

Land Use Planning Opinion

Applications for Official Plan Amendment, Draft Plan of Subdivision & Zone Change

File Nos: OP 23-05-8; SB 23-02-8 and ZN 8-23-07

Farhi Holdings Corporation

401 Lakeview Drive

February 2025

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A. Introduction and Executive Summary

Farhi Holdings Corporation (the “Applicant”) has filed applications for Official Plan Amendment, Zone Change and Draft Plan of Subdivision with respect to 401 Lakeview Drive (the “Subject Property”) in the City of Woodstock. I have been retained to prepare this Land Use Planning Opinion with respect to the development proposal and land use planning applications. I am a Registered Professional Planner (RPP) and full member of the Ontario Professional Planners Institute (OPPI). I have practiced land use planning for over 20 years in communities across Ontario and Canada. I have been qualified as an expert in land use planning by the Ontario Land Tribunal (formerly Local Planning Appeal Tribunal (LPAT) and Ontario Municipal Board (OMB)), as well as the Toronto Local Appeal Body (TLAB). My professional background includes extensive preparing and evaluating Official Plan/Zoning By-Law Amendment and Plan of Subdivision applications within the context of the applicable Provincial and municipal land use planning policy framework.

The Subject Property is located in a predominantly Low-Density Residential community located towards the northern limits of the City and approximately 2 kilometres from the Central Area. These applications will facilitate development of the Subject Property for one low density residential block with 26 semi-detached dwellings, one medium density residential block for 68 stacked townhouses and one high density residential block for 2 seven-storey apartment buildings (consisting of 80 units each). While this proposal includes a total of 254 residential units, an average of 65.3 units per hectare, 63% of these units will be in the proposed High-Density Residential apartment buildings with only 10% being Low-Density Residential (semi-detached units). As outlined in this Land Use Planning Opinion, this proposal represents significant residential intensification relative to the existing and permitted uses on the Subject Property and in the surrounding community.

The purpose and effect of these applications is as follows:

- To introduce High Density Residential uses into a Community Planning District that is predominantly characterized by Low Density Residential with some isolated pockets of Medium Density Residential;
- To increase the maximum density permitted for the proposed Medium Density and High Density Residential uses while relaxing the minimum requirements for visitor parking;
- To increase the maximum height permitted for the proposed Medium Density Residential uses; and
- To relax the minimum performance standards for lot area, front yards, rear yards, side yards, landscaped open space and amenity area intended to provide an appropriate amount of open space and transition/buffering to adjacent properties.

As is discussed in detail in this document, it is my opinion that the proposed residential development and the corresponding Official Plan Amendment, Zone Change and Draft Plan of Subdivision applications do not represent appropriate infill development and intensification of the Subject Property and surrounding Community Planning District for the following reasons:

- The proposal and applications do not facilitate intensification while ensuring that new development is complementary to existing development;
- The proposal is not sensitive to the existing and planned physical character of the Community Planning District and does not satisfy the criteria established in the Official Plan to guide new Medium Density and High Density Residential development;
- The proposal represents a larger scale project that should be directed to the Central Area or a property already designated and planned in the Official Plan for Medium and High Density Residential development;
- The proposed densities and requested relief to the Zoning By-Law regulations represent over-development that will not ensure that the built form, massing and profile of new housing is well integrated and compatible with existing housing and that a compatible transition between lands of different residential densities and between residential and non-residential land uses is achieved;
- There are currently very limited conveniently and appropriately located neighbourhood serving uses and supportive amenities in the surrounding Community Planning District to support the existing and planned residential units, and the development proposal includes no new services and amenities;
- The proposed “Street A” access to County Road No. 59 is limited to right turns only and restricted by the inclusion of an island that will prevent inbound and outbound left turns, which will result in concentration of vehicular movements to and from the Subject Property via Lakeview Avenue and/or U-turns on County Road No. 59;
- The proposed townhouse and apartment dwelling units will not be located close to community serving uses, such as shopping plazas and other facilities;
- The proposed Medium Density Residential uses do not satisfy the Official Plan criteria for designation of new Medium Density Residential sites, including the following:
 - Site be adjacent to the Central Area, designated Shopping Centres and Service Commercial Areas, Community Facilities, High Density Residential Districts or developed Medium Density Residential Districts;
 - Adequate off-street parking and outdoor amenity areas can be provided; and
 - The availability of, and proximity to, existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development.
- The proposed High Density Residential designation will be applied in a location that does not satisfy the following Official Plan criteria:
 - Will result in the preservation of features of the natural environment which may otherwise be compromised with more dispersed low rise development; or
 - Will result in the efficient use of land which may be difficult to develop at a lower residential density due to the presence of environmental constraints and the costs of mitigating such constraints; or
 - Will constitute community land marks or reference points, or
 - Will support the viability and functionality of the Central Area.
- In addition, there is no policy rationale to support re-designation of this Community Facility within a Low Density Residential Area to Medium Density and High Density Residential.

B. Background and Context

B.1 Official Plans and Zoning By-Law

The current and in-force Oxford County Official Plan was adopted to guide and manage the extent, pattern and type of settlement and the use of land and resources desired to maintain and improve the quality of the environment and the quality of life for County residents and to address matters of Provincial interest. The County Official Plan includes the general policies for the County Development Strategy (Section 2.0) and Growth Management Policies (Section 4.0), as well as the specific policies for the City of Woodstock (Section 7.0).

As noted in Section 10.3.5, the Zoning By-Law is the primary means of implementing the policies of the Official Plan. City of Woodstock Zoning By-Law 8626-10 controls the use of land by dividing the municipality into different land use zones, specifying the uses permitted in each zone, specifying where buildings and other structures can be located, stating the types of buildings that are permitted and how they may be used, as well as specifying lot sizes and dimensions, parking requirements, building heights and setbacks from the street.

B.2 The Subject Property

The Subject Property is known municipally as 401 Lakeview Drive and the property location is illustrated in **Figure 1**. The Subject Property has frontage on both Lakeview Drive and Oxford County Road No. 59 and lot area of 3.89 hectares. The existing aerial map included in **Figure 2** illustrates that the Subject Property is currently occupied by a one-storey Government of Ontario building with a significant amount of open space providing spatial separation and buffering to adjacent residential properties to the north and east, and the public realm along Lakeview Drive and Oxford County Road. No. 59. The Subject Property is currently designated “Community Facility” under the County Official Plan and zoned “Community Facility (CF)”. On this basis, any form of residential development requires amendments to both the Official Plan and Zoning By-Law to establish residential land use permissions and regulations.

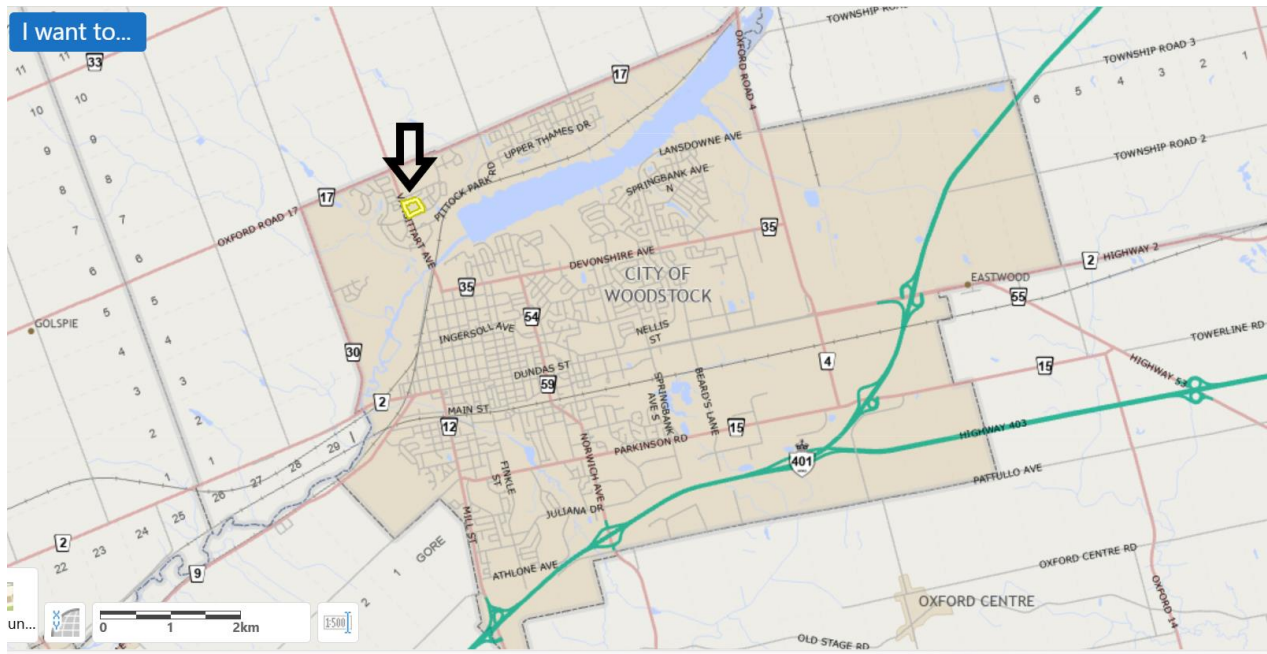


Figure 1 – Location of Subject Property

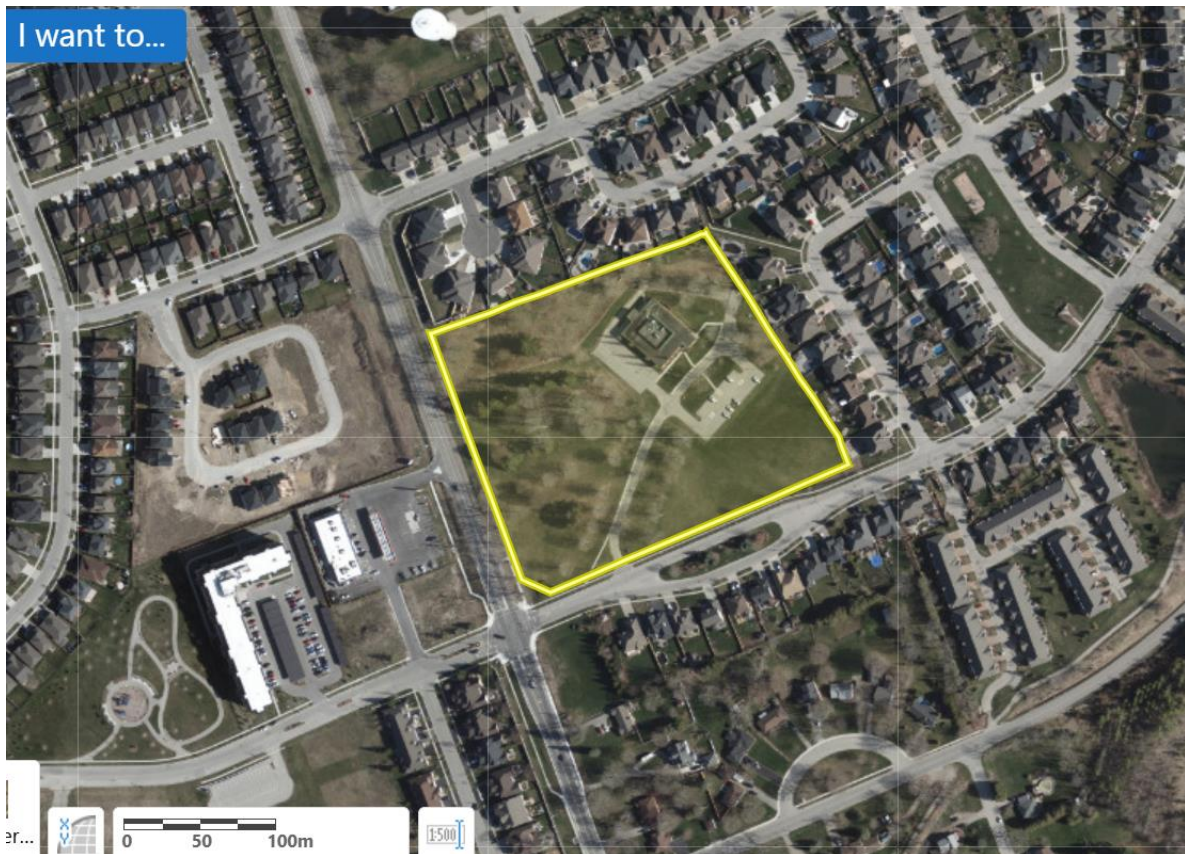


Figure 2 – Aerial Map

B.3 Surrounding Context

As illustrated in the excerpt Schedule W-1 (City of Woodstock Land Use Plan) of the County of Oxford Official Plan included in **Figure 3**, the Subject Property is generally located in a community designated “Residential”. More specifically, the majority of properties in the surrounding Community Planning District are more specifically designated for “Low Density Residential” on Schedule W-3 (City of Woodstock Residential Density Plan), with a small number of isolated pockets designated for “Medium Density Residential” (illustrated in the excerpt provided in **Figure 4**). There are no areas within this Community Planning District designated for “High Density Residential”. The areas designated for “High Density Residential” are generally located closer to the “Central Area” of Woodstock and a significant distance from this Community Planning District. It is also relevant to note that there are very limited existing and permitted commercial and retail properties in proximity to this community to support the existing residential uses. Residents of this community would need to travel to other areas of the City for shopping and services.

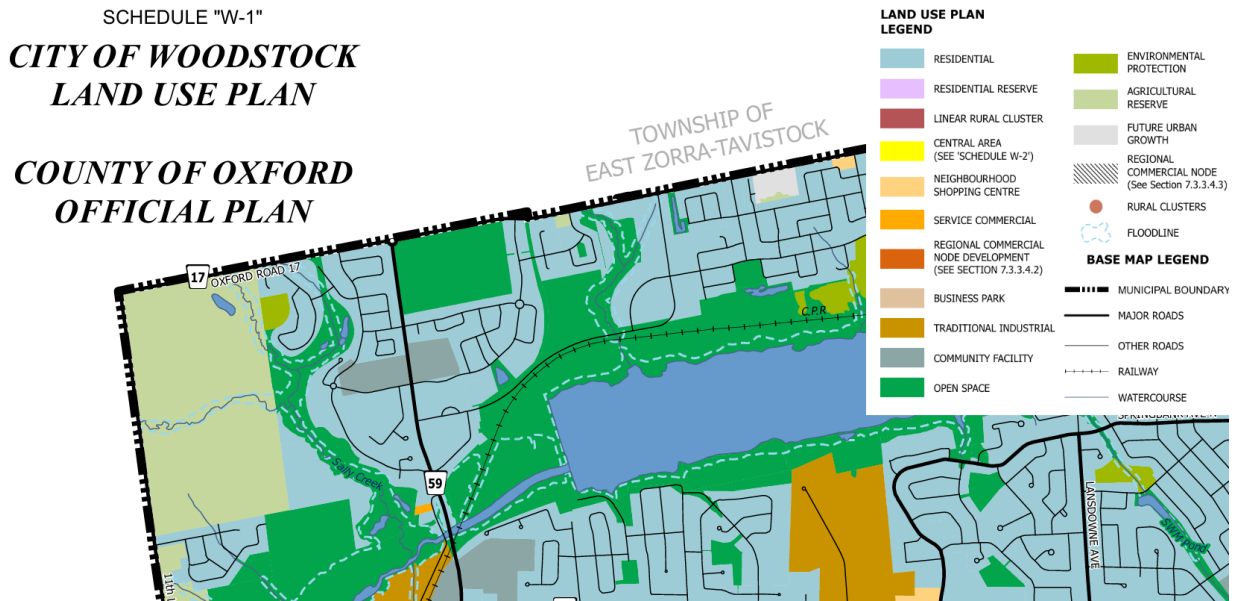


Figure 3 – Excerpt Schedule W-1 (City of Woodstock Land Use Plan) of the County of Oxford Official Plan

SCHEDULE "W-3"
**CITY OF WOODSTOCK
RESIDENTIAL DENSITY PLAN**

**COUNTY OF OXFORD
OFFICIAL PLAN**

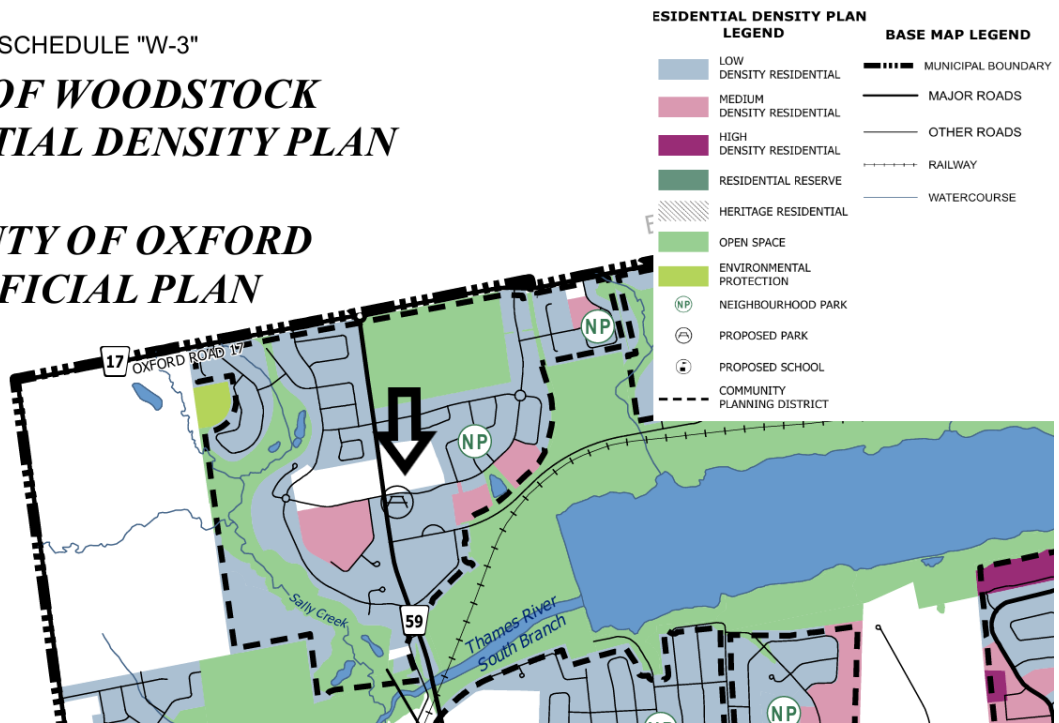


Figure 4 – Excerpt from Schedule W-3 (City of Woodstock Residential Density Plan) of the County of Oxford Official Plan

The adjacent properties to the north, east and south of the Subject Property are designated for “Low Density Residential” and are occupied by single detached dwellings fronting onto Ridgewood Court, Westview Court, Crestwood Court and Lakeview Drive. As illustrated on the Zoning Map in **Figure 5**, these properties are zoned “Residential Type 1 (R1)”, which permits only single detached dwellings, and “Residential Type 2 (R2)”, which also permits semi-detached and duplex dwellings. The properties to the west are designated “Community Facility” and zoned PUD-1 and PUD-2.

Per Sections 28.4.1 and 28.4.2.1 of the Zoning By-Law, the PUD-1 and PUD-2 zones permit the following residential uses and explicitly prohibit an apartment dwelling house greater than 5 storeys:

- an apartment dwelling house;
- a bed and breakfast establishment;
- a boarding or lodging house;
- a converted dwelling house;
- a duplex dwelling house;
- a dwelling unit in a portion of a non-residential building;
- a home occupation in a permitted dwelling house;
- a horizontally-attached dwelling house;
- a multiple attached dwelling house;

- a semi-detached dwelling house;
- a single-detached dwelling house; and
- a street row dwelling house.



Figure 5 – Zoning Map of Subject Property and Surrounding Area

C. Proposed Development

The proposed development includes 5 blocks, consisting of one low density block for 26 semi-detached dwellings, one medium density block for 68 stacked townhouses, one high density block for 2 seven storey apartment buildings (consisting of 80 units each), one park block and a storm water management block, served by one new local street. The proposed site plan is included in **Figure 6**. In addition to the Draft Plan of Subdivision application to create these blocks, applications for Official Plan Amendment and Zone Change are required to facilitate the development proposal. There are no commercial or non-residential uses proposed to support the proposed residential dwelling units.



Figure 6 – Proposed Site Plan

The purpose of the proposed Official Plan Amendment (OP 23-05-8) is to redesignate the Subject Property from “Community Facility” to Low, Medium and High Density Residential and Open Space to facilitate the development proposal, including a site-specific policy to permit a maximum residential density of 75 units per hectare for the medium density townhouse blocks (maximum of 70 units/hectare permitted) and a maximum residential density of 151 units/hectare for the high density residential block (maximum of 150 units/hectare permitted). Not only will the Official Plan Amendment introduce built form and density that does not exist and is not currently permitted in the surrounding Community Planning District, the OPA also seeks to exceed the maximum permitted density for both the proposed Medium Density and High Density Residential uses.

The purpose of the Zone Change (ZN 8-23-07) is to rezone the Subject Property from “Community Facility Zone (CF)” to “Residential 2 Zone (R2)”, “Special Residential Zone 3 (R3-sp)”, “Special Residential Zone 4 (R4-sp)” and “Special Active Use Open Space Zone (OS2-sp)”. In addition to introducing High Density Residential into this community, the Zone Change is also seeking the following relief to the prevailing zoning regulations:

- Special Provisions for the R3 Zone for Block 2 (Medium Density Residential – 4-storey Stacked Townhouses)
 - Reduce the minimum lot area from 150 m² per unit to 130 m² per unit;

- Provide for a reduced front yard depth of 5.5 metres to the main building;
 - Increase the maximum building height from 3 to 4 storeys (14 metres);
 - Relief from parking requirements in Section 5.4.2.4 to waive the requirement for visitor parking.
- Special Provisions for the R4 Zone for Block 3 (High Density Residential – 7-storey Apartment Buildings)
 - Provide for a front yard depth and exterior side yard width of 4.5 metres (to Street A);
 - Provide for a reduced rear yard depth of 6.5 metres;
 - Provide for a reduced interior side yard width of 3 metres (adjacent to Open Space Zone);
 - Provide for a reduced exterior side yard width of 6 m (Oxford Road 59);
 - Reduce the minimum required landscaped open space from 35% of lot area to 27% of lot area;
 - Reduce the minimum amenity area per dwelling unit from 20 m² to 19 m²;
 - Relief from parking requirements in Section 5.4.2.4 to waive the requirement for visitor parking.

The purpose and effect of these applications is as follows:

- To introduce High Density Residential uses into a Community Planning District that is predominantly characterized by Low Density Residential with some isolated pockets of Medium Density Residential;
- To increase the maximum density permitted for the proposed Medium Density and High Density Residential uses while relaxing the minimum requirements for visitor parking;
- To increase the maximum height permitted for the proposed Medium Density Residential uses; and
- To relax the minimum performance standards for lot area, front yards, rear yards, side yards, landscaped open space and amenity area intended to provide an appropriate amount of open space and transition/buffering to adjacent properties.

D. Land Use Planning Analysis

My land use planning analysis will outline my opinion that the proposal represents over-development of the Subject Property that does not conform to and implement the development and growth management strategy and policies that apply to the City of Woodstock, particularly the Community Planning District in which the Subject Property is located. My analysis focuses on the following:

- The matters of Provincial Interest set out in Section 2 of the Planning Act;
- The matters set out in Section 51(24) of Planning Act that relate to subdivision of land;
- Provincial Policy Statement, 2024; and
- The applicable policies of the Oxford County Official Plan.

D.1 Land Use Planning Policy Overview

D.1.1 Matters of Provincial Interest

Section 2 of the Planning Act requires that the Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities to have regard to a number of matters of provincial interest, including the following:

- (h) the orderly development of safe and healthy communities;
- (k) the adequate provision of employment opportunities;
- (p) the appropriate location of growth and development;
- (r) the promotion of built form that,
 - (i) is well-designed,
 - (ii) encourages a sense of place, and
 - (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;

D.1.2 Section 51(24) of Planning Act

Section 51(24) of the Planning Act requires that, in In considering a draft plan of subdivision, regard shall be had to the following matters:

- (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;
- (b) whether the proposed subdivision is premature or in the public interest;
- (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;
- (d) the suitability of the land for the purposes for which it is to be subdivided; and
- (f) the dimensions and shapes of the proposed lots.

D.1.3 Provincial Policy Statement, 2024

The Provincial Planning Statement, 2024 (PPS 2024) is a policy statement issued under the authority of section 3 of the Planning Act and came into effect on October 20, 2024. The Provincial Planning Statement applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. In respect of the exercise of any authority that affects a planning matter, section 3 of the Planning Act requires that decisions affecting planning matters shall be consistent with policy statements issued under the Act.

In Chapter 1, municipal official plans are identified as the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning. Zoning by-laws are also identified as important for the implementation of the Provincial Planning Statement and

Zoning By-Laws are to be “forward-looking and facilitate opportunities for an appropriate range and mix of housing options for all Ontarians”.

Chapter 2 contains the policies for “Building Homes, Sustaining Strong and Competitive Communities”. With respect to Strategic Growth Areas, Section 2.4.1 includes the following policies:

1. Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.
2. To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned: a) to accommodate significant population and employment growth; b) as focal areas for education, commercial, recreational, and cultural uses; c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and d) to support affordable, accessible, and equitable housing.
3. Planning authorities should: a) prioritize planning and investment for infrastructure and public service facilities in strategic growth areas; b) identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas; c) permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form; d) consider a student housing strategy when planning for strategic growth areas; and e) support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential.

D.1.4 Oxford County Official Plan

Section 7.0 of the County Official Plan includes the City of Woodstock Land Use Policies. Section 7.1 outlines the Municipal Development Strategy and includes the following Strategic Initiative in Section 7.1.1:

- The City of Woodstock promotes appropriate infill development and intensification of land and buildings in existing built up areas of the municipality. The policies of this Plan are designed to facilitate intensification while ensuring that new development is complementary to existing development.

Section 7.2 includes the policies for Housing Development and Residential Areas. The strategic approach outlined in Section 7.2.1 includes the following:

- Ensure that new housing is of a human scale and is sensitive to and improves the existing physical character of the area, using the criteria established in the Official Plan to guide new development.

Section 7.2.2 includes the specific policies for Housing Development, including the following policies for Residential Intensification in Section 7.2.2.5:

- Residential intensification is permitted in appropriate locations within the Residential and Central Areas of the City, subject to complying with the policies of the associated land use designations pertaining to the density, form and scale of residential development being proposed.
- It is not intended that residential intensification will occur uniformly throughout the City. The location, form and intensity of residential intensification will be determined by the policies of the various land use designations, with the intention of permitting smaller scale developments, such as individual infill lots in areas designated as Low Density Residential and directing larger scale projects to areas designated as Medium and High Density Residential and Central Area.
- Residential intensification and compact urban form shall be facilitated through appropriate zoning standards and City Council may consider the use of reduced municipal infrastructure requirements and lot standards on a site or area specific basis, provided that such standards are still in keeping with the overall objectives of the Plan.

Section 7.2.3.1 includes the Objectives for all Residential Designations in order to “Provide for a supply of residential lands that is sufficient to accommodate the anticipated demand for a broad range of new dwelling types over the planning period, through residential intensification and, if necessary, designated growth areas.” In other words, the residential designations applied to individual properties throughout the City are intended to facilitate a sufficient amount of growth through residential intensification. The additional objectives identified in Section 7.2.3.1 include the following:

- Ensure that the built form, massing and profile of new housing is well integrated and compatible with existing housing and that a compatible transition between lands of different residential densities and between residential and non-residential land uses is achieved.
- Facilitate the provision of conveniently and appropriately located neighbourhood serving uses and supportive amenities which enhance the quality of the residential environment in residential areas.

Section 7.2.3.2 indicates that the Community Planning Districts have been established to assist in achieving the objectives for Residential Areas. Section 7.2.3.2.1 specifically relates to Established Communities and directs that “Within existing built-up Community Planning Districts, it is anticipated that further residential development will largely occur through residential intensification consistent with the policies of the Low Density, Medium Density and High Density Residential Districts, as applicable, and in conformity with Schedule W-3.”

The policies for Low Density Residential Districts are included in Section 7.2.4, including the following:

- The maximum net residential density for an individual development in the Low Density Residential District is 30 units per hectare (12 units per acre) and no building shall exceed three storeys in height at street elevation.

- Multiple unit dwellings, such as cluster, townhouse and low rise apartments in Low Density Residential Districts, will generally be restricted to the following areas:
 - sites which are close to community serving uses, schools, shopping plazas, day care facilities, churches, arenas and parks.

Section 7.2.4.1.3 includes specific policies for Infill Subdivisions in Low Density Residential Districts. Where infill development is proposed on vacant or underutilized sites within established residential areas by plan of subdivision, City Council and County Council will ensure that:

- the nature of the proposed residential development will be evaluated having regard to the type of housing found in the surrounding residential neighbourhood;
- measures will be incorporated into the subdivision design to buffer and screen existing residential uses from the new development;
- proposed multiple unit developments will comply with the multiple unit requirements for Low Density Residential areas.

Section 7.2.4.1.4 requires that all infill proposals comply with the provisions of the Zoning By-Law and other municipal by-laws.

The policies for Medium Density Residential Areas are included in Section 7.2.5 and include the following:

- The maximum net residential density in the Medium Density Residential Districts is 70 units per hectare (30 units per acre) and no building shall exceed four storeys in height at street elevation.
- Any further Medium Density Residential designations will be consistent with the following location criteria:
 - sites which abut arterial or collector roads or sites situated in a manner which prevents traffic movements from the site from flowing through any adjoining Low Density Residential Districts;
 - sites which are close to community supportive facilities such as schools; shopping plazas, institutional, recreational and open space areas;
 - sites which are adjacent to the Central Area, designated Shopping Centres and Service Commercial Areas, Community Facilities, High Density Residential Districts or developed Medium Density Residential Districts.
- In addition to the requirement for compliance to the locational policies; when considering proposals to designate lands for medium density residential development, City Council and County Council will be guided by the following:
 - adequate off-street parking and outdoor amenity areas can be provided;
 - the availability of, and proximity to, existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development.

The policies for High Density Residential Areas are included in Section 7.2.6 and include the following:

- This designation shall be applied in a localized and site specific manner in locations where high density high rise development can:
 - result in the preservation of features of the natural environment which may otherwise be compromised with more dispersed low rise development, or
 - result in the efficient use of land which may be difficult to develop at a lower residential density due to the presence of environmental constraints and the costs of mitigating such constraints; or
 - constitute community land marks or reference points, or
 - support the functionality of the municipal transit system, or
 - support the viability and functionality of the Central Area.
- Height and density limitations will be specified in the Zoning By-Law and may vary from location to location. Unless there are specific site or area characteristics which favour higher limits, net residential densities will normally not exceed 150 units per hectare (60 units per acre).
- In addition to areas predominantly composed of existing or planned High Density Residential development as identified on Schedules W 2 and W-3, any further designations will be consistent with the following location criteria:
 - the site will generally have direct access to arterial and collector roads;
 - on vacant or under utilized sites adjacent to development which is already built at medium or high densities;
 - close to community services and neighbourhood conveniences such as shopping plazas, institutional, recreational and open space facilities;
 - sites which are adjacent to the Central Area, designated Shopping Centres or Community Facilities.
- High Density Residential development will generally be discouraged adjacent to Low Density Residential development except where such low density development is proposed for redevelopment to higher density land uses or where considerable separation between the low density area and the proposed high density development exists.
- In addition to the requirement for compliance to the locational policies, when considering proposals to designate lands for High Density Residential development, City Council and County Council will be guided by the following:
 - adequate off-street parking and outdoor amenity areas can be provided;
 - the availability of, and proximity to existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development.

D.2 Land Use Planning Analysis and Opinion

It is my opinion that the proposed residential development and the corresponding Official Plan Amendment, Zone Change and Draft Plan of Subdivision applications do not represent appropriate infill development and intensification of the Subject Property and surrounding Community Planning District for the following reasons:

- The proposal and applications do not facilitate intensification while ensuring that new development is complementary to existing development;
- The proposal is not sensitive to the existing and planned physical character of the Community Planning District and does not satisfy the criteria established in the Official Plan to guide new Medium Density and High Density Residential development;
- The proposal represents a larger scale project that should be directed to the Central Area or a property already designated and planned in the Official Plan for Medium and High Density Residential development;
- The proposed densities and requested relief to the Zoning By-Law regulations represent over-development that will not ensure that the built form, massing and profile of new housing is well integrated and compatible with existing housing and that a compatible transition between lands of different residential densities and between residential and non-residential land uses is achieved;
- There are currently very limited conveniently and appropriately located neighbourhood serving uses and supportive amenities in the surrounding Community Planning District to support the existing and planned residential units, and the development proposal includes no new services and amenities;
- The proposed “Street A” access to County Road No. 59 is limited to right turns only and restricted by the inclusion of an island that will prevent inbound and outbound left turns, which will result in concentration of vehicular movements to and from the Subject Property via Lakeview Avenue and/or U-turns on County Road No. 59;
- The proposed townhouse and apartment dwelling units will not be located close to community serving uses, such as shopping plazas and other facilities;
- The proposed Medium Density Residential uses do not satisfy the Official Plan criteria for designation of new Medium Density Residential sites, including the following:
 - Site be adjacent to the Central Area, designated Shopping Centres and Service Commercial Areas, Community Facilities, High Density Residential Districts or developed Medium Density Residential Districts;
 - Adequate off-street parking and outdoor amenity areas can be provided; and
 - The availability of, and proximity to, existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development.
- The proposed High Density Residential designation will be applied in a location that does not satisfy the following Official Plan criteria:
 - Will result in the preservation of features of the natural environment which may otherwise be compromised with more dispersed low rise development; or
 - Will result in the efficient use of land which may be difficult to develop at a lower residential density due to the presence of environmental constraints and the costs of mitigating such constraints; or

- Will constitute community land marks or reference points, or
- Will support the viability and functionality of the Central Area.
- In addition, there is no policy rationale to support re-designation of this Community Facility within a Low Density Residential Area to Medium Density and High Density Residential.

Regards,



Michael Barton, MCIP, RPP