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May 16th, 2023

File No.: 2021-54

Mike Rolph, CBCO
Director of Building and Planning
Chief Building Official
Municipality of South Huron
322 Main Street South
Exeter, ON
NoM 1S6

**RE: Revised Zoning By-law Amendment Application
370 William Street, Exeter, South Huron
2687325 Ontario Inc.**

On behalf of 2687325 Ontario Inc. ("Owner"), we are pleased to submit a revised Zoning By-law Amendment Application ("Application") for the land known municipally as 370 William Street, Exeter, Municipality of South Huron ("Site")(Figure 1).

The Site is located on the east side of William Street, between Sanders Street West and John Street West (Figure 1). The Site has 37.7 metres of lot frontage, 42.2 metres of lot depth, and is 1,614 square metres in size. The Site is currently used as a funeral home, with the existing building being 487 square metres. The remaining portion of the Site is generally utilized for on-site parking.

The Site is located in the core area of Exeter, being adjacent to commercial uses to the east along Main Street, with residential uses to the west and immediate north and south, primarily of a low-density character. The Site is proximate to a range of commercial, recreational amenities and health services (Figure 2).

The South Huron Official Plan designates the Site as "Historic Core" and the South Huron Zoning By-law zones the land as "Core Commercial (C4-3)". The site-specific zoning on the Site was approved in 2022, through Application Z07-2022 and permitted the following:

In addition to the uses permitted by the Core Commercial (C4) zone, an apartment dwelling consisting entirely of residential uses, including at grade, is a permitted use subject to the following:

- a) Rear yard (minimum): 2.5 metres*
- b) Landscaped open space (minimum): 20%*
- c) Parking area setback from a property line: 0.7 metres*

The Owner is proposing to convert the existing building on the Site to accommodate a total of 10 dwelling units ("Proposed Development"). Since the time of the original zoning approval, the Owner

has applied for building permits and to address market demand and construction costs, is proposing to provide each dwelling unit with an independent, private entrance. This will remove the need for a common corridor and provides ease of access to the units. With this change, the Proposed Development is no longer considered an “Apartment Dwelling” and instead, is characterized as a “Multiple Attached Dwelling” within the South Huron Zoning By-law.

To permit the revised building design, a Zoning By-law Amendment is required to:

1. Permit a stand-alone residential use, including:
 - a. Apartment Dwelling
 - b. Multiple Attached Dwelling
2. Require a fence along the southern property line

The purpose of this Planning Justification Letter is to provide an overview of the Proposed Development and implementing revised Application, as well as to provide a professional land use opinion on the appropriateness of the Application.

Figure 1: Site



Source: County of Huron GIS Mapping

Figure 2: Surrounding Land Uses



Source: County of Huron GIS Mapping

1. Proposed Development

The Owner is proposing to convert the existing building from a funeral home to a 10-unit residential apartment building (refer to the appended Site Plan). A two-way access from William Street will connect to the parking lot, consisting of 17 parking spaces. A total of 2 barrier free spaces are provided.

Green amenity areas are provided in the rear and side yard. A new, solid wood fence is proposed along the two interior side yards and the rear yard to provide screening and privacy to and from surrounding land uses. An enclosed and secure garbage area is provided to the rear.

Individual entrances are proposed to each dwelling units. There are two entry doors fronting William Street, and four (4) on both the respective north and south side of the building.

To facilitate the conversion of the space, the Owner is proposing the following external renovations:

- Removal of the existing canopy fronting onto William Street

- Extending the second-floor area to the front
- Repaving the parking area to include drive aisles, demarcated parking spaces and accessible parking spaces
- Installing a new concrete sidewalk to connect the parking area to the building
- New solid wood fencing on the side and rear yards
- New sod and landscaping on the perimeter of the Site and building

The attached building elevations demonstrate design enhancements along the William Street frontage, including the addition of glazing, new front doors and a second storey clad in brick.

Figure 3: Proposed Building Elevation From William Street



Source: GB Architect Inc., May 2023

2. Land Use Policy Framework

Provincial Policy Statement

The Provincial Policy Statement (“PPS”), 2020 is a province-wide policy document that sets the foundation for regulating development and the use of land. The PPS is issued under Section 3 of the *Planning Act*. The PPS “provides for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment.”

In our opinion the Zoning By-law Amendment Application is consistent with the PPS and has regard for the applicable policies. The Application has demonstrated consistency to these key directives, or pillars, by:

- Accommodating an appropriate affordable and market-based range and mix of residential types (Section 1.1.1);
- Minimizing the need to expand the built boundary and remove land from agricultural production by providing new housing supply within the built-up area (Section 1.1.1);

- Providing dwelling units in a converted building within an existing area, thus providing for cost-effective intensification within the built boundary (Section 1.1.1);
- Providing residential intensification within the settlement area that has well established active transportation connections, local recreation amenities, and is transit-supportive (Section 1.1.2, 1.1.3.2, and 1.4);
- Adaptively reusing developed land for residential intensification (Section 1.4.3);
- Optimizing existing municipal infrastructure through the use of municipal water, storm and sanitary pipes, as well as the existing road network (Section 1.6.6.1 and 1.6.7.2);
- Contributing to the long-term prosperity of the Province by providing new development that does not require the extension of infrastructure, or increased long-term maintenance responsibilities (Section 1.7);
- Addressing potential hazards, through the completion of a Record of Site Condition (Section 3.2.2).

County of Huron Official Plan, 2015

The purpose of the Huron County Official Plan (“County OP”), is outlined in Section 1.2, stating that:

The County Official Plan is a statement of the community and is presented in the words of the community. It is a record and guide. Not only does it provide direction for the activities of individuals and community organizations, the County Official Plan provides guidelines to local municipalities for the development of local official plans. The policies and actions are general policies and are provided as guidelines.

The County OP includes five (5) resource maps, provided as reference, not land use designations. Detailed mapping and land use designations are to be provided in the local official plans. The Site is identified as a “Settlement Area”, which are built-up areas where development is to be concentrated. In Huron County, Settlement Areas include Towns, Villages, Hamlets and Lakeshore Residential Areas. Exeter is considered a Primary I Settlement Area that is intended as the primary location for growth and development in the County, offering a full range of amenities and employment options.

The County OP encourages efficient use of land and services, directing an overall increase in density and providing adaptable forms of housing. Large-scale residential development and redevelopment is to locate where social, health, and other services are available.

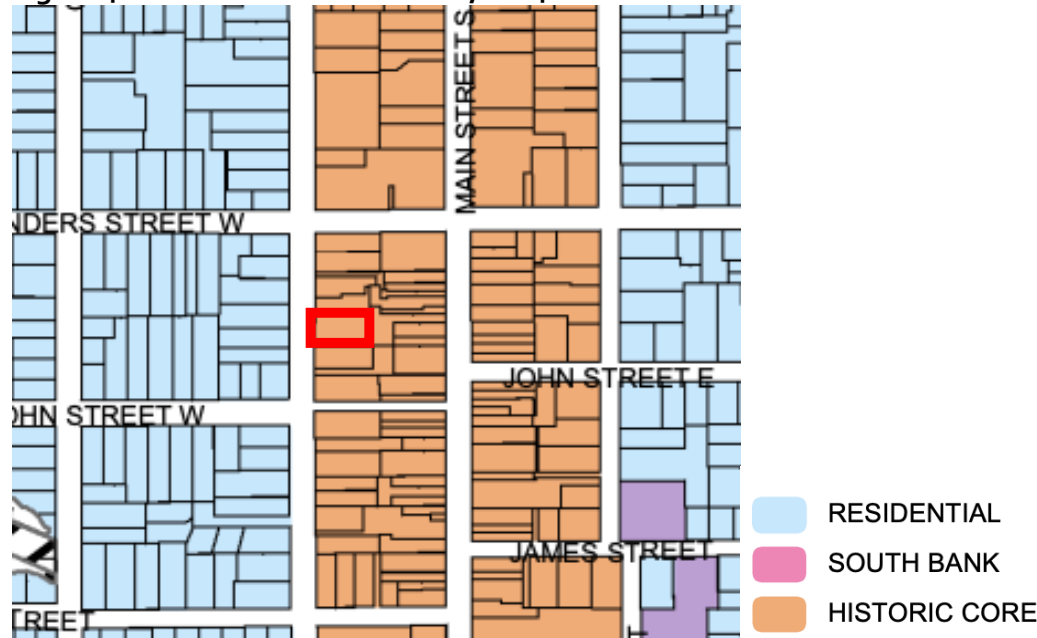
In our opinion, the Applications conform to the policies and actions of the County OP by directing adaptable and intensified residential growth to areas identified for development and having access to existing municipal infrastructure and built resources.

Municipality of South Huron Official Plan, 2014

The South Huron Official Plan (“OP”) identifies the “resources, capabilities and constraints of the land and the community.” Exeter is considered a Primary I Settlement Area through the OP. Section 7.4.1 states that Exeter shall be a focus area for growth and development over the long term.

The Site is designated as “Historic Core” on Schedule C of the OP (Figure 4). Section 7.5.3.4 of the OP characterizes this designation as the most diverse district along Main Street, including that residential intensification is encouraged within the residential neighbourhoods that exist on the east side of William Street.

Figure 4: South Huron Official Plan, 2014



Section 7.5.3.7 provides goals and policies for the Historic Core District, including the goals of:

5. Facilitating residential intensification;
6. Ensuring new development is compatible with existing development within the Historic Core District and with adjacent residential neighbourhoods;

To achieve these goals, the OP adopts a set of permitted uses and development policies. The permitted uses include residential uses subject to the Residential Intensification policies of Section 7.5.3.6.6.

Policies for development in the Historic Core designation applicable to the Proposed Development include (Section 7.5.3.7.4):

1. Buildings and sites will be designed to facilitate compatible development. Compatible development may not necessarily be the same as existing buildings in the vicinity, but enhances an established community and co-exists with existing development without causing undue adverse impact on surrounding properties.
2. Commercial uses are required to be oriented to Main Street and be established at grade.
4. Residential uses within the District are directed to be located above/to the rear of commercial uses, or oriented to William and Andrew Street. Residential intensification will be permitted within the District in accordance with Section 7.5.3.6.6, Residential Intensification.
12. The provision of sustainable design elements on any adjoining street (e.g. trees, plantings, street furniture, curb ramps, waste receptacles and bicycle parking facilities) shall be implemented through site plan control, consistent with the recommendations included in the Exeter Community Improvement and Streetscape Design Plan (2012).

Residential intensification of the Historic Core District is addressed in Section 7.5.3.7.6 as noted above. This section notes that apartment buildings are a permitted form of residential intensification. The following criteria is set forth for the municipality to consider when reviewing applications for residential apartment building infill:

1. Multiple-unit residential buildings and apartment buildings are directed to front on to William and Andrew Street.
2. The proposed development lands are appropriately suited for intensification in the context of the surrounding neighbourhood.
3. Existing water, sanitary sewer services, and storm water management facilities can accommodate the additional development.
4. The road network can accommodate the traffic generated.
5. The proposal respects and reinforces the existing physical character of the buildings and streetscapes.
6. The proposal provides height, massing and scale appropriate to the site and compatible with adjacent lands.
7. The proposal screens waste receptacles, loading and service areas.

In our opinion, the Application conforms to the OP for the following reasons:

- Residential intensification is encouraged, particularly along William and Andrew Street.

- The OP permits stand-alone residential buildings on the Site, including multi-unit residential buildings.
- The Proposed Development is compatible with the surrounding development, providing a transition from the main street residential and commercial uses to the low-density residential uses on the west side of William Street.
- The built-form on the Site, being a 2-storey building in the existing location, will remain largely unchanged except for the removal of the canopy and additional floor area on the second floor.
- The Proposed Development will result in general site improvements, including off-street parking, accessible parking, landscaping, and building design with greater emphasis on the front building elevation.
- While the Proposed Development is considered a “Multiple Attached Dwelling”, it continues to provide for a intensification of a vacant property within the Core Area.
- The Site can be serviced through existing connections on William Street and the pervious cover is not being altered.

Huron County Residential Intensification Guidelines, 2020

The Residential Intensification Guidelines (November 4, 2020) provide a “framework to guide the planning and design of residential intensification projects within the County. These guidelines are intended to be used by property owners, developers, builders, architects, and planners in preparing plans for intensification projects.” The Guidelines are to be used for Zoning By-law Amendment, the review of Site Plan Control applications, and through the variance and consent processes of the Committee of Adjustment.

Guidelines that are relevant to the Application are provided in Section 4.3 (Conversions) and include:

- Minimize the number of primary entrance doors facing street for multiple unit buildings.
- Maintaining the original entrance is preferable with unit divisions to occur internally.
- Additional entrances should be located at the side or rear of the dwelling.
- Maintain the original front façade where possible, recognizing minor modifications may be required.
- Where possible, maintain existing private outdoor amenity space.
- Additional parking should be grouped and screened from adjacent properties / public roads; and directed to side or rear yard.

In our opinion, the Application has regard for the guidelines noted above. The Proposed Development has limited the entrances facing the street to two (2), with the remaining entrances to the side yards.

There are four (4) entry doors located on the south side of the Site, abutting an existing residential property. To mitigate any impact on privacy and overlook, a solid six (6) foot wood fence is proposed to be constructed. In addition to the fence, there is a minimum setback to the building of 2.73 metres, providing sufficient width for a pedestrian walkway. As part of the Building Permit Application, detailed building elevations have been provided to demonstrate the design approach.

The inclusion of private, independent entrances to each dwelling unit, also serves to provide direct access for those living in the units. A small landing area is available to each resident to add additional amenity space.

Based on the foregoing, it is our opinion, the use of a side yard walkway for four (4) individual entrances to dwelling units for a centrally located redevelopment within the Core Area is an appropriate development form that maintains land use compatibility.

South Huron Zoning By-law, 2018

The South Huron Zoning By-law, 2018, zones the Site as “Core Commercial (C4-3)”. The Zoning By-law permits a range of commercial uses including the existing funeral home, as well as dwelling units, provided that at-grade commercial uses form part of the development and stand-alone apartment dwellings.

The Zoning By-law Amendment Application is requesting a site-specific provision to include “Multiple Attached Dwelling” within the list of permitted uses within the C4-3 Zone. This will facilitate the proposed dwelling units gaining access through an individual entrance from the exterior.

The Zoning By-law defines a “Multiple Attached Dwelling” as “a building that is completely divided vertically into 3 or more dwelling units by a party wall of masonry construction, each dwelling unit having independent entrance directly from the outside.”

Through this Application, it is also requested that a site-specific provision be added that requires the construction of a solid fence along the side and rear property lines.

The Site is otherwise compliant with the Zoning By-law and the associated provisions.

It is our opinion that the proposed Zoning By-law Amendment is appropriate and represents good land use planning. Both an apartment building and a multiple attached dwelling result in the creation of multiple units on the Site and serves as an adaptive re-use of the vacant property. The additional use, in our opinion, is technical in nature as it relates to the form of pedestrian access to the dwelling units, being through individual entrances versus a common corridor.

3. Summary

In our opinion, the proposed Zoning By-law Amendment Application is appropriate, represents good land use planning, and is in the public interest.

In support of the Application, please find enclosed the following:

- One (1) copy of the completed Zoning By-law Amendment Application Form;
- One (1) copy of the Building Permit Application Package; and,
- The applicable Zoning By-law Amendment application fee, being \$2,067.00.

We trust the submission can be accepted and circulated for review. Should you have any questions or comments, please let us know and we would be happy to discuss further.

Kind regards,



Caroline Baker, MCIP, RPP
Principal

CC Matt Ignor, Owner