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2026-07-16
Project: (250849)

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RE: MINOR BUILDING ADDITION, 300 ELM STREET, ST. THOMAS TRANSPORTATION IMPACT BRIEF UPDATE

Paradigm Transportation Solutions Limited (Paradigm) prepared a Transportation Impact Brief[1] (TIB) in March 2026 for a minor office building addition to the existing Domino's Pizza outlet on the property located at 300 Elm Street, St. Thomas. Subsequently, Paradigm prepared a TIB Update Letter in May 2026[2] to assess an alternative scenario wherein the building addition is developed as a 123.6 sq. m. (1,330 sq. ft.) medical clinic and a 150.0 sq. m. (1,615 sq. ft.) dispensing pharmacy.

Since the submission of the TIB and the subsequent update, the City has requested the following:

> *The Traffic Impact Brief (TIB) needs to provide a statement confirming that, in their professional opinion, the proposed 27 off-street parking spaces are adequate to accommodate the existing restaurant building floor area of 213.9 sqm and proposed business office, clinic and pharmacy building floor area of 273.6 sqm.*

This TIB Update includes a review of the proposed parking supply under two scenarios: one where the building addition includes only office use, and one where the building addition comprises a medical clinic and dispensing pharmacy.

[1] Prepared by Paradigm Transportation Solutions Limited, "Minor Office Addition, 300 Elm Street, St. Thomas Transportation Impact Brief", 30 March 2026.
[2] Prepared by Paradigm Transportation Solutions Limited, "Minor Office Addition, 300 Elm Street, St. Thomas Transportation Impact Brief Update", 06 May 2026.

Parking Requirements

As noted, the proposed building addition will include a GFA of 273.6 sq. m. (2,945 sq. ft.) and comprise either entirely office or will be split between a clinic and a pharmacy. Both scenarios include retaining the existing 213.9 sq. m. (2,302 sq. ft.) Domino's Pizza building.

At present there are 33 onsite parking spaces, and the proposed redevelopment will result in the removal of six spaces leaving a total of 27 onsite parking spaces.

The assessment of the proposed onsite supply of 27 parking spaces is guided by the City of St. Thomas Zoning By-Law 50-88[3], and corresponding parking rates provided by the Institute of Transportation Engineer (ITE) Parking Generation Manual (6th Edition)[4].

The existing Domino's Pizza operates as a takeout facility and does not provide a sit-down service. The ZBL parking requirement of 20 spaces per 100 sq. m. for a restaurant use is not appropriate for the subject pizza outlet. The ZBL requirement of 3 spaces for 100 sq. m. for retail-commercial uses is more appropriate for the subject outlet, which amounts to seven onsite parking spaces.

For the new building addition, the ZBL requirement will be 16 spaces if used as an office and 17 spaces if used as a medical clinic and pharmacy.

Table 1 summarizes the ZBL rates and the corresponding requirements.

The following considerations are appropriate in assessing the parking requirements shown in **Table 1**:

- While the existing Domino's is classified as a restaurant use, the standard restaurant parking rate is not considered appropriate because no customer seating is provided; therefore, the general retail-commercial rate of 3.0 spaces per 100 sq. m. is applied.
- Similarly, the ZBL does not have a specific rate for a pharmacy use and as such, the Retail Store rate of 4.5 spaces per 100 sq. m. is applied.
- The medical clinic follows a rate of 1.0 space per 50 sq. m. GFA, consistent with the Special Zone provision in the City's ZBL[5].
- The pharmacy could also be assessed using the same rate applied to the clinic; however, the Retail Store rate provides a more conservative assessment.

[3] City of St. Thomas Zoning By-Law 50-88, Section 4.3.3: Parking Requirements in Commercial Zones, 1988.
[4] Institute of Transportation Engineers, *Parking Generation*, 6th Ed., Washington DC: ITE, October 2023.
[5] Ibid, Section 17.5.22.

TABLE 1: ZBL REQUIRED AND PROPOSED RATES

Land Use	GFA (sq. m.)	ZBL Requirement		Provided
Clinic and Pharmacy				
Domino's (Other Commercial Uses)	213.9	3.0 spaces per 100 sq. m.	7	27
Medical Clinic	123.6	1.0 space per 50 sq.m.	3	
Pharmacy (Retail Store)	150.0	4.5 spaces per 100 sq.m.	7	
Total			**17**	**27**
Office				
Domino's (Other Commercial Uses)	213.9	3.0 spaces per 100 sq. m.	7	27
Business Office	273.6	3.0 spaces per 100 sq. m.	9	
Total			**16**	**27**

As can be seen in the **Table 1**, the proposed supply of 27 parking spaces is adequate to meet the parking requirements of the new building either as a business office or a medical clinic/pharmacy, along with the existing Domino's Pizza outlet.

ITE Parking Rates

The ITE Parking Generation Manual provides data on surveys across the USA and Canada of peak parking demand of different land uses.

The parking demand for the subject site has been estimated using the average rates of the following land use codes:

- LUC 630, Walk-In Clinic (includes Medical Clinic and Pharmacy);
- LUC 712, Small Office Building; and
- LUC 933, Fast-Food Restaurant without Drive-Thru Window.

It is noted that ITE's description of the use indicates that the data include sites that have both a medical clinic and a pharmacy.

Table 2 summarizes the estimated number of required parking spaces based on the ITE rates. As shown in the table, the existing Domino's and the proposed new building will require a total of 28 parking spaces if the new building is used as a medical clinic and pharmacy, and 22 spaces if it is used as an office building.

TABLE 2: ITE PARKING DEMAND

Land Use Code	GFA (sq. ft.)	Average Parking Rate	Total
Clinic and Pharmacy			
630: Walk-In Clinic	2,945	3.67	**11**
933: Fast-Food Restaurant without Drive-Thru Window	2,302	7.54	**17**
Total			**28**
Office			
712: Small Office Building	2,945	1.85	**5**
933: Fast-Food Restaurant without Drive-Thru Window	2,302	7.54	**17**
Total			**22**

Based on parking demand estimates shown in **Table 2**, the proposed supply of 27 parking spaces is adequate for the proposed redevelopment of the site.

Additionally, the above ITE assessment assumes concurrent peak parking demand for all site uses. In practice some level of shared parking is anticipated between the existing Domino's Pizza use and the proposed medical clinic and pharmacy uses, as peak customer activity may occur at different times of day. Accordingly, the combined parking demand is expected to be somewhat lower than the combined average peak demands summarized in **Table 2**.

Summary

In summary and based on the above review using the applicable ZBL and ITE parking rates and requirements, it is reasonable to consider the proposed parking supply of 27 onsite parking spaces as adequate to accommodate the existing Domino's building and the proposed building addition under either scenario.

Yours very truly,

PARADIGM TRANSPORTATION SOLUTIONS LIMITED



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