



December 20, 2023

File No. 23246

City of Kitchener
Planning Division, 6th Floor
200 King Street West
Kitchener, Ontario
N2G 4Y9

Attention: Natalie Goss, MCIP, RPP
Manager, Policy and Research

Dear Ms. Goss:

**Re: Growing Together
Response to November 2023 Draft Materials
49, 51, 53 and 55 Pine Street**

On behalf of Snider Corporation, please accept the following commentary and response to the draft OPA and ZBA documents released on November 3, 2023 for the “Growing Together” initiative as related to the above-noted properties.

Snider Corporation has acquired 49, 51 and 53 Pine Street with the intent of providing for a consolidated, comprehensive mixed-use, mid to high density redevelopment project. Snider Corporation is currently pursuing the acquisition of 55 Pine Street, to be consolidated with 49 to 53 Pine Street. The properties are located on the north side of King Street, approximately 200 metres north of Grand River Hospital and associated iON Station. The property is currently occupied by existing low-rise residential uses.

It is my understanding you had previous discussions and correspondence with Snider Corporation regarding the subject properties as they relate to the “Growing Together” initiative.

The property is proposed to be located within a Protected Major Transit Station Area in the Official Plan Amendment for the “Growing Together” initiative, which are areas intended to support transit through accommodating future growth and development through a mix of residential, office, institutional and commercial uses that provide for connectivity to various modes of transportation and have streetscapes and built forms that are pedestrian and transit friendly. The properties are located approximately 200 metres north of the Grand River Hospital iON Station, which will be planned to achieve a minimum density of 160 residents and jobs per hectare.

The properties are proposed to be designated as Strategic Growth Area A in the Official Plan Amendment for the “Growing Together” initiative, which are areas intended to accommodate intensification within predominantly low-rise residential neighbourhoods, lands further away from Rapid Transit Station stops, and/or lands where existing lots are generally too small to support high-

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72 Victoria St. S., Suite 201, Kitchener, ON, N2G 4Y9
162 Locke St. S., Suite 200, Hamilton, ON, L8P 4A9
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rise buildings. The Strategic Growth Area A designation is intended to accommodate a range of low and medium density residential uses, along with compatible non-residential uses, with maximum building height of 8 storeys and a minimum Floor Space Ratio (FSR) of 0.6.

Finally, the properties are proposed to be zoned SGA-2: Mid Rise Growth Zone in the Zoning By-law Amendment for the “Growing Together” initiative, which permits a range of low and medium-rise residential uses with a maximum building height of 8 storeys, a minimum FSR of 1.0 and no maximum FSR.

Snider Corporation supports the proposed Protected Major Transit Station Area designation. We believe the subject properties represent an excellent opportunity for intensification proximate to the Grand River Hospital iON Station and can be redeveloped as a high-density, mixed-use project designed to be compatible with and sensitive to the existing low rise residential uses on the north side of Dodds Lane.

However, Snider Corporation does not support the proposed Strategic Growth Area A designation and the SGA-2: Mid Rise Growth Zone as applied to the properties. We request the properties be designated Strategic Growth Area B and zoned SGA-3: High Rise Growth Zone (Limited).

The subject properties combined represent a small pocket of existing low rise residential uses on the east side of Pine Street; the subject properties are situated between Mount Hope Cemetery to the north, additional municipal open space to the east and existing surface parking lot the south. The subject properties are separated from the existing low rise residential uses on Mary Street and Herbert Street by Pine Street. The subject properties are within 200 metres from the Grand River Hospital iON Station and as consolidated, create a moderately sized parcel for redevelopment.

It is our opinion that redevelopment of the subject properties can be designed to be compatible with and sensitive to the existing open space use to the north and east, and existing low-rise residential uses to the east, as demonstrated by the appended preliminary development concepts.

Policy 15.D.2.5 of the proposed Official Plan Amendment for the “Growing Together” initiative allows for the consideration of site-specific applications for Zoning By-law Amendment through the consideration of a number of factors. The following provides a summary of the requirements of proposed Policy 15.D.2.5 as well as commentary and justification for the properties to be zoned SGA-3: High Rise Growth Zone (Limited) as requested.

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| Notwithstanding Policy 4.C.1.8 and 4.C.1.9, site specific applications which seek relief from the implementing zoning through a minor variance(s) or special zoning regulation(s), seek to amend the Zoning By-law to change land use permissions, and/or seek to amend this Plan to change from one land use designation to another, will consider the following factors: | | |
| a) | Compatibility with the planned function of the subject lands and adjacent lands | <i>The properties are located within a Protected Major Transit Station Area, which are areas</i> |

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| | | <p><i>intended to accommodate a significant portion of future growth and development.</i></p> <p><i>The properties are located approximately 200 metres north of the Grand River Hospital iON Station, which can be accessed directly via Pine Street; future mixed-use, mid to high-density development will assist the City in achieving the required density target of 160 residents and jobs per hectare identified for this area.</i></p> <p><i>A large portion of the area that surrounds the Grand River Transit iON Station is occupied by long-standing local business and a Regional hospital that are unlikely to be redeveloped or intensified in the short to medium-term, significantly impacting the ability to accommodate intensification in the Grand River Hospital iON Station Area. With very limited options for redevelopment along around the Grand River Hospital iON Station, the subject properties provide an opportunity for transit-supportive intensification that can be designed to be compatible with and sensitive to surrounding open space and low-rise residential land uses.</i></p> <p><i>We believe the proposed development of the subject properties can be designed to be compatible with the surrounding uses and reasonably scaled to provide for appropriate residential intensification proximate to the Grand River Hospital iON Station while adhering to the design objectives of the Strategic Growth Area B designation.</i></p> |
| b) | Suitability of the lot for the proposed use and/or built-form | <p><i>The properties are a consolidation of four (4) legal parcels, which combined create an overall site area of approximately 1,343 square metres. The consolidation of the four (4) lots with access to a local road (Pine Street) allows for the redevelopment of a larger parcel with the ability to accommodate important design considerations, including site access, building setbacks and steps, height and massing and compatibility. It is our opinion that it is the consolidation of the four</i></p> |

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| | | <i>(4) lots that makes the overall site suitable for the proposed redevelopment.</i> |
| c) | Lot area and consolidation as further outlined in Policy 3.C.2.11 | <p><i>The proposed development concept includes the four (4) properties at 49, 51, 53 and 55 Pine Street. The properties at 49, 51 and 53 Pine Street have been acquired by Snider Corporation (currently under the same umbrella company); Snider Corporation is currently in the process of acquiring the property at 55 Pine Street</i></p> <p><i>Upon the consideration and approval of planning applications that would allow for mid to high-density residential development, the properties will be merged on title.</i></p> |
| d) | Compliance with the City's Urban Design Manual and Policy 11.C.1.34 | <p><i>The preliminary development concept submitted in support of this request takes into consideration the proposed zoning regulations and development standards associated with the SGA-3 Zone as well as the applicable policies of the City's Urban Design Manual, including those pertaining to tall buildings.</i></p> <p><i>The preliminary development concept proposes a 25-storey tower with approximately 140 dwelling units and includes a rear yard tower setback and side yard tower setback of 6.0 metres where the subject properties abut open space currently owned by the City and Mount Hope Cemetery. The preliminary development concept has been designed to include appropriate tower setbacks, as specified in the draft Zoning By-law for the "Growing Together" initiative. The preliminary development concept includes two access points to an underground and podium parking with the provision of a total 58 parking spaces (approximately 0.41 spaces per unit).</i></p> <p><i>Policy 11.C.1.34 of the proposed Official Plan Amendment for the "Growing Together" initiative indicates that new tall building development must have consideration for tall building design principles, including separation, overlook, height, floor plate area, tower placement, orientation and building proportions. The policy further states that the</i></p> |

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| | | <p><i>zoning by-law will provide for design regulations to mitigate environmental impacts, create high-quality design, ensure compatibility with surrounding low and mid-rise context and ensure the development of future adjacent or nearby buildings are not frustrated.</i></p> <p><i>It is our opinion that the preliminary development concept demonstrates the subject properties can be redeveloped with sensitivity to and compatibility with surrounding open space and low-rise residential land uses. The preliminary development concept has incorporated a number of urban design guidelines and requirements with respect to tall building design; through further detailed design, we believe that these considerations can be further enhanced to meet the policy objectives of 11.C.1.34.</i></p> |
| e) | Cultural heritage resources, including Policy 15.D.2.8 | <p><i>Not applicable</i></p> <p><i>It is our understanding that there are no Designated or Listed heritage resources proximate to the subject properties.</i></p> |
| f) | Technical considerations and other contextual or site specific factors | <p><i>It is our expectation that all technical considerations and requirements for a future planning application will be summarized as part of the formal Record of Pre-Submission Consultation. We expect that these technical studies will include but are not limited to a Traffic Impact Study and Parking Justification Report, Stationary and Traffic Noise Impact, Pedestrian Wind Assessment, Urban Design Brief and Planning Justification Report.</i></p> |

Based on the commentary noted above, we believe that the properties should be designated and zoned to permit mid to high-rise residential development that is compatible with and sensitive to surrounding land uses. We respectfully request the properties be designated as Strategic Growth Area B as part of the proposed Official Plan Amendment and zoned SGA-3: High Rise Growth Zone (Limited) as part of the proposed Zoning By-law Amendment for the “Growing Together” initiative. We would like to meet with City staff to review this request in further detail, in advance of finalizing the proposed Official Plan and Zoning By-law Amendments for the “Growing Together” initiative.

On behalf of Snider Corporation, we respectfully request to be notified of all meetings, reports and progress related to the “Growing Together” initiative in the future. Please don’t hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,
GSP Group Inc.

Kristen Barisdall

Kristen Barisdale, MCIP, RPP
Vice President, Planning

cc. Gord Snider, Snider Corporation