



September 18, 2025

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Town of Collingwood
P.O. Box 157, 97 Hurontario Street
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**Re: Scoped Policy Review
Proposed Site Plan Approval For a Mid-Rise Apartment Development
Block 151, Registered Plan of Subdivision 51M-865, Peel Street
Project Name: Harmony Living
Town File: PLSPMA2025407**

Robert Russell Planning Consultants Inc. has been retained by Mamta Developments Inc. to prepare a scoped Official Plan policy review, as requested by the Town of Collingwood, related to the proposed development.

Site and Area Context

The Subject Property is located on the east side of Peel Street, between Peel Street and the Pretty River. The site was created as a block on a previous plan of subdivision that was undertaken by an unrelated developer. That plan of subdivision appears to have been approximately 20 – 22 ha in area and includes mostly single detached dwellings, along with a stormwater pond and open space. However, the plan of subdivision also included Blocks 149 and 150 which have already been developed for apartment residential uses immediately to the north of the Subject Property.

The Subject Property is generally rectangular in shape, however the west property limit, which abuts Peel Street, is interrupted by a row of 10 single detached dwellings. The Subject Property wraps around this row of lots on the north, east, and south sides. Area of the Subject Property is 2.45 hectares, with a width of approximately 255 m and a depth that varies from 80 metres to 125 metres.

On the east side of the Pretty River, immediately opposite the Subject Property, is an area of existing industrial and employment uses. Immediately south of those industrial and employment uses, and only 300 m from the Subject Property is the proposed Poplar Regional Health and Wellness Village which has a partial approval through an MZO issued in November of 2022. It is understood that progress on that large project is currently slowed, in part, because of the ongoing planning process for the proposed relocation of the Collingwood Marine and General Hospital to lands within the Poplar Regional Health and Wellness Village.

Development Concept

The Proposed Development consists of 4 apartment buildings containing 4 residential storeys per building. Building D will provide covered parking at grade within the building footprint, resulting in a total building height of 5 storeys.

The 4 apartment buildings will contain a total of 245 residential units. Buildings A, B, and C will be generally

the same design with 66 units per building and a Gross Floor Area (GFA) per building of 4683 m² whereas building D will have 47 units and a GFA of 3319 m². Total residential GFA for the project is 17,367 m² with common areas adding 2814 m² of additional building space.

Total building footprint on the 2.45 ha site is 5459 m² which is equal to a coverage of only 22.3%. Parking and driveway areas make up another 35% of the Subject Property and landscaping represents the remaining site area of more than 42%.

Town of Collingwood Official Plan

The Town of Collingwood adopted a new Official Plan on December 11, 2023. This Plan was modified by the County of Simcoe and approved on September 24, 2024. Portions of the Plan have been appealed to the Ontario Land Tribunal and are not yet in effect.

Town of Collingwood Planning Staff have requested a focused policy analysis related to two specific sections of the Official Plan.

- Section 3.5 Ensuring High Quality Built Spaces, subsections (d) through (f); and,
- Section 5.1.8.2 Mid-Rise Buildings.

Please note that at the time this Planning Brief was prepared, Section 5.1.8.2 was still under appeal and would not be applicable to the Proposed Development. However, the analysis is still provided as requested for information purposes only. The analysis related to Section 5.1.8.2 should not factor into the consideration of whether this Site Plan application conforms with the Official Plan.

Ensuring High Quality Built Spaces

Section 3.5 of the Town of Collingwood Official Plan provides a collection of general policies related to design related matters. Subsections (d) through (f) specifically address the issue of Compatible Development.

“3.5(d) A fundamental policy element of this Plan is to ensure that new development is compatible with its surrounding built form and landscape context, as well as providing for an appropriate transition to any surrounding sensitive land uses. It is recognized that all communities evolve over time, and one of the most important challenges for decision makers is to establish an approach to development approval that ensures that change is understood on the basis of “Compatible Development”. The concept and definition of compatible development is intended to ensure that all new development within the Town is appropriately integrated into the existing built form and landscape and enhances the image, livability and character of the entire Town. The starting point is to consider the tested definition of “Compatible Development”, as follows:

‘Compatible development means development that may not necessarily be the same as, or even similar to the existing buildings/development in the vicinity, but, nonetheless, enhances an established community and coexists with existing development without causing any undue, adverse

impact on surrounding properties.”

As previously noted in the preceding sections of this Planning Brief, the Subject Property is within an area that has been partially developed for single detached and apartment residential uses. Although a development proposal doesn't have to be the same as the existing built form to be compatible, the Proposed Development is very similar to the existing apartment development located immediately north of the Subject Property. The existing development consists of a site with 3 apartment buildings of 4 storeys each, with surface parking. Each of those apartment buildings is similar in size and massing to the Proposed Development.

Given that the Proposed Development closely mirrors an existing and adjacent development, it is a logical assumption that the Proposed Development is compatible with the existing apartment development. Carrying that logic forward, it could be assumed that the existing apartment development meets the requirements of these policies and is compatible with the surrounding neighbourhood, and by providing more of the same, the Proposed Development would also be compatible with the surrounding neighbourhood.

“3.5(e) Compatible Development is an overarching principle of good planning and is applicable throughout the Town. Its definition needs to be clearly understood and applied in different ways and in different contexts throughout the Town. This definition raises a variety of key phrases that require further definition:

i. Development in the vicinity, where the concept of vicinity can be flexible. Within the Collingwood context, the definition of vicinity should vary by the scale of development. There are generally two key scales of development that must be considered, including:

> Major Development, where land assembly and significant development intensification are proposed generally including most mid or high-rise built forms or employment uses. The vicinity here should be extensive, a minimum of 120 metres from the site of the proposed development;...

ii. Enhance an established community. This is a phrase that needs to be articulated generally. In order to pass this test, the nature and character of the defined vicinity needs to be considered and articulated. Clear statements about those attributes that define the character of that vicinity are required to assist in the determination of what form of development can enhance that character and what form of development may be detrimental. Further, community investment is an important factor to consider where new and significant investment within an established community may be both necessary and desirable; and

iii. Coexistence without undue, adverse impact on surrounding properties. This test is usually related to easily identifiable/quantifiable impacts related to shadow, privacy, traffic and parking. In some instances, the concept of visual impact may be established as an important development review criterion. Visual impact analysis will need to be tied to the attributes that define the community's character on an identified vicinity basis.

Comments provided by the Town of Collingwood have indicated that the Proposed Development would be considered a Major Development. However, it should be noted that although the Proposed Development is for a mid-rise project, it does not require land assembly, nor does it propose intensification in terms of such factors as density, height, setbacks, or coverage, and is in full compliance with the existing R3-8 zone that applies to the site. As such, there is no intensification proposed, and Mamta Homes only seeks to build something that is already permitted under the existing and applicable policies and regulations.

Notwithstanding this apparent discrepancy with the Town's interpretation of policy 3.5(e)(i), the analysis in this report will be based on the minimum 120 m radius around the Subject Property.

The established community surrounding the Subject Property is relatively new, has not yet been fully developed. There are some vacant lands in the vicinity, including a block that is zoned for commercial uses at the north west corner of Peel Street and Collins Street. There is also a draft approved Plan of Subdivision with zoning in place at the south terminus of Peel Street and Williams Street. As such, the existing community has not yet been fully established and is still inventing itself.

Despite the ongoing and sequential growth in this area of Collingwood, there is enough of the community already in place to determine the community character and evaluate the potential impacts of the Proposed Development. As noted previously the surrounding neighbourhood is predominantly single detached residential, but on the east side of Peel Street, the built form shifts to a predominately mid-rise apartment character with surface parking. Although there are a few single detached lots on the east side of Peel Street within the vicinity of the Subject Property, these total only 20 dwellings. The Proposed Development would continue the existing development pattern on the east side of Peel Street to provide a more cohesive feel the surrounding community and help the community establish itself in time. As such, it could be argued that by completing the community, the Proposed Development would also enhance it.

The measure of whether a development can coexist with the surrounding land uses is generally associated with the potential impacts on those existing land uses. In terms of a mid-rise apartment building, those impacts would be traffic, shadows, privacy, and visual impact. A shadow study has been provided in support of the Proposed Development which shows that the tallest building, which is Building D, may cast a partial shadow on 467 Peel Street. This shadow only occurs for a brief period shortly before midday around the winter solstice. The extent of the shadow only impacts the south portion of the lot, and the north half is unimpacted. Given that the residents are not typically spending time in their rear yard around the winter solstice, the impact on the enjoyment and usability of this lot should be unaffected, and there are no shadow related concerns for Building D.

Buildings A, B, and C were not included in the shadow study per direction from Beckett Frisch in the spring of 2025 who indicated that the angular plane studies were sufficient for these 3 buildings. The rationale for requiring a shadow study for Building D was due to the fact that a portion of the building exceeds the 45 degree angular plane, whereas the other buildings all fall within the angular plane.

The Zoning By-law requires 0.75 parking spaces per unit which would amount to 184 total parking spaces. The proposed Site Plan provides 240 parking spaces, and as such, has a parking surplus to ensure that there are no off-site parking impacts to the surrounding community.

The angular plane study provided in support of the Proposed Development has demonstrated that the limited height and large setbacks from adjacent residential uses will serve to protect the privacy of existing residents in the community. Although Building D exceeds the angular plane, it fully complies with the Town

of Collingwood's established setbacks for apartment buildings as set out in Table 6.3.1.2. It is assumed that for Zoning By-law 2010-040 to be in conformity with the Official Plan, as it must be, that these setbacks are considered to be sufficient to manage privacy concerns for apartment buildings adjacent to ground related residential uses.

"3.5(f) Compatible development shall be considered in the evaluation of all development proposals throughout the Town. The following shall be considered when evaluating the compatibility of development proposals:

- i. The use, height, massing, orientation and landscape characteristics of nearby properties are properly considered and appropriate transitions between the built forms and uses shall be ensured;*
- ii. On-site amenity space is provided and is reflective of, or enhances, the existing patterns of private and public amenity space in the vicinity; and*
- iii. Streetscape patterns, including block lengths, setbacks and building separations are generally maintained."*

The Proposed Development reflects many of the characteristics of the adjacent and existing apartment site to the immediate north. The buildings are predominantly 4 storeys in height and are approximately 20 m in width and 67 m in length. These sizes are replicated almost exactly in Buildings A, B and C. As such the massing of these buildings copies the massing of the existing development. Building D is slightly shorter in length, but includes an additional storey. Despite the increase in height for Building D, the overall volume, which could be considered as a way to measure massing, is nearly identical due to the decrease in building length.

The building orientation on the Subject Property is also similar to that of the adjacent and existing residential apartment site to the north, with buildings orientate parallel and adjacent to the side lot lines, and the buildings in the middle of the site being parallel to Peel Street and Pretty River. However, where the orientation differs is in regard to the lack of opportunity for a building to be located along the street frontage on the Subject Property, due to the presence of the single detached dwellings in the middle of, and dividing, the frontage.

Town planning staff have suggested that Buildings A and D be reoriented to along the road frontage in those locations. This is not feasible due to the limited building length that would be possible in this scenario. Both of these frontages are approximately 70 m in length, and once driveways, walkways and side yard setbacks are provided, the resulting building length would be only about 40 m at the most. This represents a reduction in building and construction efficiency that would impact the financial viability of the project.

Hard surface amenity space is proposed adjacent to Buildings A, B, and C. All buildings are connected to an internal circulation walkway system, which itself connects to the existing public walkway along the north property line, with access to the trail system along the Pretty River. This is consistent with the approach used for the existing apartment development to the north, however, that development does not appear to have any dedicated or programmed outdoor amenity areas.

Mid-Rise Buildings

"5.1.8.2(a) Where Mid-Rise Buildings are specifically identified as a permitted use within any Designation in this Plan, they shall be a minimum height of 3 storeys. Mid-Rise Buildings shall be a maximum height of 8 storeys, or 27

metres, whichever is less. Built forms that are considered to be Mid-Rise Buildings include:

- i. Block, stacked and street townhouses;*
- ii. Apartment buildings;...”*

The Proposed Development is comprised of 4 apartment buildings of 4 and 5 storeys, with a maximum height of 14.9 m, and would comply with the Mid-Rise Building description provided above.

- “5.1.8.2(b)** *The Town may identify sites for the development of Mid-Rise Buildings within the Zoning By-law. When a site specific Zoning By-law is under consideration to permit new Mid-Rise Buildings, the proposed development must meet the following criteria, to the satisfaction of the Town:*
- i. Be compatible and can be sensitively integrated with the surrounding land uses. Special measures, such as angular planes, increased building setbacks, or enhanced landscaped buffer strips may be required in order to ensure sensitive integration;*
 - ii. Be on a site of suitable size for the proposed development, and provide adequate landscaping, amenity features, buffering, on-site parking and garbage pickup and recycling services;*
 - iii. Be located in proximity to parks, open space and other community facilities, services and amenities;*
 - iv. Have access to utilities and municipal service infrastructure that can adequately serve the proposed development;*
 - v. Have frontage on a Collector or Arterial Road; and*
 - vi. Have convenient access to an existing or planned public transit stop.”*

The Subject Property is zoned R3-8, which permits apartment buildings, including mid-rise apartment buildings. As such, the Town has already identified this site for such uses. A site specific Zoning By-law is not required for the Proposed Development, and as such, this policy is not applicable. However, the design of the Proposed Development reflects most of the above criteria.

- Compatibility was previously established in the above discussion related to Policy 3.5, angular plane studies have been provided, and the standard apartment setbacks are implemented on the Site Plan.
- The Site Plan also includes 42.8% of the site area as landscaped open space, provided a substantial amount of landscaping, amenity space and buffers.
- The Subject Property is adjacent to the open space associated with the Pretty River, and is in proximity to Williams Park located on the west side of Peel Street across from the Subject Property.
- Municipal services were constructed under Peel Street during the development of Plan of Subdivision 51M-865.
- Peel Street is designated as a Collector Road on Schedule 6 – Transportation Plan of the Town of Collingwood Official Plan.
- There is a transit stop on Peel Street less than 400 m from the Subject Property.

- “5.1.8.2(c)** *Mid-Rise Buildings shall be developed at a maximum density of 3.5 Floor Space Index (FSI). For the purposes of this policy, a FSI is the ratio of*

grossfloor area of the proposed development to the net land area of the development site. For the purposes of this policy, net area means the identified property, less any lands within the Environmental Protection Designation, and less any lands used for utility corridors/pipelines, public or private road rights-of-way, lands identified for stormwater management facilities, and/or parks and open spaces dedicated to the Town.”

The net area of the Subject Property is 1.94 hectares and the total GFA is 17,366.57 m² which equals an FSI of 0.895 within the range allowable under this policy.

“5.1.8.2(d) For a Mid-Rise Building to achieve the identified maximum height, or density on any site, in any Designation in this Plan, the Town shall be satisfied that the building is compatible with, and can be sensitively integrated with the surrounding and abutting land uses. The key is the appropriate transition to adjacent uses and built forms and the Town shall require supporting studies, such as shadow assessments, and may implement special measures in the Zoning By-law, such as reduced building heights, angular planes, step backs, increased building setbacks, and/or enhanced landscape buffers to ensure sensitive integration.”

The Proposed Development does not seek to maximize the height or density that is established in the mid-rise policies as described in Section 5.1.8.2 of the Official Plan. The maximum density is 3.5 FSI, and the maximum height is 8 storeys or 27 metres. Whereas the Proposed Development FSI is 0.895, which is approximately 26% of the maximum, and the proposed height is approximately half of the permitted maximum. The R3-8 zone that was previously approved for the Subject Property provides reductions from these maximums in the Official Plan, and it is surmised these represent the “special measures” for reduced height, angular planes, and increased setbacks that are noted above.

“5.1.8.2(e) The Town shall encourage the use of underground and/or structured parking facilities for Mid-Rise Buildings.”

Underground parking is a significant construction expense, and would increase the overall project cost, and thus increase the cost at which these units could be sold or rented. It is acknowledged that some sites, locations, and projects may benefit from the provision of underground parking. However, the Proposed Development does not include a sufficient number of units to justify the inclusion of underground parking. It is assumed that the preference for underground parking is based on a combination of factors including urban design, water balance, and land use efficiency. In an attempt to partially address these underlying objectives, parking for Building D is incorporated under the building, but at grade. This strategy for parking, represents a lower impact to construction costs, while still serving to somewhat limit the amount of paved and impervious area on the Subject Property.

Further rationale for avoiding underground parking is due to the presence of a high groundwater table, as discussed in the Preliminary Geotechnical Investigation prepared by Orbit Engineering and dated February 2, 2016. The initial groundwater readings for the Subject Property were between 1.2 and 2.0 m below grade and were measured in November and December of 2015. These readings do not necessarily reflect the seasonal high groundwater levels that may occur in the spring, and as such, the actual high groundwater levels could be even closer to the surface. High groundwater increases the cost and difficulty of underground parking, requiring either permanent dewatering or a fully waterproof (bathtub construction)

parking garage. Both of those options have additional cost and negative impacts.

It is our opinion that the Proposed Development conforms with the above noted Official Plan policies.

Summary

The proposed Site Plan for Block 151 on Registered Plan 51M-865 is in full conformity with the Zoning By-law as reviewed on drawing A-1.1 of the architectural Site Plan drawing set prepared by RDPS Integrated Design Firm. As such, it can be inferred that if the Zoning By-law conforms with the Official Plan, a Site Plan that complies with the Zoning By-law would also conform with the Official Plan.

However, the Town of Collingwood requested a scoped policy review to discuss a few specific policies. The requested policy analysis above further supports the position that the Proposed Development conforms with the Official Plan.

It is my Professional Planning Opinion that the proposed Site Plan represents good planning and is appropriate for the subject property.

Yours Truly,

ROBERT RUSSELL PLANNING CONSULTANTS INC.



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President