

March 4, 2025

City of Kawartha Lakes
Planning and Development
180 Kent Street West, Lindsay ON K9V 2Y6

Attn: Breanna Veilleux

Re: Application for a Zoning By-law Amendment–
46 – 66 William Street North; Part Lot 5, S of Wellington Street, Part 1, 57R–5112 Former Town
of Lindsay, now in the City of Kawartha Lakes
Municipal File: D01–2020–005 and D06–2020–023
Ecovue Reference: 18–1834

Dear Ms. Veilleux,

The following is a response to the Planning Comments (dated September 20, 2024) from the City of Kawartha Lakes Planning Division in relation to the above-noted applications. Comments received from the City were generally related to parking requirements and heritage. The responses to these comments are included in the Comment Response Matrix.

The initial submission included a Planning Justification Report referencing policies within the 2020 Provincial Policy Statement, the 2020 Growth Plan and the Lindsay Official Plan, all of which are no longer in effect. In order to address current applicable policies, the following Planning Letter speaks to the 2024 Provincial Planning Statement (PPS), which replaced the 2020 Provincial Policy Statement and the 2020 Growth Plan in October 2024, as well as the Lindsay Secondary Plan (LSP), which replaced the Lindsay Official Plan in February 2024.

1.0 Provincial Planning Statement, 2024 (PPS)

The 2024 Provincial Planning Statement (PPS) provides a policy framework for land use within the Province of Ontario. It is the responsibility of the local planning authority – in this case the City of Kawartha Lakes – to uphold the policies of the PPS pertaining to land use planning and development. In particular, the planning authority must ensure that their decisions are consistent with key

provincial interests including policies related to settlement areas in urban and rural communities, the wise use and management of resources, and public health and safety.

2.1 Settlement Areas in Municipalities

The subject property is located within a settlement area (Lindsay) and is therefore subject to Section 2.3 of the PPS.

Section 2.3.1 states that: *“Settlement areas shall be the focus of growth and development.”* Additionally, Section 2.3.2 of the PPS states: *“Land use patterns within settlement areas should be based on densities and a mix of land uses which efficiently use land and resources, optimize existing and planned infrastructure and public service facilities, support active transportation and are transit-supportive, as appropriate.”*

Furthermore, the PPS supports *“general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options”*.

The proposed mixed-use development will provide additional dwelling units and retail space within the downtown area of Lindsay, which has public transit available, and will contribute to the growth of the municipality. The development will take place on underutilized lands within the existing built boundary of Lindsay and will provide a mix of land uses. The addition of the proposed independent apartment units represents intensification and will increase the residential density of the area.

Furthermore, the proposed development will not result in the uneconomical expansion of municipal infrastructure as demonstrated in the supporting technical studies.

Therefore, the proposed development is consistent with Section 2.3 of the PPS.

2.2 Housing

Section 2.2 of the PPS describes policies related to housing.

According to Section 2.2.1, planning authorities (in this case, the City of Kawartha Lakes) are required to *“provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by permitting and facilitating:*

- a) all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities;*
- b) all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d) transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.”*

The proposed development will contribute to diversifying the City’s housing options and will provide a form of housing that is in high demand. The proposed apartment units represent residential intensification and will not require any expansion to existing municipal infrastructure.

By providing suitable housing in close proximity to public transit and amenities (including healthcare and institutional amenities), the proposed development will meet the future social, health and well-being requirements of current and future residents of the City of Kawartha Lakes.

2.3 Infrastructure and Public Service Facilities – Sewage, Water and Stormwater

Section 3.6 of the PPS outlines the policies regarding sewage and water systems. It is stated in this section that the ideal form of servicing within settlement areas is through municipal sewer and water systems. Municipal water and sewer servicing will be utilized by the proposed development through connections to water and sewer mains underneath Wellington Street and William Street North, respectively. Details of the specifications of servicing infrastructure are outlined in the submitted Functional Servicing Report which notes that there is sufficient water and wastewater servicing capacity in the municipal system to accommodate the additional 207 units. Although it is understood that upgrades to the servicing infrastructure will be required, it is our opinion that they can be implemented through a holding provision and a future servicing study.

Section 3.6.8 outlines the policies regarding stormwater management. This section states that *"planning for stormwater management shall:*

- a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c) minimize erosion and changes in water balance including through the use of green infrastructure;*
- d) mitigate risks to human health, safety, property and the environment;*
- e) maximize the extent and function of vegetative and pervious surfaces;*
- f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale."*

As demonstrated in the submitted Preliminary Stormwater Management Plan, the site will be developed so as to adequately control stormwater quality and quantity on the site, in line with the above requirements. Stormwater quantity will be controlled through underground piped storage with an orifice plate that will control post-development flows to pre-development flows. The stormwater will then be routed to municipal drains on Wellington Street. Stormwater quality will be controlled through two (2) Filterra Stormwater Bioretention Systems that will provide 85% extraction of biosolids, in accordance with Ministry of Environment, Conservation and Parks (MECP) requirements. Therefore, the proposed development is consistent with Section 3.6. of the PPS.

2.4 Natural and Human-Made Hazards

Section 5.2 of the PPS addresses development that occurs within natural and human-made hazards. As determined through the Phase One Environmental Site Assessment (ESA), the subject lands may contain several areas of potential environmental concern (APECs) and potential contaminants of concern (PCOCs). This is due in large part to the lands being the site of a former auto repair shop.

The properties are also located in the vicinity of a former scrap yard. A total of eight (8) potential APECs were identified on the site and it was noted that a Phase Two ESA is required in order to characterize the soil and groundwater quality on the site and determine the extent of contamination (if any) and remediation (if required). That said, the potential APECs on the site do not present any issues that would preclude successful remediation of the site.

From a natural hazard perspective, there is a potential steep slope located on the eastern edge of the subject lands. However, this slope will be modified and reinforced to ensure construction stability, as noted in the Hydrogeological and Geotechnical Assessment.

Therefore, the proposed development is consistent with Section 5.2 of the PPS.

2.5 Cultural Heritage and Archaeology

Section 4.6 of the PPS includes policies in relation to cultural heritage and archaeology and states that “[d]evelopment and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved”. As noted in the Stage 1 and 2 Archaeological Impact Assessment, no culturally significant artifacts were discovered on the subject lands and a letter requesting archaeological clearance from the Ministry of Culture, Tourism and Sport has been submitted. As such, the proposal is consistent with Section 4.6 of the PPS.

2.0 The Lindsay Secondary Plan (LSP)

The subject property is designated Central Business District, according to Schedule “F-1” to the Lindsay Secondary Plan (LSP). Policies affecting the Central Business District designation are discussed in Section 31.2.3.2.2 of the LSP. In addition, the proposed development is subject to the Housing and Cultural Heritage policies of the LSP. It should also be noted that the LSP does not place a limit on density or size of buildings within the Central Business District designation and as such, the previous Official Plan Amendment (OPA) in relation to residential density will not apply at present.

2.6 Central Business District Policies

According to Section 31.2.3.2.2 of the LSP, a full range of retail and commercial uses shall be permitted within the Central Business District, in addition to “residential uses...on the upper storeys of a

commercial building". Based on the above, the proposed mixed-use development is a permitted use within the designation.

Section 31.2.3.2.2.2. of the LSP speaks to building height and states that *"development within the Central Business District should generally contain buildings which are medium (3 to 4 stories) and high-rise (5 to 8 stories) in height and that high-rise buildings should be located away from stable neighbourhoods adjacent to the Central Business District"*.

The proposed 8-storey mixed use building will meet the above height requirements and will be located in an appropriate area for density as it will not be directly adjacent to any residential dwelling units, with the exception of the row housing units located on the western side of William Street. Although the building will be taller than the surrounding buildings, it will be positioned on the property so as to avoid blocking views from nearby residential properties. It will also be located opposite a proposed 8-storey building on the northeast corner of the intersection of William and Wellington Streets.

Section 31.2.3.2.2.3. of the LSP states that *"the preferred form of development within the Central Business District is retail and office uses at grade with residential uses located on upper floors of buildings and/or behind the front portion of buildings, where appropriate"*.

As noted, the proposed development will include commercial uses on the ground floor with residential units on the upper storeys.

Furthermore, Section 31.2.3.2.2.4. of the LSP include general policies that apply to the Central Business District designation which include:

- a) Traditional downtown areas shall be revitalized and preserved to reinforce the character of the downtown;*

The proposed development represents intensification, will result in the revitalization of the Lindsay Downtown area and is in keeping with the surrounding land uses which are predominantly service and retail uses.

- b) Transit facilities should be easily accessible to pedestrians;*

The proposed development will be located within walking distance of public parks and community facilities. The Lindsay Transit bus service has a transit stop located within 100 metres of the subject lands at the corner of William Street and Peel Street, which will provide public transit options for the residents.

In addition to public transportation, the applicants intend to provide a shuttle service that will provide the residents with a convenient mode of access to community facilities and other locations within Lindsay.

c) All utilities shall be provided underground, where feasible;

The proposed development will include underground utilities.

d) Adequate off-street parking and loading spaces, or cash-in-lieu of parking as provided for in Section 18.16.9, shall be provided. Requirements may be satisfied through off-street communal parking, and municipally or privately owned parking areas located in the Central Business District. The City encourages underground parking for mid and high rise developments within the Central Business District. Parking should be located in the rear or centre of the urban blocks with little visibility to downtown streets. In the case where a parking lot does have street frontage, then a landscape setback should be used to help mitigate the transition between the lot and public realm. Limited on-street parking will be provided in appropriate areas.

The proposed development will include both underground and at-grade parking spaces and will contain a total of 177 parking spaces with 162 spaces (parking ratio of 0.83) being dedicated for the residential component.

Although the proposed development does not comply with the parking requirements of the Town of Lindsay Zoning By-law, it is our opinion the proposed parking ratio 0.83 per unit is appropriate as the units will be marketed towards seniors that will likely not own a vehicle. Additionally, given the location of the subject lands in downtown Lindsay, the tenants will have access to a nearby transit stop and to a variety of services within a short walking distance.

The proposed development will also offer shuttles to various places around the City, such as clinics, recreational centres, and shopping plazas. Furthermore, the commercial/retail spaces on the ground floor are expected to be businesses that can provide everyday services (restaurant/coffee shop, hairdresser, chiropractor, etc.) to tenants.

2.7 Cultural Heritage Policies:

The LSP contains cultural heritage policies that apply to the subject development given its proximity to the Lindsay Downtown Heritage Conservation District.

Section 31.2.3.2.2.6. states that *“development or redevelopment, including intensification in designated Central Business District shall preserve, complement and enhance the cultural heritage and/or architectural character of these areas. Among the specific requirements are the following:*

- a) the sensitive location, limited extent and effective buffering of parking facilities so as not to detract from historic streetscapes and adjacent buildings and uses;*
- b) the consistency of setbacks and continuity of character, in order to maintain and restore pedestrian-oriented streetscapes and the encouragement of pedestrian activity by providing linkages between the downtown and adjacent areas of residential or other development; and*
- c) compliance with the heritage policies of Sections 10 and 18.14 of this Plan.*

Furthermore, Section 31.2.3.2.2.13 states that *“buildings and structures of cultural heritage value or interest shall be conserved and incorporated, where appropriate, into any development or redevelopment project. The preservation of areas of cultural heritage value or interest shall also be encouraged”*.

The proposed development will be pedestrian friendly in design and in keeping with the surrounding character. Additionally, the development will not result in the destruction or alteration of the heritage buildings that are located in the vicinity. Furthermore, given the location and orientation of the proposed building, it will not result in extending shadows or cause obstruction in significant viewing of the surrounding heritage buildings as demonstrated by the shadow study.

Furthermore, the applicant has undertaken a Heritage Impact Assessment, with corresponding responses to comments from the City’s Heritage Committee, regarding impacts to the nearby (but not adjacent) Heritage Conservation District. The conclusion of the applicant’s Heritage Planner, Mr. Dan Currie of MHBC, is that the proposed development will not impact the heritage attributes of the nearby District.

2.8 Housing Policies

Section 31.2.2 of the LSP speaks to the housing policies of the municipality.

Section 31.2.2.1.1 of the LSP states that the priority areas for intensification development in Lindsay shall generally follow the recommendations of the City's Growth Management Strategy (May 2011) which include:

c) Sites located along Provincial highways, City Roads, **major arterial**, collectors, **transit corridors and within the built-up area**; and,

d) Sites where there is sufficient municipal servicing capacity to accommodate development.

Additionally, according to Section 31.2.2.1.3, the City encourages “intensification development along nodes and corridors and in areas that are or will be serviced by transit, readily serviced by public service facilities and nearby amenities, and developed to support pedestrian activity”.


The proposed development is located at the corner of William Street and Wellington Street, both of which are considered arterial roads. Additionally, the subject lands are located close to transit stops and within the Lindsay downtown core, which includes community facilities, amenities and a variety of retail and service uses. Furthermore, the completed technical assessments, including the servicing study, are supportive of the proposed development.

Given the above, it is our opinion that the proposed development conforms with the policies of the LSP.

We trust that this information sufficiently addresses the concerns of staff regarding the proposed development at the above-noted property. Therefore, we respectfully request that the application be brought back to the Planning Advisory Committee (PAC) at the earliest opportunity.


Respectfully submitted,

ECOVUE CONSULTING SERVICES INC.



J. Kent Randall B.E.S. MCIP RPP
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