

**COMMISSIONER'S REPORT ON THE
ST. JOHN'S MUNICIPAL PLAN
AMENDMENT No.147, 2020**

and

**ST. JOHN'S DEVELOPMENT REGULATIONS
AMENDMENT No. 680, 2020**

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Commissioner**

April 17, 2020

Table of Contents

1.0 INTRODUCTION.....	1
1.1 THE ISSUE	3
2.0 BACKGROUND.....	3
2.1 THE APPLICATION	3
2.2 THE REVIEW PROCESSES	4
3.0 WRITTEN SUBMISSIONS RECEIVED IN ADVANCE OF THE HEARING	16
4.0 THE HEARING	17
4.1 OVERVIEW OF THE APPLICATION	18
4.2 PRESENTATION ON BEHALF OF THE APPLICANT	19
4.3 OVERVIEW OF THE SUBMISSIONS	20
4.4 PRESENTATIONS BY THOSE IN ATTENDANCE	20
5.0 CONSIDERATIONS	25
5.1 CONSISTENCY WITH THE ST. JOHN’S MUNICIPAL PLAN	25
5.1.1 <i>The City of St. John’s Vision</i>	25
5.1.2 <i>Urban Form</i>	25
5.1.3 <i>Commercial Land Uses</i>	26
5.1.4 <i>Designation of the Subject Property</i>	27
5.1.5 <i>Planning Areas</i>	28
5.2 THE ST. JOHN’S DEVELOPMENT REGULATIONS	29
5.2.1 <i>Proposed Amendments</i>	29
5.2.2 <i>Zoning Considerations</i>	30
6.0 CONCLUSION	35
6.1 CONSISTENCY WITH THE ST. JOHN’S MUNICIPAL PLAN	35
6.1.1 <i>Mitigation of Impacts in Relation to the Amendments</i>	36
7.0 RECOMMENDATIONS.....	37
APPENDIX “A” – TERMS OF REFERENCE FOR THE LAND USE ASSESSMENT REPORT	39
APPENDIX “B” – WRITTEN SUBMISSIONS (PRESENTED AS A SEPARATE DOCUMENT)	42

1.0 INTRODUCTION

At the Regular Meeting of the St. John's Municipal Council ("Council") held on February 17, 2020, I was appointed as the Commissioner to conduct a public hearing and prepare a report with recommendations with respect to proposed text and map amendments to both the St. John's Municipal Plan (*Amendment Number 147, 2020*) and the St. John's Development Regulations (*Amendment Number 680, 2020*). The intent of these amendments is as follows:

St. John's Municipal Plan (*Amendment Number 147, 2020*)

1. Amend Section 3.3.6 A.P. Parking Garage District by removing the following Building Height and Bulk subsection:

"Building Height and Bulk – In this District, the maximum building height is limited to 11 Storeys and the maximum Floor Area Ratio is limited to 2.25."

2. Amend Map III-2 (Downtown Building Control Map) by substituting the property at 1 Clift's-Baird's Cove (Parcel ID #34257 and 139734) as follows:

"Areas allowing a building height not exceeding 12 storeys/47 m and a floor area ratio not exceeding 2.5."

St. John's Development Regulations (*Amendment Number 680, 2020*)

1. Amend Section 10.51.2 Discretionary Uses by adding the following:

"(d) Office
(e) Retail Store"

2. Repeal Section 10.51.3(a) and substitute the following:

"Building Height (maximum): 12 storeys (not exceeding 47 metres)"

3. Repeal Section 10.51.3(c) and substitute the following:

"Floor Area Ratio (maximum): 2.5"

4. Amend Map F (Downtown Building Control Map) by substituting the property at 1 Clift's-Baird's Cove (Parcel ID #34257 and 139734) as follows:

"Areas allowing building height not exceeding 12 storeys/47m and a floor area ratio not exceeding 2.5"

These proposed text and map amendments for 1 Clift's-Baird's Cove are in response to an application from John Hearn Architect Inc., on behalf of the property owner, Sonco Group Inc., to accommodate a 12-storey parking garage and hotel on the subject property.

It is important to state that the St. John's Municipal Plan must conform to the St. John's Urban Region Regional Plan (SJURRP), which was adopted by the Province in 1976. This Plan applies to all land in the St. John's Urban Region, which is essentially the Northeast Avalon Peninsula. The SJURRP is the Province's principal document for determining land use and development in the Urban Region. It distinguishes between urban and rural areas, and provides protection for the Urban Region's agricultural area, resource areas and designated scenic roads. It is the framework within which municipal plans are prepared by municipalities on the Northeast Avalon.¹

My appointment as Commissioner was made by Council under the authority of Section 19 of the *Urban and Rural Planning Act, 2000*, with the accompanying duties established in Section 21(2) and 22(1) which note that the Commissioner is to "[...] hear objections and representations orally or in writing [...]" and, subsequently, to submit a written report on the public hearing including recommendations arising from the hearing.

This public hearing was scheduled for 7 p.m. on Wednesday, March 11, 2020, at St. John's City Hall. Prior to this date, and as required by legislation, the hearing was advertised in the February 22 and 29, and March 7, 2020 editions of The Telegram. Additionally, the amendments were publicized on the City of St. John's website (<http://www.stjohns.ca/public-notice/public-hearing-1-clifts-bairds-cove>). Notices also were mailed out, as required, to all property owners within a minimum radius of 150 metres of the subject property. This notice provided a site plan and advised of the date, time, location, and purpose of the upcoming public hearing.

The public hearing was convened on Wednesday, March 11, 2020 at 7 p.m. in the Foran/Greene Room of St. John's City Hall. There were 21 interested persons in attendance, as well as two representatives of the applicant, two City staff and Your Commissioner. Assistance at the meeting was provided to Your Commissioner by the following City staff: Ann-Marie Cashin, MCIP - Planner III, Urban Design & Heritage, and Ken O'Brien, MCIP, Chief Municipal Planner, both from Planning, Engineering and Regulatory Services.

Prior to this hearing, 25 written submissions were received. Your Commissioner allowed one additional submission, which was referenced at the hearing and provided the next day. In total, 26 submissions were received. These submissions are referenced in this report under the section "Written Submissions Received in Advance of the Hearing" (see Section 3.0) and the full text of each submission is found in Appendix "B", which is provided as a separate attachment.

¹ City of St. John's. St. John's Municipal Plan (June 2007). Section I -1.4 Relation to Other Levels of Planning. Pg. 1-4.

No formal/taped transcript of the public hearing was made, and the notes made by Your Commissioner constitute the record of the hearing. All those requesting the opportunity to speak were accorded that right.

1.1 The Issue

The issue for Your Commissioner and the topic for the hearing was whether or not the following two amendments should be approved. In general, the intent of the amendments are:

- **St. John’s Municipal Plan (*Amendment Number 147, 2020*)** – the intent of which is:
 - To remove the Building Height and Bulk subsection from the A.P. Parking Garage District, which references the maximum building height as being limited to 11 storeys and a Floor Area Ratio limited to 2.25; and
 - To amend the relevant Downtown Building Control Map Ill-2 as required to reflect that the District would allow a building height not exceeding 12 storeys/47m and a Floor Area Ratio (FAR) not exceeding 2.5.
- **St. John’s Development Regulations (*Amendment Number 680, 2020*)** – the intent of which is:
 - To increase the maximum building height in the A.P. Parking Garage Zone from 11 to 12 storeys (not exceeding 47m) and the Floor Area Ratio from 2.25 to 2.5;
 - Amend the relevant Downtown Building Control Map “F” as required to reflect these changes; and
 - Add “Retail” and “Office” as Discretionary Uses in the A.P. Parking Garage Zone.

2.0 BACKGROUND

2.1 The Application

The process leading to the hearing on the proposed amendments was triggered by an application from John Hearn Architect Inc., on behalf of the property owner, Sonco Group Inc., to accommodate a 12-storey parking garage and hotel at 1 Clift’s-Baird’s Cove. The hotel would be 4-storeys above the existing 8-storey parking garage for a total of 12 storeys and a height of 46.8 metres. The proposed name of the hotel is “The Parkhotel”, and it would adjoin Atlantic Place.

The hotel would include 108 hotel rooms in a variety of sizes, a restaurant and lounge, multi-purpose room, gym, and sauna. The proposed development would result in the existing parking garage being renovated and screened.

The properties surrounding 1 Clift’s-Baird’s Cove (which is in the A.P. Parking Garage Zone), including along much of Harbour Drive, are primarily located within the Commercial Central

Retail (CCR) Zone. The Court House is in the Institutional (INST) Zone, along the harbour is Industrial General (IG) and, like the parking garage, Atlantic Place has its own Zone – Commercial Atlantic Place (CAP) Zone.

2.2 The Review Processes

The following provides an overview of the relevant correspondence and activity related to the processing of the application for 1 Clift's-Baird's Cove from John Hearn Architect Inc., on behalf of the property owner, Sonco Group Inc.

August 28, 2018 – Correspondence from Ann-Marie Cashin, MCIP- Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services, to the Committee of the Whole

This correspondence to the Committee of the Whole outlined proposed text amendments to the St. John's Municipal Plan and Development Regulations related to the application for a 12-storey parking garage and hotel at 1 Clift's-Baird's Cove. In addition, the correspondence detailed planning and other considerations relative to this proposal, as well as recommendations for moving forward.

Background on the application

John Hearn Architect Inc., on behalf of the property owner, Sonco Group Inc., had applied for a text amendment to both the St. John's Municipal Plan and Development Regulations to accommodate a 12-storey parking garage and hotel at 1 Clift's-Baird's Cove. At the time of this correspondence, it was stated that there would be a 4-storey hotel above the 8-storey parking garage, which would include 106 hotel rooms, a restaurant with a lounge and other amenities.

Planning and zoning considerations

Under the St. John's Municipal Plan, the subject property is designated the A.P. Parking Garage District; under the St. John's Development Regulations, the subject property is zoned A.P. Parking Garage. The maximum allowable building height in this District and Zone is 11 storeys. The applicant wishes to build a 4-storey hotel above the existing 8-storey parking garage for a total of 12 storeys and a height of 46.8 metres, and therefore amendments are required. Of note, a hotel located on the 9th and/or higher storey of a building is a Discretionary Use in the A. P. Parking Garage Zone.

While the subject property is located within Planning Area 1 - Downtown, it is not located within the Heritage Area, and so heritage area standards and designs are not applicable to the development. The proposed development includes renovating and screening the existing parking garage; however, the design (conceptual at that time) was to be finalized at the development stage.

It was highlighted that for this application to proceed, there were two aspects of the District and Zone which required amendment: the maximum permitted height and the number of required public parking places, as discussed below.

Building height and bulk

Under the current A.P. Parking Garage District and Zone, the maximum building height is 11 storeys and the maximum Floor Area Ratio (FAR) is limited to 2.25. The proposed height of 12 storeys will bring the building to a similar height as the adjoining Atlantic Place but will not exceed its height. The proposed development meets the requirements of the Floor Area Ratio (FAR) in the existing zone. The relevant Downtown Building Control maps in the Municipal Plan and Development Regulations would also need to be amended to reflect the increase in height.

The applicants have designed the hotel to step back from the parking garage along Harbour Drive, which breaks up the mass of the building and creates a more interesting façade. The existing and proposed building only has a small alleyway fronting onto Water Street, so the existing commercial buildings along Water Street will act as a step back and will maintain the pedestrian scale of the street. There are portions of the hotel which are proposed to extend over the sidewalk along Harbour Drive and Clift's-Baird's Cove. If this design proceeds, any encroachment over City-owned land will require Council's approval and a lease of air rights from the City's Legal Department.

It was stated that, if the amendments were to proceed, consideration in the final design should be given to the public realm and the relationship between the building, surrounding streets and sidewalk and the users of the parking garage and hotel. As per Section 6.1.7 of the draft Envision Municipal Plan, adopted-in-principle by Council, the City will encourage new developments and redevelopment that contribute to the public realm through architectural design, particularly in areas of heavy pedestrian traffic such as commercial areas, intensification areas and the Downtown, and provide connections designed to encourage pedestrian and cycling activity.

Parking

On January 21, 2013, an agreement was signed between the City of St. John's and Sonco Group Inc. stating that the public parking spaces located in the A.P. Parking Garage would not be reduced below 670 public parking spaces. This requirement was also established in the A.P. Parking Garage Zone in the Development Regulations. This Zone, as described in Section 10.51.3(b), identifies that:

- (i) Discretionary Uses that may be approved in the Zone are subject to the proviso that any such approved Discretionary Use shall be developed, undertaken, maintained, and used in such a manner that Publicly Available Rental Parking Spaces on the 1st through 8th Storeys of the Building shall not number less than 670; and

(ii) For the purpose of the A.P. Parking Garage Zone, Publicly Available Parking Spaces shall mean parking spaces that are available to the general public for rental on an hourly, daily, or monthly basis. The foregoing shall not include any parking spaces that are otherwise required by the Regulations in relation to any other Discretionary Use that may be approved in the Zone.

The existing parking garage contains 720 parking spaces. The proposed renovations were noted to reduce the total available parking spaces to 700. The parking requirement for 106 hotel rooms plus the other amenities is 50 parking spaces. The proposed hotel creates a shortfall of 20 public parking spaces from the required 670. As per Regulation 9.1.2, this property was not eligible for parking relief (at the time the correspondence was drafted).

However, this correspondence identified that the applicant could:

- (1) Provide a cash-in-lieu payment for the on-site, off-street parking spaces required,
- (2) Provide permanent or long-term off-site, off-street parking at a location acceptable to Council,
- (3) Provide a combination of cash-in-lieu and off-site parking.

The applicants had indicated that there are a substantial number of unused and available parking spaces in the parking garage in recent years that will accommodate the shortfall of 20 parking spaces for the hotel use. Given this information, the parking garage would likely be able to accommodate the hotel parking demands. However, to allow this shortfall, the City would have to amend the legal agreement between the City and Sonco Group Inc. and reduce the number of public parking spaces required in the A.P. Parking Garage Zone. It was stated that traffic was being reviewed by staff and revisions might be required prior to development, if the amendment proceeded.

There was some concern about setting a precedent by adjusting the parking agreement. However, given the applicant demonstrated that the parking garage had sufficient unused parking spaces, it was not considered appropriate for the City to require off-street parking elsewhere, or cash-in-lieu. Rather, it was stated that from a planning perspective, if the application were to proceed as designed, it was recommended to amend the parking agreement for the total 20 spaces required to ensure that the parking requirements for the hotel were met.

It also was noted that, while there may still be a public perception that there is a lack of parking in the Downtown, since 2013 when this agreement was put in place, the City had cost-shared 461 additional parking spaces between the 351 Water Street Parking Garage and the Duckworth Street Parkade.

Overall considerations and/or implications for the City

In terms of key considerations and/or implications for the City, the following were identified:

- *Partners or Other Stakeholders:* Property owner and neighbouring property owners, as well as people who park their vehicles in the A.P. Parking Garage.
- *Alignment with Strategic Directions/Adopted Plans:* *A City for All Seasons* - Support year-round tourism and industry activity.
- *Legal or Policy Implications:* Text amendments to the St. John's Municipal Plan and Development Regulations are required
- *Engagement and Communications Considerations:* Public notice of the proposed amendment and a public meeting chaired by an independent facilitator.

There were no budget/financial, human resource, procurement, information technology or other implications.

Recommendations

It was recommended that the proposed text amendment to enable a maximum height of 12 storeys in the A.P. Parking Garage District and Zone be considered.

It was also recommended that the proposed amendment to the legal agreement between the City of St. John's and the property owner and applicant, Sonco Group Inc., to reduce the number of required public parking spaces from 670 to 650, be considered.

Finally, it was recommended that the application be advertised for public review and comment along with the Discretionary Use of a Hotel. It was further recommended that the application be referred to a public meeting chaired by an independent facilitator. Following the meeting, the application would be referred to a regular meeting of Council for consideration of adoption.

September 17, 2018 – Correspondence from Ann-Marie Cashin, MCIP- Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services, to the City of St. John's Mayor and Council

This correspondence once again outlined the background to the application for the 12-storey parking garage and hotel at 1 Clift's-Baird's Cove, the amendments required to both the St. John's Municipal Plan and Development Regulations to allow the application to proceed, relevant implications, as well as recommendations for moving forward.

This correspondence also discussed the requirement for a Land Use Assessment Report (LUAR) and noted that the application had been referred to the Built Heritage Experts Panel as directed by Council during the Committee of the Whole meeting held on September 12, 2018.

Land Use Assessment Report

As per Section 5.6.3 of the St. John's Development Regulations, "*Council may require a Land Use Assessment Report to evaluate any proposed land use, development and/or situation that affects the policies contained in the Municipal Plan.*" As the amendments under consideration would allow a change in height and may impact the overall character of the area, it was recommended that an LUAR be undertaken. The Terms of Reference for the LUAR were attached to this correspondence and are found in Appendix "A". of this report.

Recommendations

Based on the requirement for the LUAR, the recommendations were revised slightly from the August 28, 2018 correspondence detailed previously, as follows:

- It was recommended that the proposed text amendment to enable a maximum height of 12 storeys in the A.P. Parking Garage District and Zone be considered, and the Terms of Reference for the LUAR be approved.
- It was recommended that, on receipt of a satisfactory LUAR, the application be referred to a public meeting chaired by an independent facilitator and the Discretionary Use of a Hotel be advertised for 1 Clift's-Baird's Cove.
- It was recommended that the proposed amendment to the legal agreement between the City of St. John's and the property owner and applicant, Sonco Group Inc., to reduce the number of required public parking spaces from 670 to 650, be considered.

November 2019 – "Parkhotel" Land Use Assessment Report (LUAR) – prepared by Partisans and John Hearn Architect for Sonco Group Inc. *(Note: this document, which is available online, was revised from an earlier draft - that had a slight error, and submitted to the City of St. John's Planning, Engineering and Regulatory Services.)*

As stated previously, the City required an LUAR to be completed for the proposed development for 1 Clift's-Baird's Cove. Formerly known as a Land Use Impact Assessment, and as defined in the St. John's Development Regulations, an LUAR is "any study prepared by a suitably qualified person who is a full member of the professional society or societies that licence or recognize practitioners in the field and who has had experience directly related to the matter at hand to assess any significant impacts a use or development may have on the urban environment and/or the quality of life of its citizens."

The City also stipulated the Terms of Reference for this LUAR (see Appendix "A"), as per the September 17, 2018 correspondence. In particular, the applicant was to identify significant impacts on land uses adjoining the subject properties and, where appropriate, also identify measures to mitigate these impacts.

The LUAR presents an introduction to, and overview of, the proposed redevelopment, as summarized below.

In terms of the vision for the project, it is felt that the time and environment are right for the Parkhotel, and that the development under consideration can help to drive local economic prosperity and tourism. “By augmenting weekend and after-work uses in the area with the introduction of a hotel, creating a more welcoming approach for tourists coming from the port, providing new retail and/or tourist information space at the corner of Clift’s-Baird’s Cove and Harbour Drive, and improving the public realm with new sidewalk treatments and furniture, the Parkhotel proposal has a lot to offer the city.”

A. Building use

The proposed development is anticipated to have three uses:

- Hotel – a 4-storey hotel on top of the existing A.P. Parking Garage will house three floors of hotel rooms (108 in total) with the top floor housing the lobby, lounge, and other amenities.
- Retail/Tourist Information – The proposal includes new ground-level retail or tourist information space at the corner of Clift’s-Baird’s Cove and Harbour Drive.
- Parking Garage – The existing parking garage will be retained with some changes proposed to accommodate the functioning of the proposed hotel. There will be new cladding for the parking garage to improve its appearance and to help with garage maintenance.

The LUAR presents the existing and proposed Gross Floor Area and identifies that there will be a slight increase in the Floor Area Ratio (FAR), from 2.25 to 2.42.

B. Elevation and building materials

Parkhotel is described as being inspired by the distinct character of St. John’s and “composed of a series of colored volumes drawn from the iconic streetscapes of the city and harbour.”

Further to the addition of the new cladding for the parking garage, in lieu of designing a graphic as part of the project, it has been decided to offer the City the garage screen as a blank canvas for possible involvement of the local Arts community. The applicant would like to have input into the final selected piece, if the City engages an artist through a competition.

The proposed screen wrapping the garage would be a perforated, power-coated white metal. The perforations would allow the garage to vent naturally without the need for mechanical ventilation. In addition to providing a new image for the garage, it also would provide a degree of protection from the elements for the structure and parking garage users. This new garage screen wall assembly will be slimmer than the existing masonry construction and so will not extend past the existing brick wall and will stay within the existing property line.

The colour scheme is stated to be drawn from the “bold, bright colours of the city’s famous clapboard houses, placing Parkhotel at home with its city background.” It is noted that there

could be other colour palettes and that the colours for the hotel can develop as the project progresses.

C. Building height and location

- **Setbacks and Encroachments** – The proposed addition is located at the far east side of the property, resulting in a large setback from the buildings along Water Street. The hotel volume also is set back from Harbour Drive and extends beyond the northern property line and slightly at the southern property line. The proposal calls for three signs which also extend beyond the property lines. The encroachments arising from both the building and the signage will result in a need for Air Rights Agreements.
- **Shadowing** – It is stated that the proposed development will result in only minor increases in shadows cast on adjacent public and private properties. In early afternoon, the shadows already cast by the parking garage will be slightly extended by the added height of the hotel. During the summer, most of this additional shading is reported to be limited to Clift's-Baird's Cove and Harbour Drive.
- **Building Height** – The proposed building does not exceed that of the adjacent Atlantic Place office building.
- **View Planes** – The submission contains a number of view plane images from specific areas of the Downtown and immediate surrounding areas, including the view from the harbour.

D. Exterior equipment and lighting

Enhanced lighting is proposed for the public spaces immediately adjacent to the property. To minimize impacts on adjacent properties, site lighting will be designed to provide a safe and inviting atmosphere for the sidewalks adjacent to the property without creating unnecessary glare or excessive light. There will be illuminated hotel signage on the canopy above the new entrance on Clift's-Baird's Cove and vertically along the elevator shaft.

E. Landscape and buffering

Arising from the development, there will be expanded sidewalks, new street furniture and decorative pavers. There will be landscaping incorporated on the sidewalks adjacent to the property, along Clift's-Baird's Cove and Harbour Drive. Moveable furniture would be along Harbour Drive; this would be stored in the winter to accommodate snow clearing. The existing 2 metre sidewalk on the Harbour Drive side will be expanded to 3 metres. Also, the existing electrical transformers will be screened.

F. Building wind generation

It is anticipated that there will be negligible wind effects on adjacent streets, sidewalks and building entrances. It is stated that the discontinuity of surface between the exterior walls of the

proposed hotel and the existing parking garage, along with the distance between the new development and the ground, will limit the impact of the proposed hotel on ground-level wind patterns.

G. Snow clearing/Snow storage

The addition of the screen to the A. P. Parking Garage as part of the Parkhotel proposal is expected to greatly reduce the amount of snow accumulation inside the garage and reduce the need for snow clearing operations. Existing snow-clearing practices are expected to be required less frequently.

H. Off-street parking and site access

- Off-street parking - Parking for the hotel will be accommodated within the existing and surplus off-street parking at the A.P. Parking Garage. The applicant is requesting parking relief (21 spaces) from Council for this proposed development, but it is anticipated this will not impact the capacity of the parkade, which is reported to be underutilized in recent years. Additionally, hotel demand is described as greater during evenings and weekends, while public parking demand is greater during weekday working hours.
- Site access – Changes to vehicular circulation are proposed for the ground level of the garage. This would include a turn-around and drop-off for hotel patrons which circles around the new hotel entrance, as well as a new single-lane exit at Harbour Drive relocated from the existing two-lane exit at Clift's-Baird's Cove. This is to provide room for the new retail and tourist information space. Loading for the hotel is proposed for the southwest corner of the site near the existing Link Building on City-owned property.

I. Municipal water and sewer services

Requirements in relation to water, sanitary sewer and storm water runoff are anticipated to be addressed by connection to and/or through existing infrastructure. It is noted that the applicant will be providing backflow prevention devices on services in recognition that the existing storm and sanitary systems along Harbour Drive have hydraulic grade lines and, under high rainfall events and tidal conditions, the systems are known to become pressurized.

J. Traffic

The Parkhotel is not expected to significantly impact traffic or parking availability. It is felt that when the demand for hotel parking is high (evenings and weekends), the demand for public parking will be low; when the demand for public parking is high (daytime/weekdays), the demand for hotel parking will be low.

K. Public transit

There is no public transit infrastructure requirement for this property/development.

L. Construction timeframe

It is stated that Marco will work with the City during construction of the hotel to ensure impacts on traffic and pedestrian flows will be minimized. They are cognizant that there is important activity associated with their area (e.g., cruise ship arrivals) and so will develop and submit a traffic control plan to the City and will be onsite during street closures to ensure all measures are in place for pedestrian and vehicular safety and control. Further, they will use the top floor of the current parking garage outside of the new developed area as a laydown and staging area for construction where possible, with a crane in place at the existing top level for installation, thereby allowing work to progress with no impact to the streets below.

Public Meeting for 1 Clift's-Baird's Cove – December 11, 2019

About 20 people attended a public meeting held at City Hall on December 11, 2019 to discuss the application for 1 Clift's-Baird's Cove. In advance of this meeting, there were over 30 submissions received with about three-quarters opposed and the remaining in favor. Reasons for opposition to the proposal included concerns re height, scale, aesthetics, as well as impacts on views and existing Heritage Areas in the Downtown, and/or loss of air rights. Those in favor said, for example, that the design is "modern, chic", it is a good investment in the Downtown, it will be a draw for the next generation of younger tourists, and/or will cover up the existing "eyesore". Three principals of properties in the Downtown were in support.

January 15, 2020 – Correspondence from Ann-Marie Cashin, MCIP- Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services, to the City of St. John's Mayor and Council

This correspondence once again outlined the background to the application, the amendments required to both the St. John's Municipal Plan and Development Regulations to accommodate the application, relevant implications, as well as recommendations for moving forward.

Information not provided previously or changes in what was discussed are highlighted below.

The application

This correspondence notes that there would be 108 hotel rooms instead of the previously cited 106. (This change was stated in the LUAR as previously discussed.)

It was identified that in order for the application to proceed, there were now three aspects of the A.P. Parking Garage District and Zone which would require amendment - the Floor Area Ratio (FAR), the maximum permitted height and the addition of proposed commercial/office uses.

Building height, bulk and design

As reiterated from earlier correspondence, the proposed height of the development of 12 storeys and 46.8 metres will bring the building to a similar height as the adjoining Atlantic Place but will not exceed its height. While earlier correspondence indicated that there would be no change in the Floor Area Ratio (FAR), this was amended slightly to state that there would be an increase from 2.25 to 2.5 arising from the addition of the extra storey to the Zone. To that end, the relevant Downtown Building Control Map in each of the St. John's Municipal Plan and Development Regulations would need to be amended to not only reflect the increase in height but also the Floor Area Ratio (FAR) increase.

As stated earlier, while the subject property is located within Planning Area 1 - Downtown, it is not located in the Heritage Area and, therefore, is not subject to policies in relation to heritage area standards and designs. However, Council did refer the application to the Built Heritage Experts Panel, as previously referenced, and could consider their comments. The Panel agreed that the design does make the development "stand out", as was intended by the developer. However, they suggested that the use of yellow should be muted to not detract from the heritage buildings on Water Street. They agreed that any mural/sculpture design on the south side should be meaningful and not appear as a billboard for advertisements or be illuminated. Any proposed art installation should be determined prior to development approval, as the applicant suggested that it could influence the use of color in the final design.

Finally, the Panel was noted to be appreciative of the pedestrian improvements on the ground floor which were cited to include a wider sidewalk, bike racks, benches and ground floor retail. The specifics of these improvements were to be determined at the development stages.

The inclusion of retail or similar uses would need to be added to the A.P. Parking Garage Zone.

Parking

As previously stated, the City of St. John's and Sonco Group Inc. had a signed agreement from 2013 stating that the number of public parking spaces located in the A.P. Parking Garage would not be reduced below 670. In the earlier decision notes to Council, it was stated that to provide parking relief this agreement would have to be amended; however, in the intervening period, Council had amended the St. John's Development Regulations to allow consideration of parking relief in the Downtown. Therefore, the agreement would not need amending.

The degree of parking relief changed slightly from earlier correspondence. It was stated that following renovations the parking garage will contain a total of 703 spaces (as opposed to the 700 referenced earlier). The parking requirement for 108 rooms (up from 106 rooms referenced in earlier correspondence) and the other amenities is 54 spaces (up from the 50 referenced

earlier). To meet the requirement of 670 public spaces, the applicant is requesting parking relief of 21 spaces – up from 20 spaces. However, it is noted that the information provided in the LUAR demonstrates that, arising from the number of unused spaces per day, the parking demand from the hotel could be accommodated.

Public consultation and submissions received

The correspondence reviewed the mixed reactions from those who provided submissions in advance of and/or who attended the December 11, 2019 Public Meeting.

It was highlighted that there were people for and against the proposal, with many of those against expressing concerns with the additional height, design, modern take on the building in relation to the area/detraction from the heritage character, colour and impact on views. Responses to specific concerns included:

- The Development Regulations were amended in 2014 to allow a maximum building height of 11 storeys, ensuring that the parking garage could not be higher than Atlantic Place. The current application meets the height intention.
- The property is not located within the Heritage Area and, so, relevant standards do not apply.
- Council does not regulate colour, but it is recommended that the applicant consider using an alternative colour palette.

Those who supported the proposal felt that it was a good addition to the Downtown, will improve the existing parking garage, has a unique design and/or provides a welcome addition in terms of the retail space.

Overall considerations and/or implications for the City

Finally, in terms of key considerations and/or implications for the City, the following were identified, with some changes from earlier correspondence.

- *Partners or Other Stakeholders:* Property Owner and neighbouring property owners, as well as people who park their vehicles in the A.P. Parking Garage, Downtown residents, visitors and businesses.
- *Alignment with Strategic Directions/Adopted Plans:* A Sustainable City – Plan for land use and preserve and enhance the natural and built environment where we live.
- *Legal or Policy Implications:* Text amendments to the St. John's Municipal Plan and Development Regulations are required, as well as amendments to the Downtown Building Control maps.
- *Engagement and Communications Considerations:* A commissioner's public hearing would be required.

There were no budget/financial, human resource, procurement, information technology or other implications.

Recommendations

The following recommendations were put forward:

- That Council adopt-in-principle the resolutions for the St. John's Municipal Plan Amendment 147, 2020 and St. John's Development Regulations Amendment 680, 2020, which would allow for a 12-storey parking garage (not exceeding 47 metres), hotel and commercial/office [space] at 1 Clift's-Baird's Cove.
- If Council were to adopt the amendments in principle, they were to be sent to the Department of Municipal Affairs and Environment with a request for provincial release. Following release, the amendments would be referred back to a future Regular Meeting of Council for consideration of adoption and the appointment of a commissioner to conduct a public hearing, as required by the Urban and Rural Planning Act.

As further recommendations, and as per some of the discussion above, it was recommended:

- That the applicant consider using an alternative colour palette as displayed on page 13 of the LUAR.
- That the design of the Harbour Drive façade be determined prior to the development approval.

January 29, 2020 – Correspondence from Ann-Marie Cashin, MCIP- Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services, to Kim Blanchard, MCIP, Department of Municipal Affairs and Environment

This correspondence presented the amendments related to the A.P. Parking Garage District and Zone and overviewed the process for the application to the date of the correspondence. It requested a Provincial review and release for Municipal Plan Amendment Number 147, 2020 and St. John's Development Regulations Amendment Number 680, 2020. It was stated that, upon issuance of the Provincial release, the amendments would be referred to Council for consideration of formal adoption and the appointment of a commissioner to conduct a public hearing on the amendments.

February 6, 2020 – Correspondence from Kim Blanchard, Senior Planner, Local Governance and Land Use Planning Division, Department of Municipal Affairs and Environment, to Ann-Marie Cashin, MCIP - Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services

This correspondence detailed that the Minister had reviewed and released the text and map amendments related to 1 Clift's-Baird's Cove - Municipal Plan Amendment 147, 2020 and

Development Regulations Amendment 680, 2020 in relation to the A.P. Parking Garage District and Zone to allow a maximum building height of 12 storeys.

This correspondence further noted that Council could now consider the documents for adoption and to schedule a public hearing.

February 13, 2020 Correspondence from Ann-Marie Cashin, MCIP- Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services, to the City of St. John's Mayor and Council

This correspondence once again outlined the background to the application, the amendments required to both the St. John's Municipal Plan and Development Regulations to accommodate the application, relevant implications, the mixed reaction received to the development as per submissions received for and comments provided at the December 2019 public hearing, as well as recommendations for moving forward.

Further, this correspondence informed the Mayor and Council that Provincial release had been issued for the St. John's Municipal Plan Amendment Number 147, 2020 and St. John's Development Regulations Amendment Number 680, 2020. As such, it was recommended that Council could proceed with the next steps in the process to adopt the resolutions for the amendments, appoint Your Commissioner, and proceed with the public hearing. It also was recommended that Council advertise the following Discretionary Uses in conjunction with the Public Hearing notification:

- A Hotel, located on the 9th or higher Storeys of a Building
- Office Use; and
- Retail Store.

3.0 WRITTEN SUBMISSIONS RECEIVED IN ADVANCE OF THE HEARING

As highlighted earlier, 26 written submissions (emails) were received for the hearing: 25 were received in advance of the hearing and one additional submission received the next day with the consent of Your Commissioner. All but one of the submissions were opposed to the proposed amendments for 1 Clift's-Baird's Cove. Given there is much duplication in relation to the types of concerns, the following provides a synopsis of some of the main issues as presented in the submissions. As previously referenced, the full text of each submission is found in Appendix "B" (provided as a separate document).

- The building will impede site lines to and from Clift’s-Baird’s Cove, in particular from the Court House on Water Street and the harbour. The increase in height will create a visual and physical barrier to the Downtown.
- There are concerns with the aesthetics of what is being proposed – e.g., the design and color, as well as placement, scale and form of the building, all of which are described as out of character with the surrounding Heritage Area.
- Urban design guidelines referenced in Envision have not yet been developed and, so, approving this application is premature. Similarly, Envision identifies that tall buildings should be sited to step down to lower-scale buildings: it is felt this proposal does not allow for this.
- Atlantic Place as it stands is “ugly” and an “eyesore”, but this not a sufficient reason to approve a development which could improve it.
- The proposed hotel is not aligned with the brand and image of the Downtown: the Downtown is a core and anchor attraction for the destination. The development should not be iconic in and of itself; rather, the history and existing structures are what are iconic. It will impact the identity and appreciation of several historic districts and sites in the vicinity (e.g., the Ecclesiastical District). It has not been developed based on national and international development and architectural standards for modern developments in historic settings.
- The overhang will impact buildings on Clift’s-Baird’s Cove in relation to, for example, shadowing. It is out of context with the Downtown Heritage Area and changes the atmosphere of the area.
- The air rights are not Council’s to give away; they belong to the citizens.
- The cladding for the parking garage will be another eyesore in the future, as it will degrade.
- Allowing this change in height could set a precedent for other buildings in the Downtown and in particular in the Heritage Areas.

One submission in favor of the proposed development was received from three principals of several properties on Water Street and/or Duckworth Street.

4.0 THE HEARING

Your Commissioner explained the intent of the hearing to those in attendance and spoke to the process to be undertaken during the course of same, i.e. presentation of the application by City staff and presentation by/questions from any in attendance who desired to express their support or objections/concerns regarding the amendments under consideration. Further, Your Commissioner reminded those in attendance at the hearing that the intent of the proceedings was to discuss the amendments and not to comment on the merits or lack thereof of the specifics of the proposed development.

Your Commissioner explained to those in attendance what was within her purview to consider and requested that they be respectful in their comments during the hearing.

4.1 Overview of the Application

Ms. Ann-Marie Cashin, MCIP - Planner III, Urban Design and Heritage, Planning, Engineering and Regulatory Services presented the proposed amendments to the St. John's Municipal Plan and St. John's Development Regulations in relation to 1 Cliff's-Baird's Cove.

Ms. Cashin explained that the purpose of the public hearing was to hear representations regarding the proposed amendments to the St. John's Municipal Plan and St. John's Development Regulations to allow a maximum height of 12-storeys and a maximum of 47 metres in the A. P. Parking Garage District and Zone. This change is proposed to accommodate an 8-storey parking garage and hotel at 1 Cliff's-Baird's Cove. The subject property is in a site-specific zone for the A.P. Parking Garage.

Ms. Cashin spoke to the relevant City policies and as such overviewed the following:

In the A.P. Parking Garage site-specific zone, the maximum allowable building height is 11 storeys. For the proposed development to proceed, the amendment would include an increase of the maximum building height from 11 to 12 storeys - a maximum height of 47 metres, an increase in the Floor Area Ratio (FAR) from 2.25 to 2.5 and an amendment to the Downtown Building Control maps in the St. John's Municipal Plan and Development Regulations.

There are Discretionary Uses associated with the development, which were advertised concurrently with the public hearing:

- A hotel located on the 9th and/or higher storeys of a building is a Discretionary Use in this Zone; and
- To accommodate a potential retail or tourist information space at the ground-level of the development, "Office" and "Retail Stores" would be added as Discretionary Uses in the Zone.

The property is not located within the Heritage Area and so is not subject to relevant standards. However, the application was referred to the Built Heritage Experts Panel, and Council can consider their comments prior to making a decision on the application. Ms. Cashin overviewed the Panel's comments as previously detailed herein.

There will be pedestrian improvements on the Harbour Drive side – a median and an extension of the sidewalk from 2 to 3 metres. These alterations were required by the City.

The applicant has requested parking relief of 21 spaces, in light of the need to maintain a minimum of 670 public parking spaces in the Zone.

The applicant has requested air rights, given the proposed overhang will extend over the sidewalk

Ms. Cashin finished by noting to those in attendance that following the hearing, Your Commissioner would prepare a report with recommendations for consideration by Council who can accept or reject the recommendations.

4.2 Presentation on behalf of the Applicant

John Hearn of John Hearn Architect Inc. and Anthony Novac of Sonco Group Inc. represented the applicant. They highlighted that the intent of the development is to try to improve a building, which is old, unattractive, and difficult to maintain, because it is open to the elements. They are looking to enclose the parking garage and increase the attractiveness of Clift's-Baird's Cove and Harbour Drive to pedestrians in the area and those entering from the harbour or Water Street.

They overviewed their application and proposal citing a boutique hotel with 108 rooms. They described that this will not be a 'cookie cutter' design but instead will be specific to the city in relation to, for example, arts, culture, and food. It was described as perfectly located to be an amenity that attracts national and international travelers and keeps them in the Downtown area.

It was stated that the proposal does not include large convention space recognizing there is an array of such space already in the Downtown area. They will, however, have food and beverage offerings.

It was noted that they have received positive and negative response on the colors as presented for the Parkhotel, and they are trying to choose colors which are recognizable for the city. The applicant remains open to adjustments on the proposed colors.

In relation to the cladding and the image which it will show, the example of the supply ship was just one to consider. The image on the screen will not be lit, and it will not display advertising imaging or be used as a billboard.

It was stated that there has been a lot of media about the proposed overhang for the development. They noted that it is tapered and so varies in distance from the structure, and hangs over the sidewalk, not the street.

They completed their remarks by stating that they want to build something to improve tourism and opportunities for the city, and they believe the proposal achieves this goal.

4.3 Overview of the Submissions

Your Commissioner explained that many submissions had been received from city residents in relation to the proposed amendments. She provided a summary of the comments, as presented in Section 3.0.

4.4 Presentations by those in Attendance

The following comments were provided by area residents and others who had concerns with the proposed amendments for 1 Clift's-Baird's Cove.

Speaker #1: This speaker asked if the representative of Sonco Group Inc. could provide additional information about the company and their headquarters.

Response from A. Novac: Sonco Group began in 1981. Initially, they represented the owners on a makeover of Atlantic Place and later came into possession of the garage. The company is headquartered in Halifax and owned by A. Novac's father. They are a land developer and have built, for example, shopping centres, hotels, and office towers. More recently, they have built 1718 Argyle in Halifax (office space) in partnership with a heritage and historic church, as well as casinos and hotels. They have Atlantic and broader Canadian development experience.

Later in the meeting, this speaker raised heritage and historical considerations related to the proposed development. They said that in the correspondence which Council has received from staff, the policy and implications section omitted information on the impact of this development on the historical environment in which it sits and, as well, did not identify other key stakeholders including the heritage groups, churches, and Parks Canada.

While not technically on the harbour, the proposed development will impact the viewsapes to and from Federally-designated sites and/or historical buildings and the harbor, in particular the Anglican Cathedral (in the Ecclesiastical District) and the Court House. This speaker highlighted that view planes are important for cultural industries and, again, they reiterated that there has been no consideration on these matters by Council. Further, they felt that the applicant should have consulted with historians and considered guidelines for new architecture in historical settings. Of note in relation to these guidelines, and in contrast to what is being proposed, the new development should not be iconic in its own right or supersede the iconic nature of the historic place.

This speaker said that the new development contradicts many of the directions in the Envision St. John's Draft Municipal Plan. As an example, it is said that there would be protection of the Ecclesiastical District, which this speaker feels is being breached with this proposal.

In conclusion, this speaker said that while this type of development might work in Halifax, it will not work in the Downtown and could set a precedent for other new development.

Speaker #2: This speaker owns and manages properties on Clift's-Baird's Cove and Water Street and had two concerns. They indicated it was difficult to tell how far the encroachment extended over the sidewalk into the Cove and wondered if it went out over the street.

Response from City staff: Currently, there is no further encroachment out into the Cove. There will be no expansion of the sidewalk or reduction in the pavement because these will support good traffic flow.

The second and related concern was that the hotel overhang is too large and impacts the streetscape. They said that the Cove is the widest and most distinctive in St. John's as compared to others. It provides a full view of the Court House – a historic building with a distinctive design, and a view up to the centre part of Downtown to the Anglican Cathedral. The view for tourists on tour boats and cruise ships will be impacted; those on the fourth or fifth deck of a cruise ship will be looking at the overhang.

This speaker highlighted that Heritage Area 1 covers a good portion of Clift's-Baird's Cove, except for the side of Atlantic Place. The speaker is concerned that the overhang is on the boundary of this Heritage Area and so having a 12-storey building with an overhang is not appropriate. It will change the character of the Cove, have a great impact on tenants, customers and others using the Cove, and result in some shadowing, wind and snow effects on the existing businesses.

The speaker did indicate that they are not against the proposed hotel, as they feel it and the kiosk on the corner will bring more activity to the Cove.

They posed an additional question later in the meeting, wondering how many hotel rooms were in the overhang. A. Novak responded that there are 6 hotel rooms in this structure.

Speaker #3: This speaker said that everybody knows Atlantic Place and the parking garage are “ugly”, but this is not a good reason to be adding mass and height. They said it is disrespectful of the older buildings and geography. Erecting this building is the beginning of eventually having a “wall” across the span of the harbour, blocking the Southside Hills. This speaker felt the look of the building was fine, but it is misplaced.

Speaker #4: This speaker wondered how this second meeting process was different from the first meeting (the public meeting) and what would happen after this second hearing.

Response from City staff and Your Commissioner: The engagement and public meeting and public hearing processes were explained, with it being highlighted that the public hearing is a process designated under the Urban and Rural Planning Act. The public hearing is undertaken by an independent commissioner who provides a report to Council, which they can accept or reject.

This speaker also expressed concerns about the proposed development's design, color and height. As there had been concerns expressed about these features at the public hearing, they wondered why there had been no action taken.

Response from City staff: When building outside of a designated Heritage Area, one has to conform to the existing regulations in terms of, for example, height and size, but the City has little control over design. There is a higher measure of control within the Heritage Areas. The staff highlighted that when Atlantic Place was constructed in the early 1970s, there was an area "carved out" within the Heritage Area for the building. It was a large and modern building, which did not have any heritage features. As such, and to this date, given it is not in a Heritage Area, it is treated the same as any building outside of these Areas and so there is no design control.

Speaker #5: This speaker felt that, while there are building codes in place, these are changed on an ongoing basis in response to what developers want. They wondered rhetorically why the city even has standards.

Their second concern was in relation to the parking relief being sought for the development. If the rooms are full and the patrons need to park, will this impact parking in the area? If parking is limited, this contributes to the ongoing general concern the public has about parking limitations in the Downtown.

Speaker #6: This speaker said that many of their concerns had been expressed. However, this speaker is involved with visual artists and wondered how this new space could benefit this population. Would there be an opportunity for affordable space for them? (A. Novak addressed this issue later in the meeting.)

Speaker #7: This speaker's first area of interest was in relation to planning for the existing garage structure. They felt that the structure had been poorly constructed initially and continues to experience significant corrosion. They wondered how the proponent would enclose the structure

with the mesh-type material and ensure it could be sustained by the existing infrastructure. They asked if there was a budget for this activity over the long-term.

Response from A. Novak: There is and has been a long-term annual budget for corrosion control. The screen is made from a high-end product and will be highly perforated to allow for ventilation. The original structure was designed to allow for additional storeys. There is surface corrosion, and this and other maintenance issues are known and being addressed on an ongoing basis.

Currently, the building is allowed to be 11 storeys, but the storeys are not equated with height. The fourth floor of the hotel will not exceed the height of Atlantic Place.

This speaker's main area of concern was in relation to air rights. They wondered why portions of the hotel have to protrude out over the sidewalk and why this aspect could not be eliminated. They felt strongly that air rights are not Councils to give away: they belong to the citizens and the city.

Response from A Novak: Sonco Group has spent significant time determining what the right plan would be for the parking garage and settled on the concept of the hotel. When looking for investors, they could not get any interest in a structure with fewer than 100 rooms. The 108 rooms provide the balance to ensure the hotel model works. If they pulled the overhang back and lost the associated rooms, the result would be a sheer wall. The advice from the architects is the cantilever acts as a framing for the view from the street. The shape of the building, the size and location, are less of an architectural choice and more a physical mandate, i.e., what is needed to house a building on top of a building? They consulted with the engineers who created the original design for the parking garage, as well as others, in developing the design.

In response to this speaker's question about what this development would do for the city, Mr. Novak said that he has been coming to St. John's for many years. They have a specific plan for the type of boutique hotel being proposed and are looking at this becoming something unique that the city can be proud of. He added that they have a long history of developing relationships with arts communities and have incorporated art into their buildings, as it is an important consideration for them.

Speaker #8: This speaker indicated they did not like the design and reiterated concerns about parking relief and how it will magnify an existing problem.

Response from City staff: The applicants were asked to provide a rationale for the parking relief, which they provided based on an analysis of demand in recent years. Based on this analysis, there is enough space to accommodate the required parking.

This same speaker was concerned about “scope creep”, stating that it was identified in the LUAR that the applicant could apply for a variance to allow for additional height, as per Section 8.6 of the St. John’s Development Regulations. They were concerned that, if the developer encounters monetary or other challenges, they might request this variance to go higher.

Speaker #9: This speaker also was concerned about increasing the height of the garage, given there was an amendment some years ago to allow a height of up to 11 storeys. They felt the amendment should specifically limit the proposed development to 11 storeys and not provide any opportunity for a future request for additional height.

They also stated that regardless of the proposal for the hotel, the cladding should be applied, and upgrades undertaken.

Finally, they expressed concern with the timing of the construction development in relation to the “Big Dig” in the Downtown area, and how this could impact traffic flow.

Speaker #10: This speaker stated that many others have spoken about the value of Downtown to visitors, which they described as a “hidden gem” and iconic in and of itself. They felt that the development under consideration is precedent setting: the building does not fit with the brand, image or sense of Downtown, and the concern is that it could lead to other changes also contrary to the area’s heritage and history.

This speaker said that there had been years of consultation for Envision, during which time the residents expressed the importance of Downtown heritage and culture. It is not clear whether the proposal is adhering to urban design guidelines, and the decision should be considered premature.

Speaker #11: This speaker lives in the area of the Ecclesiastical District and feels that the views from there are gradually being eroded. They stated that tourists come for these experiences, and that views of water increase people’s sense of wellbeing.

Speaker #12: This speaker said that this proposal for a hotel does not do much for the city. They stated that it would not increase tourism and takes revenue away from the local economy, because the owners are not from the city. They said a better use of the space would be affordable housing to increase residential living in the Downtown.

Speaker #13: This speaker reiterated earlier comments regarding traffic, impacts of the construction and the fact this is a private development for profit, with little return for the city.

Speaker #14: This speaker also raised concerns with the design, size and scale of the development. They questioned whether this type of development is needed during a weaker economy and said it would not contribute to revitalizing the Downtown. They added that this is not going to provide added value to the city, will not appeal to the broader population, and will not necessarily be available to all potential patrons in the local area.

5.0 CONSIDERATIONS

In reaching a conclusion on the merits of the proposed amendments, Your Commissioner considered the following information.

5.1 Consistency with the St. John's Municipal Plan

5.1.1 The City of St. John's Vision

As stated in Section II of the St. John's Municipal Plan, the Vision for the City is:

This Municipal Plan has been adopted to preserve and enhance the City of St. John's as one of the oldest continuous settlements in North America, as a home for its citizens, and as the economic engine of the Province of Newfoundland and Labrador.

This Vision will be achieved through reinforcement of the physical and social features of the city that define its character, notably the harbour, the Downtown, and the many distinct communities within its boundaries. It is the goal of this Plan to continue to nurture the City of St. John's as a leading community in Atlantic Canada, and as a home that provides its residents with diverse and high quality housing, employment opportunities, and the full range of supporting services.

5.1.2 Urban Form

As stated in Section III-1 "Urban Form" of the Municipal Plan:

The broadest objective of land use policies is to facilitate an efficient pattern of development. Generally, this means building a compact city. A compact city makes better use of its infrastructure and needs less roadways. With shorter distances to travel to work and shopping, car trips are reduced, and transit use is facilitated. Often, too, parks, schools, and facilities can be used more intensively, meaning the same investment will serve more people. A compact city, furthermore, reflects the traditional character of much

of St. John's, exemplified by such areas as the Downtown, Georgetown, and Churchill Park.

Encouraging development of a compact city is particularly challenging for the City of St. John's because of its geography and history. [...] The Downtown and adjoining areas developed prior to 1945 present their own challenges. Relatively narrow streets, dense development, and a street system that, due to topography and history, follows an irregular form, restrict traffic in many directions and allow for little public or private open space. City policies on parking and 'limited circulation' in the Downtown have sought to balance development of the Downtown with its traditional character.

The overall objective of the St. John's Municipal Plan in relation to Urban Form (III-1.1) is to:

Encourage compact urban form to reinforce the older areas of St. John's, to reduce the cost of municipal services, and to ensure orderly development in new areas.

As described in Section III-1.2 "General Policies" of the Municipal Plan:

Achieving a compact city requires commitment to orderly land use patterns. In addition to the commitment to increase density and mix land uses, the City must ensure the provision of appropriate supporting infrastructure. [...]

The following subsections in III-1.2 reinforce the City's focus on facilitating compact urban form:

1.2.1 Development in Serviced Areas

The City shall encourage new development and redevelopment in areas serviced with municipal water and sewer, extending existing networks in adjacent areas where capacity is sufficient but, especially, emphasizing opportunities within currently serviced areas where existing systems can accommodate increased density or infill.

1.2.2 Development Density

The City shall encourage increased density in all areas where appropriate.

5.1.3 Commercial Land Uses

Section III-3 of the St. John's Municipal Plan speaks to the role of the City in relation to commercial land uses:

[...] The commercial structure of St. John's is changing. New commercial developments arise, and older business areas must adjust. The role of the City is to ensure an adequate

level of commercial services throughout St. John's by facilitating appropriate development in new areas, maintaining the viability of older areas, and minimizing the impact of commercial development on residential neighbourhoods and municipal services.

The objective in relation to commercial land uses is found in Section III-3.1 "Objective":

To ensure an adequate supply of suitable land to accommodate a range of commercial activity throughout the City to meet the needs of residents and to offer opportunities for work and employment.

A number of general policies expand on this objective as per Section III-3.2:

3.2.1 Adequate Service Levels

The City shall provide ample scope for business expansion at appropriate locations throughout the city and assist in the reorganization and redevelopment of older business areas, particularly the Downtown.

3.2.2 Development Impacts

The City shall ensure adequate control of commercial developments to limit any detrimental effects that may result from such developments.

5.1.4 Designation of the Subject Property

The subject property at 1 Clift's-Baird's Cove is located within a site-specific A.P. Parking Garage District. As detailed in Section III-3.3.6 of the St. John's Municipal Plan, this District allows the following uses and associated height and bulk:

3.3.6 A.P. Parking Garage District

Permitted Zones

In this District, which applies only to the existing A.P. Parking Garage site located at Civic Number 1 Clift's-Baird's Cove, the City may allow a zone in which a parking garage for public use is the only permitted use. The City may also allow other uses it deems appropriate as discretionary uses.

Building Height and Bulk

In this District, the maximum building height is limited to 11 Storeys and the maximum Floor Area Ratio is limited to 2.2.5.

To accommodate the proposed development on this site, i.e., addition of a 4-storey hotel above the existing 8-storey parking garage for a total of 12 storeys and a height of 46.8 metres, amendments are required to this section (3.3.6) of the St. John's Municipal Plan. Specifically,

Section 3.3.6 A.P. Parking Garage District would be amended to remove the Building Height and Bulk subsection detailed above. These standards are usually established in the St. John's Development Regulations and are not required in the Municipal Plan.

Additionally, Map111-2 (Downtown Building Control Map) would be amended to allow a building height not exceeding 12 storeys/47m and a Floor Area Ratio (FAR) not exceeding 2.5.

5.1.5 Planning Areas

As described in Section IV of the St. John's Municipal Plan, the City is divided into a number of Planning Areas including Planning Area 1 - Downtown. As detailed in Section IV-2 "Downtown":

[...] Downtown St. John's is the heart of the City of St. John's and the St. John's Urban Region. The Downtown is home to the bulk of the City's heritage buildings. Its skyline and views of St. John's Harbour and the Battery define the image of St. John's to tourists.

From the end of World War II to well into the 1970s, Downtown St. John's was challenged by the suburbanization of housing and shopping facilities in the region. In the past 20 years, however, the Downtown has been re-established as the home to a range of activities, including residential neighbourhoods, shopping areas, cultural and entertainment facilities, and administrative and institutional uses. [...] It is also a key regional shopping centre providing specialized retail uses catering to general, tourist, and niche markets.

The objectives for the Downtown Planning Area are described in Section IV-2.1:

To ensure a comprehensive and balanced development of the Downtown that provides a dynamic focus for a wide variety of activities within a harmonious physical setting through pursuit of the following land objectives.

One of the land use objectives includes a focus on tourism:

2.1.5 Promote Religious, Public Assembly, Tourism and Recreation Uses

To optimize the location and operation of [these uses] through:

1. The development of an attractive urban environment that will emphasize the importance of the City's heritage and preserve the existing amenities and views of the harbour and Southside Hills from streets and open spaces;

[...]

3. The development of adequate convention, assembly, recreation and tourism facilities in the Downtown

Further, in terms of the major land use functions for the Downtown Planning Area, and as per Section IV-2.2 “Policies”:

Public Assembly, Recreation and Tourism

The most important area for experiencing the historic legacy of the Province;

An important concentration of amenity areas and religious, assembly, recreation and education facilities for residents and tourists alike;

Major site for high density tourist accommodations and convention facilities.

5.2 The St. John’s Development Regulations

5.2.1 Proposed Amendments

Under the St. John’s Development Regulations, the subject property at 1 Clift’s-Baird’s Cove is in a site-specific zone - the A.P. Parking Garage Zone (see Section 10.51). In this Zone, there is one permitted use – a parking garage, as noted in subsection 10.51.1. There are several Discretionary Uses:

10.51.2 Discretionary Uses

- (a) Hotel located on the 9th and/or higher Storeys of a Building
- (b) Dwelling Units located on the 9th and/or higher Storeys of a Building
- (c) Office/Reception uses accessory to or normally associated with a Hotel on any Storey (subject to a Hotel being developed on the 9th and/or higher Storeys of a Building).

In terms of the Zone requirements, and as set out in Section 10.51.3:

Zone Requirements

- (a) Building Height (maximum): 11 storeys
- (b) Publicly Available Rental Parking Spaces (minimum): 670:
 - i. Discretionary Uses that may be approved in the Zone are subject to the proviso that any such approved Discretionary Use shall be developed, undertaken, maintained, and used in such a manner that Publicly Available Rental Parking Spaces on the 1st through 8th Storeys of the Building shall not number less than 670;

ii. For the purpose of the A.P. Parking Garage Zone, Publicly Available Rental Parking Spaces shall mean parking spaces that are available to the general public for rental on an hourly, daily, or monthly basis. The foregoing shall not include any parking spaces that are otherwise required by the Regulations in relation to any other Discretionary Uses that may be approved in the Zone

(c) Floor Area Ratio (maximum) 2.25

To accommodate the proposed development on this site, i.e., addition of a 4-storey hotel above the existing 8-storey parking garage for a total of 12 storeys and a height of 46.8 metres, amendments are required to this Section (10.51) of the St. John's Development Regulations. Specifically:

- Section 10.51.2 would be amended to include additional Discretionary Uses of “(d) Office” and “(e) Retail Store”;
- Section 10.51.3(a) would be repealed and replaced with “Building Height (maximum): 12 storeys (not exceeding 47 metres)”;
- Section 10.51.3(c) would be repealed and replaced with “Floor Area Ratio (maximum) of 2.5”.

Further, amendments would be made to Map F (Downtown Building Control Map) by substituting the property at 1 Clift's-Baird's Cove (Parcel ID #34257 & 139734) as follows: “Areas allowing building height not exceeding 12-storeys/47 metres and a Floor Area Ratio not exceeding 2.5”.

Discretionary Use

As per Section 2 “Definitions” of the St. John's Development Regulations, a Discretionary Use is defined as follows:

Discretionary Use, as described in Section 5.8 of these Regulations, means a Use which may be permitted by Council to be established subject to special conditions or controls.

Section 5.8 of the St. John's Development Regulations sets out that:

Discretionary Uses may only be considered for approval where they are set out as Discretionary Uses in Section 10, subject to the requirements of these Regulations [...].

5.2.2 Zoning Considerations

5.2.2.1 Traffic

There were no traffic concerns identified by City staff in relation to the proposed development at 1 Clift's-Baird's Cove.

5.2.2.2 Parking

Off-street parking requirements are detailed in Section 9 of the St. John's Development Regulations. Subsection 9.1.2 outlines "Special Parking Requirements", including those for the Downtown – 9.1.2(2) Downtown Parking Standard – Non-Residential/Residential. Also detailed under Section 9.1.2 are requirements for parking relief:

9.1.2(1) Parking Relief

Council may relieve an applicant of all or part of the parking requirements set out under Section 9.1.1 and 9.1.2, provided that the applicant is able to show that because of the particular characteristics of the Development that the actual parking requirements within the foreseeable future are expected to be lower than those required by the City standard.

As detailed herein, in 2013, there was an agreement signed between the City of St. John's and Sonco Group Inc., stating that there would be no fewer than 670 public parking places in the A.P. Parking Garage. At the time of the initial application for 1 Clift's-Baird's Cove, any change to this number would have necessitated an amendment to the agreement; however, over the time of the application being processed and discussed, Council has enacted consideration of parking relief as noted above.

The table provides the current and proposed parking availability in the A.P. Parking Garage in relation to the application under consideration from Sonco Group Inc., thereby explaining the need for parking relief of 21 spaces.

Total number of parking spaces <i>currently available</i> in the A.P. Parking Garage	720
Total number of parking spaces <i>available following renovations</i> for the proposed development (-17)	703
Total number of parking spaces <i>required</i> for the proposed development	54
Total number of parking spaces <i>available to the public should the development proceed (703-54)</i>	649
<i>Shortfall</i> of public parking spaces from the 670 required	21

Appendix "A" of the LUAR provides a detailed overview of the monthly average of the number of unused and available parking spaces in the A.P. Parking Garage both mid-morning and early afternoon from 2015 - 2018. In 2015, there was an average low of 91 spaces available/unused in February to an average high of 268 spaces available/unused in December. In 2018, there were 339+ parking spaces available/unused each month, with the highest average availability being in December (402). This increase in unused/available parking spaces was noted to primarily reflect the loss of corporate spaces due to companies moving elsewhere in or out of the Downtown.

Concurrent with this decrease in demand for corporate parking in the A.P. Parking Garage, and since 2013, the City has cost-shared 461 additional parking spaces between the 351 Water Street Parking Garage and the Duckworth Street Parkade.

5.2.2.3 Height and Variances

The St. John's Development Regulations were amended in 2014 to allow a maximum building height of 11 storeys for the A.P. Parking Garage, stipulating that the structure could not be higher than Atlantic Place, which also is in a site-specific zone – Commercial Atlantic Place (CAP) Zone. This requirement was in reference to number of levels and not specifically denoted in relation to a measure of height.

As detailed previously, the current height requirement for the A.P. Parking Garage as per Section 10.51.3(a) is a maximum of 11 storeys. The amendment in question proposes a height of 12 storeys but also a maximum height requirement – not exceeding 47 metres. While the A.P. Parking Garage will be one storey higher, it will not exceed the height (in metres) of the adjoining Atlantic Place.

The applicants could apply for a variance to allow possible additional height as per Section 8.4 “Minor Variances” of the St. John's Development Regulations:

(1) Where an approval or permit cannot be given because a proposed development does not comply with development standards set out in these Regulations, the City may, in its discretion, grant a Variance if, in the City's opinion, compliance with the development standards would prejudice the proper development of the land, building or structure in question or would be contrary to public interest.

A Variance from the development standards set out in these Regulations shall not be allowed, if that Variance, when considered together with other Variances made or to be made with respect to the same land, building or structure, would have a cumulative effect that is greater than a 10% Variance, even though the individual Variances are separately no more than 10%.

However, as highlighted in Section 8.4(6) and as specifically referenced in Council correspondence:

Applications for all Variances other than those detailed in Section 8.4(4) and 8.4(5) shall be referred to Council for consideration.

It is important to note that the commercial zones surrounding 1 Clift's-Baird's Cove are within the Commercial - Downtown District, which speaks to height allowances. As per Section 3.3.4

“Commercial - Downtown” of the St. John’s Municipal Plan:

Building Height and Area

This District allows buildings not exceeding 15 metres in height with a Floor Area Ratio not exceeding 3.0, except where otherwise provided in the Development Regulations. In a situation where owing to substantial grade differences on a lot with frontage on more than one public street, a multi-storey building would have a storey higher than 6.0 metres, Council may increase the maximum Floor Area Ratio to 4.0, provided the maximum Building Height in metres is maintained. [...]

Additional bulk and height may be permitted as a bonus in specific areas outlined on Map III-2 to a maximum of twelve storeys with a Floor Area Ratio of 6.0. To qualify for such bonus, the proposed development shall meet the following requirements:

1. the lot depth for the proposed building shall not be less than 40 m;
2. building heights in excess of four storeys shall be controlled by means of light angles (see Map III-2), designed to reduce the physical impact of high buildings on adjoining streets and public open spaces, allowing for adequate sunlight, minimizing building-generated wind velocities, and preserving harbour views from streets and public open spaces.

Building Height in Heritage Areas

The additional height bonus as provided in the preceding Section is restricted to a maximum of ten storeys, where the building is located in a Heritage Area (see Part III, Section 7).

A review of Map III-2 shows that the areas of greater bulk are limited and, with a few exceptions, are buildings that have existed for quite some time. Additionally, there will be policies in the new Envision Municipal Plan which will further limit height east of Adelaide Street to 4 storeys to a maximum of 6 storeys.

5.2.2.4 Views

As previously explained, the proposed addition is located at the far east side of the property, resulting in a large setback from the buildings along Water Street. While the hotel volume also is set back from Harbour Drive, it extends beyond the northern property line and slightly at the southern property line. The proposal calls for three signs which also extend beyond the property lines. The encroachments arising from both the building and the signage will result in a need for Air Rights Agreements. The encroachment along Clift’s-Baird’s Cove will extend past the subject property line and over the sidewalk to a maximum of 8.4 metres at its farthest point.

The issue of views is one to consider in relation to the encroachments over Clift's-Baird's Cove and the proposed increase in height. From the Court House steps, there is a view of the harbour; however, the view of the Southside Hills is already impeded by the existing parking garage. The addition of 4 storeys on the A.P. Parking Garage and the encroachment will further impact this view of the Southside Hills from that particular vantage point, but it does not significantly impede the view of the harbour.

There was a concern that allowing the amendments to accommodate 12 storeys at 1 Clift's-Baird's Cove would detract from the views *from* the harbour. Again, this view is already limited by the existing structure. While the addition of 4 storeys and the overhang might impede views up Clift's-Baird's Cove from some angles from the harbour, it is important to state that the buildings to the east of the A.P. Parking Garage are significantly lower offering clear uphill views of the Court House, Ecclesiastical District and other historic sites.

5.2.2.5 Discretionary Uses

Two additional discretionary uses are being proposed for the A.P. Parking Garage Zone – office and retail. In the area immediately surrounding the A.P. Parking Garage, the predominant zone is Commercial Central Retail (CCR). As set out in Section 10.25 of the St. John's Development Regulations, this Zone allows an array of commercial uses. The discretionary uses proposed to be added to the A.P. Parking Garage Zone are in keeping with the surrounding commercial uses.

5.2.2.6 Aesthetics

As described herein, the A.P. Parking Garage is in a site-specific zone. As stated previously, when Atlantic Place and the parking garage were built, there was a "space" created within the Heritage Area for the structures. As such, these modern buildings are not subject to the design standards of the Heritage Areas and instead are treated the same as any other building outside of these Areas.

However, Council did refer the application to the Built Heritage Experts Panel, as previously referenced, and could consider their comments. They suggested that the use of yellow should be muted to not detract from the heritage buildings on Water Street. They agreed that any mural/sculpture design on the south side should be meaningful and not appear as a billboard for advertisements or be illuminated, and any proposed art installation should be determined prior to development approval.

Further, as discussed in the August 28, 2018 correspondence to Council, the design for the development is conceptual and will be finalized at the development stage. And, as recommended in the January 15, 2020 correspondence from staff to Council:

- The applicant consider using an alternative colour palette as displayed on page 13 of the LUAR.
- The design of the Harbour Drive façade be determined prior to the development approval.

6.0 CONCLUSION

In reaching a conclusion on the merits of the proposed Amendments, Your Commissioner considered the following:

6.1 Consistency with the St. John's Municipal Plan

Overall vision and approach

As detailed in Section II “Vision” of the St. John's Municipal Plan, “St. John's offers planners a special challenge to sustain its legacy while developing its potential”. The goal of the Plan includes nurturing the City of St. John's as a leading community in Atlantic Canada, and as a home that provides its residents with employment opportunities and access to supporting services.

The vision for the city as provided in the St. John's Municipal Plan includes a focus on preserving the past while enabling future development which is of benefit to all of its residents – in particular in relation to housing, employment and supporting services.

A critical focus of the St. John's Municipal Plan is to encourage compact urban form to reinforce the older areas of St. John's, to reduce the cost of municipal services, and to ensure orderly development in new areas. This would include encouraging increased density in all areas where appropriate.

Commercial Land Uses

The City has a role in ensuring appropriate and adequate commercial land use by facilitating appropriate development in new areas, maintaining the viability of older areas, and minimizing the impact of commercial development on residential neighbourhoods and municipal services. The proposed amendments to the Municipal Plan provide for increased commercial use in the Downtown.

Planning Area 1 – Downtown

The objective for Planning Area 1 - Downtown as detailed previously is “to ensure a comprehensive and balanced development of the Downtown that provides a dynamic focus for a wide variety of activities within a harmonious physical setting [...]”

One of the land use objectives includes a focus on tourism including development of adequate tourism facilities in the Downtown. This Planning Area is also considered a “major site for high density tourist accommodations.”

It is clear that the proposed development is consistent with the intent and direction of the St. John’s Municipal Plan – facilitating infill/density/a compact urban form and ensuring balanced development.

6.1.1 Mitigation of Impacts in Relation to the Amendments

The Municipal Plan identifies a role for the City in ensuring that impacts associated with particular zones are compatible with policies adopted under the Plan. The primary issues of concern raised by those who attended the public meeting and/or public hearing, as well as those who provided written submissions for one or both of these public processes were fairly consistent and, in summary, primarily related to:

Traffic

Traffic is not considered an issue for this proposed development.

Parking

A few of the submissions and presentations opposing the proposed development cited concerns with parking. As previously explained, the applicant is seeking parking relief of 21 spaces. The evidence presented in the LUAR identifies that relief of these spaces will not in any way impact the availability of spaces to meet public demand and would easily accommodate any parking demand related to the hotel. As well, in the last number of years, the City has cost-shared an additional 461 parking spaces in the Downtown. Further, one would assume that the demand for hotel parking and the demand for public parking would be at different times of the day/night and week, as discussed previously.

Height

The proposed amendments to the St. John’s Development Regulations to enable 12 storeys for the A.P. Parking Garage meet the intent of the amendments made in 2014 to restrict its height, so it would not be any higher than the adjoining Atlantic Place. While it will be 12 storeys, the building height is restricted to that not exceeding 47 metres.

While a variance is possible in relation to this proposal, given that the proposed amendments do not change the intent of those delineated in 2014, Your Commissioner feels confident that Council wishes to maintain the original vision of the garage not being higher than the adjoining Atlantic Place.

Some of the opposition to the proposed height increase was in relation to the precedent this would set for the surrounding Downtown areas. As stated previously, the surrounding commercial zones are in the Commercial - Downtown District, which provides clear stipulations on height. The areas of greater bulk are limited and, with a few exceptions, are buildings that have existed for quite some time.

Views

The main issues raised with the encroachment on Clift's-Baird's Cove and the increased height of the parking garage were in relation to the impacts on views. As discussed previously, the existing parking garage structure impacts views of Southside Hills from the Court House steps and views up from the harbour. The addition of the 4 storeys on top of the A.P. Parking Garage's existing 8 stories will further reduce the view of Southside Hills but will not significantly impact the view of the harbour. In terms of impacting the views uphill from the harbour, there are many and varied vantage points from the harbour which afford this view. The view of and from the Cove will not be appreciably impacted by the encroachment.

Aesthetics

While there is some concern about the aesthetics of the building including the colour and the cladding, these issues can be addressed if the development proceeds. Council has sought input from the Built Heritage Experts Panel which can support final decisions in this regard.

7.0 RECOMMENDATIONS

Based on the foregoing considerations, Your Commissioner recommends the following:

Acceptance of the St. John's Municipal Plan *Amendment Number 147, 2020*

1. Amend Section 3.3.6 A.P. Parking Garage District by removing the following Building Height and Bulk subsection:

“Building Height and Bulk - In this District, the maximum building height is limited to 11 Storeys and the maximum Floor Area Ratio is limited to 2.25”.

2. Amend Map III-2 (Downtown Building Control Map) by substituting the property at 1 Clift's-Baird's Cove (Parcel ID #34257 & 139734) as follows:

“Areas allowing a building height not exceeding 12 storeys/47 m and a floor area ratio not exceeding 2.5.”

Acceptance of the St. John's Development Regulations (*Amendment Number 680, 2020*)

1. Amend Section 10.51.2 Discretionary Uses by adding the following:

“(d) Office
(e) Retail Store”

2. Repeal Section 10.51.3(a) and substitute the following:

“Building Height (maximum): 12 storeys (not exceeding 47 metres)”

3. Repeal Section 10.51.3(c) and substitute the following:

“Floor Area Ratio (maximum): 2.5”

4. Amend Map F (Downtown Building Control Map) by substituting the property at 1 Clift’s-Baird’s Cove (Parcel ID #34257 & 139734) as follows:

“Areas allowing building height not exceeding 12-storeys/47 m and a floor area ratio not exceeding 2.5”

RESPECTFULLY SUBMITTED THIS 17TH DAY OF APRIL 2020



Marie. E Ryan,
Commissioner

APPENDIX “A” – TERMS OF REFERENCE FOR THE LAND USE ASSESSMENT REPORT

TERMS OF REFERENCE
LAND USE ASSESSMENT REPORT (LUAR)
APPLICATION TO INCREASE HEIGHT TO 12 STOREYS AT
1 CLIFT’S-BAIRD’S COVE, ATLANTIC PLACE PARKING GARAGE DISTRICT AND ZONE

The proponent shall identify significant impacts and, where appropriate, also identify measures to mitigate impacts on land uses adjoining the subject property. All information is to be submitted under one report in a form that can be reproduced for public information and review. The numbering and ordering scheme used in the report shall correspond with that used in this Terms of Reference and a copy of the Terms of Reference shall be included as part of the report (include an electronic PDF version with a maximum file size of 15MB). A list of those persons/agencies who prepared the Land Use Assessment Report shall be provided as part of the report. The following items shall be addressed by the proponent at its expense:

A. Building Use

- Identify the size of the proposed building (expansion) and existing building by:
 - Gross Floor Area, and
 - Floor Area Ratio (FAR).
- Identify all proposed uses/occupancies within the building by their respective floor area.

B. Elevation & Building Materials

- Provide elevations of the proposed building.
- Identify the finish and colour of exterior building materials.

C. Building Height & Location

- Identify graphically the exact location with a site plan:
 - Location of the proposed expansion and existing building;
 - Proximity of the building to property lines and identify setbacks;
 - Identify any encroachment over property lines;
 - Identify the height of the building;
 - Information on the proposed construction of patios/balconies (if applicable);
 - Potential shadowing/loss of sunlight on adjacent public and private properties, including sidewalks; and
 - Identify any rooftop structures.
- Provide view planes of the proposed building from the following locations:
 - Water Street, near the bottom of the Courthouse steps (193 Water Street);
 - Duckworth Street, near the top of the Courthouse steps (309 Duckworth Street);
 - The intersection of Water Street and McBride’s Hill;
 - Clift’s-Baird’s Cove;
 - Harbour Drive along the port side, at the rear of 179 Water Street;
 - The Rooms, 9 Bonaventure Avenue; and
 - The St. John’s Harbour.

D. Exterior Equipment and Lighting

- Identify the location and type of exterior lighting to be utilized. Identify possible impacts on adjoining properties and measures to be instituted to minimize these impacts.
- Identify the location and type of any exterior HVAC equipment to be used to service the proposed building and identify possible impacts on adjoining properties and measures to be instituted to minimize these impacts.

E. Landscaping & Buffering

- Identify any landscaping for the proposed development, both hard and soft.
- Identify the location and proposed methods of screening of any electrical transformers and refuse containers to be used at the site.
- Identify any additional street-level elements, such as weather protection measures at entrances, street furniture, etc.

F. Building Wind Generation

- Identify if the increased height of the building will alter the wind conditions on adjacent streets, sidewalks and entrances to the building, and identify measures to minimize impacts at the pedestrian level.

G. Snowclearing/Snow Storage

- Provide information on any snow clearing/snow removal operations.

H. Off-street Parking and Site Access

- Identify the number and location of off-street parking spaces to be provided.
- Identify any parking areas, including vehicular ingress and egress and on-site traffic circulation.
- Identify existing parking demand profile through a typical day. Identify profile of expected additional parking demand.

I. Municipal Water and Sewer Services

- Identify points of connection to City water, sanitary and storm sewer mains.

J. Traffic

- Provide the anticipated traffic generation rates associated with the proposed development.

K. Public Transit

- Consult with St. John's Metrobus (St. John's Transportation Commission) regarding public transit infrastructure requirements.

L. Construction Timeframe

- Indicate any phasing of the project and approximate timelines for beginning and completion of each phase or overall project.
- Indicate on a site plan any designated areas for equipment and materials during the construction period.

APPENDIX “B” – WRITTEN SUBMISSIONS (Presented as a separate document)