

Ms. Andrea Gummo
Senior Planner
City of Kingston
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Kingston, On
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Via Email: agummo@cityofkingston.ca

RE: Density by Design Comments
SPEAKingston

Dear Ms. Gummo,

SPEAKingston has reviewed the City of Kingston's Density by Design: Kingston's Mid-Rise and Tall Building Policy – Issues and Options Report and considered the workshop follow-up questions presented by Sonya Bolton via email on February 21, 2020. Among other comments, we particularly wish to emphasize:

- The financial viability of mid-rise buildings
- The appropriateness of the area for increased density and residential development
- The impacts (negative) of density limits and value of greater focus on built form
- Integration of ground floor commercial, pedestrian spaces, and emphasis on interesting/attractive design
- The need for increasing the setback from the street
- Alternative design ideas (sidewalk bump-outs, street furniture, hardscaping and landscaping)
- The value of density, additional housing and increasing the tax base.

SPEAKingston was founded a year and a half ago and currently has over 400 members. The organization was founded by a group of public sector workers, local business owners, executives and community leaders seeking to add their voice in support of smart growth and participate in the ongoing debate surrounding development, jobs, taxes and infrastructure investment in the City.

SPEAKingston stands for Social. Political. Economic. Action. Kingston. SPEAKingston views smart growth as a strategic direction for our City which has the following tenets:

1. Strengthen physical, technological and cultural infrastructure;
2. Grow the economic base with expanding employment, housing options and competitive taxes;
3. Foster attractive, vibrant, walkable and safe urban core and neighbourhoods; and,
4. Protect historical assets and natural environment in responsible ways.

SPEAKingston provides the following commentary for consideration relating specifically to the questions posed via email. In this context, SPEAKingston wants to ensure that their interests, and expertise, are effectively considered throughout the Density by Design Process.

Question 1

Buildings along the Williamsville Main Street are permitted to have a streetwall height of 3 to 4 storeys with a maximum of 6 storeys. Buildings are permitted to be 10 storeys subject to sufficient lot depth, and this represents the form of development we've seen most often since these permissions were created.

- *What do you think about the permissions for 3-4 storeys at the street with a maximum of 6 storeys total? (and why do you think that?)*
- *What do you think about the permissions for up to 10 storeys? (and why)*

A streetwall height of three to four storeys is appropriate, however, there is a need for design to integrate at-grade commercial. Existing and as-of-right three to four storey buildings currently have undesirable streetscapes which impacts the overall design of these buildings.

SPEAKingston has concern with the prospect of locking the Williamsville Main Street corridor to a specific height, particularly with regard to the completion of the Mayor's Task Force on Housing review, and in particular Appendix D: Rental Market Housing Development Viability Analysis Report. The economic assessment questions the financial viability of mid-rise buildings within the Williamsville area of the City. Based on the review, the internal rate of return (IRR) was found to be lower for the 6-storey building compared to the 10-storey building. If height and mass restrictions are introduced, the financial success of development within the Williamsville Main Street area will likely be impacted and could result in fewer potential residential developments and/or fewer housing units created within the Williamsville area.

Despite the number of previous appeals to the Ontario Municipal Board (OMB) and continued appeals to the Local Planning Appeal Tribunal (LPAT), development is consistently approved within the Williamsville Main Street area. Each of the 10 storey projects went through an extensive urban design process per the current policy framework, often requiring three to four iterations before staff were in the position to confirm consistency. This is an appropriate area of the City to encourage increased density and residential development. Restrictive development policies related to density and height will halt future development in this area, to the detriment of the City.

Question 2

Look at the map showing approved and proposed developments in the Corridor.

- *Are there areas remaining that make sense to you for additional height and density?*
- *Where are they, and what height and/or number of units do you think makes sense?*

The Williamsville Main Street corridor is the only place in recent years where the City has been able to obtain significant intensification. The Williamsville Main Street corridor is appropriate for additional height and density within the City. The Williamsville corridor provides a vital connection to downtown Kingston and additional services at the north end of Princess Street and Sir John A. MacDonald Boulevard. SPEAKingston has appreciated that the Density by Design process up to this point has not considered or created discussion regarding density or number of units, but rather has focused on the overall built form. While the current policy framework has its flaws, such as relying on angular plane rather than stepbacks, it emphasizes building form rather than maximum density. It is important to realize that density limits could encourage developers to propose larger units with a greater number of bedrooms rather than reduce the massing or overall scale of a proposed development. A greater focus on built form is required to ensure good development. SPEAKingston recommends the continued use of the Williamsville form-based development policy, rather than introducing density or height requirements.

Question 3

What improvements would support your use of the Corridor? Specifically, as they relate to active transportation in the Corridor?

Improvements are required related to the public realm within the Williamsville Main Street corridor. There are challenges with existing and as-of-right built form. Buildings constructed as-of-right do not have a setback from the right-of-way to support use of the area for pedestrians or active transportation. As well, newer residential buildings and as-of-right development within the Williamsville area do not commonly integrate main floor commercial, which leaves pedestrians disconnected from the streetscape. In some cases, newer buildings have basement windows that align with the street. It is important to realize that it will be challenging to convert existing ground floor residential spaces to necessary commercial units in the future as the corridor intensifies. We strongly believe that reasonable and appropriate setbacks of buildings from sidewalks and appropriate design criteria are used for ground floor facades including hard and soft landscaping in order to avoid recent mistakes made in Williamsville.

SPEAKingston offers the following recommendations to improve the public realm of the Williamsville Main Street corridor. Certainly, increasing the setback from the Street is an option and has been considered with all of the recently approved taller buildings in the corridor. The Streetscape and podium levels were all critically designed. An

alternative option is the consideration of the design of the right-of-way itself to a form more consistent with Princess Street downtown. Alternative design of the street could occur through sidewalk bump-outs, similar to those undertaken on the southern portion of Princess Street, on-street parking, and integration of street furniture, hardscaping and landscaping. Through the alteration of the right-of-way, enhancement of the public realm will occur, improving much needed parking that has been removed by cycling infrastructure, making it safer for all users.

Question 4

Based on what can be considered in zoning bylaws, what is important for the pedestrian experience at ground level?

E.g. Building setbacks, stepback of the upper floors of a building, how ground floor spaces integrate with the public realm (ie. the sidewalk)

SPEAKingston is confident that in the next 10 to 20 years, the City of Kingston will be most proud of the buildings which have been subject to thorough planning approval processes and technical reviews, such as zoning by-law amendments and site plan control processes, rather than those which have been built closer to the as-of-right built form of 4-6 storeys. Through technical reviews, the City has required wider clearways to accommodate greater pedestrian space, interesting and attractive building design, ground floor commercial spaces, and pedestrian and public spaces.

It should be emphasized that Appendix D: Rental Market Housing Development Viability Analysis Report concludes that *“Up-zoning of properties in strategic locations that will accommodate rental housing. This can reduce the length of approvals, provides developers more certainty when acquiring land, provide more leasable area, and mitigates approval risk”* (page 30). As such, zoning for larger developments can promote and support their construction within the City.

Summary

It is important to bring people closer to the services and amenities they utilize and rely on. Increasing density in the downtown is imperative to ensuring the viability of business. Bringing people downtown will place greater emphasis on the use of transportation modes beyond personal vehicles, such as active transportation, public transit, and cycling. The City of Kingston has declared a climate emergency. Combating climate change can occur through increasing density in the downtown core as it creates greater reliance and use of transit, cycling and active modes of transportation. Supporting greater residential development in the City, and specifically the Williamsville area, will result in an increased tax base which will benefit both new and existing residents of the City.

SPEAKingston would like to reiterate the importance of this Report as a highly impactful document for the future of housing in Kingston. Through discussions regarding appropriate regulations and policies, we encourage the City to strike a balance between expediency and ‘getting it right’.

Should you require any further clarification, please feel free to contact us.

SPEAKingston

Martin L. Skolnick
Co-Chair, Policy/Advocacy Committee