

Ms. Tricia Givens
Director of Planning
Norfolk County
185 Robinson Street
Simcoe, ON N3Y 5L6

Date: March 14th, 2024

Our Ref: 140608

Subject: Waterford Urban Boundary Expansion – Statement of Support and Planning Review of Proposed Lands

Dear Ms. Givens,

Thank you for the opportunity to review the proposed urban boundary expansion areas that were presented at the Public Open House held on February 8, 2024. As you may recall in October 2022, on behalf of our clients, Arcadis (formerly IBI Group) submitted a request to the County to consider the inclusion of approximately 32 hectares (herein referred to as the “subject lands”), located on the southern boundary of the existing urban area of Waterford, east of Old Highway 24 and Blue Line Road, which is an area physically suited for development, that is not constrained by natural heritage features or existing uses. The subject lands are shown below in **Figure 1 below** and have a combined frontage of approximately 415 metres on County Road 24 (Old Highway 24)/ Main Street and Blue Line Road. The subject lands are legally described as Parts of Lot 7 and 8, Concession 9, Township of Townsend (Waterford), County of Norfolk. The majority of the subject lands are vacant, however the existing house and bunkhouse fronting onto County Road 24 is being rented for residential purposes, while the remaining structures are empty barns and are used for the overflow storage of farm equipment as needed.

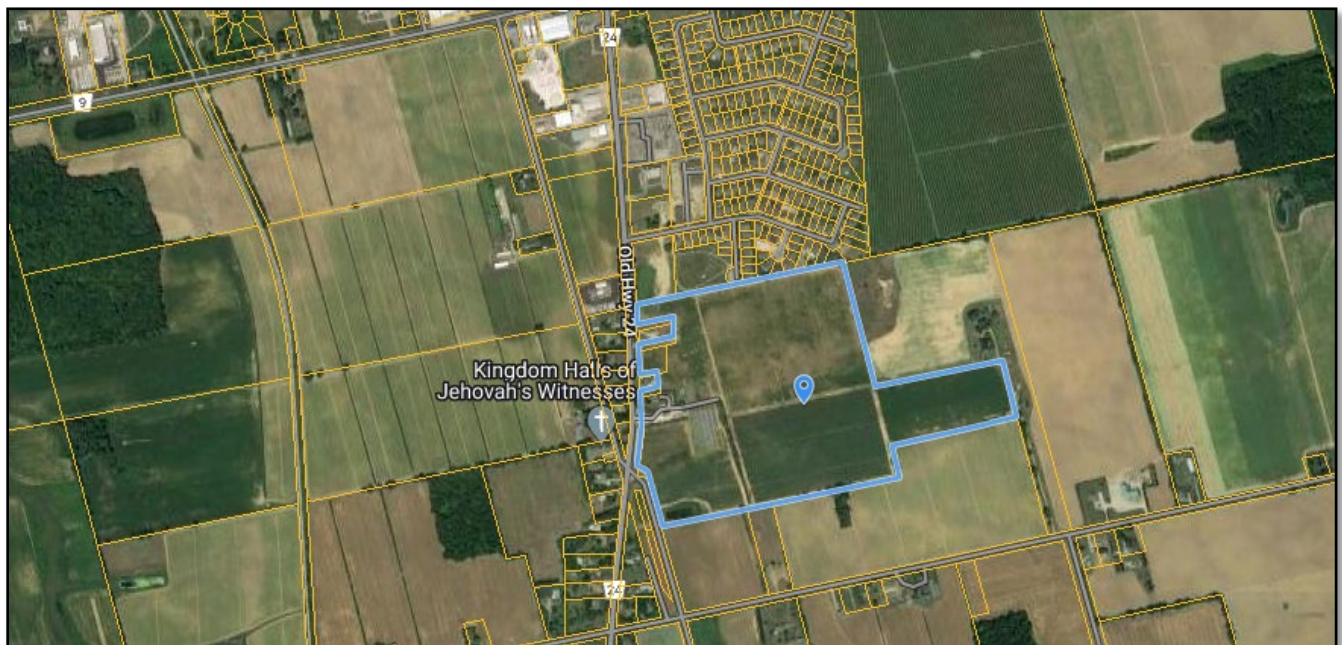


Figure 1: Aerial of Subject Lands, Retrieved from Geowarehouse

Ms. Tricia Givens
Norfolk County
March 14th, 2024

We have reviewed the County's proposal to include the 10 hectares of the total land holdings in the urban boundary. While we are generally supportive of the inclusion of a portion of the subject lands, we maintain that inclusion of entire lands would provide more substantive benefits to the community that include:

- protecting agricultural operations, as the subject lands are not located near existing livestock barns and meet the requirements of the Minimum Distance Separation formulae;
- protecting existing natural heritage features or areas of environmental concern;
- completing planned community connections with the extension of Jong Street South;
- creating a walkable community, which is within close proximity to existing services and commercial uses along County Road 24, promoting active transportation other than the car for day-to-day tasks;
- providing opportunities to expand on the commercial presence along County Road 24;
- providing a housing mix that may incorporate affordable housing and rental housing, which would meet the preferred Growth Strategy endorsed by Council;
- creating a visually attractive gateway into Waterford, framing a key entrance for visitors entering into the community of Waterford and;
- being development-ready, as the proposed watermain extension will proceed along County Road 24, thus reducing infrastructure expansions to service future development in comparison to other proposed areas.

As noted above, the subject lands are located at the southern edge of the existing Waterford Urban Area with frontage along County Road 24. A residential subdivision is located immediately north of the subject lands. The inclusion of the entirety of the subject lands would result in the orderly and logical extension of the existing residential uses, with the proposed extension of Jong Street, creating pedestrian connections between existing and future communities. It would also provide an opportunity to improve the existing park fronting onto County Road 24.

The location of the subject lands is in close proximity to a number of existing commercial, community (i.e. St. Bernard's School, Waterford District High School) and recreational uses (i.e. Yins Park, Tricenturena). More specifically, commercial shopping areas (i.e. Foodland/ Rexall Plaza) on County Road 24 are located within a short walking distance, therefore any proposed development of the subject lands will have an opportunity to expand the commercial presence along County Road 24, while increasing customers to the commercial area and reducing the dependency on automobile uses, while promoting active transportation for day-to-day tasks. Currently, there are no existing sidewalks along County Road 24, however connections to existing sidewalks for safe pedestrian movement can be provided through the proposed Jong Street Extension. Additionally, an existing walkway from Yu Boulevard to the commercial uses on County Road 24 is located within 500 metres from the proposed Jong Street Extension, which will provide accessible access to nearby commercial services.

It is our client's intent to propose a housing mix, which incorporates affordable housing and rental housing to appeal to a wider range of demographics and socio-economic characteristics. This would meet the proposed mix within the preferred Growth Strategy and assist with meeting some of the priorities of the County's Housing and Homelessness Plan. Precedent images of the proposed medium density housing forms have been included as Appendix A to this letter.

Location wise, the subject lands provide an ideal opportunity to create a gateway feature, which will frame a key transportation corridor. Through built form and/or signage, the proposed gateway would provide for a visually attractive and welcoming feature for visitors entering the community of Waterford.

The preferred option resulting from of the Norfolk Municipal Class Environmental Assessment for the watermain extension proposes the future watermain to follow Concession 12 Townsend and extend north and south on the Rail Trail adjacent to County Road 24. The proposed infrastructure will increase available capacity to the Waterford community and provide the required water servicing capacity to meet its projected growth needs. Access to existing water, wastewater stormwater infrastructure can be accomplished with servicing extension from the existing residential subdivision to the north from Jong Street as well as from the existing stormwater, wastewater and water infrastructure located on the west side of County Road 24 across from Lam Boulevard. As such, the subject lands represent a logical extension of the community, which requires minimum extensions to the existing municipal infrastructure. Timing wise, the subject lands are development-ready, as they are not encumbered by any existing natural heritage, cultural heritage or required infrastructure improvements, in comparison to other proposed parcels which may result with shorter approvals timelines to get homes built faster, as mandated by provincial direction.

1.0 Settlement Area Boundary Expansions Policy Review

The following policies of the Provincial Policy Statement 2020 provide the criteria necessary to evaluate potential urban boundary expansion. Norfolk County has initiated the municipal comprehensive review (“MCR”) process based on the policies extracted below.

- 1.1.3.8 *A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been demonstrated that:*
- a) sufficient opportunities to accommodate growth and to satisfy market demand are not available through intensification, redevelopment and designated growth areas to accommodate the projected needs over the identified planning horizon;*
 - b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;*
 - c) in prime agricultural areas:*
 - 1. the lands do not comprise specialty crop areas;*
 - 2. alternative locations have been evaluated, and*
 - i. there are no reasonable alternatives which avoid prime agricultural areas; and*
 - ii. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;*
 - d) the new or expanding settlement area is in compliance with the minimum distance separation formulae; and*
 - e) impacts from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area are mitigated to the extent feasible.*

In accordance with the PPS, the following policies within the County Official Plan provide the criteria necessary to evaluate the expansions of Urban Areas.

- 6.4. *f) Subject to the policies of this Plan, the boundaries of the Urban Areas shall be permitted to expand as needed, based on a demonstrated lack of available designated land and development trends. Proposals to expand the boundaries of an existing Urban Area shall be considered through a comprehensive review of this Plan. Proposals shall be considered in the context of whether:*

- i) the amount of land included within the expansion area is justified based upon the amount and nature of land available for development within the County as a whole and the Urban Areas on an individual basis, the population and household projections for the County, and the intended role of the Urban Area.*
- ii) The proposed expansion is a logical extension of the Urban Area and will be serviced by full municipal sewer and water services.*
- iii) the land is physically suitable for development, considering any constraints, such as Hazards Lands, or Natural Resource Areas.*
- iv) The proposed expansion will have a compact form, an appropriate mix of land uses, where practical, and densities that efficiently use land, infrastructure, and public facilities, while providing for adequate parks and open space.*
- v). the transportation network can reasonably accommodate the additional volume of traffic and demand for services.*
- vi) Suitable community and public facilities are available or can be provided to accommodate the expansion area.*
- vii) A suitable plan for phasing, financing, and construction of the infrastructure for the expansion area is developed.*
- viii) prime agricultural areas are only included within the expansion area if there are no reasonable alternative areas with lower priority agricultural land.*
- ix) opportunities for intensification, infill and redevelopment have been explored, and accounted for in evaluating alternatives to an Urban Area expansion.*
- x) The proposed expansion will not impact cultural heritage resources.*
- xi) the proposed expansion will not impact any Significant Natural Heritage Features as identified on Schedule "C" and/or Tables 1 or 2 of Section 3.5 (Natural Heritage Systems); and*
- xii) the proposed expansion satisfies the Province's Minimum Distance Separation Formulae.*

The County is currently in the process of undertaking its MCR as required by the foregoing policy. It is our opinion that the subject lands in its entirety will better meet the criteria identified above within the provincial and local policies.

The community of Waterford has been identified as requiring an expansion of its urban boundary to meet the projected growth and residential needs through the MCR. Though the County has identified that 10 hectares of the subject lands should be added to the Urban Area, it is our opinion that the entirety of the subject lands would represent an ideal opportunity for expansion to meet the current and projected needs of the population of Waterford and the County as a whole. The prepared projected growth rates through the County's MCR would support the inclusion of the subject lands, which are intended for future residential or mixed-use development.

As stated previously, the subject lands are an optimal location for an Urban Boundary Expansion, given that it is located at the south edge of the existing Urban Area, with frontage along County Road 24, a designated arterial road. It is in proximity to community/ public facilities, commercial uses and employment opportunities within Waterford. In addition, the subject lands abut an existing residential subdivision, therefore the inclusion of the entirety of the subject lands would represent a logical extension of the community. Services exist just north along

Ms. Tricia Givens
Norfolk County
March 14th, 2024

County Road 24 with additional servicing connections possible through the existing residential subdivision is currently connected to municipal services, with the potential for an extension of these services through Jong Street, which would meet the needs of any future development on the subject lands. As such, the proposed expansion would facilitate an efficient use of land, infrastructure and public facilities.

Based on the evaluation provided by the County, the subject lands do not constitute 'Specialty Crop Area'. Future development on the subject lands is anticipated to comply with the minimum distance separation formula developed by OMAFRA as it has been observed there is an absence of active livestock operations in the immediate surroundings. As provided in the LEAR Analysis prepared by Orion Environmental Solutions Inc., only accepting 10 hectares out of the 30 hectares would result in further fragmentation of agricultural land and optimizing the use of the existing parcel to focus development adjacent to existing uses is an appropriate alternative to minimizing the impact of growth on agricultural land. Alternative expansion areas have been evaluated in **Section 3.0** of this letter.

The majority of the subject lands are currently vacant and do contain significant vegetation or grading issues that would have to be rectified prior to development. This is to be further qualified in future technical reports. As seen in Schedule C-*Natural Heritage* and Schedule J – *Natural Resources* of the County Official Plan, the subject lands do not contain any Hazard Lands or Natural Heritage features.

2.0 Evaluation Criteria for Urban Boundary Expansions

As part of the County's MCR, the following evaluation criteria for the Urban Boundary Expansions were developed. While the County has developed their own rating for the subject lands, the following will provide our findings and analysis of the subject lands that may provide supplemental site-specific information that may improve final score produced by the County. The supplemental information is provided in each of the scoring categories listed in the Supplemental Evaluation Criteria for Urban Boundary Expansion Requests.

- Complete Communities
 - Walkability
 - Commercial Proximity
 - Presence of Heritage Designated Structures
- Agricultural
 - LEAR
- Infrastructure
 - Connectivity
 - Water
 - Wastewater
 - Storm Sewer
- Community Infrastructure
 - Transportation
 - Childcare
 - Medical Access
- Institutional
 - County Facilities
 - Institutional Access
- Natural Heritage and Open Space
 - Parks
 - Natural Heritage

Complete Communities

Walkability – County Score: 3

Commercial Proximity – County Score: 4

The subject lands are located within a 400 metres radius from the a commercial area along County Road 24, which includes essential services such as a grocery store, bank, a medical office, personal service establishments and a gas station, among other uses. The inclusion of the entirety of the subject lands would create a complete walkable community, which is close to existing commercial uses along County Road 24 and can be utilized to expand the commercial presence along County Road 24, where residents are encouraged to use active transportation. Aligning with both provincial and municipal policies regarding walkable communities and the necessity of adequate access to commercial uses within an urban context.

Currently, there are no existing sidewalks along County Road 24, however connections to existing sidewalks for safe pedestrian movement can be provided through the proposed Jong Street Extension. Additionally, an existing walkway from Yu Boulevard to the commercial uses on County Road 24 is located within 500 metres from the proposed Jong Street Extension, which will provide accessible access to nearby commercial services.

The subject lands do not include any structures designated as heritage, and any future development is not anticipated to impact any properties with heritage designations. This would be in keeping with the County’s policies regarding heritage protections, which would encourage development to be planned in a way that does not impact existing heritage properties.

Agricultural

LEAR - County Score: 2 (LEAR- 811)

The subject lands have undergone a Land Evaluation and Area Review (“LEAR”) as part of their consideration for inclusion within the urban boundary. While the County has provided a LEAR Score of 811 for the subject lands, Orion Environmental Solutions Inc. was been retained to undertake their own analysis, which concluded that the entire parcel is already significantly impacted by residential development, as it is located within 500 metres of an existing residential subdivision and rural strip development along Highway 24. Only accepting 10 hectares of development within the 30 hectare parcel would result in further fragmentation of the agricultural land. In addition, the land value of the remaining 20 hectares would exceed what is economically viable for purchasing the land for agricultural production. As such, optimizing the use of the entire parcel to focus development along County Road 24, which is adjacent to existing development and infrastructure is an appropriate alternative to minimizing impact of growth on agricultural land.

In addition, it has been determined by the County that no specialty crop is present on the subject lands and that the subject lands would not be considered as a prime agricultural area.

Infrastructure

Connectivity - County Score: 3 (Arterial Road Access on 1 side or Collector Road Access on 2+ sides)

The subject lands are well-situated in terms of connectivity to the wider community, due to the wide frontage along Highway 24, which is an arterial road and the only road which travels the length of Waterford, thereby connecting the subject lands to the rest of the community. Furthermore, the proposed development would include an extension of Jong Street to the south, thereby providing two access points, one via an arterial road and one via a local road, which would provide access to the subject lands from its north and west frontages. As stipulated in the PPS, urban development should facilitate an easy access in and out of the subject lands for both vehicles and alternative forms of transportation. The proposed development would also include a paved sidewalk connection along the Jong Street extension, thereby improving pedestrian circulation and active transportation.

Ms. Tricia Givens
Norfolk County
March 14th, 2024

Water – County Score: 4 (Medium Infrastructure Investment Required for additional main and local conveyance systems: Where existing systems have sufficient capacity and are in a good state of repair)

Wastewater – County Score: 4 (Medium Infrastructure Investment Required for additional main and local conveyance systems: Where existing systems have sufficient capacity and are in a good state of repair)

Storm sewer - County Score: 3

Both the Provincial and County policies emphasize the importance of municipal servicing for residential developments within the urban boundary. While the subject lands are not currently connected to municipal water services, the Norfolk Municipal Class Environmental Assessment for the watermain extension proposes the future watermain to extend north and south on the Rail Trail adjacent to County Road 24. The proposed infrastructure will increase available capacity to the Waterford community and provide the required water servicing capacity to meet its projected growth needs. In addition, access to existing water, wastewater stormwater infrastructure can be accomplished with servicing extensions from the existing residential subdivision to the north from Jong Street as well as from the existing stormwater, wastewater and water infrastructure located on the west side of County Road 24 across from Lam Boulevard.

There are no observable grade restrictions or topographical constraints on the subject lands that would result in submerged sewers. In addition, the Yin Storm Water Pond is located directly north of the subject lands.

Community Infrastructure

EMS Distance: County Score: 4

Childcare: County Score: 2 with 189 spots for Childcare

Medical Access: County Score: 0

The subject lands are in close or relative proximity to a number of key community infrastructure components, including emergency services, childcare and medical access. The subject lands are located within a 2-minute drive to the fire and ambulance station along County Road 24, ensuring rapid and easy access to the subject lands for key emergency services, and a 15-minute drive to the Norfolk General Hospital, situated within Simcoe.

Similarly, there are four registered day care centres, namely Home Comforts Childcare and Edukids Day Care Centre are located with 1 km to 1.5 kms from the subject site, ensuring that future residents have a range of options available to them that provide necessary childcare services.

We are not in agreement with the rating provided to the medical access factor. The subject lands are in close proximity to a number of health-care related clinics and services, which includes a Rexall Drugstore and an Eyecare Clinic less than 50 metres north of the subject lands in the nearest commercial plaza along County Road 24. The Waterford Dental Clinic and Waterford Family Health Centre is located within approximately 2-3 minutes of the subject lands.

Institutional

County Facilities – County Score: 3

Institutional Access – County Score: 3

The planning policies at the Provincial and municipal level emphasize the importance of the provision of Institutional uses in order to support a complete community. The evaluation criteria for the accessibility to county facilities is distinguished between major facilities (i.e., libraries, arenas, and pools) and minor facilities (community centres). The Norfolk County Library – Waterford Branch and Tricenturena Waterford Area is located within a 3-minute drive

Ms. Tricia Givens
Norfolk County
March 14th, 2024

from the subject lands. In addition, the Waterford and District Lions Community Centre is also located within a 3-minute drive from the subject lands. These are easily accessible to future residents.

Institutional Access includes schools, early ON centers and places of worship. The subject lands are located within a 2-minute drive of St. Bernard's School and a 3-minute drive of Waterford Public School and a 2-minute drive of Waterford District High School. The nearest Early On Centre is within Simcoe, an 11-minute drive from the subject lands. Nearby places of worship include Sacred Heart Ukrainian Catholic Church and St. Bernard Clairvaux Parish.

Based on a review of the subject lands and their context within Waterford, it is our opinion that residents of any future development on the subject lands would be able to easily access both major and minor county facilities and institutional uses that are already established in the community.

Natural Heritage and Open Spaces

Parks – County Score: 1 with a Park Rating of 10

Natural Heritage – County Score: 3 (0.11%)

Within a 1.5 kilometer radius of the subject lands, a number of community, and linked open space exist, including Yins Park, the LE&N Trail, and the Waterford Audrey S. Park. The subject lands are located in proximity to Jong Street Parkette, which is occupied by the stormwater management pond and the open space to the north. As part of any future development, an extension or continuation of those recreational lands could be contemplated to improve the quality of the existing park. This would improve the existing open spaces in the community and provide additional outdoor recreational spaces for future residents.

It is worth noting that a review of Schedule C-*Natural Heritage* of the Official Plan and an aerial of the subject lands has not identified any significant Natural Heritage features, which would require protection or buffering as part of any future development. Therefore, it is our opinion that the subject lands would be ideal for development.

3.0 Evaluation Criteria of Other Proposed Urban Area Boundary Changes

In addition to our review and analysis of planning merits of the subject lands, we have also undertaken a brief planning review of the three other parcels proposed to be included as residential areas for Waterford. The parcels are identified as Areas 1 to 3 Proposed Urban Area Boundary Changes for Waterford provided in **Figure 2** below:

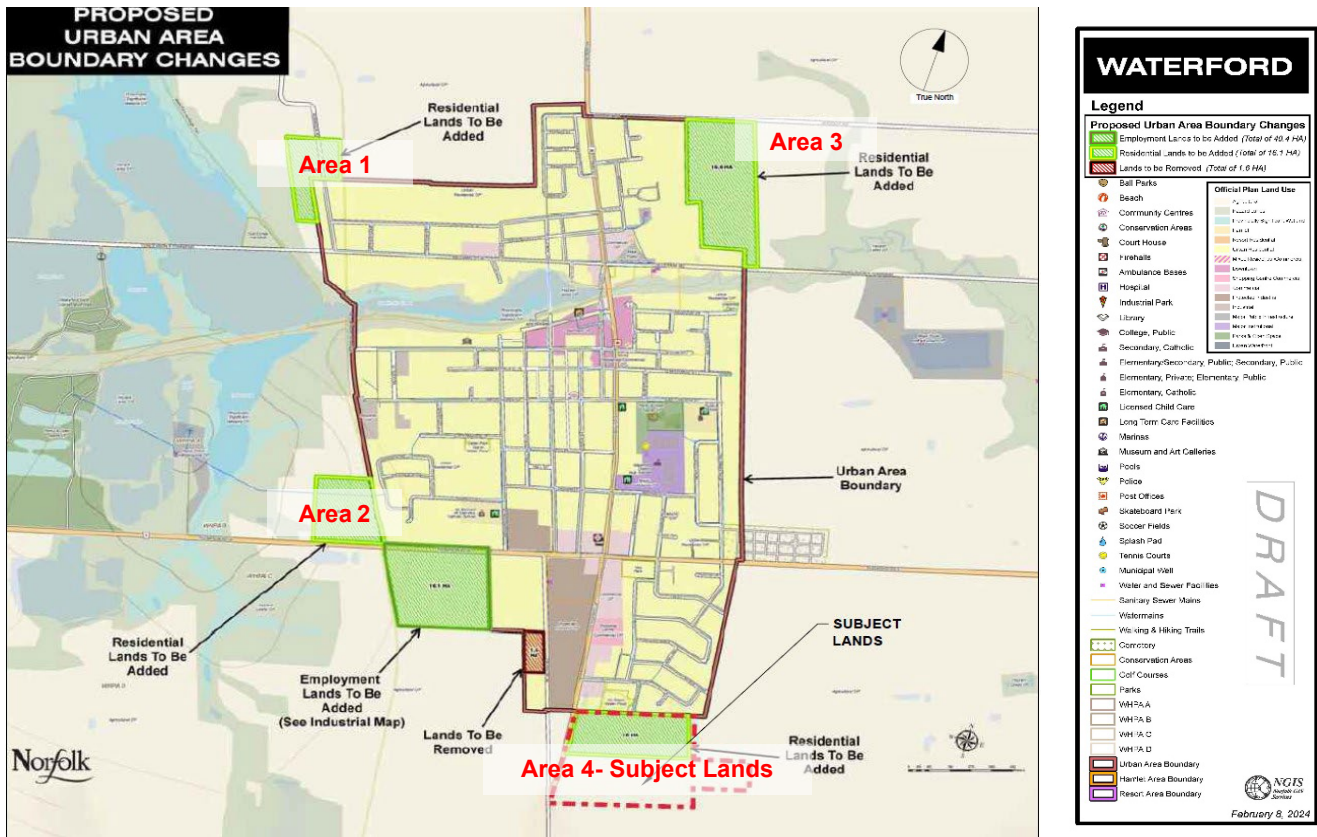


Figure 2: Proposed Urban Area Boundary Changes for Waterford issued by the County Feb. 8, 2024

Each of the proposed areas were evaluated based on a standardized list of criteria listed in the Table below.

Criteria	Area 1 (5.6ha) Robinson Rd	Area 2 (8.0ha) Thompson Rd.	Area 3 (16.6ha) Deer Park Rd.	Area 4 (10.0ha) "Subject Lands"
Access to County Road infrastructure		✓		✓
Does not contain Natural Heritage Features or their buffer areas?			✓	✓
Located in close proximity to existing services, commercial, community and recreational			✓	✓
Provides for gateway opportunity		✓		✓
Does not contain existing structures	✓		✓	✓

Ms. Tricia Givens
Norfolk County
March 14th, 2024

As seen above, the subject lands meet all the criteria, compared to the other areas considered for Urban Expansion.

Evaluation Discussion

Area 1 - 5.6 hectares located on Robinson Road

Located on Robinson Road, while Area 1 provides a logical extension of residential uses, it is further away from local commercial and community services. In addition, it is noted that there are existing constraints, which could limit the development potential. In particular, the southern portion of the parcel located west of the existing homes is constrained by its narrow configuration. Efficient development of this portion of lands may require consolidation with additional lands on Robinson Road to ensure for an efficient land use pattern. In addition, this specific portion of Area 1 is also constrained with potential setbacks required to protect the natural heritage features found within the Waterford Conservation Area. Buffer sizes subject to a future environmental impact study may limit the available development area. Conversely, the northern portion of Area 1 is currently vacant and not similarly encumbered by environmental features or their buffers. Robinson Road is currently a rural road. Road infrastructure improvements may be required to facilitate future residential development.

Area 2- 8.0 hectares located on Thompson Road

The lands identified as Area 2 shown on **Figure 4** below, currently contain an existing commercial business specializing in the sale and service for recreation vehicles– the “Adventure RV Centre”. Given its access to Thompson Road (an arterial road), these lands are best suited for their current commercial land use. However, if future residential development is desirable, it would require the relocation of the existing business prior to the land being developed for residential purposes. Although not an uncommon requirement, proposed residential uses would require a Record of Site Condition and the remediation of any areas of environmental concern within the property. The lands are well situated at a potential gateway location for Waterford, however we respectfully submit that the County consider Area 2 as being better suited as future employment lands, which would benefit from being located at the western edge of the urban area as well as having easy access to Thompson Road West, which is designated as County Arterial Road.

Area 3- 16.6 hectares located on Deer Park Road

Area 3 is located along Deer Park Road and is generally well-suited for future residential development due to its proximity to community amenities and existing commercial areas. However, there are limited opportunities to provide internal vehicular road connections into the surrounding neighbourhood, thus reducing connectivity to the rest of the area. We note that the development of this area may necessitate upgrades to Deer Park Road and Woodley Drive, which are designated as local roads, and this may impact timing for the construction of new residential homes.

Ms. Tricia Givens
Norfolk County
March 14th, 2024



Figure 3: Aerial photo of proposed Area 1 and Streetview, Retrieved from Google Maps 2024



Figure 4: Aerial Photo of Area 2, Retrieved from Google Maps 2024



Figure 5: Aerial Photo of Area 3, Retrieved from Google Maps, 2024)

4.0 CONCLUSION

In conclusion, in comparison to the other areas proposed for residential urban expansion, we respectfully submit that the inclusion of the entirety of the subject lands provide a more logical and efficient community pattern that has the greatest opportunity to facilitate residential and commercial growth for Waterford. The subject lands require limited infrastructure improvements to boundary roads and water and wastewater systems and is largely “development ready” if given the approvals to include these lands.

The subject lands are in close proximity to the existing commercial corridor along County Road 24 and residential subdivisions to the north, which can be advantageous in creating a complete walkability community, that would contribute to the existing commercial presence on County Road 24 and complete the planned connection for the abutting residential subdivision with the extension of Jong Street.

We acknowledge that a key factor in determining areas for expansion was the result of the LEAR data collected during the Grow Norfolk Study. The subject lands are not located near existing livestock barns and meet the requirements of the Minimum Distance Separation formulae to support residential development. Therefore, to provide a site specific review of the LEAR data presented by the County’s consultant, 214 Carson Co. has retained Orion Environmental Solutions Inc. to review the results of the LEAR study and to provide site specific conclusions for the subject lands. This report has been included within the submission and has concluded that only accepting 10 hectares of development within the 30 hectare parcel would result in further fragmentation of the agricultural land. Rather, optimizing the use of the entire parcel to focus development along County Road 24, which is adjacent to existing development and infrastructure is an appropriate alternative to minimizing impact of growth on agricultural land.

The County has presented a preferred Growth Strategy, which focuses growth to urban serviced areas such as Waterford with the intent that these areas could provide additional housing in the short term, in comparison to other serviced areas that require more significant servicing upgrades. It is our opinion that in addition to the locational merits of the subject lands described above, the inclusion of the entirety of the subject lands as originally requested has the greatest opportunity to facilitate residential and potential commercial growth for Waterford within a shorter time frame given that level of existing infrastructure currently located at the boundary of the subject lands.

Ms. Tricia Givens
Norfolk County
March 14th, 2024

Additionally, the owners of the lands have expressed interest to provide their commitment to meet some of the priorities of the County's Housing and Homelessness Plan by committing to partnerships with not-for-profit housing corporations such as Habitat for Humanity or similar housing partners, ensuring that an affordable housing component would be included into the future development of the subject lands. Another initiative also being considered is the provision of purpose built additional residential units that would assist with meeting the objective of developing more rental housing or units in the County. Further collaboration with the municipality is recommended to explore the opportunities that will meet more opportunities to where possible.

We hope that the above review has identified the merits of the subject lands for the inclusion of the entirety of the lands within the Waterford urban boundary and trust that you will take them into careful consideration during the finalization of the final boundary expansion for Waterford. On behalf of our client, we thank you for your time and for the opportunity to actively participate in this process.

Sincerely,
Arcadis Professional Services (Canada) Inc.



Carmen Jandu, MCIP RPP
Associate – Senior Planner



Ritee Haider, MCIP RPP
Planner

Cc:

- K. Carson – 214 Carson Co. - client
- B. Hayward- 214 Carson Co. – client
- J. Ariens – Arcadis

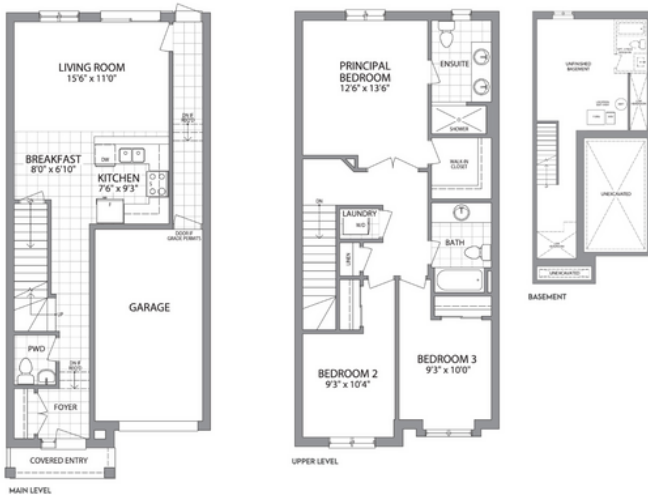
Ms. Tricia Givens
Norfolk County
March 14th, 2024

Appendix A
Precedent Images of Townhouse Dwelling Types

SAMPLE EXTERIOR



SAMPLE FLOOR PLAN



SAMPLE EXTERIORS



SAMPLE FLOOR PLAN



SAMPLE EXTERIORS



SAMPLE FLOOR PLAN

