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April 12, 2023

Abby Watts, Project Manager, Comprehensive Zoning Bylaw Review
Infrastructure, Development and Enterprise Services
Planning and Building Services
via email: zoningreview@guelph.ca

**RE: Proposed Zoning By-law comments
Armel Corporation**

Please accept this letter as comments on the City of Guelph's Proposed Zoning By-law on behalf of our client, Armel Corporation. Armel Corporation ('Armel') and its consultants, MHBC, have participated in Guelph's Municipal Comprehensive Review ('MCR') process, as well as the Draft Zoning By-law process, including meetings with City staff as well as the submission of various comment letters. Armel owns properties along Speedvale Ave West near the intersections with Elmira Road and Imperial Road. The properties are currently zoned *Service Commercial* (with site specific provisions), *Industrial* and *Corporate Business Park* (see attached figure 1). At present, the Armel lands are vacant and Armel is currently pursuing development opportunities for them.

We have reviewed the most recent Proposed Zoning By-law and associated Official Plan amendment (April 2023) and we understand that this version is intended to align with the City's updated Official Plan (OPA 80). We have also reviewed the recently released Provincial decision on OPA 80.

Our comments on the proposed Zoning By-law as it relates to the Armel parcels shown on figure 1 are provided below. Specifically, we are requesting that the City modify the proposed *Service Commercial* zone that is applied to the Armel lands to:

- 1) include the additional uses that result from the Province's modification to OPA 80, and
- 2) retain some of the as of right uses that are currently permitted in the existing *Service Commercial* zone.

Province's Decision on OPA 80

Modification 10 in the Province's decision on OPA 80 adds additional uses to the *Service Commercial* land use designation. In addition to service commercial uses and complementary uses, this designation now permits: **Office, Warehouse (entirely within a building), and repair service (entirely within a building).**

We request that the *Service Commercial* zone in the proposed Zoning By-law be revised to include these uses. In our opinion, it would be appropriate to add these uses to the *Service Commercial* zone that is applied throughout the City. However, at a minimum, Armel is requesting that these uses be included in the *Service Commercial* zone that is applied to their properties on Speedvale Ave W shown in figure 1.

Retention of Existing As of Right Uses

Under the Proposed Zoning, a Research Establishment (now Research and Development Establishment) is no longer a permitted use within the *Service Commercial* zone. Armel is requesting that the current land use permissions that permit a Research Establishment be carried over into the *Service Commercial* zone or added to the Armel lands through the site specific provisions.

The proposed Zoning By-law defines Research and Development Establishment as:

Research and development establishment means a premises which is used for scientific research, tests or investigations including prototyping and manufacturing related to research and development on site, data collection and manipulation or technical development of information, processes, products or devices for scientific application.

This use has historically been permitted within the *Service Commercial* zone and, in our opinion, the use should still be permitted within the *Service Commercial* zoned lands on Speedvale because:

- This use is similar in its form and function to the office and warehousing uses that the Province has now added to the Service Commercial land use designation;
- The use fits within the definition of the Service Commercial land use designation of the Official Plan;
- It is a type of use that provides an appropriate transition between the industrial area located on the north side of Speedvale Ave and the residential area located to the south of Speedvale Ave; and
- It would provide increased development opportunity for vacant lands within the built boundary and provide flexibility to meet future employment needs while maintaining compatibility with adjacent and nearby uses.

In conclusion, we support the City's initiative to update the Zoning By-law. In particular, the *Service Commercial* zone has become outdated as commercial trends have changed over time. The updated Zoning By-law that includes the recent Provincial direction through the approval of the Official Plan and with the additional changes we are requesting above will improve the development opportunities for existing vacant lands in this important corridor.

Yours truly,

MHBC



Dan Currie, MA, MCIP, RPP
Partner

cc : Amy Emm, Armel Corporation
Mandy Scully, Armel Corporation

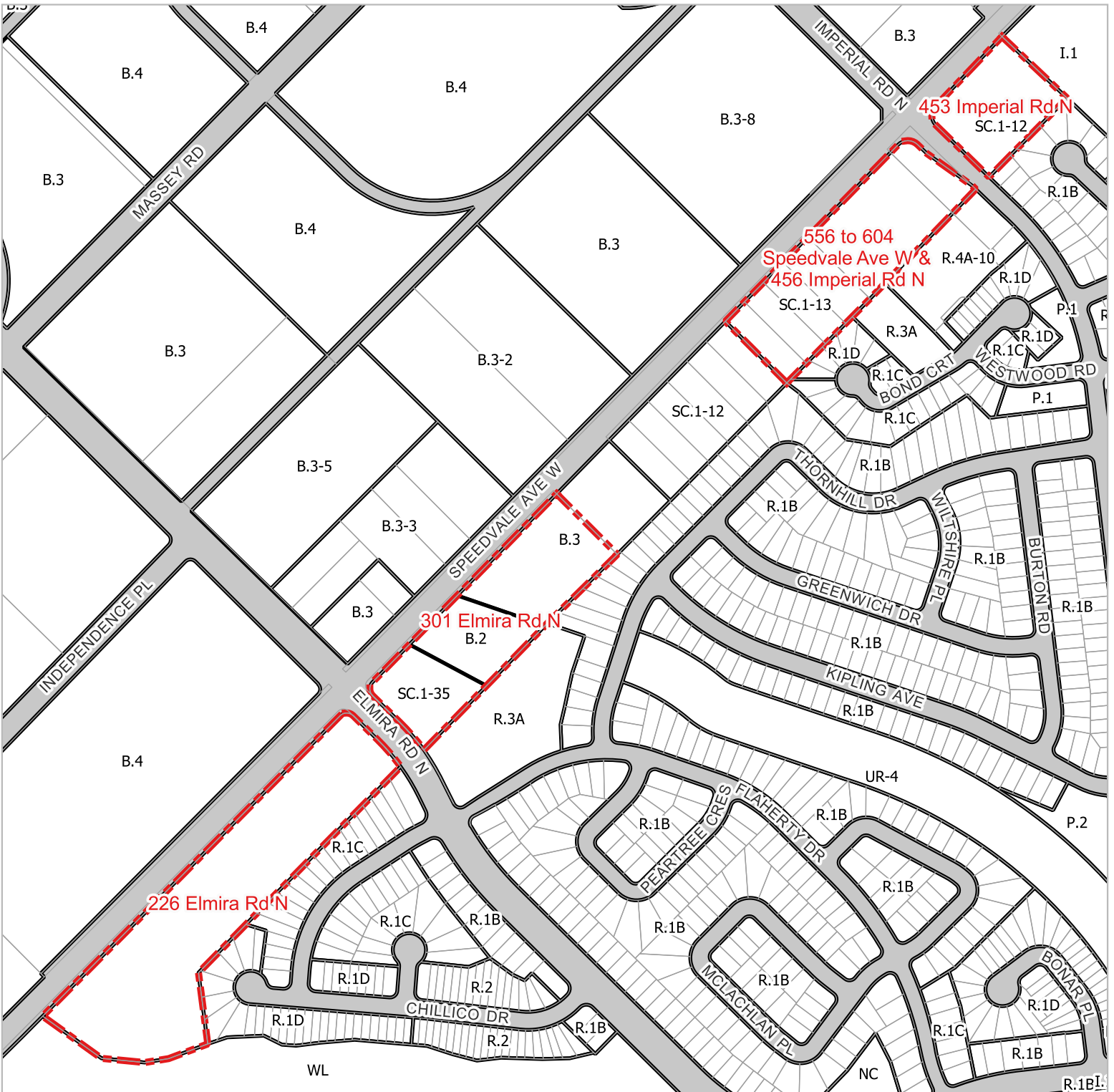



Figure 1
Existing Zoning

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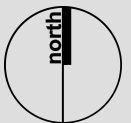
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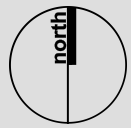
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Figure 2
Proposed Zoning
(Draft Zoning By-law)

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 Subject Lands

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