From: Leslie HOLDWAY <[REDACTED]>

Sent: Monday, May 12, 2025 3:39 PM

To: Karin Stieg-Drobig <StiegDrobigK@cambridge.ca>

Cc: Bryan Cooper <CooperB@cambridge.ca>; Breanna Syne <syneb@cambridge.ca>

Subject: Re: New Comprehensive Zoning By-law Public Meeting Notice

This Message Is From an External Sender

This message came from outside your organization.

I am shocked to hear cambridge considering dragging out the reformed bylaw another year when it's ready to go and urgently overdue Cambridge's provincial assistance is unlikely to be met this year Does no one get how urgently this is needed. We have a3.5 million housing deficit and counting. This is why

Les Holdway

Sent from my iPhone

From: Danna F <[REDACTED]>
Sent: Thursday, May 22, 2025 10:44 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Question - new zoning

This Message Is From an External Sender

This message came from outside your organization.

Hi Bryan - I'm looking at the new proposed zoning information and have a few questions.

1. When I look at the interactive map, my area has no zoning details, but rather says this area is subject to by-law 150-85. I am aware that this is the area for the planned secondary plan.

Would it be fair to say that because this is a special area/MTSA, the secondary plan that is yet to be completed, will govern this area and that is why there is no information listed on the map?

2. Can you link me to by-law 150-85? I'm not sure if this provincial or city level.

3. Under the current in-force bylaw, what is the set back of new dwelling development from railways? I believe it is 15 meters but wanted to check. For example, the approved (I think?) development on Laurel Street in Preston says 15 meters is the setback.

Thank you,

Danna Ferrarese

From: Scott Snively <[REDACTED]>
Sent: Thursday, June 19, 2025 1:23 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Cc: Mike Devine <devinem@cambridge.ca>
Subject: Zoning Changes

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Hi Bryan,

I have a serious concern that the information regarding the proposed formed based zoning changes is not widely understood. Although the mailout was done, unfortunately most people in my area had no recollection of receiving it and until we informed them of what the by-law proposed, had no idea it was being considered.

This is far too important a change not to ensure home owners are aware and have a chance to feed back. We went to one of the drop ins and I was given a number of 3000 or so visits to the webpage and 250ish surveys received. Put in perspective, with about 54,000 homes in Cambridge 3000 represents 5.5% who have been to the webpage (assuming multiples aren't from the same household). The 250 surveys represent .4% of the home owners who have provided feedback. This is not a representative sample. The mailer may have made the mailboxes but it did not get read and or understood as to what it is proposing by a significant portion of homeowners.

Please do not assume mass silence is due to lack of interest, it is lack of understanding.

regards,

Scott Snively

From: Jackie Leskovar [REDACTED] >
Sent: Thursday, June 26, 2025 12:29 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Zoning Concern [REDACTED]

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Hi Bryan,

I just left you a voicemail as well. We are the owners of [REDACTED]. As per my voicemail, we are working on a current project that would require this property to remain an M3 zoning. We understand there is a draft in place to change the zoning to an M2. Please provide the necessary avenue in which we can express our concerns with this proposed change.

Kind regards,

Jackie Leskovar

[REDACTED]

From: Meg Saulnier <[REDACTED]>

Sent: Saturday, June 28, 2025 8:05 AM

To: Bryan Cooper <CooperB@cambridge.ca>

Subject: Zoning Bylaw Form Based Residential Zones Concerns

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Hi Bryan,

I have lived in Cambridge (Hespeler) all of my life, along with my sister's and now our children. My son goes to [REDACTED] in Cambridge.

I was deeply concerned to learn to learn that the city is considering or planning to allow people who own single family homes to turn them into multi unit dwellings. Our neighbourhoods, quiet streets, and although declining safety will be greatly impacted. Not to mention those who have purchased property in Cambridge before this was suggested did not sign up to live next to an apartment building. Th city already lacks in our roadways, schools are over flowing, we lack the infrastructure to handle more traffic, etc. As someone who drives a short distance to work that commute is increasing daily.

I also cannot imagine my mother in law who has spent the better part of her 15 years of retirement on her backyard garden, having a parking lot paved beside her relaxing oasis because a neighbourhood home becomes a multi unit dwellings.

The more that Cambridge makes these decisions that do not consider it's current residents. Who pay property taxes that are extremely high. There are already significantly more multi unit dwellings in the city, there is new building happening all around us. We are reaching the point where we won't want to own property if our quiet street can become a bunch of multi unit dwellings.

I fear that it is maybe time for my family, along with many others to make the difficult decision to find a new town to live in. I'm not interested in owning a home on a quiet street that an investor can demolish a home and create an apartment on.

I also think the city has not made home owners aware, you seem to be trying to quietly sneak this one by. The messaging I received was so vague I didn't understand and had to dig in to find the information myself.

Thanks,

Megan Saulnier

From: Lili Ren [REDACTED]
Sent: Tuesday, July 1, 2025 6:33 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Concerns Regarding Proposed Residential Zoning Changes!

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Dear Bryan,

I am writing to express my concerns regarding the City's proposal to permit additional types of housing in residential neighborhoods, as outlined in the Preston Centre plan.

While I understand the intention to increase housing options, I am concerned about the practical impacts on parking and road safety. The proposal suggests providing one parking spot per unit. However, in reality, multi-unit or multi-generational households may own more vehicles than that allocation can support.

On Winston Blvd, for example, there are already significant challenges with vehicles parked on both sides of the road, making it extremely narrow and hazardous to drive, even early in the morning. This situation puts drivers at risk of collisions with parked vehicles and creates unnecessary stress and danger in the community.

If additional housing units are approved without stricter parking requirements, these problems will likely become worse. I strongly recommend that the City consider requiring additional parking spots per unit, or alternatively, charging an extra monthly fee of \$500 to \$2,000 for residents who park on the street or near their yard. This measure could help manage congestion, promote responsible parking, and improve traffic flow and safety.

In addition, I encourage the City to prioritize environmental health and community well-being. Policies should protect the safety and quality of life of current residents, rather than risk harming the neighborhood through overcrowding and increased traffic. It may also be beneficial to arrange public parking options for residents who own multiple vehicles but only pay property taxes on a single property with multiple housing units.

Thank you very much for taking the time to consider these concerns before moving forward with any zoning changes.

Sincerely,

Lili Ren

From: M & G Wiens [REDACTED]
Sent: Monday, July 14, 2025 6:33 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Proposed new Zoning By-law

This Message Is From an External Sender

This message came from outside your organization.

Hi Bryan,

It was good to talk with you in person at the drop-in session on Langs Drive some weeks ago. I had hoped to complete the online survey but missed the deadline.

As you may recall, I had a lot of mixed thoughts about this proposal. In the end, I have serious concerns about it.

My first concern, as I shared with you, is the loss of residents' ability to challenge a proposed development. As it is now, neighbouring residents hear about development proposals late in the planning process, such that it is difficult to inform themselves properly in a timely manner and be heard appropriately. With this new plan, neighbouring residents will in many cases not find out until a building permit is issued. I think this is not right.

In view of that reality, I think the process has been too hidden from public view/discussion. Really, every resident might have received a notification advising them more clearly of the specific ramifications of the proposed new zoning on their property. This may not have been easy to do but would have been fair (could have gone out with tax bills over the last few years). At this stage I think a municipal referendum would be appropriate. This is a massive change that is being proposed.

A third concern I have is the specific changes that may occur with no direct input from either residents or Council if this is implemented as proposed. The specific example that

concerns me is [REDACTED] which recently was rezoned from R3 to RM3 and OS1 with site-specific exceptions for the RM3 portion. It appears from the interactive map that the entire site will be zoned R1 under the proposed new system: in other words the OS1 zone will be wiped out; this does not seem to me to be an acceptable outcome. I wonder how many other areas across the City will have unintended changes made through the blanket application of new zones if this goes forward.

Please let me know when this is going before Council so that I can delegate at that time.

Sincerely,

Martin Wiens

[REDACTED]

[REDACTED]

From: Ibrahim Tahir [REDACTED]
Sent: Sunday, July 13, 2025 8:21 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Support for zoning changes

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Hi there, I spoke to you once at City Hall about the proposed zoning changes in the City of Cambridge. I remain very supportive of them and have filled out the survey and directed others to do so. One person contacted me and sent me the following message:

"Damn I'm sad I missed the survey. We really need more mixed/form based zoning. Having spent time in cities with it, holy hell is it so much nicer to just be in, let alone the effect it has on housing and transportation costs. Thanks for sharing!!"

Now that the survey is closed I thought this would be the best way to relay this support, though I'm unsure who to direct it to specifically. I know some people are skeptical but I truly think many of the people who support the changes did not get to hear about it or make their voices heard. In my opinion, people who are against change are more likely to speak up than people who are in favour of change. I hope this email wasn't too out of turn! I'm just enthusiastic about the subject.

Best,

Ibrahim

Breanna Syne

From: Bryan Cooper
Sent: Wednesday, June 11, 2025 9:26 AM
To: Breanna Syne
Subject: FW: Air Liquide Facility [REDACTED]
Attachments: Proposed M3 Zoning on Air Liquide facility.pdf; Aerial Photo Location of Air Liquide .pdf; IncorporationbyReferenceMemo.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
P: (519) 513-6441
www.cambridge.ca



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From: Robert Lehman [REDACTED]
Sent: Wednesday, June 11, 2025 9:03 AM
To: Bryan Cooper <CooperB@cambridge.ca>
Cc: Bob Lehman [REDACTED]; Eric Lalonde [REDACTED]; John KEHOE <[REDACTED]>; Sean Hertel [REDACTED]
Subject: Air Liquide Facility [REDACTED]

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Bryan, thanks for chatting with me about the zoning process. I am the planning consultant for Air Liquide Canada, who operates a significant industrial gas and medical gas filling, warehousing, and distribution facility at [REDACTED] in Cambridge. I am sharing this role with Sean Hertel. The property currently has a site specific zoning which recognizes the specific uses and investment made on the site over the last few years. I am writing to ask that you confirm that the site specific zoning, referred to as S 4.1.279 on the current mapping, will remain. I note it is included in the draft.

I also note that the Hespeler Road corridor is shown as not part of the new by-law. The draft mapping shows it as deferred and subject to the current comprehensive zoning by-law 150-85. Could you please let me know the reasons for this area not being included in the by-law review. Perhaps there is a staff report you can point me to.

The Air Liquide facility and surrounding uses are proposed to be zoned M3 as shown on the attached map. The zone purpose is stated as:

"9.1.3 Employment Business Industrial (M3) Zone

The M3 **Zone** applies to older traditional industrial areas that are located throughout the **City** and the newer industrial area in the vicinity of Fountain Street and Maple Grove Road. These lands are designated Business Industrial by the Official Plan."

The M3 zone permits a 'child care centre' which is defined as follows: "**Child care centre:** has the same meaning as in the Child Care and Early Years Act, as amended."

I have two concerns with the inclusion of this use in the M3 zone. The current definition in the Act is: "child care centre" means a premises operated by a person licensed under this Act to operate a child care centre at the premises." Section 3 of the Act provides more clarity and provides that the **Meaning of "child care" is:**

"**3** For the purposes of this Act, child care means the provision of temporary care for or supervision of children in any circumstance other than in exempt circumstances."

According to the Provincial Planning Statement 2024 a child care centre is a sensitive use. The definition of sensitive use specifically includes day care centres. It reads:

"Sensitive land uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects from contaminant discharges generated by a nearby major facility. Sensitive land uses may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities."

A series of policies in the PPS 2024 require separation of employment uses such as those permitted in the M3 zone from any sensitive uses. These policies include 2.8.1.1 e), 2.8.2.3 d), 3.5.1, and 3.5.2. As such the proposed permission for child care centres as a permitted use in the M3 would not be consistent with the PPS 2024 and thus contrary to Section 3 of the Planning Act. The provisions of Environmental Compliance Approvals issued under the Environmental Protection Act are such that the introduction of a sensitive use in proximity to Air Liquide, and in fact, in proximity to most industrial uses, would change the terms of the approval and potentially require significant costs to meet the requirements of the Environmental Protection Act. In the case of Air Liquide a sensitive use locating in proximity to the propane storage area would also likely mean the loss of the license to operate such a facility. This license is issued under the provisions of the Propane Handling Act. I can provide you with more information and detail on this issue if you wish.

We would ask that the use of 'child care centre' be deleted as a permitted use in the M3 zone and the permission for such a use as part of a Place of Worship be precluded within the M3 zone as well.

Additionally as I mentioned on the phone the provisions in the draft by-law that automatically amend the zoning if a referenced Provincial Act is amended are not appropriate/legal. Termed incorporation by reference, the best practice is to reference the specific version of the Acts being relied upon, and amending the zoning if the Act is amended. Otherwise there is no notice to the public and the natural justice intent of the Planning Act is subverted. Attached is the legal opinion on this issue that I mentioned.

We are continuing our review of the changes to the by-law and may have additional comments.

Robert Lehman

[REDACTED]
[REDACTED]
[REDACTED]

Robert Lehman

[REDACTED]
[REDACTED]
[REDACTED]

From: Michael Danyluk <[REDACTED]>

Sent: Monday, July 28, 2025 1:02 PM

To: Bryan Cooper <CooperB@cambridge.ca>

Subject: Follow-Up on Zoning and Access – [REDACTED]

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Hi Bryan,

Thank you again for taking the time to speak with me at the public drop in meeting on June 6th and for the clear and helpful way you explained the proposed bylaw changes. I appreciate the work you and your colleagues are doing to manage such a complex task while balancing the concerns and needs of so many across the city.

As we discussed, our church has no plans to relocate or make immediate changes to our property at [REDACTED]. That said, we would sincerely appreciate any consideration that could be given to maintaining our current **Institutional and Multi-Residential zoning**, along with the existing lack of building **height restriction**. Preserving that flexibility would go a long way in protecting the long-term value and future usability of our property.

Also, if you're able to look into the matter of the **rear access point**—specifically whether we have an established right of access at the intersection of Second Avenue and Caen Street—we'd be grateful. And if it turns out that no such right currently exists, we would be very interested in exploring what steps might be taken to formalize or secure one.

Thanks again for your time and for the thoughtful approach you're bringing to this process.

Warm regards,

Michael Danyluk

Pastor, Beacon Baptist Church

[REDACTED]

[REDACTED]

From: Gavin Tweed <[REDACTED]>
Sent: Friday, August 1, 2025 2:30 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Subject: Galt rezoning

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Hi Bryan, I'm potentially looking to purchase a property within Galt, at the moment it's zoned R4 but according to the new zoning draft it'll be moved to R1, just wanted to see how accurate this draft is as of now and when these changes might take place? Just for future development of the property R1 makes sense for the investment but wouldn't be worth it with the current R4 zoning, thanks for your time!

Sent from my iPhone

From: Henry, Jeff <[REDACTED]>
Sent: Thursday, May 1, 2025 2:24 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Cc: Melissa Mohr <mohrm@cambridge.ca>
Subject: Re: Follow up from April 29, 2025 Council Meeting

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Thank you, Bryan.

I've taken note of how "old" site-specific by-laws are being carried forward if they have not been constructed. Generally it appears some effort has gone into removing site-specific regulations that would no longer be applicable (i.e. Maximum densities) and translating zone categories into the new applicable zones.

In the case of [REDACTED], and given the attached site-specific by-law adopted on Tuesday, April 29th, I'd anticipate this means under the next/final draft CZBL:

- the site would be zoned R2 with site-specifics 1.483 through 1.486, plus the OS1 zoned trail block.
- within the site-specifics,
 - Maximum densities would be removed
 - Minimum common outdoor amenity areas would be removed where they exceed the new 15 sm / unit standard
 - Minimum yards and the prohibition on projections would be removed where they exceed new standards (i.e. front/exterior yard setback of 3.3m with no projections in Block 1 and 3 given a 3m standard; front yard setback of 4.5m and interior side yard setback of 2.5m in Block 4 given a 3m and 1.2m standard respectively)
 - Minimum distance to habitable room window would be removed as they exceed the new 1.8m parking area building setback standard in Section 5.2.8

- Carry forward those other regulations, which remain required to advance the development concept
- Add additional regulations where required, such as providing an exception to the requirement to aggregate 360 sm of common amenity area where that exceeds the reduced provision in Block 3

Does the above approximate your approach on these matters, or would you look for me to provide comment on a final draft that will come forward later this year to capture anything that should be adjusted?

I would also provide the following observations on the currently proposed residential zones:

- There is no regulation for an exterior side yard.
 - If the intention is for both the exterior and interior side yards to have the same setback provision, then this should be "side yard" rather than specifying "interior side yard". Currently, exterior side yard is not regulated in the residential zones, which could present challenges for staff and delays/confusion for applicants as staff attempt to impose one through approvals.
- The requirement to aggregate 360 sm of common amenity area can be very challenging.
 - For example, it would require a 24-unit development to provide all of its common amenity area in one location, which may be challenging on small sites and wouldn't result in a mix of indoor and outdoor amenities contemplated by the revised amenity area definition.
 - Perhaps a percentage of the total required common amenity area (50%?) or 360 sm, whichever is less, would resolve the issue.

I've made a more comprehensive set of non-project specific comments available to the WRCLC committee tasked with reviewing the CZBL, which will aggregate these and provide them to you in (hopefully) the near future.

Cheers, Jeff

Jeff Henry (he/him), RPP, MCIP

Urban Planner

Arcadis Professional Services (Canada) Inc.

Our new address: 420 Wes Graham Way, Suite 106 | Waterloo, ON | N2L 0J6 | Canada

[REDACTED]

[REDACTED]

[REDACTED]



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From: Henry, Jeff <[REDACTED]>
Sent: Thursday, May 15, 2025 4:37 PM
To: Bryan Cooper <CooperB@cambridge.ca>
Cc: Melissa Mohr <mohrm@cambridge.ca>
Subject: Re: Follow up from April 29, 2025 Council Meeting

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Thanks, Bryan.

On your comment that the site specifics in the new by-law will match what was approved on this site, the suggested updates I had offered prior to seeing your staff report (25-052-CD) are consistent with what I understand the intent of the below excerpt; specifically, it is my opinion that the site-specific regs I'd flagged as requiring adjustment are either inconsistent with the intent of form based zoning or made redundant due to the new by-law being generally more permissive.

I would also suggest an addition to your list of circumstances excerpted below that the new by-law may introduce new regulations/restrictions that would inhibit the planned/approved design. In our case, the common amenity area requirements on certain blocks were reduced to below the proposed new minimum aggregate common amenity area regulation, which we will not be able to meet based on the current draft. Perhaps this will be rectified through further refinements of the zoning by-law prior to adoption.

I'm certainly available to discuss this further — I suspect that is more fruitful once you've had a chance to incorporate the feedback you're being inundated with now!

Cheers, Jeff

[Excerpt from 25-052-CD at page 8](#)

Site specific amendments will generally not be carried forward into the new Zoning By-law if one or more of the following circumstances is met:

- 1) The development is built out.
- 2) If the site-specific amendment is written in a manner that is inconsistent with the intent of form-based zoning (e.g. the wording of the amendment restricts residential uses to only specific dwelling types, which would be in conflict with the form-based zoning objective of permitting a variety of residential dwelling types).
- 3) If the site-specific amendment is made redundant by the regulations of the new by-law (e.g. the new by-law is generally more permissive than the existing site-specific amendment).
- 4) If the site-specific amendment is inconsistent with the policy objectives of the City's Official Plan.

Jeff Henry (he/him), RPP, MCIP

Urban Planner

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May 6, 2025

By Email Only to *council@cambridge.ca*, *clerks@cambridge.ca* and *cooperb@cambridge.ca*



City of Cambridge Council
50 Dickson Street, 2nd floor
Cambridge, Ontario N1R 8S1

City Clerk
City of Cambridge
P.O. Box 669
Cambridge, Ontario N1R 5W8

Bryan Cooper, Senior Planner
Community Development Department
City of Cambridge
50 Dickson Street, 3rd floor
Cambridge Ontario N1R 8S1

Dear Members of Council and Mr. Cooper:

Re: Proposed Cambridge Comprehensive Zoning By-law (“CZBL”) and companion Official Plan Amendment (“OPA”)

We are counsel to John, Don, Larry, Douglas, James, Edward and Connie Hammer, Cathy Murphy and Veronica Kerr, who have an interest in a 14-hectare parcel of land at the northeast corner of Middle Block Road and Fountain Street North in the City of Cambridge (the “Subject Lands”). The lands are municipally known as  .

The Subject Lands are designated primarily “Greenfield Areas” under the Region of Waterloo’s Official Plan and primarily “Mixed-Use Node” under the North Cambridge Secondary Plan (the “Secondary Plan”), as part of a mixed-use node at the intersection of Middle Block Road and Fountain Street North.

The Subject Lands will be impacted by the CZBL, and they may be impacted by the OPA. As such, our clients have an interest in these instruments and any further changes that may be made to them.

Regarding the CZBL, there is a human-made drainage ditch which begins south of the woodlot on the Subject Lands and extends to Middle Block Road. The ditch was created to facilitate the irrigation of parts of the Hammer Lands for agricultural purposes. This appears to be the basis for zoning part of the Subject Lands as “Floodway”. We disagree that any part of the Subject Lands should be zoned “Floodway”, as it is inappropriate, unsupported and does not represent good land use planning. The extent of the Floodway zone also does not conform with the Secondary Plan designations of the Subject Lands. Further details regarding this issue are found in our letter to the City regarding the Secondary Plan dated June 25, 2024.

The CZBL also does not have a particular zone category that seems appropriate for the mixed-use node in the Secondary Plan. While this does not preclude site-specific zoning to permit the appropriate mixed use of the Subject Lands, it would be preferable to include a mixed-use zone in the CZBL that is not specific to certain geographical areas.

Please provide me with notice of any revisions to the CZBL or the OPA, notice of any reports or other documents going to Council regarding the CZBL or the OPA, and notice of Council’s decisions regarding the CZBL and the OPA.

Do not hesitate to contact me if you have any questions.

Sincerely,
DAVIES HOWE LLP



Kyle Gossen (he/him)

KG:yl

copy: Clients
David Riley, SGL Planning & Design Inc.



VIA EMAIL

May 5, 2025

Mayor and Members of Council
City of Cambridge
Cambridge, Ontario
N1R 8S1

Attention: Jennifer Shaw, Deputy City Clerk

**Re: May 6, 2025 Planning – Statutory Public Meeting Committee
Item 5.1: 2525-052-CD Public Meeting – Comprehensive Zoning By-law and Companion Official Plan Amendment
Preliminary Comments on Behalf of Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited
Cambridge, ON**

Our File: CAT/CAM/13-01

We are the planning consultants for Canadian Tire Corporation Limited, Canadian Tire Properties Inc. and Canadian Tire Real Estate Limited (“Canadian Tire”), which are the registered owner and/or lease holder of lands in the City of Cambridge, including:

- The Canadian Tire Store and commercial uses (lands owned by Canadian Tire Corporation) located at 75 Dundas Street North (Highland Shopping Centre);
- The Canadian Tire Gas Bar (leased by Canadian Tire Corporation) located at 11 Dundas Street North;
- Canadian Tire Store located at 65 Pinebush Road on lands owned by Canadian Tire Properties Inc.; and
- Canadian Tire Gas Bar and Car Wash located at 239 Fountain Street South on lands owned by Suncor Energy Inc.

On behalf of Canadian Tire, we have been monitoring the City of Cambridge Zoning By-law Review. On September 8, 2015 we provided comments for the Draft Zoning By-law (Draft No. 1) and on May 31, 2018, we provided comments for the Draft Zoning By-law (Draft No. 2).

On April 16, 2025, we received Notice of a Public Meeting where a revised Draft Zoning By-law dated April 2025 (the “Draft By-law”) and companion Draft Official Plan Amendment (the “Draft OPA”) will be considered at a May 6, 2025 Public Meeting. According to the Staff Report No. 25-052-CD dated May 6, 2025, it is our understanding that Staff recommend that Report 25-052-CD be received. It is also our understanding that the purpose of holding a statutory public meeting under the *Planning Act* is to explain the Draft By-law and companion Draft OPA as well as to obtain public and committee comments. Staff anticipate upcoming consultation in May and June with advisory committees and anticipate bringing the final Zoning By-law and companion Official Plan Amendment to Council for a decision in Fall 2025.

On behalf of Canadian Tire, we have the preliminary comments below for the Draft By-law and may provide further comments as required.

A summary of the Official Plan context, as well as the existing and proposed zoning for the Canadian Tire lands under the Draft By-law is as follows:

- 11 and 75 Dundas Street North:
 - The lands are within the Main and Dundas Secondary Plan, where according to Schedule B Land Use Plan, the lands are designated Mixed Use Mid-Rise High Density (75 Dundas Street North) and Mixed-Use Medium Density (11 Dundas Street North). According to Policy 20.3.2.2, “Lands designated with a Mixed-Use designation are intended to be the centre of the Community Node and generally provide the greatest mix of uses and highest densities within the Plan Area. *These areas are intended to continue to provide retail and service commercial uses* [emphasis added], while integrating residential housing, office, institutional, and community uses through infill and/or redevelopment. Lands designated with a Mixed-Use designation are intended to intensify and *transition* [emphasis added] to a compact urban form including medium to high density development and a reduction of surface parking.” Permitted uses in the Mixed-Use designation include “Commercial uses including retail, service commercial, and places of amusement uses, except any commercial uses prohibited in Section 20.3.1.2”. According to Policy 20.3.1.2, the following uses will be prohibited in all designations of the Secondary Plan: a) *New* [emphasis added] drive-through facilities subject to Section 20.3.1.4; b) *New* [emphasis added] auto-related uses subject to Section 20.3.1.4; c) *New* [emphasis added] large-format commercial uses subject to Section 20.3.1.5;
 - The lands at 75 Dundas Street North are zoned Neighbourhood Shopping Centre (CS4), S4.1.191 and the lands at 11 Dundas Street North are zoned Commercial 5 (C5) under By-law 150-85, as amended; and
 - The lands at 75 Dundas Street North are proposed to be zoned R2 1.190 and 1.469 and the lands at 11 Dundas Street North are proposed to be zoned R2 1.468.
- 65 Pinebush Road:
 - The lands are zoned Commercial 4 and General Industrial (C4/M1) under By-law 150-85, as amended; and
 - The proposed zoning for the lands is to be deferred and remain subject to By-law 150-85, as amended.
- 239 Fountain Street South:
 - The lands are zoned are Commercial 1 and Commercial 5 (C1/C5) under By-law 150-85, as amended; and
 - The proposed zoning for the lands is to be deferred and remain subject to By-law 150-85, as amended.

- In general, Canadian Tire wants to ensure that the development potential and existing zoning permissions for their stores and lands will not be compromised by the Draft By-law. In addition, Canadian Tire wants to ensure that the permissions previously secured through approved minor variances affecting their lands remain intact.
- Section 3.0 Definitions, includes the following relevant definitions:
 - Commercial motor vehicle: has the same meaning as in the Highway Traffic Act, as amended (according to the Highway Traffic Act, as amended, commercial vehicle “means a commercial motor vehicle, a motor vehicle towing a trailer or a vehicle used to transport passengers for compensation”);
 - Drive-through service use: the use of land, buildings or structures, or parts thereof including stacking lanes, to provide or dispense products or services, either wholly or in part, through an attendant at a window or an automated machine, to customers remaining in motorized vehicles;
 - Motor vehicle repair garage: an establishment where services performed or executed on motor vehicles for compensation and may include the installation of exhaust systems, repair of the electrical systems, transmission repair, brake repair, radiator repair, tire repair and installation, rustproofing, motor vehicle diagnostic centre, major and minor mechanical repairs or similar use, but does not include a motor vehicle body shop;
 - Outdoor display and sales area: an outdoor open space area, used in conjunction with the principal building or structure on the same lot, for the accessory display and/or sales of produce, merchandise or the supply of services in association with the primary use of the lot. Such a display and/or sales area may be wholly or partially contained within a temporary tent structure;
 - Retail store: an establishment in which goods, wares, merchandise, substances, articles or things are displayed, rented or sold directly to the public but does not include any use otherwise defined by this By-law;
 - Shopping centre: a commercial development, containing at least three individual business establishments, designed as a single, comprehensively planned development project with relationships between the shopping centre buildings, activities, open spaces, parking areas, loading areas, driveways, other shared facilities, public areas and adjoining streets, and held in single ownership or by participants in a condominium corporation or commercial cooperative.

We request clarification whether Canadian Tire stores would be interpreted as a “Retail store”, with an “Outdoor display and sales area” for the permanent garden centre component and “Motor vehicle repair garage” for the vehicle service component of the store; and

For the permanent Canadian Tire outdoor garden centre component, we request clarification that under the definition for “Outdoor display and sales area”, which states “Such a display and/or sales area may be wholly or partially contained within

- a temporary tent structure”, that the permanent frost structure would continue to be permitted;
- Section 4.6.3 relates to Rooftop Mechanical Equipment and Mechanical Penthouses. In our submission, the regulation (c) that "Rooftop mechanical equipment shall be set back a minimum of 5.0 metres from all edges of a roof if it is not fully enclosed within a mechanical penthouse or screened by an architectural feature" should recognize that existing buildings may be non-compliant and may remain legal conforming. It would be appropriate to include (c) within the draft regulation "Notwithstanding the above, rooftop mechanical equipment and mechanical penthouses that existed on the effective date of this By-law are exempt from sub-section (a)" by changing to "sub-sections (a) and (c)" from "sub-section (a)".
 - Section 4.12 states "Where an outdoor display and sales area is located on a lot, the following provisions apply: (a) The outdoor display and sales area shall be set back a minimum of 12 metres from a Residential Zone boundary". For the existing Canadian Tire Store at 75 Dundas Street North, we request clarification as to permissions for the Garden Centre Component and for an outdoor display and sales area where the lands are zoned R2;
 - Section 4.13 states "Where an outdoor commercial patio is located in conjunction with any restaurant on the same lot, the following provisions apply: (d) The patio shall be set back a minimum of 12 metres from a Residential Zone boundary". For the existing shopping centre at 75 Dundas Street North, we request clarification as to permissions for outdoor commercial patios where the lands are zoned R2. In addition, we suggest that a regulation be added that Section 4.13 does not apply to existing outdoor commercial patios;
 - Section 4.17 relates to Planting Strips. Section 4.17(a) requires a 3.0 m wide planting strip that is a minimum of 1.5 m in height. It is not clear as to how the minimum of 1.5 m in height is to be achieved with a planting strip. For example, under the corresponding existing Zoning regulations under Section 2.4.2.3 of Zoning By-law 150-85, as amended, options for planting strips include: (a) a minimum 3.0 m wide planting strip with plant materials forming a visual screen of not less than 1.5 m in height and fencing of 1.5 m in height; or (b) a minimum 3.0 m wide planting strip with an earth berm/fence of 1.5 m in height; or (c) a combination of (a) and (b); or a minimum 1.5 m wide sodded or planted strip with a 1.5 m high solid fence." In our submission, there should be similar options under the Draft By-law to achieve visual screening. In addition, in order to avoid rendering existing Planting Strips non-conforming, it would be appropriate to include a provision that planting strips that legally existed on the effective date of the By-law are exempt from the new requirement;

Section 4.27 for Waste Storage Areas states "(a) All waste generated by the occupants of 6 or more dwelling units on a lot or from any commercial, industrial or institutional use must be stored inside a building or waste receptacle on the same lot provided the waste storage building or deep well storage receptacle is: ..." In our submission, the regulations should continue to permit waste and recycling compactors, which are typically utilized for commercial uses such as Canadian Tire and food stores. We request clarification as to whether metal

-
- compactors for supermarket and retail uses would under (b) need to be "surrounded on three sides by masonry, concrete, or wooden walls in order to provide screening". A provision excluding supermarket and retail compactors from screening may be required. Accordingly, it would be appropriate to include a provision that Waste Storage areas that legally existed on the effective date of the By-law are exempt from the new requirement;
- Section 5.2.12(a) states "Unless otherwise permitted by this By-law, no more than one driveway is permitted to access a lot from a street or highway in the R1 and R2 Zones unless the lot has a lot frontage of 19 metres or greater and the driveways are set back from each other a minimum of 7.0 metres, measured along the streetline." We request confirmation that as the lands at 75 Dundas Street North have a lot frontage greater than 19 m, the multiple existing driveways will continue to be permitted;
 - Section 5.5 relates to Landscaping in Parking Areas, where Parking Area means "an open area of land not located within a public road or lane that is intended for the use of parking of electric and/or motor vehicles in marked parking spaces, but does not include a driveway or any area where electric and/or motor vehicles for sale, rent or repair are kept or stored." For (a) that states "Parking areas in all zones except the Core Area Zones that have 20 parking spaces or more shall contain a minimum of five percent (5%) of their area as landscaped open space", we suggest that additional clarity should be provided in order to understand how the required "minimum of five percent (5%) of their area as landscaped open space" will be calculated, including whether the landscaped open space is on a total site basis or if the requirement is for each parking area on site with over 20 spaces;
 - Section 5.6 states "The following provisions apply to the parking of commercial motor vehicles in Residential Zones: (a) The commercial motor vehicle shall be set back a minimum of 1.0 metre from any interior side lot line, exterior side lot line or rear lot line; (b) The commercial motor vehicle shall be on a driveway if parked in the open in the front yard or exterior side yard of a lot; (c) The commercial motor vehicle shall be no more than 7.0 metres in length (exclusive of hitch/tongue); (d) The commercial motor vehicle shall be no more than 2.7 metres in height, measured from the ground to the highest point of the commercial motor vehicle; and (e) No more than one commercial motor vehicle is permitted to park on a lot at one time." As the existing commercial uses on lands at 75 Dundas Street North require loading by commercial motor vehicles and the gas bar at 11 Dundas Street North requires gas delivery by commercial motor vehicles, we request clarification as to the implications of Section 5.6 for existing commercial uses in residential zones;
 - Section 5.9 and Table 5.9.1 relate to Non-Residential Parking Requirements. We request clarification as to what is intended by the "Retail Commercial Establishment" reference under Table 5.9.1.71 as it is not defined and it is not clear how the use is differentiated from a Retail Store under Table 5.9.1.72, which is defined;

- Based on the Parking Requirements in Section 5.9.1, we request clarification that the applicable rate for 75 Dundas Street North will be the Shopping Centre rate, including for the Canadian Tire store, according to Section 5.9.2.a) whereby “the minimum number of required parking spaces in a shopping centre is 1 parking space per 20 square metres of net floor area in the first storey and 1 space per 40 square metres of net floor area in any storey above the first storey” and the gas bar rate will be 1 per 35 square metres for office and retail components. We request clarification as to the intent for references to both office and retail components for the gas bar rate;
- For Section 5.14 for Loading Spaces, we request clarification as to any minimum requirements. In addition, we suggest that a regulation be added that Loading Spaces that legally existed on the effective date of the By-law are exempt from the new requirements;
- Section 5.16.1 for Drive-throughs states “Stacking spaces are required and shall be exclusive of any other parking space and aisle requirements contained within this By-law and shall be provided in accordance with Table 5.16.” For lands such as 75 Dundas Street North where existing Drive-throughs are located, we suggest that a regulation be added that this section does not apply to existing drive-through service uses in order to avoid rendering existing drive-throughs as non-compliant;
- Section 5.16.3 for Drive-throughs states “Stacking spaces and all order boxes using voice communication to order shall be located no closer than 15.0 metres from any Residential or Institutional Zone boundary.” For lands such as 75 Dundas Street North where existing Drive-throughs are located, we suggest that a regulation be added that this section does not apply to existing drive-through service uses in order to avoid rendering existing drive-throughs as non-compliant;
- Section 5.16.4 for Drive-throughs states “No stacking spaces, order boxes, or wall openings associated with a drive-through service use can be located in any required yard, or in front of a wall facing the front or exterior side lot line unless all of the components of a drive-through service use are located a minimum of 10 metres from the front and exterior lot lines.” For lands such as 75 Dundas Street North where existing Drive-throughs are located, we suggest that a regulation be added that this section does not apply to existing drive-through service uses in order to avoid rendering existing drive-throughs as non-compliant;
- Section 7.1.3 states “The R2 zone applies to serviced areas with smaller lot frontages. Like the R1 Zone, the full range of dwelling types would be permitted; however, regulations are more permissive and based on contemporary development regulations such as reduced front and side yard setbacks. Maximum building heights are limited to 4 storeys (14.0 m).” We request clarification as to the intent for the R2 zone for lands within the Mixed-Use designation under the Main and Dundas Secondary Plan where retail and service commercial uses are intended to continue and in particular for existing commercial uses in the form of a Shopping Centre and gas bar with larger lot frontages such as the lands at 11 and 75 Dundas Street North;
- According to Table 7.1 – Permitted Uses in Residential Zones, there are no commercial uses permitted in the proposed R2 zone. For the lands at 11 and 75

Dundas Street North for the existing gas bar and Shopping Centre, we request clarification as to the permitted commercial uses within the context of the Mixed-Use designation and associated policies as noted above under the Main and Dundas Secondary Plan;

- For Section 7.3 Zone Standards for the R2 Zone, as there are no regulations that would be applicable to the existing gas bar and Shopping Centre at 11 and 75 Dundas Street North, we request clarification as to the applicable zone regulations for commercial uses;
- Site Specific Regulation 14.1.190 for 75 Dundas Street North references the “(R3 1.190 and R3 1.469 Zone)”. As the lands at 75 Dundas Street North are proposed to be zoned R2, we request clarification as to the intent of the Draft By-law. Site Specific Regulation 14.1.190 states that the following provisions shall apply: “The lands shall be deemed to form part of the Highland Plaza at 75 Dundas Street North and the calculation of all or any of the aforementioned requirements shall be based on the whole shopping centre; The provisions of this by-law requiring single ownership of a shopping centre as defined shall not apply to the aforementioned site; Required off-street parking areas may be provided on the same lot or on an abutting lot, in the same zone as the use, building or structure for which such parking is required, where a registered agreement with the owner of such abutting lot provides for such parking areas and the required number of parking spaces for the combination of both sites is compiled with; The minimum rear yard for the building existing on the day of passing of this by-law shall be 0.0 m; The maximum lot coverage shall be 58% of the lot area.” In our submission, it would be appropriate to add site specific permitted uses and regulations to reflect the existing shopping centre and permit expansions and infill commercial development until such time that the lands are redeveloped with mixed use mid-rise high density development in accordance with the Mixed-Use designation under the Main and Dundas Secondary Plan;
- Site Specific Regulation 14.1.469 references the “Main/Dundas Mixed-Use Mid-Rise High Density (R3 Zone)”. As the lands at 75 Dundas Street North are proposed to be zoned R2, we request clarification as to the intent of the Draft By-law, particularly as the Permitted uses reference the R3 and CV zones, where a “shopping centre” is not a permitted use and a standalone commercial building is only permitted up to a maximum of 2,000 m² ground floor area. The Development Requirements including a minimum building height of 5 storeys/17.5 m as well as the requirements for main pedestrian access and minimum windows would render the existing shopping centre and Canadian Tire store as non-compliant; and
- Site Specific Regulation 14.1.468 references the “Main/Dundas Mixed-Use Medium Density (R3 Zone)” and “14.1.465”. As the gas bar lands at 11 Dundas Street North are proposed to be zoned R2 1.468, we request clarification as to the intent of the Draft By-law. Site Specific Regulation 14.1.468 states “On the lands which reference 14.1.465 on Zoning Maps K12 and L12, the following shall also apply: Permitted Uses: Uses permitted in Table 7.1, R3 Zone; Uses permitted in the CV Zone, within a standalone commercial building or a permitted residential building, up to a maximum of 2,000 m² ground floor area. Development Requirements: 1. Minimum Density: 60 units per hectare 2. Minimum Building

Height: 3 storeys/10.5m. 3. Maximum Building Height: 8 storeys/28 m 4. Dwelling units are not permitted in the portion of the first storey of a building which faces a street in land identified as "Active Frontage" in Chapter 20, Schedule D, of the Official Plan. 5. Location of main pedestrian access into building: Facing the street or highway 6. Minimum percentage of wall of first storey facing the street or highway that is to be the site of openings: 70%. Prohibited Uses: New drive-through service use". We request clarification as to the applicability for the existing one storey gas bar at 11 Dundas Street North and the implications for the existing building and use. In our submission, it would be appropriate to add site specific permitted uses and regulations to reflect the gas bar and permit expansions and infill commercial development until such time that the lands are redeveloped with medium density development in accordance with the Mixed-Use designation under the Main and Dundas Secondary Plan.

We would welcome the opportunity to meet with Staff to discuss our comments.

In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of approval of the Zoning By-law.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Canadian Tire Real Estate Limited (via email)

VIA EMAIL

May 5, 2025

Mayor and Members of Council
City of Cambridge
Cambridge, Ontario
N1R 8S1

Attention: Jennifer Shaw, Deputy City Clerk

**Re: May 6, 2025 Planning – Statutory Public Meeting Committee
Item 5.1: 2525-052-CD Public Meeting – Comprehensive Zoning By-law and Companion Official Plan Amendment
Preliminary Comments on Behalf of Loblaw Companies Limited
Cambridge, ON**

Our File: LPL/CAM/11-01

We are the planning consultants for Loblaw Companies Limited (“Loblaw”) for the City of Cambridge Zoning By-law Review. Loblaw is the lease holder of the following lands within the City of Cambridge:

- The Loblaw Distribution Centre lands located at 1105 Fountain St. N. owned by CP REIT Ontario Properties Limited, which are currently zoned M3 s.4.1.70 and are proposed to be zoned M3 1.70;
- The Zehrs Market lands located at 180 Holiday Inn Dr. owned by CP REIT Ontario Properties Limited, which are currently zoned CS3 s.4.1.123.2 and are proposed to be zoned CC2;
- The Zehrs Market lands located at 400 Conestoga Blvd. owned by CP REIT Ontario Properties Limited, which are currently zoned CS1 s.4.1.1 and the proposed zoning for the lands is to be deferred and remain subject to By-law 150-85, as amended;
- The Zehrs Market lands located at 200 Franklin Blvd. owned by RioCan Holdings Inc., which are currently zoned CS3 s.4.1.82 and are proposed to be zoned R2 1.469;
- The No Frills lands located at 980 Franklin Blvd. owned by Nuelgin Investments Limited, which are currently zoned RM3 s.4.1.192 and are proposed to be zoned R3 1.192 (residential) and NC 1.192 (No Frills and Shopping Centre); and
- The Zehrs Market lands located at 1565 King St. E. owned by Sitzer Group Holdings No. 2 Limited, which are currently zoned CS5 and the proposed zoning for the lands is to be deferred and remain subject to By-law 150-85, as amended.

We have been monitoring the Zoning By-law Review process on behalf of Loblaw, and we provided preliminary comments dated October 6, 2015, May 25, 2018 and July 17, 2019.

On April 16, 2025, we received Notice of a Public Meeting where a revised Draft Zoning By-law dated April 2025 (the “Draft By-law”) and companion Draft Official Plan Amendment (the “Draft OPA”) will be considered at a May 6, 2025 Public Meeting. According to the Staff Report No. 25-052-CD dated May 6, 2025, it is our understanding that Staff recommend that Report 25-052-CD be received. It is also our understanding that the purpose of holding a statutory public meeting under the *Planning Act* is to explain the

Draft By-law and companion Draft OPA as well as to obtain public and committee comments. Staff anticipate upcoming consultation in May and June with advisory committees and anticipate bringing the final Zoning By-law and companion Official Plan Amendment to Council for a decision in Fall 2025.

On behalf of Loblaw, we have the preliminary comments below for the Draft By-law and may provide further comments as required.

Preliminary Comments for the Draft By-law:

- In general, Loblaw wants to ensure that the development potential and existing zoning permissions for their stores will not be compromised by the Draft By-law. In addition, Loblaw want wants to ensure that the permissions previously secured through approved minor variances affecting their stores remain intact.
- Section 3.0 Definitions, includes the following relevant definitions:
 - Commercial motor vehicle: has the same meaning as in the Highway Traffic Act, as amended (according to the Highway Traffic Act, as amended, commercial vehicle “means a commercial motor vehicle, a motor vehicle towing a trailer or a vehicle used to transport passengers for compensation”);
 - Logistics Distribution Centre: an industrial facility used for, but not limited to, the assembly, storing, sorting, processing and distribution of goods, the management of inventory and the temporary on-site storage of commercial motor vehicles or trailers for freight handling;
 - Outdoor display and sales area: an outdoor open space area, used in conjunction with the principal building or structure on the same lot, for the accessory display and/or sales of produce, merchandise or the supply of services in association with the primary use of the lot. Such a display and/or sales area may be wholly or partially contained within a temporary tent structure;
 - Outdoor Storage: an area of land that is accessory to the principal use on the same lot, for the storage of goods and materials in the open air or in portable objects such as shipping containers;
 - Retail store: an establishment in which goods, wares, merchandise, substances, articles or things are displayed, rented or sold directly to the public but does not include any use otherwise defined by this By-law;
 - Shopping centre: a commercial development, containing at least three individual business establishments, designed as a single, comprehensively planned development project with relationships between the shopping centre buildings, activities, open spaces, parking areas, loading areas, driveways, other shared facilities, public areas and adjoining streets, and held in single ownership or by participants in a condominium corporation or commercial cooperative; and
 - Warehouse: a building or part thereof, which is used primarily for the housing, storage, adapting for sale, packaging or wholesale distribution of goods, wares, merchandise, food stuff substances and articles.

As references to a "Supermarket" use have been removed from the Draft Zoning By-law, we request confirmation that a supermarket or food store will be interpreted as a Retail Store; and

For the existing distribution centre at 1105 Fountain St. N, we request clarification as to whether the parking of trailers and tractor staging would be interpreted as "outdoor storage". In addition, we request clarification as to whether the existing distribution facility would be interpreted as a "logistics distribution centre" or "warehouse" since they are separately defined. We note that site specific Section 14.1.70 refers to permissions for "warehousing and storage";

- Section 4.6.3 relates to Rooftop Mechanical Equipment and Mechanical Penthouses. In our submission, the regulation (c) that "Rooftop mechanical equipment shall be set back a minimum of 5.0 metres from all edges of a roof if it is not fully enclosed within a mechanical penthouse or screened by an architectural feature" should recognize that existing buildings may be non-compliant and may remain legal conforming. It would be appropriate to include (c) within the draft regulation "Notwithstanding the above, rooftop mechanical equipment and mechanical penthouses that existed on the effective date of this By-law are exempt from sub-section (a)" by changing to "sub-sections (a) and (c)" from "sub-section (a)".
- Section 4.12 states "Where an outdoor display and sales area is located on a lot, the following provisions apply: (a) The outdoor display and sales area shall be set back a minimum of 12 metres from a Residential Zone boundary; (b) The outdoor display and sales area shall be located outside of any required parking spaces, loading areas, sidewalks and required planting strips; and (c) Notwithstanding subsection (b), if the outdoor sales and display area is temporary (meaning a period of time not exceeding 120 days in a calendar year), it may occupy up to 10% of the parking spaces required by this By-law for the uses that exist on the same lot." The existing Loblaw garden centres associated with commercial uses are expected to require Minor Variances for compliance. In our submission, the requirements should be the subject of further review and consideration by Staff;
- Section 4.14 for Outdoor Storage states "Where accessory outdoor storage is located in an Employment Zone, the following provisions apply: (a) Outdoor storage is permitted only in a rear yard and shall not be located any closer than 9.0 metres to any lot line abutting a street. (b) The height of stored materials shall not exceed the height of the principal building on the lot, or 12 metres, whichever is the lesser. (c) The outdoor storage shall be screened by opaque fencing with a minimum height of 2.1 metres or a berm with a minimum height of 3.0 metres; and (d) Outdoor storage is not permitted within any yard abutting a Residential Zone. As noted above, for the existing distribution centre at 1105 Fountain St. N, we request clarification as to whether the parking of trailers and tractor staging would be interpreted as "outdoor storage". In our submission, the requirements should be the subject of further review and consideration by Staff as to implications for warehouse distribution centres;
- Section 4.17 relates to Planting Strips. Section 4.17(a) requires a 3.0 m wide planting strip that is a minimum of 1.5 m in height. It is not clear as to how the minimum of 1.5 m in height is to be achieved with a planting strip. For example,

under the corresponding existing Zoning regulations under Section 2.4.2.3 of Zoning By-law 150-85, as amended, options for planting strips include: (a) a minimum 3.0 m wide planting strip with plant materials forming a visual screen of not less than 1.5 m in height and fencing of 1.5 m in height; or (b) a minimum 3.0 m wide planting strip with an earth berm/fence of 1.5 m in height; or (c) a combination of (a) and (b); or a minimum 1.5 m wide sodded or planted strip with a 1.5 m high solid fence.” In our submission, there should be similar options under the Draft By-law to achieve visual screening. In addition, in order to avoid rendering existing Planting Strips non-conforming, it would be appropriate to include a provision that planting strips that legally existed on the effective date of the By-law are exempt from the new requirement;

- Section 4.27 states that Waste Storage areas states “(a) All waste generated by the occupants of 6 or more dwelling units on a lot or from any commercial, industrial or institutional use must be stored inside a building or waste receptacle on the same lot provided the waste storage building or deep well storage receptacle is: ...” In our submission, the regulations should continue to permit waste and recycling compactors, which are typically utilized for commercial uses such as food stores.

Section 4.27(a)(i) states that Waste Storage areas shall be “Located within the interior side or rear yard”, which may render existing waste storage areas as non-compliant with an impact on the No Frills located at 980 Franklin Blvd., the Zehrs located at 200 Franklin Blvd. and the Zehrs Market located at 400 Conestoga Blvd., resulting in the need for site specific exceptions, and does not conform with Official Plan policy 5.7.8 that states “*Where possible* [emphasis added], servicing, loading, waste storage areas and building utilities/mechanical equipment will be located internal to the building or to the rear of the building and will be screened from view from adjacent streets”, where there is flexibility as to the location of Waste Storage areas.

We request clarification as to whether metal compactors for supermarket and retail uses would under (b) need to be “surrounded on three sides by masonry, concrete, or wooden walls in order to provide screening”. A provision excluding supermarket and retail compactors from screening may be required.

Lastly, in our submission, it would be appropriate to include a provision that Waste Storage areas that legally existed on the effective date of the By-law are exempt from the new requirement;

- Section 5.2.12(a) states “Unless otherwise permitted by this By-law, no more than one driveway is permitted to access a lot from a street or highway in the R1 and R2 Zones unless the lot has a lot frontage of 19 metres or greater and the driveways are set back from each other a minimum of 7.0 metres, measured along the streetline.” We request confirmation that as the lands at 200 Franklin Blvd. have a lot frontage greater than 19 m, the multiple existing driveways will continue to be permitted;
- Section 5.5 relates to Landscaping in Parking Areas, where Parking Area means “an open area of land not located within a public road or lane that is intended for the use of parking of electric and/or motor vehicles in marked parking spaces, but

- does not include a driveway or any area where electric and/or motor vehicles for sale, rent or repair are kept or stored." For (a) that states "Parking areas in all zones except the Core Area Zones that have 20 parking spaces or more shall contain a minimum of five percent (5%) of their area as landscaped open space", we suggest that additional clarity should be provided in order to understand how the required "minimum of five percent (5%) of their area as landscaped open space" will be calculated, including whether the landscaped open space is on a total site basis or if the requirement is for each parking area on site with over 20 spaces. In addition, for employment uses such as warehouse distribution centres, providing a minimum of five percent (5%) of Parking Areas as landscaped open space may lead to implications for their operation;
- Section 5.6 states "The following provisions apply to the parking of commercial motor vehicles in Residential Zones: (a) The commercial motor vehicle shall be set back a minimum of 1.0 metre from any interior side lot line, exterior side lot line or rear lot line; (b) The commercial motor vehicle shall be on a driveway if parked in the open in the front yard or exterior side yard of a lot; (c) The commercial motor vehicle shall be no more than 7.0 metres in length (exclusive of hitch/tongue); (d) The commercial motor vehicle shall be no more than 2.7 metres in height, measured from the ground to the highest point of the commercial motor vehicle; and (e) No more than one commercial motor vehicle is permitted to park on a lot at one time." As the existing supermarket on lands at 200 Franklin Blvd. requires loading deliveries by commercial motor vehicles, we request clarification as to the implications of Section 5.6 for existing commercial uses in residential zones;
 - Section 5.9 and Table 5.9.1 relate to Non-Residential Parking Requirements. We request clarification as to what is intended by the "Retail Commercial Establishment" reference under Table 5.9.1.71 as it is not defined and it is not clear how the use is differentiated from a Retail Store under Table 5.9.1.72, which is defined;
 - For Section 5.14 for Loading Spaces, we request clarification as to any minimum requirements. Section c) states: "a loading space is not permitted ... in an exterior side yard; and/or, in any front yard". This provision may have an impact on the No Frills located at 980 Franklin Blvd., the Zehrs located at 200 Franklin Blvd. and the Zehrs Market located at 400 Conestoga Blvd., resulting in the need for site specific exceptions, and does not conform with Official Plan policy 5.7.8 that states "*Where possible* [emphasis added], servicing, loading, waste storage areas and building utilities/mechanical equipment will be located internal to the building or to the rear of the building and will be screened from view from adjacent streets", where there is flexibility as to the location of loading spaces. Lastly, we suggest that a regulation be added that Loading Spaces that legally existed on the effective date of the By-law are exempt from the new requirements;
 - Under Table 8.2.2. Standards the Commercial Zones, the Minimum required landscaped open space is "20%". In our submission, 20 percent landscaped open space is considerably in excess of the requirements in other municipalities and may result in less intensive development. In order to avoid rendering existing developments as non-complying, Special Provision (2) "As legally existing on the

effective date of this By-law” should be applicable, whereby the Standard would be “20% or (2)”;

- For 200 Franklin Blvd.:
 - The lands are within the Main and Dundas Secondary Plan, where according to Schedule B Land Use Plan, the lands are designated Mixed Use Mid-Rise High Density. According to Policy 20.3.2.2, “Lands designated with a Mixed-Use designation are intended to be the centre of the Community Node and generally provide the greatest mix of uses and highest densities within the Plan Area. *These areas are intended to continue to provide retail and service commercial uses* [emphasis added], while integrating residential housing, office, institutional, and community uses through infill and/or redevelopment. Lands designated with a Mixed-Use designation are intended to intensify and *transition* [emphasis added] to a compact urban form including medium to high density development and a reduction of surface parking.” Permitted uses in the Mixed-Use designation include “Commercial uses including retail, service commercial, and places of amusement uses, except any commercial uses prohibited in Section 20.3.1.2”. According to Policy 20.3.1.2, the following uses will be prohibited in all designations of the Secondary Plan: c) *New* [emphasis added] large-format commercial uses subject to Section 20.3.1.5;
 - Section 7.1.3 states “The R2 zone applies to serviced areas with smaller lot frontages. Like the R1 Zone, the full range of dwelling types would be permitted; however, regulations are more permissive and based on contemporary development regulations such as reduced front and side yard setbacks. Maximum building heights are limited to 4 storeys (14.0 m).” We request clarification as to the intent for the R2 zone for lands within the Mixed-Use designation under the Main and Dundas Secondary Plan where retail and service commercial uses are intended to continue and in particular for existing commercial uses in the form of a Shopping Centre with larger lot frontages such as the lands 200 Franklin Blvd.;
 - According to Table 7.1 – Permitted Uses in Residential Zones, there are no commercial uses permitted in the proposed R2 zone. For the lands at 200 Franklin Blvd. and the existing Shopping Centre, which includes the Zehrs food store, we request clarification as to the permitted commercial uses within the context of the Mixed-Use designation and associated policies as noted above under the Main and Dundas Secondary Plan;
 - For Section 7.3 Zone Standards for the R2 Zone, as there are no regulations that would be applicable to the existing Shopping Centre at 200 Franklin Blvd., we request clarification as to the applicable zone regulations for commercial uses; and
 - Site Specific Regulation 14.1.469 references the “Main/Dundas Mixed-Use Mid-Rise High Density (R3 Zone)”. As the lands at 200 Franklin

Blvd. are proposed to be zoned R2, we request clarification as to the intent of the Draft By-law, particularly as the Permitted uses reference the R3 and CV zones, where a "shopping centre" is not a permitted use and a standalone commercial building is only permitted up to a maximum of 2,000 m² ground floor area. The Development Requirements including a minimum building height of 5 storeys/17.5 m as well as the requirements for main pedestrian access and minimum windows would render the existing Zehrs store as non-compliant.

- For 1105 Fountain Street North:
 - Under Table 5.9.1 of the Draft Zoning By-law, the proposed parking requirement for a "logistics distribution centre" is 1 per 100 sq. m of net floor area, while a "warehouse" use is 1 space per 150 sq. m of net floor area. As noted above, we request clarification as to whether the existing distribution facility would be interpreted as a "logistics distribution centre" or "warehouse". In order to carry-over the existing parking requirement under Zoning By-law No.150-85, as amended, we request that a site specific exemption to be added to s.14.1.70, that "Notwithstanding the parking requirements under Table 5.9.1 - Non-residential Parking Requirements, an area equivalent to 20% of the lot area shall be provided as a parking lot and shall be provided in addition to any parking spaces or parking lot used or reserved for the purpose of storing heavy vehicles, equipment, machinery, stock or the fleet vehicles of a courier or delivery service"; and
 - In Table 9.3 Standards for Employment Zones, there is a proposed maximum building height under 9.3.8, which is not regulated under the current Zoning By-law. In order to provide flexibility for future intensification of the lands, we request that a site specific exemption be added to s.14.1.70, to notwithstanding the proposed maximum height of 21 m under Table 9.3.8.

We would welcome the opportunity to meet with Staff to discuss our comments.

In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of approval of the Zoning By-law.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Loblaw Companies Limited (via email)

June 6, 2025

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
City of Cambridge
50 Dickson Street
Cambridge, ON N1R 5W8

**RE: New Comprehensive Zoning By-law
Comments of the City of Cambridge Home Builders Liaison Committee**

On behalf of the Cambridge Home Builders Liaison Committee, we have reviewed the draft Regulations of the new City of Cambridge Comprehensive Zoning By-law. We note that our review has been generally focused on the residential related regulations of the draft by-law.

Overall, there are many positives when compared to the current Zoning By-law. We appreciate the work that has gone into the preparation of this draft and are supportive in the reduction in the total number of zones and the simplification of the by-law as a whole. Further suggestions and any concerns are outlined herein. For ease of review, our comments follow the current order of the draft zoning by-law.

Previous Approvals (Section 1.5)

We are concerned with Section 1.5.3 related to previous site plan approvals. Previous site plan approvals should continue to be recognized without an expiration date, or at a minimum the timeframe to obtain building permit should be extended to a minimum of three (3) years.

As the City is aware, the market conditions are extremely challenging and several projects have been forced to be put on hold until economic conditions improve. We are concerned that projects that in some cases took multiple years to get through site plan approval, would potentially require new planning approvals in order to proceed. Further, the clause as currently written would be challenging for multi-phase sites which may result in more than one building permit. If the City continues to include an expiration date, language should be added for multi-phased sites that the first building permit is required to be issued within the timeframe.

Transition Clauses for Applications in Process (Section 1.6)

The Building Permit Applications section should provide for complete applications made prior to the date of passing to proceed to issuance within a period of time, and then to construction.

The transition clause for sites plans (Section 1.6.3) should be modified to recognize any active site plan application, not only those applications filed 6 months prior to the passing of the by-law. As previously noted, the site plan approval process can take more than a year to complete. It could

cause significant delays to projects if site plans that have been in process for more than 6 months would suddenly need significant redesign/zoning relief. Further, it would appear there is no time expiry for approved site plans where a complete application was made up to 6 months prior to by-law approval, which is substantially more flexible than when site plan approval has been granted. The same flexibility should be afforded in both instances.

As a general comment, transition clauses should also consider transition for “complete applications” to capture other on-going planning approvals including any recently approved Zoning By-law Amendments that have not yet gone through the site plan approval process. A reasonable Sunset Clause could be included for applications deemed complete prior to the passing of the zoning by-law.

Non-Compliance as a Result of Land Acquisition by a Public Authority (Section 1.8.2)

We suggest an expansion of the regulations noted in part (a), similar to Kitchener provisions, which also includes yards and FSR/FSI.

Definitions (Part 3):

Amenity Area: The inclusion of “common area” in the definition of Amenity Area would suggest that private balconies are no longer considered amenity area. Given balconies and patios are listed and given there is a separate definition for *Common Amenity Area*, we do not believe this was the intent. Suggest the following as alternative wording.

Amenity Area: ~~a common~~ an area used for indoor and/or outdoor recreational uses and which may include patios and landscaped open space, balconies, decks, swimming pools, rooftop patios, communal lounges and other similar areas.

Common Amenity Area: The definition of Common Amenity Area identifies that these areas are to be designed and accessed by all the occupants of the use. Without a definition of “Private Amenity Area’ and with the current wording of the Amenity Area definition, we are concerned that private amenity spaces will not be counted towards amenity space requirements.

Consider adding a definition for private amenity area with confirmation in the definition that minimum amenity space requirements include both private and common amenity areas.

Electric Vehicle Parking Space: Most municipalities have provided an EV-ready definition, which kicks in for residential uses, allowing owners/tenants to provide their own installations without the cost of retrofitting or extending infrastructure. This ties back the broader concern regarding 20% EV parking stalls as opposed to EV ready stalls, which can add to the cost of housing without meeting a specific market demand. It would be helpful to understand how EV charging stations are calculated towards unitized parking and visitor parking.

Height: Based on the definition of grade, this provides for height based on the average grade as measured around the entire building at the proposed grades. This is similar to the current approach, but requires detailed grading information at early stages of planning that may change through detailed design and cause issues if height is tight or is shrink-wrapped through ZBA or MV.

Consider an alternative definition that defines building height as the vertical distance between the highest finished grade level at the perimeter of the building and the uppermost point of the building. Consideration should also be given to excluding features such as antennae, chimneys, spires, cupolas, elevator penthouses, or other similar features in calculating building height. This could be added to the definition.

Landscaped Open Space: We are wondering why are patios excluded from Landscape Open Spaces and note that patios are included in common amenity area definition, as is landscaped open space as a whole. Should the restriction on patios being included as Landscaped Open Space specifically refer to private patios?

Barrier-Free Entrances to Dwellings with Separate Entrances from Exterior (Section 4.3.1)

We understand that this is a new requirement to introduce accessibility requirements into missing middle housing forms. Providing barrier free entrances may require substantial encroachments for ramps. Section 4.5 does not include ramps under permitted encroachments. Is it the intent that Section 4.2 provides such permitted encroachments to the extent necessary to provide barrier-free entrances?

Encroachments into Required Yards (Excluding Decks and Porches) (Section 4.5)

No encroachments into interior side yards are permitted for stairs and landings that access any part of the principal building. This may be limiting for missing middle housing where such entrances are often required. If the landing has a "roof" then it is a porch and may encroach up to 0.6m from the interior side lot line but if it does not have a "roof" and so is less of a visible intrusion into the side yard then it may not encroach.

Rooftop Mechanical Equipment and Mechanical Penthouses (Section 4.6.3)

The height in which a mechanical penthouse is triggered (subsection b) seems low given 4.6.3 (c) will ensure up to 5m in height would be screened from view based on a 45-degree angular plane at the roof edge.

Minimum Setbacks from Specified Roads (Section 4.9)

We would appreciate the opportunity to discuss this regulation. Is the intent to capture those properties where a Planning Act Application is not required (i.e. proposals with 10 units or fewer?). The current wording of this regulation would suggest you cannot have any reduction in front yard

where a potential road widening may occur, whereas often reduced setbacks are accepted in the case of a widening.

Reduced and Increased Front Yard Requirement (Section 4.18)

Was the intent that these regulations would only apply to certain areas within the City? As currently worded it would appear to apply City-Wide. It is unclear why front yard setbacks need to be determined based on the setbacks of abutting developed lots. This type of design direction should be a guideline not regulated, and if regulated, should only apply in areas where a consistent setback is a defining characteristic of a neighbourhood (for example, within a heritage district where consistent setbacks forms part of the heritage attributes of the area). The way Section 4.18 is worded, it could require a different front yard setback than the setbacks of the zone within which the property is located.

This regulation may frustrate the intent of the R zones to permit infill intensification in missing middle formats for neighbourhoods with excessive existing setbacks. Further, it may limit opportunities to increase rear yards in areas where height transition/increased setbacks are desired from a compatibility perspective if a large front yard setbacks is triggered by these regulations.

Further, while not the mandate of this group, the City should consider the impact of these regulations on non-residential lots. For example, in commercial areas where the City is encouraging buildings set close to the street, these regulations could result in significant building setbacks if adjacent to a commercial property that has the building located at the rear of the site.

Provisions for Detached ARU's (Section 4.19.2)

Setback provision (a)(iii) should be consistent with accessory building regulations. Laneway ARUs are often converted garages, which tend to be closer than the 3m setback prescribed.

The City should ensure that the maximum coverage does not conflict with recent legislation related to Additional Residential Units. that there is a maximum lot coverage of 10% for ARU's. Committee members to confirm if we want to comment/ have concerns with this.

It would be helpful to understand how servicing will work for ARU's. Will the City permit 2 laterals off of the one existing? We recognize this may not be covered off in the zoning but it would be helpful to understand.

Site Line Triangles (Section 4.21)

Suggest consideration be given to the constrained downtown districts in Galt, Preston, and Hespeler where no such sight lines exist.

Railway Right-of-Way Setback (Section 4.22.1)

This does not align with the RAC-FCM Guidelines as the right-of-way setback differs by the type of line. Further, the RAC-FCM Guidelines specify that the setback is to the sensitive use within the building not necessary the building itself. Further, the setback can also be achieved as combined horizontal and vertical separation (for example, a residential tower sitting on top of a parking podium with a crash wall could have the crash wall immediately adjacent to the rail line with the residential units setback a combined distance of 30 metres through both horizontal and vertical separation).

Special Height Provisions Adjacent to the Region of Waterloo International Airport (Section 4.23)

Has there been coordination of the Region to provide transparency on any limitations?

General Parking Provisions (Section 5.2)

Do parking spaces provided in tandem count toward required parking spaces? This is clear in the ARU regulations in 4.19 but is not clear for any uses in this section. Where the by-law requires 2 spaces per unit for singles, semis, and towns, one of these spaces is typically provided in tandem with a space in a garage. Clarification of this within the by-law would be appreciated.

Size of Parking Spaces in a Parking Area or Parking Garage (Section 5.2.6)

The draft by-law carries forward parking dimensions from the current by-law (2.75 metres by 5.5 metres). There are multiple instances where this regulation has been varied and reduced widths have been supported by the City and Committee. A reduced parking width should be considered to reduce the need for variances or zoning relief and to be more consistent with other urban municipalities. In our experience most by-laws require a parking stall width of 2.5 metres (example, City of Waterloo) or 2.6 metres (example, City of Kitchener).

Driveways from a Street or Highway (Section 5.2.12)

With respect to clause (b), Residential Zone permissions provide for minimum lot widths less than this minimum separation from intersections and certainly less than minimum separation plus minimum driveway widths, which would require rear yard parking accessed by exterior side yard driveways.

With respect to clause c), this is significantly limiting given minimum lot frontages can be less than 33 m.

Landscaping in Parking Areas (Section 5.5)

Does the 3.0 metre wide planting strip required in clause (d) count toward the 5% required in 5.5(a)? 20+ parking space layouts can be compact and do not always lend themselves to providing

landscaped open spaces within the parking areas, particularly where all parking spaces are accessed from one central drive aisle.

Parking Requirements (Table 5.8)

Consider reducing parking requirements for ARU's within the CMU1, 2, 3 zones as they are for Garden Suites.

Parking requirements for apartments continue to be excessive compared to other urban areas where transit is available. At a minimum the visitor parking ratio should be reduced for Rows 2 and 12 of Table 5.8. A 25% visitor parking rate is too high, in particular when we should be looking at ways to reduce parking on-site. Most urban municipalities have reduced their visitor parking in newer by-laws to 10%. We strongly encourage the City to consider reducing this rate to a more modern standard, in particular if the residential rates will be remaining consistent with the current by-law.

Parking for single detached, semi-detached, back-to-back townhouse and townhouse dwelling unit is excessive at 2.0 spaces per unit and will constrain missing middle development. One space per dwelling unit should be sufficient. If the requirement remains at 2.0 spaces clarity should be provided with respect to tandem parking spaces (i.e. on space in the driveway and one in the garage).

Shared Parking Outside of Core Areas (Section 5.11)

Consider revising the language of this regulation such that the parking reduction applies to a mixed-use building containing two or more non-residential *units* as opposed to two or more non-residential *uses*. At the site plan stage, the end tenant for commercial space is often not yet confirmed and over the life of the building the uses are likely to change. There could be scenarios where there are multiple commercial units within a building but the end use could all be the same (e.g. three separate take out restaurants as an example). The more flexible wording of "units" would permit flexible non-residential occupancy of a building, removing red tape from setting up new businesses.

Electric Vehicle Parking Requirements (Section 5.12)

We are extremely concerned with the regulation requiring 20% of required spaces to be fully electric with charging stations. The regulation should be revised to require a percentage of EV Ready parking stalls to provide for residential uses to permit future owner/tenant installation (similar to other municipalities). The regulation as worded will add significant costs to an overall project and within a condo corporation, higher long-term carrying costs that will ultimately impact the condo fees paid by residents, many of which will not be receiving the benefit of the spaces.

If in a plaza with more than one of the non-residential uses in the list, does the "more than 10 parking spaces" mean that more than 10 parking spaces are required for any one of the below uses, or is it additive of all uses on a site?

Accessible Parking Space Requirements (Section 5.13)

Regulations should provide that access aisles may be shared between accessible parking spaces.

Bicycle Parking (Section 5.15)

We support the inclusion of bicycle parking within developments. The City should include a reasonable minimum standard and incentivize developers to build more than the minimum. For example, consideration should be given to building in parking reductions in instances where bicycle parking exceeds the minimum by-law requirement.

We do note that our experience on built sites that have incorporated indoor secure bicycle parking, is that these rooms are largely empty. Most residents continue to store bikes in their units as bike rooms are at a constant risk of theft and break-ins. While the long-term bicycle parking space requirements are similar to other area municipalities, those municipalities typically have reduced vehicle parking requirements when compared to the Cambridge requirements. If vehicle parking spaces are not reduced from current requirements, there should be consideration to bicycle parking at lower rates than what is being proposed (in particular given the reality of how these spaces are being utilized in existing developments).

We would suggest removing the regulations around the location for short-term bicycle parking spaces. There could be existing site constraints that make these regulations difficult to achieve. The location of bicycle parking can be reviewed together with planning staff through the detailed site plan process.

In Table 5.15 (A), Short-Term Bicycle parking for Apartment Dwelling Units appears to be required at a rate of 0.05 spaces per unit. We further understand that notwithstanding that rate there is a requirement for a minimum of 4 spaces regardless of the number coming out of the calculation (more than 80 units would need to be provided before this set minimum is exceeded). The maximum of 12 is also written as a maximum of what can be *provided*. We believe the intent of this was that a maximum of 12 shall be *required* (not provided). We assume if additional bicycle parking (beyond the by-law requirement) is provided this would be permitted. The same comment applies to the Multiple Dwellings and Stacked Townhouse Units within the same table.

For Multiple Dwellings and Stacked Townhouse units the min/max bicycle requirements are per block. The regulation should be flexible in that the calculation apply to the block, but the provision of the bike parking can be centralized. We want to ensure there is flexibility as to where bike racks are located within a development (also this would potentially conflict with regulation 5.15 (g) if the intent is that each block would have it's own short-term bike parking area.

Places of Worship (Section 6.4)

These provisions effectively prohibit reasonable conversion of places of worship that no longer have sustaining congregations. These provisions will not "save" historic churches and instead will work against the opportunity to explore adaptive reuse (something that is encouraged under the Ontario Heritage Act). It would be helpful to discuss the intent behind these regulations.

Zoning Standards for Core Area Zones (Table 6.5)

The regulations and FSI in Table 6.5 would seemingly restrict redevelopment options within the core areas.

The minimum amenity requirement of 15.0 m² per dwelling unit is quite high compared to other area municipalities (which require typically 4-8 metres per unit, with private balconies permitted towards the amenity requirement). As previously noted, it is unclear if private balconies count towards amenity space requirements. Permitting such areas within the requirement would support a range of amenity areas, private and common, to be provided for residents.

Residential Zones (Part 7)

We are supportive of the reduction in the total number of residential zones, now four (4) zones compared to the existing 16 residential zones. Further, we are supportive of the removal of density restrictions in the zoning by-law. This change should allow for greater design flexibility and context specific design.

Below are our suggestions with respect to the draft zones as proposed:

Residential One (R1) – Detached:

Regulation	Requirement	Suggestion
Min. Lot Frontage	15.0m (49 feet)	12.2m (40 feet) This would provide for modest infilling opportunities on large lots.
Building Height	3 storeys / 10.5m	No change
Front Yard Setback	6.0m	3.0m (dwelling), 6.0m (garage)
Interior Side Yard Setback	1.2m	1.2m on one side, 0.6m on other side to provide for modest infill opportunities.
Exterior Side Yard Setback	No regulation noted	Clarification on exterior yard requirements would be helpful.
Rear Yard Setback	7.5m	7.0 m

Notes:

Suggest a lower minimum lot frontage to accommodate a greater range of lot sizes. Front yard and interior side yard setback revisions proposed to be consistent across all zones.

Residential One (R1) – Attached

Regulation	Requirement	Suggestion
Min. Lot Frontage	7.5m (24 feet)	6.0m (19.6 feet)
Building Height	3 storeys / 10.5m	Stacked townhomes typically require a building height of 11 metres, suggest increasing maximum height within the R1 Zone for Attached units. No Change within R2 and R3.
Front Yard Setback	6.0m	3.0m (dwelling), 6.0m (garage)
Interior Side Yard Setback	1.2m – end unit 0m – btwn	Clarification on exterior yard requirements would be helpful.
Rear Yard Setback	7.5m	7.0 m

Notes:

Suggest a lower minimum lot frontage to accommodate a greater range of unit sizes. Front yard setback revisions proposed to be consistent across all zones.

Residential One (R1) – Multiple:

Regulation	Requirement	Suggestion
Min. Lot Frontage	15.0m (49 feet)	12.2m (40 feet) This would provide for modest infilling opportunities on large lots.
Building Height	3 storeys / 10.5m	No change
Front Yard Setback	6.0m	3.0m (dwelling), 6.0m (garage)
Interior Side Yard Setback	1.2m	1.2m on one side, 0.6m on other side to provide for modest infill opportunities.
Exterior Side Yard Setback	No regulation noted	Clarification on exterior yard requirements would be helpful.
Rear Yard Setback	7.5m	7.0 m 0 m for back-to-back units
Minimum common amenity area	15 m ² per dwelling unit (1)(2) (1) Not required if less than 24 units provided	8 m ² amenity area per dwelling unit, including 4 m ²

	(2) Common amenity area aggregated into area not less than 360 m ²	common amenity area per dwelling unit (1)
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Notes:

Suggest a lower minimum lot frontage to accommodate a greater range of lot sizes. Front yard and interior side yard setback revisions proposed to be consistent across all zones.

As noted earlier, we suggest a lower common amenity area and revise the requirement to include private amenity area. Further, common amenity area aggregation requirement as written requires **all** such area for a 24-unit building be aggregated in one location. This is highly impractical. We would suggest no more than 50% of required common amenity area be aggregated or 360 m², whichever is less.

Residential Two (R2) – Detached

Regulation	Requirement	Suggestion
Min. Lot Frontage	9.0m	No Change
Building Height	4 storeys / 14m	No Change
Front Yard Setback	3.0m	No Change
Front Yard Setback to Garage	6.0m	No Change
Interior Side Yard Setback	1.2m on one side, 0.6m on other side	No Change Clarification on exterior yard requirements would be helpful
Rear Yard Setback	7.5m	7.0 m

Residential Two (R2) – Attached

Regulation	Requirement	Suggestion
Min. Lot Frontage	5.5 m	5.0 m
Building Height	4 storeys / 14.0 m	No Change
Front Yard Setback	3.0m	No Change
Front Yard Setback to Garage	6.0m	No Change
Interior Side Yard Setback	1.2m on one side, 0.6m on other side	No Change Clarification on exterior yard requirements would be helpful
Rear Yard Setback	7.5m	7.0 m

Notes:

Suggest a lower minimum lot frontage to accommodate a greater range of unit sizes.

We understand back-to-back townhomes are permitted within the R2 Attached, it's unclear how these regulations would apply to freehold back-to-backs (for example there would have to be a 0 metre rear yard requirement).

Residential Two (R2) – Multiple

Regulation	Requirement	Suggestion
Min. Lot Frontage	12.0 m	No Change
Building Height	4 storeys / 14.0 m	No Change
Front Yard Setback	3.0m	No Change
Interior Side Yard Setback	1.2m	No Change
		Clarification on exterior yard requirements would be helpful
Rear Yard Setback	7.5m	7.0 m 0 m for back-to-back units
Minimum common amenity area	15 m2 per dwelling unit (1)(2) (1) Not required if less than 24 units provided (2) Common amenity area aggregated into area not less than 360 m2	8 m2 amenity area per dwelling unit, including 4 m2 common amenity area per dwelling unit (1)

Notes:

It is unclear where this zone would apply. Multiple is defined as: Cluster townhouses (townhouses that are not on individual lots, such as rental townhouses or standard condominiums), stacked and back-to-back townhouses, apartment dwellings and other multi-unit housing.

As noted earlier, we suggest a lower common amenity area and revise the requirement to include private amenity area. Further, common amenity area aggregation requirement as written requires **all** such area for a 24-unit building be aggregated in one location. This is highly impractical. We would suggest no more than 50% of required common amenity area be aggregated or 360 m2, whichever is less.

We understand back-to-back townhomes are permitted within the R2 Multiple Dwelling Type, it's unclear how these regulations would apply to freehold back-to-backs (for example there would have to be a 0 metre rear yard requirement).

Residential Three (R3) – Multiple (HIGH DENSITY – TALL BUILDINGS)

Regulation	Requirement	Suggestion
Min. Lot Frontage	30.0 m	No Change
Front Yard Setback	4.5 m	No Change
Interior Side Yard Setback	3.0 m	No Change
		Clarification on exterior yard requirements would be helpful
Rear Yard Setback	7.5 m	No Change

Building Height (Local Road)	5 storeys / 17.0m	8 storeys
Building Height (Collector/Arterial Road)	15 storeys / 52.0 m	25 storeys
Min. Height of building podium	3 storeys (in buildings over 5 storeys)	No Change
Max. Height of building podium	6 storeys (in buildings over 5 storeys)	No Change
Min. step-back of building from edge of podium facing the street above 6 storeys	3.0m	No Change
Minimum separation distance between portions of buildings higher than 6 storeys	25.0m	<p>As written 7 storey buildings would need to be 25 metres apart, which seems excessive for mid-rise.</p> <p>Consider only apply minimum separation to 15-25 storey buildings and consider less than 25 metres between buildings on the same site. 25 metres is appropriate for much higher towers but excessive for the heights being contemplated.</p>
Maximum floor area of any storey above 6 storeys	750.0 sq. m	<p>750 square metres is a small point tower that is more appropriate for towers well in excess of the heights the City is contemplating (ie 30+ storey point towers).</p> <p>The max floor area should be much larger and can taper as building height increases.</p> <p>For mid-rise buildings (7-9 storeys) upper storeys are likely the same footprint as the lower storeys, with a stepback from the street. The resultant-built form from this regulation on a mid-rise building is a concern.</p> <p>As an example, consider the City of Kitchener regulations:</p>

		<p>SGA 2 – 2000 sqm – 8 storeys</p> <p>SGA 3/4 – 1200 sqm – 13-18 storeys</p> <p>SGA 3/4 – 900 sqm – 19-36 storeys</p> <p>SGA 3/4 – 850 sqm – over 36 storeys</p>
Minimum common amenity area	<p>15 m2 per dwelling unit (1)(2)</p> <p>(1) Not required if less than 24 units provided</p> <p>(2) Common amenity area aggregated into area not less than 360 m2</p>	<p>8 m2 amenity area per dwelling unit, including 4 m2 common amenity area per dwelling unit (1)</p>

Notes:

Proposed Tall Building regulations are not supportive of “typical” mid-rise forms of housing that may take the form of 8-storey apartments. Requiring a ‘point-tower’ above 6 metres is not supportive of mid-rise development.

We would encourage the City to test these regulations against recently approved intensification projects (supported by Staff) to determine if any of the projects could have been built under these regulations.

As noted earlier, we suggest a lower common amenity area and revise the requirement to include private amenity area. Further, common amenity area aggregation requirement as written requires **all** such area for a 24-unit building be aggregated in one location. This is highly impractical. We would suggest no more than 50% of required common amenity area be aggregated or 360 m2, whichever is less.

Closing

We appreciate the City’s willingness to work with the Homebuilder Liaison Committee and look forward to discussing the content of this letter at Liaison the City’s convenience.

Yours truly,

WRHBA, Cambridge Liaison Committee



June 6, 2025

Bryan Cooper, Senior Planner
Planning Division
Cambridge City Hall
50 Dickson Street, 3rd Floor
Cambridge, ON N1R 8S1

cooperb@cambridge.ca

Dear B. Cooper:

**RE: CITY OF CAMBRIDGE, DRAFT ZONING BY-LAW (APRIL 2025)
150 HOLIDAY INN DRIVE
OUR FILE 16307U
CITY FILE No: D24**

On behalf of our client, Plaza Retail REIT, MHBC has reviewed the proposed City of Cambridge draft Zoning By-law (April, 2025) as it pertains to the lands located at 150 Holiday Inn Drive (the 'Subject Lands'). This letter provides an overview of the Subject Property and the applicable City of Cambridge Official Plan policies and current Zoning By-law 150-85 regulations to establish the context for our comments and recommendations regarding the draft Zoning By-law. This is followed by a list of recommended amendments to improve interpretation and development implementation.

SUBJECT PROPERTY: CONTEXT & ASSESSMENT

Site Context

The Subject Lands are located south of Speed River on a parcel northeast of the interchange of Highway 401 and Hespeler Road (Figure 1). The lands occupy a collective area of 7.9 hectares with approximately 150 m of frontage along Groh Avenue. The Subject Lands are bound by Hespeler Road to the west, Groh Avenue to the north, Holiday Inn Drive to the east and a parcel of land that accommodates commercial land uses to the south. Currently, the Subject Lands contain commercial retail uses and is characterized by 1-2 storey buildings and related at grade parking areas. The Subject Lands are located within the Holiday Inn Drive Community Node and are envisioned to one day accommodate higher density residential uses.



Figure 1: Subject Lands

City of Cambridge Official Plan

Within the City of Cambridge Official Plan, the Subject Lands are within both the 'Built-Up Area' of the city and within a 'Community Node' (Queen St, Goebel Ave & Holiday Inn Dr). Intensification is encouraged throughout the built-up area, particularly within nodes, and is intended to attract a significant portion of future employment and population growth.

According to the policies of section 8.7.2.c, the Queen St, Goebel Ave & Holiday Inn Dr Community Node is a gateway site, intended to develop into a medium to high-density mixed-use centre. The Subject Lands are also designated as 'Community Commercial'. Section 8.6.1.2.1 indicates that this designation applies to commercial developments with a maximum gross leasable area of 42,000 m². The planned function is to provide a range of retail, specialty shopping, and service uses that serve the needs of residents.

Zoning By-law 150-85

The Subject Lands are currently zoned 'Commercial Shopping Centre Use Class 3 (CS3)', with site specific provision s.4.1.123.1 in the City of Cambridge Zoning By-law No. 150-85. This site-specific provision indicates, in part, that the lands:

shall not have a maximum gross leasable commercial floor area greater than 23,760 m² and the provisions of the definition requiring single ownership of a shopping centre as defined, shall not apply.

The CS3 zone also identifies that the 'shopping centre' permitted on the Subject Lands is a 'community shopping centre'. Within the CS3 zone, and within the community shopping centre, permitted uses include retail commercial establishments, service commercial establishments, commercial recreational establishments, and community shopping centre. Within this CS3 zone, s.3.3.3.1.a, limits the Gross Leasable Commercial Floor Area ('GLCFA') of retail commercial establishments, such as neighbourhood grocery, neighbourhood variety and retail commercial establishments, to be not more than 300 m² of GLCFA.

A regulation that is applicable to all Commercial Use zones permits 'Outside Display' in proximity to the front façade of a principal building and is applicable to the Subject Lands. Outside Display includes uses, such as outdoor garden centres and motor vehicle sales establishments.

DRAFT ZONING BY-LAW (APRIL, 2025)

In the most recent Draft Zoning By-law (April, 2025) the Subject Lands are zoned 'Community Commercial 2 - CC2'.

Under the current Zoning By-law 150-85 ('ZB 150-85') the Subject Lands have a site-specific provision regarding a maximum GLCFA for retail commercial establishments and that single ownership of the shopping centre shall not apply. These site-specific provisions have been deleted within the draft Zoning By-law ('draft ZB') through Part 14.0 – Exceptions (i.e. s.14.1.123 Removed).

In its place, the CC2 zone has removed maximum GLCFAs for the commercial retail establishments and replaced it with a general requirement of a maximum GLFA of 42,000 m² irrespective of use. Regarding single ownership, the proposed definition of shopping centre will apply:

Shopping Centre: a commercial development, containing at least three individual business establishments, designed as a single, comprehensively planned development project with relationships between the shopping centre buildings, activities, open spaces, parking areas, loading areas, driveways, other shared facilities, public areas and adjoining streets, and held in single ownership or by participants in a condominium corporation or commercial cooperative.

We ask that the site-specific exemption regarding single ownership be reinstated.

Definitions

In Part 3.0: Definitions of the draft ZB, the above noted definition of 'shopping centre' has been transcribed from the ZB 150-85 with slight modifications. The draft ZB no longer provides definitions for sub-categories of shopping centres, such as the 'shopping centre, community' use which had identified a GLCFA range for such shopping centres. The draft ZB now provides an overall maximum GLFA of 42,000 m² under the applicable CC2 zone standards.

The draft ZB does not provide a definition of grocery store, food store or any similar reference to the selling of food stuffs. We ask for confirmation that a grocery store, as a commercial use, may be captured under the term 'retail store.' This is newly defined as follows in Part 3.0:

Retail store: an establishment in which goods, wares, merchandise, substances, articles or things are displayed, rented or sold directly to the public but does not include any use otherwise defined by this By-law.

Permitted Uses

The following chart compares the current, in effect and permitted commercial uses to the proposed Draft permitted uses in the CC2 zone. These are noted by green shading.

Comparison Chart: Permitted Uses – Current ZB 150-85 vs Proposed Draft ZB		
Uses	ZB 150-85 CS3 zone	Draft ZB (April 2025) CC2 zone
Adult/Continuing Education		

Comparison Chart: Permitted Uses – Current ZB 150-85 vs Proposed Draft ZB		
Uses	ZB 150-85 CS3 zone	Draft ZB (April 2025) CC2 zone
Animal Clinic		
Arcade, within enclosed shopping mall		
Art Gallery		
Business Office		
Business Service Use		
Caterer's Establishment		
Child Care Centre		
Commercial Fitness Centre		
Commercial Recreational Use, Private		
Commercial School		
Community Shopping Centre		
Drive-through Service Use		
Dry-Cleaning Establishment		
Elementary School		
Financial Institution		
Food Truck		
Funeral Home		
Gas Bar		
Grocery Store, neighbourhood		
Home Improvement Centre		
Hotel		
Medical Office		
Micro-brewery/winery/distillery		
Motel		
Outside Display (Outdoor Display & Sales Area)		
Personal Service Use		
Place of Amusement		
Places of Worship		
Private Club		
Private School		
Public Hall		
Recreation Centre		
Restaurant		
Retail Commercial Establishment		
Retail Store		
Secondary School		
Service & Repair Establishment		
Community Shopping Centre		
Shopping Centre		
Theatre		
Temporary Farmers Market		
Variety Store, neighbourhood		

In both the current ZB 150-85 and the draft ZB, the above permitted uses are allowed within a 'shopping centre' development. As noted above, there is no explicit mention of a grocery store as a permitted use within the CC2 zone of the draft ZB. Again, we request clarification that a grocery store will be interpreted as a retail store.

Given the Official Plan direction to have this area develop into a Community Node, which will support medium to high-density mixed-use, we are surprised to see that residential uses are not listed as permitted uses. We request residential permissions be added to the list of permitted uses within the CC2 Zone.

Zone Standards

While the majority of the Commercial Zone Standards are comparable between the current ZB 150-85 and the draft ZB, it is noted that the maximum building height of 19.0 m is a new additional regulation within the CC2 zone, as is the maximum GLFA of 42,000 m² and maximum front yard setback for buildings less than 400m².

Given the intent to develop this area into a medium to high-density mixed-use centre, height and parking provisions should be adjusted accordingly.

As the Subject Lands have been developed with multiple commercial buildings, it would be pertinent to ensure the existing permissions on the property are maintained to reduce any unnecessary variances in the future. As such, the provision related to front yard maximum for buildings which have a gross leasable floor area of less than 400m² should be revised. Specifically, the existing Tim Hortons, KFC and Wendys buildings have a gross leasable floor area of 267 m², 235 m² and 219 m² respectively. However, these buildings are 14.3m, 12.6m and 17.4m from the property line. Any future works on this site would trigger the requirement for a minor variance.

PROPOSED AMENDMENTS

The following represents our recommendations to amend several regulations contained within the proposed CC2 zone for the Subject Lands:

Permitted Uses

- Confirm that a 'Grocery and/or Supermarket Store' will be interpreted as a 'Retail Store';
- Add 'High Density Residential' as a permitted use within the CC2 zone under Table 8.2.1: Permitted Uses in Commercial Zones, to bring the zoning into conformity with the Official Plan, sections 8.7.2.2.b and 8.7.2.c.2;

Definitions

- Delete reference to land ownership in last sentence of the definition of Shopping Centre maintaining current permissions through site specific exception 4.1.123.1:
Shopping centre: a commercial development, containing at least three individual business establishments, designed as a single, comprehensively planned development project with relationships between the shopping centre buildings, activities, open spaces, parking areas, loading areas, driveways, other shared facilities, public areas and adjoining streets, and held in single ownership or by participants in a condominium corporation or commercial cooperative

Parking Standards

- Delete minimum parking standards for the CC2 zone district to bring parking space regulations into conformity with the Official Plan s.8.7.2.4 that speaks to density and mix of uses that support transit.

CC2 Zone Standards

- Delete the phrase, "As legally existing on effective date of Zoning By-law" for the CC2 zone under numbers 1 and 2 of Table 8.2.2: Standards for the Commercial Zones, for both the minimum required lot frontage and minimum required lot area;

- Replace numbers 1 and 2 of Table 8.2.2 with "30 m" for minimum lot frontage and '0.3 ha' for minimum lot area to permit opportunities for lot reconfiguration and/or redevelopment;
- Increase building height from 19 m to, at minimum, 36 to 40 m to reflect the Official Plan, Community Nodes, s. 8.7.2.6.b that permits a maximum building height of 12 storeys;
- Include site specific requirements for maximum front yard setback.

CONCLUSION

We appreciate the opportunity to provide our comments regarding the City of Cambridge draft Zoning By-law. Should you wish to discuss our recommended amendments, we would be pleased to meet with you.

Yours truly,

MHBC



Katherine Rauscher, MCIP, RPP
Associate



28 May 2025

City of Cambridge
Planning Division
60 Dickson Street
Cambridge ON N1R 8N1

Sent via Email: Bryan Cooper – Senior Planner
cooperb@cambridge.ca

Dear Mr. Cooper,

**Re: Comments from Build Waterloo Region (Region of Waterloo)
City of Cambridge New Comprehensive Zoning By-law**

The Region of Waterloo provides this letter in its role as a landowner in response to the public exhibition of the City of Cambridge Comprehensive Zoning By-law update.

The Region’s Build Waterloo Region team has examined the draft zoning maps with reference to regionally-owned sites, noting the Preston, Galt and Hespeler centres have been deferred from the updated zoning. The Build Waterloo Region team kindly requests clarification and consideration of the points enclosed.

The Build Waterloo Region team welcomes the form-based residential zoning that guides the new Comprehensive Zoning By-law. The focus on supporting residential growth to achieve housing with a more simplified zoning and permissible land use approach is commendable. This letter seeks to provide a summary of Regionally-owned properties that are affected by the updated zoning, to confirm the intent and impacts of the changes upon future development on these lands.

The Region-owned properties that would be affected by the proposed draft zoning we wish to raise are detailed in the following table, including their existing use, existing zoning and proposed zoning:

Site Address	Current Use	Current Zoning bylaw 150-85	Proposed New Comprehensive Zoning By-law
30 Lauris Avenue, Cambridge	Vacant/Future Affordable Housing/Child Care Development	(H)N1RM3 zone - S.4.1.463 Site specific provision applied for max. density of 112 units, min. unit size of 48.7m ² , setback control to driveways, and 0.81 parking spaces per unit. Holding provision for an acoustic study also imposed.	R2(1.463) zone – Max. 4 storeys/14m Site specific provision applied for max. density of 112 units, min. unit size of 48.7m ² , setback control to driveways, and 0.81 parking spaces per unit. Holding provision for an acoustic study also imposed.
95 & 97 Elgin Street N, Cambridge	Vacant/Future Dwelling	N1R4 zone	I zone
36 Lauris Avenue, Cambridge	Vacant/Future Dwelling	N1R4 zone	I/R1 Zone



355 Main Street, Cambridge	Future Road Works	R4 zone	R1 zone
310 Dundas Street S, Cambridge	Vacant	C2 zone – S.4.1.43 Site specific provision for use as a milk transport depot	R2 zone – S1.467 Site specific provision 14.1.467 applies a site-specific provision to land within the R3 zone and does not appear to apply to the site, which is proposed to be within the R2 zone.
191 Pinebush Road, Cambridge	Water Services	M3 zone	Note – updated zoning not identified on zoning map
720 Saginaw Parkway, Cambridge	Water Services	OS4 zone	EP zone
266 St Andrews Street, Cambridge	Water Services	RM3 zone	R2, EP zones
99 Beechwood Road, Cambridge	Child Care	N1R5 zone	I zone
30 Christopher Drive, Cambridge	Child Care	N2 zone	I zone
91 St Andrews Street, Cambridge	Paramedic Services	N1 zone	I zone

The proposed rezoning, and in particular the form-based residential zoning approach, as it applies to Region-owned properties is generally supported. Notwithstanding, our review of the new Comprehensive Zoning By-law has raised some site-specific matters, and we seek the City’s consideration for alterations to the proposed draft zoning to address these concerns.

We thank the City of Cambridge for the opportunity to provide comment, and summarise our request for site-specific considerations as follows:

Site Specific Matters

1. **30 Lauris Avenue** currently contains an undeveloped vacant parcel of land with a large street frontage to the east to Lauris Avenue and access handle from Elgin Street North to the west. The adjacent properties at 95 Elgin Street North and 36 Lauris Avenue were recently severed from the broader 30 Lauris Avenue site and sold to private developers for funds to support affordable housing development projects. 97 Elgin Street North was also recently severed and is anticipated to be sold once servicing infrastructure is installed to service 30 Lauris Avenue.

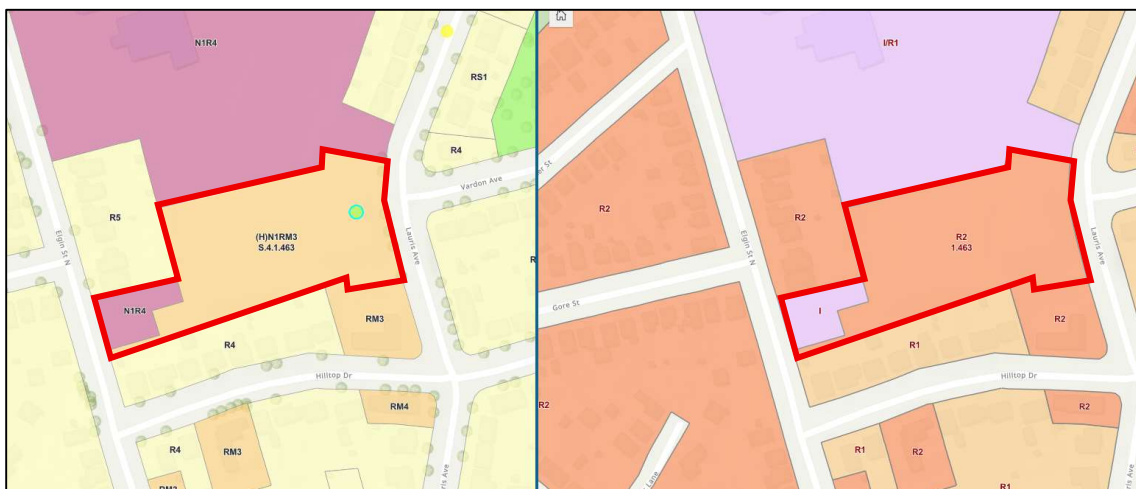


The site has been the subject of a Request for Proposal prepared by the Build Waterloo Region team, with a conditional award granted to a development partner for the site. As part of preparation for development through partnership with the Build Waterloo Region team, the site was subject to an Official Plan and Zoning By-law amendment applications approved on December 27, 2023. The OPA and ZBA approvals for the site included:

- Official Plan special policy to permit increased residential densities on the site up to 112 dwelling units per hectare,
- Change to zoning N1R4 > N1RM3 to permit apartment use, and
- Changes to zoning by-law to permit site-specific density, reduced parking rates, reduced minimum gross floor area for one-bedroom units, and changes to setbacks.

The envisioned development for the site is for a six-storey apartment building containing affordable housing as well as market units, with at-grade parking and a detached childcare centre on the site. The R2 zoning indicated for the land as part of the Zoning By-law update will present a maximum permitted height of 4 storeys/14 m which would impact upon the envisioned form of development for the site. Whilst a site-specific provision 14.1.463 is proposed consistent with a previous provision which applied to the site, we seek that the site specific clause also confirm that no maximum building height applies to the land given a maximum density of 112 units per hectare is imposed.

The zoning update seeks to zone the land *R2 – Residential Two*, with Region-owned parcels fronting Elgin Street North to be zoned *I – Institutional*. Whilst it is noted the site previously included Institutional zoning on both the Elgin Street North frontage and broader site, the Institutional zoning proposed for the Elgin Street properties will impact upon the development potential of these properties in the future to accommodate lower density housing types.

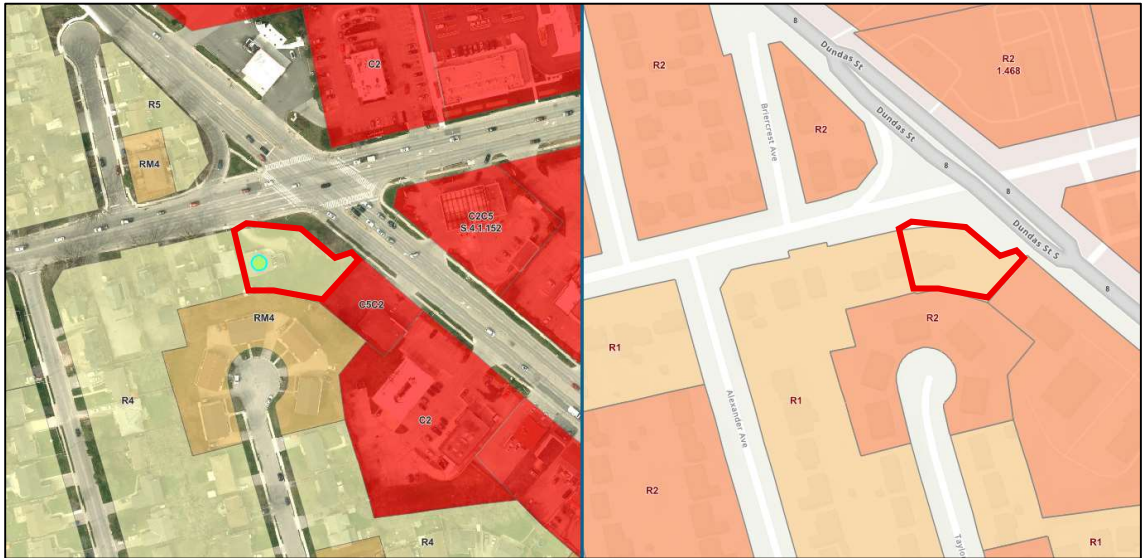


Comment: The BWR Team seeks confirmation that the site-specific provision for 30 Laurier Avenue, Cambridge does not impose a height restriction upon development currently being contemplated for the site of 6 storeys which has been subject of a Request-for-Proposal process and conditionally awarded to a development partner.



Further, we suggest that the properties at 95 & 97 Elgin Street North and 36 Lauris Avenue retain a residential zoning consistent with that of the broader Lauris Avenue development site, to preserve the future development potential of these properties for lower density housing. An R2 – Residential Two zoning would be appropriate for the sites facing Elgin Street North, with an R1 – Residential One zoning for 36 Lauris Avenue, consistent with the adjoining dwellings to these properties.

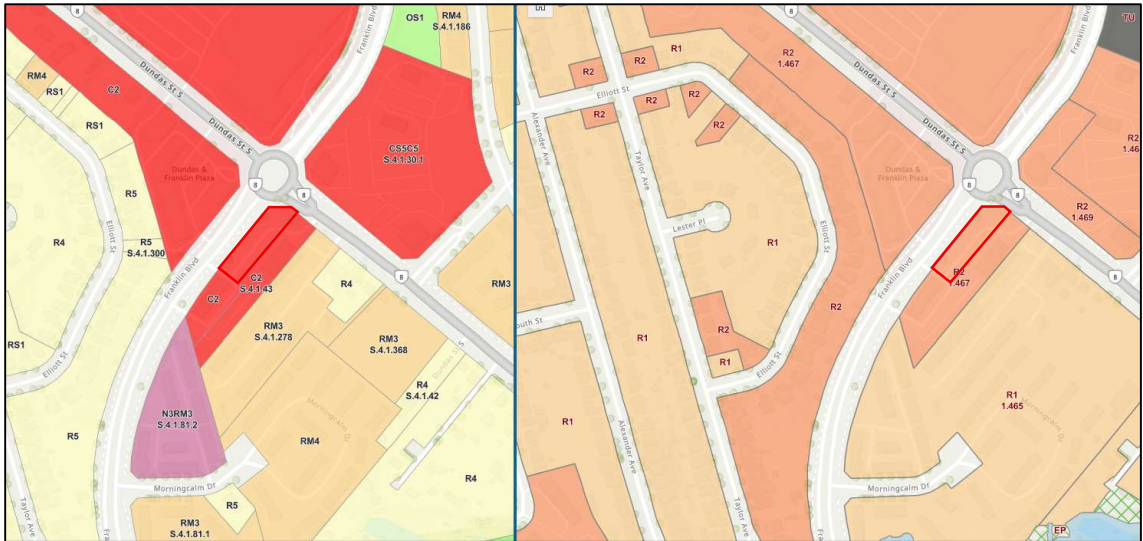
- 2. 355 Main Street** is a Region-owned parcel at the southern corner of the intersection of Main Street and Dundas Street South and currently contains a single detached dwelling. The site is proposed to be zoned R1 – Residential One, and adjoins R2 – Residential Two zoned land to the south and west.



Comment: The prominent location of this site and its proximity to higher-zoned land to the south and west is conducive to a higher residential density, being a corner site that could comfortably absorb development heights up to 4 storeys/14m, with potential for transitional heights to be provided to the adjoining property to the west via a site-specific provision.

- 3. 310 Dundas Street South** is a Region-owned property currently zoned C2 with a site-specific provision under the Cambridge Zoning By-law 150-85. The proposed zoning of this land is R2 – Residential Two with a site-specific provision 14.1.467.

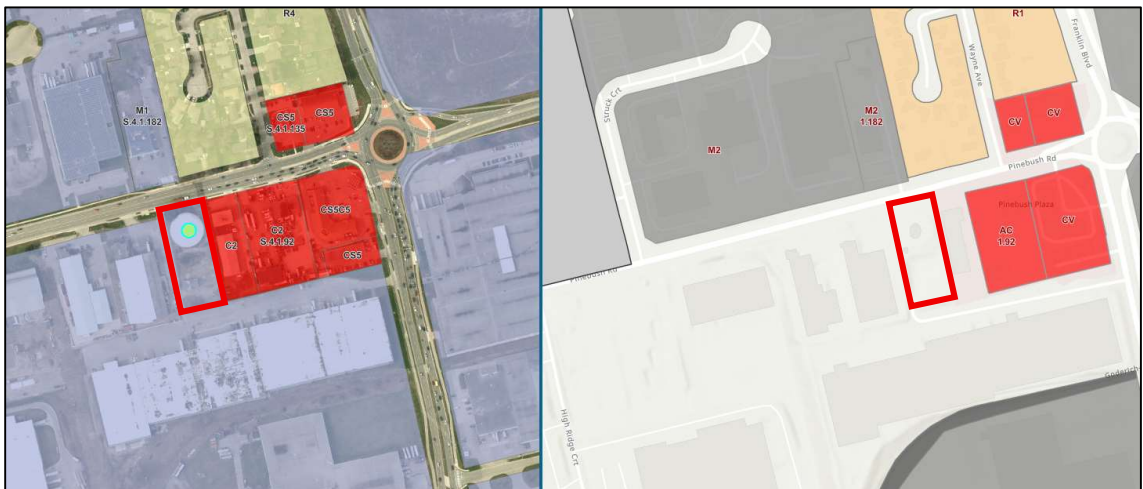
Pursuant to our review of the Comprehensive Zoning By-law, this site-specific provision makes reference to R3 – Residential Three zoned land, labelled 14.1.467: Main/Dundas Mixed-Use Main Street (R3 Zone) which permits commercial uses up to 2,000m² at the ground floor level. The zoning of the site at 310 Dundas Street South of R2 – Residential Two appears to be inconsistent with the labelled site-specific provision for the site in this regard.



This site is subject to the *Main and Dundas Secondary Plan* which identifies the site within the 'Mixed Use Main Street' land use category. The permitted uses within this category include a range of residential, commercial, and office uses with a maximum permitted height of 6 storeys pursuant to the Secondary Plan.

Comment: Confirmation is sought regarding the proposed zoning of 310 Dundas Street South, consistency with the *Main and Dundas Street Secondary Plan*, and the applicability of the site-specific provision 14.1.467 to the land.

- 4. 191 Pinebush Road** is a Region-owned Water Services site currently zoned M3 – Industrial Zone. The proposed Comprehensive Zoning By-Law mapping does not identify an updated zoning for this site as depicted in the below map extract.



Comment: An updated zoning should be reflected for this land.

- 5. 720 Saginaw Parkway** is a Region-owned Water Services site currently zoned OS4 – Open Space Zone. The proposed Comprehensive Zoning By-Law mapping identifies an updated EP – Environmental Protection zoning for this land.



Comment: Section 4.25.1 *Public Uses* of the Comprehensive Zoning By-Law states that public uses are permitted in all zones. We seek to confirm future development related to Region Water Services will continue to be permitted as a public use regardless of the *EP – Environmental Protection* zoning.

6. **99 Beechwood Road** this Region-owned property contains an operating childcare centre, currently zoned *N1R5 – Institutional and Residential zones*. The proposed Comprehensive Zoning By-Law mapping identifies an updated *I – Institutional* zoning for this land.

Comment: Given the historic use of the site as a childcare centre operated by the Region of Waterloo, a continued split zoning of *I / R2 – Institutional Residential Two* would serve to permit various forms of development that would be compatible with the form and scale of development envisioned for the R2 zone adjoining the site to the north and east.

7. **30 Christopher Drive** this Region-owned property contains a childcare centre, currently zoned *N2 – Institutional zone*. The proposed Comprehensive Zoning By-Law mapping identifies an updated *I – Institutional* zoning for this land.

Comment: We seek that a split zoning is applied to the land of *I / R2 – Institutional Residential Two* which would continue to permit various forms of development that would be compatible with the form and scale of development envisioned for the R2 zone adjoining the site to the west.

8. **91 St Andrews Street** is a Region-owned Paramedic Services site currently zoned *N1 – Institutional Zone*. The proposed Comprehensive Zoning By-Law mapping identifies an updated *I – Institutional* zoning for this land.

Comment: The site is adjoined to the east and west by *R1 and R2 – Residential One and Two* zoned land. A split zoning for the site of *I / R2 – Institutional Residential Two* is sought for the site which would allow for future increased densities on the site consistent with the surrounding locality as part of any future Paramedic Services development.



Conclusion

We trust the above provides a summary of the relevant planning changes that will apply to Region-owned properties within the Cambridge Municipal boundary and would appreciate the opportunity to discuss the above matters with City of Cambridge staff as the Updated Zoning By-law is finalised.

We look forward to meeting with City staff to continue to discuss the above comments as they relate to Regional properties, and work together on a vision for these properties.

We thank you for your time and consideration with these comments.

Yours truly,

Jason Lambropoulos

Senior Development Planner, MSc Spatial Planning, BPlan
Build Waterloo Region (Region of Waterloo)

cc.

Rod Regier, Commissioner PDLs

Danielle De Fields, Director of Regional Growth, Development and Sustainability Services

Matthew Chandy, Director Build Waterloo Region

Ryan Pettipiere, Director of Housing Services

Jeffrey Schumacher, Manager Affordable Housing Development

Adolfo Plaza, Manager Real Estate Services

Matthew O'Neill, Manager Rapid Transit Coordination

John Lubczynski, Senior Planner Regional Growth, Development and Sustainability Services

Ashley Graham, Senior Development Planner, Build Waterloo Region

Yuri Langlois, Supervisor Urban Design, Build Waterloo Region

Josh Graham, Associate Director, Build Waterloo Region



SHAPING GREAT COMMUNITIES

June 17, 2025

File No. 24172

City of Cambridge
Planning Division, 3rd Floor
50 Dickson Street
PO Box 669
Cambridge, ON N1R 5W8

Attention: Bryan Cooper, MCIP, RPP
Senior Planner

Dear Mr. Cooper:

**Re: New City of Cambridge Zoning By-law – April 2025 DRAFT
Waterloo Region District School Board & Waterloo Catholic District School Board**

On behalf of the Waterloo Region District School Board (WRDSB) and Waterloo Catholic District School Board (WCDSB) (herein collectively referred to as “the Boards”), we are pleased to submit the following commentary as it relates to the new City of Cambridge Zoning By-law currently being updated by the City. The following commentary is based on our review of the draft Zoning By-law dated April 2025 (herein referred to as “April 2025 Draft By-law”); please note that key requests and/or recommendations of the Boards have been noted in bold text for ease of review.

The WRDSB and WCDSB oversee a comprehensive network of school facilities throughout the City of Cambridge (the “City”). The WRDSB currently operates 25 elementary schools (ranging from JK-6, JK-8 and 7-8) which accommodate seven (7) child care facilities, four (4) high schools (secondary schools), one (1) site for alternative secondary education and one (1) outdoor education centre in the City. In addition, the WRDSB has one (1) new elementary school with a childcare centre under construction, and three-to-four (3-4) future elementary schools proposed.

The WCDSB currently operates 14 elementary schools (JK-8) which accommodate 6 child care centres and 2 City-affiliated neighbourhood groups, two (2) high schools (secondary schools) and one (1) site for alternative secondary education, with one (1) new elementary school under construction and two (2) future elementary schools proposed. In addition, the WCDSB has one (1) closed school being used for other purposes. WCDSB facilities also include six (6) co-located child care centers, two (2) City-affiliated neighbourhood associations and one (1) public library.

As both Boards continue to experience steady growth in student enrolment, they focus on appropriate long-range planning to efficiently accommodate facility expansions and/or renovations and new facility construction.

The most recent Provincial Planning Statement (2024) states that Planning authorities should support the achievement of complete communities by accommodating an appropriate range and mix

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of land uses, housing options, transportation options, employment, public service facilities and other institutional uses (including schools and associated child care facilities), recreation, parks and open space uses. The provision of an adequate number of school sites is a pivotal component of a complete community; the use of lands for publicly-funded schools should be included or contemplated as a permitted use in multiple zones as part of the new comprehensive Zoning By-law.

More recently, the enactment of Ontario Bill 17 (Protecting Ontario by Building Faster and Smarter Act, 2025) included changes to the *Ontario Planning Act* that restrict a municipality's ability to prohibit the use an urban residential parcel of land for an elementary school, secondary school and/or any use ancillary to such schools. These changes further enhance the ability for all lands within an urban area to be used for publicly-funded schools; it reconfirms the importance of schools as part of a complete community.

Under the existing Zoning By-law 150-85, most school sites throughout the City are zoned Institutional (N1) or dual zoned Institutional/Residential (N1/R4). Permitted uses in the Institutional (N1) Zone of Zoning By-law include universities, colleges or private schools, elementary or secondary schools of the Boards, and child care centres. Permitted uses in the Residential (R4) Zone include single detached dwellings, a residential care facility and accessory uses.

Under the April 2025 Draft By-law, most school sites are proposed to be zoned Institutional (I) or dual zone Institutional/Residential (I/R1). Permitted uses proposed to be included in the Institutional (I) Zone includes adult or continuing education, child care centres, post-secondary schools, elementary schools, public schools and secondary schools. Permitted uses proposed to be included in the Residential (R1) Zone include a broad range of residential dwelling types, including but not limited to single detached and semi-detached dwellings, townhouse dwellings, apartment dwellings, group homes, place of worship and retirement home. In addition, adult or continuing education schools, elementary schools and secondary schools are also proposed to be permitted in the Residential (R1) Zone. **The Boards are very supportive of the broadened range of uses permitted in the proposed Institutional (I) Zone as well as the additional institutional and education uses proposed to be permitted within the Residential (R1) Zone;** it will greatly enhance the opportunities for future school construction and streamline the associated planning approval process that may be required to facility such construction.

The Boards also support the continued use of dual zoning on school sites. The practice of dual zoning provides for the greatest flexibility as part of the future development of properties owned by the Boards, which from time to time includes the disposition and market sale of former school sites for redevelopment.

The existing Zoning By-law 150-85 includes the following parking requirements for institutional related uses:

- Day care centre – 2 spaces PLUS 1 space for each staff person
- Elementary school – 1 space per classroom

- Secondary school – 4 spaces per classroom plus parking prescribed for additional “place of assembly” uses
- No specified electrical vehicle or bike parking requirements

The April 2025 Draft By-law proposes the following parking requirements for institutional related uses:

- Child care centre – 1 space/ 25 square metres (net floor area)
- Elementary school – 1 space/100 square metres of gross educational floor area
- Private school - 1 space/100 square metres of gross educational floor area
- Secondary school - 1 space/100 square metres of gross educational floor area
- 20% of all required spaces must be electric for adult or continuing education centres, community centres, elementary schools and private schools (secondary schools not listed)
- Bike parking rates for elementary school and secondary schools noted as “Under Review”

The April 2025 Draft By-law is moving towards minimum parking requirements for institutional uses based on gross floor area, which is measurement typically associated with commercial or community uses. **The Boards do not support parking requirements based on gross floor area** as schools are operated and managed in a much different manner than commercial or community uses.

The following provides a comparison of parking requirements for the new joint WRDSB / WCDSB elementary school proposed for southeast Galt (Wesley Boulevard):

	By-law No. 150-85	April 2025 Draft By-law
School Parking	62 spaces	84 spaces
Childcare Parking	19 spaces	29 spaces
Electric Vehicle Parking	N/A	23 spaces
Bicycle Parking	N/A	TBD

As demonstrated above, moving towards a minimum parking requirement based on floor area will have a significant impact on the future design and development of school sites.

We request the City continue to use parking requirements for school and child care uses based on total number of classrooms, or alternatively, collaboratively explore an approach with the Boards to calculate parking on a net floor area basis to ensure consistency in parking requirements for school and child care uses, and discounts spaces not used for instructional purposes (i.e. mechanical rooms, washrooms, stairways and hallways).

We note that the April 2025 Draft By-law includes minimum parking requirements for electrical vehicles. We respect that that proposed requirements are noted as a portion of the minimum requirement and do not introduce additional parking space requirements. However, *Bill 17* notes that green building/design standards are to be grounded in the *Ontario Building Code* (OBC) and not in local planning instruments. The Boards notes the provision of electrical vehicle ready parking as part of the design and development of all future schools and/or school renovations will result in additional

cost considerations when seeking Provincial funding, which are not currently supported by the Province's school funding benchmark. Accordingly, we encourage the City to align their approach with *Bill 17* and defer such green building standards to the *Ontario Building Code*.

The Boards reserve the right to provide additional commentary related to proposed bicycle parking requirements upon review of future bicycle parking requirements for school and childcare uses.

We respectfully request to be included on all future correspondence related to the new City of Cambridge Comprehensive Zoning By-law on behalf of the Boards.

Thank you for providing us with the opportunity submit the above-noted comments. Please let us know if you have any questions or would like to discuss any of the comments in more detail.

Sincerely,
GSP Group Inc.

A handwritten signature in black ink that reads "Kristen Barisdale". The signature is written in a cursive, flowing style.

Kristen Barisdale, MCIP, RPP
Vice President, Planning

cc. Lauren Agar, WRDSB
Jennifer Passy, WCDSB

June 20, 2025

File No. 23096

City of Cambridge
 Community Development – Planning Services
 PO Box 669
 N1R 1S8

Attn: Bryan Cooper
 Senior Planner – Policy

Re: **Comments – New Comprehensive Zoning By-law
 8 Schofield Street (Ram Chandrer Holdings)**

On behalf of Ram Chandrer Holdings, GSP Group is pleased to provide the following comments regarding the City of Cambridge’s Draft new Comprehensive Zoning By-law (April 2025). Our comments pertain to our client’s property at 8 Schofield Street (“Site”). The Site is currently designated ‘Low/Medium Density Residential’ and ‘Regeneration Areas’ in the City of Cambridge Official Plan. The Site is currently zoned N1RM3 (Institutional/Residential) in the City of Cambridge Zoning By-law, which permits a wide variety of institutional and residential uses. In the City’s draft Comprehensive Zoning By-law (April 2025), the Site is proposed to be zoned ‘Institutional,’ which would remove the associated residential land use permissions currently applicable to the Site. An excerpt from the draft new Comprehensive Zoning By-law is provided in **Figure 2** below.

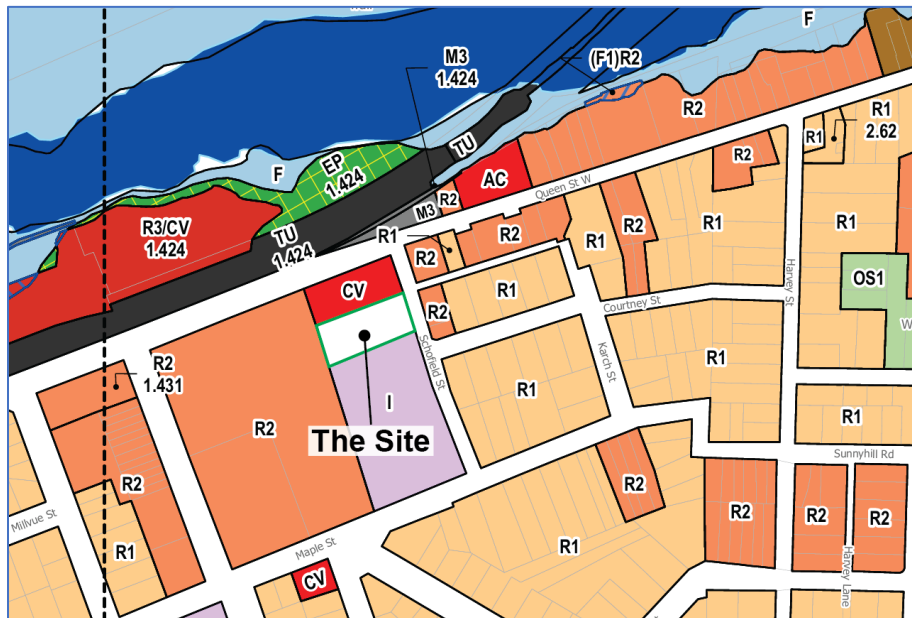


Figure 2 – Draft New Comprehensive Zoning By-law Schedule D12 Excerpt

It is our client's intention to develop the Site to include the construction of a multiple residential building. The Site is currently subject to active Official Plan and Zoning By-law Amendment applications (file OR04/24). These applications seek to add site-specific provisions to the existing designation and rezone the Site to 'Multiple Residential Three (RM3)' with site-specific provisions.

In response to the draft Comprehensive Zoning By-law, we submit the following comment:

- We are requesting that the Site be zoned 'Residential Two (R2)' in the new Comprehensive Zoning By-law to retain similar permission to the existing residential permissions on the Site. In addition to retaining existing residential permissions, the request is further supported by the following:
 - The Site was severed from the adjacent Royal Canadian Legion property in 2018 and was intended to be used for residential purposes at the time of severance, rather than institutional uses. There are no plans for institutional uses at 8 Schofield Street.
 - The surrounding neighbourhood has already been targeted for upzoning, with various properties adjacent to the Site being proposed to be zoned 'Residential Two (R2)', including the properties adjacent to the Site on the opposite side of Schofield Street, which indicates a clear policy direction toward residential uses along and adjacent to the Queen Street West corridor, including along Schofield Street.

This request to the Draft April 2025 Comprehensive Zoning By-law offers a balanced solution that addresses the need for contextually appropriate intensification, especially in Regeneration Areas, as well as the provision of other forms of housing at an appropriate scale within established built-up areas of the City of Cambridge.

I trust that the above additional commentary is sufficient for your review and consideration. Please do not hesitate to contact us if you have any questions or would like to discuss further.

Yours truly,

GSP Group Inc.



Richard Kelly-Ruetz, MCIP, RPP
Senior Planner

c.c. Amit Saini – Ram Chandrer Holdings Inc.



June 30, 2025

Brian Cooper
Senior Planner
City of Cambridge
50 Dickson Street
Cambridge, ON N1R 8S1

Dear Mr. Cooper:

**RE: City of Cambridge Draft Zoning By-law Review
April 2025 Draft – Comments
725-775 Main Street, City of Cambridge
OUR FILE 16233K**

We are writing on behalf of our client, Marsam Investments Inc., with respect to the above-noted land (the “subject lands”) that they own within the City of Cambridge. On behalf of our client, we have reviewed the City of Cambridge’s April 2025 draft of the Zoning By-law as it applies to our client’s lands. The purpose of this letter is to provide comments to the City on this draft of the Zoning By-law and its impacts on our client’s proposed development.

EXISTING PLANNING FRAMEWORK

Official Plan and Zoning By-law Amendment applications (OR08/22) for the subject lands were approved by Council on November 5th, 2024. The Official Plan Amendment had the effect of redesignating the lands from Low/Medium Density Residential to High Density Residential and Open Space System (to reflect the existing wetland feature on the site), while the Zoning By-law Amendment rezoned the subject lands from Residential - (H)R4 to Multiple Residential – (H)RM3.S.4.1.479 and Open Space – OS1 and OS4. The redesignation and rezoning of the subject lands supported a proposed development concept that has been extensively reviewed by City staff. The concept plan proposed a 10 storey apartment building and 4 stacked townhouse buildings that would provide a total of 233 residential units on this site. This concept plan is attached to this letter.

CITY OF CAMBRIDGE DRAFT ZONING BY-LAW

Upon reviewing the proposed zoning maps, we understand the residential portion of the subject lands are proposed to be zoned R3 1.479 in the Draft Zoning By-law. Upon our review, it appears that the site specific zoning regulations for the existing (H)RM3.S.4.1.479 zone are carried forward in their entirety in the proposed R3 1.479 zone. Notwithstanding, we do note that there are new zoning

regulations within the proposed R3 zoning that seek to implement additional restrictions for building designs with towers.

We also note that parking requirements have not changed from the existing 1.25 spaces per unit requirement (including visitor parking) for apartment buildings or multiple dwelling units.

Furthermore, the wetland portion of the lands appear to be proposed to be zoned R1 1.465 – we understand this to be a mapping error as the lands should be zoned in an Open Space “OS” zone. **We request that City staff amend the mapping to reflect the wetland within an Open Space zone.**

COMMENTS ON DRAFT ZONING BY-LAW

The proposed R3 zone now includes regulations which affect any proposed buildings that are over 6 storeys. Specifically, it introduces regulations to require a minimum and maximum podium height, as well as step-backs above the 6th storey podium for facades fronting a street, and a maximum floor area for any storey above the 6th storey.

The Zoning By-law Amendment that was approved for the subject lands was based on a development concept that would not comply with these additional building design regulations intended to apply to tall buildings. Notwithstanding that the proposed R3 zone allows for building heights of up to 15 storeys along an arterial road (such as Main Street), **we cannot be assured that a similar unit count can be achieved on this site if a tall building (above 6 storeys) is required to meet these additional regulations.**

The additional building design regulations (e.g. min/max podium height, step-backs above the 6th storey, and maximum floor area of 750 m² for storeys above 6th storey) are too onerous and would greatly limit the ability to construct the apartment building as proposed in the concept plan. A narrow apartment building design was necessary for this particular site due to the site configuration which eliminates a large central area that contains an existing wetland. **These proposed regulations would challenge the development concept that was extensively reviewed by City planning staff and supported by Council to implement the Zoning By-law Amendment.**

Should staff proceed with including these additional building design regulations, we request that staff also consider the **implementation of transition provisions** for this development. By providing a timeline that will allow the concept that was contemplated through the OPA/ZBA application to receive full site plan approval, the proposed development (that has been extensively reviewed) can be “grandfathered” in without needing to meet these new regulations that were not contemplated at the time of the applications.

Lastly, we note that the residential parking rate for multiple dwelling and apartment buildings has not been revised in the Draft Zoning By-law. **We ask that staff consider reducing the applicable residential parking rates, or providing a minimum/maximum range for parking requirements** to allow for greater flexibility in the building/site design for infill lots (particularly irregularly-shaped lots such as this one) as parking requirements are a major factor in building and site designs and overall project feasibility.

We appreciate the opportunity to provide comment on the proposed new City of Cambridge Zoning By-law (April 2025) as it applies to our client's lands and look forward to your response to our comments and requests outlined herein. Please do not hesitate to contact me with any questions or comments on this matter.

Yours truly,

MHBC



Pierre J. Chauvin, MA, MCIP, RPP
Partner



Luisa Vacondio, BES, MCIP, RPP
Senior Planner

cc. *Sam Celik, Marsam Investments Inc.*
Karin Steig-Drobig, City of Cambridge



July 4, 2025

Bryan Cooper
Senior Planner - Policy
Community Development - Planning Services
City of Cambridge
50 Dickson Street
Cambridge, ON N1R 5W8

Submitted via email to:

**Re: City of Cambridge Draft Comprehensive Zoning By-law (April 2025)
Build Urban Comments and Recommendations**

On behalf of our client, Build Urban, please accept this letter with respect to the City of Cambridge's Draft Comprehensive Zoning By-Law. UP Consulting Ltd. has been retained by Build Urban to review and provide comments and/or recommendations with respect to the Draft Zoning By-Law, dated April 2025, obtained through the "EngageWR" website for this initiative.

To provide some additional context of our client's work and objectives, Build Urban is a collection of urban developers who, through their projects, play a significant role in shaping the future urban landscape of Waterloo Region, as well as its economic prosperity. The group's members share a commitment to an active and progressive form of city building that includes residential, commercial and institutional land uses that are inclusive, healthy, sustainable and vibrant for the community.

Build Urban's goal is to be a consistent two-way communication channel between urban development stakeholders and all levels of government. They offer technical expertise to government committees, educate through thought leadership white papers, and constructively provide new and fresh perspectives in order to build partnerships in urban development.

As a general statement, Build Urban is generally supportive of the initiative of the City and the progressive vision and implementing regulatory framework for the Zoning By-law. The proposed regulatory changes will, by and large, support the context-appropriate infilling of areas across the City, while aiming to ensure appropriate development standards are applied and incorporated into new developments. We appreciate the overall direction of the Draft Zoning By-law, including the simplification and consolidation of zones. However, several provisions merit reconsideration to ensure alignment with best practices, facilitate intensification, and reduce unnecessary barriers to development.

The following provides an overview of our detailed review of the Draft Zoning By-law, with a focus on Core and Residential zoning provisions and other key areas affecting development feasibility. For the complete matrix of comments and proposed revisions, please refer to **Appendix A – Comment Matrix** attached to this Letter. The comments and/or recommendations outlined in the Appendix are focussed on ensuring flexible, context-sensitive regulations to accommodate infill development, reduce barriers to affordable housing, and support sustainable transportation. We

encourage the City to consider these recommendations as part of finalizing the new zoning framework prior to a decision of Council.

1. Residential Parking Requirements (5.8)

We have reviewed the proposed parking regulations included within the draft by-law. The Comment Matrix attached recommends lower base rates for residential uses – particularly in transit-supported areas – and visitor parking requirements to support affordable housing and compact growth objectives.

In our professional opinion, based on our experience supporting a range of affordable housing developments within the Region, lower parking rates are more appropriate for these forms of housing, especially when located in areas with strong access to public transit, active transportation networks, and essential services. Reduced parking standards help improve housing affordability by lowering construction and operating costs, making these developments more financially viable while aligning with broader provincial and municipal objectives around intensification, sustainability, and equitable access to housing.

We recommend the City consider precedent approaches adopted by other municipalities, such as the City of Waterloo’s exemption of parking requirements for ADUs located within close proximity to higher-order transit. This approach promotes intensification without mandating unnecessary parking supply, which is often underutilized in these contexts. Aligning Cambridge’s standards with best practices from comparable municipalities would represent a meaningful step toward achieving the Region’s and City’s goals around 15-minute neighbourhoods, climate resilience, and housing affordability.

2. Electric Vehicle (EV) Parking (5.12.A)

While we support the integration of EV infrastructure as part of long-term climate mitigation efforts, there is concern over the requirement that 20% of spaces include full EV charging stations, which exceeds the requirement of the Building Code. As an alternate, it is recommended that the City move towards an ‘EV-Ready’ approaches used by the City of Kitchener and Waterloo, which would accommodate future upgrades without costly upfront installation. This would better balance sustainability goals with housing affordability.

3. Residential Bicycle Parking Regulations (5.15)

There is general support for these drafted provisions, though there are practical concerns about the usability of long-term indoor storage and the rigid maximums for short-term bicycle parking. We recommend:

- Offering reductions in vehicle parking as an incentive for exceeding minimum bicycle requirements and allowing flexibility in location and design through the site plan process. This would be beneficial for constrained infill sites aiming to achieve “missing middle” housing. Permitting centralized short-term bike parking within a development block rather than per building.

4. Core Area Zone Standards (6.0)

The Core Mixed-Use (CMU) zones provide a strong foundation for compact urban development. However, we recommend:

- Increasing the maximum building heights and Floor Space Index (FSI) permissions in CMU3 zones to facilitate mid-rise infill.
- Allowing balconies to contribute toward amenity area requirements, consistent with the approach taken by the City of Kitchener and many other comparable municipalities.
- Reducing aggregation requirements for common amenity spaces to promote development feasibility and design flexibility.

These refinements would improve the viability of higher-density housing forms while maintaining livable and well-designed built form outcomes.

5. Amenity Area Requirements (6.5, 7.3C, 7.3D)

The prescribed minimum amenity area of 15 m² per unit is very high relative to standards in comparable municipalities. We recommend:

- Permitting private balconies and patios to contribute toward the total amenity area.
- Lowering the requirement to 4-6 m² per unit, with a balance between private and shared space.
- Modifying the aggregation rule so that no more than 50% of the required common amenity area must be located in a single space.

Towards the preparation of this correspondence, we have reviewed amenity space requirements of several Ontario municipalities compared to those set out in the Draft By-Law, which are summarized in the following table:

MUNICIPALITY	AMENITY SPACE REQUIREMENTS
CITY OF TORONTO	4.0 sq. m per dwelling unit (of which at least 2.0 sq. m is indoor amenity space; at least 40.0 sq. m (of the total) is outdoor amenity space in a location adjoining or directly accessible to the indoor amenity space; and no more than 25% of the outdoor component may be a green roof)
CITY OF MISSISSAUGA	5.6 sq. m per dwelling unit or 10% of the site area. 50% of the percentage of the total to be provided in one contiguous area.
CITY OF OTTAWA	6.0 sq. m per unit + 10% of GFA of unit. A minimum of 50% to be communal spaces.
CITY OF WATERLOO	3 sq. m per unit for one bedroom unit + 2 sq. m for each additional bedroom
CITY OF KITCHENER	5-6 q. m per unit within 'Growing Together' areas. By-law generally silent elsewhere.

In addition to the above, it is noted that several municipalities do not contain any minimum requirements for amenity space within their respective zoning by-laws including the Cities of

London, Milton and Oakville, representing a similar approach to that currently used by the City of Kitchener.

While Build Urban is supportive of providing high quality amenities within new developments, as currently proposed by the Draft By-Law, the amenity space requirements are quite onerous compared to other comparable municipalities who have embraced a more flexible approach to amenity areas.

6. Other Technical Comments

The following provides additional technical comments for various provisions of the Draft Zoning By-law:

- Clarify whether patios are excluded from landscaped open space or only private patios.
- Allow encroachments such as landings and stairs into side yards for multi-entry units.
- Refine reduced front yard provisions (Section 4.18) to avoid unintended restrictions where larger setbacks are common but not desired.
- Revisit minimum setbacks from railways and roads to align with Provincial/Federal guidelines and allow for vertical separation and crash wall solutions.

Conclusion

Our client is generally supportive of the City's initiative and the progressive vision and implementing regulatory framework for the Zoning By-law, and appreciative of the work of the City to advance these important projects.

We maintain that our comments and/or recommendations noted in this Letter, as well as those outlined in **Appendix A – Comment Matrix**, are appropriate, and we recommend that City Staff and the City's retained consultants consider these comments as the project advances. It is our opinion that the proposed requests are appropriate and represent good planning.

We trust that the information provided in this correspondence will be considered as the City advances this project, and we would request a focus group meeting with City Staff and the City's retained consultants to provide further comments as the project advances.

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

Sincerely,



David Galbraith MCIP RPP

President, UP Consulting



Christian Tsimenidis BES

Senior Planner, UP Consulting

APPENDIX A – Comment Matrix

The following provides a detailed review of the regulations proposed in the Draft Zoning By-law with our comments and/or proposed recommendations.

SECTION 5.8 – RESIDENTIAL PARKING REQUIREMENTS		
	Minimum Parking Space Requirements	Recommendations
Additional Dwelling Unit	1 space per additional dwelling unit	Consider reducing or removing this requirement in transit-supportive areas to promote gentle density and affordable housing. As a point of reference, the City of Waterloo allows zero parking for ADUs near transit.
Apartment Dwelling Unit	1 space per unit plus 0.25 spaces per unit for visitors, with such visitor spaces clearly marked for visitors	Proposed regulation is quite high compared to parking requirements of comparable municipalities, particularly where served by transit. Consider area specific parking requirements, similar to the City of Waterloo. City wide, suggest reducing requirement to 1 space per unit, inclusive of visitor parking.
Bed and Breakfast Establishment	1 space per guest room in addition to the requirement for the dwelling unit	Consider clarifying short-term rentals as separate category if regulated.
Crisis Intervention Home	1 space per 3 residents plus the required parking for the dwelling unit	No comment
Dwelling Unit in a Non-Residential Building	1 space per dwelling unit	No comment
Garden Suite in the CMU1, CMU2, and CMU3 Zones and within 500 metres of Any Regional Road	No requirement	No comment
Garden Suite <u>not</u> in the CMU1, CMU2, and CMU3 Zones and <u>not</u> within 500 metres of Any Regional Road	1 space (in addition to the minimum parking space requirement for the principal dwelling unit)	No comment
Group Home	2 spaces	No comment
Home Child Care	No additional requirement	No comment
Home Occupation	1 space for each employee that is not a resident in the dwelling unit in addition to the requirement for the dwelling unit	No comment
Long-Term Care Home	0.35 spaces per bed	No comment
Multiple Dwelling Unit and Stacked Townhouse Dwelling Unit	1 space per unit plus 0.25 spaces per unit for visitors, with such visitor spaces clearly marked for visitors	Consider allowing 0.75-1.0 spaces per unit in higher-density or mixed-use zones. Visitor parking could be reduced to 0.15 spaces/unit with shared or on-street options.

Retirement Home	0.50 spaces per unit plus 0.20 spaces per unit for visitors with such visitor spaces clearly marked for visitors	Consider allowing shared parking or lower ratios due to reduced driving rates in older adult populations
Single Detached, Semi-Detached, Back-to-Back townhouse, and Townhouse Dwelling Unit	2 spaces per dwelling unit	Consider reducing to 1 space per unit in walkable/transit-supportive areas (CMU, around Major Transit Station Areas). Also, could negatively impact missing middle developments that have site constraints.

SECTION 5.11 – SHARED PARKING OUTSIDE OF CORE AREAS REQUIREMENTS

Category	Provision	Recommendations
Shared Parking Eligibility	Applies to buildings with ≥3 dwelling units and ≥2 non-residential uses outside Core Area Zones.	Broaden eligibility beyond rigid unit/use thresholds. Consider performance-based criteria (e.g., peak hour offset) for greater flexibility.
Reduction Amount	20% reduction for non-residential spaces only.	Consider making the reduction flexible or tiered based on parking demand management studies or distance to transit/amenities
Applicable Area	Only outside Core Areas.	Consider allowing shared parking both inside and outside core areas, with stronger encouragement near high-density or mixed-use corridors.
Justification Required	No mention of supporting study or analysis.	Consider requiring a simple shared parking study or management plan to demonstrate offset in peak periods and minimize spillover impacts.
Parking Type Reduced	Only non-residential parking.	Consider allowing shared reductions to apply to total required parking (not just non-residential) based on complementary peak demands.
Policy Integration	Standalone provision. No clear links to transportation, urban design, or TDM policies.	Consider integrating with Official Plan policies and transportation strategies to align with broader planning goals like transit support and compact form.

SECTION 5.12.A – CORE AREAS AND RESIDENTIAL EV PARKING REQUIREMENTS

Requirement	Condition	Applies To (Uses)	Recommendations
Minimum 20% of required parking spaces must be electric vehicle (EV) spaces	Applies only when more than 10 parking spaces are required	<ul style="list-style-type: none"> -Adult or continuing education school - Apartment dwelling unit - Business office - Commercial fitness centre - Community centre - Elementary school - Home improvement centre - Hospital, public - Hotel 	<p>This imposes a more immediate obligation on developers to install functional EV charging stations, which will ultimately affect affordability in units. Likewise, this exceeds the requirements set out in the Building Code which is applicable law.</p> <p>The City of Kitchener and Waterloo focus on EV-ready parking spaces, accommodating</p>

		<ul style="list-style-type: none"> - Industrial use in a single premise building - Long-term care home - Multiple dwelling unit - Post-secondary school - Private school - Retirement home - Shopping centre - Stacked townhouse dwelling unit - Theatre 	future installation of charging equipment, but not necessarily equipped at the outset.
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SECTION 5.15 – BICYCLE PARKING SPACES REQUIRED FOR CERTAIN RESIDENTIAL USES			
Use	Number of Short-Term Bicycle Parking Spaces Required	Number of Long-Term Bicycle Parking Spaces Required	Recommendations
Apartment Dwelling Unit	0.05 spaces/unit – notwithstanding this standard, a minimum of 4 and a maximum of 12 spaces per building containing apartment dwelling units shall be provided	1.0 spaces/unit in Core Areas and, 0.5 spaces/unit outside of Core Areas (everywhere else in the City)	No comment
Long-Term Care Home	2 spaces	5% of vehicle parking spaces for 100 beds, 1.5% after	No comment
Multiple Dwelling Unit and Stacked Townhouse Dwelling Unit (without exclusive private garages)	0.05 spaces/unit - notwithstanding this standard, a minimum of 4 and maximum of 12 spaces per building containing dwelling units shall be provided, minimum of 4, maximum of 12 (per block)	1.0 spaces/unit in Core Areas and 0.5 spaces/unit outside of Core Areas (everywhere else in the City)	No comment
Retirement Home	2 spaces	5% of the required parking spaces for the first 100 units as per Table 5.9.1 plus 1.5% of the required parking spaces for each additional 100 units	No comment

f) Required bicycle parking spaces shall not be located within dwelling units or on balconies and shall be accessible without the use of stairs.

g) Short-term bicycle parking spaces shall be located either within 15 metres of the intended public entrances of the building or facility, or no farther than the nearest motor vehicle parking space to the intended entrance, whichever is closer. **Recommendation:** Suggest removing this requirement,

as this may limit development where 15 metres may not be feasible. The location of bicycle parking can be addressed at the detailed design stage with City Staff.

SECTION 6 – Core Area Zone Standards				
	CMU1	CMU2	CMU3	Recommendations
Min. Lot Frontage	No requirement	No requirement	No requirement	No comment
Min. Lot Area	No requirement	No requirement	No requirement	No comment
Min. Required Front Yard	No requirement	No requirement	2.0 m	No comment
Min. Required Rear Yard	No requirement (2)	No requirement (2)	7.5 m	No comment
Min. Required Interior Side Yard	No requirement (3)	No requirement (3)	2.0 m	No comment
Min. Required Exterior Side Yard	No requirement	No requirement	2.0 m	No comment
Max. Front Yard (requirement applies to 70% of the lot frontage)	2.0 m	2.0 m	2.0 m	These regulations will work in conjunction with each other. In some cases, achieving both of these requirements will not be practical/achievable.
Max. Exterior Side Yard (requirement applies to 50% of the length of exterior side lot line only)	2.0 m	2.0 m	n/a	
Max. Height in Galt City Centre	Subject to By-law 150-85	Subject to By-law 150-85	Subject to By-law 150-85	Consider consolidating height provisions into this By-Law for clarity and transparency. We understand that building heights will be subject to further review (beyond the scope of this exercise), but we would encourage the city to consider increasing permitted heights within core areas.
Max. Height in Preston Towne Centre and Hespeler Village	17.0 m and no more than 5 storeys including above ground portion of parking garage in same building	17.0 m and no more than 5 storeys including above ground portion of parking garage in same building	11.0 m	We understand that building heights will be subject to further review (beyond the scope of this exercise), but we would encourage the city to consider increasing permitted heights within core

				areas, particularly given proposed Phase 2 ION LRT expansion
Min. Height	6.0 m (1)	6.0 m (1)	No requirement	No concern. The City may wish to consider a slightly reduced minimum floor height of 4.5 m consistent with other comparable municipalities
Maximum Floor Space Index In Galt City Centre And Within Urban Growth Centre As Shown On Map 3 To Official Plan	2.5	2.5	Does not apply	A 2.0 FSI translates to a building with a floor area twice the size of its lot area. In many instances, these permissions would only functionally permit a 2-3 storey building in core areas where setback requirements are minimal. In our opinion this FSI maximum is too low for core areas and should be reconsidered.
Maximum Floor Space Index In Galt City Centre And Outside Of The Urban Growth Centre As Shown On Map 3 To Official Plan	2.0	2.0	2.0	
Maximum Floor Space Index In Preston Towne Centre And Hespeler Village	2.0	2.0	2.0	
Minimum Percentage Of First Storey Wall Facing Front and Exterior Lot Line That Has Openings	70%	70%	No requirement	No comment.
Minimum Amenity Area For Multiple, Stacked Townhouse And Apartment Dwellings And Long-Term Care Homes And Retirement Homes	15.0 m ² per dwelling unit	15.0 m ² per dwelling unit	15.0 m ² per dwelling unit	<p>This standard is high relative to standards in comparable municipalities as detailed in the body of the letter. We recommend:</p> <ul style="list-style-type: none"> • Permitting private balconies and patios to contribute toward the total amenity area. • Lowering the requirement to 5-6 m² per unit, with a balance

				<p>between private and shared space.</p> <ul style="list-style-type: none"> Modifying the aggregation rule so that no more than 50% of the required common amenity area must be located in a single space.
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SECTION 7.3.A – STANDARDS FOR DETACHED DWELLING TYPE

	RR	R1	R2	Recommendations
Min. Lot Frontage	30 m	15 m	9.0 m	No comment.
Min. Lot Area	2,000 m ²	None	None	No comment.
Min. Front Yard	6.0 m	6.0 m	3.0 m	No comment.
Min. Rear Yard	7.5 m	7.5 m	7.5 m	No comment.
Min. Interior Side Yard	3.0 m	1.2 m	1.2 m on one side, 0.6 m on the other	No comment. Suggest including “Min. Exterior Side Yard Setback”
Max. Building Height	3 storeys/10.5 m	3 storeys/10.5 m	4 storeys/14.0 m	No comment.
Min. Front Yard Setback to Garage	6.0 m	6.0 m	6.0 m	Suggest adding a provision for the ‘Min. Front Yard Setback to Habitable Dwelling’.
Min. Landscaped Open Space	15%	15%	15%	No comment.

SECTION 7.3.B – STANDARDS FOR ATTACHED DWELLING TYPE

	R1	R2	R3	Recommendations
Min. Lot Frontage	7.5 m	5.5 m	5.5 m	No comment.
Min. Front Yard	6.0 m	3.0 m	3.0 m	No comment
Min. Rear Yard	7.5 m	7.5 m	7.5 m	No comment
Min. Interior Side Yard	1.2 m on end unit side; 0 m on the other	1.2 m on end unit side; 0 m on the other	3.0 m	No comment. Suggest including “Min. Exterior Side Yard Setback”

Max. Building Height	3 storeys/10.5 m	4 storeys/14.0 m	5 storeys/17.0 m	No comment.
Min. Front Yard Setback to Garage	6.0 m	6.0 m	6.0 m	No comment
Min. Landscaped Open Space	15%	15%	15%	No comment.

SECTION 7.3.C – STANDARDS FOR MULTIPLE DWELLING TYPE IN R1 AND R2 ZONES

	R1	R2	Recommendations
Min. Lot Frontage	15.0 m	12.0 m	No comment.
Min. Front Yard	6.0 m	3.0 m	No comment.
Min. Front Yard Setback to Garage	6.0 m	6.0 m	No comment
Min. Rear Yard	7.5 m	7.5 m	No comment
Min. Interior Side Yard	1.2 m	1.2 m	No comment.
Max. Building Height	3 storeys/10.5 m	4 storeys/14.0 m	No comment.
Min. Landscaped Open Space	15%	15%	No comment.
Min. Common Amenity Area	15 m ² per dwelling unit (1)(2)	15 m ² per dwelling unit (1)(2)	<p>This standard is high relative to standards in comparable municipalities. We recommend:</p> <ul style="list-style-type: none"> • Permitting private balconies and patios to contribute toward the total amenity area. • Lowering the requirement to 5-6 m² per unit, with a balance between private and shared space. • Modifying the aggregation rule so that no more than 50% of the required common amenity area must be located in a single space.
Min. Distance Between Buildings on the Same Lot	3.0 m	3.0 m	No comment.

SECTION 7.3.D – STANDARDS FOR MULTIPLE DWELLING TYPE IN R3 ZONE

	R3	Recommendations
Min. Lot Frontage	30.0 m	No comment

Min. Front Yard	4.5 m	No comment
Min. Rear Yard	7.5 m	No comment
Min. Interior Side Yard	3.0 m	No comment
Min. Distance Between Buildings on the Same Lot	3.0 m	No comment
Max. Building Height	5 storeys/17.0 m if fronting a local road, 15 storeys/52.0 m if fronting a collector or arterial road as designated on Map 7A of the Official Plan. For a building taller than 5 storeys/17.0 m, the following also applies:	No comment
Min. Height of Building Podium	3 storeys	No comment
Max. Height of Building Podium	6 storeys	No comment
Min. Step-back of Building from Edge of Podium Facing the Street Above 6 Storeys	3.0 m	No comment
Min. Separation Distance Between Portions of Buildings Higher Than 6 Storeys	25.0 m	In our opinion this is too restrictive for mid-rise development that may be 7-8 storeys in height. We recommend that this separation requirement be reserved for taller high-rise buildings—such as those in the 15 to 25-storey range, where greater spacing is warranted for privacy and light access. For mid-rise forms, a reduced separation standard should be considered, particularly where buildings are located on the same site and can be designed in a coordinated manner.
Max. Floor Area of Any Storey Above 6 Storeys	750.0 m ²	In our opinion this maximum floor area cap does not provide flexibility for developments that may range in massing and/or built-form due to site constraints or features. The city should consider and apply a more flexible framework, such as the City of Kitchener's SGA Zones that follows tiered approach: <ul style="list-style-type: none"> • Storeys 7-12 = 2,000 m² • Storeys 13-18 = 1,200 m² • Storeys 19-36 = 1,000 m²
Min. Landscaped Open Space	15%	No comment.

Min. Common Amenity Area	15 m ² per dwelling unit (1)(2)	This standard is high relative to standards in comparable municipalities. We recommend: <ul style="list-style-type: none">• Permitting private balconies and patios to contribute toward the total amenity area.• Lowering the requirement to 8 m² per unit, with a balance between private and shared space.• Modifying the aggregation rule so that no more than 50% of the required common amenity area must be located in a single space.
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Alexandra Oestreicher
Conestoga Students Incorporated (CSI)
Room 2A106
299 Doon Valley Drive
Kitchener, Ontario
N2G 4M4

July 8, 2025

Bryan Cooper
Senior Planner
City of Cambridge
50 Dickson St,
Cambridge, Ontario
N1R 8S1

RE: Support for Form-Based Zoning

Dear Bryan Cooper,

On behalf of Conestoga Students Inc., the official student association of Conestoga College, representing Conestoga College students living in and attending school in the Waterloo Region, including Cambridge, I would like to express our support for the form-based zoning by-law updates.

As the City of Cambridge is aware, Waterloo Region, like many other places in Canada, is facing an ongoing and worsening housing crisis. This crisis has accelerated the need to explore innovative solutions that meet diverse accommodation needs, including the needs of students in the city. As Conestoga College has grown its footprint through Cambridge and the surrounding municipalities, students have had an increasingly difficult time finding appropriate and affordable housing that suits their needs, with almost 60% of students reporting that the process of finding somewhere to live is difficult.¹ As such, we are pleased to see the City of Cambridge taking steps to ensure that neighbourhoods and communities are being developed and allowed to adapt to create diverse residential options that meet community needs through a mix of residential dwellings to support all community members.

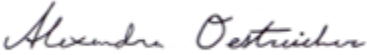
By adopting form-based zoning, the City of Cambridge addresses one of the key barriers to building more homes, by removing the need to apply for variance exemptions for lots that can otherwise fit multiple units. In doing so, the City of Cambridge is supporting the need for gentle intensification; responding to the ongoing housing crisis and both immediate and future housing demands; and supporting diverse household needs, including multi-generational, homestay, and other programs that benefit homeowners and potential tenants alike. To further address the need to build “missing middle” housing options, CSI would

¹ Nathan R. G. Barnett, ‘CSI 2024 Year-End Survey’ (Kitchener, ON: Conestoga Students Inc, May, 2025).

encourage the City of Cambridge to reduce parking minimums where at all possible, as parking is another key barrier for creating multiple-unit dwellings.²

Overall, CSI is in support of the form-based approach to zoning and appreciates the opportunity to submit our comments regarding these zoning changes. CSI looks forward to continuing to work with the City of Cambridge and other stakeholders to improve housing availability throughout our communities.

Sincerely,



Alexandra Oestreicher
President

² Karen Chapple et al., "Yes in My Backyard: Mobilizing the Market for Secondary Units," *UC Berkeley: University of California Transportation Center.*, September 1, 2011, <https://escholarship.org/uc/item/6fz8j6gx>.



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July 4, 2025

Bryan Cooper
Senior Planner - Policy
Community Development – Planning Services
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Dear Mr. Cooper:

**Re: Proposed New Comprehensive Zoning By-law (Draft April 2025) and
Draft Official Plan Amendment No. 91**

Thank you for the opportunity to comment on the City of Cambridge's proposed new Comprehensive Zoning By-law (April 2025) and companion Official Plan Amendment No. 91 (OPA No. 91).

We support the overarching goals of these proposals to modernize and simplify the City's existing zoning framework, increase housing options, and effectively accommodate future growth. These changes also form part of the City's commitments under the federal Housing Accelerator Fund, which aims to remove barriers and speed up approvals for new housing across Canada.

A core purpose of the proposed changes is to transition away from the City's traditional, approach to zoning, which focused on dwelling types and density. Instead, it will adopt a more flexible, form-based approach that emphasizes physical building characteristics, such as height, massing, and placement, rather than specific housing types or number of units within a building. This shift is designed to give developers more flexibility to build diverse housing types, particularly by enabling "missing middle" housing options within existing neighborhoods.

If approved, the proposed zoning changes would apply to all properties within Cambridge, except for certain deferred areas. These exceptions include lands designated Regional Commercial, lands within the area subject to the proposed Preston Secondary Plan, and lands within the Hespeler Road Secondary Plan study area. We

understand that City staff will initiate updates to the Zoning By-law for these deferred lands following the completion of their respective secondary planning processes. The Region supports the City's ongoing secondary planning work and underscores the importance of the implementing zoning by-law updates. These updates are crucial for establishing a transit-supportive framework within the City's Major Transit Station Areas (MTSAs), which is vital for the future implementation of ION Stage 2.

While we largely support the proposed amendments, we would like to suggest the following refinements to better align with the Region's key service areas and responsibilities. We also wish to provide some minor editorial and other general comments for the City's review and consideration.

Region of Waterloo International Airport

From an airport operations perspective, we support the City's proposed new maximum building height regulations for higher-density residential areas. Currently, Map 2 (General Land Use) of the Official Plan designates certain areas as "High Density Residential". In these areas, development density is determined by a maximum Floor Space Index (FSI) of 2.0, but without an explicit maximum building height.

The City's proposed new Residential Three (R3) Zone is intended for taller buildings on lands currently designated High Density Residential in the Official Plan. This new zone will eliminate the FSI maximum, instead regulating development by new form-based standards within the new By-law. The maximum height will be 5 storeys for properties that front on a local road and up to 15 storeys for properties that front onto collector and arterial roads.

This proposed shift to explicit building height limits, alongside form-based regulations, offers a strong approach for protecting the Region of Waterloo International Airport's operations. It provides clear, predictable vertical limits for new high-rise buildings, thereby helping to prevent incompatible land uses and potential obstructions to aircraft approach, departure, and transitional surfaces.

Despite our broad support for this change, it is important to note that all proposed high-rise developments in Cambridge must ultimately comply with Transport Canada's Region of Waterloo International Airport Zoning Regulations (AZRs). These federal regulations, established under the Aeronautics Act, are paramount and supersede any regulations within the City's Zoning By-law.

In addition, while we support the inclusion of Section 4.23 regarding the airport within the new By-law, we suggest three refinements to improve clarity:

1. **Revised Title for Section 4.23:** The current title of Section 4.23, "Special Height Provisions Adjacent to the Region of Waterloo International Airport," only highlights one aspect of the federal AZRs, which regulate more than just height. To better reflect the comprehensive purpose and intent of federal AZRs, we suggest revising

this title to “**Compliance with Region of Waterloo International Airport Zoning Regulations.**” This change would more accurately reflect the paramountcy and comprehensive nature of the federal AZRs, encompassing not only height but also other crucial safety provisions such as land use restrictions for wildlife management and electronic interference.

2. **Corrections to Map 2.3:** The information shown on Map 4.23 (Lands Affected by Region of Waterloo International Airport Federal Zoning Regulations) within this section does not appear to align with the current AZRs’ mapping approved for the airport. Please refer to the following link for a drawing of the currently in effect AZRs mapping: [YKF-Federal-Airport-Zoning-Regulations-Existing.png \(1172x734\)](#)
3. **Incorrect Reference to Appendix A (Region of Waterloo International Airport Regulation Area):** Section 1.29 (Appendices) of the draft By-law notes that a copy of “Appendix A: Region of Waterloo International Airport Regulation Area” is attached to the By-law for the convenience of the reader and is not part of this By-law. However, as the current draft By-law does not contain a copy of this appendix, it is not possible for us to review it or compare it to the AZR mapping shown in Section 4.23. To address this omission, we recommend either including the correct and most up-to-date Appendix A in the By-law, or removing the reference if the appendix is not intended to be part of the final document.

Future ARZs Updates and Ongoing Review

The Region is currently updating the airport’s current AZRs to align with the proposed updates to the Region’s Airport Master Plan, anticipated to be completed by the end of 2025. The existing AZRs, in effect since March 2009, protected the airport’s current operations until recently. However, due to advancements in aircraft operations and flight routes, they no longer sufficiently protect the current or future airport layout outlined in the proposed new Airport Master Plan, including new runway extensions, as well and current future Instrument Flight Procedures (airspace protection).

Once Transport Canada approves the proposed new AZRs, they will cover a much larger area of Cambridge than the current regulations, ensuring airspace protection even at high elevations. You can view a drawing of the Region’s proposed new AZRs at the following link: [YKF-Proposed-AZR.jpg \(8192x4027\)](#)

We anticipate that Transport Canada’s approval of the Region’s updated AZRs may take approximately 36 to 60 months. Once approved, each affected area municipality, including the City of Cambridge, will need to update their Official Plan and Zoning By-law to align with updated AZRs accordingly.

Furthermore, it is important to note that even if a proposed building or crane does not violate the current AZRs, it can still negatively impact the airport. For example, tall buildings or cranes can interfere with Instrument Flight Procedures used by airlines and

other aircraft, causing a significant negative impact on airport operations and accessibility.

Consequently, it is vital for the Region to maintain its review function of all proposed tall building developments in Cambridge. This ongoing review will ensure that such developments do not compromise the airport's operations and public safety. Developers must continue to demonstrate compliance through a Land Use Assessment from NAV Canada and obtain a letter of no objections to the Region's satisfaction.

The proposed update to a form-based Zoning By-law will be instrumental in facilitating this ongoing review by clearly outlining permissible building height limitations upfront, allowing for a more streamlined and transparent assessment process.

Section 4.10 - Municipal Water Services

Section 4.10, (Municipal Water Services) of the proposed Zoning By-law states:

"Private wells are not permitted on a lot *where municipal water services are available within the street or highway right-of-way abutting the lot unless the well which is installed for the purposes of environmental site remediation, water monitoring or site-de-watering.*"

While we support this section's intent to encourage development on municipal water services, the phrase "where municipal water services are available" imply that private wells are permitted where municipal water service are *not* available. Such an interpretation could conflict with the City's existing Source Water Protection Policies, which already prohibit private wells in certain Wellhead Protection Areas (as detailed in Appendix A of the City's Official Plan).

Furthermore, this interpretation would not align with Policy 2.J.8 of the Regional Official Plan (now an Official Plan of the City of Cambridge through Bill 23). This specific policy outlines criteria for allowing residential infill development with partial, individual on-site water, and/or individual on-site sewage services.

Based on these criteria, Section 4.10 of the proposed By-law would not adequately protect municipal drinking water sources in sensitive wellhead protection areas. The prohibition on private wells in the draft By-law is solely contingent on the availability of municipal water at the lot line, rather than considering the vulnerability of groundwater and other key criteria. To address this issue, we recommend revising Section 4.10 to align with and implement the more stringent conditions for permitting private water services as outlined above.

Lastly, although the term "private well" is used throughout the By-law, it is not defined in Section 3 (Definitions). Instead, Section 3 uses "individual on-site water services," defined as "individual, autonomous water supply systems that are owned, operated and managed by the owner of the property upon which the system is located." We suggest

replacing “private wells” with this defined term to ensure the new By-law is internally consistent.

Municipal Waste-Water Services

Although Section 4.10 of the proposed By-law restricts new development serviced by private wells, there do not appear to be any similar development restrictions regarding the use of individual on-site waste-water treatment systems (i.e., septic sewage systems). To ensure comprehensive source water protection, we suggest adding a similar provision to prohibit new individual on-site sewage systems in the City's Urban Area, especially within sensitive wellhead protection areas, unless they meet the conditions outlined in Policy 2.J.8 noted previously.

Sections 5.8 and 5.9 – Residential and Non-Residential Parking Requirement

Sections 5.8 and 5.9 of the proposed new By-law outline the minimum required number of parking spaces for different residential and non-residential land uses. These requirements depend on the unit type for residential use and the floor space for non-residential uses.

As the owner and operator of public transit for Waterloo Region, the Region has a strong interest in maximizing ridership on its GRT routes, particularly within and between MTSAs, including those in Cambridge. Cambridge's MTSAs, designated by Regional Official Plan Amendment No. 6 (ROPA 6), are legally in force and are, in most cases, currently served by ION bus (Route 302). The Preston MTSA, however, is serviced by iXpress bus (Route 206) and regular GRT bus routes (61 and 67). The Region is currently developing a business case to upgrade these transit services, considering a new light rail transit system that would extend from Kitchener to Cambridge through the proposed Stage 2 ION rapid transit corridor.

The transition from an automobile-dependent community to a transit-supportive one is a gradual, multi-year process. Effective parking management strategies are crucial during this transitional period to encourage a shift in modal split and foster a more transit-supportive environment. Conversely, the over-provision of free or low-cost parking, and the creation of areas dominated by parking infrastructure, can negatively impact ridership while incentivizing single-occupant vehicle use.

To facilitate transit-supportive development in Protected Major Transit Station Areas (PMTSAs), the Province of Ontario amended the Planning Act on June 6, 2024, through Bill 185 (Cutting Red Tape to Build More Homes Act, 2024). This amendment explicitly eliminates the ability of municipalities to mandate minimum parking spaces (other than bicycle parking) for new developments within PMTSAs and other areas where official plans require minimum densities. This new Provincial legislation directly impacts area municipal zoning by-laws by removing minimum vehicular parking requirements in these key transit-oriented areas.

To align with Bill 185, we recommend refining the proposed new By-law to remove all minimum vehicular parking requirements for properties located within all the MTSAs (which are deemed “Protected Major Transit Station Areas) in the City of Cambridge, as delineated through ROPA 6. This revision would better support transit-oriented development and the potential expansion of Stage 2 ION light rail transit into Cambridge.

We acknowledge, however, that most of Cambridge’s MTSAs are within communities subject to ongoing secondary planning processes, which are not covered by the proposed new Zoning By-law. Consequently, this revision would primarily apply to properties within MTSAs not currently subject to a secondary planning exercise, or to properties within future secondary plans once they are brought into force and aligned with Bill 185, thereby ensuring consistency in parking requirements across all MTSAs across Cambridge.

Section 6.3 - Special Use Prohibition - Drive-Through Facilities

Section 6.3 of the draft By-law currently prohibits drive-through facilities associated with any permitted use listed on Table 6.2B within any Core Area Zone (i.e., Core Areas of Galt, Preston, and Hespeler). From a transit perspective, we support this prohibition because drive-through facilities are inherently car-centric. They encourage automobile reliance and actively work against the creation of compact, pedestrian-oriented, and mixed-use environments that are vital for fostering vibrant, walkable communities around transit hubs.

To maximize transit ridership and strengthen the Region’s business case for the successful extension of the Stage 2 ION light rail transit system, we strongly recommend expanding this prohibition on drive-through facilities to include all the City’s MTSAs as part of the current zoning update.

Section 6.5 - Zone Standards – Minimum Building Heights

Section 6.5 of the proposed new By-law outlines various zoning standards for development within Core Area zones, including a minimum building height requirement of 6 metres (i.e., one storey) within 15.0 metres from the front and exterior side lot lines.

While this regulation was carried over from the City’s current Zoning By-law 150-85, we note that the City’s recent secondary planning exercises, specifically the draft Hespeler Road Secondary Plan (currently on hold) and the Main Street and Dundas Street South Secondary Plan (in effect since December 3, 2024), are shifting to a new policy framework for minimum building heights along rapid transit corridors, especially within MTSAs. This new framework generally requires multi-storey development, typically with minimums ranging from 2 to 5 storeys, to support medium and higher densities and foster transit-oriented development.

To align with this objective and further strengthen the Region's business case for the successful extension of the Stage 2 ION light rail transit system into Cambridge, we encourage the City refine its proposed new Zoning By-law. Specifically, we recommend prohibiting all new one-storey buildings along the ION rapid transit corridor as part of the current zoning update, and that the City consider establishing higher minimum building heights to further support transit.

Prohibiting one-storey buildings and increasing minimum heights in MTSAs is essential for increasing transit ridership. These low-density developments fail to generate the critical mass of residents and jobs necessary to support the higher densities required for viable light rail transit and the long-term success of the ION system.

Section 13.1.3 Wellhead Protection Overlay Zone

Section 13.1.3 indicates that the Wellhead Protection Overlay Zone aims to identify areas where certain uses are restricted to protect municipal drinking water supplies. However, the current draft By-law does not include any specific source water protection zoning regulations or corresponding mapping.

Following a discussion with City staff, we understand that this section is intended to serve as a place-holder. It will be updated through a more comprehensive review and update of the City's overall source water protection policies. This update will align with the recently updated Grand River Source Protection Plan, which came into effect on April 1, 2025. These amendments include infrastructure updates to the Region of Waterloo water supply system, affecting the Township of North Dumfries and Cities of Cambridge, Kitchener and Waterloo. Further updates to the Source Protection Plan are anticipated to take effect in 2026/2027 under Section 36 of the Clean Water Act, which the Province intends to implement upon the completion of relevant studies.

Given these recent and pending updates, we agree with City staff's approach to revisiting Section 13.1.3 of the new By-law. This will ensure that all relevant source water protection policies and mapping are incorporated once finalized. In the meantime, we suggest adding a comment in the By-law advising readers of the placeholder and that future amendments will introduce new regulations and mapping to this section, aligning with the updated Grand River Source Protection Plan. Regional staff would welcome the opportunity to participate in this future process.

Editorial and Other General Comments

Part 2 – Classification of Zones

Part 2 (Classification of Zones) of the proposed Zoning By-law outlines three floodplain overlay zones:

- Floodplain 1 – F1
- Floodplain 2 – F2

- Floodplain 3 – F3”

However, the legends in the draft maps included with the proposed Zoning By-law incorrectly label these overlay zones as “Floodway 1,” “Floodway 2,” and “Floodway 3.”

To ensure consistent terminology and avoid confusion with the actual “Floodway (F) Zone”, we recommend revising the mapping legends to accurately reflect the “Floodplain” terminology and “F1,” “F2,” and “F3” designations as used in Part 2 of the proposed By-law.

Part 3 - Definitions

Duplex dwellings - The definition of “dwelling unit” is divided into eleven different types of dwellings. Although the term “duplex” is used throughout the draft By-law, it is not included in the definition of dwelling unit. To ensure consistency throughout the By-law, it may be helpful to add a definition of duplex within Section 3.

Single detached dwelling – The term “single detached dwelling” should be in bold font in this section to indicate it is a defined term.

Section 4.22.1 - Railway Right-of-Way Setback

To avoid confusion with Light Rail Transit railway corridors - which is one of the options still under consideration by the Region for Stage 2 ION extending into Cambridge - we suggest narrowing this definition. It should apply only to active railway rights-of-way for a Principal or Secondary Main Line (i.e., VIA Rail, GO Transit commuter lines) trains, characterized by higher speeds, heavier loads, and frequent operations. The specified setbacks should not apply to Light Rail Transit railway corridors.

Section 4.22.3 - Environmental Protection Zone Setback

Subsection e) establishes a minimum 30-metre building setback from an Environmental Protection Zone for any lands within the Countryside Line, as shown on Schedule 1B of the City’s Official Plan. However, with the recent approval of Regional Official Plan Amendment No. 6 (ROPA 6), Cambridge’s Urban Area now fully aligns with the Countryside Line. This alignment creates potential ambiguity regarding whether the 10-metre or the 30-metre setback should apply in certain contexts. We suggest reviewing this section to provide clarity and to ensure consistency with the updated planning framework.

Section 4.26 – Uses Prohibited in Any Zone

Subsection b) prohibits the use of any accessory buildings or structures for human habitation or for gain or profit, unless expressly permitted by the By-law. A plain reading of this section suggests it would prohibit “hybrid shelters,” which refer to a specific type

of temporary or transitional shelter designed for individuals experiencing unsheltered homelessness. These shelters are typically managed outdoor sites that combine individual, self-contained living units (often small cabins or modular structures) with access to communal support services such as meals, washroom facilities, mental health and addiction support, and connections to pathways for permanent housing.

The Region, in partnership with the Working Centre, currently manages 50 individual hybrid dwellings with shared amenities located at 1001 Erb Street Rd. in Waterloo. To avoid unintended prohibition, this section could be revised to specifically permit or create an exception for such managed hybrid shelters, recognizing their vital role in addressing homelessness within the community.

Proposed Official Plan Amendment No. 91

To enable its proposed new form-based zoning framework, the City has drafted Official Plan Amendment No. 91 (OPA No. 91). This amendment aims to update current residential designations, remove density and Floor Space Index (FSI) limits, and simplify the policy framework for commercial uses within residential and employment designations. We have reviewed these proposed changes and have no concerns.

Thank you again for the opportunity to comment on the City's proposed new Zoning By-law and associated proposed Official Plan Amendment No. 91. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lubczynski". The signature is written in a cursive, somewhat stylized font.

John Lubczynski, MCIP, RPP

Senior Planner

City of Cambridge – Cycling and Trails Advisory Committee (CCTAC) Recommendations on the New Zoning By-law

Date: July 3, 2025

For Circulation to: City of Cambridge Planning Division

Introduction

The Cambridge Cycling and Trails Advisory Committee (CCTAC) appreciates the opportunity to contribute to the City of Cambridge's Zoning By-law Review. These recommendations reflect CCTAC's ongoing efforts to promote cycling infrastructure, support multi-modal transportation to align and enhance zoning standards with Cambridge's strategic goals around sustainability, mobility, and livability.

Following committee discussion across several meetings and a focused working meeting with Planning staff, CCTAC has prepared the following recommendations and key points of feedback.

Summary of Key Points and Recommendations

1. Bicycle Parking Ratios

Current Proposal:

- **Core Areas:** 1 space per unit
- **Outside Core:** 0.5 spaces per unit
- **Visitor Parking (City-wide):** 0.25 spaces per unit

CCTAC Feedback:

- CCTAC is **generally supportive** of the core-area requirement of 1 space per unit, noting that this is in line with other cities, such as Kitchener.
- The committee is concerned that the proposed 0.5 spaces per unit outside the core is insufficient, particularly given that some prime infill areas lie just outside the defined core zones and are still comfortably within walkable or bikeable distance to major amenities, beyond the cores themselves.
- CCTAC supports a **per-bedroom approach** to bike parking rather than a per-unit standard. For example, a 3-bedroom unit should have greater bicycle storage requirements than a bachelor/ studio apartment.
 - However, Planning has indicated that a per-bedroom requirement is not feasible at this time due to potential policy spillover into vehicular parking regulations.
- As a compromise, CCTAC recommends:
 - Applying the **core area bicycle parking ratio (1 space per unit) city-wide**, not just within defined core zones.

- Considering a **modest increase** in the core-area requirement to **1.25 or 1.5 spaces per unit**, to reflect the higher demand and to future-proof the standard as cycling uptake increases.
-

2. Bicycle Parking Space Design Standards

CCTAC Recommends:

- Inclusion of minimum size requirements for a proportion of bicycle parking spaces that are **adequate for cargo bikes, e-bikes, and mobility devices** such as scooters.
 - These larger and adaptive devices are increasingly used by residents and should be accommodated by default, not treated as optional upgrades.
 - While Planning staff indicated that **washing and charging amenities** are unlikely to be mandated at this stage, CCTAC encourages the City to:
 - Recognize these as important future-facing features,
 - Include them in future by-law revisions or site plan guideline updates, and
 - Continue to use them as **negotiation tools** during the development approvals process in the interim.
-

3. Zoning Best Practices & Peer Jurisdiction Comparisons

- CCTAC encourages Planning to further research the provisions within Peterborough's Zoning By-law that allows for a reduction in downtown vehicular parking space requirements on the basis that increased and improved alternative mobility parking provisions are in place.
 - This includes bicycle parking, but can also apply to bike share stations and car share parking spaces – all of which would aid in the goal of creating a more people-friendly environment in the core areas of Cambridge.
-

Conclusion and Final Recommendations

The committee strongly believes that a forward-looking zoning by-law should reflect the City's commitment to increasing sustainable and active transportation options. To that end, CCTAC recommends the following:

Final Recommendations:

1. Apply the 1 bicycle space per unit ratio city-wide, not only within core areas.
2. Consider a modest increase to 1.25 or 1.5 spaces per unit within the core, to encourage greater adoption of cycling.

3. Explore potential provisions for bicycle parking spaces that must meet sizing standards that can accommodate larger mobility devices, such as mobility scooters and cargo bikes. Lived-experience feedback on these provisions from CCTAC members include:
 - Parking space sizing:
 1. Regular bicycle parking: typically 0.6m wide x 1.8m long x 1.9m tall
 2. Oversized bicycle parking: typically 1m wide x 2.4m long x 1.9m tall
 - Provision of oversized bicycle parking – 5% of the “long term” provision of bicycle parking spaces should be provided as oversized dimensions, and cannot be stacked or vertical.
4. Encourage inclusion of cycling amenities (e.g., washing, charging facilities) in future by-law updates and as part of the City’s negotiation toolkit in development review processes. Such provisions could include:
 - Provision of shower facilities based on long-term parking space threshold.
 - Stacked & vertical parking space restrictions: ex., 40% of long-term bicycle parking must be on the floor level.
 - Access & path of travel requirements based on the characteristics of accessing the secured parking.
 - Payment-in-lieu of parking:
 1. Short-term – ex. \$500 per space.
 2. Long-term – ex. \$1000 per space.
 3. Would apply city-wide.
 - In addition to bicycle/AT charging and washing facilities – larger developments should include a space to maintain bicycles as well
5. Continue peer jurisdictional review, especially in cities showing leadership in integrating cycling into land use policies.

CCTAC recognizes that zoning reform is an iterative process and looks forward to engaging in future phases of refinement as cycling infrastructure and needs continue to evolve in the City of Cambridge.



August 21, 2025

Breanna Syne
Planner
City of Cambridge
50 Dickson Street, PO Box 669
Cambridge, ON N1R 1S8

**Re: Draft Zoning By-law Review
City of Cambridge**

Dear Breanna Syne,

Grand River Conservation Authority (GRCA) staff has reviewed the latest draft City of Cambridge Zoning By-law (dated April 2025).

The GRCA wishes to provide advice to the City as per Ontario Regulation 686/21, acting on behalf of the Province regarding natural hazards identified in Section 5.2 of the Provincial Planning Statement (PPS, 2024), as a regulatory authority under Ontario Regulation 41/24 and as a public body under the *Planning Act* as per our CA Board approved policies.

We understand that the City is intending to implement a new Floodway (F) zone and three new Floodplain overlay zones (F1, F2 & F3), regulating the two-zone floodway, the two-zone flood fringe, and the Galt City Centre Floodplain Special Policy Area, respectively. Based on our review of the draft Zoning By-law, we provide the following comments:

1. We request clarification regarding the distinction between the Floodway zone and the F1 overlay zone. Based on our current policies, the one-zone floodplain and the two-zone floodway share the same restrictions. As such, any one-zone floodplain areas in the Floodway zone should share the same regulations as the F1 overlay zone. It may be helpful to include a note for the F zone indicating that limited development associated with existing uses may be permitted pending consultation with the GRCA.
2. We note that that the Floodway zone includes wetland areas. Wetland areas have different restrictions compared to floodplains, and as such, the two should be differentiated. Consider whether making the F zone an overlay zone above the EP zone would be easier to interpret. Alternatively, renaming the F zone to a Hazard zone may

make more sense as an umbrella term for all GRCA regulated features (floodplains, wetland, slope hazards).

3. There appears to be no mention of slope hazards within the zoning by-law. Consider incorporating slope hazards into an appropriate zone or overlay zone.
4. Section 13.3.2(a)(i) refers to the Development, Interference with Wetlands and alterations to Shorelines and Watercourses Regulation – this regulation is outdated and should be replaced with Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits. Additionally, references to O.Reg. 41/24 should be consistently made (if it all) throughout the draft zoning by-law, where relevant.
5. The term of Regulatory Flood elevation should be consistently used throughout the draft zoning by-law (i.e., instead of using Floodline).
6. Section 4.19 (h) notes that an ARU shall not be permitted on hazard lands. Consider adding a definition for hazard lands for additional clarity.
7. Section 13.3.1 b) iii. – please revise to say the following: The building or structure is greater than **15 m²** but less than or equal to 46.5 m² or in the case of additions, the combined area of the existing building or structure and any proposed addition is equal to or less than 46.5 m²;
8. For Section 13.3.2 a), please add a point regarding safe access. Reference can be made to Policy 8.1.31 e) of the [GRCA Policy Document](#).
9. In Section 13.3.2 b) iii., the word 'generally' should be removed.

We acknowledge that the new floodplain zone and overlays aligns the zoning by-law with GRCA's policies and the Official Plan. However, we also note that there may be confusion regarding the distinction between zones and whether addition clarity in naming/separating the zones may be required. We encourage any opportunity for the City to direct applicants to the GRCA for an informal pre-consultation so that we can confirm if a proposal is feasible from a natural hazard perspective.

We appreciate the opportunity to provide comments on this project. Should you have any questions, please contact the undersigned at 519-621-2763 ext. 2270 or awang@grandriver.ca.

Sincerely,



Angela Wang
Resource Planner
Grand River Conservation Authority

23 October 2025

City of Cambridge
Community Development Department
50 Dickson Street, 3rd Floor, P.O. Box 669
Cambridge, ON N1R 5W8

Attn: Bryan Cooper
Senior Planner

RE: Request for Consistent Zoning Category
Draft Comprehensive Zoning By-law
1631-1635 Blair Road, Cambridge

Urban Initiatives, a division of Polocorp Inc., has been retained by the owners of 1631-1635 Blair Road, Cambridge (the 'Subject Lands') to assist with the ongoing redevelopment of the Subject Lands and to provide this correspondence in support of a minor adjustment to the final draft zoning map (April 2025) for the City's Comprehensive Zoning By-law Review. Specifically, this request seeks to identify 1631-1635 Blair Road as Residential One (R1) rather than Rural Residential (RR) in the new Comprehensive Zoning By-law, to ensure consistency with the approved redevelopment proposal for a two-storey stacked townhouse dwelling permitted under the existing land use permissions.

Background and Context

The Subject Lands are situated on the south side of Blair Road within the Blair Village Core Area, with surrounding land uses characterized by a mix of low-density residential and small-scale commercial. The property municipality addressed as 1631-1635 Blair Road was historically occupied by a two-storey apartment building known as the Farmer's Inn, which was lost to fire in 2021, as well as an existing single detached dwellings that remain intact. The property owners also own 1645 Blair Road, which abuts to the west.

Since the fire, the owners have been actively exploring options to redevelop the lands in a manner sensitive to the surrounding context as the property is within the Blair Village Heritage Conservation District. In September 2025, the Committee of Adjustment approved applications for Consent and Minor Variance / Permission to Change, to convey a small portion of 1645 Blair Road to 1631-1635 Blair Road as a lot addition and enable the reconstruction of the former inn as an eight-unit stacked townhouse dwelling, while retaining the two existing single detached dwellings addressed as 1631 and 1645 Blair Road (Appendix A). Concurrently, a Heritage Permit application to permit the proposed redevelopment within the Heritage District was unanimously endorsed by the Municipal Heritage Advisory Committee. Further, a corresponding Site Plan Approval application was submitted in September and is currently being reviewed by City Staff. Through these applications, both Heritage and Planning Staff have expressed their support for the proposal, noting that it represents a context-sensitive infill development that enhances the Blair Village Core, aligns with the City's heritage and housing objectives, and improves the site's functionality.

Existing Land Use Entitlements

Per the Regional Official Plan, the Subject Lands are within the ‘Protected Countryside’ and designated ‘Rural Areas.’ Under the City of Cambridge Official Plan, they are identified as ‘Countryside,’ ‘Rural,’ and part of the ‘Blair Core Area,’ as well as the ‘Primary Area’ of the Blair Village Heritage Conservation District.

Notably, following final approval of the Consent application, the Subject Lands will be regulated by three distinct zoning designations under Zoning By-law 150-85: the portion of 1645 Blair Road to be conveyed to 1631-1635 Blair Road is zoned C2, a small triangular portion of the property is zoned R1, and the balance of the lot is zoned RM4 (Figure 1).

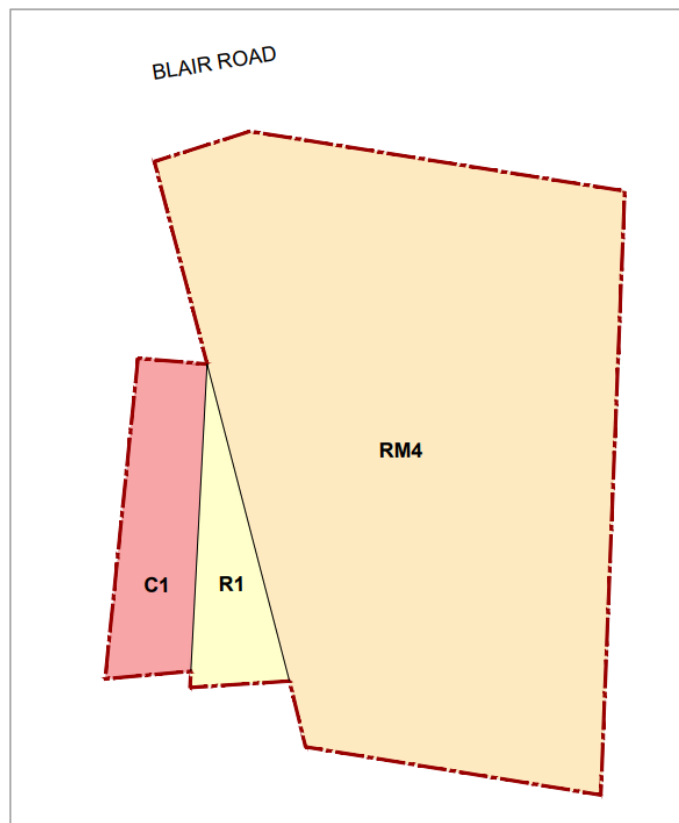


Figure 1. Zoning of Subject Lands following lot line adjustment

Following the lot addition, the Subject Lands will be split-zoned under three categories, however, in consultation with Planning Staff, it was confirmed that the predominant RM4 Zone represents the appropriate zoning category for multiple-unit residential buildings, excluding apartment buildings, under the current Zoning By-law. Following the approval of the Permission to Change application, the legal non-complying conditions associated with the former structure were reinstated and applied to the proposed redevelopment under the RM4 Zone. These permissions allow for a maximum of nine (9) dwelling units on the lot (8 mixed terrace units and 1 detached one-family dwelling), a reduced front yard setback, and relief from several technical provisions related to the configuration of parking facilities, as outlined in Table 1.

Table 1. Zoning analysis of proposed development following lot addition under RM4 zone in effect

Mixed Terrace Dwelling				
Regulation (Current RM4 Zone)	Required	Provided	Existing Condition	Variance
Min. Area	n/a	1,789.0 sq m	N	N
Min. Lot Frontage	20.0 m	37.0 m	N	N
Max. Residential Density	40 upha	55.2 upha	Y	N
Min. Front Yard Setback	6.0 m	1.5 m	Y	N
Min. Interior Side Yard Setback (East)	7.5 m	10.9 m	N	N
Min. Interior Side Yard Setback (West)	3.0 m	8.5 m	N	N
Min. Rear Yard Setback	7.5 m	14.8 m	N	N
Max. Lot Coverage	40%	23.7%	N	N
Min. Landscape Open Space	30%	53.2%	N	N
Min. Common Amenity Area per Unit	30 sq m	50.6 sq m	N	N
Min. Distance btwn. Buildings	3.0 m	5.2 m	N	N
Planting Strip & Fencing	Required	Not Provided	Y	N
Min. Number of Parking Spaces	11 spaces	13 spaces	Y	N
Mixed Terrace	8 spaces	11 spaces		
Detached One-Family	1 space	2 spaces		
Parking Located in Same Zone	Required	Not Provided	Y	N
Access Driveway Located in Same Zone	Required	Not Provided	Y	N
Min. Parking Setback from Street Line	3.0 m	0.4 m	Y	N
Min. Parking Setback from Habitable Window	6.0 m	2.2 m	Y	N
Min. Parking Aisle Width	6.0 m	0.4 m	Y	N
Min. Access Driveway Width	6.0 m	10.0 m	Y	N

Legal non-complying condition highlighted in blue

Draft Zoning By-law (April 2025)

The City of Cambridge’s Comprehensive Zoning By-law Review seeks to simplify the number of zoning categories and introduce a set of form-based regulations. For residential zones, four categories are proposed, differentiated largely by maximum permitted height and minimum lot frontage, rather than use. That said, the Rural Residential (RR) Zone restricts development to the detached dwelling category, while all other residential zones (R1, R2, and R3) permit a wide range of residential uses, including stacked townhouses.

The Subject Lands, currently zoned RM4 for multi-residential uses, are proposed to be rezoned to the RR zone. Notably, the permitted uses and development standards in the proposed RR zone are inconsistent with both the current RM4 permissions and the proposed redevelopment for the site as multi-residential stacked townhouse dwelling. This proposed change would constitute a downzoning, eliminating as-of-right permissions for medium-density residential uses and thus creating inconsistency between the built-form and the applicable zoning. While

this will not impede the current redevelopment plans for the site, it could create on-going challenges given the legal non-conforming conditions created by the new zone category.

In reviewing the proposed zoning categories, we have confirmed that the R1 Zone is the most appropriate for the Subject Lands, as it ensures compatibility with the ultimate built form, aligns with the City’s intent to apply a less prescriptive, form-based approach to regulating land use, and provides flexibility for future adjustments to the site if required. For these reasons, it is respectfully requested that the R1 Zone be applied to the lands municipally addressed as 1631-1645 Blair Road, as this designation would align with existing and planned site conditions, support the City’s broader planning objectives, and prevent the unintended limitations associated with the proposed RR Zone in this context.

Table 2. Zoning analysis of proposed development following lot addition per the requested DRAFT R1 Zone

Multiple Dwelling Type			
Regulation (Proposed R1 Zone - DRAFT)	Required	Provided	Variance
Min. Lot Frontage	15.0 m	37.0 m	N
Min. Front Yard Setback	6.0 m	1.5 m	N (Legal Non-conforming)
Min. Interior Side Yard Setback (East)	1.2 m	10.9 m	N
Min. Interior Side Yard Setback (West)	1.2 m	8.5 m	N
Min. Rear Yard Setback	7.5 m	14.8 m	N
Min. Landscape Open Space	15.0%	53.2%	N
Min. Common Amenity Area per Unit	N/A	50.6 sq m	N
Min. Distance btwn. Buildings	3.0 m	5.2 m	N
Min. Building Height	3 storeys/10.5 m	2 storeys/8.3 m	N
Min. Number of Parking Spaces	12 spaces	13 spaces	N
Mixed Terrace	10 spaces	11 spaces	
Detached One-Family	2 spaces	2 spaces	

Official Plan Conformity

In reviewing the policies, it is our opinion that the requested change from the RR Zone to the R1 Zone is in conformity with the City’s Official Plan. The proposed zoning amendment would not conflict with the intent or direction of Sections 2.12.1 and 8.4.6, which permit a range of residential uses within Blair Village.

Specifically, Section 2.12.1 recognizes that lands within the Blair Village Core Area designation may support limited multiple residential forms, including multiple residential housing types consistent with the stacked townhouse development proposed for the Subject Lands. Furthermore, Section 8.4.6.13 provides that lands designated Rural Residential may be developed for “residential uses such as single detached dwellings,” wherein the phrase “such as” is illustrative rather than restrictive, indicating that single detached dwellings are one example among a broader set of potential residential typologies. In other words, it is our opinion that the intent of the Rural Residential designation can be appropriately implemented through the application of the R1 Zone. Further, Policy 8.4.6.4 specifies that development within the Rural Residential designation is to be evaluated on a

site-specific basis, with consideration given to lot size and the ability to accommodate private potable water and wastewater treatment systems. In this regard, it has been confirmed that the Subject Lands are capable of supporting a new drinking water well and on-site septic system to adequately service the proposed stacked townhouse development.

The following quotations from the City's Official Plan demonstrate that no policy conflict would arise from applying the R1 Zone in place of the proposed RR Zone as it relates to the Subject Lands.

2.12.1 Blair Village Core Area and Residential Area

1. The lands designated on Map 2 as Blair Core Area may be used for the following purposes: a) mixed use residential; b) **limited multi-unit residential** including bed and breakfast establishments; c) retail and service commercial uses (excluding motor vehicle repair shops, auto body repair shops, and automobile service stations or gas bars); d) public or private institutional uses including outdoor educational facilities and their accessory uses; and e) small scale business or professional offices supporting Blair Village.

2. The lands in Blair designated on Map 2 as Rural Residential may be used in accordance with **Policy 8.4.6.13**, excluding agricultural uses.

8.4.6 Residential Designations

8.4.6.4. Residential development in the Rural Residential designation will be dependent on the size of the lot suitable to accommodate potable water and wastewater treatment.

8.4.6.13. Lands in a Rural Residential designation may be developed and used for **residential uses such as single detached residential dwellings** and agricultural uses where no intensive livestock operation, fur farming or fish farming is involved. Notwithstanding this policy agricultural uses are n

Conclusion

In conclusion, we are requesting that the lands municipally addressed as 1631-1645 Blair Road be zoned Residential One (R1) in the new Comprehensive Zoning By-law. The requested change from the RR Zone to the R1 Zone ensures consistency with the existing RM4 permissions, the approved redevelopment, and the applicable Official Plan policies. The R1 Zone more accurately reflects the planned multi-residential form of development and avoids the unintended downzoning that would result from applying the RR Zone. This adjustment maintains conformity with the City's planning objectives and provides a clear, appropriate zoning framework consistent with the built form and context of the Subject Lands.

Respectfully submitted,
Urban Initiatives



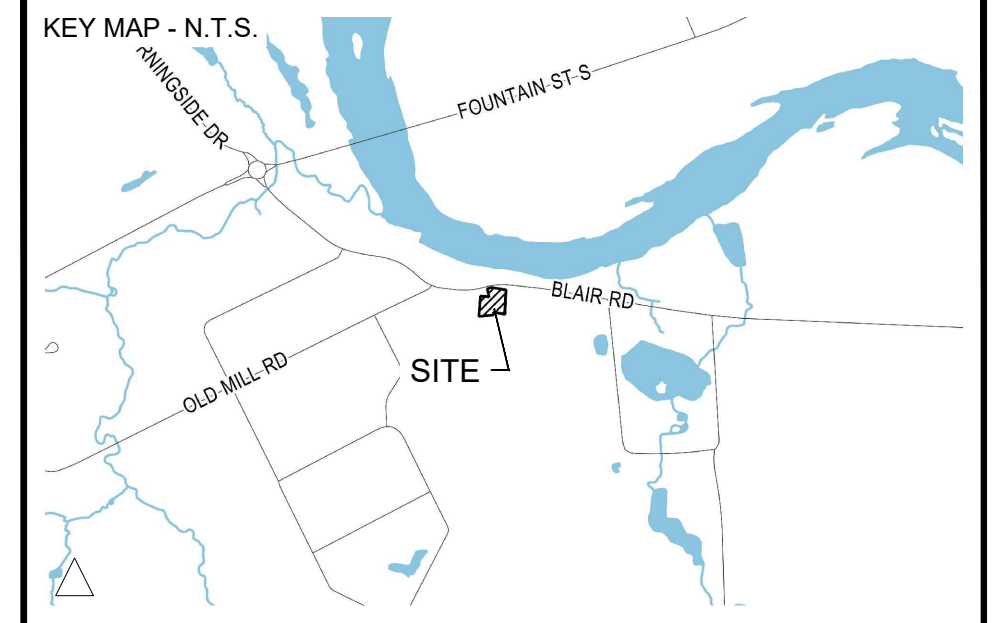
Matthew Warzecha, MCIP, RPP
Director of Planning & Development



Grant F. Eveleigh
Planning Technician & Designer

APPENDIX A

PROPOSED SITE PLAN



SITE DATA

ZONE: RM4 (BY-LAW 150-85)
 USE: MIXED TERRACE DWELLING

REGULATION	REQUIRED	PROPOSED	COMPLIES
Lot Area	-	1,783.0 m ²	-
Net Lot Area	-	1,762.3 m ²	-
Lot Frontage (min.)	20.0 m	37.0 m	Y
Number of Residential Units	-	9	-
Single Detached Dwelling (existing)	-	1	-
Mixed Terrace Dwelling (proposed)	-	8	-
Net Density (min.) ¹	40 upha	55.2 upha	N*
Front Yard (min.)	6.0 m	1.5 m	N*
Interior Side Yard, West (min.)	7.5 m	8.5 m	Y
Rear Yard (min.)	7.5 m	14.8 m	Y
Lot Coverage (max.)	40%	23.7%	Y
Landscape Open Space (min.)	30%	52.1%	Y
Landscape Open Space, Front Yard (min.)	45%	88.5%	Y
Distance between Buildings on Same Lot (min.)	3.0 m	5.2 m	Y
Common Amenity Area per Units	30 m ²	47.9 m ²	Y
Planting Strip and Fencing	Required	Not Provided	N*
Parking within Same Zone	Required	Not Provided	N*
Access Driveway within Same Zone	Required	Not Provided	N*
Parking Setback to Habitable Window	6.0 m	2.2 m	N*
Parking Aisle Width (min.)	6.0 m	0.4 m	N*
Access Driveway Width (min.)	6.0 m	10.0 m	Y
Parking Setback from Street Line	3.0 m	0.4 m	N*
Step Encroachment (max.)	0.5 m	4.8 m	N*

PARKING SPACES	REQUIRED	PROPOSED	COMPLIES
Parking, Mixed Terrace (1unit)	8	9	Y
Visitor Parking (0.25/unit)	2	2	Y
Parking, Single Detached (1unit)	1	2	Y
TOTAL	11 spaces	13 spaces	Y

Accessible Parking Spaces: 1 space

* denotes legal non-complying condition that existed prior to fire loss

NOTES

- All zoning deficiencies are recognized as legal non-complying conditions of the previous structure, allowing the proposed residential reconstruction to be considered under Section 45(2) of the Planning Act.
- Residential density calculated based on portion of the lot with residential use class zones, RM4 and R1 (1,830.2 m²).
- Prior to the fire loss, the net residential density for 1631-1635 Blair Road exceeded the maximum permitted density in the RM4 zone (40 upha), with seven (7) residential units on 1,630.2 m² lot (42.9 upha).
- The ultimate width of Blair Road, as identified in the Region of Waterloo Official Plan (Schedule A), is designated up to a maximum road allowance width of 20.117 metres.
- Subject Boundary reflects lot addition from lands forming part of 1645 Blair Road per Consent application submitted 13 August 2025.

APPROVALS

CONCEPT PLAN

PARTS OF LOTS 3 AND 4,
 BEASLEY'S OLD SURVEY AND
 PART OF LOT 25, REGISTERED PLAN 580
 CITY OF CAMBRIDGE
 REGIONAL MUNICIPALITY OF WATERLOO

1631-1635 BLAIR ROAD
 CITY OF CAMBRIDGE

URBAN INITIATIVES 379 QUEEN STREET SOUTH
 KITCHENER, ON N2T 1W6
 URBANINITIATIVES.CA 519-745-3249

DATE: 2025.08.20 SCALE: 1:150 (m)
 PROJECT: 2113 DRAWN BY: GFE
 FILE: sp2113_2025.08.20_BLAIR.dwg



- LEGEND**
- Subject Boundary
 - ▼ Visitor Parking Sign
 - Barrier Free Parking Sign
 - ▲ Building Entrance
 - ▨ Tactile Plate

LED SIGNAGE

- No light spill is permitted at property line
- All LED signage subject to site plan/ lighting plan review

GRANDBRIDGE ENERGY INC. (GEB)

All structures and fixtures to meet Electrical Safety Authority and GEB minimum standards and clearances.

Contact GEB a minimum 6 months prior to any renovations, service upgrade or new in-service date, for a design and estimate, with all of the information GEB requires to prepare as per our Conditions of Service www.energytba.ca

Site must be able to support GEB equipment for placing/maintaining padmount transformer and other infrastructure.

GEB infrastructure shall not be placed over underground parking areas/structures.

Windows shall be inoperable and not protrude into the required clearance and metallic parts of the building shall be effectively grounded.

All signs and fence posts must be minimum 2m from edge of GrandBridge Energy underground duct banks.

Type A Accessible Parking Sign (Van Accessible)

1649 BLAIR ROAD
 EXISTING SINGLE
 DETACHED

#1645

#1631 - 1635

EXISTING SINGLE
 DETACHED

EXISTING SINGLE
 DETACHED

VIA EMAIL

May 5, 2025

Mayor and Members of Council
City of Cambridge
Cambridge, Ontario
N1R 8S1

Attention: Jennifer Shaw, Deputy City Clerk

**Re: May 6, 2025 Planning – Statutory Public Meeting Committee
Item 5.1: 2525-052-CD Public Meeting – Comprehensive Zoning By-law and Companion Official Plan Amendment
Preliminary Comments on Behalf of CP REIT Ontario Properties Limited
Cambridge, ON**

Our File: CHO/CAM/25-01

We are the planning consultants for CP REIT Ontario Properties Limited (“CP REIT”) for the City of Cambridge Zoning By-law Review. CP REIT is the owner of the following lands within the City of Cambridge:

- The Loblaw Distribution Centre lands located at 1105 Fountain St. N., which are currently zoned M3 s.4.1.70 and are proposed to be zoned M3 1.70;
- The Zehrs Market lands located at 180 Holiday Inn Dr., which are currently zoned CS3 s.4.1.123.2 and are proposed to be zoned CC2; and
- The Zehrs Market lands located at 400 Conestoga Blvd., which are currently zoned CS1 s.4.1.1 and the proposed zoning for the lands is to be deferred and remain subject to By-law 150-85, as amended.

We have been monitoring the Zoning By-law Review process on behalf of CP REIT, and we provided preliminary comments dated October 6, 2015, May 25, 2018 and July 17, 2019.

On April 16, 2025, we received Notice of a Public Meeting where a revised Draft Zoning By-law dated April 2025 (the “Draft By-law”) and companion Draft Official Plan Amendment (the “Draft OPA”) will be considered at a May 6, 2025 Public Meeting. According to the Staff Report No. 25-052-CD dated May 6, 2025, it is our understanding that Staff recommend that Report 25-052-CD be received. It is also our understanding that the purpose of holding a statutory public meeting under the *Planning Act* is to explain the Draft By-law and companion Draft OPA as well as to obtain public and committee comments. Staff anticipate upcoming consultation in May and June with advisory committees and anticipate bringing the final Zoning By-law and companion Official Plan Amendment to Council for a decision in Fall 2025.

On behalf of CP REIT, we have the preliminary comments below for the Draft By-law and may provide further comments as required.

Preliminary Comments for the Draft By-law:

- In general, CP REIT wants to ensure that the development potential and existing zoning permissions for their lands will not be compromised by the Draft By-law. In addition, CP REIT want wants to ensure that the permissions previously secured through approved minor variances affecting their stores remain intact.
- Section 3.0 Definitions, includes the following relevant definitions:
 - Commercial motor vehicle: has the same meaning as in the Highway Traffic Act, as amended (according to the Highway Traffic Act, as amended, commercial vehicle “means a commercial motor vehicle, a motor vehicle towing a trailer or a vehicle used to transport passengers for compensation”);
 - Drive-through service use: the use of land, buildings or structures, or parts thereof including stacking lanes, to provide or dispense products or services, either wholly or in part, through an attendant at a window or an automated machine, to customers remaining in motorized vehicles;
 - Logistics Distribution Centre: an industrial facility used for, but not limited to, the assembly, storing, sorting, processing and distribution of goods, the management of inventory and the temporary on-site storage of commercial motor vehicles or trailers for freight handling;
 - Outdoor display and sales area: an outdoor open space area, used in conjunction with the principal building or structure on the same lot, for the accessory display and/or sales of produce, merchandise or the supply of services in association with the primary use of the lot. Such a display and/or sales area may be wholly or partially contained within a temporary tent structure;
 - Outdoor Storage: an area of land that is accessory to the principal use on the same lot, for the storage of goods and materials in the open air or in portable objects such as shipping containers;
 - Retail store: an establishment in which goods, wares, merchandise, substances, articles or things are displayed, rented or sold directly to the public but does not include any use otherwise defined by this By-law;
 - Shopping centre: a commercial development, containing at least three individual business establishments, designed as a single, comprehensively planned development project with relationships between the shopping centre buildings, activities, open spaces, parking areas, loading areas, driveways, other shared facilities, public areas and adjoining streets, and held in single ownership or by participants in a condominium corporation or commercial cooperative; and
 - Warehouse: a building or part thereof, which is used primarily for the housing, storage, adapting for sale, packaging or wholesale distribution of goods, wares, merchandise, food stuff substances and articles.

As references to a "Supermarket" use have been removed from the Draft Zoning By-law, we request confirmation that a supermarket or food store will be interpreted as a Retail Store; and

For the existing distribution centre at 1105 Fountain St. N, we request clarification as to whether the parking of trailers and tractor staging would be interpreted as "outdoor storage". In addition, we request clarification as to whether the existing distribution facility would be interpreted as a "logistics distribution centre" or "warehouse" since they are separately defined. We note that site specific Section 14.1.70 refers to permissions for "warehousing and storage";

- Section 4.6.3 relates to Rooftop Mechanical Equipment and Mechanical Penthouses. In our submission, the regulation (c) that "Rooftop mechanical equipment shall be set back a minimum of 5.0 metres from all edges of a roof if it is not fully enclosed within a mechanical penthouse or screened by an architectural feature" should recognize that existing buildings may be non-compliant and may remain legal conforming. It would be appropriate to include (c) within the draft regulation "Notwithstanding the above, rooftop mechanical equipment and mechanical penthouses that existed on the effective date of this By-law are exempt from sub-section (a)" by changing to "sub-sections (a) and (c)" from "sub-section (a)".
- Section 4.12 states "Where an outdoor display and sales area is located on a lot, the following provisions apply: (a) The outdoor display and sales area shall be set back a minimum of 12 metres from a Residential Zone boundary; (b) The outdoor display and sales area shall be located outside of any required parking spaces, loading areas, sidewalks and required planting strips; and (c) Notwithstanding subsection (b), if the outdoor sales and display area is temporary (meaning a period of time not exceeding 120 days in a calendar year), it may occupy up to 10% of the parking spaces required by this By-law for the uses that exist on the same lot." The existing Loblaw garden centres associated with commercial uses are expected to require Minor Variances for compliance. In our submission, the requirements should be the subject of further review and consideration by Staff;
- Section 4.14 for Outdoor Storage states "Where accessory outdoor storage is located in an Employment Zone, the following provisions apply: (a) Outdoor storage is permitted only in a rear yard and shall not be located any closer than 9.0 metres to any lot line abutting a street. (b) The height of stored materials shall not exceed the height of the principal building on the lot, or 12 metres, whichever is the lesser. (c) The outdoor storage shall be screened by opaque fencing with a minimum height of 2.1 metres or a berm with a minimum height of 3.0 metres; and (d) Outdoor storage is not permitted within any yard abutting a Residential Zone. As noted above, for the existing distribution centre at 1105 Fountain St. N, we request clarification as to whether the parking of trailers and tractor staging would be interpreted as "outdoor storage". In our submission, the requirements should be the subject of further review and consideration by Staff as to implications for warehouse distribution centres;
- Section 4.17 relates to Planting Strips. Section 4.17(a) requires a 3.0 m wide planting strip that is a minimum of 1.5 m in height. It is not clear as to how the minimum of 1.5 m in height is to be achieved with a planting strip. For example,

under the corresponding existing Zoning regulations under Section 2.4.2.3 of Zoning By-law 150-85, as amended, options for planting strips include: (a) a minimum 3.0 m wide planting strip with plant materials forming a visual screen of not less than 1.5 m in height and fencing of 1.5 m in height; or (b) a minimum 3.0 m wide planting strip with an earth berm/fence of 1.5 m in height; or (c) a combination of (a) and (b); or a minimum 1.5 m wide sodded or planted strip with a 1.5 m high solid fence.” In our submission, there should be similar options under the Draft By-law to achieve visual screening. In addition, in order to avoid rendering existing Planting Strips non-conforming, it would be appropriate to include a provision that planting strips that legally existed on the effective date of the By-law are exempt from the new requirement;

- Section 4.27 states that Waste Storage areas states “(a) All waste generated by the occupants of 6 or more dwelling units on a lot or from any commercial, industrial or institutional use must be stored inside a building or waste receptacle on the same lot provided the waste storage building or deep well storage receptacle is: ...” In our submission, the regulations should continue to permit waste and recycling compactors, which are typically utilized for commercial uses such as food stores.

Section 4.27(a)(i) states that Waste Storage areas shall be “Located within the interior side or rear yard”, which may render existing waste storage areas as non-compliant with an impact on the Zehrs Market located at 400 Conestoga Blvd., resulting in the need for site specific exceptions, and does not conform with Official Plan policy 5.7.8 that states “*Where possible* [emphasis added], servicing, loading, waste storage areas and building utilities/mechanical equipment will be located internal to the building or to the rear of the building and will be screened from view from adjacent streets”, where there is flexibility as to the location of Waste Storage areas.

We request clarification as to whether metal compactors for supermarket and retail uses would under (b) need to be “surrounded on three sides by masonry, concrete, or wooden walls in order to provide screening”. A provision excluding supermarket and retail compactors from screening may be required.

Lastly, in our submission, it would be appropriate to include a provision that Waste Storage areas that legally existed on the effective date of the By-law are exempt from the new requirement;

- Section 5.5 relates to Landscaping in Parking Areas, where Parking Area means “an open area of land not located within a public road or lane that is intended for the use of parking of electric and/or motor vehicles in marked parking spaces, but does not include a driveway or any area where electric and/or motor vehicles for sale, rent or repair are kept or stored.” For (a) that states “Parking areas in all zones except the Core Area Zones that have 20 parking spaces or more shall contain a minimum of five percent (5%) of their area as landscaped open space”, we suggest that additional clarity should be provided in order to understand how the required “minimum of five percent (5%) of their area as landscaped open space” will be calculated, including whether the landscaped open space is on a total site basis or if the requirement is for each parking area on site with over 20 spaces. In addition, for employment uses such as warehouse distribution centres,

-
- providing a minimum of five percent (5%) of Parking Areas as landscaped open space may lead to implications for their operation;
- Section 5.9 and Table 5.9.1 relate to Non-Residential Parking Requirements. We request clarification as to what is intended by the "Retail Commercial Establishment" reference under Table 5.9.1.71 as it is not defined and it is not clear how the use is differentiated from a Retail Store under Table 5.9.1.72, which is defined;
 - For Section 5.14 for Loading Spaces, we request clarification as to any minimum requirements. Section c) states: "a loading space is not permitted ... in an exterior side yard; and/or, in any front yard". This provision may have an impact on the Zehrs Market located at 400 Conestoga Blvd., resulting in the need for site specific exceptions, and does not conform with Official Plan policy 5.7.8 that states "*Where possible* [emphasis added], servicing, loading, waste storage areas and building utilities/mechanical equipment will be located internal to the building or to the rear of the building and will be screened from view from adjacent streets", where there is flexibility as to the location of loading spaces. Lastly, we suggest that a regulation be added that Loading Spaces that legally existed on the effective date of the By-law are exempt from the new requirements;
 - Section 5.16.1 for Drive-throughs states "Stacking spaces are required and shall be exclusive of any other parking space and aisle requirements contained within this By-law and shall be provided in accordance with Table 5.16." For lands such as 180 Holiday Inn Dr. where existing Drive-throughs are located, we suggest that a regulation be added that this section does not apply to existing drive-through service uses in order to avoid rendering existing drive-throughs as non-compliant;
 - Section 5.16.4 for Drive-throughs states "No stacking spaces, order boxes, or wall openings associated with a drive-through service use can be located in any required yard, or in front of a wall facing the front or exterior side lot line unless all of the components of a drive-through service use are located a minimum of 10 metres from the front and exterior lot lines." For lands such as 180 Holiday Inn Dr. where existing Drive-throughs are located, we suggest that a regulation be added that this section does not apply to existing drive-through service uses in order to avoid rendering existing drive-throughs as non-compliant;
 - Under Table 8.2.2. Standards the Commercial Zones, the Minimum required landscaped open space is "20%". In our submission, 20 percent landscaped open space is considerably in excess of the requirements in other municipalities and may result in less intensive development. In order to avoid rendering existing developments as non-complying, Special Provision (2) "As legally existing on the effective date of this By-law" should be applicable, whereby the Standard would be "20% or (2)";
 - For 1105 Fountain Street North:
 - Under Table 5.9.1 of the Draft Zoning By-law, the proposed parking requirement for a "logistics distribution centre" is 1 per 100 sq. m of net floor area, while a "warehouse" use is 1 space per 150 sq. m of net floor area. As noted above, we request clarification as to whether the existing

distribution facility would be interpreted as a “logistics distribution centre” or “warehouse”. In order to carry-over the existing parking requirement under Zoning By-law No.150-85, as amended, we request that a site specific exemption to be added to s.14.1.70, that "Notwithstanding the parking requirements under Table 5.9.1 - Non-residential Parking Requirements, an area equivalent to 20% of the lot area shall be provided as a parking lot and shall be provided in addition to any parking spaces or parking lot used or reserved for the purpose of storing heavy vehicles, equipment, machinery, stock or the fleet vehicles of a courier or delivery service"; and

- In Table 9.3 Standards for Employment Zones, there is a proposed maximum building height under 9.3.8, which is not regulated under the current Zoning By-law. In order to provide flexibility for future intensification of the lands, we request that a site specific exemption be added to s.14.1.70, to notwithstand the proposed maximum height of 21 m under Table 9.3.8.

We would welcome the opportunity to meet with Staff to discuss our comments.

In addition, please kindly ensure that the undersigned is notified of any further meetings with respect to this matter as well as notice of approval of the Zoning By-law.

Should you have any questions, or require further information, please do not hesitate to call.

Sincerely,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. CP REIT Ontario Properties Limited (via email)



DELIVERED VIA EMAIL

September 26, 2025

City of Cambridge

City Clerks Department
50 Dickson Street, 1st Floor
Cambridge, ON
N1R 8S1

Attention: Ms. Danielle Manton, City Clerk

RE: Request for Notification
City of Cambridge New Zoning By-law
516 Hespeler Road ("*Subject Lands*")
Related City File No. OR06/22
City of Cambridge, Region of Waterloo

Dear Madam,

Our office represents the Registered Owner of the above captioned lands.

We write to request Notification of any updates, reports, Public Hearing and Decision related to the City's new Comprehensive Zoning By-law.

The Subject Lands are currently subject to an ongoing, site-specific Zoning By-law Amendment application, which is currently before the Ontario Land Tribunal (OLT) and therefore, we wish to be kept apprised of any updates pertaining to the new Zoning By-law.

Please acknowledge receipt of this request.

Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,
BLACKTHORN DEVELOPMENT CORP.

Maurizio Rogato, B.U.R.Pl., M.C.I.P., R.P.P.
Principal