May 23, 2025

This document is presented in the language it was provided. Ce document est présenté dans la langue dans laquelle il a été fourni.

Mr. Michel Bellemare

Secretary-Treasurer Committee of Adjustment 101 Centrepointe Drive, Fourth Floor Ottawa, ON K2G 5K7

RE: Application for Minor Variance 177 Compton Avenue, Ottawa

Dear Mr. Bellemare,

Fotenn Planning + Design ("Fotenn") has been retained by Onyx Design Build ("the Client") to prepare a Planning Rationale for a Minor Variance application to permit a 3-storey, 8-unit apartment building at 177 Compton Avenue ("subject site") in the Woodpark community of the City of Ottawa.

The subject site is currently occupied by a single storey residential building and associated driveway. The proposed variances are required to reduce the minimum lot width, minimum lot area, minimum front yard setback and minimum rear yard setback. These variances have been assessed against the Four Tests of the Planning Act, and our determination is that the variances can satisfy these tests and are therefore appropriate and in the public interest.

Please find enclosed the following material in support of the application:

- / This cover letter explaining the nature of the application (1 copy):
- / Minor Variance application form (1 copy);
- / Site Plan (1 full size copy, 1 reduced);
- / Survey Plan (1 full size copy, 1 reduced);
- Tree Information Report, dated May 6<sup>th</sup>, 2025, prepared by Independent Tree Care Inc. (1 copy);
- Cheque in the amount of \$3,446.00 made payable to the City of Ottawa.

Please contact the undersigned at <u>ouseley@fotenn.com</u> and <u>bolduc@fotenn.com</u> with any questions or requests for additional material.

Sincerely,

Mark Ouseley, MES Planner Jacob Bolduc, RPP MCIP Associate

**FOTENN** 

Committee of Adjustment
Received | Reçu le

2025-05-23

City of Ottawa | Ville d'Ottawa

Comité de dérogation

Ottawa

420 O'Connor Street Ottawa, ON K2P 1W4 613.730.5709

Kingston

The Woolen Mill 4 Cataraqui Street, Suite 315 Kingston, ON K7K 1Z7 613.542.5454

Toronto

174 Spadina Avenue, Suite 304 Toronto, ON M5T 2C2 416.789.4530

fotenn.com

1.0

# **Background and Context**

Fotenn Planning + Design ("Fotenn") has been engaged by Onyx Design Build ("the Client") to prepare this Planning Rationale in support of a Minor Variance application for the subject site, municipally known as 177 Compton Avenue in the City of Ottawa.

The subject site is a rectangular lot with a total area of 464.95 square metres and a frontage of 15.26 metres along Compton Avenue. The subject site is currently occupied by a single-storey residential building and associated driveway and garage. One mature tree is located in the rear yard of the property.



Figure 1: Subject Site and surrounding context

## 1.1 Surrounding Area

**North:** Immediately north of the subject site is a two (2) storey semi-detached residential dwelling. Further north is a Hulse, Playfair & McGarry Funeral Chapel as well as Byron Avenue and Richmond Road. Richmond road is classified as an arterial road. Abutting Richmond Road is a high-rise apartment building.

**East:** Immediately east of the subject site is low-rise residential housing fronting Woodroffe Avenue. Woodroffe Avenue is classified as an arterial road. Housing typologies along Woodroffe Avenue range from single detached to three (3) storey semi-detached housing. A low-rise apartment building is located east of Woodroffe Avenue as well as single-storey detached dwellings. Further east is Woodroffe Park and Wading Pool.

**South:** South of the subject site are low-rise residential dwellings in a neighbourhood configuration. Housing typologies include detached, semi-detached dwellings and a duplex.

**West:** Immediately west of the site is Compton Avenue. Further west is a residential neighbourhood featuring detached and semi-detached dwelling typologies. The future Transit Station of New Orchard is located west of the subject site along Richmond Road.



Figure 2: Subject site and surrounding context including the proposed transit station.

**2.0** 3

# **Overview of Application**

## 2.1 Proposed Development

The applicant is proposing to demolish the existing detached dwelling and construct a stacked 3-storey residential building comprised of eight (8) three (3) bedroom units. The proposed development fronts onto Compton Avenue with landscaping along the majority of the front yard and communal amenity space proposed in the rear yard. Waste management and bicycle storage is proposed via an enclosure in the rear yard. There is no vehicle parking proposed.

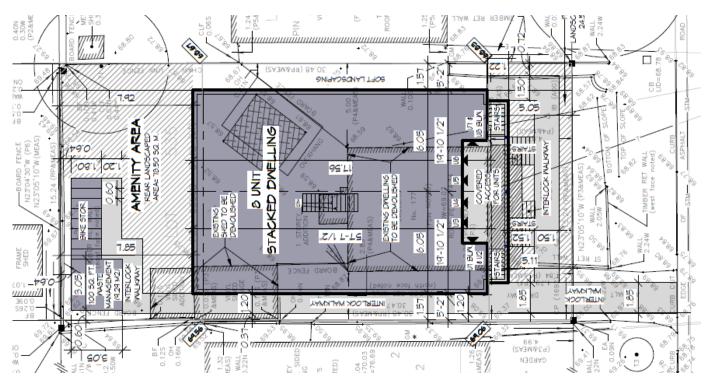


Figure 3: Site Plan of proposed development.

A walkway is proposed to the north of the building which provides access from the front of the building to the refuse storage bins and bicycle storage at the rear.

The building's stacked configuration uses space efficiently by avoiding the use of internal hallways. Each unit is accessed via a front door located at the front of the building.



Figure 4: Front elevation of proposed building.

#### 2.2 Tree Information Report

A Tree Information Report, prepared by Independent Tree Care indicates that the proposed building can be constructed while retaining the existing tree in the rear yard of the site and protecting other trees nearby. The Norway maple in the rear yard is in good condition and can be protected during construction through the use of tree protective fencing erected 3.05 meters from the base of the tree.

### 2.3 Proposed Minor Variances

The property is located within the Residential Fourth Density, Subzone D (R4D) zone. While broadly complying with the applicable provisions, in order to proceed with the development, the following minor variances are required:

- To permit a minimum lot width of 15.24 metres, whereas the By-law requires a minimum lot width of 22 metres for a stacked dwelling (Table 162A(IV) of City of Ottawa's Comprehensive Zoning By-law (2008-250)); and
- To permit a minimum lot area of 464.67 square metres, whereas the By-law requires a minimum lot area of 660 square metres for a stacked dwelling (Table 162A(V) of City of Ottawa's Comprehensive Zoning By-law (2008-250)); and

- To permit a minimum front yard setback of 5.05 metres, whereas the By-law requires a minimum front yard setback of 6 metres (Table 162A(VII) of City of Ottawa's Comprehensive Zoning By-law (2008-250)); and
- To permit a minimum rear yard setback of 7.85 metres, whereas the By-law requires a minimum setback that is 28% of lot depth, (which for a lot depth of 30.47 metres is 8.53 metres) (Section 144(3)(a)(ii)(iii) of City of Ottawa's Comprehensive Zoning By-law (2008-250)).

An assessment of these variances in relation to the Four Tests of the Planning Act is provided later in this report, following the policy and regulatory overview.

## 3.0

# **Policy and Regulatory Review**

## 3.1 Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS) provides direction on matters of provincial interest related to land use planning and development. The Planning Act requires that decisions affecting planning matters "shall be consistent with" policy statements issued under the Act, which includes the PPS.

The PPS came into effect October 20, 2024, and consolidates the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) into a more streamlined land-use planning policy for the Province of Ontario. The PPS provides policy direction for housing supply in the province, supporting development and alignment with infrastructure. It also provides policy direction on opportunities for job creation and economic development, increasing the supply of developable land, protections for the environment and natural resources, and protections for communities, resources, and properties from natural and man-made hazards.

The following PPS policies are applicable to the subject property, among others:

### **Planning for People and Homes**

- 2.1.6 Planning authorities should support the achievement of complete communities by:
  - / accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

#### Housing

- 2.2.1 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:
  - a) permitting and facilitating:
    - all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
    - all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

#### **Settlement Areas and Settlement Area Boundary Expansions**

- 2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:
  - a) efficiently use land and resources;
  - b) optimize existing and planned infrastructure and public service facilities;

- c) support active transportation;
- d) are transit-supportive, as appropriate [...]
- 2.4.1.2 To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:
  - a) to accommodate significant population and employment growth;
  - b) as focal areas for education, commercial, recreational, and cultural uses; to accommodate and support the transit network and provide connection points for inter- and intra-regional transit [...]

The Minor Variance application and the resulting proposed development on the subject property are consistent with the Provincial Planning Statement (2024) in that it achieves its vision in addressing efficient development and land use patterns. The proposed development is aligned with the policies of the PPS in that the applications provide the opportunity for increased densities within the serviced urban area in proximity to rapid transit, contributing to the ongoing evolution and creation a complete community.

## 3.2 City of Ottawa Official Plan (2022)

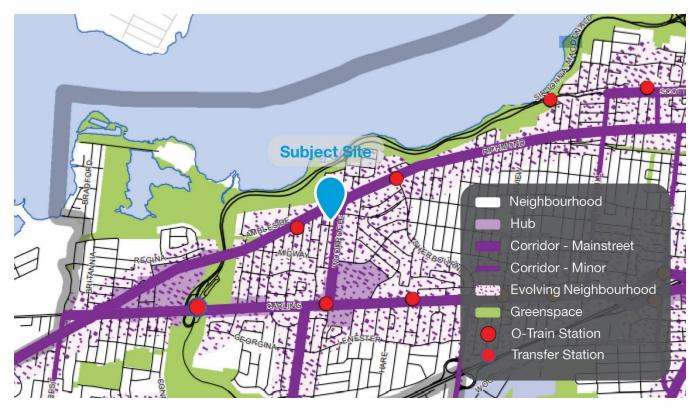


Figure 5: Schedule B2 - Inner Urban Transect, City of Ottawa Official Plan.

The Official Plan for the City of Ottawa was approved by the Ministry of Municipal Affairs and Housing (MMAH) on November 4, 2022. The Plan provides a framework for the way that the City will develop until 2046 when it is expected that the City's population will surpass 1.4 million people. The Official Plan directs the manner that the City will accommodate this growth over time and set out the policies to guide the development and growth of the City.

The Official Plan provides guidance for development across the Ottawa region, highlighting specific desired features, such as 15-minute neighbourhoods, and other intensification targets aimed at improving the walkability and sustainability of existing built-up areas. The Official Plan encourages infill and intensification through the development of various housing types, such as missing middle housing, within existing neighbourhoods in the City's urban areas.

#### 3.2.1 Inner Urban Transect

The subject site is located within the "Inner Urban Transect" of the Official Plan (Figure 5). The Inner Urban Transect includes the pre-World War II neighbourhoods that immediately surround the Downtown Core, and the earliest post-World War II areas directly adjacent to them. Generally, the older neighbourhoods reflect the urban built form characteristics, including shallow front yard setbacks and in some contexts zero front yards with an emphasis on built-form relationship with the public realm. The focus in these areas will be to enhance or establish an urban pattern of built form, site design and mix of uses, while simultaneously prioritizing walking, cycling and transit within, and to and from the Inner Urban Transect.

- / Per Policy 3(a) of Section 5.2.1 of the Official Plan, the Inner Urban Transect is planned for mid- to high-density development, subject to proximity and access to frequent street transit or rapid transit.
- Per Policy 5 of Section 5.2.1, the Inner Urban area is planned for mid- to high-density, urban development forms where either no on-site parking is provided, or where parking is arranged on a common parking area, lot or parking garage accessed by a common driveway.
- / Per Policy 3 of Section 5.2.2, Motor vehicle parking in the Inner Urban Transect shall be managed as follows:
  - d) Where new development is proposed to include parking as an accessory use, such parking:
    - i. Shall be hidden from view of the public realm by being located behind or within the principal building, or underground;
    - Shall be accessed by driveways that minimize the impact on the public realm and both City-owned trees and privately-owned distinctive trees, and result in no net increase in vehicular private approaches; and
    - iii. May be prohibited on small lots or where parking cannot reasonably be accommodated in a manner consistent with the intent of this Plan.

Due to the inability to screen parking at the rear of the building and the long driveway that would be required to facilitate this parking and the proximity of the subject site to the New Orchard Transit Station, planned parking was eliminated in favour of increased bicycle parking and pedestrian access on site.

#### 3.2.2 Neighbourhood Designation

The subject site is designated "Neighbourhood" in the Official Plan.

- Per Policy 4(b) of Section 5.2.1 of the Official Plan, the Inner Urban Transect shall continue to develop as a mixed-use environment, where small, locally oriented services may be appropriately located within Neighbourhoods.
- / Per Section 5.2.4, Neighbourhoods located in the Inner Urban area and within a short walking distance of Hubs and Corridors shall accommodate residential growth to meet the Growth Management Framework. The Zoning By-law shall implement the density thresholds in a manner which adheres to the built form requirements as described in Subsection 5.6.1, as applicable and that:
  - c) Provides for a low-rise built form, by requiring in Zoning a minimum built height of 2 storeys, permitting 3 storeys, and where appropriate allow a built height of up to 4 storeys to permit higher-density low-rise residential development.

Section 3.2 (Support Intensification) of the Official Plan includes direction for all areas of the City to accommodate new "large-household dwellings", generally defined as 3-bedrooms units or their equivalent in size, typically in ground-oriented building forms, as per Policy 8 of this same section. As per Table 3b, the Neighbourhood designation includes a target of 50% large-

household dwellings for new low-rise buildings. All eight (8) proposed units are large 3-bedroom units, largely due to the "stacked dwelling" typology whereby all units have their own external entrance to the unit rather than internal corridors which affect the overall floorplan efficiency.

With respect to building design, Policy 6 of Section 4.6.6 notes that low-rise buildings shall be designed to respond to context and transect area policies, and shall includes areas for soft landscaping, main entrances at grade, front porches or balconies, and that building shall integrate architecturally to complement the surrounding context. The proposed stacked dwelling is similar in size and massing to a low-rise apartment dwelling, but makes efficient use of a stacked-dwelling arrangement whereby each of the eight (8) units has direct, ground-oriented access, thereby making for a more efficient internal layout that can accommodate large-household units.

#### 3.2.3 Evolving Overlay

An Evolving Neighbourhood Overlay is applied to the subject site and surrounding area. The area shall evolve to create the opportunity to achieve an urban form in terms of use, density, built form and site design. The Zoning By-law shall provide development standards for the built form and buildable envelope consistent with the planned characteristics of the overlay area, which may differ from the existing characteristics of the area to which the overlay applies.

The proposed development conforms to the policies within the Inner Urban Transect, as it provides eight (8) residential units in proximity (within 300 metres) of a rapid transit station. No vehicle parking has been included in the site design to encourage sustainable modes of transportation. Further, the proposed development is 3-storeys in height, which conforms to the general height provisions for the Neighbourhood designation. The Evolving Neighbourhood Overlay is applied to the subject site and indicates the area is subject to gradual change in both built form and density, such as that proposed herein.

The proposed minor variances maintain the general intent and purpose of the Official Plan. The proposed development includes large-household units in the height range of the Neighbourhood designation, has been designed in a manner which intensifies the site with an envelope similar in size to adjacent development, is in close proximity to transit and is within a target area for intensification.

## 3.3 City of Ottawa Zoning By-Law (2008-250)



Figure 6: Zoning map of the Subject Site and surrounding context.

The subject site is zoned "Residential Fourth Density, Subzone UD" (R4UD) in the City of Ottawa's Comprehensive Zoning By-Law (2008-250) as shown on Figure 6. The purpose of this zone is to:

- / allow a wide mix of residential building forms ranging from detached to low rise apartment dwellings, in some cases limited to four units, and in no case more than four storeys;
- / allow a number of other residential uses to provide additional housing choices within the fourth density residential areas;
- / permit ancillary uses to the principal residential use to allow residents to work at home; and,
- regulate development in a manner that is compatible with existing land use patterns so that the mixed building form, residential character of a neighbourhood is maintained or enhanced.

The Mature Neighbourhoods Overlay also applies to the subject site. The Overlay includes zone provisions intended to ensure that new infill development complements and reinforces the established neighbourhood character as seen along each street. As per Section 140 of the By-law, the Mature Neighbourhoods Overlay generally regulates development or additions within the front or corner side yard through the completion of a Streetscape Character Analysis. Pursuant to Section 140 (4a), the proposed low-rise development is not subject to a Streetscape Character Analysis, as the proposal does not include a driveway or attached garage or carport, and includes a principal entrance facing the front lot line.

#### Permitted uses include:

- / apartment dwelling, low rise; / detached dwelling;
  - / diplomatic mission;

- / bed and breakfast (maximum of 3 guest bedrooms);
- / group home (maximum of 10 residents);
- / home-based business;
- / home-based daycare;
- / linked-detached dwelling;
- / park
- / planned unit development;
- / retirement home, converted;
- / retirement home;

- / duplex dwelling;
- / rooming house;
- / secondary dwelling unit;
- / semi-detached dwelling;
- / stacked dwelling;
- / three-unit dwelling;
- / townhouse dwelling; and,
  - urban agriculture.

Table 1 below evaluates the proposed development against the applicable zoning provisions, confirming that the subject site can adequately accommodate the development.

Table 1: Zoning Provisions

Provision	Required	Provided	Compliance
R4D			
Minimum Lot Width [Table 162A]	22 metres	15.24 metres	No
Minimum Lot Area [Table 162A]	660 metres	464.67 metres	No
Minimum Front Yard Setback [Table 162A]	6 metres	5.05 metres	No
Minimum Rear Yard Setback [S.144(3)(a)(ii)(iii)]	Lot depth greater than 25 metres but not more than 32 metres: 28% of lot depth  30.47.89 x 28% = 8.53 metres	7.85 metres	No
Minimum Interior Side Yard Setback [Table 162A]	1.5 metres	1.609 metres	Yes
Maximum Building Height [Table 162A]	11 metres	10.66 metres	Yes
Resident Parking Requirements (Area Z) [S.101]	No parking required	No parking provided	Yes
Visitor Parking Requirements (Area Z) [S.102]	No parking required	No parking provided	Yes
Bicycle Parking [Table 111A(b)(i)]	0.5 spaces/dwelling unit 8 units= 4 spaces	8 spaces provided	Yes
	I .	I .	

Provision	Required	Provided	Compliance
R4D			
<b>Bicycle Parking Space Dimensions</b> [S.111B]	Horizontal: 0.6 m by 1.8 m	0.6 metres by 1.8 metres	Yes

# The Four Tests of the Planning Act

Section 45 of the *Planning Act, R.S.O.* 1990 provides the Committee of Adjustment with the ability to grant minor variances by weighing their appropriateness on the basis of Four Tests. It is required to be demonstrated that a proposed variance satisfy the following tests:

- / Is it in keeping with the general intent and purpose of the Official Plan?
- / Is it in keeping with the general intent and purpose of the Zoning By-law?
- / Is it desirable for the appropriate development or use of the land, building or structure?
- / Is the application minor in nature?

It is our professional planning opinion that the application meets the "Four Tests" as follows:

## 3.4 Does the Proposal Maintain the General Intent and Purpose of the Official Plan?

The subject site is designated "Neighbourhood" on Schedule B3 (Inner Urban Transect) of the Official Plan. The Neighbourhood designation is intended to support housing in a compact, mixed-use environment. The minimum built height is 2 storeys and up to 4 storeys to permit higher-density low-rise residential development. The intent of this designation is to ensure new infill is functionally and aesthetically compatible and contributes to the towards the reduction of reliance on private vehicles while furthering the establishment of 15-minute neighbourhoods.

The proposal meets the form and context of the Neighbourhood designation, conforming to the intent of the Official Plan. Further, no vehicle parking has been provided, as the Official Plan supports the reduction of parking in close proximity to transit. The proposed variances support the compact and urban form of development proposed for the site. The subject site is in close proximity to transit and incorporates the inclusion of bicycle parking. The height of the building also maintains the intent of the Official Plan which is to have a low-rise built form (in this case 3 storeys). Limits on the height of the building are intended to ensure compatibility and transition with adjacent uses. The applicable Evolving Neighbourhood Overlay anticipates higher density forms of infill being introduced into this neighbourhood over time, such as that currently proposed. Further, the proposal includes 100% large-household dwellings, contributing to housing options within a community adjacent to rapid transit.

## 3.5 Does the Proposal Maintain the General Intent and Purpose of the Zoning By-law?

The subject site is zoned **Residential Fourth Density Zone**, **Subzone D (R4D)** in the City of Ottawa's Comprehensive Zoning By-Law. The purpose of the R4D zone is to allow a wide mix of residential building forms ranging from detached to low rise apartment dwellings.

As noted earlier in the report, the proposal requires relief from the required minimum lot width, minimum lot area, minimum front yard setback and minimum rear yard setback.

It is important to note that a low-rise apartment building could be developed as-of-right in the R4D zone on this site as it would meet the minimum lot width and lot area requirements. The required lot width and lot area for a stacked dwelling is much larger, despite both housing typologies being permitted a similar size, height and massing, and therefore their relationship to the surrounding context is very similar. However, whereas low-rise apartment dwellings contain communal interior areas, which eat into the overall floorplate efficiency, stacked dwellings have independent entrances for each unit. The development achieves larger units by eliminating these interior common areas, but the overall massing is generally permitted under the R4D zone. Therefore, the lot area and lot width reductions are consistent with the overall intent of the Zoning By-law.

The reduced front and rear yard setbacks respect the surrounding urban fabric. The front yard is consistent with the abutting semi-detached dwelling to the north, which was developed circa 2006-2007. Further, due to there being no sidewalks on Compton Avenue, the front yard appears much larger as the property line is set back approximately 6 metres from the curb, which on the subject site provides 11 metres of greenspace between the curb and the front wall of the building. With respect to the rear yard setback reduction, the rear wall of the building projects only 0.68 metres from the rear wall of the adjacent semi-detached building to the north, maintaining a 7.85 metre rear yard setback that includes 78.5m² of landscaped amenity area. The additional depth of the building allows for larger bedrooms located at the rear of the building, adding two feet to the bedroom depth. The reduced rear yard setback provides for larger bedrooms with minimal impacts on the size or usability of the rear yards, and a separation distance of 7.85 metres is ample for providing transition to the abutting property to the rear, protecting privacy and preventing overlook into adjacent yard on the upper floors.

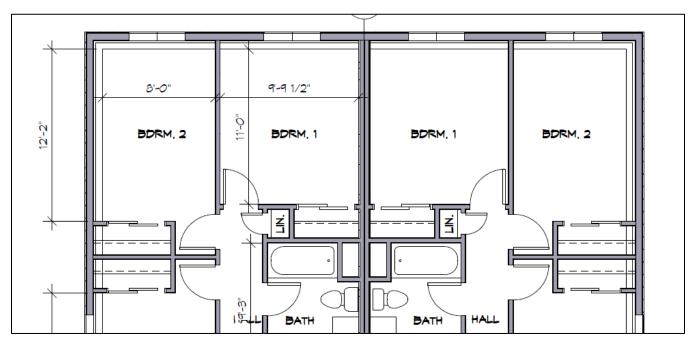


Figure 7: Basement units at the rear of the building benefit from the additional 0.68 metres of building depth.

The variances requested meet the general intent and purpose of the Zoning By-law, as the proposed building successfully provides an appropriate transition to adjacent landowners while offering an appropriate rear yard area to serve the needs of the tenants and adequate front yard to provide separation from the street.

## 3.6 Is the Proposal Desirable for the Appropriate Development or Use of the Land?

The proposed development consists of the establishment of a three (3)-storey low-rise stacked building containing eight (8) units. As noted previously, the project is consistent with the intended function of the R4D zone. Additionally, the proposal contributes to intensification goals of the R4D zone by providing an increased supply of housing. The policies of the Inner Urban Transect of the Official Plan promote intensification, encouraging low-rise apartment buildings and other low-rise residential dwellings where they can be accommodated and fit within the local context. Further, policies within the PPS support the proposed development by:

/ promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;

- / accommodating an appropriate affordable and market-based range and mix of residential types;
- / promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs; and
- ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs.

The proposed development makes efficient use of the land, proposes a land use that is compatible with the existing context of the surrounding community, makes use of underutilized land connected to services, and positively contributes to provincial and municipal intensification goals. The stacked dwelling building form produces a more efficient floorplate, resulting in larger units on a site planned for multi-unit development within an envelope that fits well within the surrounding context.

## 3.7 Is the Proposal Minor in Nature?

The establishment of the proposed development on the basis of the proposed minor variances is not anticipated to generate any undue or adverse impacts on adjacent properties. The proposed development is generally consistent with the provisions under the R4D zone and capable of accommodating new development that is consistent with the existing mix of dwelling types in the area.

The variances being sought are minor in nature and deviate only marginally from the minimum requirement under the Bylaw. The reduction of the lot width and area by the proposed variances does not affect the overall character of the neighbourhood, as the proposed multi-unit development is similar in shape, massing and impact to permitted low-rise multi-unit development, but includes a more efficient floorplate that results in larger units with no perceptible increases to the exterior of the building.

The same can be stated for the reduced front yard setback and rear yard setback, as the front and rear of the building remain approximately in-line with neighbouring properties without significant reductions in greenspace or any undue overlook into neighbouring properties. Lastly, these variances are not anticipated to produce adverse impacts on the public realm of Compton Avenue, nor to adjacent properties. The proposed variances are therefore considered minor in nature.

## 4.0

## Conclusion

It is our professional opinion that the Minor Variances described herein meet the Four Tests of the Planning Act and result in a development proposal which represents good planning principles and is in the public interest. The variances allow for the establishment of a compatible, low-rise apartment form that contributes positively to the housing supply, the public realm, transit, and active transportation objectives. This report recognizes the following:

- / The proposal is consistent with the direction of the Provincial Planning Statement (2024);
- / The proposal conforms to the policies and objectives of the Official Plan;
- / The proposal meets the intent of the City of Ottawa Comprehensive Zoning By-law; and
- / The proposed minor variances meet the four tests, as set out in the Planning Act.

Please contact the undersigned at <u>ouseley@fotenn.com</u> and <u>bolduc@fotenn.com</u> with any questions or requests for additional material.

Sincerely,

Mark Ouseley, MES Planner Jacob Bolduc, RPP MCIP Associate

Bell