Planning Justification Report

Zoning By-law Amendment & Consent

189 William Street, Niagara-on-the-Lake

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1.0 Introduction

NPG Planning Solutions Inc. are planning consultants to Rebecca DeBoer, “Owner” of approximately 1,285 square metres of land in the Town of Niagara-on-the-Lake, municipally known as 189 William Street (Subject Lands). The Subject Lands are legally described as Part of Lot 229, Plan 86 in the Town of Niagara-on-the-Lake. NPG has been retained to provide professional planning advice on the proposed severance of the Subject Lands. Implementation of the proposed development requires a Zoning By-law Amendment and Consent application. The Zoning By-law Amendment is required to alter the lot frontage to facilitate the severance under the Town of Niagara-on-the-Lake Zoning By-law No. 4316-09.

This Planning Justification Brief (PJB) provides an analysis of the proposed development and evaluates the appropriateness of applications for Consent and amendment to the Zoning By-Law when assessed against policies in the Provincial Planning Statement (PPS), Niagara Official Plan (NOP), the Town of Niagara-on-the-Lake Official Plan (Town OP) and the Town of Niagara-on-the-Lake Zoning By-law No. 4316-09.

The proposed development is an example of gentle intensification within the urban boundary. In particular, the development increases the availability of housing within the Old Town community and adds variability to the unique parcel fabric present in the area.

Sections 5.1, 5.2, and 5.3 of this brief present analysis of the proposed applications within the provincial and regional planning policies. Section 5.4 of this brief discusses the proposal’s conformity with the Town OP while Section 6.0 provides justification for approval of the application for the Zoning By-Law Amendment.

2.0 Description of Subject Lands and Surrounding Area

The Subject Lands (shown in **Figure 1**) are located in the Urban Boundary of the Town of Niagara-on-the-Lake, more specifically in the Old Town Community Zoning District. The Subject Lands are approximately 1,285 sqm (0.128 hectares) in area, with a depth of approximately 39.6 m, and a frontage of approximately 32.4 m along William Street. There is an existing one-storey single detached dwelling, and two sheds located on the site. The existing dwelling and one shed are proposed to be demolished to accommodate the proposed development. The other shed is proposed to be relocated to accommodate the proposed development. A vegetative hedge is also existing within the right-of-way of William Street. This feature is to be repositioned so that it lies entirely within the existing property boundary. If relocation is not feasible, it will be removed. The rear portion of the Subject Lands consists of amenity area for the existing dwelling inclusive of hedges and trees.

The Subject Lands are designated ‘Established Residential’ in the Town OP, shown in **Appendix A**. Zoning By-law 4316-09 zones the lands ‘Established Residential (ER)’, as shown in **Appendix B.**

The surrounding area predominately features single detached dwellings, 1-2 storeys in height. The surrounding properties feature generally feature a rectangular shape

however vary in size. The frontage of these lots ranges from approximately 15 metres to 30 metres.

The Subject Lands are in proximity to the Mississauga Street and Mary Street intersection, which provides a range of commercial uses including retail shops and restaurants. According to Schedule G of the Town Official Plan, Mary Street is identified as an Arterial Road. Mississauga Street is classified as an arterial road south of Mary Street, transitioning to a collector road north of Mary Street. These roads also provide connectivity to the greater region as well as direct access to the retail area within Old Town.

Figure 1. Aerial Context Map

For Site Photos and additional context please see Appendix D.

3.0 Proposed Development

The Owner is submitting an application for Consent to sever the Subject Lands into two (2) parcels, featuring one severed lot (Part 1) and one retained lot (Part 2), that are largely similar in size and shape. The proposed development would facilitate the future development of one single detached dwelling on each lot. The proposed lots will feature the following configuration:

	Existing	Part 1 (Severed)	Part 2 (Retained)
Lot Area	1,285 sqm	642.5 sqm	642.5 sqm
Lot Frontage	32.46 m	16.23 m	16.23 m
Lot Depth	39.62 m	39.62 m	39.62 m

The existing dwelling will be demolished to accommodate the new dwellings. The proposed development will result in a net gain of one dwelling unit. The new dwellings will be accessed from William Street. The proposed lot lines and building envelopes per zoning requirements are shown in **Figure 2**. The hedge currently located within the road allowance will be removed from the Town's right-of-way.

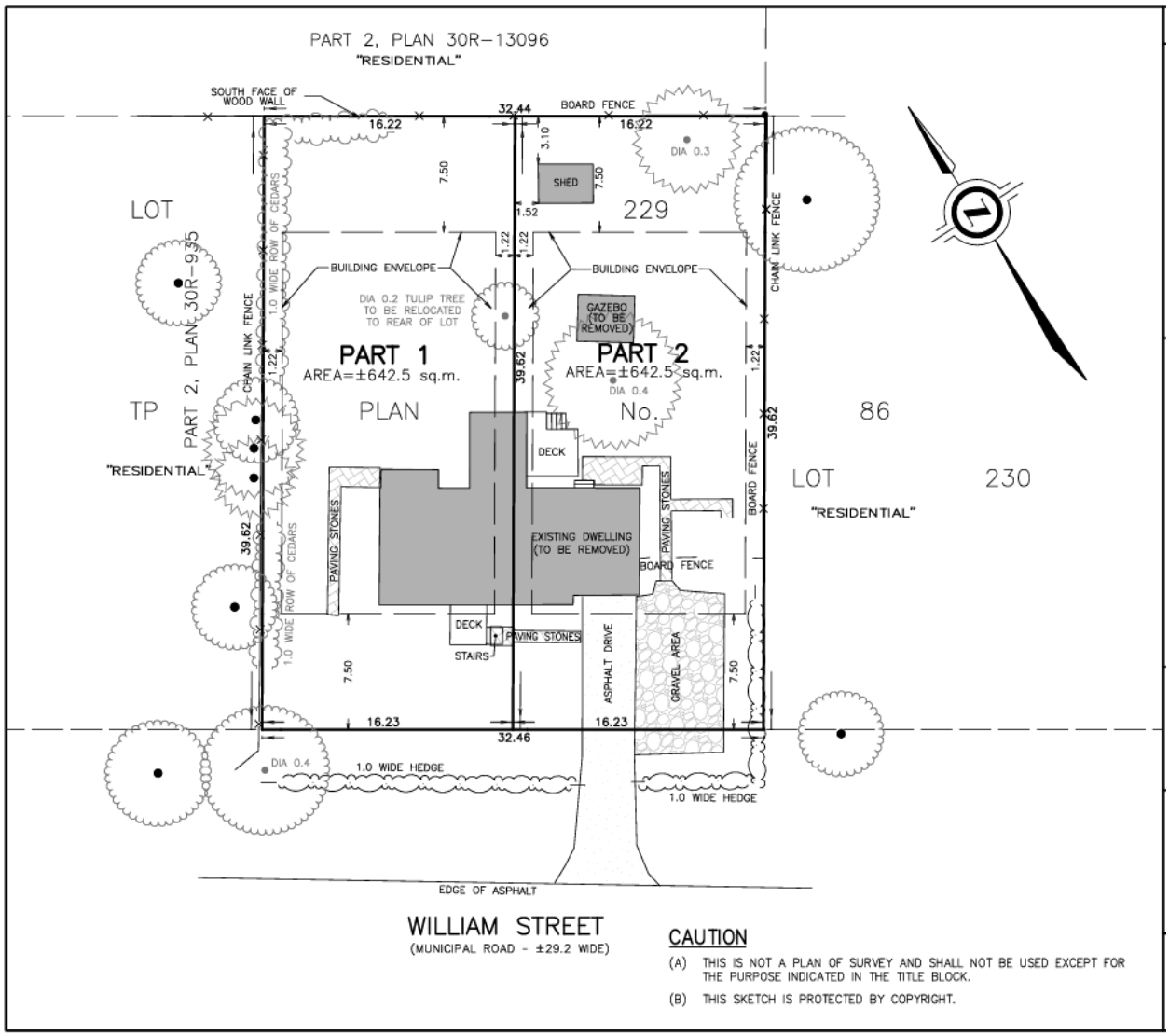


Figure 2. Consent Sketch

To facilitate the Consent, a Zoning By-law Application will be submitted concurrently with the Consent. The ZBA application will address the zoning deficiency in relation to lot frontage.

The future dwellings are anticipated to be 1 storey in height and feature a proposed lot coverage of 45% with all other setbacks achieved. For further information and justification regarding the proposed lot coverage increase please see Section 6.1 of this brief.

3.1 Pre-Consultation Summary

A Pre-consultation meeting for the proposed development was held with Town Staff on February 19, 2026. Staff highlighted compatibility with respect to urban design and the existing character of the area as specific matter to be addressed within the planning analysis.

The Pre-consultation notes outlined the following plans and information be submitted with the ZBA application:

- Planning Justification Report
- Draft Zoning By-law Amendment (see Appendix C)
- Streetscape Study/Urban Design Review (contained within Appendix D of this report)
- Archaeology Assessment
- Arborist Report/Tree Inventory Preservation Plan
- Consent Sketch
- Site Plan

4.0 Supporting Studies Review

4.1 Archeological Assessment

A Stage 1-2 Archaeological Assessment of the Subject Lands was conducted by Archaeological Consultants Canada to investigate the archaeological potential of the Subject Lands. No artifacts or other archaeological resources were identified during the Stage 1 & 2 Archaeological Assessment of the Subject Lands and no further archaeological assessments are required.

4.2 Tree Inventory and Preservation Plan

A Tree Inventory and Preservation Plan was prepared by Jackson Arboriculture Inc. The study found a total of 13 trees 12.5 cm in diameter or larger reside on the Subject Lands or within 6 metres of the property lines. No rare, threatened or endangered tree species were documented in the tree inventory.

It was also noted that that the tree identified as Tree 9 which was located in the centre of the property was removed to accommodate the proposed development. Tree 8 also conflicted with the proposed development and was relocated to the rear of the Subject Lands to protect it. A total of four new trees had also been planted along the rear lot line to compensate for the removal of Tree 9.

Trees 4–6, located on the adjacent property at 390 Simcoe Street, are proposed to be removed to accommodate future development on the severed lot. The Owner of the Subject Lands has consulted with the Owner of 390 Simcoe Street regarding the removal of these trees. The neighbouring owner has confirmed they have no objection to tree removal on their lands to accommodate the proposed development and has provided a letter of support. This letter is included as part of this submission.

4.3 Streetscape Study

A Streetscape Study prepared by NPG is provided in the Appendix D of this brief. The purpose of the Streetscape Study is to ensure that the proposed development aligns with the Town's urban design and compatibility policies as well as the character of the existing neighbourhood. The Streetscape Study concludes that the proposed development is consistent with the character of the neighbourhood.

5.0 Planning Policies

5.1 *Planning Act*

The *Planning Act*, R.S.O. 1990, Chapter P.13, provides provincial legislation that establishes the requirements for land use planning in Ontario. The Act describes how land uses may be controlled, and who may control them."

Section 2 of the *Planning Act* ("the Act") outlines the matters of provincial interest that the council of a municipality, a planning board and the Ontario Land Tribunal shall have regard to in carrying out their responsibilities under the Act. The following table provides a summary of the provincial interests, along with an analysis as it relates to the proposed development and the subject Applications.

Table 5.1.1: Analysis of Provincial Interest – Section 2 of Ontario *Planning Act*

SECTION	PROVINCIAL INTEREST	ANALYSIS
a)	***the protection of ecological systems, including natural areas, features and functions***	The Subject Lands do not have any ecological systems present.
b)	***the protection of the agricultural resources of the Province***	The proposed development does not destroy or hinder any agricultural lands.
c)	***the conservation and management of natural resources and the mineral resource base***	This is not applicable.
d)	***the conservation of features of significant architectural, cultural, historical,***	The Subject Lands do not feature any cultural heritage resources. In accordance with the Stage 1-2 Archaeological Assessment which was conducted, the Subject Lands do not feature any archaeological potential.

SECTION	PROVINCIAL INTEREST	ANALYSIS
	archaeological or scientific interest	
e)	***the supply, efficient use and conservation of energy and water***	The proposed development provides compact built-form and gentle intensification in an area with existing municipal services allowing for the efficient use of energy and water.
f)	***the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems***	The proposed development will utilize existing municipal services and be accessed from William Street.
g)	***the minimization of waste***	The proposed development is not anticipated to result in a significant increase of waste. The proposed development will result in the more efficient use of land.
h)	***the orderly development of safe and healthy communities***	The proposed development is located within the built up area and allows for adequate area for the proposed uses.
i)	***the adequate provision and distribution of educational, health, social, cultural and recreational facilities***	The increase of density is not anticipated to have an impact on any of the listed facilities.
j)	***the adequate provision of a full range of housing, including affordable housing***	The proposed development will provide an increased range of housing to the area.

SECTION	PROVINCIAL INTEREST	ANALYSIS
k)	***the adequate provision of employment opportunities***	The increased density is not anticipated to have an impact on employment opportunities. Commercial uses and employment opportunities are located in proximity to the Subject Lands
l)	***the protection of the financial and economic well-being of the Province and its municipalities***	The proposed development creates a new parcel suitable for a dwelling unit that will expand the tax base of the municipality.
m)	***the co-ordination of planning activities of public bodies***	The proposed development is not anticipated to have an impact on this municipal service.
n)	***the resolution of planning conflicts involving public and private interests***	There are no conflicts related to the Subject Lands.
o)	***the protection of public health and safety***	The proposed development will not negatively impact public health and safety.
p)	***the appropriate location of growth and development***	The proposed development is within the Built-up Area of Old Town and has adequate municipal services accessible, therefore it is the preferred location for growth and development.
q)	***the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians***	The proposed development is located in proximity to a collector road (Mississauga Street) which provides a sidewalk for pedestrians. The proposed development is also presented at a human scale. There is no regularly scheduled public transportation in Old Town.

SECTION	PROVINCIAL INTEREST	ANALYSIS
r)	**the promotion of built form that:** **i.) is well-designed** **ii.) encourages a sense of place** **iii.) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant**	The proposed development facilitates a sense of place through the continuation of the distinct neighbourhood character of the Old Town urban area via the future development of two (2) single detached dwellings with similar size and scale to the existing neighbourhood.
s)	**the mitigation of greenhouse gas emissions and adaptation to a changing climate**	The increased density of the proposed development will provide a more efficient use of land, allowing a greater number of people to reside in the same area. This requires less consumption of land and allows the Town to mitigate a potential increase in greenhouse gas emissions.

Subsection 3(5) of the *Planning Act* requires that decisions of Council shall be consistent with provincial policy statements and shall conform with provincial plans that are in effect.

Section 34 of the *Planning Act* permits councils of local municipalities to pass and/or amend zoning by-laws for such purposes as may be set out in the by-law, and for regulating construction and land use within the municipality.

Section 51(16) of the *Planning Act* provides that an owner of land or the owner's agent duly authorized in writing may apply to the approval authority for approval of a plan of subdivision of the land or part of it. Section 51(24) and Section 53(12) of the *Planning Act* provides that:

Table 5.1.2: Analysis of Considerations for Draft Plan of Subdivision– Section 51(24) of Ontario *Planning Act*

SECTION	CONSIDERATIONS FOR CONSENT	ANALYSIS
	the health, safety, convenience, accessibility for	The proposed development will bring a gentle increase in density and increase the Town's housing supply. This will help ensure that the

SECTION	CONSIDERATIONS FOR CONSENT	ANALYSIS
	persons with disabilities and welfare of the present and future inhabitants of the municipality	welfare of present and future inhabitants is preserved.
a)	***the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2***	The proposed development supports the efficient use of existing infrastructure systems while representing an appropriate location for growth and development. The proposed development will result in an increase in residential lots within the Built-Up Area, supporting the continued provision of housing in Niagara-on-the-Lake.
b)	***whether the proposed subdivision is premature or in the public interest***	The proposed development is in the public interest as it will create a new lot to accommodate a future single detached dwelling in an established residential area.
c)	***whether the plan conforms to the official plan and adjacent plans of subdivision, if any***	The proposed development conforms to the NOP and Town OP as outlined in the following sections of this brief.
d)	***the suitability of the land for the purposes for which it is to be subdivided***	The severed and retained lots will be for residential use, consistent with the Official Plan designation. Both lots are appropriately sized to accommodate a single detached dwelling each. See Consent Sketch for more details.
d.1)	***if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing***	No affordable housing units are proposed; this is not applicable.
e)	***the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking***	Both lots will retain frontage onto a public road. The public road is municipally owned and maintained year-round providing adequate access to both lots.

SECTION	CONSIDERATIONS FOR CONSENT	ANALYSIS
	the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them	
f)	***the dimensions and shapes of the proposed lots***	Both proposed lot are regularly shaped and are consistent with the existing parcel fabric. Please see Appendix D – Streetscape Study for more information.
g)	***the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land***	There are no proposed restrictions on the Subject Lands.
h)	***conservation of natural resources and flood control***	There are no natural features present on the Subject Lands.
i)	***the adequacy of utilities and municipal services***	Municipal services are available on William Street and have sufficient capacity to support the proposed development.
j)	***the adequacy of school sites***	There are no active public schools within Old Town, however, the Subject Lands are in close proximity to Crossroads Public School located in Virgil. The proposed development is not anticipated to impact the capacity of nearby schools.
k)	***the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or***	No land will be conveyed.

SECTION	CONSIDERATIONS FOR CONSENT	ANALYSIS
	dedicated for public purposes	
l)	***the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy***	The proposed development will provide the opportunity utilize available services and infrastructure within the Old Town area.
m)	***the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated***	The lots would not be subject to Site Plan Control; this is not applicable

SUMMARY AND CONCLUSION

In summary, the proposed development and implementing applications have regard for matters of public interest and considerations for Consent in the *Planning Act* by proposing safe and orderly development that does not bring any adverse impacts to the community.

Consistency and conformity with Town policies are discussed in-depth in the subsequent sections of this brief. Subject to the analysis provided in the following sections of this brief, the Application is considered to comply with the provisions of the *Planning Act.*

5.2 Provincial Planning Statement (2024)

The Provincial Planning Statement (2024), hereinafter referred to as PPS, is a streamlined province-wide land use planning policy framework that replaces both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 while building upon housing-supportive policies from both documents. The PPS came into effect October 20, 2024.

The PPS sets the policy foundation for regulating land use in Ontario. It requires that developments make efficient use of land and services and supports opportunities for long-term economic prosperity.

POLICY

2.2 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:

b) permitting and facilitating:

1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents...*
2. *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;*

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

2.3 Settlement Areas and Settlement Area Boundary Expansions

2.3.1.1 Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including transit station areas.

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;

ANALYSIS

The Subject Lands are located within a settlement area, the preferred location for growth and development. The proposed development aligns with the policies above by facilitating residential intensification through the creation of a new lot within the Urban Boundary suitable for a single detached dwelling. The proposed development efficiently uses land and infrastructure, and provides a density suitable for new housing which is compatible with the existing area.

5.3 Niagara Official Plan

The Niagara Official Plan (NOP) has become adopted as an official plan of the Town of Niagara-on-the-Lake. The Subject Lands are designed as being within the Delineated Built-Up Area per Schedule B of the NOP and as such the following policies apply:

POLICY

2.2.1.1 Development in urban areas will integrate land use planning and infrastructure planning to responsibly manage forecasted growth and to support:

c) a diverse range and mix of housing types, unit sizes, and densities to accommodate current and future market-based and affordable housing needs;

e) built forms, land use patterns, and street configurations that minimize land consumption, reduce costs of municipal water and wastewater systems/services, and optimize investments in infrastructure to support the financial well-being of the Region and Local Area Municipalities;

g) opportunities for intensification, including infill development, and the redevelopment of brownfields and greyfield sites;

h) opportunities for the integration of gentle density, and a mix and range of housing options that consider the character of established residential neighbourhoods;

k) orderly development in accordance with the availability and provision of infrastructure and public service facilities

2.2.2.5 Regional minimum of 60 percent of all residential units occurring annually will be within built-up areas.

2.2.2.6 Local Area Municipalities shall establish intensification targets in their official plans that meet or exceed the targets identified in Table 2-2.

Municipality	*Units*
Niagara-on-the-Lake	*1,150*

2.3.1.1 The development of a range and mix of densities, lot and unit sizes, and housing types, including affordable and attainable housing, will be planned for throughout settlement areas to meet housing needs at all stages of life.

2.3.1.4 New residential development and residential intensification are encouraged to be planned and designed to mitigate and adapt to the impacts of climate change by:

a. facilitating compact built form

ANALYSIS

The proposed development aligns with the above policies through the creation of a new residential lot suitable for a single detached dwelling. The proposed development

facilitates the efficient use of land and a compact built form for future dwellings. This more compact built form will realise a form of gentle intensification through a built form and density which is compatible with the surrounding neighbourhood. The proposed development will also facilitate the efficient use of existing municipal infrastructure. The proposed development also assists the Town in achieving their intensification target of 1,150 housing units within the built-up area before 2051.

5.4 Town Official Plan

The Town of Niagara-on-the-Lake Official Plan guides long-term development in Niagara-on-the-Lake to ensure orderly and efficient growth of the Town. As mentioned, the Subject Lands are located in Old Town and are designated Established Residential (Schedule B) by the Town of Niagara-on-the-Lake Official Plan.

5.4.1 Growth Management

Section 6A - 3.2 of the Town OP provides that the objectives of the Town's growth strategy area as follows:

POLICY

Section 3.2

The objectives of the Town's growth strategy are to:

a. To accommodate all future urban growth within the present-day urban boundary;

d. Direct urban growth and development to the Town's existing Urban Areas.

e. Direct a minimum of 15% of the Town's future residential development to the Built-up Area located in Virgil, the Old Town, St. Davids, and Queenston through appropriate intensification.

g. Optimize existing infrastructure to provide for efficient use of infrastructure.

l. Develop compact, complete communities that include a diverse mix of land uses, a range of local employment opportunities and housing types, high quality open spaces, and easy access to local stores and services via automobile and active transportation and provide active transportation-friendly structures and amenities.

ANALYSIS

The proposed development aligns with the above policies through providing residential growth and intensification within the Built-up Area of the Old Town. As noted, the proposed development would allow for the future development of two single detached dwelling facilitating gentle intensification within Old Town. The proposed development is located within an existing and stable neighbourhood that allows for more optimal use of existing infrastructure.

5.4.2 Intensification Objectives

Section 6A – 4.4 of the Town OP provides the following intensification objectives and built-up area intensification policies:

POLICY

Section 4.4

The objectives of the intensification policies of this Plan are to:

c. Provide a policy framework that supports intensification and infilling throughout the Town's Built-up Area; and,

e. Direct intensification to the Built-up Areas where development will not impact designated heritage areas, adjacent heritage resources and/or heritage resources on the property, estate lots and the residential character of the property or the surrounding area.

The Town will support appropriate infilling and intensification within the limits of the Built-Up Area. The following policies apply:

a) *The Town plans to accommodate 15% of its forecasted intensification development within the Built-up Area between 2015 and 2031.*
b) *The predominant built form for intensification and redevelopment within the residential areas of the Built-up Area will be single detached, semi-detached and townhomes and low rise apartment buildings subject to the relevant development and compatibility policies of this plan.*
h) *The Town will ensure that intensification and redevelopment is consistent with the heritage and character of the Built-up Area. Urban design guidelines for the Built-up Area may be prepared and used as a tool to achieve compatible built form with intensification and redevelopment.*

Urban Design

a) *Infill and intensification sites should match the average pre-established building setback of adjacent buildings within the block face.*
d) *Bulk, mass and scale of new development shall fit the context within which it is located.*

ANALYSIS

The proposed development aligns with the above policies through the provision of gentle intensification within a Built-up Area. The proposed development would maintain the residential character of the Subject Lands and the surrounding area, as the severed and retained lots would fit within the range lot sizes for lots on the block face and the surrounding area as described in the Streetscape Analysis included in Appendix D to this PJB. The new dwellings would fit the context in which they are located as nearly all zoning requirements affecting built-form are retained.

5.4.3 Land Use Compatibility Policies

Section 6A – 4.6 of the Town OP provides that notwithstanding the requirements for a severance, site plan, plan of subdivision or plan of condominium, intensification development within the Built-up Area should be compatible with surrounding existing and planned land uses as shown in the Land Use Schedules of this Plan. Intensification and/or redevelopment should be consistent with matters identified in Table 1 below:

POLICY & ANALYSIS

Table 1. Section 6A - 4.6 Analysis

Policy		***Analysis***
i.	***The existing and/or planned built form and heritage of the property and surrounding neighbourhood;***	The proposed development would facilitate the future development of two single-detached dwellings. This dwelling form is consistent with the surrounding built form.
ii.	***The existing and/or planned natural heritage areas of the site and within the surrounding neighbourhood;***	The Subject Lands do not contain any natural heritage features.
iii.	***The existing and/or planned densities of the surrounding neighbourhood; and,***	The proposed development allows the Subject Lands to provide a density that is consistent with the surrounding neighbourhood.
iv.	***The existing and/or planned height and massing of buildings within the surrounding neighbourhood.***	The height and massing will conform to the governing Zoning By-law and be consistent with the surrounding neighbourhood.
v.	***Development proposals will demonstrate compatibility and integration with surrounding land uses by ensuring that an effective transition in built form is provided between areas of different development densities and scale. Transition in built form will act as a buffer between the proposed development and existing uses and should be provided through appropriate height, massing, architectural design, siting, setbacks, parking, public and***	The proposed development would facilitate gentle intensification within the neighbourhood. The proposed development will allow for the future development of two low-rise single detached dwellings, a built form that characterizes the area and would not introduce any compatibility issues. As discussed in the Streetscape Analysis in Appendix D, the proposed development would provide lot sizes and densities consistent and compatible with the surrounding lands. No site specific zoning amendments are proposed related to height or parking. A site specific provision is requested for lot

Policy	Analysis
private open space and amenity space.	coverage. This is analyzed further in Section 6.1 of this brief.
vi. Intensification and/or redevelopment shall be compatible and integrate with the established character and heritage of the area and shall have regard to: - ***Street and block patterns*** - ***Lot frontages lot area, depth*** - ***Building Setbacks*** - ***Privacy and over view*** - ***Lot grading and drainage*** - ***Parking*** - ***Servicing***	Lot frontage, area, and depths have been analyzed within Appendix D – Streetscape Analysis. Setbacks will be regulated by the Town Zoning By-law. A zoning analysis is included within Section 6.0 of this brief. Other matters will be investigated further at the building permit stage.

5.4.4 Residential Infill and Intensification Policies (OPA 78)

Section 6A - 4.6 of the Town OP includes policies regarding residential infill and intensification. The purpose of the policies is to "provide additional residential infill and intensification policies to the Town OP to guide residential infill and intensification development in the Built-up Areas of Old Town and Virgil within the Town of Niagara-on the-Lake." Table 2, below provides an analysis of relevant infill and intensification policies:

POLICY & ANALYSIS

Table 2. Analysis of Residential Infill and Intensification Policies

Policy	Analysis
a) the lot frontage(s) and lot area(s) of the proposed new lot(s) shall be consistent with the sizes of existing lots on both sides of the street on which the property is located	This policy is intended to ensure that new development is not out of character with the surrounding context. The character of the neighbourhood relates to lands with frontage on William Street. As shown in Appendix D, the lot frontages along William Street vary, and the proposed lot frontages would be aligned with this varied streetscape. The proposed development would also be in keeping with the low rise, low density residential character surrounding the Subject Lands.

Policy	***Analysis***
b) the proposed new building(s) shall have heights, massing and scale appropriate for the site and generally consistent with that permitted by the zoning for adjacent properties and properties on the same street	Two site-specific zoning provisions are proposed: 1. recognize the change in lot frontage of the retained and severed parcels. 2. permit an increase in lot coverage All other standard ER zoning provisions will apply. Please see Section 6.1 of this brief for further analysis regarding the proposed site-specific provisions.
c) front and rear yard setbacks for the new building(s) shall be consistent with the front and rear yards that exist on the same side of the street	There are no site-specific provisions proposed regarding front and rear yard setbacks.
d) the setback between new building(s) and the interior side lot line shall increase as the lot frontage increases	Interior side yard setbacks will be in accordance with existing zoning provisions.
e) the new building(s) shall have a complementary relationship with existing buildings, while accommodating a diversity of building styles, materials and colours	Site Plan control does not apply. The lots will be suitable for single detached dwellings consistent with the existing neighbourhood.
f) existing trees and vegetation shall be retained and enhanced through new street tree planting and additional on site landscaping;	A TIPP has been prepared to investigate tree loss as a result of the proposed development. One tree on the Subject Lands will have to be removed to accommodate a future dwelling on Part 2. Three trees located at 390 Simcoe Street will also need to be removed to accommodate future development. The owner of 390 Simcoe Street has offered no objection to the removal of these trees. There is sufficient space on the lots for future landscaping and replacement tree planting. The existing hedges that are within the right-of-way are proposed to be relocated

Policy	Analysis
	onto the Subject Lands. If relocation is not possible they will be removed.
g) the width of the garage(s) and driveway(s) at the front of new building(s) shall be limited to ensure that the streetscape is not dominated by garages and driveways;	There are no site-specific zoning provisions proposed that would impact the width of garages or driveways.
h) new driveways and service connections shall be sited to minimize tree loss;	The location of driveways and servicing will need to be addressed through future building permit applications.
i) impacts on adjacent properties shall be minimized in relation to grading, drainage, access and circulation, privacy and microclimatic conditions such as shadowing;	Grading, drainage and access will be addressed through future building permit applications. As there is no relief sought regarding increased height or reduced setbacks, impacts regarding privacy or shadowing are not anticipated.
j) the orientation and sizing of new lots shall not have a negative impact on significant public views and vistas that help define a residential neighbourood;	There are no significant public views and vistas that are anticipated to be impacted.
k) Proposals to extend the public street network should be designed to improve neighborhood connectivity, improve local traffic circulation, and enhance conditions for pedestrians and cyclists.	This does not apply to the proposed development.
l) road and/or municipal infrastructure shall be adequate to provide water and wastewater service, waste management services and fire protection.	The Subject Lands front a public road and municipal services, water and sanitary services. The Town Operations department reviewed the proposed development during the pre-consultation meeting dated February 19, 2026 and did not have any concerns regarding these services.

5.4.5 Residential Goals and Objectives

Section 9 of the Town OP provides objectives and policies pertaining to the residential land use designation. The following apply:

POLICY

Section 9.2 GOALS AND OBJECTIVES

(1)To ensure that sufficient lands have been placed in a Residential designation to accommodate the anticipated population in a suitable variety of locations, densities and unit types.

(3) To ensure that new development or redevelopment is appropriately located, is compatible with surrounding land uses, incorporates energy efficient aspects in its design, retains to the greatest extent feasible desirable natural features and uses land in an efficient manner.

(4) To encourage the development of economical housing in a suitable environment

(7) To encourage infill residential development of vacant or underutilized parcels of land in residential areas where such development will be compatible with existing uses and where it will contribute to the more efficient use of sewer and water services and community facilities.

ANALYSIS

The proposed development aligns with the above goals and objectives through facilitating new development and land within the built-up area of Niagara-on-the-Lake. The proposed development provides housing through the provision of smaller lot sizes and compatible infill development. The proposed development will conform to the existing character of the neighbourhood (See **Appendix D** for Streetscape Analysis).

5.4.6 Residential Goals and Objectives

Section 9.3.3(1) of the Town OP permits single-detached dwellings as a main use within the Established Residential designation. Section 9.3.3(3) of the Town OP provides that "within the Established Residential Designation applications for consent to sever will be accompanied by a detailed site and area analysis demonstrating that there will be minimal impact on surrounding residential uses, streetscapes and the character of the area." Section 9.3.3(3)(C) provides a list of considerations for analysis applicable to all lands within the Established Residential (ER, ER2 and ER3 and relevant site-specific) Zones in Old Town regarding applications proposing changes to lot frontage and/or depth. An analysis of these policies is included in Table 3 below:

POLICY & ANALYSIS

Table 3. Requirements for Consent to Sever in Established Residential Zones

Policy	*Analysis*
The average lot frontage and lot depth of the existing parcels on the block face	The frontages proposed are consistent with the existing streetscape, as identified in the Streetscape Analysis provided in Appendix D. The proposed development is also keeping with the low-rise, low density residential character of the surrounding Subject Lands.
In the case of corner lots, average lot frontages and lot depths shall be calculated on both block faces	Not applicable.

Policy	***Analysis***
The relevant Intensification policies of the Official Plan	The proposed development conform with the intensification policies of the Town OP as described in previous sections of this PJB.
A streetscape study	The streetscape analysis included in Appendix D to this PJB shows how the proposed severed and retained lots relate to their surrounding context.
A Planning Justification study	This PJB fulfills this requirement.
An Arborist report which shall consider the potential impacts on all trees and addresses Carolinian Canada species	As discussed in Section 4.2 of this PJB, the proposed development will result in the loss of four trees. On balance, the loss of trees, appears to be outweighed by the benefit of facilitating lot creation for a new, compatible, single detached dwelling with space for future landscaping.
Estate Lots and relevant policies	The Subject Lands are not identified as an Estate Lot.
Existing and proposed land uses on the subject lands and surrounding lands	The proposed lot would fit in with the surrounding low density residential character.

5.4.6 Consent Policies

Section 21.2 of the Town OP provides policies related to consent applications. Table 4 below provides an analysis of the general consent policies:

POLICY

(1) Under certain circumstances, where a Plan of Subdivision is not necessary for proper and orderly development, a consent to a land conveyance may be granted in accordance with the following principles in addition to the policies contained within the Regional Niagara Policy Plan. In all cases, the preservation of prime agricultural land from the encroachment of urban-type development shall be a primary objective.

(2) The Town will recommend to the Land Division Committee that consent for land severance where new development will be permitted to occur on previously vacant sites should be granted only when it has been established that soil and drainage conditions are suitable to permit the proper siting of building to obtain a sufficient and potable water supply and to permit the installation of an adequate means of sewage disposal.

(3) The Town will recommend to the Land Division Committee that consents for severance where the site already contains, should only be permitted if existing sanitary sewage disposal, water supply and drainage are adequate

and the new lot lines to be created do not render any aspect of such services unsatisfactory.

(4) The Town will recommend to the Land Division Committee that consents shall be granted only when the land fronts on an existing public road. The public road is to be of reasonable standard of construction and maintained year-round. If the effect of a consent would be to requires a greater standard of road construction across the frontage of the site in question or beyond that site and/or other municipal services, then the applicant many be required to contribute to the cost of such improvement through a written agreement with the public authority having jurisdiction. In the case of a Local Road, Council will make the determination and its decision will take into consideration:

a. The benefit versus cost; and,

b. whether the improvement required is needed on a short or long term basis.

(5) Consents should have the effect of infilling in existing urbanized areas and not of extending the urban area.

(6) The size of any parcel of land created by a consent should be appropriate for the proposed use and without limiting the generality of the foregoing:

a. The lot area and frontage should not be less than the requirements for the relevant classification in the implementing by-law.

b. Where existing buildings are involved, the proposed new lot lines shall take into account required yard and setbacks set out in the Zoning By-law.

c. Where land is in an urban area, any land which is fully serviced shall respect the valuable resource of serviced land and the lots created should not greatly exceed the minimum standards of the zoning by-law.

(7) The Town will recommend to the Land Division Committee that consents should not be granted for land adjacent to a road from which access to is to be obtained where a traffic hazard would be created because of limited sight lines on curves or grades.

(8) The Town will recommend to the Land Division Committee that a plan of subdivision would be more appropriate where the number of lots being created by consent would have a significant impact on the surrounding neighbourhood.

(9) Proposed new lots lines shall take into account the existing pattern of surrounding lands. Wherever possible, the new lines shall avoid creating irregular boundaries for the parcel in question or that remaining. Where lands in the Agricultural designation are affected, every attempt shall be made to avoid creating a lot pattern which would make it difficult to farm.

ANALYSIS

The proposed development aligns with the above policies by providing compatible infill development in an area with existing adequate municipal services which conforms to

the NOP. The proposed development proposes regularly shaped lots compatible with the area and does not propose new lot lines or changes that will render any municipal services unsatisfactory. Further, there are no anticipated traffic hazards that would result from the creation of a new lot.

The proposed lots will both front onto William Street and are appropriately sized for their intended residential use. As the Town Zoning By-law provides that lot frontage and lot depth be as existing, any lot creation in the Established Residential (ER) Zone would require a Zoning By-law Amendment. Subject to approval of the Zoning By-law Amendment application, the proposed lots would meet the requirements in the Town Zoning By-law for lot frontage. The retained lot would comply with the provisions of the town Zoning By-law regarding setbacks.

6.0 Proposed Zoning By-law Amendment

The Subject Lands is presently zoned Established Residential in accordance with Zoning By-law No. 4316-09. The following table assesses Part 1 and Part 2 against the requirements for the ER Zone in the Town Zoning By-law.

Table 4. Zoning Analysis Table

Regulations	ER Zone Requirement	Part 1 Proposed	Part 2 Proposed	Compliance
Minimum Lot Frontage	As existing	16.2 m	16.2 m	No
Minimum Front Yard Setback	7.5 m	7.5 m	7.5 m	Yes
Minimum Rear Yard Setback	7.5 m	7.5 m	7.5 m	Yes
Minimum Interior Side Yard Setback	1.22 m	1.22 m	1.22 m	Yes
Maximum Building Height	10.0 m	<10.0 m	<10.0 m	Yes
Minimum Rear and Side Yard Setback for Accessory Buildings	1.52 m	N/A	1.55 m	Yes
Maximum Lot Coverage	33%	45%	45%	No
Minimum Landscaped Open Space	30%	<30%	<30%	Yes

6.1 Zoning Relief Justification

Lot Frontage:

Proposed: 16.2 metres

Required: As existing

The proposed change in lot frontage can be supported as:

- The proposed frontage provides sufficient space to accommodate a single detached dwelling on each lot with space for driveway access and landscaping.
- The proposed frontage maintains a regular lot fabric along William Street.
- The proposed frontage is generally consistent with other lot frontages along William Street, namely 164 William Street (15 metre frontage) and 170 William Street (19 metres). Accordingly, the proposed frontages will be consistent with the streetscape and no negative impacts to adjacent dwellings are anticipated.

Lot Coverage:

Proposed: 45%

Required: 33%

The proposed increase in lot coverage can be supported as:

- The future detached dwellings can be fully accommodated within all other required setbacks, demonstrating that the increased coverage does not facilitate over-development.
- Despite the increase in lot coverage the lot maintains adequate space for soft landscaping, tree planting, stormwater drainage, and outdoor amenity areas, ensuring the residential nature of the site is maintained.
- Due to the narrow nature of the lots, the increased lot coverage is not anticipated to be evident from streetview. Accordingly, no negative impacts to the streetscape are anticipated.
- As the proposed dwelling is a single storey rather than two storeys, the overall building mass, scale, and visual presence are significantly reduced. This ensures the dwelling remains compatible with neighbouring homes despite a larger coverage.

Further to the above, additional conceptual elevations, floor plans, and a conceptual site plan have been included as part of this application.

The conceptual site plan illustrates how the property could be developed at 45% lot coverage with a two storey dwelling while maintaining full compliance with all other applicable zoning requirements. These materials are illustrative only and are intended to demonstrate potential building design, massing, and lot coverage under the proposed zoning framework, wherein all standards of the ER Zone are maintained except for the requested increase in lot coverage and lot frontage.

The conceptual site plan demonstrate that a future development with 45% lot coverage on Part 2 would continue to provide ample front and rear yard landscaped areas, supporting tree planting, outdoor amenity use, and appropriate drainage and infiltration.

The concept further illustrates that the increased lot coverage does not result in overdevelopment of the lot, as all other zoning setbacks (including front, rear, and side yard) are fully maintained. Maintaining these setbacks ensures the dwelling remains appropriately scaled to the lot and compatible with the established built form of the neighbourhood, consistent with the intent of lot coverage provisions to prevent oversized or intrusive development.

Further, due to the narrow nature of the lot, the massing of the proposed dwelling would not present as visually prominent from the streetscape. Additionally, approximately 11.1% of the proposed lot coverage is attributed to a front covered porch (approx. 20 sqm) and rear covered patio (approx. 50 sqm), both of which enhance functional amenity space without contributing to excessive massing. The front covered porch, in particular, reinforces passive surveillance and contributes positively to the traditional streetscape character of Old Town and William Street. This supports the broader intent of lot coverage regulations to balance built form with high quality outdoor space and streetscape compatibility.

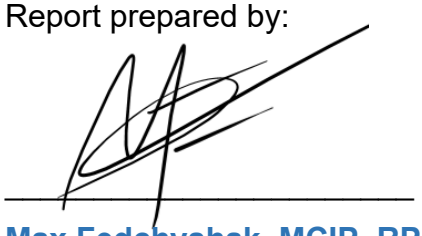
In summary, as demonstrated via the conceptual site plan, the proposed 45% lot coverage is appropriate as it maintains all required setbacks, preserves meaningful landscaped open space for drainage and amenity areas, and results in a built form that remains compatible with the character of William Street.

7.0 Summary and Conclusion

It is our opinion the proposed Zoning By-law Amendment represent good land use planning, are in the public interest and should be approved for the following reasons:

- The proposed development is consistent with the Provincial Planning Statement, and conforms with the Niagara Official Plan, and the Town of the Niagara-on-the-Lake Official Plan;
- The proposed development maintains the character of the neighbourhood;
- The proposed development facilitates infill residential development within the Built-up Area and Established Residential Area of Old Town, contributing to the range and mix of housing types and efficient and optimized use of lands and municipal infrastructure;
- The proposed development increases the housing stock of the Town, helping reach the larger goals of the Region.

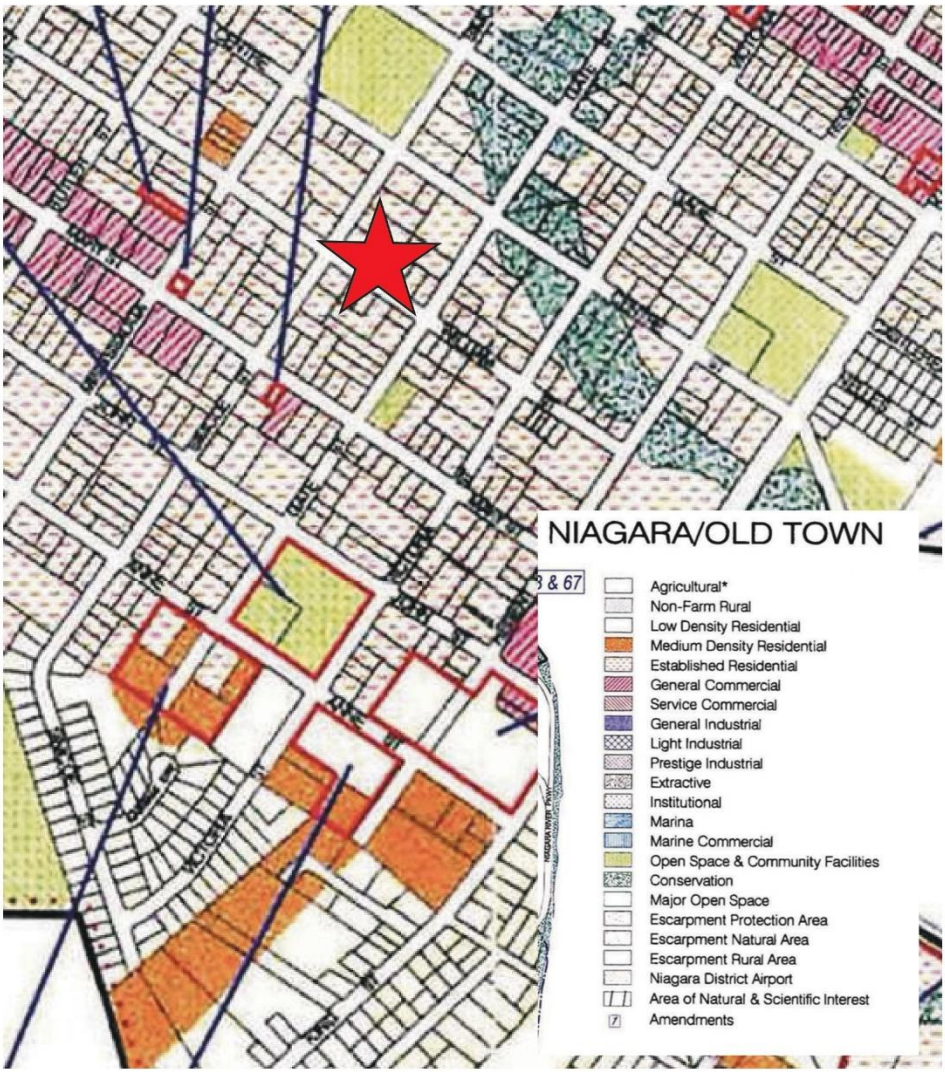
Report prepared by:



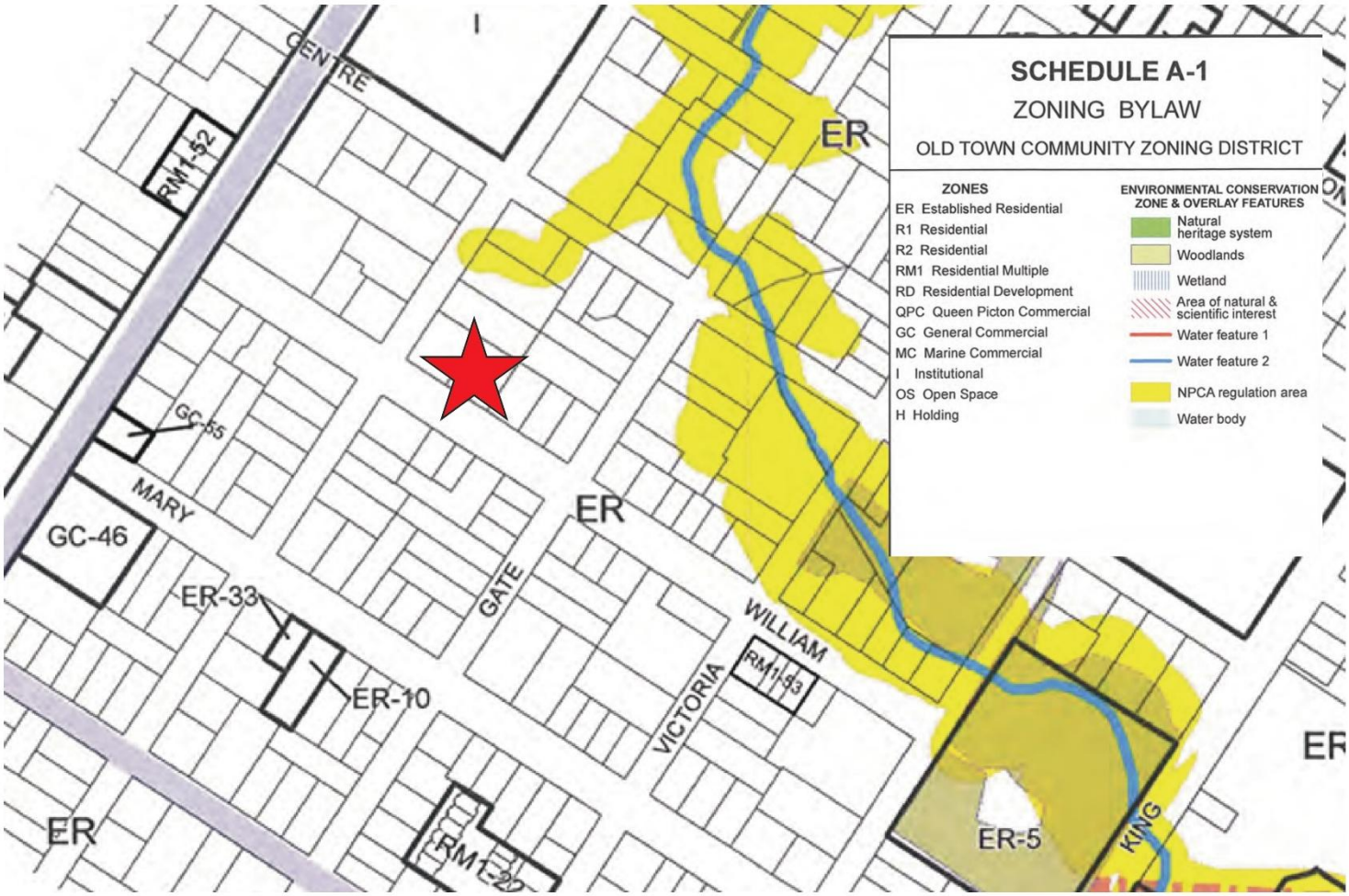
Max Fedchyshak, MCIP, RPP
Senior Planner and Partner
NPG Planning Solutions Inc.

8.0 Appendices

Appendix A – Town Official Plan Schedule



Appendix B – Zoning By-law Schedule



Appendix C – Draft Zoning By-law Amendment

THE CORPORATION

OF THE

TOWN OF NIAGARA-ON-THE-LAKE

BY-LAW NO. 4316##-XX

189 William Street

Roll # 262701000408900

A BY-LAW PURSUANT TO SECTION 34 OF THE ONTARIO *PLANNING ACT* TO AMEND BY-LAW NO. 4316-09, AS AMENDED, ENTITLED A BY-LAW TO REGULATE THE USE OF LAND AND THE CHARACTER, LOCATION AND USE OF BUILDINGS AND STRUCTURES THEREON.

WHEREAS the Town of Niagara-on-the-Lake Council is empowered to enact this By-law by virtue of the provisions of Section 34 of the *Planning Act,* R.S.O. 1990, c.P.13, as amended;

AND WHEREAS this By-law conforms to the Town of Niagara-on-the-Lake Official Plan;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWN OF NIAGARA-ON-THE-LAKE enacts as follows:

1. That Schedule 'A-1' of By-law 4316-09, as amended, is further amended by changing the zoning of the subject lands shown on the schedule attached hereto and forming part of this By-law from Established Residential (ER) Zone to Established Residential (ER-##) – Site Specific Zone".

2. That Section 7.14 – Site Specific Exemptions, as amended, is hereby further amended by adding the following:

   7.14.XX **189 William Street – See Map A (ER-YY)**

   Notwithstanding the provisions of the Established Residential (ER) Zone, for lands identified as ER-XX on Schedule 'A-1', the following provisions shall apply:

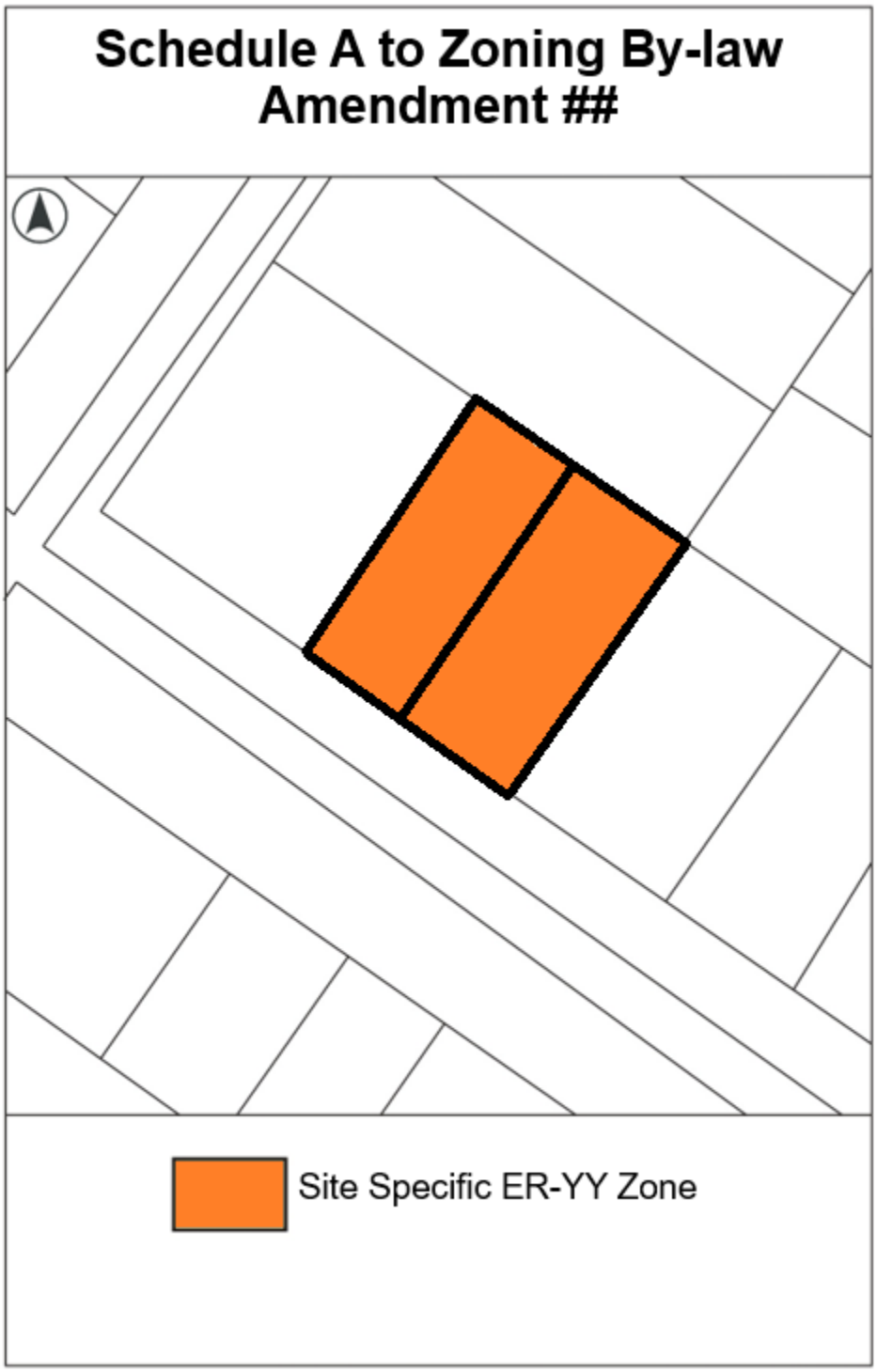
   7.14.XX.1 Zone Requirements:

(a)	Minimum lot frontage	16.2 m
(b)	Maximum lot coverage	45%

4. All other provisions of Zoning By-law 4316-09, as amended, shall continue to apply to the lands shown on the attached Schedule.

READ A FIRST, SECOND AND THIRD TIME THIS _____ DAY OF _____, 202X.

_____	_____
LORD MAYOR	TOWN CLERK
GARY ZALEPA	GRANT BIVOL


Schedule A to Zoning By-law Amendment ##
Site Specific ER-YY Zone

Appendix D - Streetscape Study

Section 9.3.3 (3)c) of the Town of Niagara-on-the-Lake Official Plan requires a streetscape study for developments that are proposing a change to lot frontage. The proposed development consists of Consent and Zoning By-law applications to sever the Subject Lands into 2 lots (one retained and one severed). Accordingly, this will result in a change in lot frontage. This Streetscape Study will aim to analyze the adjacent streetscape character of William Street and surrounding areas in relation to the proposed development to ensure that the character of the area is maintained.

Methodology

The purpose of this Streetscape Study is to evaluate the potential impacts of the proposed development within the immediate area. This analysis satisfies the requirements for a Streetscape Study through the:

- Review and inventory of the surrounding context informed through measurements based on Niagara Navigator's aerials imagery and GIS mapping using Open Data.
- Identification and assessment of streetscape characteristics with potential for impact. Relevant policies under the Town's Official Plan will also be addressed.
- Provision of conclusion based on the investigation and observation.

Existing Condition

Location of the Study Area

The analysis focuses solely on the properties closest to and excluding the Subject Lands, that front onto Williams Street and neighbouring roads. These properties demonstrate the existing character of the immediate neighbourhood.

Streetscape Character

The surrounding neighbourhood is characterized by single detached dwellings, that range from one to two storeys in height **(see Photos 1-8).** The streetscape is lined with ample vegetation and generous landscaping that arrange in a haphazard, natural orientation rather than strict patterns, preventing the street from feeling monotonous. In addition, the varied lot frontages and absence of sidewalk provides a sense of uniqueness and expands on the organic feeling.

Lot configurations within the Study Area feature significant variation, please see Table 1 below for Streetscape Calculations. The surrounding lands range from irregularly shaped lots (160 William Street) to nearly square rectangles (176 William Street). The front yard setbacks are generally consistent, especially on the north side of William Street, with some exceptions generally on the south side of William Street.

Photo 1. Photo of the frontage of 189 William Street, the Subject Lands.

Photo 2. Google Streetview image of 164 William Street, located across the street from the Subject Lands. (Source: Google Streetview, 2023)

Photo 3. Photo of 170 William Street, located directly across the street from the Subject Lands.

Photo 4. Photo of 176 William Street, immediately adjacent to 170 William Street and also across the street from the Subject Lands.

Photo 5. Google Streetview image of 180 William Street, located at the intersection of William Street and Simcoe Street. (Source: Google Streetview, 2025)

Photo 6. Google Streetview image of 165 William Street, located immediately east of the Subject Lands. (Source: Google Streetview, 2023)

Photo 7. Google Streetview image of 161 William Street. (Source: Google Streetview, 2023)

Photo 8. Google Streetview image of 407 Gate Street, located at the intersection of Gate Street and William Street (Source: Google Streetview, 2025)

Evaluation of the Proposed Development

To assess the impact of the proposed development on the streetscape and surrounding neighbourhood, key characteristics were identified. Namely, lot area, lot frontage, lot depth, and front yard setback were quantified for analysis.

Table 1 provides an in-depth analysis of streetscape characteristics for the properties surrounding the Subject Lands, whereas **Table 2** provides a brief summary of the streetscape character analysis, and a comparison to the proposed new lots.

Table 1 demonstrates the large variation in lot size and dimensions that is present within the study area, with the smallest lot being 164 William Street located across the street from the Subject Lands, and the largest lot being 370 Simcoe Street, located immediately to the rear of the Subject Lands. The Subject Lands are currently the largest lot with frontage on William Street. However, following severance both the retained and severed lots will feature areas more comparable with the existing streetscape (642.5 sqm). The proposed development will fit within the established range of lot size and dimension, while providing more variability to the neighbourhood to further the existing character. Each characteristic is expanding on in the following sections.

Table 1: Streetscape Calculations.

No.	Municipal Address	Lot Area (sqm)	Lot Frontage (m)	Lot Depth (m)	Front Yard Setback (m)	Lot Coverage (%)
SUBJECT LANDS	189 William Street	1,285	32.46	39.62	8.05	12
ANALYSIS						
1	370 Simcoe Street	1,313	20.5	64.5	5.75	36
2	390 Simcoe Street	1,275	32	32	9.5	20
3	165 William Street	988	25	39.7	8.5	23
4	161 William Street	794	20	39.7	8.25	37
5	393 Gate Street	788	40	20	5	38
6	416 Simcoe Street	640	16	40	12	24
7	180 William Street	560	20	28	5	42

No.	Municipal Address	Lot Area (sqm)	Lot Frontage (m)	Lot Depth (m)	Front Yard Setback (m)	Lot Coverage (%)
8	176 William Street	560	20	29	4	61
9	170 William Street	532	19	30	N/A	11
10	164 William Street	441	15	29	2	30
11	160 William Street	1,610	23	46	5	14
12	407 Gate Street	465	15	31	0	23
13	413 Gate Street	510	16.5	31.5	5	28
14	415 Gate Street	478.5	15.5	31.5	7.75	37
Average/Dominant Character		782	21	35	6	30

Table 2: Summary of the Streetscape Character Analysis

Municipal Address	Lot Area (sqm)	Lot Frontage (m)	Lot Depth (m)	Front Yard Setback (m)	Lot Coverage (%)
Average/Dominant Character	782	21	35	6	30
Part 1	642.5	16.2	39.62	7.5	45
Part 2	642.5	16.2	39.62	7.5	45

Lot Area

The proposed development will result in two new parcels that feature areas of 642.5 square metres. This is slightly smaller than the average lot area within the study area of 784 square metres. However, the proposed parcels' lot areas are closely aligned to the median of the dataset, being 600 square metres. This shows that the proposed development is firmly within the existing character of the neighbourhood. It is also noted

that the lots located directly across the street from the Subject Lands, being 164 William Street and 170 William Street, feature lot areas of 441 square metres and 531 square metres respectively. Following severance the lot areas of both the retained and severed lots will be more larger than those immediately across the street and consistent with the streetscape along this portion of William Street.

Lot Frontage

The new parcels created to facilitate the proposed development will have frontages of 16.2 metres. Again, this is slightly below average for the area, yet multiple properties have a lot frontage that are smaller and larger than the proposed frontages, reaffirming the variation of this streetscape, which is a main characteristics of the existing neighbourhood.

Lot Depth

The Subject Lands' lot depth is consistent with the existing depth of the properties located immediately adjacent to them. The lot depth along the north side of William Street is consistent and the proposed severance will not alter this.

Front Yard Setback

The proposed development will conform to the existing provisions in Zoning By-law 4316-09, including the front yard setback. The front yard setbacks on neighbouring properties on the north side of William Street are largely identical at approximately 8 metres. The proposed development will maintain a similar distance from the lot line in accordance with the Town Zoning By-law.

Lot Coverage

Lot coverage estimates contained within **Table 3** below were prepared using Niagara Navigator aerial imagery, with building footprints and lot areas measured directly from the platform's lot boundary and area-measurement tools. Please see **Table 3** below for a detailed analysis.

The new parcels created to facilitate the proposed development will have lot coverages of 45%. While this is above the average for the area, it is not unprecedented. William Street contains lots with up to 61% lot coverage (176 William Street), with other lots close to the proposed 45% (namely 180 William Street with approximately 42% coverage) once again demonstrating the level of variation within this streetscape. Notably, the Subject Lands currently feature one of the lowest lot coverages in the area, reflecting an outlier from the existing streetscape average.

Table 3: Lot Coverage Analysis

No.	Municipal Address	Approximate Building Area (m^2)	Approximate Lot Area (m^2)	Approximate Lot Coverage (%)
SUBJECT LANDS	189 William Street	155.9	1,285	12
1	370 Simcoe Street	473	1,313	36
2	390 Simcoe Street	250	1,275	20
3	165 William Street	224	988	23
4	161 William Street	291	794	37
5	393 Gate Street	300	788	38
6	416 Simcoe Street	152	640	24
7	180 William Street	235	560	42
8	176 William Street	342	560	61
9	170 William Street	56*	532	11
10	164 William Street	133	441	30
11	160 William Street	232	1,610	14
12	407 Gate Street	106	465	23
13	413 Gate Street	143	510	28
14	415 Gate Street	178	479	37
Average/Dominant Character		223	782	30
* Per Areial Imagery, dwelling at 170 William Street appears to be located within the William Street road allowance.				

Summary

The proposed development is consistent with key attributes that identify the character of the surrounding neighbourhood. The above analysis confirms that the proposed development will respect and reinforce the built environment and established streetscape in the area.