



Planning Justification Report

410 Sunset Drive
St. Thomas, ON

Quincy Developments

March, 2026



Zelinka Priamo Ltd.

LAND USE PLANNERS

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1.0 INTRODUCTION AND SUMMARY

Zelinka Priamo Ltd., on behalf of Quincy Developments, is pleased to submit this Planning Justification Report in support of an application to the Municipality of Central Elgin to amend the Township of Yarmouth Zoning By-law No. 1998 for the lands known municipality as 410 Sunset Drive (hereinafter referred to as the 'subject lands'). The intent of the proposed Zoning By-law Amendment ('ZBA') is to modify the existing site-specific "Residential (R1-88) Zone" to permit the use of 'back-to-back' townhouses as an additional permitted use.

A Record of Pre-Consultation was provided by the Municipality of Central Elgin dated Thursday, August 14, 2025, to confirm the scope of the application and the supporting materials for a complete Zoning By-law Amendment application. A preliminary site plan has been prepared in support of the application which depicts the location of the buildings, vehicular access, parking spaces, areas of future development, and general site characteristics. Further technical details will be refined during the Site Plan Approval process.

This report evaluates the proposed Zoning By-law Amendment within the context of existing land use policies and regulations, including:

- The Provincial Planning Statement 2024 (PPS);
- County of Elgin Official Plan 2025;
- Municipality of Central Elgin Official Plan 2022; and,
- Township of Yarmouth Zoning By-Law No.1998.

This report concludes that the proposed Zoning By-Law Amendment is appropriate and desirable for the following reasons:

- The proposed Zoning By-Law Amendment is consistent with the policies of the 2024 Provincial Planning Statement, the policies of the 2025 County of Elgin Official Plan, and the 2022 Municipality of Central Elgin Official Plan;
- The proposed Zoning By-Law Amendment maintains the purpose and intent of the Township of Yarmouth Zoning By-Law No.1998 as the proposed housing type is generally consistent with the existing permitted housing types;
- The proposed Zoning By-Law Amendment will permit a more compact style of the existing 'townhouses' use to contribute to increasing the range, mix, and attainability of housing supply in the community; and,
- The proposed use is considered appropriate for and compatible with the context of the surrounding area.

2.0 SUBJECT LANDS

The subject lands consist of a single, rectangularly shaped parcel of land, known legally as CON 6 PT LOT 3 RP 11R4446, PARTS 1 TO 4 and known municipally as 410 Sunset Drive. The subject lands are located on the northeast corner of the intersection of Sunset Drive and Karen Street, located opposite to the Southwest Center for Forensic Mental Health Care and former St. Thomas Psychiatric Hospital lands, east of Sunset Drive (Figure 1).

The approximately 1.86ha (4.6ac) subject lands have a lot frontage of approximately 110m along Karen Street and 170m along Sunset Drive.

Figure 1 – Location – Subject Lands outlined in yellow



The subject lands are occupied by a two-storey 'X'-shaped institutional building located in the northerly portion of the property with an associated parking area. This building is presently used for a private school (King's Academy). The remaining areas of the subject lands are vacant. Vehicular access to the existing building is provided from Karen Street by a paved driveway. The subject lands are serviced by existing municipal water and septic infrastructure.

A fenced-in municipal pumping station is located along the southeast corner of the subject lands, with an area of approximately 254.5m². This municipal pumping station area is excluded from the calculations relating to the proposed development.

Karen Street and Sunset Drive are identified respectively as a “Local Road” and a “County Road” as per Schedule ‘E1’ of the Municipality of Central Elgin Official Plan. A paved bike lane abuts the subject lands to the east along Sunset Drive, familiarly known as the “Whistlestop Trail”. This active transportation route connects the historic downtown of St. Thomas to the beachfront town of Port Stanley.

The subject lands are within the “Urban Settlement Area” land use designation as per Schedule ‘1’ – Land Use Structure of the Official Plan of Central Elgin. As a result of an Ontario Land Tribunal (‘OLT’) decision in 2024, the lands are within the “Residential” land use designation. A subsequent Zoning By-law Amendment application to the 2024 OPA identifies the lands as being within the site-specific “Residential (R1-88)” zone as per the Township of Yarmouth Zoning By-law No.1998.

Figure 2 – Subject lands (looking north from Karen Street)



Figure 3 – View of the subject lands (looking south)



Figure 4 – Subject lands (looking west from Sunset Drive)



3.0 SURROUNDING LAND USE CONTEXT

The subject lands are generally surrounded by residential and institutional uses. The land uses within a 400m and 800m radii of the subject lands, representing an approximate five-minute and ten-minute walking distance respectively, are shown in Figure 5.

Figure 5 - Site Analysis



The existing land uses within a 400m, five-minute walk radius of the subject lands are as follows:

North: Small scale commercial businesses (5) with low-density residential dwellings (1) to the north, on either side of Sunset Drive.

East: Opposite of Sunset Drive, institutional facilities (4) including the former St. Thomas Psychiatric Hospital and the Southwest Center for Forensic Mental Health Care, commonly recognized as landmarks of the area.

South: Institutional uses (4) in the form of the Elgin County Administration Building and the Provincial Offences Courthouse.

West: Lands west of the abutting railway corridor are of low-density residential use (1).

Figure 6 – Lands to the east – Former St. Thomas Psychiatric Hospital



Figure 7 – Lands northeast – Southwest Centre for Forensic Mental Health



The existing land uses within an 800m, ten-minute walk radius of the subject lands are as follows:

North: Lands north of the subject lands generally consist of low-density residential uses (1) along either side of Sunset Drive with agricultural (3) and natural heritage uses (2) abutting these properties.

East: Institutional lands (4) associated with the former St. Thomas Psychiatric Hospital Lands generally surrounded by agricultural fields (3) and natural heritage features (2).

South: Low-density residential dwellings (1) are located at the intersection of Sunset Drive and John Wise Line. Small scale commercial uses (5) are located just south of the intersection with agricultural fields (3) south of these buildings.

West: Generally, the lands consist of agricultural (3) and natural heritage uses (2) with some residential uses (1) in the form of single-detached dwellings.

The general character of the area surrounding the subject lands consists of low-density residential dwellings with institutional and commercial buildings oriented along Sunset Drive. As identified above, much of the lands to the west consist of low-density residential uses such as one- to two-storey single detached dwellings, which are concentrated within a subdivision or along major arterial roads. Lot sizes within this neighbourhood are generally large and contain older homes with brick/masonry or vinyl siding exterior finishings.

Lands to the south, east, and northeast of the subject lands are of institutional use, consisting of buildings exceeding two-storeys and higher densities within the Southwest Centre for Forensic Health Care building. Notably, the lands of the former St. Thomas Psychiatric Hospital are projected to undergo future residential development.

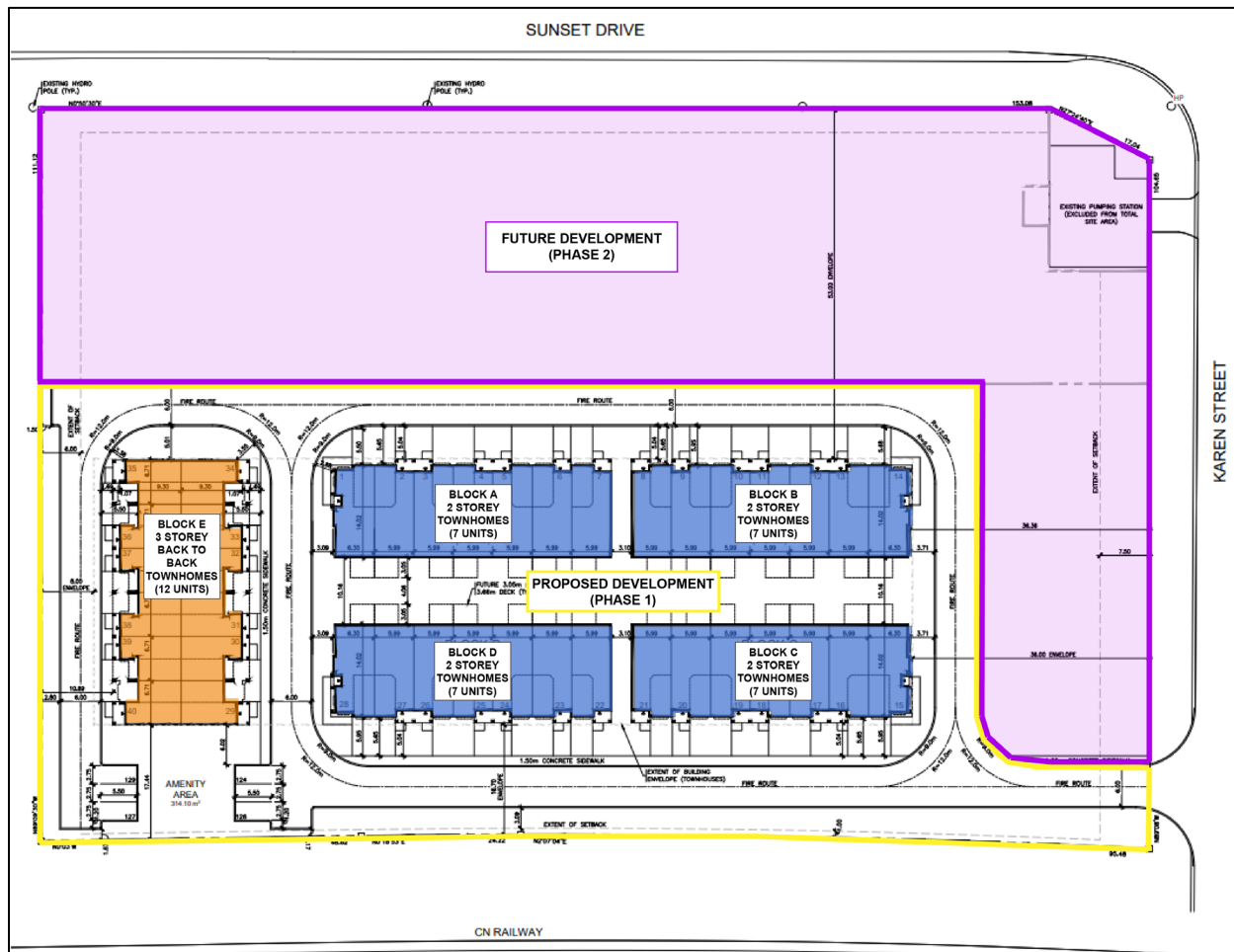
There is currently an absence of a transition from the low-density areas to the north and west to the higher density lands to the north and east. For these reasons, the subject lands can be regarded as an ideal location to facilitate residential intensification and function as a stepping stone from the varying built forms occupying the neighbourhood.

4.0 PROPOSED DEVELOPMENT

The subject lands are proposed to be developed for residential townhouses as shown in Figure 8. The proposed development will be divided into two phases, with the first phase proposing townhouses and the second phase proposing a 6-storey, mixed-use apartment building fronting onto Sunset Drive. It is noted that the proposed apartment building is already a permitted use on the subject lands and is not subject to this Zoning By-law Amendment application.

A total of 40 new housing units, equating to a density of 35 units per hectare, are proposed for Phase 1 of the proposed development. Blocks 'A' - 'D' (4 blocks), each consisting of seven units provide a total of twenty-eight (28) two-storey townhouses (shown in blue). Twelve (12) three-storey 'back-to-back' townhouses are also proposed within the northerly portion of the subject lands within Block 'E' (shown in orange). Similar to above, it is noted that the proposed townhouses are a permitted use; only the 'back-to-back' townhouses are subject to this ZBA application.

Figure 8 - Site Plan (excerpt)



Block 'E' is proposed to consist of 12, three-storey 'back-to-back' townhouses. Figure 9 shows the proposed elevations for the permitted two-storey townhouses. Figure 10 shows the proposed elevations for the proposed three-storey back-to-back townhouses.

Figure 9 – Proposed Two-Storey Townhouses Elevation (excerpt)



Figure 10 – Proposed Three-Storey Back-to-Back Townhouses Elevation (excerpt)



A back-to-back townhouse differs from a standard townhouse in that, in addition to sharing side walls, units also share the back wall with neighbouring units. Individual units will have direct access to grade-level. An example of a back-to-back townhouse in Cambridge, Ontario, is included below for visual purposes (Figure 11). Please note that this image is **for information purposes only** and does not reflect the proposed building design for the subject lands. The below image is provided only to provide a visual example of a back-to-back townhouse built-form.

Figure 11 – Back-to-back townhouse example (for information purposes only)



Vehicular access will be provided from the existing asphalt driveway along the westerly portion of the lands from Karen Street. The existing driveway is proposed to be extended to provide functional circulation around the proposed townhouse units and provide convenient access to each proposed unit as shown in the site plan.

A total of 86 surface parking spaces will be provided for the townhouses at a rate of 1.5 per unit. Each townhouse unit will be provided with a surface parking space located in each driveway (40 total driveway spaces) and a parking space within each garage (40 total garage spaces). Six (6) additional visitor parking spaces are provided in the northwesterly corner of the lands adjacent to the proposed amenity area.

As the lands are located within the Settlement Area Boundary, the lands will be serviced by existing municipal water and septic infrastructure. A municipal pumping station is located within the southeasterly corner of the site that is to remain separate from the proposed development.

The development proposes optimal use of underutilized lands within the settlement area boundary while efficiently utilizing existing municipal servicing infrastructure and providing an appropriate density that contributes to address the lack of housing diversity currently offered in the area. The proposed built form is considerate of the existing height, density, and visual character of the existing neighbourhood character within Norman-Lyndale.

5.0 PROPOSED PLANNING ACT APPLICATIONS

5.1 PROPOSED ZONING BY-LAW AMENDMENT

The proposed 'back-to-back' style of townhouse dwellings are consistent with the intent of the "Residential" land use designation of the Municipality of Central Elgin Official Plan. Although "townhouses" are contemplated as a permitted use within the "Residential (R1-88) Zone", the Township of Yarmouth Zoning By-law No.1998 does not currently recognize the "back-to-back townhouse" style as a permitted use, nor is there a definition for this specific use. The definition of "townhouse dwelling" within the By-law specifies that the units are arranged in a single row, whereas the proposed style consists of two rows sharing rear walls.

As such, a Zoning By-law Amendment is required to permit the specific form of townhouses within Block 'E'. The intent of the proposed ZBA is to modify the existing R1-88 zone to permit the addition of this compact style of housing, being back-to-back townhouses, that offer an opportunity to provide more attainable housing options and increase the range and mix of the housing supply within the Norman-Lyndale community.

This application proposes a definition of "back-to-back townhouse" to be included in the site-specific zone applicable to the subject lands, as follows:

- **TOWNHOUSE DWELLING, BACK-TO-BACK** means a building containing three or more attached dwelling units not in a single row, each of which dwelling units has an independent entrance from the outside and is vertically separated from any abutting dwelling unit.

This proposed definition is based on the existing definition of "townhouse dwelling" and in the Township of Yarmouth Zoning By-law.

It is noted that no other special regulations, such as modified building setbacks, are proposed as part of this application. Further, there is no proposed increase in residential density beyond the 105uph currently permitted in the R1-88 zone.

6.0 LAND USE PLANNING ANALYSIS

The following sections of this report provide analysis on the proposed Zoning By-Law Amendment with respect to the applicable policy and regulatory documents in the Provincial Planning Statement 2024 (PPS), the County of Elgin Official Plan 2025, the Municipality of Central Elgin Official Plan 2023 and the Township of Yarmouth Zoning By-Law No.1998.

6.1 PROVINCIAL PLANNING STATEMENT 2024

The Provincial Planning Statement ('PPS') is issued under Section 3 of the *Planning Act* and "provides policy direction on matters of provincial interest related to land use planning and development." In accordance with the *Planning Act*, all decisions affecting land use planning matters shall be consistent with the policies contained in the PPS. The proposed *Planning Act* applications are consistent with the following PPS policies:

- The proposed development positively contributes to the achievement of complete communities by providing appropriate residential intensification and efficiently utilizing lands that are serviced and within an existing settlement area. The subject lands have convenient access to multimodal transportation networks, amenities and existing servicing infrastructure. The proposed development offers a more compact form of housing that will diversify the range and mix in the housing supply of the Norman-Lyndale neighbourhood (Policies 2.1.6(a), 2.3.1.1);
- The proposed compact style of townhouse is consistent in meeting the social, health, economic, and well-being requirements of current and future residents and contributes to meeting the housing demand of the area that is currently experiencing significant development. The proposed application introduces a new form of housing to the neighbourhood, providing additional housing choices in the area(Policies 2.2.1 (b));
- The proposed townhouse development is located within a settlement area and contributes to the supply and mix of housing options in the neighbourhood that is currently limited to predominantly single detached dwellings. The proposed development efficiently uses land and resources to provide an appropriate density that facilitates a mindful transition from the low-density neighbourhood to a higher density area along a higher order road (Sunset Drive) (Policies 2.3.1.2; 2.3.1.3);
- The subject lands are currently designated and zoned for residential uses, and are located near commercial, institutional, and other residential land uses. A railway corridor abuts the westerly portion of the parcel; however, is not utilized on a regular basis. It is anticipated that there are no adverse noise, odour, health, or safety impacts anticipated on the proposed residential use from the surrounding land uses (Policy 3.5.1);

- Appropriate municipal water and sanitary services are currently available to support the proposed development. The intensification of the subject lands within the settlement area will optimize the use of these existing services (Policy 3.6.2).

Based on the above analysis, the proposed development is consistent with the policies and objectives of the Provincial Planning Statement 2024.

6.2 COUNTY OF ELGIN OFFICIAL PLAN 2025

The subject lands are designated “*Tier 1 Settlement Area*” as per Schedule ‘A’ – County Structure Plan in the County of Elgin Official Plan which contemplates the proposed residential development. Section 2.5 a) provides that these areas are intended to accommodate majority of the growth taking place in the County and offer the highest-level of amenities and employment opportunities. The location of the subject lands is therefore appropriate to accommodate such a development.

Section 2.10 acknowledges that intensification and redevelopment of existing residential areas is a key strategy to managing growth and ensuring the efficient use of land and infrastructure within the County. As such, 16% of all new residential developments will be consistent with these objectives. Although the subject lands have direct access to municipal services and are designated for residential uses, more than half of the lands are currently vacant. The proposed development efficiently utilizes urban lands and municipal infrastructure to intensify and redevelop lands in an ideal location to facilitate the intent and objectives set out in the County Official Plan.

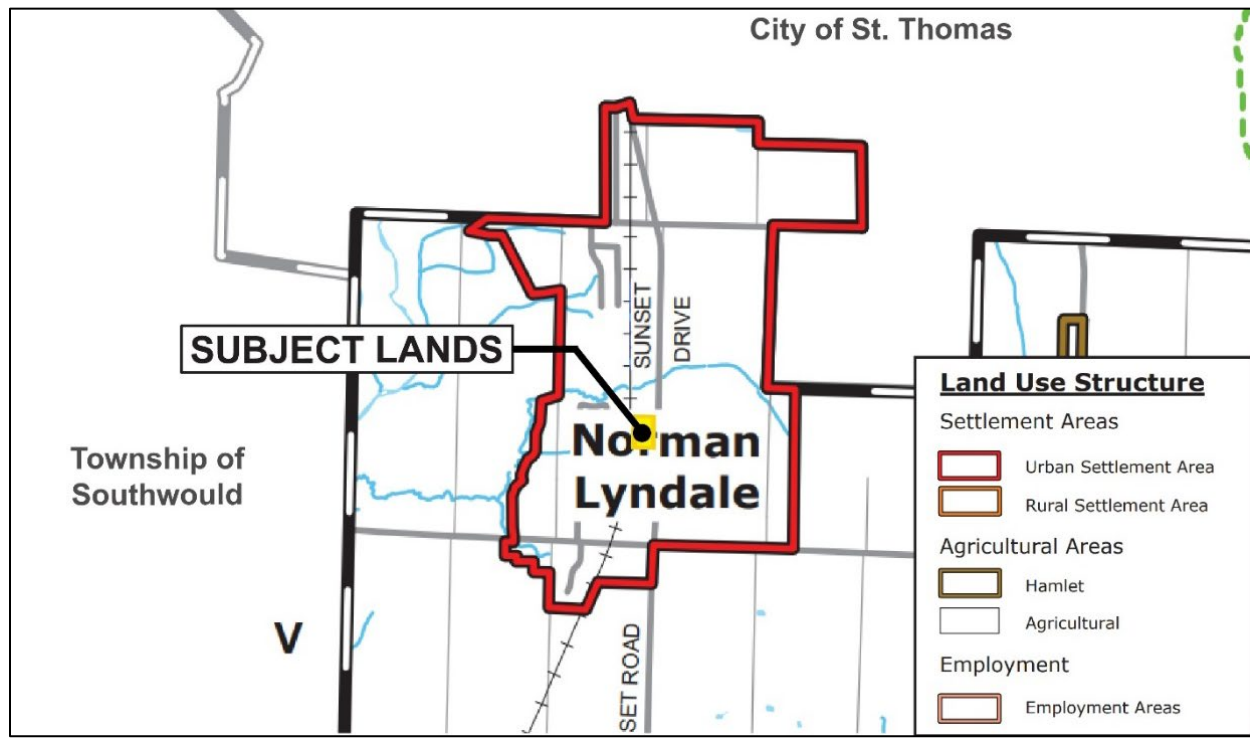
The Official Plan intends to ensure an adequate supply and mix of housing types and tenures to address the current and future needs of households throughout the County. As per Section 4.3, settlement areas that have access to full municipal services are to provide a range of housing typologies. The proposed development contributes 40 new medium-density residential units to a generally low-density area that is nearly exclusive to single detached dwellings. The proposed compact style of townhouse diversifies the housing supply and mix in the Norman-Lyndale neighbourhood and creates residential opportunities that are more attainable to a broader group of individuals.

For the reasons identified above, the proposed development and style of dwellings are consistent with the objectives set out in the County of Elgin Official Plan.

6.3 MUNICIPALITY OF CENTRAL ELGIN OFFICIAL PLAN

The Central Elgin Official Plan identifies the subject lands as within the “*Urban Settlement Area*” of Norman-Lyndale, as per *Schedule ‘1’ – Land Use Structure* (Figure 12).

Figure 12 – Central Elgin Official Plan Schedule “1” – Land Use Structure (excerpt)



As a result of an Official Plan Amendment approved by the Ontario Land Tribunal (Case No. OLT-23-000241) in December 2024, the subject land are designated for “Residential” land use.

This site-specific policy provides that residential uses on these lands consisting of townhouses and a mixed-use apartment building with a maximum building height of 6-storeys are permitted. A minimum commercial floor area of 185.6m² shall be included in the mixed-use apartment building. Phase 1 of the proposed development includes townhouses and ‘back-to-back’ townhouses. The second phase of the development proposes the use of the 6-storey mixed-use apartment building. The following commercial uses permitted within this space generally include:

- Retail;
- Restaurant (without a drive-through);
- Business office;
- Personal services;
- Clinic; and,
- Not-for-profit school

Through discussions with municipal staff, it was interpreted that the policy permissions for “townhouses” in the site-specific Official Plan policy contemplates townhouses in all their forms, including standard townhouses, back-to-back townhouses, stacked townhouses, and back-to-back stacked townhouses.

The following section details how the proposed residential development is consistent with the applicable policies of the Central Elgin Official Plan:

Policy 4.3

- The purpose and intent of the residential designation is to provide efficient, diverse neighbourhoods with a range of housing types and densities. These areas should be supported by various modes of transportation and a range of complementary uses. The proposed development is consistent in facilitating these objectives as the proposed form of housing effectively utilizes land and services and positively contributes to the supply and range of housing provided in the neighbourhood. The lands are connected to the surrounding area by multimodal transportation networks and are surrounded by a range of complementary uses.

Policy 4.3.1 a)

- Townhouses are recognized as permitted uses where land is designated “Residential” and therefore can be regarded as appropriate for the subject lands. The intent of the ZBA is to permit the additional ‘back-to-back’ style of townhouses, which consist of two rows sharing a rear wall, rather than a single row, which is already permitted.

Policy 4.3.1 b)

- The stated goal of the Municipality is to create well-designed neighbourhoods that maintain an attractive, livable, safe, and functional community, and to support the successful integration of various housing types. The proposed development contributes to the supply and mix of housing within the neighbourhood and the immediate area by introducing a new form of medium-density housing units.

Policy 4.3.1 g)

- The proposed development is adjacent to non-residential uses. It has been identified through additional studies that no undue adverse impacts are anticipated as a result of the development, and as such, the proposed use is compatible with the existing uses abutting the parcel.

Policy 4.3.2 a)

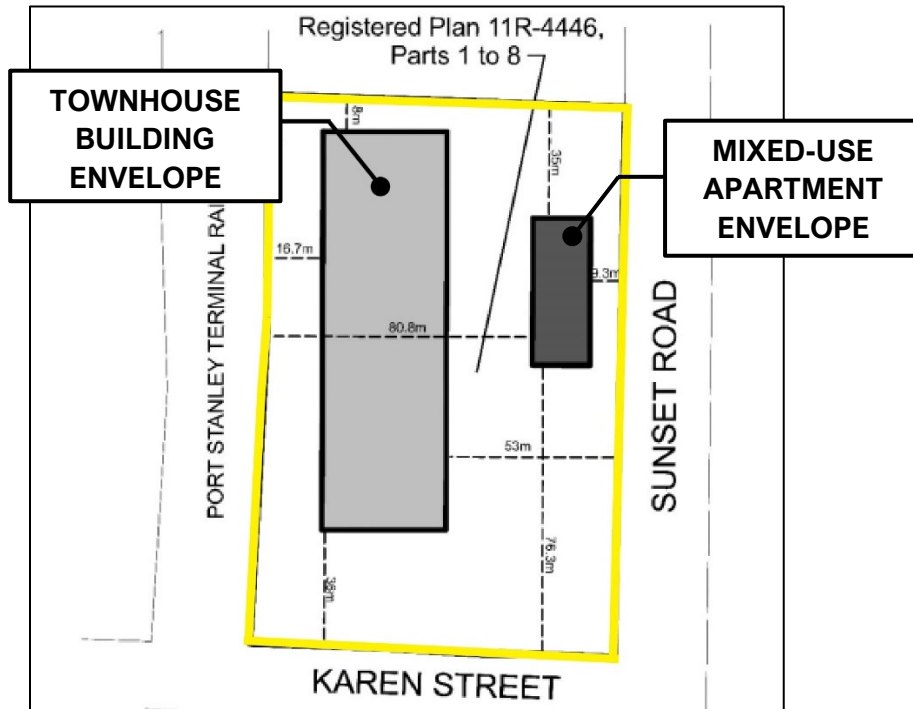
- The proposed development has regard for the massing, scale, design and physical character of the existing neighbourhood as the layout of the proposed buildings establishes a gradual transition in density to ensure compatibility. The proposed townhouses function as a transition from the low-density residential neighbourhood to the west to the future apartment building along Sunset Drive.

Based on the above analysis, the proposed development is appropriate for the community and in conformity with the policies of the Central Elgin Official Plan.

6.4 TOWNSHIP OF YARMOUTH ZONING BY-LAW NO.1998

The subject lands are within a site-specific “Residential (R1-88)” zone in the Township of Yarmouth Zoning By-Law No.1998 as a result of an OLT decision in December 2024 shown in Schedule 75 (Figure 13).

Figure 13 – Site Specific Zoning – Schedule 75 Township of Yarmouth Zoning By-Law excerpt



Permitted uses within the R1-88 Zone include the following:

Residential Uses:

- Mixed-Use Apartment;
- Townhouse; and,
- Accessory uses to the foregoing.

Commercial Uses in Relation to a permitted Mixed-Use Apartment:

- Business Office;
- Clinic;
- Personal Service Shop; and,
- Retail;
- Restaurant;
- Accessory uses to the foregoing

Commercial Uses in Relation to Existing Buildings and Structures as of the date of passing of the By-law:

- Business Office;
- Clinic; and,
- Accessory uses to the foregoing.

Institutional Uses in Relation to Existing Buildings and Structures as of the date of passing of the By-law:

- A not-for-profit school.

Section 9.2.2.88 provides the site-specific zoning regulations that define the permitted building envelopes of future development shown in Table 1 - Proposed Zoning Regulations (following page). Although the use of townhouses is permitted within the Township of Yarmouth Zoning By-law, Section 2.168 defines townhouses as a single row of three or more attached units that are vertically separated from any abutting dwelling unit. As the dwellings proposed within Block 'E' consist of two rows of units in a 'back-to-back' configuration sharing rear walls, an additional use specific to the proposed style of townhouses is required to conform to the applicable Zoning By-law.

Table 1: Site Statistics

Zoning Regulations	Required (R1-88) Zone	Shown on Plan
Lot Area (min.)	1,000.0 m ²	11,621.37 m ² (1.16ha)
Lot Frontage (min.)	30.0 m	70.43 m
Lot Depth (min.)	150.0 m	168.29 m
Lot Coverage (max.)	40.0 %	25.15%
Height (max.)	Townhouse: 13.0 m	Townhouse: 10.40 m
Front Yard Setback (min.)	7.5 m	36.36 m
Interior Side Yard (min.)	1.0 m	17.44 m
Exterior Side Yard (min.)	3.5 m	53.00 m
Rear Yard Setback (min)	6.0 m	10.89 m
Density (max.)	105.0 units/ha	34.42 units/ha
Landscape Open Space (min.)	40%	41.90%
Parking Requirements		
Parking Spaces – Residential – Townhouse (min.)	1.5 spaces per unit = 60 spaces	80 Spaces (40 on Driveway, 40 in garage)
Parking Spaces – Visitor Townhouse (min.)	0 spaces per unit = 0 spaces	6 spaces (all surface parking)

As noted earlier in this report, a 'back-to-back' townhouse differs from a conventional townhouse in that, in addition to sharing side walls, the rear wall is also shared with another unit. Each unit will have an individual exterior entrance, consistent with the proposed definition.

The proposed new use, being back-to-back townhouses, and the corresponding definition will implement the site-specific Official Plan policy applicable to the subject lands by facilitating townhouse development. Townhouses are already permitted on the subject lands under the Official Plan; however, the proposed Zoning By-law Amendment is required because the Township of Yarmuth Zoning By-law does not currently include a specific definition for 'back-to-back' townhouses. This amendment therefore seeks only to formally recognize this specific townhouse form within the Zoning By-law.

7.0 CONCLUSION

Given the findings of this Planning Justification Report, it is our opinion that the subject lands are well suited to accommodate the proposed ‘back-to-back’ townhouse development. As previously outlined, a back-to-back townhouse differs from a conventional townhouse in that, in addition to sharing side walls, the rear wall is also shared with another unit; however, each unit will maintain an individual exterior entrance. While townhouses are already permitted under the applicable Official Plan designation for the subject lands, the proposed Zoning By-law Amendment is required as the Township of Yarmouth Zoning By-law No. 1998 does not currently include a specific definition for this form of townhouse development.

The policy analysis within this report demonstrates that the proposed Zoning By-law Amendment to permit the additional use of ‘back-to-back’ townhouses is consistent with the 2024 Provincial Planning Statement, conforms with the 2025 County of Elgin Official Plan and the 2022 Central Elgin Official Plan, and maintains the general intent and purpose of the Township of Yarmouth Zoning By-Law No.1998.

The proposed amendment will facilitate the efficient use of underutilized land, existing municipal services, and transportation infrastructure. The proposed development represents appropriate residential intensification, provides a sensitive transition between lower- and higher-density residential uses, and contributes to an increased supply and range of housing options within the community.

Overall, the proposed development represents a form of housing that differs only slightly from the previously approved development residential development on the subject lands. Accordingly, the proposed Zoning By-law Amendment represents sound land use planning, is consistent with applicable planning policy documents, and is in the public interest.