



June 9, 2025
 City of Guelph
 Planning and Building Services
 1 Carden Street
 Guelph, ON N1H 3A1
 Attn: Eric Rempel, Planner II

File No.: 24071

**Re: 105 Elmira Road North
 OPA/ ZBA Planning Public Meeting Comment Summary– OZS25-003
 Killam Apartment Subsidiary II Limited Partnership and HIP Investments Inc.**

A public meeting was held for the OPA/ZBA applications (OZS25-003), on May 13th, 2025. Below is a summary and response to the comments received from the public and council.

1. Is there a reason why underground parking is not proposed?

Response: Ownership confirmed that underground parking is not viable for the project. The technical studies submitted with the application demonstrate that the proposed parking design is appropriate for the Site.

2. Why is the access not proposed off Elmira Road North? There are concerns about the school zone and existing congestion on Willow Road.

Response: An access off Elmira Road North was originally proposed, however City Staff advised that the DEM requires a minimum distance of 100 metres for full turning movements from the Elmira Road North and Willow Road intersection. The plan was updated to provide access to the Site off Willow Road to comply with engineering requirements. The Transportation Impact Study ("TIS") has been updated to reference the school zone.

3. Is fencing proposed to block vehicular lights from the adjacent properties?

Response: Yes, opaque fencing is proposed to screen the parking along the rear and interior lot line. In addition, a Photometrics Plan will be required as part of the Site Plan Approval process that will demonstrate that the lighting will not extend past the property line.

4. Does the CMHC affordable housing definition meet the City of Guelph definition and will the development include affordable housing units?

Response: In accordance with the CMHC ALCP - a minimum of 20% of the units are required to have rents below 30% the median total income of all families in the subject market, for a minimum of 10 years. Ownership intends on exceeding this requirement.

5. Is there is a reason why a maximum density of 100 units per hectare is not proposed?

Response: The proposed density represents a modest increase that is supported by

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technical studies and maintains a built form and site design generally consistent with the zoning permissions within the existing NCC zone. The proposal reflects good land use planning by optimizing land and infrastructure, supporting compact urban form, and aligning with Provincial and City policy directions that encourage accommodating additional density where appropriate to meet the needs of the current and future population. Importantly, it enables the delivery of much needed additional purpose-built rental housing, a key priority of the province and the City of Guelph. For a detailed assessment of policy conformity, please refer to the Planning Justification Report (“PJR”).

6. Are you finding that the City of Guelph is requesting more common amenity area than other municipalities?

Response: The City of Guelph is on the high end. The PJR referenced the requirements in the City of Waterloo, the City of Toronto and the City of Brampton which are all lower than the City of Guelph. A chart was prepared and has been included within the updated submission package that compares the City of Guelph with the City of Waterloo, the City of Brantford, the City of Kitchener and the City of Stratford. In all cases the City of Guelph has a higher common amenity requirement, and the proposed common amenity rate complies with all the other Zoning By-laws.

7. Concerns were raised about traffic at the intersection due to the school and that Elmira Road North is a thoroughfare to the industrial area. How much consideration has gone into the traffic that will come and go at peak times.

Response: A TIS was submitted and concluded that 44 new trips are anticipated in the AM peak and 49 new trips are anticipated in the PM peak on typical weekdays. According to the City of Guelph guidelines a TIS is only required where more than 100 new trips are anticipated during peak hours. This development does not meet this threshold so a full study was not needed. The TIS has been updated to reference the school zone.

8. Was there consideration given to including a small commercial component to the development for added convenience for those that may not be able bodied?

Response: Yes, Ownership considered a small commercial component but determined that it was not viable for the project. A Commercial Function Study was prepared by Tate Research as required by the Official Plan that supported the removal of commercial uses on the Site. The Commercial Function Study was peer reviewed by Watson and Associates and City Staff have signed off. Regardless of whether the Site provided small scale commercial, residents would still need to access other commercial sites to meet their daily needs. Importantly, as concluded by Tate Research, the surrounding area already provides a high concentration of commercial uses, significantly exceeding the industry standard for commercial space per capita meaning additional commercial uses are not needed on this Site. This Site is best positioned to focus solely on delivering much-needed purpose built rental housing.

9. Requested clarification on the target market and suggested three-bedroom units to encourage families on the Site and noted there are families of four in the area looking for three-bedroom rentals.

The project was thoughtfully designed to serve a diverse range of tenants, recognizing that families come in many forms and live in a variety of unit sizes. While we acknowledge that some families may seek three-bedroom units, Ownership has advised that the inclusion of such units in this development would compromise its primary objective: delivering purpose built rental housing that meets CMHC affordability criteria. Further Ownership has advised that in their experience three-bedroom units do not automatically result in families renting them out, it is often groups that each rent out a room. As noted in the City of Guelph's *Housing Affordability Strategy* (December 2024), one-person households are the fastest growing household type and represent the largest share of renter households. Table 3-6 of the report further identifies the greatest affordability need is one- and two-bedroom apartments. The addition of much needed one- and two-bedroom purpose-rental housing units with an affordability component aligns with the City of Guelph housing demands and housing objectives.

10. Clarification on why common on-site amenities are proposed when there are already a great offering of amenities that existing within walking radius.

Response: On-site amenities are provided for the convenience of the tenants who do not want to leave the Site to go to the gym. Further on-site common amenities foster community and increase quality of life. We are proposing to reduce the minimum common amenity rate to reflect the abundance of community amenities within the area. Further details on this are included in the PJR and the Comment Response Matrix.

11. Question about why the Site cannot meet the zoning requirements.

Response: The proposal represents appropriate intensification and aligns with the City's planning framework by promoting compact built form, efficient use of land and infrastructure, and delivering much-needed purpose-built rental housing. All technical studies confirm the Site can accommodate the proposed development without adverse impacts.

Key highlights include:

- The proposed front yard setback exceeds the current NCC zoning minimum of 3 metres.
- The proposed landscaped open space exceeds the current NCC zoning minimum of 20%.
- Transportation and planning staff support the proposed overall parking rate.
- Angular plane adjustments are minor and result in no shadow, overlook, or privacy impacts.
- Common amenity space is appropriately scaled and programmed, reflecting resident needs and the surrounding amenity-rich context.

The *Planning Act* enables site-specific provisions through Zoning By-law Amendments. The number of provisions requested is not, in itself, an indication of appropriateness. Rather, each provision, and the entire development is to be assessed. In this case, the Supporting technical studies demonstrate that:

- The Site can be serviced with existing infrastructure.
- There are no negative impacts related to shadow, noise, or wind.

- The parking rate is appropriate and functional.
- High-quality landscaping is provided along property lines and within the Site.

The proposed development is supported by policy and technical analysis and represents good land use planning. Please refer to the PJR for additional details.

12. Comment that Council would like to see robust energy efficiency commitments laid out as part of the next submission and noted that this could be a showcase development.

Response: Ownership is committed to further exploring all options at the Site Plan Approval stage.

13. Concerns from members of the public about the scale of the development and impact on residence- traffic, noise, and privacy. Suggesting townhouses or single detached dwellings would be more appropriate.

Response: The current NCC zone permits a 6-storey mixed use development with residential uses above grade. Through the Plan of Subdivision, the Site was not designed for single detached dwellings and was not zoned to permit single detached dwellings or townhouses. The proposed Apartment Building best aligns with what is currently permitted in the NCC zone and is appropriate for the Site. The Site is located at the intersection of two arterial roads. In accordance with the city requirements there isn't enough traffic generated from this development to require a full TIS. Through the detailed analysis the engineering division requested that the TIS include reference to the school zone, which has been added. A Noise Feasibility study was completed, that concludes that the Site can be designed to comply with the required noise standards/ policies. A Detailed Noise Study is required at the Site Plan stage that will ensure that the Site is designed to comply with the noise standards/ policies. New trees and fencing are proposed along the rear and interior lot lines to provide a privacy buffer between the Site and adjacent low density uses.

14. A requested from a member of the public was received requesting that the trees along the east property line that are proposed to be removed to be removed now due to overhang and safety concerns.

Response: Ownership has no issue with exploring this. To start the process the Arborist has reached out to the City to discuss initiating that process.

Sincerely,

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