Report to Planning and Environment Committee

To: Chair and Members

Planning & Environment Committee

From: Scott Mathers MPA, P. Eng.,

Deputy City Manager, Planning and Economic Development

Subject: 258 Richmond Street

Public Participation Meeting

Date: May 30, 2022

Recommendation

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Siv-ik Planning and Design Inc. relating to the property located at 258 Richmond Street:

(a) the proposed by-law <u>attached</u> hereto as Appendix "A" **BE INTRODUCED** at the Municipal Council meeting May 30, 2022 to amend Zoning By-law No. Z.-1, in conformity with the Official Plan for the City of London (The London Plan, 2016) and the Official Plan for the City of London (1989), to change the zoning of the subject property **FROM** a Restricted Service Commercial (RSC2/RSC3/RSC4) Zone, **TO** a Holding Business District Commercial Special Provision (h-_*BDC(_)) Zone;

Executive Summary

Summary of Request

The property at 258 Richmond Street (the "subject lands") is recommended for rezoning from a Restricted Service Commercial (RSC2/RSC3/RSC4) Zone to a Holding Business District Commercial Special Provision (h-_* BDC(_)) Zone to permit a broader range of commercial and residential uses on the property and to recognize the existing frontage, lot coverage, vehicle parking and bicycle parking spaces. A Holding Provision is recommended to address concerns raised by the Canadian National Railway (CN Rail) that are further detailed in Appendix B of this report. No exterior alterations or physical changes to the site configuration are proposed as part of this application.

Special provisions would permit Hotel and Assembly Halls as additional permitted uses and allow; a lot frontage of 5.6m whereas 8m is required; a lot coverage of 85% whereas 70% maximum is required; 0 vehicle parking spaces whereas 4 parking spaces are required; and, 0 bicycle parking spaces whereas 2 spaces are required.

Purpose and the Effect of Recommended Action

The purpose and effect of the recommended Zoning By-law amendment is to allow a broader range of commercial and residential uses on the site that better support a "Main Street" function along Richmond Street. The proposed Amendment is not intended to facilitate the enlargement or expansion of the existing building and the special provisions are meant to recognize the existing site conditions in regard to frontage, lot coverage, and parking.

Rationale of Recommended Action

- 1. The recommended amendment is consistent with the Provincial Policy Statement, 2020;
- 2. The recommended amendment conforms to the policies of The London Plan, including but not limited to the Key Directions and Urban Corridor Place Type for the SoHo Main Street Specific Segment.

- The recommended amendment conforms to the in-force policies of the 1989 Official Plan, including but not limited to the Main Street Commercial Corridor (MSCC)
- 4. The recommended amendment would facilitate the reuse of the existing building and allow a broader range of uses that are appropriate for the context of the site.

Analysis

1.0 Background Information

1.1 Property Description

The subject lands are located northeast of the Richmond Street and Horton Street East intersection and are currently within the Central London Planning District and the Primary Transit Area. The site is currently 186.6m² with a lot frontage of 5.63m along Richmond Street and is occupied by an existing 2-storey building which is currently being used as an art gallery on the ground floor, and a legal non-conforming residential unit on the upper level. The subject lands also contain a loading area located at the rear of the existing building that is currently accessed via a laneway off Horton Street East.



Figure 1: Photo of the Front Façade of 258 Richmond Street (from Richmond Street)



Figure 2: Photo of Subject Site and rear laneway (facing North on Horton Street East)

1.2 Current Planning Information

- The London Plan Place Type Urban Corridor Place Type (SoHo Main Street Specific Segment)
- Official Plan Designation Main Street Commercial Corridor (MSCC)
- Existing Zoning Restricted Service Commercial (RSC2/RSC3/RSC4)
- Street Frontage Classification- Rapid Transit Corridor (Richmond Street)

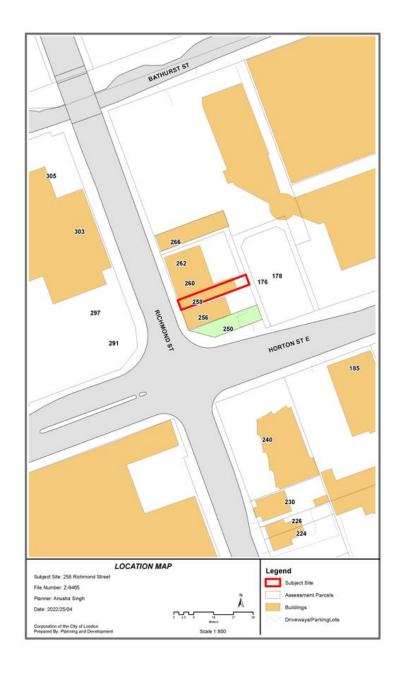
1.3 Site Characteristics

- Current Land Use Existing Art Gallery and Existing Residential Unit
- Frontage 5.63 metres
- Depth 33.09 metres
- Area approximately 186.62 square metres
- Shape Long, Narrow, and Rectangular

1.4 Surrounding Land Uses

- North Commercial
- East Recreational/Parking
- South Commercial
- West -Office/ Parking

1.5 Location Map



2.0 Discussion and Considerations

2.1 Development Proposal

The applicant has requested to rezone the subject lands to permit a broader range of commercial and residential uses on the property with special provisions to recognize existing site conditions. No additional development, change of use, or site alteration is proposed as part of this Amendment.

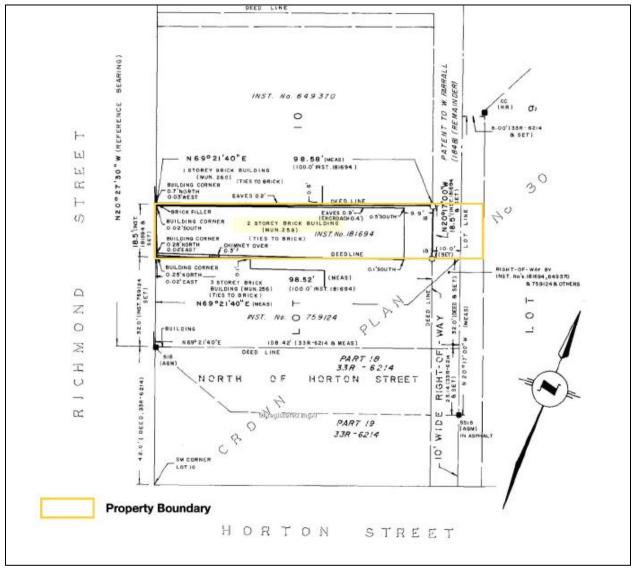


Figure 3: Existing conditions plan

2.2 Requested Amendment

The applicant has requested to rezone the lands to a Business District Commercial Special Provision (BDC(_)) Zone to permit a broader range of commercial and residential uses on the property. Special provisions are requested to include Hotel and Assembly Halls as additional permitted uses, and to allow; a lot frontage of 5.6m whereas 8m is required; a lot coverage of 85% whereas 70% maximum is required; 0 vehicle parking spaces whereas 4 parking spaces are required; and, 0 bicycle parking spaces whereas 2 spaces are required. The intent of the amendment is to allow a broader range of uses for the property that better support a "Main Street" function along Richmond Street.

2.3 Community Engagement (see more detail in Appendix B)

Staff received one (1) comment during the public consultation period. The comment expressed concerns over the maintenance of the access from Horton Street to the properties to the immediate north. The comment expressed concern that the Amendment would result in changes or impacts to laneway which could result in a loss of access to their properties.

On March 9th, 2022, Staff addressed the comment and clarified that the proposed Amendment will not alter the external layout of the site and will not result in an expansion or alteration to the exterior of the existing building. Staff received no further comments from the public as a result of this Amendment.

2.4 Policy Context

Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 2020 provides policy direction on matters of provincial interest related to land use planning and development. In accordance with Section 3 of the Planning Act, all planning decisions "shall be consistent with" the PPS.

Section 1.1 of the PPS encourages healthy, livable and safe communities which are sustained by promoting efficient development and land use patterns which sustain the financial well-being of the province and municipalities over the long term. The PPS directs settlement areas to be the focus of growth and development, further stating that the vitality and regeneration of settlement areas is critical to the long-term economic prosperity of our communities (1.1.3).

The London Plan

The London Plan is the new Official Plan for the City of London (Council adopted, approved by the Ministry with modifications, and the majority of which is in force and effect). The London Plan policies under appeal to the *Local Planning Appeals Tribunal* (Appeal PL170100) and not in force and effect are indicated with an asterisk throughout this report. The London Plan policies under appeal are included in this report for informative purposes indicating the intent of City Council but are not determinative for the purposes of this planning application.

The London Plan provides Key Directions (54_) that must be considered to help the City effectively achieve its vision. These directions give focus and a clear path that will lead to the transformation of London that has been collectively envisioned for 2035. Under each key direction, a list of planning strategies is presented. These strategies serve as a foundation to the policies of the Plan and will guide planning and development over the next 20 years. Relevant Key Directions are outlined below.

The London Plan provides direction to celebrate and support London as a culturally rich and diverse city by:

 Revitalizing London's downtown, urban main streets and their surrounding urban neighbourhoods to service as the hubs of London's culturally community (Key Direction #3, Direction 9)

The London Plan also provides direction to building a mixed-use compact city by:

- Implementing a city structure plan that focuses high-intensity, mixed-use development to strategic locations - along rapid transit corridors and within the Primary Transit Area.
- Plan to achieve a compact, contiguous pattern of growth looking "inward and upward"
- Sustain, enhance, and revitalize our downtown, main streets, and urban neighbourhoods
- Mix stores, restaurants, clean industry, live-work arrangements and services in ways that respect the character of neighbourhoods. (Key Direction #5, Directions 1, 2, 3 and 6)

The proposed rezoning supports these Key Directions by requesting permission to allow a broader range of uses that are more in line with a "Main Street" function and will assist in allowing the existing building to facilitate a mix of uses that can better serve the surrounding community.

The site is also located in the Urban Corridor Place Type within the SoHo Main Street Specific Segment as identified on *Map 1 – Place types. The SoHo Main Street Specific

Segment permits a range of residential, retail, service, office, cultural, recreational, and institutional uses that are intended to be provided at a pedestrian-oriented and walkable neighbourhood scale.

1989 Official Plan

The subject site is designated Main Street Commercial Corridor (MSCC) in accordance with Schedule 'A' of the 1989 Official Plan. Main Street Commercial Corridors are intended to have a street-oriented form with buildings close to the street at a scale that provides for easier pedestrian movement. They include a broad range of uses, that are compatible with adjacent developments and encourage residential uses combined with a wide range of commercial uses that would help promote active street life (4.4.1).

3.0 Financial Impact/Considerations

None.

4.0 Key Issues and Considerations

4.1 Issue and Consideration #1: Provincial Policy Statement, 2020

The PPS promotes the integration of land use planning, growth management, transitsupportive development, intensification and infrastructure planning to achieve costeffective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1e)).

Settlement areas are directed to be the focus of growth and development. Land use patterns within settlement areas shall be based on densities and a mix of land uses which efficiently use land and resources and are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available (1.1.3.2). Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment (1.1.3.2).

Planning authorities shall promote economic development and competitiveness by providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs (1.3.1). Lastly, the PPS encourages long-term economic prosperity to be supported by promoting opportunities for economic development and community investment-readiness (1.7.1 a)).

The recommended amendment is in keeping with the PPS 2020 as it facilitates the introduction of uses that are suitable within existing site context and within the Urban Corridor Place Type. As part of this application, the proposed building is not expected to be expanded nor are site features anticipated to change from what currently exists in regard to lot coverage, parking, and frontage. The recommended Amendment contributes to an appropriate mix, and range, of uses by providing for a broader spectrum of commercial, retail and residential uses allowed on the site. These uses will help contribute to a more diverse and vibrant pedestrian streetscape whilst also continuing to provide a mix of services to the surrounding community. The amendment will also promote opportunities for economic development and community investment-readiness. Lastly, the recommended amendment provides opportunities for a greater variety of uses and services in close proximity to residential neighbourhoods, thereby reducing the number of vehicle trips.

4.2 Issue and Consideration #2: Use, Intensity, and Form

1989 Official Plan

Areas designated Main Street Commercial Corridor (MSCC) are intended to have a street-oriented form with buildings located close to the street at a scale that provides for easier pedestrian movement. The MSCC designation encourages a broad range of uses that are compatible with adjacent developments and encourage residential uses

combined with a wide range of commercial uses that would help promote active street life (4.4.1).

The BDC Zone is typically applied to corridors with a main street character. This Zone provides for and regulates a mix of retail, restaurant, neighbourhood facility, office and residential uses located along pedestrian-oriented business districts. Typically, the Main Street Commercial Corridor designation is implemented through the BDC zone throughout the City. Rezoning the lands from the existing RSC zones to the proposed BDC Special Provision Zone is not anticipated to have any negative impacts and will allow a greater range of uses for the site that are more in line with a "Main Street" function and policies of the 1989 Official Plan.

The London Plan

The Urban Corridor Place Type and the SoHo Main Street Specific Segment permits a broad range of residential, retail, service, office, cultural, recreational, and institutional uses that are intended to be provided at a pedestrian-oriented and walkable neighbourhood scale. (837). Mixed-use buildings that are appropriate for the site context are encouraged and a broad range of uses at a walkable neighbourhood scale will be permitted within these areas (845_). A maximum intensity of 12 storeys, or 16 storeys with Type 2 Bonus Zoning, is contemplated in the SoHo Main Street Specific Segment (847_2).

The London Plan also identifies that, where appropriate, block concepts should be developed to provide for rear drive lanes and to coordinate automobile access and circulation in a way that discourages vehicles from having to park or gain access to a building's front yard (841_). Furthermore, the Plan highlights that cultural heritage resources shall be conserved with the Cultural Heritage polices of the London Plan in accordance with the Ontario Heritage Act. Proposals adjacent to cultural heritage resources will be required to assess potential impact on these cultural heritage resources and design new development to avoid or mitigate impact. (848_1)

The property at 258 Richmond Street is directly adjacent to a Listed Heritage Property at 256 Richmond Street. This amendment is not currently proposing to expand or alter the exterior composition of the building or site layout and instead aims to expand the uses permitted within the existing building allowing for the efficient utilization of the site. For this reason, there are no heritage implications as a result of this application and no additional impacts are anticipated on the subject lands or any of the surrounding properties.

Staff are of the opinion that rezoning the subject lands to a Business District Commercial Special Provision (BDC(_)) Zone is in line with the above policies and will not have negative impacts on the surrounding community.

** It is noted that the policies outlined in Section 837 of The London Plan are subject to appeal and are therefore informative, but not determinative, for the purpose of this application.

4.3 Issue and Consideration #3: Zoning

The applicant has requested to rezone the lands from the existing Restricted Service Commercial (RSC2/RSC3/RSC4) Zone to a Business District Commercial Special Provision (BDC(_)) Zone. The intent is to permit the wider range of uses permitted in the BDC Zone on the site as well as to include Hotels and Assembly Halls as additional permitted uses. Special Provisions are also requested to recognize the existing lot frontage of 5.6m whereas 8m is required; the existing lot coverage of 85% whereas 70% maximum is required; the existing 0 vehicle parking spaces whereas 4 parking spaces are required; and, the existing 0 bicycle parking spaces whereas 2 spaces are required.

The existing RSC zone variations permit a range of moderate intensity commercial

uses, automobile uses, and trade service uses, which often require larger amounts of land, greater space for outdoor storage, and a larger building footprint to properly operate. The subject site is approximately 186.62m² in size with a frontage of 5.63m that will unlikely allow for many of the existing automotive and trade service uses currently permitted within the existing zone to properly function on the property.

As such, staff are of the opinion that the existing RSC zones do not appropriately or effectively provide a range of commercial uses that would allow the site to serve the community at its full potential, nor do they implement the 1989 Official Plan and London Plan policies that aim to develop the Richmond Street Corridor into a vibrant, pedestrian oriented, and walkable main street. Furthermore, Business District Commercial (BDC) zones are typically meant to be applied to corridors with a main street character. The BDC zone provides for and regulates a mix of small-scale retail, restaurant, neighbourhood facility, office and residential uses and apply to areas where building can be located near the street line with parking to the rear.

Through circulation, comments were received from Canadian National Rail (CN Rail) with respect to railway noise and sensitive land uses, such as residential. The City is recommending that a Holding Provision be included as part of the proposed rezoning to address concerns raised by the CN Rail. The recommended Holding Provision will require that a noise analysis be carried out and submitted to the City by a qualified professionals at the time of a change of use permit. The holding provision would also require that any recommendations for mitigation measures within the noise analysis shall be implemented to the satisfaction of the Site Plan Approval Authority prior to the removal of the "h-_" symbol.

For the reasons outlined above, staff supports the Amendment to rezone the lands from the existing Restricted Service Commercial (RSC2/RSC3/RSC4) zones to a Business District Commercial Special Provision (BDC(_)) Zone. Staff also supports the requested special provisions to recognize the existing conditions regarding parking, lot coverage, and lot frontage as they can be considered appropriate for the use of the lands given its existing size and location. Lastly, the proposed amendment does not seek any site or building alterations as part of this application and aims to recognize the existing deficiencies.

Conclusion

The recommended Amendment is consistent with the Provincial Policy Statement, 2020 and conforms to the policies of The London Plan and the 1989 Official Plan. The recommended Amendment would facilitate the reuse of the existing building by recognizing existing site conditions and allowing a broader range of residential and commercial uses on the property which are considered appropriate and compatible within the surrounding context.

Prepared by: Anusha Singh

Planner I

Reviewed by: Mike Corby, MCIP, RPP

Manager, Planning Implementation

Recommended by: Gregg Barrett, AICP

Director, Planning and Development

Submitted by: Scott Mathers, MPA, P. Eng

Deputy City Manager, Planning and Economic

Development

Appendix A

ii) Lot Coverage (maximum)

		Bill No.(number to be inserted by Clerk's Office)
		2022
		By-law No. Z1
		A by-law to amend By-law No. Z1 to rezone an area of land located at 258 Richmond Street
WHEREAS Siv-ik Planning and Design. has applied to rezone an area of land located at 258 Richmond Street, as shown on the map attached to this by-law, as set out below;		
	AND WHEREAS this rezoning co	nforms 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. Z1 is amended by changing the zoning applicable the lands located at 258 Richmond Street, as shown on the attached map comprising part of Key Map No. A107, from a Restricted Service Commercial (RSC2/RSC3/RSC4) Zone to a Holding Business District Commercial Special Provision (h*BDC(_)) Zone.		
,	Section Number 3.8 2) of the Holding "h" Zones section is amended by adding the following Holding Zone:	
h 258 Richmond Street		
	land uses created by the Canadia analysis shall be carried out at the qualified professional and submitt contained therein for mitigation m	possible adverse effects on sensitive in Nation Railway (Main Line), a noise it time of a change of use permit by a sed to the City. Any recommendations easures shall be implemented to the oval Authority, prior to the removal of the
	Permitted Interim Uses: Uses per residential	mitted in the BDC Zone other than
 Section Number 25.4 of the Business District Commercial (BDC) is amended by adding the following Special Provision: 		
BDC(_) 258 Richmond Street		
a) Additional Permitted Uses:		
	i) Hotels and Assembly H	lalls
b) Regulations:		
	i) Lot Frontage (m) (Minimum)	5.6 metres

75%

iii) Off-Street Parking
(Minimum) - Existing as of the
date of the passing of this By-law
for all permitted uses within
the existing Gross Floor Area
of the building

No additional parking spaces shall be required for conversions and/or changes of use within the existing floor area provided that the number of parking spaces which existed on the effective date of this By-law shall continue to be provided and maintained. Where an addition to, or expansion of, the existing building is proposed the parking requirements of Zoning By-Law shall only

iv) Bicycle Parking (Minimum)

No bicycle parking requirements shall apply to the conversion of existing buildings for residential or non-residential uses

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.

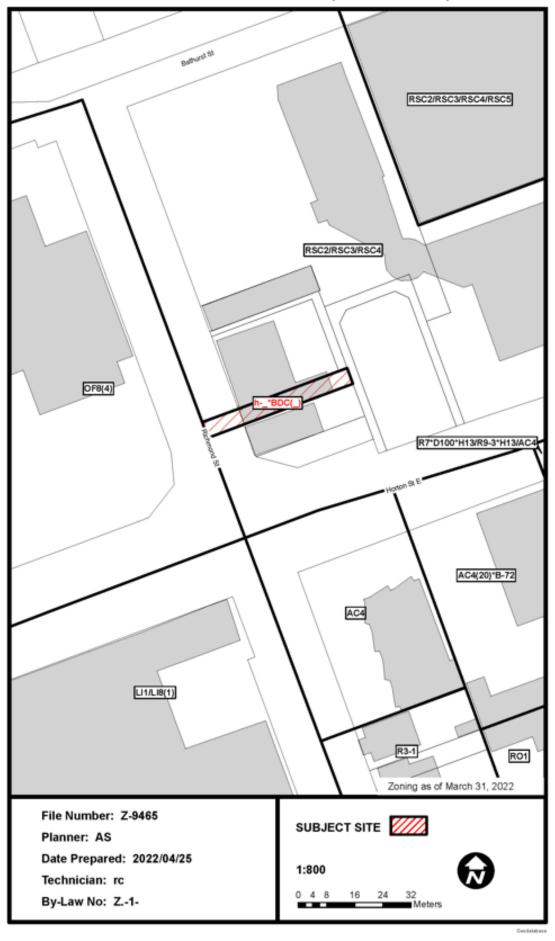
PASSED in Open Council on June 14, 2022

Ed Holder Mayor

Michael Schulthess City Clerk First Reading – June 14, 2022

Second Reading – June 14, 2022 Third Reading – June 14, 2022

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



Appendix B – Public Engagement

Community Engagement

Public liaison: On February 23, 2022, Notice of Application was sent to property owners and tenants in the surrounding area. Notice of Application was also published in the *Public Notices and Bidding Opportunities* section of *The Londoner* on February 24, 2022. A "Planning Application" sign was also posted on the site.

One public comment was received and was addressed.

Nature of Liaison: The purpose and effect of this zoning change is to permit A Place of Worship. Possible change to Zoning By-law Z.-1 FROM a Restricted Service Commercial (RSC2/RSC3/RSC4) Zone TO a Business District Commercial Special Provision (BDC (_)) Zone. The following Special Provisions will apply on the site: Additional permitted uses: Hotel and Assembly Hall; lot frontage of 5.6m whereas 8m is required; lot coverage of 85% whereas 70% maximum is required; 0 vehicle parking spaces whereas 4 parking spaces are required; 0 bicycle parking spaces whereas 2 spaces are required. The City may also consider additional special provisions.

Public Responses: 1

The Ward Councillor, on behalf of several area residents, provided the following questions and concerns with respect to this application:

• Concern over the impact of existing property access directly off Horton Street as a result of the re-zoning

Agency/Departmental Comments

February 24, 2022: CN Railway

It is noted that the subject site is located in proximity to a CN railway corridor. Some of the uses proposed as part of the amendment, including dwellings/residential uses, hotels, bed and breakfast establishments and day care centres, are considered sensitive in nature. It should be noted that CN has concerns of developing/densifying residential uses in proximity to the railway right-of-way. This is due to noise, vibration and potential trespass issues that will result. Development of sensitive uses in proximity to railway operations cultivates an environment in which land use incompatibility issues are exacerbated.

Please refer to CN's guidelines below for the development of sensitive uses in proximity to railways. CN's guidelines reinforce the safety and well-being of any existing and future occupants of the area. CN urges the municipality pursue the implementation of the criterion as conditions of an eventual project approval. These policies have been developed by the Railway Association of Canada and the Federation of Canadian Municipalities. Please visit http://www.proximityissues.ca for more information.

- 1. The Owner shall engage a consultant to undertake an analysis of noise. At a minimum, a noise attenuation barrier shall be adjoining and parallel to the railway rights-of-way, having returns at the ends, and a minimum total height of 5.5 metres above top-of-rail. Acoustic fence to be constructed without openings and of a durable material weighing not less than 20 kg. per square metre of surface area. Subject to the review of the noise report, the Railway may consider other measures recommended by an approved Noise Consultant.
- 2. Ground-borne vibration transmission to be evaluated in a report through site testing to determine if dwellings within 75 metres of the railway rights-of-way will be impacted by vibration conditions in excess of 0.14 mm/sec RMS between 4 Hz and 200 Hz. The monitoring system should be capable of measuring frequencies between 4 Hz and 200 Hz, ±3 dB with an RMS averaging time constant of 1 second. If in excess, isolation measures will be required to ensure

- living areas do not exceed 0.14 mm/sec RMS on and above the first floor of the dwelling.
- 3. The following clause should be inserted in all development agreements, offers to purchase, and agreements of Purchase and Sale or Lease of each dwelling unit within 300m of the railway right-of-way: "Warning: Canadian National Railway Company or its assigns or successors in interest has or have a rights-of-way within 300 metres from the land the subject hereof. There may be alterations to or expansions of the railway facilities on such rights-of-way in the future including the possibility that the railway or its assigns or successors as aforesaid may expand its operations, which expansion may affect the living environment of the residents in the vicinity, notwithstanding the inclusion of any noise and vibration attenuating measures in the design of the development and individual dwelling(s). CNR will not be responsible for any complaints or claims arising from use of such facilities and/or operations on, over or under the aforesaid rights-of-way."
- 4. The Owner shall through restrictive covenants to be registered on title and all agreements of purchase and sale or lease provide notice to the public that the safety berm, fencing and vibration isolation measures implemented are not to be tampered with or altered and further that the Owner shall have sole responsibility for and shall maintain these measures to the satisfaction of CN.
- 5. Any proposed alterations to the existing drainage pattern affecting railway property must receive prior concurrence from the Railway and be substantiated by a drainage report to the satisfaction of the Railway.
- 6. The Owner shall enter into an Agreement with CN stipulating how CN's concerns will be resolved and will pay CN's reasonable costs in preparing and negotiating the agreement.
- 7. The Owner shall be required to grant CN an environmental easement for operational noise and vibration emissions, registered against the subject property in favour of CN.

March 21, 2022: Engineering

No comments as the application will not impact the current site servicing.

September 2021: Heritage

Please note that 258 Richmond St is adjacent to a LISTED property on the City's *Register* at 256 Richmond Street. Adjacencies matters have no bearing on the above pre-consultation proposal. However, if a new or adaptive re-development is proposed on the property at 258 Richmond St. in a future application, a heritage impact assessment may be required as part of a complete application.

February 23, 2022: Parks Planning

No comments.

February 23 2022: London Hydro

London Hydro has no objection to this proposal or possible official plan and/or zoning amendment. Any new or relocation of the existing service will be at the expense of the owner.

March 11, 2022: Transportation

No Comments

March 11, 2022: Transportation

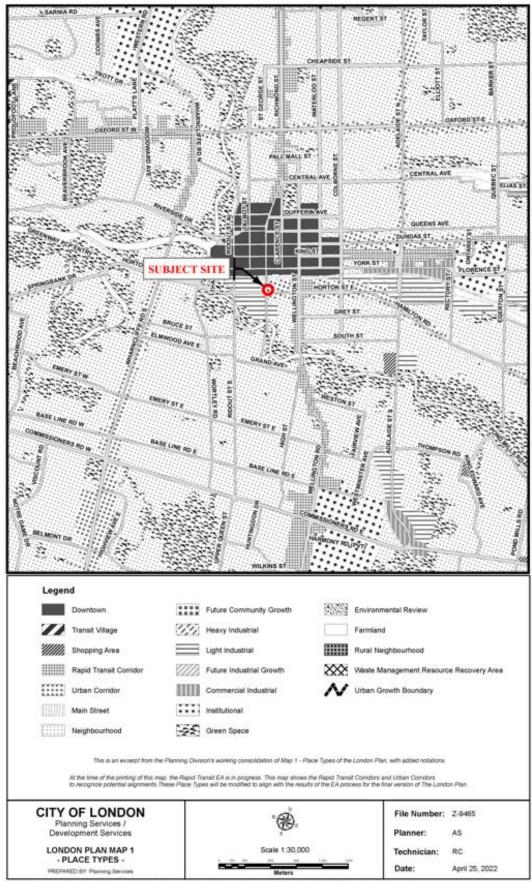
As there are not proposed changes to the building, there are no urban design related comments for 258 Richmond Street.

February 28, 2022: UTRCA

Please be advised that the subject lands are not affected by any regulations (Ontario Regulation 157/06) made pursuant to Section 28 of the Conservation Authorities Act. Accordingly, we have no objections or Section 28 Permit requirements.

Appendix C - Relevant Background

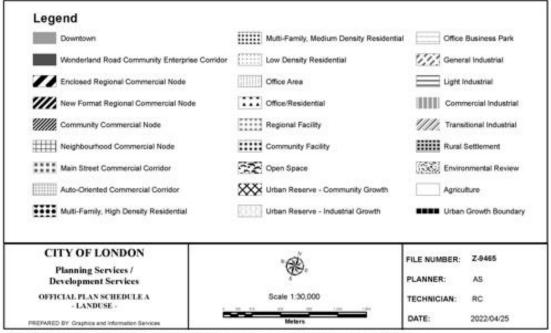
The London Plan - Map 1 - Place Types



Project Location: E:(Planning/Projects/p_officialplan/workconsol00/excerpts_LondonPlan/mxds/Z-9465-Map1-PlaceTypes.mxd

1989 Official Plan - Schedule A - Land Use





 $PROJECT LOCATION: e! planning projects !p_official plantwork consol 00 excerpts limited, permitted as being both as larger than the project of the plantwork consol 00 excerpts limited, and the plantwork permitted as a project of the plantwork permitted as a project of the plantwork permitted as a project of the plantwork permitted as a plantw$

Zoning By-law Z.-1 – Zoning Excerpt

