



Ramsay Planning Inc.

(Email Only)

March 21, 2023

Mayor and Members of Council
City of Cambridge

Dear Mayor and Members of Council:

**Re: 15 Clover Avenue Official Plan and Zoning By-law Amendment Applications
City File OR01/20
Our File No. P2023**

Allan Ramsay Planning Associates Inc. has been retained by a group of residents in the Clover Avenue/Myers Road area (the “**Existing Residents**”) to provide a land-use planning opinion with respect to Official Plan and Zoning By-law Amendment applications (the “**Applications**”) at 15 Clover Avenue (the “**Subject Lands**”). The Applications, submitted by 10184217 Canada Corporation (“**101 Can Corp**”), will permit a 30-unit infill residential development consisting of 24 stacked townhouse and 6 street townhouse dwellings.

Background:

(i) Subject Lands and Surrounding Area

The Subject Lands comprise a 0.54 ha. rectangular shaped parcel located on the east side of Clover Avue, north of Myers Road in the south-east are of Galt. The Site has a frontage along Clover Avenue of approximately 135 metres (433 feet). Clover Avenue is a dead end street terminating at the north end.

The Subject Lands contain a single detached dwelling that will be demolished to construct the development. The site generally slopes down from the southern property line towards the northern end of the subject lands. The southern and northern portion of the Subject Lands is currently heavily vegetated with trees. The northern portion of the Subject Lands are identified as being the site of an unevaluated wetland that extends into the abutting lands to the northeast.

Surrounding the Subject Lands is an established low-density residential community that mainly comprises single detached dwellings. To the east, there are single detached dwellings on larger lots, having frontage along Myers Road. Further east, there is a newer townhouse development along Lisbon Pines Drive. To the south is Meyers Road, beyond which is a church building and low-density residential dwellings. Directly on the west side of Clover Avenue are one (1) and two



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Page 2

(2) storey single detached dwellings. Immediately north of the subject lands is the Copperfield Drive Woodlot, which contains a wetland feature regulated by the Grand River Conservation Authority (GRCA).

(ii) Proposed Development and Application

101 Can Corp is proposing to develop the subject property as follows:

- two (2) blocks of stacked townhouses. Each block contains a four (4) storey building with twelve (12) dwellings units for a total of twenty-four (24) stack townhouse dwellings units. One (1) stacked townhouse building faces Clover Avenue and has a front yard setback of 4.5 m. The other stacked townhouse building faces the rear property line with a rear yard setback of 5.78 m. Each residential unit is proposed to have one (1) dedicated garage car parking space accessed off of an 8 m central drive aisle located between the two buildings. Nine (9) visitor parking spaces are proposed in a small parking area located along the south side of the property.
- A block of six (6) street townhouses. The street townhouses have a three (3) storey building height with a front yard setback of 3.36 m. Each unit has a private outdoor amenity area in the rear yard. Each unit has a driveway with access from Clover Avenue. Two parking spaces are provided for each unit; one (1) space in a dedicated garage and one (1) space in the driveway.
- An open space/environmental block is proposed in the northerly portion of the site. This area includes the unevaluated wetland and buffer area.

In order to implement the proposal the 101 Can Corp has submitted applications as follows:

- An Official Plan Amendment to apply a site-specific provision to the property to permit a residential density of 56 units per hectare, whereas the current Low/Medium Density Residential land use designation permits a maximum density of 40 units per hectare.
- A Zoning By-law Amendment to re-zone a portion of the property RM3 and implement site specific regulations to:
 - a. Permit a residential density of 56 units per hectare. (Note: density is measured across the entire site including the environmental/open space area);
 - b. Permit a Front Yard setback of 4.5 metres (Stacked townhouses) and 3.36 m (street townhouses);
 - d. Permit a rear yard setback of 5.8 metres (stacked townhouses); and,



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Page 3

- e. Permit a minimum 8 m separation between the stacked townhouse buildings (for the central driveway)
- A Zoning By-law Amendment to re-zone a portion of the property OS1.

Official Plan Policies and Zoning

(i) City of Cambridge Official Plan

Under the City of Cambridge Official Plan (the “**City OP**”) the Subject Lands are designated as Low/Medium Density Residential.

Within the Low/Medium Density Residential the City OP permits single detached dwellings, townhouses and/or walk up apartments subject to a maximum of 40 units per gross hectare. Development in the Low/Medium Density Residential is subject to the infill, intensification and compatibility policies of the City OP. These policies are discussed in the Planning Analysis section of this report.

The Subject Lands are currently zoned as R4 (Residential), a zone that permits single detached dwellings.

Planning Analysis:

In my opinion the Application represents an overdevelopment of the Site and will result in a built form that will not fit harmoniously with the surrounding area. The proposed does not conform with the City of Cambridge Official Plan and does not represent good planning as follows:

(i) Conformity with the Cambridge Official Plan

As noted above, the City’s OP designates the property as “Low/Medium Density Residential”, which permits a maximum density of 40 units per hectare (UPH). The proposed townhouse development includes a total of 30 residential units, which is 56 UPH. In my opinion the proposal to increase the site density from 40 UPH to 56 UPH does not conform with several Official Plan policies requiring new infill and intensification development to respect the existing character of the surrounding area and is not compatible with the lower density, smaller detached dwellings located on the west of Clover Avenue and on Myers Road that abut the subject lands. For example:

- **2.6.1(8) Intensification within the Built-up Area** requires “Infill, *intensification* and *redevelopment* within existing neighbourhoods will be minor in nature and will be designed to respect existing character and provide connections and linkages where possible”.



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Page 4

- **2.8 (d) Residential Lands** establish residential densities which are both appropriate to existing and new neighbourhoods and result in the compact *development*.
- **2.8 (e) Residential Lands** requires a balance of "...residential *intensification* including individual lot *intensification* that is compatible with existing and permitted uses on neighbouring properties, as well as any other key natural and *cultural heritage resources*".
- **8.4.2 (1) Residential Compatibility** encourages development in residential communities which is "...compatible with the location, density and other characteristics of neighbouring land uses. Factors to be taken into consideration in assessing the compatibility of *development* include:
 - a) the density, scale, height, massing, visual impact, building materials, orientation and architectural character of neighbouring buildings and the proposed *development*;
 - e) landscaping, setbacks, sun and shadow effects, wind effects, signage, lighting and buffering of existing development and proposed *developments*".
- **8.4.2 (2) Residential Compatibility** permits infill *intensification* and *redevelopment* within existing neighbourhoods that is minor in nature and compatible with the surrounding neighbourhood character and will be assessed on the following criteria:
 - a) comparable building height, generally within two storeys of neighbouring buildings;
 - b) massing and scale;
 - c) similar lot coverage and side yard setbacks to neighbouring housing;
 - d) maintaining the predominant or average front yard setback;
 - e) built form that respects the façade details and materials of neighbouring housing, including garage width, porches, screening and architectural details;
 - f) transportation implications; and
 - g) appropriate parking arrangements and traffic movement".
- **8.4.2 (3) Residential Compatibility** requires that the location and massing of new buildings in the residential designations must be compatible with the surrounding land use. The *City* will require sites to be designed with transition between areas of different intensity and scale.
- **8.4.3 Location Criteria for Multi-Unit Residential Development** - The *City* may facilitate or encourage the *development* of lands for *multi-unit residential development* where a site proposed for such *development* meets the following criteria:



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Page 5

“c) has a suitable size and configuration to:

- i) permit the separation or appropriate integration of on-site vehicular and pedestrian traffic;
- ii) provide for adequate access and circulation by emergency vehicles;
- iii) provide adequate on-site landscaping to: establish suitable outdoor amenities and recreational facilities for the building’s occupants; screen parking areas; and provide effective buffering and screening to ensure the privacy of outdoor recreational areas on the site as well as on adjoining properties;
- d) is proposed to be developed in such a manner and at such a scale that the site and building design, building height, setbacks, landscaping and vehicular circulation will ensure the proposed development is compatible with existing development on adjoining lands, as outlined in Section 8.4.2 of this Plan;

In my opinion the proposed development does not represent a built form that either respects or is compatible with existing and permitted uses on neighbouring properties. In particular, the scale and massing the four (4) storey stacked townhouse buildings will dwarf the one (1) to two (2) storey detached dwellings in the areas. The proposed reductions in setbacks and building separation create compatibility and transition issues. Normally compatibility and transition are best achieved through increased setbacks and separation.

(ii) Scale and Massing of the Stacked Townhouse and Street Townhouse Buildings

The proposed four (4) storey stacked townhouse buildings are out of scale with the 1 and 2 storey detached dwellings on the west side of Clover Avenue and abutting to the south. Each of the stacked townhouse buildings contains 12 dwellings units and a total floor area, including the garages, of approximately 1544 m² (16,620 sq. ft.). In contrast the detached dwellings on the opposite side of Clover Avenue range in size from 110 to 200 m² (1,200 to 2,150 sq. ft.) The proposed street townhouse building facing Clover Avenue will dwarf the much smaller detached dwellings.

The proposed stacked townhouses and street townhouses will dominate the streetscape along Clover Avenue. Combined the two, street townhouse block and the stacked townhouse block facing Clover Avenue will extend a width of approximately 73.4 m along Clover Avenue with only a small 3 m gap between the two buildings. As illustrated on Figure 1, effectively the two buildings span nearly $\frac{3}{4}$ of the length of a football field.

The streetscape impact of the proposed buildings is worsened by the height of the buildings and the reduced setbacks of the stacked townhouse building.



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Page 6

(iii) Front Yard and Rear Yard Setbacks

In order to accommodate the two stacked townhouse buildings, it is necessary to reduce both the front yard setback for the building facing Clover Avenue and the rear yard setback for the building facing the rear property line. The proposed 4.5 m front yard setback will place the building too close to the street and will be out of character with the setbacks of found on the west side to the street that range from 7.5 m to 15.3 m. The extent of the significant differences between the existing and proposed front yard setbacks is illustrated on Figure 2.

The proposed stacked townhouse building facing the rear property line will have a setback of 5.8 m. As illustrated on the 101 Can Corp proposed site plan, the area between the stacked townhouse building and the rear property is not a typical rear yard, but will function as the front yard for the twelve (12) units within this building. This area includes stairs, porches and front entrances for each of the twelve (12) units, a 1.5 m wide sidewalk and a retaining wall required to address the significant grade changes. The proposed reduction in rear yard setback does not offer any usable amenity space for the occupants of these units.

(iv) Building Separation

In order to accommodate the two stacked townhouse buildings, it is necessary to reduce the minimum separation between the two stacked townhouse buildings to 8 m. This area will be used as the central driveway providing access to twenty-four (24) garages and has four (4) storey building facades facing one another. There is no opportunity for landscaping in this area. Attached is a photograph of a similar 8m separation for a townhouse development in the GTA. In my opinion this reduced separation, combined with the four (4) storey building elevation, will create a dark, unattractive and inappropriate circumstance.

(v) Parking

The proposed stacked townhouse blocks provide 1.38 resident and visitor parking spaces per unit. Each of the twenty-four (24) stacked townhouse units includes one parking space in their private garage and nine visitor parking spaces are available. Although the proposed parking complies with the minimum zoning requirement (1.25 resident and visitor spaces/unit) the design of the proposed development with no units having driveways (and therefore no additional parking in a driveway). In some jurisdictions parking in a private garage cannot be used as fulfillment of required parking. Under the proposed site plan there is no flexibility to deal with occupants with more than one vehicle per unit. In my experience this situation invariably leads to off-site parking issues with residents and visitors utilizing short and long term parking on neighbouring streets.



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Page 7

(vi) Site Layout

The proposed site layout results in an overdevelopment of the site. The site is not deep enough to accommodate two blocks of stacked townhouse buildings. This is evident by the proposed zoning by-law amendment that includes significant reductions in front and rear setbacks and a reduction in the minimum separation distance between the (2) two buildings in order to fit the two buildings on the site. Cumulatively these reductions represent an approximately 7.5 m reduction in the openness of the site. While these reductions may be appropriate in downtown or urban centre locations they are not appropriate in an area characterized by low density, detached dwelling.

Other example of constraints created by the size and configuration of the site is the lack of outdoor amenity area and limitations related to parking, vehicular circulation and waste collection. Under the twenty-four (24) dwelling unit stacked townhouse proposal there are no opportunities to increase amenity area, open space or parking without reducing the building foot print. Similarly, the design of an 8 m wide centre driveway between the two buildings does not allow for vehicles such as moving vans, couriers, food deliveries to turn around and exit in a forward facing directions. Any vehicle, other than one parking in a private garage, will have to exit the central driveway in a reverse direction. Finally, the waste collection area is situated at the southerly end of the stacked townhouse site. For some residents this will mean carry garage and recycling material as far as 40 m from their units.

The site layout could be readily addressed through a redesign of site, the reduction in the building foot print, and, as an example, the elimination of the rear stack townhouse building.

(vii) Balconies and Amenity Area

The proposed development lacks appropriate amenity space. Amenity space is limited to balconies located on the front elevations of each of the two stack townhouse buildings. The proposed stacked townhouse units facing Clover Avenue will have twelve balconies that overlook the street and into the front yards of the properties on the west side of Clover Avenue. The twelve balconies on the rear stack townhouse building will face the rear property.

In my opinion the proposed development will result in: an insufficient amount of amenity area, a lack of outdoor, ground level amenity space and privacy and overlook issues.

Conclusion:

Overall it is my opinion that the proposed Official Plan and Zoning By-law Amendments will facilitate development that does not conform with the policies of the City OP that requires infill and intensification to respect and be compatible with neighbouring land uses. The proposed



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Page 8

development is an overdevelopment of the Site. The proposed street townhouses and stacked townhouses have a scale and massing that is out of character for the area. The proposed development will dominate the streetscape, dwarfing the one (1) and two (2) storey homes along Clover Avenue.

The proposed reductions in building setbacks and building separation will worsen, rather than improve transition to adjoining uses.

In my experience the site is suitable for some intensification, but not the extent proposed by the Applicant.

I recommend that the Applications not be approved.

If you have any questions or require further information, please do not hesitate to contact the undersigned.

Yours truly,

Allan Ramsay, MCIP, RPP

Principal,

Allan Ramsay Planning Associates Inc.

cc. Michael Campos, City of Cambridge
City Clerk, City of Cambridge



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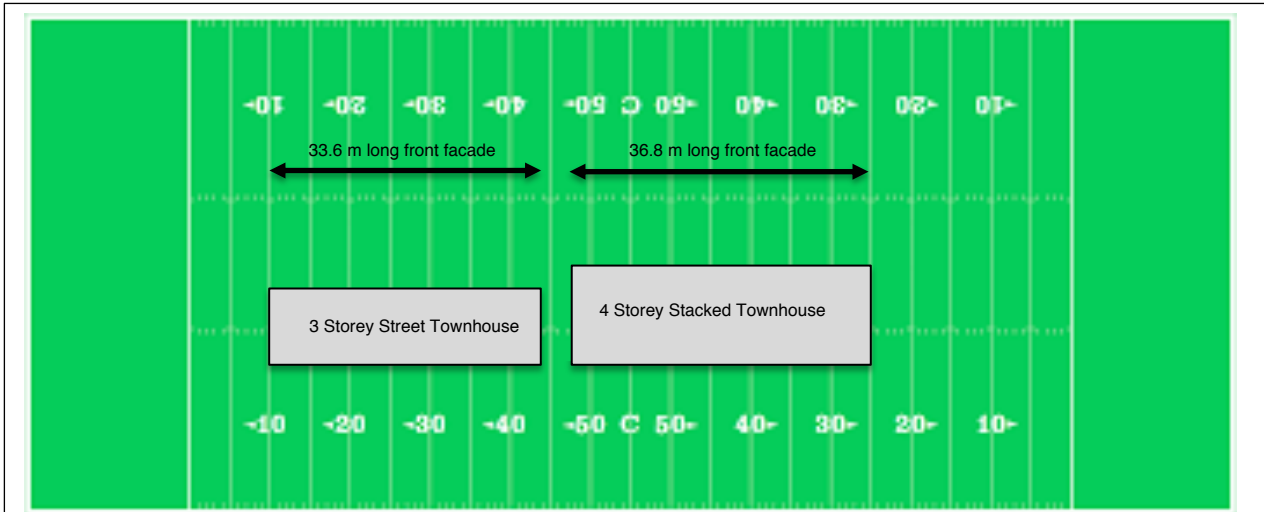


Figure 1: Streetscape Building Length Comparison



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Figure 2 Existing and Proposed Front Yard Setbacks



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Figure 3: Sample of 8m Central Driveway