

MAY 2, 2025

PLANNING JUSTIFICATION BRIEF
131 EDGEWARE DRIVE ST THOMAS



SUPPORT A STANDARD PLAN OF CONDOMINIUM

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3. Executive Summary

The proposed ownership tenure of the commercial development at 131 South Edgware Road in the City of St. Thomas to individually owned commercial condominium units represents a thoughtful and policy-aligned response to the city's growing economic and service delivery needs. The development, consisting of a two-storey, 12-unit medical-commercial building, is fully approved and constructed, with no physical changes proposed as part of this application. The transition to condominium ownership offers long-term operational stability for medical professionals and small business owners by allowing them to build equity, reduce lease-related uncertainties, and make strategic investments in their premises. This change in tenure is particularly relevant in a context of regional economic expansion driven by developments such as the upcoming Volkswagen electric vehicle battery plant, which is projected to generate substantial job growth and increase demand for healthcare and personal services across the region.

The condominium proposal supports and is consistent with provincial, regional, and municipal policy frameworks. It promotes efficient land use by optimizing an already developed site within the urban boundary and aligns with broader goals of economic development, employment intensification, and the creation of complete communities. The subject site, located along a key arterial corridor and within a developing medical-service node, is well-positioned to meet growing healthcare needs in the community—especially given the well-documented shortage of primary care access in Elgin County. Moreover, by situating additional ownership-based professional services in a mixed-use area surrounded by residential, commercial, and institutional uses, the project supports a walkable and accessible urban environment.

The proposal also reflects emerging trends in Ontario's commercial real estate market, where small businesses increasingly seek ownership opportunities as a means of securing long-term stability and controlling operational costs. Medical clinics, in particular, benefit from consistent locations for building patient trust and maintaining clinical continuity. The proposal does not require any changes to the approved site plan, zoning permissions, or building design, and remains fully compliant with the City of St. Thomas's Zoning By-law and Official Plan designations for Business Employment Lands.

In summary, the proposal represents good planning, supports economic resilience and healthcare access, makes efficient use of existing infrastructure, and responds directly to the evolving needs of the City of St. Thomas. The application to create

condominiums as the property's tenure of choice, is both appropriate and in the public interest, and merits approval.

We are pleased to provide the necessary justification for the proposal.



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4. Introduction

Proposed Commercial Condominium

131 South Edgeware Road, City of St. Thomas, Ontario

Prepared by: G-Force Urban Planners & Consultants

On behalf of: Realdent Inc. / Dr. Amardeep Singh

G-Force Urban Planners & Consultants has been engaged by Realdent Inc., on behalf of Dr. Amardeep Singh, to prepare this Planning Justification Brief in support of converting the approved medical business centre to condominium ownership for a two-storey mixed-use commercial development located at 131 South Edgeware Road, within the City of St. Thomas, Ontario. The ownership structure will be registered through a Standard Plan of Condominium with owners enjoying exclusive use of some parking spaces.

A site plan agreement on file # 02-13-2023 has been approved and finalized. The by-law to authorize the Mayor and Clerk to execute and affix the Seal of the Corporation to a certain agreement between the Corporation of the City of St. Thomas and Realdent Inc. (File No.: SPC 01-22 - 131 South Edgeware Road - commercial plaza) (B/L 19-2023) (A/G 11-2023) was approved in the 10th Meeting of the 143rd Council in their meeting on February 13th, 2023.

The subject property consists of an existing approved commercial development designed to accommodate medical offices, clinics, and related service uses. The purpose of this report is to evaluate the planning merits of converting the development units to commercial condominium units. This type of tenure is to be formalized through a Draft Plan of Condominium application submitted to the City of St. Thomas.

This report provides a comprehensive assessment of the proposal's consistency and conformity with the relevant policy and regulatory documents, including:

- The Provincial Policy Statement (PPS, 2020);
- The County of Elgin and City of St. Thomas Official Plan;
- The City of St. Thomas Zoning By-law No. 74-2018.

In addition to addressing statutory conformity, the report highlights the broader economic and community benefits associated with this type of tenure. These include greater business stability, long-term investment incentives, and improved access to medical services for the local population.

The proposal reflects a positive form of land use evolution. It aligns with the City's strategic priorities for economic development, employment land intensification, and complete communities. The report demonstrates that the proposed ownership tenure constitutes sound planning, is in the public interest, and supports the long-term objectives of the City of St. Thomas.

5. Site Context and Description (Regional and Municipal Setting)

The subject site, municipally known as 131 South Edgeware Road (refer to figure 1- Aerial Photograph of subject site), is situated in the northeastern part of the City. The legal property description includes Part Lot 21, Registered Plan 287, Parts 14 & 15 on Plan 11R-8339, and Parts 2 & 6 on Plan 11R-9374. This location places the property within a growing commercial-residential corridor



Figure 1: Delineated Site

The City of St. Thomas is a growing urban center located in southwestern Ontario, strategically positioned within the County of Elgin and bordered by the Township of Southwold and the Municipality of Central Elgin. The city's location provides direct regional access to London and Highway 401, supporting both commuter connectivity and business logistics.

5.1. Physical Characteristics of the Site

The site has a total area of 0.46 hectares and features 28.18 metres of frontage along South Edgeware Road. The property is fully serviced with municipal infrastructure,

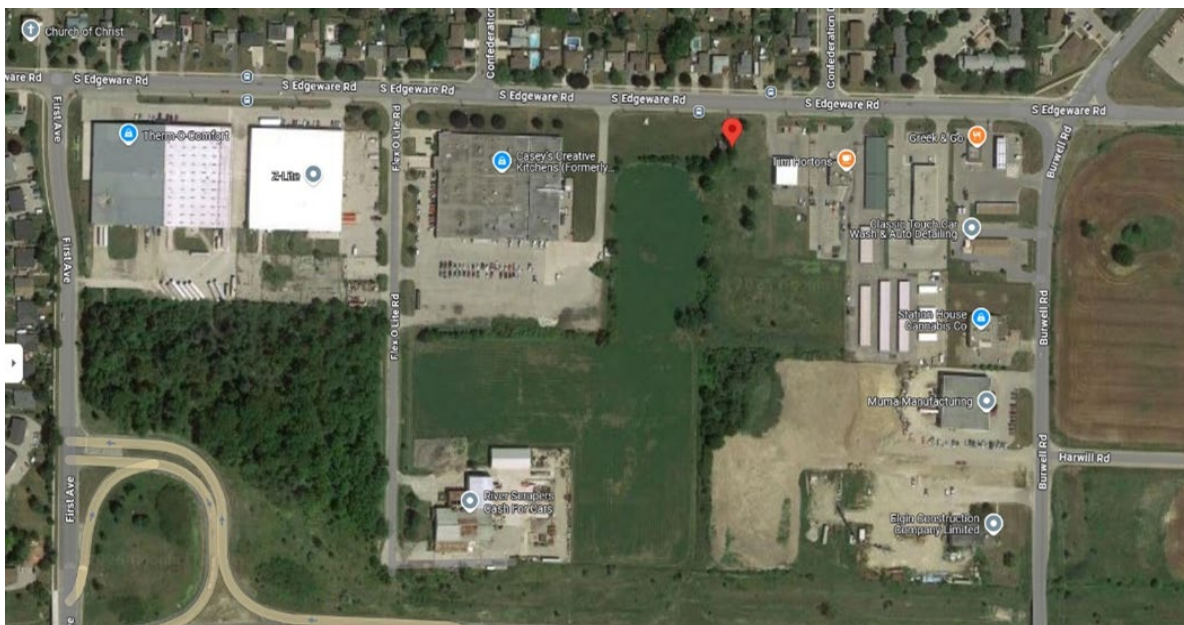


Figure 2: Aerial Photograph of subject lands

including; Municipal water supply, Sanitary sewer connection and Stormwater Management infrastructure.

The proposed development commercial building that has received previous site plan approval from the City of St. Thomas. The building has been constructed to accommodate medical offices and similar uses and is now proposed to transition from rental to ownership tenure through a commercial condominium structure.

1.1. Surrounding Land Uses

The subject site is in proximity to a combination of residential, commercial, and institutional land uses. Zoning designations in the area include BEL (Business Employment Land), and in proximity to Residential, and EL (Employment Lands). This mix of surrounding land uses reflects the area's function as a transition zone between established residential communities and employment areas. The site is well-positioned to serve both local and regional needs through small-scale, service-oriented commercial uses.

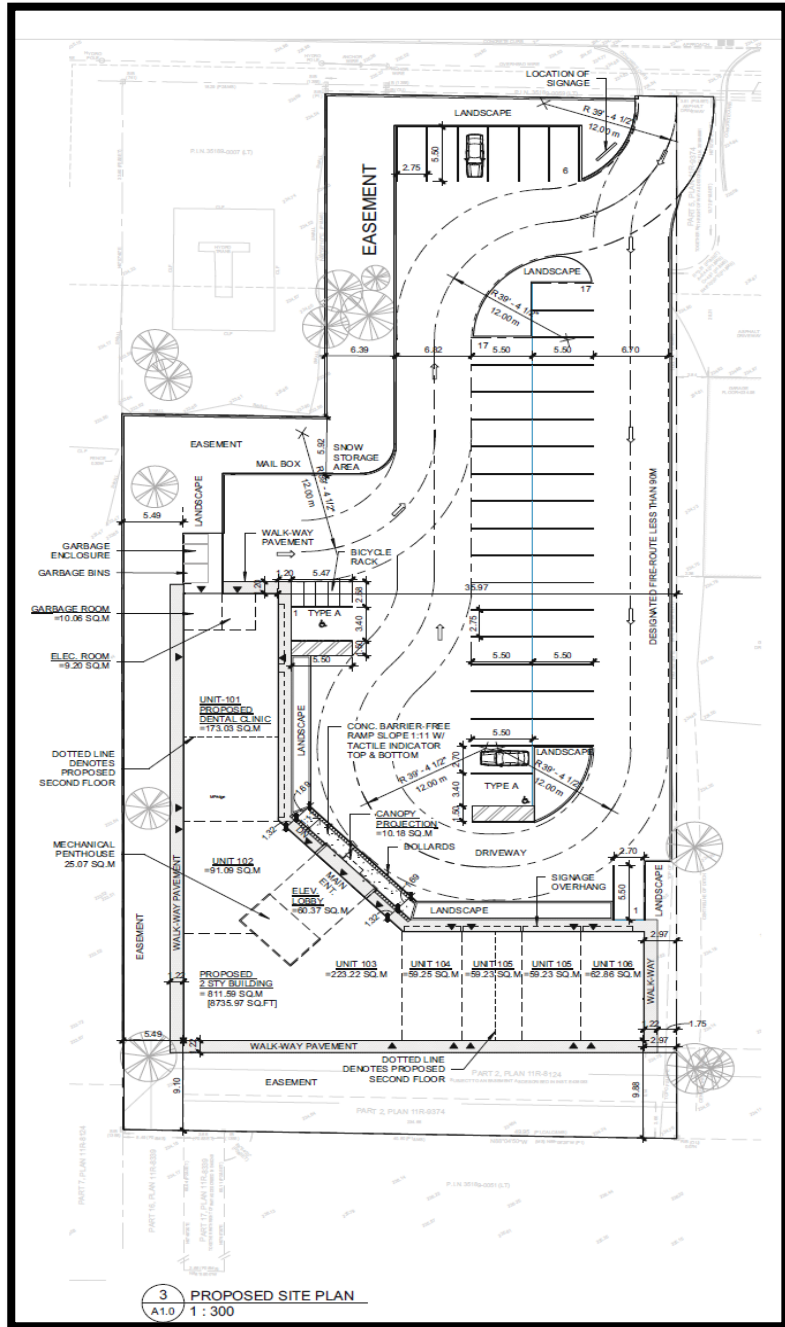


Figure 3: Site Layout

The area within a 3-kilometre radius of 131 South Edgeware Road in St. Thomas, Ontario, presents a diverse and evolving landscape that integrates residential



Figure 4: Uses in the near vicinity of the site

neighborhoods, industrial zones, educational institutions, recreational parks, and various amenities.

The vicinity encompasses a mix of established and emerging residential communities. To the west and northwest, neighborhoods such as Dalewood and Orchard Park feature a combination of single-family homes and multi-unit dwellings. These areas are characterized by tree-lined streets and proximity to schools and parks, fostering family-friendly environments. Recent housing developments have been observed along Edgeware Line and Highbury Avenue, indicating ongoing residential growth to accommodate the city's expanding population.

The northeastern segment of St. Thomas, particularly near Highbury Avenue and Edgeware Line, is designated for industrial and commercial activities.

This includes the development of a new Industrial Park aimed at supporting the forthcoming Volkswagen electric vehicle battery plant, a significant project anticipated to generate substantial employment opportunities and economic growth in the region. The presence of such industrial initiatives underscores the area's strategic importance for business and manufacturing operations



Figure 5 Surrounding Context

Within the 3-kilometre radius, several educational facilities serve the community. Parkside Collegiate Institute, located on Sunset Drive, is a prominent public secondary school offering diverse academic and extracurricular programs. Arthur Voaden Secondary School on Flora Street provides vocational and technical education, catering to students pursuing various career pathways. Additionally, elementary schools under the Thames Valley District School Board and the London District Catholic School Board are situated throughout the area, ensuring accessible education for younger students.

The region boasts several parks that offer recreational opportunities and green spaces for residents. Waterworks Park, situated directly south of the subject site, features a large playground, splash pad, and picturesque nature trails, making it a popular destination for families and outdoor enthusiasts. Pinafore Park, located to the southwest, provides additional amenities, including walking paths, gardens, and picnic areas, contributing to the community's quality of life.

The area is well-served by various amenities that cater to the daily needs of residents and businesses. Retail establishments, restaurants, and service providers are dispersed along major thoroughfares such as Highbury Avenue and Talbot Street. Healthcare facilities, including clinics and pharmacies, are accessible within the vicinity, supporting the community's well-being. The integration of these amenities within the residential and commercial fabric enhances the area's appeal as a convenient and livable environment.

The Site (131 South Edgeware Road) encompasses a dynamic blend of residential, industrial, educational, recreational, and commercial elements. This multifaceted landscape supports a balanced and sustainable community, aligning with the city's growth objectives and providing a conducive setting for the proposed development.

5.2. Regional Economic Influences

A major economic catalyst for the area is the Volkswagen electric vehicle battery plant, which is currently under development near Talbot Line and Yarmouth Centre Road, close to the St. Thomas Municipal Airport. Scheduled to commence operations by 2027, the facility is anticipated to create up to 3,000 direct jobs, along with thousands more indirect employment opportunities through the service and support sectors.

This significant regional investment will increase demand for a range of community services, including healthcare, professional offices, and personal services. The site at 131 South Edgeware Road, with its intended use as a medical-commercial building, is ideally situated to capitalize on this economic activity and provide essential services to a growing working population.

5.3. Access to Community Services and Healthcare Infrastructure

The site is embedded within a healthcare service corridor, with access to several medical and community support services, including:

- VON Community Support Services
- Windemere Family Medical Centre
- St. Thomas Walk-In Medical Clinic
- Elgin Community Health Hub
- St. Thomas Elgin General Hospital (approximately 9-minute drive)

The concentration of health services in proximity to the site further justifies its intended use and highlights the role this property will play in supporting local and regional healthcare needs.

5.4. Transportation and Mobility Network

South Edgeware Road is a major arterial corridor featuring active transportation infrastructure such as bike lanes (refer to Schedule B Road Plan-Figure 5), along with existing public transit service. The site enjoys excellent vehicular connectivity via:

- Highbury Avenue (north-south link to Highway 401)
- Highway 3 (east-west connection through the city and region)

Transit accessibility is enhanced by two nearby bus stops serving eastbound and westbound routes, supporting employees and patients traveling to the site without a

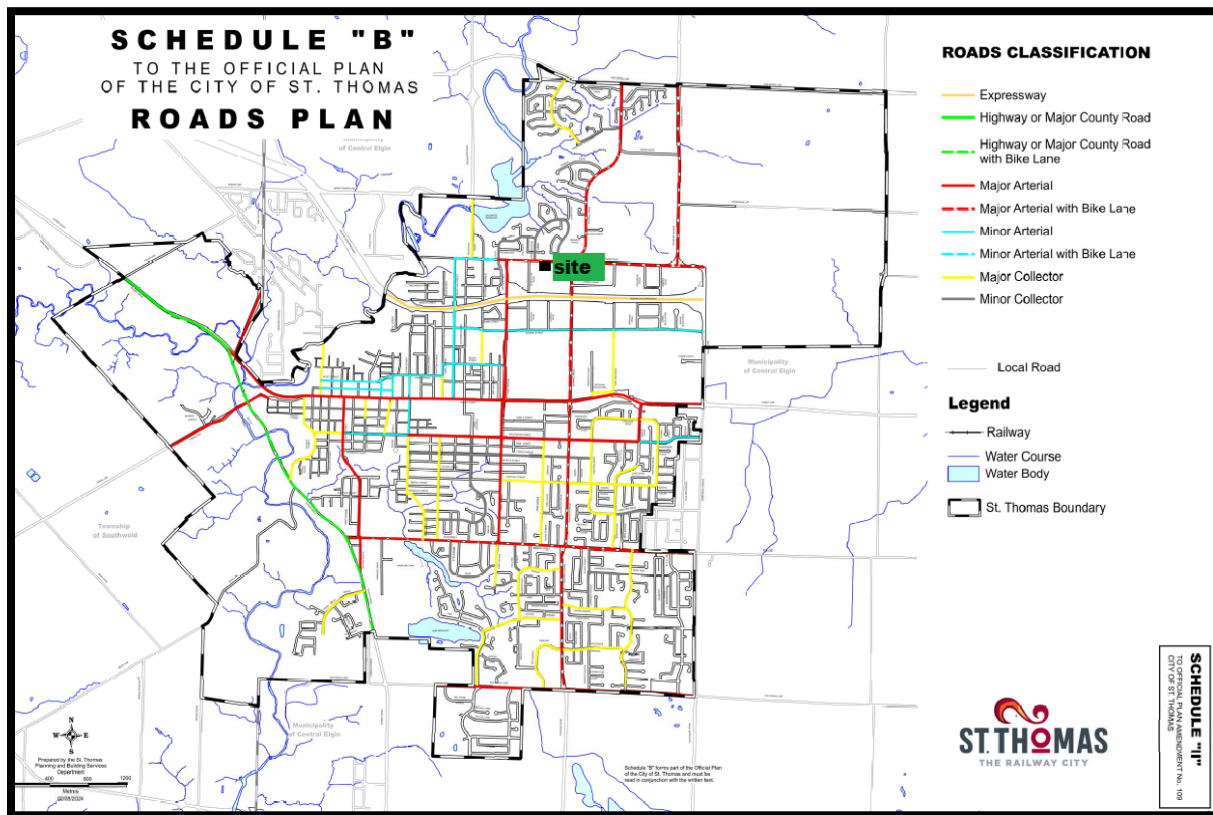


Figure 6: Schedule B-Road Plan

private vehicle. Additionally, an EV charging station adjacent to the subject property reflects broader trends toward sustainability and transportation diversification. The City's ongoing transportation improvements, including the 29-metre right-of-way allowance (Refer to Schedule C Road Widening Plan-Figure 6) on South Edgeware Road, are

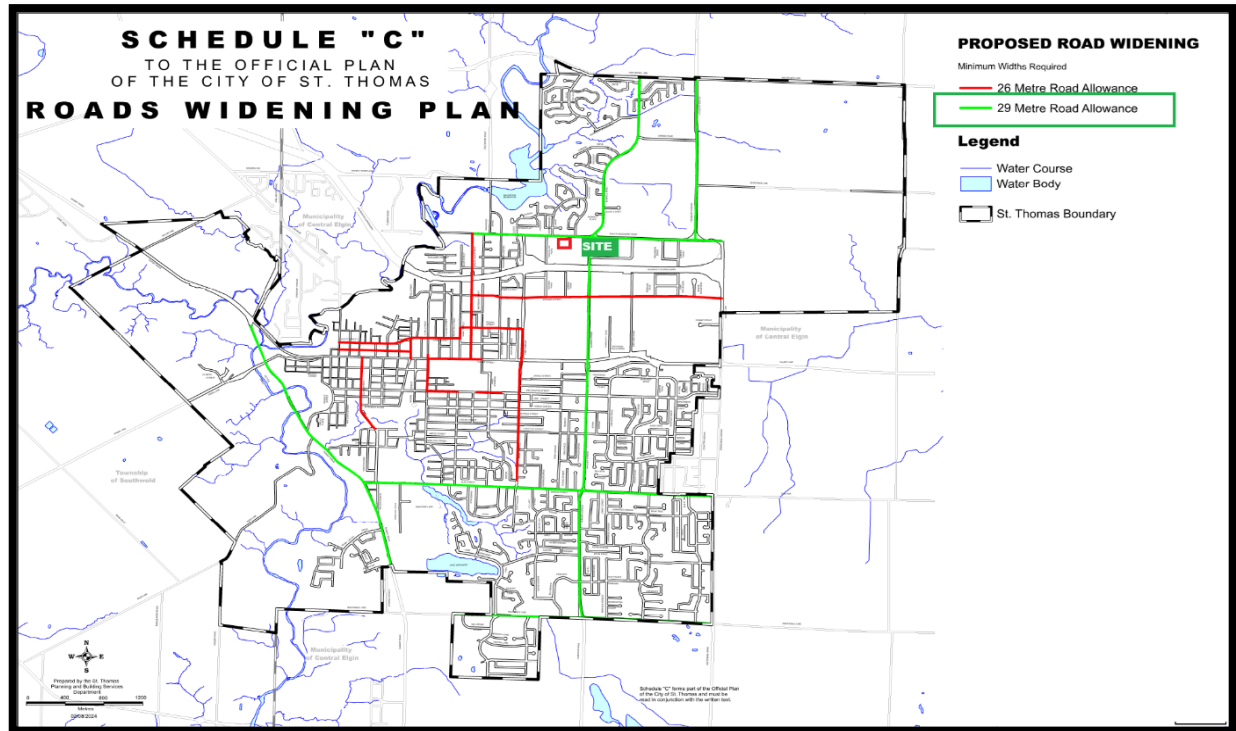


Figure 7 : Road Expansion

intended to support increased traffic volumes associated with area growth and regional employment expansion.

6. Site Development

The proposed development at 131 South Edgeware Road involves the formal registration of a two-storey commercial building as a standard condominium that provides individual ownership of the Units within the building, with the owners also maintaining exclusive use of some of the parking spaces. This proposal does not involve any physical changes to the built form, site layout, or permitted uses; instead, it formalizes ownership to allow for the individual sale of commercial units, primarily targeting healthcare professionals and small business operators.

This ownership tenure is part of a broader strategy to promote long-term investment in the local business community, provide greater operational stability for tenants, and support the evolving healthcare and service needs of the growing St. Thomas population.

6.1. Site Plan and Building Description

A site plan application was submitted in 2022 and has been approved by the City of St. Thomas. The proposed development comprises:



Figure 8: Elevation of proposed medical building

- a) A two-storey commercial building; (refer to figure 2: conceptual rendering)
- b) 12 commercial units, designed to accommodate professional offices and medical clinics
- c) A total gross floor area of 1,334.59 square metres, divided as follows:
 - I. First Floor: 811.90 square metres
 - II. Second Floor: 500.52 square metres

The building is organized to ensure flexible unit sizes and shared common elements. Common areas include:

- a) Central staircase and corridors
- b) Shared washrooms

c) Visitor parking

The development's layout allows for a wide range of business types, while its design caters specifically to healthcare professionals by ensuring accessibility, patient-friendly circulation.

6.2. Parking and Access

The site provides 44 total parking spaces. This includes:

- 42 standard parking spaces
- 2 accessible parking spaces

The design ensures that on-site parking supports both the operational needs of tenants and the convenience of patients or clients, especially those with mobility challenges. Access is directly from South Edgeware Road, a designated arterial road that facilitates seamless integration into the broader transportation network.

PROJECT STATISTICS				
ADDRESS:		131 SOUTH ADGEWARE RD ST THOMAS ON N5P 2G9		
ZONING:		BUSINESS EMPLOYMENT LAND ZONE (BEL)		
LOT AREA:		4652.58 m ²		
LOT FRONTAGE:		28.18m		
		EXISTING	PROPOSED	TOTAL
BUILDING AREA (MAX. PERMISSIBLE = 50%)			811.09 m ²	811.09 m ²
GROSS FLOOR AREA (EXCL. DOUBLE HT.)			1334.50 m ²	1334.50 m ²
FIRST FLOOR AREA = 811.90 SQ.M.		3		
SECOND FLOOR AREA = 500.52 SQ.M.				
MECH. PH. FLOOR AREA = 22.08 SQ.M.				
TOTAL GFA. = 1334.50 SQ.M				
<u>PARKING:</u>				
PARKING RATE (39.3A)		3/100m ²		
TOTAL PARKING SPACES REQUIRED		41 spaces		
TOTAL PARKING SPACES PROVIDED		42 spaces		
TOTAL ACCESSIBLE PARKING SPACES REQUIRED				
TYPE A		2 space		
TOTAL ACCESSIBLE PARKING SPACES PROVIDED				
TYPE A		2 space		

Figure 9: Site Statistics

6.3. Condominium Ownership Structure.

The proposed development at 131 South Edgeware Road will proceed under a Standard Condominium registration pursuant to the Condominium Act, 1998, S.O. 1998,

c. 19. This model is best suited to a new, purpose-built, multi-unit medical-commercial building where internal office spaces are to be sold as individually titled condominium units, while shared facilities such as corridors, washrooms, stairwells, and visitor parking are maintained as common elements.

A Standard Condominium permits the developer to register individual commercial office or clinic units as discrete legal parcels, each with its own Property Identification Number (PIN). These units will form the basis of the sales and ownership structure, allowing healthcare professionals and small businesses to purchase and hold full title to their respective premises.

All shared spaces—including lobbies, common washrooms, mechanical rooms, staircases, elevators (if applicable), and structural elements—will be designated as common elements and managed by the condominium corporation.

The condominium plan will be supported by a Declaration and Description that clearly defines:

- Unit boundaries (vertical and horizontal)
- Permitted uses (e.g., professional office, medical clinic)
- Common element responsibilities and cost-sharing

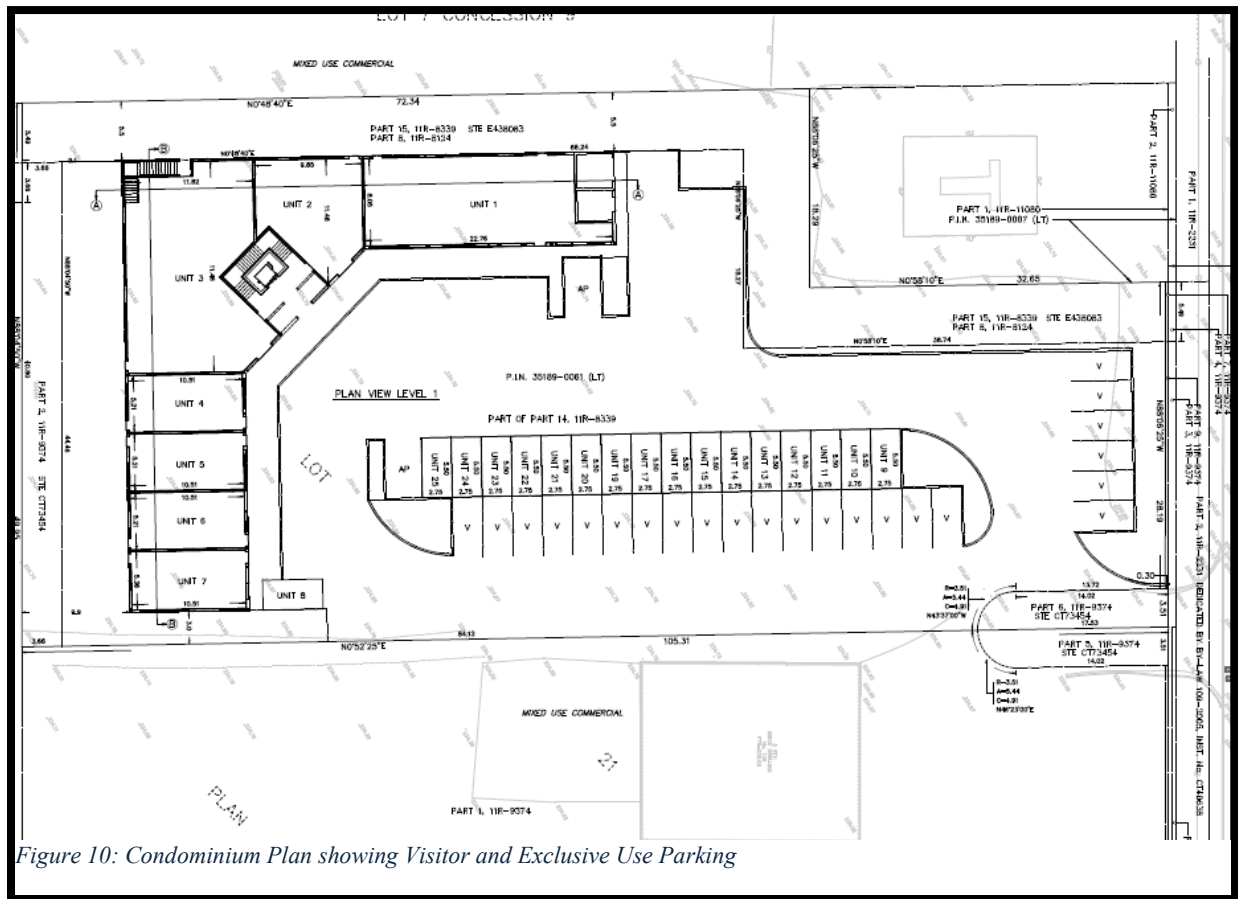


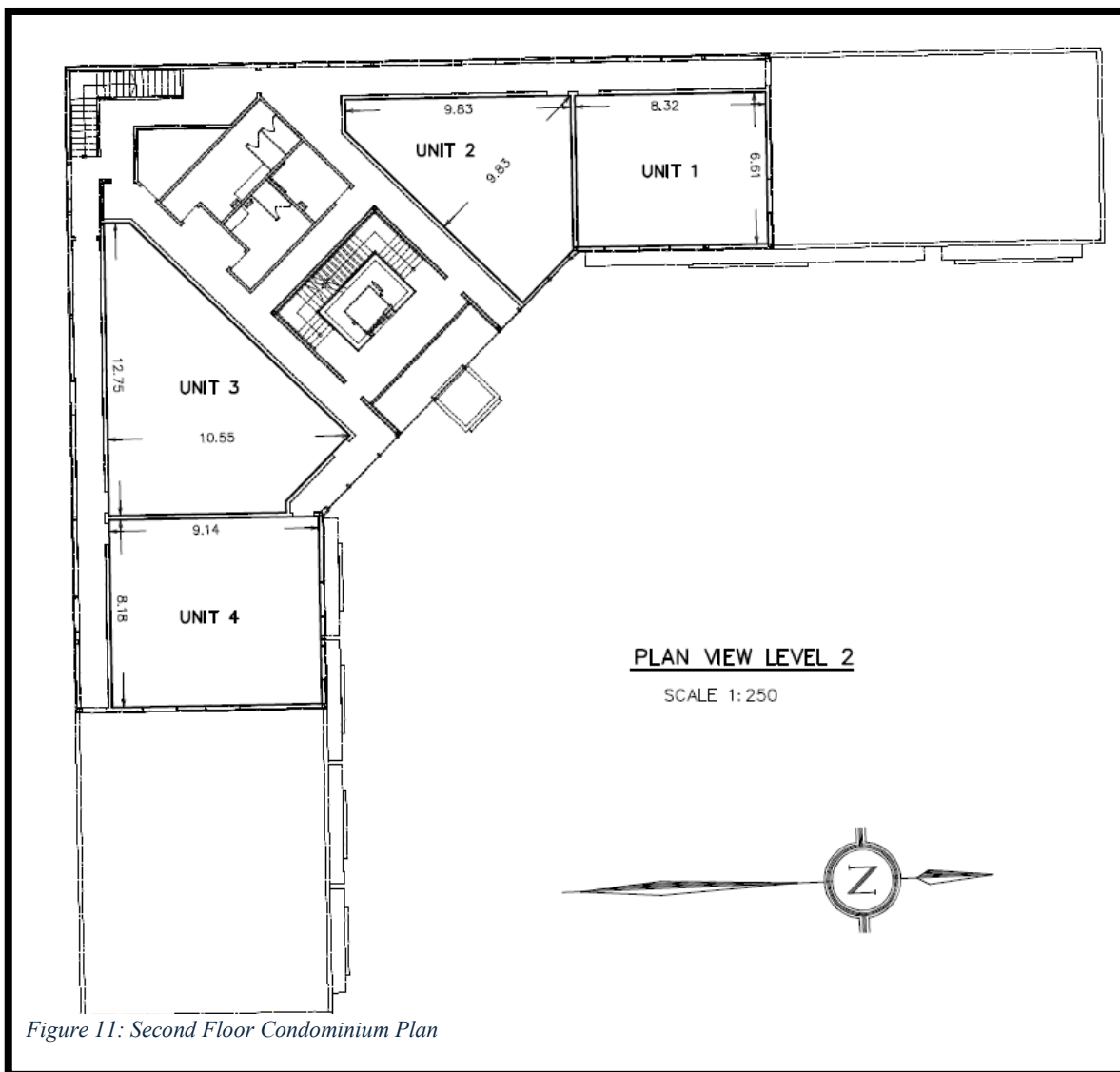
Figure 10: Condominium Plan showing Visitor and Exclusive Use Parking

- Exclusive use rights tied to parking and signage

Parking Allocation – Exclusive Use Common Elements

A total of 42 parking spaces have been provided on-site, of which 2 spaces are barrier-free accessible parking in compliance with accessibility standards. The allocation of these spaces will be organized as follows:

- Exclusive Use Parking Spaces: On the Condominium Plan, parking spaces intended for Unit owners 101-107 (Ground Floor) and Unit owners 201 to 204 (Second Floor) identified as Units 8-25 will be designated as exclusive-use parking tied to specific commercial units. This allocation will be outlined in Schedule 'C' of the Declaration and on the Condominium Plan. Each unit will have an assigned parking space (or more, based on size or agreement), which



remains part of the common elements but is reserved exclusively for that unit's use.

- **Visitor Parking:** Remaining unallocated parking spaces will be retained as shared common elements accessible to all unit owners and their clients. These visitor spaces will be managed and maintained by the condominium corporation.
- **Accessible Parking:** The 2 barrier-free parking spaces will be maintained as fully common elements, ensuring compliance with AODA regulations and available for any visitors or clients requiring accessibility support.

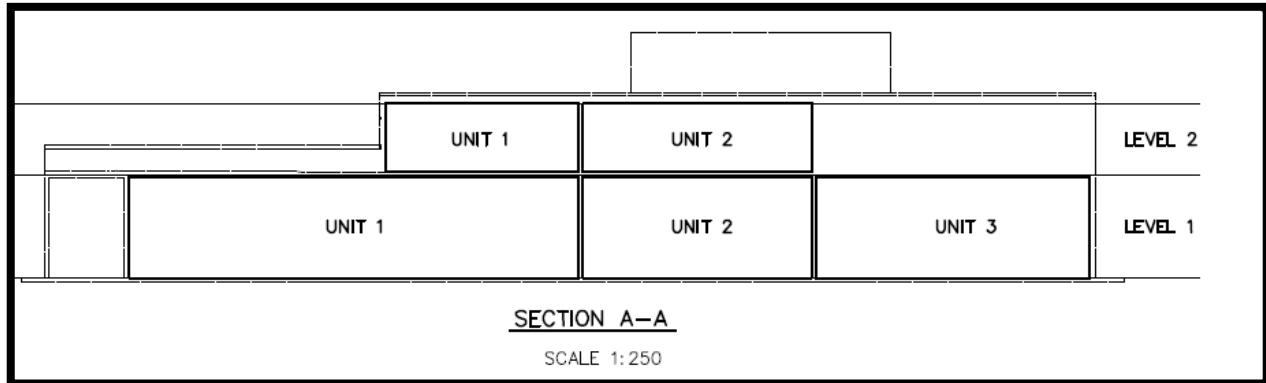


Figure 12: Section A-A of the Condominium Plan

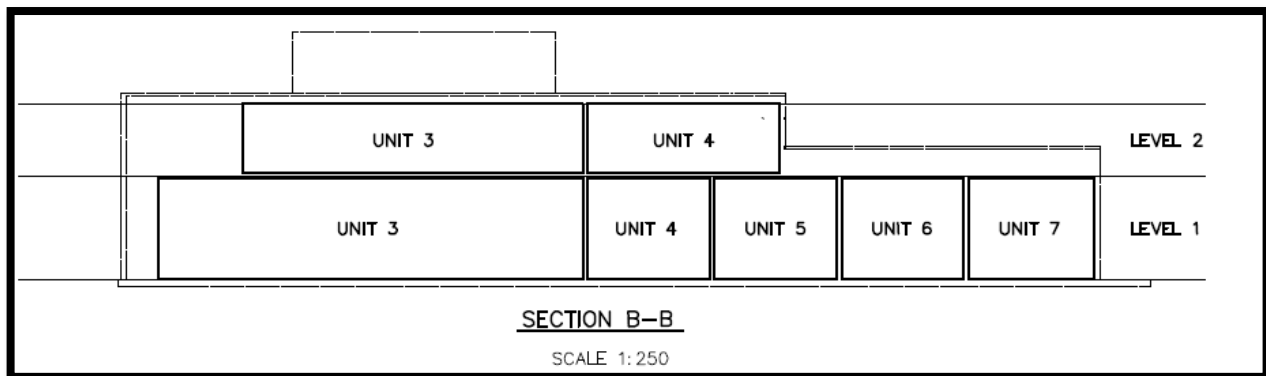


Figure 13: Section B-B of the Condominium Plan

This model provides a balance between individual control and centralized governance. Unit owners will have predictable access to their dedicated parking space(s), while also contributing to the shared management of visitor and accessible parking areas.

The use of a Standard Condominium with exclusive use parking rights offers several advantages:

- **Ease of Unit Ownership and Financing:** Buyers can obtain mortgages and resell units easily, as each suite is a titled legal property.

- Clear Parking Entitlements Without Title Complexity: Exclusive use designations offer predictability without requiring the creation of parking as separate legal units.
- Simplified Governance: The condominium corporation can focus on maintaining common areas and enforcing consistent operational standards, while individual owners control their own space.
- Compliance with Planning and Legal Standards: The structure aligns with the Condominium Act, 1998, the City of St. Thomas Zoning By-law No. 74-2018, and the parking rate requirements outlined under Section 39.3A (3 spaces per 100m² GFA).

Condominium Declaration and Plan Requirements; The registration process will include:

- A Registered Plan of Survey showing all condominium units and common elements
- A Condominium Declaration, which will:
 - Tie exclusive use parking spaces to specified commercial units
 - Define maintenance obligations for common elements
 - Establish voting rights, cost apportionment, and rules of operation
- A Description outlining physical boundaries and common areas

These documents will be reviewed by the City of St. Thomas, and upon registration, the condominium corporation will be created to assume ownership and management responsibilities of the shared elements.

This structure enables the project to meet contemporary expectations of commercial condominium ownership while delivering a medically focused, professionally operated, and policy-compliant development that enhances community service access and investment stability.

The intended use of the units is primarily for medical clinic and offices, and will comprise of service-based businesses, all of which are permitted under the Business Employment Land (BEL) Zone in Zoning By-law No. 74-2018.

Alignment with Market Trends

The proposed ownership model responds directly to ongoing shifts in commercial real estate and small business operation, including:

- An increase in demand for professional and health-related services closer to residential areas
- A preference among small business owners to own rather than lease, especially as interest in long-term operational control and financial predictability grows

- The trend toward mixed-use and service nodes that cater to walkable, transit-connected communities

As the City of St. Thomas continues to grow—spurred in part by major investments like the Volkswagen EV plant—flexible, ownership-based commercial spaces will become increasingly essential to sustaining local employment, supporting entrepreneurs, and enhancing service availability across the community.

7. Policy Analysis and Compliance

The proposed development at 131 South Edgeware Road, which involves the proposal to provide units for medical offices and professional services on an ownership basis, aligns with several key planning policies at the provincial, regional, and local levels. This section analyzes the compatibility of the proposal with relevant policies, including the Provincial Policy Statement (PPS), the City of St. Thomas Official Plan, and the applicable Zoning By-law.

7.1. Ontario's Economic Growth Plan & Small Business Strategy

Ontario's *Economic Growth Plan* and *Small Business Success Strategy* outline coordinated provincial policy directions aimed at strengthening local economies by supporting entrepreneurship, encouraging business investment, and reducing structural barriers for small and medium-sized enterprises. These strategies place strong emphasis on the development of job-creating spaces, especially in transitioning urban areas like the City of St. Thomas, where economic activity is being reshaped by large-scale investments such as the Volkswagen electric vehicle battery plant.

The Growth Plan supports the modernization of local economies by promoting innovation, improving land readiness, and fostering place-based investment to generate long-term employment. In parallel, the Small Business Strategy specifically targets the need to create stable and accessible commercial space for independent professionals, service providers, and healthcare operators, many of whom cite leasing volatility and high entry costs as major constraints to long-term success.

The proposed development at 131 South Edgeware Road into a standard condominium directly supports these objectives by creating titled, ownership-based commercial units that provide healthcare professionals and service-based entrepreneurs with greater financial security and operational control. This structure enables small businesses to avoid lease instability and invest in their premises over the long term, contributing to economic resilience and continuity of services within the local community. In addition, the project helps fill a gap identified in the province's strategies—namely, the shortage of flexible, professional-grade commercial space in mid-sized urban centres. By offering appropriately scaled medical-commercial units within a managed, well-located development, the project improves access to healthcare and professional services, both of which are foundational to broader community and workforce well-being.

Furthermore, the development advances the provincial goal of improving local business competitiveness by directing investment to a designated employment area, thus supporting the economic intensification of serviced land in an area already seeing significant growth. The project reflects a proactive alignment with Ontario's stated priorities by enabling business ownership, supporting healthcare service delivery, and reinforcing the economic transformation of St. Thomas into a regional employment hub.

By facilitating entrepreneurship, reducing barriers to commercial stability, and enhancing the supply of business-ready space, the proposed condominium contributes meaningfully to the province's broader goals for inclusive, innovation-driven growth.

7.2. Provincial Policy Statement (PPS) 2024

The Provincial Policy Statement (PPS) 2020 provided policy direction on land use planning and development in Ontario along with the Growth Plan for the Greater Golden Horseshoe.

In 2024, Ontario has consolidated its land use planning framework into a single document known as the Provincial Planning Statement, 2024. This new policy came into effect on October 20, 2024, replacing both the Provincial Policy Statement, 2020 and the Growth Plan for the Greater Golden Horseshoe. This unified PPS aims to streamline planning processes, facilitate housing and employment growth, and provide municipalities with greater flexibility to address local needs.

The PPS 2024 serves as the province-wide land use planning policy framework, streamlining and integrating policies to support Ontario's goals, including the development of 1.5 million new homes by 2031.

Under the Planning Act, all land use planning decisions in Ontario made on or after October 20, 2024, must be consistent with the PPS 2024. This unified policy aims to provide municipalities with greater flexibility and tools to facilitate growth, housing development, and infrastructure planning.

The proposed development at 131 South Edgeware Road, St. Thomas aligns with several key policies of the PPS 2024. Below is an analysis of relevant policies and the proposal's conformity:

Section 2.1- Planning For People and Homes requires planning authorities to base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance. Municipalities are to ensure sufficient land is available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years. The proposed development contributes to the efficient use of land within a designated settlement area, supporting the accommodation of projected employment growth in St. Thomas over the long term.

Under Section 2.1.6 the PPS states that *"Planning authorities should support the achievement of complete communities by: a) accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and*

cemeteries), recreation, parks and open space, and other uses to meet long-term needs.

The proposed standard commercial condominium development at 131 South Edgeware Road conforms strongly to Section 2.1.6 of the Provincial Planning Statement, 2024, which directs planning authorities to support the achievement of complete communities. Specifically, Section 2.1.6 (a) emphasizes the importance of accommodating a diverse and integrated range of land uses, housing options, transportation modes, employment opportunities, and essential public services.

This proposal contributes meaningfully to the creation of a competitive and complete community by introducing permanently owned, service-based commercial units, with a focus on accommodating healthcare and professional service providers within a walkable, mixed-use corridor of the City of St. Thomas. The site's design encourages accessibility for a variety of users, including patients, staff, and service providers, and supports long-term economic and social stability by enabling ownership rather than leasing of workspaces.

Located within the Business Employment Land (BEL) zone, the development complements surrounding residential neighbourhoods and institutional uses by increasing access to medical services, such as family physicians, dental clinics, physiotherapy, and other allied health practices. These uses reduce the need for residents to travel long distances for basic services, particularly important in light of existing primary care shortages in Elgin County.

The site also benefits from strong transportation connections, including arterial road access (South Edgeware Road), nearby public transit service, and dedicated bicycle infrastructure. These features align with the PPS's call for multimodal access and inclusive mobility options. Furthermore, the inclusion of visitor parking, accessible parking spaces, and proximity to parks such as Waterworks Park ensures compatibility with recreation and open space planning goals in the surrounding area.

By integrating small-scale employment uses into a medically oriented development node, the project responds directly to community needs while reinforcing the functional diversity and social sustainability envisioned by Section 2. It enhances access to local services, supports regional employment growth, and contributes to the evolving character of St. Thomas as a connected, inclusive, and service-oriented urban environment. In this way, the proposal satisfies both the letter and spirit of the policy, by accommodating a mix of land uses and essential services to meet long-term needs in a compact and well-integrated form.

Under section 2.3- Settlement Areas and Settlement Area Boundary Expansions the sections relevant to our proposal include 2.3.1 – *Planning authorities shall identify settlement areas and encourage their vitality and regeneration*, Section 2.3.2 – *Land use patterns within settlement areas shall be based on a range and mix of land uses*

and densities that efficiently use land and infrastructure, support transit and active transportation, and avoid the need for unjustified expansion., Section 2.3.4 – Growth should be directed to settlement areas where full municipal services are available or planned and Section 2.3.6 – Settlement area boundary expansions may be permitted outside of a municipal comprehensive review if the proposed expansion meets criteria such as supporting housing and employment objectives, optimizing existing infrastructure, and being adjacent to the existing settlement boundary.

The proposed development at 131 South Edgeware Road conforms fully to the policy intent and criteria set out in Section 2.3 of the PPS. The site is located within an existing designated settlement area of the City of St. Thomas and therefore does not trigger or require a settlement area boundary expansion under Policy 2.3.6. This satisfies the policy requirement to direct growth to existing settlement areas as the primary focus for development. Furthermore, the development is being proposed on a fully serviced parcel—municipal water, sanitary sewer, and stormwater infrastructure are already in place, meeting the directive under Section 2.3.4.

The proposal also supports the vitality and regeneration of the urban fabric by transitioning a newly constructed commercial building from rental tenure to permanent ownership. This move enhances long-term business investment, stability, and integration with the surrounding community, consistent with the goals of Section 2.3.1. In addition, the land use pattern being proposed represents a compact, mixed-use form that efficiently utilizes the land base and supports active transportation and transit. The subject property fronts South Edgeware Road, a major arterial corridor equipped with bike lanes, sidewalks, and public transit access. These attributes align with Section 2.3.2, which encourages development that supports sustainable transportation and reduces land consumption.

Overall, this commercial development optimizes existing infrastructure, supports a range of small-scale employment uses, and integrates harmoniously with the broader residential and institutional context of the area. It is therefore fully compliant with the intent and specific provisions of Section 2.3 of the PPS, 2024.

The proposed commercial condominium development demonstrates clear and comprehensive alignment with the policy directives under Section 2.8.1 of the Provincial Planning Statement (PPS), 2024, which focuses on Supporting a Modern Economy. Section 2.8.1.1 (a) *directs planning authorities to provide for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs.* The proposed development fulfills this directive by offering a purpose-built, multi-unit commercial building that accommodates a range of medical, professional, and wellness-based services. These uses contribute to the community's long-term employment and institutional service needs by enhancing access to primary care, allied health professionals, and related professional services. As the units will be owned rather than leased, the model also encourages deeper local economic ties and greater investment security for independent operators.

Section 2.8.1.1 (b) requires municipalities to *‘provide opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses’*. The subject property does exactly this by expanding the inventory of market-ready employment space within a serviced, zoned, and strategically positioned site. The development provides smaller-format commercial suites designed to accommodate owner-occupiers—an increasingly important model in suburban employment areas where conventional large-scale office parks are no longer the sole norm. The building’s flexible layout and medical-commercial orientation make it suitable for a range of professional services, which broadens the city’s economic base and provides options for both established and emerging businesses.

Section 2.8.1.1 (c) *emphasizes the identification of strategic sites for investment and the need to monitor and ensure the availability of employment lands*. The subject site clearly qualifies as a strategic employment investment site, given its proximity to key infrastructure, including South Edgeware Road (an arterial road), nearby transit stops, and major employment generators such as the Volkswagen EV battery plant. The project enhances the utility of this strategic location by ensuring long-term employment-generating uses are secured through ownership, and by eliminating tenancy volatility which can lead to underutilization.

Section 2.8.1.1 (d) *encourages intensification and compact, mixed-use employment development to support the achievement of complete communities*. The proposed development represents an intensified form of employment land use by consolidating twelve units within a two-storey footprint. It delivers a compact, service-oriented building that complements adjacent residential and community-serving land uses. This form of development reflects modern economic land-use efficiency and contributes to the creation of a complete community by co-locating services near homes, parks, schools, and institutional buildings.

Section 2.8.1.1 (e) addresses land use compatibility, particularly the need to provide appropriate transitions between employment areas and nearby sensitive uses. The development has been carefully planned within the BEL zone and is surrounded by a combination of low-density residential areas, institutional uses, and other commercial and employment lands. The building massing, landscaping, access points, and setbacks—all approved through the site plan process—ensure that there are no negative interface impacts. The types of uses being proposed—primarily medical and professional offices—are inherently low-impact and compatible with residential neighbourhoods, fulfilling the PPS objective of mitigating potential land use conflicts.

The Condominium development proposal advances the objectives of Section 2.8.1 of the PPS, 2024 by contributing to a modern, diversified, compact, and strategic employment base. It intensifies employment land in a manner that supports both

economic development and land use compatibility, while offering a flexible, ownership-driven model that meets the long-term needs of businesses and the community. The development is a textbook example of how planning can support economic competitiveness while enabling local service access and resilient urban growth.

The proposed commercial condominium conforms with the Provincial Planning Statement (PPS), 2024 by supporting compact, employment-oriented growth within a designated settlement area. The development makes efficient use of existing infrastructure, provides long-term commercial ownership opportunities, and contributes to a complete community by enhancing access to medical and professional services near residential and institutional areas. Aligned with key PPS sections—including those related to economic development, infrastructure, intensification, employment lands, and land use compatibility—the project promotes investment, supports small business stability, and reinforces the local service economy. It reflects good planning and fulfills the PPS's objectives for sustainable, strategic growth in mid-sized urban centres like St. Thomas

7.3. St. Thomas Official Plan

The City of St. Thomas Official Plan provides a framework for guiding growth and development within the city, with a strong focus on enhancing economic opportunities, promoting sustainability, and ensuring the provision of adequate infrastructure. The St. Thomas Official Plan - Consolidated to OPA 112 (Formatted - October 24 - 2024) is the document that we are going to reference in our report. This was obtained through the Planning Department.

The proposal to register commercial spaces to ownership units as a standard condominium aligns with the following policies:

Policy 4.2.1 The City will continue to support public and private efforts to strengthen and diversity the employment base of St. Thomas. The City will attempt to accommodate, in the most expeditious manner, the expansion plans of existing businesses and to attract new business. Measures that may be utilized by Council include land assembly, provision of municipal services and support of the St. Thomas Economic Development Corporation.

The proposed commercial condominium development at 131 South Edgeware Road aligns directly with Section 4.2.1 of the City of St. Thomas Official Plan (OPA 112, October 24, 2024), which commits the City to supporting both public and private efforts to strengthen and diversify the local employment base.

This policy explicitly encourages facilitating the expansion of existing businesses and attracting new business ventures through strategic measures such as the provision of

serviced land and economic development support. The proposed project conforms to this objective in several important ways.

Firstly, the development introduces a multi-unit, ownership-based commercial building within the City's Business Employment Lands. By offering titled units rather than rental space, it provides healthcare professionals, wellness providers, and service-based entrepreneurs with long-term, stable locations to operate—thereby encouraging business investment and reducing tenant turnover. This model enhances business retention and promotes local ownership, both of which are essential to long-term economic diversification.

Secondly, the project leverages existing municipal infrastructure, including water, sanitary sewer, stormwater systems, and arterial road access. This represents an efficient use of public investment and fulfills the City's stated policy commitment to providing serviced land to support employment-generating development.

Thirdly, the project complements the broader efforts of the St. Thomas Economic Development Corporation by expanding the inventory of market-ready, professional-grade commercial space, particularly in a growing corridor adjacent to residential communities and within proximity of the Volkswagen EV battery plant. These synergies reinforce the City's economic development objectives by supporting small business formation in a format that is both accessible and sustainable.

Lastly, by facilitating the co-location of medical, wellness, and professional services, the project not only strengthens the employment base but also addresses local service needs—ensuring that economic development and community health objectives move forward in tandem. It advances the intent of Policy 4.2.1 by promoting economic resilience, enabling business expansion, and delivering a form of development that can attract and retain small-scale professional and medical enterprises—precisely the types of activities the City aims to encourage.

Policy 5.10.1 states that *“Employment areas play a key role in maintaining, expanding and diversifying the City's employment and assessment base, creating a complete community by providing opportunities for local residents to work in St. Thomas, and furthering the economic development goals of the City.”* Under Policy 5.10.2 the OP outlines certain goals for employment.

By introducing titled ownership units for medical, professional, and wellness-based businesses within a newly constructed, fully serviced commercial building, the project contributes to the supply and functional diversity of employment land (Goal i). It activates underutilized space within an established employment area, ensuring that the City maintains a viable inventory of appropriately located, investment-ready parcels that accommodate evolving demand trends (Goal ii).

The development also respects the intended purpose of employment lands by limiting uses to employment-supportive and ancillary commercial services—such as clinics and

professional offices—that are compatible with industrial and employment operations (Goal iii). These uses enhance worker access to essential services and reinforce the self-sufficiency of employment zones.

Moreover, the project helps diversify employment opportunities (Goal iv) by attracting service-sector professionals, small businesses, and independent practitioners—thereby expanding the range of economic activity within the City. While not industrial in nature, the proposed uses are supportive, compatible, and non-disruptive to existing or future industrial functions (Goal v), and do not conflict with adjacent sensitive uses, given the site’s appropriate buffering and design (Goal vi).

While the project itself is not industrial, it supports broader industrial development goals (Goal vii) by delivering complementary service uses that make industrial and employment areas more viable, attractive, and functional. It contributes to the long-term protection of employment lands (Goal viii) by investing in permanent, ownership-based occupancy rather than temporary leaseholds—fostering stability and reducing land turnover pressures. Lastly, its location along South Edgeware Road, an arterial route with proximity to major transportation corridors, is consistent with the goal of preserving employment lands adjacent to goods movement infrastructure (Goal ix).

The development reflects the City’s broader vision for productive, flexible, and supportive employment land use, ensuring that Business Employment Lands evolve to meet current service demands while remaining resilient and compatible with industrial operations.

With regard to Section 5.11.3 of the OP the project falls squarely within the permitted uses listed under Section 5.11.3.2; meets all site and building design standards under 5.11.3.3 to 5.11.3.5; avoids prohibited or high-impact industrial uses under 5.11.3.6; and supports the Official Plan’s broader employment, urban design, and land use compatibility goals. It therefore represents a well-aligned, policy-supported example of how non-industrial, employment-generating uses can operate successfully within the Business Employment designation in St. Thomas.

Geography	2020	2021	2022	2023	2024
	Rate				
Kingston, Ontario (map)	2.9	1.1	1.1	0.9	3.0
Kitchener-Cambridge- Waterloo, Ontario (map)	2.1	2.0	1.2	2.0	3.7
London, Ontario (map)	3.2	1.7	1.6	1.6	2.7

Figure 14: Vacancy rates

The Official Plan talks of condominium conversion from rental to ownership tenure based on vacancy rates being less than 3% over the last four years. In the London-St Thomas area the vacancy rates are listed above.

However, this is a new commercial building and does not attract the policies of the Official Plan under Sections 6.2.28 and other policies that relate to Housing and Residential Conversions.

There are no specific land use planning policies in Ontario—provincial or municipal—that prohibit or restrict the tenure of a commercial development as a condominium, provided the use of the property conforms to the applicable Official Plan and Zoning By-law. However, several statutes and policies provide procedural, registration, and functional frameworks for commercial condominium tenure, particularly under:

- Condominium Act, 1998 (as amended)

This is the principal legislation that governs the creation, structure, and operation of condominiums in Ontario. Key provisions include Part V that governs the registration of a declaration and description to establish a condominium, including commercial and common element condominiums. Section 8(1) allows the creation of various types of condominiums including Standard Condominiums and Common Element Condominiums, without limiting them to residential tenure. There is no restriction under the Act on a commercial use or tenure, as long as the units comply with municipal zoning.

- Planning Act, R.S.O. 1990, c. P.13

Section 51 and 9(2) of the Planning Act govern the approval of Plans of Condominium. Local municipalities (typically through delegated authority to staff or Council) process condominium applications similarly to subdivision plans. No distinction is made between rental and ownership models in the Act—it is land use and servicing conformity that are considered. For commercial condominiums, a full Site Plan Approval is typically required (even if the building exists), and a Plan of Condominium is required under Section 9(2).

- Provincial Planning Statement (PPS), 2024

While the PPS does not regulate tenure, it, encourages the provision of a diverse range of ownership and employment models (e.g., PPS 2024 Sections 2.1, 2.8), and supports land use patterns that promote economic development and flexibility in employment uses. A commercial condominium format directly supports this by offering affordable entry for small business owners, investment stability, and reduced reliance on volatile leasing markets—all consistent with PPS policy direction.

- Municipal Considerations

In St. Thomas, there are no prohibitions or disincentives in the Official Plan or Zoning By-law regarding commercial condominium tenure. The Plan focuses on permitted uses, servicing, and design compatibility, not tenure type.

In Ontario, the tenure of a commercial building as a condominium is a private ownership structure governed by the Condominium Act, not a planning policy matter, as long as the use conforms to local zoning, the site plan is approved, and the Plan of Condominium complies with Planning Act requirements.

Thus, the proposed commercial condominium at 131 South Edgeware Road is not only permissible but consistent with the OP policies, the Condominium Act, and the Planning Act. The tenure format reinforces Official Plan objectives by facilitating economic investment, employment diversity, and land use efficiency.

7.4. City of St. Thomas Zoning By Law No. 74-2018

The City of St. Thomas Zoning By-law No. 74-2018 regulates land use and development in the city, ensuring that land uses are compatible with surrounding areas and in line with the city's broader planning goals. The subject property is zoned

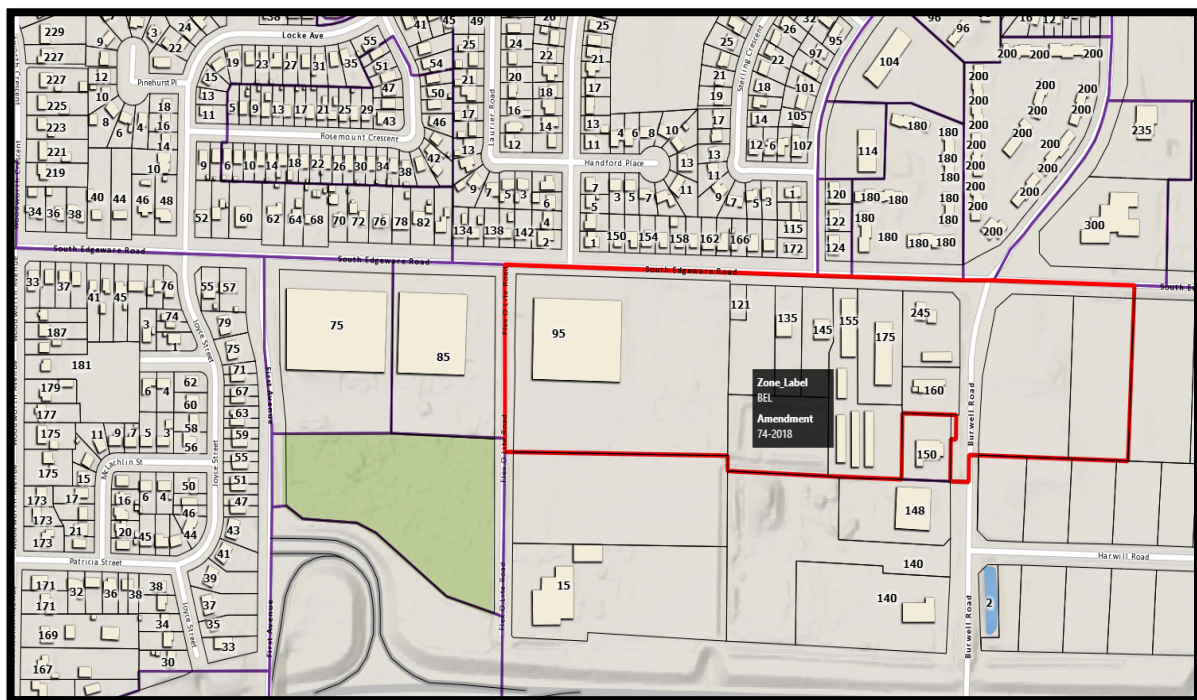


Figure 15: Zoning Designation (Business Employment Lands)

as Business Employment Land (BEL), which permits a wide range of commercial uses, including medical offices, clinics, and other professional services.

The proposed development complies with the zoning by-law, as medical offices and clinics are permitted uses in the BEL zone). The proposed use—dividing a newly constructed commercial building into individually owned professional units (e.g., medical, wellness, and service-based practices)—falls squarely within the list of permitted uses. The building is already constructed and approved under a prior site plan process, and the current application is intended to formalize tenure and finalize site servicing and access agreements.

8. Planning Justification

The proposed registration of the new commercial building at 131 South Edgeware Road to a standard condominium ownership format (with associated exclusive use) for medical offices and clinics represents a thoughtful response to both the city's current needs and its long-term development objectives. This section outlines the planning justification for the proposed development, including an examination of the project's alignment with municipal and provincial policies, its potential impacts on the surrounding community, and its broader contribution to the local economy.

Supporting small business ownership in St. Thomas can also encourage residents to put down deeper roots in the community. As entrepreneurs establish successful businesses, they generate local income, create jobs, and build long-term financial security — key factors that enable and motivate them to purchase homes locally. This not only stabilizes the population but also contributes to a more vibrant, self-sustaining urban environment where people are more likely to stay, invest, and grow with the city.

8.1. Alignment with Provincial and Municipal Policies

As noted in previous sections, the proposed development aligns well with the applicable provincial and municipal policies. Specifically, the Provincial Policy Statement (PPS) and City of St. Thomas Official Plan encourage efficient land use, economic development, and the provision of services that meet the needs of growing communities.

The proposal contributes to a sustainable and compact urban form by making effective use of the site's existing infrastructure. The ownership model of a two-story commercial building allows for the efficient use of available land while providing opportunities for small businesses to secure permanent locations, particularly within the health services sector. This supports the PPS's emphasis on economic diversification and the creation of a resilient, diverse economic base for the city.

Furthermore, the development's proximity to key infrastructure—such as the St. Thomas Elgin General Hospital and other healthcare facilities—enhances its suitability for medical offices and clinics, contributing directly to the health and well-being of the community. The Official Plan of St. Thomas encourages the development of healthcare-related services, particularly in areas that are accessible to a growing and diverse population.

8.2. Supporting Local Economic Development

A significant justification for the proposal is its potential to support economic development within St. Thomas. The type of tenure proposed will have several economic benefits:

- **Stability for Small Businesses:** Ownership offers business owners the opportunity to build equity and reduce reliance on leasing, which can be unpredictable. For healthcare providers, in particular, owning their spaces can lead to long-term financial stability, enabling them to better plan for future growth and invest in the improvement of their premises. This benefits the business owners, the employees they hire, and the community they serve.
- **Job Creation:** The development will directly and indirectly support job creation. The construction and operation of medical office spaces will create employment opportunities, both within the healthcare sector and for those working in supporting industries. Additionally, the Volkswagen electric vehicle battery plant, which is scheduled to open nearby in 2027, will lead to a surge in local employment, further increasing demand for healthcare and other services in the area.
- **Boost to Local Services:** By creating permanent spaces for medical offices and clinics, the development contributes to the growth of essential services within St. Thomas. As the population of the city grows, especially with the influx of workers tied to the Volkswagen plant, the demand for medical services is expected to increase. The development provides an immediate response to this need by offering additional space for healthcare providers.
- **Long-Term Investment:** Ownership helps to secure long-term investments in the city. Business owners are more likely to stay in one location, maintaining stability in both service provision and property management. This long-term investment will contribute to the long-term growth and sustainability of the local economy, which is in line with the city's goals for economic development.

8.3. Economic Growth and Employment Trends

St. Thomas is positioned at the heart of an evolving economic landscape, particularly with the forthcoming Volkswagen electric vehicle (EV) battery plant located near Yarmouth Center Road and Talbot Line. Set to begin production in 2027, this facility is expected to be a major economic driver in the region, creating up to 3,000 direct jobs and an estimated additional 2,000 indirect jobs in the surrounding community.

This large-scale industrial development is expected to:

- Increase the demand for local services, including healthcare, retail, and professional services.
- Attract workers and their families, resulting in population growth and a need for additional housing, commercial spaces, and services.
- Drive regional economic development, stimulating growth in related sectors such as manufacturing, logistics, and support services.

The location of the subject site near the Volkswagen plant will make it an ideal location for businesses supporting the workers and new residents in the area. With healthcare being one of the critical services needed to accommodate this new economic expansion, the demand for medical offices and clinics is expected to increase substantially.

8.4. Healthcare Demand and Service Gaps

St. Thomas and the broader Elgin County region have faced significant healthcare challenges, particularly concerning access to primary care. As of recent data, approximately 7,000 residents in Elgin County lack a family doctor. This shortage has led to increased pressure on emergency departments and walk-in clinics, as individuals without a primary care provider seek medical attention during urgent situations.

In response to this issue, the Elgin Community Health Hub was established in September 2024 at 230 First Avenue in St. Thomas. This clinic aims to serve around 10,000 residents without a primary care provider and another 20,000 who are attached to providers outside the county.

The healthcare sector in St. Thomas is currently expanding, with several medical and community health services located within close proximity to the subject site, including:

- St. Thomas Elgin General Hospital, which has been undergoing ongoing expansions to meet the increasing healthcare needs of the region.
- Windemere Family Medical Centre, St. Thomas Walk-in Medical Clinic, and Elgin Community Health Hub, which provide critical primary care, specialty services, and community health services.

In addition to these established healthcare providers, the anticipated population growth due to the influx of workers and new residents will place additional pressure on local healthcare services. This increase in demand will create a need for more medical office space and clinics to serve the growing population.

The conversion of the commercial building into a condominium structure, offering medical office units for purchase, will help to meet this demand by providing stable, long-term spaces for healthcare practitioners. The proximity to the St. Thomas Elgin

General Hospital and other medical facilities will make this site an ideal location for healthcare professionals who want to establish practices near the hospital or serve the growing community of workers and residents.

8.5. Compatibility with Adjacent Land Uses

The proposed development is compatible with the existing and planned land uses in the area. The subject site is located within an established Business Employment Land (BEL) zone, which permits a variety of commercial and light industrial uses. The adjacent land uses include:

- **Residential Uses to the North and West:** The proposal involves converting a commercial building into medical offices and professional services, which are compatible with the residential areas to the north and west. Medical services are generally seen as compatible with residential areas because they provide necessary services for residents and contribute to the vibrancy of the local neighborhood.
- **Commercial Properties to the South:** To the south of the property, the land is developed with commercial, which are consistent with the proposed use of the site. The conversion to condominium ownership will likely help to stabilize the area by reducing turnover in tenants and encouraging long-term investments in the properties.
- **Institutional and Community Uses:** The site is located near several important community and institutional services, including the St. Thomas Elgin General Hospital, medical centers, and community support services. This strengthens the site's role as a hub for healthcare services, benefiting from the surrounding medical and community infrastructure.

The zoning by-law's provision for a wide range of commercial and service-oriented uses within the BEL zone ensures that the proposed development is compatible with surrounding land uses. Moreover, the proposal will not result in significant adverse impacts on neighboring properties. The development respects existing setbacks, parking requirements, and landscaping guidelines, contributing to a harmonious integration with the surrounding area.

In conclusion, the proposed condominium ownership tenure for medical offices and professional services is a sound planning decision that aligns with provincial and municipal policies. The project supports the growth of small businesses and healthcare services, contributes to the local economy, and enhances the sustainability and vibrancy of the area.

The proposal is well-positioned within the Business Employment Land zone, where it will serve as a long-term investment opportunity for small business owners. It supports

the broader goals of economic diversification, community health, and sustainable urban growth. With careful consideration of the surrounding land uses and a commitment to minimizing impacts, the development will be a valuable addition to the City of St. Thomas, supporting its evolving needs and contributing to its future prosperity.

8.6. Demand for Ownership Units in Commercial Developments

The demand for ownership-based commercial units, particularly in areas with emerging economic growth and demographic shifts, is on the rise. Small business owners and professionals, especially in sectors like healthcare, benefit from the long-term stability and financial predictability that ownership provides. The proposed shift from rental to ownership models is aligned with the following trends:

Ownership Stability: Many businesses prefer to own their commercial spaces because it offers long-term financial stability. With ownership, businesses can build equity over time, reduce operating costs associated with renting, and have greater control over their premises. This is particularly important for medical professionals, whose businesses require consistent, accessible locations to establish long-term patient relationships. In addition, healthcare practices typically have high overhead costs, which can make renting financially burdensome—especially for smaller clinics or those in underserved areas.

Reducing Leasing Uncertainty: Businesses that rent their spaces are often subject to market fluctuations and the potential for sudden lease terminations or increases in rental rates. Ownership provides businesses with a sense of security, enabling better long-term planning and investment in their facilities.

Investment and Asset Building: Commercial ownership allows small businesses to accumulate wealth and secure financing for growth. This is an important aspect for healthcare providers, medical offices, and personal services to consider, as these businesses often require long-term investments in equipment, infrastructure, and patient services.

Attracting High-Quality Tenants: A well-maintained, ownership-based building will attract stable, high-quality tenants who are committed to maintaining their premises. The ability to control property conditions, as well as avoid sudden lease changes, fosters long-term tenant stability.

By converting the commercial space to ownership units, the developer is aligning with market demands for predictable, high-quality spaces for businesses and healthcare providers. The medical clinic/office space in the subject building is poised to meet the growing demand for healthcare services driven by the nearby population expansion, thus offering a prime investment opportunity.

9. Conclusion

The proposed application for a Draft Plan of Condominium to register a Standard Condominium with certain exclusive uses is a forward-thinking initiative that demonstrates sound land use planning, clear alignment with applicable policy frameworks, and a strong commitment to fostering long-term economic and community benefits within the City of St. Thomas. The project aligns with the key principles of the Provincial Policy Statement (2020), particularly its emphasis on promoting economic competitiveness, supporting diversified employment opportunities, and encouraging compact, efficient, and strategically located development. By utilizing an already approved and constructed two-storey commercial building, the proposal leverages existing infrastructure and urban form to maximize the site's potential without requiring additional development or intensification.

From a municipal planning perspective, the project conforms fully with the City of St. Thomas Official Plan and Zoning By-law No. 74-2018, which both recognize the value of mixed-use employment areas and prioritize the integration of healthcare, professional services, and small business operations within designated Business Employment Lands. The owner's preference to sell individually owned commercial condominium units allows the development to offer more permanent, stable, and flexible options for medical professionals and service-based businesses who are seeking long-term locations for their practices. This change in tenure model—from leased to owned—will reduce market uncertainty for practitioners, encourage sustained investment in the property, and foster the long-term success of tenants who can now become property owners.

This proposal also responds proactively to broader regional economic trends, including the impending launch of the Volkswagen electric vehicle battery plant, which is projected to create thousands of new jobs and catalyze substantial residential and commercial growth throughout St. Thomas and the surrounding region. The influx of workers and their families will increase demand for essential community services—particularly healthcare. The proposed development is ideally located within a growing medical and commercial corridor, in close proximity to St. Thomas Elgin General Hospital, several medical clinics, and established transit and transportation routes. As such, the subject property is exceptionally well-positioned to contribute meaningfully to meeting the expanding healthcare needs of the community, while also supporting complementary services such as personal care, professional offices, and retail.

In terms of land use compatibility, the subject site is well integrated within a mixed-use context that includes adjacent residential neighborhoods, commercial developments, and institutional uses. The proposed ownership tenure does not involve any changes to the approved site plan or building form, meaning that the physical footprint, massing, parking layout, landscaping, and accessibility provisions remain unchanged. This ensures that there are no adverse impacts to surrounding properties or infrastructure,

while maintaining a high level of compatibility and visual coherence with nearby developments.

Moreover, ownership enables practitioners to build equity, better manage operational costs, and invest in space improvements over time—all of which contribute to the professionalization, quality, and continuity of services offered to the community. These advantages are especially critical in the healthcare sector, where consistent patient relationships, location branding, and long-term accessibility are vital.

In conclusion, the proposed change in tenure for the development at 131 South Edgeware Road represents an appropriate, policy-supported, and economically beneficial evolution in land use. It not only reflects the planning principles outlined in provincial and municipal policy documents but also directly supports the City of St. Thomas's broader goals for economic growth, employment intensification, and community health. By enabling stable ownership opportunities for medical and service-based professionals, the development enhances the long-term sustainability of the local business community, improves access to essential services, and strengthens the city's capacity to accommodate the next phase of regional growth. It is recommended that this proposal be approved as it represents good planning, is in the public interest, and will have a lasting, positive impact on the community.

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