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August 9, 2021

via email

Councillor Jim Neill, Chair  
Planning Committee  
City of Kingston  
216 Ontario Street  
Kingston, ON K7L2Z3

**Re: Central Kingston Growth Strategy – PC-21-052**

Dear Councillor Neill:

The FHF has monitored the progress of this study since 2018. The Foundation provided comments in July 2020, and received responses from staff. We have three major concerns, first, related to timing of this report, the second being a procedural one, in terms of the wording of the staff recommendation and some of the elements of the proposed changes, and the third one, in terms of the heritage considerations which are referenced in Exhibit D to the WSP report, entitled Urban Design Guidelines.

**1. Timing**

The staff report involves 303 pages and includes a great deal of information for anyone to analyze between Friday before the Planning Committee meeting to the following Thursday, August 12. To add to this, the report comes forward during the summertime when many people are out of town.

**2. Staff Recommendation**

The staff report recommendation states: *That the Central Kingston Growth Strategy Final Recommendations Report, dated July 2021, the Servicing and Infrastructure Assumptions, and the Transportation Review of Intensification Areas (Exhibits A, B and C to Report Number PC-21-052 be approved.*

Exhibit A is the main WSP report, p. 15 to 253 of the package which includes the Urban Design Guidelines; Exhibit B, Assumptions for the Servicing and Infrastructure Assessment, p. 253 to 257; Exhibit C, Transportation Review of Intensification Areas, p. 258 - 276. What exactly is Planning Committee being asked to approve?

Exhibit A, Policy Recommendations, includes two major components, Official Plan recommendations, and Zoning by-law proposals. The Near Campus Neighbourhoods will have a section of the Official Plan to deal with development, a new S. 10G. (included as Appendix C). It would appear from p. 5, last para.) of the staff report, this will proceed via an OPA in the fall of 2021. Does a Committee/Council approval endorse these recommendations without a broader public consultation? This is unclear.

Also, page 5 of the staff report indicates that WSP prepared a Strategic Directions report, which does not appear in the report's Table of Contents. Elsewhere it is noted that such amendments (to Section 2 of the OP) will be processed during the next OP Update. This should be clarified for the Committee.

The Foundation has two areas of concern with respect to the proposed intensification sites. The first relates to the proposal for 6-storey structures adjacent to Victoria Park. There have been discussions about designating this park under the Ontario Heritage Act, as the park opened in 1892. The Committee will recall that the City recently installed the first piece of public art in 40 years there. Placing 6-storey buildings on the east and west sides of this park would without question reduce the open space appeal of this area. If one looks at the 4-storey development at MacDonnell and Johnson Streets, this built form is compatible with the surrounding residences. In our view, 6 storey development is not appropriate near Victoria Park.

The second concern relates to the Bath Road sites. Proposing redevelopment of the YMCA site on Bath Road (across the street from the Kingston Centre) along with two nearby churches is not in the public interest, in our view. The YMCA is one of the important amenities that draw people to this geographic node. Assigning density to church sites is also questionable.

The second main component of Exhibit A involves recommendations for the new Zoning By-law. As the second draft of the zoning by-law was released last week for public consultation through to early November, it appears that Planning Committee is being asked to support the inclusion of these provisions for further public consultation. An outright approval by the Committee is premature in our view.

As for Exhibits B and C, it is unclear what an approval by Committee or Council means, nor is the staff report clear on this matter. The staff report seems to indicate that these memos provide interim information at best.

**3. Central Kingston Neighbourhoods Urban Design Guidelines**, (Appendix D of Exhibit A, p. 171 – 252), is included in the main WSP report, so clearly these guidelines are included in the recommendation to the Planning Committee.

We recognize that the form of public engagement has been varied, with a reliance on receiving input on an ongoing basis from a community working group. From the report, there appears not to have been any consultation with the Heritage Kingston Committee, and this is an important step in the process, especially since there are many heritage considerations noted for the Sydenham Heritage District, and for other neighbourhoods in the study area.

Further, this set of Urban Design Guidelines has not been released for review to the general public to our knowledge. Given the complexity of the Guidelines and its relation to provisions of the draft zoning by-law, this should be done.

A third concern is that there are two existing sets of Urban Design Guidelines currently referenced in the City's Official Plan, which apply to the study area. See S. 8.2 of the Official Plan which refers to Design Guidelines for New Communities, and S. 8.3 which refers to Design Guidelines for Residential Lots. There is likely to be much overlap between these documents, particularly the Guidelines referenced in S. 8.3 of the Official Plan. Has this been reviewed?

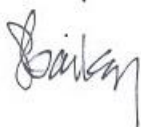
The staff report states that the urban design guidelines will be further reviewed in the context of the next Official Plan review, which is not scheduled for several years. Therefore, what status does a Committee/Council approval give this document?

In summary, this major work being undertaken by the City is deserving of more consideration by Planning Committee, in our view. At the least, the recommendation before Committee should be clarified to indicate that the approval is subject to a number of future actions by the City, all of which will require further public consultation.

A number of our board members are not available this week to present these comments via zoom, but we do hope that the Committee members and staff will consider these comments.

Thank you for this opportunity to comment on the CKGS proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Shirley Bailey". The signature is written in a cursive, flowing style.

Shirley Bailey, President  
Frontenac Heritage Foundation

cc. Planning Committee members and staff