

## Appendix G – Draft Comments to the Minister of Municipal Affairs and Housing on modifications to ROPA No. 6

Dear Minister Calandra

Thank you for your letter dated November 2, 2023 clarifying the opportunity to provide some insight into the Region's Official Plan and how recent revisions may impact the City of Cambridge.

Bringing a vacant piece of land to the stage where homeowners are ready to move in remains long given the necessary studies, including environmental and servicing as well as master plan updates. A boundary expansion today will allow the background work to begin to ensure a well-planned, continued supply of housing that can meet our community's need beyond the 19,000 unit housing pledge.

In support of your encouragement to be ambitious and reflecting on the serious housing needs, I submit the following recommendations for your consideration.

### SUPPORT FOR PROVINCIAL AMENDMENTS

I am supportive of the provincial amendments made to the Region of Waterloo's Official Plan submission, specifically:

**a) Area #2 - Land in North Cambridge, which was Subject to the Outstanding ROPA No. 2:**

The addition of these lands to the urban boundary completes the residential node in the area and satisfies outstanding Ontario Land Tribunal disputes in a satisfactory manner. The addition of these lands also supports future transit from the Preston area past the employment lands, towards the airport and future Breslau GO station. Servicing and infrastructure are already in proximity.

**b) Area #3 – Land North of Middle Block Road, South of Kossuth Road and West of Speedsville Road:**

The addition of these lands would also add ridership to future public transit from the Preston neighbourhood, through the Conestoga College Trades Campus up to the airport, as well as the proposed GO Station in Breslau while respecting the Countryside Line within ROPA 6.

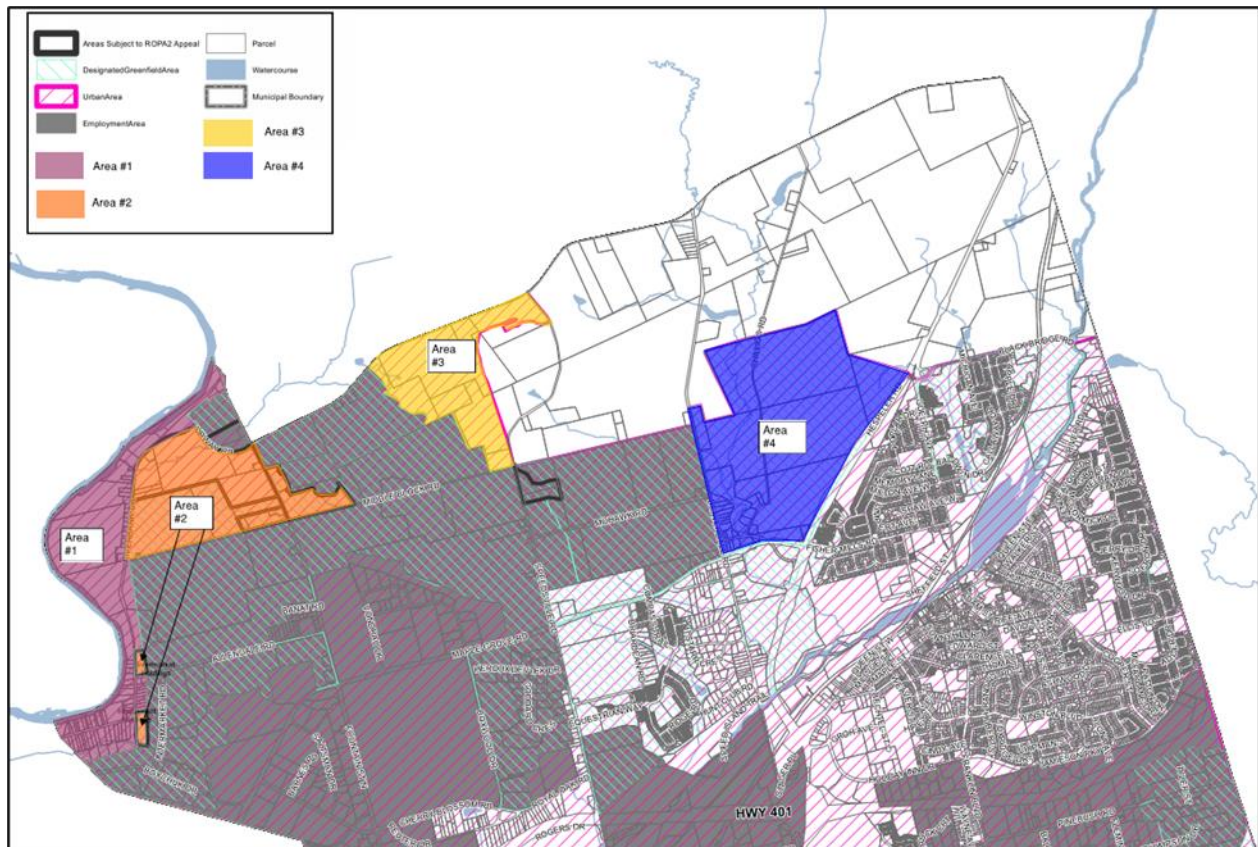
**c) Area #4 – Land North of Maple Grove Road and West of Hespeler Road:**

The addition of these lands would allow the city to begin the required background studies to create a well planned expansion to the Hespeler community, including specific land use, proper densities, park/trail/road systems and municipal servicing strategies and policies. In order to enable these lands for development a Master Environmental Servicing Plan (MESP) and Secondary Plan to determine environmental constraints, transportation, servicing and land uses is required. Expansion of capacity at the nearby Hespeler Wastewater Treatment plant is also required to service these lands. An update to the City's Transportation Master Plan should also be completed in order to account for the development of these lands and understand the implications on the City's transportation network. Therefore, if the Minister is to bring these lands into the urban area, policies should also be introduced into the Regional Official Plan to restrict development applications at this location until the necessary MESP and Secondary Plan is complete and sanitary capacity at the Hespeler Wastewater Treatment plant is available.

These lands have been identified as future development in the Regional Growth Management Strategy since 2003 and could help deliver the infrastructure needed to expand the employment lands to the west. Including both Area #3 and Area #4 supports future public transit from the Hespeler neighbourhood to the airport, as well as the proposed GO Station in Breslau.

**d) Amendments related to 1140 Main Street – Employment Land Conversion:**

The Province has proposed converting these lands from an employment area to enable other uses such as commercial/residential, subject to a future planning decision by the city. Adjacent lands are part of a secondary plan scheduled for completion at the end of this year and could allow up to 20 storey residential structures. Council previously passed a resolution on April 6, 2021 requesting that the Region remove this property from the employment area. This Provincial amendment would satisfy council's request.



Map 1 - Urban Boundary Expansions in Cambridge as modified by the Province

## AREAS OF CONCERN

There are however 2 areas of concern for our community as it relates to the revised ROP, specifically:

### A) Area #1 as Shown on Map 1: Land between Riverbank Dr. and the Grand River

The inclusion of these lands along the Grand River would not result in the creation of a significant amount of additional residential dwelling units. The reasons include:

- Does not align with our housing pledge.
- Past Council direction – in 2018 City Council did not support the inclusion of these lands within the urban boundary based on the environmental constraints and character.
- Environmental constraints – much of these lands fall within the floodplain or are subject to steep slopes and environmental features making significant redevelopment within this area unlikely. The inclusion of the lands could set an unrealistic expectation that future development is indeed feasible.

- Character – Riverbank Dr. and the surrounding homes make up a unique rural residential enclave along the banks of the river within the City. The City's Heritage Master Plan identifies Riverbank Dr. as being a scenic road. Adding this area to the urban area boundary and the resulting reconstruction/servicing of this road would undermine the character of this area valued by the community.

Therefore, I would ask that these lands be removed from the urban boundary.

**B) Site specific policy applied to 241 Queen Street West:**

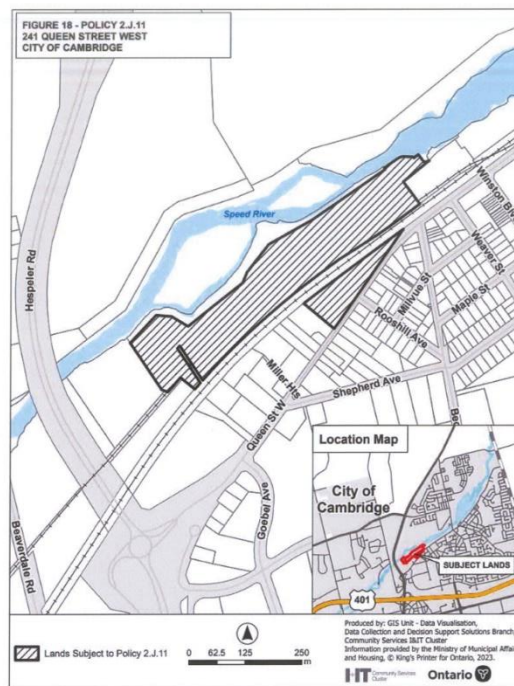
The Provincial amendment to the ROP introduced the following site-specific policy to 241 Queen Street W.:

3. [New] Part B to By-law 22-038, is modified by:

(a) creating a new Section 2.J.11 as follows:

**2.J.11 Notwithstanding the other policies of this Plan, for the lands shown on Figure 18 (241 Queen Street West) the City of Cambridge shall permit high density residential and institutional uses with the following provisions:**

- Maximum height of buildings and structures of 85 metres, inclusive of rooftop mechanical structures;**
- No maximum number of dwelling units per hectare;**
- Maximum lot coverage of 30 percent;**
- Minimum floor space index of 1.2;**
- Maximum floor space index of 2.9; and**
- No minimum lot frontage; and**



Although this land is appropriate for future development, unlike the other lands, there is no public process in the development of these lands.

The amendments by the Province obligate the city to approve a significant redevelopment without understanding how the site can operate in a transparent and consultive manner. The following issues remain unresolved:

- The property is within the flood fringe of the Speed River and following a public planning process allows the city to ensure adequate flood mitigation measures are in place;

- The property has limited frontage on a public road and therefore resolving access to the site is an important piece of following a public planning process;
- It has been requested repeatedly of the landowner to file a planning application, and to date they have chosen not to do so; and
- A railway extends across the frontage of the property and determining how to navigate over this privately held land subject to Federal regulations also impedes any short-term redevelopment of this site.

Therefore, I ask that the site-specific policies that the province imposed be removed.

## **ADDITIONAL CONSIDERATION**

As Minister of Municipal Affairs & Housing, you have encouraged heads of council to be **ambitious and reflective** of the serious need to get more homes built quickly. You have encouraged opportunities to systematically increase density and align this density with existing and planned transit. It is therefore under this premise that one additional amendment be considered.

Highway 8 cuts through the City from Highway 401 towards the southern portion of Cambridge. These lands could absorb additional density not currently recognized by planning policy. Should these lands be designated with some site specific policy for increased density, it is anticipated that development interest would increase, and further housing stock could be added to the city. As this area is not within any of our established neighbourhood areas yet is adjacent to our southern bypass it has great potential for high rise density. In addition, there are 2 new schools and a library currently being built within the nearby lands encompassing our sports complex due to open in 2026.

Accordingly, I would request that the Province give consideration to this further proposed amendment.

## **CONCLUSION**

In summary, the City is generally supportive of the recent provincial amendments to the ROP, subject to the areas of concern noted in this letter. Additionally, we request that the Province consider further amendments to increase density along Highway 8.

Cambridge is committed to its Municipal Housing Pledge to supply our community with 19,000 new homes by 2031. We are confident that with the recent provincial amendments to the ROP, it will allow sufficient building supply within the pipeline of

approvals to meet our targeted housing starts as well as allow time to properly plan further growth within the City of Cambridge.

The City looks forward to working with the Province to advance this important housing goal. Should you require any clarification on these recommendations, I am happy to discuss further with you at your convenience.