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ARTHUR STREET SOUTH
W.S.C.C. NO. 244

July 9, 2021

Katie Nasswetter, Senior Development Planner
Planning and Building Services
City of Guelph
1 Carden Street
Guelph, ON, N1H 3A1

Re: File No.: OZS21-007

2278570 Ontario Inc/5 Arthur St Developments Rezoning Application - 93 Arthur St. South

Dear Ms. Nasswetter,

We are writing on behalf of Wellington Standard Condominium Corporation No. 244 ("WSCC 244"), regarding an application by 2278570 Ontario Inc/5 Arthur St Developments (the "Applicant") to amend the Zoning By-Laws for the lands municipally known as 93 Arthur St. South.

WSCC 244 wishes to raise its concern and objection to the requested changes to current zoning requirements for residential, visitor and commercial parking spaces as highlighted in Appendix A, attached hereto. The Corporation maintains that the reduction in parking spaces and the proposal for offsite parking at 92 Arthur St. South ignore the sound planning principles established for Phase 1, 2 and 3 of the Metalworks developments. WSCC 244 further asserts that the approval of the requested zoning amendments will set an unhealthy precedent for the final development of Phase 5 of the Metalworks project and will condone the Applicant's failure to comply with the Accessibility for Ontarians with Disabilities Act (AODA).

Applicant Rezoning Application:

The Applicant proposes a total of 177 parking spaces be approved for the development, including 164 parking spaces for residential uses, three (3) barrier-free parking spaces, ten (10) visitor parking spaces, and two (2) parking spaces for commercial uses. The proposed parking requirements for the development include off-site parking spaces at 92 Arthur Street South, located on the east side of Arthur Street South. The 92 Arthur Street South parking lot will provide for 56 residential parking spaces, 10 visitor parking spaces, and 2 commercial parking spaces associated with the Phase IV development.

According to the Applicant, the proposed resident parking requirement is appropriate as it is "comparable to observed sites with a similar auto-drive mode split and approved sites and bylaws within a comparable distance to GO transit services."

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The Applicant states that "Shared parking at 92 Arthur Street will permit efficient shared parking between land uses and visitors to the Metalworks project and reduce the overall number of parking spaces required".

The applicant further states that on-street parking is currently available on Arthur Street South and Cross Street that will be available for the future tenants/residents of the Phase IV development in addition to nearby municipal parking at 141 Fountain St. and implies that this is a reasonable supplement for visitor parking.

WSCC 244 CONCERNS:

WSCC 244 is concerned over the significant rezoning changes requested by the Applicant for this fourth phase of the six phase Metalworks development. It takes particular exception to a number of misleading suggestions regarding onsite parking requirements and the suitability of other options including offsite parking located at 92 Arthur St., public street parking available on Arthur St. and Cross St. and the Neeve municipal parking lot located at 141 Fountain St.

1. INSUFFICIENT PARKING

The total requested parking space is not even close to the current zoning requirement. Based on the established zoning ratios, as detailed in Appendix A, the required number of parking spaces for the 194 residential unit development is 251 spots. This zoning requirement is 41.8% more parking than the Applicant is proposing and represents a significant deviation from the parking spaces required and provided at the first 3 phases of the Metalworks development; the 53, 63 and 73 Arthur St. projects. The variance by parking type is detailed below (Fig. 1).

PARKING	RESIDENTIAL	VISITORS	COMMERCIAL	ACCESSIBLE	TOTAL
TOTAL PROPOSED	164 (.95 ratio)	10 (0.05 ratio)	2	3 (2 visitor)	177
CITY ZONING	216 (1.1 ratio)	29 (0.15 ratio)	5	3 (visitors)	251
VARIANCE	52	19	3	0	74

Fig. 1

Residential parking spots for ALL residents are crucial to alleviating the congestion of on street parking. Residents with 2 cars, the majority of residents, have historically put demand on the quest for alternative parking, notwithstanding the proximity to downtown and public transportation options. The current parking ratio recognizes this requirement for adequate parking for all residents. The proposal to include only 109 onsite parking spaces fails to recognize the needs of residents for convenient, indoor parking that offers a secure location for vehicles. The proposal to locate 68 parking spaces offsite at 92 Arthur St. is completely contrary to the historical City of Guelph requirement to provide onsite parking.

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The Corporation disputes the Applicant's assertion that the proposed resident parking requirement is comparable to observed sites with a similar auto-drive mode split and approved sites and bylaws within a comparable distance to GO transit services. In fact, of the five recently constructed condominium buildings in close proximity to 93 Arthur St; specifically, the River House, the River Mill and the Metalworks Phases 1, 2 and 3, 60% are not comparable to the amended zoning for 93 Arthur St.

The claim by the Applicant that "Shared parking at 92 Arthur Street will permit efficient shared parking between land uses and visitors to the Metalworks project and reduce the overall number of parking spaces required" is demonstrably incorrect. A reduction in resident parking in PHASE 4 is not supported by current PHASE 1 and PHASE 2 parking space demand. Residents in both buildings regularly seek parking spaces to purchase or rent in the 2 buildings. As a result of this onsite shortage in residential parking (parking that meets the current zoning requirement) there is an overflow onto public, street parking on Arthur St., Cross St. or into the PHASE 6 (Heritage Building) parking lot.

The assertion by the Applicant that the existing street parking on Cross and Arthur Streets "will be available for the future tenants/residents of the Phase IV development" is factually misleading. Street parking on Arthur and Cross streets is very limited with 21 Arthur St. public parking spots (including 1 accessible space) from Elizabeth St. to Cross St. while Cross St. parking spaces accommodate only 6 vehicles. Both Arthur St. and Cross St. parking are currently close to full occupancy given on street use by residents of 53 and 63 Arthur. Parking by 73 Arthur residents will exhaust on street parking relief.

2. VISITOR PARKING

The suggestion that the Neeve municipal parking lot located at 141 Fountain St. is a realistic alternative for visitor parking is misleading and indicates a lack of understanding for the need and use of visitors parking during normal business hours. Notwithstanding the 9-minute round trip walk in good weather, longer in the more severe winter months, from the parking lot to the secondary Neeve St. Phase 4 entrance, the need for visitor parking spaces is not limited to residential visitors. Visitor parking is required by contractors, trades people, building maintenance staff and security staff as well as personal support workers and numerous other service providers. Most of these "visitors" require equipment and hardware to perform their tasks onsite and accordingly require onsite parking capability.

3. OFF SITE PARKING

Off site parking (Fig. 2) provides for 94 parking spaces including 4 barrier-free located at 92 Arthur. The Phase 4 development proposes use of 56 residential parking spaces at 92

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Arthur. There remaining 38 spots are designated for commercial use of which 10 visitors and 2 commercial spaces are allocated to the 93 Arthur development. With the serious shortage of residential spaces, it is unacceptable for the Applicant to provide 26 commercial spaces at the expense of the 93 Arthur St. Residents and Tenants.

92 ARTHUR ST. S OFF SITE PARKING

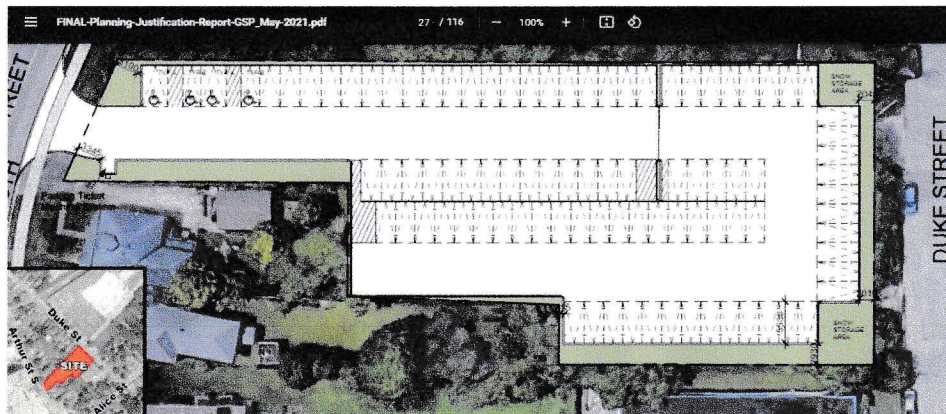


Fig. 2

4. INCREASED TRAFFIC

The main Phase 4 access for residents is on Cross St. which is designed to provide direct access to the parking garage, while minimizing traffic flow through the shared driveway with Phase 3 located at 73 Arthur St. The existing phases of the Metalworks development has added a significant increase in Arthur St. vehicle traffic adding to congestion around the current traffic intersections and creating bottlenecks at the Elizabeth Street intersection.

The Applicant's request for approval for 94 off site parking spots will increase traffic onto Arthur St. since 38% of proposed PHASE 4 vehicles (68 vehicles) are forced to use Arthur St. despite the main access off Cross St. and the secondary access from Neeve St. on the southern perimeter.

The current vacant parking lot has access to Duke St. which would alleviate the flow of vehicles onto Arthur St. but unfortunately the Applicant has designed the parking lot without access to Duke St. resulting in vehicle traffic being routed onto Arthur St.

5. ACCESSIBLE PARKING SPACES

We would like to point out that both the Applicant's proposal and the current City of Guelph By-law for "Accessible Parking do not comply with the AODA. The City of Guelph

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By-law stipulates only 3 spaces are needed if the building requires between 201 and 300 required parking spaces, the Applicant proposes that 3 barrier free spaces will be allocated for parking, 2 of which will be located on site. Presumably the remaining accessible space will be located in the 92 Arthur St. parking lot. This location is contrary to the logical and respectful practice of locating barrier free spaces in close proximity to the building entrance to maximize accessibility convenience.

The Accessibility for Ontarians with Disabilities Act ("AODA") stipulates that 9 spaces, 4 Type A and 5 Type B are mandated with the quantity of parking spaces required by current zoning. Less than 201 spaces under the AODA requires 8 barrier free parking spots, 4 type A and 4 Type B (Exhibit 16-2). The City of Guelph should not under any circumstances knowingly approve non-compliance with the AODA.

In the interest of all future residents and visitors with accessibility issues, we suggest that the Applicant's proposal and our response be forwarded to your Accessibility Committee for comment and further review.

6. PARKING SPACE DIMENSIONS

The City of Guelph has mandated that R.4 Zone parking dimensions are 3 metres by 6 metres within a Garage (*section 4.13.3.2.2*). This ensures that the parking space access which often has a concrete support column at the parking entrance is sufficient to negotiate direct entry. The Applicant is proposing to reduce the onsite garage parking space dimensions to the smaller outdoor parking size. The effect of resizing the dimensions is to increase the quantity of spaces that can be created in the garage and podium parking areas.

The Applicant's request to reduce the dimensions to the outdoor parking standard of 2.75 metres by 5.5 meters is inappropriate. The current indoor garage dimension is the standard mandated for the existing 3 phases of the Metalworks development and should be enforced. At the very minimum, we recommend you insist that the Applicant implement the design standards adopted for 53, 63 and 73 Arthur Street South, standards which we believe are consistent with the Canadian Parking Association Standards, professional standards which provide extra space for pillars, walls, and obstructions and are used by other Ontario municipalities.

7. FUTURE DEVELOPMENTS

a) PEDESTRIAN BRIDGE

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The new pedestrian bridge will provide easy access to the downtown including the Riverrun and Sleeman Centre for residents and the general population. Proximity to these 2 event related facilities will generate heavy demand for Arthur Street and Cross St. vehicle parking during all weekday and weekend event nights.

b) PHASE 5 - METALWORKS

The future development of the Applicant's residential/commercial building complex located on the north end of Arthur St. will add further on street parking demand and increased traffic flow onto Arthur St. with the accompanying congestion at the Arthur and Elizabeth intersection. This reinforces the need to limit traffic flow from the proposed 92 Arthur St. parking lot.

Approval of the Applicant's rezoning request is contrary to the current zoning standards that have been put in place to ensure that future Owners and Tenants of 93 Arthur St. enjoy the same parking facilities that the previous 3 phases have available. This includes the quantity of onsite parking spaces, the dimensions of these spaces and the accessibility of the barrier free components. Similarly, the variety of residential and commercial Visitors need access to the necessary parking spaces onsite. Failure of the City to uphold its zoning requirements by permitting reduced parking requirements and the acceptance of offsite parking will set an unhealthy precedent for the final development of Phase 5.

The rezoning application submitted by the Applicant is matter is of real concern to WSCC 244 as well as our neighbouring residents in Ward 1. We ask that the above issues and concerns be noted and appropriately addressed as part of your zoning assessment deliberations. Further, we would be pleased to respond to any questions you might have concerning the above noted issues and we request that you keep us informed of any recommendations and decisions including options you considered.

Respectfully,

On behalf of the Corporation



Michael Faye,
President, WSCC 244

Attachment: Appendix A

cc. Clerk's Department

Bob Bell, Ward 1 Councillor

Dan Gibson, Ward 1 Councillor

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Appendix A

Zoning Provision	R.4B-15 (H) Zone (Overall Development) and R.4B-15.5(H) Zone		Provided	Compliance
Lot Area, min	650 m ²		5,117.27 m ²	Yes.
Lot Frontage, min	15 m		34.79 m	Yes.
Density (uph), max			N/A	N/A
Density established by Floor Space Index (FSI)			N/A	N/A
Front Yard, min	2.5 m		2.5 m	Yes.
Building Height, max Apartment Buildings	14-storeys		14-storeys	Yes.
Distance Between Building Face, min	≤ 6-Storeys	18 m	18 m	Yes.
	> 6 Storeys	25 m	25 m	
Common Amenity Area, min	1,500 m ² total		1,698.11 m ²	No. Site-specific zoning regulations required for Common Amenity Area to be located in front yard as part of 'Mill Square'.
Landscaped Open Space, min	2,000 m ² total		2,459.85 m ²	Yes.
Off-Street Parking Spaces, min	Residential Visitors Non-Residential	1.1 / unit 0.15 / unit 1 / 33 m ²	0.95 / unit 0.05 / unit 1 / 100 m ²	No. Site-specific zoning regulations proposed.
Floor Space Index (FSI) Applies to entire site	Maximum 2.0 FSI		0.37 (1.64 total)	Yes.
Bicycle Parking Spaces, min	Residential Non-Residential	0.65 / unit 0.3 / 100 m ²	0.65 / unit 0.3 / 100 m ²	Yes.
Building Floor Plate Area, max	> 6 storeys > 8 storeys	1,200 m ² 1,000 m ²	1,238 m ² 1,045 m ²	No. Site-specific zoning regulations proposed.
Floor Plate Ratio, max	> 10 Storeys	1.5 : 1.0	1.13 : 1.0	Yes
Setback of Upper Storeys of Apartment Building, min	Arthur St S Cross St Reeve St	25 m 5.5 m 35 m	25 m 5.5 m 40 m	Yes
Setback of Underground Parking Structure, min			N/A	N/A