



# Masri O Architects

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**Rosa Bustamante**  
**Director of Planning and Housing Policy/City Planner**  
**T: 519-741-2200 ext. 7685**

Re: **328 & 330 Mill St – Comments on Growing Together PMTSA Land Use and Zoning Framework**

Dear Ms. Bustamante,

We have prepared this letter on behalf of the Owner of the properties municipally known as 328 & 330 Mill Street. Regarding the draft zoning, where these properties are proposed SGA-3, the Owner has the following concerns:

1. The separation requirements are too prescriptive, not taking into account project specifics such as:
  - some lots are irregularly shaped
  - to make developments possible, building design needs to involve a reasonable, efficient floor plate and
  - not all developments will be a tall tower.
2. Although the separation requirements demonstrate zoning limits and not building envelope, they do inform building envelope and therefore prescribe a particular building form that is not conducive to creative solutions.
3. The amenity requirement of 8m<sup>2</sup>/unit is too high. The added GFA may not be necessary to achieve attractive, liveable buildings. The cost to provide this quantity of additional area, as well as program the areas, could be detrimental to affordability for residents. The requirement for amenity area PDU should be scaled with respect to the total number of units so as not to create an excess of space, which is not sustainable nor affordable (ie. 4m<sup>2</sup> PDU for 100 units or less, 3m<sup>2</sup> PDU for 100+ units).
4. The amenity calculation restricts the inclusion of small balconies. Even small private balconies are usable and attractive amenity spaces for residents.
5. It is not clear who would be responsible for the cost of providing the contribution to affordable housing. The cost of affordable units could in turn be transferred to the balance of market rate units, thereby excluding a bracket of potential residents at a time when affordability is paramount.

We respectfully request the consideration of these concerns as council moves forward with the decision regarding the Growing Together PMTSA Land Use and Zoning Framework.

Regards,

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Masri O Inc. Architects