

ATTACHMENT F LETTER OF RATIONALE

STRONGITHARM CONSULTING LTD.

July 4, 2019

Mayor Leonard Krog & Members of Council

City of Nanaimo

455 Wallace Street

Nanaimo BC V9R 5J6

Re: Cannabis Retail Rezoning Application for 847 Bruce Avenue

Dear Mayor & Council:

On behalf of our client, TTG Management Ltd. (TTG), we are pleased to submit this application for rezoning to permit the operation of a cannabis retail store at 847/67 Bruce Avenue.

The proposed retail space is part of an attractive new shopping centre, with a high quality of building design and site planning. The proposed commercial unit (#101) is located internal to the shopping precinct, with access to the entrance from a central parking area, and no direct access from the local streets.

Local Service Centre

The *Harewood Neighbourhood Plan* specifically identifies the development of a local service centre on Bruce Avenue. The plan states that the centre will be "characterized by small scale commercial and community services..." and "encourages small independent businesses".

The proposed cannabis retail store will be a small independent outlet designed to serve the local Harewood neighbourhood. The location and use is consistent the objectives of the *Harewood Neighbourhood Plan*.

Site Planning, Use & Access

The proposed retail store will be located in a new commercial centre, where the parking layout, number of stalls, and ingress and egress points meet current bylaw requirements. Utilities, parking lot lighting, and landscaping also meet the City's design standards.

The site planning for the shopping centre is very well suited for a cannabis retail store. The proposed commercial unit (CRU) is located in a small freestanding building that houses a total of three CRUs, and is physically separated from the adjacent grocery store. The parking layout provides a separate parking area for the smaller building.

The mix of uses in the commercial centre, with the neighbourhood grocery store and proposed cannabis retail location, provides convenient shopping for customers who, in one trip, can obtain a range of retail services, thus reducing the number of vehicle trips.

To recap, the key advantages of the proposed retail location include:

- The space is in a new shopping centre with up-to-date requirements for parking and access;
- The shopping centre is located adjacent to Bruce Avenue, which is a designated collector road; and
- The siting of the retail space entrance is not towards the street, but internal to the shopping centre and its parking lot.

The Operator

The operator (TTG) has vast experience in the retail and customer service industry. TTG operates many successful businesses that are regulated by the government, and thoroughly understands the social, health, security, and customer service requirements of such businesses. With a long established track record, TTG's values speak to "community, integrity, and quality". The company has won many awards, and received numerous community acknowledgements. A full profile of TTG is attached to this application.

City of Nanaimo Cannabis Retail Location Criteria

To guide Staff and Council in their consideration of cannabis retail applications, the City established its policy in September 2018. This application complies with the City's criteria in all respects except that a portion of the overall site is located closer than 200 metres to a licensed day care, according to the City's buffer map – a large area of the site is located outside the 200-metre day care buffer so, in principle, meets the criteria (see enclosed plan).

However, from the front door of the proposed retail store to the day care property line on Deering Street, the distance is more than 200 metres if walking, and almost 300 metres if driving (see attached maps), so in actuality this portion of the property also meets the City's criteria.

In addition to its appropriate distance from the day care, this site is a suitable location for this use because:

- The proposed commercial unit faces into the shopping centre, and has no direct relationship with, or view corridor to the day care;
- Access to the shopping centre is from Bruce Avenue, which is identified as a major collector road, and provides a distinct and clear physical separation between uses; and
- In terms of the uses identified and the City policy's reasons for minimum distances, it can be reasonably argued that a day care would be the lowest risk, provided that other impacts, such as traffic, do not deleteriously affect day care operations. It is difficult to imagine that day care clients would be impacted in any way by the operation of a cannabis retail outlet, provided that other mitigating factors apply – that is the case with this application.

Community Amenity Contribution (CAC) Proposal

We are pleased to propose a CAC contribution of \$10,000 to be allocated to amenities as prioritized by the City.

Closing

With the exception of the distance to the day care centre on Deering Street, this application complies with all City of Nanaimo policies and criteria related to cannabis retail rezoning. We believe the location of this site, and the proposed commercial unit, are ideally suited for the intended use, and that this application deserves favourable consideration.

Yours truly,

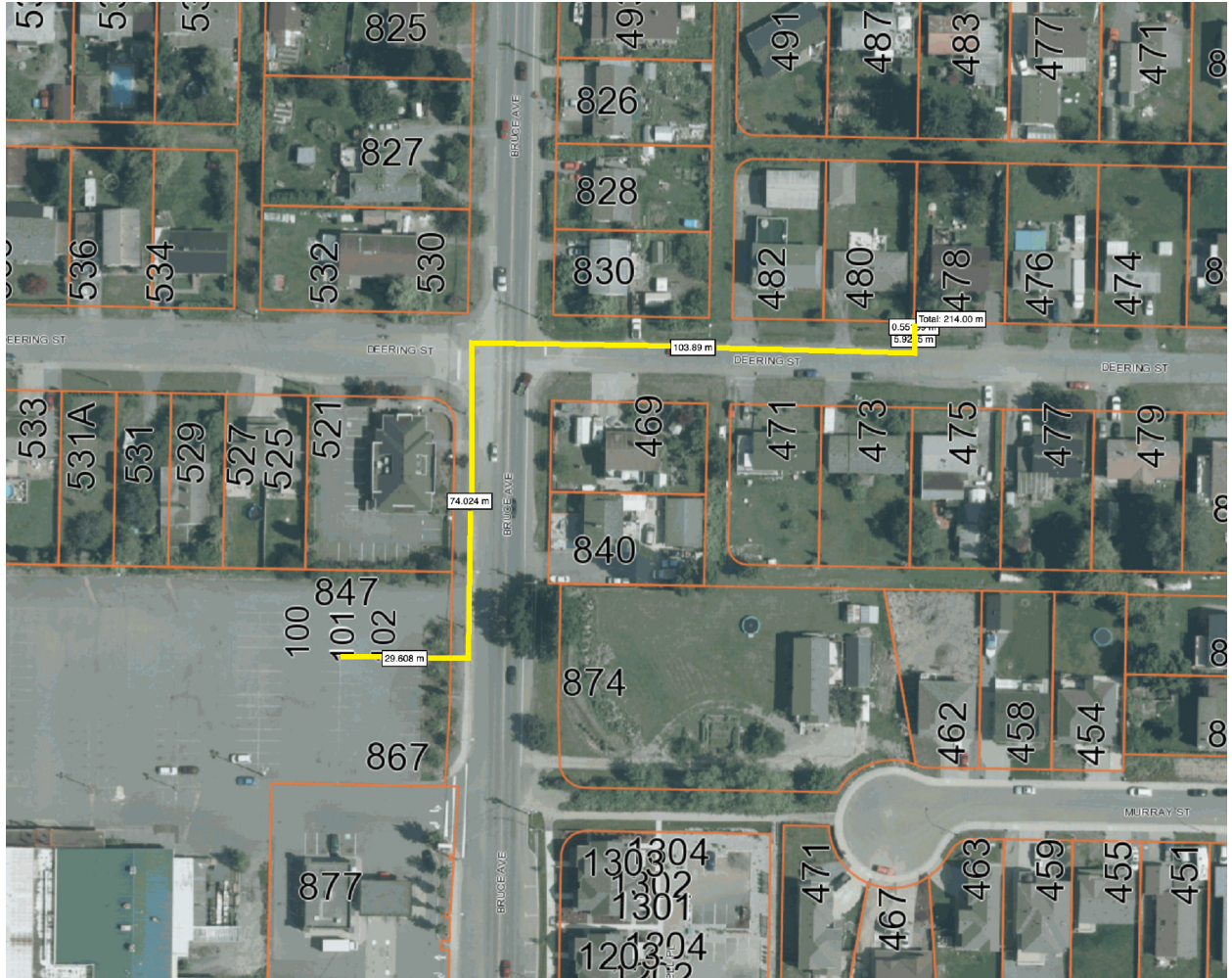
A handwritten signature in black ink, appearing to read "Deane Strongitharm". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Deane Strongitharm, MCIP, RPP

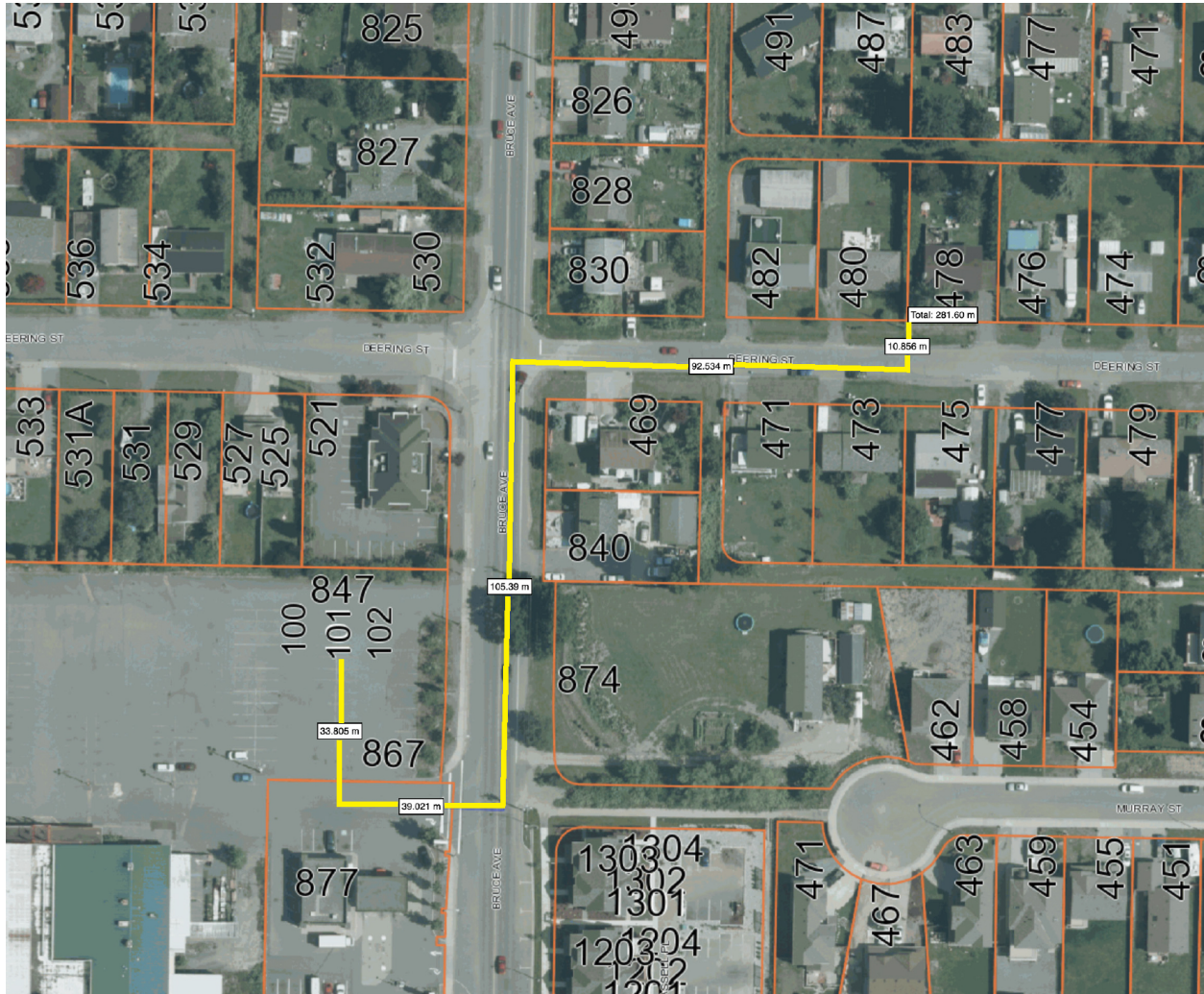
cc: Keith Barbon, TTG Management Ltd.

Attachs.

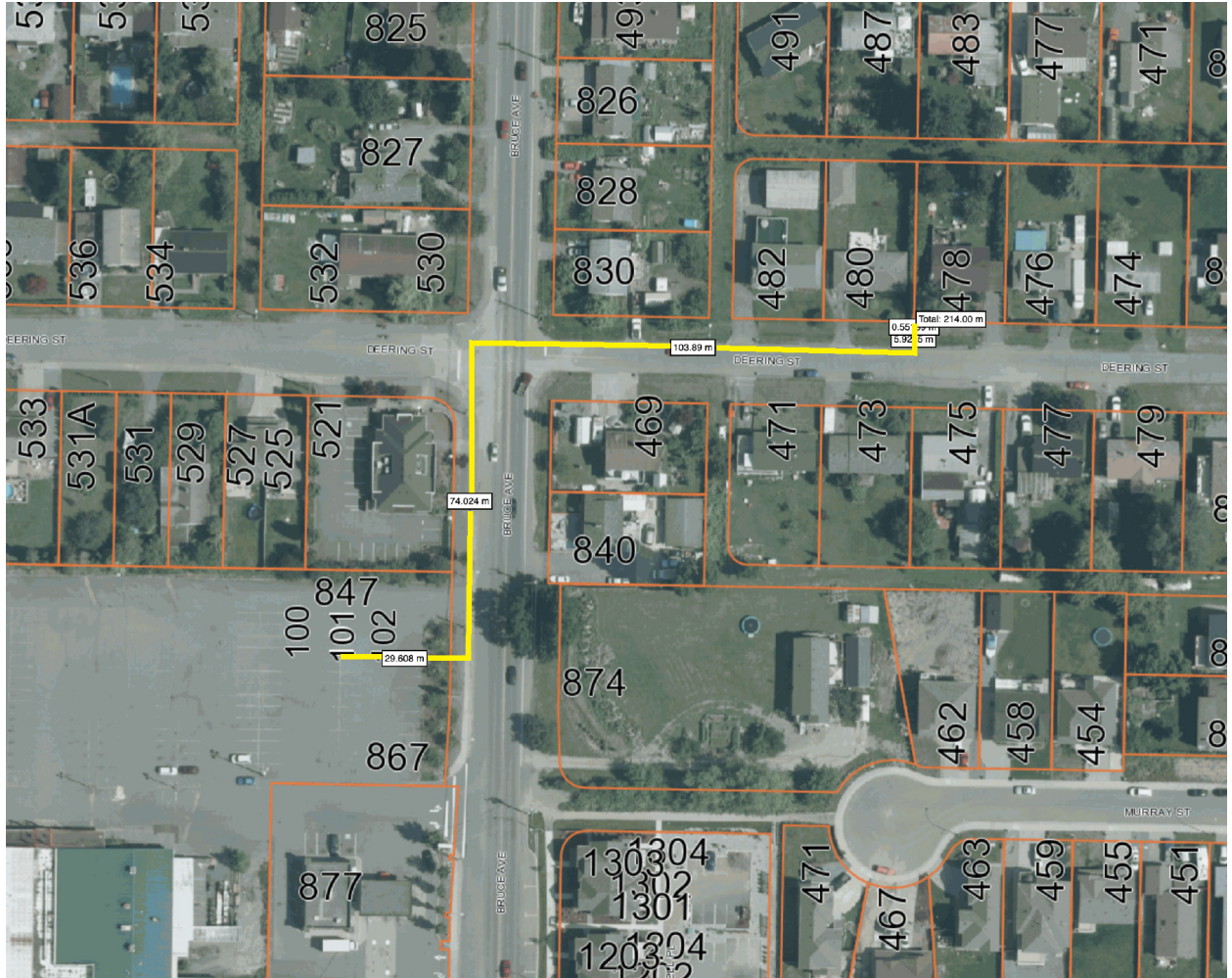
Walking Distance to Day Care on Deering Street (approximately 214 metres)



Driving Distance to Day Care on Deering Street (approximately 282 metres)



Walking Distance to Day Care on Deering Street (approximately 214 metres)



Driving Distance to Day Care on Deering Street (approximately 282 metres)

