



October 24, 2019

Luisa Galli, Manager
Community Planning, Etobicoke York District
City Planning Division
City of Toronto
Etobicoke Civic Centre
2 Civic Centre Court, 3rd Floor
Toronto, Ontario M9C 5A3

Dear Ms. Galli,

**Re: *Planning and Urban Design Rationale Addendum Letter
Zoning By-law Amendment Application
File No. 18 150932 WET 04 OZ
250 Wincott Drive and 4620 Eglinton Avenue West, Toronto***

We are the planning consultants for Montrin Richview GP Inc. with respect to the properties municipally known as 250 Wincott Drive and 4620 Eglinton Avenue West (the “subject site”). Collectively, these properties are located at the northwest corner of Wincott Drive and Eglinton Avenue West, between Kipling Avenue and Islington Avenue, in the former City of Etobicoke. On behalf of our client, we are pleased to submit this Planning and Urban Design Rationale Addendum letter in support of the revised development proposal.

The purpose of this letter is to provide an assessment of the revised development proposal within the context of the applicable planning framework and urban design guidelines, building upon the analysis set out in our Planning and Urban Design Rationale report (dated April 2018) and our Addendum letter dated April 2019.

Through ongoing discussions with City staff, area residents and stakeholders, the approach to site organization and built form has been refined as part of the revised proposal to respond to the feedback provided since the resubmission. In our opinion, the revised proposal will create an attractive mixed-use development that fits harmoniously within the existing and planned context, and provides an appropriate transition in scale to adjacent low-rise neighbourhoods.

Description of the Revised Proposal

The revised proposal contemplates three mixed-use buildings that vary in height from 11 to 18 storeys (Building A, Building B, and Building C). The majority of the existing commercial plaza (Building D) is proposed to remain. The revised gross floor area is approximately 66,755 square metres, including 3,940 square metres of existing retail

floor space which is to be retained, 10,012 square metres of new retail uses and 605 dwelling units.

Between Building B and Building C, there is a proposed POPS with an area of approximately 659 square metres, as described below. To the north of the POPS is a small vehicular pick-up/drop-off courtyard that provides access to the underground garage and loading areas. The courtyard contains 16 surface parking spaces for visitors. The POPS and courtyard are approximately 41 metres wide, providing a generous separation distance between Building B and Building C, while also helping to maintain views of the existing Richview Square from Eglinton Avenue West.

As with the April 2019 resubmission and the original proposal, the revised proposal is organized around an “L”-shaped private road that connects from the Wincott Drive/Waterford Drive intersection to Eglinton Avenue West, approximately in the same location as the existing private driveway. As set out in our Planning and Urban Design Rationale, the proposed private road will be designed to appear and function in the same manner as a public street.

The following provides a summary of the key site organization and built form changes that have been incorporated as part of the revised proposal:

Building A

Building A is a “tower and base” tall building that is generally in keeping with the built form approach contemplated as part of the previous submissions. The height of Building A is proposed to decrease from 20 to 18 storeys (60.3 metres plus mechanical penthouse). It will be a mixed-use/residential building with a gross floor area of approximately 14,193 square metres. The proposed building is comprised of a 2-storey base building element that contains grade-related retail uses and townhouse units, with residential apartment units above. Access to the underground garage and loading areas is located on the northern portion of the ground floor, generally in the same location as with the original proposal.

The tower floor plate for Building A is approximately 782 square metres between Level 5 and Level 11 and 747 square metres at Level 12 and above. The tower element maintains a setback of 12.5 metres to the west property line and 12.5 metres to the south property line, abutting 4650 Eglinton Avenue East. To the north, the tower element of the building is located approximately 71.4 metres to the south of the low-rise residential neighbourhood fronting onto Widdicombe Hill to the northwest, and falls entirely within a 45-degree angular plane.

Building B

Building B is a 12-storey mixed-use building that contains grade-related retail uses and residential dwelling units above. From a built form perspective, Building B is comprised of two visually distinct components: a 2-storey retail/commercial base element (14.0 metres) and a 10-storey mid-rise element, with a total height of 45.6 metres excluding the mechanical penthouse, which forms an inverted “L”-shaped floorplate. Building B is set back approximately 24.0 metres from the property line along Eglinton Avenue West.

The 2-storey base element is oriented in a north-south direction perpendicular to Eglinton Avenue West. The southern and northern portions of the ground floor contain grade-related retail uses as well as a retail lobby that leads up to the full-floor commercial uses on Level 2. Above the base building, the mid-rise element forms an “L”-shape between Level 3 and Level 12. To the east and west, the mid-rise element is stepped back approximately 7.2 metres from the base building, helping to create a visually distinct base element.

Building C

Building C is a 11-storey mixed-use building that contains grade-related retail uses and residential dwelling units above. From a built form perspective, Building C is comprised of two visually-distinct components: a 2-storey retail base element (14.0 metres) and a 9-storey mid-rise element, with a total height of 42.3 metres excluding the mechanical penthouse, which forms an inverted “L”-shaped floorplate.

The 2-storey base element is oriented in a north-south direction perpendicular to Eglinton Avenue West. The southern and northern portions of the ground floor contain grade-related retail uses as well as a retail lobby that leads up to the full-floor retail uses on Level 2. Above the base building, the mid-rise element forms an “L”-shape between Level 3 and Level 11. To the east, the mid-rise element is stepped back by approximately 16.1 metres from the base building, helping to create a visually distinct base element.

Building D

The majority of the existing retail building is proposed to remain (approximately 3,940 square metres) and approximately 276 square metres will be added to the eastern end of the building, adjacent to Wincott Drive. As part of the proposed development, an extensive renovation of the existing plaza will be undertaken.

Park and Open Spaces

A new public park is proposed along the Eglinton Avenue West frontage of the subject site, comprising an area of approximately 1,700 square metres (0.42 acres) and is unchanged from the April 2019 resubmission.

A privately-owned, publicly-accessible open space (“POPS”) is proposed adjacent to the public park, which will provide a visual extension of the public realm into and through the development. The POPS has been reduced modestly to an area of approximately 659 square metres, and is envisioned to complement the design and programming of the proposed park.

Table 1: Summary Comparison of Development Statistics

	Original Proposal (April 2018)	Revised Proposal (April 2019)	Revised Proposal (Oct. 2019)
Building Height (storeys)			
<i>Building A</i>	16	20	18
<i>Building B</i>	22	12/19	12
<i>Building C</i>	22	12	11
<i>Building D</i>	1	1	1
<i>Building E</i>	N/A	12	-
Building Height (metres)*			
<i>Building A</i>	54.3 m	66.3 m	60.3 m
<i>Building B</i>	76.3 m	67.0 m	45.6 m
<i>Building C</i>	76.3 m	46.0 m	42.3 m
<i>Building D</i>	7.0 m	7.0 m	7.0 m
<i>Building E</i>	N/A	43.0 m	-
Gross Floor Area			
<i>Proposed Residential GFA</i>	60,298 m ²	64,536 m ²	52,803 m ²
<i>Proposed Retail GFA</i>	11,162 m ²	9,213 m ²	10,012 m ²
<i>Retained Retail GFA</i>	4,065 m ²	4,215 m ²	3,940 m ²
<i>TOTAL Proposed GFA</i>	75,525 m ²	77,964 m ²	66,755 m ²
Floor Space Index (“FSI”)	2.48	2.56	2.19
Dwelling Units			
<i>1-Bedroom</i>	336	492	355
<i>2-Bedroom</i>	268	198	182
<i>3-Bedroom</i>	67	83	68
<i>TOTAL Dwelling Units</i>	671	773	605
Public Realm			
<i>Parkland</i>	0 m ²	1,700 m ²	1,700 m ²
<i>POPS</i>	492 m ²	869 m ²	659 m ²
Amenity Areas			
<i>Indoor Amenity</i>	1,335 m ²	1,646 m ²	1,245 m ²
<i>Outdoor Amenity</i>	3,374 m ²	1,485 m ²	1,280 m ²
Vehicular Parking			
<i>Resident Spaces</i>	671	681	521
<i>Visitor/Commercial Spaces</i>	617	332	437

<i>TOTAL Parking Spaces</i>	1,288	1,013	958
Bicycle Parking Spaces	650	760	512

*All measurements exclude mechanical penthouse.

Policy and Regulatory Context

The policy and regulatory context applicable to the subject site is largely unchanged since the original application in April 2018 and the resubmission in April 2019. However, the Growth Plan for the Greater Golden Horseshoe (2017) has been replaced with the new 2019 Growth Plan, as described below. As well, a new Regional Transportation Plan has been issued, replacing “The Big Move”.

The new Growth Plan (A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect as of May 16, 2019. The Growth Plan (2019) includes significant new policies addressing employment areas, designated greenfield areas and settlement area boundary expansions. Within “strategic growth areas”, including “urban growth centres” and “major transit station areas”, minor policy adjustments have been made to strengthen the applicable intensification policies.

The subject site would be considered to be part of a “strategic growth area” pursuant to the 2019 Growth Plan (i.e. a focus for accommodating intensification and higher-density mixed uses in a more compact built form). “Strategic growth areas” include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. The subject site falls within the definition of a “major transit station area” (i.e. immediately adjacent to the planned Wincott station on the Eglinton West LRT line). In this latter respect, the Growth Plan (2019) amends the definition of “major transit station area” to include the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.

Policy 2.2.1(2)(c) provides that, within settlement areas, growth will be focused in delineated built-up areas, strategic growth areas, locations with existing or planned transit (with a priority on higher order transit where it exists or is planned), and areas with existing or planned public service facilities. Policy 2.2.1(3)(c) directs municipalities to undertake integrated planning to manage forecasted growth to the horizon of this Plan, which will, among other things, provide direction for an urban form that will optimize infrastructure, particularly along transit and transportation corridors, to support the achievement of complete communities through a more compact built form.

In this respect, Schedule 3 of the Growth Plan (2019) continues to forecast a population of 3,190,000 and 1,660,000 jobs for the City of Toronto by 2031, increasing to 3,400,000 and 1,720,000, respectively, by 2041. The 2016 Census indicates that

population growth in Toronto is continuing to fall short of the Growth Plan forecasts. At a point that is now half-way through the 2001-2031 forecast period, the 2016 population of 2,822,902 (adjusted for net Census undercoverage) is only 38.8% of the way toward achieving the population forecast of 3,190,000 by 2031.

Policy 2.2.1(4) provides that applying the policies of the Growth Plan will support the achievement of complete communities that, among other things, feature a diverse mix of land uses, provide a diverse range and mix of housing options, expand convenient access to a range of transportation options, provide for a more compact built form and a vibrant public realm, including public open spaces, and mitigate and adapt to climate change impacts and contribute to environmental sustainability.

Policy 2.2.2(3) requires municipalities to develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will, among other things, identify strategic growth areas to support achievement of the intensification target and recognize them as a key focus for development, identify the appropriate type and scale of development in strategic growth areas and transition of built form to adjacent areas, and encourage intensification generally throughout the delineated built-up area.

The Growth Plan (2019) includes some re-wording of the policies applying to “major transit station areas”. Policy 2.2.4(2) requires the City of Toronto to delineate the boundaries of “major transit station areas” on priority transit corridors or subway lines “in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station” (our emphasis). Policy 2.2.4(3)(a) goes on to require that “major transit station areas” served by light rail or bus rapid transit be planned for a minimum density target of 160 residents and jobs combined per hectare.

Policy 2.2.4(5), added by the Growth Plan (2019), allows municipalities to delineate the boundaries of “major transit station areas” and identify minimum density targets for “major transit station areas” in advance of the next municipal comprehensive review, provided it is done in accordance with subsections 16(15) or (16) of the *Planning Act*.

Policy 2.2.4(6) states that, within major transit station areas on priority transit corridors or on subway lines, land uses and built form that would adversely affect the achievement of the minimum density targets will be prohibited. Policy 2.2.4(9) provides that, within all “major transit station areas”, development will be supported, where appropriate, by:

- planning for a diverse mix of uses to support existing and planned transit service levels;
- providing alternative development standards, such as reduced parking

- standards; and
- prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities.

Other applicable policies of the 2019 Growth Plan, which remain unchanged from those of the 2017 Growth Plan, are discussed in Section 4.3 of our Planning and Urban Design Rationale report.

Based on the foregoing analysis, it is our opinion that the revised proposal conforms with the Growth Plan (2019) and, in particular, the policies encouraging growth and intensification in “strategic growth areas”, including “major transit station areas”.

Planning and Urban Design Analysis

Intensification

As set out in our Planning and Urban Design Rationale report, it is our opinion that residential/mixed-use intensification on the subject site is supportive of numerous policy directions set out in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the 2041 Regional Transportation Plan and the City of Toronto Official Plan, all of which promote intensification on sites that are well served by municipal infrastructure, including planned higher order public transit.

Intensification in proximity to higher order transit as a tool to better integrate transportation and land use planning is reinforced as a key policy direction in the 2041 RTP. Specifically, the 2041 RTP seeks to make investments in higher order transit contingent on the achievement of transit-supportive densities, with an emphasis on focusing development in major transit station areas along priority transit corridors, such as the subject site.

The revised proposal seeks to facilitate the redevelopment of an underutilized commercial plaza, surface parking lots and vacant land into a significant mixed-use destination adjacent to the planned Wincott station on the Eglinton West LRT line and in proximity to existing frequent transit. An alternative approach to built form as part of the revised proposal achieves this same objective, while creating appropriate and desirable built form relationships, as described below.

Land Use

The proposed mixed-use development conforms with the land use permissions in the Official Plan and the City-wide Zoning By-law 569-2013, both of which permit a broad range of commercial and residential uses, as outlined in our Planning and Urban Design Rationale report.

In addition to the retail and residential uses proposed as part of the original submission, the revised proposal incorporates a proposed public park and a POPS along Eglinton Avenue West.

Height, Massing and Density

In our opinion, and as noted in our original Planning and Urban Design Rationale report, the subject site is an appropriate location for significant intensification in land use policy terms. From a built form perspective, the subject site is a contextually appropriate location for a mix of mid-rise and tall buildings given its location on the planned Eglinton West LRT line immediately adjacent to the future Wincott station, as well as its proximity to existing mid-rise and tall buildings that extend along the north side of Eglinton Avenue West between Highway 427 to the west and Scarlett Road to the east.

With respect to building heights, they have been reorganized as part of the revised proposal, so that the tallest building elements are generally located within the interior/central portion of the subject site, away from adjacent *Neighbourhoods*, stepping down to mid-rise and low-rise elements adjacent to public streets and the proposed public park and POPS.

Building A has been reduced from 20 storeys to 18 storeys (60.3 metres excluding mechanical penthouse) and is located adjacent to the west property line, abutting the *Apartment Neighbourhoods* designation to the west. Similarly, Building B has been reduced from 19 storeys to 12 storeys (45.6 metres). Building C has been reduced to an 11-storey building and the measured height has been reduced from 46.0 metres to 42.3 metres. The height of all three buildings fall within a 45-degree angular plane measured from the adjacent *Neighbourhoods* designation.

From an urban structure perspective, it is our opinion that the proposed heights of the three buildings will fit harmoniously within the existing and planned context of building heights along Eglinton Avenue West, which range from 11 storeys up to 25 storeys. Additionally, the proposed tower elements are generally in keeping with the height of existing and approved tall buildings adjacent to the Eglinton Avenue West and Kipling Avenue intersection, which range from 14 storeys to 18 storeys.

As noted in our Planning and Urban Design Rationale report and Addendum letter report, one of the key characteristics of the existing built context is the proximity of tall apartment buildings to low-rise residential dwellings, often located on opposite sides of the same public street. In this regard, the tall building element of Building A is located approximately 69.9 metres south of the nearest rear yards of detached dwellings in the adjacent *Neighbourhoods* designation with an 11-storey apartment building to the northwest and the existing one-storey commercial plaza to the north.

The heights of Building B (12 storeys) and Building C (11 storeys) are generally in keeping with the height of existing buildings in the surrounding area, including the 9-storey seniors' apartment building at 4650 Eglinton Avenue West, which is under construction, and the three 11-storey "tower in the park" apartment buildings at 25-35 Widdicombe Hill (two existing, one approved). The proposed height of these two buildings generally maintain a 1:1 ratio with the planned 45 metre right-of-way width of Eglinton Avenue West.

The 11-storey mid-rise element of Building C forms an "L"-shaped floor plate. The northern portion of the mid-rise element is set back 19.0 metres from the Wincott Drive property line and falls within a 45-degree angular plane measured from the nearest detached dwelling in the *Neighbourhoods* designation. The southern portion of the mid-rise element of Building C is entirely located to the south of Waterford Drive and is directly opposite a commercial plaza at 265 Wincott Drive and the vacant lands fronting onto Eglinton Avenue West.

From a massing perspective, Building A continues to reflect a "tower and base" typology with a 2-storey base element that will help to frame the adjacent private streets at an appropriate scale. Building setbacks and setbacks, including a "reveal" above Level 4, will help to reduce the overall visual impact of the tower element and reinforce the pedestrian scale of the base element.

Building B and Building C have been organized into two visually distinct components: a 2-storey (14.0 metre) base building and a mid-rise element between Level 3 and Level 11/Level 12. Generous building setbacks above Level 2 help to distinguish the base buildings from the mid-rise elements, helping to reduce the visual impact of the massing, framing the proposed public park and adjacent public streets with good proportion, and providing an appropriate transition in scale down to lower-scale *Neighbourhoods*.

From a density perspective, it is our opinion that the proposed density of 2.19 FSI is appropriate and desirable. The proposed density has been reduced from the original proposal (FSI 2.48) and the revised proposal (FSI 2.56) and has been organized to achieve a number of specific built form objectives and to result in no unacceptable built form impacts.

As articulated in our Planning and Urban Design Rationale report, it is important from the perspective of integrating land use and transportation to optimize the density on the subject site given its proximity to the planned Eglinton West LRT and adjacent to the future Wincott station. The importance of optimizing densities for new development in proximity to higher order transit is reinforced through both the 2019 Growth Plan and the new 2041 RTP. Additionally, the proposed development is appropriate within the context of approved densities in the area, which are higher than the proposed density, ranging from 2.67 FSI (25-53 Warrender Avenue), 3.36 FSI for

4650 Eglinton Avenue West and 4.9 FSI for the recently approved multi-phase development at 4000 Eglinton Avenue West.

Built Form Impacts

Light, View and Privacy

Light, View and Privacy (“LVP”) impacts are generally addressed through a combination of spatial separation, setbacks, building orientation and mitigating measures between buildings. The revised proposal is evaluated below with respect to the relevant LVP criteria and directions set out in the City-wide Tall Building Design Guidelines and the Avenues and Mid-Rise Buildings Study, as summarized in our Planning and Urban Design Rationale.

With respect to the proposed tower elements, appropriate setbacks and separation distances are incorporated as part of the revised proposal. For Building A, the tower element is set back 12.5 metres from the western property line and 12.5 metres from the southern property line. These setbacks are in keeping with the City-wide Tall Building Design Guidelines and are sufficient to provide access to sunlight without encumbering future development on adjacent properties.

As noted above, the tower element of Building A is compliant with a 45-degree angular plane and is located approximately 69.9 metres south of the nearest *Neighbourhoods*. There are intervening buildings between the building and the *Neighbourhoods* designation, all of which helps to ensure that there will be no unacceptable LVP impacts resulting from the building.

Building B is located within the central portion of the subject site, approximately 20.8 metres from the western property line and 24.0 metres from the southern property line adjacent to Eglinton Avenue West. Building B complies with a 45-degree angular plane measured from the nearest designated *Neighbourhoods*. The proposed setbacks will ensure that the tower elements of Building B will create no unacceptable LVP impacts.

Building B and Building C are separated by a distance of approximately 41.0 metres, which is sufficient to maintain acceptable LVP conditions between dwelling units. Additionally, Building C is located approximately 33.0 metres to the southwest of the nearest dwelling in the *Neighbourhoods* designation, which is sufficient to ensure that there are no unacceptable LVP impacts created as a result of the proposed development

Shadow Impacts

In support of the revised proposal, an updated Shadow Study was prepared by CORE Architects Inc. in accordance with Policies 3.1.2(3) and 4.5(2) of the Official Plan. In particular, the Shadow Study focuses on shadow impacts during the spring and fall equinoxes on March 21st/September 21st, at each hour between 9:18 AM and 6:18 PM, with particular attention to the impacts on designated *Neighbourhoods* and *Parks*.

Shadow impacts from Building A on March 21st / September 21st are largely subsumed within the shadows from the existing building at 25 Widdicombe Hill. Building A only creates shadows on a small portion of the front yards of the detached dwellings at 12 and 14 Widdicombe Hill at 9:18 AM and the front yard of 10 Widdicombe Hill at 10:18 AM. In the late afternoon, Building A creates shadows on the side yard of the dwelling at 255 Wincott Drive only at 5:18 PM. Building A creates no shadow impacts on *Neighbourhoods* on June 21st.

Building B and Building C result in incremental shadowing on lands designated *Neighbourhoods* only in the late afternoon on March 21st and September 21st. In this regard, the shadows from Building B are largely subsumed within the shadows created by Building C. In particular, Building C shadows a small portion of the front yard of the dwelling at 255 Wincott Drive at 3:18 PM. By 5:18 PM, Building C creates shadows on the front and rear yards of three dwellings located on the south side of Waterford Drive. By 6:18 PM, the proposed buildings create shadows on the rear yards of 11 dwellings located on the south side of Waterford Drive. There are no shadows on *Neighbourhoods* resulting from Building B and Building C on June 21st.

Based on the foregoing, it is our opinion that the incremental shadows resulting from the revised proposal are adequately limited in accordance with the Official Plan, and reflect an improved condition relative to the shadows created by the original proposal.

With respect to parks, Policy 3.1.2(3)(f) of the Official Plan requires new development to minimize any additional shadowing as necessary to preserve their utility. As illustrated in the Shadow Study, the revised proposal will create incremental shadowing on the northern portion of the proposed on-site park only at 6:18 PM on March 21st and September 21st and after 5:18 PM on June 21st.

Urban Design

From an urban design perspective, it is our opinion that the revised proposal will contribute to the creation of an attractive and inviting pedestrian environment within and adjacent to the subject site. The proposed public park and POPS, together with a network of private streets that will be designed to appear and function as public

streets, will help to ensure that the revised proposal will fit harmoniously within its existing and planned context.

The built form changes contemplated as part of the revised proposal are intended to achieve a number of objectives, including:

- organizing taller building elements on the interior/central portions of the subject site, located away from designated *Neighbourhoods* and within a 45-degree angular plane;
- providing a transition in scale to adjacent *Neighbourhoods* through the stepping down of heights to ensure that incremental shadows are adequately limited;
- incorporating building setbacks, stepbacks and separation distances that help to break up the massing of the proposed buildings and minimize LVP impacts;
- organizing the base of buildings and mid-rise elements to frame adjacent public streets and the proposed public park with good proportion and at an appropriate scale; and
- incorporating publicly-accessible amenities, such as the POPS and private streets, that will be visually integrated with the adjacent public realm and the proposed public park.

Based on the foregoing, it is our opinion that the design and organization of the revised plans are appropriate and desirable in urban design terms and conform with the applicable policies of the Official Plan, including Policies 3.1.2(1), 3.12(2), 3.1.2(3), 3.1.2(4), 3.1.2(5), 3.1.3(2) and 4.5(2), as well as being in keeping with the applicable urban design guidelines set out in the Avenues and Mid-Rise Buildings Study and the City-wide Tall Building Design Guidelines.

Summary Opinion

Based on the analysis set out above in conjunction with the analysis set out in our original Planning and Urban Design Rationale report (April 2018), it is our opinion that the revised proposal is appropriate and desirable in both land use planning and urban design terms. It is our opinion that the proposed development is in keeping with the planning and urban design framework set out in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the 2041 Regional Transportation Plan and the City of Toronto Official Plan, as well as the applicable urban design guidelines.

The revised proposal will provide for residential/mixed-use intensification on an underutilized site in proximity to the planned Wincott station on the Eglinton West LRT line. The revised proposal will create an attractive mixed-use destination with a new public park and POPS that fits harmoniously within the existing and planned context, provides an appropriate transition in scale to low-rise adjacent neighbourhoods, and

creates no unacceptable built form impacts with respect to light, views, privacy or shadowing.

Thank you for your consideration of this revised development proposal. Should you have any questions or comments, please do not hesitate to contact me or Allison Chewter of our office at any time.

Yours very truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP