

Planning Justification Report and Urban Design Brief Proposed Mixed Use Building 215 King Street West, Hamilton, ON

August 2022



I. Expert Qualifications

I (Michael Barton) am a Registered Professional Planner (RPP) and full member of the Ontario Professional Planners Institute (OPPI). I am the President and Founder of MB1 Development Consulting Inc. ("MB1") and a highly qualified land use planning and real estate development professional with extensive and diverse experience in all aspects of commercial and residential real estate development. I have practiced land use planning for over 20 years in communities across Ontario and Canada. I have been qualified as an expert in land use planning by the Ontario Land Tribunal (formerly Local Planning Appeal Tribunal (LPAT) and Ontario Municipal Board (OMB)), as well as the Toronto Local Appeal Body (TLAB).

II. Retainer

I have been retained by the Owner of 215 King Street West (the "Subject Property") to prepare this Planning Justification Report and Urban Design Brief with respect to the development proposal.

III. Executive Summary

NOTE TO DRAFT: to be added prior to submission with complete application

IV. Background and Overview

IV.1 Site Location and Existing Conditions

The Subject Property is located at 215 King Street West in the City of Hamilton, which is on the southwest corner of the intersection of King Street West and Caroline Street South, as illustrated in **Figure 1**. This property is currently occupied by a 1-storey retail building and surface parking area, as illustrated in the street view in **Figure 2** and aerial photo in **Figure 3**. The existing building is located towards the rear of the property with surface parking along the King Street West and Caroline Street frontages.



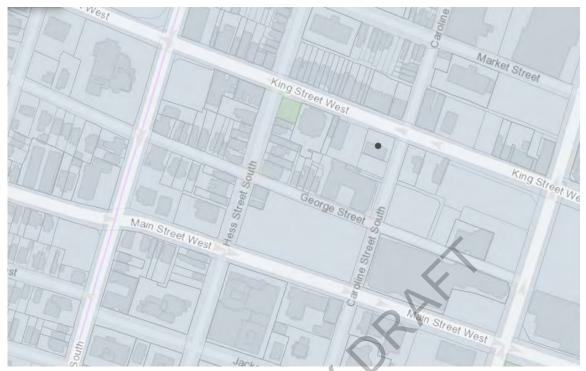


Figure 1 – Site Location



Figure 2 – Street View of Subject Property from King Street West



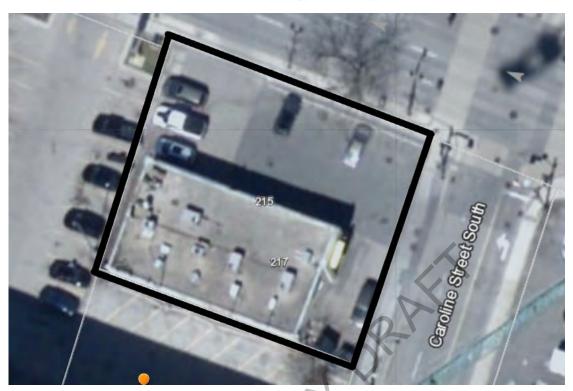


Figure 3 - Aerial View of Subject Property

IV.2 Surrounding Land Uses and Built Form

Figure 4 identifies the location of existing uses surrounding the Subject Property, which include the following:

- 1. 2 and 3-storey mixed use buildings on the north side of King Street West (street view in Figure 5);
- 2. Low density residential uses on southwest corner of Caroline Street/Market Street intersection (street view in **Figure 6**);
- 3. 13-storey apartment building at 155 Market Street (street view in Figure 7);
- 4. Staybridge Suites backing directly onto the Subject Property (street view in Figure 8);
- 5. Multiple storey commercial building and A & W restaurant (street view in Figure 9);
- 6. Multiple storey mixed use building immediately east of Subject Property (street view in Figure 10);
- 7. 1-storey retail building (Tim Horton's) and surface parking lot (street view in Figure 11);
- 8. 6-storey multi-residential building (street view in Figure 12); and
- 9. 2-storey mixed use buildings including ground floor retail and commercial uses (street view in **Figure 13 and 14**).





Figure 4 – Land Uses Surrounding Subject Property

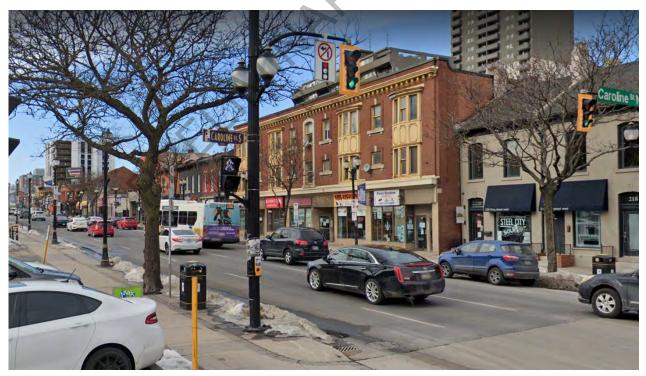


Figure 5 – Existing 2 and 3-Storey Mixed Use Buildings on North Side of King Street West





Figure 6 – Low Density Residential Uses on Southwest Corner of Caroline Street/Market Street

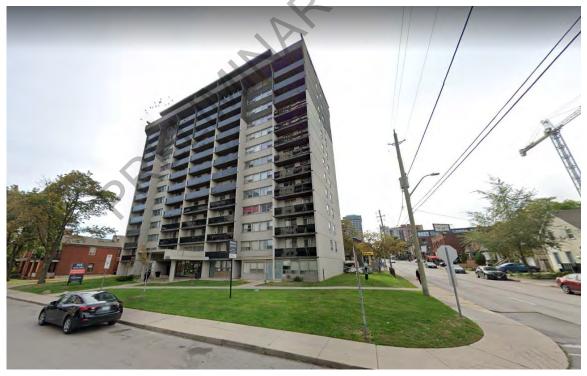


Figure 7 – Existing Apartment Building at 155 Market Street





Figure 8 – Staybridge Suites Backing onto Subject Property



Figure 9 – Commercial Building and A & W Restaurant on Northeast Corner of King Street West/Caroline Street South



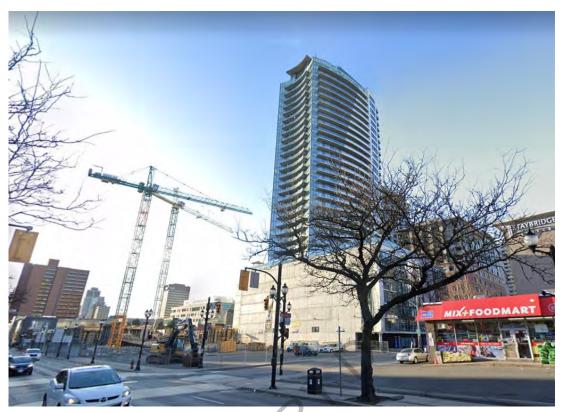


Figure 10 – Multiple Storey Mixed Use Building on Southeast Corner of King Street West/Caroline Street



Figure 11 – Retail Building (Tim Horton's) to West of Subject Property





Figure 12 – 6-storey Multi-Residential Building to West of Subject Property (fronting onto King St W)



Figure 13 – 2-Storey Mixed Use Buildings Fronting onto George Street (between Hess St and Caroline St)





Figure 14 – 2-Storey Mixed Use Buildings Fronting onto Hess Street

IV.3 Existing Land Use Planning Designations

IV.3.1 Provincial Land Use Policies

IV.3.1.2 Provincial Policy Statement, 2020 (PPS 2020)

The Subject Property is located within the existing "Settlement Area", which is defined as follows in Section 6.0 of PPS 2020 as "urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets) that are: a) built-up areas where development is concentrated and which have a mix of land uses; and b) lands which have been designated in an official plan for development over the long-term planning horizon."

IV.3.1.2 A Place to Grow – Growth Plan for the Greater Golden Horseshoe, 2020 (Growth Plan)

The Subject Property is located within the "Delineated Built-Up Area" and the Downtown Hamilton Urban Growth Centre. The Subject Property is also located on a "Priority Transit Corridor" identified on Schedule 5 of the Growth Plan.



IV.3.2 Municipal Land Use Policies

IV.3.2.1 Urban Hamilton Official Plan (UHOP)

The Subject Property is designated on the following UHOP schedules as follows:

Schedule E (Urban Structure):	Downtown Urban Growth Centre (Node)
Schedule E-1 (Urban Land Use Designations):	Downtown Mixed Use Area
Schedule C (Functional Road Classification):	Major Arterial (King Street West)
Volume 2, Appendix A:	Downtown Hamilton Secondary Plan Area
Downtown Hamilton Secondary Plan Land Use Plan	Downtown Mixed Use (Pedestrian Focus)
(Map B.6.1-1):	
Downtown Hamilton Secondary Plan Maximum	High-rise 2
Building Heights (Map B.6.1-2):	
Downtown Hamilton Secondary Plan Higher Order	Priority Transit Corridor
Transit (Appendix A):	*Higher Order Transit Station located at Queen St
	S/King St W (less than 2 blocks west of Subject
	Property)
Downtown Hamilton Secondary Plan Viewshed	Locations Where There May Be Impacts to Views
Analysis (Appendix C):	α

IV.3.2.2 City of Hamilton Zoning By-Law 05-200

The Subject Property is zoned D2 (Downtown Mixed Use - Pedestrian Focus) and is subject to holding provisions H17, H19 and H20. All of the properties surrounding the Subject Property are also zoned D2 with various holding provisions. Schedule F includes Special Figures to the Zoning By-Law, with the following being applicable to the Subject Property:

- Figure 1 establishes Maximum Building Heights, including 83 metres for the Subject Property;
- Figure 2 delineates Heritage Character Zones; the Subject Property is located within such a zone;
- Figure 15 relates to the minimum Building Base Façade Height, which is set at 16 metres for properties fronting on King Street West in the vicinity of the Subject Property.

However, the holding provisions establish the following additional requirements for the Subject Property:

Holding Provision 17

Notwithstanding Figure 1 – Special Figures of By-law 05-200, on those lands zoned Downtown (D1), (D2), and (D5) Zone, identified on Maps 868, 869, 909, 910, 911, 951, 952, 953, 954, 994, 995 of Schedule "A" – Zoning Maps development shall be restricted in accordance with the following:



- a) For such time as the Holding Provision is in place, these lands shall only be used for permitted uses, buildings and structures listed in the (D1), (D2), or (D5) Zone.
- b) Regulations For such time as the Holding Provision is in place, these lands shall be subject to the regulations of the (D1), (D2), or (D5) Zones except where in conflict with the following:
 - i) No development exceeding the maximum height of 44.0 metres.
- c) Conditions for Holding Provision Removal The Holding Provision shall, upon application by the landowner, be removed by way of an amending Zoning By-law, from all or part of the lands subject to this provision when the following conditions have been satisfied:
 - i) That the landowner demonstrate to the satisfaction of the Director of Planning and Chief Planner, City of Hamilton, that sufficient land assembly has occurred to achieve the minimum lot area requirement and lot frontage requirement in accordance with Section 6.0 of this Bylaw.
 - ii) That the landowner demonstrate that the proposal conforms to the policies of the Downtown Hamilton Secondary Plan by submitting the following studies to the satisfaction of the Director of Planning, and Chief Planner, City of Hamilton:
 - 1. Shadow Impact Study;
 - 2. Pedestrian Level Wind Study;
 - 3. Visual Impact Assessment;
 - 4. Traffic Impact Study; and,
 - 5. Functional Servicing Report.
 - iii) That the landowner demonstrate that the proposed development does not exceed the height of the Niagara Escarpment to the satisfaction of the Director of Planning and Chief Planner, City of Hamilton.
 - iv) That conditional site plan approval be received, which shall address matters including but not limited to Design Review Panel advice, to the satisfaction of the Director of Planning and Chief Planner, City of Hamilton.

Holding Provision 19

Notwithstanding Figure 1 – Special Figures of By-law 05-200, on those lands zoned Downtown (D1), (D2), and (D5) Zone, identified on Maps 868, 869, 909, 910, 911, 951, 952, 953, 954, 994, 995 of Schedule "A" – Zoning Maps development shall be restricted in accordance with the following:

a) For such time as the Holding Provision is in place, these lands shall only be used for permitted uses, buildings and structures listed in the (D1), (D2), or (D5) Zone.



- b) Regulations For such time as the Holding Provision is in place, these lands shall be subject to the regulations of the (D1), (D2), or (D5) Zones except where in conflict with the following:
 - i) No development exceeding 44.0 metres in height.
- c) Conditions for Holding Provision Removal The Holding Provision shall, upon application by the landowner, be removed by way of an amending Zoning By-law, from all or part of the lands subject to this provision when the following conditions have been satisfied:
 - i) That the landowner shall be required to enter into a Section 37 Agreement to secure provision of Community Benefits to the satisfaction of the Director of Planning and Chief Planner, City of Hamilton.

Holding Provision 20

Notwithstanding Figure 1 – Special Figures of By-law 05-200 on those lands zoned Downtown (D1), (D2), and (D5) Zone, identified on Maps 868, 869, 909, 910, 911, 951, 952, 953, 954, 994, 995 of Schedule "A" – Zoning Maps development shall be restricted by the following:

- a) For such time as the Holding Provision is in place, these lands shall only be used for permitted uses, buildings and structures listed in the (D1), (D2), or (D5) Zone.
- b) Regulations For such time as the Holding Provision is in place, these lands shall be subject to the regulations of the (D1), (D2), or (D5) Zones except where in conflict with the following:
 - i) No development exceeding 22.0 metres in height.
- c) Conditions for Holding Provision Removal The Holding Provision shall, upon application by the landowner, be removed by way of an amending Zoning By-law, from all or part of the lands subject to this provision when the following conditions have been satisfied:
 - i) That the landowner demonstrate that how any development having the effect of removing all or part of rental housing comprised of three or more units will be replaced to the satisfaction of the Director of Planning and Chief Planner, City of Hamilton.
 - ii) That the landowner enter into an Agreement with the City of Hamilton.

IV.4 Development Proposal

The development proposal for the Subject Property includes a 14-storey mixed use building plus a mechanical penthouse, with 3 levels of underground parking. The key development statistics are included in the following table:



Development Statistics - Proposed Mixed Use Building

Building Height	48.4 metres (14 storeys + mechanical penthouse)
Building Base Façade Height (Levels 1 – 5)	16 metres
Number of Residential Units (Levels 3 – 14)	68
Total Gross Floor Area	5,957.8 m ² (64,129 ft ²)
Retail Gross Floor Area	160.9 m ² (1,732 ft ²)
Number of Parking Spaces	23

Figures 15 through 20 include the architectural renderings and drawings of the proposed building. The complete architectural package is included in **Appendix A**.



Figure 15 – Render View from Caroline Street





Figure 16 – Render Views from King Street West/Caroline Street Intersection



Figure 17 – Cross-Section and Axonometric View



KING STREET WEST



Figure 18 – Site Plan



Figure 19 - East and North Elevations



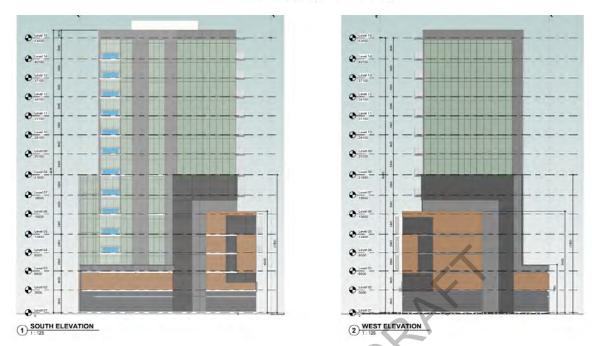


Figure 20 - South and West Elevations

- V. Land Use Planning and Urban Design Analysis
- V.1 Provincial Land Use Planning Policy
- V.1.1 Provincial Policy Statement (PPS 2020)

V.1.1.1 Policy Overview

The Provincial Policy Statement, 2020 (PPS 2020) is issued under the authority of section 3 of the Planning Act and came into effect on May 1, 2020. Section 3 of the Planning Act requires that decisions affecting planning matters "shall be consistent with" policy statements issued under the Act. Comments, submissions or advice that affect a planning matter that are provided by the council of a municipality, a local board, a planning board, a minister or ministry, board, commission or agency of the government "shall be consistent with" this Provincial Policy Statement.

The following sections are relevant to my analysis of the development proposal for consistency with the applicable policies of PPS 2020:

Section	Policies
Part IV: Vision for Ontario's Land Use	1.1.1 Healthy, liveable and safe communities are sustained by:
Planning System	
	a) promoting efficient development and land use patterns which sustain the financial
1.0 Building Strong Healthy	well-being of the Province and municipalities over the long term;
Communities	b) accommodating an appropriate affordable and market-based range and mix of



1.1 Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns	residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
	c) avoiding development and land use patterns which may cause environmental or
	public health and safety concerns; e) promoting the integration of land use planning, growth management, transit- supportive development, intensification and infrastructure planning to achieve cost- effective development patterns, optimization of transit investments, and standards to
	minimize land consumption and servicing costs;
	h) promoting development and land use patterns that conserve biodiversity. 1.1.3 Settlement Areas
	1.1.5 Settlement Areas
	1.1.3.1 Settlement areas shall be the focus of growth and development.1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which:
	a) efficiently use land and resources;
	 b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
	e) support active transportation;
	f) are transit-supportive, where transit is planned, exists or may be developed
	Land use patterns within settlement areas shall also be based on a range of uses
	and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.
	1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.
	1.1.3.4 Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.
2	1.1.3.5 Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.
	However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas. 1.1.3.6 New development taking place in designated growth areas should occur
	adjacent to the existing built-up area and should have a compact form, mix of uses and
	densities that allow for the efficient use of land, infrastructure and public service
1.4 Housing	facilities. 1.4.3 Planning authorities shall provide for an appropriate range and mix of housing
1.1.1.003mg	options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:
	a) establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homelessness plans. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;
	b) permitting and facilitating:



	 all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;
	c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;
	d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;
	e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and
	f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of
1.6 Infrastructure and Public Service	public health and safety. 1.6.7 Transportation Systems
Facilities	
	1.6.7.2 Efficient use should be made of existing and planned infrastructure, including
	through the use of transportation demand management strategies, where feasible.
	1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize
	the length and number of vehicle trips and support current and future use of transit
1.7 Long Torm Economic Prognority	and active transportation.
1.7 Long-Term Economic Prosperity	1.7.1 Long-term economic prosperity should be supported by:
	a) promoting opportunities for economic development and community investment-
	readiness; b) encouraging residential uses to respond to dynamic market-based needs
	and provide necessary housing supply and range of housing options for a diverse
	workforce;
	c) optimizing the long-term availability and use of land, resources, infrastructure and
	public service facilities;
	d) maintaining and, where possible, enhancing the vitality and viability of downtowns and main streets; e) encouraging a sense of place, by promoting well-designed built
	form and cultural planning, and by conserving features that help define character,
	including built heritage resources and cultural heritage landscapes;
	g) providing for an efficient, cost-effective, reliable multimodal transportation system
X	that is integrated with adjacent systems and those of other jurisdictions, and is
*	appropriate to address projected needs to support the movement of goods and people;
	i) sustaining and enhancing the viability of the agricultural system through protecting
	agricultural resources, minimizing land use conflicts, providing opportunities to support
	local food, and maintaining and improving the agri-food network

V.1.1.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.1.1.3 Urban Design Analysis

NOTE TO DRAFT: Analysis to be added to final draft document



V.1.2 Growth Plan for the Greater Golden Horseshoe

V.1.2.1 Policy Overview

The Growth Plan for the Greater Golden Horseshoe 2019 was prepared and approved under the Places to Grow Act, 2005 to take effect on May 16, 2019. Amendment 1 (2020) to the Growth Plan for the Greater Golden Horseshoe 2019 was approved by the Lieutenant Governor in Council, Order in Council No 1244/2020 to take effect on August 28, 2020. As set out in Section 1.2.2 of this Plan, all decisions in respect of the exercise of any authority that affects a planning matter will conform with this Plan, subject to any legislative or regulatory provisions providing otherwise.

The Growth Plan is intended to build upon the policies of PPS 2020 and provide more detailed land use planning policies for specific regions and municipalities. The policies of the Growth Plan take precedence over the policies of PPS 2020 to the extent of any conflict, except where the relevant legislation provides otherwise. In other words, the Growth Plan provides more detailed policies and targets to achieve the broader level objectives of PPS 2020.

The following sections are relevant to my analysis of the development proposal for conformity to the applicable policies of the Growth Plan:

Section	Policies
1.2.1 Guiding Principles	 Support the achievement of complete communities that are designed to support healthy and active living and meet people's needs for daily living throughout an entire lifetime. Prioritize intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability. Support a range and mix of housing options, including additional residential units and affordable housing, to serve all sizes, incomes, and ages of households. Improve the integration of land use planning with planning and investment in infrastructure and public service facilities, including integrated service delivery through community hubs, by all levels of government. Protect and enhance natural heritage, hydrologic, and landform systems, features, and functions.
2.2 Policies for Where and How to Grow	2. Forecasted growth to the horizon of this Plan will be allocated based on the following: a) the vast majority of growth will be directed to settlement areas that:
2.2.1 Managing Growth	 i. have a delineated built boundary; ii. have existing or planned municipal water and wastewater systems; and iii. can support the achievement of complete communities; c) within settlement areas, growth will be focused in: i. delineated built-up areas; ii. strategic growth areas; iii. locations with existing or planned transit, with a priority on higher order



	transit where it suists on is planted, and
	transit where it exists or is planned; and iv. areas with existing or planned public service facilities
	17. dread with existing of planned public service radilities
	3. Upper- and single-tier municipalities will undertake integrated planning to manage forecasted growth to the horizon of this Plan, which will:
	a) establish a hierarchy of settlement areas, and of areas within settlement areas, in accordance with policy 2.2.1.2;
	b) be supported by planning for infrastructure and public service facilities by considering the full life cycle costs of these assets and developing options to pay for
	these costs over the long-term; c) provide direction for an urban form that will optimize infrastructure, particularly
	along transit and transportation corridors, to support the achievement of complete communities through a more compact built form
	4. Applying the policies of this Plan will support the achievement of complete communities that:
	a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;
	 c) provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;
	d) expand convenient access to:
	 i. a range of transportation options, including options for the safe, comfortable and convenient use of active transportation; iii. an appropriate supply of safe, publicly-accessible open spaces, parks, trails,
	and other recreational facilities
	e) provide for a more compact built form and a vibrant public realm, including public open spaces
2.2.3 Urban Growth Centres	Urban growth centres will be planned: Continue to the planned in the plan
	a) as focal areas for investment in regional public service facilities, as well as commercial, recreational, cultural, and entertainment uses;
	b) to accommodate and support the transit network at the regional scale and
	provide connection points for inter- and intra-regional transit;
	c) to serve as high-density major employment centres that will attract provincially,
	nationally, or internationally significant employment uses; and
	d) to accommodate significant population and employment growth.
	2. Urban growth centres will be planned to achieve, by 2031 or earlier, a minimum density target of:
	b) 200 residents and jobs combined per hectare for each of the Downtown
	Brampton, Downtown Burlington, Downtown Hamilton, Downtown Milton, Markham Centre, Downtown Mississauga, Newmarket Centre, Midtown Oakville, Downtown Oshawa, Downtown Pickering, Richmond Hill Centre/Langstaff Gateway,
	Vaughan Metropolitan Centre, Downtown Kitchener, and Uptown Waterloo urban growth centres
2.2.4 Transit Corridors and Station Areas	2. For major transit station areas on priority transit corridors or subway lines, upper- and single-tier municipalities, in consultation with lower-tier municipalities, will delineate the
	boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.



	3. Major transit station areas on priority transit corridors or subway lines will be planned for a minimum density target of:
	b) 160 residents and jobs combined per hectare for those that are served by light rail transit or bus rapid transit
	9. Within all major transit station areas, development will be supported, where appropriate, by:
	 a) planning for a diverse mix of uses, including additional residential units and affordable housing, to support existing and planned transit service levels; b) fostering collaboration between public and private sectors, such as joint development projects; c) providing alternative development standards, such as reduced parking standards; and d) prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities. 10. Lands adjacent to or near to existing and planned frequent transit should be planned to be transit-supportive and supportive of active transportation and a range and mix of
	uses and activities.
2.2.6 Housing	1. Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will:
	a) support housing choice through the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan by:
	 i. identifying a diverse range and mix of housing options and densities, including additional residential units and affordable housing to meet projected needs of current and future residents;

V.1.2.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.1.2.3 Urban Design Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2 Municipal Land Use Planning Policy

V.2.1 Urban Hamilton Official Plan

V.2.1.1 Policy Overview

Section	Policies



V.2.1.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.1.3 Urban Design Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.2 City of Hamilton Zoning By-Law 05-200

V.2.2.1 Policy Overview

Section	Policies

V.2.2.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.2.3 Urban Design Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.3 City-Wide Corridor Planning Principles and Design Guidelines

V.2.3.1 Policy Overview



Section	Policies

V.2.3.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.3.3 Urban Design Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.4 City of Hamilton Site Plan Guidelines

V.2.4.1 Policy Overview

Section	Policies

V.2.4.2 Land Use Planning Analysis

NOTE TO DRAFT: Analysis to be added to final draft document

V.2.4.3 Urban Design Analysis



NOTE TO DRAFT: Analysis to be added to final draft document

VI. Conclusions and Recommendations

NOTE TO DRAFT: conclusions and recommendations to be added to final draft

Regards,

Michael Barton, MCIP, RPP

President

MB1 Development Consulting Inc.