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MEMORANDUM

To: City of Pickering
City Development Department

Attn: Mr. Nilesh Surti

From: Adam Layton – Goldberg Group

Date: September 13, 2024

RE: Policy Conformity Review: Provincial Planning Statement, 2024
720 Granite Court, City Pickering
1334281 Ontario Limited
Files: OPA 23-004/P and A 10-23

1.0 Introduction

Goldberg Group has been retained by 1334281 Ontario Limited, the Owner of the property municipally described as 720 Granite Court, in the City of Pickering, and legally described as “PT Bayly Street, PL 40M-1334, PTS 1, 2 & 3, 40R18421, S/T Ease Over PT 2, 40R18421 AS IN LT86838, S/T EASE OVER PT 3, 40R18421 AS IN LT10042 1; Pickering” (the ‘subject property’). The subject property is located at the northwest corner of the intersection formed by Whites Road South and Granite Court. The site is presently vacant, is irregularly shaped, and has an approximate area of 1.21 hectares (2.94 acres).

Applications to amend the City of Pickering Official Plan (POP) and City of Pickering Zoning By-law 2511 (ZBL) were deemed complete on June 26, 2023.

A Community Information Meeting was hosted on September 20, 2023, and was subsequently considered at a Statutory Public Meeting before the Planning and Development Committee on November 6, 2023.

In response to comments and concerns raised by members of the Public and Council, the proposed building height has been reduced to 10 storeys along Whites Road and 7 storeys along Granite Court to help minimize any potential concerns of the overlook and shadowing. The proposed building would contain approximately 262 apartment dwelling units, in a mix of layouts and sizes. Additionally, a non-residential unit has been added to the ground floor of the

building along the Whites Road frontage to contribute to the mix of uses within the area. This unit has a size of approximately 81 square metres (870 square feet), with a dedicated waste storage room.

On August 20, 2024, the Minister of Municipal Affairs and Housing released the Provincial Planning Statement 2024 (PPS 2024) issued under Section 3 of the Planning Act. The PPS 2024 will consolidate and replace the previous Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe. The PPS 2024 is to come into force and effect as of October 20, 2024, and applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after this date.

As the planning process for the proposed development is not anticipated to conclude prior to October 20, 2024, the proposed development must be consistent with the PPS 2024. This Policy Conformity Report provides an analysis of the proposed development to the updated PPS 2024.

2.0 Proposed Development

The proposed development contemplates the construction of a ten (10) storey mixed use commercial residential building containing a commercial unit (81 square meters) and 262 dwelling units. The proposed commercial unit is proposed at grade and can be accessed directly off Whites Road. A range of unit types are proposed consisting of bachelor, 1-bedroom, 1-bedroom plus den, 2-bedroom, and 2-bedroom plus den options.

The proposed units are supported by a parking supply of 404 spaces located at grade and within a two-level underground parking structure. A total of Eleven (11) barrier free parking spaces are provided at grade and on each of the parking spaces. The proposed parking rate is equivalent to 1.29 spaces per dwelling unit for residents and 0.25 spaces per unit for visitors.

A supply of 158 bicycle parking spaces is proposed consisting of 27 short term spaces at grade, and 131 long term spaces contained in secure, access-controlled rooms, which meets the requirements of the City Integrated Sustainable Development Standards (ISDS). The proposed development also features 190 storage lockers for residents (0.72 per unit).

The building continues to maintain a setback in excess of 25 metres from the adjacent rail corridor, and site circulation/access remains to be provided from a full moves driveway along Granite Court, located as far west of the intersection of Granite Court and Whites Road as possible to maintain sightline distances. The building is massed to provide a solid and consistent street wall along both Whites Road and Granite Court, with step-backs and articulation incorporated to provide visual interest and maintain a pedestrian scale. While the previous iteration of the proposal complied with a 45-degree angular plane projected from the opposite side of each right-of-way to maintain an appropriate transition to the adjacent community areas, this condition has been further improved as a result of the reduction height from 12-storeys to 10-storeys.

Pedestrian access to the building remains to be provided from Whites Road, connecting to the surface parking area by a lobby space which bisects the ground floor ensuring ease of movement between the private and public realms. In addition to the pedestrian entrance, the public realm is activated through the inclusion of private terraces and balconies along the Whites Road.

The development also features both indoor and outdoor amenity spaces with a total combined area of 1,232.17 square metres (+/-13,262.96 square feet). The proposed outdoor amenity space at grade features an open field space various forms of activity, fenced dog run zone, raised wood planters for vegetable gardens, children's play area, and multiple seating areas. It is also contemplated that a terraced seating area will be provided. As a result of the grade change along Whites Road this area would form a natural amphitheater providing opportunities for innovative programming of the outdoor area. There is a further open play area provided west of the surface parking area, which is not included in the above calculations, but which would afford further opportunities for amenity space.

Additionally, indoor amenity space is provided at grade (148 square meters) and on the second level (185 square meters). Private terraces and balconies are also provided for dwelling units.

A three (3) meter high acoustic barrier is proposed along the Metrolinx rail corridor to the west of the property in addition to the line of trees proposed along the site boundary. This barrier covers the outdoor amenity areas to the north and runs along the western site boundary covering the at-grade parking area. The acoustic barrier is discontinuous to support connectivity and has a sufficient overlap to maintain connectivity on the site. An added acoustic barrier of 1.8 meters is proposed along the outdoor amenity area which is connected to the indoor amenity area at grade to mitigate the impact of the rail corridor. Additionally, the Derailment Protection Study conducted concluded that adequate derailment protection measures are present on the subject property.

A shadow study has been prepared which demonstrates that the shadow impact from the proposed development has minimal impact on neighbouring sites. The residential areas to the south and south-east are not impacted by any shadows, with the area to the east only experiencing shadows after 3 pm in March/September, and minimum encroachment after 4pm in June.

3.0 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024 (the "PPS") was released by the Minister on August 20, 2024, and came into force on October 20, 2024. The PPS applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024.

The PPS replaces both the 2020 Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020. The PPS is intended to be a streamlined province-wide land use planning policy framework that provides municipalities with the tools and

flexibility in order to facilitate the development of at least 1.5 million homes by 2031. This document provides policy direction on matters of provincial interest related to land use planning and development. Further, all decisions “must be consistent with” the PPS.

The PPS provides a policy framework and direction for municipalities to achieve complete communities through accommodating a range and mix of land uses, housing and transportation options, employment, and other uses to meet long-term needs, improve accessibility for people of all ages and abilities by addressing land use barriers, and improving social equity and overall quality of life for everyone.

Within the PPS, the following definitions are of relevance in the context of the proposed development:

- **Compact built form**, which means: “ *a land use pattern that encourages the efficient use of land, walkable neighbourhoods, mixed land uses (residential, retail, workplace, and institutional) all within one neighbourhood, proximity to transit and reduced need for infrastructure. Compact built form can include detached and semi-detached houses on small lots as well as townhouses, duplexes, triplexes and walk-up apartments, multi-storey commercial developments, and apartments or offices above retail. Walkable neighbourhoods can be characterized by roads laid out in a well-connected network, destinations that are easily accessible by transit and active transportation, sidewalks with minimal interruptions for vehicle access, and a pedestrian-friendly environment along roads.*”
- **Complete communities**, which means: “ *...places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.*”
- **Designated growth areas**, which means: “ *...lands within settlement areas designated for growth or lands added to settlement areas that have not yet been fully developed. Designated growth areas include lands which are designated and available for residential growth in accordance with policy 2.1.4.a), as well as lands required for employment and other uses.*”
- **Settlement areas**, which means: “ *...urban areas and rural settlement areas within municipalities (such as cities, towns, villages and hamlets). ... Settlement areas are: a) built-up areas where development is concentrated and which have a mix of land uses; and b) lands which have been designated in an official plan for development over the long term.*”
- **Strategic growth areas**, which means, within settlement areas: “ *...nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include major transit station areas, ... and other areas where growth or development will be focused, that may include infill, redevelopment*”

*(e.g., **underutilized shopping malls and plazas**), brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas. **[emphasis added]***

- **Transit-supportive**, which in regard to land use patterns, means: “...development that makes transit viable, optimizes investments in transit infrastructure, and improves the quality of the experience of using transit. It often refers to compact, mixed-use development that has a high level of employment and residential densities, including air rights development, in proximity to transit stations, corridors and associated elements within the transportation system....”

Generally, the PPS directs growth and development to settlement areas through intensification, with a particular focus on strategic growth areas, including major transit station areas, and a land use pattern based on a mix of uses which efficiently uses land and resources, optimizes the use of existing and planned infrastructure and public service facilities, and supports active transportation and transit, while providing a full range of housing options.

Additionally, the PPS identifies a number of Large and Fast Growing Municipalities in Schedule 1, which includes the City of Pickering.

The PPS also acknowledges that “...municipal official plans are the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning.”, and that “Zoning and development permit by-laws are also important for the implementation of the Provincial Planning Statement. Zoning and development permit by-laws should be forward-looking and facilitate opportunities for an appropriate range and mix of housing options for all Ontarians.”

Section 6.1(5) of the PPS directs that municipal Official Plans should “provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas”. This section also indicates that “the policies of the Provincial Planning Statement continue to apply after adoption and approval of an official plan”. Therefore, the PPS is considered independent of approved municipal Official Plan’s when conducting a planning evaluation.

Since official plans and zoning by-laws are not static and evolve by way of amendment, each municipality must ensure that the official plan and zoning, and the related amendments, are up to date, and “consistent with” the PPS. In this regard, a site specific Official Plan and Zoning By-law Amendment is a Planning Act means of ensuring that the City Official Plan and Zoning By-law remains consistent with the PPS.

Vision

The PPS provides a Vision for Ontario’s Land Use Planning System, recognizing the need to achieve the Province’s goal of at least 1.5 million new homes by 2031, increasing the supply and mix of housing options, and addressing the full range of housing and affordability needs.

The PPS also identifies that the land use framework, and the decisions that are made, shape how communities grow and prosper. In this regard, the Vision includes:

“Prioritizing compact and transit-supportive design, where locally appropriate, and optimizing investments in infrastructure and public service facilities will support convenient access to housing, quality employment, services and recreation for all Ontarians...”

The following PPS 2024 policies are of particular relevance to the redevelopment of the subject lands:

- **Policy 2.1.1:** *As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.*
- **Policy 2.1.2:** *Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.*
- **Policy 2.1.3:** *At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance.*
- **Policy 2.1.4:** *To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:*
 - a. *maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and*
 - b. *maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*
- **Policy 2.1.6:** *Planning authorities should support the achievement of complete communities by:*
 - a. *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
 - b. *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
 - c. *improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*
- **Policy 2.2.1:** *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*
 - a. *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:*

- i. *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*
 - ii. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
 - c. *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
 - d. *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*
- **Policy 2.3.1.1:** *Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.*
 - **Policy 2.3.1.2:** *Land use patterns within settlement areas should be based on densities and a mix of land uses which:*
 - a) *efficiently use land and resources;*
 - b) *optimize existing and planned infrastructure and public service facilities;*
 - c) *support active transportation;*
 - d) *are transit-supportive, as appropriate;*
 - **Policy 2.3.1.3:** *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.*
 - **Policy 2.3.1.4:** *Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.*
 - **Policy 2.3.1.5:** *Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.*
 - **Policy 2.4.1.1:** *Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.*
 - **Policy 2.4.1.2.:** *To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:*
 - a) *to accommodate significant population and employment growth;*
 - b) *as focal areas for education, commercial, recreational, and cultural uses;*
 - c) *to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and*
 - d) *to support affordable, accessible, and equitable housing.*
 - **Policy 2.4.1.3.:** *Planning authorities should:*
 - a) *prioritize planning and investment for infrastructure and public service facilities in strategic growth areas;*
 - b) *identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas;*
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- c) *permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form;*
- d) *consider a student housing strategy when planning for strategic growth areas; and*
- e) *support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential. [emphasis added]*
- **Policy 2.4.3.1:** *Planning authorities shall plan for intensification on lands that are adjacent to existing and planned frequent transit corridors, where appropriate.*
- **Policy 2.9.1:** *Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:*
 - a) *support the achievement of compact, transit-supportive, and complete communities;*
 - b) *incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*
 - c) *support energy conservation and efficiency;*
 - d) *promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and*
 - e) *take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.*
- **Policy 3.1.2:** *Before consideration is given to developing new infrastructure and public service facilities:*
 - a) *the use of existing infrastructure and public service facilities should be optimized; and*
 - b) *opportunities for adaptive re-use should be considered, wherever feasible.*
- **Policy 3.2.2:** *Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.*
- **Policy 3.4.1:** *Planning for land uses in the vicinity of airports, rail facilities and marine facilities shall be undertaken so that:*
 - a) *their long-term operation and economic role is protected; and*
 - b) *airports, rail facilities and marine facilities, and sensitive land uses are appropriately designed, buffered and/or separated from each other, in accordance with policy 3.5.*
- **Policy 3.5.1:** *Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.*
- **Policy 3.5.2:** *Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse effects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.*
- **Policy 3.6.1:** *Planning for sewage and water services shall:*
 - a) *accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;*

- **Policy 3.6.2.:** *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.*
- **Policy 3.6.8.:** *Planning for stormwater management shall:*
 - a) *be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
 - b) *minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
 - c) *minimize erosion and changes in water balance including through the use of green infrastructure;*
 - d) *mitigate risks to human health, safety, property and the environment;*
 - e) *maximize the extent and function of vegetative and pervious surfaces;*
 - f) *promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
 - g) *align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.*
- **Policy 4.2.3.:** *Municipalities are encouraged to undertake, and large and fast-growing municipalities shall undertake watershed planning to inform planning for sewage and water services and stormwater management, including low impact development, and the protection, improvement or restoration of the quality and quantity of water.*

The subject property is located within the *settlement Area* of the City of Pickering which is also identified as *Large and Fast-Growing Municipality* within the PPS 2024. The POP also identifies the subject site as being within the *Mixed-Use Area - Local Node* designation, where intensified land uses and built form are anticipated, and where full municipal services are available to service the subject property. The POP permits anticipated residential uses to a maximum density of 30 to 80 units per hectare and 2.0 FSI. While the proposed development exceeds the density in terms of units per hectare, it remains compliant with the FSI metric. A rationale for this increase has been provided in the previously submitted Planning Justification Report prepared by Evans Planning and remains relevant despite the change in Policy Framework implemented through the PPS 2024. Notably, the identification of the site within such a designation, and as a *Local Node* can be interpreted to indicate that the subject site is within a *strategic growth area* and *designated growth area* as defined in the PPS 2024, and within which growth is to be focused.

The proposed development is consistent with the Policies in **Sections 2.3.1.2, 2.3.1.3, 2.3.1.4** and **2.3.1.5** that promote compact, active-transportation and transit supportive development. It contemplates an urban form that establishes more efficient and intensified land uses within an urban area, and on the basis full municipal services. The proposed development meets the definition of *transit supportive* and *compact built form*, both which are encouraged by the PPS. The resulting development will provide and a diverse mix of housing options adjacent to an existing transit route, and within walking distance of further options providing inter- and intra-municipal connectivity.

The proposed development is governed by City of Pickering Zoning By-law 2511, as amended. This By-law was initially passed by Council in 1960 and approved by the Ontario Municipal Board in 1963. While the POP identifies the subject property as being within a *Local Node* area which allows for residential, local retail, offices and restaurants, community and recreational uses and community gardens and farmers markets and reflects the development needs of the area, the Zoning By-law, as amended in 2004 through By-law 6358/04, permits only retail food store and other commercial uses on the subject property.

A Land Use Compatibility Study has been conducted for the subject property which concludes that the proposed development remains compatible with the existing employment areas located west of the subject property beyond the rail corridor. It outlines the noise mitigation measures which have been implemented through the design process. Thus, the contemplated development complies with **Section 2.8.2.5** and **Section 3.5** of the PPS 2024.

Additionally, a Derailment Protection Study conducted in May 2023 was submitted as a part of the previous submission. The study concluded that the site is presently sufficiently protected by the principal protection feature in the form of a natural earth berm. Additionally, a 2.43 meters high chain link fence was recommended on the western property line of the subject property which is implemented through the design and planning process. Furthermore, the structure is positioned away from the rail corridor and a 'low occupancy' area (parking) has been integrated along it.

Section 2.9.1 of the PPS 2024 directs Municipalities to plan for a changing climate by supporting the achievement of compact, transit- supportive communities that promotes low impact development, active transportation and protect the environment. The proposed development proposes a commercial area of 81 square meters and 262 new dwelling units that provides a diverse mix of housing options that supports compact development, affordability and helps create mixed use *complete communities* on an otherwise vacant property in a *Local Node*.

Furthermore, the proposed development is transit supportive and is well connected to the regional and local transit network. Durham Region Transit routes operate in proximity of the subject property providing connections to higher orders of transportation such as the GO Train, several Transit Terminals, and the Durham Pulse line which operates across Durham Region between Oshawa and Scarborough. It also contemplates the provision of bike parking facilities that will connect to the local active transportation system. The Water Balance Report outlines the variety of low impact development measures that can be used to mitigate the changes in the existing soil structure and ground water levels. Additionally, an Environment Site Assessment was conducted to ensure the protection of the environment and ensure long-term sustainability.

As previously discussed, and elaborated in the Planning Justification Report, the subject property is well serviced by existing municipal systems and can meet the current and projected needs of the contemplated development and is thus in keeping with the direction of **Section 3.1.1** of the PPS 2024.

Section 3.2.2 of the PPS 2024 directs the efficient use of existing infrastructure including transit and transportation corridors. In addition to the use of existing municipal sewer and water services, the traffic impact study demonstrates that the traffic generated by the proposed development can be adequately accommodated within the planned transportation network of the area. Furthermore, alterations to the permitted movements through the existing intersection of Whites Road and Granite Court are proposed to help alleviate the perceived impacts of traffic through the area and minimize queuing for the northbound left turn movement. Notably, the existing site-specific By-law permits a grocery store with an area of 2,300 square metres. As a basis for comparison, the trip generation of a residential building is approximately half of that of a grocery store during the a.m. peak hour and 6.5 times less than that of the grocery store during the p.m. peak hour that is presently permitted on the subject property.

On this basis, the impact of the proposed development on existing road infrastructure is substantially less than that already permitted on the subject site. Additionally, a series of transportation demand management measures, including appropriate reductions to the proposed parking supply, are to be provided to minimize vehicular travel in the future.

Policy 3.6.2 provides that municipal services are preferred within settlement areas, which is to be fulfilled by the proposed development. Similarly, **Policy 3.6.8** outlines requirements for planning for stormwater management, which has been addressed by the stormwater management plan provided for the proposed development.

The PPS 2024 also outlines in **Policy 3.9.1** how the planning of public streets to be safe for persons of all ages, including pedestrians, in order to foster interaction and facilitate community connectivity. In this regard, the improvements to the public realm to be implemented by the proposed development include the installation of new, or improvements to existing, sidewalks along both Granite Court and Whites Road, including upgrading the cross section of the boulevard to include area for planting and separation from the travelled portion of the road.

Further, **Policy 4.2.3** directs at the protection, improvement and restoration of the ground water quality and quantity. The subject property is located within the Highly Vulnerable Aquifers, with a Hydrogeological report, Water Balance Report, and Stormwater Management Plan have submitted have been provided under a separate cover, demonstrating the low impact development measures have been outlined to help mitigated the effect of the proposed development on ground water and thus is consistent with the PPS 2024.

The proposed development is appropriate and reflects good planning principles. The form of development will aid in achieving previously established municipal and provincial intensification targets while providing a compact built form, at transit supportive densities within a strategic growth area and designated growth area, while diversifying the provision of housing options which can be considered more affordable and attainable than the prevailing forms of housing within the community. The proposed development will continue to make efficient use of land and resources and provide an appropriate transition to existing residential uses.

The conclusions of the previously provided Planning Rationale remain valid and are expanded through this Memorandum to describe the changes to the built form to be implemented through the advancement of the application process, and to review the development on the basis of the PPS 2024.

It is our summary position that the proposed development is consistent with the PPS 2024.