

PLANNING JUSTIFICATION **REPORT**

ZONING BY-LAW AMENDMENT AND
DRAFT PLAN OF SUBDIVISION APPLICATIONS

Sinclair Avenue Residential Subdivision
City of St. Thomas

Date:

April 2021

Prepared for:

TBR Land Developments Inc.

Prepared by:

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC)

630 Colborne Street, Suite 202

London ON N6B 2V2

T: 519 858 2797 x223

F: 519 858 2920

MHBC File: 20211'A'

CONTENTS

1.0

Introduction 4

1.1 Overview 4

1.2 Report Framework 5

1.3 Planning Applications 6

2.0

Site Location and Surrounding Land Uses 7

2.1 Site Description 7

2.2 Subject Lands and Surrounding Uses 7

3.0

Description of the Proposal 9

3.1 Proposed Draft Plan of Subdivision 9

4.0

Planning Analysis 11

4.1 Provincial Policy Statement 11

4.2 City of St. Thomas Official Plan 19

5.0	
Zoning By-law Analysis	25
5.1 Existing Zoning	25
5.2 Proposed Zoning	26
6.0	
Conclusions	28

LIST OF FIGURES

Figure 1:	General Location Map	Following 7
Figure 2:	Draft Plan of Subdivision	Following 10
Figure 3:	Existing Official Plan Designation (Schedule A)	Following 19
Figure 4:	Existing Zoning	Following 25
Figure 5:	Proposed Zoning	Following 27

LIST OF TABLES

Table 1.0:	Required Planning Applications	6
Table 2.0:	Surrounding Land Uses	8
Table 3.0:	Consistency with Provincial Policies (2020 PPS)	11

1.0

INTRODUCTION

1.1 Overview

MHBC has been retained by TBR Land Developments Inc. to assist with Draft Plan of Subdivision (Draft Plan) and Zoning By-law Amendment (ZBA) applications in support of a development plan for vacant lands fronting Sinclair Avenue and Talbot Street in the City of St. Thomas. The subject lands (Site) measure approximately 5.49 ha in area and have frontage on both the north side of Sinclair Avenue and the south side of Talbot Street.

Development Engineering (London) Limited (DevEng) has prepared a Draft Plan for the Site to achieve the following core project objectives:

- To establish a lotting pattern that is sensitive to, and compatible with, the existing development context;
- To align the design layout with the applicable planning policy framework and related planning initiatives; and
- To help promote a compact, efficient development that will support a mix of uses and housing choice in the local community.

As presented in this Report, the proposed Draft Plan incorporates two principal components:

1. A 1.07 ha low density residential development area comprised of 19 residential lots fronting the western portion of the Sinclair Avenue frontage and a 0.03 ha open space block. The proposed lots are intended for single detached dwellings. This project component represents 'Phase 1' of the site development plan; and
2. A 4.39 ha future development block integrating frontage along the south side of Talbot Street and the eastern portion of the Sinclair Avenue frontage. It is anticipated that this block would be ultimately developed for a mix of commercial and multiple-unit

residential uses. Development of this block represents 'Phase 2' of the development plan for the Site.

An application to amend the City of St. Thomas Zoning By-law is also being advanced concurrently with the Draft Plan application, in order to permit this development proposal (referred to as the 'Sinclair Avenue Residential Subdivision').

The planning merits of this project are evaluated in detail within this Report and are summarized as follows:

- The subject lands are located within the Settlement Area of the City of St Thomas and are designated for residential and commercial purposes pursuant to the City's Official Plan;
- The property is well suited for a mix of residential and commercial uses, given its physical characteristics, its location relative to the Talbot Street corridor, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, the mix of uses being considered for the Site would support the diversification, intensification and overall vitality of the local community;
- The orientation and configuration of the proposed single detached residential lots is intended: to be compatible with surrounding land uses; to complement the local development context; and to promote compact, efficient development;
- Preliminary assessments indicate that adequate road and servicing infrastructure is available within the Sinclair Avenue corridor to accommodate the proposed development; and
- In our opinion, the Draft Plan proposal is consistent with the Provincial Policy Statement and conforms to the St. Thomas Official Plan.

In light of these considerations, it is our opinion that this proposal is appropriate for the Site and the local development context, and should not generate significant land use conflicts with adjacent properties.

1.2 Report Framework

This Planning Justification Report has been prepared for submission to the City of St. Thomas in support of the required Draft Plan and ZBA applications. This Report includes the following primary components:

- An introduction and general description of the subject lands, surrounding uses and existing conditions to provide an understanding of the locational context;
- An assessment of the proposal relative to the framework of planning policies and development regulations applicable to the Site. The following planning documents were primary references for our analysis:
 - Provincial Policy Statement;
 - City of St. Thomas Official Plan; and
 - City of St. Thomas Zoning By-law No. 74-2018.

1.3 Planning Applications

Our analysis has confirmed that the following applications are required to permit the proposed Draft Plan:

Table 1.0 – Required Planning Applications

Planning Application	Approval Authority
Draft Plan of Subdivision To create 19 lots intended for single-detached residential development and a future development block intended for a mix of commercial uses and multiple-unit residential forms.	City of St. Thomas
Zoning By-law Amendment To amend the existing Second Residential – Special Zone (R2-1) to implement the Draft Plan layout.	City St. Thomas

A Pre-Application Consultation meeting was held on or about June 4, 2020 with City of St. Thomas staff to review the submission requirements for the proposed Draft Plan. In accordance with correspondence provided by City staff, dated July 15, 2020, the following reports have been prepared in support of the proposal and are enclosed with the planning applications:

- Planning Justification Report;
- Functional Servicing Brief;
- Geotechnical Investigation; and
- Traffic Impact Brief.

2.0

SITE LOCATION AND SURROUNDING LAND USES

2.1 Site Description

The subject property is located near the eastern limit of St. Thomas and is bounded by Talbot Street to the north, Manor Road to the east, Sinclair Avenue to the south and Fairview Avenue to the west. These lands measure approximately 5.49 ha in area, have approximately 433 m of street frontage on Sinclair Avenue, approximately 723 m of street frontage on Talbot Street and have a typical depth of approximately 125 metres. The property is unaddressed and is described as follows:

Part of Lot 8 and 9, Concession 9 in the Township of Yarmouth, Original Road Allowance between Concessions 8 and 9, Lots 90 and 91 and Lot Canadian National Railway Registered Plan No. 209 in the City of St Thomas, County of Elgin (Roll No. 342104055014506).

The Site is currently vacant and encompasses a former railway corridor that generally bisects the property along an east-west orientation. **Figure 1** of this Report illustrates the general location of the subject lands.

2.2 Subject Lands and Surrounding Uses

The Site has an irregular shape and can be characterized as having limited topographic relief. As outlined in Table 2.0, this property is located in an established development area comprised of low density residential subdivisions to the south, commercial uses to the east and west and commercial/industrial activities to the north.

Adjacent to the Site, Schedule B (Roads Plan) of the City's Official Plan classifies Talbot Street and Manor Road as Major Arterial Roads, Fairview Avenue as a Major Arterial Road with Bike Lane and Sinclair Avenue as a Local Road. At this location, sidewalks are provided along

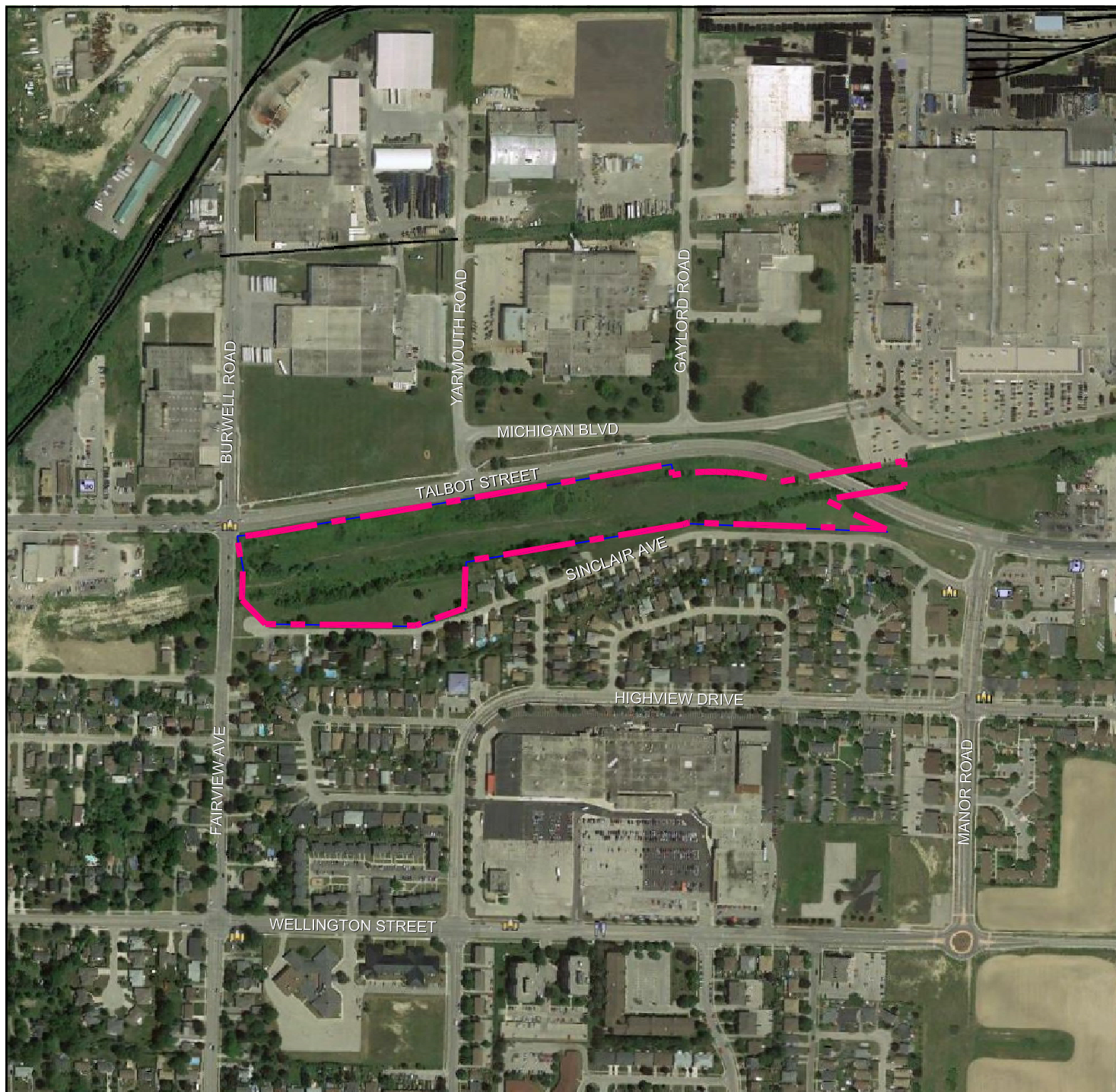


Figure 1
General
Location Map

 SUBJECT LANDS

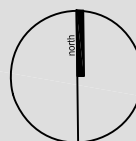


630 COLBORNE STREET,
SUITE #202
LONDON, ON, N6B 2V2
P: 519 858 2797 F: 519 858 2920
WWW.MHBCPLAN.COM

PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE
MHBC PLANNING

DATE: March 22, 2021

SCALE 1 : 2,500



P:\20211\A\Graphics\
Figure 1 - General Location Map - March 22, 2021

Talbot Street, Manor Road and Fairview Avenue and cycling routes are identified along Fairview Avenue and the western segment of Sinclair Avenue.

We understand that the subject lands do not contain any designated natural areas pursuant to the policies and schedules of the City of St. Thomas Official Plan. Further, this property is situated outside of the Kettle Creek Conservation Authority regulated area.

The following table provides additional details on surrounding land uses:

Table 2.0 - Surrounding Land Uses

Relative Location	Existing Land Uses
TO THE NORTH:	Talbot Street corridor; commercial/industrial uses;
TO THE EAST:	Low density residential, Manor Road corridor; service/retail commercial uses;
TO THE SOUTH:	Sinclair Avenue corridor; low density residential; shopping centre (Elgin Mall);
TO THE WEST:	Fairview Avenue corridor; low density residential; service/retail commercial uses.

The image below illustrates a perspective view of the Site north from Sinclair Avenue.



3.0

DESCRIPTION OF THE PROPOSAL

3.1 **Proposed Draft Plan of Subdivision**

As discussed, DevEng has prepared a Draft Plan for the Site to achieve the following core project objectives:

- To establish a lotting pattern that is sensitive to, and compatible with, the existing development context;
- To align the design layout with the applicable planning policy framework and related planning initiatives; and
- To help promote a compact, efficient development that will support a mix of uses and housing choice in the local community.

The Sinclair Avenue Residential Subdivision, as proposed, incorporates two principal components:

1. Lots 1 to 19: A 1.07 ha low density residential development area comprised of 19 residential lots fronting the western portion of the Sinclair Avenue frontage (equating to a residential density of approximately 18 units/ha). These lots are designed to accommodate single detached dwellings and to align with the Residential designation applied to this area pursuant to Schedule 'A' of the City's Official Plan (discussed in Section 4.2 of this Report). Lot frontages for these lots would range from approximately 11.0 m to 12.7 m, with lot areas ranging from approximately 332 m² to 752 m². Further, the lot configuration was designed with consideration for the existing locations of Entegrus transmission (hydro) poles situated on the north side of Sinclair Avenue;

2. Block 20: A 0.03 ha open space block located adjacent to Lot 1 and fronting Sinclair Avenue. This park block is intend for passive recreational activities; and
3. Block 21: A 4.39 ha future development block integrating frontage along the south side of Talbot Street and the eastern portion of the Sinclair Avenue frontage. It is anticipated that this block would be ultimately developed for a mix of commercial uses and multiple-unit housing forms.

Figure 2 of this Report illustrates the proposed Draft Plan layout prepared by DevEng.

DETAILS	No	REVISIONS	DATE
DRAWN BY: SD	1	DRAFT PLAN OF SUBMISSION SUBMISSION	JULY 1, 2022
CHECKED BY: SD			
CHECKED BY: CD			

TONY ROMANELLI
TBR LAND DEVELOPMENTS INC.

SURVEYOR'S CERTIFICATE

I HEREBY CERTIFY THAT THE BOUNDARIES OF THE LAND TO BE SUBDIVIDED, AS SHOWN ON THIS PLAN, AND THEIR RELATIONSHIP TO THE ADJACENT LANDS ARE ACCURATELY AND CORRECTLY SHOWN.

JUAN ZAPATA O.L.S.
AGM.

CONSULTANT

London Office
41 Adelaide St. N., Unit 71
(519) 672-8310

Paris Office
31 Mechanic St., Unit 301
(519) 442-1441

**development
engineering**
(London) Limited

CONSULTING CIVIL ENGINEERS

SCALE - 1:1000

10 0 20m

A horizontal scale bar with three segments. The first segment is labeled '10', the second '0', and the third '20m'. The bar is divided into smaller units, likely representing 100m and 200m segments.

Draft Plan of Subdivision

4.0

PLANNING ANALYSIS

The planning applications identified in Table 1.0 of this Report have been assessed in terms of applicable policies set out by the Province of Ontario and the City of St. Thomas. The following sections of this Report describing how, in our opinion, the proposal addresses relevant policies of the Provincial Policy Statement and the City of St. Thomas Official Plan.

4.1 Provincial Policy Statement (PPS 2020)

The current Provincial Policy Statement (PPS) was issued under Section 3 of the Planning Act and came into effect on May 1, 2020. The PPS provides overall policy direction on matters of provincial interest related to land use planning and development, and sets the policy foundation for regulating the development and use of land. Part IV of the PPS sets out that this policy instrument provides a vision for land use planning in Ontario that focuses growth within settlement areas, and encourages efficient development patterns to optimize the use of land, resources and public investment in infrastructure and public service facilities.

The proposed development plan has been evaluated with regard to the policy direction and provisions of the PPS. Based on this analysis, it is our opinion that specific policies in Section 1.0 (Building Strong Healthy Communities), Section 2.0 (Wise Use and Management of Resources) and Section 3.0 (Protecting Public Health and Safety) are particularly relevant to this proposal. Table 3.0 demonstrates how the proposed development is consistent with the identified policies.

Table 3.0 – Consistency with Provincial Policies (2020 PPS)

PPS Policy	Response
1.1.1 Healthy, livable and safe communities are sustained by:	The proposal promotes an efficient, mixed-use lot layout to support the long-term financial well-being of the Province of

PPS Policy	Response
a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term. b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs; c) avoiding development and land use patterns which may cause environmental or public health and safety concerns; e) promoting the integration of land use planning, growth management, transit supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs; g) ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs;	Ontario and the City of St. Thomas (in the form of increased property tax assessment and the optimization of existing infrastructure). Further, the residential population accommodated by this development would support the vitality of existing service/retail commercial businesses operating proximate to the Site. Economic benefits would also be derived from construction activities associated with site development. The subject property is located within the St. Thomas Settlement Area and is designated for a range of retail, service, office, institutional, and residential uses. Additionally, the Site is located within an established community containing a mix of low, medium and high density residential forms, retail/service commercial uses, a shopping centre, offices, schools, parks and pathways. The residential and commercial components of this proposal (1) would collectively support the diversification, intensification and vitality of the local community and (2) would complement the mix of land uses within the existing community. This project should not result in environmental or public health and safety concerns. A preliminary servicing review has been completed by DevEng, dated March 2021, to confirm (1) that the development can proceed in a cost-effective manner and (2) that the necessary servicing infrastructure is available to meet projected demands. Paradigm Transportation Solutions Limited (Paradigm) also completed a transportation

PPS Policy	Response
	review, dated March 2021, to confirm that the road network can accommodate the proposed development. Moreover, it is anticipated that public service facilities available in the vicinity of this property would accommodate the needs of residents and employees in Phase 2 of this project.
1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.	This proposal would support development of vacant lands located within the City's Settlement Area that are designated for residential and commercial purposes pursuant to the St. Thomas Official Plan (refer to Section 4.2 of this Report). This development would also help the City accommodate its forecasted population growth and achieve its projected housing requirements. Additionally, the residential types intended for Phase 1 of this proposal would be in keeping with the low density character of neighborhoods in the vicinity of Sinclair Avenue.
1.1.3.1 Settlement areas shall be the focus of growth and development.	The subject lands are situated within the City of St. Thomas Settlement Area and are therefore considered part of a settlement area, as defined by the PPS.
1.1.3.2 Land use patterns within settlement areas shall be based on densities and a mix of land uses which: a) efficiently use land and resources; b) are appropriate for and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; c) minimize negative impacts to air quality and climate change and promote energy efficiency; e) support active transportation;	This development proposal would help to promote the efficient use of the subject lands and available services. A preliminary servicing assessment has also been carried out by DevEng to confirm that adequate servicing capacity is available to accommodate the intended development. Additionally, Paradigm completed a transportation review to confirm that the road network can accommodate the proposed development. It is anticipated that future residents of this development would support existing public

PPS Policy	Response
f) are transit-supportive, where transit is planned, exists or may be developed;	service programs and facilities available in proximity to the Site. Where practical and appropriate, the project would incorporate sustainable development principles to help minimize environmental impacts. The proposed Draft Plan layout integrates with existing public facilities, including sidewalks, to encourage active transportation. The subject lands are also located within convenient walking distance of existing St Thomas Transit bus stops. Transit service from these locations provides connectivity to service/retail commercial areas, local schools, public institutions and recreational areas. In addition, the St. Thomas Transit recently completed a Transit Strategic Plan (February 2020) that sets out recommendations to enhance existing services in order to encourage ridership growth and promote efficient transit delivery. Development of the Site would help support both existing transit services and the objectives of planned transit improvements. Further, the City of St. Thomas has an active transportation network with sidewalks and cycling routes located within close proximity of the subject lands. These facilities provide linkages between the Site to a range of City Parks and hiking trails within Dalewood Conservation Area.
1.4.3 Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based affordable	Development of the Draft Plan would provide additional low density housing options in the community (Phase 1) and provide opportunities for future multi-

PPS Policy	Response
housing needs of current and future residents of the regional market area by: c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, infrastructure, and public services facilities, and support the use of active transportation and transit in areas where it exists or is to be developed.	residential development in conjunction with Phase 2. As discussed, this project would also help the City accommodate its forecasted population growth and achieve its projected housing requirements as identified in the City's Official Plan (refer to Section 4.2.3 of this Report). Preliminary studies have been completed to confirm that servicing infrastructure is available to meet projected needs. Additionally, it is anticipated that existing public service facilities available in the vicinity of the property would accommodate the projected demands of this development. This development plan would utilize existing land and servicing resources in an efficient manner and would be supported by the road transportation system, the active transportation network and transit services.
1.5.1 Healthy, active communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;	Phase 1 of the proposed Draft Plan layout integrates with existing public facilities, including sidewalks and convenient access to cycling routes and transit service, to encourage active transportation, social interaction and community connectivity. It is anticipated that Phase 2 would incorporate amenity spaces and walkway connections to also support this policy.
1.6.1 Infrastructure and public service facilities shall be provided in an efficient manner that prepares for the impacts of a changing climate while accommodating projected needs.	Preliminary servicing reviews have been carried out to confirm that the development can proceed in a cost-effective manner, and to ensure that necessary infrastructure is available to meet projected needs. As discussed, it is anticipated that the development can be accommodated by existing public service facilities.
1.6.7.2 Efficient use should be made of existing and planned infrastructure, including through the use of	The Site is located within walking distance of existing St. Thomas Transit service which provides connectivity throughout the City.

PPS Policy	Response
transportation demand management strategies, where feasible.	The subject lands are situated within a development area comprised of service/retail commercial uses, employment areas, offices, institutional uses (including schools) and neighbourhood parks. The Site's location relative to this mix of uses would help future residents, employees and patrons of this development minimize the length and frequency of vehicle trips. The Site's convenient access to St. Thomas Transit bus routes, sidewalks, bike routes and the City's pathway network would also support alternative transportation modes. Furthermore, the mix of uses anticipated for Phase 2 of site development would help to support existing and future investments in public transit.
16.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional boundaries.	
1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.	
1.7.1 Long term economic prosperity should be supported by: c) optimizing the long-term availability and use of land, resources, infrastructure, and public service facilities; f) promoting the redevelopment of brownfield sites;	The property is designated for residential and commercial development, and a similar mix of uses is proposed for the Site. Further, the proposed development has access to, and would help to optimize, the arterial road transportation network, transit services, municipal servicing infrastructure, active transportation infrastructure and public service facilities. Development of these lands for residential uses would also help to support the long-term vitality of existing service/retail commercial uses located proximate to the Site. Exp Services Inc. (EXP) conducted a Phase 1 Environmental Site Assessment (ESA), historical research and records review, for the Site. EXP has confirmed that based on a review of historical aerial photographs, historical maps, and other records review, the Site historically consisted of vacant land.

PPS Policy	Response
	The area directly north of the Site consisted of the former railway lands and some fill placement was evident, followed by an industrial complex (north of Talbot Street). West of the Site (west of Fairview Avenue) consisted of commercial properties including automotive, gasoline service stations and a dry cleaners. Based on the Phase I ESA historical research a Phase II ESA was recommended for the Site. The Phase I ESA research has been incorporated into the Phase II ESA report. Any remedial measures that may be required will be identified in the Phase II ESA Report.
1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which: a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion;	The proposed Draft Plan supports the efficient use of designated commercial and residential lands fronting an arterial road corridor, and connected via active transportation and public transit facilities to local shopping areas, offices, educational institutions and parkland. The close proximity of the subject lands to the above-noted mix of land uses would help to reduce commuting requirements and thereby decrease transportation congestion.
2.1.1 Natural Features and areas shall be protected for the long term.	The subject lands do not contain any known natural areas.
2.4.1 Minerals and petroleum resources shall be protected for long-term use.	The subject lands do not contain any known mineral or petroleum resources.

PPS Policy	Response
2.5.1 Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.	The subject lands do not contain any known mineral aggregate resources.
2.6.1 Significant built heritage resources and significant cultural heritage landscapes shall be conserved.	The subject lands are vacant and do not contain any known built heritage resources or significant landscapes.
2.6.2 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.	No archaeological resources have been identified on the subject lands.
3.2.2 Sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects.	As discussed, a Phase II ESA report is being prepared by EXP. Any remedial measures that may be required will be identified in the Phase II ESA Report.

The 2020 Provincial Policy Statement seeks to achieve healthy, livable and safe communities by promoting efficient development and land use patterns. Given the foregoing assessment and provided any recommended site remediation measures are implemented, in our opinion the proposed Draft Plan is consistent with this broad vision. In this regard, the intended use of the Site:

- Represents an efficient development pattern for lands designated for residential and commercial purposes and situated at a prominent location along the Talbot Road corridor;
- Proposes a residential lot layout (Phase 1) that has regard for the established neighbourhood character, is compatible with the existing development context, encourages active transportation and is within close proximity of the City's arterial road network, transit system and cycling network;
- Establishes a development block intended for future commercial and multiple-unit housing forms that would collectively support the diversification, intensification and vitality of the local community. It is anticipated that the Phase 2 development would also help to promote neighbourhood stability by broadening housing choice available in this area (to better accommodate the changing needs of local residents over the long-term);

- Promotes a mix of uses that would help to (1) optimize municipal investments in servicing infrastructure and public transit, (2) support the long-term viability of commercial activities in proximity to the Site, and (3) generate substantial tax revenues to benefit the financial well-being of the Province and the City; and
- Would not involve development on lands having known significant environmental, cultural heritage, mineral aggregate or petroleum resources.

In light of these considerations and our broader evaluation of this proposal relative to the policies of the PPS, it is our opinion that this Draft Plan proposal is consistent with this policy document.

4.2 City of St. Thomas Official Plan

4.2.1 Overview

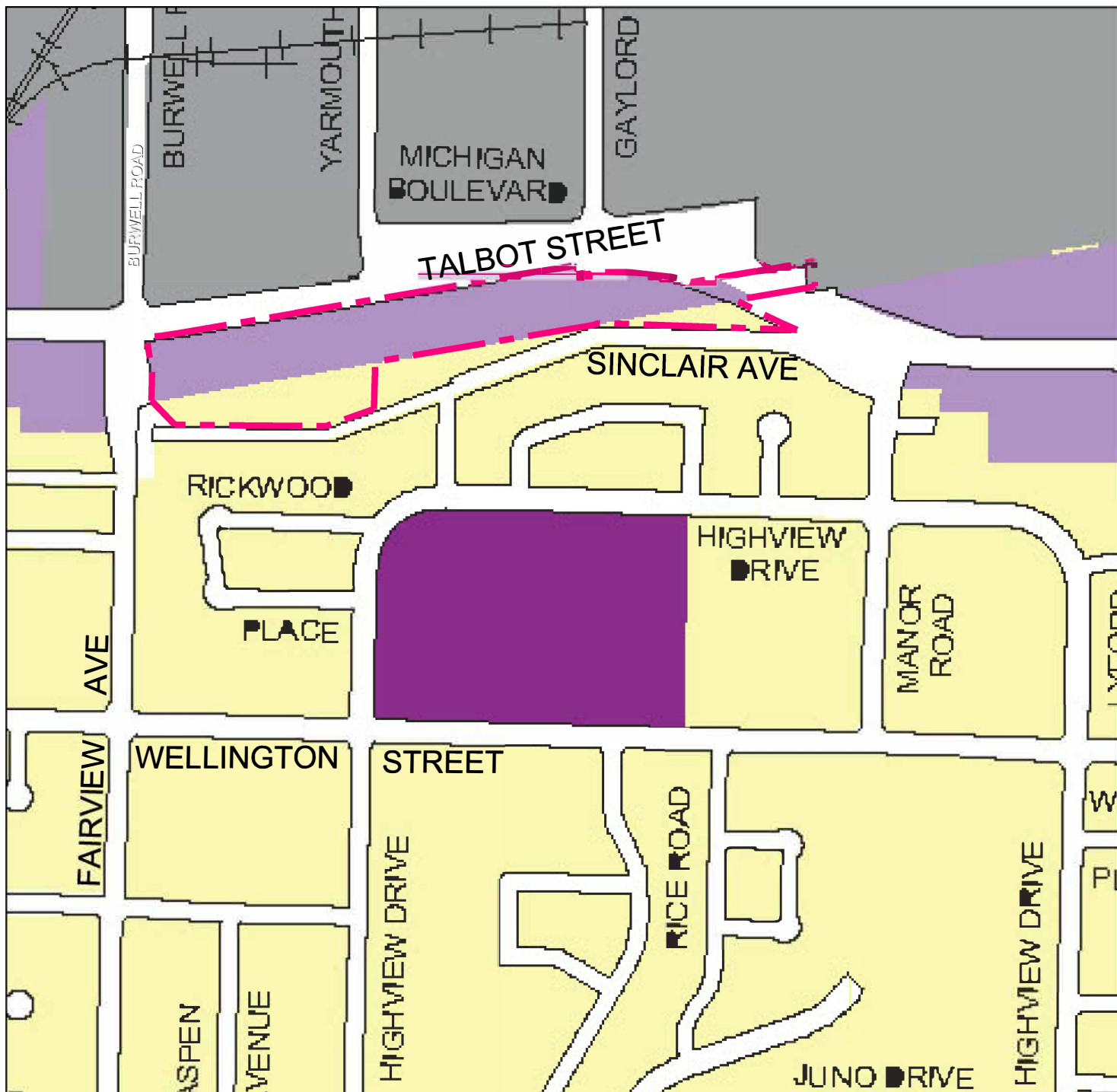
Policy 4.6 of the PPS states that Official Plans are the most important vehicle for implementation of the Provincial Policy Statement. It is further stated that Official Plans shall identify provincial interests and set out appropriate land use designations and policies. Accordingly, this proposal has been assessed relative to applicable policies of the City of St. Thomas Official Plan.

The existing Official Plan for the City of St. Thomas Planning Area was approved by the Minister of Municipal Affairs in 1963. As outlined in Section 1.1 of the Official Plan, the Plan has been updated in the intervening years to address matters such as downtown improvement, the structure of commercial facilities, and high density residential development.

4.2.2 Policy Direction and Land Use Designations

Section 1.1.4 of the Official Plan prescribes that, “The land use policies and designations are to guide development, redevelopment and/or infill/intensification in the City of St. Thomas for the period ending in 2026”. Further, as outlined in Section 2.1.1, the primary purpose of this Official Plan is to establish policies and programs for growth and development within the City.

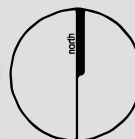
Figure 3 of this Report illustrates that the northern portion of the Site is designated Highway Commercial pursuant to Schedule ‘A’ of the Official Plan, with the southern portion of the property designated Residential.



- RESIDENTIAL
- MAJOR COMMERCIAL
- HIGHWAY COMMERCIAL
- EMPLOYMENT LANDS

Figure 3
Existing Official Plan
Schedule 'A'
Land Use Plan

SUBJECT LANDS



4.2.3 Planning Analysis: Applicable Policies

In light of the applicable land use designations and the scope of this Draft Plan proposal, in our opinion, a number of Official Plan policies respecting growth management, population projections, residential development and highway commercial uses are relevant to this proposal. The following discussion (1) summarizes, in our opinion, the core Official Plan policies relating to this proposal and (2) evaluates the merits of this project relative to this policy framework.

a) Growth Management

Section 2.1.2 of the Official Plan directs that as part of the process of managing land use change in St. Thomas, the Plan addresses a number of purposes including:

- "8. to inform both the private sector, and other governments of City policies for physical development in St. Thomas, to enable these groups to determine their future requirements and to allow them to be aware of municipal policies that will be used to evaluate their proposals.
9. to provide sufficient residential land and satisfy housing demands in terms of housing type, density and cost, taking into account household size and income of new households in accordance with the Provincial Policy Statements, as updated from time-to-time."

As discussed, the Site is designated Highway Commercial and Residential, and the Draft Plan has been designed to accommodate permitted uses in both designations. Development of the Draft Plan would also provide additional low density housing options in the community (Phase 1) and provide opportunities to accommodate multiple-unit housing types in conjunction with Phase 2 of site development.

b) Population and Growth Forecasts

Section 3.1 of the Official Plan sets out population and housing forecasts for the City, including the following projections with relevance to the proposed Draft Plan:

- A total population of 47,236 persons is projected by the year 2026 reflecting the anticipated growth patterns in the London Housing Market Area.
- The 2026 population capacity for the City of St. Thomas is projected to be:
 - 4,826 low density units;
 - 494 medium density units;
 - 633 high density residential units.

- Housing demand will be 63% owner-occupied and 37% rental accommodation over the 20-year planning period to 2026, taking into consideration population increases and demographic trends.

This proposal would support residential development of vacant, designated lands located within the City's Settlement Area. It is anticipated that the 19 residential lots proposed for Phase 1 of the Draft Plan would help the City accommodate its forecasted population growth and achieve its projected housing demands for low density, owner-occupied housing. Likewise, it is anticipated that residential component of Phase 2 of the site development plan would help the City achieve its housing demands for multiple-unit residential forms.

c) Community Improvement

Section 4.11.1 of the Official Plan identifies several initiatives to promote a community improvement goal to enhance the quality of life and wellbeing of residents and businesses within established neighbourhoods and older commercial areas of the City. Section 4.11.2 identifies several objectives to help promote local community improvement activities. In our opinion, the following objectives are particularly germane to this proposal:

- "i) to encourage the renovation, rehabilitation and, where appropriate, residential intensification of obsolete buildings and/or underutilized lands by the private sector;
- ix) to encourage the revitalization and version of older industrial areas, the redevelopment of obsolete "brownfield" industrial lands. ..."

As discussed, the proposed Draft Plan supports the rehabilitation of former railway lands and the development of adjacent vacant lands. The proposed residential and commercial uses are intended to be compatible with, and complementary to, the local development context. A Phase II ESA report is being prepared to confirm if any remedial measures may be required to advance development on the former railway corridor. This approach supports the above-referenced brownfield remediation policy and is in keeping with site remediation policies set out in Section 8.13 of the Official Plan.

d) Residential Policies

Section 5.1 of the Official Plan addresses policy direction for the Residential designation. These policies build from background considerations set out in Section 5.1.1. Most notably, in our opinion, the following guiding considerations pertain to this Draft Plan proposal:

- "ii) to provide sufficient residential land and satisfy housing demands in terms of housing type, tenure, density, lot size, unit size and cost, taking into account household size and income of households in accordance with the Population Projection and Housing Study as updated from time-to-time;

- v) to encourage residential intensification, infill and redevelopment activity in the City to provide appropriate housing for families, seniors and other special needs groups.”

In addition, Section 5.1.2 defines several goals respecting this designation. Referenced below are those policy goals that, in our opinion, are particularly relevant to this Draft Plan application:

- “i) to maintain and/or improve the present quality of the residential areas in the City;
- ii) to provide sufficient residential land and satisfy housing demands in terms of housing type, tenure, density, lot size, unit size and cost, taking into account household size and income of households in accordance with the Municipal Housing Statement and Land Use Review Study as updated from time-to-time;
- viii) to encourage residential intensification, infill and redevelopment activity in the City to provide appropriate housing for families, seniors and other special needs groups.”

The Phase 1 component of the proposed Draft Plan has been designed regard for the established neighbourhood character in the vicinity of the Sinclair Avenue corridor. In particular, the orientation and configuration of the proposed single detached residential lots are reflective of the low density residential character of the area and provide for separation from the proposed commercial block to the north (fronting Talbot Road). Development of Phase 1 would also provide additional low density housing options in the community through infilling (as discussed below). It is also anticipated that Phase 2 of the site development plan would provide opportunities for future multi-residential development to help promote additional housing choice in the local community.

Section 5.1.3.2 of the Official Plan provides that Low Density Residential uses are to include residential developments to a maximum of twenty-five (25) residential dwelling units/ha. This Section further prescribes that within a low density residential areas, the main permitted uses include single detached, semi- detached, duplex and triplex residential dwellings. It is further stated in this Section that infilling is encouraged where appropriate.

Phase 1 of the Draft Plan is intended to create 19 residential lots intended for single detached dwellings. The proposed lotting pattern yields a residential density of 18 units/ha. In our opinion, this lot layout is consistent with the permissions for low density residential areas. Further, pursuant to Section 5.1.3.6, in the context of the Official Plan, infilling is defined as new residential development within an established neighbourhood, on vacant or underutilized sites.

As stated in Section 5.1.3.6, redevelopment/infill may occur by consent or plan of subdivision and subject to specific criteria (e.g., regard for community character, provision adequate servicing, compatibility with local building design, and continuity with the residential streetscape).

Additionally, it is stated in this Section that infill projects requiring a ZBA will require the submission of a planning analysis to determine the appropriateness of the proposed development and potential measures to mitigate any potential adverse impacts on surrounding uses (in addition to any other required technical analyses). In our opinion, this Report addresses the applicable criteria for this planning analysis (e.g., compatibility of the use and housing forms, appropriateness of the site, potential impacts to identified natural features). It is also our opinion that the proposed Draft Plan satisfies the key locational and design criteria for infill development.

e) Highway Commercial Policies

Pursuant to Section 5.8.1 of the Official Plan, the Site is located within the Highway Commercial area defined along the Talbot Street frontage in the east end of the City. It is further stated in this Section that the City's Highway Commercial areas contain uses that rely on large traffic volumes to support specialized commercial uses. With respect to planned function, it is stated in this Section that:

"These areas are recognized for their existing commercial functions and are reserved primarily for the development of special commercial activities requiring, a substantial site area in order to provide off-street customer parking and outdoor display facilities and sites with visual prominence and/or good vehicular access."

Section 5.8.2 of the Official Plan sets out a number of goals for areas designated Highway Commercial, including ensuring new buildings in this designation have proper siting and adequate access. Further, Section 5.8.3.2 prescribes that permitted uses in the designation include hotels/motels, gas bars, convenience stores, restaurants, financial institutions and motor vehicle dealerships.

The proposed Draft Plan layout establishes a large commercial block at a prominent, highly accessible location along Talbot Street that can accommodate the types of uses permitted in this designation. In light of this, in our opinion, the proposed block layout would help to fulfill the planned function of this Highway Commercial area.

4.2.4 Conclusion

Given these considerations and our broader review of the Official Plan, provided any recommended site remediation measures are implemented, in our opinion the proposed Draft Plan conforms with the policy direction and permissions of this Plan. In particular, it is our opinion that the land use pattern associated with the proposed Draft Plan is compatible with the surrounding development context, supports housing choice and promotes appropriate infill development.

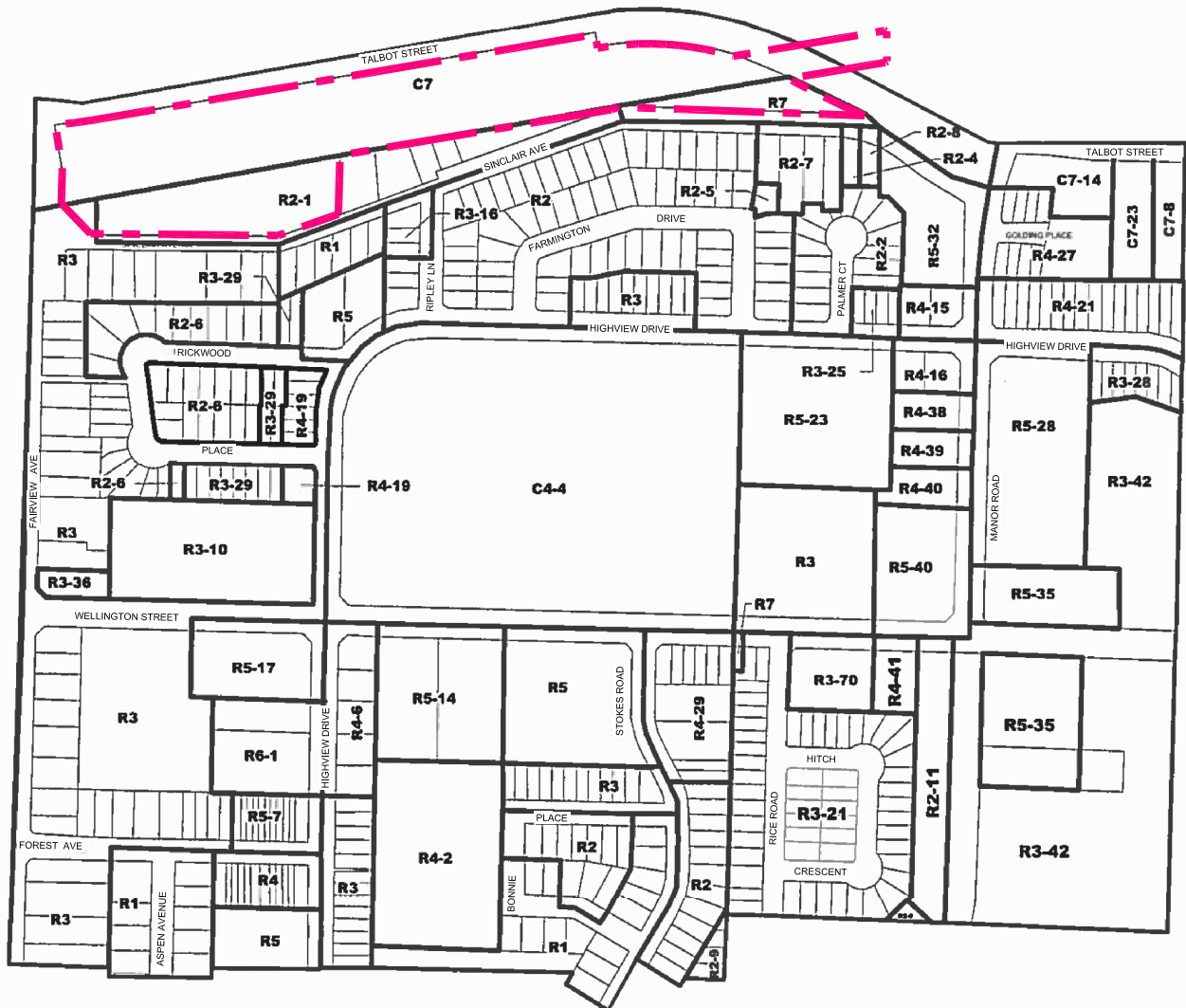
5.0

ZONING BY-LAW ANALYSIS

5.1 Existing Zoning

Figure 4 of this Report illustrates that multiple zones are applied to the Site pursuant to Zoning Map 18 of the City of St. Thomas Zoning By-law No. 74-2018 (Zoning By-law). The existing zoning structure is summarized below:

- **R2-1 Zone.** The Phase 1 lands intended for single detached residential development and an open space block are zoned Second Residential – Special Zone (R2-1). These lands measure approximately 1.04 ha in area and have approximately 220 m of street frontage along Sinclair Avenue. Section 6.1 of the Zoning By-law prescribes that a limited number of residential and institutional uses are permitted in the parent R2 Zone (e.g., single detached dwellings, provincial group homes, churches, nursing homes). Pursuant to Section 6.4 (Table 1) of the Zoning By-law, the parent R2 Zone requires a minimum lot area of 371.5 m², a minimum lot frontage of 12 m and a minimum rear yard depth of 9.0 m. Further, Section 6.5.1 defines that for the site-specific R2-1 Special Zone, the minimum rear yard depth is 27 m except for the easterly portion of the zone, where the minimum rear yard depth is 14 m;
- **C7 Zone.** The southern portion of the future development block fronting Talbot Street is zoned Highway Commercial (C7). These lands measure approximately 3.8 ha in area and have approximately 649 m of street frontage. Section 18.1 of the Zoning By-law defines a number of service/retail commercial uses permitted in this zone (e.g., retail food store, restaurant, car wash, convenience store). Additionally, Section 18.4.1 states that there is no minimum lot area or lot frontage regulation for the C7 Zone; and
- **R7 Zone.** The southern portion of the future development block fronting Sinclair Avenue is zoned Residential Development Zone (R7). These lands measure approximately 0.6 ha in area and have approximately 215 m of street frontage. Section 11.1 of the Zoning By-law prescribes that only existing uses and agriculture are permitted within the R7 Zone. The



Source: City of St Thomas Zoning Map 18

LEGEND

R1 FIRST RESIDENTIAL ZONE
 R2 SECOND RESIDENTIAL ZONE
 R3 THIRD RESIDENTIAL ZONE
 R4 FOURTH RESIDENTIAL ZONE
 R5 FIFTH RESIDENTIAL ZONE
 R6 SIXTH RESIDENTIAL ZONE
 R7 RESIDENTIAL DEVELOPMENT ZONE

C4 MAJOR COMMERCIAL ZONE
 C7 HIGHWAY COMMERCIAL ZONE

Figure 4 Existing Zoning

 SUBJECT LANDS

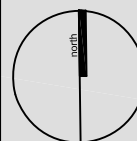


630 COLBORNE STREET,
 SUITE #202
 LONDON, ON, N6B 2V2
 P: 519 858 2797
 WWW.MHBCPLAN.COM

PLANNING
 URBAN DESIGN
 & LANDSCAPE
 ARCHITECTURE
 MHBC PLANNING

DATE: March 22, 2021

SCALE 1 : 2,500



P:\20211\A\Graphics\
 Figure 4 - Existing Zoning - March 22, 2021

Zoning By-law does not specify minimum lot area or lot frontage regulations for the R7 Zone.

A zoning analysis was conducted evaluating the proposed Draft Plan layout relative to the applicable R2-1, R7 and C7 development regulations. As an outcome of this review, it was determined that the lotting pattern for the 19 single detached lots would not comply with the special rear lot setback provision of the R2-1 Zone. According, a ZBA application is required to permit the proposed Draft Plan design.

5.2 Proposed Zoning

5.2.1 Considerations

Following an analysis of the Zoning By-law, it is our opinion that the lotting pattern proposed for the single detached lots can be generally accommodated by the existing R2-1 Zone structure. However, several of the residential lots within the Draft Plan are designed with frontages of less than 12.0, with a minimum lot width of 11.0 proposed. Further, Lots 1 and 2 have areas measuring less than the 371.5 m² requirement (332 m² and 370 m², respectively).

With respect to the proposed lot width of 11.0 m, a reduction in the standard 12.0 m wide frontage is considered in the City of St. Thomas' Alternative Development Standards for New Residential Lot Development (Executive Summary), dated March 17, 2003. Generally, Section 2 of this report identifies the basis for this assessment:

"As price and affordability are affected by both house size and lot size, there is merit in considering development on smaller lots. This can increase affordability because reduced costs associated with land area and servicing (roads, utilities) can be passed on to the consumer."

As an outcome of the assessment documented in this report, the City's Alternative Development Standards (ADS) Committee set out in following recommendation in Section 7.2:

"The Committee is recommending a new lot standard to meet current and projected market demands that are driven by affordability, demographics and lifestyle/consumer preferences. The new standard is based on a reduced lot frontage (11 metres) and other related standards and policies that will apply to development of new Plans of Subdivision incorporating the new standard. ..."

This report also sets out a number of additional recommendations relating to development under this recommended lot standard. These matters have been considered in the design of this Draft Plan; recognizing the existing development regulations of the parent R2 Zone. In

our opinion, the proposed lot configuration of the Draft Plan supports the affordability objective of the ADS Committee's lot frontage recommendation. It is also our opinion that the reduced lot frontages and lot areas associated with the Draft Plan layout (1) are adequate to accommodate the residential forms anticipated for these lands and (2) would support a compact land use pattern that is compatible with the local development context.

Additionally, it is our understanding that the minimum rear yard depth requirements set out in the R2-1 Zone were developed to provide adequate separation distance from the former railway corridor. As the rail corridor has been discontinued and the corridor is planned for redevelopment, in our opinion, the standard rear yard depth of the R2 Zone (9.0 m) is appropriate for the development of these lands.

5.2.2 Proposed Special Provision

To implement the proposed Draft Plan layout, it is proposed that Section 6.5.1 be replaced in its entirety with the following zone provision:

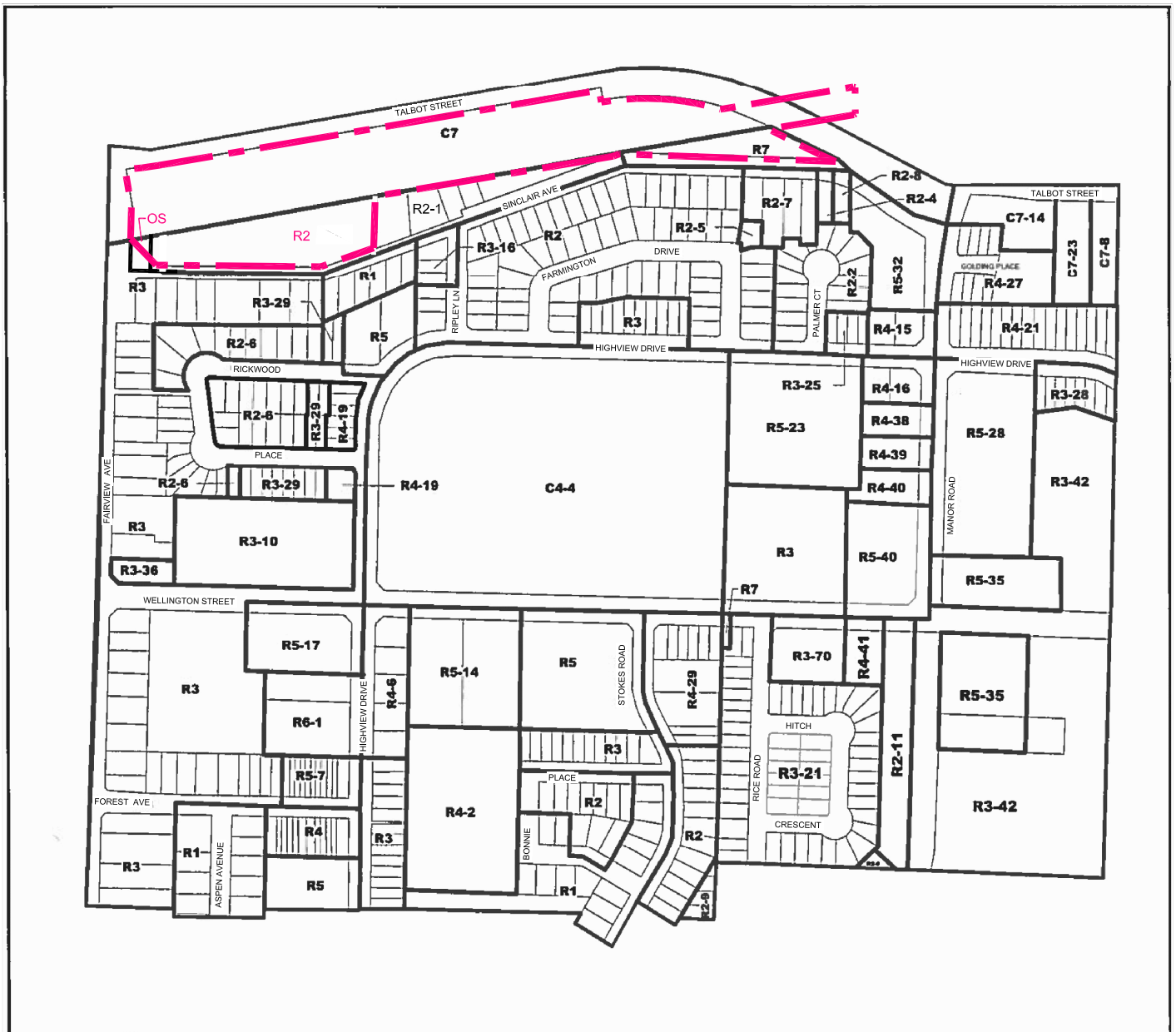
"6.5.1 Special Zone

- (a) Area Affected
R2-1 as shown on Special Zoning Map 18-1.
- (b) Minimum Lot Frontage: Single Detached Dwelling
11 metres.
- (c) Minimum Lot Area: Single Detached Dwelling
330 square metres."

Additionally:

- The proposed open space block is to be zoned 'Open Space and Park Zone (OS)', subject to further discussion with City staff; and
- The existing C7 and R7 Zones are to be retained for the future development block.

Figure 5 of this Report illustrates that proposed zoning.



Source: City of St Thomas Zoning Map 18

LEGEND

R1 FIRST RESIDENTIAL ZONE
 R2 SECOND RESIDENTIAL ZONE
 R3 THIRD RESIDENTIAL ZONE
 R4 FOURTH RESIDENTIAL ZONE
 R5 FIFTH RESIDENTIAL ZONE
 R6 SIXTH RESIDENTIAL ZONE
 R7 RESIDENTIAL DEVELOPMENT ZONE

C4 MAJOR COMMERCIAL ZONE
 C7 HIGHWAY COMMERCIAL ZONE
 OS OPEN SPACE ZONE

Figure 5 Proposed Zoning

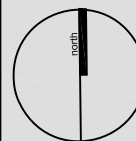
 SUBJECT LANDS


 630 COLBORNE STREET,
 SUITE #202
 LONDON, ON, N6B 2V2
 P: 519 858 2797
 WWW.MHBCPLAN.COM

PLANNING
 URBAN DESIGN
 & LANDSCAPE
 ARCHITECTURE
 MHBC PLANNING

DATE: March 22, 2021

SCALE 1 : 2,500



P:\20211\A\Graphics\
 Figure 5 - Proposed Zoning - March 22, 2021

6.0

CONCLUSIONS

In conclusion, provided any recommended site remediation measures are implemented, it is our opinion that the proposed Draft Plan of Subdivision and Zoning By-law Amendment applications are appropriate for the Site, compatible with the existing development context and in keeping with the framework of planning policy. This assessment is based, in part, on consideration of the following merits:

- The subject lands are located within the Settlement Area of the City of St Thomas and are designated for residential and commercial purposes pursuant to the City's Official Plan;
- The property is well suited for a mix of residential and commercial uses, given its physical characteristics, its location relative to the Talbot Street corridor, and its proximity to the arterial road network, public transit, active transportation routes, offices, schools, parks and residential neighbourhoods. Further, the mix of uses being considered for the Site would support the diversification, intensification and overall vitality of the local community;
- The orientation and configuration of the proposed single detached residential lots is intended: to be compatible with surrounding land uses; to complement the local development context; and to promote compact, efficient development;
- Preliminary assessments indicate that adequate road and servicing infrastructure is available to accommodate the proposed development;
- The Draft Plan proposal is consistent with the Provincial Policy Statement and conforms with the St. Thomas Official Plan;
- The proposed Zoning By-law Amendment would appropriately implement the intended site layout for the single detached residential lots; and
- The proposed development plan for the Sinclair Avenue Residential Subdivision represents good planning.

Given the noted considerations, it is recommended that the City of St. Thomas approve the Draft Plan of Subdivision and Zoning By-law Amendment applications as proposed.

Respectfully submitted,

MHBC

Planning, Urban Design & Landscape Architecture



Scott Allen, MA, RPP
Partner



Nicolette van Oyen, BES
Planner

