



56 and 58 Capilano Drive

Planning Rationale Addendum
Zoning By-law Amendment
December 22, 2023



Prepared for Ottawa Salus Group

Prepared by Fotenn Planning + Design
396 Cooper Street, Suite 300
Ottawa, ON K2P 2H7

December 2023

© Fotenn Planning + Design

The information contained in this document produced by Fotenn is solely for the use of the Client identified above for the purpose for which it has been prepared and Fotenn undertakes no duty to or accepts any responsibility to any third party who may rely upon this document.

1.0 Introduction

Fotenn Consultants Inc. (“Fotenn”) has been retained by Ottawa Salus Corporation (“Salus”) to prepare this Planning Rationale in support of a Zoning By-law Amendment application for 56 and 58 Capilano Drive (“subject property”).

1.1 Application History and Context

The subject property was formerly part of the City View Curling Club and was created through a severance in 2016. McDonald Bros. Consulting Inc. (“MBC”) retained Fotenn in early 2022 to submit a Zoning By-law Amendment application (D02-02-22-0055) to rezone the property from a Community Leisure (L1) Zone to Residential Fourth Density (R4) Zone, with a site-specific exception associated with a holding symbol (R4Z [2840]-h). The purpose of the rezoning was to facilitate a partnership with a non-profit housing provider to develop the subject property as an affordable or supportive community housing project. Following the application submission, McDonald Brothers partnered with Salus, and the requested amendments to the zoning were adjusted to meet Salus’s needs, including no minimum for resident parking. Council passed the Zoning By-law Amendment in November 2022.

Following approval of the Zoning By-law Amendment, Salus continued to develop the program for the subject property to propose a Planned Unit Development (PUD) consisting of a low-rise apartment with 54 studio units, accessory office and amenity spaces, and a townhouse block with four (4) four-bedroom units along the site frontage. A total of 12 visitor parking spaces and three resident spaces are provided as well as a common outdoor amenity area located in an internal courtyard between the two buildings. The proposed development was subject to a Site Plan Control application submitted on March 29th, 2023 (D07-12-23-0028), which has since been approved to the satisfaction of the General Manager, Planning, Real Estate, and Economic Development.



Approval of the Site Plan required additional minor relief from the Zoning By-law, which was sought through a Minor Variance Application (File Numbers D08-02-23/A-00201 and D08-01-23/A-00217). A concurrent Consent application (File Number D08-01-23/B-00208, D08-01-23/B-00219) was also submitted to facilitate site financing. The Minor Variance application sought relief to capture provisions resulting from the revised site plan, and consent application. Although Salus will continue to retain ownership and operation of the two parcels the Minor Variance application ensured the parcels can function independently. Both applications were granted by the Committee of Adjustment on October 3rd, 2023, with a written decision issued on October 13, 2023, and the appeal period ending on November 2nd with no appeals being filed. The consent has not

yet been finalized, but as part of the application, it was confirmed that the townhouse block would be municipally known as 56 Capilano, while the apartment block will be addressed as 58 Capilano.

An application for Lifting of the Holding Symbol was submitted on October 26th, 2023 as all the conditions for the removal were met. The application to amend By-law No. 2023-470 was approved by council on November 8th, 2023. The timing of these applications was driven by the need to meet the funding deadlines of the Rapid Housing Initiative, which is providing financing for the apartment portion of the project. This funding is provided by CMHC and administered by the City of Ottawa.

Resulting in part from the requirement to meet strict financing deadlines, there are several aspects of the desired site design and program which are not reflected in the current Site Plan Approval, and which require further zoning relief. The most significant of these is to add “office” as a permitted ancillary use, to allow Salus to relocate some of their office functions within the basement of the apartment building at 58 Capilano drive. This component of the programming was not contemplated at the time of the Site Plan Control application submission, and the office uses at that time were limited accessory office uses required to accommodate programming for the residents. However, as Salus’s plans developed, the opportunity was identified to move to a “hub-and-spoke” model for Salus’s operations.

Given the anticipated minor impact of the changes, a redline change to amend the Site Plan Approval will be requested, subject to approval of the enclosed Zoning By-law Amendment application.

2.0 Site Context and Surrounding Area

2.1 Site Context

The subject property is municipally known as 56 and 58 Capilano Drive and is in the Knoxdale-Merivale Ward of the City of Ottawa. The property is legally described as Part 2 on plan 4R-27938 and is part of Lot 15 on Registered Plan 353 in the City of Ottawa. The townhouse block is identified as parts 1 and 5 and the Apartment block is made up of parts 2, 3 and 4 of the recently approved Draft R-Plan, pending registration. The total combined area of the two parcels is 2,774.84 square meters, with approximately 59 metres of frontage on Capilano Drive.

The property is currently vacant. Hydro and streetlight poles are located along the Capilano Drive frontage. A partial building permit has been released under the existing Site Plan Approval, to allow initial construction work limited to tree removal and foundations.



Figure 1: Subject Property, and Surrounding Area.

The subject property is located adjacent to the Merivale Road corridor, a primarily commercial mainstreet corridor in the City of Ottawa. To the **north** the subject property is bound by Capilano Drive. Further north across Capilano Drive is a low-rise residential neighbourhood consisting of several single detached homes built in a traditional suburban pattern of development (Figure 1, Image 1). Approximately 350 metres north of the site is the “Merivale Triangle”, bound by Merivale Road, Clyde Avenue and Baseline Road. The Merivale Triangle currently contains several large-format grocery stores, and is planned for high-rise, high-density mixed-use development. Baseline Road and Merivale Road are designated as Arterial Roads in the City’s Road Classification system. West and south of the subject property, retail, commercial and office uses that front onto the Merivale Road Corridor. These commercial plazas include a range of large and small format retail, commercial, restaurant, office, personal service and grocery uses. There is also a public library located in this development.

Although the urban environment of Merivale Road is auto-oriented and suburban in character, a wide range of services, businesses and amenities are located along the corridor in close proximity to the subject site. The subject property is well served by a mix of uses, including grocery stores, medical clinics, a public library, parks, schools, restaurants and places of worship.

The subject property is bounded to the **east** and **south** by City View Curling Club on 50 Capilano Drive. The Curling Club sits on a flag-lot, with a 14-meter-wide strip connecting the main part of the Curling Club property to Capilano Drive. The strip is developed with a driveway and perpendicular parking spaces, as well as two landscape bulb-outs with tree plantings (Figure 1, Image 3). To the **West** the subject property abuts the rear yard of a commercial plaza with frontage on Merivale Road (Figure 2, Images 4 and 5). Merivale Road is an Arterial Road in the City’s road classification system, and is a prominent commercial corridor characterized by deep lots and a mix of commercial and institutional uses.

Further east of the Curling Club driveway is the low-rise Skyline – Fisher Heights neighborhood, developed with a traditional suburban pattern of development.



Figure 2: Surrounding Context

Further information regarding the site context may be found in the Planning Rationale prepared by Fotenn for the Site Plan Control application, dated March 10, 2023.

3.0 Proposed Development

3.1 Proposed Program

The proposed development has remained consistent with the approved Site Plan and consists of a townhouse block with four (4) units fronting on Capilano Drive (56 Capilano), and a four-storey 54-unit residential building (58 Capilano) to the rear of the lot. The buildings flank an interior courtyard, which provides communal amenity space and parking. A full description of the proposed development can be found in the Planning Rationale prepared by Fotenn for the Site Plan Control application, dated March 10, 2023.

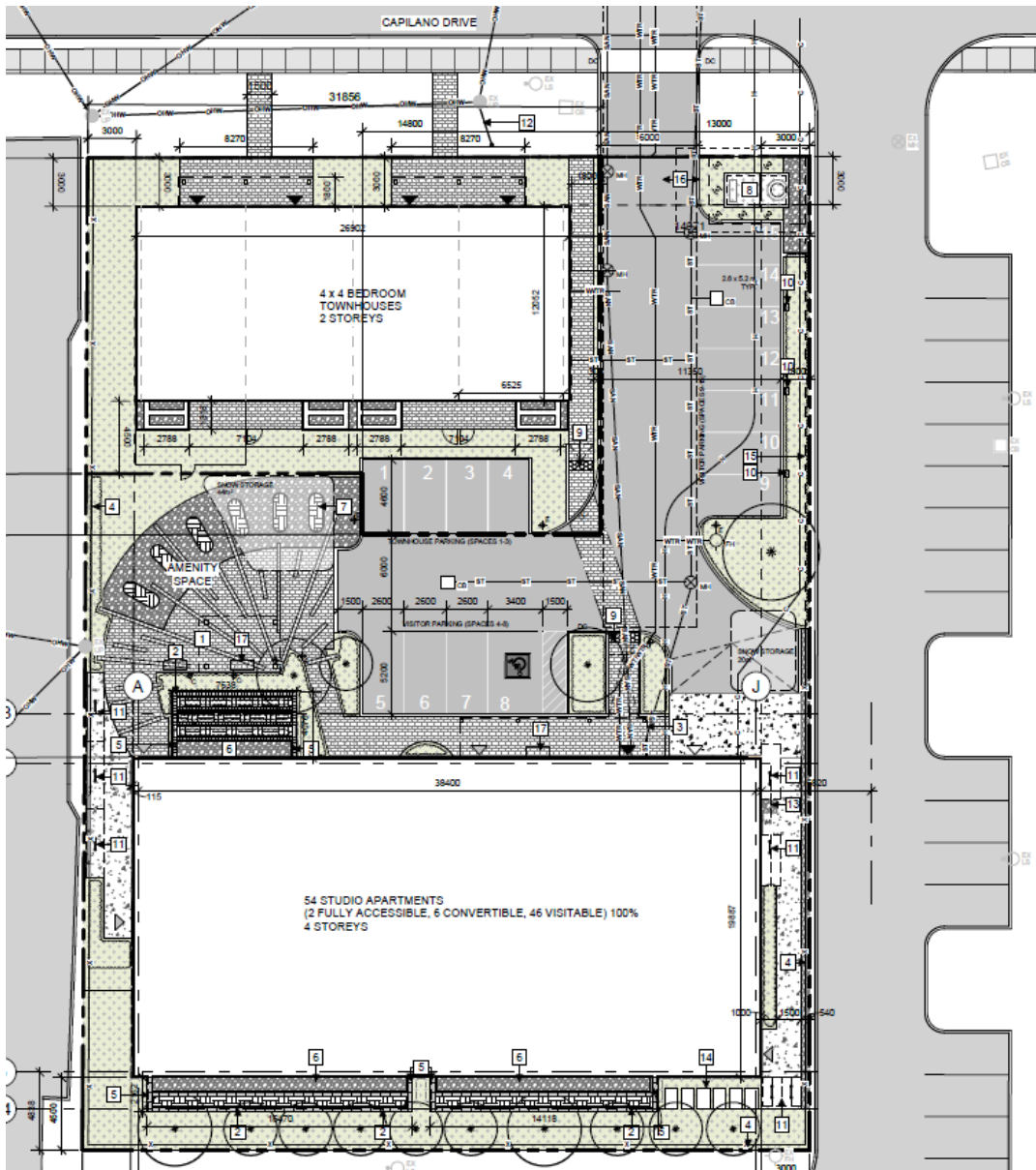


Figure 3: Extract from Proposed Site Plan

The proposed changes to the Site Plan-approved development are limited to the following:

- / The function of the basement office suite has changed, such that they no longer meet the definition of “accessory” office use, and are now proposed to be used as ancillary office space;
- / The drive aisle throat has been widened to six (6) metres, to allow for easier access by emergency vehicles and service vehicles;
- / The design of the window wells on the 58 Capilano building;
- / The landscaped areas and pathway directly in front of the entrance to 58 Capilano have been slightly re-arranged;
- / The parking along the east lot line has shifted approximately 0.2 metres north to accommodate a larger hydro transformer; and
- / The design of the internal courtyard amenity area has been enhanced.

The office suite in the basement, which has a total gross floor area of 163 metres, which was originally intended primarily to serve programming and support services for building residents, is now intended to also host some of Salus’s administrative functions, including offices for directors and financial services. This change aligns with Salus’s move to a hub-and-spoke model for their administrative functions and will allow for reallocation of other office space in their portfolio to supportive housing uses.

The provided parking under the approved Site Plan is sufficient to meet the needs of the resident visitor and office use, both from a zoning compliance perspective and with respect to the anticipated operations of the building.

In order to permit the proposed development, several provisions are proposed to be added to the existing site-specific zoning:

- / Permit office as an ancillary use;
- / Apply “one lot for zoning purposes” to the entire area subject to zoning exception 2840;
- / Notwithstanding the inclusion of an ancillary office use in 58 Capilano, apply the provisions for apartment, low-rise;
- / Permit reduced interior side yard setbacks of three metres (as already granted through the Minor Variance application); and
- / Allow wider walkways, a minimum interior side yard setback of three (3) metres, and one reduced-size required visitor parking space, as previously approved through a Minor Variance.

4.0 Policy and Regulatory Framework

4.1 Provincial Policy Statement, 2020

In Ontario, the Provincial Policy Statement (PPS), enacted in 2020, provides direction on land use planning and development matters of provincial interest. Decisions impacting planning matters “shall be consistent with” the policy statements within the PPS.

The PPS encourages the formation of, “strong, liveable, healthy and resilient communities”, through efficient land use patterns and infrastructure development incorporating increased densities and a mix of uses. Development within designated “settlement areas” should be based on densities and a mix of land uses that efficiently use land and resources; are appropriate for the infrastructure and public service facilities which are planned or available; minimize negative impacts to air quality and climate change; support active transportation; and are transit-supportive.

Policies 1.1.3.2 to 1.1.3.5 of the PPS particularly recognize intensification as a development pattern that efficiently uses land and can be used to form healthy, safe and liveable communities.

Policy 1.6.7.4 states that land use patterns, densities, and a mix of uses should be promoted to minimize the length and number of vehicle trips and to support the development of viable choices for public transit and other alternative transportation modes.

Policy 1.3.1(d) encourages compact, mixed-use development that incorporates compatible employment uses to support livable and resilient communities with consideration of housing policy 1.4.

The requested Zoning By-law Amendment is consistent with the policies of the Provincial Policy Statement as it will facilitate minor changes to an approved development that will improve its functioning. The addition of a small-scale office which is ancillary to the primary supportive housing use represents an efficient use of land, resources and infrastructure. The proposed office use is compatible with the surrounding neighbourhood.

The Zoning By-law Amendment, including the proposed “one lot for zoning purposes” provision, will facilitate the creation of units that provide affordable and supportive housing for adults living with mental health and other disabilities.

4.2 City Of Ottawa Official Plan (2022, as amended)

The City of Ottawa Official Plan (the “Plan”) was approved by the Ministry of Municipal Affairs and Housing (MMAH) with amendments on November 4th, 2022. The Plan sets out policies that are designed to guide growth within the City to the year 2046. The Plan is organized by five (5) Strategic Policy directions which form the foundation for making Ottawa the most livable mid-sized city in North America over the next century. Section 2.1 of the Official Plan outlines these broad policy directions as follows:

- 1) **Achieve, by the end of the planning period, more growth by intensification than by greenfield development.**
- 2) **By 2046, the majority of trips in the city will be made by sustainable transportation.**
- 3) **Improve our sophistication in urban and community design and put this knowledge to the service of good urbanism at all scales, from the largest to the very small.**
- 4) **Embed environmental, climate and health resiliency and energy into the framework of our planning policies.**
- 5) **Embed economic development into the framework of our planning policies.**

The requested Zoning By-law Amendment is consistent with and will help to achieve the objectives of these Strategic Policy directions. The integration of office uses into the basement of the already-designed building represents an intensification of the functions on the site, in a built form and site design that can accommodate the additional use.

4.2.1 Growth Management Framework

In order to achieve the City's growth management objectives of more growth through intensification than greenfield development over the planning horizon, intensification is anticipated to occur throughout the urban area in a variety of built forms and height categories.

Residential growth is to occur to achieve 15-minute neighborhoods by supporting a mix of uses and densities in a compact design that encourage active transportation and transit use (S.3.3.1). While employment uses that are compatible with residential uses are generally permitted within Hubs and Corridors (S.3.5.1), smaller scale, service-oriented employment uses such as office-based uses are permitted within Neighborhoods (S.3.5.2).

The proposed Zoning By-law Amendment is consistent with the Official Plan policies for Managing Growth. The number of residential units in the approved plan are not proposed to change, but the requested amendment will allow the addition of a small-scale office suit within a portion of the basement of the building. This office use will allow Salus to provide on-site services to their clients residing in the building and their larger community. The proposed use is consistent with the Official Plan policies that seek to integrate compatible small-scale service-oriented office-like uses in Neighbourhood designations and promote a mix of uses to create 15-minute communities.

4.2.2 Transect and Land Use Designation

The subject property is located within the **Outer Urban Transect** of the City of Ottawa and is designated **Neighbourhood** with an **Evolving Neighbourhood Overlay** (Figure 11). The policies of the Official Plan seek to transition the Outer Urban Transect towards a 15-minute urban pattern of development. This development pattern includes higher-density ground-oriented development, and good integration between commercial, civic, and institutional uses and residential areas (S. 5.3.1(1)). In Neighbourhoods close to frequent street transit and corridors, low-rise multi-unit development is strongly encouraged (S. 5.3.1(4)(b)).

Neighbourhoods are contiguous urban areas that constitute the heart of communities. Within the Outer Urban Transect, Neighbourhoods will implement Zoning standards that transition away from a suburban model and towards an urban built form to meet the residential growth targets as outlined in the Growth Management Strategy of the Official Plan (5.3.4(1)).

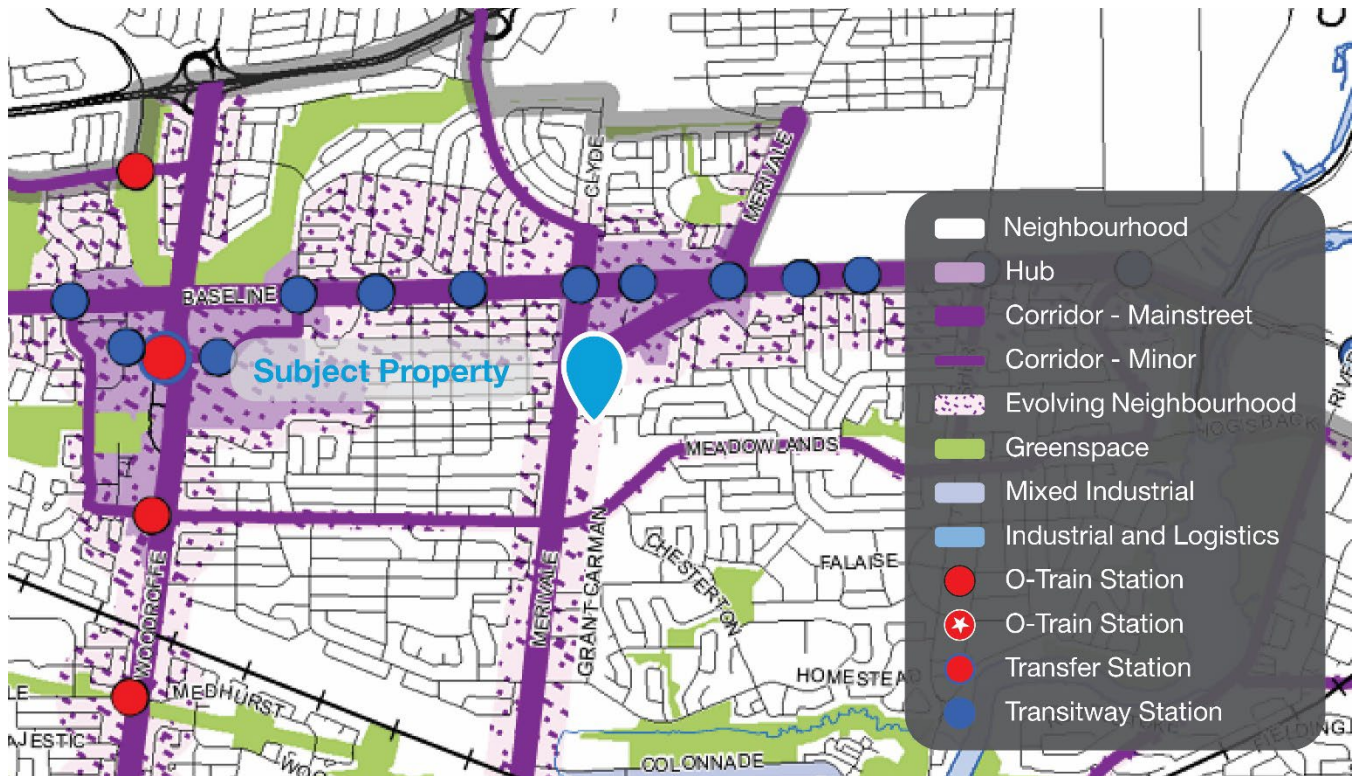


Figure 4: Schedule B3 - Outer Urban Transect, City of Ottawa Official Plan

A full range of compatible local services that contribute to the establishment of 15-minute neighbourhoods are permitted in neighbourhoods (S.6.3.1(4)(d)). Limited large-scale non-residential uses, office-based employment, large, and small-scale institutions and facilities are also permitted in Neighbourhoods through Zoning By-law Approvals under the *Planning Act* (S.6.3.1(4)(e)).

Section 6.3.2 of the Official Plan directs the City to provide form-based regulation which will have regard for local context, interface with the public realm, proximity to corridors, transition in building form to nearby designations, the intended density to be accommodated within the permitted building envelope and Policy 1(d) of Section 4.2.1 which require appropriately balancing the value of policies to the public interest against the impacts to housing affordability.

To encourage new forms of housing and intensification within Neighbourhoods in the Outer Urban Transect, the Official Plan encourages the use of “one lot for zoning purposes” where doing so does not impede functional standards and requirements (S.6.3.2(6)).

Section 6.3.3 of the Official Plan specifically addresses non-residential uses in Neighbourhoods, to ensure that neighbourhoods form the cornerstone of liveability in the city. Policy 2 of this section states that the City shall allow small-scale non-residential uses on all Collector streets and in clusters of areas that already have these functions. Where these uses are allowed, the Zoning By-law will permit the fluid switch between residential and non-residential small scale uses, to support flexible market needs and the resiliency of buildings.

Policy 3 of section 6.3.3 sets out specific criteria outlining when the City shall permit small-scale non-residential uses that are not already permitted as-of-right. The proposed ancillary office use meets all of these criteria in the following ways:

- / a) They are small scale and serve the surrounding lands;

The proposed office has a gross floor area of 163 metres, is located within the basement of an approved building, and will function to serve the residents of 56 and 58 Capilano, as well as Salus’s broader community.

- / b) They are conveniently located with respect to concentrations of residential development and provide direct access for pedestrians and cyclists from adjacent residential areas;

The proposed office use is located logically to serve the residents of the community, and will efficiently share facilities with the residential use.

- / c) They help to facilitate interaction among residents and contribute to healthy 15-minute neighbourhoods; and **In addition to serving Salus’s administrative needs, the office use will support staff who come into the community to provide direct services to Salus’s residents. These services, such as counselling, are critical to ensuring a good quality of life for residents and will facilitate their participation in the community.**

- / e) They are of a size and scale that shall not result in the attraction of large volumes of vehicular traffic from outside the immediate area.

The proposed use is very small in scale, is not anticipated to generate large volumes of traffic, and vehicular and bicycle parking will be accommodated within the approved, zoning-compliant facilities.

The proposed development complies with the policies of the Official Plan for development within Neighbourhoods in the Outer Urban Transect. The proposed Zoning By-law amendment would implement “one lot for zoning purposes” to the entirety of the subject property, notwithstanding the approved Consent to create two separate lots for financing purposes. This policy conforms with policy 6.3.2(6) of the Official Plan and will facilitate a more logical application of the Zoning By-law to the subject property and proposed development. Similarly, it is proposed to apply residential standards to 58 Capilano, even though a non-residential use is proposed to be added. This supports a form-based approach to building design and will ensure design compatibility with the surrounding neighbourhood.

Finally, the Official Plan supports the addition of compatible non-residential uses including office-based employment within Neighbourhoods. The addition of the office use advances this policy objective while also allowing Salus to provide crucial services to the residents of the development and their clients in other neighbourhoods.

4.3 Urban Design Guidelines for Low-Rise Infill Housing

The Urban Design Guidelines for Low-Rise Infill Housing were created to fulfill design strategies of the City’s Official Plan. The proposed development was designed with reference to these design guidelines. A more complete discussion of the application of these guidelines may be found in Fotenn’s Site Plan Control Planning Rationale, dated March 10, 2023.

4.4 City of Ottawa Zoning By-law

The subject property is currently zoned Residential Fourth Density, Subzone “Z” with site-specific exception 2840 (R4Z[2840]). The purpose of the Residential Fourth Density (R4) Zone is to allow a broad mix of low-rise residential building forms ranging from detached dwellings to low-rise apartments of maximum of four (4) storeys building height. The purpose of Subzone Z is to permit different development standards which promote efficient land use and compact form while showcasing new design approaches.

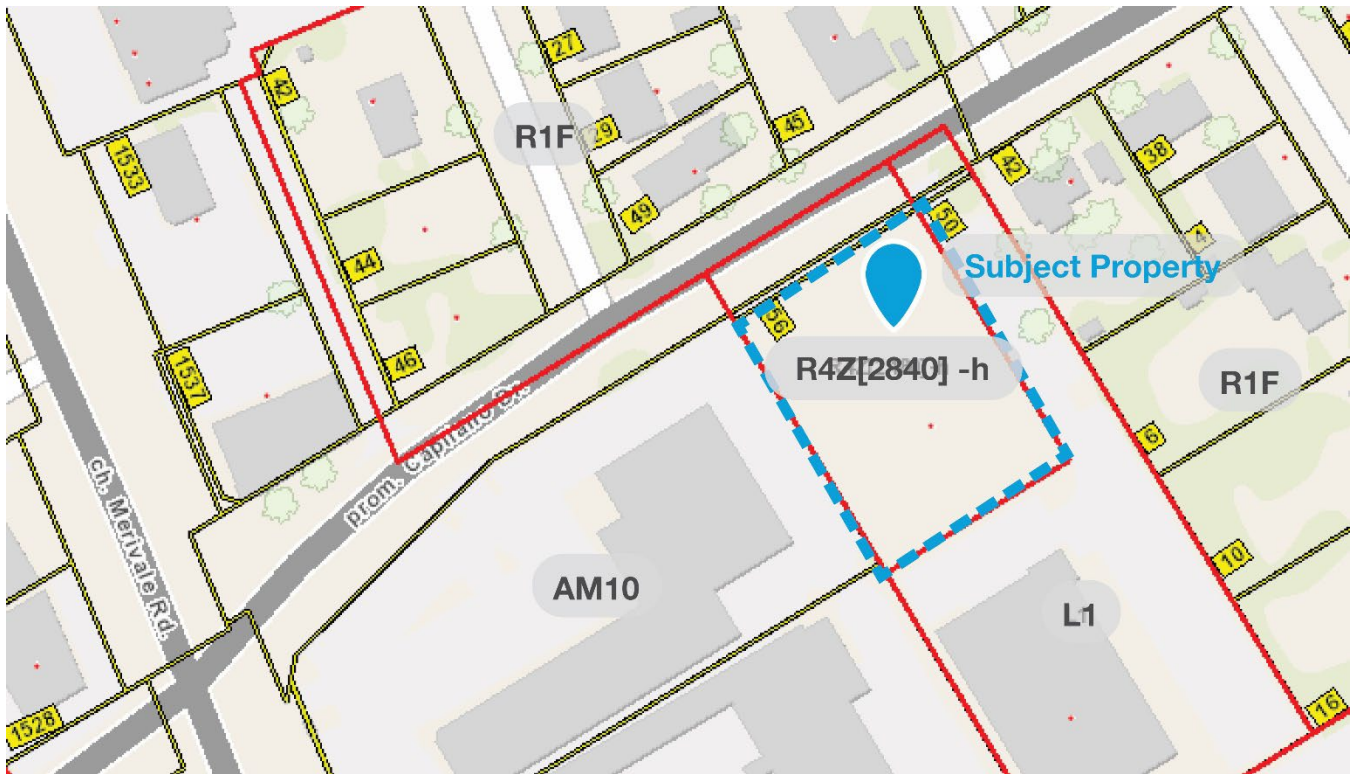


Figure 5: City of Ottawa Zoning By-law 2008-205

In order to facilitate a logical and appropriate application of the Zoning By-law for the subject property, the enclosed Zoning By-law Amendment application proposes to apply *one lot for zoning purposes* to the entirety of the land subject to Site Specific Exception 2840, regardless of whether the land is severed. Additionally, it is proposed to amend the site-specific exception so that, notwithstanding that an office use is proposed to be added as a permitted ancillary use, for the purpose of applying the by-law 58 Capilano shall be considered an apartment, low-rise.

The following table summarizes the applicable zoning performance standards, assuming that the two above-noted site-specific provisions are applied:

R4Z 2840			
Provision	Requirement	Proposed	Compliance
Minimum Lot Area (PUD)	1,400 m ²	2,774.84 m ²	✓
Minimum Lot Width (PUD)	18 m	44.86 m	✓
Minimum Front Yard Setback	Avg. of nearest lots to max of 3.0 m	3.0 m	✓
Minimum Interior Side Yard Setback	East: 1.2 for first 18 m back from street (applying to Townhouse), 7.5 m thereafter.	3.0 m (3.0 metre per approved Minor Variance)	✗
	West: 3 m (Exception 2840)	3.0 m	✓

Minimum Setback of Wall within a PUD from Private Way (S. 131)	1.8 m	1.8 m	✓	
Minimum Separation Distance between Buildings	1.2 m	17.6 m	✓	
Minimum Rear Yard Setback (Exception 2840)	4.5 m	4.5 m	✓	
Maximum Building Height	Townhouse: 11 m	6.70 m	✓	
	Low-rise Apartment: 14.5 m	13.5 m	✓	
Permitted Projections	Canopy: 1.8 m into required yard, but min 0.6 m from lot line.	1.8 m into required yard, 1.2 m from property line	✓	
Permitted Projection above Height Limit	Mechanical and Elevator Room	Apartment Block: 15.0 m	✓	
Amenity Area	6 m ² /unit (54 units) = 324 m ² Min. 50% communal, aggregated into areas of up to 54 m ²	245m ² outdoors + 285m ² indoors = 530 m ² total 100% Communal	✓	
Amenity Area Location	Not permitted within Front or Corner Side Yards and may be outside the Rear Yard.	Internal Courtyard	✓	
Front Yard Soft Landscaping	Minimum 40% (walkways may be included in calculation) Any area not occupied by walkways or driveways must be soft landscaped	>60%	✓	
Total Landscaped Area	30% of lot area for apartments.	1,146 m ² (41.3%)	✓	
Walkways	Maximum Width	Townhouse: 1.2 m Apartment 1.8 m	Townhouse: var/max 8.3 m Apartment: 1.8m	✗
	Driveway buffer	0.6 m soft landscaping	0.3 m	✗
	Maximum number	1 per yard	3 in Front Yard	✗
Waste Management	Must provide pathway (1.2-2.2 m in width) between waste storage area and street, but may be on a driveway	Driveway access provided. Waste storage interior to buildings		
Waste Collection and Loading Areas	Not required for townhouses less than 200 m ² in area	N/A	✓	

Parking Requirements

Provision	Requirement	Proposed	Compliance
Minimum Required Vehicular Parking	Resident: none required for affordable dwelling units (Exception 2840)	0 provided	✓

	Residential Visitor: 58 units @ 0.2/unit = 12 spaces Office: 163 m ² GFA @ 2.4/100 m ² GFA = 4 spaces = 16 spaces total. Reduced by 2 spaces due to shared parking discount (<i>see table below</i>)		
Parking Space Dimensions	Max 50% of spaces in lot may be reduced to 4.6x2.4 m, required visitor spaces cannot be reduced.	3 resident and one required visitor reduced to 2.6 x 4.6 m	X
Driveway Width	Minimum width of private way in PUD: 6 m	6.0 m	✓
Aisle Width	Minimum for residential use: 6 m	6.0 m (58 Capilano to be considered residential use notwithstanding ancillary office)	✓
Minimum Parking Lot Landscaping	Min. 15% of parking lot area	24.79% (360.70m ²)	✓
	Abutting a street: 3 m buffer	>3 m	✓
	Not abutting street: 1.5 m	Varies, min 1.61 m	✓
Bicycle parking	Apartment: 0.5/unit = 27 spaces Townhouse: none required Office: 1/250 m ² GFA = 1 space	14 Outdoor and 14 Indoor	✓
Bicycle Parking Dimensions	Horizontal Parking: 0.6m x 1.8m + 1.5 m access aisle	Outdoor spaces: 0.6m x 1.8m horizontal	✓
	Vertical: 0.5m x 1.5m Stacked: 0.37m x 1.5 m	Complies	
	Minimum 50% must be horizontal, or bottom spaces in stacked system.	Complies	

The calculations for shared parking reductions are included in the table below:

	Weekday				Weekend			
	morning	noon	aft	evening	morning	noon	aft	eve
Office (3.9)	100%	90%	100%	15%	20%	20%	10%	5%
Reduced #	3.9	3.51	3.9	0.59	0.78	0.78	0.39	0.2
Residential (12)	50%	50%	75%	100%	100%	100%	100%	100%
Reduced #	6	6	9	12	12	12	12	12
Cumulative Total	9.9	9.5	12.9	12.6	12.8	12.8	12.4	12.2

As identified in the zoning table, additional relief is required from several provisions of the Zoning By-law. This relief was previously granted by the Committee of Adjustment, but for greater clarity, and because application of One Lot for Zoning purposes will change the application of certain provisions, it is requested to add provisions to the site-specific exception to address these areas of zoning non-compliance.

5.0

Proposed Zoning By-law Amendment

This application seeks to update the zoning on the site to facilitate the addition of an office use. Additional site-specific provisions are requested to reflect the relief previously granted by the Committee of Adjustment and facilitate the logical and clear application of the Zoning to the subject property. The proposed additions to site-specific exception 2840 are as follows:

- / One lot for Zoning Purposes shall apply to the entirety of the lands subject to exception 2840;
- / Office use ancillary to an affordable housing development is a permitted use;
- / Notwithstanding the inclusion of ancillary office uses within a low-rise apartment building, the building will not be considered to be mixed use for the purposes of applying the zoning by-law;
- / Minimum interior side yard setback is 3 metres;
- / A total of three walkways are permitted and walkways serving a townhouse use may be 8.3 metres in width;
- / No landscaped buffer is required between a walkway and a driveway for a PUD; and
- / One required visitor space may be reduced in dimensions to 4.6 by 2.4 metres.

The requested zoning relief is relatively minor in nature and conforms with all the policies of the Official Plan. It will facilitate the inclusion of an office use, in a location where it can be appropriately accommodated. The inclusion of an ancillary office use will support the provision of affordable, supportive housing, both on the subject property and throughout the City. The other requested zoning relief is largely technical in nature, and will facilitate the clear application of the zoning by-law to an already-approved development.

6.0 Conclusion

It is our professional planning opinion that the enclosed Zoning By-law Amendment is appropriate and represents good development for the following reasons:

- / The requested zoning relief is consistent with the Provincial Policy Statement;
- / The proposed office use conforms with the policies of the Official Plan and is appropriate in the Outer Urban Transect and Neighbourhood designation;
- / The requested zoning relief is consistent with the intent of the Comprehensive Zoning By-law (2008-250) and will facilitate clear and consistent application of the zoning; and
- / The requested Zoning By-law Amendment will facilitate the provision of affordable housing, both within the approved development and by facilitating Salus's provision of services throughout the city.

Sincerely,



Bria Aird, RPP MCIP
Senior Planner



Haris Khan, MES
Planner