



April 13, 2023

File No. 21244

City of Guelph
Planning and Building Services
1 Carden Street
Guelph, ON
N1H 3A1

Attn: Mayor Guthrie and Members of Council

**Re: Reid's Heritage Properties
City of Guelph Comprehensive Zoning By-law (April 18, 2023),**

GSP Group Inc. on behalf of our client, Reid's Heritage Properties, the owner and developer of multiple high density and mixed-use developments throughout the City of Guelph, is pleased to submit this letter with respect to the City of Guelph's Comprehensive Zoning By-law dated April 18, 2023.

We have reviewed the latest draft of the City's Comprehensive Zoning By-law Amendment and have concerns regarding the amount of Common Amenity area requirements for higher density and mixed-use developments.

Common amenity area in the draft Comprehensive By-law "*means an amenity area which is located inside or outside a building or structure including open landscaped areas with associated recreational facilities, building rooftops, patios, terraces, above ground decks, swimming pools, tennis courts and the like, for the exclusive use of all dwelling units with the building(s).*"

Within the RL.4, RM.5, RM.6, RH.7 zones (Apartment buildings), MUC, MOC and NCC (Mixed-Use Centre), the minimum requirement for Common Amenity Area is 20 square metres per unit. This is different from private amenity that is outside of a dwelling unit and for the exclusive use of a dwelling unit (ex. balcony, terrace). For higher density and mixed-use developments, the Common Amenity Area requirement is problematic to achieve especially when surface parking areas need to be provided. Unfortunately, underground parking is not always a viable option due to financial costs and/or site constraints (ex. high water table). To achieve the required Common Amenity Area, the result will often be a reduction in the number of units to be built, which contrasts the Province's *More Homes Faster Act*.

In comparable municipalities such as Kitchener, Waterloo, London, Kingston, Oakville, Mississauga, there is no Common Amenity Area requirement, or their requirement is substantially reduced, or recognizes amenity space as a combination of shared and private space.

The requirement for Common Amenity Area at 20 square metres per unit should be reduced when you consider a development is also providing private amenity space for each of the residents/tenants.

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Furthermore, reductions should be considered when developments are located within walking distance to open space or a municipal park/trail.

By reducing the Common Amenity space requirements in the Zoning By-law, it will support higher density developments in the City of Guelph which is keeping with the intent of the policies in the Official Plan. Developers such as Reid's Heritage Properties are committed to providing well-designed and functional common spaces for their residents. Their focus is on providing functional, high-quality spaces over providing vast amount of under-used interior and exterior common areas.

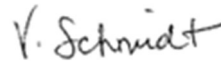
In our opinion, the proposed Common Amenity requirement for 20 square metres per unit will affect the ability the build higher density and mixed-used developments. Council and staff need to consider reducing the requirement and thus eliminate the time and delays that will be required to seek relief from this provision in the future. The Common Amenity Area requirements are no longer required within the Built-Up area of the City in the draft Comprehensive Zoning By-law. This should also be considered for those developments outside of the built boundary but within the Urban boundary.

Thank you for consideration of our comments. We would also appreciate being added to the notification list for a decision on the Comprehensive Zoning By-law.

Sincerely,
GSP Group Inc.



Hugh Handy, MCIP, RPP
Vice President



Valerie Schmidt, MCIP, RPP
Senior Planner

Cc: Melissa McGregor, RHP
Garret Bender, RHP
Clerk, City of Guelph
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