

January 12, 2023

*via email*

Mr. Kevin McClure, MCIP, RPP  
Planner  
Central Elgin Planning Office  
9 Mondamin Street  
St. Thomas, ON  
N5P 2T9  
kmccclure@stthomas.ca

Dear Mr. McClure,

**RE: Revised Application for Official Plan Amendment  
Quincy Developments  
410 Sunset Drive  
Central Elgin, ON**

**Our File: QUI/CEL/22-01**

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Zelinka Priamo Ltd., on behalf of Quincy Developments, submitted an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) application to the Municipality of Central Elgin on August 12, 2022 to permit the redevelopment of the above-noted lands (the “subject lands”) for two residential apartment buildings consisting of 177 residential units. On September 20, 2022, the Municipality deemed the application complete.

A report to Municipal Council, dated December 12, 2022, details comments from Municipal Staff regarding the proposed application. The report states that while Municipal Staff generally do not have concerns with respect to various technical aspects of the proposed development, there are overall concerns related to the principle of the proposed residential land use. The report goes on to further state that the municipality adopted a new Official Plan in August, 2022 and undertook a residential land needs study, which concluded that there was an oversupply of designated residential land. As such, Staff determined that there would not be adequate justification for the redesignation of the lands for additional residential uses at this time.

As a response to the concerns raised by Municipal Staff, we have prepared a revised Planning Justification Report which details a strategy to redesignate the subject lands in a manner which could facilitate the proposed development without increasing the supply of residentially designated land in the Municipality. Specifically, this can be accomplished by re-designating municipally-owned lands in Port Stanley that are highly unlikely to be developed for residential uses to the “*Natural Heritage*” land use designation, and allocate the same or lesser area of “*Residential*” designation to the subject lands.

Of note, clarified provisions regarding affordable housing are also discussed in the report, specifically that 5 affordable housing units are proposed, to be rented at 85% of average market rent for a period of 25 years.

In addition to the revised Planning Justification Report, the OPA application is to be revised.

Whereas the original OPA application requested only a special policy to the “*Office Professional*” land use designation to permit the proposed development, the application now requests that the subject lands be re-designated from the “*Office Professional*” designation to a site-specific, special policy “*Residential*” land use designation, with the special policy to read as follows:

*In addition to the standard permitted uses, which include high-density apartment dwellings, medical/dental office uses shall be permitted in existing buildings on the lands at 410 Sunset Drive.*

The revised OPA has no effect on the actual proposed development. The only difference in the application is the change in the applicable land use designation from “*Office Professional*” to “*Residential*”.

There are no changes to ZBA portion of the application.

It is our view that the revised OPA is considered a technical revision to the initial OPA/ZBA application and should not be treated as a material change to application that would require a separate notice period and public consultation process. As you are aware, timing is of particular concern with this application, noting that the application was submitted five months ago.

We trust that the enclosed information is satisfactory and we look forward to our continued work and discussions with Municipality of Central Elgin Staff. If you have any questions, or require further information, please do not hesitate to call.

Sincerely,

**ZELINKA PRIAMO LTD.**



Matt Campbell, BA, CPT  
Partner

cc. Jeff Bibbings, Quincy Developments