



774 Bronson Avenue, Ottawa

Planning Rationale Addendum No. 1
Zoning By-law Amendment and Site Plan Control
July 28, 2023

FOTENN

Prepared for Katasa Group

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1.0 Introduction

Fotenn Planning + Design (“Fotenn”) previously prepared a Planning Rationale and Design Brief in support of Zoning By-law Amendment and Site Plan Control applications for the lands located at 770 and 774 Bronson Avenue and 557 Cambridge Street South.

This report is an addendum to the July 2021 Planning Rationale and Design Brief prepared by Fotenn and reviews the proposed development in light of the City’s new Official Plan, in-force as of November 4, 2022.

It should be noted that, while this Addendum has been prepared at the request of the City to review the new Official Plan, it is Fotenn’s opinion that, given the new Official Plan was neither Council adopted, nor Ministry-approved at the time of the applications (i.e. July 16, 2021), that the policies of the old Official Plan (2003, as amended), continue to be the policies against which the proposed development application should be assessed.

This Addendum should be read in conjunction with the July 2021 Planning Rationale. All opinions and findings of the original report remain valid.

1.1 Summary of Applications

Both sites had previously been rezoned through site-specific Zoning By-law Amendments by separate entities. The lands at 774 Bronson and 557 Cambridge Street were originally rezoned in 2012 to establish the site-specific permissions and permit a 12-storey building along Bronson Avenue. In 2017, the new owner of the lands further revised the site-specific permissions for the lands to revise the site-specific schedule and modify other zoning requirements while continuing to permit a 12-storey building. The lands at 770 Bronson were rezoned in 2017 to permit a 6-storey mixed-use building on the site. The two sites have now been acquired by Katasa Group and are being planned as a singular development.

Fotenn submitted Zoning By-law Amendment and Site Plan Control applications for the combined properties to permit the proposed development, which included a 26-storey high-rise residential building with a nine (9) storey podium. The proposed Zoning By-law Amendment seeks to normalize the split-zoned site. The properties at 774 Bronson and 557 Cambridge Street South are currently zoned “Arterial Mainstreet, Subzone 1, Exception 2003, Schedule 296 (AM1[2003] S296)”. The lands at 770 Bronson are currently zoned “Arterial Mainstreet, Subzone 10, Exception 2373 (AM10[2373])”. The proposed Zoning By-law Amendment would rezone the lands to “Arterial Mainstreet, Subzone 10, with a new site-specific exception and schedule (AM10 [XXXX] SYYY).

A concurrent Site Plan Control Application for the proposed development was submitted to resolve site-specific design considerations such as landscaping, servicing locations, and building materiality.

Summary of Changes

The proposed development has been revised and refined since the original submission in July 2021 to respond to public consultation, Urban Design Review Panel (UDRP) comments, and feedback and comments received from the City of Ottawa's technical review of the application. The changes are summarized as follows:

- / The building height has been reduced from 26 to 22 storeys;
- / The high-rise tower (above 9 storeys) has been pulled south and east, to provide additional separation from the intersection and increase the separation to the property to the west (increasing the setback to 8.2 metres);
- / Adding retail space at grade at the intersection of Bronson and Carling;
- / Splitting the proposed building into two (2) parts above grade, connected by the underground parking garage;
- / Significant changes to the parking garage to reduce the height of the building along Cambridge Street North and removing the need for retaining walls along the street;
- / Pulling the building back along Cambridge Street to provide greenspace along the street and a POPS accessible to the community;
- / Minimizing the size of the access on Cambridge Street North and making changes to move traffic towards Carling Avenue;
- / Revisions to the loading and servicing areas to improve efficiency and allow for servicing of the retail space.
- / Step backs along Bronson Avenue have been added to maintain the pedestrian scale along Bronson.
- / The building has been setback to allow for street trees along the entire frontage along Bronson Avenue.
- / Increased landscaping across the site.

Policy and Regulatory Framework

3.1 City of Ottawa Official Plan (2022)

The Official Plan for the City of Ottawa was approved November 4, 2022, more than a year following submission of the current applications. The Plan is reviewed here for context, but it remains Fotenn’s opinion that the project needs to be assessed against the 2003 Official Plan in force at the time the applications were submitted.

The Official Plan provides a framework for the way that the City will develop until 2046 when it is expected that the City’s population will surpass 1.4 million people. The Official Plan directs how the city will accommodate this growth over time and set out the policies to guide the development and growth of the City.

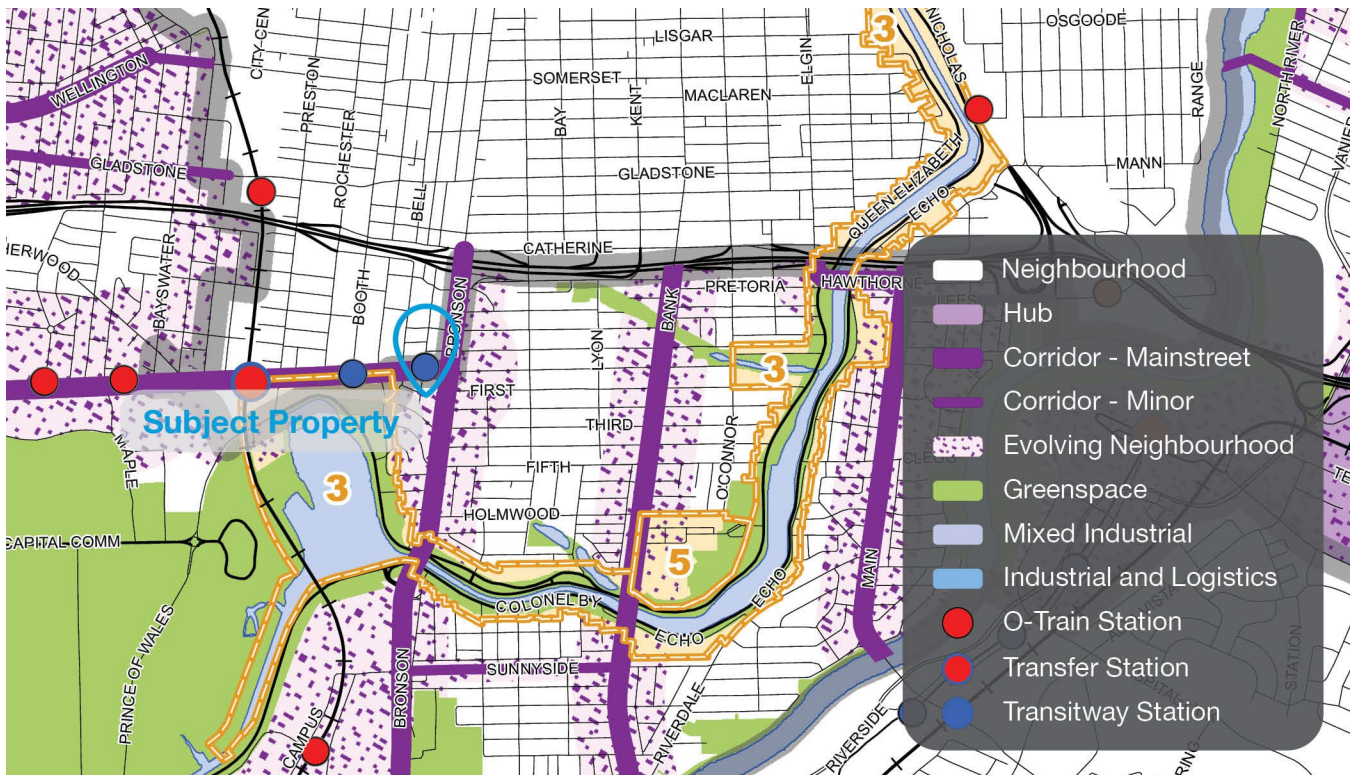


Figure 1: City of Ottawa Official Plan, Schedule B2 - Inner Urban Area

3.1.1 Transect and Land Use Designation

The subject property is designated as a “Corridor - Mainstreet” within the “Inner Urban Transect” on Schedule B2 of the Official Plan. The Inner Urban Transect includes the pre-World War II neighbourhoods that immediately surround the Downtown Core Transect, and the earliest post-World War II areas directly adjacent to them. Generally, the older neighbourhoods, such as the neighbourhood around the subject property, reflect urban built form characteristics.

Corridors are bands of land along specified streets whose planned function combines a higher density of development, a greater degree of mixed uses, and a higher level of street transit service than abutting Neighbourhoods but lower density than nearby Hubs.

Policy 6.2.1.1 states that the Corridor designation applies to any lot abutting the Corridor, subject to generally a maximum depth of 220 metres from the centreline of the Mainstreet.

The proposed development fronts onto both Carling Avenue and Bronson Avenue, both designated as a Mainstreet Corridor and the entirety of the subject property is located within 220 metres of the centreline of both streets.

Per policy 5.2.1.3, the Inner Urban transect is generally planned for mid- to high-density development subject to proximity and access to frequent street transit or rapid transit, limits on building height and massing per the functional designation, the separation of towers, and the urban design policies of Section 4.6.

Policy 5.2.1.4 states that the Inner Urban Transect shall continue to develop as a mixed-use environment where Hubs and a network of Mainstreets and Minor Corridors provide residents with a full range of services within a walking distance from home, in order to support the growth of 15-minute neighbourhoods.

The proposed development seeks to redevelop an important corner at Bronson and Carling Avenue with a mixed-use development that will feature retail use on the corner and residential uses above. The proposed development is adjacent to a planned rapid transit station at Carling/Bronson and is located within a 15-minute walk of amenities along Bronson Avenue, Preston Street, and Bank Street.

Per policy 5.2.2.2, the transportation network for the Inner Urban Transect shall prioritize walking, cycling, and transit and accommodate vehicular access and movement in such a way that does not erode the public realm or undermine the priority of active modes of transportation.

Policy 5.2.2.3 encourages parking to be underground and out-of-sight and accessed by common driveways to minimize the impact on the public realm.

The proposed development minimizes the impact of the vehicular access points and proposes significant improvements to the public realm on all street edges through street trees, greenspace, and clear sidewalks. The proposed development also includes 221 bicycle parking spaces to serve the residential units and is proposing a reduction in vehicular parking to 0.47 spaces/unit (from 0.5 spaces/unit). Finally, the proposed development is adjacent to a future Bus Rapid Transit (BRT) station planned for Carling Avenue and Bronson Avenue providing improved bus frequency and service to the Trillium Line to the west.

The proposed development proposes two (2) vehicular access points to the underground parking garage including an in/out access onto Bronson Avenue and an out only onto Cambridge Street South. The access point to Cambridge Street South has been determined, through technical study, to be necessary for the orderly function of the site. Vehicles will be directed north to Carling Avenue.

Section 5.2.3 provides direction to development along Mainstreet Corridors within the Inner Urban Transect. Specifically, policy 5.2.3.2 states that along Mainstreets, permitted building heights are as follows, subject to appropriate height transitions, stepbacks, and angular planes:

- / On sites that front on segments of streets whose right-of-way (after widening requirements have been exercised) is 30 metres or greater, and where the parcel is of sufficient size to allow for a transition in built form massing, not less than 2 storeys and up to High-rise (40 storeys);
- / On sites that front on segments of streets whose right-of-way is narrower than 30 metres, generally up to 9 storeys except where a secondary plan or area-specific policy specifies different heights.

In the case of the proposed development, it fronts both the Carling Avenue and Bronson Avenue Mainstreet. Carling Avenue has a protected width of 44.5 metres whereas Bronson Avenue has a protected width of 23 metres. The proposed development's front lot line, per the Zoning By-law definition, is along Carling Avenue and therefore the proposed 22-storey tower is appropriate. The proposed development incorporates significant stepbacks and setbacks above the fourth and ninth storey to transition to the south along Bronson Avenue and towards the low-rise neighbourhood to the southwest.

In all cases, the wall heights directly adjacent to a street, and the heights of the podiums of High-rise buildings, where permitted, shall be proportionate to the width of the abutting right of way, and consistent with the objectives in the urban design section on Mid-rise and High-rise built form in Subsection 4.6.6, Policies 7, 8 and 9.

The proposed development features a podium height of approximately 14 metres along Bronson Avenue. The response to Section 4.6.6 is discussed below.

Per policy 5.2.3.4, all buildings along Mainstreets shall have active entrances facing the Mainstreet.

The proposed development features entrances to the proposed retail space along both Carling Avenue and Bronson Avenue while the main residential entry is located along Bronson Avenue.

Policy 6.2.1.2 states that development within the Corridor designation shall establish buildings that locate the maximum permitted building heights and highest densities close to the Corridor, subject to building setbacks where appropriate. Further, development shall ensure appropriate transitions in height, use of land, site design and development character through the site, to where the Corridor designation meets abutting designations.

Per policy 6.2.1.3, Corridors will generally permit residential uses and such non-residential uses that integrate with a dense, mixed-use urban environment.

The proposed development will introduce a mix of uses on the subject property with retail at-grade and a mix of housing types above, in a dense format. The proposed tower has been located closest to the Mainstreets with appropriate setbacks and setbacks to transition to the west and south, while also providing an appropriate scale at the intersection of Carling Avenue and Bronson Avenue.

Policy 6.2.1.4 states that where a development fronts both a Corridor and a parallel street or side street, development shall address the Corridor and vehicular access shall generally be provided from the parallel or side street.

The proposed development includes a site access from Bronson Avenue to address community concerns regarding cut-through traffic. An exit only (together with the loading and servicing access) is provided from Cambridge Street South for functionality. Vehicles exiting the Cambridge Street access will be directed north towards Carling Avenue to travel towards Bronson and then north or south.

3.1.2 Growth Management Framework

Ottawa's population is projected to grow by 40 per cent between 2018 and 2046. Much of the demand for new housing is expected to be for ground-oriented units, such as single-detached, semi-detached, rowhouse dwellings and new forms not yet developed. Within the Greenbelt, where most of the housing growth in the built-up area is expected to occur, new housing development will be both in the form of larger dwelling units and apartments.

The Official Plan allocates 47 per cent of growth to the built-up portion of the urban area and 46 per cent to the greenfield portion of the urban area, with the balance going to the rural areas of the City. The target amount of dwelling growth in the urban area that is to occur through intensification is 51 per cent and represents the proportion of new residential dwelling units, excluding institutional and collective units such as senior's and student residences, based upon building permit issuance within the built-up portion of the urban area (3.2.1).

Per 3.2.2, intensification is anticipated to occur in a variety of built forms and height categories, from Low-rise to High-Rise 41+ buildings, provided density requirements are met. The Official Plan defines four (4) height categories, including:

- / Low-rise: up to and including 4 storeys;
- / Mid-rise: between 5 and 9 full storeys;
- / High-rise: between 10 and 40 full storeys; and,
- / High-rise 41+: 41 full storeys or taller.

The vast majority of Residential intensification shall focus within 15- minute neighbourhoods, which are comprised of Hubs, Corridors and lands within the Neighbourhood designations that are adjacent to them as shown on Schedules B1 through B8 (3.2.3). Policy 3.2.4 states that intensification is permitted in all designations where development is permitted taking into account whether the site has municipal services and conformity with the Transect and Overlay policies, as applicable.

The proposed development seeks to permit approximately 278 new residential units on a vacant, underutilized parcel within the City's built-up area and will contribute positively to the City's objectives for managing growth and the targets for growth in the form of apartments.

The area surrounding the subject property has many of the attributes of a 15-minute neighbourhood with retail, restaurants, schools, parks, employment opportunities, and other services all located within a 15-minute walk. The proposed development will support the 15-minute neighbourhood with new retail space along the Mainstreet ideal for community-serving uses.

Residential intensification should occur in a variety of dwelling unit sizes to provide housing choice (per policy 3.2.8). The Official Plan defines two broad dwelling size categories:

- / Small-household dwellings are units with up to 2 bedrooms and are typically within apartment-built forms; and,
- / Large-household dwellings are units with three or more bedrooms, or an equivalent floor area, and are typically within ground-oriented built forms.

Table 2 establishes residential intensification targets by dwelling sizes. This includes a target of 49,000 ground-oriented/large-household dwellings and 43,000 apartment/small-household dwellings over the life of the Official Plan (3.2.9). Table 3b establishes the minimum requirement for large-household dwellings along Mainstreets of five (5) per cent, with a target of ten per cent.

The proposed development includes 23 3-bedroom, 21 4-bedroom and six 5-bedroom units within the development, representing approximately 18% of the proposed units.

Policy 3.2.10 states that generally, higher densities will be directed to Mainstreets, Minor Corridors, rapid transit stations, Hubs and major neighbourhood amenities, with lower densities further away.

For Mainstreets, Table 3b sets a target residential density for intensification of 120 dwellings per net hectare. Per 3.2.12, the density targets in Table 3b and the overall Growth Management Targets in Table 2 shall be implemented in the Zoning By-law through a municipality initiated zoning conformity exercise and:

- / Shall permit intensification such that the average area density generally meets or exceeds the applicable density targets;
- / May determine different maximum built form permissions, and minimum density requirements where applicable, as appropriate to lot fabric, neighbourhood context, servicing and proximity to Hubs, Mainstreets, Minor Corridors, rapid-transit stations and major neighbourhood amenities;
- / May establish a minimum floor area for large dwellings; and
- / May establish an alternate large dwelling proportion for denser buildings, for example buildings with requirements for elevators.

The proposed development has a density of approximately 609 units per net hectare which will support the City's growth management targets. The City has not yet initiated any process to implement the intensification or overall growth targets into the Zoning By-law.

3.1.3 Urban Design

Urban Design concerns the design of both the built form and the public realm. Urban design plays an important role in supporting the City's objectives such as building healthy 15-minute neighbourhoods, growing the urban tree canopy and

developing resilience to climate change. New development should be designed to make healthier, more environmentally sustainable living accessible for people of all ages, genders and social statuses.

Section 4.6 of the Official Plan contemplates an urban design framework to outline the City's urban design program. The subject property is not located within a Design Priority Area on Schedule C7A of the new Official Plan and therefore is not subject to further review by the City's Urban Design Review Panel.

Policy 4.6.5.3 encourages designs to minimize the potential for conflict between vehicles and pedestrians and to improve the attractiveness of the public realm by internalizing all servicing, loading areas, mechanical equipment and utilities into the design of the building, and by accommodating space on the site for trees, where possible.

The proposed development has limited site access points to as to reduce the potential for conflicts with the pedestrian realm. Access to Bronson will be for the underground parking garage only while the access to and from Cambridge Street South will serve as an out-only from the parking garage, while also providing access for loading and servicing the proposed development. These service areas are screened from view at the street with landscaping and have been integrated into the ground floor of the building.

Policy 4.6.6 contains policies related to enabling the sensitive integration of new development into existing neighbourhoods. Policy 4.6.6.1 states that, to minimize impacts on neighbouring properties and on the public realm, transition in building heights shall be designed in accordance with applicable design guidelines.

Policy 4.6.6.2 states that transition between mid and high-rise buildings and adjacent properties designated as neighbourhood will be achieved by providing a gradual change in height and massing, through the stepping down of buildings, setbacks, and generally be guided by the application of an angular plane as may be set out by the Zoning By-law or Council-approved Plans or design guidelines.

Where two or more high-rise buildings exist within the immediate context, new high-rise buildings should relate to the surrounding buildings and provide for variation in building heights, per policy 4.6.6.3.

As discussed in the previous Planning Rationale, the proposed development provides a good transition to the neighbourhood to the southwest and to the future planned context to the west along Carling Avenue and south along Bronson Avenue. The proposed tower has been positioned in the northeast corner of the site, with significant setbacks from the low-rise community to the west and the future mid-rise development to the south. The podium of the tower steps down from nine (9) to four (4) storeys along the public street frontages to provide additional transition.

Policy 4.6.6.4 states that amenity areas shall be provided within residential development to serve the needs of all age groups, and in consideration of all seasons.

The proposed development includes 1,554 square metres of amenity area throughout the two (2) phases of development including a mix of common interior and exterior spaces, as well as private terraces and balconies. Collectively, the amenities within the proposed development will serve the needs of all ages throughout the year.

Per 4.6.6.7, mid-rise buildings shall be designed to respond to the context, and transect area policies, and should;

- / Frame the street and provide mid-block connections to break up large blocks;
- / Include a base with active frontages, and a middle that relates to the scale and character of the surrounding buildings or planned context;
- / Be generally proportionate in height to the width of the right-of-way; and,
- / Provide sufficient setbacks and stepbacks to:
 - Provide landscaping and adequate space for tree planting;
 - Avoid a street canyon effect; and,

- Minimize microclimate impacts on the public realm and private amenity areas.

The proposed nine (9) storey podium along Bronson Avenue has been articulated to break up the block through variation in materials, and features active ground floor uses along the Bronson and Carling frontages. Street trees are proposed along the Bronson Avenue frontage and the built form will avoid microclimate impacts on the street edges. The phase 2 mid-rise building steps down to four (4) storeys along Cambridge Street South and frames the street edge with a residential entry point and greenspace along the street edge. The ground floor facing south features at-grade units with private terraces and landscaping to provide a buffer to the south.

Per 4.6.6.8, high-rise buildings shall be designed to respond to context and transect area policies, and should be composed of a well-defined base, middle and top. Floorplate sizes should generally be limited to 750 square metres for residential buildings and 2,000 square metres for commercial buildings with larger floorplates permitted with increased separation distances. Space at-grade should be provided for soft landscaping and trees.

Per 4.6.6.9, separation distance between high-rise towers should be provided to ensure privacy, light, and sky views for residents. Generally, a separation of 23 metres is preferred, though lesser separation distance may be permitted in accordance with Council approved design guidelines. Where the planned context would allow for high-rise buildings, development proposals should demonstrate and consider this.

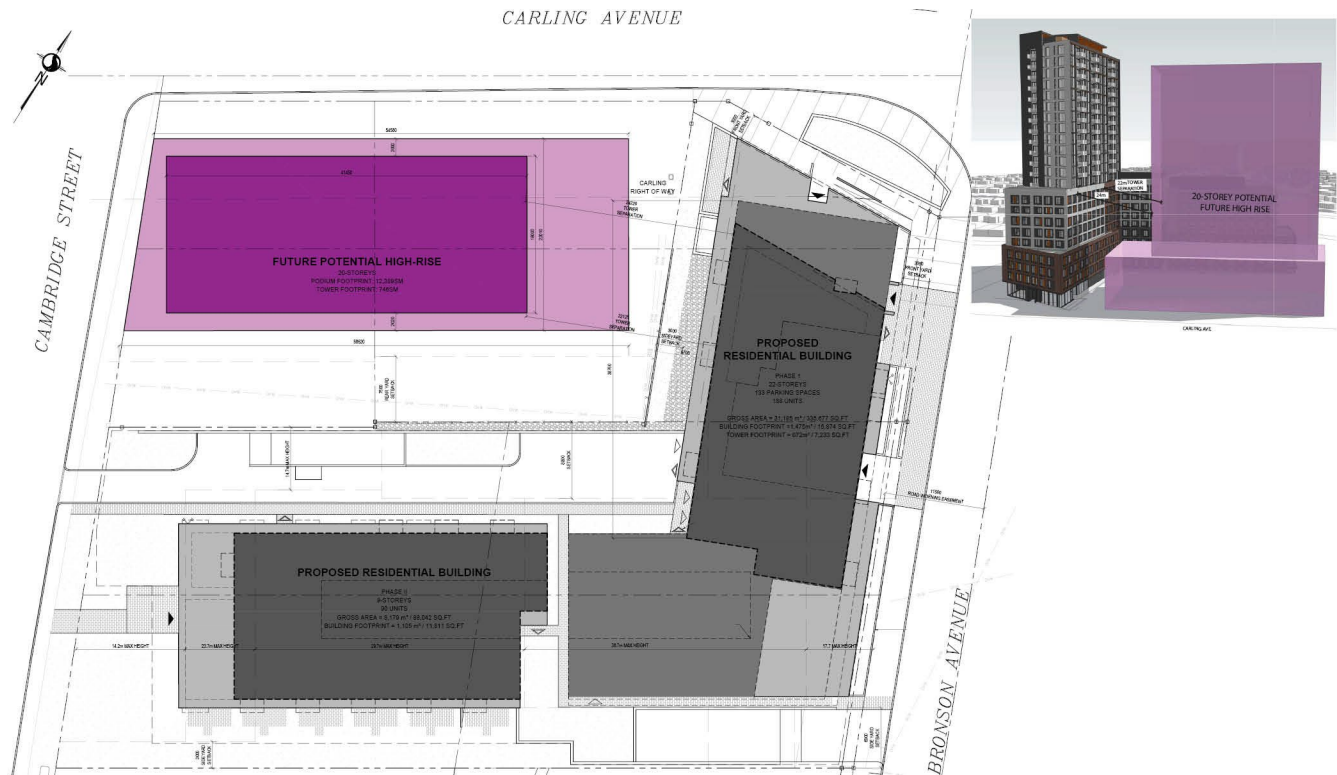


Figure 2: High-Rise Feasibility Study for 270 & 280 Carling Avenue

The proposed high-rise building has a floorplate of 672 square metres and provides 8.2 metres of separation to the adjacent property at 270 Carling Avenue. The viability of a high-rise on the properties at 270 and 280 Carling Avenue has been assessed through a study. The study has determined that, per the City's High-Rise Zoning requirements and Urban Design Guidelines for High-Rise Buildings, the properties would need to be consolidated to be developed with a high-rise building.

The reduced separation 8.2 metres rather than the 10 metres required by the Zoning By-law and 11.5 metres encouraged by the urban design guidelines is appropriate in this context given the offset of the future towers and the anticipated location of a high-rise on the adjacent property.

With regards to offset, the proposed tower and a future tower would only overlap for roughly 20% of the building facade. The reduced separation would still allow for a future building to be development on the consolidated properties with a floorplate of approximately 750 square metres, and appropriate setbacks from the adjacent streets, and a separation over 20 metres from the proposed tower. As a result, the reduced separation is, in our opinion, appropriate in this context.

The proposed development conforms to the 2022 Official Plan.

3.2 City of Ottawa Zoning By-law

The subject property is currently split-zoned with 770 Bronson zoned “Arterial Mainstreet, Subzone 10, Urban Exception 2373 (AM10[2373])” and 774 Bronson and 557 Cambridge Street South zoned “Arterial Mainstreet, Subzone 1, Urban Exception 2003, Schedule 296 (AM1[2003] S296)” in the City of Ottawa’s Comprehensive Zoning By-law (2008-250).

As the site is now proposed to be redeveloped as a single parcel, a Zoning By-law Amendment is proposed to standardize the zoning requirement for both parcels and establish a new site-specific zoning exception and schedule for the proposed development. The proposed development is compared to the AM10 zone in the table below, with areas of non-compliance shaded:

AM10 Zone Requirements	Required	Proposed
Minimum Lot Area	No minimum	4,563m ²
Minimum Lot Width	No minimum	64.02m
Setbacks	Front (Carling/Bronson): No minimum; Maximum 3m Corner Side (Cambridge): No minimum; Maximum 3m Rear (south): Abutting a residential zone: 3m within 20m of a public street; then 7.5m Other cases: No minimum Interior Side (abutting 270/280 Carling): No minimum	Front: 3m Corner Side: 9.6m Interior Side: 4.6m Rear: 6.9m
Minimum Building Height	Within 10m of Carling/Bronson: 4.5m ground floor; 7.5m/2 storeys total height	4.7m ground floor height; 14m overall height
Maximum Building Height	770 Bronson: 30m/9 storeys 774 Bronson/557 Cambridge: Per Schedule 296	Tower: 71m
Maximum Floor Space Index	770 Bronson: No maximum 774 Bronson/557 Cambridge: 3.0	7.2
Entrance Requirement	The ground floor facade facing a public street of a building located within 4.5 metres of the	Active entrance to the retail space is provided from Carling and Bronson

AM10 Zone Requirements	Required	Proposed
	front lot line or corner side lot line must include: <ul style="list-style-type: none"> - A minimum of one active entrance from each individual occupancy located immediately adjacent to the front lot line or corner side lot line in the case of non-residential uses; - A minimum of one active entrance in the case of a residential use building; 	Residential entry is provided from Bronson
Ground Floor Glazing	A minimum of 50% of the surface area of the ground floor façade, measured from the average grade up to a height of 4.5 metres, facing a public street must be comprised of transparent glazing and active customer or resident entrance access doors	Along Bronson Ave.: >50% Along Carling Ave.: >50%
Amenity Area 6m ² per unit; minimum 50% communal	Communal: 834m ² Total: 1,668m ²	Total: 1,864 ² Communal: 1,069m ²
Minimum Vehicular Parking Area X on Schedule 1A Resident: 0.5/unit, after first 12 units* Visitor: 0.1/unit, after first 12 units* Retail: 1.25/100m ² GFA Restaurant, Fast Food: 5 per 100m ² GFA 10% reduction for below-grade parking *Exception 2003 requires only 0.1 spaces/unit for residential and 0.12 spaces/unit for visitor parking	Resident: 120 spaces Visitor: 27 spaces Retail: 27 spaces	Resident: 106 spaces Visitor: 27 spaces Retail: 0 spaces Total: 133 spaces
Location of Parking	Minimum 50% of visitor parking must be at-grade (per exception 2003)	All parking located below-grade
Driveway Width	Single traffic: 3m, maximum 6.7m Double traffic: 6m; maximum 6.7m	Single traffic: 3.6m Double traffic: 3.6m
Drive Aisle Width	Within a parking garage: 6m	6m
Parking Space Provisions	2.6-3.1m wide 5.2m long Up to 50% may be small car spaces that are 2.4m wide by 4.6m long	2.6m by 5.2m 2.25% small car spaces
Minimum Bicycle Parking 0.5/unit Minimum 50% horizontal at floor level Minimum 25% interior spaces	0.5/unit * 278 units = 139 spaces	221 spaces >50% horizontal at floor level
Bicycle Parking Dimensions	Horizontal: 0.6 m wide x 1.8 m long Stacked: 0.37m wide x 1.8m long Vertical: 0.6 m wide x 1.5 m long	0.6m x 1.8m

AM10 Zone Requirements	Required	Proposed
Bicycle Parking Aisle Width	1.5m	Front of parking spaces: 0m Within bike storage areas: 1.5m
Loading	0 spaces for < 2,000m ² non-residential GFA	None.
High-Rise – Minimum Lot Area	1,350m ²	4,563m ²
Defined Tower	That portion of a building over 9 storeys or a height equal to the width of the widest public street abutting a lot line, whichever is less	Anything above 23m
Minimum Interior Side and Rear Yard Setbacks for a Tower	10m	8.2m

The proposed amendments to the Zoning By-law will be addressed through the proposed site-specific exception and zoning schedule for the subject property. Rationale for the amendments is provided in the July 2021 Planning Rationale.

4.0 Conclusions

After review, it is Fotenn's opinion that the proposed development conforms to the policies of the 2022 Official Plan. The proposed development will redevelop and intensify an underutilized property within the built-up area, adjacent to planned rapid transit and in proximity to existing multi-use pathways, services, and amenities. The proposed density will support the City's targets for intensification. The mixed-use development will prioritize active modes of transportation, frame the street and make positive contributions to the public realm.

The proposed amendments to the Zoning By-law are appropriate in Fotenn's opinion and will facilitate the redevelopment of the lands.

As stated throughout, while this review of the new Official Plan has been provided, it remains Fotenn's opinion that, given the timing of the applications, the proposed development should be required to conform to the policies of the 2003 Official Plan while having regard to the policies of the 2022 Official Plan.

A handwritten signature in black ink, appearing to read 'Paul Black', written in a cursive style.

Paul Black, MCIP RPP
Associate