



SHAPING GREAT COMMUNITIES

March 13, 2024

File No. 24050

Office of Mayor and City Council
Planning Division, 2th Floor
200 King Street West
Kitchener, Ontario
N2G 4Y9

Attention: Mayor Vrbanovic and Members of Council

Dear Mayor Vrbanovic:

**Re: Growing Together
Protected Major Transit Station Area Land Use & Zoning Framework
115 Benton Street**

On behalf of 1001235 Ontario Ltd., please accept the following commentary and response to the Growing Together – Protected Major Transit Station Area Land Use and Zoning Framework as presented to Planning and Strategic Initiatives Committee Meeting on January 29, 2024 and being considered by Council on March 18, 2024.

The subject property is proposed to be located within a Protected Major Transit Station Area in the Official Plan Amendment as part of the Growing Together Initiative.

The property is proposed to be designated as Strategic Growth Area B in the Official Plan Amendment as part of Growing Together initiative, which would accommodate a range of medium and high density residential housing types along with non-residential uses, such as commercial uses, personal services, offices, conference facilities, health-related offices, institutional uses and social service establishments with a maximum building height of 25 storeys, a minimum Floor Space Ratio (FSR) of 1.0 and no maximum FSR.

Finally, the property is proposed to be zoned SGA-2: Mid Rise Growth Zone in the Zoning By-law Amendment as part of the Growing Together initiative, which would permit 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.

1001235 Ontario Ltd supports the proposed Protected Major Transit Station Area and Strategic Growth Area B designation. The property represents an excellent opportunity for intensification proximate to the iON station at the intersection of Benton Street and Charles Street 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 along Hebel Place.

PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE

72 Victoria St. S., Suite 201, Kitchener, ON, N2G 4Y9
162 Locke St. S., Suite 200, Hamilton, ON, L8P 4A9
gspgroup.ca

However, 1001235 Ontario Ltd. requests the property be zoned SGA-3: High Rise Growth Zone (Limited) in the Zoning By-law Amendment as part of the Growing Together initiative.

The redevelopment of subject property can be designed to be sensitive to the existing low-rise residential uses between Hebel Place and Cedar Street as well as compatible with the existing and contemplated medium to high-density mixed-use development along Benton Street. Please find enclosed a preliminary development concept that supports this.

Policy 15.D.2.5 of the proposed Official Plan Amendment associated with 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 property to be zoned SGA-3: High Rise Growth Zone (Limited) as requested.

<p>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:</p>	
<p>a) Compatibility with the planned function of the subject lands and adjacent lands</p>	<p><i>The property is located within a Protected Major Transit Station Area, which are areas intended to accommodate a significant portion of future growth and development.</i></p> <p><i>The property is located approximately 300 metres south of the existing iON Station at the intersection of Benton Street and Cedar Street; future mixed-use, 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>The majority of the area surrounding the property is proposed to be designated and zoned to permit medium to high-density residential development. Furthermore, the property is proposed to be designated as Strategic Growth Area B; the requested SGA-3 Zone is consistent this designation.</i></p> <p><i>We believe the redevelopment of the property can be designed to be compatible with the surrounding uses (including low, medium and high-rise uses) and reasonably scaled to provide for appropriate residential intensification adjacent to existing low-rise residential uses.</i></p>

b)	Suitability of the lot for the proposed use and/or built-form	<i>As demonstrated by the attached redevelopment concept, the property is suitably sized and configured to provide for future high-density residential development that incorporates appropriate setbacks and separation from surrounding low rise residential uses.</i>
c)	Lot area and consolidation as further outlined in Policy 3.C.2.11	<p><i>Not applicable.</i></p> <p><i>While the subject property includes a small portion of land that extends to Hebel Place, it is not intended that this portion of the site will accommodate any future mixed-use buildings and/or structures.</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 mixed-use building with approximately 184 dwelling units. 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 underground and podium parking with the provision of approximately 189 parking spaces.</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 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</i></p>

		<p><i>future adjacent or nearby buildings are not frustrated.</i></p> <p><i>The preliminary development concept demonstrates the property can be redeveloped with sensitivity to and compatibility with adjacent 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	<i>Not applicable</i>
f)	Technical considerations and other contextual or site specific factors	<i>All technical considerations and requirements for a future site plan application would be identified through formal Pre-Submission Consultation with City staff. These technical studies may 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>

1001235 Ontario Ltd believes that the Growing Together initiative is a positive, comprehensive planning initiative that will continue to encourage investment in transit station areas; they are generally supportive of the strategic policy and regulatory framework as proposed.

1001235 Ontario Ltd supports the proposed Protected Major Transit Station Area and Strategic Growth Area B designation in the proposed Official Plan associated with the Growing Together initiative for the subject property. However, 1001235 Ontario Ltd. requests that Council consider applying the SGA-3: High Rise Growth Zone (Limited) to the subject property as part of the Growing Together initiative.

Thank you for taking the time to review our commentary and requests. On behalf of 1001235 Ontario Ltd, we respectfully request to be notified of all meetings, reports and decisions 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 Barisdale

Kristen Barisdale, MCIP, RPP
Vice President, Planning

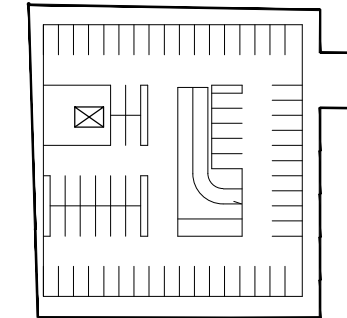
cc. George Hannoush, 1001235 Ontario Ltd.
Natalie Goss, City of Kitchener
Adam Clark, City of Kitchener



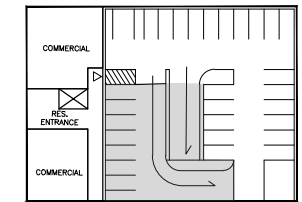
SITE AREA:	3,966m ²	PARKING:	189 spaces
UNITS:	184 units	RESIDENTIAL:	171 spaces (0.92 spaces/unit)
DENSITY:	463 upha	COMMERCIAL:	18 spaces (1 space/22.5m ²)
COMMERCIAL AREA:	400m ²	VISITOR:	20 spaces (10% of residential provided)
GFA:	24,705m ²		
FSR:	6.23		
HEIGHT:	25 storeys		

based on draft SGA-4 zoning regulations (January 2024)

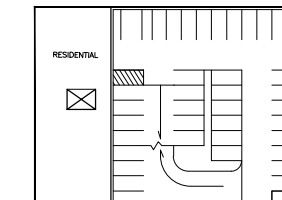
UNDERGROUND PARKING:
65 spaces



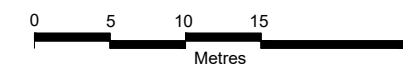
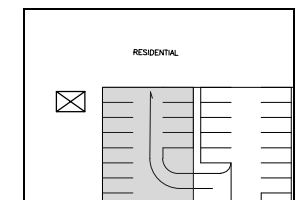
L1 PODIUM:
22 spaces



L2 - L3 PODIUM:
74 spaces



L4 PODIUM:
12 spaces



NOTE: This concept should be considered as a preliminary demonstration model that illustrates an 'order of magnitude' development scenario for the site. The number of units, floor area and parking supply are approximate and subject to more detailed design as well as municipal planning approvals.

Scale 1:500 | March 13, 2023 | Project No. 24050 | Drawn By: MN

DEVELOPMENT CONCEPT

115 Benton Street, Kitchener

