



June 20, 2024

File No. 17019

Building, Planning and Development, Town of Grand Valley
5 Main Street North
Grand Valley, Ontario
L9W 5S6

Attn: Mark Kluge, MCIP, RPP
Town Planner

**Re: Sheldon Creek Developments, 40-60 Emma Street, Grand Valley
Official Plan and Zoning By-law Amendment – Revised Submission
Planning Justification Addendum Letter**

Dear Mr. Kluge:

GSP Group (“GSP”) has been retained by Sheldon Creek Developments Inc. (the “Owner”) to assist with Official Plan and Zoning By-law Amendments for a site municipally known as 40-60 Emma Street, in Grand Valley, Ontario (“Subject Site”). The Subject Site is legally described as PLAN 22A Block 5 Part of Lot 1 and PLAN 33A, Block 5, Lots 13, 14, and 15.

The Subject Site is approximately 3,212 square metres in area, with a frontage of approximately 75 metres along Emma Street and depth of approximately 50 metres. The Subject Site is currently vacant and slopes downwards towards Emma Street.

The Subject Site is generally surrounded by a mix of uses, including residential, commercial, institutional, and light industrial uses. To the west and north are predominately single detached houses, with a Hydro One transformer station being directly to the north. To the east of the Subject Site are a mix of residential and non-residential buildings. The commercial core of Grand Valley is located walking distance to the northeast, roughly 250 metres away. To the south of the Subject Site is Barclay Trim and Mouldings, a small scale business. One property beyond this business is the site of the recently approved “Emma Grand” development by Golden Canadian Homes Inc. This is a 3 storey, 23 unit, mixed use development.

1.0 Background

Following a pre-consultation meeting with Town staff in November 2022, a Planning Justification Report was prepared as part of a Zoning By-law Amendment and Official Plan Amendment application to permit the proposed development. At this time, the proposal consisted of two, four-unit townhouses. Each townhouse block was three storeys in height with a gross floor area of approximately 771 square metres. Each unit contained three bedrooms, an attached garage, and a walkout back yard. Future

plans included separating each unit into individual parcels so the units were designed in such a way to fit the proposed RM zone.

Following a formal submission of an Official Plan Amendment and Zoning By-law Amendment in October 2023, a number of comments were received which led to the reconsideration of the built-form for the Development Site. The initial development proposed two townhouse blocks each containing 4 units. The development is being revised to a mid-rise, four storey apartment building with 18 units and 38 parking spaces (“Revised Development”).

The redesign of the Development Site has been discussed with Town planning and engineering staff and has received feedback indicating the requirement for a Planning Justification Addendum to address the previous comments from the Town and changes to the plan. The Revised Development maintains the original intent for the proposed development to include a medium density residential development that is compatible with the surrounding built-up area.

This Planning Addendum Letter is intended to address the changes to the proposed development. All other aspects of the initial 2023 Planning Justification Report still apply. This Planning Addendum Letter should be read in conjunction with the previous reports and is intended to:

- identify the revisions to the proposed development through the revised conceptual Site Plan; and,
- to provide an overview of the proposed Official Plan Amendment and Zoning By-law Amendment.

This Planning Addendum Letter should be read in conjunction with the following reports/drawings included with the resubmission and prepared in support of the proposed development:

- Architectural Plans, including a conceptual Site Plan, Elevations and Rendering, prepared by Khalsa Design Inc.;
- Environmental Noise Report (revised), prepared by Jade Acoustics;
- Geotechnical Investigation and Slope Stability Assessment, prepared by CMT Engineering Inc.;
- Landscape Concept Plan, prepared by GSP Group Inc.;
- Servicing Brief, prepared by Moorefield Excavating; and
- Site Lighting Plan, prepared by Mighton Engineering.

Further, a comment response matrix has been prepared in consultation with the project team, which is included with the submission package to outline how staff and agency comments have been addressed and/or incorporated into the revised development.

2.0 Proposed Development

A revised Site Plan has been prepared in response to staff comments which consists of a 4-storey, 18-unit apartment building. 38 parking spaces will be provided within 1 level of semi-underground parking, and exterior surface parking which will be accessed via two entrance points off Emma Street.

Stormwater Management

Stormwater management along Emma Street is currently serviced by a combination of ditches, inlets and culvert outlets which discharge to the William Street storm sewer to the south. The storm sewer on William Street was upgraded in 2013-2014 to accommodate new development on the west end of Grand Valley (i.e. Thomasfield Homes' Mayberry Hill subdivision). A new curb, gutter and storm sewer system is proposed on Emma Street to service the development.

The development will include a storm sewer system on site that is designed to accommodate 100 year storm flows in part through an onsite super pipe. Stormwater will be directed to new sewers in the Emma Street right-of-way eventually discharging to the existing William Street storm sewer.

3.0 Planning Framework

A detailed analysis of the policy framework applying to the proposed development have been included in the 2023 Planning Justification Report. Due to the minor nature of the revised proposal, much of the planning rationale remains unchanged as it relates to Provincial policy through the PPS and Growth Plan, as well as Dufferin County and Grand Valley's Official Plans. This section provides a high level overview but should be read in conjunction with the 2023 Planning Justification Report originally submitted to the Town.

2020 Planning Policy Statement ("PPS")

Much like the original proposal, the Revised Development is within the settlement area and built-up area of Grand Valley, is a compact built-form, and is in proximity to commercial uses. The proposed development will make efficient use of existing infrastructure and public services and adds to the mix and range of housing available in Grand Valley. Overall, Official Plan Amendment and Zoning By-law Amendment are consistent with the PPS.

Growth Plan for the GGH ("Growth Plan")

Similar to the findings above, the Revised Development continues to achieve the policy objectives of the Growth Plan. The proposed development will contribute to the County of Dufferin's population forecast and growth targets, the Site is within the built-up area, does not cause any environmental impacts, plans for appropriate stormwater management infrastructure, and introduces a broader range of housing forms into Grand Valley. The Official Plan Amendment and Zoning By-law Amendment conforms to the Growth Plan.

Dufferin County Official Plan (“DCOP”)

As previously discussed in the October 2023 Planning Justification Report, the Subject Applications conform with the policy framework provided by the DCOP. The Subject Site is located within the Grand Valley Urban Settlement Area and within the delineated built-up area. The Proposed Development appropriately develops the Subject Site at a scale that is sensitive to the existing area.

Town of Grand Valley Official Plan (“OP”)

As indicated on Appendix B of the OP, the Subject Site is designated as Downtown Commercial (see Figure 13). The Downtown Commercial designation generally includes commercial and service establishments within the downtown area included in the Downtown Commercial designation. Commercial, residential, institutional, and recreational uses are all permitted within this designation, with residential uses only being permitted above commercial or institutional uses.

The OPA continues to request a change to the land use designation to Urban Residential to permit the Proposed Development. The following objectives are provided for this designation:

- a. *to provide for a range of housing forms in order to meet the varied needs of existing and future residents;*
- b. *to ensure the rate of growth is appropriate for the settlement area;*
- c. *to encourage urban design that is in keeping with the character of the existing village;*
- d. *to create a compact urban area that can be serviced by municipal water and wastewater systems; and*
- e. *to encourage an adequate supply of housing for vulnerable populations*

Further, Section 5.3.4 provides the development policies for the Urban Residential land use designation, stating that “All new development within the Urban Residential designation shall be on municipal water and wastewater systems, in accordance with section 6 of [the OP].”

The Revised Development implements the objectives of the Urban Residential designation and conforms to the development policy. The apartment units contribute an underrepresented form of housing to the Town, which will maintain the character of the surrounding area. The development is compact and will efficiently use municipal services.

The Subject Applications are consistent with the policy framework provided by the OP. The Revised Development is situated on land within the built-up area in a compact form and on municipal services. The Subject Site is located within the Intensification Area, further establishing the appropriateness of redevelopment for apartment residential uses.

Urban Design and Built Form

The Revised Development is a mid-rise apartment building that is centrally situated on the Subject Site. The development will have pedestrian and two driveway accesses from Emma Street. A single-loaded surface parking lot with 18 spaces will be located in the front yard, with an additional 4 surface parking spaces to the right side of the building. The remaining 16 parking spaces will be interior to the building in a garage. The front yard will have landscaping around the surface parking lot and left side of the building. Existing mature trees in the southwest corner at the top of the embankment will be preserved.

When viewed from the Emma Street frontage, the proposed apartment building is four storeys in height, while from the rear, it will appear as three-storeys in height, adapting to the sloped nature of the existing site. The topography of the site slopes up towards the rear lot line. The overall building massing takes on a linear rectangular form, measuring 39.7 metres in length along Emma Street frontage and 21 metres in width and a building footprint of 827 square metres. The interior parking will take advantage of the existing upward slope of the Site, appearing at grade and require minimal ramping for access.

The proposed building is setback 15.25 metres from the Emma Street property. At the rear property line abutting the low-rise properties, the building maintains a setback of 12.62 metres. A side yard setback of 3.78 metres and 14.11 metres are provided to the northern and southern property lines respectively.

The architectural design proposes a contemporary expression. There are no blank facades; all elevations are detailed with glazing, articulation and a mix of materials such as brick veneer, Hardie board, horizontal siding and stone veneer. Windows and openings are regularly spaced on all elevations while balconies are proposed for all units in the building. Vertical and horizontal building articulations are demonstrated through building projections and materiality. The building entrance as seen from Emma Street frontage is highlighted by an overhead canopy and floor-to-ceiling glazed window and door openings.

The building steps back approximately 2.2 metres from the second floor onwards providing a deeper balcony space for the second-floor level and a greater separation distance to the southern property line.

Parking

The surface parking area with 22 surface parking spaces including two barrier-free parking spaces is positioned in front of the building and the remaining parking spaces are contained within the first floor of the building with a parking garage entrance located on the northern side of the building. A total of 38 parking spaces is proposed for the development.

Access, Circulation and Servicing

Pedestrian and vehicular access to the Site will be provided via two driveway entrance points off Emma Street. These driveways will also serve as emergency access and garbage collection routes for the Site. All service areas (garbage, mechanical, electrical) are within the building and will not be visible from the street. There are two deep well waste containers (i.e. Molok bins) proposed on the northeast side of the building near the entrance parking garage.

Streetscape and Landscape Design

The landscape design will contribute to improvements to the Emma Street streetscapes and around the edges of the building; landscaping on the Site is generally limited to such areas given the form and footprint of the building.

The landscape design will be integrated with the building design to ensure it does not obstruct building entrances. Landscaping will complement the existing streetscape, framing and delineating site driveway accesses through paving treatments and landscaping. To enhance the pedestrian experience, weather protection elements and strategically placed building overhangs and canopies will be incorporated across the Site. Soft landscaping and tree planting along the site edges will be proposed to further enhance the street edge and conceal undesirable views, such as utility equipment and parking.

Water-efficient and drought-resistant landscaping, including native planting materials, will be considered to promote sustainability. Retaining walls will be proposed along the building's perimeter, as indicated in the civil drawings.

Conclusion

The Revised Development's placement, scale, massing and character are compatible with the surrounding neighbourhood character. The proposed built form enhances the character of the Site, while still being respectful of the surrounding context. The design features an appropriate height and scale that defines the public realm with good proportions. The preliminary building elevations incorporate horizontal and vertical articulation, including balconies, architectural projections, roofline projections, and variation of building materials and colours, adding visual interest and breaking down the apparent mass of the building. The architectural style is contemporary, with design cues taken from the surrounding neighbourhood.

In conclusion, the Revised Development fits well within the surrounding context, offering a mid-rise form that enhances the public realm and aligns with the area's characteristics, all while increasing local density and housing options.

4.0 Zoning By-law

The Subject Site is currently zoned Downtown Commercial (“CD”) and CD(F)-3 in the Town of Grand Valley Zoning By-law. The CD zone permits a range of commercial uses, as well as apartment uses if the dwellings are above or behind a permitted non-residential use. The Flood Fringe zone overlay indicates that certain site requirements must be met, listed below.

- i. *the habitable floor space elevation of the dwelling unit shall be located above the regulatory flood level;*
- ii. *all building openings shall be above the regulatory flood level, and shall be flood proofed;*
- iii. *no basement shall be constructed;*
- iv. *mechanical, electrical, and heating equipment shall be located above the regulatory flood level; and,*
- v. *a permit shall be required in accordance with GRCA Reg. 150/06 for any development.*

Each of the above noted requirements continue to be met in the redesign of the Site. Based on the permitted uses in the CD zone, a Zoning By-law Amendment is still required to permit the Proposed Development. It is proposed that the Subject Site be rezoned to a “Specialized Multiple Residential (“RM-##”) zone. The following table outlines the provisions of this zone:

RM Zone Provision	Required	Provided
Minimum Lot Area (Interior Lot)	0.02 ha	0.32 ha
Minimum Lot Frontage (Interior Lot)	6 m	75.6m
Minimum Front Yard	7 m	15.25m
Minimum Interior Side Yard	1.2 m	3.78m
Minimum Rear Yard	6 m	12.62m
Maximum Lot Coverage	40%	25.78%
Maximum Height	12 m	13.06m
Minimum Landscaped Open Space	20%	35.5%
Maximum Density	50 units/ha	57 units/ha
General Regulations	Required	Provided
Parking Space Dimensions	3m x 6m	3m x 6m
Accessible Parking Space Dimensions	Type A: 3.4m x 6m Type B: 3m x 6m Aisle width: 1.5m	A: 3.4m x 6m B: 3m x 6m 1.5m aisle
Number of Spaces Required	2 spaces/unit = 36	38

5.0 Subject Application Rationale

Official Plan Amendment

A land use designation change from the Downtown Commercial to Urban Residential designation is required as the Downtown Commercial designation does not permit stand alone residential uses. As directed by the OP, this is to maintain the character of the Downtown Commercial Core.

The Subject Site is on the periphery of the area designated Downtown Commercial, and is currently vacant. The development of the Subject Site for an apartment building would not compromise the character of the Downtown Commercial core, which is primarily located along Water Street to the east and north of the Subject Site. Further, Emma Street does not currently feature the small-scale or granular commercial offerings of a Downtown Commercial area. Additionally, as the Subject Site is currently vacant, no commercial or retail uses are being removed from the current commercial supply. The Proposed Development will support the commercial uses of the Downtown Commercial Core by increasing the existing customer base in proximity to the commercial uses.

Adjacent to the north of the Subject Site is a fenced Hydro One transformer station. It is not anticipated that there are any land use compatibility concerns with this adjacent use. The Environmental Noise Report does not indicate that the transformer will be a noise concern. This is further demonstrated through the existing residential uses adjacent to the transformer property. In reviewing the setback information available from Hydro One, the power lines along Emma Street must be 4.8 metres away from any building, which is achieved by the Proposed Development.

The PPS, Growth Plan, DCOP, and OP all direct for compact built forms and residential intensification within settlement areas and the built-up area, that efficiently use existing municipal services and contributes to the range of housing available in the Town. The Proposed Development is consistent and in conformity with these policies.

Zoning By-law Amendment

A zone change from the Downtown Commercial (DC) and Downtown Commercial Flood Fringe (DC(F)-3 to the Specialized Multiple Residential (RM-XX) Zone and Specialized Multiple Residential Flood Fringe Zone (RM-x(F)-3 implements the Subject OPA. The RM zone is the only zone that permits apartments, and as such is the zone that implements the Proposed Development. The Proposed Development is compatible with the existing character of the surrounding area, which is one in transition. With the approval of the 3-storey building to the south, compact built forms are coming to the area. The proposed 4-storey apartment will act as a modest transition to the surrounding apartment, and single detached homes nearby and will contribute towards the lack of attached housing forms in the Town. The Flood Fringe (F) will be maintained where applicable. Specialized regulations are proposed to facilitate the development and are required for the following regulations:

1. Maximum building height
2. Maximum density

Maximum Building Height

The Revised Development includes a request for a specialized regulation to permit a maximum building height of 13.5m whereas the zone typically permits a building height of up to 12m. Height (of Buildings or Structures) is defined in Grand Valley's Zoning By-law as "*The vertical distance measured between the average natural or finished grade at the front of the building, and the highest point of the roof surface*".

The request for increased height stems from a number of site-specific challenges and opportunities which can be overcome and taken advantage of by the increased building height. The grading of the Site has presented some challenges as it relates to the design of the building. As shown on the grading plan in the Servicing Brief, the Site slopes from back to front approximately 10m and approximately 5m along the frontage of the Site. The increased building height allows the Proposed Development to work with existing grades while maintaining a functional apartment building.

15 parking spaces are proposed under the building. Covered parking spaces are typically preferred for residents. The covered parking allows for the building to work with the grading of the Site and maintain adequate window sizes for the residential units above.

Overall, the increase in building height is minor and results in a functional apartment building that respects existing neighboring grades, provides for covered parking, and facilitates the development of residential units close to the Commercial Core of Grand Valley. The increased building height is consistent with the policies of Grand Valley's Official Plan, and the Provincial Policy Statement, and conforms to the Growth Plan policies.

Maximum Density

The increased density from 50 units per hectare to 57 unit per hectare represents a modest intensification of the land on a property that is near the Commercial Core of Grand Valley. The Proposed Development will introduce much needed housing stock to the Town in an area that will benefit from the increase in population. The increased density is in line with the Official Plan's Growth Management policies in that it exceeds the minimum of 44 units per hectare, respects existing neighbours, and is compatible with surrounding land uses.

The increase in density is consistent with the PPS, conforms to the Growth Plan and applicable policies of the DCOP and Grand Valley's Official Plan.

6.0 Supporting Studies

Servicing Brief

The Servicing brief confirms that full and adequate municipal services can be made available and provided for the proposed development. This includes water, sanitary sewer and stormwater management on-site and by extending a municipal storm sewer to Emma Street. Sufficient water services and pressure will also be provided for fire suppression.

Erosion and sediment controls will be implemented during and post-construction to limit sediments entering the Grand River. Full vehicular access will be provided by two driveways to Emma Street and will be subject to the Town's standards and approval.

Environmental Noise

The revised Environmental Noise Report by Jade Acoustics found that with appropriate exterior wall and window design, sound levels are predicted to fall within appropriate Town and Ministry noise criteria. Standard noise warning clauses would also be required for residents.

A detailed noise report will be required and prepared when a final site plan is submitted.

Geotechnical and Slope Stability

The native soils and approved fill materials were considered to be suitable for backfilling for the proposed building. During construction, the subgrade should be sloped and ditched to a sump outside the building footprint for adequate dewatering and drainage. Once excavation occurs, the foundation formwork should occur immediately after to protect the founding soils.

The proposed slope on the site was determined to be stable from erosion using the proposed building construction methods (i.e. cast in place concrete) including retaining walls and the grading plan.

Environmental Site Assessment

No revisions were made or required to the Phase 1 Environmental Site Assessment from the initial application submission.

7.0 Conclusion

GSP Group Inc. has been retained by Sheldon Creek Developments to coordinate and prepare the submission of a Planning Justification Report for Official Plan Amendment and Zoning By-law Amendment applications for 40-60 Emma Street. The Subject Applications are necessary to permit the redevelopment of property for a 4-storey, 18-unit apartment building.

This Planning Justification Letter concludes that the revised Official Plan Amendment and Zoning By-law Amendment applications are appropriate and represents good planning for the following reasons:

- They are consistent with the policies of the Provincial Policy Statement (2020);
- They conform to the policies of the Growth Plan for the Greater Golden Horseshoe;
- They conform with the policies of the County of Dufferin Official Plan;
- They conform with the intent of the Town of Grand Valley Official Plan;
- The Revised Development will provide for the redevelopment of an under-utilized site within the built-up area of Grand Valley;
- The Subject Site can be fully serviced through proposed service connections to the existing sanitary and water networks;
- The technical work provided as part of this application indicate the Subject Site is suitable for safe development; and,
- Approval of the Subject Applications will permit development that is appropriate and compatible with the surrounding context and contribute to the range of housing options available in the Town.

It is therefore our opinion that the revised Subject Applications are appropriate, represent good planning, and should be approved.

Sincerely,
GSP Group Inc.

A handwritten signature in cursive script, appearing to read "Charlotte Lewington".

Charlotte Lewington, RPP, MCIP
Planner