

Summary of Written and Oral Submissions

Official Plan Amendment – Corso Italia Station District Secondary Plan; Zoning By-law Amendments - Minimum Parking Requirements for Corso Italia Station District; and 818 Gladstone Avenue and 933 Gladstone Avenue

In addition to those outlined in the Consultation Details section of the report, the following outlines the written and oral submissions received between the publication of the report and prior to City Council's consideration:

Number of delegations/submissions

Number of delegations at Committee: 3

Number of written submissions received by Planning Committee between February 12 (the date the report was published to the City's website with the agenda for this meeting) and February 25, 2021 (committee meeting date): 5

Primary concerns, by individual

Dr. Martin de Zuviria (oral and written submission)

- opposed to the rezoning of the land on area D, which is located across the street from his home at the intersection of Raymond and Booth
- the plan to rezone area D involves changing the current maximum height of any construction from 11m just to allow the construction of a 26-floor building, together with other low-rise buildings
- bought his property in 2006, mainly because the area is residential, and this plan will have an important and negative impact on his way of living
- would like to know the impact of this proposed rezoning on his taxes within the next ten years
- would like to know if studies have been conducted in respect of the potential traffic increase on Booth Street derived from dramatically increasing the population density in this area
- a fortune has been spent on demolition or construction of this area D and surrounding sectors, and on the remediation of the soil and levelling of the area, all done rapidly, meaning there is already some kind of understanding in place, even if not written, between the City and the investors; the alternative view is that companies investing

funds on this type of project spend fortunes without expecting anything in return from the City

- the committee should do the right thing and take his opposition, in spite of any understanding the City might have in place with the investors, and reject the rezoning of Area D
- most City employees and interested parties attending this and similar meetings are paid to attend while residents like him may lose precious hours of paid work that may not be recovered
- decaled his right to sue the City of Ottawa in respect of this re-zoning and his right to communicate his views to the local, national and international media and to inform them of every aspect of this process that he considers relevant

Canadian Bank Note Company Limited (CBN), as represented by Christine McCuaig, Principal Senior Planner & Project Manager, Q9 Planning + Design; Greg Meeds, Partner, Vice and Hunter LLP; Gordon McKechnie, Senior Vice-president, CBN. The following persons were also present for CBN to respond to questions: Michael Besley, Assistant General Counsel, CBN; Gregory Clunis, President, and Pier-Gui Lalonde, Engineer, Integral DX Engineering (oral submission, slides on file)

- they object to the proposed changes in relation to 933 Gladstone
- the facility is currently compliant with Ministry noise regulations
- the proposal does not comply with Provincial Policy Statement (PPS) requirements
 - Section 1.2.6.1: says sensitive land uses shall be planned and developed to avoid or minimize and mitigate any potential adverse effects from noise to ensure the long-term operational and economic viability of major facilities; CBN is a major facility for employment
 - Section 1.2.6.2: says where avoidance is not possible in accordance with policy 1.2.6.1, planning authorities shall protect the long-term viability of existing manufacturing uses that are vulnerable to encroachment by ensuring that the planning and development of proposed sensitive land uses are only permitted if the following criteria are demonstrated: a) there is an identified need for the proposed use; b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations; c) adverse effects to the proposed sensitive land use are minimized and mitigated; d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated; only criteria a) has been met; most notably mitigation to CBN has not been met; Section 1.3 of the PPS says the City shall promote economic development and competitiveness by taking into account the needs of existing and future

businesses; this is so their continued operation is not jeopardized by the encroachment of noise sensitive uses

- in discussing land use compatibility, especially on the matter of noise, it's important to review what the Ministry compliance means; in this case CBN must assess and maintain compliance on an ongoing basis, which means when 'likely future uses' of reception points have changed; for example when the Public Works building was demolished CBN had to change their assessment because the likely future use had changed
 - noise compliance is based on "Points of Reception" for noise-sensitive land uses and these receptors apply in consideration of zoning, heights, context, and "likely future use"; the guiding Noise document is specific to say that these considerations are required to be assessed even if there is no approval in place for a proposal
 - in terms of likely future use", the proposed amendments will change that use to some parcels from General Urban Area (predominantly low-rise) to Mixed-Use Centre (which readily supports high-rise buildings), which means higher receptor points; for 933 Gladstone, it is altering the existing zoning where there is a maximum FSI of 1.5, which informs lower density and generally lower building heights, to a zone with a very specific building height schedule, so the number of stories depicted are to be expected regardless of the zoning
 - approval of the Secondary Plan and those Amendments change the proposed heights and the "likely future use."; it creates new, higher points of reception that are more difficult to mitigate; if this zoning change is approved, CBN would have to ensure any noise generated from its facility doesn't exceed a noise power reading of more than 45 decibels at a point of reception, but there are 30-storey towers contemplated and those points of reception are very hard to protect from the roof noises generated from their facility
 - compliance is required as soon as those likely future uses have changed, meaning the proposed compliance is imminent, not when a Site Plan Control has been submitted; in other cases this cost of compliance has been in excess of \$4,000,000 dollars; the cost of compliance should be the responsibility of the parties wishing to change the zoning
 - there's a lack of understanding at the City of the interplay between the rules established by the Ministry of the Environment for the operations of their facilities and the City development process
- In terms of what needs to happen and what has already been requested earlier in the CDP process:

- a noise study or assessment, at the minimum, to determine what mitigation measures are required and even if compliance can be obtained
- a means of ensuring mitigation does not fall on CBN – this needs to happen before front of land use changes to ensure PPS compliance, not at the back end; cost mitigation has two components – immediate and long term for the continued operation of the facility
- request that Planning Committee consider the implications to CBN and defer or hold the zoning at this time to allow for the proper process to follow to ensure PPS compliance; should the zoning proceed at a later date, the responsibility of the proponent, being the City, to enter into a new agreement for costs with CBN
- CBN fully supports the development of affordable housing and would prefer not to delay their construction but they must protect their interests, as the cost implications are significant
- CBN wants to cooperate with the City but does not want to pay for this development; they recommend Committee defer the matter whoe an agreement is reached

Paul Black, FoTenn, on behalf of TIP Gladstone LP (owners of 951 Gladstone Avenue and 145 Loretta Avenue North), **c/o CLV Group Developments** (written submission)

- Fotenn reviewed the document as it relates to the above properties and appreciates the consistency of the Secondary Plan with the proposed development for these lands, but has a concern with the required road widening for Gladstone Avenue, adjacent to the subject property, as detailed in Document 2 of the staff report
 - the proposed amendment seeks to require a 22 metre wide right-of-way (ROW) along Gladstone Avenue between Loretta and 106 metres west of Preston Street
 - currently, there is no widening requirement for this section of Gladstone Avenue in the Official Plan; the current ROW is approximately 20 metres which, in their opinion, is sufficient for the City to achieve the objectives of the Secondary Plan with regards to providing adequate space for pedestrians, cyclists, and street trees along the street
 - they ask that the widening requirement along Gladstone Avenue adjacent to the properties at 951 Gladstone and 145 Loretta Avenue be revised to reflect a 20 metre right-of-way

Primary reasons for support, by individual

Ottawa Community Housing Corporation (OCH), as represented by Cliff Youdale, Chief Development Officer, OCH; Robert MacNeil, Senior Manager, Realty Initiatives, OCH; Miguel Tremblay, Partner, Fotenn (oral submission)

- thanked Councillors and staff involved in this thorough process and appreciated the level of engagement
- this is a hugely important parcel of land from a city-building perspective, both at the Somerset and Gladstone sites; they have already identified funding through Canada Mortgage and Housing Corporation (CMHC) to engage on both sites and are eager to proceed because it is time-constrained funding
- OCH was not aware in any meaningful way of the discomfort of the CBN, as it was staff's burden to deal with them because this was a City-initiated Zoning By-law Amendment
- in terms of the criteria in Section 1.2.6.2. of the PPS:
 - with respect to assessing the appropriateness of the land use and alternate locations, the City is looking at this in the context of a comprehensive review in support of the Secondary Plan and staff considered whether these properties were well suited, working with OCH, who purchased these properties with the aim of providing affordable housing in proximity to transit; in this regard, criteria b in that policy is addressed
 - with respect to criteria c and d, at the time of site plan there will be detailed noise studies that assess what the obligations are for OCH in terms of their construction and all of those elements will be factored in, being mindful of noise sources in proximity to the site
 - this Secondary Plan is implementing policies that are already well within the Official Plan; OCH lands and the majority of the lands within the Secondary Plan area are already designated Mixed-Use Centre in the current version of the OP, and those policies already support 30-storey buildings in proximity to the transit station; all the other heights shown in OCH lands, that are now part of this Secondary Plan and implemented through the Zoning, are actually anchored in existing policies

Dave Roberston, Bike Ottawa (written submission)

- Bike Ottawa has been involved with the development of the Corso Italia Station District Secondary Plan as part of the Public Advisory Group and is very excited about this plan, as it prioritizes the safe movement of people using active

transportation, whether that be walking, rolling, or cycling, and it aligns very well with the language used in the draft Official Plan, as well as the goal of making Ottawa the most liveable mid-sized city in North America

- in particular, they are encouraged to see:
 - planning and designing “with a premise of sustainable transportation having absolute precedence on how streets, paths and other linkages are designed.”
 - year-round low-stress cycling facilities moving north-south and east-west on all streets
 - superblocks - allowing for the safe permeability for people to move around safely and comfortably
 - reducing car speeds to a maximum of 30kph through street design, or using the “woonerf” design principle
 - active frontages on the Trillium multi-use pathway, as well as good lighting, will add a level of safety and thus make it a more gender-equal active transportation route
 - elimination of front yard parking, reducing interactions between motorists and vulnerable road users
 - “ubiquitous and plentiful bike parking”, including a minimum of 1.0 bike parking space per multi-residential unit
 - a new active transportation route using the existing City Centre underpass
 - the Laurel Active Transportation Bridge, linking this new community with Hintonburg to the west
 - active transportation routes will provide opportunities for school students to walk or cycle year-round
 - segregation of pedestrians and cyclists on the Trillium multi-use pathway to provide safe, efficient and comfortable movement for all ages and abilities; they encourage cycling facilities to meet current Transportation Association of Canada guidelines of 2.1m per direction
 - implementation of the crossing at Gladstone and Trillium multi-use pathway to prioritize and provide a high level of service; they hope that this design will incorporate elements to protect active transportation users coming from all directions through intelligent design
- as there is no current safe east-west cycling route between Scott/Albert and the 417, they hope to see the mentioned “bike lane” for Gladstone upgraded to “segregated

cycling facilities” from Preston to Street B to allow the safe year-round movement of residents by bike or wheeled-device, no matter their age or ability; segregated cycling facilities should continue westward from Street B

John Moser, on behalf of Preston Hardware (who own property within the area between Gladstone Street and Larch Street, and Preston Street and the OHC property) (written submission)

- Preston Hardware participated through all stages of the evolution of the plan and thanks staff for the opportunity to do so
- they support the staff report and recommend approval

Effect of Submissions on Planning Committee Decision: Debate: The Committee spent 1 hour and 47 minutes in consideration of the item.

Vote: The committee considered all submissions in making its decision and carried the report recommendations with the following amendments:

- ❖ **THEREFORE BE IT RESOLVED that staff be directed to include the following text to describe the desired future streetscape typology for the portion of Rochester Street within the Corso Italia Station District Secondary Plan boundaries:**

‘Rochester Street will be designed as a complete street with wide sidewalks, bicycle facilities, on-street parking, and street trees, taking into account the context of the corridor and the available right-of-way.’

- ❖ **THEREFORE BE IT RESOLVED that the text in the “Asset Management Implications” section be replaced to read as follows:**

“There is major water and sewer infrastructure that encumbers the largely vacant lands controlled by the City and lands expected to be conveyed to the City from the federal government in 2021 (area east of railway cut, north of Gladstone, and west of existing development from Plant Bath south to Balsam). A coordinated plan will be required to relocate this infrastructure and/or to ensure that development avoids the alignment of this infrastructure. A financial plan will also be required to support the funding of infrastructure relocation. This plan may also need to address advancement of renewal of some infrastructure in this area.

While plans specific to infrastructure relocation and servicing for this area are not within the scope of the Infrastructure Master Plan to be updated in 2022, the strategies for servicing increased levels of

intensification, as would be permitted by the proposed Official Plan and Zoning By-law amendments, will be addressed as part of this update. While capacity exists to accommodate further intensification in existing urban development areas of the City, there are limits to available capacity and a focused program will be required to manage the impacts of intensification on existing infrastructure. In particular, increased on-site stormwater management requirements may need to be imposed in order to manage these impacts, which could have implications on the design of residential intensification projects.”

AND BE IT FURTHER RESOLVED that no further notice be given pursuant to subsection 34 (17) of the *Planning Act*.

- ❖ **THEREFORE BE IT RESOLVED** that Planning Committee replace Document 7 with the revised Document 7, attached as Appendix 1¹ to this motion, showing the modifications in red; and

BE IT FURTHER RESOLVED THAT pursuant to the *Planning Act*, subsection 34(17) no further notice be given.

Ottawa City Council

Number of additional written submissions received by Council between February 25 (Planning Committee consideration date) and March 10, 2021 (Council consideration date): 1

Primary concerns, by individual

Greg Meeds, Partner, Vice and Hunter LLP, on behalf of Canadian Bank Note Company Limited (CBN)

- provided clarification on certain matters spoken to by Legal and staff during the February 25th Planning Committee consideration of this matter; CBN fully supports the development of affordable housing units by Ottawa Community Housing; its sole concern relates to the potentially multi-million dollar cost associated with ensuring compliance with Ministry of the Environment, Conservation and Parks requirements for noise emissions
- while there appears to be a recognition by staff and members of the Planning Committee that any and all costs associated with mitigation measures to ensure CBN compliance are to be those exclusively of the developer (in this case, OCH), the potential mitigation measures open to OCH and the mechanics by which OCH’s obligations to CBN are guaranteed were, in their submission,

¹ See attached Appendix 1 at end of Summary

incorrectly conveyed to members of the Committee

- contrary to the advice provided by Legal during the meeting, it is not open to OCH to mitigate sound levels from a stationary source like CBN by designing its structure with thicker or sealed windows, or any other on-site mitigation; noise levels are to be predicted at a point of reception identified as the "plane of a window" (at the outside); so that if the window is opened, indoor noise levels will meet MECP indoor criteria; as a result, MECP requires that any necessary mitigation be achieved on the CBN site itself, as the pre-existing stationary source
- Section 1.2.6.2 of the Provincial Policy Statement requires that the City "shall protect the long- term viability" of CBN by "ensuring" that the "planning" and the "development" of the OCH site is only permitted if "adverse effects to the proposed sensitive land use are minimized and mitigated" and "potential impacts to industrial, manufacturing and other uses are minimized and mitigated"; at this time, none of these requirements have been satisfied; neither the City nor OCH has completed any noise study which would be required as a pre-requisite to determining what mitigation will be required, how it is to be achieved, and contractually obligating OCH to CBN for such mitigation costs; by rezoning the lands for the OCH development in the absence of the demonstration of these pre-requisites, any decision to rezone will not be consistent with the PPS
- of further concern is staff's assertion that all of this can wait until the Site Plan Control approval process; this is not at all what the PPS requires, and not what NPC-300 or the City's own guidelines require; the noise study, the determination of necessary mitigation, and the formalization of an agreement between OCH and CBN which fully indemnifies CBN from any expense relating to mitigation, are all to happen at the earliest stages of the planning approval process; Site Plan is at the end stage of the development
- the City's position at Planning Committee that a Noise Study or Noise Assessment at this stage is not required because a building is not being proposed is inappropriate and unacceptable for two reasons:
 - the first being that it is very public knowledge that the site is being developed as affordable housing by OCH and that some degree of building form has been discussed which resulted in the very distinct height schedule proposed and approved at Planning Committee

- the second is that the City’s noise guidelines (S.3.0) specify, “the study is required so early in the process ... because the outcome of the study is intended to contribute directly to site design and consequent decisions of committee, council and staff on the planning application.”; by site design, this policy is intended to indicate that the outcome of such a study may impact setbacks and built form
 - notwithstanding that CBN has been raising this specific concern with City staff for years, it is proposed to kick-the-can down the road to the Site Plan stage, which is contrary to the PPS and applicable guidelines, and is simply unreasonable and unacceptable to CBN; CBN will have no direct input into the Site Plan process, and has no right of appeal should the City fail to adequately address CBN’s recognized concerns
 - further, the City’s authority to impose conditions as part of a Site Plan Control Agreement is statutorily limited to those items set out in Section 41(7) of the *Planning Act*, by even the most generous interpretation of the items set out therein, there is nothing which gives the City the authority to require the necessary agreements between OCH and CBN
- this episode is the most recent unfortunate example of the City not acknowledging what is required for such development to be considered; CBN’s experience at its location on Richmond Road, and the 8-year continuing saga at LPAT, is testament to that; CBN wants nothing more than to see OCH develop the much-needed affordable housing units at 933 Gladstone but it cannot afford to risk the financial consequences of the City failing to properly address the clear PPS and noise guideline requirements; while the proposed language in the Secondary Plan is helpful and appreciated, it offers little comfort if CBN has no way to ensure that the City requires what it must prior to development
- while the City and OCH are understandably eager to begin construction at 933 Gladstone, the proposed by-law as it relates to that location is pre-mature at this time, and in accordance with the clear language of the PPS, the development cannot be “planned” until a noise study is completed, mitigation measures are determined, and an agreement is executed between CBN and OCH; CBN is in the final stages of concluding just such an agreement with the developer of the lands on the east side of Loretta Street and the developer of the lands at 175 Richmond Road; a modest delay in the rezoning process for 933 Gladstone to conclude a similar agreement with OPH would save a costly appeal and the lengthy delays it would entail

Effect of Submissions on Council Decision:

Council considered all submissions in making its decision and carried the report recommendations and amendments approved by Planning Committee, as well as the following amendment:

WHEREAS Report ACS2021-PIE-EDP-0010 recommends the approval of an Official Plan Amendment to establish a Secondary Plan and zoning amendments to implement measures for achieving public realm improvements, and provision of the area as a Protected Major Transit Station Area; and

WHEREAS, during the February 25 Planning Committee Meeting, staff had verbally supported a request by the Ward Councillor to add reference to the existing Heritage Designation of the Standard Bread Company Factory and Plant Bath in the Secondary Plan (Document 3);

THEREFORE BE IT RESOLVED that Council approve inserting the following policies to Document 3, showing the modifications in red and re-numbering the policies that follow accordingly;

4.1.1.15

Future redevelopment around the Standard Bread Company Factory building shall incorporate design elements including, but not limited to building setbacks, stepbacks, massing, and public spaces that showcase the cultural heritage of that building and site, as designated under Part IV of the *Ontario Heritage Act*.

4.1.4.2

The property is designated under Part IV of the *Ontario Heritage Act*. Any redevelopment of this site shall conserve the heritage value and attributes of the designated building and/or site.

APPENDIX 1: Revised ACS2021-PIE-EDP-0010 - Document 7

Document 7 – Details of Recommended Zoning: Site-Specific, 818 Gladstone Avenue, and 933 Gladstone Avenue and part of 1030 Somerset Street

The proposed change to the City of Ottawa Zoning By-law No. 2008-250 for 818 Gladstone Avenue:

1. Rezone the lands as shown in the Zoning Key Plan for 818 Gladstone Avenue (Document 8).
2. Amend Section 239 – Urban Exceptions by adding a new exception XXX1, with provisions similar in effect to the following:
 - a) In Column II, add the text, multiple
 - b) In Column III, add the following text: artist studio, bank, bank machine, bar, community centre, community health and resource centre, convenience store, day care, hotel, instructional facility, laundromat, library, medical facility, municipal service centre, office, personal service business, pharmacy, post office, recreational and athletic facility, retirement home, restaurant, retail store, retirement home, public parking garage
 - c) In Column V, add the text:
 - Any part of the building exceeding 20m in height must be stepped back a minimum of 2m from the ground floor building face, except on Area D on SXX1
 - In Area C on Schedule SXX1, an additional minimum building stepback of 5.0m is required for any portion of the building above 14.5m or 4 storeys, on the Booth Street frontage.
 - In Area D on Schedule SXX1, an additional building stepback a minimum of 3.0m is required for any portion of the building above the lesser of 30.0m or 9 storeys
 - Minimum required setback from Gladstone Avenue, Rochester Street, Booth Street and Raymond Street: 0m
 - Where a building wall of the ground floor is located adjacent to a public right of way, the maximum setback from the property line is 3m to the closest portion of the building wall of the ground floor. The storeys above the ground floor must have the same setback as the

ground floor, subject to additional setback requirements.

- A minimum of 50% of the ground floor façade facing a public street, measured from the average grade to a height of 4.5 metres, must comprise transparent windows.
- A parking garage entrance must be setback at least an additional 0.3m from the façade on which it is located.
- Non-residential uses in an R4T or R5BB zone are permitted within a residential use building and where a non-residential use is included within a residential use building, the type of dwelling applicable to the building is determined based on the number of and configuration of the dwelling units
- In the R4T zone, the additional permitted uses, are limited to a maximum GFA of 200m² each
- In the R5BB zone, the additional permitted uses, other than offices, are limited to a maximum GFA of 200m² each
- No principal or accessory parking lot is permitted and no surface parking spaces are permitted except for:
 - i. parallel parking spaces on: 1) a private way in a Planned Unit Development, or 2) for a mid-rise or high-rise building
 - ii. in the case of parking accessory to ground-oriented residential buildings in Area A, B and C on Schedule SXX1, parking spaces are permitted only where they are concealed from any public or private street by buildings
- Minimum bicycle parking space requirement is 1 space per dwelling unit
- The following applies to buildings fronting Gladstone Avenue:
 - i. Except in the case of a residential entrance, the entire width of the ground floor level facing Gladstone Avenue must be occupied by one or more of the uses listed in Column III, except retirement home
 - ii. The following uses are prohibited in any part of the ground floor facing Gladstone Avenue of any building with frontage along Gladstone Avenue:
 - diplomatic mission

hotel

office

park

parking garage

research and development centre

residential care facility

training centre

urban agriculture

- iii. Each use in Column III must provide at least one active entrance on a façade facing a public street.
- iv. Any part of a building adjacent to Gladstone Avenue exceeding six storeys or 20m must be stepped back a minimum of 3.5m.
- v. No entrance to a garage is permitted adjacent to Gladstone Avenue

3. Amend Part 17 – Schedules by adding a new schedule SXX1 as shown in Document 9

The proposed change to the City of Ottawa Zoning By-law No. 2008-250 for 933 Gladstone Avenue and part of 1030 Somerset Street:

1. Rezone the lands as shown in the Zoning Key Plan for 933 Gladstone Avenue and part of 1030 Somerset Street (Document 8).

2. Amend Section 239 - Urban Exceptions by adding the following exception [XXX2] with provisions similar in effect to the following:

a) Under Column II, add the text: multiple

b) Under Column V, add the text:

- Any part of the building exceeding the lesser of six storeys or 20m in height must be stepped back a minimum of 2m from the ground floor building face.
- Garage doors and individual driveways associated with a low-rise residential use are not permitted to face or abut a public street.
- Any provided parking associated with a low-rise residential use must be accessed from a private lane.
- Minimum additional setback for a garage entrance to an apartment dwelling: 0.3m
- No principal or accessory parking lot is permitted and no surface parking spaces are permitted except for parallel parking spaces on: 1) a private way in a Planned Unit Development or 2) for a mid-rise or high-rise building
- Minimum bicycle parking space requirement is 1 space per dwelling unit.
- Any building along Frontages 1, 2, or 3 in Area E on Schedule SXX2 must provide a minimum of one active entrance, with an additional active entrance for at least every 20 metres of building width for retail and commercial uses, and every 8 metres of building width for residential uses facing such frontage.
- For Frontages 1, 2 or 3 in Area E of Schedule SXX2:
 - i. Any non-residential use on the ground-floor is permitted a maximum individual frontage of 20m
 - ii. Any residential use on the ground-floor is permitted a maximum individual frontage of 8m

- A minimum of 50% of the ground floor façade facing Frontages 1, 2, or 3 in Area E, measured from the average grade to a height of 4.5 metres.

must comprise transparent windows.

- Except in the case of residential entrances, where any building facade faces Frontages 1, 2, or 3, on Schedule SXX2, the ground floor must be occupied by one or more of the permitted non-residential uses, other than:

diplomatic mission

park

parking garage

research and development centre

residential care facility

training centre

urban agriculture

- Despite any other provision of this by-law, in Area E on Schedule XX2 after the first 9 storeys, any part of the building facing Frontage 1, 2 or 3 of Schedule XX2 is subject to an additional minimum setback of 5m.
- Minimum area for a plaza comprising a mix of hard and soft landscaped area abutting both Frontage 1 and 2, in Area E of Schedule XX2: 650m²
- in Area E on Schedule XX2, the minimum area of hard and soft landscaping of 650m² must comprise one aggregated area of at least 375m², whose longer dimension is generally not more than twice its shorter dimension.

3. Amend Part 17 – Schedules by adding a new schedule SXX2 as shown in Document 9