

February 10th, 2026

File No.: 2025-42

Ms. Andrea Fisher - Director of Legislative Services/Clerk
Town of Goderich
57 West Street
Goderich, Ontario N7A 2K5

- and -

Ms. Hanna Holman
Planner, Planning & Development Department
County of Huron
1 Courthouse Square
Goderich, Ontario N7A 1M2

**RE: Consent Application (Lot Addition) and Minor Variance Application
151 Bruce Street East and 175 Bruce Street East, Goderich, Huron County
One Day Holdings Corporation**

On behalf of One Day Holdings Corporation ("Owners"), we are pleased to submit a Town of Goderich Consent Application (Lot Addition) and a Minor Variance Application ("Applications") to facilitate the redevelopment of land known municipally as 151 Bruce Street East and 175 Bruce Street East, Goderich, Huron County.

The land subject to the Applications is legally described as Lot 792, Registered Plan 468, Town of Goderich, County of Huron.

The subject land is located on the north side of Bruce Street, between Cambria Road North and Albert Street North. There is an existing municipal sidewalk along the municipal frontage. There is an existing apartment building at 151 Bruce Street East, with a total of 19 dwelling units. The dwelling units generally range in size between 500 and 650 square feet and are considered affordable units¹. Based on aerial photography, the apartment building was constructed before 1978 and has had various parking configurations and availability. Off-street parking has generally been on gravel surfaces and not defined by painted lines. In this regard, it is unclear how many formal parking spaces are available for the tenants. The land associated with 175 Bruce Street contains an existing single detached dwelling with a driveway to Bruce Street.

The Site is designated as "Residential" in the Town of Goderich Official Plan and zoned as "Residential Medium Density (R2)" and "Residential High Density (R3)" in the Town of Goderich Zoning By-law.

The Owner proposes to sever 1,392.9 square metres of land from 151 Bruce Street East and add the land to 175 Bruce Street East by way of a lot addition. No new lots are proposed through the Consent Application.

¹ Town of Goderich Official Plan (Section B, Definitions)

For the purposes of this submission, 175 Bruce Street East is referred to as the “lot to be enlarged”. The Consent Application has the effect of creating the following:

- 1 Retained Parcel, with a land area of 1,364.7 square metres, and includes the existing 19-unit apartment building and 15 off-street parking spaces; and,
- 2 Lot to be Enlarged, with a land area of 1,938.3 square metres, is intended to include a new multi-unit building.

The Severed Parcel and Retained Parcel will function as separate developments, with individual vehicular access to Bruce Street East and separate municipal servicing.

To facilitate the Consent Application, a Minor Variance Application is required for the Retained Parcel. The purpose of the Minor Variance is to permit a reduction in the required off-street parking from 1 parking space per dwelling unit to 0.73 parking spaces per dwelling unit (14 off-street parking spaces). The existing dwelling units are small in scale and have a rental average of approximately \$1,000, with rents starting at \$600 per month.

It is noted that the Retained Parcel is considered legal non-conforming for the existing western side yard setback and the rear yard setback. In our opinion, a Minor Variance is not required for these setbacks as they are existing conditions. Based on aerial photography, the Retained Parcel has had fewer than 14 off-street parking spaces for the 19 dwelling units since the time of construction; however, parking was added and removed in the intervening years to 2025.

Planning Policy Framework

The following section provides an overview of the land use planning policies applicable to the Applications.

Provincial Planning Statement

The Provincial Planning Statement (“PPS”), 2024, is a province-wide policy document that sets the foundation for regulating development and land use. The PPS is issued under Section 3 of the Planning Act. The PPS “sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians.” The document is to be read in its entirety, and all relevant policies must be considered. Municipal official plans are the most important vehicle for implementing the PPS and achieving comprehensive, integrated, and long-term planning.

The PPS, in Section 2.1.6 a) states that planning authorities should support the achievement of complete communities by accommodating an appropriate range and mix of land uses and housing options. Section 2.3.3 of the PPS supports general intensification and redevelopment, including planning for a range and mix of housing options.

Section 2.2 of the PPS speaks explicitly to considerations for housing, including intensification, redevelopment and the provision of an appropriate range and mix of housing types and densities. Section 1.4.3 states that planning authorities shall provide for a mix of housing types and densities by, amongst others:

- b) 2. Permitting...all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

Planning Analysis

It is our professional opinion that the Applications are consistent with the PPS, maintain the existing affordable housing units, and will complement the area with the new proposed housing units. In combination, the development plans will contribute to the range of unit types and sizes in the community. Full municipal services and supporting municipal infrastructure are available.

Huron County Official Plan, 2021

The purpose and implementation of the Huron County Official Plan, 2021 ("County OP"), is outlined in Section 1.2, stating that:

The County Official Plan is a statement of the community and is presented in the words of the community. It is a record and guide. Not only does it provide direction for the activities of individuals and community organizations, the County Official Plan provides guidance to local municipalities for the development of local official plans. The policies and actions are general policies and are provided as guidance.

The County OP includes five (5) resource maps, provided as reference, not land use designations. Detailed mapping and land use designations are to be provided in the local official plans. The Site is identified as "Primary Settlement Area" on the Settlement Areas Map. Primary Settlement Areas are the largest urban centres in the County and have full municipal services. As stated in Section 7.3 of the County OP, these areas are intended to be the primary location for growth and development in the County with the full range of services, amenities and employment opportunities. The County OP states that 65% of growth will be allocated to the Primary and Secondary Settlement Areas.

Section 7.2.2 Housing and Intensification states that:

1) Market pressures and changing demographics are altering the form of housing types and the density of residential development. To accommodate these changes, and to address issues related to accessibility, mental health, housing attainability and low income, communities will:

- a) Encourage mixed use development.
- b) Contain an increase in overall density.
- c) Provide adaptable forms of housing.
- d) Promote infill development at a higher density than the surrounding neighbourhood.
- e) Require new development in fully serviced greenfield areas to be at a higher density than the existing residential neighbourhoods of the settlement area,
 - For example, including higher density uses, designing buildings for additional dwelling units, or establishing reduced lot area, frontage, and setback requirements than those in established neighbourhoods;
- f) Promote all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including additional needs housing.

Section 2.2.2.8 states that a range of housing options shall be permitted, as detailed in local official plans, and includes multiplexes.

Planning Analysis

It is our opinion that the Applications are in keeping with the directives of the County OP by providing an intensification opportunity within the built-up area with a greater range of housing types and affordability. The Consent Application facilitates the opportunity for infilling, by providing a larger land area to accommodate required setbacks, landscaping and off-street parking.

Town of Goderich Official Plan, 2009

The Town of Goderich Official Plan ("OP"), adopted in 2009 and consolidated in 2023, is a planning policy document to provide clear, updated, comprehensive, community-based direction for the Town. Schedule B to the OP designates the Site as "Residential".

Residential policies are provided in Section 2A of the OP and state that in order to ensure a "healthy community, an adequate supply and range of housing types, densities and affordability is required to meet the various needs of Goderich's current and future residents" and that changing demographics in Goderich, including an aging population and smaller household sizes have "created an opportunity for redevelopment, and new development of additional and alternative forms of housing."

A full range of low, medium and high-density residential uses is permitted within the Residential designation, subject to the policies and criteria set out in the OP. High-density uses are defined in Policy 2B as including "apartments, and other multiple unit residential buildings greater than three storeys in height." Section 2B defines residential intensification to mean "changes to a property, site or area which results in a

net increase in residential units or accommodation and includes” the development of vacant or underutilized lots within previously developed areas.

Goals for the Residential designation (Policy 2C) include:

1. To provide a broad range of housing alternatives, to rent, own or lease, and that is provided in sufficient supply and variety in type and cost to meet the varying housing needs of the community,
2. To maintain stable, attractive, and healthy residential neighbourhoods,
3. To introduce and integrate medium density and high density housing into areas of the Downtown Core to create healthy, mixed use neighbourhoods,
4. To permit and facilitate residential intensification and direct this development to locations where land, infrastructure and service facilities are efficiently used, and the use of alternative transportation modes is supported,
5. To establish and implement an affordability target for the Town, to ensure an adequate amount of Goderich’s housing stock is affordable for low to moderate income households, and
6. To encourage the integration of new residential development into established neighbourhoods through consideration of, and sensitivity to, the character, context, and design of the surrounding area.

Section 2D.22 states that the Town shall encourage the development of affordable housing by employing measures such as the waiving of fees, permits, development charges, other levies, density and parking requirements, or any other incentives as deemed appropriate.

It is noted that the Huron County Residential Intensification Guidelines (2020) apply to the proposed new development on the Site. The Applications do not propose any new development, but rather increase the current parking supply and create a new enlarged lot for future development. The potential future development on the lot to be enlarged has been designed to have regard for the Guidelines, including building placement, setbacks and off-street parking.

Planning Analysis

In my professional opinion, the Applications conform to the OP, and are appropriate for the development of the Site and the needs of the residential community in Goderich.

The Consent Application provides for an enlarged parcel to accommodate an infill residential opportunity that complies with all of the requirements in the Town of Goderich Zoning By-law.

The Site has accommodated the existing multi-unit residential building for several decades, and its long-standing presence demonstrates that the built form, unit mix, and associated parking supply have functioned in a compatible manner within the neighbourhood context over time. The Town has advised that it has not received any parking complaints regarding the off-street parking available on the Site, which is

currently limited to 12 spaces. The existing low utilization of on-site parking—both historically and at present—confirms that the residents of this building do not rely heavily on private vehicles.

The building provides affordable rental housing in the form of smaller dwelling units. To maintain affordable rents, not all units are provided with a parking spot. Recognizing the reduced parking supply supports the long-term viability of this affordable rental building and facilitates the ability to provide for infill development on the remaining portion of the land.

Town of Goderich Zoning By-law, 2013

The Town of Goderich Zoning By-law (“By-law”), adopted in 2013, zoned as “Residential Medium Density (R2)” and “Residential High Density (R3)”. The By-law permits multi-unit residential uses within both the R2 and R3 zones. As illustrated on the attached Site Plan, both the Retained Parcel and the Severed Parcel comply with the provisions of the Zoning By-law. The one exception is the required off-street parking for the Retained Parcel.

The Owner is requesting a reduction in the required parking for the Retained Parcel to reflect the historical parking usage for the existing dwelling units.

It is further noted that the existing building on the Retained Parcel is considered legal non-conforming related to the required western interior side yard setback and the rear yard setback.

Four (4) Tests for Minor Variance

Per Section 45(1) of the Planning Act, R.S.O. 1990, c. P.13 there are four (4) tests to be evaluated when considering a Minor Variance Application. The following section outlines the four (4) tests and provides an analysis in relation to the variance sought by the Owner.

Is the application minor?

In my professional opinion, the requested variance is minor in nature. The proposed off-street parking rate for the Retained Parcel exceeds historical usage by the tenants for off-street parking. The Owner is adding two (2) additional parking spaces to the existing parking supply for the existing tenants. Further:

- There is no evidence of parking overflow or neighbourhood disruption, despite the reduced parking condition existing for decades.
- The variance does not alter the built form, height, or massing of the existing building.

Is the application desirable for the appropriate development of the lands in question?

In my professional opinion, the variance will facilitate the continued supply of affordable dwelling units in the Town of Goderich, where higher-density development is directed. The requested variance is desirable as it:

- Supports the continued viability of existing housing in Goderich.
- Avoids imposing unnecessary costs to expand off-street parking that does not have the proven demand.
- Reflects the established operation of the building over many years.
- Ensures the development remains compatible with surrounding land uses, as no negative impacts are anticipated.

Requiring additional parking where it is not needed would not improve the land and could undermine affordability.

Does the application conform to the general intent of the Zoning Bylaw?

In my professional opinion, the variance conforms to the general intent of the By-law. Off-street parking rates are established to ensure that there is sufficient on-site parking to meet the needs of a particular land use, while minimizing spillover parking. The historical usage of parking on the property, combined with the existing form of housing, demonstrates that the existing parking supply meets the actual needs of the residents and fulfills the intent of the Zoning By-law—to provide adequate parking without creating neighbourhood impacts.

Does the application conform to the general intent of the Official Plan?

The Town of Goderich Official Plan supports the full range of housing types, including affordable and rental housing, within the built-up area. Policies encourage efficient use of land, support housing affordability, and promote development that is compatible with surrounding uses. Recognizing the reduced parking requirement through the Applications, maintains the intent of these policies by:

- Supporting the continued provision of long-standing affordable rental housing.
- Avoiding unnecessary land consumption for parking that is not required based on actual demand.
- Ensuring the site continues to function compatibly within the established neighbourhood.

Summary

We trust that the submission will be accepted and circulated for review. If you have any questions, please do not hesitate to contact our team.

Kind regards,



Caroline Baker, MCIP, RPP
Principal

c.c. Owner