

November 21, 2023

Megan Backos
Planner III
HRM Planning and Development
By: email

RE: Case MPSA-2023-00349 - Reply to HRM Team Review #1 - Aug 31, 2023

Megan,

On behalf of Clayton Developments and Shannex we appreciate your efforts to date on the Bedford South Shannex site. Please find attached replies to the comments received as a result of Team Review #1.

Rationale for reduction in dwelling unit population

We want to confirm our projected density allocations based on actual experience. We believe the allocation of density using the new HRM Share Housing planning regulations is appropriate and recognizes the important and unique demographic characteristics and avoids an ageism perspective that previous planning principles created.

Shared Housing (Lifestyle/All Inclusive/Assisted/Nursing) 1 person/unit concept. These seniors' accommodation vary from suite style units to bed setting rooms and have direct access to amenities and services. Regardless of the suite amenities the occupancy is single occupancy 92% of the time on average. Some residents refuse to move to studio suites, or even one bedroom suites and they want more space to accommodate their personal belongings as they are coming from a house and do not want to leave that part of their life behind. Most use the spaces other than their bedrooms are used for library, guest rooms, offices. These buildings are supported by Shannex staff 24/7 for the special needs of seniors, as well as safety and enjoyment.

Shannex reviewed double occupancy data for our local communities where a full continuum of services are offered. A full continuum means there are Lifestyle Apartments, All Inclusive Suites, Supportive Living Suites (comprised of assisted living and memory care) and Enriched Care / Enhanced Care suites (nursing home level care).

The communities are Parkland at the Lakes (PAL) in Dartmouth; and Faubourg du Mascaret (FDM) in Moncton. These communities have the same service lines we are proposing for our Bedford Square development and are reflective of anticipated occupancies.

On average the double occupancy rate over these communities is 8%. This is largely based on the demographics of our residents, largely being widowed or single women in their late 80's. The breakdown by campus is as follows:

Campus	Double Occ %
FDM (Moncton)	8.9%
PAL (Dartmouth)	7.0%
Total	8%

Original Townhouse Concept: The original concept from 2009 included a traditional style at grade townhouse. In the most recent concept, this has been replaced with 6 story “flats style” rental accommodation which is enabled under the existing development agreement. The original 2-person allocation per unit has been replaced with a more realistic and conservative number of 1.5 people/unit. The Lifestyle Flats accommodation will be seniors friendly age in place design, residential suite style accommodation with nurse call and a-la-cart services related to activities of daily living as well as access to the lifestyle services. These units are designed to be more independent and are most likely to house couples rather than widowers or singles.

Based on the above analysis we are proposing the following revised table for the allocation of population by unit type:

Parkland Bedford South	
Unit Type	Population Allocation (per Unit)
Townhouse/Stacked Townhouse	
Lifestyle Flats	1.5
Shared Housing	1.0
Lifestyle Apartments	1.0
All Inclusive Lifestyle	1.0
Assisted Living	1.0
Nursing Home	1.0

The creation of more senior specific units within the community can have a major positive impact of housing availability. Each senior specific unit that is created in this community will typically free up existing housing stock for between an average of 2.25 to 3.35 persons per unit depending on the housing type the senior currently lives in. This is based on the fact that many seniors live alone in their existing units, where these units when occupied by other residents may house much larger families.

Architectural Controls

We are suggesting limited architectural controls which will regulate building height, proximity to property lines, floorplate and lot coverage. We suggest limiting the new architectural controls to locations where proposed buildings cannot meet the existing requirements of the development agreement. Please see Attachment A which includes the proposed architectural controls and Attachment B which identifies the location for the new architectural controls. We look forward to additional discussion on this matter.

Landscaping Requirements - We concur with the concept of including landscaping requirements in the draft development agreement as the current agreement has the requirement for a landscape plan. We would suggest there be limited controls due to site design requirements. In practice, Shannex landscaping would generally exceed any requirement or minimum standard set by the Municipality as they typically landscape to a high standard. We look forward to additional discussion on this matter.

Updated Concept Plan – In response to evolving design plans and recent permitting and construction activities under the existing development agreement, an updated concept plan is attached. This plan is similar to that shown at the public information meeting on October 19th, and submitted to HRM a few days later with the exception that the driveway near Freisian Court has been relocated to align with Freisian Court and driveways on Larry Uteck Boulevard reflect recent discussions with HRM Engineering.

Further the concept is an evolution from the IBI plan which was previously submitted. Building placement has been updated to reflect recent building permits issued and the next phase of permits to be applied for. These areas provide certainty in site design as the proposal is enabled under the existing agreement. Areas outside are conceptual in nature and may be subject to change, Attachment C identifies the conceptual area which is subject to the proposed architectural controls mentioned above.

Proposed Conceptual Subdivision:

Proposed conceptual subdivision lines are shown on Attachment D. These lines demonstrate limited planned subdivision and that Shannex intends to have multiple buildings per lot.

Updated Phasing/ Amenity Space:

Attachment E outlines the proposed phasing of buildings on the site and demonstrates proposed amenity space. Further discussions will need to be had to determine the need to regulate the phasing of the buildings on the site as the site does not contain any municipal infrastructure or roads. From the amenity space numbers we should be able to create a minimum standard to cover the provision of amenity space within the development agreement. Similar to landscaping requirements, the amount of amenity space provided by Shannex would likely exceed any minimum standard set by the Municipality.

Proximity of Buildings near Fleetview Drive – The proposed buildings in this area have been designed under the terms of the existing development agreement and fully meet those terms. In many ways the requirements for these buildings likely exceed standards (specifically minimum yard requirements) that we have seen negotiated in

more other suburban areas such as Sub area 1 and 12 of Bedford West. The existing yard requirement of half the height of the building is still appropriate as the yard size increases with the building height.

Updated Traffic Impact Statement – The traffic impact statement (Attachment F) has been updated to respond to comment received. The study identifies the proposed Shannex Parkland site, based on the latest development plans, is not expected to have any significant impact to levels of performance on adjacent streets and intersections or to the regional street system.

Additional Transportation Adjustments –

Driveway Alignment - Friesian Court – At the public information meeting, it was identified that the driveway near Friesian Court should probably align with Friesian Court. The alignment of the driveway has been updated to the suggested location.

Driveway Updates – Larry Uteck Boulevard – There have been recent discussions between Shannex and HRM regarding driveways on Larry Uteck Boulevard. The concept plan has been revised to reflect these discussions.

Additional / Advisory Comments – All of the noted comments are acknowledged and have been forwarded to Shannex for consideration.

Density Bonus: We request that you provide a detailed explanation of density bonus charges and how you intend to implement them on the incremental density on the Shannex site that we can forward to Shannex for their information.

Once you have reviewed these comments, I suggest we meet to discuss any questions you may have or deal with any immediate items or concerns. Otherwise we eagerly await the results of your review.

We appreciate your attention to this matter.

Regards,



Andrew Bone
Director of Planning and Development
Clayton Development Limited

- Attachment A – Proposed Architectural Controls
- Attachment B – Location of Architectural Controls
- Attachment C - Updated Concept Plan
- Attachment D - Conceptual Subdivision Plan
- Attachment E – Building Phasing and Amenity Space
- Attachment F – Traffic Impact Study

CC: Darrel Dixon, Design Build Solutions
 Jason Shannon, Shannex
 Heather Hanson, Shannex
 Kevin Neatt, Clayton Developments

Attachment A – Proposed Architectural Controls

Low Rise – 11m – 36'

Mid Rise – 20m – 65'-7"

Tall Mid Rise – 26m – 83'-3:

High Rise – Above 26m - 85'-3 5/8"

Built Form and Siting Requirements within the New Requirement Area

Applicability

DA-1 (1) Subject to Subsection DA-1(2), any main building erected, constructed, reconstructed, altered, or located, or an addition to any main building, within the New Requirement Area as shown on Schedule X shall meet the built form and siting requirements of this Schedule.

Maximum Building Height

DA 2 Maximum building height shall not exceed 10 habitable storeys above grade facing the street.

Minimum Front or Flanking Setbacks

DA-3 Any portion of a main building, either above or below grade, shall have a minimum required front or flanking setback of 1.5 metres.

Side and Rear Setback Requirements

DA-4 (1) Subject to Subsections DA-4(2) and DA-4(3), the minimum required side and rear setback for any main building shall be:

- (i) 10.0 metres from any side or rear lot line external to the Lifestyle community site as shown on Schedule X;
- (ii) For a tall mid-rise building & high rise, a minimum required setback of 12.5 metres from any side or rear lot line external

- to the Lifestyle Community as shown on Schedule X shall apply above 14.0 metres in height;
 - (ii) 0.0 metres from the side or rear lot line which is internal to the Lifestyle Community site as shown on Schedule X.
 - (2) Underground parking structures are not required to have a minimum side or rear setback, providing they do not protrude more than 0.6 metre above the average finished grade in the applicable side yard.
 - (3) There is no maximum side setback.

Maximum Lot Coverage

DA-5 (1) The maximum permitted lot coverage shall be 50%.

Minimum Separation Distances

DA-6 (1) Excluding pedways, tunnels and at grade building link connections, where more than one main building is permitted on a lot, a minimum required separation distance shall be provided between main buildings, as follows:

- (a) 4.0 metres between low-rise buildings; or
- (b) 10.0 metres elsewhere.

(2) Where more than one portion of a main building protrudes above grade, a minimum

required separation distance shall be provided between the above grade portions, as follows:

- (a) 4.0 metres between low-rise portions; or
- (b) 10.0 metres elsewhere.

(3) Above the height of 14.0 metres, any portions of the same main building shall be

separated by a minimum required distance of:

- (a) 6.0 metres between a mid-rise typology and another mid-rise typology;
- (b) 12.5 metres between a mid-rise typology and a tall mid-rise typology; or
- (c) 12.5 metres between a tall mid-rise typology and another tall mid-rise

typology.
(d) 12.5 metres between high rise typology and another high rise typology.

Maximum Building Dimensions

- DA-7 (1) Excluding any structure below 0.6 metre above the average finished grade, a low-rise typology of a main building shall not exceed the following maximum permitted building dimensions of:
- (a) a building width of 120.0 metres; and
 - (b) a building depth of 120.0 metres.
- (2) A mid-rise typology of a main building shall not exceed the following maximum permitted building dimensions of:
- (a) a building width of 90.0 metres; and
 - (b) a building depth of 90.0 metres.
- (3) A tall mid-rise typology of a main building shall not exceed the following maximum permitted building dimensions of:
- (a) a building width of 64.0 metres;
 - (b) a building depth of 64.0 metres; and
 - (c) a floor area of 2,100.0 square metres per storey.
- (4) For the purpose of measuring building dimensions in subsections DA-7(1), DA-7(2), DA-7(3), and DA-7(4), where applicable, main buildings connected by a “building link connection” shall be measured separately, excluding the “building connection link”

Provide Definitions. Low Mid Rise, Mid Rise, Tall-Mid Rise, High Rise, Building Connection Link/ Building Link.