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<b>TO:</b>	<b>CHAIR AND MEMBERS PLANNING &amp; ENVIRONMENT COMMITTEE</b>
<b>FROM:</b>	<b>JOHN M. FLEMING MANAGING DIRECTOR, PLANNING AND CITY PLANNER</b>
<b>SUBJECT:</b>	<b>INFORMATION REPORT REVIEW OF INTENSIFICATION TARGETS IN THE LONDON PLAN MEETING ON MONDAY, DECEMBER 14, 2015</b>

<b>RECOMMENDATION</b>
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That, on the recommendation of the Managing Director, Planning and City Planner, the following actions be taken:

- (a) The following report **BE RECEIVED** for information,
- (b) No further actions **BE TAKEN** to revise the 40% intensification target identified in The London Plan, and
- (c) An additional intensification target **BE ADDED** to The London Plan, seeking that 75% of all intensification be located within the Primary Transit Area.

<b>BACKGROUND</b>
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On June 22 & 24, 2015 a public participation meeting was held to review the Second Draft of the London Plan. At this meeting a motion was passed to receive the Second Draft and schedule a public participation meeting to adopt The London Plan. The motion also included:

*That the Civic Administration BE DIRECTED to report back to the Planning and Environment Committee, prior to the consideration of future revisions of the London Plan, with respect to the potential impact of revised intensification targets on the policies contained within the London Plan, including information and a breakdown of the proposed housing mix of such intensification and the location(s) of the intensification*

This report includes information regarding the appropriateness of the current intensification target and the potential impacts of alternative intensification targets in The London Plan.

<b>WHAT ARE INTENSIFICATION TARGETS</b>
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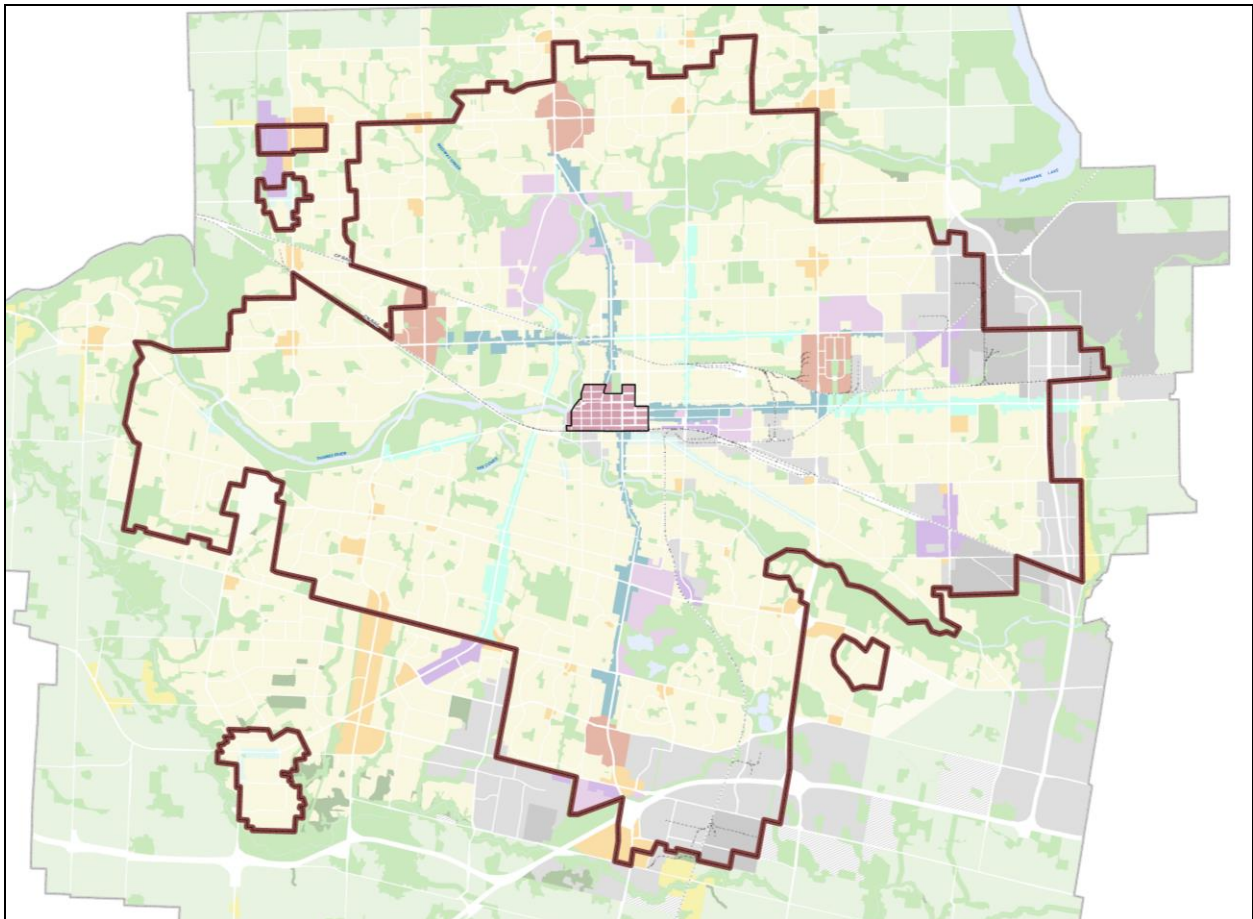
Intensification is one of the primary objectives of The London Plan, and ensuring a minimum level of intensification is critical to achieving the Plan’s vision to grow the city “inward and upward.” The inclusion of an intensification target in The London Plan provides a measurable benchmark that can be applied to test whether the policies of the Plan are having the intended consequence of directing development into the existing built-up area. The London Plan makes explicit connections between land use and street types, and the policies of the Plan direct the most intensive growth to Downtown, the Transit Villages, and the Rapid Transit Corridors.

Residential intensification is defined in the Second Draft of The London Plan as “The development of a property, site, or area at a higher density than currently exists.” An intensification target is defined as “The desired percentage of all new residential units

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that will be created within the Built-Area Boundary.” The Built-Area Boundary includes lands that were built up as of January, 2006 and is depicted in Figure 1. This year is used for the purpose of the intensification target as it coincides with the passing of the Growth Plan for the Greater Golden Horseshoe and is consistent with growth calculations applied in other Ontario municipalities. Maintaining this consistent approach allows us to compare London’s progress with other cities and learn from their experience if intensification levels vary. The Built-Area Boundary will remain fixed for the planning horizon for The London Plan, so as to provide a consistent measure of intensification. The intensification target included in the Second Draft of The London Plan is 40%.



**Figure 1 – The London Plan Place Types & Built-Area Boundary**

Intensification targets can be met in a variety of ways, including redevelopment of existing residential areas at higher densities, development of vacant sites within the built-up area, and conversion of former industrial sites or other non-residential areas to residential uses. Intensification targets do not preclude greenfield development as a viable form of growth, but recognize that as the City grows a gradual intensification of the core and other specified areas is desirable.

The following sections provide information on intensification trends in London and how those trends may change over time as a result of The London Plan. The objective of this exercise is to confirm that the 40% intensification target is achievable and appropriate, and will establish a benchmark that will move the city towards more sustainable forms of development that align with the vision established in The London Plan.

**HOW INTENSIFICATION TARGETS ARE USED**

It is important to understand the purpose of an intensification target in the Official Plan. In some cases, it has been confused as a regulatory tool – to be applied in some

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way to restrict development within suburban locations or to require that development be directed to the interior portions of the city. This is not the intent of an intensification target. The policies of the London Plan, including the Place Type policies that establish permitted uses and intensities, and how they are applied geographically throughout the city, are the drivers of intensification from a policy perspective. The target simply is the tool used to measure the effectiveness of these policies in meeting a desired level of intensification. It is the “bar” by which The London Plan and its policies regarding intensification are to be measured.

It is also important to understand the role that the development market plays relative to intensification targets. Policy efforts to support intensification cannot be successful if they are fundamentally contrary to long-term market trends. Policies must work within the context of what the housing market is currently demanding and how that demand may shift in the future. Furthermore, policies and program strategies must consider not just the regulatory perspective – what heights and intensities are not permitted in certain locations – but must also consider how to encourage and facilitate greater height and intensity within those locations where it is desired. This can be accomplished by allowing for greater heights and intensities within strategic locations, by allowing more flexibility for intensification (eg: secondary suites) and offering public services and amenities that heighten the market demand for such development. The provision of rapid transit is a good example of a public service that can generate greater demand for higher density forms of housing at stations and along transit lines within the core area. The provision of quality urban parks and civic spaces within the core area is another step that the City can take to encourage the market for housing forms that represent infill and intensification. Improvements to the Downtown and other urban environments (eg. Back to the River, South Street redevelopment, and Queens Park improvements) can also lead to heightened demand for housing in the core area.

Recognizing this, intensification targets are useful to measure the effectiveness of policies and programs that have been designed to support intensification, and the higher goals of developing a more compact, mixed use city. Setting realistic, but ambitious, targets is important so that they can be used with confidence to assess the success of The London Plan in meeting these goals. Measuring this success every other year will be a central part of The London Plan’s monitoring reports.

<b>PROVINCIAL POLICIES</b>
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The Provincial Policy Statement (PPS, 2014) provides policy direction on matters related to planning and development that are of Provincial interest. The PPS is authorized by Section 3 of the *Planning Act*, which requires that any municipal decision on a planning matter shall be consistent with the PPS.

The PPS identifies intensification as important to achieving healthy, liveable, and safe communities. It requires municipalities to identify appropriate locations and promote opportunities for intensification (Section 1.1.3.3). Intensification targets are required in every municipality by the PPS, which states that “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” (Section 1.1.3.5). The Province has not passed any provincial plans for the London area, so it is the responsibility of Council to establish an appropriate intensification target for the City of London.

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**OTHER INTENSIFICATION TARGETS IN ONTARIO**

While the PPS does not specify what may be an appropriate intensification target for any municipality, it has become standard practice in major urban regions in Ontario to apply an intensification target of 40%. This is the required minimum target in the Growth Plan for the Greater Golden Horseshoe and has also been adopted by other municipalities. Table 1 below provides a summary of intensification targets adopted by selected upper or single-tier municipalities in Ontario:

**Table 1 – Intensification Targets in Select Upper and Single-Tier Municipalities in Ontario**

Municipality	Intensification Target in Official Plan
Municipality of Chatham-Kent*	10%
City of Greater Sudbury	10%
Middlesex County	15%
Norfolk County	20%
County of Simcoe	32%
City of Barrie <sup>+</sup>	40%
Region of Durham <sup>+</sup>	40%
City of Guelph <sup>+</sup>	40%
Region of Halton <sup>+</sup>	40%
City of Hamilton <sup>+</sup>	40%
City of Kingston*	40%
Region of Niagara <sup>+</sup>	40%
Region of Peel <sup>+</sup>	40%
City of Peterborough <sup>+</sup>	40%
Region of York <sup>+</sup>	40%
City of Ottawa*	38% in 2012-2016 40% in 2017-2021 42% in 2022-2026 44% in 2027-2031
Region of Waterloo <sup>+</sup>	45%

\*Official Plans pending approval

<sup>+</sup>Subject to the 40% minimum target in the Growth Plan for the Greater Golden Horseshoe

While the majority of cities have adopted intensification targets of 40%, Table 1 includes two municipalities with higher targets including the Region of Waterloo and City of Ottawa. Other municipalities, such as the cities of Toronto and Mississauga, are completely built out, so any development within their boundaries is considered intensification according to the PPS.

The Region of Waterloo has implemented an intensification target of 45%, exceeding the minimum requirement in the Growth Plan by 5%. This target was determined through the Region’s land budget prepared in 2009. That report explains that because the Region is located within the Growth Plan area, there are minimum density requirements for greenfield development. The Region of Waterloo is unable to achieve the minimum greenfield densities for various reasons, but by increasing its intensification target by 5% the need for outward growth is equalized, producing the same net effect on the need for urban expansion. The higher intensification target for the Region or Waterloo is not indicative of a desire to exceed the minimum requirement; rather it constitutes a density transfer to allow for lower density greenfield development. The cumulative effect of this density transfer is equivalent to a 40% intensification target as applied in The London Plan.

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The City of Ottawa completed a similar review in its report *Residential Land Strategy for Ottawa: 2006-2031*. Ottawa examined development trends and forecasts to come up with a phased intensification target that begins in 2012 at 38% and ends up at 44% by 2027, for an average intensification target of 41%. Ottawa’s intensification target requires a gradual shift in the housing market from ground-oriented dwellings (including single detached and townhouse dwellings), towards a greater share of apartment dwellings. The target recognizes that ground-oriented dwellings will remain the largest component of future residential development but it assumes that planning policies and initiatives will over time affect the housing splits. They anticipate that ground-oriented dwelling units will decrease from 77% of new dwellings in 2006-2011 to 67% in 2026-2031, and apartments will increase from 23% to 32% of new dwellings in the same time period.

<b>CURRENT INTENSIFICATION POLICIES</b>
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The current Official Plan includes intensification targets that are separated by dwelling type. The targets are 5% for low density forms (single and semi-detached dwellings), 25% for medium density forms (row housing), and 75% for high density forms (apartments). The current Official Plan also includes forecasts of future housing demand. Given the forecasted housing demand and targeted rate by housing form, the derived intensification target for all residential development is 23%. This rate is calculated by applying the intensification target for each form to the forecasted demand, and is shown in Table 2.

**Table 2 – Intensification Target in Current 1989 Official Plan (Section 2.5)**

	<b>Low Density</b>	<b>Medium Density</b>	<b>High Density</b>	<b>Total</b>
Intensification Target (%)	5%	25%	75%	
Housing Completion Forecast (2006-2026)	23,400	6,750	7,600	<b>37,750</b>
Intensification Target (#)	1,170	1,688	5,700	<b>8,558</b>
Overall Intensification Target				<b>23%</b>

The Official Plan includes policies that encourage intensification in order to achieve the current target, but it does not emphasize this objective to the same level as The London Plan. The planning principles in the current Plan include that “An Official Plan should enhance the character of residential areas and direct redevelopment and intensification activities to locations where existing land uses are not adversely affected” (Section 2.3.1.vi). The London Plan permits intensification in “appropriate locations and in a way that respects the existing neighbourhoods and represents a good fit” (Policy 87). The new Plan provides more opportunities for appropriate intensification throughout the city, but focuses intensification to specified nodes and corridors. The London Plan states that “Intensification may occur in all Place Types that allow for residential uses” (Policy 88). These policies indicate a change in mindset, where intensification is not viewed as a threat to existing neighbourhoods, but as an opportunity to improve the quality of existing urban areas if directed to appropriate locations, at appropriate levels of intensify, and in appropriate built forms. Given this shift in mindset it is fitting that a significant increase in the intensification target has been included in The London Plan.

<b>INTENSIFICATION TRENDS IN LONDON</b>
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Overall levels of Intensification are the product of two key variables: the housing splits and the locations of key developments (ie: inside or outside the Built-Area Boundary). Housing splits are the share of residential development occurring in high, medium, or low density housing forms. Table 3 includes past rates of intensification by housing form

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and the resulting overall intensification rate. The vast difference in the intensification rate between high and low density housing forms illustrates how intensification is driven largely by the housing split.

**Table 3 – Intensification Rate by Housing Form (Source: Planning Division)**

<b>Housing Form</b>	<b>2001-2006</b>	<b>2006-2011</b>	<b>2012-2014</b>
<b>Low Density</b>	5%	5%	5%
<b>Medium Density</b>	32%	24%	6%
<b>High Density</b>	75%	88%	73%
<b>Total</b>	<b>29%</b>	<b>36%</b>	<b>30%</b>

The low density form has only limited opportunities for intensification because most lands within the Built-Area Boundary have already been developed. Redevelopment is typically not feasible without a greater unit yield than what low density forms can offer. As a result, low-density intensification will remain low despite policy directions in The London Plan that favour intensification. In instances where low density intensification does occur, it usually consists of small scale redevelopment of individual lots, or in some instances the conversion of lands from a non-residential use. The 5% rate that was observed from 2001-2014 is likely to remain relatively constant as opportunities for low-density intensification will remain limited.

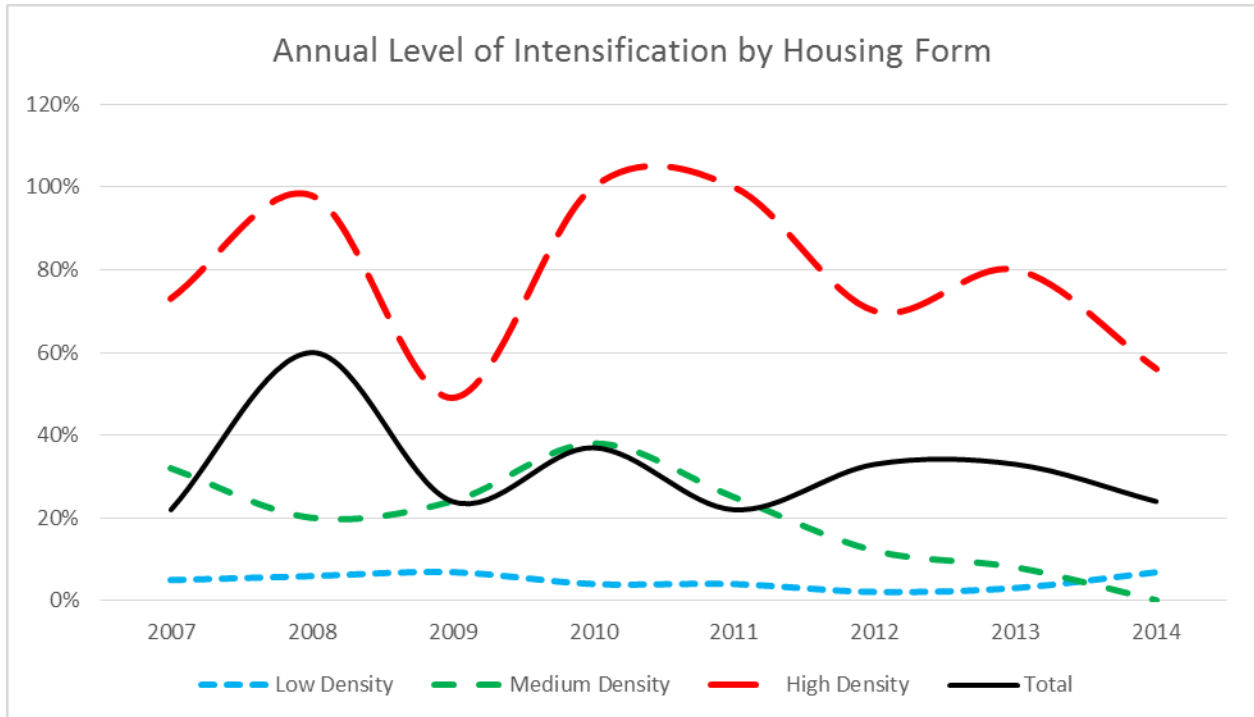
High density development is at the opposite end of the spectrum, occurring predominantly as intensification. This trend is likely to continue and may increase as a result of The London Plan’s policies that direct high density development to specified areas within the Built-Area Boundary.

Figure 2 shows the levels of intensification by housing form on an annual basis since 2007, and Figure 3 shows the proportion of dwelling units created in each housing form for the same time period. These graphs reiterate the vast difference in intensification level by housing form, but also makes it clear that high density development has the greatest impact on the City’s ability to meet its intensification target. In years where there is an increase in the share of development occurring as high density (2008, 2010, and 2012) there is a corresponding increase in the overall level of intensification.

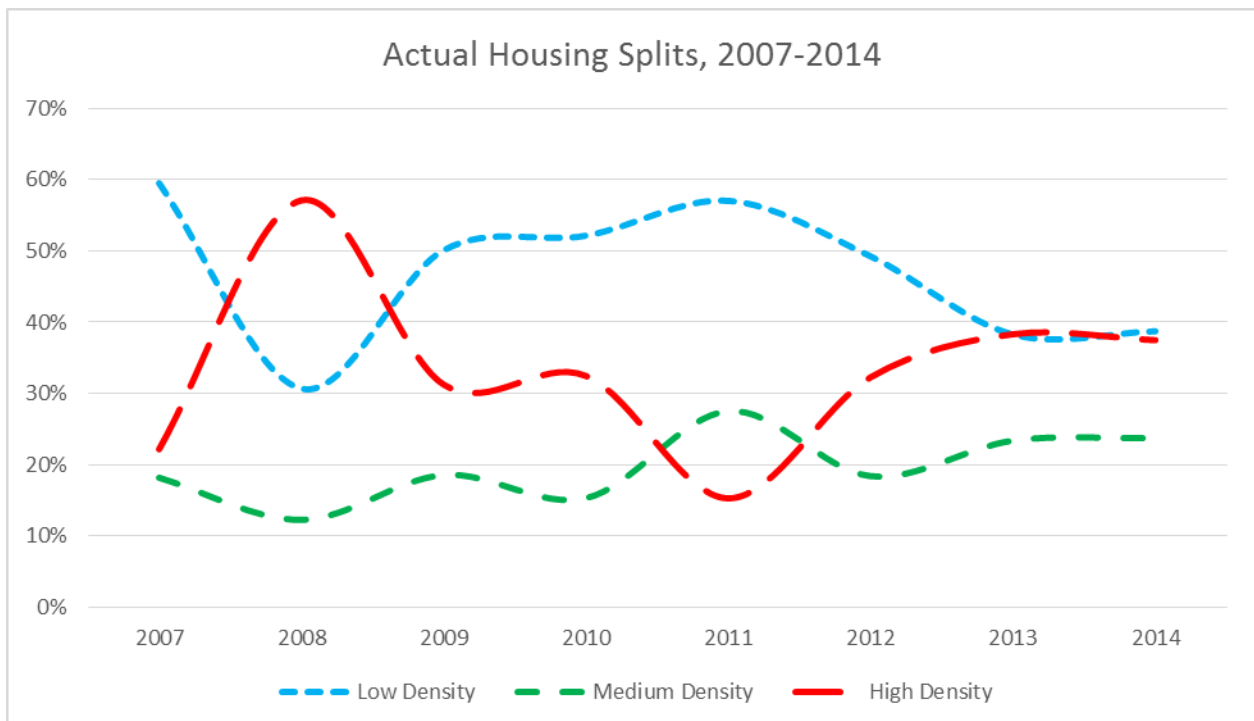
In 2011 the intensification rate for high density development is 100%; however, because there is a drop in the proportion of development occurring as high density, the overall level of intensification is lower than in all other years included in this analysis. In 2014 the proportion of high density residential development remained consistent with the previous year, but a decrease in the intensification rate of that form resulted in a drop in the overall level of intensification by 9%. This decrease is due largely to the development of two apartment buildings outside the built-area boundary, each containing 165 dwelling units (750-810 Capulet Lane & 315 Southdale Road). This outcome reinforces the importance of directing high density development inside the built-up area in order to achieve the intensification targets.

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J. Adema



**Figure 2 – Actual Intensification Rate by Housing Form, 2007-2014 (Source: Planning Division)**  
 Note: Values in excess of 100% are due to smoothing of the line.



**Figure 3 – Actual Housing Splits, 2007-2014 (Source: Planning Division)**

Medium density development is a smaller proportion of total residential growth in the City, and occupies the middle ground in terms of its intensification rate. Townhouses and other medium density residential forms are often incorporated into greenfield development proposals, though there may also be good opportunities for medium density intensification throughout the built area.

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<b>HOUSING SPLITS FORECAST AND INTENSIFICATION BY HOUSING FORM</b>
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Because of the impact of housing splits on intensification, forecasting these splits is critical to anticipating what intensification target is appropriate. Altus Group prepared forecasts as part of the background review for The London Plan in 2012. Their forecast relies on past trends but also takes into consideration such things as future demographic trends and associated housing preferences. Their forecast includes that the housing splits will remain relatively constant for the planning horizon of The London Plan. The Altus Group (2012) housing forecasts include that in 2016-2036, which constitutes the planning horizon for The London Plan, the housing split will include 54% low density residential, 16% medium density, and 30% high density. The observed housing splits from 2006-2014 were 45% low density, 19% medium density, and 36% high density.

Altus Group’s (2012) housing splits forecast does not account for the policies of The London Plan, which encourages inward and upward growth to a greater extent than the current Official Plan. Other planning initiatives, such as efforts to revitalize the downtown riverfront and the development of rapid transit, may also influence future development trends in London to include more intensification. Given the forecasted housing splits, and in consideration of past trends and the potential impact of planning initiatives, it is realistic to expect future housing splits to remain relatively consistent with what has been observed since 2006.

The Land Needs Background Study that was prepared during the ReThink London process included a target level of intensification for each housing form. This target was derived based on what would be required to achieve an overall intensification target of 40% given the housing splits. The targeted rate for each housing form is 7% intensification for low density development, 52% for medium density development, and 88% for high density development.

To achieve targeted levels of intensification for each housing form, the planning approach needs to focus on directing almost all of the high density development to inside the Built-Area Boundary and approximately half of the medium density development. These levels have not been achieved consistently in the 2006-2014 period; however, the London Plan provides a new policy framework with greater emphasis on opportunities for intensification.

Table 4 shows several hypothetical scenarios that would produce varying levels of intensification. It shows that while the housing splits have an impact on the overall level of intensification, the ability of planning policies and market forces to direct high and medium density development to the built-up area has the largest impact on achieving the intensification target. Two housing splits scenarios are included in the table, one includes the forecast splits in the Altus Group report for 2016-2036, and the other applies actual housing splits from 2006-2014. Various intensification rates are applied to these splits to see what intensification target could be achieved in each scenario. Rates of intensification included in this analysis are:

1. The actual intensification rates for 2006-2011, which are 5% of low density, 24% of medium density, and 88% of high density.
2. The actual intensification rates for 2012-2014, which are 4% of low density, 6% of medium density, and 68% high density.
3. The target intensification rate from the Land Needs Background Study, which are 7% of low density, 52% of medium density, and 88% of high density.



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**Table 4 – Alternate Housing Splits and Resulting Level of Intensification**

	Housing Splits			Resulting intensification based on:		
	Low Density	Medium Density	High Density	Actual rates 2006-2011	Actual rates 2012-2014	Target in Land Needs Study
<b>Altus Group Forecast</b>	54%	16%	30%	33%	23%	38%
<b>2006-2014 Average</b>	45%	19%	36%	38%	27%	45%

The greatest impact on overall intensification, and the variable able to be influenced by the policy approach, is the proportion of high and medium density located inside the Built-Area Boundary.

<b>OPPORTUNITIES AND THREATS FOR INTENSIFICATION</b>
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The London Plan includes significant policy support for intensification and infill development within the Built-Area Boundary. Direction #5 in the Our Strategy part of the Plan establishes that building a mixed-use and compact city is important to achieving a number of other goals. This focus is will reduce the need for outward growth, though the outward expansion of the city will not be stopped as that form of development is also important to accommodating projected population and employment growth.

The City Structure Plan identifies key nodes and corridors that will be the focus for intensification. These include Downtown London, the four Transit Villages, and the Rapid Transit Corridors. Other locations that can accommodate greater levels of intensification include Central London, the Primary Transit Area, and other Urban Corridors and Main Streets throughout the city. Within Neighbourhoods and other parts of the city that are not identified as focus areas for intensification, limited intensification may also be appropriate. A greater emphasis will be placed on ensuring an appropriate fit with the established character of these areas.

The London Plan encourages high density residential development as a primary land use in a variety of Place Types including Downtown, Transit Village, and Rapid Transit and Urban Corridors. Figure 1 illustrates that these locations are almost entirely within the established built-area boundary. High density residential uses may also be constructed in other place types but are not expected to be the primary land use, and as a result will not be developed in large quantities.

At the time of the writing of this report, Council is considering policies that will provide greater opportunity for secondary suites within existing housing. It is expected that this very “light” form of intensification will assist in supporting goals for more unit creation within the built area boundary. It will be important to monitor the impact that new secondary suites has on the percentage of intensification attributable to low density forms of housing, so that the assumptions underlying the intensification target can be adjusted, if necessary, accordingly.

A potential threat to achieving the minimum intensification target of 40% is the Remnant High Density Residential overlay designation as depicted on Map 2 of The London Plan. This designation permits high density residential development where it was permitted in the previous 1989 Official Plan for the City of London. These overlay designations represent opportunities for high density development that are not in accordance with the Place Type policies. There are total of 300 hectares in the Remnant High Density

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Residential overlay designation, of which 85 hectares are located outside the built-area boundary. Of those lands, 73.5 ha is currently vacant. The locations of the Remnant High Density Residential designation, relative the built-area boundary, is shown in Figure 4. If a signification proportion of the demand for high density residential development is absorbed by Remnant High Density Residential areas outside the Built-Area Boundary, an intensification rate of 40% cannot be achieved.

In addition to the Remnant High Density Residential designation, a lack of medium density residential development in the Built-Area Boundary has also contributed to a drop in intensification during the 2012-2014 time period. During this time period medium density development had an intensification rate of only 6%. In order to achieve a 40% intensification target it is important that medium density development also be directed into the built-up area.

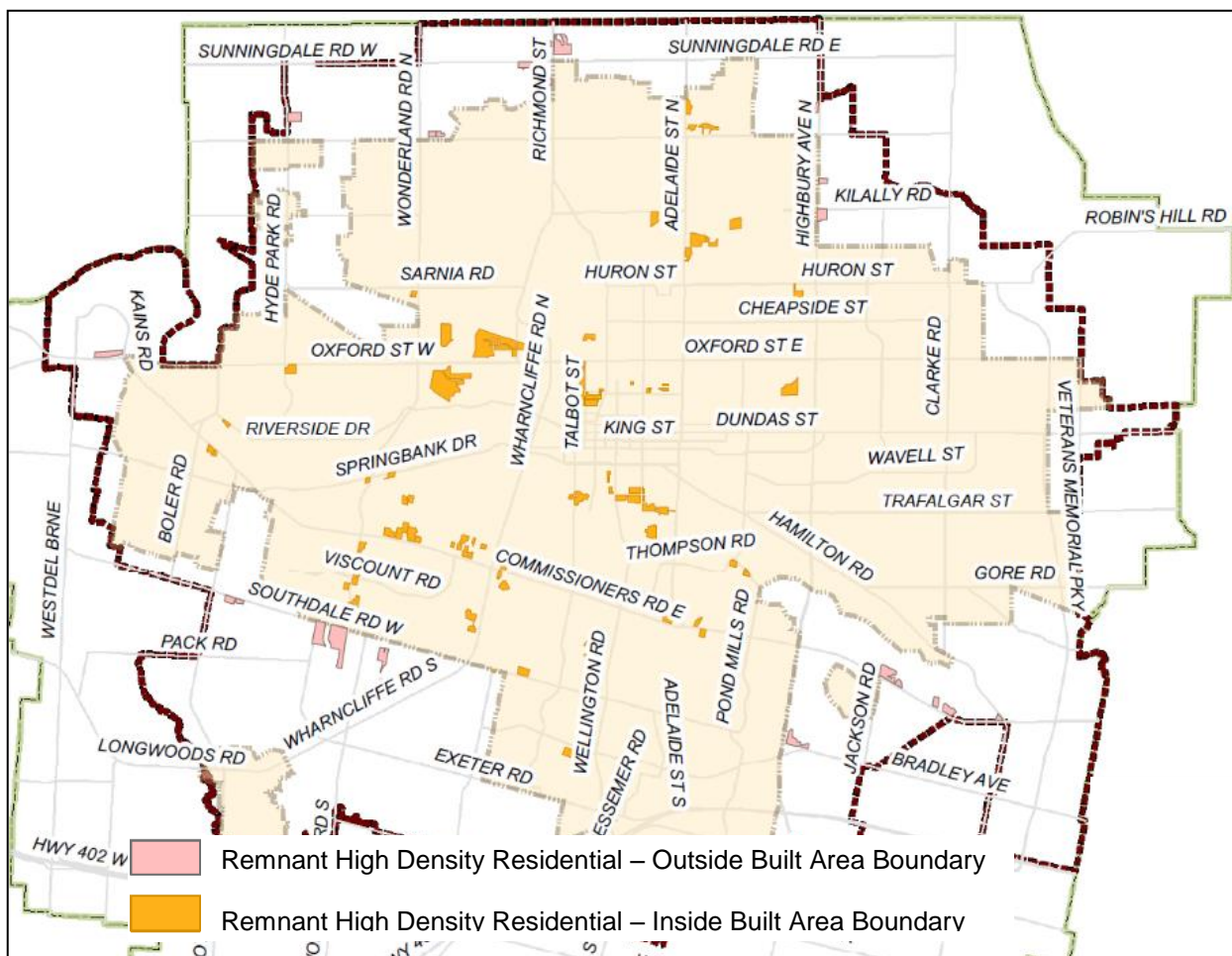


Figure 4 – Remnant High Density Residential from 1989 Official Plan & Built-Area Boundary

## IMPLICATIONS OF HIGHER INTENSIFICATION TARGETS

Residential intensification is dependent on the housing splits and location of each housing form inside and outside the Built-Area Boundary. A necessary policy to achieve the intensification target is to direct high density development within the built-up area. It is anticipated that The London Plan policies will be sufficient to achieve 40% intensification; however, an increase in the target above 40% may not be reasonable recognizing market conditions.

Table 5 shows what levels of intensification would be required for each housing form in order to achieve various intensification targets. Meeting the current 40% intensification target requires an increase in intensification rate for all housing forms above the most recent trends. The 2012-2014 rates were 4% for low density, 6% for medium density, and 68% for high density development. The intensification for each form in 2006-2011

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was more similar to what would be required for a 40% intensification target, but would also require a significant increase in intensification for medium density housing. The London Plan includes a greater focus on intensification than the previous plan, so we expect that these higher rates could be achieved.

Achieving a 45% intensification target would mean that the target rate from the Land Needs Background study must all be met. The highest average intensification rate for medium density over a five year period was 24% in 2006-2011. This rate would need to double to achieve a 45% intensification target. While it is possible that this occurs, it is too ambitious of a target to establish as a minimum standard by which to measure the success of the Plan.

Intensification targets that exceed 45% would require unrealistic intensification levels for medium and low density development, so they should not be considered for The London Plan’s intensification target.

**Table 5 – Required Intensification rate by Housing Form to Achieve Various Targets\***

Intensification Target	Intensification for each Housing Form		
	Low Density	Medium Density	High Density
<b>40%</b>	7%	29%	88%
<b>45%</b>	7%	52%	88%
<b>50%</b>	10%	60%	95%
<b>60%</b>	20%	80%	100%

\*Assumes that the housing splits will remain consistent with 2006-2014 rates of 45% of low density, 19% of medium density, and 36% of high density

<b>RECOMMENDED INTENSIFICATION TARGET</b>
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Based on the information in Table 4 and Table 5, as well as other municipalities’ best practices and a review of intensification rates in past years, 40% is an appropriate intensification target to include in The London Plan. It appears unlikely at this time that the London housing market would support the required housing splits and intensification rate for each housing form to achieve a higher target

Achieving an intensification target of 45%, when compared to 2012-2014 intensification levels would require a 20 percentage point increase in intensification of high density residential development, 46% percentage point increase in intensification of medium density residential development, a 3% percentage point increase in intensification of low density residential development. This change, while it may be possible to achieve, is too aggressive to be established as a minimum intensification target. It would not be an appropriate benchmark to evaluate the success of the policies of The London Plan.

40% is the appropriate intensification target for London that will require the City to provide leadership by encouraging sustainable, urban forms of development that are consistent with The London Plan’s vision to grow the City inward and upward.

<b>ADDING AN INTENSIFICATION TARGET FOR THE PRIMARY TRANSIT AREA</b>
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Staff believe that it would be appropriate to add a second intensification target related to the Primary Transit Area. The London Plan seeks to facilitate the development of high and medium density housing forms within these areas that will receive the highest levels of transit service. This supports the efficient delivery of transit, while also moving towards a more compact built form as encouraged by the Provincial Policy Statement. It

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is helpful establish a target to evaluate how well the Plan is achieving its goals that include transit servicing and City-building.

A review of building permit data shows that approximately 65% of all intensification in London occurred within the Primary Transit Area from 2012-2014, and 65% of intensification was also in the Primary Transit Area from 2006-2011. Staff recommend setting a target of 75% as the desired minimum percentage of all intensification that will occur within the Primary Transit Area. This is a reasonable target that will help to assess the degree to which intensification within the broader built-up area is being directed to the Primary Transit Area, where it has the greatest benefit in supporting transit and achieving a compact built form.

<b>CONCLUSION</b>
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Intensification is a key direction in The London Plan that is critical to achieving the vision for the city. An intensification target is included to measure of the level of success that the Plan is achieving. The intensification target does not itself change the approach that the City will take with regards to development, but rather provides an opportunity to monitor development and ensure that The London Plan is being effective. If intensification targets are consistently missed after the Plan is implemented, it will be an early indication to the City that certain actions may be required to achieve our objectives.

A target of 40% is realistic for the City of London and is consistent with what other municipalities in Ontario have implemented. To achieve this target, each housing form will need to meet the intensification target of the Land Needs Background Study and the housing splits outlined in, though the actual distribution may change over time. As The London Plan comes into effect one of the intended consequences is that a greater proportion of development will occur within the Built-Area Boundary.

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December 7, 2015  
JA