

Planning Justification Report - Update  
Castlegrove Subdivision, Gananoque  
Draft Plan of Subdivision and Class III Development  
Permit

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Prepared for 1622378 ONTARIO INC.  
by IBI Group  
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## Executive Summary

This report is in support of applications for Draft Plan of Subdivision and a Class III Development Permit. The applicant is proposing the construction of a four phase subdivision, with the first phase consisting of a thirty (30) dwelling units, being a mix of 6 semi-detached units and 24 townhouse units. The proposed second, third and fourth phases are proposed to provide for a mix of semi-detached and single-detached residential building forms. New public roads are to be created as a result of the applications, including Wilmer Avenue, an easterly extension of Pine Street, a northerly extension of Conner Drive, and a new Street “B” connecting Pine Street and Conner Drive. A large new public park is also proposed (Block ‘H’ of Draft Plan).

The Draft Plan of Subdivision and a Class III Development Permit applications were submitted to the Town in Spring 2018. These original applications were for the first phase of the subdivision only, with the intention being to file applications for subsequent phases at a later date. However, since submission of the original application, and given comments received from the Town and commenting agencies, the owner has decided to revise the subject Development Permit and Draft Plan of Subdivision applications such that they encompass the whole of the lands and consider all four (4) phases rather than just the 1<sup>st</sup> phase. This Planning Report has been revised in support of the updated applications, and we understand that updated engineering plans and report(s), as required, are also being provided. It is understood that Final Plan of Subdivision approval may take place in phases, per the draft plan, and that each phase of the subdivision may be registered on that basis, with the necessary detailed supporting report and plans required for each phase prior to Final approval being granted and registration occurring.

The subject site is designated *Residential* in the Town of Gananoque Official Plan and Development Permit By-law. Single and Semi-detached dwellings are permitted on lands within this designation. Townhouse Dwellings are listed as discretionary uses. A Class III Development Permit application is required to permit the development of all discretionary uses.

The following table outlines the relief requested as part of this Class III Development Permit application. In addition to requesting that townhouse dwellings be permitted on the subject lands, this application seeks to permit an increase in the maximum permitted lot coverage for townhouse units, as well as parking in the front yard.

Although semi-detached dwellings are permitted on the subject lands, relief is required for lot coverage, lot area, and front yard setbacks for some of the lots.

Single-detached dwellings are also permitted, but relief is being requested to allow for increased lot coverage and front yard parking occupation, and decreased lot area and frontage.

The requested relief is detailed in Table 1, below.

**Table 1. Development Permit Requirements and Proposed Relief**

Zone Provision	Single detached dwelling			Semi-detached dwelling			Townhouse dwellings		
	‘R’ & ‘R-X4’	Proposed	Relief Required	‘R’ & ‘R-X4’	Proposed	Relief Required	‘R’ & ‘R-X4’	Proposed	Relief Required
Lot Coverage (max)	35%	40%	+5%	40%	47%	+7%	40%	53%	+13%
Lot Area (min)	464 m <sup>2</sup>	336 m <sup>2</sup>	- 128 m <sup>2</sup>	334 m <sup>2</sup>	327 m <sup>2</sup>	-7 sq.m.			

<b>Lot Frontage (min)</b>	15 m	12 m	- 3 m						
<b>Front Yard Setback (min)</b>				6.0m	5.0 m (Lot 1A of Phase 1 only)	-1.0m			
<b>Parking Standard</b>	50% front yard coverage	60%	+10%				Location: Side & Rear Yard	Front Yard	Yes

# 1 Introduction

IBI Group has prepared this Planning Justification report on behalf of 1622378 ONTARIO INC., the owner of the property legally described as Part of Lot 16, Concession 1, Town of Gananoque. This report provides planning justification for the approval of the draft plan of subdivision, which is to encompass the whole of the subject lands, as identified in Figure 1.

**Figure 1. Subject Lands (VuMap, 2019)**



This Planning Justification report is in support of applications for Draft Plan of Subdivision and a Class III Development Permit. The applicant is proposing the construction of a four phase subdivision, with the first phase consisting of a thirty (30) dwelling units, being a mix of 6 semi-detached units and 24 townhouse units. The proposed second, third and fourth phases are proposed to provide for a mix of semi-detached and single-detached residential building forms, with the final mix to be determined as part of the Final Plan of Subdivision approval. New public

roads are to be created as a result of the applications, including Wilmer Avenue, an easterly extension of Pine Street, a northerly extension of Conner Drive, and a new Street "B" connecting Pine Street and Conner Drive.

The purpose of this report is to assess the appropriateness of the proposed development within the context of the surrounding community and the Province's and Town's policy framework. The following is included in this report:

- A summary of the application;
- An overview of the subject lands and surrounding uses;
- A description of the proposed development;
- A review and assessment of the appropriateness of the proposed development within the context of the surrounding community and relevant policy documents guiding land use planning and development in the Town of Gananoque; and
- Planning justification for the development proposal taking into consideration all of the above.

## 2 Pre-consultation and Required Studies

A pre-consultation meeting with Town Staff was held on November 30, 2017 to determine application requirements. At the meeting, Town Staff indicated that a Class III Development Permit application would be required to permit the proposed development, in addition to the Draft Plan of Subdivision application. Based on the pre-consultation meeting with Town Staff, the following submissions were identified as being required in support of the Class III Development Permit and Draft Plan of Subdivision applications:

- Application fees
- Planning Justification Report
- Site Plan
- Site Servicing Plan
- Drainage and/or Stormwater Management Report
- Grade Control and Drainage Plan
- Elevation and Cross-Section Plan
- Traffic Study

Staff have also indicated that the Traffic Study can be reduced in scope for the first phase to a letter of opinion from a traffic engineer, understanding that a full-scope traffic study will be required for subsequent phases of the subdivision.

The Class III Development Permit and Draft Plan of Subdivision applications were submitted to the Town in Spring 2018. This original application was for only the first phase of the subdivision, with the intention being to file applications for subsequent phases at a later date. However, since submission of the original application, and given comments received from the Town and commenting agencies, the owner has decided to revise the subject Development Permit and Draft Plan of Subdivision applications such that they encompass the whole of the lands and consider all four (4) phases rather than just the 1<sup>st</sup> phase. This Planning Report has been revised in support of the updated applications, and we understand that updated engineering plans and report(s), as required, are also being provided. It is understood that Final Plan of Subdivision approval may

take place in phases, per the plan, and that each phase of the subdivision may be registered on that basis, with the necessary detailed report and plans required for each phase prior to Final approval being granted and registration occurring.

### 3 Site Overview and Surrounding Uses

The subject lands are located north of MacDonald Drive, east of Elmwood Drive, south of King Street East and west of Loneys Lane (see Figure 2). The total area of the subject lands is approximately 7.84 ha and they are presently vacant.

The subject lands are surrounded by residential, commercial and institutional uses. To the south is MacDonald Drive, which is developed with single-detached dwellings. T.R. Leger School is located on MacDonald Drive, directly to the west of the subject lands. Most of the lands to the south and southwest are occupied by residential dwellings in the form of single-detached units. King Street East is located north of the subject lands, and is the Town's main commercial thoroughfare. Several commercial uses are located on King Street East nearby the subject lands, including Shoppers Drug Mart, Canadian Tire, and No Frills. Several tourist lodging establishments and hotels are also located north of the subject lands off of King Street East. The lands directly to the east are undeveloped and vegetated with trees (identified as *Significant Woodlands* in the Official Plan).

**Figure 2. Site Location and Surrounding Uses**



### 4 Proposed Development

#### 4.1 Description of Development Proposal

The proposed development is a four (4) phase subdivision of the vacant lands located north of MacDonald Drive, east of Elmwood Drive, and south of the commercial uses fronting on King

Street East in Gananoque. Phase 1 consists of the construction of thirty (30) dwelling units: 6 semi-detached units and 24 townhouse units through Plan of Subdivision. The proposed lot areas for Phase 1 range from 261 m<sup>2</sup> to 415 m<sup>2</sup>, with lot frontages of between 8.8 m to 14.5 m.

The proposed second, third and fourth phases are proposed to provide for a mix of semi-detached and single-detached residential building forms. New public roads are to be created as a result of the applications, including Wilmer Avenue in support of Phase 1, and an easterly extension of Pine Street, a northerly extension of Conner Drive, and a new Street "B" connecting Pine Street and Conner Drive in support of Phases 2 through 4.

A large new public park is also proposed at the approximate centre of the subdivision, indicated as Block 'H' on the Draft Plan of Subdivision. This park block is approximately 1 hectare in size and constitutes 12.8% of the lands, meaning that there will be an over-dedication of parkland (5% required under the Planning Act). The park is proposed to be accessed from the proposed Conner Drive extension, from "Street 'B'", and possibly from Thomas Avenue. A 3 m wide multi-use path is also proposed on the north side of the Pine Street extension and "Street B", providing a through connection to the eastern boundary of the site (and the multi-use trail on that property).

The development proposal also includes a connection to the proposed park block from MacDonald Drive. This will be accomplished by taking a 5 m wide parcel from the existing vacant lot between 17 and 18 MacDonald Avenue. This existing vacant lot will also be expanded by the addition of Block G. This is all as indicated on the Draft Plan of Subdivision.

## 4.2 Development Application Summary

A Draft Plan of Subdivision application and a Class III Development Permit are being sought in order to permit the development of a four (4) phase subdivision, with the first phase of thirty (30) dwelling units and a new public road being proposed for immediate development and the remaining phases to be developed as market demand allows and subject to separate Final Plan of Subdivision approvals. The Development Permit seeks relief as follows:

For Single-Detached Dwellings:

- Increase the maximum permitted lot coverage from 35% to 40%;
- Decrease the minimum required lot area from 464 m<sup>2</sup> to 336 m<sup>2</sup>;
- Decrease the minimum required lot frontage from 15 m to 12 m; and
- Increase the maximum permitted front yard parking occupation from 50% to 60%.

For Semi-Detached Dwellings:

- Increase the maximum permitted lot coverage from 40% to 47%;
- Decrease the minimum required lot area from 334 m<sup>2</sup> to 327 m<sup>2</sup>; and
- Decrease the minimum required front yard setback for Lot 1A from 6.0 m to 5.0 m.

For Townhouse Dwellings;

- Increase the maximum permitted lot coverage from 40% to 53%; and
- Permit parking in the front yard through the provision of driveways.

## 4.3 Access and Parking

Each dwelling unit will be accessed from a proposed new public street, or an extension of an existing public street. These new or extended public streets are indicated on the Draft Plan of Subdivision and include Wilmer Avenue, Conner Drive, Pine Street and "Street 'B'" (name to be

assigned). Each dwelling unit has a driveway and garage, which equates to two parking spaces per unit.

## 5 Planning Policy Framework

The following provides a review and discussion of the applicable planning policies guiding development of the subject lands. In considering the planning merits of the proposed development, the Provincial Policy Statement, Town of Gananoque Official Plan, and Town of Gananoque Development Permit By-law were all examined.

### 5.1 Provincial Policy Statement

The current Provincial Policy Statement (PPS) came into effect on April 30, 2014, and was issued under Section 3 of the *Planning Act*, requiring that all land use planning decisions considered under the *Act* be consistent with the PPS. The PPS provides policy direction on matters of provincial interest related to land use planning and development. Generally, the PPS requires that municipal councils ensure there is an efficient pattern of land use, that there is a coordinated and comprehensive approach to arriving at land use decisions, and that development contributes to the long-term economic prosperity of the municipality. It also encourages land use patterns that accommodate an appropriate range and mix of residential uses in a manner that supports intensification and redevelopment in already serviced areas and discourages expansion of the urban boundary.

The development of the subject lands with row, single-detached and semi-detached housing is consistent with the PPS. The proposal includes the construction of a mix of residential forms and densities (single- and semi-detached and townhouse dwellings) in an area that is already well serviced and within a settlement area. The proposed development represents appropriate intensification and the natural expansion of an area already occupied by residential uses and is consistent with the policies of the PPS.

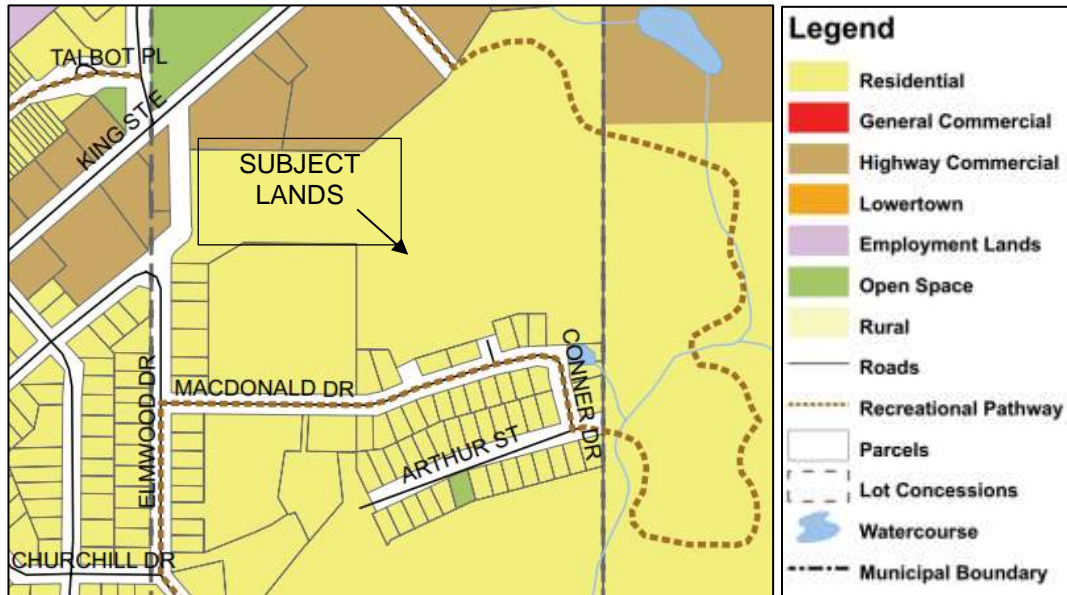
### 5.2 The Town of Gananoque Official Plan

The Town of Gananoque Official Plan was adopted by the Town in 2009. The Official Plan provides a framework to manage future growth and guide land use decisions and development within the Town.

The subject lands are designated *Residential* pursuant to Schedule I of the Official Plan (see Figure 3). As described in section 3.2 of the Official Plan, Gananoque's residential neighbourhoods are intended to "preserve and consolidate existing residential neighbourhoods and to provide for new residential opportunities through intensification and redevelopment of vacant buildings to allow a mix of commercial and residential uses". A range of residential uses are permitted, including low-density single-detached dwellings to high-density apartment dwellings.



**Figure 3. Excerpt from Schedule I of the Official Plan**



Section 5.4.1 of the Official Plan details the technical, environmental, planning and design considerations related to Plan of Subdivision applications. This section of the report outlines the planning and design considerations and comments on how the proposed development addresses each.

1. *Consistency with the Lowertown Master Plan where applicable*

The subject lands are not located within the Lowertown District Policy Area.

2. *Lot and block configuration*

The configuration of the subject lands represents a logical extension of the residential uses to the south. The proposal reflects an efficient development pattern and road layout for low and medium-density residential uses in close proximity to services and amenities.

A maximum lot coverage of 40% reflects a reasonable ratio for single-detached dwellings, but as a portion of the proposal is for semi-detached and townhouse dwellings, an increase in lot coverage is anticipated to allow for the construction of a more diverse supply of housing options. Semi-detached and townhouse dwellings generally have a higher lot coverage due to the elimination of one or both side yards. It should be noted that all of the townhouse lots, and most of the semi-detached lots meet the minimum and maximum requirements, as per the Development Permit By-law, for lot area, lot frontage, front yard setback, and rear yard depth. The lot areas and lot coverage proposed has also generally been improved with the revised submission compared to the original Spring 2018 submission. This is in response to Staff comments regarding the proposed lots.

This development proposal is consistent with modern subdivision developments in urban areas and on full municipal services.

3. *Compatibility with adjacent uses*

The subject lands are located adjacent to an existing low-rise residential community to the south and southwest. As shown in Schedule I of the Official Plan, the subject lands are bound on three sides by lands designated *Residential*. The proposed development of the subdivision with low and medium density building forms is in keeping with the low-rise residential character of the neighbourhood. The dwellings are of a similar scale, design and form as the

residential dwellings in the surrounding community. As such, it is not anticipated that the proposed development will negatively impact the abutting properties' occupants' ability to enjoy their property.

Section 3.2.2.5 of the Official Plan states that infill development, which is the same scale and density of adjacent residential uses, is encouraged where services are available. The proposed residential development is an infill project located in an area well serviced by municipal infrastructure. Although the proposed development results in higher densities than the adjacent residential communities, the ground-oriented residential built form is similar, and the Town of Gananoque seeks to reach an overall housing density target of 12 units per gross hectare, through a mix of low, medium and high density development (see section 3.2.2.8). The proposed mix of single-detached, semi-detached and row-house dwelling types is anticipated to result in a density of approximately 17 units per hectare (including the proposed new public roads and parkland). This is considered to be low density and in keeping with the existing and planned character of the area.

Additionally, section 3.2.2.8 of the Official Plan outlines that higher density residential development is encouraged in areas in proximity to: commercial designations, open space, and arterial or collector roads. Although it is not clear if "higher" density development means "high density", but regardless, the subject site is well suited for "higher" density residential, as the lands are located adjacent to commercial lands to the north, open space to the east and west, and an arterial road to the north (King Street East).

4. *Road access, street layout and pedestrian amenities*

Each dwelling unit will be accessed from a proposed new public street, or an extension of an existing public street. These new or extended public streets are indicated on the Draft Plan of Subdivision and include Wilmer Avenue, Conner Drive, Pine Street and "Street 'B'" (name to be assigned). Public sidewalks are planned on one side of all new public streets, and 3.0 m wide pedestrian pathways will be provided to the new public park at the centre of the subdivision. Provision will also be made for a multi-use path along the Pine Street / Street 'B' extension to provide for an East-West connection from existing or planned pathways.

5. *Parks and open space amenities*

A large new public park is also proposed at the approximate centre of the subdivision, indicated as Block 'H' on the Draft Plan of Subdivision. This park block is approximately 1 hectare in size and constitutes 12.8% of the lands, meaning that there will be an over-dedication of parkland (5% required under the Planning Act). The park is proposed to be accessed from the proposed Conner Drive extension, from "Street 'B'", and possibly from Thomas Avenue.

The broader lands owned by the applicant are located adjacent to lands designated *Significant Woodlands* to the east, and a school with open space to the west. Additionally, a large area identified in the Official Plan as *Open Space* is located just north of the subject lands at King Street East and Wilson Drive. We understand that there are publically-accessible pathways on the lands to the east, which could be accessed by residents of the proposed subdivision.

6. *Easement and right-of-way requirements*

The residential subdivision is to be built to municipal standards, meeting all easement and right-of-way requirements.

7. *Justification of the need for the Subdivision*

As outlined in section 2.3 of the Town of Gananoque Official Plan (2009), the Town is forecasted to grow by approximately 5,900 people by the year 2029. It is anticipated that this phase of development, and the subsequent phases, will accommodate some of this growth.

Assuming an average household size of 2.1 persons (2016 Census), this phase of development will house approximately 63 persons.

8. *In considering a draft plan of subdivision, regard shall be had to, among other matters, the criteria of Section 51 (24) of the Planning Act, R.S.O. 1990., as detailed below:*

a) *The effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2.*

As discussed in section 5.1 of this report, the development of the subject site with residential uses is consistent with matters of provincial interest. The proposal includes the construction of a mix of residential forms in an area that is already well serviced and within a settlement area. The proposed development represents appropriate intensification and the natural expansion of an area occupied by residential uses.

b) *Whether the proposed subdivision is premature or in the public interest;*

The proposed subdivision is an infill development in the Town of Gananoque Settlement Area. As detailed in section 3.2.2.5 of the Official Plan, infill development which is the same scale and density of adjacent residential uses is encouraged where services are available

This subdivision represents the logical extension of the residential community to the south. The phased subdivision development will allow units to be absorbed as the market allows, and is not considered premature, as the lands are designated for development (*'Residential'*) and are within the serviced settlement area boundary of the municipality.

c) *Whether the plan conforms to the official plan and adjacent plans of subdivision, if any;*

The Plan of Subdivision conforms to the Official Plan designation of the subject lands as *Residential*. The proposed development will contribute to achieving the Town's overall housing density target of 12 units per gross hectare, as outlined in section 3.2.2.8. The OP states that higher density developed is to be located in areas well served by amenities and open space, which the subject lands are.

d) *The suitability of the land for the purposes for which is to be subdivided;*

The proposal is for an infill residential development project that is already serviced by existing municipal infrastructure, open space and commercial uses. The subject lands are designated *Residential* in the Official Plan and zoned *Residential* in the Development Permit By-law. The proposed development represents the logical extension of the existing subdivision on MacDonald Drive to the south. The provision of single-detached, semi-detached and townhouse dwelling units on the lands will increase the variety of housing options in the Town of Gananoque.

e) *The number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;*

Each dwelling unit will be accessed from a proposed new public street, or an extension of an existing public street, all to be created through the Plan of Subdivision process. An opinion on traffic by a qualified person accompanies this submission.

f) *The dimensions and shapes of the proposed lots;*

The dimension and shape of the proposed lots conform to most of the development and building standards laid out in the Town of Gananoque Development Permit By-law, as detailed in Section 5.3 of this report. Relief is being requested from the lot coverage, lot area and lot frontage requirements for certain building forms. Having said that, the characteristics of the proposed lots reflect recent/modern housing and development patterns throughout southern Ontario.

The proposed development will increase the availability of different housing forms within the Town. Semi-detached and townhouse dwelling units provide smaller, and generally more affordable, housing options than single-detached dwellings, so this component of the subdivision is particularly attractive.

- g) The restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;*

This criteria is not applicable to the proposed development.

- h) Conservation of natural resources and flood control;*

No natural resources have been identified on the subject lands and flood control will be addressed as part of the stormwater management analysis accompanying this submission.

- i) The adequacy of utilities and municipal services;*

The proposed residential development is to be serviced through connections to existing municipal water and sanitary lines. Servicing and stormwater matters are addressed in the stormwater management and servicing analyses accompanying this submission.

Two elementary schools, Linklater Public School and St. Joseph Catholic School, are located within the Town of Gananoque. Additionally, the Town has one secondary school, Gananoque Secondary School. We are also aware of one continuing education centre, T.R. Leger School of Adult, Alternative and Continuing Education, which is located directly west of the subject lands.

- j) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;*

A new public park is proposed to be conveyed for public use. It is proposed at the approximate centre of the subdivision, indicated as Block 'H' on the Draft Plan of Subdivision. This park block is approximately 1 hectare in size and constitutes 12.8% of the lands. The park is proposed to be accessed from the proposed Conner Drive extension, from "Street 'B'", and possibly from MacDonald Drive.

- k) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and*

Although the proposed development does not directly impact or influence energy use and conservation, the increased proposed density in comparison to the predominantly single-detached residential neighbourhoods to the south and west is generally associated with more efficient patterns of land use, which can support things like public transit and alternative transportation options, both of which can reduce energy use. Higher densities of development also typically optimize use of existing infrastructure and services.

- l) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the City of Toronto Act, 2006. 1994, c. 23, s. 30; 2001, c. 32, s. 31 (2); 2006, c. 23, s. 22 (3, 4); 2016, c. 25, Sched. 4, s. 8 (2).*

Site plan control does not apply to the proposed development.

### 5.3 Town of Gananoque Development Permit By-law

The Town of Gananoque Development Permit By-law (Zoning) was adopted by Council in October 2010. The Development Permit By-law combines zoning, site plan and minor variance approvals into one development stream.

The Development Permit By-law designates the subject lands *Residential*, consistent with the Official Plan. The intent of this designation is to allow for a “varied density of residential uses”. As such, the following uses are permitted within the *Residential* designation:

- **Single-Detached Dwelling**
- **Semi-Detached Dwelling**
- Triplex Dwelling
- Home Based Business (subject to section 3.23)
- Playground

Additionally, the following are listed as discretionary uses:

- Converted Dwellings
- Bed and Breakfast Establishments
- Group Home
- Heritage Tourist Inn
- Personal Service Establishment
- Places of Worship
- School (Public or Private)
- Apartment Dwelling (Freehold or Condominium)
- Day Nursery
- **Townhouse Dwelling (Freehold or Condominium)**

As outlined in bold above, single-detached and semi-detached dwellings are permitted as-of-right within the *Residential* designation; however, townhouse dwellings are listed as a discretionary use. This Planning Justification report is being submitted as part of the Class III Development Permit approval, as detailed as a requirement in Section 5.4.3.

The following section of this report examines the site provision requirements for Single-Detached, Semi-Detached and Townhouse Dwellings on lands designated *Residential*, as well as what is being proposed as part of the residential development. As outlined in Tables 2, 3 and 4, the lands are also subject to Special Exception Designation R-X4.

**Table 2: Single-Detached Requirements and Proposed Relief**

	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Location of Parking Spaces)	Percentage of Front Yard Occupied by Parking (max)	50%	60%	+10%
5.3 (Single-Detached)	Lot Area (min)	464m <sup>2</sup>	336m <sup>2</sup>	-128m <sup>2</sup>
5.3 (Single-Detached)	Lot Coverage (max)	35%	40%	+5.0%
5.3 (Single-Detached)	Lot Frontage (min)	15.0m	12.0m	-3.0m

	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Single-Detached)	Front Yard Setback (min)	6.0m	6.0m	No
5.3 (Single-Detached)	Exterior Side Yard Setback (min)	4.5m	4.5m	No
5.3 (Single-Detached)	Interior Side Yard (min)	1.2m	1.2m	No
5.3 (Single-Detached)	Rear Yard Depth (min)	7.5m	7.5m	No
5.3 (Single-Detached)	Building Height (max)	11.0m	11.0m	No
5.3 (Single-Detached)	Parking (min)	2 spaces/unit	2	No
3.32	Parking Space Dimensions	3m x 6m	3m x 6m	No
5.3 (Single-Detached)	Parking Location	Front yard or side yard	Front yard	No
5.3 (Single-Detached)	Parking Coverage (max)	50%	Less than 50%	No

As detailed in Table 2, relief is requested from minimum lot area and frontage, and from the maximum lot coverage provisions. The following provides justification for the requested relief:

**Front Yard Parking Coverage:** Where single-detached dwellings are proposed, particularly those with 50 foot (15.24 m) frontages, the development would include the option for a three (3) car garage house design, which necessitates a driveway wider than 7.62 m given the requirement for a 3 m wide parking space (9 m wide). The alternative to this would be to reduce the width of the driveway to less than the equivalent of three parking space widths. It would be feasible to provide a 7.8 m to 8.1 m wide driveway and still provide functional vehicle access to these lots. As an aside, it is not clear if relief is actually required in these situations as the required parking will be in the garage and not technically in the front yard – the provision is not clear if it applies to driveways leading to the parking spaces in a garage or to a driveway regardless of whether it is used for the required parking space(s).

**Lot Area:** As per the Town's Development Permit By-law, single-detached dwellings are to have a minimum lot area of 464 m<sup>2</sup>. Relief is being sought from this minimum lot area to allow the option of standard 40 foot lots, with depths ranging from approximately 92 feet to 140 feet. The standard requirement of 464 m<sup>2</sup> equates to a 50 foot by 100 foot lot, which is increasingly rare in conventional subdivisions. Such large lots may constitute some of the development in the subdivision, but the ability to provide a more traditional (and affordable) 40 foot lot is desirable. Although this reduced frontage is somewhat smaller than the 50 foot lots more typically found on the streets south of the subject lands, the 40 foot lot widths and proposed lot area will be in keeping

with the character of the area as a modern subdivision and not, in our opinion, result in negative impacts on the character of the area.

**Lot Coverage:** Relief is being sought to increase the maximum permitted lot coverage from 35% to 40%. We understand that this is consistent with what was originally intended for the subdivision lands, and it is consistent with most contemporary subdivision designs. The lot coverage proposed will still allow for sufficient green space and parking on site, and stormwater management can be accommodated appropriately through the detailed design of the subdivision process.

The proposed lot coverage allows only for the main building on each lot, and so accessory sheds that would be included in lot coverage would not be allowed under the proposed zoning. The applicant has identified that they typically include property maintenance services with the housing units when they are sold, thus allowing homeowners to forego the need for things like lawn mowers, snow blowers, etc. that might otherwise be stored in an accessory garden shed. The single-detached building form also often has a larger garage that would allow for the storage of lawn maintenance equipment and furniture, etc.

**Table 3: Semi-Detached Requirements and Proposed Relief**

	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Semi-Detached)	Lot Area (min)	334m <sup>2</sup>	327 m <sup>2</sup>	-7m <sup>2</sup>
5.3 (Semi-Detached)	Lot Coverage (max)	40%	47%	+7%
5.3 (Semi-Detached)	Lot Frontage (min)	9.0m	9.75m	No
5.3 (Semi-Detached)	Front Yard Setback (min)	6.0m	5.0 m (Lot 1A of Phase 1 only)	-1.0 m (Lot 1A of Phase 1 only)
5.3 (Semi-Detached)	Exterior Side Yard Setback (min)	4.5m	4.5m	No
5.3 (Semi-Detached)	Interior Side Yard (min)	1.2m	1.2m	No
5.3 (Semi-Detached)	Rear Yard Depth (min)	7.0m	7.0m	No
5.3 (Semi-Detached)	Building Height (max)	11.0m	11.0m	No
5.3 (Semi-Detached)	Parking (min)	2 spaces/unit	2	No
3.32	Parking Space Dimensions	3m x 6m	3m x 6m	No
5.3 (Semi-Detached)	Parking Location	Front yard or side yard	Front yard	No

	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Semi-Detached)	Parking Coverage (max)	50%	Less than 50%	No

As detailed in Table 3, relief is requested from minimum lot area, maximum lot coverage and minimum exterior side yard setbacks. The following provides justification for the requested relief from minimum lot area and minimum exterior side yard setback:

**Lot Area:** As per the Town's Development Permit By-law, semi-detached dwellings are to have a minimum lot area of 334 m<sup>2</sup>. Relief is being sought from this minimum lot area for only one of the six semi-detached lots (Lot 1A). Lot 1A has a proposed area of 327 m<sup>2</sup>. This reduction from the required minimum lot area is minor and is not anticipated to result in any negative impacts on the functionality of the lot, the streetscape or the character of the area.

**Lot Coverage:** An increase in lot coverage for the proposed semi-detached lots is proposed, from 40% to 47%. This relief is not anticipated to negatively impact the functionality of the lot, stormwater management, or result in an appearance of overdevelopment. The minimum required lot frontage will be met for all lots, and the minimum lot area relief required (if any) is very minor. Adequate space is provided on the lot for parking and amenity area, and the proposed building envelopes are standard for typical modern development. We note that some, if not all, of the proposed semi-detached buildings are anticipated to be bungalows – the reduced height of this building form will further mitigate any potential appearance of overdevelopment compared to a two or three-storey building form.

**Front Yard:** Relief from the minimum front yard setback is required for Lot 1A of Phase 1 only. This is because the proposed extension of Wilmer Avenue slightly “wraps around” the SE corner of the frontage of this proposed lot (due to apparent difference in the alignment of the road allowance at this point). Functionally, this slight reduction at the corner of the lot is not anticipated to result in any negative impacts. Adequate front yard space is still provided between the building and the streetline in front of the building for a parking space (6.0 m).

**Table 4. Townhouse Requirements and Proposed Relief**

	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Townhouse Dwellings)	Lot Area (min)	220m <sup>2</sup>	261m <sup>2</sup>	No
5.3 (Townhouse Dwellings)	Lot Coverage (max)	40%	Highest: 53%	+13%
5.3 (Townhouse Dwellings)	Lot Frontage (min)	6.0m	8.2m	No
5.3 (Townhouse Dwellings)	Front Yard Setback (min)	6.0m	6.0m	No
5.3 (Townhouse Dwellings)	Exterior Side Yard Setback (min)	4.5m	4.5m	No



	ZONE PROVISION	'R' & 'R-X4' ZONE REQUIREMENT	PROPOSED	RELIEF REQUIRED
5.3 (Townhouse Dwellings)	Interior Side Yard (min)	1.2m	1.2m	No
5.3 (Townhouse Dwellings)	Rear Yard Depth (min)	7.0m	7.0m	No
5.3 (Townhouse Dwellings)	Building Height (max)	11.0m	11.0m	No
3.32	Parking (min)	1.25 spaces/ unit	1.25+	No
3.32	Parking Space Dimensions	3m x 6m	3m x 6m	No
5.4.2	Parking Location	Interior side yard or rear yard	Front yard	Yes
5.4.2	Parking Coverage (max)	40%	Less than 40%	No

As detailed in Table 4, relief is requested from maximum lot coverage and parking location. The following provides justification for the requested relief from parking location and from lot coverage:

**Parking Location:** The proposed development includes driveways in the front yard. Each driveway provides access to unit garages. Relief is being sought to provide parking for townhouse dwellings through the provision of a driveway in the front yard. As outlined in section 5.4.2 of the Development Permit By-law, “no parking shall be allowed in either the required front or exterior side yards” for multi-unit dwellings. In keeping with the character of the surrounding neighbourhood, driveways are proposed in the front yard. The residential dwellings fronting MacDonald Drive and Arthur Street to the south all have driveways located in the front yard, so the streetscape of the proposed development will be consistent with that found in the existing neighbourhood.

**Lot Coverage:** Relief is being sought to increase the maximum permitted lot coverage for the townhouse lots in Phase 1. The request is to increase the maximum permitted lot coverage from 40% to 53% for townhouse units.

A lot coverage of 40% reflects a reasonable ratio for single-detached dwellings, but given the changes to the Plan of Subdivision, as noted above, an increase in lot coverage is anticipated to allow for the construction of a more diverse supply of housing options. Semi-detached and townhouse dwellings generally have a higher lot coverage due to the elimination of one or both side yards. For example, the middle units of each townhouse lot have the highest requested lot coverage of 53% because these lots do not have any side yard. These lots do, however, still meet the requirements, as per the Development Permit By-law, for lot area, lot frontage, front yard setback, and rear yard depth. Given the typical building footprint proposed and the fact that the proposal meets or exceeds these other performance provisions, we would suggested that the maximum lot coverage allowances of the zoning by-law are inappropriate for any contemporary townhouse product that would be proposed in a subdivision development.

One of the concerns of increased lot coverage is that the amount of impervious surface on the lot is reduced, thus increasing potential stormwater runoff. This is addressed through the supporting stormwater management analysis by the project engineer.

The proposed lot coverage allows only for the main building on each lot, and so accessory sheds that would be included in lot coverage would not be allowed under the proposed zoning. The applicant has identified that they typically include property maintenance services with the housing units when they are sold, thus allowing homeowners to forego the need for things like lawn mowers, snow blowers, etc. that might otherwise be stored in an accessory garden shed.

### **Conclusion**

It is our professional opinion that the proposed uses and the requested relief is appropriate and will accommodate a form of development that is compatible with the existing and planned development in the *Residential* designation of the Town's Official Plan.

With respect to the approach to zoning for each phase, we are proposing that Phase 1 be zoned as per the Draft Plan of Subdivision and the Phase 1 Lott Plan (C1) prepared by Eastern Engineering. For Phases 2 through 4, we propose that a Special Exception Designation be used to allow for both single-detached and semi-detached building forms, as per the zoning tables outlined above. This "lot-less blocks" approach to zoning allows for some flexibility in the future phases of development to react to market demand and build a mix of building forms.

## **6 Discussion and Conclusion**

This Planning Justification report is filed in support of a revised Class III Development Permit application and associated Draft Plan of Subdivision application. The applicant is proposing the construction of a four phase subdivision, with the first phase consisting of a thirty (30) dwelling units, being a mix of 6 semi-detached units and 24 townhouse units. The proposed second, third and fourth phases are proposed to provide for a mix of semi-detached and single-detached residential building forms. New public roads are to be created as a result of the applications, including Wilmer Avenue, an easterly extension of Pine Street, a northerly extension of Conner Drive, and a new Street "B" connecting Pine Street and Conner Drive. A large new public park is also proposed (Block 'H' of Draft Plan).

The applications will enable the development of an undeveloped parcel within the Town of Gananoque Settlement Area, making efficient use of existing services and nearby commercial and retail services along King Street East.

Based on our review of the Provincial Policy Statement and the Town of Gananoque Official Plan, we are of the opinion that the proposal is consistent with the intent of the Provincial Policy Statement and conforms to the policies of the Official Plan, specifically the policies and criteria that speak to encouraging infill development where services are available, providing a broad mix of housing types and densities, and locating higher density residential development in locations close to commercial services, open space and arterial or collector roads. The proposed development, in our opinion, is appropriate for the site and surrounding community, and constitutes good land use planning.

The relief requested from the Development Permit By-law are required to facilitate a higher density of residential development in the form of townhouse dwelling units. Relief is also being requested from some of the zone provisions for each of the proposed single-detached, semi-detached and row house building forms. It is our professional opinion that the relief request is appropriate, is consistent with the PPS and conforms to the policies of the Official Plan.

The proposed development is an extension of the existing residential subdivision to the south, and it maintains the general character and form of the neighbourhood.

In conclusion, it is our professional opinion that the applications for a Class III Development Permit and Draft Plan of Subdivision are appropriate, constitute good land use planning, and are in the public interest.

We look forward to the Town's thoughtful consideration of this application. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,  
**IBI Group**

A handwritten signature in black ink that reads "Mark Touw". The signature is written in a cursive style with a long horizontal stroke extending to the right.

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Mark Touw MCIP, RPP  
Associate