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June 12, 2023

Via email

GRCA File: OR02-23 City Wide ARU

Maria Skara  
City of Cambridge  
50 Dickson Street, P.O. Box 669  
Cambridge, ON N1R 5W8

Dear Maria Skara,

**Re: Official Plan Amendment and  
Zoning By-law Amendment Applications (OR02/23)  
City Wide Accessory Residential Units  
City of Cambridge**

Grand River Conservation Authority (GRCA) staff has reviewed the above-noted applications that propose to facilitate the creation of up to three (3) residential units in residential zones throughout the City of Cambridge.

### **Recommendation**

In principle, the Grand River Conservation Authority (GRCA) would not object to the approval of these official plan and zoning by-law amendments. However, we would appreciate further clarification from the City of Cambridge on the definitions of hazard lands and floodplain areas that are affected by these amendments and the GRCA's role in approving additional residential units within the areas regulated by the GRCA under Ontario Regulation 150/06.

### **Documents Reviewed by Staff**

Staff have reviewed the following documents submitted with this application:

- Draft Public Meeting Report (23-245-CD), City Wide Official Plan and Zoning By-law Amendments-Additional Residential Units (prepared by City of Cambridge);
- Appendix A - By-law 22-017-Additional Residential Units (prepared by City of Cambridge and approved March 22, 2022); and,
- Appendix B – Table 1-Proposed Zoning By-law Changes (prepared by City of Cambridge).

### **GRCA Comments**

GRCA has reviewed these applications under the Mandatory Programs and Services Regulation (O.R. 686/21), including acting on behalf of the Province regarding natural hazards

identified in Section 3.1 of the Provincial Policy Statement (PPS, 2020), as a regulatory authority under Ontario Regulation 150/06 and as a public body under the *Planning Act* as per our CA Board approved policies.

Information currently available at this office indicates that portions of the City of Cambridge are traversed by the Grand and Speed Rivers, various tributaries of these rivers, their associated floodplains, and steep valley/erosion hazard slopes. In addition, the City contains portions of Provincially Significant Wetlands, other wetlands and their regulated. Consequently, portions of the City are regulated by the GRCA under Ontario Regulation 150/06 (Development, Interference with Wetlands and Alterations to Shorelines and Watercourses Regulation).

On January 27, 2022, the GRCA provided the following on the previous official plan amendment and zoning by-law amendment applications (OR10/21):

In principle, the Grand River Conservation Authority (GRCA) would not object to the approval of these official plan and zoning by-law amendments. However, we would appreciate further clarification from the City of Cambridge on the definitions of hazard lands and floodplain areas that are affected by these amendments and the GRCA's role in approving additional residential units within the areas regulated by the GRCA under Ontario Regulation 150/06.

Further, the GRCA had reviewed these amendments in 2022 and offered the following additional comments for consideration by the City of Cambridge:

- We note that ARUs are proposed to be prohibited within hazard lands and floodplains. While the GRCA is supportive of this approach, the GRCA requests clarification on what the City has identified as being hazard lands or floodplain areas. The draft OPA/ZBA does not provide any definitions on what is considered hazard lands or floodplain areas. Is it the areas currently identified in the Official Plan or is it the areas shown on current GRCA mapping? Further, does hazard lands include wetland areas and steep/erosion hazard sloped areas, since the GRCA would also not support development in these areas. The GRCA would appreciate clarification on the hazard lands and floodplain areas.
- We further note that there are different types of designated floodplain areas identified in the City of Cambridge's Official Plan. Both the Galt City Centre Special Policy Area (SPA) floodplain policy area and the flood fringe areas of the three Two-Zone floodplain policy areas (Preston, Hespeler, and Groff Mill Creek) allow new residential development, provided it satisfies the requirements of these policies and can obtain GRCA permit approval. It should be noted that the floodway portion of the Two-Zone floodplain areas and the One-Zone floodplain policies do not allow any new residential development. The GRCA would appreciate further clarification on the floodplain areas that are affected by these amendments.
- It should be further noted that even if ARUs are not located within hazard lands or in floodplain areas, these units may still be subject to GRCA permit approval under Ontario

Regulation 150/06. For example, a GRCA permit may be required if these units are located within the regulated allowances of the floodplain, steep slopes, watercourses, and wetland areas. Since it appears that ARUs are not subject to site plan approval by the City, the GRCA would request clarification as to the mechanism at the building permit stage of when building permits would be referred to the GRCA for either a clearance and/or GRCA permit approval.

Based on the foregoing and in principle, the GRCA would not object to the approval of these official plan and zoning by-law amendments. However, we would appreciate further clarification from the City of Cambridge on the definitions of hazard lands and floodplain areas that are affected by these amendments and the GRCA's role in approving additional residential units within the areas regulated by the GRCA under Ontario Regulation 150/06.

The above-noted applications are within a GRCA area of interest due to the presence of watercourses, floodplains, steep valley/erosion hazard slopes, wetlands, and other regulated areas within the City of Cambridge. Since these are City initiated applications and affect the City as a whole, no plan review fees will be applied to the review of these applications by the GRCA. Our current fee schedule is available under the Planning & Development section on our website at [www.grandriver.ca](http://www.grandriver.ca).

#### **For Municipal Consideration**

Please be advised that on January 1, 2023, a new Minister's regulation (Ontario Regulation 596/22: Prescribed Acts – Subsections 21.1.1 (1.1) and 21.1.2 (1.1) of the Conservation Authorities Act) came into effect. As a result, non-mandatory technical review services that the GRCA formerly provided under agreement with municipalities (e.g., technical reviews related to natural heritage and select aspects of stormwater management) will no longer be provided beyond a transition period.

Should you have any questions, please contact the undersigned at 519-621-2763, ext. 2233 or [jbrum@grandriver.ca](mailto:jbrum@grandriver.ca).

Sincerely,



John Brum  
Resource Planner  
Grand River Conservation Authority

Copy: Kathy Padgett, City of Cambridge (via email)  
Melissa Mohr, Jennifer Catarino, Jane Gurney & Cheryl Marcy, Region of Waterloo (via email)

**From:** Eric Yates  
**Sent:** Thursday, August 3, 2023 9:59 AM  
**To:** Bryan Cooper  
**Subject:** Amendment for ARU

Hi Bryan,

Thanks for taking the time to review and discuss the proposed bylaw and provide some clarifications.

The following are comments from Fire:

- Level, unobstructed walkway from the front street of the property, down side yard to the principal entrance of the suite in side or rear yard.
- Max. 45 m to principal entrances from street
- Min. 1.2 m width on principal entrance side
- Min. 0.9 m width on non-principal entrance side
- Height clearance of 2.1 m
- Access to entrances (stairs, landings) to meet OBC requirements

Sincerely,

Eric Yates, CFEI  
Chief Fire Prevention Officer  
Community Risk Reduction



Cambridge Fire Department  
1625 Bishop Street North, Cambridge, Ontario N1R 7J4  
(519) 621-6001 x 2227; Fax (519) 621-4521; TTY: (519) 623-6691

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