

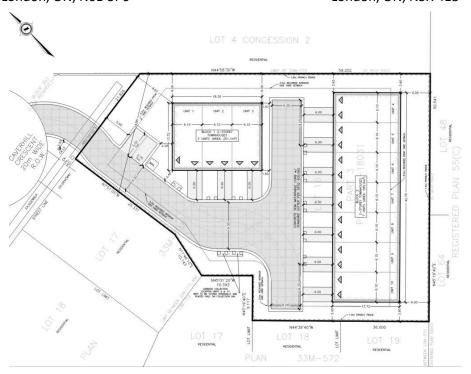
PLANNING JUSTIFICATION REPORT - REVISED

108 CAVERHILL CRESCENT TOWNSHIP OF MIDDLESEX CENTRE COUNTY OF MIDDLESEX

PROPOSED ZONING BY-LAW AMENDMENT APPLICATION TO PERMIT A 10-UNIT TOWNHOUSE DEVELOPMENT

Prepared for:
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November 28, 2024

SBM-23-2498

Attn: Marion-Frances Cabral, Planner

County of Middlesex 399 Ridout Street North London, ON N6A 2P1

RE: Planning Justification Report – 108 Caverhill Crescent, Township of Middlesex Centre, County of Middlesex

Strik, Baldinelli, Moniz Ltd. (SBM) has been retained by Perpetually Innovative Developments Inc. (the "Applicant/Owner") to prepare and submit a Zoning By-law Amendment application for a property municipally identified as 108 Caverhill Crescent located in west Komoka in the southwest portion of the Municipality of Middlesex Centre. The purpose of the application is to permit a 10-unit townhouse development.

This report provides a review and analysis of the applicable relevant policies in support of the proposed Zoning by-law Amendment application. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,

Strik, Baldinelli, Moniz Ltd.

Planning • Civil • Structural • Mechanical • Electrical

Simona Rasanu, RPP, MCIP Planner and Project Lead Jamie Robertson, CPT Planner I

Strik, Baldinelli, Moniz Ltd.

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APPENDIX B – Conceptual Site Plan (attached separately)

1 INTRODUCTION

The purpose of the following land use Planning Justification Report is to evaluate the required Zoning By-Law Amendment (ZBA) application within the context of existing land use policies and regulations, including the Provincial Policy Statement, County of Middlesex Official Plan (including Official Plan Amendment No.3), the Middlesex Centre Official Plan (including Official Plan Amendment No.59), and the Middlesex Centre Zoning Bylaw.

The report demonstrates that the proposed development is in keeping with Provincial, County and Municipal land use planning policies, is suitable for the subject lands, and would be compatible with neighbouring land uses. This report and associated plans and reports are intended to comprise a "complete" application and are reflective of the discussions and correspondence that have been held prior to this formal submission, including a preapplication consultation meeting held with County and Municipal staff on June 20, 2024, which resulted in the meeting minutes included in the submission package (the "Consultation Meeting Minutes").

2 SITE DESCRIPTION

The subject property is municipally identified as 108 Caverhill Crescent and legally described as Lot 16, Plan 33M715; Subject to an easement in gross as in ER765167; Municipality of Middlesex Centre (the "Subject Property"). The "easement in gross" referenced in the legal description is a blanket property easement in favour of the Canadian National Railway Company for noise and vibration due to proximity of the Subject Property to the railway track.

The Subject Property is located on the eastern side of the Caverhill Crescent cul-de-sac bounded by the Canadian National Railway (CNR) track to the north, Duke Street to the south, Komoka Road to the west and Oxbow Drive to the east (see **Figure 1** in Appendix A). The lot is irregular with an area of 284.5 square metres, a depth of 59.2 metres (longest) and a lot width in relation to Caverhill Crescent of 21.8 metres. Access is from Caverhill Crescent and municipal sanitary, water and storm sewers are available from Caverhill Crescent.

The Subject Property is identified as lot 16 on the plan of subdivision registered as Plan 33M715 on May 4, 2017, part of phase IV of the Pemic Komoka (Prince Street) Plan of Subdivision that included a total of 24 lots for single detached dwellings. While most of the lots within this plan of subdivision have been subsequently developed as envisioned, the Subject Property has remained vacant and was purchased by the Applicant/Owner in 2022. A site visit was undertaken on July 31, 2024 and the photos identified as **Figures 2-4** in Appendix A were taken.

3 SURROUNDING CONTEXT

The immediate context surrounding the Subject Property is described below:

North: abutting to the north and northeast is a large property municipally identified as 22685 Komoka Road and zoned Existing Use (EU); further north is the CNR track and industrially zoned lands.

South: single detached residential

West: single detached residential; further west are lands zoned Extractive Industrial (M4-3) and Agricultural west of Oxbow Drive

East: mostly single detached residential; some commercial uses fronting Komoka Road

4 <u>DEVELOPMENT PROPOSAL</u>

As illustrated on the Conceptual Site Plan by SBM dated September 23, 2024 ("the Site Plan"), the Applicant/Owner is proposing to develop the Subject Property with a 10-unit infill townhouse development fronting a private 6 m wide driveway connected to Caverhill Crescent. The townhouse development is proposed to be divided into a smaller block of three (3) units illustrated as Block 1 on the Site Plan with a total footprint area of 251.1 square metres, and a larger block of seven (7) units identified as Block 2 on the Site Plan with a total footprint area of 585.9 square metres. Each townhouse dwelling would be two storeys with a maximum height less than 20 m. Each dwelling would have a minimum width of 6.1 metres and an at-grade rear yard (i.e., private amenity space) with a minimum depth (i.e., rear yard setback) of 6.0 metres.

An integrated garage is proposed in each townhouse to accommodate one car – an additional car can be located on the driveway for a total of 20 parking spaces for residents. Two visitor parking spaces are also proposed near the site entrance to the northeast of unit 1. Although a community mailbox is shown on the Site Plan near the visitor parking spaces, this is subject to revision as Canada Post may not want an onsite mailbox. Therefore, the need for an onsite mailbox will be determined through the technical review process.

Municipal waste management collection is proposed by the Bluewater Recycling Association (BRA). Preapplication consultation with the BRA, including the informal submission of the Truck Turning Movement Plan by SBM dated September 11, 2024 included in the ZBA submission package, informed the proposed site design. BRA staff reviewed and have found the proposed design acceptable for municipal pick-up, as noted in the email from Francis Veilleux dated August 29, 2024, also included in the ZBA submission package. Note that due to the particular specifications of BRA waste management trucks, two of the townhouse units would not be eligible for curbside pick-up, hence the need for a temporary storage/pick-up area for those units, as identified on the Site Plan. As this is a temporary storage site, garbage bins are to be stored within the residential units and only placed to this location on collection day.

The proposed townhouse development, hereafter referred to as the "Development Proposal", can be characterized as a medium-density infill development that attempts to develop the existing irregular lot as efficiently as possible with a building typology that is compatible with the surrounding neighbourhood. Although the surrounding lots within the subdivision have been developed with single detached houses, this building type is not the highest and best use of the Subject Property, which appears as an outlier given its large size and irregular shape.

As noted above, the irregular lot shape informs site design. During the pre-application consultation meeting on June 20, 2024, staff made several comments, including that units 1-3 should be oriented towards or closer to Caverhill Crescent to provide those units with more 'street presence'. Although this urban design comment was considered, implementing it to create actual street-oriented townhouses would have resulted in the loss of units

given the relatively narrow lot width of 21.8 metres, as well as the need for a two-way driveway with a minimum width of 6 metres to accommodate waste and emergency vehicles. A minor reorientation of those units towards Caverhill Crescent would not have materially addressed that comment while resulting in awkward and inconsistently sized rear yards for those units. Landscaping, as well a door and windows on the flanking unit (i.e., unit 1) is an appropriate interface between Block 1 and Caverhill Crescent. Moreover, although farther way, some of the Block 2 townhouses would be directly visible from the public street.

The Consultation Meeting Minutes also noted that the Subject Property may become a corner lot in the future as the above-noted plan of subdivision contemplated the extension of Caverhill Crescent to Arthur Street to accommodate future development on the abutting property municipally identified as 22685 Komoka Road. Although theoretically possible, it is more likely that a private developer would choose to have access directly from the existing Komoka Road and maximize the development potential of their site by not proposing a public street that 'cuts' through it.

5 SUPPORTING STUDIES

5.1 Servicing Feasibility Study

A Servicing Feasibility Study dated September 23, 2024, was prepared by SBM to address servicing feasibility for the Development Proposal. The report concludes that the existing sewers and watermains have the capacity needed to accommodate the Development Proposal. This will be demonstrated during detailed design at the building permit stage.

6 PLANNING FRAMEWORK

6.1 Existing Planning Framework

The existing planning framework includes the Provincial Policy Statement (2020), the County of Middlesex Official Plan (July 7, 2023), Middlesex Centre Official Plan (2002), OPA No.59, and the Middlesex Centre Zoning By-law (2005-005).

6.2 Required Planning Applications

As per the Consultation Meeting Minutes, a ZBA application and a site plan control application are required to facilitate the Development Proposal.

6.3 Provincial Policy Statement

The Provincial Policy Statement (PPS), 2020 issued under the authority of Section 3 of the *Planning Act*, "provides policy direction on matters of provincial interest related to land use planning and development" to ensure efficient and resilient development and land use patterns. Any land use planning decision shall be consistent with the PPS. Although PPS 2020 is in force at the time of application submission, the updated PPS (i.e., PPS 2024), which comes into force on October 20, 2024, was reviewed during the drafting of this report. The Development Proposal is

consistent with both versions of the PPS and more specifically supports the following policies referenced in PPS, 2020:

Table 1. Applicable PPS policies

PPS Policy	Response
1.1.3.1	The Subject Property is consistent with this policy by being located in the Komoka Settlement Area.
1.1.3.2a), b), c), d), e)	The Development Proposal would add 10 dwelling units to the local housing supply in an existing residential area using full municipal services.
1.1.3.3	The Development Proposal would assist planning authorities to conform to this policy by intensifying the existing land use and adding 10 residential units to the local housing supply in a settlement area.
1.1.3.4	The Subject Property is envisioned to be used for residential purposes by the local planning framework and the Development Proposal implements this vision at a higher intensity, thereby helping to promote intensification and redevelopment in a compact form, as required by this policy.
1.1.3.5	The Development Proposal would assist the Municipality of Middlesex Centre in meeting its minimum targets for intensification and redevelopment within built-up areas.
Section 1.4 policies	By adding 10 new residential units to the local housing supply, the Development Proposal will assist the Municipality of Middlesex Centre in implementing the housing policies of the PPS, including providing for "an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area" (italics original).
Section 1.6.6 policies	Municipal services are the preferred form of servicing for settlement areas and the Development Proposal would be consistent with these policies.

In conclusion, the Development Proposal is consistent with the relevant policies of the PPS.

6.4 County of Middlesex Official Plan

The County of Middlesex went through an Official Plan (OP) Review process that resulted in the adoption of OPA No. 3 to the existing County Official Plan on July 19, 2022 and approval, with modifications, by the Ministry of Municipal Affairs and Housing on July 7, 2023. This approved version of the Official Plan is now in full force and effect and was reviewed as part of the preparation of this report.

The Subject Property is designated as the Komoka Settlement Area on "Schedule A Land Use". Settlement Areas are further categorized as Urban Areas, Community Areas and Hamlets in Agricultural Areas. Komoka is considered one of the County's 10 Urban Areas.

As outlined in section 2.3.7, the County supports intensification and redevelopment, especially within Settlement Areas:

Intensification and redevelopment, primarily within Settlement Areas, and in other areas where an appropriate level of physical services is or will be available in the foreseeable future and subject to the policies of Section 2.3.6. In this regard, the County will require that 15 percent of all development occur by way of intensification and redevelopment.

Section 2.3.8 states that Urban Areas and Community Areas shall be the focus for future growth, including residential development. Local municipalities have the primary responsibility for detailed planning policy with the Settlement Areas. Per section 2.3.8.1, Urban Areas are meant to have the highest concentration and intensity of land uses in the County as they are expected to accommodate a significant portion of the projected growth over the planning period. Furthermore, new development is intended to be serviced by municipal or communal water or sewage disposal systems. The Development Proposal conforms to the above-noted policies by being an example of infill residential intensification on full municipal services within the Komoka Settlement Area.

6.5 Middlesex Centre Official Plan and OPA No.59

Like the County, the Municipality of Middlesex Centre also went through an Official Plan Review and adopted OPA No.59 on May 18, 2022. However, Council's decision has been appealed and is currently under review by the Ontario Land Tribunal.

The Subject Property is designated "Low Density Residential" under the in-force Official Plan (see **Figure 5** in Appendix A) and "Residential" under the new Council-adopted Official Plan (see **Figure 6** in Appendix A). While the mapping in Schedule A-2 of the in-force Official Plan designates the Subject Property as "Low Density Residential" and distinguishes between "Low Density Residential" and "Medium Density Residential", the policy text does not clearly explain the difference or outline the policy intent for each land use designation. One of the only references to the Low Density Residential designation is in section 5.7.4 (Komoka-Kilworth Residential Area Policies). This section references singles and semis as examples of building types within the Low Density Residential designation, and townhouses as examples of permitted or envisioned building types for the Medium Density Residential. However, the last sentence of policy 5.7.4a) states the following:

Notwithstanding the housing mix targets and net density provisions, multiple dwellings shall be permitted in the Residential designation in accordance with Section 5.2.3.

Notwithstanding the lack of clear alignment between the mapping and the policy text of the in-force Official Plan, an Official Plan Amendment to amend Schedule A-2 should not be required based on the above-noted policy. The new Council-adopted Official Plan includes townhouses as permitted uses with the Residential designation.

The Subject Property is in the Komoka-Kilworth Settlement Area, which is one of the Municipality's two Urban Settlement Areas. The Development Proposal conforms to the general Settlement Area policies outlined in section 5.1.4 by using full municipal services. As the Development Proposal is an example of infill development on a vacant lot within a registered plan of subdivision, no settlement area expansions are proposed. Although the ZBA submission package does not include detailed building design characteristics and it is exempt from site plan control in accordance with Bill 23, the Conceptual Site Plan illustrates a townhouse development that uses the irregular lot as efficiently as possible and is compatible with the surrounding single detached houses, in accordance with policy 5.1.4f) in the in-force Official Plan and 5.1.4g) in the new Official Plan. Detailed building design drawings, which would be provided at the building permit stage, will have regard for Municipal urban design guidelines.

Section 5.2 of the in-force Official Plan outlines general residential policies for Urban and Community Areas and Hamlets. The Development Proposal does not conflict with any of the relevant policies and particularly supports policy 5.2.1a), which states the following:

a) The Municipality will provide and encourage a wide variety of housing types, sizes and tenures to meet demographic and market requirements for the Municipality's current and future residents.

The new Official Plan increases the percentage of development to be provided by way of intensification to 20% in Urban Settlement Areas. The Development Proposal would assist the Municipality in achieving this goal.

Policy 5.2.3 of the in-force Official Plan outlines policies for multiple dwellings, including townhouses, in residential areas. Some of the policies have been removed or modified in the new Official Plan, as outlined in Section 5.3.3. **Table 2** below outlines each policy based on the language in the in-force Official Plan and provides responses.

Table 2. Policies For Multiple Dwellings in Residential Areas

Official Plan 5.2.3 policies	Response		
5.2.3a)	The Subject Project is located in Komoka, a community and former village in Middlesex Centre. The nearest park is Caverhill Park within a 10-minute walk. The nearest public elementary school is Parkview Public School within a 20-minute walk. The Subject Site is also within walking distance or a short (i.e., less than five minutes) car drive to the commercial establishments on Komoka Road to the east and southeast, south of the railway tracks.		
5.2.3b)	It is not uncommon to have townhouses surrounded by lower density single detached houses, and there is no reason to believe the two types of building typologies cannot be compatible. Notwithstanding, this policy was removed in the new Official Plan.		
5.2.3c)	This policy is not relevant as apartment buildings are not being proposed.		

5.2.3d)	The Development Proposal is a 10-unit infill townhouse development surrounded by single detached houses. There is no excessive clustering.		
5.2.3e)	Komoka Drive to the south and south is designated a Village Centre. Although not adjacent, the Subject Property is located within walking distance to it.		
5.2.3f)	Although the Development Proposal is no longer subject to site plan control per Bill 23 amendments to the <i>Planning Act</i> , the detailed design drawings will have regard for applicable Municipal standards, including the design goals outlined in section 6 of the Official Plan.		

Section 5.7 of the in-force Official Plan outlines the Komoka-Kilworth Secondary Plan policies for this Urban Settlement Area. The Development Proposal conforms to the relevant policies and particularly supports the following housing-related goals outlined in section 5.7.1 by providing additional housing options in an existing residential neighbourhood on full municipal services. These policies essentially remain the same in the new Official Plan.

- a) To establish a balanced mix of land uses serving key functions of a complete and vibrant community, including housing, local businesses, employment, schools, recreation facilities, and parks and open space;
- b) To plan for a community of all ages by providing a diversity of housing choice and affordability and providing community and recreational services to match population needs;
- c) To provide for additional housing and employment and address urban land requirements for these uses in the Municipality through intensification of existing developed areas and compact land use in new development areas;
- f) To provide for an appropriate range and mix of housing types and densities;
- i) To require full municipal services and direct new development in accordance with the servicing strategy for the area;

To direct new development away from natural hazard areas and minimize risks to public safety;

Section 5.7.2 outlines land use policies for this secondary planning area. Again, these policies remain unchanged in the new Official Plan. The most relevant policy is 5.7.2a) which envisions, among other things, "a mix of housing types and densities distributed among residential and medium density residential areas". Section 5.7.4 outlines specific residential policies. Policy 5.7.4a) includes a chart comprised of the targeted types of housing (including townhouses) and associated density provisions. Per policy 5.7.4c), the proposed townhouses would have an appropriate amount of at-grade amenity space in the form of a rear yard for each unit. Considering the irregular lot shape of the Subject Property, the two townhouse blocks are oriented as efficiently as possible to accommodate typical site services (e.g., fire access and waste management storage). Although detailed building design drawings are not required for the ZBA application, the design of the attached garage proposed for each townhouse unit is expected to conform to this policy. Finally, although it appears that policy 5.7.4e) is intended

for larger residential developments, soft landscaping is proposed at the front of the Subject Property to enhance the private-public realm interface and create a welcoming environment for residents and visitors entering the Subject Property.

Finally, section 6.0 of the in-force Official Plan outlines municipal design policies. High-level settlement area design goals are provided in section 6.1. The more specific goals relevant for this project are design policies for site plans and infill developments in section 6.3, particularly policy 6.3b), f), and g). With respect to policies 6.3b) and f), the detailed design drawings required for the building permit stage would illustrate conformity with these two policies. Given its large size and irregularity compared to surrounding single detached house lots, using the Subject Property for one single detached house is not the highest and best use. The Development Proposal is a good example of infill intensification that efficiently adds 10 residential units to a vacant, remnant parcel and provides housing choice in an existing neighbourhood. With respect to policy 6.3f), although it is understood that municipal design policies and guidelines typically request or encourage buildings and their principal doors to face the street, this does not always result in the most efficient site layout or have regard for other values prioritized by future occupants, such as privacy. In this case, the Subject Property is an irregular lot with a relatively narrow frontage abutting an existing cul-de-sac. These existing site constraints prevent the smaller townhouse block (i.e., units 1-3) from directly facing the public street (i.e., Caverhill Crescent). Although this townhouse block could be angled to partially face the street, this would lead to inconsistent rear yards for those units and would only make a marginal difference to the goal of having that building block have a stronger street presence. In my opinion, having soft landscaping near the entrance and an architectural pleasing end unit with a door and appropriate windows would create a more welcoming public-private interface while allowing for consistent townhouse units.

In my professional opinion, the Development Proposal and the ZBA application required to implement it conform to the relevant policies of both the in-force and new Middlesex Centre Official Plan.

6.6 Zoning Analysis and Proposed Zoning By-law Amendment

The Subject Property is currently zoned UR1-9 (Urban Residential First Density) (see **Figure 7** in Appendix A), which permits single detached dwellings and does not permit townhouses. As such, a rezoning is being sought to a site-specific Urban Residential Third Density Zone (UR3 – X), which would permit townhouse dwellings. The Site Plan includes a zoning chart comparing the relevant required versus proposed regulations. In addition to the zone change from UR1-9 to UR3, the four (4) special provisions identified in **Table 3** below are being requested.

It is important to note that the proposed zoning standards are intended to apply to the entire Subject Property, notwithstanding that some of the UR3 zoning standards are on a per unit basis. The future legal tenure of the Development Proposal has not yet been determined, although the Applicant/Owner is currently leaning towards a vacant land condominium, which would require approval of a draft plan of condominium application to subdivide the land and create the individual townhouse units. Regardless of the eventual legal tenure, it is preferred that the site-specific zoning be established through the subject ZBA application process to avoid later zoning deficiencies that would result in a minor variance application. As such, in addition to the four (4) numerical special provisions noted below, I am proposing to add the following additional special provision: "Notwithstanding the definition of "Lot" in Middlesex Centre Zoning By-law 2005-005, as amended, the entire area zoned UR3-X is considered a "Lot", and despite any future severance, partition, or division of the Lot within a condominium plan,

the provisions of this By-law shall apply to the whole of the zone as if no severance, partition or division had occurred".

Table 3. Zoning Analysis Summary

			functional site elements, such as
			municipal waste pick-up.
Rear Yard Setback (m	8.0	6.0	Each townhouse rear yard is
min)			proposed to have a consistent
			depth of 6.0 metres, which results
			in a minimum rear yard area of
			36.6 square metres (394 square
			feet) for the internal townhouse
			dwellings. This rear yard/private amenity space is sufficiently large
			to accommodate a typical outdoor
			deck and provide some green
			space for gardening and/or
			passive recreation.
Density (units/ha max)	30.0	36	The Middlesex Centre Zoning By-
			law was adopted in 2005, or
			almost 20 years ago. The
			Development Proposal reflects
			contemporary townhouse
			development design standards
			and market realities, including
			increased land and construction
			costs. The Applicant/Owner
			desires to contribute to housing
			choice and offer a more
			affordable product than the
			· ·
			surrounding single detached
			houses, which requires a certain
			density to make the project
			financially feasible. In my opinion,
			the proposed 10 units maximizes
			the development potential of the
			Subject Property while providing a
			"missing middle" type of housing
			that is compatible with the
			surrounding residential
			neighbourhood.
Outdoor amenity area	45.0	36.6	The minimum proposed outdoor
(m²/unit min)			amenity area of 36.6 square
			metres reflects the rear yards of
			the internal townhouses – the end
			units would have additional

outdoor space in the form of side
yards. As noted above, in my
opinion this rear yard/private
amenity space is sufficiently large
to accommodate a typical outdoor
deck and provide some green
space for gardening and/or
passive recreation.
Furthermore, although not
confirmed by the
Applicant/Owner at this time,
there is some open space near the
site entrance east of the proposed
driveway that could potentially be
developed as a dedicated
common amenity space.
, .

In my professional opinion, the requested special provisions are appropriate to permit the Development Proposal.

7 CLOSING

Based on a review of the relevant policies and regulatory framework for the Subject Property, the ZBA application required to implement the Development Proposal are justified for the following reasons:

- The Development Proposal is an example of small-scale infill intensification compatible with the surrounding neighbourhood on a remnant, vacant parcel of land that would provide 10 townhouse units on full municipal services. The townhouses would increase housing choice and supply, and complement the existing single detached houses in the surrounding residential community created through the approval of phase IV of the Pemic Komoka (Prince Street) Plan of Subdivision.
- It is consistent with the PPS (in-force and 2024 version) and generally conforms to the County and Middlesex Centre Official Plans.
- The requested special provisions are appropriate for a Development Proposal that reflects contemporary townhouse building design standards and market economics.

For the reasons noted above and throughout this report, the proposed ZBA application represents sound land use planning.

Strik, Baldinelli, Moniz Ltd.

Planning • Civil • Structural • Mechanical • Electrical

Simona Rasanu, RPP, MCIP Planner and Project Lead

Jamie Robertson, CPT

Planner I

APPENDIX A: FIGURES 1-7

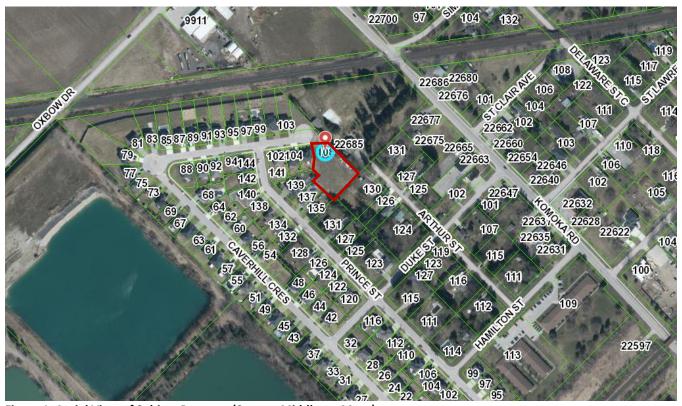


Figure 1. Aerial View of Subject Property (Source: Middlesex Maps)



Figure 2. View of Subject Property looking southeast



Figure 3. View of Subject Property looking towards western property limit abutting 106 Caverhill Crescent



Figure 4. View of Subject Property looking towards eastern property limit abutting 22685 Komoka Road

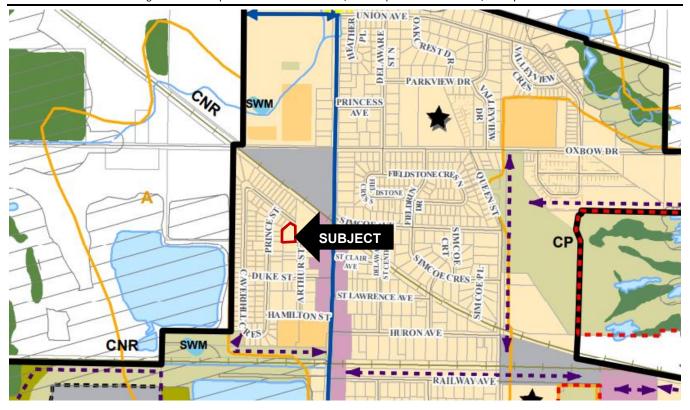


Figure 5. In-force Middlesex Centre Official Plan designation - *Low Density Residential* (Source: Schedule A-2: Komoka-Kilworth Urban Settlement Area & Secondary Plan)



Figure 6. New Council-approved Middlesex Centre Official Plan designation - Residential (Source: Schedule A-9 Komoka Urban Settlement Area



Figure 7. Subject Property - existing zoning (Source: Middlesex Maps)