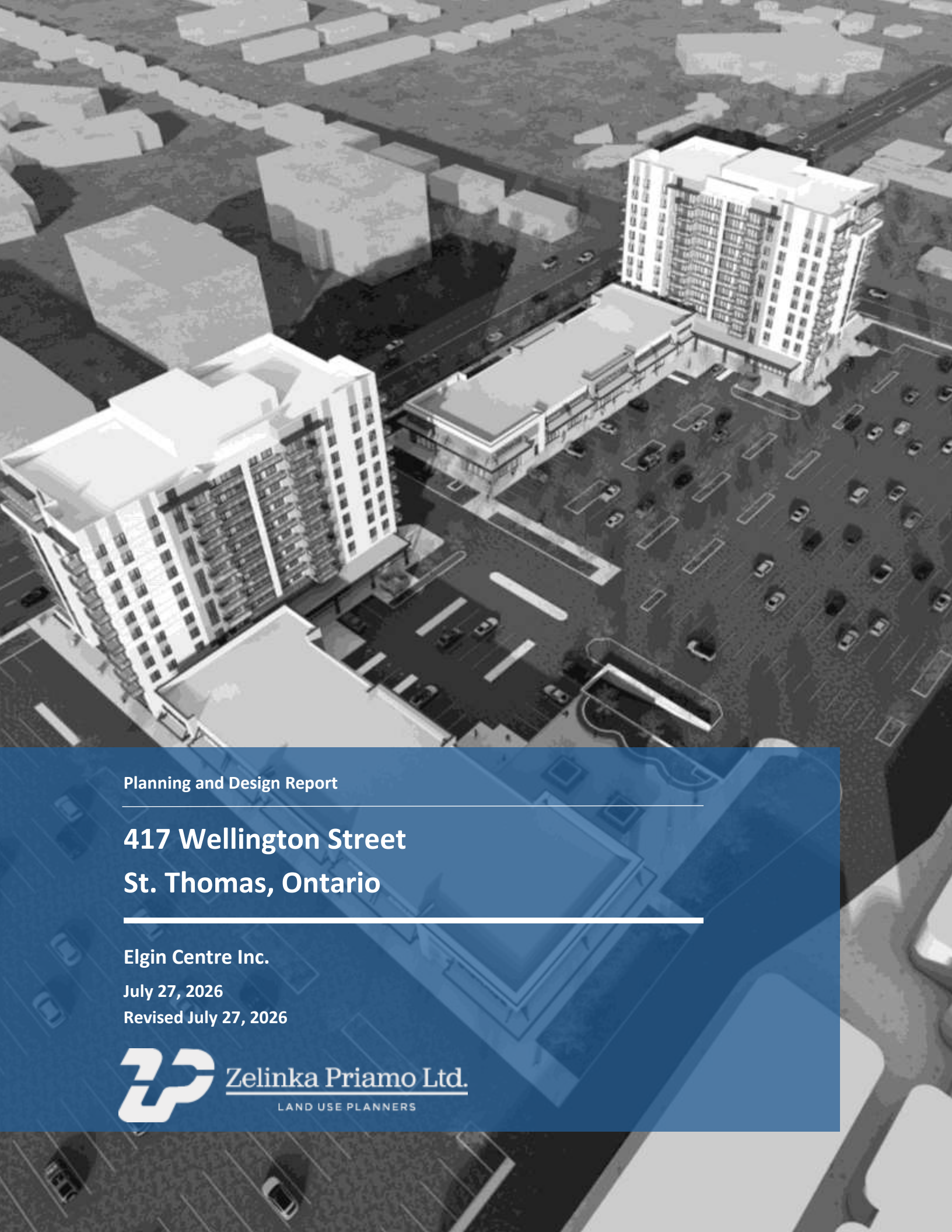




Planning and Design Report

417 Wellington Street St. Thomas, Ontario

Elgin Centre Inc.

July 27, 2026

Revised July 27, 2026



Zelinka Priamo Ltd.

LAND USE PLANNERS

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1.0 INTRODUCTION AND SUMMARY

Elgin Centre Inc. has submitted an application to the City of St. Thomas to amend the City's Zoning By-Law for lands known municipally as 417 Wellington Street, or colloquially known as the Elgin Centre Mall (hereby known as the "subject lands"). The intent of the application is to re-zone the subject lands to permit the development of two (2) 10-storey, mixed use buildings, and two (2) 1-storey commercial buildings being developed in phases. The proposal consists of a total of 232 residential units, and a total of 3,860m² of new gross leasable commercial floor area for the combined phases. The existing mall is to remain, but the restaurant in the southwest corner of the site will be replaced.

The purpose of this Planning Justification Report is to evaluate the proposed Zoning By-Law Amendment within the context of existing land use policies, regulations, and guidelines, including:

- The Planning Act;
- 2024 Provincial Planning Statement (PPS 2024);
- The Official Plan for the City of St. Thomas;
- The City of St. Thomas Zoning By-Law 50-88; and,
- St. Thomas City Wide Urban Design Guidelines.

The report concludes that the proposed Zoning By-Law Amendment is appropriate for the subject lands for the following key reasons:

- The proposed Zoning By-law Amendment is generally consistent with the policies of the PPS 2024 and is in conformity with the City of St. Thomas Official Plan and St. Thomas Urban Design Guidelines;
- The proposed Zoning By-law Amendment will permit new residential uses on lands designated for a mix uses that is well suited to support more density;
- The development will make efficient use of underutilized lands and will locate new residential units and retail commercial uses adjacent to the Elgin Centre Mall;
- The proposed development is generally compatible with abutting and adjacent uses with access to amenities and infrastructure; and,
- The intensification of the subject lands will have a positive impact on the character and function of this commercial node in St. Thomas.

2.0 SUBJECT LANDS

The subject lands are located on the north side of Wellington Street between Highview Drive and Manor Road, approximately 265m east of the Wellington Street and Fairview Avenue intersection (Figure 1). The lands are comprised of two irregularly shaped parcels with a combined land area of 7.09ha (19.5ac), a lot frontage of approximately 336.0m along Wellington Street, and a depth of approximately 234.6m.

Figure 1 – Subject Lands – Aerial View (Outlined in Red)



The subject lands are currently occupied by a single-storey shopping mall with a range of commercial uses including Galaxy Cinemas, Metro, Giant Tiger, etc. and an associated surface parking lot consisting of 1,116 parking spaces. The lands also contain a single-storey restaurant (Denny's) in the southwest corner and a recently constructed five-storey hotel (Holiday Inn) in the northwest corner which was severed from the larger mall property in 2019.

Figure 2 – Subject Lands (Aerial View)



Land uses surrounding the subject lands consist of the following:

North: Low-density residential uses, with industrial lands located further north;

East: Institutional use (St. Thomas Christian Church), with low- to medium-density residential uses located further east;

South: High-density residential use (Wellington Park Towers). Further south are institutional uses, including Caressant Care on Bonnie Place, as well as low-density residential development;

West: Low-medium-density residential uses (townhouses and single-detached dwellings), with an institutional use (YMCA Cornerview Child Care) located further west.

The subject lands are generally flat, but slope gently from northeast to southwest, toward Wellington Street. Landscape trees are located around the perimeter of the subject lands to the west and south, but no landscaping is located within the boundary of the subject lands.

There are currently four existing vehicular driveways along Wellington Street, and two along Highview Drive, providing entry to the existing parking lots and commercial loading docks. Public sidewalks are located along Wellington Road and Highview Drive. Access to public transit is available along Wellington Street and Highview Drive (Routes #2 and #5a), providing connections throughout the City of St. Thomas, plus additional transit stops on-site.

Figure 3 – Subject Lands from Wellington Street



The subject lands are within the “*Major Commercial*” land use designation on ‘Schedule “A” – Land Use Plan’, and fronts Wellington Street and Highview Drive, which are “*Major Arterial*” and “*Major Collector*”, road classifications on ‘Schedule “B” – Roads Plan’, respectively, in the City of St. Thomas Official Plan.

The subject lands are currently zoned “*Major Commercial (C4-6)*” in the City of St. Thomas Zoning By-law. A Zoning By-law Amendment was recently Approved for a portion of the subject lands (excluding the Holiday Inn property) to also add “*Major Commercial (C4-7)*” permissions to the property to permit a kennel.

As discussed later in this report, given the context of the surrounding residential densities; the proximity to a variety of built forms on Wellington Street; the location along an arterial road; and, access to transit, and nearby commercial facilities (including Elgin Centre’s own commercial businesses), the subject lands are considered ideal for residential and/or commercial intensification from a land use planning perspective.

3.0 SPATIAL ANALYSIS & NEIGHBOURHOOD CHARACTER

Figure 4 illustrates the surrounding land uses as well as significant landmarks, within 400m and 800m radius in relation to the subject lands. These radii represent straight line walking distances of approximately five minutes (400m) and ten minutes (800m). Given the existing configuration of sidewalk networks, and other pedestrian barriers, the radii may not represent true walking times.

Figure 4 - Surrounding Context & Spatial Analysis (Subject Lands Outlined in Red)



The subject lands are located along a major arterial road (Wellington Street) while also fronting a major collector road (Highview Drive). Wellington Street has two westbound lanes of traffic and two eastbound lanes of traffic (including a dedicated left turn lane to the subject lands). Highview Drive has one lane in each direction for both the north/south and east/west segments.

Areas within 400m are currently dominated by low-, medium-, and high-density residential uses, and open space (Optimist Park). Low-density residential uses in the form of single-detached dwellings are located primarily west and north of the subject lands, with these forms continuing beyond 400m in all directions. Medium-density residential uses in the form of cluster townhouses are located directly to the west and east, while multiplex dwellings are located across Highview Drive to the northwest, and low-rise apartment buildings are located across Wellington Street to the south. High-density residential uses in the form of mid-rise apartment buildings are also located across Wellington Road to the south.

Areas within 800m are characterized by a broad mix of land uses. Commercial uses within this radius include large-format retail, grocery, entertainment, restaurants, and service-oriented uses

along Talbot Street and Wellington Street, supported by surrounding mixed-use development. Employment lands are located primarily to the north and northeast of the subject lands, accommodating light industrial employment uses and large commercial uses. Residential uses within the 800m radius range from low-density, single-detached dwellings to medium- and high-density forms, including townhouses and low- to mid-rise apartment buildings, particularly to the south and west of the subject lands. Institutional uses, including schools, places of worship, childcare facilities, and long-term care facilities, are distributed throughout the area, alongside open space and recreational amenities such as Optimist Park, Joe Thornton Community Centre, and nearby neighbourhood parks. Overall, the 800m radius reflects a complete and well-established urban area with a diverse mix of residential, commercial, employment, institutional, and open space uses.

Low-density residential uses in the form of single detached dwellings are located north and northeast of the subject lands across Highview Drive (Figure 5). Residential uses in the form of multiplex dwellings are located east of the subject lands on Manor Road (Figure 6 and Figure 7). St. Thomas Smart Centre plaza located northwest of the subject lands contains many commercial amenities that provide basic needs and resources to the community, including grocery stores such as Walmart and Real Canadian Superstore, and medical facilities such as Railway City Family Dental, First Optometry, and Walmart Pharmacy.

Figure 5 – Single-detached dwellings directly north of the subject lands (310 & 312 Highview Drive)



Figure 6 – Multiplex medium-density residential dwellings use to the east of the subject lands (342 Manor Road)



Figure 7 – High-density residential use to the south of the subject lands (330 Manor Road)



In summary, lands within a 400m radius (approximately a 5-minute walk) are predominantly comprised of commercial and residential uses, primarily in the form of medium- to high-density dwellings. Lands within an 800m radius (approximately a 10-minute walk) are generally similar in character, but also include low-density residential dwellings, employment and industrial uses, as well as open space areas. Active transportation infrastructure connects residential, commercial, recreational, and institutional uses within walking distance and provides linkages throughout the City of St. Thomas.

3.1 Site-Specific Spatial Analysis

Figure 8 below shows the relationship between the subject lands and abutting uses. The prominent frontage of the subject lands, shown in pink, is located along Wellington Street (Major Arterial Road). This is the most active interface with the public realm.

Figure 8 – Site Specific Spatial Analysis



Medium-density residential uses, in the form of vary forms of residential dwellings, interface the subject lands in all directions (shown with yellow dashed lines), while low-density residential uses, in the form of single-detached dwellings, are located to the north and west of the subject lands (shown with blue dashed lines). High-density residential uses interface the subject lands to the south, across Wellington Street (shown with red dashed lines). A community facility (St. Thomas Christian Church) is located to the east of the subject lands (shown with a purple dashed line).

The streetscape along Wellington Street, being the primary public interface, is generally auto-oriented and a high-traffic area. The streetscape along Highview Drive is defined by the residential uses that surround the subject lands. The public realm of Wellington Street is characterized by building setbacks ranging from approximately 27m to 35m from the southern lot line, wide sidewalks on both sides of the street, parking areas, hydro poles, overhead hydro lines, medium-sized street trees, and minimal landscaping. The streetscape along Highview Drive is similarly characterized with building setbacks approximately 23m from the northerly lot line, sidewalks on both sides of the street, hydro poles, overhead hydro lines, medium-sized street trees, and minimal landscaping.

Lands interfacing with the Wellington Street frontage, and the southwest portion of the subject lands are not regarded as particularly sensitive uses. Similarly, the interface with the St. Thomas Christian Church is not regarded as sensitive.

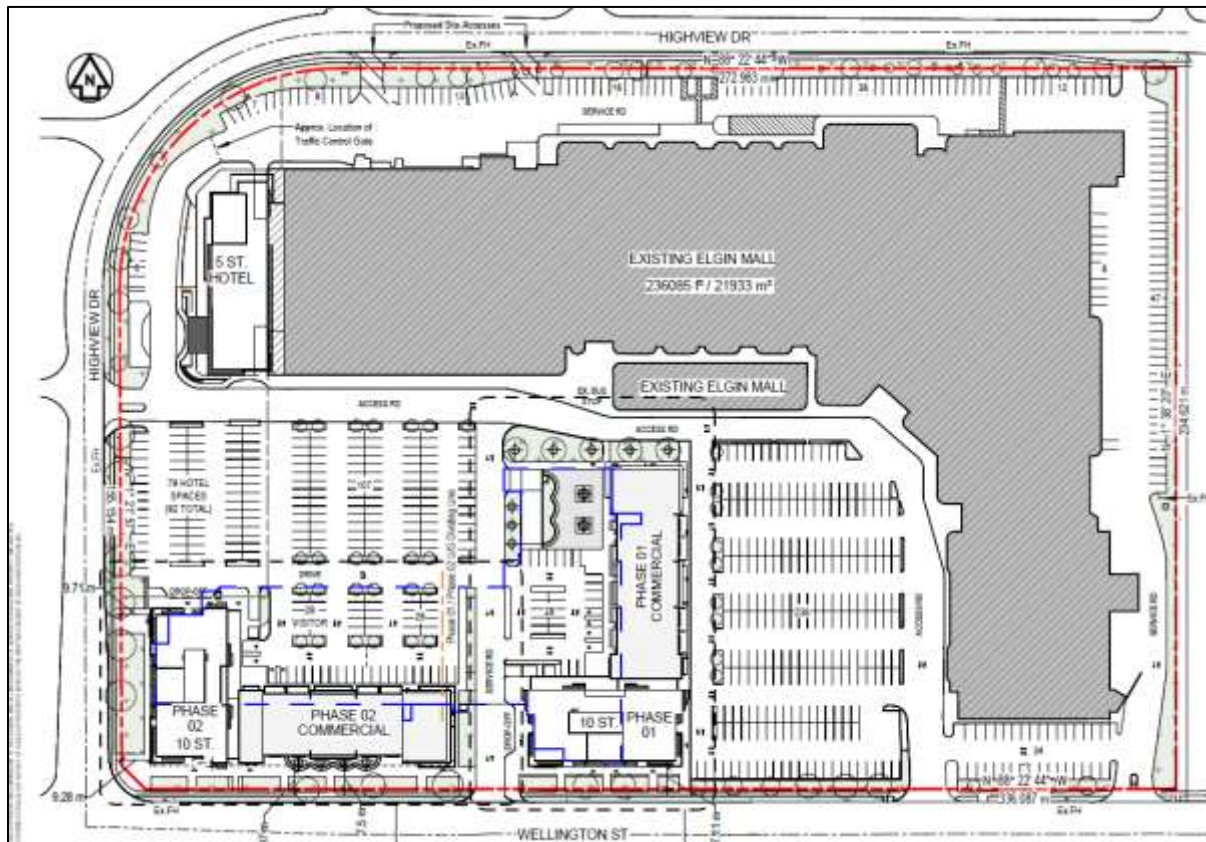
4.0 PROPOSED DEVELOPMENT

The southwest portion of the subject lands is proposed to be redeveloped for two new 10-storey mixed-use buildings providing a total of 232 residential units and a total of 3,860m² of new gross leasable commercial floor area in the form of 1-storey commercial buildings along with associated surface parking and amenity space (Figure 9 and 10). The existing mall and hotel on the property are proposed to remain unchanged.

Figure 9 – Rendering from the Intersection of Wellington Street and Highview Avenue looking northeast



Figure 10 – Proposed Site Plan (excerpt)



The proposed development is planned to be built out in two phases and will require the removal of one building (existing Denny's). The buildings in Phase 1 and 2 have been positioned in a way to address the intersection and provide for a prominent built form to act as a gateway to the mall. The buildings have facades on both Wellington Street and Highview Avenue to address Urban Design Guidelines which are noted later in this report.

Phase 1 will consist of a 10-storey, mixed-use building centrally located on the subject lands and labelled Phase 01 on Figure 10 above. This phase will consist of 116 residential units and the first floor will consist primarily of commercial uses and amenity space and floors 2 through 10 consist of solely residential units. A 1-storey commercial building is also proposed. A total of 1,930m² commercial floor area is being proposed through Phase 1. An inviting courtyard is located north west of the building, adjacent the 1-storey commercial building, to provide for patios and sitting areas within the subject lands. Phase 1 is proposed to be built out first with 128 associated residential parking spaces, in addition to parking provided for the existing mall and proposed commercial (589 spaces) and hotel (92 spaces).

Phase 2 will consist of a 10-storey, mixed use building located closer to the intersection of Wellington Street and Highview Drive on the subject lands and labelled Phase 02 on Figure 10 above. This phase will also consist of 116 residential units. A 1-storey commercial building is also

proposed. A total of 1,930m² commercial floor area is being proposed through Phase 2. There is a courtyard located along Wellington Street in front of the commercial building for Phase 2 which will provide for a pedestrian friendly transition between the commercial built form and the public sidewalk that makes for an inviting space. Phase 2 will also provide a total of 128 parking spaces but is oriented to address the corner location on the site. Phase 2 is intended to provide a highly-visible corner feature at the intersection of Wellington Street and Highview Drive. Phase 1 and Phase 2 are to be connected via a common underground parking garage.

The phasing strategy allows each phase to function independently while contributing to a cohesive overall development. Through the overall development, one existing driveway access is proposed to be removed, which will result in three vehicular entrances on Wellington Street and three on Highview Drive. Parking is proposed as follows:

Holiday Inn Express Hotel = 92 spaces

Elgin Centre Mall and new proposed commercial uses = 589 spaces

Phase 1 = 128 residential (Figure 11)

Phase 2 = 128 residential (Figure 12)

After full build out, the subject lands will provide a total of 937 parking spaces including barrier free spaces and visitor spaces, which will be generally shared between all uses.

Figure 11 – Phase 1 Plan

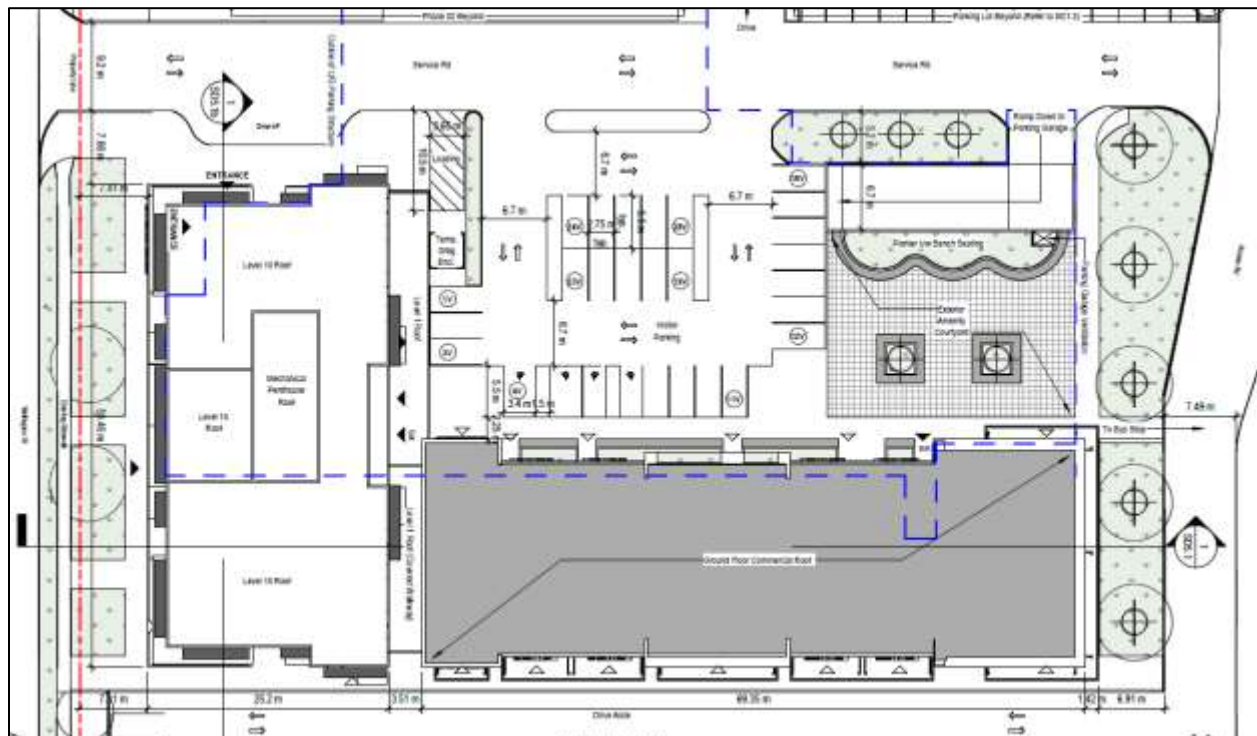
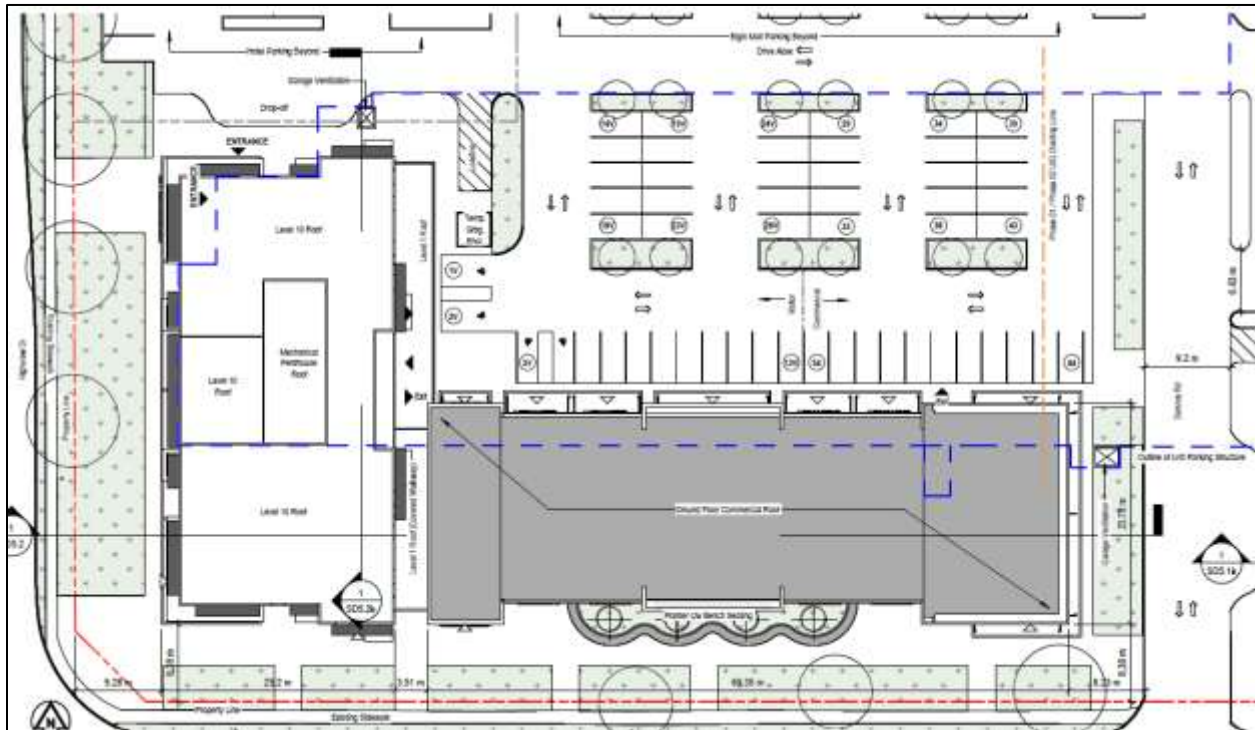
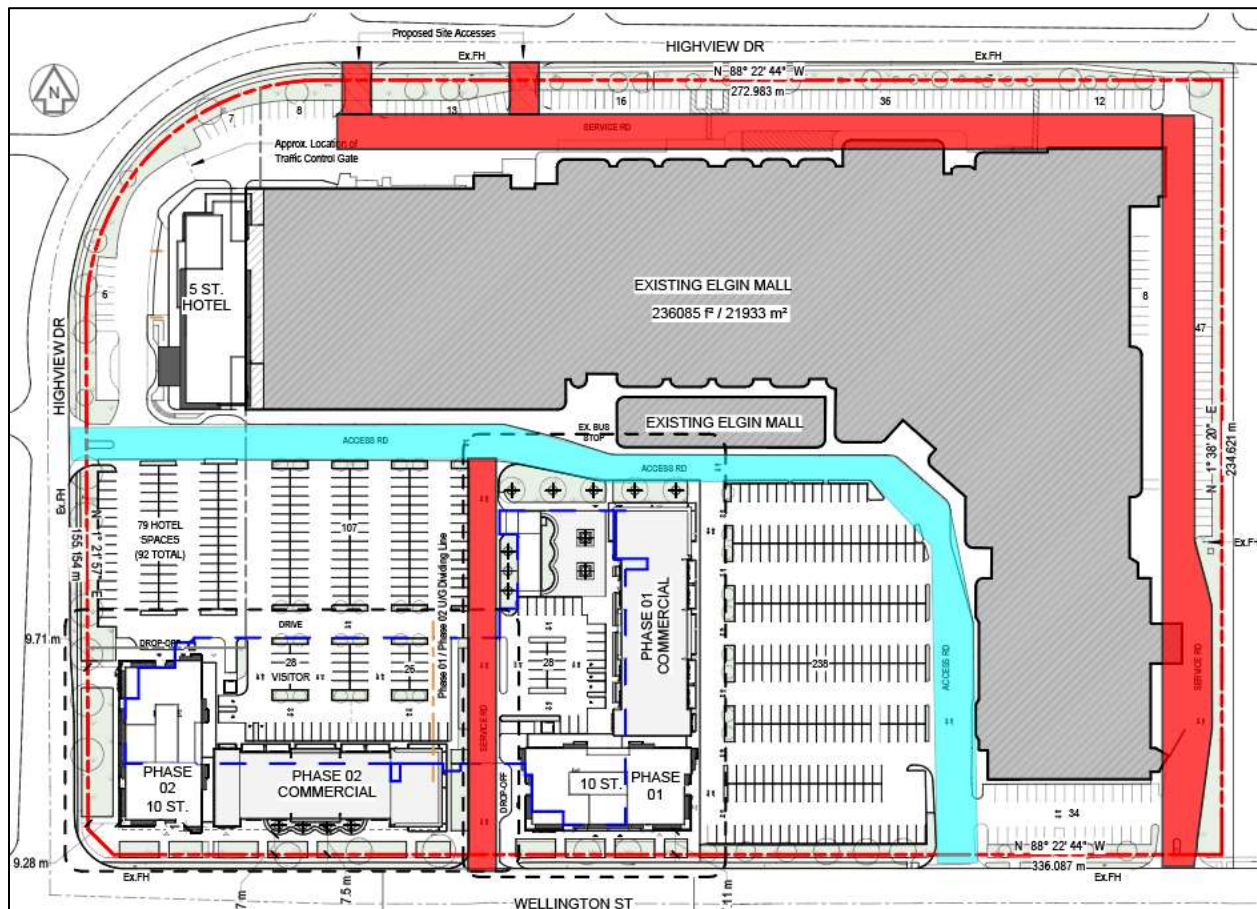


Figure 12 – Phase 2 Floor Plan



Site access is facilitated by an existing service road, which wraps around the north and east side of the mall building, while two new site entrances are proposed along Highview Drive to the north connected to this service road, these are shown in red on Figure 13. One additional service road is proposed through this development which is centrally located between Phase 1 and Phase 2 and will be constructed as part of Phase 1, this is also shown in red on Figure 13. The main access road through this development has a connection to both Highview Drive and Wellington Street and is shown in cyan on Figure 13.

Figure 13 – Service and Access Roads



The proposed development is to be connected to existing municipal water and sanitary as detailed later in the Preliminary Servicing Report provided by Development Engineering (London) Limited.

A full set of elevations from all building facades; isometric views; varying renderings; a shadow study; floor plans; and, underground parking plans are provided in the architectural design package with this application submission for a more fulsome look at the designs for the proposed built form. Figure 14-17 on the following pages provide excerpts from this package to highlight primary perspectives and interfaces.

Figure 14 – Isometric view of the proposed building interface at a vehicular entrance along Wellington Street



Figure 15 - Proposed rendering to reflect overall vision for new development looking southwest



Figure 16 – Rendering of mixed-use building looking northeast from Wellington Street and Highview Drive intersection



Figure 17 – Rendering of interface between Phase 1 and Phase 2 and the existing development



4.1 Site and Development Summary

4.1.1 Site Information

Site Statistics

Current Land Use Designation	Major Commercial
Frontage	336.1 m
Depth	234.6 m
Area	7.96 ha (79,630 m ²)
Within Built Area Boundary	Yes

4.1.2 Development Proposal Summary

Proposal Statistics

Regulations	Shown on Plan (Phase 1&2)
Front Yard Depth (Wellington Street)	5 m
Rear Yard Depth	11 m
Height	10 storeys for residential and 1-storey for commercial
Residential Units Proposed	232
Residential Density (not including hotel)	29.1 UPH
Gross Leasable Floor Area (Commercial) (max.)	21,933 m ² (Mall) + 1,930m ² (Phase 01 Commercial) + 1,930m ² (Phase 02 Commercial) = 25,793 m ² (Total)
Gross Floor Area (Hotel)	1483m ² (bldg footprint x 5 Storeys) = 7,180m ²
Floor Space Index (FSI)	0.3 FSI (commercial GFA/lot area)
Parking Spaces – Hotel	92
Parking Spaces – Mall/Commercial	589
Parking Spaces – Residential Phase 01	128
Parking Spaces – Residential Phase 02	128
Parking spaces – Total	937
Bike Parking – Phase 01	54
Bike Parking – Phase 02	54
Bike Parking - Total	108

5.0 DESIGN GOALS AND OBJECTIVES

Given the surrounding built form and land use context, and the highly underutilized parking areas on the subject lands, the goal of the proposed development is to intensify underutilized lands in a manner that is compatible with the surrounding built forms; contribute to, and fulfill, the planned function of the subject lands; and, to provide visually attractive buildings, while recognizing the physical and spatial constraints of the subject lands. As such, the proposed development is intended to:

- Make efficient use of underutilized lands by introducing high-density residential development and commercial forms of development that are compatible with, and complementary to, surrounding existing and planned land uses, including nearby residential, commercial, and institutional uses;
- Provide a form and intensity of development that can function independently of abutting lands through appropriate site organization, access, servicing, and on-site amenity spaces, while maintaining compatibility with adjacent properties;
- Achieve an appropriate density that supports the efficient use of existing municipal services, infrastructure, transit, and transportation networks, consistent with growth management and intensification objectives;
- Incorporate a built form that is compatible with the surrounding context, through thoughtful massing, building orientation, setbacks, and articulation that mitigate visual and shadow impacts and contribute positively to the public realm;
- Provide building heights that do not conflict with aircraft flight paths associated with the St. Thomas Municipal Airport;
- Utilize high-quality building materials and architectural detailing to create a consistent and visually appealing development that enhances the streetscape and reflects the character of the surrounding area;
- Integrate with the existing land use policy framework, particularly with respect to height, scale, and built-form transitions, while supporting the planned function of the area as an appropriate location for residential intensification; and,
- Contribute to the creation of complete communities by providing a range of unit sizes and housing types that accommodate diverse household needs, including opportunities for aging in place, and support long-term residential stability.

6.0 DESIGN AND SITE COMPATIBILITY

6.1 Built Form & Massing

The proposed development presents a valuable opportunity to make efficient use of underutilized lands and positively contribute to the Wellington Street streetscape by enhancing the quality, functionality, and visual appeal of the subject lands and the adjacent public realm, while also supporting the planned function of the lands as set out in the Official Plan for the City of St. Thomas. In doing so, the development helps advance the City's housing objectives by introducing highly desirable residential opportunities in a well-located, serviced area.

The subject lands are significantly underutilized in their current form given their land use potential and policy context. Intensification on the subject lands provides an opportunity to improve and enhance the existing public realm by establishing a stronger built-form relationship to the street edges, and improving the integration of the lands into the surrounding urban fabric. The development layout provides a logical and highly visible connection between the public street and on-site parking areas. Surface parking areas and exterior amenity space are located internal to the site, effectively screened from public view.

The subject lands are contextually appropriate in terms of size and location for apartment and commercial development, given the property's location in an area with existing and developing medium-to-high density uses. The proposed 10-storey building height is generally compatible with nearby building heights in the surrounding area, is supportive of a human-scaled environment, and is a planned and expected built-form in the "*Major Commercial*" Land Use Designation. Thus, the proposed redevelopment is generally compatible and considered a good fit within its context.

The proposed buildings will enhance the character and quality of the streetscape/public realm through the provision of landscaped areas, pedestrian walkways, and an increased building height and visibility for passive surveillance of the surrounding area.

From a massing perspective, the development has been sensitively designed as to fit within its surroundings and to be compatible with the varying scales of built form in the area. Importantly, the 10-storey height is below the maximum permitted in the City's Airport Zoning, as to not conflict with aircraft movements. High-density and commercial developments are common and currently developing in the surrounding context of the subject lands. The use of contrasting materials helps to break up the massing, providing variation and visual interest on all facades. In this regard, the proposal represents an appropriately scaled built form that establishes a compatible relationship between the development, the public realm, and adjacent residential land uses.

6.2 Architectural Treatment, Character & Image

The proposed buildings are a mix of high rise mixed-use built form and low rise commercial built form. The architectural style incorporates a mix of building materials and a prominent amount of glazing to provide for inviting commercial spaces and prominent street presence. While the final

materials are still subject to refinement, it is anticipated that the selected colours shown on the provided elevations and renderings will be consistent with the surrounding area.

6.3 Public Realm

The public realm along Wellington Street is generally characterized by varying building setbacks; sidewalks on both sides of the street; privacy fencing for townhouses; commercial buildings, parking areas, hydro poles, overhead hydro lines, and mature trees with landscaped setbacks associated with adjacent residential buildings. The addition of mixed-use, residential and commercial development, in the form of apartments and retail shopping areas, with an entrance oriented towards the road will create an 'eyes-on-the-street' interface, enhancing the pedestrian experience in front of the building. The development will transform this section of Wellington Street from an auto-oriented streetscape with minimal walkability to a pedestrian-oriented streetscape with both commercial and residential uses directly interfacing with the street.

6.4 Shadow Study

A Shadow Impact Study was completed by Zedd Architecture in the architectural design package which depicts shadow effects during Spring (March), Summer (June) and Winter (December) during solstice and equinox events. Shadowing during the spring and summer are minimal and primarily only generate shadows on the subject lands by virtue of the location of the proposed buildings along the southerly lot line. During December, there is shadowing offsite to the west and northwest; however, this will only be during the winter months in the morning hours and will not cause any long-term undue impacts to surrounding properties.

7.0 PROPOSED ZONING BY-LAW AMENDMENT

The current "*Major Commercial (C4-6) and (C4-7)*" Zone permits all existing uses on the property in addition to a kennel as well as the proposed apartment dwellings and commercial uses. The subject lands are proposed to be rezoned through a Zoning By-Law Amendment to a site specific "*Major Commercial (C4-6(_)) and (C4-7)*" Zone with a special regulation as follows:

- To permit a maximum building height of 37.16m or the maximum permitted through the City of St. Thomas Airport Zoning By-law 36-2019, whichever is greater; and,

All permitted uses within the C4-6 and C4-7 would remain on the property.

8.0 PLANNING POLICY ANALYSIS

This section of the Planning Justification Report provides analysis evaluating the submitted Zoning By-Law Amendment through applicable land use policies, regulations, and guidelines, including the following:

- The Planning Act;
- 2024 Provincial Planning Statement (PPS 2024);
- The Official Plan for the City of St. Thomas;
- The City of St. Thomas Zoning By-Law 50-88; and,
- St. Thomas City Wide Urban Design Guidelines.

8.1 Planning Act, R.S.O. 1990

The Planning Act, R.S.O. 1990, provides provincial legislation that “sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them”

Section 2 of the Planning Act outlines matters of provincial interest that the council of a municipality, a planning board, and the Ontario Land Tribunal, shall have regard for in carrying out their responsibilities under the Act.

In considering a Zoning By-law Amendment application, the Planning Act states that regard shall be had for items in Section 34 which grants municipalities the authority to enact Zoning By-laws and provides the framework for approving amendments to these By-laws.

It is our professional opinion that the proposed development has consideration and is consistent with the above-noted provincial policies and is in the public interest, as detailed below in this report.

8.2 Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS 2024), issued under Section 3 of the *Planning Act*, “provides policy direction on matters of provincial interest related to land use planning and development.”

In accordance with Section 3 of the *Planning Act*, all decisions affecting land use planning matters shall be consistent with the PPS. The proposed development is consistent with the PPS for the reasons outlined below:

- The redevelopment of a portion of the subject lands promotes the creation of complete communities in the City of St. Thomas by adding to the variety of housing forms, improving accessibility, and, contributing to housing affordability by adding to the overall housing supply in the community (2.1.6 a, b, c);

- The proposed development is a form of housing that helps meet the social, health, and economic well-being requirements of current and future residents in the City of St. Thomas (2.2.1b. 1);
- The proposed development is a form of residential intensification in an established residential community, and, provides new housing options in a previously developed area (2.2.1b. 2);
- The proposed redevelopment provides for a more efficient use of the subject lands by locating new buildings on an underutilized parking lot (2.2.1c).
- The proposed development is transit-supportive by allowing a greater number of people to live near several St. Thomas transit routes through intensification (2.2.1d);
- The proposed development provides an appropriate form of intensification through the introduction of residential uses alongside existing and planned commercial uses on underutilized lands within the Elgin Centre. The mixed-use development introduces new housing options within a previously developed commercial area while maintaining commercial functions, resulting in a net increase in residential units (2.2.1.2);
- The intensification of the subject lands efficiently uses land and resources by providing a more intense form of development on lands which are currently used as a parking lot, and uses existing infrastructure and public services facilities; and, is transit supportive (2.3.2 a, b, d); and,
- The proposed development is a form of residential and commercial intensification and redevelopment which assists in the City's goal of achieving complete communities (2.3.1.4);

As demonstrated above, the proposed mixed-use form of development is consistent with the applicable policies of the PPS 2024.

8.3 The City of St. Thomas Official Plan

The subject lands are identified as being within the “*Major Commercial*” land use designation according to ‘*Schedule “A” – Land Use Plan*’ in the City of St. Thomas Official Plan (Figure 18), and fronts Wellington Street and Highview Drive, which are “*Major Arterial*” and “*Major Collector*”, road classifications on ‘*Schedule “B” – Roads Plan*’, respectively. Permitted uses under the “*Major Commercial*” land use designation include a range of commercial uses and contemplates mixed-use and stand-alone residential development. As discussed in this section, the proposed development generally conforms to the policies of Section 5.4.3.9 in the *City of St. Thomas Official Plan*.

Figure 18 - The Official Plan for the City of St. Thomas land use designation (excerpt – Subject Lands outlined in red)



Below is a table that provides all relevant policies and a response as to how the proposed development and Zoning By-law Amendment are consistent with the relevant Official Plan policies:

Policy	Response
<u>Policy 5.4.2: Goals – Major Commercial</u> <u>5.4.2</u> The Major Commercial land use designation adopts the following goals: i) To provide a variety of retail and personal service facilities in an attractive shopping environment; ii) To ensure development of the area is consistent with the retail needs of St. Thomas.	The proposed mixed-use development includes new commercial uses that contribute to a diverse range of retail and personal service opportunities a built up and commercial area of the City. The integration of these commercial uses with complementary residential development supports an active, well-used site and contributes to an attractive, functional shopping environment consistent with the intent of this policy. The proposed development maintains and enhances the commercial function of the site by providing additional commercial space in a location already designated for major commercial activity. By introducing compatible residential uses that support on-site and surrounding retail establishments, the development responds to the retail needs of the City of St. Thomas and aligns with the long-term vision for the <i>Major Commercial</i> designation. The notion of locating residential uses on the same lands as existing and future commercial uses also makes the economic viability of the Elgin Centre mall much stronger.
<u>Policies 5.4.3.1, 5.4.3.2 and 5.4.3.10: Permitted Uses</u> <u>5.4.3.1</u> Within the area designated "Major Commercial 11 on Schedule "A" the permitted use of land shall be for a shopping centre. A shopping centre is defined as a group of commercial establishments functioning as one unit with common parking facilities and access points. <u>5.4.3.2</u> The uses permitted in a shopping centre complex will be those uses which provide for the sale of convenience goods to meet the daily living needs in foods, drugs, sundries and personal services and may include department store type facilities, recreational uses, places of entertainment and offices. An automobile service station, including carwash facilities, where the station is designed and located as part of the overall shopping centre complex, may also be permitted. <u>5.4.3.10</u> 417 Wellington Street (OPA No. 95) A hotel as an additional permitted use on the lands numbered "95" and show enclosed in heavy solid line on Schedule "I" to this amendment. The development of the lands for a hotel use is subject to the following policies: i) The development is subject to site plan control. ii) An amendment to the zoning by-law is required.	The proposed Zoning By-law Amendment would permit a mixed-use development within the "Major Commercial" designation that continues to function as a comprehensive shopping centre and commercial hub on the subject lands with the addition of residential units. The proposed development maintains coordinated access and shared parking and supports the ongoing use of the site for commercial purposes, in keeping with the general intent and vision of the <i>Major Commercial</i> land use designation.
<u>5.4.3.4</u> Access to the shopping centre complex will be limited and designed so as to minimize the danger to vehicular and pedestrian traffic. Points of ingress and egress for the automobile service stations forming part of the shopping centre will be limited in number and so designed that a suitable landscaped area is provided between the automobile service station and all adjacent street lines.	One vehicular entrance on Wellington Street has been removed as a result of development in order to minimize potential risks. A Traffic Impact Study has also been prepared which supports the proposed development

5.4.3.5 Adequate buffer planting will be provided between the shopping centre and any abutting area designated "Residential".	The subject lands are primarily bound by public streets on the north, west and south side, and abut residentially designated lands on the east side. The current landscape buffer on the east side of the subject lands will remain, and may be enhanced through the Site Plan Approval process.
5.4.3.9 High density residential uses as part of a mixed-use development in the Major Commercial Designation may be considered on a site-by-site basis using the following criteria: i. compatibility with the general character of the area and, in particular, proximity effects upon adjacent uses, i.e. shadowing; ii. capacity of hard services to accommodate the proposed use(s); iii. proximity to public transit; iv. capacity of existing infrastructure services; v. availability of on-site parking; vi. proximity to education and community services and facilities.	The proposed development is compatible with the general character of this area of the City, which contains a mix of commercial and residential uses, including medium- and high-density residential built forms. Notably, the recent development of a Holiday Inn hotel on the northwest corner of the subject lands adds a compatible high-density form within the immediate context. As such, the proposed height and massing are consistent with the evolving character of the area. No undue adverse proximity impacts are anticipated given the building orientation, setbacks, and separation distances. A Shadow Impact Study has been prepared and submitted with this application which shows some shadow impacts on abutting properties in December. The proposal therefore maintains compatibility with surrounding uses. The proposed Zoning By-law Amendment will facilitate development on lands that are located within a fully serviced urban area and have access to existing municipal water, sanitary sewer, stormwater infrastructure, and established road networks. Detailed servicing matters will be addressed through the Site Plan Approval process. The proposed development is situated within a well-established urban area that is supported by existing infrastructure and community services. The surrounding road network, transit system, and municipal facilities currently serve a mix of commercial and medium- to high-density residential uses, demonstrating that the area is equipped to accommodate comparable forms of development. The proximity of transit stops, commercial services, and community amenities further supports the ability of existing infrastructure systems to absorb the proposed development. As such, the proposal represents an efficient use of lands within an area where infrastructure investment has already been made. The proposed development is located within an established transit-serviced area. Existing bus stops are situated on-site at the main mall entrances, along Wellington Street immediately adjacent to the subject lands, as well as approximately 100 metres from the intersection of Wellington Street and Highview Drive. An additional stop is located north of the subject lands along Highview Drive. A further stop is located approximately 200 metres east of the subject lands along Manor Road. The proposed development provides on-site parking through a combination of underground and surface parking. A total of 937 parking spaces are proposed as a result of final development. The total parking supply is sufficient to accommodate the needs of residents,

	visitors, and users of the proposed commercial space, thereby ensuring that on-site parking demand is adequately met. The subject lands are located within convenient walking distance of a range of community and institutional facilities, including Caressant Care, Meadow Housing Co-operative, Forest Park Elementary School, and SmartCentres St. Thomas. This proximity supports access to education, services, and daily needs, and reinforces the suitability of the site for residential intensification.
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Based on the above analysis, the proposed development and associated Zoning By-law Amendment is consistent with the relevant policies of the City of St. Thomas Official Plan and represents a land use that is compatible with surrounding existing development.

8.4 City of St. Thomas Zoning By-Law 50-88

The subject lands are currently zoned “Major Commercial (C4-6) and (C4-7)” in the City of St. Thomas Zoning By-Law 50-88 (Figure 19). The C4-7 zoning on the property was recent approved by Council (April 7th, 2026) to permit a kennel within the portion of the property that contains the mall.

Figure 19 - City of St. Thomas Zoning By-Law Mapping (Excerpt)



The C4-6 and C4-7 zone permits the following uses:

- Retail store;
- Business office;
- Personal service shop;
- Restaurant;
- Bakery;
- Shopping centre;
- Gas bar;
- Automatic car wash;
- Theatre;
- Entertainment centre;

- Outdoor sale of bushes, plants and flowers and related products;
- Kennel
- Accessory uses.
- Hotel;
- Apartment dwelling;

Apartment dwellings and a wide range of commercial uses are currently permitted on the subject lands. Despite the zoning permissions for apartment dwellings, a Zoning By-law Amendment is required to permit the height as proposed on the submitted site plan as the current regulations do not permit the proposed scale of development

The proposed Zoning By-law Amendment is to rezone the subject lands to a site-specific, special regulation “*Major Commercial (C4-6(_))*” zone while also maintaining the permissions of the C4-7 zone.

Table 1.1 (below) provides a breakdown of the standard regulations of the C4-6 Zone and the proposed regulations for the “*Major Commercial (C4-6(_))*” zone for the development of the subject lands. An asterisk (*) denotes a proposed site-specific zone regulation.

Table 1.1: Existing and proposed zoning regulations, and proposed concept plan statistics

Regulations	Required in the C4-6 Zone	Shown on Plan
Side Yard Depth (Wellington Street) (min.)	5 m	5 m (to be considered front yard depth)
Rear Yard Depth (min.)	11 m	11 m
Height (max.)	5-storeys	10 storeys
Residential Units Proposed	N/A	232
Residential Density (not including hotel)	N/A	29.1 UPH
Gross Leasable Floor Area (Commercial) (max.)	27,375m ²	21,933 m ² (Mall) + 1,930m ² (Phase 01 Commercial) + 1,930m ² (Phase 02 Commercial) = 25,793 m ² (Total)
Gross Floor Area (Hotel)	N/A	1483m ² (bldg footprint x 5 Storeys) = 7,180m ²
Floor Space Index (FSI)	N/A	0.3 FSI (commercial GFA/lot area)
Parking Spaces – Hotel (min.)	92	92
Parking Spaces - Mall	N/A	475
Parking Spaces – Commercial Phase 01	N/A	37

Parking Spaces – Residential Phase 01	N/A	128
Parking Spaces – Commercial Phase 02	N/A	37
Parking Spaces – Residential Phase 02	N/A	128
Parking spaces – Total (min.)	930	937

The site-specific development standards are to be confirmed and refined subject to a review of the application by Staff through the planning process.

The special regulation outlined in Table 1.1 is as follows:

- To permit a maximum building height of 37.16m or the maximum permitted through the City of St. Thomas Airport Zoning By-law 36-2019, whichever is greater.

The requested increase in building height of 45m above an elevation of 280.16m above sea level (ASL) equates to approximately a 10 storey building height, but is consistent with the Airport Zoning By-law which is noted below. The proposed height facilitates greater residential density within an area characterized by medium- to high-density development. The proposed building height is considered appropriate within the existing and planned context, and no negative implications related to shadowing, overlook, or streetscape compatibility are anticipated as a result of the requested height.

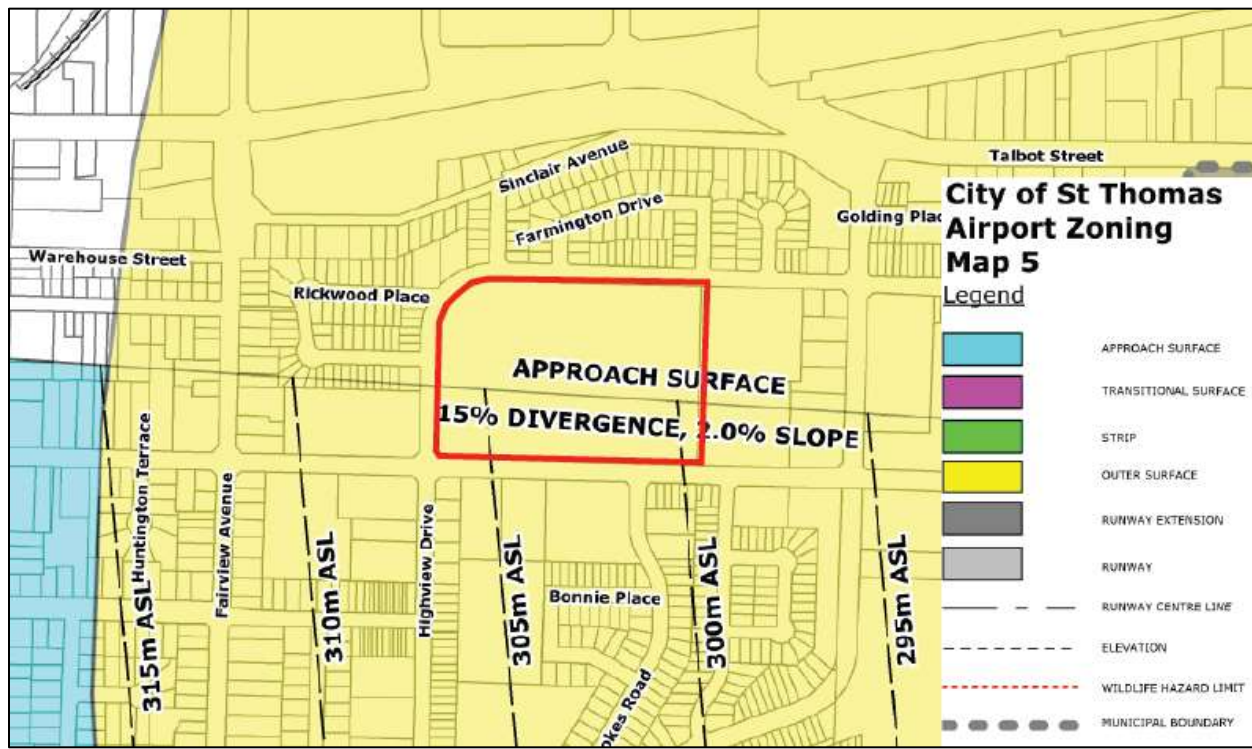
It is our view that the subject lands could otherwise accommodate taller buildings from a land use planning standpoint, but building height on the subject lands is limited by the Airport Zoning By-law “Outer Surface” Zone (By-law No. 29-2024), which caps building heights to 280.16m above sea level (ASL). As detailed in the next section of this report, the proposed development, at 10 storeys, maximizes the height permissions available on the subject lands while maintaining compatibility and safety with airport operations.

Overall, the requested “Major Commercial (C4-6(_))” zone is appropriate for the subject lands.

8.5 Airport Zoning Protection By-Law 36-2019

As the St. Thomas Municipal Airport is located proximate to the east of the subject lands, the subject lands are within the geographic area covered by the City’s Airport Zoning Protection By-Law. The purpose of this document is to ensure that new development is compatible with flight operations, including maintaining a safe vertical distance from any approach paths to airport runways. In the case of the subject lands, they are within the approach path of Runway 09, meaning aircraft landing on that runway would overfly the subject lands. Accordingly, the subject lands are within the 4000 m radius “Outer Surface” zone, according to Schedule “E”, to By-law 29-2024, which is an amendment to the Airport Zoning Protection By-law 36-2019 for the City of St. Thomas Airport (Figure 20).

Figure 20 – Subject lands are within the “Outer Surface” Zone in the City of St. Thomas Airport Zoning Map Index (subject lands outlined in red)



The “Outer Surface”, as shown in yellow on Figure 16 is conceptual circular-shaped surface with its centre located at each respective existing or future runway thresholds. This zone is situated at a constant elevation of 45 m above the Airport Reference Point, which itself has an elevation of 235.16m above sea level (ASL). The 45m height above the Airport Reference point equates to the “Outer Surface” plane having an elevation of 280.16m ASL. The by-law stipulates that no building can penetrate, or be higher than, the “Outer Surface” plane. Therefore, the total building height permitted under this by-law is determined by the surface elevation of any point in the “Outer Surface” area, and the maximum height of 280.16m ASL.

As the surface elevation of the subject lands is higher than the Airport Reference Point, the maximum height is less than the 45m noted above:

Average surface elevation of the subject lands: 243m

Maximum height of “Outer Plane”: 280.16m ASL

Maximum height permitted on subject lands: $280.16\text{m ASL} - 243\text{m} = 37.16\text{m}$

Given that the maximum building height proposed for the subject lands of 37.16m does not exceed the 45 m height of 280.16m ASL, the proposed development complies with the height requirements of the Airport Zoning Protection By-Law.

9.0 CITY OF ST. THOMAS CITY-WIDE URBAN DESIGN GUIDELINES

The purpose of the St. Thomas City-Wide Urban Design Guidelines (UDG) is to provide a city-wide design strategy and vision for future growth and changes in the urban environment.

The following guidelines, noted *in italics* below, are those from the UDG's that are relevant for the development. Responses of how these guidelines have been addressed by the proposed development is provided below each guideline:

1.3 Design Principles

The eight design principles listed below reflect current design best practices and principles, and are based on St. Thomas strategic directions and policies, providing high level direction on future development in the city.

1. *Place-Making: Engage in place-making by creating memorable, flexible, and identity-strengthening spaces in both the private and public realms of the city.*
2. *Human Scale within Urban Fabric: Create built environments (i.e., building massing, scale, details) that support comfortable, desirable, and active lifestyle and pedestrian experience, while complementing the character of the existing urban fabric.*
3. *Safe, Attractive and Green Streetscapes: Create vibrant, well-designed, safe, and pedestrian-oriented streets that support mobility for cyclists, pedestrians, and vehicles. Additionally, promote higher quality landscape treatments that integrate the benefits of climate comfort, stormwater management, urban forestry, and urban ecology.*
4. *High Quality Materials and Building Design: Promote high quality features, materials, and colours that enhance the neighbourhood and streetscape character, for both residential and commercial developments. Promote urban forms and architectural design that bring interest and diversity to the public realm.*
5. *Sustainable Development: Promote sustainability at all levels of city-building through urban design: green infrastructure; green building practices; climate change resiliency; active transportation, renewable and low-carbon energy and design initiatives; native plants; and material selections.*
6. *Heritage Preservation, Sensitive Integration: Protect and celebrate St. Thomas' cultural heritage resources and rail history and promote adaptive re-use of existing historic built form. Ensure new commercial and residential developments successfully contribute to the streetscape, landscape and district/site historic values and character.*
7. *Natural Heritage: Promote protection, enhancement, views, and education on St. Thomas' rich natural heritage system.*
8. *Accessibility/Universal Design: Provide designed spaces that reinforce inclusivity and allow users of all abilities to access, navigate, interact, and explore without physical and perceived barriers.*

Response: The proposed development is located at an intersection with two high order streets, Highview Drive and Wellington Street, at a highly-visible location, and introduces a new built form close to the street. This positioning provides a more building- and pedestrian-oriented streetscape

with parking behind the buildings, interior to the site. The proposed design supports place-making and huma-scale development by fostering a more walkable, welcoming, and active public realm characterized by front doors and windows facing the street. Elements such as commercial signage, ground floor commercial uses, and direct sidewalk connections from the public realm into the site contribute to safe, engaging streetscapes and a high quality of built form. The subject lands do not contain natural heritage or cultural heritage features and the development has been thoughtfully designed to support accessibility and an aging community with accessible parking, ramps and accessible residential and commercial units.

2.3 Mixed Use and Residential Areas

As St. Thomas experiences urban expansion to accommodate its rapid growth, its new mixed use and greenfield residential areas need more careful planning and design guidance to achieve the design vision, principles and priorities discussed in Sections 1.3...

Response: While the subject lands are not identified as a “Mixed Use” area in the Official Plan, the principles in Section 1.3 have been addressed and the proposed development has considered a carefully curated design standard for Phase 1 and 2 of this development.

4.2.2 Building and Massing

1. All new buildings should positively enhance and contribute to the character of the existing streetscape, cultural heritage district, cultural heritage landscape and/or historic area.

Response: The streetscape proposed through this development will be vastly improved with more walkable and welcoming ground floor commercial uses which can be accessed directly from the parking lot and public sidewalk. The proposal also locates buildings close to the street for a more visually appealing streetscape. Overall, this section of Wellington Street will be transformed from an auto-oriented streetscape with very little pedestrian amenity to a pedestrian-friendly streetscape providing a welcoming environment and visually appealing site.

2. Architectural variety is encouraged, while still maintaining a cohesive and harmonious streetscape.

Response: A detailed architectural design package is provided with this submission to outline the careful consideration for built form and design of the proposed buildings and the proposed Site Plan illustrates how the new buildings are able to interact with the existing built form on the subject lands with shared parking and drive aisles. The proposed buildings, designed by Zedd Architecture, provide a contemporary architectural look that, while quite different than the existing architectural styles in the area, will be a high-quality addition to the site.

3. The design of additions, alterations or new construction having sidewalls exposed to the public realm should include massing, roof lines, apertures, detailing and materials that complement the design of the front of the building and contribute to the visual interest of the street.

Response: The renderings and perspective images provided with this application detail the exterior building detailing and materials proposed for this development to constitute to the visual interest along the street. The proposed buildings will provide vastly more visual interest than the current parking and small restaurant pad currently located at this intersection. While this detail will be further refined at the Site Plan Approval application stage, careful consideration has been put into the curated design of this submission.

Notably, a section of the building fronting Wellington Street does not provide windows or entrances facing the street due to the interior program of the building. Instead, the development shows a landscaped feature providing visual interest and an inviting pedestrian area, rather than a blank wall.

4. Alterations and renovations to a building should be consistent with the form, massing and heights of adjacent buildings.

Response: No alterations to existing building are proposed. Elgin Centre Mall will remain as existing and one building, the Denny's restaurant, will be removed and replaced in Phase 2.

5. Where new development is fewer storeys in height than the adjacent buildings, methods to increase its height should be considered such as, increasing the floor-to-floor height of each storey or introducing a tall parapet with a strong cornice line.

Response: The proposed development will be taller than buildings in the immediate area, not shorter. The proposed single-storey portions of the new development, being the commercial buildings, will remain in keeping with the single-storey portions of the site.

6. Mixed use developments should locate active uses such as retail, service shops and restaurants at the street level to encourage pedestrian activity, create visual interest, and heighten interaction between internal spaces and the public realm. Residential or office spaces should be located above street level or to the rear.

Response: Active commercial frontages are proposed along Wellington Street and Highview Drive, improving the current conditions of these streets to a more pedestrian scale environment. Residential uses are located above street level.

7. Building facades for development with over 4 storeys should incorporate architectural elements that break up the massing and provide visual interest, such as windows, doors, and balconies.

Response: Varying architectural details are provided to break up the massing and provide visual interest for the proposed buildings in the form of balconies and glazing as shown in the provided renderings.

8. Development should respect the architectural scale, proportion, rhythm and character of existing designated heritage building, and or/ heritage conservation district.

Response: The subject lands do not contain any designated heritage building, and are not located within a heritage conservation district.

9. Abrupt changes in massing and height in new buildings should be carefully designed with building step backs that are compatible with the adjacent heights of buildings, larger side setbacks, and micro-climate considerations to minimize impacts.

Response: While the new 10-storey buildings provide a significant increase in building height on the subject lands, their overall height is not particularly tall. Nonetheless, a number of design elements are included in the current concept to ensure compatibility and variation in massing, including projecting balconies, pushed and pulled sections of the building elevations, and distinct architectural features identifying the top of the building.

10. Corner buildings should address both street frontages.

Response: As shown in the renderings provided, both phases directly address Wellington Street and Highview Drive with windows and active building entrances.

11. Consider the use of locally sourced materials to reinforce the connection to the community and support sustainable building practices.

Response: This will be a consideration at the time of construction.

12. High quality materials and design should be a key consideration for architectural design.

Response: High quality materials have been identified in the architectural package included in this application. Materials will be refined through the Site Plan Approval process.

13. Commercial building and mixed-use buildings exceeding 6 storeys in high rise forms should have a massing composed of a podium, middle and top.

Response: The proposed buildings show distinct podium, middle, and top elements as follows:

Podium: The ground floor of each building is a taller height accounting for vertical window elements and ground floor commercial uses. The commercial uses function as a base/podium for the main residential component of the apartment buildings above.

Middle: Floors 2-8 of each apartment building show a distinct, consistent middle.

Top: Floors 9 and 10 provide an architectural step-back and change in colouring and dividing materials (e.g. no balcony divider) to clearly denote these floors as the top of each building.

14. Commercial building and mixed-use buildings above 2 or 3 storeys, depending on the adjacent building heights, should incorporate a minimum step-back of 1.5 metres between the floors to ensure the appropriate scale and massing of the building.

Response: Commercial buildings in this proposal are 1-storey in height.

15. Where a building site abuts a low-density residential area, a transitional 45-degree angular plane should be applied at the shared property line, to ensure that the impacts of height, overlook and shadow are mitigated.

Response: The proposed buildings do not abut low-density residential lands.

16. Where a building site abuts a medium density residential area, a transitional 45-degree angular plane should be applied beginning 10.5 metres above average grade at the required minimum setback, to ensure that the impacts of height, overlook and shadow are mitigated.

Response: Only Phase 2 is located adjacent (not abutting) a medium-density residential area located on the west side of Highview Drive. The building is set back 32m from the lot line on the west side of Highview Drive (23m ROW + 9m building setback), thereby being well below the 45-degree plane noted above.

4.2.3 Landscape Design

1. Planting should be an integral piece of the site design and be developed to unify and enhance the overall site design.

Response: Conceptual plantings are shown in the architectural design package to outline space available for plantings. A detailed landscape plan will be provided at the time of a Site plan Approval application to outline specific details.

2. High quality, durable and diverse landscape elements are encouraged.

Response: Conceptual plantings are shown in the architectural design package to outline space available for plantings. A detailed landscape plan will be provided at the time of a Site plan Approval application to outline specific details.

3. Native drought tolerant plant materials should be used, wherever possible.

Response: Specific species being planted for this proposal have not yet been established at this stage. A detailed landscape plan will be provided at the time of a Site plan Approval application to outline specific details.

4. Landscaping should support and define a consistent and attractive street edge.

Response: Several of the existing perimeter landscaping will remain as in on the property, with new landscaping proposed where the new buildings are located to support an attractive streetscape along Wellington Street and Highview Drive.

5. Selection and spacing of all plantings should relate to the street type and adjacent land use and site conditions.

Response: Specific details for species and planting locations will be refined through the Site Plan Approval process.

6. Landscape buffers should be encouraged along surface parking lots adjacent to public streets to soften and screen parking lot edges.

Response: Parking will largely be screened by the proposed buildings themselves. Additional landscaping features are proposed within the site to soften the parking areas.

7. Existing significant trees, tree stands, and vegetation should be protected and incorporated into site design and landscaping.

Response: There are no significant trees or significant vegetation on the subject lands.

8. Environmentally sensitive planting schemes utilizing native species should be provided at the interface with watercourses and natural heritage areas.

Response: No watercourses or natural heritage areas are present on the subject lands.

9. Landscape design should incorporate a wide range of strategies to minimize water consumption, e.g., native species, use of mulches and compost, alternatives to grass, rainwater collection systems.

Response: A detailed landscape plan will be provided at the time of a Site plan Approval application to outline specific details of landscaping strategies to support this.

10. The width of all planting beds should be at least 2.5 metre-wide to enable plant material to be massed to create a healthy and sustainable landscape.

Response: The guideline is acknowledged and will be detailed in a Landscape Plan provided at the time of Site Plan Approval.

11. Permeable alternatives, such as permeable pavers, porous asphalt, or pervious concrete, should be encouraged and integrated into the landscape design.

Response: Due to the nature of this development, no permeable materials are being considered for hard surface areas.

4.3.4 Mixed-Use

4.3.4.1 Site Design

1. Mixed use buildings should include, where feasible, active frontages with street-related, publicly accessible shops, services, and amenities adjacent to areas of high pedestrian circulation.

Response: The proposed development proposes active commercial frontages along Wellington Street and Highview Drive and improve the current conditions of these streets to a more pedestrian-scale environment.

2. Setback measurements should vary depending on the scale and size of the street; at minimum, setbacks for mixed-use developments should have enough space for modest spill-out uses such as restaurant, cafe patios, waiting areas, planters, etc.

Response: Reasonable setbacks of 7m to 9m are proposed along Wellington Street and Highview Drive, sufficient to accommodate spill-out patios and pedestrian areas.

3. In HCD areas, setbacks should match the existing setbacks of established buildings.

Response: The subject lands are not located within a Heritage Conservation District

4. If a building includes residential uses at grade, they should be differentiated from any active or non-residential uses through additional setbacks.

Response: All residential units are proposed on the 2nd storey and higher, commercial uses are the only uses proposed on the ground floor.

4.3.4.2 Massing and Architectural Design

1. Commercial uses are encouraged at the ground level and should have individual unit entrances accessed directly from the street; upper-level residential units – or office units, in the case of live/work buildings – may be accessed from a shared lobby entrance.

Response: Commercial uses are located on the ground floor of the mixed-use buildings and the 1-storey commercial buildings with individual unit entrances are located around the buildings as shown on the provided Site Plan.

2. Ground floors should be a minimum of 4.5 meters in height and building systems should be designed to accommodate a range of uses over time, unless a continuous street wall has already been established, new buildings should align with existing ground floor height and design.

Response: The at grade commercial will be designed with commercial standards and operations in mind with building heights of at least 4.5m. This height may require slight amendments to ensure compliance with the Airport Zoning as more detailed survey and grading information is provided through the SPA process.

3. Building entrances should avoid grade changes from the public sidewalk to ensure that grade level retail, office and commercial units and upper-level residential units can be accessed by all.

Response: Building entrances are proposed to be accessible and will be detailed further through a grading plan at the time of Site Plan Approval.

4. Fifty percent transparent glazing should be provided within the ground floor street facing facades of commercial spaces. Reflective or heavily tinted glazing should be avoided.

Response: A high degree of glazing is proposed on the ground floor or both commercial and residential spaces. The one section of building that does not provide a high degree of glazing instead provides a landscaped feature.

5. In HCD areas, shapes and massing should be used that are compatible with the historic building and create a harmonious look with the surrounding buildings.

Response: The subject lands are not located within a Heritage Conservation District.

6. Majority of vehicular parking should be provided underground, and surface parking should be limited to convenience parking at the rear of the building for retail uses.

Response: An appropriate mix of surface and underground parking is proposed through this develop to limit the amount of surface parking and still provide an appropriate number of surface spaces for commercial uses.

7. Private balconies should be provided for residential use on upper levels where there is adequate sunlight and opportunity for views into the City's natural heritage, landmarks or skyline.

Response: As shown in the provided renderings, private balconies are proposed on all sides of the 2nd-10th storeys of the mixed-use building for residential units.

8. Balconies should be inset within the primary façade.

Response: Balconies are inset where possible.

9. Common amenity spaces should provide multiple uses and functional spaces for people of all ages, including children. They should be designed to read as distinct from the public realm but accessible to all building residents; provide a combination of outdoor amenity spaces and indoor amenity areas.

Response: The common amenity spaces being implemented outside of the built form are shown primarily in proximity to the 1-storey commercial buildings in Phase 1 and Phase 2 of the proposal and are designed as shared spaces. Amenity spaces interior to the building will also have functional spaces for people of all ages.

Based on the above analysis, the proposed development and Zoning By-law Amendment have regard for the City of St. Thomas City Wide Urban Design Guidelines and provide for an appropriate built form that will support good urban design at a prominent location within the City.

10.0 SUPPORTING REPORTS, MATERIALS & PLANS

10.1 Public Consultation Strategy

It is proposed that the public consultation process for the proposed applications follow the statutory requirements as set forth in the *Planning Act*. The following procedure of public consultation is proposed:

- Adequate information and material, including a copy of the proposed development, to be made available to the public; and,
- A statutory public meeting be held for the purpose of giving the public an opportunity to make representations in respect of the proposed development.

10.2 Technical Studies

The proposed development and planning rationale is supported by the following technical reports:

10.2.1 Servicing and Stormwater Management Report and Servicing Plans

A Preliminary Servicing Report was prepared by Development Engineering (London) Limited in March 2026. The purpose of the report is to demonstrate an effective approach to address site

servicing, grading and Stormwater Management (SWM), for the proposed development, while conforming to City of St. Thomas and Provincial design guidelines.

The Preliminary Servicing Report concludes the following:

- The subject site is approximately ± 7.96 ha, currently consisting of a mall (± 2.57 ha), an attached five storey hotel (± 0.13 ha), a detached commercial building (Denny's) (± 0.04 ha), and the remaining space as parking area.
- The proposed development is to occur in two (2) phases, connected via a common underground parking garage.
- There are existing municipal watermain, storm sewers and sanitary sewers located along Wellington Street and Highview Drive.
- There are existing private storm sewers, sanitary sewers and watermain connections located within the subject lands, currently servicing the existing mall, attached 5-storey hotel and assumed servicing of the Denny's building. The private services are connected to the existing municipal services on Highview Drive.
- Proposed grading of the subject lands shall be conducted in a manner that directs storm runoff to the existing storm sewers, and generally follow existing drainage patterns where feasible. It is anticipated that the major overland flow route for a significant portion of the subject site will be blocked by the proposed Phase 2 building. Reallocation of these major flows around the Phase 2 building will need to be confirmed at the future Site Plan Approval application stage.
- For the purpose of this report, two (2) servicing options have been identified:
 - Providing new private service connections to the existing Municipal services on Wellington Street; OR,
 - Connecting internally to the existing on-site private services.
- The preferred water servicing alternative is to provide a new connection directly to the Municipal watermain on Wellington Street, which is anticipated to be suitably sized to accommodate the development's domestic and fire flow demands.
- The preferred sanitary servicing alternative is to provide a new connection directly to the Municipal sanitary sewer on Wellington Street, which is suitably deep to service the proposed development. A anticipated sanitary peak flow of 5.07 L/s has been calculated for the proposed development.
- There is no preferred alternative for storm servicing.
- No on-site stormwater quantity or quality control measures are anticipated to be required as the proposed development will result in a reduction to the overall site runoff and

proposes replacing existing parking lot areas with rooftops and landscaping which are considered "clean" for the purpose of quality control.

- Erosion and Sediment Control measures will be implemented to help mitigate potential sediment transport and erosion resulting from construction activities.

The conclusions of the Preliminary Servicing Report outline viable options for servicing the proposed development.

10.2.2 Traffic Impact Study

A Traffic Impact Study was prepared by RC Spencer Associates Inc in February 2026. The purpose of the report was to evaluate the proposed infill development and its potential impact on area traffic operations. Using turning movements counts from the surrounding 4 major intersections, an analysis was completed to measure the operational impact of all proposed new buildings on the subject lands. The Traffic Impact Study concluded that:

- The signal-controlled intersection of Highview Drive and Wellington Street is operating at a good level of service and even with additional traffic generated through this development, the intersection will continue to operate at a good level of service.
- The signal-controlled intersection of Stokes Road/mall access at Wellington Street is currently operating at a good level of service and even with additional traffic generated through this development, the intersection will continue to operate at a good level of service.
- The all-way stop controlled intersection of Manor Road and Highview Drive is currently operating at a good level of service and even with additional traffic generated through this development, the intersection will continue to operate at a good level of service.
- The roundabout-controlled intersection of Manor Road and Wellington Street is currently operating at a good level of service and even with additional traffic generated through this development, the intersection will continue to operate at a good level of service.
- Some modification may need to be made to facilitate safe egress from the proposed westerly service access because it is close to the curve in Highview Drive. This may be limited to "entry only" at the westerly access and "exit only" at the easterly access. This will be determined at the Site Plan stage for this development.

It is the opinion of the provided Traffic Impact Study that the proposed development on the subject lands will not adversely impact area traffic operations.

11.0 CONCLUSION

The proposed Zoning By-Law Amendment seeks to rezone the subject lands to permit two, 10-storey mixed use buildings, and two, 1-storey commercial buildings. The subject lands are appropriately located to accommodate increased density. The proposed site design is responsive

to abutting and adjacent land uses. The built form of the proposed development is appropriate for the subject lands and is compatible with existing and planned uses abutting the lands. The proposed buildings will enhance the pedestrian realm and visual appearance of the area, and the proposed range of residential unit types will assist in increasing housing options in the City, while helping to meet the needs and demands of the current housing market.

Based on the above, and as detailed throughout this Planning and Design Report, the proposed Zoning By-Law Amendment is consistent with the PPS 2024; conforms with the City of St. Thomas Official Plan; represents good planning practice; and, is in the public interest.