Barrie

STAFF REPORT PLN025-17

September 11, 2017

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TO: GENERAL COMMITTEE

SUBJECT: APPLICATIONS FOR OFFICIAL PLAN AMENDMENT AND ZONING

BY-LAW AMENDMENT – 37 JOHNSON STREET

WARD: WARD 1

PREPARED BY AND KEY

C. TERRY, MCIP, RPP

CONTACT:

PLANNER, EXTENSION #4430

SUBMITTED BY: A. BOURRIE, RPP

DIRECTOR OF PLANNING & BUILDING SERVICES

GENERAL MANAGER

R. FORWARD, MBA, M.Sc., P. ENG.

APPROVAL:

GENERAL MANAGER OF INFRASTRUCTURE AND GROWTH

MANAGEMENT

CHIEF ADMINISTRATIVE

OFFICER APPROVAL:

M. PROWSE, CHIEF ADMINISTRATIVE OFFICER

RECOMMENDED MOTION

- 1. That the Official Plan Amendment application submitted by MHBC Planning on behalf of Starlight Investments for lands municipally known as 37 Johnson Street, to permit a density of 290 units per hectare outside of the City Centre be approved as an amendment to policy section 4.8 Defined Policy Areas and shown in Appendix "A" to Staff Report PLN025-17. (D09-OPA062)
- 2. That the Zoning By-law Amendment application submitted by MHBC Planning on behalf of Starlight Investments for lands municipally known as 37 Johnson Street, be approved as recommended for revision by staff, to change the zone from Residential Apartment First Density (RA1-3) to Residential Apartment Second Density with Special Provisions (RA2-1)(SP) (as shown in Appendix "B" to Staff Report PLN025-17) including:
 - a) A reduced front yard setback from 7 metres to 5 metres;
 - b) A reduced setback for secondary means of egress from 7 metres to 5 metres;
 - c) An increase in gross floor area from 200 percent to 206 percent:
 - d) An increase in building height from 30 metres to 34 metres;
 - e) A decrease in parking ratio from 1.5 spaces per unit to 1 space per unit;
 - f) A reduced side and rear landscape buffer for the parking lot from 3 metres to 1 metre; and
 - g) An increase in surface parking lot coverage from 35 percent to 44 percent.
- 3. That the written and oral submissions received relating to this application, have been on balance taken in consideration as part of the deliberations and final decision related to the approval of the application, including but not limited to the increase in density and traffic; availability of infrastructure; source water protection; previous planning applications and impact on the community.

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4. That no further public notice is required in accordance with Section 34 (17) of the *Planning Act.*

PURPOSE & BACKGROUND

Report Overview

- 5. The purpose of this staff report is to recommend that the property municipally known as 37 Johnson Street be permitted a maximum density of 290 residential units per hectare and be rezoned from Residential Apartment First Density (RA1-3) to Residential Apartment Second Density with Special Provisions (RA2-1)(SP) to reflect the existing and proposed apartment buildings at this location.
- 6. Staff have done a complete analysis of the supporting documentation provided by the applicant and conclude that an additional apartment building on this site meets the City's locational criteria for intensification. A second apartment building on this site does not introduce a new built form into the neighbourhood, is accessible by transit, is directly adjacent a public park, and is in close proximity to schools and commercial uses including a grocery store. When assessed against all relevant policy, the proposal represents an appropriate form of development.

Location

7. The property municipally known as 37 Johnson Street is located south of Blake Street adjacent Shoreview Park in the North Shore Planning Area. An 11 storey 192 unit apartment building currently exists on site with the balance of the property vacant.

Surrounding Land Uses

8. Existing land uses surrounding subject property consist of the following:

North

Indian Arrow Road, an apartment complex targeted for seniors and single detached homes.

East

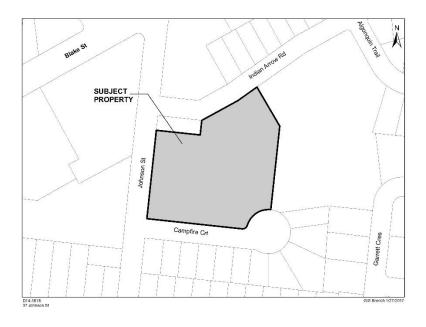
Shoreview Park, single detached homes

South

Campfire Court, single detached homes

West

Johnson Street, an apartment complex targeted for seniors and a commercial plaza



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Background

- 9. The existing 11 storey residential apartment building was built on this site in 1973. The City has considered a similar application for a second apartment building on this site through a request to re-zone the subject lands to Residential Apartment Second Density (RA2). The application was denied by Council in 2002.
- Since submission of the previous application, staff has completed a detailed analysis of intensification policy with the specific view of implementing these policies for the City of Barrie. The policies expressed in the Intensification Study (2009) have been incorporated into the Official Plan including but not limited to locational criteria to provide guidance when evaluating infill intensification projects outside of the areas of focus (UGC, Nodes & Corridors) identified on Schedule I: Intensification of the Official Plan. This site does meet all of the locational criteria for an infill intensification project outside of designated nodes and corridors and therefore meets the intent of the City's intensification policies.

Supporting Information

- 11. In support of the subject application, the following documents were submitted:
 - a) Planning Justification Report (MHBC Planning, December 2016)
 - b) Urban Design Brief (MHBC Planning, December 2016)
 - c) Supplementary Submissions (MHBC Planning):
 - i) Response to Comments from Staff and the Public (May 26, 2017)
 - ii) Urban Design and Tall Buildings Guidelines Policy Response (April 12, 2017)
 - iii) Affordable Housing Policy Response (April 12, 2017)
 - d) Plans and Details (Architecture Unfolded):
 - i) A101: Site Plan, Context Plan & Statistics (revised June 28, 2017)
 - ii) A401-A405: Elevations & Rendering (revised July 11, 2017)
 - iii) A406: Shadow Study (December 9, 2016)
 - iv) TI-1: Tree Inventory, Protection and Removals Plan (November 15, 2016)
 - v) L-1: Landscape Concept (November 22, 2016)
 - e) Functional Servicing Report (WMI & Associates, November 2016)
 - f) Transportation Considerations Report (BA Group, December 2016)
 - i) Update July 27, 2017 regarding Parking
 - g) Geotechnical Investigation (exp Services Inc., December 2016)



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Public Consultation

- 12. A Neighbourhood Meeting was held on February 22, 2017. The Neighbourhood Meeting included a presentation by the owner/applicant and the opportunity for discussion and comment from the public. There were approximately 70 residents in attendance. A range of issues were discussed with the group, including but not limited to increased density, traffic and parking, municipal infrastructure, construction and Planning Act application processes.
- 13. The Public Meeting for these applications was held on April 24, 2017. The meeting was well attended by the public, and comments were received verbally, via letter, e-mail and petition. Comments expressed by the public at General Committee were generally not in favour of the proposal and raised issues including but not limited to: impact on the existing neighbourhood; overuse of the site; increased traffic and on-street parking; shadow impacts; emergency service access; municipal infrastructure and maintenance of the existing building.
- 14. A summary of the key issues is further outlined in the Analysis section of this report with associated comments from staff in response to the concerns raised at the Public Meeting and through the correspondence received by the City throughout the review of the subject applications.

ANALYSIS

Provincial Policy

- 15. The Provincial Policy Statement promotes the integration of new development within existing builtup areas, with compact form in a mix of uses and densities that promote intensification and redevelopment that meets the City's projected population growth. Places to Grow: Growth Plan for the Greater Golder Horseshoe (The Growth Plan) also provides direction for municipalities to incorporate intensification into existing built-up areas in an effort to promote building complete communities.
- 16. The City has incorporated the structure of the stated provincial policy directives into the Official Plan, more specially referencing the importance of efficiently using our land and resources by integrating population into areas that use existing services, roads and infrastructure and are transit accessible. Provincial policy direction and the City's Official Plan have been reviewed in detail as further expressed in the following sections. Staff consider the addition of a second building at this location to meet the intent of the provincial policy direction to effectively incorporate intensification into built-up areas.

Official Plan Conformity

17. The subject lands are designated Residential in the City's Official Plan. Residential lands are intended to provide a variety of housing types and tenure options. Official Plan Policy 4.2.2.3 (c) states that "High density development in excess of 150 units per hectare shall be restricted to locations within the City Centre unless an amendment considering the (locational) criteria...and other relevant policies of this Plan has been approved." With the exception of policy 4.2.2.3 (c), there are no maximum densities associated with high density residential development in the City's Official Plan.



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- 18. The application under consideration by the City is to amend the Official Plan on a site specific basis to allow for a second apartment building at 37 Johnson Street with an overall site density of 290 units per hectare. Official Plan policy 4.2.2.3 (b) provides locational criteria for considering infill intensification opportunities, specifically medium and high density residential development outside of a designated Intensification Area as shown in Schedule I. The criteria state that intensification should be:
 - a) Adjacent to arterial and collector roads;
 - b) In close proximity to public transit, and facilities such as schools, parks, accessible commercial development; and
 - c) Where planned services and facilities such as roads, sewers and watermains, or other municipal services are adequate.
- 19. As noted previously in this report, the subject lands can meet the locational criteria for intensification stated in policy 4.2.2.3 (b).
 - a) The property has frontage on Johnson Street, a minor collector road capable of supporting the additional traffic created by a second building without service upgrades;
 - b) The property is directly adjacent Shoreview Park and is in close proximity to transit, schools, commercial uses, and additional City amenities including Johnson Beach and the North Shore Trail; and
 - c) The addition of a second building at this location will not require capital expenditures as the intent is to use existing municipal infrastructure to service this development.
- 20. In addition to the locational criteria outlined above, staff have evaluated the full policy context for considering residential intensification outside of the Intensification Areas, including but not limited to policy 4.2.2.6 (d) which requires the proponent to demonstrate:
 - a) That the scale and physical character of the proposed development is compatible with, and can be integrated into, the surrounding neighbourhood;
 - b) That infrastructure, transportation facilities, and community facilities and services are available without significantly impacting the operation and capacity of existing systems;
 - c) That public transit is available and accessible;
 - d) That the development will not detract from the City's ability to achieve increased densities in areas where intensification is being focussed;
 - e) That sensitive, high quality urban design will be incorporated into the development including the efficiency and safety of that environment; and
 - f) That consideration is given to the preservation of heritage resources.
- 21. Staff have completed a detailed review of the documentation provided by the owner/applicant in support of the project, and agree that an additional apartment building at this location is well supported as an infill intensification project in accordance with policy 4.2.2.6 (d) summarized below:
 - a) The project is not a new type of built-form and is located on a site that is generally separated from the neighbourhood by the road network and a public park;

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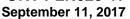
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- b) Municipal roads and service infrastructure are available to service this development, service capacity to be confirmed through detailed design at the time of Site Plan Control;
- c) Public transit is available and accessible;
- d) The City is working diligently to promote and achieve the increased densities intended to be reached in the Urban Growth Centre (UGC) and the identified Intensification Nodes and Corridors, however the target densities for these areas are not currently being met. All infill intensification opportunities should also be considered to promote a complete community and meet the targets identified for the City.
- e) Through the Site Plan Control Process, elements of design such as pedestrian accessibility, bike racks, electric vehicle charging stations and Low Impact Development for stormwater management are being considered, in addition to promoting high quality urban design which includes stepping provisions in the building form, materials and streetscape interaction; and
- f) No heritage resources are documented on this site.
- 22. It is also noted in policy 4.2.2.6: Intensification Policies that: "Applications that propose higher density than existing conditions will not be treated favourably simply because they satisfy the definition of 'intensification' and contribute towards the City achieving its intensification and density targets." Staff have not recommended approval for this project based solely on the need to promote intensification targets. The applications have been considered based on Official Plan policy including but not limited to the sections noted above, section 3.3: Housing and section 4.2: Residential of the Official Plan as well as overall good planning principles.
- 23. The Official Plan policy does provide for consideration for lifting the density restriction of 150 units per hectare if criteria are met and supported through the application process. It is the opinion of staff that the Official Plan Amendment required to consider a higher density at this location is well supported through a detailed policy review and will result in a more effective use of an existing high-density site. Locational and servicing constraints such as shadow effect and traffic/intersection service levels have not been identified as concerns for this proposal. Intensification does represent an essential component of the City's growth management strategy to minimize infrastructure requirements of new development and to utilize existing facilities and services such as transit, schools and open space. Where planning policy and locational criteria can be met and potential impacts avoided or minimized, good planning principles come into focus.

Affordable Housing

- 24. Official Plan policy section 3.3.2.2 speaks to the goals and objectives for the provision of affordable housing in the City in accordance with Provincial Policy. The goal for the City is to achieve 10% of all new housing units per year as affordable in accordance with the criteria further outlined in the policy for rental housing as:
 - a) A unit for which rent does not exceed 30% of gross annual household income for low and moderate income households; or
 - b) A unit for which rent is at or below the average market rent of a unit in the regional market area.



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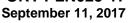
The owner/applicant has provided detail on the existing building as part of the support for meeting the general intent of the City's goal to provide affordable housing options for residents. The rental rates for the existing building equate to almost 25% of the units being at or below market rent, which would contribute to the complex meeting the affordable housing target as a whole. Although this does not fully meet the objective of providing new affordable housing, it should be recognized that the type and tenure of the proposed units, as 1 and 2 bedroom rental apartments, is providing a more affordable and much needed option for housing in the City. Staff are satisfied that the City's goal and objective for providing more affordable housing is being met by the development of a second apartment building on this existing site.

Zoning Rationale

- 25. Staff have recommended that the base zoning for the property be changed from the Residential Apartment First Density zone (RA1-3) to the Residential Apartment Second Density zone (RA2-1) to better reflect the requested change in the zoning standards for Gross Floor Area. With the exception of Gross Floor Area (GFA), the RA1-3 and RA2-1 zones are generally consistent, including but not limited to the height permission of 30 metres.
- 26. The standards for GFA in the RA1-3 zone is 100% whereas the RA2-1 zone permits 200% GFA and the owner/applicant has requested a GFA of 206% to accommodate the proposed development. Additional minor variations to the zoning standards have also been requested to accommodate this proposal, including:
 - a) A reduced front yard setback from 7metres to 5 metres;
 - b) A reduced setback for secondary means of egress from 7 metres to 5 metres;
 - c) An increase in gross floor area from 200 percent to 206 percent;
 - d) An increase in building height from 30 metres to 34 metres;
 - e) A decrease in parking ratio from 1.5 spaces per unit to 1 space per unit;
 - f) A reduced side and rear landscape buffer for the parking lot from 3 metres to 1 metre and
 - g) An increase in surface parking lot coverage from 35 percent to 44 percent.
- 27. Staff considered the requested modifications to the standards of the Zoning By-law for the RA2-1 zone to be relatively minor in nature and do not impact the intent of the Zoning By-law or the existing use of the property as a high-density residential development. The original application submitted by the owner/applicant was to request a more significant change to the standards of the RA1-3 zone to meet the needs of this project, however have agreed with the assessment of staff that the overall change in zone to RA2-1 does better reflect the end use of the property if this increased density is approved. The proposed zoning is also relatively consistent with the existing apartment building on site.

Site Plan Control

- 28. Any development on the subject lands would be subject to the Site Plan Control process. Some specific elements of site design that will be considered if the project moves forward include:
 - a) Building elevations and overall site design;
 - b) Provision of municipal services and stormwater management;



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- c) Pedestrian movement and accessibility;
- d) Emergency access and fire route;
- e) Landscaping and edge management; and
- f) Waste collection and snow storage.
- 29. Staff acknowledge that preliminary efforts have been made by the owner/applicant to improve the relationship between the existing and proposed new building, such as stepping provisions, orientation of the building, and the location of windows and balconies to improve line of sight. The proposed site plan and concept elevations are included as Appendix "C" to this staff report for reference purposes. As noted above, if the Official Plan and Zoning By-law Amendments are approved, the new development would be subject to detailed review through the Site Plan process.

Public Consultation

30. Staff have reviewed the correspondence and have coordinated and participated in the public consultation process for the subject Official Plan Amendment and Zoning By-law Amendment applications. It should be noted that staff did express some of the same key concerns identified by the public, which have subsequently been discussed with the owner/applicant and additional submissions from the owner/applicant have allowed staff's concerns to be addressed to the point of support. The following is a summary of the key issues raised through the public consultation process with associated comments from staff:

a) Planning Act Applications

Residents expressed concern that the City accepted and was considering the subject applications, with specific reference to an application that was previously submitted and denied by Council.

The City is obligated to accept and review any complete application submitted under the Planning Act. The owner/applicant did follow the appropriate process and provided all supporting documentation required for staff to provide an analysis of the project and subsequently a recommendation for Council based on current policy and the direction for future growth of the City. The Province's policy with regard to intensification has changed since the 2002 application denied by Council. As such, the City's policy framework has also changed. These applications must be addressed under the current policies.

b) <u>Density and Preservation of the Neighbourhood</u>

Residents expressed concern with the increase in density at this location and the impacts on the surrounding lower density neighbourhood.

As expressed previously in this report, with the exception of the policy under review through this application directing densities higher than 150 units per hectare to the City Centre, there are no maximum density provisions associated with high-density development in the Official Plan or Zoning By-law. Density greater than 150 units per hectare for an apartment building outside the City Centre has been considered and approved by the City. Staff have considered the implications of the development of a second apartment building at this location regarding neighbourhood character. The proposed building does not introduce a new type of built form into this area and the creation of a complex at the existing location will more effectively utilize the lands currently identified for an apartment building. While many high density proposals can have problems meeting traditional criteria such as



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shadow, transit service level and stormwater management, this proposal does not have any concerns expressed from the City's technical staff.

c) Traffic, Parking Ratio and On-Street Parking

Residents expressed concern that the development would create an increase in traffic, that the reduction in parking cause overflow parking onto municipal streets, and that on-street parking issues already exist from the seasonal use of Johnson's Beach.

In support of the application, a Transportation Considerations Report and Update have been submitted and reviewed by staff in Traffic Services and Planning. The results of the traffic analysis have indicated that the potential increase in traffic can be easily accommodated on the existing road network and that an additional access to the site is not required. Staff did request an update to the parking analysis section of the report to reference additional comparable parking situations. This update was submitted and has been reviewed by staff. The report does provide appropriate support for the requested parking ratio of 1 space per apartment unit. There are currently no restrictions for on-street parking in this general area. The City's technical staff have no concerns with traffic impacts.

d) Municipal Services and Stormwater Management

Residents have expressed concern that the development would place a strain on municipal services and create or worsen stormwater runoff from the site.

In support of the application, a Functional Servicing Report was submitted and reviewed by staff. The report has identified that the existing services and infrastructure are available to support the addition of a second building at this location. It should be noted however, that detailed design and engineering is not completed at this stage in the development process. Through the detailed design of the site, the owner/applicant will be required to ensure all standards can be met to fully service the proposed development to the satisfaction of staff. If any improvements and/or service capacity upgrades are needed, it would be the responsibility of the owner/developer. It is anticipated efforts will also be made to implement Low Impact Development techniques for managing stormwater for this project. Staff are satisfied at this time that the development is appropriate.

e) Source Water Protection – Wellhead Protection Area

Correspondence was received and verbally shared at the Public Meeting citing concern with the location of this site in a Wellhead protection area with a high Aquifer Vulnerability Index (AVI).

Staff have reviewed the information submitted by the resident and have confirmed with the Lake Simcoe Region Consideration Authority (LSRCA) that the site has an AVI of 2, which is considered low. The property is identified as an area that should be screened by the Risk Management Official (RMO) due to the proximity of the site to a Wellhead Protection Area as shown in Official Plan Schedule G: Drinking Water System Vulnerable Areas. This review was completed and no concerns were identified by the RMO. In addition, since the time of preparing the original comments for this proposal, updated mapping has been generated for the City's Wellhead Protection Areas that would remove this site from the required screening area for Source Water Protection.

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f) Height and Building Separation

Residents expressed concern that the height of the proposed building, disruption in sight lines for existing residents and the relationship between the existing and proposed apartment building on this site.

The current RA1-3 zone and the corresponding RA2-1 zone being recommended by staff, have an identified height of 30m. The applications before Council for consideration request an increase in height to 34 metres. Staff consider the request for an additional 4 metres to be minor as it is required to accommodate the change in grade on site and architectural detail. Staff raised a similar concern with the relationship between the two buildings. The proposed concept attached to Staff Report PLN025-17 as part of Appendix "C" has reflected a revised building design that incorporates stepping provisions in proximity to the adjacent single detached residence (57 Johnson Street) and the existing building, as well as improvements to the sight lines and interaction between the existing and new units. This built form revision reflects appropriate mitigation for this concern.

g) Shadow Impacts

Residents expressed concern that the building will cast shadow on the surrounding neighbourhood and adjacent Shoreview Park.

As part of a complete application, the owner/applicant did submit a Shadow Study to demonstrate that there would be minimal impact of shadow from the new building. In addition, comments were provided through the concept plan review that identified the shape and orientation of the building were considered to limit the impacts of shadow and nuisance from the new building on the existing building and surrounding properties. In specific regard to Shoreview Park, staff have provided comment that the shadow impacts on the park would not impact the active play area, and would not appear to have a significant impact on the wooded area directly adjacent to this property.

h) Detailed Design - Site Plan Control

Residents expressed concern with the general maintenance of the exiting site, and how certain aspects of the design would be accommodated with the new building, such as emergency vehicle access, parking, pedestrian accessibility, landscaping, waste collection and snow storage.

If approved, the development is subject to the Site Plan Control process. Staff will require the applicant to comply with City standards, and further integrate all of the detailed elements of design for the site including but not limited to the items listed above. The Site Plan process is also an opportunity to make improvements and updates to the entire property to create an integrated complex for the two buildings.

i) <u>Construction</u>

Residents expressed concern with the impact the future construction of the building will have on the existing community, including but not limited to noise, dust and parking of construction vehicles.

Staff appreciate, that if approved, development in an existing built-up area can be challenging and inconvenient for residents. As part of the Site Plan process, the

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owner/applicant has agreed to negotiate a construction management plan to ensure steps are taken to reduce the impact on the existing community where possible.

31. As summarized above, staff have considered the written and oral submissions received for this application, and have, on balance taken these issues into consideration as part of the deliberations and recommendation for approval of the subject applications.

BONUSING (DENSITY & HEIGHT)

32. In accordance with the Section 37 of the Planning Act, this project can be required to supply community benefits through Bonusing for the addition of density and height proposed for this project. Staff have circulated the Bonusing Committee to discuss community benefit options for the uplift value for this project if approved. At the time of writing this report, the details of the meeting were not available. Correspondence will be provided to Council under separate cover.

ENVIRONMENTAL MATTERS

33. There are no environmental matters related to the recommendation.

ALTERNATIVES

34. The following alternatives are available for consideration by General Committee:

Alternative #1

General Committee could maintain the density limits for this site at 150 units per hectare and deny the change in zoning from Residential Apartment First Density (RA1-3) to Residential Apartment Second Density with Special Provisions (RA2-1)(SP) to reflect the opportunity for an additional apartment building on site. (i.e. Status Quo)

This alternative is not recommended as the proposed development of a second apartment building on this site satisfies the locational criteria for Intensification in the Official Plan and will offer a choice of housing form and tenure that is much needed in the City. The second building is an infill opportunity that does not introduce a new housing form into an existing community. Good planning principles have been applied and the proposal reflects both Provincial and City policy intent. Should the applicant appeal Council decision with this alternative, City Planning staff will not be in a position to offer supporting evidence.

Alternative #2

General Committee could alter the proposed recommendation by suggesting a reduced density or built-form, or sending it back to staff for additional consultation with the owner/applicant and the public.

Although this alternative is available, a Neighbourhood Meeting and Public Meeting have been formally held, as well staff have been available for discussion and have received numerous comments from the public. It is not anticipated that additional consultation would result in alterations to the application that would make the proposal more acceptable to the neighbourhood residents. As noted in the recommendation, staff are satisfied that the supporting documentation submitted by the owner/applicant, including updates as requested, justifies consideration of a second apartment building on this site.

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FINANCIAL

35. If the development process proceeds for a second building at this location, the municipal taxes will generally double as taxes are based on per unit counts. Development charge revenue for Education would be at a rate of \$1759.00 per unit for a total of \$378,185.00 for 215 units. The current rate for Parkland cash-in-lieu is \$5000.00 per unit for high density development for a total of \$1,075,000.00. The cost estimates for building permit and development would be formalized at the time of detailed design submission through the Site Plan Control Process.

LINKAGE TO 2014-2018 STRATEGIC PLAN

- 36. The recommendation(s) included in this Staff Report support the following goals identified in the 2014-2018 Strategic Plan:
- 37. If approved, this infill development is an opportunity to efficiently use the City's land and resources by integrating population into an area with existing infrastructure, transit and amenities. The development of a second apartment building at this location will contribute to a more affordable variety of housing options, including rental tenure, in an existing neighbourhood without introducing a new type of built form.

Appendix "A" Proposed Official Plan Amendment – Defined Policy Area
Appendix "B" Proposed Zoning By-law Amendment – Map Schedule
Appendix "C" Development Concept

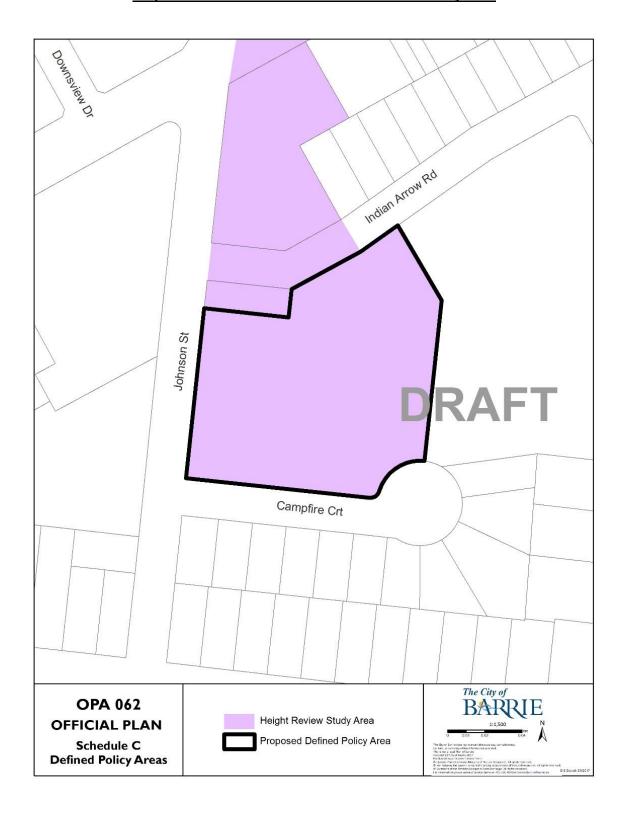
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APPENDIX "A"

Proposed Official Plan Amendment - Defined Policy Area



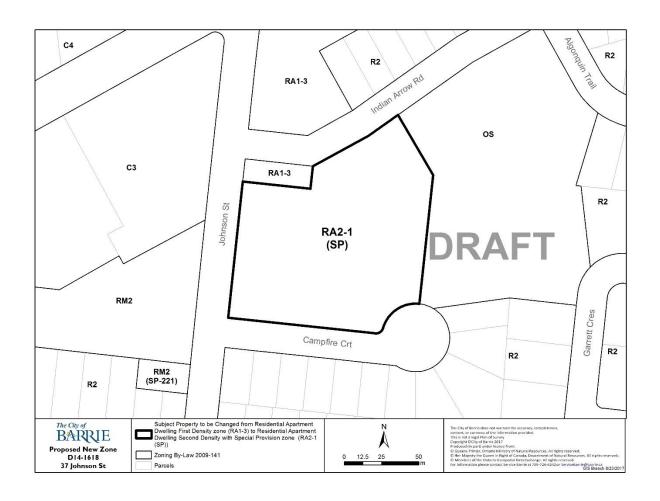
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APPENDIX "B"

Proposed Zoning By-law Amendment - Map Schedule





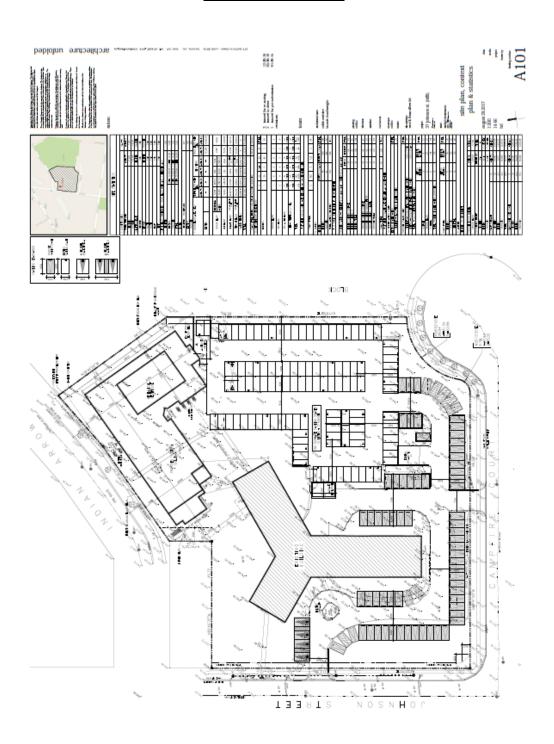
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APPENDIX "C"

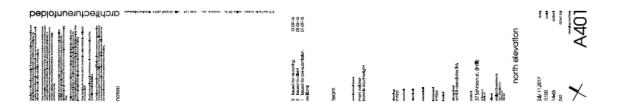
Development Concept

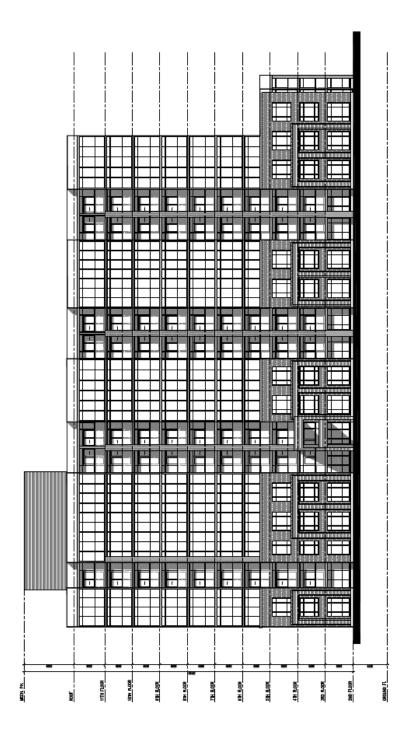




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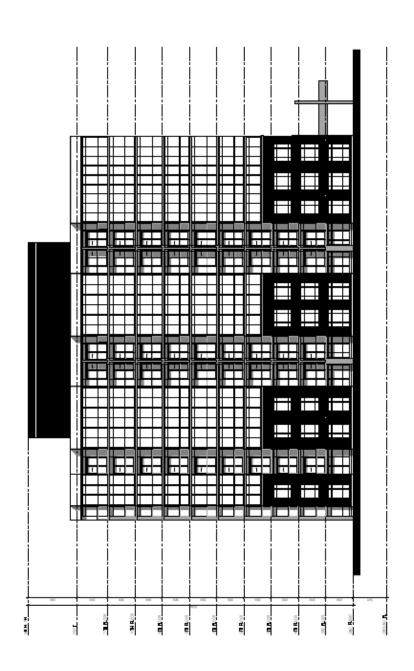


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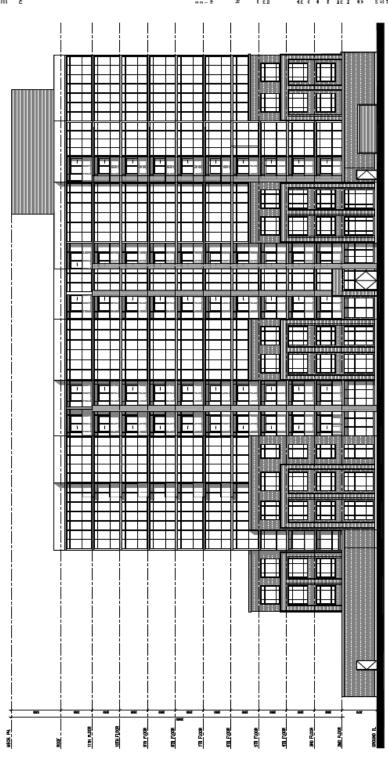




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