

To: Mayor and Members of Tillsonburg Council

From: Amy Hartley, Development Planner, Community Planning

Applications for Official Plan Amendment and Zone Change OP 25-20-7 and ZN 7-25-16 – 2455892 Ontario Inc.

REPORT HIGHLIGHTS

- The subject lands are proposed to be developed to accommodate the 24-unit stacked townhouse development. The applicant is requesting to amend the Official Plan designation to 'Medium Density Residential' to permit the proposed development.
- The zone change application proposes to rezone the subject lands from 'Low Density Residential Type 1 (R1)' to 'Special Medium Density Residential (RM-sp)' to permit 24 stacked townhouse units with a number of site-specific provisions to facilitate the development.
- Planning staff support the applications as they are generally consistent with the PPS direction and Official Plan policies respecting residential intensification, infill within established neighbourhoods, increased supply, and diversity of dwelling types and locational criteria respecting the designation of new medium density residential areas.

DISCUSSION

BACKGROUND

OWNERS: 2455892 Ontario Ltd. (c/o Abe Hiebert)
P.O. Box 174, Tillsonburg, ON N4G 4H5

AGENT: Zelinka Priamo Ltd. (c/o Caden McAllister)
318 Wellington Road, London, ON N6C 4P4

LOCATION:

The subject land is described as Part of Lot 5, RCP 1646, Part of Lot 52, Registered Plan 41M-88, Part Lot 6, Concession 12 (Dereham), municipally known as 155 Wilson Avenue. The lands front on the north side of Wilson Avenue and south side of Concession St W in the Town of Tillsonburg.

COUNTY OF OXFORD OFFICIAL PLAN:

Existing:

Schedule "T-1"	Town of Tillsonburg Land Use Plan	'Residential'
Schedule "T-2"	Town of Tillsonburg Residential Density Plan	'Low Density Residential'

Proposed:

Schedule "T-1"	Town of Tillsonburg Land Use Plan	'Residential'
Schedule "T-2"	Town of Tillsonburg Residential Density Plan	'Medium Residential Density'

TOWN OF TILLSONBURG ZONING BY-LAW 3295:

Existing Zoning:	'Low Density Residential Type 1 Zone (R1)'
Proposed Zoning:	'Special Medium Density Residential Zone (RM-sp)'

HISTORY OF THE SUBJECT LANDS

For Council's information, a number of planning applications have been previously submitted for the subject property. The following is a brief overview of the application history:

December 1985

Applications for Official Plan Amendment (10-65), Consent (B-163/85) and Zone Change (ZON 7-111) were submitted for the subject property and adjacent property to the west located at 65 Concession St W (at that time still joined as one property) to allow for the construction of a three storey, 23 unit apartment building on a 0.6 ha (1.49 ac) lot, with access onto Wilson Street. The applications for Official Plan Amendment, to designate the property 'Medium Density Residential', and Zone Change, from '(R1)' to '(R3)', were considered by Town Council on February 11th, 1986 and Oxford County Planning Committee on February 20, 1986. The application for zone change was denied by Town Council and, although recommended for approval by the County Planning Department and County Planning Committee, the Official Plan Amendment was denied by County Council at their meeting of February 26, 1986. The associated consent application was subsequently withdrawn by the owner.

August 1986

An application for consent (B-62/86) was considered by the Oxford County Land Division Committee for the subject property & adjacent property at 65 Concession St West at their meeting of August 21, 1986. The application proposed to sever a 0.76 ha (1.88 ac) property, containing no buildings or structures and retain a vacant 0.25 ha (0.62 ac) property, containing an existing dwelling (immediate lot to the west of the subject lands). The application was granted by the committee and the parcel was subsequently created.

August 1991

Two applications for consent (B-3/90 & B-20/90) were considered by the Oxford County Land Division Committee for the subject property at their meeting of August 15, 1991. The owners proposed to create two 710.7 m² (7,650.2 ft²) vacant residential lots fronting on Wilson Avenue and retain an approximately 0.6 ha (1.5 ac) lot containing no buildings or structures. The Oxford County Land Division approved application B-3/90 (westerly lot) and denied B-20/90 (easterly lot) stating that it was premature and might jeopardize future development of the lot to be retained. The applicant did not fulfil the required conditions of approval within the one year time frame and the approval lapsed.

April 1993

An application for consent (B-13/93) was considered by the County Land Division Committee at their meeting of April 7, 1993. Similar to the previously lapsed application B-3/90, this application proposed to sever a 696.8 m² (7,500.5 ft²) vacant residential lot fronting on Wilson Street and retain a 0.67 ha (1.67 ac) lot containing no buildings or structures (subject lands of the current application). The application was granted and the lot was subsequently created and a single detached dwelling constructed in 1999 (163 Wilson Street).

November 2002

A zone change application was submitted seeking to rezone the subject lands & adjacent parcel to the east at 65 Concession St W from 'R1' to 'R3-sp' to permit the development of a residential condominium consisting of 16 one storey cluster dwellings. Town Council considered the application on November 25, 2002 and deferred the application to allow the owner to submit a formal site plan application to address traffic, slope stability, servicing and site design issues. A formal site plan application was never submitted.

October 2013

In August 2013 four severance applications (B13-22-25-7) were submitted to create two vacant residential lots on the north side of Wilson Avenue, and to permit a lot addition to provide additional area for access to a vacant residential parcel (current subject property). The consent applications were approved by the Oxford County Land Division Committee on October 3, 2013. The owner satisfied the conditions of consent and the lots and lot additions were finalized.

August 2014

In August 2014 a zone change application (ZN 7-14-10) was submitted by the owner of the property to rezone the current subject property from 'R1' to 'R3-sp' to permit the development of 12 condominium townhouses, fronting on a private street. The application was circulated for comments, however a detailed site plan was not provided to determine zoning compliance and the file was closed in 2015 after the required information was not provided. The application did not proceed to a public meeting and was closed.

April 2019

In April 2019 a zone change application (ZN 7-19-06) was submitted by the owner of the property to rezone the subject lands from 'R1' to 'R3-sp' to permit the construction of 2 two-storey multiple unit dwellings, consisting of 28 apartment units.

The application was considered by Council in May of 2019 and the application was denied and no appeal was received.

PROPOSAL:

The current applications for Official Plan Amendment and Zone Change propose to redesignate the lands from Low Density Residential to Medium Density Residential, and to rezone the lands from 'Low Density Residential Type 1 (R1)' to 'Special Medium Density Residential (R3-sp) with site-specific provisions. The site-specific provisions that have been requested are as follows:

- Recognize the existing lot frontage of 10 m on Wilson Avenue;
- Provide for a minimum westerly interior side yard width of 3.3 m in lieu of the required 4.5 m.

The initial application included a request for parking relief. However, the current zoning standards of 1.25 spaces per dwelling unit for a multiple unit dwelling were recently amended and not reflected in the application that was received.

The proposed development will consist of 24 residential units contained within a 3.5 storey stacked townhouse development. The proposal will have access from the site onto Wilson Avenue via a 6.7 m (21.9 ft) wide driveway.

Surrounding land uses are predominantly low density residential consisting of single-detached dwellings, Westmount Park is located to the southwest, Tillsonburg Memorial Hospital is located to the east, Glendale Secondary School and Participark located to the north of the subject lands.

Plate 1, Location Map with Existing Zoning, indicates the location of the subject property and the existing zoning in the immediate vicinity.

Plate 2, Aerial Map (2025) with Existing Zoning, provides an aerial view of the subject lands and surrounding uses as existing in the Spring of 2025.

Plate 3, Applicant's Sketch, identifies the conceptual site plan of the development as provided by the applicant.

APPLICATION REVIEW

2024 PROVINCIAL PLANNING STATEMENT

The 2024 Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. Under Section 3 of the *Planning Act*, where a municipality is exercising its authority affecting a planning matter, such decisions, "shall be consistent with" all policy statements issued under the Act. The following outlines the key PPS policies that have been considered but is not intended to be an exhaustive list.

Section 2.2 of the PPS provides that 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 immediate area by:

- a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning

and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;

- b) permitting and facilitating:
 - 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
 - 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites 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
- d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Section 2.2.1- Housing provides that Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options, including affordable housing needs;
- b) permitting and facilitating:
 - 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including *additional needs housing* and needs arising from demographic changes and employment opportunities; and
 - 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.

Section 2.3.1 of the PPS indicates that settlement areas shall be the focus of growth and development and land use patterns within settlement areas shall be based on densities and a mix of land uses which;

- a) Efficiently use land and resources;
- b) Optimize existing and planned infrastructure and public service facilities;
- c) Support active transportation;
- d) Are transit-supportive as appropriate, and
- e) Are freight supportive.

Section 2.3.1.3 also directs that planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritize planning and investment in infrastructure and public service facilities.

OFFICIAL PLAN

Section 2.1.1 of the Official Plan provides that growth and development will be focused in settlement areas and their vitality and regeneration will be promoted. Development will be directed to settlements with centralized wastewater and water supply facilities to minimize risks of contamination to air, land, surface water and groundwater, to preserve agricultural land and to reduce the cost of public service facilities and infrastructure. Settlements will be required to develop with land use patterns and a mix of uses and densities that efficiently use land and resources, are appropriate for, and efficiently use, existing or planned infrastructure and public service facilities, support active transportation and minimize negative impacts to air quality and climate change and promote energy efficiency.

Intensification will be promoted in appropriate locations within settlements, particularly those served by centralized wastewater and water supply facilities and all forms of housing required to meet the social, health and well-being needs of current and future residents will be permitted and facilitated in appropriate locations throughout the County.

Section 8.2.2.2 – Tenure and Mix, provides that it is an objective of the Official Plan to provide a range of tenure forms throughout the Town, consistent with the demand, and to maintain an appropriate supply of affordable rental and ownership housing in the Town, while recognizing that housing needs to be suitably maintained and adequate for habitation. Town Council shall encourage the creation of housing opportunities that may result in a mix of tenure forms, such as ownership, rental and cooperative, throughout the Town. Such encouragement will include the provisions of opportunities for the development of a variety of housing forms and by permitting sensitive infilling and accessory apartments in built-up areas.

The subject lands are designated ‘Low Density Residential’, according to the Town of Tillsonburg Land Use Plan. The subject application proposes to redesignate the lands to facilitate medium density residential development.

Areas designated for Low Density Residential use are generally intended to provide a variety of low-rise, low-density housing forms including executive and smaller single detached dwellings, semi-detached and duplex dwellings, additional residential units and converted dwellings, street fronting townhouses and low rise apartments. In these Districts, it is intended that there will be a mixing and integration of different forms of housing to achieve a low overall density of use.

The maximum net residential density for an individual development in the Low Density Residential District is 30 units per hectare (12 units per acre) and no building shall exceed three storeys in height at street elevation.

Areas designated for Medium Density Residential uses are primarily developed or planned for low profile municipal unit development that exceed densities established for Low Density Residential Districts. These districts are intended to include townhouses, converted dwellings and apartment buildings. In these Districts, it is intended that there will be a mixing and integration of different forms of housing to achieve a medium overall density of use.

The maximum net residential density in the Medium Density Residential Districts is 62 units per hectare (25 units per acre) and no building shall exceed four storeys in height at street elevation. The proposed development, at 24 units, would have a net residential density of 41 units per hectare (17 units per acre).

Any further Medium Density Residential designations [beyond those currently in the Official Plan] will be consistent with the following location criteria:

- sites which abut arterial or collector roads or sites situated in a manner which prevents traffic movements from the site from flowing through any adjoining Low Density Residential Districts;
- sites which are close to community supportive facilities such as schools; shopping plazas, institutional, recreational and open space areas;
- sites which are adjacent to the Central Area, designated Shopping Centres and Service Commercial Areas, Community Facilities, High Density Residential Districts or developed Medium Density Residential Districts.

In addition to the requirement for compliance to the locational policies; when considering proposals to designate lands for medium density residential development, Town Council and County Council will be guided by the following:

- the size, configuration and topography of the site provides sufficient flexibility in site design to mitigate adverse effects on the amenities and character of any adjacent Low Density Residential area through adequate buffering and screening;
- the location of vehicular access points and the likely effects of traffic generated by the proposal on the public road system and surrounding properties relative to pedestrian and vehicular safety is acceptable;
- adequate hard service capacity including water distribution, sanitary and storm sewers, power and gas distribution facilities is available or will be available to accommodate the proposed development;
- adequate off-street parking and outdoor amenity areas can be provided;
- the availability of, and proximity to, existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development;
- the effect of the proposed development on environmental resources or the effect of environmental constraints on the proposed development will be addressed and mitigated as outlined in Section 3.2.

ZONING BY-LAW

The subject property is currently zoned 'Low Density Residential Type 1 Zone (R1)', according to the Town of Tillsonburg Zoning By-law. The R1 zone permits a single detached dwelling, ARU and accessory uses thereto.

The applicant is proposing to rezone the subject property to 'Special Medium Density Zone (RM-sp)' to facilitate the construction of a 3.5 storey stacked townhouse building, consisting of 24 units.

The proposal requires the relief detailed below:

- Recognize the existing lot frontage of 10 m (32.8 ft) on Wilson Avenue; and
- Reduce the required interior side yard width from 4.5 m (14.7 ft) to 3.3 m (10.8 ft).

Staff have identified that additional relief is required from Table 9.2 – RM Zone provisions to permit more than 8 dwelling units per building. It is noted that stacked townhouse buildings were not considered when the zoning provisions for multiple unit dwellings were drafted. A stacked townhouse development meets the definition of a multiple dwelling unit, however, more than eight dwelling units can be accommodated while meeting all other zoning provisions within the RM Zone.

The purpose of the minimum lot frontage provisions is to ensure that the subject lands have sufficient frontage on an open and maintained public street to provide adequate driveway widths and emergency access. In this instance, notwithstanding the 75 m of frontage that the subject lands appears to have on Concession Street West, there is a 0.3 m reserve (Part 3 of 41R-3452) that precludes direct access to Concession Street West. The purpose of the 0.3 m reserve is to restrict access due to poor sightlines.

The application submitted and the circulation of the application included a requested relief for the parking ratio. However, as of June 2025, Council approved an amendment to the Zoning By-law which reduced the parking ratio for multiple unit dwellings to 1.25. The requested relief submitted as part of the application is no longer required.

AGENCY COMMENTS

Town of Tillsonburg Engineering Department indicated no objections to the application but added that detailed stormwater design and calculations will need to be submitted at the time of Site Plan review.

Tillsonburg Hydro noted that a request for new electrical service will need to be requested through their office.

Long Point Region Conservation Authority (LPRCA) indicated that the slope stability assessment is satisfactory, and the building envelope and parking lot are sufficiently setback from surrounding natural hazards. A permit is required from LPRCA prior to any development within a regulated area.

County of Oxford Public Works noted the following with respect to servicing:

The Applicant should be aware that water servicing capacity within the Town of Tillsonburg is limited. At the time of this Official Plan amendment application there is sufficient water servicing capacity available for the proposed development and, with the approval of this development, the capacity within the Tillsonburg drinking water system would be fully allocated. Further, the applicant should be aware that the approval of this Official Plan Amendment does not constitute or imply the reservation or allocation of water servicing capacity. The commitment of water capacity for the proposed development will not be evaluated and confirmed until the time of Site Plan Application, in accordance with the County's Water and Wastewater Capacity Allocation Policy.

Southwestern Public Health provided comments relating to the Built Environment and Healthy Public Policy and are attached to the report hereto.

Canada Post indicated that the proposed development will be serviced by centralized mail delivery provided through Canada Post Community Mailboxes. The owner will be responsible for installing a mail panel and provide access to Canda Post.

PUBLIC CONSULTATION

Notice of complete application regarding this proposal was provided to the public and surrounding neighbours on January 20, 2026, and notice of public meeting was issued on April 13, 2026, in accordance with the requirements of the Planning Act. As of the date of writing this report, a number of comments have been received from the public and have been appended to this report.

A summary of the comments is below:

- Whether the driveway will provide for adequate access for fire and emergency vehicles;
- Access to fire hydrants in the nearby area;
- Compatibility with the surrounding low density neighbourhood;
- Reducing the interior side yard is not appropriate and reduces privacy;
- Parking overflow onto Wilson Avenue;
- Restricting parking on Wilson Avenue within the area near the proposed development;
- Concerns relating to yard maintenance, garbage storage and collection, safety of children;
- Privacy of the existing dwellings and yards;
- Number of parking spaces being proposed;
- Traffic concerns on Wilson Avenue;
- Effects on nearby parks and green space;
- Impacts on ownership of surrounding lands;
- Development is too large for the area;
- Strain on municipal infrastructure;
- Noise and pollution concerns;
- Destruction of natural habitats and risk to wildlife; and
- Impact to property values.

Additionally, the owner's agent held a public open house on November 5, 2025 prior to the submission of the applications to receive feedback.

Planning Analysis

Applications have been received to amend the Official Plan and the Town's Zoning By-law to facilitate the construction of a 3.5 storey stacked townhouse dwelling units containing 24 units. The applicant proposes to redesignate the subject lands from 'Low Density Residential' to 'Medium Density Residential' to permit increased residential density on the site.

Supporting Studies

Traffic Impact Study

A Traffic Impact Study (TIS), prepared by RC Spencer Associates Inc., was submitted in support of the applications. The TIS concluded that the proposed development will have a nominal impact on Wilson Avenue with approximately one additional vehicle every five to six minutes during the AM and PM peak hours. The generated trips from the site would result in approximately 10 trips during AM peak hour, and 12 trips during PM peak hour.

The TIS assessed the sightlines of the entrance to the development as well and noted that the sightlines for egress are clear for good decision-making. The sightlines were assessed in accordance with the Transportation Association of Canada (TAC) Geometric Design Guide for Canadian Roads (2017) and site visits to determine the engineer's opinion that there is sufficient sight distance for safe egress from the proposed site access.

Functional Servicing Report

A Functional Servicing Report and Stormwater Management Report was completed by GRIT Engineering. It was found that the proposed residential development can be serviced by the existing and proposed on site infrastructure. The Stormwater Management infrastructure will be constructed in accordance with the Town's Development Guidelines and Design Criteria, and appropriate erosion and sediment controls will be in place until construction is completed and the vegetation has stabilized with mature growth.

Slope Stability Assessment

A Slope Stability Assessment was required by LPRCA to be submitted due to the rear of the property containing a natural erosion hazard. The Slope Stability Assessment was prepared by EXP Services Inc.. The Assessment identified where the top of the slope and extent of the erosion hazard is located as well as determined the geotechnical viability of the construction. The Assessment determined where the building could be located so as to avoid the slope and erosion hazard as well as engineering requirements for the footings needed to support the proposed building.

Provincial Planning Statement (PPS) 2024

Planning staff are of the opinion that the subject proposal is consistent with the policies of the PPS as the development is considered to be an efficient use of land and municipal services within a fully serviced settlement area. The proposal will increase the housing supply to help address the full range of housing needs and will assist the Town with providing and building homes that respond to changing market needs and local demand, to support a diverse and growing population and workforce in the Town and broader region. The development is also consistent with Sections 2.1.4, and 2.2.1 of the PPS as it will permit and facilitate housing options required to meet the social, health, economic and well-being requirements for current and future residents, facilitate residential intensification, represents the development and introduction of new housing options within previously developed areas and redevelopment, which results in a net increase in residential units.

Official Plan

With respect to the proposed Official Plan amendment to provide increased residential density on the site, it is the opinion of Planning staff that the Official Plan criteria respecting the designation of additional Medium Density Residential areas have been satisfactorily addressed and are assessed below.

The Official Plan recognizes the importance of increasing the supply of housing through residential intensification. As noted, the proposed development will have a net residential density of 41 units per hectare (17 units per acre) which is appropriate for the Medium Density Residential designation which permits 62 units per hectare (25 units per acre). Additionally, the Medium Density Residential designation does not allow building more than four stories in height at street elevation, the proposed building at 3.5 stories meets this criterion.

The size of the subject site is adequate and of a sufficient size to accommodate the proposed medium density development. The subject lands are a total of 0.6 ha (1.47 ac) in size, are generally flat on the southern portion of the site and contain a significant slope at the northern portion of the site. The subject lands are in close proximity to existing residential development, Participark and Westmount Park, a TGO Transit stop is located at the Salvation Army Church on

Concession Street (approximate 7 minute walk) as well as being in proximity to the Central Area (20 minute walk) which would provide access to commercial shopping, recreation, and community facilities.

The design of the subject proposal has taken into consideration the surrounding low density neighbourhood to mitigate impacts. The design the site has positioned the building as far away from existing housing as possible, is buffered from the low density uses by the parking lot, fencing is proposed around the perimeter of the site with appropriate landscaping and tree plantings. As such, staff are satisfied that the proposed developable lands provide an adequate building envelope while respecting the slope hazards on the subject lands, transitioning to surrounding existing low-density development, and provide adequate access to amenities in the surrounding area.

While the subject lands do not provide direct access to an arterial road, Concession Street, an arterial road on the Transportation Network Plan (Schedule T-4), is within 270 m of the subject lands. As noted, the Traffic Impact Study assessed the proposed development traffic conditions and a nominal impact is anticipated on Wilson Street, no off-site roadway improvements were recommended, the required off-street parking can be accommodated, and the location of the site access from Wilson Avenue being a collector road on the Transportation Network Plan, is appropriate, and expected to accommodate the nominal generation of traffic on the neighbourhood roadway.

Town of Tillsonburg Zoning By-law

With respect to the proposed zoning amendment, the request to recognize the existing frontage of 10 m (32.8 ft) on Wilson Avenue will formalize the existing frontage for the site and recognize it through zoning provisions so that a building permit can be issued. The lands also would appear to have approximately 75 m (246 ft) of frontage on Concession Street West, however there is a 0.3 m reserve that is owned by the Town of Tillsonburg that restricts access to Concession Street West due to the topography of the site and the grade and poor sightlines of Concession Street. The frontage of 10 m (32.8 ft) is anticipated to be wide enough to accommodate the required 7.3 m (24 ft) aisle width for driveway access and be of a sufficient width to accommodate fire and emergency vehicles.

In the 'Medium Density Residential Zone (RM)' the required interior side yard width is 4.5 m (14.8 ft). The applicant is proposing an interior side yard width of 3.3 m (10.8 ft) on the westerly property line. The intent of the interior side yard width provisions is to ensure there is adequate space for access for maintenance purposes around the building as well as sufficient space for drainage between properties, as well as privacy between properties where a taller building is proposed. At 3.3 m (10.8 ft) staff are satisfied that there is sufficient space between the proposed building and the neighbour property line to provide for maintenance access and accommodate on-site drainage. Additionally, based on the architectural renderings provided by the applicant windows are only proposed on the lower and first floors of the proposed building which will mitigate privacy concerns as a result of the reduced interior side yard.

It is noted that the RM Zone permits 8 dwelling units per building for a multiple unit dwelling. When the Zoning By-law was initially drafted, stacked townhouse development were not considered as a type of building form. Based on the definition of multiple unit dwelling, a stacked townhouse development meets this definition, however, majority of the proposals have more than 8 dwelling units per building. As such, staff are recommending relief of this provision to facilitate the proposed development containing 24 dwelling units.

Conclusion

This office is of the opinion that the proposed amendment to the Official Plan to accommodate the proposed development of the subject lands generally conforms with the relevant policies of the Official Plan, and the proposed zoning by-law amendment is appropriate and can be given favourable consideration.

RECOMMENDATIONS

That the Council of the Town of Tillsonburg advise County Council that the Town supports the application to amend the Official Plan (File No. OP 25-20-7), submitted by the 2455892 Ontario Inc., for lands legally described as Part of Lot 5, RCP 1646, Part of Lot 52, Plan 41M-88, and Part of Lot 6, Concession 12 (Dereham), in the Town of Tillsonburg to redesignate the lands to Medium Density Residential to facilitate the development of a 3.5 storey, 24 unit stacked townhouse building on the subject lands;

That the Council of the Town of Tillsonburg approve in principle the zone change application (File No. ZN 7-25-16) submitted by the 2455892 Ontario Inc., for lands legally described as Part of Lot 5, RCP 1646, Part of Lot 52, Plan 41M-88, and Part of Lot 6, Concession 12 (Dereham), in the Town of Tillsonburg, to rezone the lands to 'Special Medium Density Residential Zone (RM-sp)' to facilitate a 3.5 storey 24 unit stacked townhouse building with site-specific provisions.

SIGNATURES

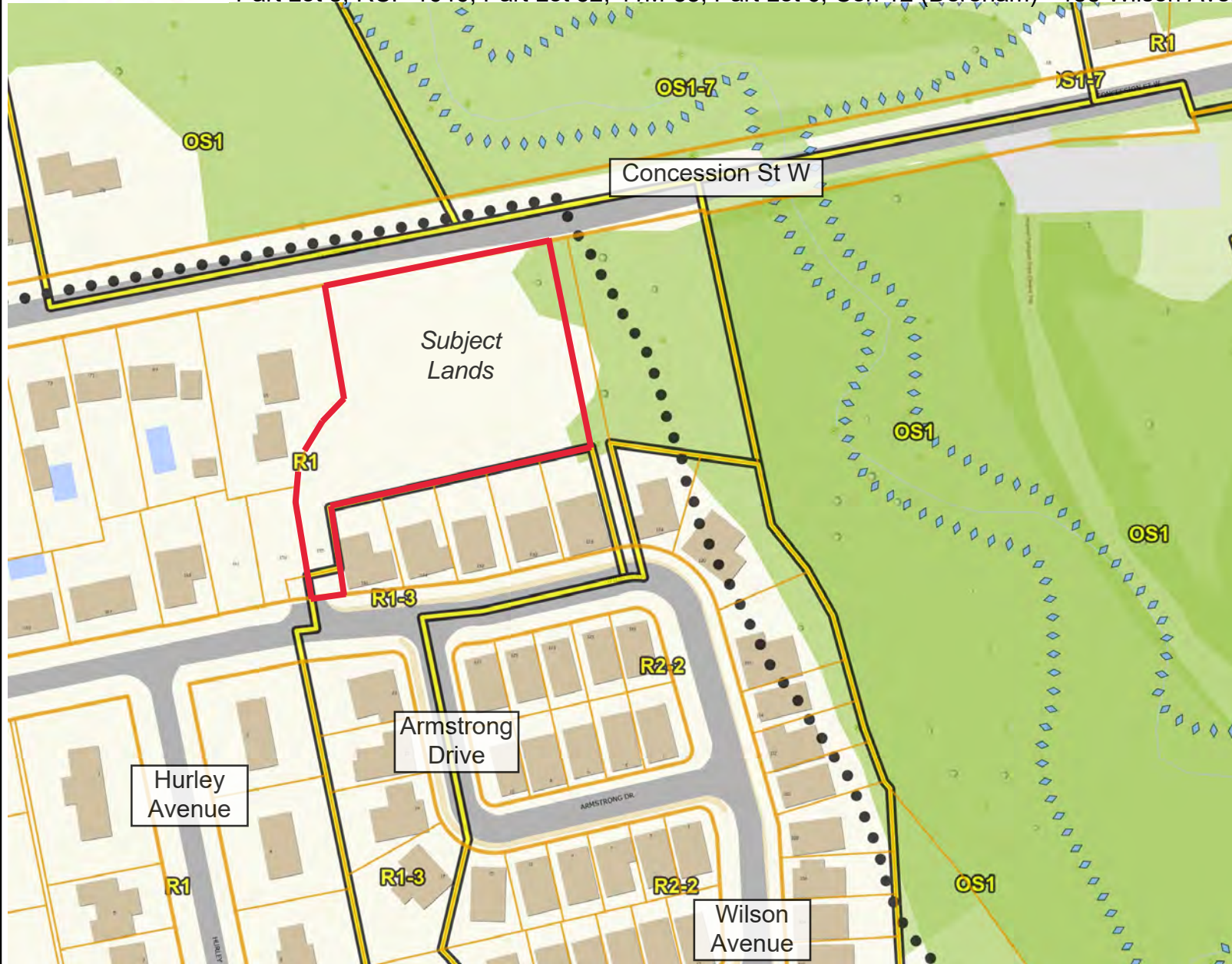
Authored by:

Original signed by

Amy Hartley
Development Planner

Approved for submission: *Original signed by*

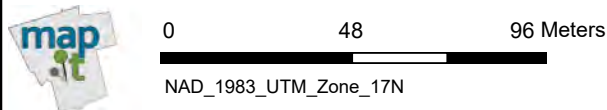
Eric Gilbert, MCIP, RPP
Manager of Development Planning



Legend

- Parcel Lines**
 - Municipal Boundary
 - Property Boundary
 - Assessment Boundary
 - Road
 - Unit
- Zoning Floodlines Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

January 16, 2026



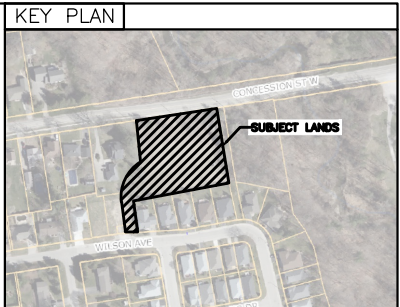
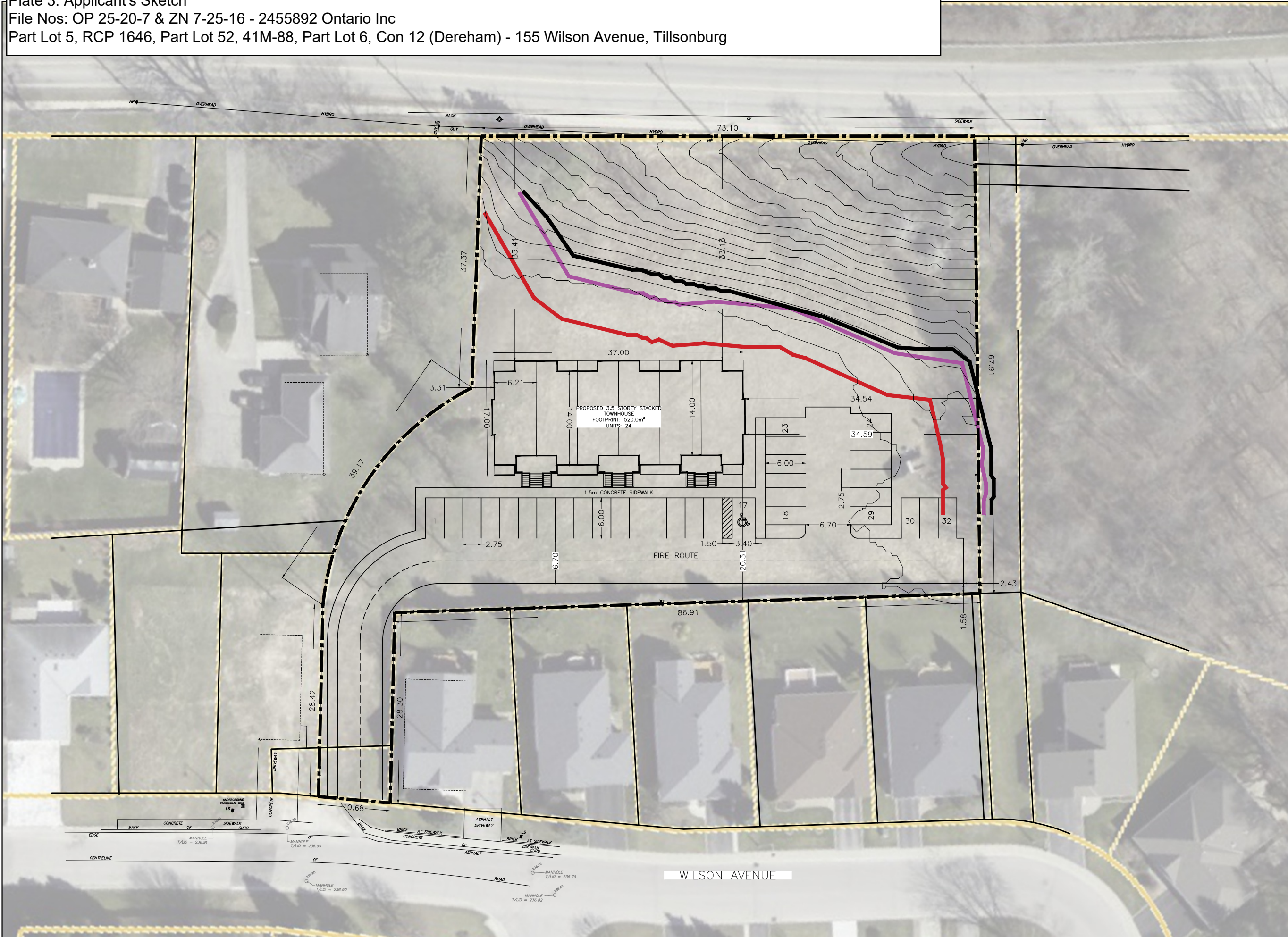
Legend

- Parcel Lines**
 - Municipal Boundary
 - Property Boundary
 - Assessment Boundary
 - Road
 - Unit
- Zoning Floodlines**
- Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



Plate 3: Applicant's Sketch
 File Nos: OP 25-20-7 & ZN 7-25-16 - 2455892 Ontario Inc
 Part Lot 5, RCP 1646, Part Lot 52, 41M-88, Part Lot 6, Con 12 (Dereham) - 155 Wilson Avenue, Tillsonburg



CONCEPT PLAN
 OF
 PART OF LOT 5, PLAN 1646
 PARTS 1 AND 3
 PART OF LOT 52
 TOWN OF TILLSONBURG
 OXFORD COUNTY

SITE STATISTICS
 EXISTING ZONE: R1
 PROPOSED ZONE: RM(L)

	REQUIRED	PROPOSED
LOT AREA (MIN)	160.0 m ²	5,968.8 m ²
PER UNIT	(2,560.0m ²)	
LOT FRONTAGE (MIN)	20.0 m	*10.68 m
LOT DEPTH	30.0 m	99.1 m
FRONT YARD SETBACK (MIN)	7.5 m	44.2 m
INT. SIDE YARD (E)(MIN)	4.5 m	34.5 m
INT. SIDE YARD (W)(MIN)	4.5 m	*3.3 m
REAR YARD SETBACK (MIN)	10.5 m	33.1 m
COVERAGE (MAX)	40%	9%
LANDSCAPED AREA (MIN)	30%	61%
HEIGHT (MAX)	15.0 m	<15.0 m
AMENITY AREA (MIN)	40.0 m ²	960.0 m ²
PER UNIT	(960.0 m ²)	
PARKING (MIN)	1.5 SPACE PER UNIT (36 REQUIRED)	*32

- *SITE-SPECIFIC SPECIAL PROVISION**
- APPROXIMATE EROSION HAZARD LIMIT
 - APPROXIMATE STABLE SLOPE ALLOWANCE
 - TOP OF SLOPE

NO.	REVISION	DATE	INITIAL


ABE HIEBERT
 155 WILSON AVENUE


Zelinka Priamo Ltd.
 LAND USE PLANNERS

318 Wellington Road, London, Ontario N6C 4P4
 Tel: (519) 474-7137 Fax: (519) 474-2284 email: zp@zplan.com

DRAWN BY CM	PROJECT NO. HBT/TLS/24-01
DATE APRIL 2026	SCALE 1:450



St. Thomas Site
Administrative Office
1230 Talbot Street
St. Thomas, ON
N5P 1G9

Woodstock Site
410 Buller Street
Woodstock, ON
N4S 4N2

January 23, 2026

Community Planning Office
Box 1614, 21 Reeve St.
Woodstock ON N4S 7Y3

Attention: Eric Gilbert

RE: Application for Official Plan Amendment & Zone Change -OP 25-20-7 & ZN 7-25-16
(2455892 Ontario Inc), 155 Wilson Avenue, Tillsonburg

This letter acknowledges receipt of the Application for Official Plan Amendment & Zone Change of January 16, 2026, with reference to the above premises/property. Public Health reviews these applications using the best available evidence regarding land use planning, zoning, and health protection.

A review of the application provides the following:

- () 1. The application contains information that Public Health is not able to comment on.
- (X) 2. Public Health has no objection to the content of the application as it currently stands.
- () 3. Public Health provides the attached letter for comments on the application.
- (X) 4. Built Environment and Healthy Public Policy provide the attached letter for comments on the application.

Please note that items marked with an "X" are applicable to this application as it currently stands. Should there be amendments to the application, please forward them to Public Health for further assessment.

Sincerely,

Stacy Hawkins
Public Health Inspector
Environmental Health

Robert Northcott
Health Promoter
Built Environment and Healthy Public Policy

Disclaimer:

These comments are provided by Southwestern Public Health (SWPH) at the request of the municipality with the decision-making power over this land use planning/zoning application. SWPH is not a decision maker on this application and its comments are made solely with regard to SWPH's role as a public body with an interest in the potential public health impacts of this application and for no other purpose.

January 22nd, 2026

Community Planning Office
Box, 1614, 21 Reeve Street
Woodstock, N4S 7Y3

**Re. Application for Official Plan Amendment and Zone Change – OP 25-20-7 & ZN 7-25-16
(2455892 Ontario Inc)**

Thank you for the opportunity to provide review and comments on these documents regarding the proposed development at 155 Wilson Avenue. Southwestern Public Health would like to express our support for this development.

Shelter is a topic of great concern for many Ontarians; there is a noted housing supply crisis and costs for shelter have been rapidly rising in recent years.¹ The additional 24 residential units provided by this development would be a welcome addition to the local housing supply. Additionally, it was noted that the proposed development would be providing a denser form of housing for the local community. Increased housing density can make more efficient use of municipal utilities and services.¹ Dense housing may also provide a wider range of price points for people who are seeking housing, which may help with affordability.

It was also positively noted that the proposed development is located in close proximity to a number of parks and green spaces. Access and use of green spaces by community members can be beneficial to their health, including reducing risk for diabetes, cardiovascular diseases, as well as respiratory diseases among adults.² Green spaces can also facilitate stress reduction, social cohesion, and physical activity for community members.³

An additional advantage of the chosen location for the proposed development is its proximity to community amenities, including commercial retail, schools, churches, and a local community centre. The close proximity of these amenities presents an opportunity to promote active transportation as a transit option that residents can use to meet many of their daily needs. The use of active transportation has a number of health benefits for communities, including reduced risk of chronic diseases and improved mental health among community members.⁴ We encourage the inclusion of active transportation supportive infrastructure (including sidewalks, multi-use paths, and bike lanes) when feasible in upcoming developments.

Thank you again for the opportunity to provide our input on these documents.

Sincerely,

Robert Northcott

References

1. Ontario Housing Affordability Task Force. Report of the Ontario Housing Affordability Task Force. [Online].; 2022 [cited 2026 January 20. Available from: <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.
2. Ige-Elegbede J, Pilkington P, Orme J, Williams B, Prestwood E, Black D, et al. Designing healthier neighbourhoods: a systematic review of the impact of the neighbourhood design on health and wellbeing. ; 2022.
3. Hartig, T.; Mitchell, R.; de Vries, S.; Frumkin, H. Nature and health. Annual Review of Public Health. 2014; 35, 207-28.
4. Tam T. The Chief Public Health Officer's Report on the State of Public Health in Canada 2017; Designing Healthy Living. Ottawa: Public Health Agency of Canada; 2017.

Amy Hartley

From: Roberta Brown [REDACTED]
Sent: Monday, February 9, 2026 12:33 AM
To: Planning
Subject: File No. OP 25-20-7, ZN 7-25-16

You don't often get email from [REDACTED]. [Learn why this is important](#)

Attn: Amy Hartley, Development Planner

I am writing as I have some concerns regarding the proposed build at 155 Wilson. I am one of the houses that backs onto the property.

1. Rezoning from 'low density' to 'medium density' allowing a 3.5 story townhouse would mean these townhouses will be looking down directly into our yard and deck area, thereby invading our privacy. We bought our home with good faith that nothing other than low density builds would be approved for this property.
2. 32 parking spaces for 24 units is not nearly enough. This means the overflow will spill directly onto Wilson Ave. We do not want an assortment of automobiles parking in front of our homes. As well with the curvature of Wilson Ave. and the cross streets it is also unsafe to have cars parked along the roadway.
3. The notice from Oxford County advised recognition of the 10M on Wilson Ave. Are they referring to the driveway area. What specifically is it being recognized for?
4. This will definitely add an increase to the already heavy traffic issue on Wilson Ave with an increase to volume, speed and noise pollution.
5. Has thought been given to the amount of room required should fire or ambulance need access to the units?
6. The plans shown to us by the designer had no area for garbage or recycling. Will garbage and/or recycling for 24 units be placed along Wilson Ave every week causing a tremendous eyesore on the neighborhood. And where would it be stored prior to pick up?
7. What affect will this build have on the Greenbelt/Participark and the park area?

It is my opinion that this type of build does not fit the subject lands or the surrounding area.

Please take these concerns into account when making your recommendation.

Sincerely,
Roberta Brown
[REDACTED]

Amy Hartley

From: Amy Hartley
Sent: Thursday, February 12, 2026 8:22 AM
To: Planning
Subject: FW: 155 WILSON AVENUE

-----Original Message-----

From: Pat Carlson [REDACTED]
Sent: Monday, February 9, 2026 1:59 PM
To: Amy Hartley <ahartley@oxfordcounty.ca>
Subject: 155 WILSON AVENUE

[You don't often get email from [REDACTED]. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Good afternoon. Amy.

I am a member of the Hickory Hills Residents Association serving on a committee with regards to the proposal for 55 Wilson Avenue. OP 25-20-7, ZN 7-25-16.

As a committee we are preparing a presentation to be brought to the Tillsonburg Town Council if it becomes necessary. Our Adult Lifestyle Community has been presented with a similar situation in recent years and our concerns remain the same.

Our question at this time is whether you have any idea as to when this issue might be sent to the Town Council and thus determine when it would be on their agenda. That would then provide us with the timeframe in which we would be working.

I took the advice from your voicemail message indicating an email would be the best option.

Should you need to reach me by telephone, my number is [REDACTED] or my cell [REDACTED]

Thank you on behalf of my community.

Regards

Mrs. Pat Carlson

Sent from my iPad.

31 January 2026

Dear Counsellor Kelly Spencer, Town of Tillsonburg: email: xxxxxx

& Amy Hartley, Oxford County: email: planning@oxfordcounty.ca

RE: Proposed Multi-Unit Residential Unit for 155 Wilson Avenue

We acknowledge receipt of the “Notice of Receipt of Complete Applications for Official Plan Amendment & Zone Change” dated January 20, 2026 will alter the Low Density Residential neighbourhood. It is our understanding that Municipalities manage community growth through official plans and bylaws. The random and numerous amendments will alter the Low Density Residential neighbourhood the plans and bylaws are meant to protect & sustain.

Why do you have to recognize the existing lot frontage of 10 meters on Wilson? Is the access onto Wilson 10 meters and does this frontage comply with all current regulations and will it be able to address the fact that the proposed Multiple unit development will require specific **street access** to ensure;

- (a) Safe access to and from Wilson Avenue;
- (b) Access to the development by emergency & utility vehicles;

It is our understanding that **Ontario fire lanes/routes** must provide an unobstructed width. The routes must support heavy fire vehicle loads and have a maximum 12 meter centre line radius for turns to ensure access to buildings. Parking must be prohibited on designated fire lanes whose widths must meet current regulations and fire hydrants shall be located within 45 meters of building complex.

- (c) Safe traffic control;
- (d) Safe pedestrian access. Is there enough frontage to provide 2 lanes of traffic and a sidewalk?

What is the reasoning & logic behind the reduction of interior side yard setbacks at the same time you are proposing to increase residential density.

1. **Zoning bylaws & Official Plans** are used to ensure compatibility with future development & to protect property values. Adding the proposed multi-unit building to an area zoned R1 in a section of the Town which is made up of blocks of low density residential (single family) homes will defeat the purpose of having an Official Plan and Zoning Bylaw; not to mention the proposal places a multi-story building (on a lot that is too small according to current regulations) beside an adult community made up of mostly retired individuals – which community has been supported by the Town since its inception. This will result in lifestyle conflicts.
2. **Setback bylaws** are used to ensure safety & privacy by providing space between homes. A multi-story complex will invade the privacy of the properties abutting the site in question.

What is the reasoning & logic behind the reduction of parking spaces from 1.5 spaces per unit to 1.3 spaces per unit.

The proposed **reduction of parking spots** will be inadequate and cause overflow parking on Wilson Avenue. Studies confirm that Rural Ontario households exhibit high vehicle ownership rates with approximately 72% of households owning 2 or more vehicles. This fact is driven by the necessity for transportation to work & shops beyond the Town. A Bradley Post Watson report presented to Tillsonburg confirmed a short fall of commercial lands to accommodate the EXISTING property base – thus further highlighting the need for 2 vehicles per household so residentials can drive to and from work. In addition to a number of units owning more than 1.3 vehicles, has consideration being given to parking space for occupants who entertain visitors?

Parking overflow on Wilson Avenue will be implemented by residents of proposed units if adequate parking spots are not provided on site. The Ontario Ministry of Transportation explicitly advises (and places onus on municipalities) to

- (a) Prohibit parking where there is no clear view for 125 meters in BOTH directions, as oncoming drivers may not see parked vehicles, resulting in more collisions (Wilson is a winding street);

- (b) Prohibit parking within 9 meters of intersections, including proposed property access lane; (access on Wilson is near Hurley & Armstrong intersections)
- (c) regulating parked vehicles so space limited by parked cars does not restrict flow to a single lane, making it difficult for 2-way traffic & emergency vehicles to pass; (Wilson is only designed for 2 lane traffic)
- (d) ensuring safety where parked vehicles make it dangerous for pedestrians to access cars or cross street;
- (e) prohibiting & regulating any vehicles parked on sidewalks;
- (f) monitor and penalize repeat offenders of all parking violations;
- (g) ensuring removal of snow is not impeded by parked vehicles.

When considering and accepting an application to amend the current Official Plan & Zone Bylaw to allow for a medium density residential complex on a lot not large enough to meet current regulations, consideration should also be given to:

- (a) Ontario Building Code and bylaws pertaining to **yard maintenance & storage units** and how these regulations will be monitored and enforced in connection with the proposed multi-unit site.
- (b) How will **garbage storage and collection** be addressed to ensure health and safety of community, especially given the fact that the accessible area of the lot is limited due to the sloped lands to the north.
- (c) If the complex is sold to families (parents & children), how will the **safety of children** playing outside be addressed, given the fact that the lands to the north fronting on Concession Street are sloped and the remaining area on top of the hill, after the completion of the complex and the installation of parking spaces, will further be limited, by the need for garbage bins and outside/yard storage sheds for each of the units.

With respect, we would suggest that the proposed multi-level complex be built in an area currently designed medium density residential.

Your kind response to our concerns will be greatly appreciated.

Sincerely,

Carol & Tim JUDD

[REDACTED]

Amy Hartley

From: Gary Paret [REDACTED]
Sent: Friday, January 23, 2026 12:17 PM
To: Planning
Subject: File Number: OP 25-20-7, NZ 7-25-16

Importance: High

You don't often get email from [REDACTED]. [Learn why this is important](#)

Good afternoon,

This letter is to acknowledge receipt of your Notice of Complete Application for 2455892 Ontario Inc.

We have serious concerns with respect to this application and require further information before it can be properly evaluated. We will be attending the public meeting and request to be notified of the meeting date as soon as it is scheduled.

We ultimately intend to construct a single-family dwelling on the property immediately east of the subject lands. The proposed development will negatively impact our property value and will materially affect the future use and development potential of our land.

We trust these concerns will be given due consideration.

Sincerely,

Gary

Gary R. Paret
[REDACTED]

[REDACTED]

TY,

[REDACTED]

"The information in this electronic mail message is the sender's confidential business and may be legally privileged. It is intended solely for the addressee(s). Access to this internet electronic mail message by anyone else is unauthorized. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it is prohibited and may be unlawful."

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Amy Hartley

From: Planning
Sent: Wednesday, April 22, 2026 12:03 PM
To: Amy Hartley
Subject: FW: 155 Wilson ave

ALYSA

From: Alycia Fyvie [REDACTED]
Sent: April 22, 2026 11:49 AM
To: Planning <planning@oxfordcounty.ca>
Subject: 155 Wilson ave

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi there. I just wanted to resend this email to be forwarded to Amy Hartley. I just wanted to ensure this email reached her before the public meeting. Thanks again.

FILES: OP 25-20-7 and ZN 7-25-16 (2455892 Ontario Inc)

Re: Official plan amendment and Zone change

Dear Sir/Madam,

I am writing to express my strong opposition to the proposed housing development in our neighborhood. While I understand the need for more housing in our town, I believe that this project would have a detrimental impact on our community. I live at 159 Wilson ave - I am directly beside the proposed road to enter this property. To be exact this road is beside my bedroom window.

First and foremost, the proposed development is simply too large for our area. The increase in population density would put a strain on our already overburdened infrastructure, leading to increased traffic congestion, noise pollution, and strain on our public services. Additionally, the construction of this project would result in significant environmental damage, destroying natural habitats and putting wildlife at risk. The increased traffic is a major concern on Wilson Ave. Wilson ave is a very quiet street with a speed limit of 40 km and home of Hickory Hills seniors area. With this development not having enough parking for its units - the overflow of cars will result in street parking which poses a safety risk. In addition the proposed roadway to enter the property from Wilson ave is very narrow and I am very concerned that emergency services (ie firetrucks) would not have the room on the roadway to access the property.

Furthermore, the type of housing being proposed is simply not in keeping with the character of our neighbourhood. It would also drastically alter the aesthetic of our area, replacing the existing greenery and open spaces with a monolithic, medium-density housing complex. These 3 and a half story buildings will also block the sunlight for me and the seniors in Hickory Hills. I am very concerned about the lack of privacy in our own backyards as these buildings will directly face our yards. I will without doubt be uncomfortable swimming in my backyard knowing many people in these buildings could simply look out there windows and have full view of my private backyard/pool.

Finally, I am deeply concerned about the impact this development would have on property values in the surrounding area. This proposed development will result in a decline in property values for neighbors, making it difficult for current residents to sell their homes and move elsewhere. Without a doubt my property value will decline with a roadway going past my bedroom windows and zero privacy in my backyard. Sadly I have heard residents in the area state if this proposal is successful they would move from the area and the fact that this is even a thought of residents makes it clear how unhappy we are with the thought of this development happening in our community.

In conclusion, I strongly urge you to reject this proposed plan amendment and zone change. While I recognize the need for housing, I believe that this project is simply not the right fit for our neighborhood. I will be attending the public meeting on April 27th and furthermore I would like to be notified of any decisions on this proposed amendment. Thank you for your attention to this matter. I appreciate you taking the time to hear my concerns.

Sincerely,

Alycia and Jesse Young

A black rectangular redaction box covering the signature area.

159 Wilson ave, Tillsonburg, ON, N4G4Z5

CONCESSION STREET WEST

WILSON AVENUE

Planning Justification Report

**155 Wilson Avenue
Tillsonburg, Ontario**

Abe Hiebert

December 2025



Zelinka Priamo Ltd.

LAND USE PLANNERS

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1.0 INTRODUCTION AND SUMMARY

On behalf of Abe Hiebert, Zelinka Priamo Ltd. is pleased to submit this report in support of applications to the Town of Tillsonburg and Oxford County to amend the County of Oxford Official Plan and the Town of Tillsonburg Zoning By-Law No. 3295 for the lands known municipally as 155 Wilson Avenue, hereinafter referred to as the 'subject lands'. The intent of the proposed applications is to re-designate and re-zone the subject lands to permit the development of a 3.5-storey stacked townhouse containing 24 residential units.

This Planning Justification Report will evaluate the proposed Official Plan Amendment and Zoning By-Law Amendment within the context of existing land use policies and regulations, including:

- The Provincial Planning Statement, 2024 (PPS);
- The County of Oxford Official Plan, 2023; and,
- The Town of Tillsonburg Zoning By-Law No. 3295.

Additional supporting documents for this application include:

- Site Plan and conceptual renderings;
- Building Elevations;
- Traffic Impact Assessment;
- Parking Supply Memo;
- Slope Hazard Assessment Report; and,
- Stage 1-2 Archaeology Assessment.

Additionally, a Neighbourhood Open House meeting was held on November 5th, 2025 at the Tillsonburg Community Centre to provide details of the proposal to the residents of the surrounding area.

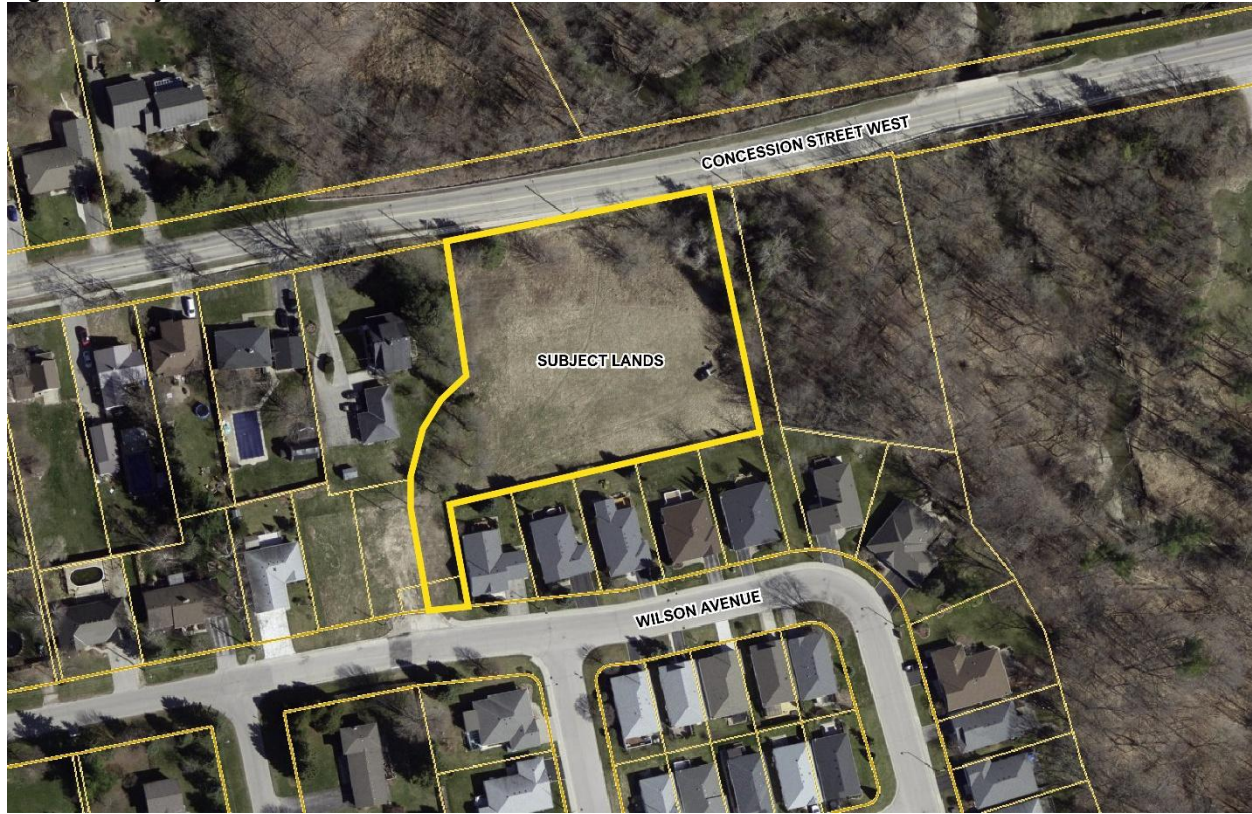
This report concludes that the proposed Official Plan Amendment and Zoning By-Law Amendment are desirable for the following reasons:

- The proposed Official Plan Amendment and Zoning By-Law Amendment are generally consistent with the policies of the Provincial Planning Statement, 2024;
- The proposed Official Plan Amendment and Zoning By-Law Amendment generally maintain the purpose and intent of the County of Oxford Official Plan and Town of Tillsonburg Zoning By-Law;
- The proposed Official Plan Amendment and Zoning By-Law Amendment will permit the appropriate use of underutilized lands, which will in turn benefit the surrounding area and Municipality as a whole;
- The development will provide additional lower-cost housing opportunities in an established residential area, making efficient use of existing infrastructure; and,
- While the development generate a minor increase in traffic, it is considered appropriate for, and compatible with the context of the surrounding area.

2.0 SUBJECT LANDS

The subject lands are located on the south side of Concession Street West and on the north side of Wilson Avenue (Figure 1).

Figure 1: Subject Lands – 155 Wilson Avenue



The irregularly-shaped subject lands have an area of approximately 5,969m², with approximately 10.7m of frontage along Wilson Avenue.

The vacant subject lands consist of mowed grass table lands and grassed slope with trees dispersed around the perimeter. The topography of the lands contains a large, flat area on the south side of the site ('table lands'), then a slope that descends towards Concession Street West as illustrated below in Figure 3. With the frontage along Wilson Avenue, this area provides for future vehicular access to the subject lands as there are no driveways to the site currently. Vehicular access from Concession Street West is not practical due to the slope on the north side of the subject lands. Pedestrian sidewalks are available along the south side of Concession Street West and the north side of Wilson Avenue.

The subject lands are designated "Low-Density Residential" on 'Schedule T-1 – Land Use Plan' and 'Schedule T-2 – Residential Density Plan' in the County of Oxford Official Plan. The subject lands are zoned "Low-Density Residential – Type 1 (R1)" in the Town of Tillsonburg Zoning By-Law No. 3295.

Figure 2 – View of into Subject Lands, looking south from Concession Street West



Figure 3 – View of Access Point into Subject Lands, looking north from Wilson Avenue



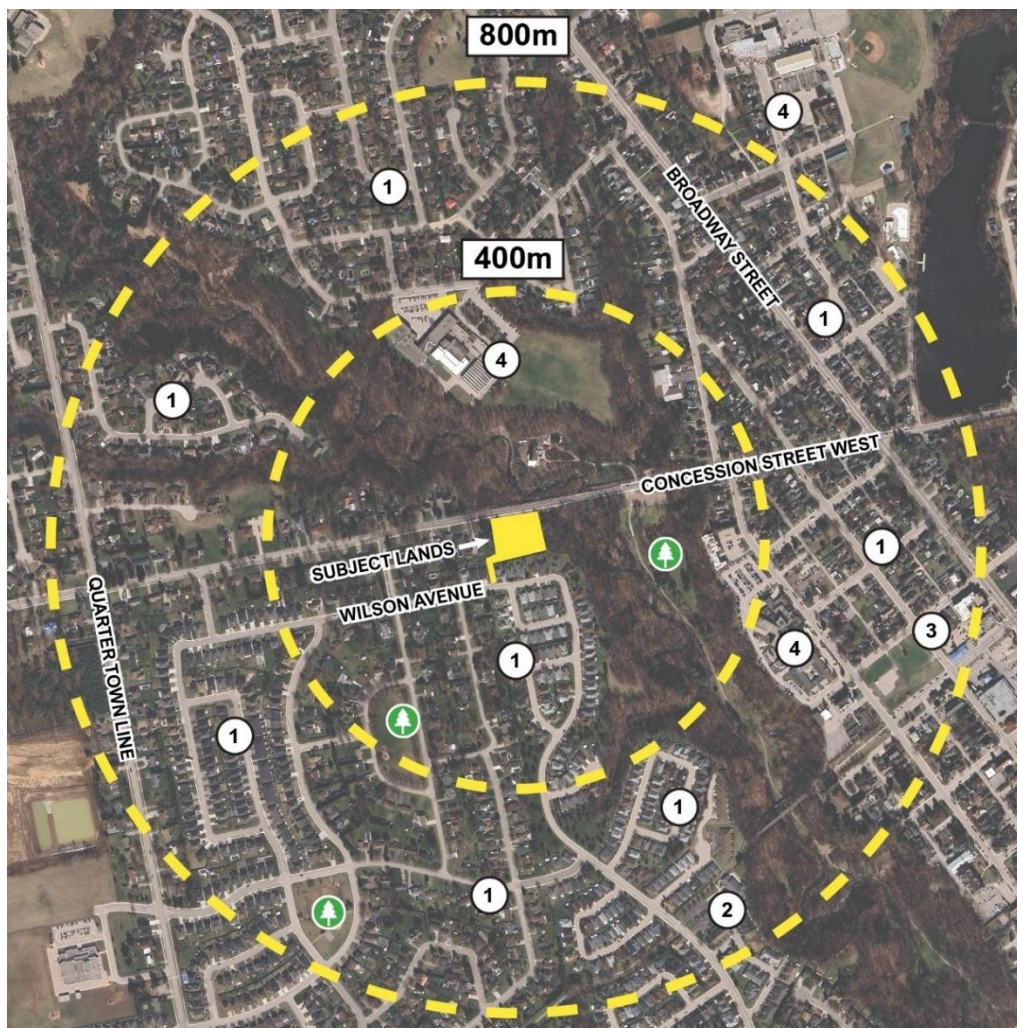
3.0 SPATIAL ANALYSIS AND NEIGHBOURHOOD CONTEXT

The neighbourhood that surrounds the subject lands consists of a range of low-medium density residential uses, commercial uses, institutional uses, and green space. Residential uses are provided in a variety of forms and densities ranging from single-detached dwellings up to street townhouses. Commercial uses are present in the wider vicinity in the form of retail shopping plazas containing a range of different stores and restaurants found along Broadway Street. Institutional uses are found in the forms of schools and churches.

3.1 REGIONAL SPATIAL ANALYSIS

Figure 4 illustrates significant landmarks. Each figure shows a 400m and 800m radius from the subject lands, representing straight line walking distances of approximately 5 minutes and 10 minutes respectively. However, due to sidewalk networks and physical barriers, the radii may not represent exact walking times. Significant landmarks are identified by numbers 1-5 on Figure 4.

Figure 4 – Regional Spatial Analysis (Notable Landmarks)



Lands within the 400m and 800m radii primarily consist of low-density residential land uses, with medium density residential land uses intermixed as well.

Notable features within the 400m and 800m radii include:

1. Existing low-density residential uses that consist of single-detached dwellings.
2. Medium-density residential uses in the form of semi-detached dwelling and street townhouses.
3. Commercial uses in the form of retail shopping plazas located along Broadway Street.
4. Institutional uses including Glendale High School, St. Mary's Roman Catholic Church, Tillsonburg District Memorial Hospital, and Tillsonburg Community Centre.
5. Parks/Open Spaces including Optimist Park, Memorial Park, Westmount Park, and Sanders Street Park

3.2 SITE-SPECIFIC SPATIAL ANALYSIS

Figure 5 illustrates a Site-Specific Spatial Analysis, providing information on the immediate context of the site and its interface with abutting lands. A small portion of the subject lands' front yard has an active frontage along Wilson Avenue, where the access to the subject lands can be located. The remainder of the front property line interfaces with the rear yard of properties which front onto Wilson Avenue; these lots contain exclusively single-detached dwellings. The west interior side yard interfaces with the side yard of an abutting property which contains a single-detached dwelling, The east interior side yard abuts a wooded area that is part of the Kinsmen Participark Trans Canada Trail. The rear yard of the property fronts onto Concession Street West, but due to the slope, development is not permitted in this area. With the subject lands abutting single-detached dwellings to the south and west, care will be required at these locations to ensure a compatible interface between existing and proposed uses. There may be opportunities to conserve vegetation and trees along the lot lines, and/or provide plantings in this location.

Figure 5 – Site-Specific Spatial Analysis



3.3 HOUSING FORMS AND ARCHITECTURAL STYLES

The most prevalent housing forms in the surrounding area are 1-2 storey single-detached dwellings that exhibit mid-century design and styles. Street townhouses are also common in this area, in an architectural style that is generally in-keeping with the single-detached dwellings in the area.

Mid-Century architectural styling is the most present architectural style that is found in the area surrounding the subject lands. These buildings feature architectural elements commonly identified with mid-century styling such as: gable, hip and pyramid hip roofing; garages built into the front or side elevation of the building; small, covered front porches; and, large bay windows on the main floor of the front elevation. Exterior building materials consist of brick, stone, vinyl siding, and roof shingles with a colour palette consisting of white, gray, black, red, yellow, and brown.

Figure 6 – Example of Single-Detached Dwelling located along Wilson Avenue



Townhouses in the surrounding neighbourhood are designed to look similar to the single-detached dwellings in the area by using the same rectangular form, and using the same contemporary architectural elements such as pyramid-hip roofing; garages built into the front elevation; and, covered front porches. These townhouses also utilize the same colours and materials as the single-detached dwellings in the area.

Figure 7 – Example of Townhouse Dwelling located at Balazs Court



4.0 PROPOSED DEVELOPMENT

The subject lands are proposed to be developed for a 3.5-storey stacked townhouse building containing 24 residential units with associated surface parking (Figure 8).

Figure 8 – Conceptual Development Plan



4.1 CONCEPTUAL DESIGN HISTORY

At the outset of the conceptual design stage for the development of the subject lands, a low-rise apartment building was proposed, built into the slope on the north side of the subject lands. Long Point Region Conservation Authority (LPRCA) staff requested a Slope Stability Assessment to review the slope characteristics of the subject lands. The Slope Stability Assessment was prepared by EXP Services, and concluded that an apartment building located on the north side of the subject lands, along the Concession Street West frontage, was supportable and could be implemented with minimal engineering modifications. However, despite demonstration of a stable slope, LPRCA did not agree with the notion of developing in this area, and require development be located well off the slope, being set back at least 6m from the identified top of slope. As a result, the proposed development is located on the table lands closer to Wilson Avenue.

4.2 SITE DESIGN

Given the development constraints noted above, the proposed building is setback from abutting properties and rights-of-way as follows:

- 44.2m from the front property line (Wilson Avenue)
- 34.5m from the east property line
- 3.3m from the west property line
- 33.1m from the north property line (Concession Street West)
- 20.3m from the residential properties abutting the subject lands to the south

Vehicular access to the subject lands is proposed from Wilson Avenue at the south end of the subject lands as there are no other feasible access options. The driveway leads to surface parking located in front of and to the east of the proposed townhouse building. A total of 32 parking spaces are provided for the development, providing a parking rate of 1.3 spaces per unit. The Town of Tillsonburg requires a minimum parking rate of 1.5 spaces per unit for multi-unit developments such as the proposed stacked townhouse building. In order to support the proposed parking rate, a justification memo was prepared by RC Spencer Associates Inc. RC Spencer utilized the latest ITE Parking Generation Manual (6th Edition) which found that low-rise multi-family housing with 2+ bedrooms provides a peak parking demand of 1.27 spaces for every two-bedroom unit. This average rate suggests that a minimum of 31 parking spaces will be sufficient for the proposed development.

Pedestrian access to the subject lands is provided by a concrete sidewalk located along the west side of the proposed driveway. While a detailed landscape plan is not yet available, it is anticipated that landscaping will be utilized around the building and parking areas to provide screening to abutting residential properties. Notably, the area between the drive aisle and southerly lot line, abutting the single detached dwellings fronting onto Wilson Avenue, is anticipated to accommodate tree species with significant vertical growth, such as Columnar English Oak and/or Green Giant Arborvitae in order to provide year-round visual screening. As the remainder of the subject lands is the sloped area where development is not feasible, this area will be utilized for outdoor amenity space and landscaping.

4.3 BUILT FORM, MASSING, AND ARTICULATION

The proposed 3.5-storey stacked townhouse building will have a modern and contemporary appearance, providing well-defined, high-quality facades along all elevations (Figures 9-12), including those elevations facing the interior of the site. Figures 13-17 provide conceptual renderings/visualizations of the proposed development and how it will look within the context of the existing neighbourhood.

Figure 9 – South (Front) Elevation of the Proposed Building



Figure 10 – North (Rear) Elevation of the Proposed Building



Figure 11 – East Elevation of the Proposed Building

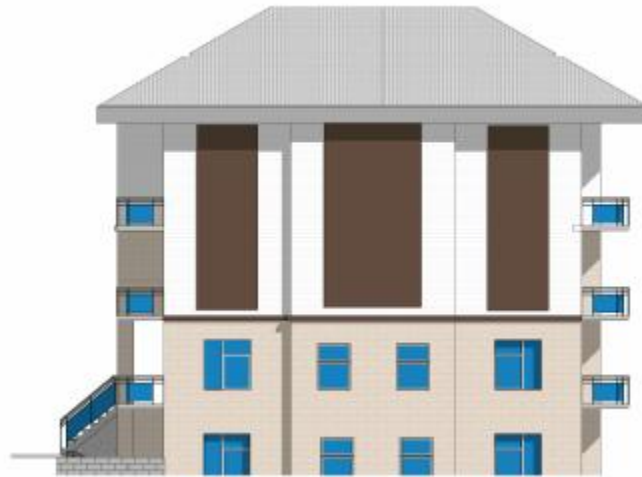


Figure 12 – Conceptual View of the proposed stacked townhouse building



Figure 13 – View in-site of the proposed development from the southwest corner of the proposed building



Figure 14 – View in-site of the proposed development from the southeast corner of the proposed building



Figure 15 – Aerial view of the proposed development looking east into the subject lands



Figure 16 – Aerial view of proposed development from the access point onto Wilson Avenue



Figure 17 – Conceptual View of the proposed development from Wilson Avenue



The proposed height of approximately 12.4m (3.5-storey) is taller than the 1-2 storey single-detached dwelling present in the surrounding area. The proposed intersecting hip roof design limits perceptions of height while conforming with the established residential character of the area.

The conceptual cladding strategy features stone/brick veneer on the lower portion of the building with a mixture of vinyl siding and concrete on the upper portion of the building. Glass and a variety of accent materials are provided throughout to highlight elements such as corners, openings, and balconies. These architectural features provide an attractive development that is distinct, yet compatible with the character of the surrounding neighbourhood.

Sufficient setbacks from property lines, combined with the ability to implement robust landscaping, are provided to accommodate privacy considerations.

4.4 SERVICING

A Preliminary Functional Servicing Report and Stormwater Management Report for the proposed development has been prepared by GRIT Engineering. The findings of their reports are as follows:

“The proposed residential development can be serviced by the existing and proposed on-site infrastructure. The design and calculations in Sections 2 and 4 and the appendices of this report demonstrate compliance with the Approving Agency’s design requirements and establish that the proposed development can be adequately serviced through new and existing connections to the existing municipal infrastructure.”

4.5 TRAFFIC

A Traffic Impact Study was prepared by RC Spencer Associates Inc. to investigate the potential traffic impacts the proposed development could have on the surrounding area. In the report prepared by RC Spencer Associates Inc., the findings of the report concluded that:

“the addition of site generated traffic will have a nominal impact on Wilson Avenue (approximately one additional vehicle every five to six minutes in the respective AM and PM peak hours). Sightlines for egress are clear for good decision-making. Therefore, based on the results of the technical work, it is the engineers’ opinion that the proposed residential development will not adversely impact area traffic operations.”

4.6 PARKING

In order to support the proposed parking rate of 1.3 parking spaces per unit (whereas a minimum of 1.5 spaces per unit is required as per the Town of Tillsonburg Zoning By-Law), a justification memo was prepared by RC Spencer Associates Inc. RC Spencer utilized the latest ITE Parking Generation Manual (6th Edition) which found that low-rise multi-family housing with 2+ bedrooms provides a peak parking demand of 1.27 spaces for every two-bedroom unit. This average rate concludes that a minimum of 31 parking spaces will be sufficient for the proposed development and that the proposed 32 surface parking spaces will sufficiently accommodate peak parking demands generated by the proposed development.

4.7 ARCHAEOLOGICAL ASSESSMENT

A Stage 1-2 Archaeological Assessment was prepared by Earthworks Archaeological Services Inc. to investigate the archaeological potential for the subject lands. In the report prepared by Earthworks Archaeological Services Inc., the findings of the report concluded that:

“based on the results of the Stage 1 background investigation and the subsequent Stage 2 test pit survey, the study area is considered to be free of archaeological material, and no additional archaeological assessments are required.”

5.0 POTENTIAL IMPACTS TO ABUTTING AND NEARBY LANDS

The development of the subject lands for a 3.5-storey, 24 unit, stacked townhouse building will be noticeable to residents in the neighbourhood. Impacts to abutting and adjacent properties may consist of:

Visual: Abutting residents and residents near the subject lands will see some of the townhouse building from their properties. The townhouse building’s presence will be noticeable; however, landscaping and tree plantings will serve to aid in visual screening through growth over time.

Auditory: Sound, from such sources as vehicles, conversations, children, and normal residential activities will be audible to abutting residents. Auditory impacts will be minimized through building setbacks, landscaping and tree planting, and fencing.

Light: Light from night-time lighting of the building may be noticeable to abutting properties; however, this is limited by the site design, and can be further mitigated by sensitive landscaping and fencing. A photometric and lighting plan will be required through the Site Plan Approval Process.

Traffic: As identified in the Traffic Impact Study, there will be a nominal increase in area traffic volumes.

Impacts to the broader community, even to properties close by but do not abut the subject lands, will be much less evident. Such impacts will generally be limited to seeing the development from the public realm, and a minor increase to traffic along Wilson Avenue.

6.0 PROPOSED PLANNING ACT APPLICATIONS

6.1 OFFICIAL PLAN AMENDMENT

The subject lands are designated “*Low-Density Residential*” on ‘Schedule T-1 – Land Use Plan’ and ‘Schedule T-2 – Residential Density Plan’ in the County of Oxford Official Plan. As the maximum density for this designation is 30 units per hectare (UPH), and the proposed density is 41 UPH, an Official Plan Amendment will be required to re-designate the subject lands to a “*Medium-Density Residential*” land use designation where up to 62 UPH is permitted.

6.2 ZONING BY-LAW AMENDMENT

The subject lands are zoned “*Low-Density Residential – Type 1 (R1)*” in the Town of Tillsonburg Zoning By-Law No. 3295.

As the R1 zone only permits single-detached dwellings, a Zoning By-Law Amendment will be required to re-zone the subject lands to a site-specific, special provision “*Medium-Density Residential (RM(_))*” zone to permit the proposed 3.5-storey stacked townhouse building. Requested special provisions for the zoning are as follows:

- Minimum lot frontage of 10m (this provision is reflective of an existing condition of the site);
- Minimum west interior side yard setback of 3.3m; and,
- Minimum parking supply of 1.3 spaces per unit.

Additional special regulations may be identified through the planning process.

7.0 PLANNING POLICY ANALYSIS

The following section of this Planning Justification Report provides analysis evaluating the proposed Official Plan Amendment and Zoning By-Law Amendment through applicable land use policies and regulations, including the following policy documents:

- 2024 Provincial Planning Statement (PPS);
- The County of Oxford Official Plan, 2023; and,
- The Town of Tillsonburg Zoning By-Law No. 3295

7.1 PROVINCIAL PLANNING STATEMENT, 2024

The Provincial Planning Statement (PPS), issued under the authority of Section 3 of the Planning Act “provides policy direction on matters of provincial interest related to land use planning” in order to ensure efficient development and the protection of resources. All planning applications, including Official Plan Amendment and Zoning By-Law Amendment applications, are required to be consistent with these policies. Generally, policies contained in the PPS are broad, high-level policies which do not address site-specific matters such as building design and specific building location. Such aspects are addressed through the County of Oxford Official Plan (Section 7.2) and the Town of Tillsonburg Zoning By-Law (Section 7.3). The proposed development, and associated Official Plan and Zoning By-Law Amendments, are consistent with the 2024 PPS as follows:

Provincial Planning Statement (2024) Policy Analysis Table	
<i>Policy</i>	<i>Response</i>
<p>Section 2.1 Planning for People and Homes</p> <p>6. Planning authorities should support the achievement of complete communities by:</p> <p>a) Accommodating an appropriate range and mix of land uses, housing options, transportation options with multi-modal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs.</p> <p>b) Improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their participation in society; and,</p> <p>c) Improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.</p>	<p>The proposed stacked townhouse development provides an efficient and appropriate form of intensification for the subject lands which will help the Town of Tillsonburg provide for a wider range of housing options in the community promoting accessibility and affordability.</p>
<p>Section 2.2 Housing</p> <p>1. Planning authorities shall provide for an appropriate range and mix of housing</p>	<p>The proposed development is an efficient and, as discussed later in this report, appropriate form of development for the subject lands, and will add to</p>

<p>options and densities to meet projected needs of current and future residents of the regional market area by:</p> <p>a) Establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households, and coordinating land use planning and planning for housing with service managers to address the full range of housing options including affordable housing needs;</p>	<p>the range and mix of residential uses to help satisfy the long-term housing needs identified in Oxford County/Town of Tillsonburg.</p>
<p>b) Permitting and facilitating:</p> <ol style="list-style-type: none"> 1. All housing options required to meet the social, health, economic and well-being requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and, 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. 	<p>The proposed development makes efficient use of underutilized lands by providing 24 new residential units on lands that are currently vacant. Through the development of this site for the 3.5-storey stacked townhouse dwelling, this development will provide more housing options within a developed area in the Town of Tillsonburg providing current and future residents additional housing options promoting access and affordability.</p>
<p>c) Promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation.</p>	<p>The proposed development provides residential intensification at a rate of 41 units per hectare (24 proposed units), which will make more efficient use of the subject lands and existing services compared to the lands in their current form (vacant). The location of the proposed development also supports active transportation as Section 3.1 illustrated that there are numerous amenities within walking distance of the subject lands.</p>
<p>d) Requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.</p>	<p>The proposed development is located within close proximity/walking distance to Bus Stop #22 (Concession Street West) promoting transit-supportive intensification in the Town of Tillsonburg.</p>
<p>2.3.1 General Policies for Settlement Areas</p> <ol style="list-style-type: none"> 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 major transit station areas. 	<p>As shown on Schedule 'C-3' in the Oxford County Official Plan, the subject lands are identified as being with a <i>Large Urban Centres/Settlement Area</i>.</p>

<p>2. Land use patterns within settlement areas should be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> a) Efficiently use land and resources; b) Optimize existing and planned infrastructure and public service facilities; c) Support active transportation 	<p>The proposed development will make efficient use of the subject lands by providing residential development on lands that are vacant and underutilized in their current form. The proposed development will also optimize existing infrastructure and utilize existing sidewalk networks to support active transportation.</p>
<p>3. Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.</p>	<p>The proposed development broadens the range of residential forms and intensities in the immediate area, and compliments the range and intensities of uses in the greater surrounding area. It makes efficient use of underutilized land, resources, infrastructure, and transportation networks by increasing the density (UPH) on the subject lands.</p>
<p>3.6 Sewage, Water, and Stormwater</p> <p>2. Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.</p>	<p>As outlined in the Stormwater Management Report and Functional Servicing Report prepared by GRIT Engineering, the proposed development can make use of existing municipal infrastructure to service the proposed development.</p>
<p>4.6 Cultural Heritage and Archaeology</p> <p>2. Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.</p>	<p>As outlined in Section 4.6 of this report, a Stage 1-2 Archaeological Assessment was conducted on the subject lands, which found that the subject lands did not contain any archaeological material.</p>
<p>5.1 General Policies for Natural and Human-Made Hazards</p> <p>1. Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.</p>	<p>Due to concerns with the sloping at the north end of the site, a slope stability analysis was prepared by EXP which outlines the extent of the erosion hazard due to the slope and setbacks that ensure safe development of the subject lands.</p>
<p>5.2 Natural Hazards</p> <p>2. Development shall generally be directed to areas outside of:</p> <ul style="list-style-type: none"> a) Hazardous lands adjacent to shorelines of the Great Lakes – St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards; 	<p>As outlined above, the proposed development has been located to be outside of the erosion hazard setback limit to ensure the safe development/construction of the subject lands.</p>

<ul style="list-style-type: none"> b) Hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and, c) Hazardous sites. 	
<p>3. Development and site alteration shall not be permitted within:</p> <ul style="list-style-type: none"> a) The dynamic beach hazard; b) Defined portions of the flooding hazard along connecting channels (the St. Marys, St. Clair, Detroit, Niagara, and St. Lawrence Rivers); c) Areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards, and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and natural hazard; and, d) A floodway regardless of whether the area of inundation contains high points of land not subject to flooding. 	<p>The subject lands are not located within a dynamic beach hazard area, and as illustrated on Schedule 'T-1' of the Oxford County Official Plan, the subject lands are located outside of the Floodline.</p>

Given the above, the proposed development, as well as the associated Official Plan Amendment and Zoning By-Law Amendment applications, are generally consistent with the policies of the 2024 Provincial Planning Statement.

7.2 THE COUNTY OF OXFORD OFFICIAL PLAN

The Oxford County Official Plan is a policy document that establishes the overall land use strategy for both the County and the eight area municipalities that comprise the County. The policies and land use schedules contained in the Official Plan establish locational and development review requirements for various land uses including residential land uses.

In the Oxford County Official Plan, the subject lands are designated “*Low-Density Residential*” on ‘Schedule T-1 – Land Use Plan’ (Figure 18) and ‘Schedule T-2 – Residential Density Plan’ (Figure 19) in the County of Oxford Official Plan.

Figure 18 – Schedule T-1 – Land Use Plan (excerpt from Oxford County Official Plan)

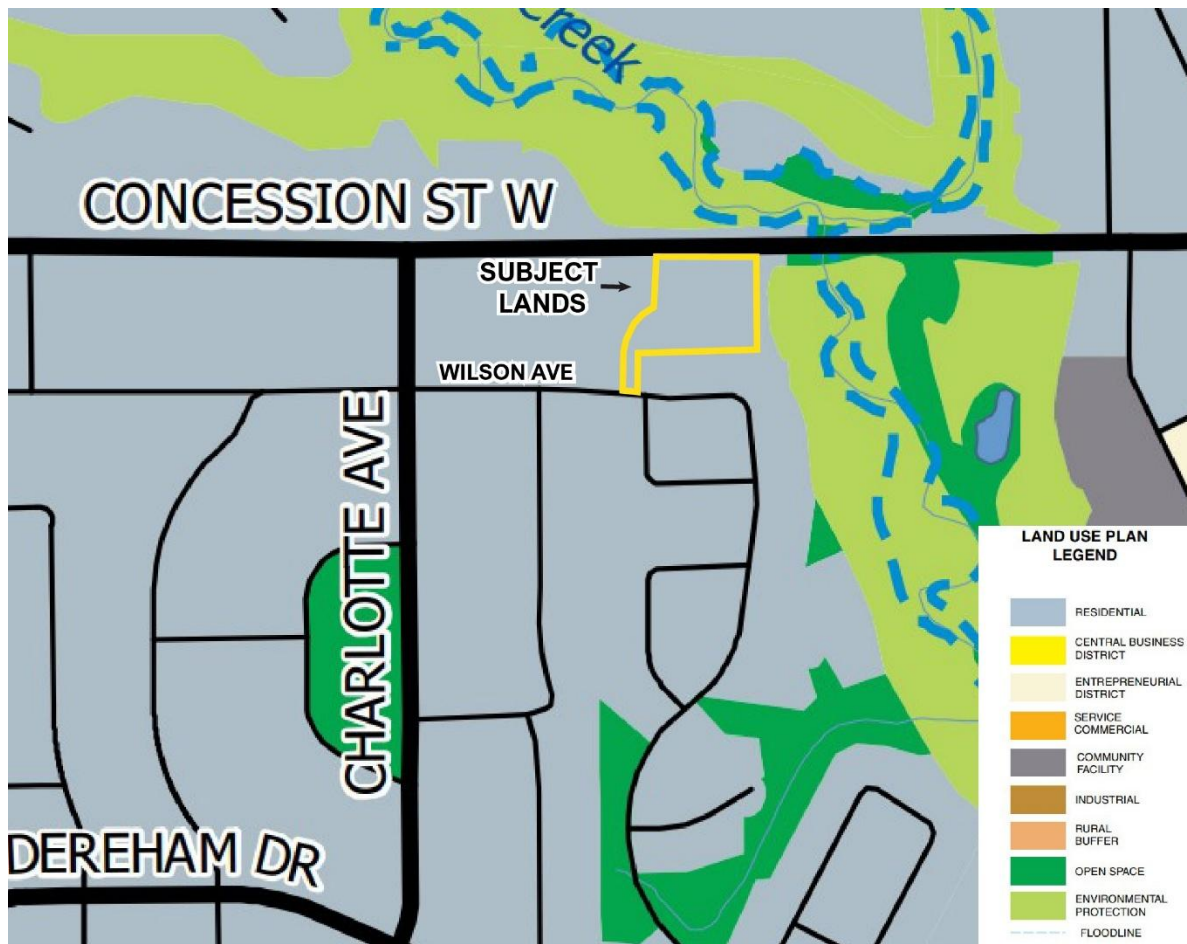
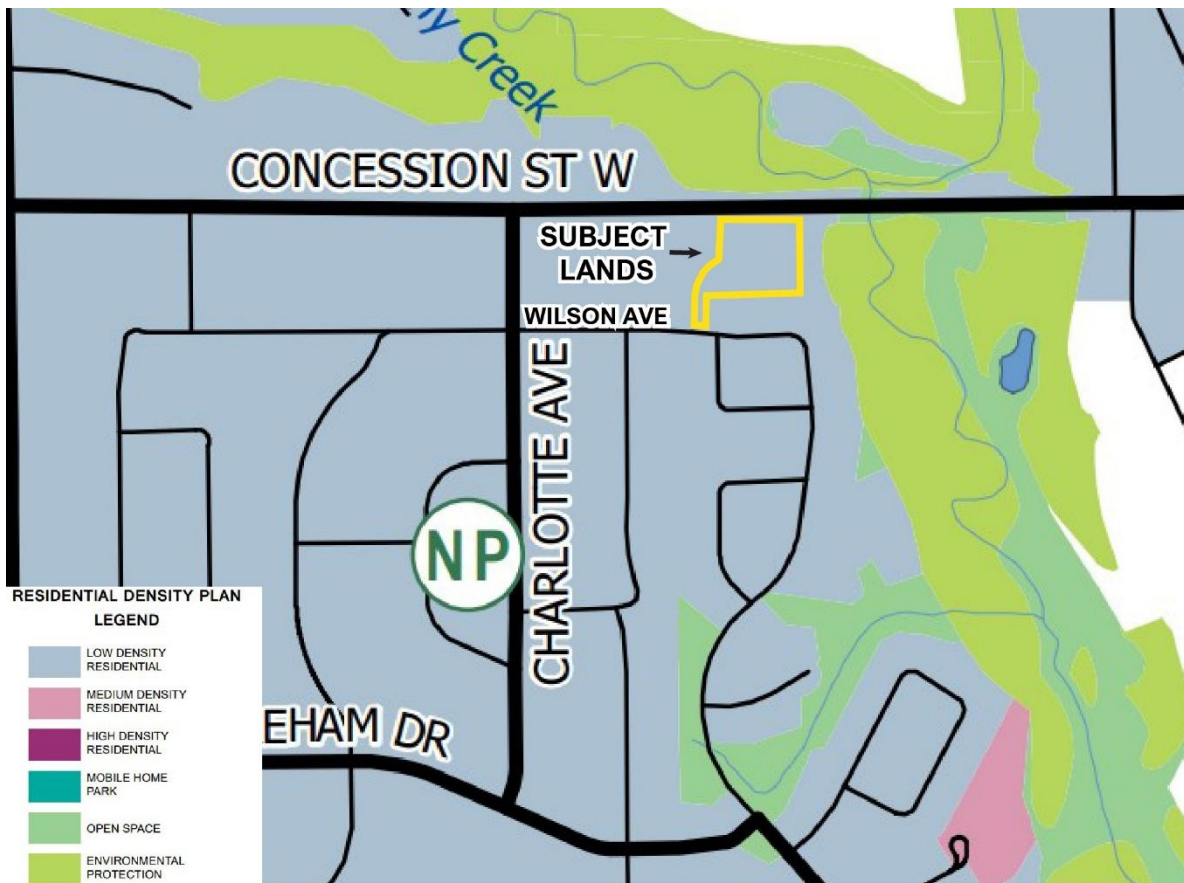


Figure 19 – Schedule T-2 – Residential Density Plan (excerpt from Oxford County Official Plan)



As set out in Policy 8.2.4, residential uses permitted in Low-Density Residential Areas include single-detached dwellings; semi-detached dwellings; duplexes; converted dwellings; quadraplexes; townhouses; and, low-density cluster developments. For these residential uses, minimum and maximum residential density targets 15 and 30 UPH, respectively.

When analyzing the proposed development against the current Official Plan designation of the subject lands, the proposed building form (townhouse) is permitted, however, the proposed development has a residential density of 41 units per hectare, exceeding the maximum density allowed in Low-Density Residential Areas. Therefore, an Official Plan Amendment is required to re-designate the subject lands to a *Medium-Density Residential Area* to permit the proposed development. The Medium Density Residential Area designation permits densities between 31 and 62 UPH.

Further to above, the transition from low-density to medium-density residential on the subject lands is appropriate for the subject lands as the location of the subject lands being on the exterior of an existing neighbourhood, with frontage along a higher-order road (being Concession Street West), are an excellent location for medium-density residential intensification, as proposed. As the subject lands are located at the edge of an existing neighbourhood, the proposed development

can have a smaller impact on abutting properties when compared to be located in the interior of an existing neighbourhood. The subject lands only interface with residential properties to the south and west and has frontage along two (2) public roads (Wilson Avenue and Concession Street West). Having frontage onto a higher-order road is typical for higher-density developments, which can provide improvements and enhance the existing streetscape in this location by providing an attractive building. With the site's location, traffic impacts can also be minimized as the location of the development provides for convenient and quick access out of the neighbourhood and onto Concession Street West. This can assist in minimizing traffic impacts to the interior of the neighbourhood.

As discussed earlier in Section 4.1, there are significant development constraints on the subject lands imposed due to the sloping located in the northeasterly portion of the site. As such, a consolidated residential development is the most effective form of development for the subject lands. The 6m setback from the slope hazard takes up a significant portion of the subject lands rendering lower density forms of housing (i.e. single-detached, semi-detached) economically unfeasible for the subject lands as only 1-2 lots could be implemented outside of the hazard area. The proposed stacked townhouse provides a feasible form of development that provides a notable increase to the Town of Tillsonburg's housing stock.

Through the above rationale, it has been demonstrated that the subject lands are an appropriate and desirable location for medium-density residential intensification. The following section below analyzes the proposed development against relevant policies of the Oxford County Official Plan providing further illustration that proposed development is appropriate for the subject lands and is consistent with Official Plan policy.

8.2.3.1 Objectives for All Residential Designations

Outside of specific policies for each density tier of residential land uses (i.e. low-density, medium-density), there are policies applicable for all residential designations as outlined in Section 8.2.3.1.

- a) *Provide for a supply of residential land that is sufficient to accommodate the anticipated demand for a broad range of new dwelling types over the planning period, through residential intensification and, if necessary, designated growth areas.*

The proposed housing form, being stacked townhouses, assists the Town of Tillsonburg with broadening the range of housing forms by providing a form of housing that is starting to become more prevalent in the surrounding area (i.e. townhouses located at Balazs Court). The proposed development will help to provide current and future residents of Tillsonburg with a greater range of housing choices promoting affordability.

- b) *Support the provision of a choice of dwelling types according to location, size, cost, tenure, design, and accessibility and designate lands for a range of densities and structural types throughout the Town to satisfy a broad range of housing requirements.*

The immediate neighbourhood surrounding the subject lands is dominated by single detached dwellings. The proposed townhouses will diversify the range of housing in the area, offering a form of housing that does not currently exist in the area. Further, subject to the developer's ownership strategy, units will either be rental or condominium ownership, offering further choices other than freehold ownership.

- d) *Ensure orderly residential development throughout the Town by:*
- *Directing the expansion of residential development into appropriate areas according to availability of municipal services, soil conditions, topographic features, environmental constraints and in a form which can be integrated with established land use patterns;*
 - *Ensuring that approvals for residential development are consistent with servicing capabilities and providing for the efficient allocation of municipal services to ensure that the expansion of services does not occur prematurely.*

The subject lands, being vacant lands surrounded by developed residential areas, are an ideal opportunity for residential infill as the development can make efficient use of existing municipal services. Studies prepared by EXP have identified where development can safely occur outside of any hazardous soil conditions, topographic features, and environmental constraints. The proposed development has also been designed to integrate and be complimentary to the existing land use patterns of the surrounding area.

- e) *Facilitate the efficient use of the existing housing stock, underutilized residential parcels and vacant land designated residential to accommodate future demand for housing and to reduce energy consumption, efficiently utilize municipal services and maximize public open space opportunities.*

The subject lands, being vacant in their current form, are an excellent opportunity to make efficient use of underutilized residential lands and existing municipal services.

- f) *Ensure that the built form, massing and profile of new housing is well integrated and compatible with existing housing and that a compatible transition between lands of different residential densities and between residential and non-residential land uses is achieved.*

The proposed stacked townhouse building has been designed to have a built form that is compatible with the surrounding 1-2-storey residential dwellings in the surrounding area. The materials and architectural styling of the proposed building have been designed to use similar materials in order to provide a functional design that is appropriate with its surrounding context. The height of the building, while taller than other buildings in the area, remains compatible with low-rise buildings.

- h) *Support residential intensification in appropriate locations taking into consideration public services and infrastructure and environmental features and development constraints and ensure the residential intensification target of Section 8.2.2.5, is achieved prior to, or concurrent with, the approval of new residential development in designated growth areas.*

As outlined above, the subject lands are an appropriate location for residential intensification as they can make efficient use of existing municipal services, avoid interference with any development or environmental constraints, and comply with the residential intensification targets of Section 8.2.2.5 as the development will help to meet the minimum 15% target of new residential development within built-up areas in the Town of Tillsonburg.

As the proposed development is considered residential infill (development of vacant areas in built-up areas) analysis of Official Plan infill policies will be required to ensure that the proposed infill development is appropriate for the subject lands and the context of the area.

Due to the nature of the subject lands, it has been identified by staff that the proposed development of the subject lands would fall under and be subject to Backyard Infill policies. Backyard Infill, as described in Section 8.2.4.1.2, is the construction of a residential structure behind a building facing a street, the conversion of a secondary structure for residential purposes, residential development on lots with minimal street frontage, or small vacant remnant parcels of land which cannot be integrated into a plan of subdivision, or on under-utilized or obsolete industrial, commercial, or institutional sites. The proposed development is considered backyard infill as the development is located behind single-detached dwellings fronting onto Wilson Avenue, despite the subject lands actually fronting onto Concession Street West.

In keeping with the criterion for re-designating lands to medium density residential, there are criterion for both general infill as per Section 8.2.4.1.4 and backyard infill as per Section 8.2.4.1.2. Analysis of these policies is outlined below.

8.2.5 Medium Density Residential Areas

Section 8.2.5 (Medium Density Residential Areas) provides site-specific evaluation criterion for any lands proposed for medium density residential development not identified as such on Schedule T-2 which requires an Official Plan Amendment. When Council is to consider such proposal, they are to be guided by the following criteria:

- *The size, configuration and topography of the site is such that there is sufficient flexibility in site design to mitigate adverse effects on the amenities and character of any adjacent Low Density Residential area through adequate buffering and screening.*

As illustrated on the site plan, the proposed building has been situated at a centralized location on a large site (+/- 0.6 ha) where sufficient setbacks to abutting properties can be implemented to provide landscaping and screening to minimize any adverse effects on abutting properties. Importantly, the interface between the subject lands and the abutting single detached dwellings on Wilson Avenue is to include landscaping with vertical elements to provide a visual buffer between properties, in addition to fencing.

- *The location of vehicular access points and the likely effects of traffic generated by the proposal on town streets has been assessed and is acceptable.*

A Traffic Impact Assessment has been prepared by RC Spencer, which concluded that the addition of site generated traffic will have a nominal impact on Wilson Avenue (approximately one additional vehicle every five to six minutes in the respective AM and PM peak hours). Sightlines for egress are clear for good decision-making. Therefore, based on the results of the technical work, it is the engineers' opinion that the proposed residential development will not adversely impact area traffic operations.

- *Adequate hard service capacity including water distribution, sanitary and storm sewers, power and gas distribution facilities is or will be available to accommodate the proposed development.*

The Sanitary Servicing Brief, prepared by GRIT Engineering, concludes that the existing infrastructure/servicing is available to accommodate the proposed development.

- *Off-Street parking and outdoor amenity areas can be provided.*

As illustrated on the site plan, parking is provided at a rate of 1.3 parking spaces per unit. Although this is under the required 1.5 spaces per unit in the zoning by-law, the development still provides each unit 1 parking space, with an additional 8 spaces left over for additional parking. With a number of amenities present in the area surrounding the subject lands, the walkability of the area reduces the dependence on vehicular travel illustrating the proposed parking rate is sufficient for the development.

Additionally, a justification memo was prepared by RC Spencer Associates Inc. utilizing the latest ITE Parking Generation Manual (6th Edition) which found that low-rise multi-family housing with 2+ bedrooms provides a peak parking demand of 1.27 spaces for every two-bedroom unit. This average rate concludes that a minimum of 31 parking spaces will be sufficient for the proposed development and that the proposed 32 surface parking spaces will sufficiently accommodate peak parking demands generated by the proposed development

Outdoor amenity space has been provided at a rate of 40m² per residential unit, providing a spacious outdoor communal amenity area that meets the requirements of the zoning by-law.

- *The effect of the proposed development on environmental resources of the effect of environmental constraints on the proposed development will be addressed and mitigated as outlined in Section 3.2*

As earlier mentioned in this report, that the building is set back at least 6m from the edge of the erosion hazard limit where the slope at the north end of the site is located. This has been determined to be acceptable to LPRCA.

Furthermore, the proposed development has not been identified as having any impacts on environmental resources in the Town of Tillsonburg, nor were any other environmental/ecological reports requested through the Pre-Application Consultation process.

As illustrated above, the proposed development is consistent with the criterion utilized by council for consideration of Official Plan Amendment for re-designating lands for Medium Density Residential illustrating that the proposed development is appropriate for the subject lands.

8.2.4.1.2 Backyard Infill

- *The nature of the proposed residential development will be evaluated having regard to the type of housing found in the surrounding residential neighbourhood.*

The analysis section of this report has identified that there is a range of different housing forms in the surrounding neighbourhood consisting of single-detached dwellings, semi-detached dwellings, and townhouses, noting that the immediate neighbourhood is dominated by small and medium sized single-detached dwellings. These buildings have heights that range from 1-2 storeys in-height and consist of contemporary and mid-century architectural styles.

The proposed development has regard for the existing built form by providing meaningful spatial separation and buffering. For instance, the building is located as far as possible from the single detached dwellings to the south, rather than placing the building at a typical 6m setback for this form of housing to the rear lot line of the abutting dwellings. By locating a landscaped strip containing trees and the drive aisle between the proposed building and abutting rear yards, maximum separation is provided between the uses, thereby having regard of the existing built form and use of the abutting uses.

- *For proposals involving more than two dwelling units, the exterior design in terms of height, bulk, scale, and layout of the proposed building is consistent with present land uses in the area.*

Although the proposed building is a form of housing that is new to the area, the exterior design of the building (i.e. height, scale, and layout) has been designed to be in-keeping with the architectural styling of existing single-detached dwellings in the surrounding area. The layout of the site and building have been designed to provide adequate separation from abutting properties for appropriate screening and buffering of the proposed building.

- *The siting of both buildings and parking areas in relation to the size, configuration and topography of the lot is such that effect on light view and privacy of adjacent backyards is minimal.*

The proposed building has been centrally located as far as possible from dwellings to the south as to minimize visual effects to abutting properties. A large building setback of 20m has been implemented here to ensure sufficient setbacks create proper privacy buffers from these properties. The parking area has also been setback from these properties far enough to ensure sufficient landscaping can be provided here to ensure parking is screened. While detailed lighting plans are not available at this time, there are no shadow impacts from the proposed building due to it being to the north of buildings fronting onto Wilson Avenue.

- *Direct vehicular access to a public street will be required and driveways will have sufficient width to allow efficient vehicular use and turning of both private and emergency vehicles and to provide snow storage.*

A 6.7m, two-lane driveway has been provided with direct connection to Wilson Avenue. The driveway provides sufficient width and turning radii for the turning of emergency vehicles on-site. Space for snow-storage has been accommodated and labeled on the site plan.

8.2.4.1.4 All Infill Proposals

In addition to the infill criteria listed in this Section, the following criteria will apply to all infill proposals:

- a) The location of vehicular access points, the likely impact of traffic generated by the proposal on Town streets and potential traffic impacts on pedestrian and vehicular safety and surrounding properties is acceptable.*

Vehicular access to the subject lands is to be from Wilson Avenue, at the south end of the subject lands. A Traffic Impact Assessment was prepared by RC Spencer Associated Inc. which concludes that traffic generated from the proposed development will have a nominal impact on Wilson Avenue of approximately one additional vehicle every five to six minutes in the respective AM and PM peak hours, but will not adversely impact area traffic operations.

- b) Existing municipal services and public facilities will be adequate to accommodate the proposed infill project.*

The Functional Servicing Report, prepared by GRIT Engineering, concludes that the existing municipal services available to the subject lands can accommodate the proposed development.

- c) Stormwater runoff from the proposal will be adequately controlled and will not negatively affect adjacent properties.*

As per the Stormwater Management Report prepared by GRIT Engineering, stormwater runoff from the proposed development can be adequately controlled on site and will not negatively affect adjacent properties. Complete servicing and grading plans will be required through the Site Plan Approval process.

- d) Adequate off-street parking and outdoor amenity areas will be provided.*

As illustrated on the site plan, parking has been provided at a rate of 1.3 spaces per unit (32 spaces). This rate (although slightly under the required 1.5 spaces per unit of the Zoning By-Law) provides sufficient parking so that each unit has one parking spaces, with 8 spaces for overflow/visitor parking. Sufficient outdoor amenity space, conforming with the requirements of the Zoning By-Law have been provided for the development in locations that are easily accessible from the proposed building. It has been our experience, and that of similar type developments, that a 1.3 space per unit parking ratio is more than sufficient for stacked townhouses.

- e) *The extent to which the proposed development provides for the retention of any desirable vegetation or natural features that contribute to the visual character of the surrounding area.*

Although not yet confirmed, the proposed development may require the removal of some trees located on the subject lands. A Tree Protection Plan and Landscape Plan (usually prepared at the site plan stage) will identify if the extent of any vegetation on site that will need to be removed for the development. However, the proposed development will not have any impact on the existing vegetation at the north end of the site. Landscaping will be implemented through the Site Plan Approval process to add trees around the site, particularly at interface locations with abutting properties.

- f) *The effect of the proposed development on environmental resources and the effects of environmental constraints on the proposed development will be addressed and mitigated in accordance with Section 3.2.*

As noted earlier in this report, a Slope Stability Assessment report was prepared by EXP which analyzed the stability of the slope located at the north end of the subject lands. The findings of the report identified a 6m setback buffer from the edge of the slope erosion hazard in which development on the subject lands can be safely accommodated. Based on this, the development will not have any impact on environmental resources and can be accommodated within the environmental constraints of the subject lands.

- g) *Consideration of the potential effect of the development on natural and heritage resources and their settings*

A Stage 1-2 Archaeological Assessment was undertaken by Earthworks Archaeological Services Inc. to determine if there was any archaeological potential on the subject lands. The findings of the Stage 1-2 Archaeological Assessment found that based on the results of the Stage 1 background investigation and the subsequent Stage 2 test pit survey, the subject lands are considered to be free of archaeological material, and no additional archaeological assessments are required.

- h) *Compliance of the proposed development with the provisions of the Zoning By-Law of the Town and other municipal by-laws.*

This Zoning By-Law Amendment application has proposed to re-zone the subject lands to a site-specific, special provision “*Medium-Density Residential (RM(_))*” zone in order to permit the proposed development. The *RM* zone is an implementing zone of the “*Medium Density Residential*” land use designation.

8.2.7 Site Design Policies for Multiple Unit Residential Development

To ensure that multiple unit residential development provides a high quality of life for residents, that consistent design standards are applied to proposals for multiple unit residential development and redevelopment and that a vision is articulated of those elements which, when applied in

conjunction with one another, result in positive development, the following objectives and design criteria will be considered for all multiple unit development in every designation and be applied where feasible.

8.2.7.1 Buildings

- a) *New multiple unit buildings, especially townhouse dwellings, should avoid long linear orientations, where feasible, by staggering sections of the building and providing periodic breaks in the building line at appropriate intervals. Periodic variations in the roof line for individual units will also be encouraged for townhouse dwellings.*

As shown in the building elevations, sections of the north and south elevations have been recessed into the building to create a staggered look that provides breaks in the building line across these wide elevations. When compared to the length of townhouse buildings in a typical townhouse complex, the proposed building is relatively short.

- b) *Multiple unit dwellings and amenity areas will be sufficiently separated from each other and from parking areas to ensure privacy and to avoid prolonged periods of shadowing especially during winter months. Where a multiple unit residential dwelling abuts lower density residential development, where feasible, the building will be sited to minimize visual intrusion onto neighbouring properties.*

Outdoor amenity space has been located to the north and east of the proposed building, where it can be easily accessed from the building while being located in an area where shadowing will not be a major concern. The proposed building has been centrally located on the subject lands where large setbacks can be utilized for landscaping and fencing to minimize the visual effects of the proposed building to abutting properties.

- c) *Multiple unit residential dwellings will be generally situated such that a majority of dwelling units will benefit from passive solar orientation.*

The proposed building has been located in an area where passive solar orientation can be achieved for a large portion of the building.

- d) *A portion of all townhouse dwellings in each development will provide barrier-free access to persons with mobility limitations. All apartment buildings will have at least one entranceway which provides barrier-free access.*

One (1) access parking space has been provided for the proposed development, providing a barrier-free path of travel to the main building entrance as well as the outdoor amenity area. Specific barrier-free units have not yet been identified for this development, but will be through the Site Plan Approval process.

- e) *Where a site is characterized by topographic variations, the development will be designed as much as possible to fit the contour of the land. In order to provide development which is at human scale, higher profile buildings within the development will generally be situated at lower elevations.*

As outlined earlier in this report, the subject lands can be characterized by the existing slope found at the north end of the lands. A report/study has been prepared by EXP which outlines setbacks from the edge of the slope (end of the potential erosion hazard caused by the slope) where development can safely occur. The proposed development has been located with respect to these setbacks to mitigate any erosion concerns. While the policy above suggests that development could be located at the north end of the subject lands, LPRCA has already refused the notion of development in that area.

8.2.7.2 Driveways and Parking Areas

- a) *Communal parking areas will generally be developed with a number of small parking lots oriented towards individual residential complexes within a development. Parking lots should generally be not more than 45 metres from the units they serve. Where significant numbers of communal parking spaces are situated beyond the distances, drop-off facilities close to building entrances should be provided. Individual parking areas located in front of dwelling units will provide adequate space for vehicles and snow storage.*

Parking for the proposed development has been provided in front of the proposed building and on the east of the building as well. All parking spaces are located in an area that is less than 45 metres from the main building entrances. Adequate space has been allocated for snow storage, as labelled on the site plan.

- b) *Where possible, more than one access will be provided to a multiple unit residential development and all parking areas will be accessible from each access point for emergency vehicles. Where multiple unit residential developments abut one another, the integration of driveways and/or parking areas to allow emergency or maintenance vehicles to manoeuvre between sites will be considered as part of the design.*

Only one access point has been provided for this development (access is provided from Wilson Avenue). As previously mentioned, the sloping at the north end of the site does not allow for a safe vehicular access to Concession Street West at this location. As such, an appropriate turn-around area for emergency and maintenance vehicles has been provided in the parking area located to the east of the proposed building.

- c) *Partial screening of surface parking lots may be provided through the use of low fences, walls, and landscape elements while still recognizing the need for orientation and safety. Surface parking lots may be screened from the public street through a combination of location, berming and landscaping.*

Fencing and landscaping will be provided around the perimeter of the site to ensure that there is proper screening of the surface parking areas from abutting properties. Where fencing currently exists, a new fence may be installed in accordance with direction provided by the Town.

- d) *Driveways will have sufficient width to allow efficient vehicular use including turning movements for both private and emergency vehicles.*

The proposed driveway has a width of 6.7m, which is wide enough to allow for efficient turning movements for private and emergency vehicles. A turn-around area located in the east parking area has been provided to assist with the turning of larger vehicles as there is no secondary access point to the subject lands. A fire route is also included in the driveway.

g) Separate and distinct visitor parking areas will be provided.

Visitor parking spaces will be identified and labelled on the site plan during the site plan approval process.

8.2.7.3 Pedestrian Activity

a) A separate and distinct pedestrian system will be provided to allow for pedestrian movement into, within, and out of the development and links with communal open space, play areas, parking lots, adjacent public open space and adjacent pedestrian systems in multiple residential development.

A pedestrian sidewalk has been provided along the north and west sides of the driveway, providing connection from Wilson Avenue to the building entrance, parking area, and outdoor amenity area.

b) Sidewalks will be adequately set back from the public and internal road and driveway network to allow snow ploughing and will be adequately drained.

Sidewalks on site have been located to allow for proper snow ploughing and drainage.

c) The on-site pedestrian system will provide continuous barrier-free movement throughout the site as much as possible by incorporating features such as curb cuts, railings, rest areas and by minimizing slopes.

Where possible, barrier-free movement has been incorporated into the on-site pedestrian system by using curb cuts and minimizing sloping for areas where sidewalks are located.

d) The on-site pedestrian system should be wide enough to allow two persons to move in a side-by-side fashion.

Sidewalks within the site have been provided at a width of 1.5m, which is sufficient for the purpose of allow two persons to move side-by-side.

e) Where the pedestrian system crosses driveways and parking areas, visual priority will be provided to the pedestrian system through the use of crosswalks or the continuation of the walkway material across the driveway and parking area.

No crosswalks are being proposed in the design of the pedestrian circulation for this development.

8.2.7.4 Landscaping

A future landscape plan and tree protection plan will be provided to include specific details on the planned design for landscaping and an outline for which vegetation is to be removed/retained with

the construction of the proposed development. Landscaping will be utilized to provide adequate screening and visual buffers around the perimeter of the property to minimize visual impacts of the development to abutting properties.

8.2.7.6 Utilities and Operation Facilities

- a) *Garbage storage facilities will be provided within the building, within a maintenance building or within a screened enclosure. Such facilities will be conveniently situated for users and minimize heavy truck movements within the site. Where feasible, communal composting and recycling facilities will be provided.*

Garbage is to be stored internally and will be brought out front for collection. A proper turn-around area has been included on-site to minimize heavy truck movements when collecting garbage.

- b) *Utility metres will be situated in a location acceptable to the Public Utilities Commission which is easily accessible but protected from the public for safety.*

Utility metres for the proposed building will be situated in a location that is acceptable to the Public Utilities Commission.

- d) *Adequate on-site drainage will be provided.*

A detailed grading and drainage plan will be prepared through the Site Plan Approval process.

- e) *Required fire hydrants will be shown on site plans, will be in a location acceptable to the Fire Chief, and landscaping of the site will be designed to maintain fire hydrant visibility.*

Fire Hydrants will be shown on the site plan, in a location acceptable to the Fire Chief.

8.2.7.7 Safety/Comfort

- a) *Sufficient lighting to Illuminating Engineering Society (I.E.S) standards of parking areas, driveways, pedestrian areas and building entranceways will be provided to facilitate vehicular and pedestrian movement, and for safety and security. Undesirable effects of lighting on residential units and on adjacent uses will be minimized through measures such as directed lighting, the use of shades, diffusers, and tinted covers.*

On-site lighting provided in the driveway, pedestrian areas, and building entrances will be designed to the standards of the I.E.S. through the Site Plan Approval process.

- b) *Adequate signage will be provided within the development to indicate areas of no parking and emergency vehicles routes. Locational signs may be required near entrance driveways to indicate individual buildings in the development and visitor parking areas. Signage, both on standards and on the ground, will be readable both during the day and night through techniques such as size, colour, surface treatment or illumination.*

Signage will be provided on site to indicate emergency vehicle routes, no parking areas, and visitor parking spaces and designed to be visible during both day and night. Such signage will be identified through the Site Plan Approval process.

- c) *Driveways and parking areas will be designed and/or will incorporate elements which will establish traffic speeds to maximize pedestrian safety.*

The pedestrian circulation system for the proposed development has been designed to minimize interaction between pedestrians and vehicles going through the site. The proposed sidewalk leads to the main building entrances without having to cross over the driveway or parking areas.

- f) *Where a development is affected by environmental factors such as noise, vibration, or other constraints identified in Section 3.2 and mitigation measures are required to ensure the safety and comfort of occupants, such mitigation features will be incorporated into site plans.*

As earlier outlined in this report, a 6m development setback from the erosion hazard limit identified by EXP has been utilized to ensure the proposed development is located outside of any environmental hazards on site.

- g) *When required, emergency access routes will be identified on site plans. Where emergency access routes are identified, signage to prohibit parking or stopping will be required and will incorporate features to impede vehicular traffic expect in times of emergency.*

An emergency vehicle access route is shown on the site plan. All required signage required for the emergency vehicle route will be included on site as well.

As demonstrated above, the proposed Official Plan Amendment and Zoning By-Law Amendment are consistent with the objectives of the Oxford County Official Plan and are appropriate for the subject lands.

7.3 THE TOWN OF TILLSONBURG ZONING BY-LAW

The subject lands are zoned “*Low-Density Residential – Type 1 (R1)*” in the Town of Tillsonburg Zoning By-Law No. 3295. The “*Low-Density Residential – Type 1 (R1)*” zone only permits single-detached dwellings and does not permit townhouses.

The proposed Zoning By-Law Amendment application seeks to re-zone the subject lands to a site-specific, special provision “*Medium-Density Residential (RM(_))*” zone to permit the proposed 3.5-storey stacked townhouse building. Special provisions for the zoning are as follows:

- To permit a lot frontage of 10m*, whereas the minimum requirement for lot frontage in the RM zone is 20.0m. This provision is reflective of an existing condition of the site;
- To permit a west interior side yard setback of 3.3m, whereas the minimum required interior side yard setback is 4.5m; and,
- To permit a total of 32 parking spaces (1.3 spaces per unit) for the proposed development, whereas the minimum number of required parking spaces is 36 (1.5 spaces per unit).

*The actual frontage of the lands is 10.68m on Wilson Avenue. This regulation has been rounded down for simplicity. It has no impact on the development itself.

The RM zone is the implementing zone for the Medium Density Residential land use designation in the Oxford County Official Plan for Tillsonburg and guides the forms of residential development permitted in these designated areas. Uses include townhouses and multiple-unit dwellings, such as the proposed stacked townhouse dwelling. As outlined in Section 3 of this report, due to the development constraints of the subject lands due to the sloping, the subject lands primarily lend itself to a compact, medium-density residential development. These constraints, combined with zoning provisions, do not provide the ability to provide more single-detached dwellings in a feasible fashion, whereas the proposed 3.5-storey stacked townhouse can provide a higher number of residential units, while only needing minor special provisions to the RM zone.

Table 1 below provides a breakdown of the “Medium-Density Residential (RM)” zone regulations and the requested site-specific “RM()” zone provisions.

Table 1 – Zoning Statistics - *Denotes Required Special Provision

Regulations	Medium-Density Residential (RM) Requirements	Proposed
Lot Area (Min.)	160.0m ² per unit (24 x 160 = 3,840.0m ²)	5,968.8m ²
Lot Frontage (Min.)	20.0m	*10m
Lot Depth (Min.)	30.0m	99.1m
Front Yard Setback (Min.)	7.5m	44.2m
Rear Yard Setback (Min.)	10.5m	33.1m
Interior Side Yard Setback (East)(Min.)	4.5m	34.5m
Interior Side Yard Setback (West)(Min.)	4.5m	*3.3m
Landscaped Open Space (Min.)	30%	61%
Coverage (Max.)	40%	9%
Height (Max.)	15.0m	<15.0m
Density (Max.)	N/A	41 UPH
Amenity Area (Min.)	40.0m ² per unit (24 x 40 = 960.0m ²)	960.0m ²
Parking (Min.)	1.5 space per unit (24 x 1.5 = 36 spaces required)	*32 spaces

The regulations for the zone are standard, except for specific regulations relating to the lot frontage, west interior side yard setback, and parking spaces as discussed in the following section.

Lot Frontage

The subject lands provide 10.68m of frontage along Wilson Avenue, whereas the minimum lot frontage requirement of the RM zone is 20.0m. The lot frontage along Wilson Avenue represents the access point to the subject lands, as access from Concession Street West is not feasible due to sloping/grading concerns at the north end of the subject lands. Although the lot frontage along Wilson Avenue does not meet the minimum lot frontage requirement, it still maintains the intent of lot frontage requirement as there is sufficient width at this location to provide a 6.7m driveway that is large enough for 2-way traffic, and a 1.5m pedestrian sidewalk, providing sufficient access to the subject lands and proposed development. Given the specific nature of the site, this frontage cannot be changed and is therefore appropriate to recognize through a site-specific regulation.

West Interior Side Yard Setback

The location of proposed building provides a west interior side yard setback of 3.3m, whereas the minimum required interior side yard setback is 4.5m. Due to the erosion concerns due to the sloping/grading at the north end of the subject lands, the location of the proposed townhouse

building was very limited in where it could be located, resulting in the 3.3m west interior side yard setback. Although the side yard setback is less than the required minimum, there is sufficient space in that location to providing landscaping and fencing to provide appropriate screening measure for abutting properties. The requested 3.3m setback represents a 1.2m difference from the standard 4.5m setback, a difference that, given the specific interface and context, would not provide any meaningful difference in land use compatibility. Furthermore, this setback only applies to a small portion of the building, not the entire building face due to the orientation of the lot lines.

Parking Spaces

The proposed development provides a total of 32 parking spaces, whereas the minimum parking requirement of 1.5 spaces per unit requires a minimum total of 36 parking spaces for the 24-unit development. Although the development proposes 4 less parking spaces than the required minimum, parking is still provided at a rate slightly higher than 1 space per unit (the proposed development provides parking at a rate of 1.3 spaces per unit) where each of the 24 residential units will have at least 1 parking space, with 8 spaces remaining for visitors and additional parking. Given the type of housing proposed, it has been our experience that many units will only require 1 parking space, whereas some will require two. The notion of providing slightly less parking is consistent with contemporary medium density housing parking supply, and reduces potential traffic generation for Wilson Avenue. Given the context of the site and the nature of the proposed development, a parking rate of 1.3 spaces per unit is appropriate.

8.0 CONCLUSIONS

The proposed Official Plan Amendment and Zoning By-Law Amendment seek to permit the development of a 3.5-storey stacked townhouse containing a total of 24 residential units on the subject lands. This proposal to develop the subject lands achieves the goals of the Oxford County Official Plan by providing appropriate residential intensification and an efficient/cost-effective residential development that maintains a built form and intensity that is compatible with surrounding land uses.

The subject lands are vacant and underutilized in their current form and are clearly not efficiently used for their planned function. Through the County of Oxford Official Plan, townhouses are a housing form that is contemplated through residential intensification as it helps to diversify the housing stock for the Town of Tillsonburg and provides residents with a wider range of housing options and affordability. The proposed development is also appropriately located and will integrate well with the existing neighbourhood surrounding the subject lands.

Based on the above, and as detailed throughout this Planning Justification Report, the proposed Official Plan Amendment and Zoning By-Law Amendment is consistent with the intent and policies as set forth in provincial and municipal planning documents. As such, the proposed Official Plan Amendment and Zoning By-Law Amendment are appropriate and are consistent with the 2024 Provincial Planning Statement and the County of Oxford Official Plan, are in the public interest.