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April 12, 2023

Municipality of Middlesex Centre
10227 Ilderton Road
Ilderton, ON
N0M 2A0

Attention: Mr. James Huston (Clerk)

RE: Middlesex Centre Comprehensive Review: Zoning By-law

Dear Mr. Huston,

Please consider this letter as a summary of comments regarding the Municipality of Middlesex Centre Comprehensive Review of the Zoning By-law and associated materials, specifically the redline amendment to the Comprehensive Zoning By-law (ZBL) No. 2005-005 and draft key mapping.

In our review of the redline amendment to the Comprehensive ZBL, we would like to provide support in regards to the proposed addition of the following:

- Definitions for alternative forms of housing inclusive of additional residential units (ARU's), garden suites, live-work dwelling, back-to-back townhouse dwelling, cluster townhouse dwelling and stacked townhouse dwelling;
- Provisions pertaining to ARU's in accordance with section 9.6, subsection 9.6.1 of OPA No.59 adopted by Council in May 2022;
- Provisions pertaining to garden suites in accordance with section 9.7 of OPA No.59 adopted by Council in May 2022; and
- Expansion of permitted uses within the Urban Residential First Density (UR1), Urban Residential Second Density (UR2) and Urban Residential Third Density (UR3) zones to permit ARU's in accordance with provincial policy, in addition to other alternative forms of housing.



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Notwithstanding the above, in review of the redline amendment to the Comprehensive ZBL and draft key mapping, we have concerns with the following:

Section 4.2 (a) – Additional Residential Units

- The provision set out under subsection 4.2 (a) states that ARU's are permitted in any residential zone that permits a single detached, semi-detached or street townhouse dwelling. The Planning Act stipulates that an ARU may be located within a detached house, semi-detached house or rowhouse. Policy 9.6.1 (Additional Residential Units) of adopted OPA.59 for Middlesex Centre notes that *"ARU's are [to be] permitted in all designations where single detached, semi-detached and rowhouse (townhouse) dwelling units are permitted"*. It is in our opinion that ARU's should also be permitted within townhouse dwellings and cluster townhouse dwellings to allow for ARU's within new or existing Plan of Vacant Land Condominium (VLC) developments. The regulations of the Planning Act and policies of adopted OPA No.59, do no limit ARU's to only being permitted within street fronting townhouse dwellings.

Section 4.9 (e) – Garden Suites

- The provision set out under subsection 4.9 (e) states that a garden suite shall only be permitted on a lot which has frontage on an improved public street. This does not provide opportunity for a garden suite within existing or new Plan of VLC developments which operate similar to an existing or new Plan of Subdivision development. In review of section 39.1 of the Planning Act and policy 9.7 of adopted OPA No.59, there is no requirement for a garden suite to be located on a lot with frontage onto a public road. It is in our opinion that garden suites should also be permitted on lots within new or existing Plans of VLC.

Sections 7.0, 8.0 and 9.0 - Urban Residential First, Second and Third Density Zones

- The provisions set out under subsections 7.1.7, 8.1.10, and 9.1.12 include a general maximum lot coverage of 35% for the main building (38% for all



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buildings including accessory structures) applicable to all permitted uses within the Urban Residential First Density (UR1), Urban Residential Second Density (UR2) and Urban Residential Third Density (UR3) zones. As aforementioned, Sifton is in support of expanding the list of permitted uses within these respective zones. However, it is in our opinion that maximum lot coverage should be broken down further to reflect more compact housing forms. For Example, the UR3-11 site specific zone approved for a block in Sifton's Clear Skies subdivision in Ilderton permits 62% lot coverage for a semi-detached dwelling, townhouse dwelling, street townhouse dwelling, multiple unit dwellings or apartment dwelling. The UR3-12 site specific zone approved for two blocks in Sifton's Timberwalk subdivision in Ilderton permits 50% lot coverage for a single detached dwelling and 62% lot coverage for a semi-detached or townhouse dwelling. By breaking down maximum lot coverage specific to those uses permitted in each of the respective urban residential density zones, this may limit the volume of site-specific zoning by-law amendment (ZBA) or minor variance (MV) requests received by the Municipality;

- The provisions set out under Section 9.0 UR3 Zone appear incomplete. A consolidated list of comments applicable to the provisions of the UR3 zone is provided below:

<u>UR3 Zone</u>	<u>Comments</u>
9.1.2 Minimum Lot Area	No provision for minimum lot area for back-to-back, stacked or cluster townhouse dwellings.
9.1.3 Minimum Lot Frontage	No provision for minimum lot frontage for stacked townhouse dwellings.
9.1.6 Minimum Side Yard Setback	Provision for cluster townhouse dwelling is the same as a street townhouse dwelling. Provision for minimum lot frontage for a cluster townhouse dwelling based on the entirety of the block. Minimum side yard setback for cluster townhouse dwelling does not seem appropriate if zoning to be interpreted back on the entirety of the block.
9.1.8 Minimum Floor Area	Townhouse dwelling referenced although removed from list of permitted uses.



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- The provision set out under subsection 9.1.10 notes maximum density of 30 units per hectare (UPH). It is in our opinion that this provision should be reviewed with consideration for more compact, higher density dwelling types that are proposed to be added to the list of permitted uses for the UR3 zone. For Example, a Sifton development project located at 3480 Morgan Avenue in London, where stacked townhouse dwellings are proposed, is planned at a density of 87 UPH; and
- Townhouse dwellings are proposed for removal from the list of permitted uses per subsection 9.1.1 of the UR3 zone. This type of dwelling was previously and is currently being utilized by Sifton for Plan of VLC townhouse development projects. It is unclear to Sifton what form of dwelling type will be used to inform future Plan of VLC townhouse development projects. Currently, zoning for Plan of VLC townhouse development projects is interpreted on a lot by lot basis. In review of alternative forms of townhouse dwelling types such as cluster townhouse dwellings, it is our understanding that zoning would be interpreted based on the entirety of the block and not on a lot by lot basis. Sifton would appreciate clarity from the Municipality regarding how Plan of VLC townhouse developments will be captured in future.

Key Map U-07

- It is to be noted that Sifton's lands located south of Timberwalk subdivision and outlined in Appendix A to this letter, continue to reflect Office Park Commercial (C3) and Light Industrial (M1) zoning. Per Schedule A-7 of adopted OPA No.59, these lands were re-designated to Residential with a Special Policy Area overlay (SPA #29). Sifton respectfully requests that the Municipality re-zone these lands to Urban Residential First Density (UR1) & Urban Residential Third Density (UR3), to establish dual zoning, as part of the administrative comprehensive review and update to the ZBL.



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In summary, we request consideration of the following:

1. To permit ARU's in townhouse and cluster townhouse dwellings.
2. To permit garden suites within existing or new Plans of VLC development.
3. To consider providing maximum lot coverage provisions specific to those uses permitted in each of the respective urban residential density zones.
4. To complete a review of provisions set out under Section 9.0 and undertake necessary revisions to ensure all permitted uses have been considered.
5. To review the maximum density provision set out under subsection 9.1.10 to consider more compact, higher density forms of development.
6. To provide clarity regarding how Plan of VLC Townhouse developments will be handled moving forward and consider maintaining townhouse dwelling as a permitted use in the UR3 zone.
7. Administratively re-zone lands identified in Appendix A to UR1 & UR3 to ensure conformity with adopted OPA No.59 and amend Key Map U-07 accordingly.

Your consideration to this request is appreciated.

Yours Truly,

Sifton Properties Limited

DocuSigned by:

Phillip Massschelein

Senior Vice President, Neighbourhood Developments

Attach. (if any)

Cc: Michael Di Lullo, CAO
Marion Cabral, Planner



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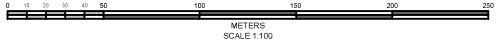
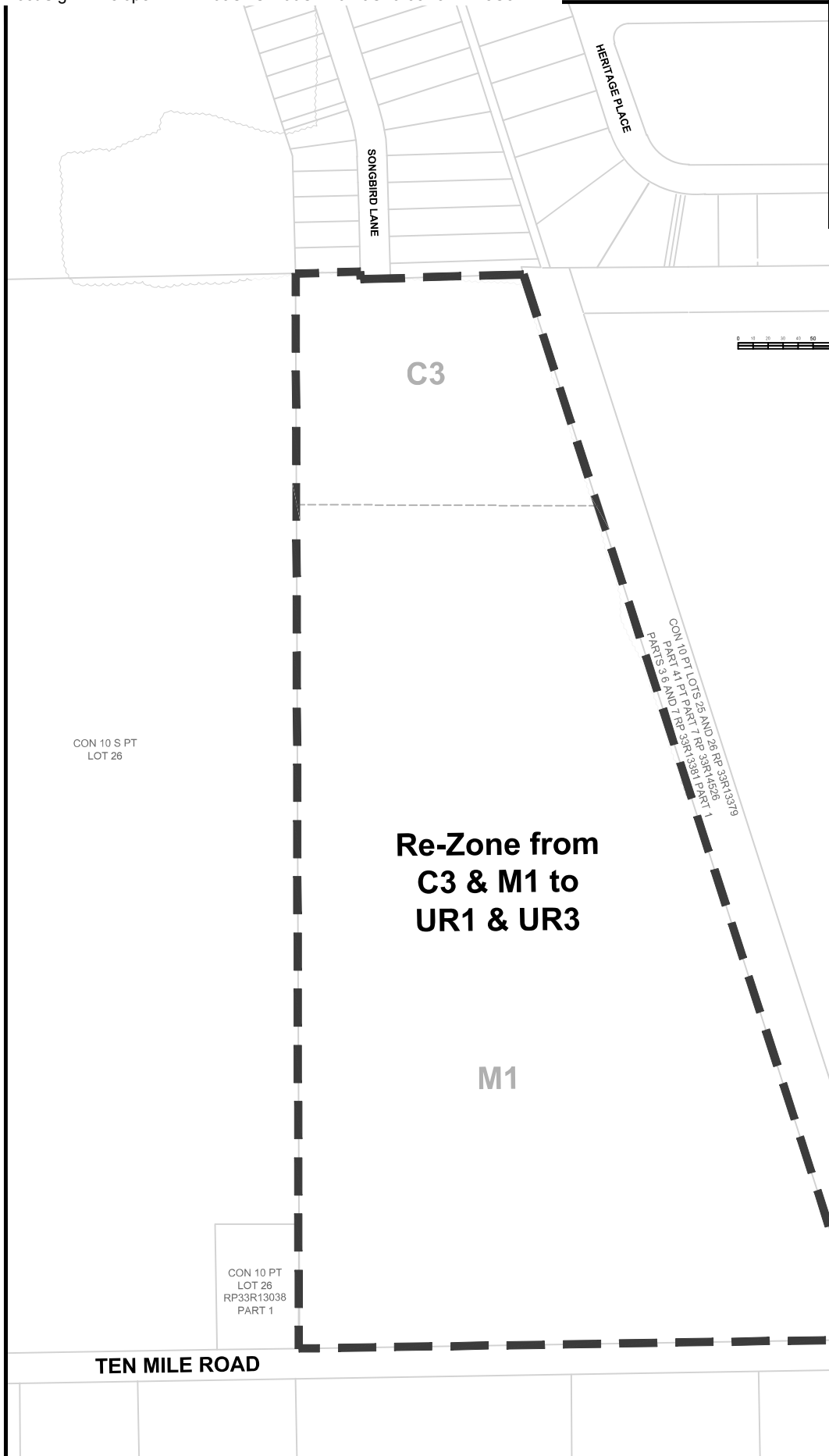
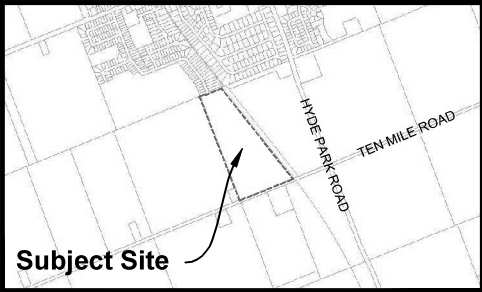
APPENDIX A



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LONDON CON 10
PT LOT 25 RP
33R17311 PART 1



SIFTON PROPERTIES LTD.
NEIGHBOURHOOD DEVELOPMENTS
1295 RIVERBEND SOUTH, SUITE 300
LONDON, ONTARIO
N6K 0G2

PROPOSED ZONING
TIMBERWALK, PHASE SIX
LONDON CON 10 PT LOT 25 RP
33R19510 PARTS 1 AND 2

Project No. :	--	Date:	10 April 2023
Drawing No. :	--	Scale:	1:100
Drawn By :	AL	<small>Notes:</small> 1. Map and Illustrations are for reference only. 2. Measurements and lot lines may change throughout the application process. 3. Street names may change.	
Checked By :	AH		