



March 19, 2024

Spencer Skidmore
Area Planning Manager – East Team
City of Hamilton
71 Main Street West, 5th Floor
Hamilton, ON, L8P 4Y5

Dear Spencer:

**Re: *Submission of Revised Materials for Draft Plan of Subdivision
Response to Comments – Planning/Urban Design Response
City File No. 25T – 202305
75 Centennial Parkway North, Hamilton***

As you are aware, Bousfields Inc. is the planning consultant for **Hammer GP LP and Hammer GP Services Corporation**, the owners of the lands municipally known as 75 Centennial Parkway North in the City of Hamilton (the “Site” or “Subject Site”). The Subject Site is located at the northwest corner of Centennial Parkway North and Queenston Road and contains an existing shopping centre (known as Eastgate Square), extensive surface parking areas, and a Hamilton Street Railway (“HSR”) bus loop located along Queenston Road.

1. BACKGROUND

On August 3, 2023, a submission for a Draft Plan of Subdivision (“DPOS”) Application with supporting documentation was filed, which proposed ten (10) residential and mixed-use development blocks, three (3) public park blocks with a total parkland area of 0.968 hectares, a new 20.0 metre wide east-west public road through the site, and multiple road widening blocks. The application also proposed the retention of a large portion of the existing shopping centre. To accompany the DPOS, a concept plan was prepared to demonstrate how the proposal could function within the proposed blocks and to demonstrate conformity with the applicable Official Plan and Secondary Plan policies and compliance with the applicable Zoning By-law regulations. The DPOS application was deemed complete by the City of Hamilton on September 5, 2023.

In addition, requests for Formal Consultations to advance the Site Plan Control Applications for first two (2) phases of the development, including Blocks B, C, F, K, L and M were filed on October 12, 2023, and the Formal Consultation meeting took place on December 20, 2023.

2. REVISED PROPOSAL

Following the submission of the initial DPOS application, comments from various City departments and agencies were received. We have been working closely with City staff since that time to review and address these comments. Based on numerous discussions with City staff, the application has been revised, and the updated materials are enclosed with this submission. Key revisions to the initial plans include:

- Reorientation of the proposed Street 'A' public road in response to transportation planning comments to offset public road from Lady Court;
- Reconfiguration of the townhouse blocks in Blocks B and C resulting from the revised public road layout;
- Delineation of a new Block D to separate it from the mall block (this now includes a "Block D North" and a "Block D South");
- Minor modification to the delineation of Blocks E and F to accommodate changes to the bus terminal below;
- Further changes to the proposed HSR terminal to increase the bus capacity to ten bays and accommodation for articulated busses for HSR's express route busses, while delivering an integrated station design consistent with HSR and LRT design parameters;
- A new private road extension to the north of Street 'A' connecting to Centennial Parkway to the east across from Vineyard Road;
- Revisions to the internal private road network and drop-off locations in accordance with the revised block forms and in response to comments from transportation planning;
- Reconfiguration of the massing and loading associated with Block L.

3. RESPONSE TO COMMENTS

The above-noted revisions are based on comments received from City departments and commenting agencies. An itemized response to each comment received is provided in a separate "Response to Comment Matrix". Below is a summary of comments received from key departments and agencies, and an overview of how these comments are being addressed with the current resubmission and revised materials.

3.1 Transportation

Comments from Transportation Planning staff were received on November 24, 2023. Transportation staff were not in support of the proposed Street 'A' connection to Kenora Avenue opposite Lady Court. In this regard, they requested that the location for this connection be modified to be offset from Lady Court.

The Owner and their consultant team have worked extensively with Transportation Planning staff to address the comments in a collaborative manner. As agreed upon by City staff, the intersection of Street “A” with Kenora Avenue has been shifted south to no longer align with Lady Court. Traffic calming measures are recommended along Kenora Avenue and Kentley Avenue to reduce the potential for neighbourhood traffic infiltration and minimize impacts to existing neighbourhood residents. This intersection is no longer proposed as a signalized intersection and now proposed a 3-legged stop control intersection, as requested by City staff, although it is our opinion based on the input from LEA, a signalized intersection would be more appropriate over the medium-term. Other detailed modifications have been made to the concept plan in response to transportation planning staff’s comments as it relates to vehicle access, pick-up-/drop-off areas and loading areas for the proposed development blocks and portion of the mall to remain.

In response to these comments, LEA Consulting Ltd., has provided a revised Transportation Impact Study.

3.2 Hamilton Street Railway (“HSR”)

Comments from HSR staff were received on November 15, 2023, and additional comments were received on December 11, 2023.

The comments from HSR were primarily concerned with:

- bus routing throughout the internal private road network;
- bus ingress and egress to the proposed HSR terminal being forward motion-only;
- the interface with future LRT operations on Queenston Road;
- the number of bus bays provided (HSR requested at least 6 bays for standard buses, and an additional 2 for accordion buses, for a total of 8 bus bays);
- pedestrian safety and crosswalks, signage and signaling, and customer shelter and weather protection for outdoor bus bays.

In addition to the November and December 2023 written comments, verbal comments were provided from HSR staff that 10-12 bus bays could potentially be required in the future to accommodate expected growth in bus service.

In response to comments received, the concept plan has been revised to include ten (10) bus bays within the proposed transit terminal including two (2) bays specifically designed to accommodate the articulated busses used for HSR’s express routes. Buses will travel in a forward-only motion (no reversing), entering via a driveway

connection to Kenora Avenue and exiting using the existing mall signalized access on Queenston Road.

The proposed express bus route has also been modified in response to HSR comments to enter the transit terminal using the proposed bus access off Kenora Avenue and exit directly onto Queenston Road, where they can then head east towards Centennial Parkway, eliminating the previous routing through the eastern portion of the subject site. as shown in **Figure 1** below (Figure 9-2 from the March 2024 LEA Transportation Impact Study). The station and proposed road network have been designed to accommodate all required bus movements at the intersections of Kenora Avenue and Queenston Road as well as the existing mid-block signalized intersection along Queenston Road.

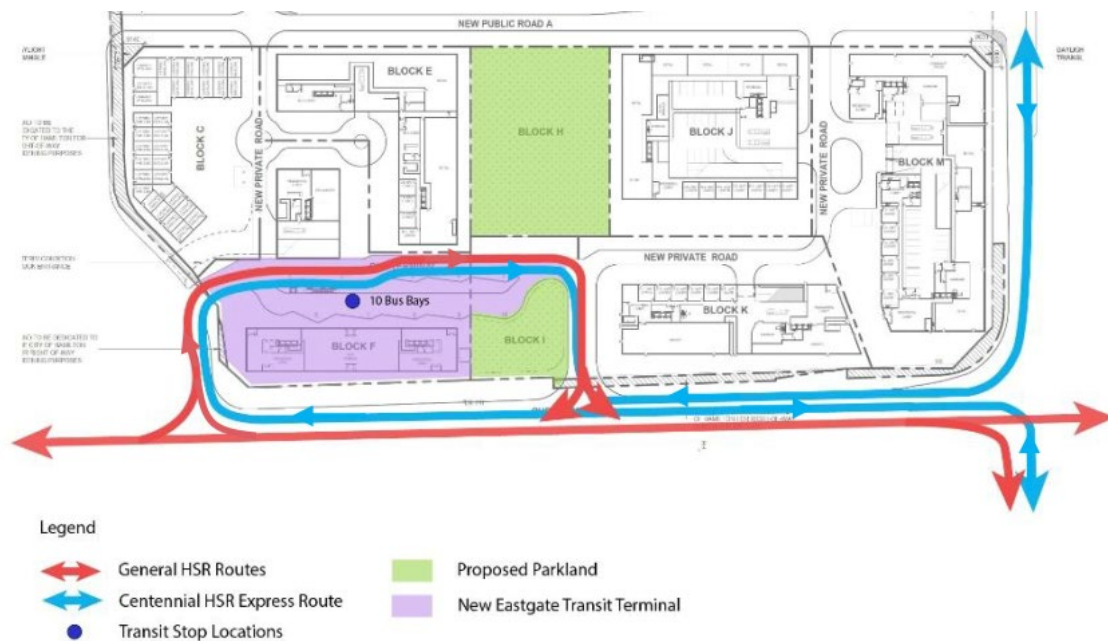


Figure 1: Transit Circulation Diagram. Source: Figure 9-2 from March 2024 LEA Transportation Impact Study.

With respect to pedestrian safety, the proposed transit terminal will be accessible from all directions for pedestrians using the public sidewalks along Kenora Avenue and Queenston Road and the adjacent public park Block I.

HSR expressed a strong desire to minimize potential conflicts between busses and pedestrians. In response to this, the bus terminal design was modified to provide elevators and stairwells to connect passengers to the northern bus bays. In addition, a single consolidated pedestrian crossing is proposed to connect Park Block I with the park block to the north which will limit pedestrian movement to one clearly demarcated

location. Sign and lighting details for this intersection will be determined through the Site Plan Control approval process.

Additional details for the bus terminal such as fencing, landscaping, and signage will be determined through the Site Plan Control application process for Block F but the revised concept plan and supporting material provided by LEA demonstrates that the proposed integrated bus terminal: is functional from a transportation perspective while prioritizing pedestrian and passenger safety; can accommodate the number of bus bays requested by HSR in the base of a mixed-use building; offers a high-quality solution for HSR which accommodates meaningful future growth expected for the HSR network; and offers seamless integration with the LRT station on Queenston Road, delivering an integrated, pedestrian-friendly passenger-orientated solution across multiple modes of transport.

3.3 Metrolinx and Widening Requested Along Queenston Road

Comments from Metrolinx staff were received on November 15, 2023, about the proposed LRT terminus station on Queenston Road. The eastern end of the LRT is proposed within the right-of-way of Queenston Road adjacent to the Subject Site.

The comments from Metrolinx were primarily concerned with the property requirements for the proposed LRT, the location of public and private utilities, public realm and streetscaping, and grade changes. In this regard, Metrolinx indicated in their written comments that property acquisition is required to accommodate a road widening for the LRT along the north side of Queenston Road in the range of 1.0 to 5.0 metres and that appropriate space for grading and streetscaping must be provided within the right-of-way. Verbal comments were received from Metrolinx staff that the property acquisition requirements may be more than previously indicated given station design is currently at approximately 10%.

In addition to the Metrolinx comments, City Transportation Planning Staff requested a widening along Queenston Road to accommodate a future right-of-way width of 45.720 metres. Despite the segment of Queenston Road adjacent to the subject site identified in Schedule C-2 of the Urban Hamilton Official Plan (“UHOP”) which states the planned right-of-way width is 36.576 m, staff quoted Vol. 1 Policy C.4.5.6.7 of the UHOP to justify the request for additional land. Policy C.4.5.6.7 states:

“...There may also be additional requirements for rights-of-way to provide lands for environmental considerations, the construction of bridges, overpasses, earth filled ramps, grade separations, depressed sections of roads, pathways, roundabouts, traffic control and transit priority measures, *including priority transit corridors, higher order transit lanes and/or stations* in accordance with Section

C.4.5.7. Any such additional right-of-way requirements shall be determined at the time of design of the road facilities and shall become part of the total required right-of-way.”

The Owner and their consultant team have met with Metrolinx on several occasions, and we have been told that an updated preliminary design will be provided soon, however, this remains outstanding.

We recognize that Metrolinx is in the early stages of detailed design for the proposed LRT station but based on the preliminary drawings provided to us by Metrolinx to-date, it is our opinion, the proposed building and underground parking setbacks proposed along Queenston Road can accommodate the LRT within the ultimate right-of-way of 36.576 metres as contemplated in Schedule C-2, particularly given the Owner’s willingness to design and deliver an integrated station providing safe and seamless access for both LRT and HSR passengers across both modes into and out of the new station.

The revised Draft Plan of Subdivision illustrates a road widening along Queenston to satisfy the planned 35.576 m right-of-way width. Once we receive Metrolinx design, the Site Plan Control application can illustrate a further building setback along the relevant portion of Queenston Road (both above and below grade of up to 5.0 m, as per Metrolinx comments). However, in our opinion, the owner is not required to dedicate these lands; if Metrolinx needs additional lands, it must purchase them from the owner at fair market value, if necessary.

Further, with regards to servicing, Metrolinx requested that no new servicing connections be provided from Queenston Road to minimize potential future interruptions and impacts on LRT service in the instance repairs or access to these servicing connections are needed. Based on these comments, the enclosed revised Functional Servicing Report and preliminary servicing plan from Lithos demonstrates that the various development blocks can be feasibly serviced without proposing new connections along Queenston Road. Details on the exact location of new servicing connections and required easements will be determined through the Site Plan Control application process.

3.4 Urban Design

Comments from Urban Design staff were received on November 24, 2023. On December 8, 2023, we provided preliminary responses to each of the comments received from Urban Design staff via email and met with Urban Design and Planning

staff. A summary of the urban design comments as well as our responses are provided below:

3.4.1 Master Plan Comments

- *Staff recommend following directions from the Secondary Plan to establish a site-wide master plan establishing a long-term vision for how it will evolve and is expected to function in its context. The concept plan for the full site should be provided with a framework for streets and blocks and open space showing the final resolution of the mall.*
- *During the interim phases of redevelopment, the existing mall parking lot and building should employ sustainable design practices to include tree planting, permeable pavers, stormwater retention and green roofs. A phasing plan should be added to the Urban Design Report.*
- *If the mall in Block A is going to be kept in perpetuity than the surface parking lot surrounding the mall should be upgraded to employ sustainable design practices to include tree planting, permeable pavers, planted parking islands, stormwater retention and green roofs to be implements at site plan for the block. Also, a portion of the roof should be upgraded with a green roof or photovoltaics. Please provide this update in the Urban Design Report and Concept Plan which will be implemented through the Block A site plan.*

Our Response:

- Policy 6.7.18.6 of the Secondary Plan states that p) recognizes that a portion of the subject site could change, and it requires a concept plan that identifies how the area of development can be developed in accordance with the vision and directions of the secondary plan. In our opinion, the Urban Design, Public Realm and Built Form report (the “UD Report”) submitted with the application demonstrates how the proposed development maintains a significant portion of the mall and its planned commercial function. It shows the transition from a car-oriented centre to a mixed-use transit supportive neighbourhood.
- The UD Report provides a concept plan for the entire site and the diagrams illustrate how the development fits with the remainder of the mall lands. It also provides an illustration of how the entire site can develop over time.
- There are no policies in the UHOP, Secondary Plan, or as-of-right zoning by-law that require the portion of the site that will not be developed to employ sustainable design practices. Although the owner will consider more sustainable building elements during the proposed renovation of the existing mall, these are not required as part of the DPOS application.
- The application before the City is a DPOS and, as such, the City’s authority regarding criteria and conditions for draft plans do not require such upgrades (see subsections 51(24) and (25) of the *Planning Act*). In our opinion, the City

does not have the authority to require these significant and expensive upgrades.

3.4.2 Gateway Comments

- *Queenston Road and Centennial Parkway are streetscape improvement areas as indicated in the secondary plan and the public realm is to be improved with sidewalk upgrades and street tree planting. Building setbacks will need to be provided to accommodate the street trees and canopies on the building frontages.*
- *Building blocks should be limited to 70 meters or less.*
- *Divide the corner building Block M into two blocks to make a better connection between the corner, the park, and the mall.*
- *Open the viewsheds and pedestrian connections from the south-east corner of the site to public park and the mall, to help direct and orient pedestrians to the mall entrance. A series of amenity areas and open spaces should lead pedestrians to the park and the mall from the SE intersection.*

Our Response:

- The proposed development includes road widenings along a portion of Queenston Road and Centennial Road as per the UHOP requirements. The City and Metrolinx will design the streetscape improvements of Queenston Road as part of the LRT project. If there are additional requirements of the applicant to improve either of the streetscapes it should be included as a condition of approval. However, we are not aware of anything that requires the applicant to provide any of these improvements as part of the application.
- Regarding the building setbacks, as noted, the subject application is for a DPOS. The zoning by-law regulates the building setback to the street and the concept plans have been prepared in accordance and compliance with the zoning By-law. In any event, these items are more appropriately dealt with at the required Site Plan Control application stage.
- Similarly, the building lengths and breaking up of buildings should be addressed at the required Site Plan Control application stage. Nonetheless, it is our understanding that there are no applicable policies, zoning regulations or guidelines that apply to this site that would limit the length of a podium building to 70 metres.

3.4.3 Towers and Blocks Comments

- *Hamilton's Tall buildings Guidelines recommend a tower separation of 25 sm. Within the city hierarchy the downtown is the highest density community. The*

Eastgate Square site is a sub-regional service center and should be less intense in density and built form than downtown.

- *The number of proposed towers for a location outside of downtown is excessive and there are an excessive number of towers proposed directly adjacent to the park blocks.*
- *Towers and building form are proposed near the parkland dedication including Block H, I and J as per the concept plan.*
- *Fewer Towers should be proposed to open the sky view and towers should be located away from the park to avoid shadow impacts.*
- *A tower separation of 40 meters or greater is recommended and the Urban Design Study should be updated to reflect an increased tower separation.*
- *All building blocks should be limited to 70 meters or less. To prevent the construction of lengthy buildings with plain facades, divide these blocks and introduce pedestrian mews between them. Additionally, ensure that well-placed lighting and windows are incorporated at every corner to eliminate potential safety concerns on pathways.*
- *Provide dimensions of the block lengths and tower separations on the next concept plan submission.*
- *Within Block A the proposed two tower and podium blocks must be separated and provided within their own blocks separate from the mall. Circulation must be provided around these blocks.*

Our Response:

- We are extremely concerned with these comments. The subject site is a key intensification area that is planned and, most importantly, zoned to accommodate high-density uses and tall buildings. The proposed concept plan has been designed to implement the as-of-right zoning, which was initiated and approved by the City.
- The statement that “*the number of proposed towers for a location outside of downtown is excessive and there are an excessive number of towers proposed directly adjacent to the park blocks*” is inappropriate for a number of reasons including:
 - In a planning policy context such as this that seeks to optimize density in a location that is supported by higher-order transit, the redevelopment of the subject site is required to optimize urban land in a strategic growth area. The subject application and concept plan do this in a manner which is compliant with the as-of-right zoning.
 - This statement would undermine the significant efforts and leadership of the City to advance the secondary plan and zoning for this area, which allows for all of the proposed towers and runs contrary to the in-effect zoning which emerged from the public consultation and planning work.

- If there was a desire to limit the amount of towers or create additional performance criteria regarding the location of towers in close proximity to a park, the City would have done so through the secondary plan and zoning that applies to the site. In our opinion, the proposed development is not excessive and instead the proposed development delivers high-quality, well-designed, and defined public and private realms in a manner that complies with the in-effect zoning and achieves a number of planning and city-building objectives.
 - In our opinion, the materials provided with the initial DPOS application, and the materials provided through the enclosed resubmission goes beyond the typical design requirements at this stage of the application to demonstrate, thoughtfully, the overall and long-term vision for the site.
- At the request of staff, although not identified as a requirement through the Formal Consultation stage, a shadow study was prepared to assess the proposed shadows on the public park blocks. This shadow study is enclosed with the submission of the revised material.
 - In addition, we have prepared an appendix to the Urban Design, Public Realm and built Form Report, which will provide additional design criteria for the subject site. The intension of this document is to create a framework for detailed design guidelines, which will be required as a condition of draft plan approval.
 - It is our understanding that there are no applicable policies, zoning regulations or guidelines that apply to this site that would require a 40 m tower separation limit or a building length of 70 metres. These comments and requests are not based on any in-effect policies, zoning regulations or guidelines that apply to the site and in our opinion, are completely inappropriate.
 - We disagree with the comments that new towers need to be separated from the mall building and why “*circulation must be provided around these blocks*”. There are numerous examples across Ontario where towers are connected to shopping malls.
 - Finally – the DPOS provides detailed dimensions of all of the blocks and demonstrates that each proposed development block can function and be serviced from an engineering and transportation perspective. Details regarding the development of each block will be provided as part of the required future Site Plan Control applications.

3.4.4 Parks and Open Space Comments

- *Three separate park blocks are proposed for Block G and Block I. Urban Design staff recommend a re-oriented public street to create a larger single public park that has more exposure to the public road frontage.*

- *Establish a secure pedestrian network that interconnects all public spaces and parks, with a clear emphasis on pedestrian safety in areas shared with vehicular traffic. Employ various design elements, such as altering pavement materials, reducing vehicle access points to control speeds, and minimizing the number of intersections.-Incorporate public art and cultural elements to enrich the community's identity and character.-It is recommended to establish a central park and design its connection to Centennial Parkway and Highway 8 in a way that encourages people to visit and enjoy the area and has a larger presence within the site.*
- *We strongly support the inclusion of large, mature shade trees within the park's landscape design and the underground parking below the park will make this not possible.*
- *For areas within the park, such as gathering spaces or event zones, where natural tree cover may be limited, we propose the use of shade structures and permeable paving.*
- *The procurement and design process for the park space needs to be established through collaboration with city staff.*
- *The proposed parking under the park blocks is a significant concern for the following reasons:*
 - *Mature tree growth is not possible due maintenance requirements of the parking membrane every 20 years.*
 - *Fire exit stairs from the underground parking to the park space is not desirable and will encumber the public space.*
 - *Maintenance concerns from parking exit stairs and walkways within the park space may interrupt programming potential.*
 - *Vents from underground parking are not desirable and will encumber the park and potentially disrupt planting and pedestrian areas.*

Our Response:

- We appreciate the comments regarding the organization of the parks on the site. However, it's important to acknowledge that LRT is planned across Queenston Road and a bus terminal at the terminus of the LRT (at the corner of Kenora) and to create a seamless integration of different modes of transit (LRT and bus), buses will need to circulate through the site.
- There is an intention (as outlined in the UD Report) to create a strong north-south park/open space that will create a visual connection to the mall and allow for a significant amount of outdoor amenity (0.968 ha/2.4 acres).
- The intention is to work with the transportation and UD teams to ensure safe connectivity, the details of which will be confirmed through the required site plan application processes.
- Regarding staff's concerns regarding the ability for mature tree and vegetative growth, there are design options to address the City's comments.

These options, as discussed on a preliminary basis with City staff, include modular construction options to allow established vegetation to be maintained during repairs and construction, additional setbacks to the proposed underground parking, and the planting of species with a limited life cycle so when the time comes to conduct maintenance or replace the membrane, these plantings would need to be replaced regardless. The Owner's consultant team of architects and landscape architects have worked on successful stratified uses where impact on vegetation and mature trees was minimized during times of membrane repair employing the above-noted design options.

- In our opinion, the City's concerns related to the long-term viability of vegetation and long-term life cycle repair and maintenance costs can be addressed through reasonable conditions of Draft Approval. During the clearance of such conditions, the scope and details of an agreement with the City would be worked out.

3.4.5 Landscape Area Comments

- *Podium level outdoor amenity area has been proposed for the high-density blocks.*
- *Additional ground level landscape area should be provided for each of the development blocks.*
- *The sun shadow study needs to demonstrate the outdoor amenity spaces are not impacted by sun shadow.*

Our Response:

- The proposal has been designed to comply with the in-force and as-of-right zoning by-law, which does not require ground level landscape areas. However, the Urban Design, Public Realm and Built Form Report does show the development of significant green space and landscaping options at multiple levels of built form, including podium and roof areas, all of which are intended to create an attractive and comfortable environment.
- Through the required site plan application process, we will work with the City to confirm site organization and ultimate design of each block. The draft plan process is instead intended to divide the site into blocks and deliver a new public street and parks to the City.

3.4.6 Transition Comments

- *There should be more stepping down from the residential neighbourhood along Kenora Ave.*

- *Although height designations go from 20 to 3 in the Secondary Plan the intent is that there should be a more gradual transition from tall buildings to the adjacent neighbourhoods. An interstitial layer of mid-rise buildings is recommended between the proposed towers and townhouses.*
- *There should be more stepping from 3 to 8 -12 to 20.*

Our Response:

- Similar to other comments above, the in-force zoning by-law and the site-specific exception provides clear direction with respect to transition in building height through the delineation of zones and required setbacks for buildings over a certain height.
- Through the site plan application process, we can review the detailed built form impacts. However, an arbitrary “interstitial layer” of mid-rise buildings is not required by any in-force applicable policy, guideline or performance standard and in our opinion the proposed concept plan demonstrates an appropriate level of transition between the existing low-rise residential to the west, the proposed 3-storey multiple dwellings along Kenora Avenue and the proposed centrally-located towers.

3.4.7 Active Frontage Comments

- *Active commercial frontage should be provided along Queenston Rd and Centennial Parkway as they are identified as pedestrian focus streets in the secondary plan.*
- *Blocks L, M, K, and F must provide retail commercial with active frontage at grade facing Centennial Parkway and Queenston Road.*
- *More retail and commercial at grade should be provided for all the tower blocks.*
- *There should be additional commercial uses such as office above the ground floor for the blocks along Centennial Parkway and Queenston Road.*

Our Response:

- The enclosed ground floor plan shows conceptual locations for retail and community uses along the entire Centennial Parkway North frontage as well as a combination of retail, bus terminal, residential lobby, public park, and a limited amount of residential amenity space along the entire Queenston Road frontage. These uses will provide an animated public realm along both “pedestrian focus” streets.
- The proposed locations of the ground floor retail/commercial in the remainder of the blocks that do not have frontage on Centennial Parkway North or Queenston Road are conceptual and based on transportation and market

viability considerations. Details will be determined through the Site Plan Control application process.

3.4.8 Streets and Kenora Avenue Comments

- *The public street, as proposed, will likely pull a significant amount of traffic to Kenora Ave, which is expected to evolve as a green, low traffic, pedestrian-oriented neighborhood street.*
- *Consider jogging the street and diverting its access closer to Queenston Rd.*
- *Please reference Urban Design Staff Alternative Concept Plans for a recommended street orientation.*
- *The orientation of the public street should not connect all vehicle traffic to Kenora Ave. but should be oriented to move traffic from Queenston Road to Centennial Parkway please refer to the Alternate Concept Plan provided by Urban Design Staff.*
- *On-street parking and modest drop-off areas should be provided along the street fronting the new mall entrance, for short-term use.*
- *Large turn around loops and drop-offs should be provided with through streets with parallel parking and drop-offs preferred.*
- *Kenora Ave. is indicated as a neighbourhood greenway in the Centennial Neighbourhoods Secondary Plan*
- *The public realm is planned to be improved.*
- *Please demonstrate additional new boulevard and street tree planting on Kenora Ave.*
- *Please consult with Transportation Planning and the City's LRT office on the planned ROW streetscaping for Queenston Rd and Centennial Parkway N and ensure the masterplan integrates the redevelopment with these new streetscapes in terms of facilities, interfaces, and connections.*

Our Response:

- There is no information or study to rationalize any of alternative concepts prepared by staff. In our opinion, it is inappropriate for staff propose a change that is not rationalized or supported by technical data including but not limited to transportation planning, noise, or servicing.
- A TIS was included in our submission, including a revised TIS in the enclosed materials, to demonstrate and rationalize the proposed road pattern. Through discussions with Transportation Planning staff, changes to the public road configuration were agreed on as well as additional traffic calming measures along Kenora Avenue. Revised material and analyses are provided in the reports and analysis provided by LEA.
- The concept plan and ground floor plan have been prepared based on a coordinated effort with the architect, transportation consultant, planner, and

civil engineering to ensure parking access, pick-up/drop-off areas, and loading are functional and accounted for. Details for each block will be dealt with through the Site Plan Control application process.

- The draft plan provides the required road widenings and through the conditions of approval, any upgrades to roads will be confirmed with public works staff.

3.4.9 Pedestrian and Bike Circulation Comments

- *Designing pedestrian-friendly streetscapes involves wide sidewalks, clearly marked crosswalks, seating options, shaded street trees, and amenities.*
- *improve the bike and pedestrian circulation diagrams in the Urban Design Report by breaking up the blocks and creating more permeability to Queenston Rd. and Centennial Parkway.*
- *It is important to establish a well-connected network of bike lanes that seamlessly links significant landmarks and destinations. This network should prioritize safe and secure bike parking facilities. Please include bike circulation and bike parking in the Urban Design Report and show its relationship with the city bike network. LRT and HSR Bus Terminal.*
- *Better integration between the terminal, LRT and improvements to pedestrian traffic flow are needed.*
- *The prominence of the terminal is important. The prominence of the bus terminal should be emphasized within the block from a massing and design perspective.*
- *Facilitate access to public transportation, including the bus terminal and LRT, by incorporating clear wayfinding methods, high visibility from a distance, and excellent accessibility.*
- *Provide covered waiting areas and comfortable seating for bus passengers. Design the terminal with distinctive features or architectural elements that make them easily recognizable and associated with the bus terminal.*
- *Surround the bus terminal with well-maintained landscaping to create a visual focal point. Trees, planters, and flower beds can draw attention.*
- *Create direct and clearly marked pedestrian paths leading to the bus terminal. Please update this information in the Urban Design Report and Concept Plan.*

Response:

- See our response above to the comments relates to the requested road widenings.
- The UD Report provides a fulsome description of the bike and pedestrian circulation and addresses the required and applicable policies.

- We disagree that the development blocks should be broken up further. As demonstrated in the UD report, the proposal provides for a fine-grain road network, in accordance with the applicable policies.
- The bus terminal is located at the terminus of the LRT and as shown in the materials submitted with the initial application and in the enclosed revised materials, the bus terminal is largely located inside and passenger waiting areas will be located inside with seating.
- Details related to architectural design, landscaping, way-finding and bike parking will be confirmed through the required Site Plan Control process. The purpose of the DPOS is to confirm the connectivity throughout the site and to deliver a road and parks to the City as well as facilitate the delivery of an upgraded and urbanized bus terminal. The enclosed materials demonstrate the proposed bus terminal can achieve HSR's desired number of bus bays, HSR's desired forward-only bus movement, and can function from a transportation perspective, as well as providing functional, safe and attractive connectivity to the LRT.

3.4.10 Parking / Underground Setbacks Comments

- *Underground Plans need to be provided so that staff can understand the setbacks from the property lines and location of unexcavated areas between blocks.*
- *A setback between underground parking and public streets are recommended to ensure the planting of trees on private property can be maintained in perpetuity.*
- *Areas of underground setback should be provided between the development blocks under private roads to ensure that all tree planting maintained in perpetuity and to accommodate structural differences between the foundations.*
- *It must be added to the Urban Design Report that all above grade parking will be lined with uses and no above grade parking will be exposed or visible to the public or private streets.*

Response:

- An underground plan was provided in the initial submission. The UD report was provided in support of the draft plan and demonstrates the orderly development of the site in accordance with the requirements of the legislation, policy, regulations and guidelines.
- The owner agrees to consider increasing setbacks from proposed underground parking levels to public and private streets for the public park blocks during the detailed design phase of development.

3.4.11 Sustainability and Environmental Design Comments

- *Incorporate sustainable building practices, such as green roofs, energy-efficient systems, and rainwater harvesting.*
- *highly recommended to introduce rain gardens, bioswales, and permeable pavements to manage stormwater runoff and lessen water pollution.*
- *Integrate trees, and shrubs, which are indigenous and drought-tolerant.*
- *Please add a section on integrating sustainability to the Urban Design Report.*

Response:

- We appreciate these comments and will work with the Owner and consultant to address them at the appropriate time, during the required Site Plan Control stage.

At the request of staff, we have provided additional preliminary urban design guidelines to aid staff in their review of future Site Plan Control applications, as well as a Shadow Study to assess shadow impacts on the proposed public park blocks.

3.5 Servicing and Engineering

Comments from Development Engineering staff with regards to servicing and engineering were received on November 24, 2023. These comments note that Development Engineering does not support the proposed draft plan approval until the time that a comprehensive sanitary sewer servicing study for the Site and surrounding area is completed.

Based on verbal comments received by Development Engineering at the end of December 2023, we were advised, for the first time, that the City is currently in the beginning phases of a sanitary sewer study for the Centennial Neighbourhoods area and that development cannot proceed until the study has been completed. It is our understanding, based on verbal discussions with the City's Development Engineering Staff, that the terms of reference are still being finalized and the next steps are to retain a consultant to do the work. It is anticipated to be completed by the end of 2024/1st quarter of 2025, although we understand the work has not yet commenced.

The intention to proceed with this study was not identified by the City in the FC comments from June 2022 or even in the written comments for the DPOS application (November 2023). We were only told about the potential study by Development Engineering over the phone in December 2023 when the Owner's consultant team called to clarify the formal comments we had received.

In an email from January 17, 2023, Development Engineering staff state that they will consider dealing with the servicing concerns verbally conveyed to the consultant team as conditions of Draft Approval to ensure the completion of the required study and implementation of any off-site works required per study recommendations to satisfy the City's Adequate Services By-law.

In addition, it is our understanding that Development Engineering expects the entire new public road to be delivered prior to the registration of the first phase of development. This request is inconsistent with common practice for phased developments, unnecessary relative to our ability to deliver servicing solutions through the road stubs at each end of Kenora and Centennial and has never been brought to our attention previously in the comments received in 2022 following the FC. The phasing of the DPOS has been strategically done in such a way to ensure the long-term viability of the shopping centre and important community hub. Delivering the entire public road in Phase 1 would mean a significant portion of the shopping center would need to be demolished at the outset of our development. The draft plan has always contemplated a phased approach and the maintenance of the shopping center throughout the delivery of the first two phases.

We request to advance the draft plan with a reasonable set of conditions which address the concern regarding servicing capacity. We also expect that the draft plan of subdivision approval will include a condition related to phasing. However, in our opinion, there is no rationale to require the entire new street (east-west) to be delivered in the first phase of development. Instead, conditions that will ensure an appropriate interim condition of the site (including servicing, grading, etc.) is the appropriate mechanism to ensure orderly development.

3.6 Noise

Comments from Development Planning with relation to noise impacts were received on February 8, 2024. These comments identify that, in the City's opinion, the noise study submitted with the initial application did not consider the noise implications of the future LRT terminus and HSR terminal at the southwest corner of the site in great enough detail, and should have identified the noise emanating from the loading docks associated with the Fortino's Supermarket as a Class 4, although we continue to believe that a Class 4 is not necessary for the site. In addition, the comments note that the noise implications from the entire redevelopment on the surrounding neighbourhood were not adequately considered.

We met with City staff on December 18, 2023, to further discuss these comments and our conclusions, and RWDI has been working with the City to address these concerns. However, we believe the Owner has dealt with the noise concerns as appropriate for

DPOS and that the bulk of any concerns can, and should, be managed through the Site Plan Control process as would be typical for a project of this size and scale.

In response, a revised noise study has been prepared for this submission which addresses these comments and includes an assessment of anticipated noise impacts from the LRT/HSR terminal.

4. CONCLUSION

Based on the comments received and numerous conversations with City staff and commenting agencies, the proposal has been carefully revised to address the comments received.

The site is designated and zoned for a significant amount of mixed-use development in the form of high-rise residential buildings. The as-of-right secondary plan policies and zoning regulations were established through, among other elements, a thorough and comprehensive public consultation strategy. A comprehensive Draft Plan of Subdivision application, supported by a detailed and comprehensive Urban Design, Public Realm, and Built Form Report demonstrating the Owner's long-term vision for the site, as well as comprehensive consultant reports, was submitted as our first step order to provide to the City a consolidated vision of the overall development, create visibility on the proposed delivery of key public elements, including the park and the proposed public road, and to deliver a clear plan to upgrade and reposition the existing bus terminus in a manner which integrates it with the LRT as well as the remainder of the development and the existing shopping center.

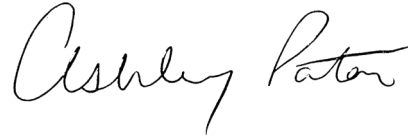
Based on the comments we've received through the draft plan of subdivision application; it appears that there may be a lack of understanding from some city staff that this site is designated and zoned for the proposed uses embodied in our application. It is our opinion that the proposed DPOS complies with the in-effect zoning and Secondary Plan policies pertaining to the Site, and that the proposed uses, design and layout of the blocks and buildings are appropriate to meet the planned function of the Site, which is to support a higher density development in a transit-supportive location.

We trust that the foregoing is satisfactory, however, if you have any questions or require additional information, please do not hesitate to contact the undersigned at apaton@bousfields.ca or 416-947-9744 ext. 403. We look forward to continuing to work with you on this application.

Yours very truly,
Bousfields Inc.



David Falletta, MCIP, RPP



Ashley Paton, MCIP, RPP