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File: OZ-8300
Planner: Mike Davis

TO:	CHAIR AND MEMBERS PLANNING & ENVIRONMENT COMMITTEE
FROM:	JOHN M. FLEMING MANAGING DIRECTOR, PLANNING AND CITY PLANNER
SUBJECT:	APPLICATION BY: ST. LEONARD'S COMMUNITY SERVICES 313 CLARKE ROAD MEETING ON JUNE 3, 2014

RECOMMENDATION

That, on the recommendation of the Managing Director, Planning and City Planner, the following actions be taken with respect to the application of St. Leonard's Community Services relating to the property located at 313 Clarke Road:

- (a) the proposed by-law attached hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting on June 10, 2014 to amend the Official Plan by adding a "Special Policy" to Section 10 – Policies for Specific Areas – of the Official Plan to allow for a Group Home Type 2 in the Low Density Residential designation at 313 Clarke Road; and
- (b) the proposed by-law attached hereto as Appendix "B" **BE INTRODUCED** at the Municipal Council meeting on June 10, 2014 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan as amended in part (a) above, to change the zoning of the subject property **FROM** a Residential R1 (R1-7) Zone, **TO** a Residential R1/Community Facility Special Provision (R1-7/CF5(_)) Zone.
- (c) pursuant to Section 34(17) of the *Planning Act*, as determined by the Municipal Council, no further notice **BE GIVEN** in respect of the proposed by-law as the prescribed notification requirements have previously been met, a statutory public participation meeting was held on April 8, 2014, and no changes to the by-law have been proposed.

PREVIOUS REPORTS PERTINENT TO THIS MATTER
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April 8, 2014 Report to Planning and Environment Committee – 313 Clarke Road (OZ-8300) – This report recommended approval of an Official Plan and Zoning By-law amendment in response to an application by St. Leonard's Community Services to allow for the establishment of a Group Home Type 2 within an existing single detached dwelling at 313 Clarke Road. The recommended Official Plan and Zoning By-law amendments would have allowed for a Group Home Type 2 within the existing dwelling, with special zoning provisions to restrict further exterior additions, and prohibit "Supervised Residences" to ensure that the facility is limited to an appropriate intensity of eight (8) persons excluding Staff.

PURPOSE AND EFFECT OF RECOMMENDED ACTION

The purpose and effect of the recommended action is to permit the establishment of a Group Home (Type 2) within an existing single detached dwelling on the subject property. The recommended amendment will also permit single detached residential dwellings. This recommendation is the same as was presented at the April 8, 2014 public participation meeting before the Planning and Environment Committee but has been substantiated by a further review of the intensity, on-site parking and private amenity space.

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RATIONALE

- i) The recommended amendments are consistent with the policies of the *Provincial Policy Statement (PPS), 2014*, which promote redevelopment in order to minimize land consumption and servicing costs, encourage facilitating all forms of housing required to meet the social, health and well-being requirements of current and future residents including special needs requirements, seek to ensure that necessary public service facilities are available to meet current and projected needs, and promote adaptive re-use of existing building stock in providing for new public service facilities;
- ii) The recommended amendment is supported by the objectives of the City of London Official Plan which encourage the development, at appropriate locations, of residential facilities that meet the housing needs of persons requiring specialized care;
- iii) The subject property is located along an arterial road, on a corner lot at the periphery of a low density residential neighbourhood, directly adjacent to a major shopping centre with access to public transit services, and within 600 metres of significant public open space and recreational facilities; and
- iv) The proposed Group Home Type 2 does not contemplate any exterior alterations to the existing single-storey detached dwelling, contains the same restrictions on the intensity of the proposed use (8 residents + Staff) as the existing Group Home Type 1 operation which is permitted as-of-right on the subject lands, can accommodate on-site parking in excess of the requirements of the Zoning By-law Z.-1, can accommodate approximately 90m² of outdoor amenity space in the rear yard, is not located in proximity to other Group Home facilities and, given the foregoing, is not anticipated to present any adverse impacts to the surrounding neighbourhood or its character.

BACKGROUND

On December 10, 2013, the City received a complete application for an Official Plan and Zoning By-law amendment from St. Leonard's Community Services intended to facilitate the establishment of a Group Home Type 2 within an existing single detached dwelling located at 313 Clarke Road.

Group Home Type 2 Definition:

"GROUP HOME TYPE 2" means a residence for the accommodation of up to eight persons, excluding staff, that is maintained and operated primarily for: persons who have been placed on probation or released on parole under provincial or federal statute; or youth who have been charged under provincial or federal statute and who have been placed in detention or custody. A Group Home Type 2 may include a Group Home Type 1, a Supervised Residence, and an Emergency Care Establishment for children or youth.

Subsequent to the public notification and circulation process for this application, Planning Staff received a number of expressions of concern related to the proposed Official Plan and Zoning By-law amendments, with the most common concerns relating to the intensity of the proposed use and potential neighbourhood impacts stemming from a perceived lack of functional on-site private outdoor amenity space and a lack of on-site parking.

On April 8, 2014 Planning Staff presented a report to the Planning and Environment Committee which recommended approval of the St. Leonards' Community Services application to allow for a Group Home Type 2 within the existing dwelling at 313 Clarke Road. The Official Plan and Zoning By-law amendments recommended by Staff included special restrictions which would prohibit exterior additions to the existing dwelling to ensure that the built form remained compatible with the character of the neighbourhood, and restrict the establishment of a

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Supervised Residence within the Group Home Type 2 to ensure that no more than eight (8) residents, regardless of background, could occupy the facility. The recommendation for approval of the by-laws presented in the April 8, 2014 Staff report was rationalized as follows:

- i) *The recommended amendments are consistent with the policies of the Provincial Policy Statement (PPS), 2005, which promote redevelopment in order to minimize land consumption and servicing costs, encourage facilitating all forms of housing required to meet the social, health and well-being requirements of current and future residents including special needs requirements, and seek to ensure that necessary public service facilities are available to meet current and projected needs;*
- ii) *The recommended amendment is supported by the objectives of the City of London Official Plan which encourage the development, at appropriate locations, of residential facilities that meet the housing needs of persons requiring specialized care;*
- iii) *The subject property is located along an arterial road, on a corner lot at the periphery of a low density residential neighbourhood, directly adjacent to a major shopping centre with access to public transit services, and within 600 metres of significant public open space and recreational facilities; and*
- iv) *The proposed Group Home Type 2 does not contemplate any exterior alterations to the existing single-storey detached dwelling, contains the same restrictions on the intensity of the proposed use (8 residents + Staff) as the existing Group Home Type 1 operation which is permitted as-of-right on the subject lands, can accommodate on-site parking in excess of the requirements of the Zoning By-law Z.-1, can accommodate approximately 100m² of outdoor amenity space in the rear yard, is not located in proximity to other Group Home facilities and, given the foregoing, is not anticipated to present any adverse impacts to the surrounding neighbourhood.*

At the April 8, 2014 public participation meeting, a number of oral submissions were presented to the Planning and Environment Committee by neighbours that built upon the written comments received during the application review process. The bulk of public concerns continued to focus on the intensity of the proposed use and potential neighbourhood impacts resulting from a perceived lack of functional private on-site amenity space and a perceived lack of on-site parking. On April 15, 2014 Municipal Council adopted the following resolution relating to the application by St. Leonard’s Community Services:

That, the application of St. Leonard’s Community Services, relating to the property located at 313 Clarke Road BE REFERRED back to the Civic Administration to report back at a future meeting of the Planning and Environment Committee, with respect to the following:

- a) *a reduction of the maximum number of occupants to four or five, with the appropriate staffing levels;*
- b) *a further review of the amenity space; and,*
- c) *a further review of the number of parking spaces required;*

ANALYSIS

Provincial Policy Statement, 2014

Since this application was last considered by Municipal Council on April 15, 2014, a new Provincial Policy Statement has come into effect. The *Provincial Policy Statement, 2014* (PPS) provides policy direction on matters of provincial interest related to land use planning and development. Section 3 of the *Planning Act* requires that decisions of any authority affecting

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planning matters “shall be consistent” with the PPS.

As it relates to this application by St. Leonard’s Community Services, Section 1.1.1 of the PPS directs that *Healthy, Liveable and Safe communities are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the Province and its municipalities over the long term, promoting cost-effective development standards to minimize land consumption and servicing costs and ensuring that necessary public service facilities are available to meet current and projected needs.* In this regard, the recommended amendments will facilitate the conversion of an existing detached dwelling from a Group Home Type 1 to a Group Home Type 2 to provide for a community based residential care facility which can be serviced by existing municipal services and infrastructure.

Further, Subsection 1.4 provides direction on matters of provincial interest related to housing. The policies of Section 1.4 require planning authorities to provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the regional market area, in part, by *permitting and facilitating all forms of housing required to meet the social, health and well-being requirements of current and future residents, including special needs requirements.* In this regard, the recommended amendments will facilitate the conversion of an existing detached dwelling to a Group Home (Type 2). The proposed Group Home (Type 2) would allow for the accommodation of up to eight (8) persons involved in the criminal justice system in supervised group living environment with on-site access to social services and supportive counselling to assist residents with transition and integration back into their communities. The proposed operation will be funded, licensed and regulated by ministries of the provincial and federal government. This type of housing caters to a special needs segment of the population.

Finally, Section 1.6 of the PPS directs that public service facilities shall be provided in an efficient and cost-effective manner to accommodate projected needs. Specifically, new policy direction provided by Section 1.6.3 b) of the PPS provides that before consideration is given to the development of new public service facilities, *opportunities for adaptive re-use should be considered, where feasible.* The recommended amendments will facilitate the establishment of a Group Home (Type 2) within an existing detached dwelling which can be effectively serviced by existing municipal services and infrastructure. The redevelopment of an existing dwelling to accommodate the proposed use is cost-effective from the public perspective and supported by the objectives of the new PPS, 2014.

Consultation with Applicant:

As a result of Municipal Council’s April 15, 2014 resolution regarding the proposed Official Plan and Zoning By-law amendment application, Planning Staff have conducted further consultation with the St. Leonard’s representatives to explore the extent to which they may be willing to modify their application in view of Council’s concerns. The applicants have prepared a formal response to the items for consideration noted in the Council resolution. St. Leonard’s formal response is dated May 6, 2014 and attached as Appendix “C” to this report for further reference. In general, the applicants contend that a reduced residency requirement compromises the viability of the proposed operation and program, and the planning justification report provided by Knutson Development Consultants and the April 8, 2014 Staff report demonstrate the previously recommended amendments represent sound land use planning. As such, the applicants are unwilling to amend/modify the application in light of the Council resolution and have requested that a decision be made with respect to the application, as originally presented.

Further Staff Review:

Subsequent to the April 15, 2014 Council resolution noted previously throughout this report, Planning Staff have conducted further analysis of the appropriateness of the intensity of the proposed use, with specific regard for on-site private amenity space and on-site parking. The

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following analysis is intended to supplement the previous Planning Impact Analysis and policy evaluation provided by the April 8, 2014 Staff Report:

Intensity:

The St. Leonard's application proposes to establish a Group Home Type 2 within an existing dwelling on the subject property. As noted in the April 8, 2014 Staff report, the existing dwelling at 313 Clarke Road has been previously renovated to accommodate a Group Home Type 1 which, under the Zoning By-law, can legally provide for the accommodation of up to 8 special needs individuals and related staff.

The April 8, 2014 Staff recommendation includes restrictions on the use of 313 Clarke Road to ensure that no more than 8 residents could populate the new facility. Therefore, the recommended amendment maintains the same level of intensity as is currently permitted as-of-right on the subject property. Staff have conducted a further review of Zoning By-law Z.-1 to determine if additional objective indicators are available to evaluate the appropriateness of the recommended intensity given the perceived lack of dwelling size.

In this regard, the siting criteria for Group Home Type 1's do provide minimum floor space requirements on a per resident basis to determine the appropriate intensity of residents based on the size of a dwelling. Given the similarity in the nature of Group Home Type 1's and Group Home Type 2's, it is reasonable to use this measure to assist in the evaluation of the St. Leonard's application which would allow for a maximum of 8 residents + Staff.

4.8 GROUP HOMES

Notwithstanding any other provision of this By-law to the contrary, a Group Home Type 1 is permitted to occupy the whole of an individual dwelling unit, other than dwelling units located within areas designated as Agriculture in the Official Plan, including a single detached dwelling, a semi-detached dwelling, a duplex dwelling, and a triplex dwelling provided the total number of residents within the building structure does not exceed eight, and there is no Group Home or Emergency Care Establishment within 250.0 metres (820 ft.) of the proposed facility in any one direction. The dwelling must have 20.0 square metres (216 sq. ft.) of gross floor area per person residing within the unit. [Emphasis Added]

As noted, the previously recommended amendments would have restricted the Group Home Type 2 to eight (8) residents. Using the minimum gross floor area requirements in Section 4.8 of the Zoning By-law guiding the establishment of Group Home Type 1's, the dwelling would require a minimum of 160.0 square metres (1722 square feet) of gross floor area to accommodate eight (8) residents. The existing dwelling at 313 Clarke Road includes 239.0m² of gross floor area on the ground floor and a further 239.0m² of floor area within a habitable basement. The total gross floor area of the existing dwelling is approximately 478.0 m² (5,060 ft²). This is approximately three times larger than what is required by the Zoning By-law in order to establish a group home for the accommodation of eight (8) residents.

No additional indicators were uncovered through Staff's subsequent analysis which would provide a planning rationale to change the original recommendation by limiting the intensity to 4 or 5 residents.

Amenity Space:

There are limited objective standards available to evaluate the sufficiency of on-site private amenity space for a given land use. The Zoning By-law does not explicitly require a minimum "amenity space". However, the Zoning By-law does contain regulations for the minimum amount of landscaped open space, and minimum rear yard setbacks for specific uses based on the zone variation. The Community Facility (CF5) Zone variation is used to regulate the development/establishment of Group Home Type 2 facilities across the City. Group Home Type 2's are the only permitted use within the CF5 Zone variation and, as such, the regulations of this

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Zone provide the most appropriate framework to guide decisions on the sufficiency of various elements of the site. With regard to amenity space, the standards outlined in the chart below bear the most relevance.

Community Facility Zone		
CF5 Variation	Required	Proposed
Permitted Uses	Group Home Type 2	Group Home Type 2
Rear Yard	10m	10.03
Landscaped Open space	25%	32%

As noted in the above chart, the Group Home proposed by St. Leonard's can meet the applicable Zone standards with regard to these items. As such, the subject site can accommodate the level of intensity proposed by this application.

Parking:

As noted in the April 8, 2014 Planning Staff report, Section 4.19 of Zoning By-law Z.-1 provides standards for parking based on the nature of the use. Section 4.19 specifically defines parking requirements for each permitted use in the by-law in relation to a site's proximity to the Downtown core. Parking requirements in the by-law are based on the anticipated need determined by comprehensive studies of historical usage for specific land uses. The standards for group homes in "Parking Standard Area 3" are clear in that a minimum of two (2) spaces are required. Staff have also reviewed parking requirements for uses which are similar in nature to Group Homes to determine if additional guidance is available. The most similar alternative use defined in the Zoning By-law is referred to as a Supervised Residence. A Supervised Residence is defined as:

"SUPERVISED RESIDENCE" means a Group Home Type 1 with more than eight residents, excluding staff or the receiving family.

Parking Area 3 Standards	
Use	Required Parking
Group Homes (Type 1 or 2)	2 spaces
Supervised Residences	1 per 4 residents

As evident by the chart above, it is clear that Zoning By-law Z.-1 sets the standards for parking for group homes and supervised residences based on a ratio of 1 space per 4 residents. As the proposed facility at 313 Clarke Road would be capped at 8 residents, only 2 parking spaces are required. Based on the plan submitted by St. Leonard's the site can accommodate 3 parking spaces thereby exceeding the minimum standards required by the Zoning By-law.

There are no further objective standards provided in Zoning By-law Z.-1 which would provide a planning rationale to change the recommendation to limit the intensity to 4 or 5 residents nor suggest that the previously recommended 8 residents is too intense based on parking supply.

CONCLUSION

Staff have conducted further consultation in view of items for consideration outlined the April 15, 2014 Council resolution. As per the formal response from St. Leonard's attached as Appendix "C" to this report, the applicants have elected not to modify their application on this basis. Further, Staff have conducted a supplemental planning evaluation with specific regard for the items noted in the April 15, 2014 Council resolution and the policies of the new Provincial Policy Statement, 2014. As a result of further consultation and supplemental planning evaluation, Staff are unable to recommend a by-law to provide for the reduced intensity of 4 or 5 residents. The applicants have not elected to modify their application in view of the April 15, 2014 Council Resolution, and no new information has been uncovered which would justify changing the

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previous recommendation.

PREPARED BY:	SUBMITTED BY:
MIKE DAVIS, B.U.R.PI. PLANNER II, CURRENT PLANNING	MICHAEL TOMAZINCIC, MCIP, RPP MANAGER, CURRENT PLANNING
RECOMMENDED BY:	
JOHN M. FLEMING, MCIP, RPP MANAGING DIRECTOR, PLANNING AND CITY PLANNER	

May 16, 2014
Mike Davis
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Planner: Mike Davis

Appendix "A"

Bill No. (number to be inserted by Clerk's Office)
2014

By-law No. C.P.-1284-_____

A by-law to amend the Official Plan for the City of London, 1989 relating to 313 Clarke Road.

The Municipal Council of The Corporation of the City of London enacts as follows:

1. Amendment No. (to be inserted by Clerk's Office) to the Official Plan for the City of London Planning Area – 1989, as contained in the text attached hereto and forming part of this by-law, is adopted.
2. This by-law shall come into effect in accordance with subsection 17(38) of the *Planning Act, R.S.O. 1990, c.P.13.*

PASSED in Open Council on June 10, 2014.

Joe Fontana
Mayor

Catharine Saunders
City Clerk

First Reading – June 10, 2014
Second Reading – June 10, 2014
Third Reading – June 10, 2014

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**File: OZ-8300
Planner: Mike Davis**

AMENDMENT NO.

to the

OFFICIAL PLAN FOR THE CITY OF LONDON

A. PURPOSE OF THIS AMENDMENT

The purpose of this Amendment is to add a policy in Section 10 – Policies for Specific Areas of the Official Plan for the City of London to permit a Group Home Type 2 (Correctional Residence) within the Low Density Residential designation on the subject lands.

B. LOCATION OF THIS AMENDMENT

This Amendment applies to lands located at 313 Clarke Road in the City of London.

C. BASIS OF THE AMENDMENT

This Amendment will facilitate the adaptive reuse of an existing dwelling to a Group Home Type 2 in order to minimize land consumption and servicing costs, allow for the development of specialized housing required to meet the social, health and well-being requirements of current and future residents including special needs requirements, and contribute to ensuring that necessary public service facilities are available to meet current and projected needs.

D. THE AMENDMENT

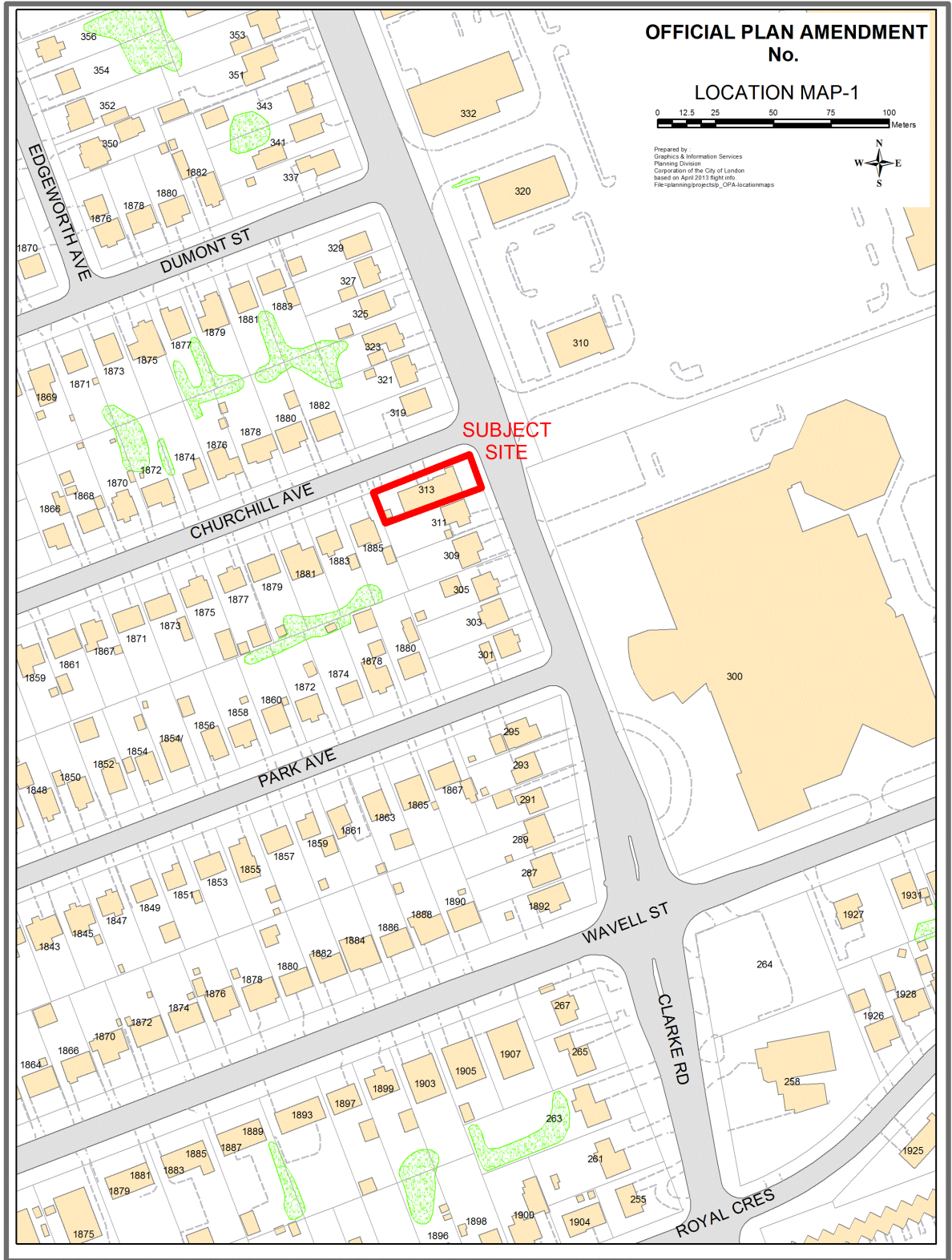
Section 10 – Policies for Specific Areas of the Official Plan for the City of London is amended by adding the following:

10.1.3 Specific Areas:

- 313 Clarke Road _) In the Low Density Residential Designation at 313 Clarke Road, in addition to the uses permitted in the Low Density Residential Designation, a Group Home Type 2 may also be permitted in order to allow for the establishment of a Correctional Residence.

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Planner: Mike Davis



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**File: OZ-8300
Planner: Mike Davis**

Appendix "B"

Bill No. (number to be inserted by Clerk's Office)
2014

By-law No. Z.-1-14_____

A by-law to amend By-law No. Z.-1 to rezone an area of land located at 313 Clarke Road.

WHEREAS St. Leonard's Community Services has applied to rezone an area of land located at 313 Clarke Road, as shown on the map attached to this by-law, as set out below;

AND WHEREAS upon approval of Official Plan Amendment Number (number to be inserted by Clerk's Office) this rezoning will conform to the Official Plan;

THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

- 1) Schedule "A" to By-law No. Z.-1 is amended by changing the zoning applicable to lands located at 313 Clarke Road, as shown on the attached map comprising part of Key Map No. A108, from a Residential R1 (R1-7) Zone to a Residential R1/Community Facility Special Provision (R1-7/CF5(_)) Zone.
- 2) Section Number 32.4 of the Community Facility (CF5) Zone is amended by adding the following Special Provision:
 -) CF5(_) 313 Clarke Road
 - a) Permitted Use:
 - i) Group Home Type 2 in the dwelling as it existed at the time of the passing of the By-law. A Supervised Residence shall not be permitted.
 - b) Regulations:
 - ii) Notwithstanding the regulations contained in Table 32.3 – Regulations for CF Zone Variations - all regulations are as existing on the date of the passing of the By-law.

The inclusion in this By-law of imperial measure along with metric measure is for the purpose of convenience only and the metric measure governs in case of any discrepancy between the two measures.

This By-law shall come into force and be deemed to come into force in accordance with Section 34 of the *Planning Act, R.S.O. 1990, c. P13*, either upon the date of the passage of this by-law or as otherwise provided by the said section.

PASSED in Open Council on June 10, 2014.

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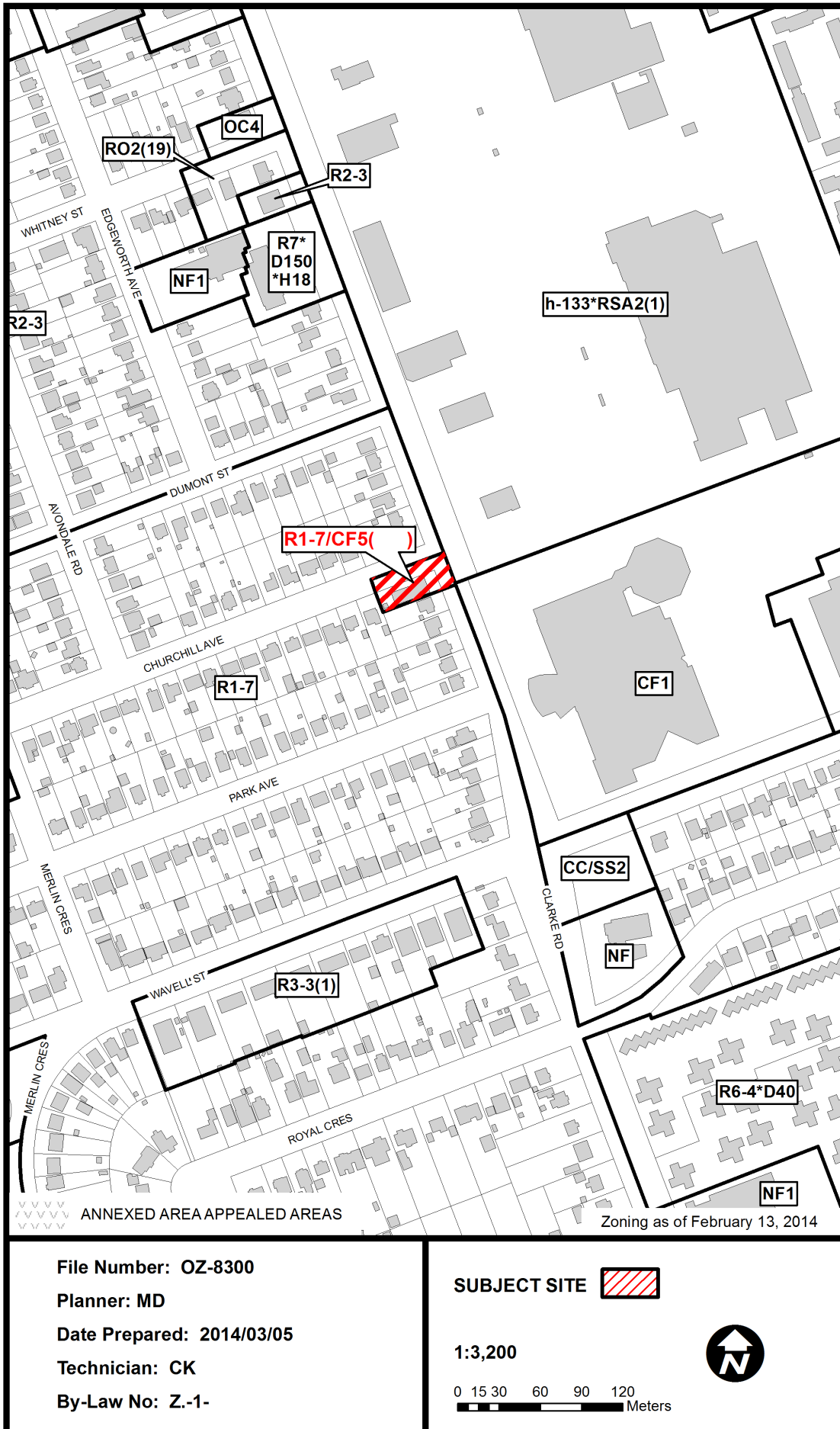
Joe Fontana
Mayor

Catharine Saunders
City Clerk


First Reading – June 10, 2014
Second Reading – June 10, 2014
Third Reading – June 10, 2014

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AMENDMENT TO SCHEDULE "A" (BY-LAW NO. Z.-1)




File Number: OZ-8300
 Planner: MD
 Date Prepared: 2014/03/05
 Technician: CK
 By-Law No: Z.-1-

SUBJECT SITE 

1:3,200

0 15 30 60 90 120 Meters

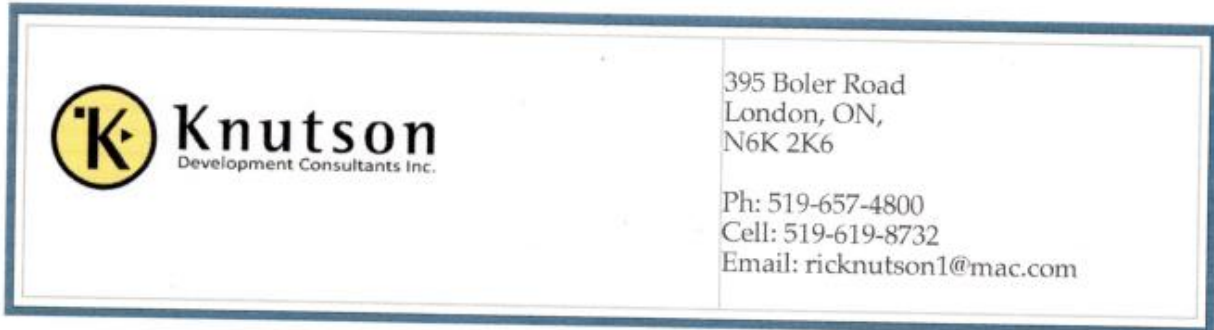


Geodatabase

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File: OZ-8300
Planner: Mike Davis

Appendix "C"



May 6, 2014

Corporation of the City of London
300 Dufferin Ave.
London, On, N6A 4L9

Attn: Joni Baechler, Chair of Planning and Environment Committee
Re: Official Plan and Zoning amendment applications: 313 Clarke Road
VIA HAND DELIVERED and email

Dear Chair Baechler and Committee;

At the Planning and Environment Committee hearing April 8, 2014, the Committee passed a resolution deferring consideration of the application and asked us to pay particular attention to a variety of issues that were raised. Since then I have met with Mr. Davis, as well as corresponded with him via email plus a number of telephone conversations regarding the above captioned.

The By-law is very clear in that Group Homes whether type 1 or type 2 have a limit of 8 residents plus staff. The St. Leonard's program requirements are for 8 beds contracted for by Corrections Canada, The Ontario Ministry of Correctional Services and the Ministry of Health and Long Term Care. The current facility could house 8 residents and staff. Unfortunately a reduction to 4 or 5 residents is beyond any objective standards and will not fill the needs of St. Leonard's.

The current house provides for 3 private bedrooms, one double bedroom and a large suite (apartment) designed for a special need resident. That large space is easily repurposed to 3 bedrooms and conversion of the double to 2 singles and leave sufficient common rooms for recreation, kitchen, dining and bathing facilities.

The resolution requested attention to 2 measures that Committee felt were inadequate namely the amenity area and parking.

Relative to parking, By-law Z-1 requires 2 parking spaces for a group home whether type 1 or type 2. There are no special regulations or other standards that we could discover. The site plan as presented to the Committee shows 3 parking spaces.

As to the amenity space, there is no requirement for an amenity area beyond providing landscaped open space (los). The application identified los on the site, net of any parking area, in conformity with the By-law regulations of 25% in the CF-5 Zone. With the addition of 81 sq. M. of courtyard exclusive amenity area with gazebo, benches etc., and the los provided increases to in excess of 50%.

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In summary, the site is capable of housing 8 residents in individual bedrooms plus the necessary living amenity spaces. The dedicated amenity space is equivalent of having a deck that measures 30 feet by 30 feet. The provision of 3 parking spaces is beyond the standard required in By-law Z-1.

I have attached a measured plan that shows the various elements of the site.

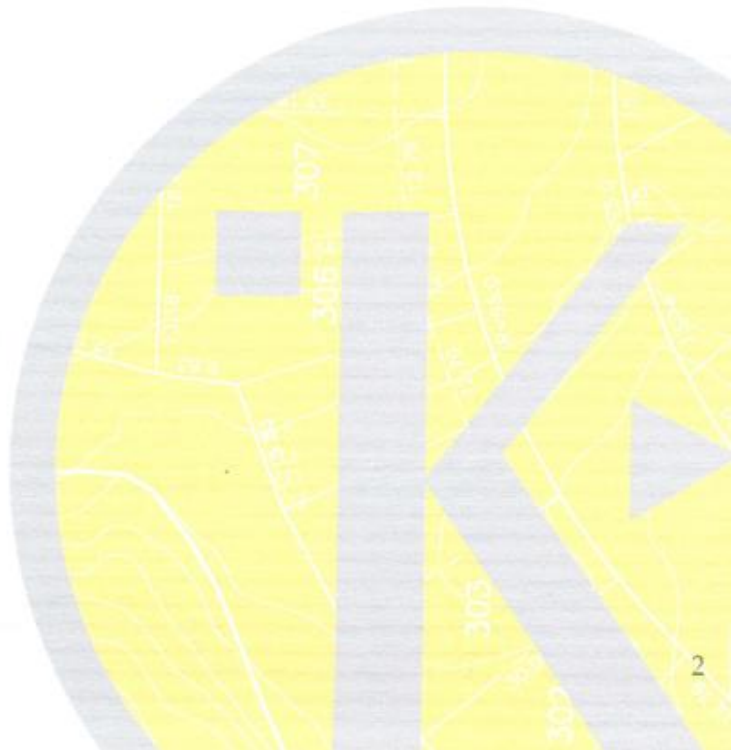
There is urgency in this matter being decided and we respectfully request that it be returned to the Committee at the earliest possible date. We agree fully with the By-law as presented to you in the April 8 staff report.

Best regards
Knutson Development Consultants Inc.



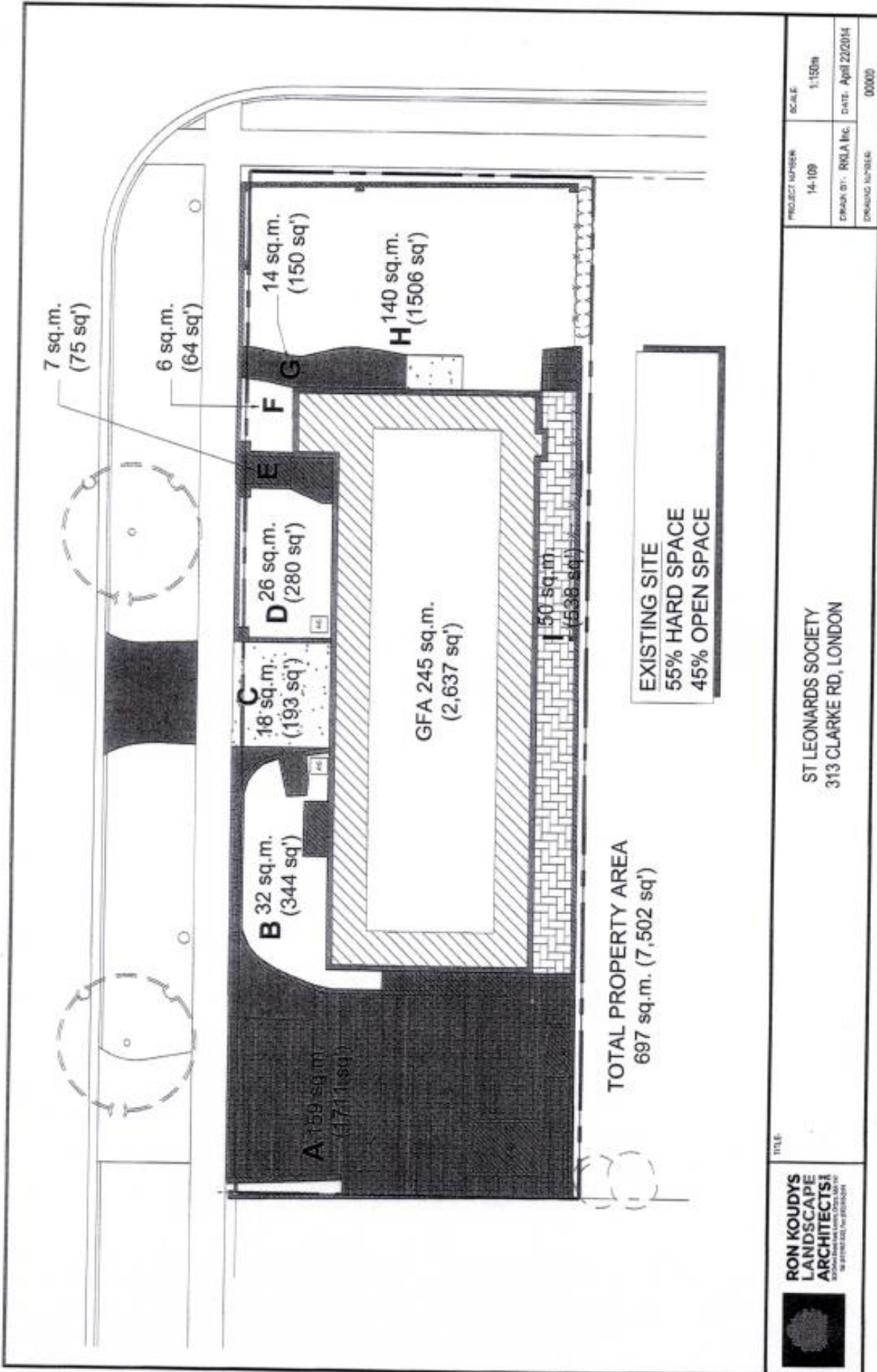
Ric Knutson

- Cc. Client (Via email)
- Mike Davis (via email)
- Heather Lysynski (Committee Secretary) (via email)
- Alan Patton (via email)



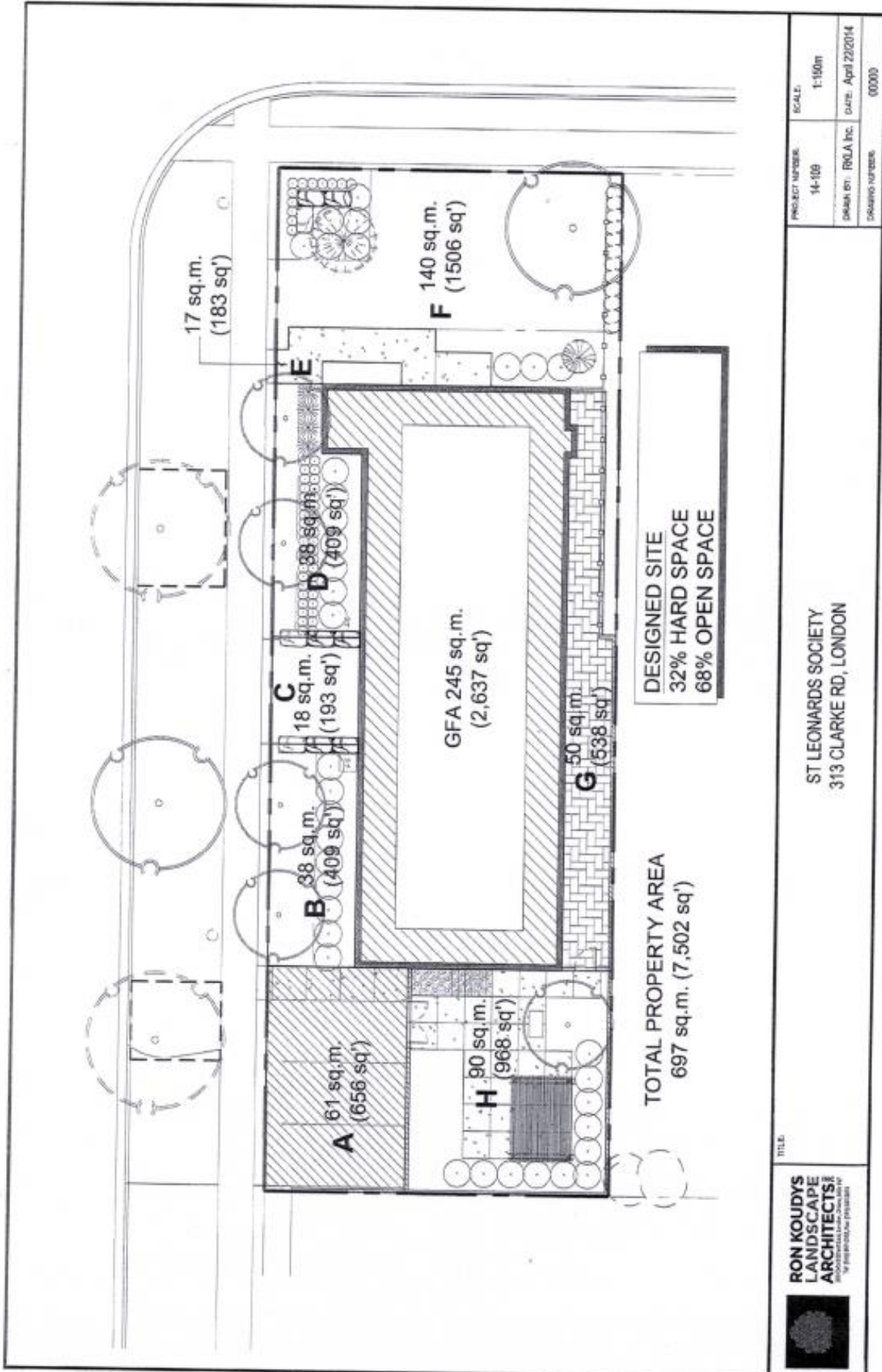
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 Planner: Mike Davis



<p>RON KOUUDYS LANDSCAPE ARCHITECTS <small>INCORPORATED IN THE STATE OF CALIFORNIA</small></p>	<p>TITLE:</p>
	<p>ST LEONARDS SOCIETY 313 CLARKE RD, LONDON</p>
<p>PROJECT NUMBER: 14-09</p>	<p>SCALE: 1:150m</p>
<p>DRAWN BY: ROLA INC.</p>	<p>DATE: April 22/2014</p>
<p>DRAWING NUMBER: 00000</p>	