STRIK BALDINELLI MONIZ

PLANNING • CIVIL • STRUCTURAL • MECHANICAL • ELECTRICAL

AMENDED PLANNING JUSTIFICATION REPORT

OFFICIAL PLAN AMENDMENT & ZONING BY-LAW AMENDMENT

9784 Sunset Drive
CITY OF ST. THOMAS

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SBM-24-2689	September 2, 2026



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September 2, 2026 SBM-24-2689

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RE: Planning Justification Report – 9784 Sunset Drive, St. Thomas
Official Plan Amendment and Zoning Bylaw Amendment Application

Strik, Baldinelli, Moniz Ltd. has been retained by VKS Sunset Plaza Inc. to coordinate the preparation and submission of applications for Official Plan and Zoning By-law Amendments for the property municipally known as 9784 Sunset Drive in the City of St. Thomas. The applications would permit the development of the property for commercial uses.

This document is an amended version of the Planning Justification Report submitted on April 24, 2026 as part of the complete application package for the Official Plan and Zoning By-law Amendments. On May 13, 2026, the City issued a Notice of Incomplete Application requesting, in addition to the materials already submitted, a parking study and an updated Planning Justification Report that includes an assessment of the City's Commercial Market Study and urban design guidelines. This amended report responds to those requirements and provides an updated review of the proposed development within the applicable planning policy framework.

It is our opinion that the proposal represents good planning and advances the land use goals and vision of the City of St. Thomas Official Plan.

Respectfully submitted,

Strik, Baldinelli, Moniz Ltd.
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1. INTRODUCTION

This Planning Justification Report has been prepared by Strik, Baldinelli, Moniz Ltd. in support of an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) application that is being brought forward by VKS Sunset Ink. (the "Applicant") to permit a commercial development consisting of:

- 1 commercial building containing 8 units.
- 1 commercial building containing 2 units; 1 of which is to be the anchor food store; and
- 2 quick service restaurants.

The purpose of this report is to evaluate the proposed development within the context of the existing land use policies and regulations, including the Provincial Planning Statement, City of St. Thomas Official Plan and Zoning By-law. The proposed development aligns with the City of St. Thomas' land use goals by supporting appropriate commercial growth, efficient land use, complete and functional communities and represents sound land use planning principles.

2. SITE DESCRIPTION

The subject site is municipally addressed as 9784 Sunset Drive and located in the northwest edge of the City of St. Thomas, bordering Talbotville. The rectangular shaped, 1.33-hectare lot occupies a prominent corner location with frontage on Sunset Drive (Highway 4), intersecting with Major Line Road, providing direct connectivity to Highway 401 and the broader regional transportation network. Currently the site consists of a two-storey single detached residential dwelling, a detached garage and barn which is intended to be demolished to facilitate the proposal. The site is generally flat and underutilized with no significant natural heritage features, representing an appropriately suited site for redevelopment.



Figure 1. View of Subject Site facing Northwest on Major Line
Source: Royal Lepage



Figure 2: Aerial Image of Subject Site
Source: St. Thomas Mapping



Figure 3: Image of Subject Site, Facing East on Sunset Drive
Source: Google Streetview



Figure 4: Image of Subject Site, Facing North on Major Line
Source: Google Streetview

3. SURROUNDING LAND USES

The surrounding context of the subject site is characterized by a mix of commercial uses along the Sunset Drive corridor including auto-oriented uses such as gas bar, auto sales, lodging accommodations as well as vacant future residential lots, natural heritage and low-density residential uses further beyond the immediate surrounding corridor. The subject site reflects the area's function as an evolving commercial node intended to serve the existing local and future residents and travelling public. Below is a summary of surrounding land uses, which is also depicted in **Figure 5.**

North: Holding Provision h1 Residential Development (h1 HR7-6) Zone, currently vacant.

Highway Commercial Zone (C7-15), Gas Station.

West: Across Sunset Drive is the Elgin Animal Hospital, located within Talbotville in the Township of Southwold, Elgin County, outside the City of St. Thomas municipal boundary. The property is zoned Residential 1 (R1). Farther west are vacant lands zoned Settlement Reserve (SR) for future comprehensive development. These lands are also within the conservation authority's regulated area.

East: Holding Provision h1 Residential (h1 HR7-6) Zone, vacant.

South: Natural Heritage (NH) consisting of natural environment, development is not permissible on these lands.

Highway Commercial Zone (C7-16) Zone

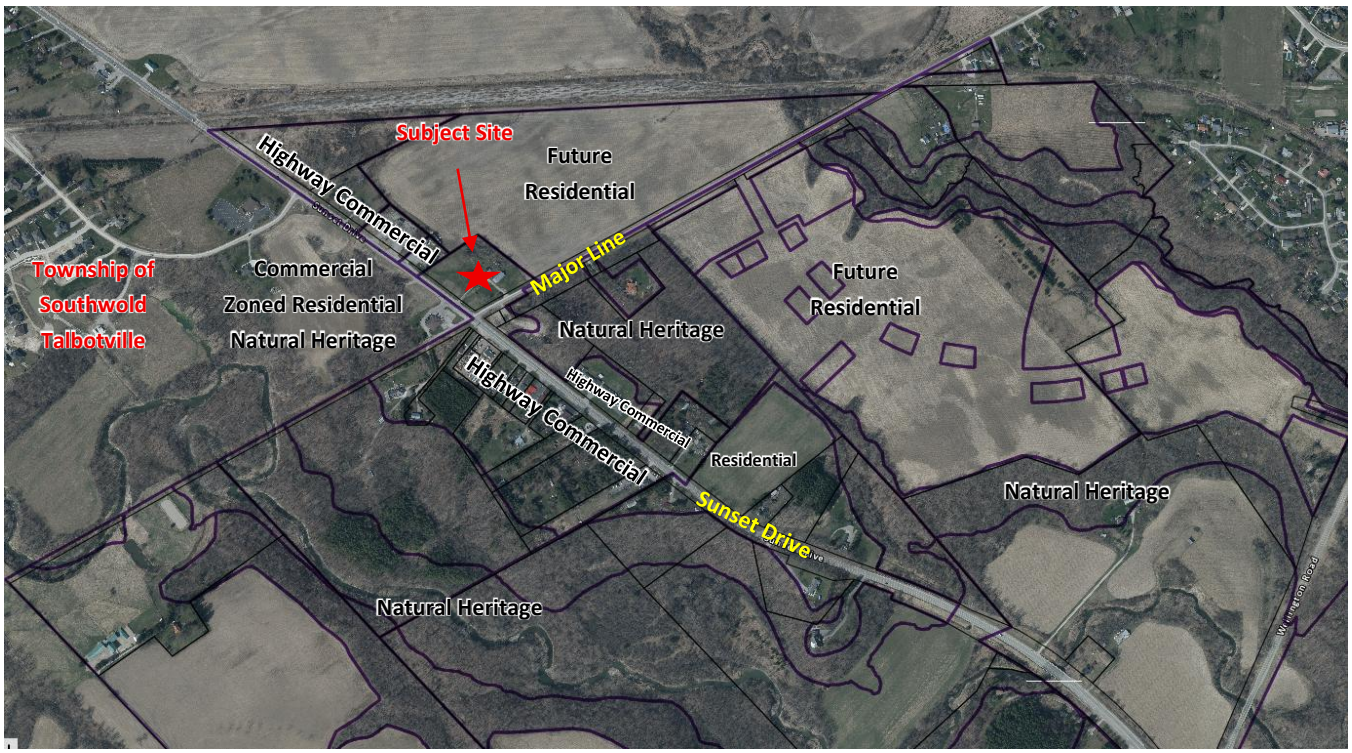


Figure 5. View of Subject Site within Surrounding Area Context
Source: City of St. Thomas Mapping

4. DEVELOPMENT CONCEPT

The applicant is proposing to demolish the existing residential dwelling, detached garage and barn on and construct a commercial development on the subject site which consists of two (2) multi-unit commercial buildings and two (2) standalone quick service restaurants supported by three (3) access points and a coordinated internal drive aisle network. Below is a breakdown of the key elements of the Preliminary Site Plan (**Figure 6).** Elevations are shown in Figure 7-10.

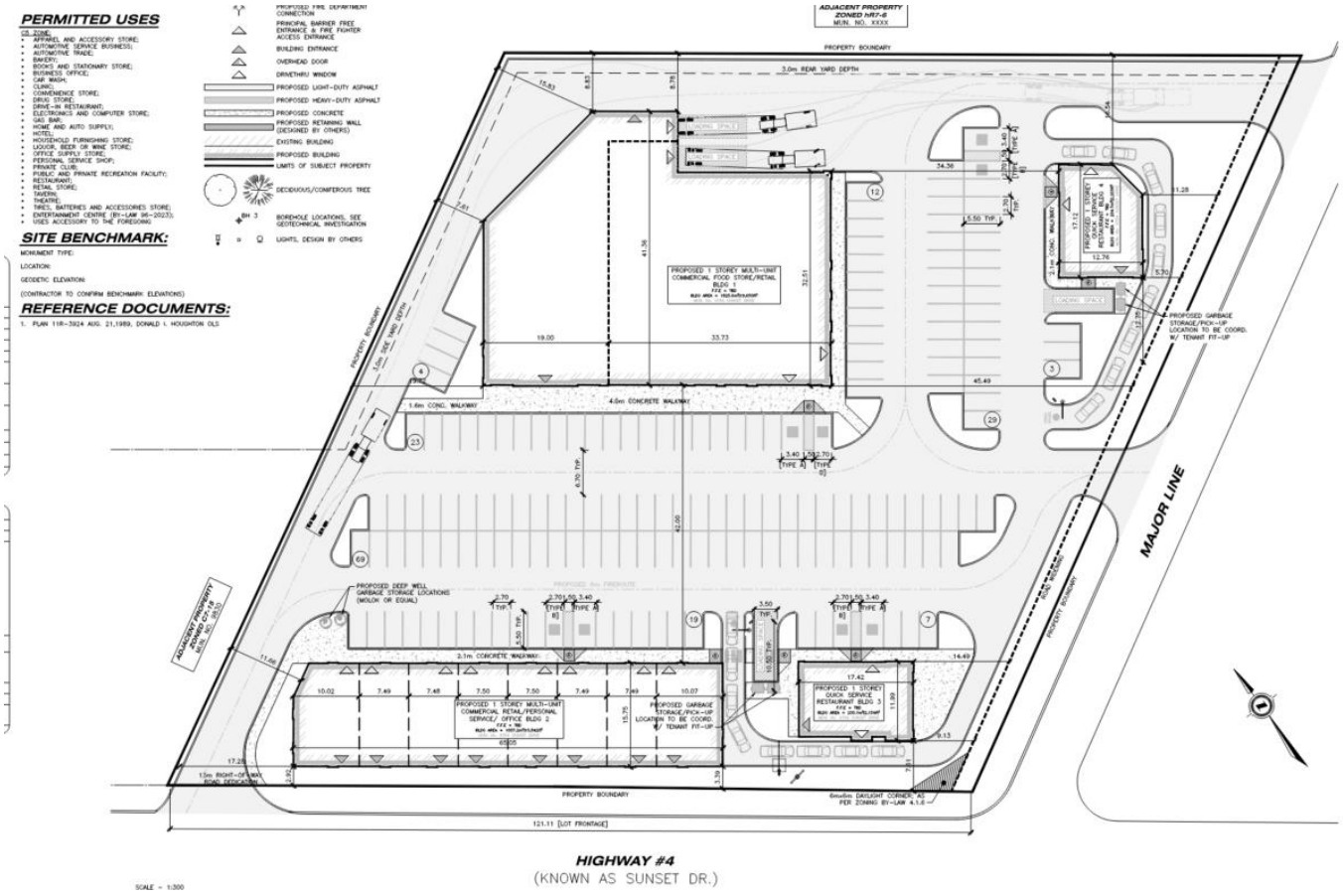


Figure 6. Conceptual Site Plan
Source: SBM Ltd.



Figure 7. Elevations and Isometric View of Multi-Unit Commercial Building 1
Source: SBM Ltd.



Figure 8. Elevations and Isometric View of Multi-Unit Commercial Building 2
Source: SBM Ltd.



Figure 9. Elevations and Isometric View of Quick Service Restaurant Building 1
Source: SBM Ltd.



Figure 10. Elevations and Isometric View of Quick Service Restaurant Building 2
Source. SBM Ltd.

Building 1 (8-Unit Commercial Building)

- Building is located in the southern portion of the site, fronting Sunset Drive (Highway 4) with vehicular access provided by both Major Line and Sunset Drive.
- Building area totals 1,007.2 m^2 (10,842 ft^2).
- 8 tenant 1-storey units provided for commercial retail, personal service and office uses.
- Two entrances are provided to each unit located on the south and north side of the building.
- 2.1 Concrete walkway provided for convenient and safe pedestrian pathways into each commercial unit.

Building 2 (2-Unit Commercial Building)

- Building is located in the North corner and focal point of the site with direct access to the main parking area and internal drive aisle.
- 1-Storey anchor building of the site with one unit being a food store and the other unit dedicated for a retail tenant.
- Building area totals 1,923.4 m^2 (20,704 ft^2)
- Two entrances are provided to the building directly from the parking lot and pedestrian walkway.
- 2 Loading spaces are provided at the rear of the building, providing safe and convenient access.

2 Standalone Quick Service Restaurants

- One quick service restaurant is located in the southeast corner of the site, while the other is located in the northeast corner.
- The southeastern restaurant has a building area of 200.1 m^2 (2,154 ft^2) and 8 stackable parking spaces.
- The northeastern restaurant has a building area of 199.6 m^2 (2,148 ft^2) and 9 stackable parking spaces,
- Existing trees along the site perimeter are to be maintained where possible.
- Both restaurant buildings provide a functional and convenient loading space.

Access, Internal Drive Aisles, Parking Layout and Pedestrian Connectivity

- Vehicular access to the site is provided by three access points including:
    - One access point from Sunset Drive (Highway 4); and
    - Two access points from Major Line Road
- A connected system of internal drive aisle provides continuous movement throughout the site, linking all access points, parking areas and buildings. The proposed sit layout allows for adequate access and manoeuvrability for all its intended purposes including emergency services, service vehicles and waste collection. These areas are strategically located in areas that minimize visibility from public streets and avoid interference with primary circulation routes.
- A large, centralized surface parking area is located internal to the site and serves all proposed buildings. Additional surface parking is provided in the northern area of the site plan between Building 2 and the quick service restaurant. The strategic location of the surface parking ensures that the commercial buildings have proper siting and orientation from the road as well as promotes pedestrian-oriented commercial frontages.

- Pedestrian access is provided by walkways throughout the site connecting parking areas to building entrances. The layout ensures safe and direct pedestrian movement with building entrances oriented toward parking areas.

5. PRE-APPLICATION CONSULTATION

A pre-application consultation was held on May 13, 2025, with The City of St. Thomas to discuss the proposed development. The preliminary site plan was reviewed, and it was determined that an Official Plan Amendment and Zoning By-law Amendment would be required. It was determined that the Minor Commercial Official Plan Designation would be most appropriate for the proposed uses, and a Planning Rationale would be required. Additionally, as part of the submission, a servicing feasibility study would be required to ensure adequate servicing is available to support the propped development. The consultation team has reviewed the Record of Pre-consultation and has addressed staff comments within this report and submission materials.

6. SUPPORTING STUDIES

6.1. STAGE 1-2 ARCHAEOLOGICAL ASSESSMENT

Lincoln Environmental Consulting Corp. (LEC) was retained to complete a Stage 1-2 archaeological assessment of 9784 Sunset Drive to meet the requirements of the *Planning Act* in support of the Official Plan and Zoning By-law Amendments.

The stage 1 archaeological assessment of the subject site determined that the study area exhibited a high potential for the identification and recovery of archaeological resources, and as such, a Stage 2 archaeological assessment was completed. The Stage 2 assessment was conducted on November 20th, 2025, which measured approximately 1.29 hectares in size. Test pit sampling was conducted where each test pit was at least 30 centimetres in diameter and excavated. The soils and test pits were then examined for stratigraphy, cultural features, or evidence of fill. The results of the testing determined that no archaeological resources were identified and as such no further archaeological assessment of the property was recommended. The report was submitted to the Ministry of Citizenship and Multiculturalism and has been entered into the Ontario Public Register of Archaeological Reports.

6.2. FEASABILITY SERVICING BRIEF

A servicing Feasibility was completed by Strik, Baldinelli, Moniz Ltd. (SBM) dated March 18, 2026. Below is a summary of the findings:

Water Servicing:

- Based on the Sandymount Subdivision Engineer drawings prepared by CJDL Consulting Engineers, a future watermain is proposed in the Major Line ROW. It is proposed that the proposed commercial development is to be serviced with a water service connection to the future 300mm diameter watermain in the Major Line ROW. The brief concludes that the maximum day demand and the maximum hour demand can be adequately serviced by the future connection.

Water Supply for Fire Protection:

- Based on current OBC requirements, a fire hydrant should be located 45m from the fire fighters' location, and since there are no existing nor future hydrants located within the 45m of the subject site, a new on-site hydrant(s) is required. The location(s) will be determined at the time of a detailed design for approval.

Sanitary Servicing:

- Based on the Sandymount Subdivision Engineer drawing prepared by CJDL Consulting Engineers, a future 200 mm diameter sanitary sewer is planned within the Major Line ROW. The proposed development will be serviced by a new 200 mm sanitary connection to this future sewer on Major Line. The brief indicated that the anticipated sanitary extra flow of the proposed development will not create capacity issues in any of the sewers.

Storm Servicing and Stormwater Management:

- The analysis determined that the proposed development will increase stormwater runoff relative to existing conditions and will require stormwater management controls to reduce post-development flows to acceptable pre-development levels. Detailed stormwater management quantity and quality controls will be completed at the time of detailed design for approval.

Based on the Feasibility Servicing Brief, the proposed servicing connections have sufficient capacity to accommodate the commercial development. Additional detailed design will be reviewed and confirmed through the Site Plan Approval application review process prior the execution of a development agreement.

6.3. ISSUES SCOPING REPORT

An Issues Scoping Report was completed by Strik, Baldinelli, Moniz Ltd. (SBM) dated March18, 2026. Below is a summary of the findings.

The ISR was required since the proposed development is within 120m of a natural heritage feature (wooded area). Field surveys were conducted to determine the features of the site boundary, while the desktop review assessed the potential impacts. The findings indicated that no significant impacts are anticipated on the nearby natural heritage features, and as such, the proposed development can proceed without the need for an Environmental Impact Study. However, mitigation measures are recommended to avoid potential harm to protected wildlife that may be on the site and to minimize additional degradation of water quality downstream in Dodd Creek:

- Vegetation clearing and removal of the cedar barn and secondary buildings is to occur between October 1 and March 30 of any given year.
- Incorporate onsite water quality control measures into the site design.

Based on the Issues Scoping Report, the review supports the proposed development as no significant features were identified on the subject site and any potential impacts can be appropriately addressed through mitigation and detailed sign design.

6.4. PARKING STUDY

A Parking Study was conducted by Paradigm Transportation Solution in July 2026 which assessed the adequacy of the proposed parking supply for the subject development.

The Study concluded that "*The proposed parking supply is consistent with parking requirements in other nearby/similar municipalities and exceeds the forecast demand based on ITE rates and parking surveys completed at similar developments in St. Thomas, Fergus and Woodstock".*

Based on the study*, "the proposed parking supply is adequate for the subject development, and the development should be considered for approval as proposed.*"

6.1. CITY OF ST THOMAS COMMERCIAL MARKET STUDY

The City of St. Thomas Commercial Market Study, undertaken by Watson & Associates in May 2025, indicates a critical shortage of designated commercial land, with a projected net deficit of 24 hectares (59 acres) needed by 2051 to support rapid population growth.

Additionally, the report assesses that food store retail and restaurants remain highly dependent on physical brick-and-mortar storefronts, even with the increase in the e-commerce market.

The subject lands are located next to S.A.B.E Area #1, which is identified by the Study as a key opportunity to provide commercial support to communities along the western side of the City. The Study highlights that these western communities are currently separated from the rest of the City due to natural topographical features. Furthermore, the Study identifies the Sunset Drive corridor as a strategic opportunity for the City to consider redevelopment to promote additional commercial trade oriented beyond the immediate local area, taking into account the surrounding municipalities such as Southwold and Central Elgin. The Study identified for this area: opportunities for mid-size grocery store; potential commercial node which would include health care stores, food services, and retail outlets for beer, wine and liquor, in addition to a variety of personal service and medical/health care providers.

Nevertheless, a significant portion of the area designated as S.A.B.E Area #1 is actively being developed into residential uses, including approximately 200 single-detached houses, 8 townhouse blocks, and two high-density residential blocks within walking distance of the subject lands.

The proposed commercial area will directly support this incoming residential population and will partially fulfill the necessary provision of commercial land identified in the market study. The mix of the proposed uses—such as retail, restaurant, and the anchor grocery store—is entirely compatible with the surrounding residential context."

7. PLANNING POLICY FRAMEWORK

7.1. Provincial Planning Statement

The Provincial Planning Statement (PPS, 2024) issued under the authority of Section 3 of the Planning Act "*provides policy direction on matters of provincial interest related to land use planning"* in order to ensure efficient, cost-efficient development and the protection of resources. The proposed development is consistent with the PPS and more specifically supports the following policies:

PPS 2024 Policy	Response
2.3 Settlement Areas and Settlement Area Boundary Expansions 2.3.1 1. Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas. 2. Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities	The proposed development is within the St. Thomas Settlement Area and designated "Major Commercial" in Schedule "A" City of St. Thomas Land Use Plan and is projected to support growth in this area. The development will use and optimize existing and planned municipal infrastructure such as municipal roads, water and sanitary services.
2.4 Strategic Growth Areas 2.4.1 1. Planning authorities are encouraged to identify and focus growth and development in strategic growth areas. 2. To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned: a) to accommodate significant population and employment growth. 3. Planning authorities should: b) identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas.	The proposal directs the commercial development to a strategic growth area within St. Thomas where commercial uses are encouraged. The development is in a location where existing services such roads and utilities existing and where water and sanitary services are proposed. The project contributes to economic development by introducing commercial uses and employment opportunities within the settlement area and accommodates population growth within a settlement area. The development is an appropriate type and scale for a strategic commercial corridor which fronts Sunset Drive which is designated as a Highway and Major Line which is designated as being a Minor Collector Road within the St. Thomas Official Plan. The site us capable of accommodating the proposed range of uses and the overall site design ensures compatibility with adjacent land uses by strategic building placement, setbacks and placement of parking and access areas.
3.6 Sewage, Water and Stormwater 2. Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection o the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.	The proposed development will utilize future planned municipal services. A servicing feasibility has been submitted under separate cover which provides detail regarding future proposed service extensions.

Based on the analysis above, the proposed development is consistent with the applicable policies of the Provincial Planning Statement 2024, as it supports the orderly and efficient development of the subject site for commercial purposes, contributes to the range of services and employment opportunities available to the existing and future community.

7.2. City of St. Thomas Official Plan

The St. Thomas Plan provides a long-term framework for the efficient use of land within settlement areas and supports commercial development in appropriate locations while protecting the natural and built environment. Within the Official Plan, the subject site is designated 'Highway Commercial' per Schedule "A", City of St. Thomas Land Use Designations (

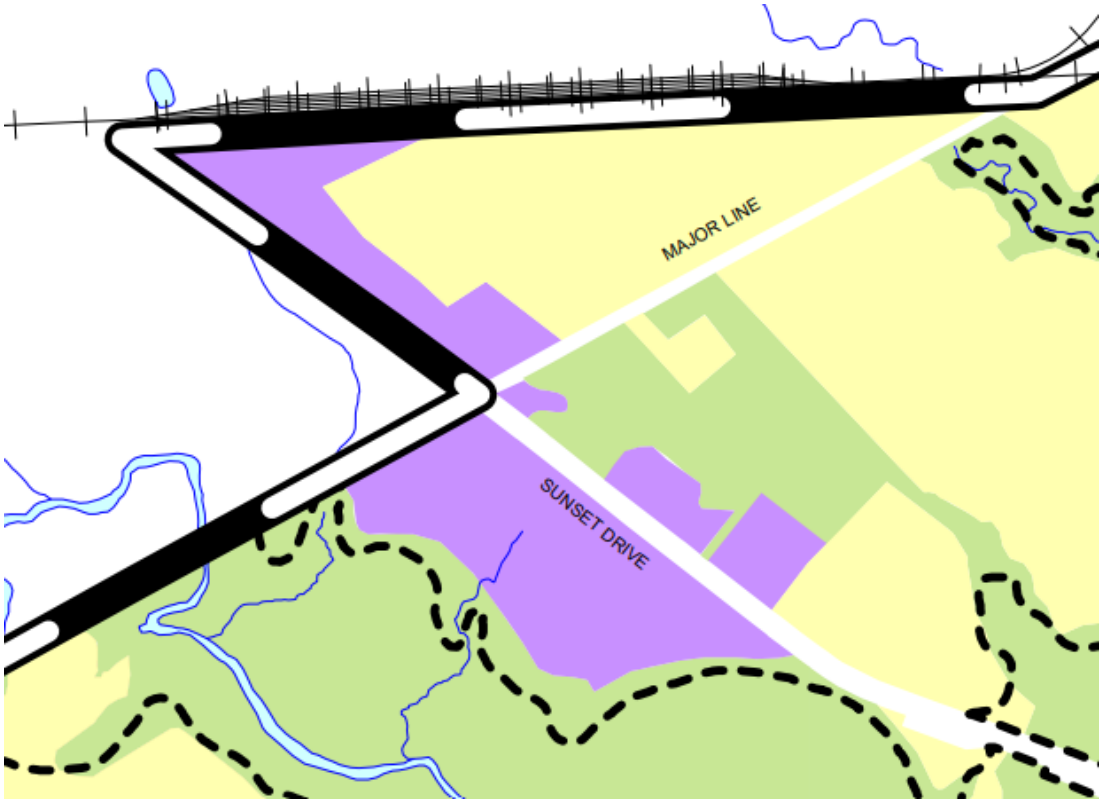


Figure 11). The Highway Commercial Policies in Section 5.8.3.1 permit uses that serve the needs of City residents and business and the needs of the traveling public such as hotel/motel, automotive service business, gas bar, car wash, convenience store, automotive maintenance garage, existing food and retail stores etc. The proposed multi-unit commercial buildings uses such as retail, personal service, office, food store and quick service restaurants are not permitted uses within the Highway Designation, and as such, an Official Plan Amendment application is being brough forward.

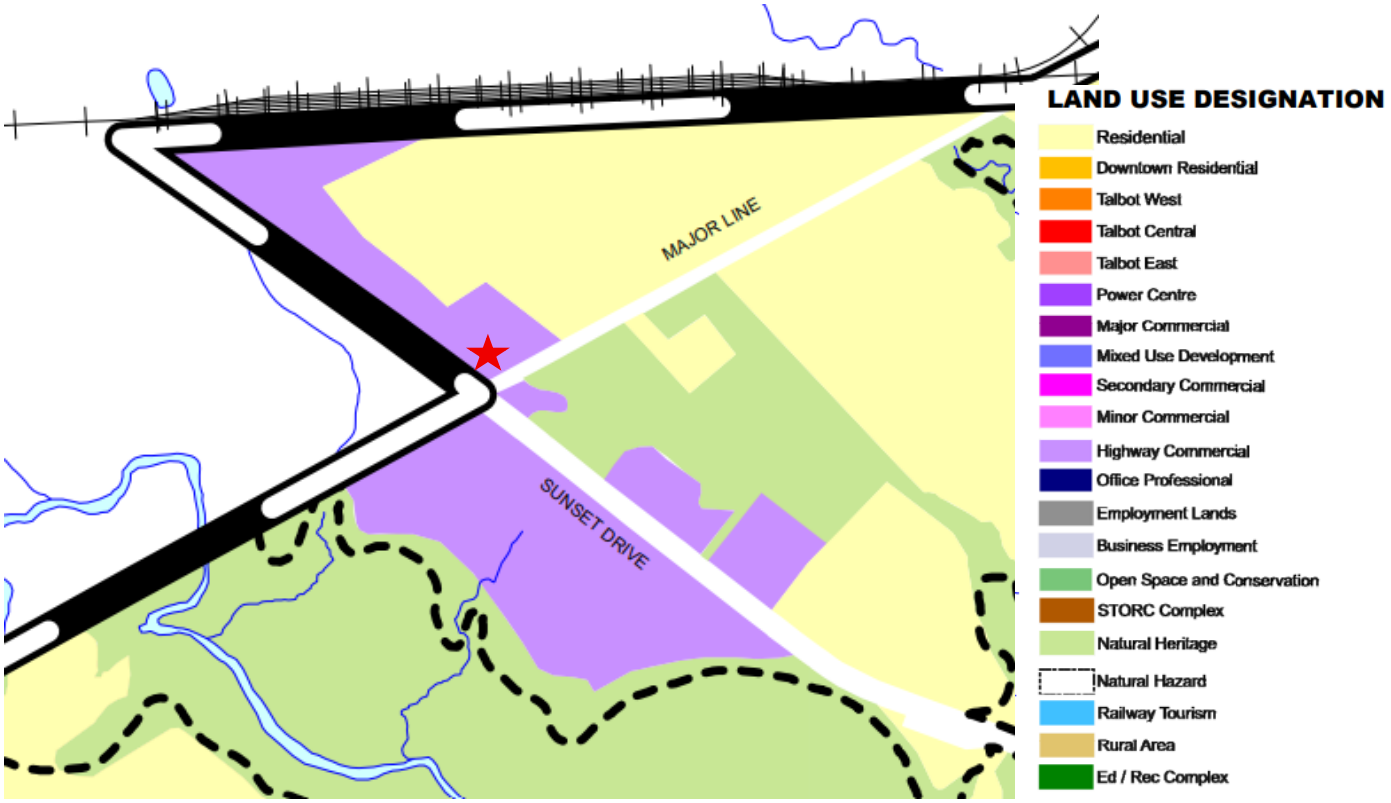


Figure 11: City of St. Thomas Official Plan, Schedule 'A' – Land Use Designation
Source: St. Thomas Official Plan

7.2.1 City of St. Thomas Official Plan– Policy Analysis

The proposed development is consistent with the St. Thomas Official Plan and more specifically supports the following policies:

City of St. Thomas Official Plan	Response
4.3.2 Land Structure The retail structure of St. Thomas will have the following components: vi)Minor Commercial areas in arterial/collector road locations across the City serving the day-to-day retail and service commercial needs of the surrounding residential areas. Local commercial facilities located within residential neighbourhoods providing limited retail convenience goods.	While the subject site is located on a corner lot, fronting a 'Highway' and 'Minor Collector; the site is appropriately situated to support Minor Commercial uses that serve the surrounding existing and planned residential area for day-to-day commercial needs, such as groceries, banking, and other personal service needs.
5.7.3 Policies – Minor Commercial 5.7.3 Permitted uses in the "Minor Commercial" designation include retail and service uses of a convenience or day-to-day nature with no single use exceeding 300 square	The proposed development is anticipated to provide a range of neighbourhood-serving retail and service uses that meet the day-to day needs of the surrounding and planned residential community. The inclusion of a food store supports

City of St. Thomas Official Plan	Response
metres in size. Examples of these types of facilities are a convenience store, hairdresser, barber, bank, bakery, and restaurant. Offices uses and a clinic are also permitted.	convenient access to groceries and essential goods, contributing to complete communities. The scale and function of the development remain appropriately oriented to the local context, with a mix of smaller commercial units anchored by the food store. While the proposed food store exceed the 300 m^2 size threshold, it continues to function as a neighbourhood-serving use and does not represent a large-format or destination commercial use.
5.7.3.2 Applications for approval of a minor commercial use shall be reviewed on the basis of conformity with the following policies: i) the site shall be located on an Arterial Road, preferably at the intersection with a collector road as shown on Schedule "B" to the Official Plan; ii) a new minor commercial use shall not be permitted at the intersection of two Arterial Roads as shown on Schedule "B" to the Official Plan; iii) a new minor commercial use shall not be permitted on a minor collector or a local road as shown on Schedule "B" to the Official Plan; iv) the access to and traffic generated by the site shall not create traffic hazards on abutting roads; v) the buildings containing minor commercial uses shall be designed to a high architectural and landscape standard to blend in with and/or compliment the character of the adjacent residential areas; vi) the site area shall be adequate to incorporate the necessary landscape screening or buffering to minimize potential impacts on the surrounding residences; vii) lighting and signage shall not create an adverse visual impact on the surrounding residences; viii) garbage collection/storage areas shall be located and screened to minimize any adverse impacts on surrounding uses;	The subject site has frontage on a highway (Highway 4, Sunset Drive) and a Minor Collector (Major Line) providing a high degree of visibility and accessibility appropriate for neighbourhood-serving commercial uses. While the site is not located at the intersection of an arterial and collector road, the highway functions similarly in accommodating traffic and supporting commercial activity, and the site is not situated at the intersection of two arterial roads, consistent with Policy ii). Although the site includes frontage on a Minor Collector, it is not solely reliant on lower-order roads and also fronts a highway, addressing the intent of Policy iii). The proposed access points and internal site design have been configured to ensure safe and efficient traffic movement and are not anticipated to create hazards on adjacent roads consistent with Policy iv). The proposed development will be designed to achieve a high standard of architectural which will compliment the surrounding character and planned residential uses. The site is sufficiently sized for adequate buffering and screening along property boundaries, minimizing potential impacts which will be finalized at the site plan stage. Lighting and signage will be sensitively designed and oriented to prevent adverse visual effects. Deep well garbage storage is proposed and appropriately located to mitigate nuisance impacts. No outdoor storage of goods or material is proposed as part of this site plan.

City of St. Thomas Official Plan	Response
ix) no outside storage of goods or materials shall be permitted; x) adequate off-street parking shall be provided.	The parking supply is appropriate for the nature and scale of the proposed uses and will be further analyzed in the zoning regulations section of this report.
5.7.3.5 The maximum total gross leasable floor space available for all commercial or office uses in any area designated "Minor Commercial" shall be 2300 square metres.	The proposal is requesting to increment the maximum total gross leasable floor space to 3500 square metre. However, the proposal is maintaining the character of the "Minor Commercial" designation by providing essential, daily food security and retail options within walking or short-driving distance of the surrounding residential/planned residential use. Additionally, the increased gross leasable area, along with its associated parking and loading requirements, can be entirely accommodated on-site without causing adverse traffic or visual impacts on adjacent low-density residential uses.

It is the opinion of the writer that the proposed development supports the goals and policies of the City of St. Thomas Official Plan by supporting complete communities through the provision of neighbourhood-serving commercial uses that support the day -to-day needs of the existing and planned residential area.

7.2.1 Proposed Official Plan Amendment – Schedule 'A" St. Thomas Land Use Designation

The Applicant is seeking an Official Plan Amendment to redesignate the subject site in Schedule 'A' – St. Thomas Land Use Designation from 'Highway Commercial' to 'Minor Commercial' with a site-specific policy that permits a food store with no more than 1,826 m^2 and a maximum total gross leasable floor space available for all commercial or office uses in any area designated "Minor Commercial" not exceeding 3,330.4 m^2. Section 5.7.1 speaks to the background of this Land Use Designation as areas that serve day-to-day retail and service needs of the surrounding residential areas. It is recognized that minor commercial facilities serve an important retailing function. As outlined in Section 5.7.3.1 permitted uses within this designation include retail and service uses of a convenience or day to day nature. Examples of these types of facilities are a convenience store, hairdresser, barber, bank, bakery, restaurant, office uses and a clinic are permitted. The proposed commercial development would be permitted under the 'Minor Commercial' land use designation with the exception of a maximum total gross leasable floor space regulations. As such, a Special Area Policy under the Minor Commercial Designation for the subject site is requested to recognize the proposed leasable floor space.

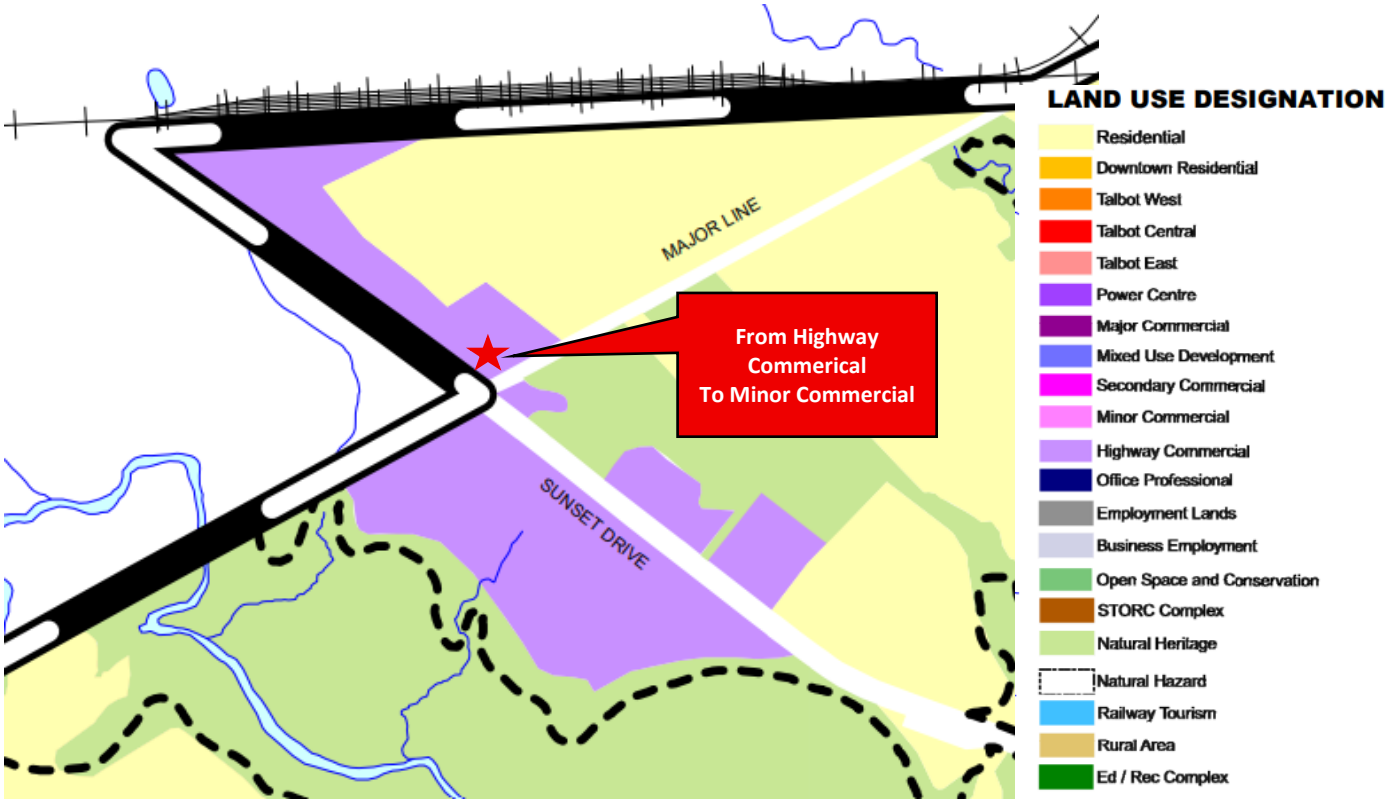


Figure 12: City of St. Thomas Official Plan, Schedule 'A' – Land Use Designation Amendment
Source: St. Thomas Official Plan

5.7.3.7 EXCEPTIONS

5.7.3.X 9784 Sunset Drive (OPA No. XX)

5.7.3.7.X.1 The maximum gross leasable floor area of all buildings erected on the lands numbered "xx" and enclosed in heavy solid line on the attached Schedule "A" Land Use Plan shall not exceed 3500 square metres (approximately 37,600 square feet).

5.7.3.7.X.2 Notwithstanding Subsection 5.7.3.1, the maximum gross leasable floor area for a food store shall not exceed 1850 square metres (approximately 13,000 square feet).

7.3. St Thomas Urban Design Guidelines

The St. Thomas City-Wide Urban Design Guidelines establish a framework for creating functional, attractive, accessible, and sustainable development. The Guidelines apply to a broad range of development types across the municipality and provide direction respecting site organization, building orientation and massing, pedestrian circulation, parking and loading, accessibility, landscaping, lighting, signage, and the relationship between private development and the public realm. The proposed development has been assessed against the applicable design principles, priorities, general private-realm guidelines, and commercial design guidelines, as summarized below.

UDG Policy	Response
1.3 Design Principles 1.3. 2. Human Scale within Urban Fabric: Create built environments (i.e., building massing, scale, details) that support comfortable, desirable, and active lifestyle and pedestrian experience, while complementing the character of the existing urban fabric. 1.3. 5 Sustainable Development: Promote sustainability at all levels of city-building through urban design: green infrastructure; green building practices; climate change resiliency; active transportation, renewable and low-carbon energy and design initiatives; native plants; and material selections. 1.3.8. Accessibility/Universal Design: Provide designed spaces that reinforce inclusivity and allow users of all abilities to access, navigate, interact, and explore without physical and perceived barriers.	The proposed development responds to the Guidelines' human-scale, sustainability, and universal design principles. The one-storey buildings maintain a pedestrian-scaled built form, while articulated façades, glazing, and varied architectural treatments reduce the perceived mass of the buildings and create visual interest along Sunset Drive, Major Line, and the internal parking area. The site's proximity to planned residential development, together with walkways connecting parking areas and building entrances, supports active transportation and convenient access to neighbourhood-serving commercial uses. Accessible parking spaces, curb ramps, and barrier-free building entrances will be integrated into the detailed design to provide inclusive and practical access for users of varying abilities.
1.4 Design Priorities Priority 1: Create a universally accessible and inclusive urban environment that supports residents and visitors of all abilities. Priority 4: Create a walkable and pedestrian-friendly city that supports modes of active transportation, and a well-connected street network that is safe, comfortable, and accessible.	The proposed one-storey commercial development will incorporate accessible parking spaces, curb ramps, and accessible entrances as part of the detailed site and building design. A coordinated network of pedestrian walkways will connect the parking areas to the principal building entrances and support safe movement throughout the site. The subject site is also located near planned residential development, allowing future residents to access retail, restaurant, personal service, office, and grocery uses within a short walking or driving distance. Together, these features support a more inclusive, connected, and pedestrian-friendly commercial environment.
4.0 Private Design Guidelines 4.2 General Guidelines 4.2.1 Site Organization and Sustainable Design 2. All developments should be designed to support walking, cycling and public transit as preferred modes of transportation, as well as create visual interest, and heighten interaction between internal spaces and the public realm. 6. All buildings should be oriented to maximize solar access and natural ventilation while minimizing shadow impacts on adjacent properties and public spaces. 14. Parking and loading areas should generally be in the rear yard, and where side yard parking is proposed, it should be well screened from the public realm through attractive landscaping. Front yard parking is discouraged. 17. Property access should be consolidated through shared driveways, wherever possible, to reduce the	Site organization The site has been organized as a coordinated commercial development with two multi-unit commercial buildings and two standalone quick-service restaurants connected by a shared internal drive-aisle and pedestrian network. Building 1 is located close to Sunset Drive, while the other buildings address Major Line or the internal parking area through articulated façades and glazing. The large shared parking area is located primarily within the interior of the site, where the surrounding buildings reduce its visibility from the public streets. Loading and servicing areas are separated from primary pedestrian routes where practical and will be further screened through landscaping and detailed site design. Three site accesses—one from Sunset Drive and two from Major Line—distribute traffic through the connected internal network while limiting unnecessary curb cuts. Building orientation and the proposed one-storey height also minimize shadow impacts and permit solar exposure and natural ventilation. The development makes use of deep well garbage system.

UDG Policy	Response
number of curb cuts and interruptions to the pedestrian realm. 18. Buildings should generally align along the street edge, strengthening the urban built streetscape. 19. Development on corner lots should front both edges with articulated facades and windows that provide views of the street and/or open space from living areas; blank walls visible from streets parks, or other public spaces are not permitted. 21. Deep well garbage systems are preferred over detached garbage enclosures. 4.2.2 Building and Massing 10. Corner buildings should address both street frontages. 4.2.2.2 Exterior Walls 3. Large blank walls should be avoided, especially when facing public streets or open spaces. Architectural elements, such as windows, doors, or decorative treatments, should be incorporated to break up the facade and create visual interest. 4.2.2.3 Windows, Entrances and Doors 2. Storefront windows should follow the line of the front face of the building and maximize the amount of glazing at street level. 3. Front entrances should be prominent, well detailed and emphasized through windows, canopies, lighting and other features. 4. Building entrances should be clearly visible, accessible, and well-lit, providing a direct connection to the public realm. 5. Accessible entrances and ramps should be seamlessly integrated into the building design, ensuring ease of use for individuals with varying mobility levels. 4.2.5 Safety, Security, and Comfort 2. Adequate lighting illumination and continuous lighting should be integrated in the site design. 4. Barrier free access should be provided for emergency vehicles.	Façade and entrance design All buildings adjacent to Sunset Drive and Major Line provide glazed and articulated street-facing façades, even where direct access is not provided from those streets. Windows, changes in façade plane, and variations in building line break up the building mass and create visual interest. Glazing has been maximized on the elevations facing the public streets and the internal parking area, where compatible with the functional requirements of each commercial unit. Architectural detailing, signage, and lighting are integrated into the building design to emphasize and clearly identify the principal entrances.

UDG Policy	Response
4.2.6 Lighting and Signage 2. Site and building LED lighting should be integrated into the design, reducing, and minimizing light pollution and glare with full cut-off lighting. 3. Light pedestrian areas (entrances, walkways, amenity areas, service areas etc.) should be adequately lit, including pedestrian scale lighting along high traffic routes. 4. Signage and lighting should be architecturally integrated into the building facades. 5. Durable and high-quality signage and building address should be architecturally integrated into the building facades and along primary frontages.	
4.3 Site Specific Design Guidelines **4.3.6 Commercial** **4.3.6.1 Site Design** 2. Developments should incorporate a variety of retail unit sizes and building formats. 3. Buildings should front onto public streets or internal streets created on the site. 4.3.6.2 Massing and Architectural Design 1. Where buildings face both a public street and an internal parking area, the preference is that primary entrances should be provided on both frontages. At a minimum both facades are required to be predominantly glazed with visual connections between the interior of the retail unit and the street. Where fronting onto both sides is not possible, allow for one row of parking between the building and the public road, and provide frontage there. 2. Excessive signage and illumination are discouraged. 4. Maximum building length of commercial buildings should not exceed 75 metres where buildings are located within 15 metres of the front or exterior side lot lines, to encourage pedestrian scale buildings and to reduce shadowing impacts. 8. Vertical divisions of the façade should be included to provide visual interest and definition if multiple units are in a single building. 9. Entrances, primary street frontage/façade and other highly visible areas should be a higher quality material and architectural style. 11. Building flankage is to be treated similarly to the building frontage.	The proposal incorporates a range of commercial unit sizes and building formats, including an eight-unit commercial building, a two-unit commercial building containing the anchor food store, and two standalone quick-service restaurants. This mix accommodates neighbourhood-serving retail, personal service, office, food store, and restaurant uses within a coordinated development. The buildings front either a public street or the shared internal parking and drive-aisle system, and street-facing elevations include glazing and architectural treatment to maintain visual connections with Sunset Drive and Major Line. Signage is intended to hang over the entrances in a sufficing way to indicate the retail but not overwhelming. The longest building of the development has 65 m length and it still provides a brokken up façade with glazing along the streetline.

7.4. CITY OF ST. THOMAS ZONING BY-LAW 50-88

The subject site is currently zoned Highway Commercial (C7-16) as per the City of S. Thomas Zoning By-law 50-88. Permitted uses within this zone include animal clinic, automotive service business, automotive trade, car wash, care rental business, existing business office and existing retail commercial uses, gas bar, self-storage business and other similar uses. This zone is intended to accommodate a range of highway-oriented commercial uses on high visibility and convenient access from major transportation routes. The special provision permits a single detached dwelling on the subject site. These uses typically include larger format automotive related establishments that serve both local residents and the travelling public. In reviewing the existing zone, the proposed uses as part of this commercial development, such as commercial retail, personal service and office is not in line with the intent of the Highway Commercial (C7) Zone; and as such, the applicant is requesting the subject site be rezoned to a Secondary Commercial (C5(*)) Zone with site specific provisions to permit the proposed development. The C5 Secondary Commercial Zone is intended to accommodate a range of small- to medium-scale retail and service commercial uses that serve the daily needs of surrounding neighbourhoods. The zone supports conveniently located, accessible commercial development that is compatible with residential uses. The table below provides a comparative analysis of the regulations of the Site-Specific Secondary Commercial (C5(*)) Zone and the proposed development.

Regulations – C5 Zone, Secondary	Required	Proposed	Complies (Y/N)
Permitted Uses	Retail store, Office, Personal Service, Drive-In Restaurant	**Food Store**	**N**
Minimum Lot Area (m^2)	No Min.	13,291.8 m^2	Y
Minimum Lot Frontage (m)	No Min.	121.11	Y
Minimum Front Yard (m)	Nil.	3.04	Y
Minimum Side Yard Depth - Abutting Non-Residential (m)	Nil.	11.6	Y
Minimum Side Yard Depth – Abutting Residential (m)	3.0	7.6	Y
Minimum Rear Yard Depth- Abutting Residential (m)	3.0	8.7	Y
Maximum Lot Coverage (%)	-	25	Y
Minimum Landscape Area (%)	-	19.8	Y
Maximum Height (m)	-	TBD	Y
Minimum Parking	General Commercial (4.5 spaces per 100 m^2) Restaurant (20 spaces per 100 m^2) Food Store (6 spaces per 100 m^2) Total: 237	166	**N**

Figure 13. Zoning Table Analysis for Proposed Development

7.3 Proposed Amendment to The City of St. Thomas Zoning By-law 50-88

The purpose of this application is to amend the Zoning By-law from Highway Commercial (C7-16) to a Site-Specific Secondary Commercial (C5- (*)) Zone. **Figure 8** displays the requested Zoning By-law Amendment on the subject site, 9784 Sunset Drive, St. in St. Thomas.

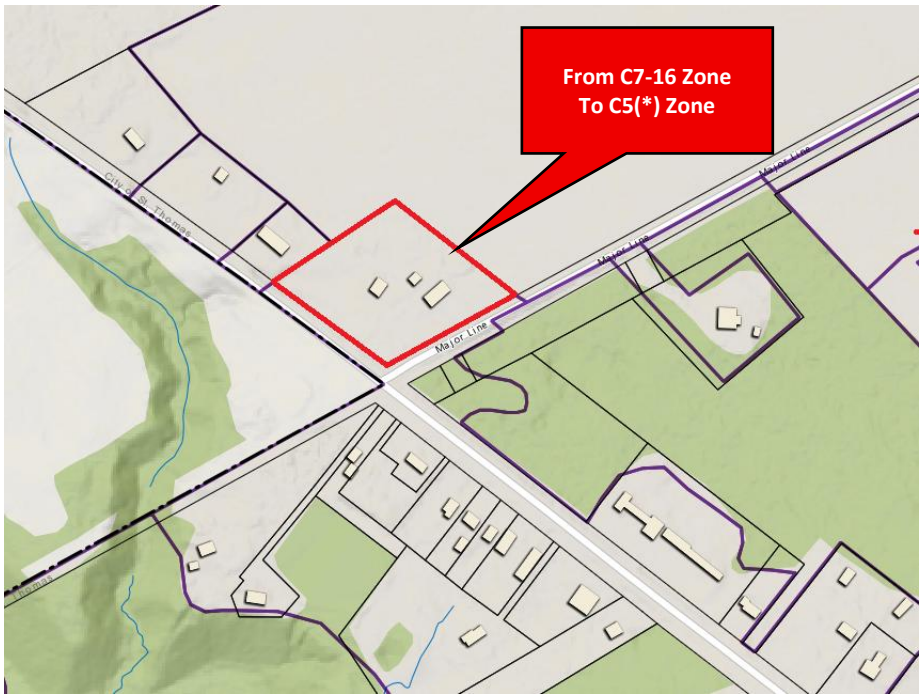


Figure 14. Proposed Zoning By-law Amendment
Source: City of St. Thomas Mapping

As outlined in Figure 8, the following Site-Specific Provisions are requested:

16.5 XX Special Zone

a) Area Affected
C5-X (9784 Sunset Drive) as shown on Zoning Map XX-X

b) Additional Permitted Use
Food Store

c) Maximum Floor Area
The maximum floor area for retail shall not exceed 750 m^2
The floor area of the food store shall not exceed 1850 m^2

d) Required Minimum Number of Parking Spaces
1 parking space for each 25 square metres of floor area of any permitted use within this zone.

7.3.1 Rationale for Site Specific Provisions

Additional Permitted Use, Food Store not exceeding a floor area of 1,850 m^2

The proposed special provision to permit a food store with a maximum gross floor area of 1,850 m^2 represents an appropriate use and scale necessary to support the long-term viability of a neighbourhood. The food store reinforces the intended function of the Minor Commercial designation by providing a key neighbourhood use that supports the daily needs of the local community. A food store is an important foundation of a complete community, offering convenient access to groceries and essential goods while reducing auto dependence and distant travels. Additionally, the use is consistent with the intent of the Minor Commercial designation by directing appropriately scaled commercial uses to location that are accessible and compatible with surrounding land uses while still ensure the majority of commercial floor space is concentrated in the “Downtown”, “Elgin Mall” and “Power Centre Commercial Area”.

The requested increase in the maximum floor area for an individual retail use from 300 m^2 to 750 m^2 is intended to provide appropriate leasing and operational flexibility within Building 1 while maintaining its planned scale and neighbourhood-serving function. The building has been designed to accommodate a food store of up to 1,850 m2; however, market conditions may not always support securing a single food store tenant requiring the full area. The proposed provisions would therefore permit an alternative configuration consisting of a food store anchor of approximately 1,150 m2 and an additional retail unit of up to 750 m2, such as a pharmacy or another modest neighbourhood-serving anchor. This flexibility would improve the likelihood of timely occupancy and support the long-term viability of the development without increasing the approved building envelope or the maximum total gross leasable floor area. The alternative tenant arrangement can be accommodated by the proposed parking, loading, access, servicing, and site-design framework and would continue to provide convenient day-to-day goods and services for existing and planned nearby residents, consistent with the intended function of the Minor Commercial designation.

Required Minimum Number of Parking Spaces

The existing parking regulations require 4.5 spaces per 100 m^2 of gross floor area for general commercial use, 20 spaces per 100 m^2 of gross floor area for restaurant use and 6 spaces per 100 m^2 of gross floor area for food store use. In this case, the site plan provides 166 parking spaces in total for all the combined uses, and 17 stacked parking spaces for the restaurant. The applicant is requesting to amend the parking requirement to 1 parking space for each 25 square metres of floor area for any permitted use within this zone. The current parking requirement applies to uniform rates to a mix of commercial uses without accounting for shared parking opportunities or variations in peek demand. The proposed development consists of a coordinated mix of uses, including general commercial, quick service restaurant and food store, which exhibit different peak parking periods, this allows for a more efficient utilization of the overall parking supply, reducing the need for an inflated parking standard. Further, the site is designed as a comprehensive commercial development with shared access, internal drive aisles, and a unified surface parking lot, which supports a shared parking approach. Industry best practices and contemporary planning policy increasingly recognize that shared parking can significantly reduce the total number of spaces required without resulting in parking deficiencies.

The proposed parking provision helps advance City of St. Thomas land use goas such as efficient use of land by minimizing excessive surface parking areas and supporting compact and sustainable development patterns. Additionally, 1 parking space for each 25 square metres of floor area remains functional for a Minor Commercial designation context which intended to accommodate localized service hubs and not as a auto-centric destination note. The proposed parking rate better aligns with the neighbourhood-serving nature of the Minor Commercial area. Based on the foregoing, the special provision is considered appropriate.

8. CONCLUSION

In conclusion, it is the opinion of the writer that the requested Official Plan Amendment and Zoning By-law Amendment is appropriate for the subject site and represents good planning for the following reasons:

- The development proposal and associated Official Plan and Zoning Bylaw Amendments are consistent with the policies of the Provincial Planning Statement, 2024, which promote complete communities and the efficient use of land within designated settlement areas.
- The development proposal and associated Official Plan and Zoning Bylaw Amendments align with the general intent and policy framework of the City of St. Thomas Official Plan by providing a compatible and appropriately scaled use that reflects existing and future community needs
- The proposed development would efficiently utilize existing serviced land and existing and planned municipal infrastructure.
- The proposed development has been designed with consideration of abutting land uses and will not create adverse impacts on the surrounding area.

For the reasons noted above and throughout this report, it is our professional land use planning opinion that the development proposal is appropriate and desirable. As such, recommend that the proposed Official Plan Amendment and Zoning By-Law Amendment Applications be approved.

Respectfully submitted,

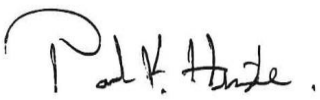
Strik, Baldinelli, Moniz Ltd.

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