

Planning Justification Report

200-206 Exmouth Street

Village of Point Edward

Malleum Partners



October 7, 2024

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1.0 INTRODUCTION

Zelinka Priamo Ltd., on behalf of Malleum Partners, is pleased to submit this Planning Justification Report in support of an application to the Village of Point Edward to amend its Official Plan to facilitate the future redevelopment of the lands known municipally as 200-206 Exmouth Street (hereinafter referred to as the “subject lands”) for a high-rise, mixed-use community development consisting of approximately 1,900 residential dwelling units; commercial, retail, and hotel uses; a campus of care; and, a public park.

The purpose of this Planning Justification Report is to evaluate the proposed Official Plan Amendment application within the context of existing land use policies and regulations, including the Provincial Policy Statement, the County of Lambton Official Plan, and the Village of Point Edward Official Plan.

This report concludes that the proposed Official Plan Amendment application to facilitate the proposed development is appropriate and desirable for the following reasons:

- The proposed Official Plan Amendment is generally consistent with the policies of the 2020 Provincial Policy Statement and the County of Lambton Official Plan;
- The proposed Official Plan Amendment generally maintains the intent and purpose of the Village of Point Edward Official Plan;
- The proposed development will allow for the efficient use of underutilized lands within an established settlement area;
- The proposed development will generate a wide range of employment opportunities;
- The proposed development will facilitate the establishment of future housing to help meet the short- and long-term housing needs for current and future residents, and to encourage a more affordable housing market; and,
- The subject lands are sized, configured, and capable of providing for a compact, compatible, and cost-effective form of development that will make efficient use of available infrastructure and municipal services.

2.0 SUBJECT LANDS

The subject lands are located at the southwest corner of Highway 402 and Christina Street North, and are generally bound by Highway 402 to the north, Christina Street North to the east, Exmouth Street to the south, and Front Street North to the west (see Figure 1). The subject lands consist of two parcels, with a total lot area of approximately 6.9ha, and lot frontages of approximately 238.0m along Christina Street North and 255.5m along Exmouth Street. The lands at 200 Exmouth Street are locally known as the former Holmes Foundry site. The lands at 206 Exmouth Street were formerly used as an automobile repair establishment (three-bay shop) with a gas station (Esso).

The lands at 200 Exmouth Street are legally described as PT LT 1 W/S ERROL RD, 2 W/S ERROL RD, 3 W/S ERROL RD PL 2 & 4 POINT EDWARD PT 1 & 2, 25R5331, EXCEPT L929084; S/T L456278, POINT EDWARD, and the lands at 206 Exmouth Street are legally described as PT LT 1 W/S ERROL RD PL 2 & 4 POINT EDWARD AS IN L140874 EXCEPT PT 2, 25R1077; POINT EDWARD, per the Parcel Registers submitted with this application.

General land uses surrounding the subject lands consist of Norm Perry Memorial Park to the east (opposite Christina Street North); commercial and institutional uses to the south (opposite Exmouth Street); Lambton Public Health to the west (opposite Front Street North); and, institutional and commercial uses to the north (opposite Highway 402). The subject lands abut the City of Sarnia municipal boundary to the east and south.

The subject lands have sat vacant and underutilized for many years. The lands are generally flat in topography with a mix of hard- and soft-scape surfaces with some peripheral planting along the easterly and southerly perimeters. See Images 1-4 which illustrate the current conditions of the subject lands.

Pedestrian sidewalks are located on Christina Street North (on the west side of the right-of-way, abutting the subject lands), Exmouth Street (on the south side of the right-of-way), and Front Street North (on the east side of the right-of-way, which abuts the lands adjacent to the subject lands to the west), providing connections to proximate amenities, services, and facilities available within the surrounding commercial/institutional neighbourhood.

Vehicular access to the subject lands is in the form of two all-turns driveways from Exmouth Street, one of which is located beyond the westerly property line, both of which lead to a common informal parking area. The subject lands are serviced by existing public transit (Route #12), providing connections throughout the Village of Point Edward and City of Sarnia.

The subject lands are designated “*Urban Centre*” in the County of Lambton Official Plan; are designated “*Special Tourist Commercial*” in the Village of Point Edward Official Plan; and, are zoned “*Commercial 2 (C2.2(h1))*” in the Village of Point Edward Zoning By-law. The subject lands are not within the St. Clair Region Conservation Authority (SCRCA) regulated area.

Figure 1



Project No.: MLM/PTE/21-01

Date: MARCH 2024

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
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FIGURE 1 - LOCATION
image retrieved from Google Earth

200 EXMOUTH ST OPA
MALLEUM PARTNERS
200-206 EXMOUTH STREET
VILLAGE OF POINT EDWARD
COUNTY OF LAMBTON

Image 1 – Subject lands, looking north from Exmouth Street



Image 2 – Subject lands, looking west from Christina Street North



Image 3 – Subject lands, looking northeast from the Exmouth Street and Front Street North intersection



Image 4 – Subject lands, looking east from adjacent lands



3.0 SURROUNDING LAND USE CONTEXT

3.1 Neighbourhood Context

The subject lands are generally surrounded by commercial, recreational, and institutional uses. The land uses within a 400m and 800m radii of the subject lands, representing an approximate 5-minute and 10-minute walking distance respectively, are shown in Figure 2. See Images 5-9 for pedestrian-level views of the land uses surrounding the subject lands.

The existing land uses within a 400m, 5-minute walk radius of the subject lands are as follows:

North: The subject lands immediately abut Highway 402 to the north. Land uses beyond the Provincial highway consist of low-density residential, warehouse, and medical centre uses. The Hwy 402 East interchange is located northeast of the subject lands.

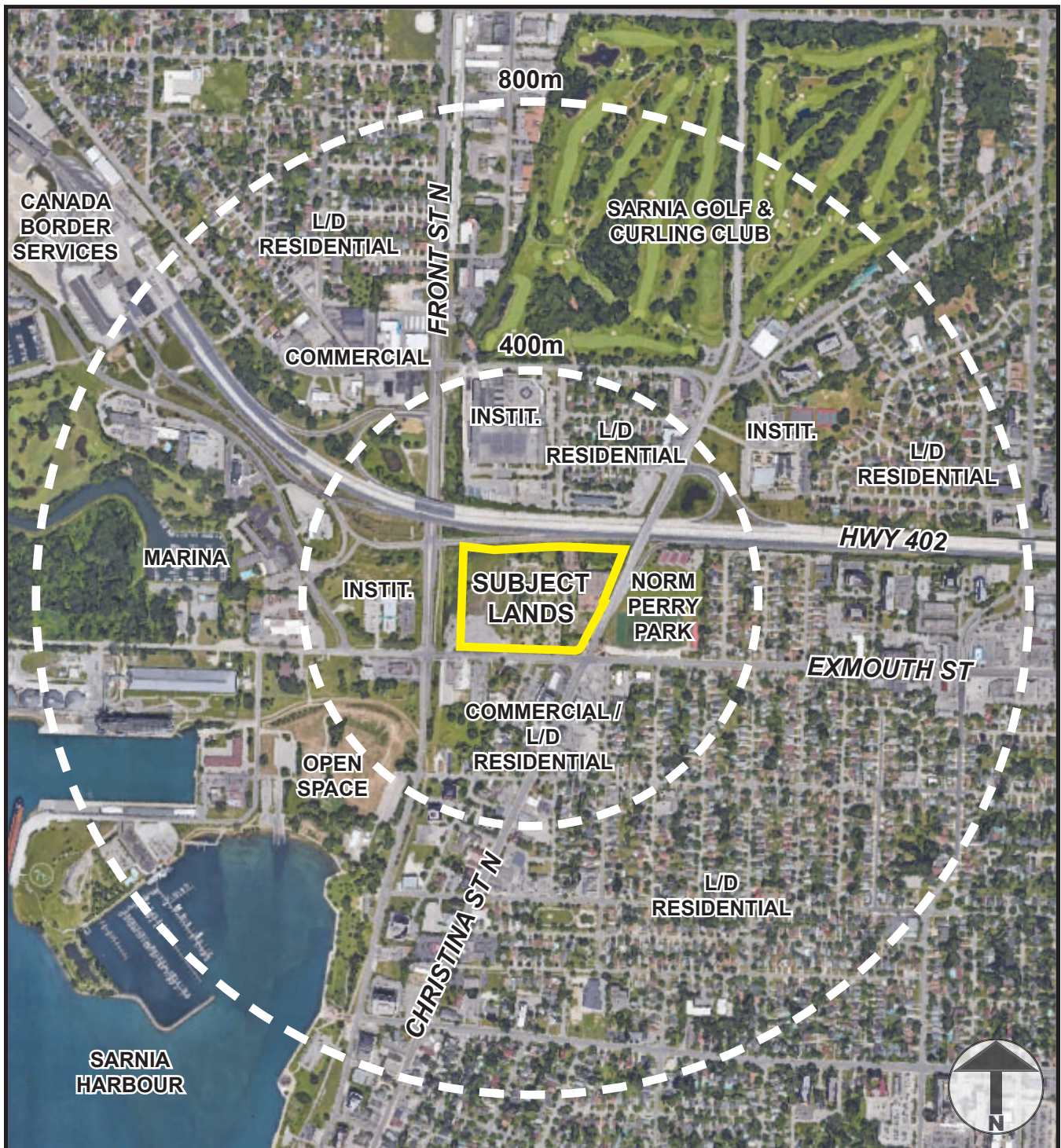
East: Norm Perry Park is located east of the subject lands, on the opposite side of Christina Street North. Located further east are low-density residential uses in the form of single detached dwellings. The City of Sarnia municipal boundary abuts the subject lands to the east.

South: A variety of commercial uses, including restaurants, retail stores, and gas bars, are located south of the subject lands. The City of Sarnia municipal boundary abuts the subject lands to the south.

West: Institutional uses, including Lambton Public Health and the Sarnia & District Humane Society, are located west of the subject lands.

Lands within an 800m, 10-minute walk radius are similar to those described above but also include low-density residential uses in the form of single detached dwellings located east, and south of the subject lands, adjacent to and beyond the commercial/institutional neighbourhood; and, recreational uses such as the Sarnia Golf & Curling Club and the marina to the north and east.

Located beyond the 800m radii is the Sarnia Harbor and Starlight Casino to the west; and, Bluewater Bridge (the vehicular access connecting Canada and the United States) to the northwest.



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FIGURE 2 - SURROUNDING CONTEXT

image retrieved from Google Earth

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200-206 EXMOUTH STREET
VILLAGE OF POINT EDWARD
COUNTY OF LAMBTON

Image 5 – Looking north from Hwy 402



Image 6 – Looking east from Christina St N

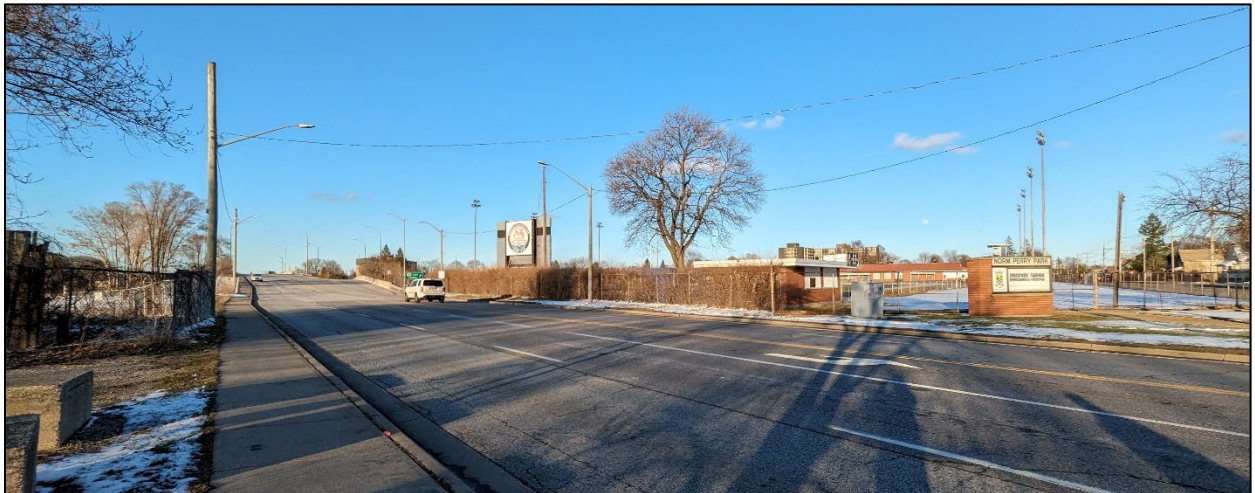


Image 7 – Looking south from Christina St N & Exmouth St intersection

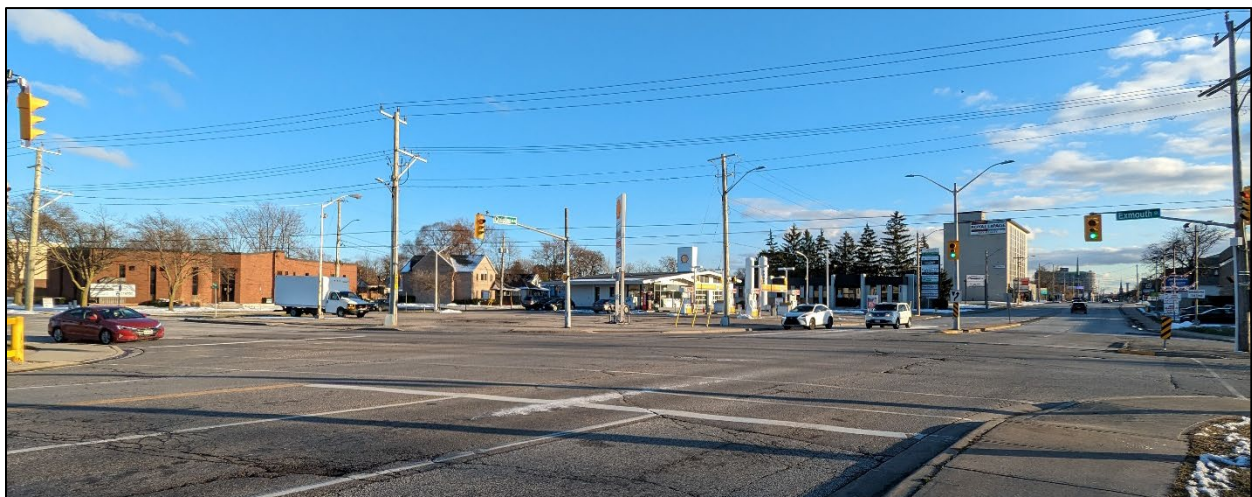
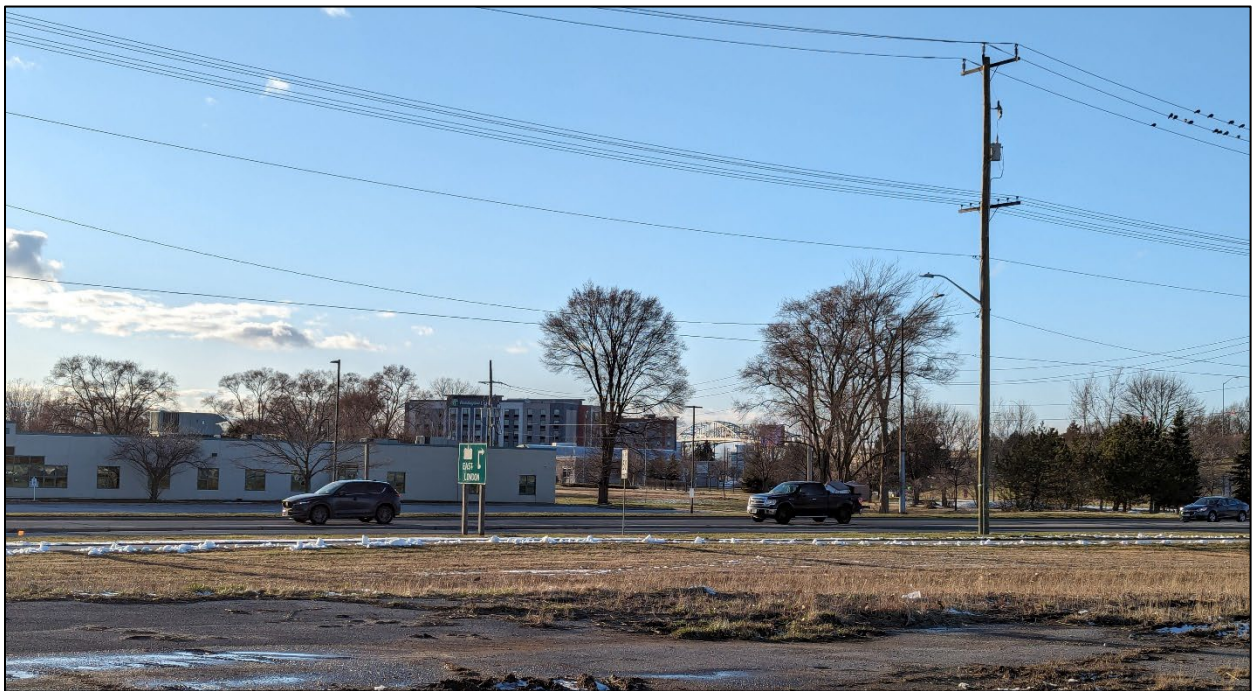


Image 8 – Looking west towards Front St



Image 9 – Looking northwest, towards Bluewater Bridge



3.2 Adjoining Land Uses

Section 11.1.6 of the Village of Point Edward Official Plan requires the design of proposed development within the “*Special Tourist Commercial*” land use designation to “*have regard for the planned function of adjoining lands in the Village and in the City of Sarnia*”. The land use designations and zoning classifications of lands adjoining the subject lands are as follows:

North: The subject lands immediately abut Highway 402 to the north, which identified in the Official Plan as a Provincial Highway and zoned “*Institutional 1 (I1)*”. Land uses beyond the Provincial Highway are designated as “*Mixed Use Commercial / Industrial*”, “*Commercial*”, and “*Residential*” in the Village of Point Edward Official Plan; and, are respectively zoned “*Mixed Commercial / Industrial (MCI)*”, “*Commercial 2 (C2)*”, and “*Residential 1 (R1)*” in the Village of Point Edward Zoning By-law.

East: The subject lands immediately abut Christina Street North and the City of Sarnia municipal boundary to the east. Norm Perry Park is located east of the subject lands, on the opposite side of Christina Street North, and is designated “*Parks and Open Space*” in the City of Sarnia Official Plan and zoned “*Major Open Space 1 (MOS1)*” in the City of Sarnia Zoning By-law.

South: The subject lands immediately abut Exmouth Street and the City of Sarnia municipal boundary to the south. On the opposite side of Exmouth Street, the lands are designated “*Mixed Use Corridor 2*” in the City of Sarnia Official Plan; and, are zoned “*General Commercial 1 (GC1)*” in the City of Sarnia Zoning By-law.

West: The adjoining lands to the west are designated “*Special Tourist Commercial*” in the Village of Point Edward Official Plan; and, are zoned “*Commercial 2 (C2.2.1(h1))*” in the Village of Point Edward Zoning By-law. It is noted that these lands received recent Official Plan Amendment and Zoning By-law Amendment approvals to permit two office buildings on the lands.

As detailed throughout this report, the proposed development will be complementary to, and compatible with, the surrounding land uses as noted above.

4.0 PROPOSED DEVELOPMENT

4.1 Background

A pre-application consultation meeting was attended by the agent, County staff, and Village staff in February, 2022, to discuss a high-density development proposal on the subject lands. County staff provided a development review document, which included a preliminary review of the development proposal and a list of information that was considered to be appropriate for complete applications for Official Plan Amendment, Zoning By-law Amendment, Subdivision/Condominium, and Site Plan Control Applications.

Subsequent to that discussion, it was determined that an appropriate approach to this development would be a phased application approach, beginning with the Official Plan Amendment application to establish high-level planning permissions on the subject lands to facilitate the proposed development. A follow-up meeting was held between the agent and County staff in March, 2023, and an email from County staff in April, 2023 outlined the submission requirements for an Official Plan Amendment application.

4.2 Proposed Development Details

The revitalization of the subject lands presents a unique opportunity to envision a complete community, which embraces dynamic public spaces, diverse housing options, efficient urban transportation solutions, and convenient access to retail amenities.

The envisioned redevelopment comprises of a mix of built-forms, encompassing low-, medium-, and high-rise structures ranging up to 30-storeys in height (see Figures 3-4). A diverse array of open spaces is proposed, featuring a spacious public park, an inviting urban plaza, linear landscaping throughout the development, and connected pedestrian pathways.

A diverse mix of uses is proposed, including residential dwellings, a comprehensive care campus, a boutique hotel, civic and community facilities, and commercial, office, and warehouse uses.

At this time, the envisioned development conceptually consists of approximately 1,900 residential units, being predominantly apartment units but including townhouse units; 130 hotel units; 250 campus of care units; 3,000m² of retail space; and, 3,000m² of public park space. A total of approximately 2,285 of units are proposed, including the hotel and campus of care units, equating to a density of approximately 330 units per hectare (UPH).

The conceptual plan was developed with careful consideration of the proposed uses, and the location and height of proposed buildings, and open space. A key focus point was on road placement and orientation, to prioritize the creation of strong street connections. Buildings were positioned to reflect the internal and external views of the site, utilizing the raised Highway 402 frontage to the north for the placement of the taller structures. At-grade retail spaces are oriented to address the Exmouth Street frontage. Mid-rise structures, being the proposed townhouse units,

are situated at the centre of the subject lands, to anchor the development, to provide an appropriate transition in built form, and create a welcoming neighbourhood scale and feel.

Linear open spaces connect through the site, promoting active transportation and creating natural links between the internal and external neighbourhoods. Landscaped areas are coordinated with building placement to screen loading and service areas.

Primary residential and retail parking is proposed to be located below-grade, accessed via entrances in each building. Visitor parking and drop-off areas are proposed to be located at-grade.

It is the intent of the proponent to implement the proposed development in multiple phases. Details of the phasing will be developed through the future Site Plan approval process(es). It is acknowledged that phasing may also be addressed through future holding provisions on the subject lands.



**FIGURE 3 -
CONCEPTUAL PLAN**
prepared by BDP Quadrangle

200 EXMOUTH ST OPA
MALLEUM PARTNERS
 200-206 EXMOUTH STREET
 VILLAGE OF POINT EDWARD
 COUNTY OF LAMBTON

MLM/PTE/21-01 MARCH 2024 NTS
 PROJECT NO. DATE SCALE

Zelinka Priamo Ltd.
 LAND USE PLANNERS

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**FIGURE 4 -
CONCEPTUAL PLAN**
prepared by BDP Quadrangle

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5.0 PROPOSED PLANNING ACT APPLICATION

5.1 Official Plan Amendment

The subject lands are designated “*Special Tourist Commercial*” in the Village of Point Edward Official Plan. The lands are proposed to be redesignated to a site-specific, special regulation “*Mixed Use*” designation. Alternatively, the subject lands could be redesignated to form a Special Policy Area to implement the proposed development. Many of the proposed uses are already permitted on the subject lands. The intent of the Official Plan Amendment is to provide greater flexibility in terms of land uses, building height, and residential densities in order for the proposed development to proceed as envisioned.

At this time, a Zoning By-law Amendment is not contemplated. The intent of this application is to implement high-level land use permissions for the subject lands. Subsequently, more detailed design will occur to determine specific factors and regulations such as building design, setbacks, lot coverage, etc.

Site-specific, special regulations would include an expanded range of uses, an increased maximum residential density, commercial floor space, and residential and commercial land area, under a site-specific “*Mixed Use*” designation. It is our professional opinion that a Special Policy Area can most effectively implement the proposed development, and will allow for the broadest level of flexibility.

A comparison of the anticipated and proposed uses of the development, and the existing permitted uses of the *Special Tourist Commercial* and *Mixed Use* designations is outlined in the table below.

Comparison of Land Uses		
<i>Proposed Uses</i>	<i>Permitted Uses – Special Tourist Commercial</i>	<i>Permitted Uses – Mixed Use</i>
<ul style="list-style-type: none"> Residential uses including townhouses, stacked townhouses, and apartments; Tourist accommodations (hotel); Seniors living facilities; Restaurants, including drive-thru restaurants; Open space and recreational uses; Retail shops and other commercial uses; Self-storage uses; Places of amusement and recreation; 	<ul style="list-style-type: none"> Places of entertainment (including games of chance); Automobile service uses; Truck service centre; Restaurants; Tourist accommodations; Retail shops; Tourist services; and, Other residential & office may be 	<ul style="list-style-type: none"> Predominant land uses shall be medium density and commercial uses; Residential uses include townhouses, stacked townhouses, and apartments; Marina and marina-related activities, retail stores, professional or business offices, restaurants, beverage rooms, service shops, commercial clubs, and similar commercial uses; Places of worship, community centres, post offices, libraries, and similar institutional uses; and,

<ul style="list-style-type: none"> Professional / business offices; Private commercial recreational facilities; and, Warehouses. 	<p>considered as part of a mixed-use development.</p>	<ul style="list-style-type: none"> Swimming pools, tennis courts, bowling greens, play facilities, picnic areas, and similar open space and recreational uses.
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In addition to an expanded range of permitted uses, the site-specific *Mixed Use* designation would amend the existing *Mixed Use* policies in the following ways:

- An increased maximum residential density, whereas 100 UPH is the current maximum permitted. The proposed residential density equates to approximately 330 UPH.
- An increased area to be developed as Residential/Commercial areas, whereas 80% is the current maximum area for these uses.
- An increased commercial retail floor space area, whereas 1,400m² is the current maximum.
- An increased commercial office space area, whereas 5,100m² is the current maximum.

In this instance, it is our professional opinion that it would be appropriate to remove the maximum limitations entirely relating to residential density, residential/commercial areas, and gross floor area for commercial/office space, in order to make the most efficient use of the subject lands and allow for the broadest level of flexibility. The Village of Point Edward has not seen a development of this nature, and as such, the current land use permissions do not contemplate a development of this scale and intensity.

At this preliminary stage, the proposed Draft Official Plan Amendment seeks to implement a site-specific *Mixed-Use* designation with the following special provisions:

- Permitted Uses:
 - Residential uses including townhouses, stacked townhouses, and apartments;
 - Tourist accommodations (hotel);
 - Seniors living facilities;
 - Restaurants, including drive-thru restaurants;
 - Open space and recreational uses;
 - Retail shops and other commercial uses;
 - Self-storage uses;
 - Places of amusement and recreation;
 - Professional / business offices;
 - Private commercial recreational facilities; and,
 - Retail Warehousing
- No maximum residential density;
- No maximum percentage of area to be developed as Residential/Commercial areas;
- No maximum commercial retail floor space area; and,
- No maximum commercial office space area.

It is important to note that future Planning Act applications, such as Zoning By-law Amendment (including holding provisions) and Site Plan Approval applications, will be required, and further regulations are anticipated to be implemented through those application processes.

6.0 POLICY ANALYSIS

6.1 Planning Act, RSO 1990

In considering an Official Plan Amendment application, the Planning Act states that regard shall be had for the items in **Section 2** which address matters of provincial interest, such as:

(f) the adequate provision and efficient use of communication, transportation, sewage and water services, and waste management systems;

- The proposed redevelopment of the subject lands will make efficient use of existing major transportation networks, being a Provincial highway and arterial roads, and existing municipal services.

(h) the orderly development of safe and healthy communities;

- The subject lands are located within an existing built-up area, being the Village of Point Edward, and are some of the only underdeveloped, underutilized lands within the Village and County. The subject lands are an appropriate location for intensification considering the established surrounding communities, and as such, continue the orderly development pattern.

(j) the adequate provision of a full range of housing, including affordable housing;

- The proposed development provides an opportunity to establish approximately 1,900 residential dwelling units on the subject lands, in a mix of built forms, significantly contributing to the housing supply in the County and Village.

(k) the adequate provision of employment opportunities;

- The proposed redevelopment of the subject lands offers a wide range of employment opportunities through the proposed hotel, commercial/office, and campus of care uses, to add to the existing supply of employment uses in the area.

(o) the protection of health and safety;

- A professional environmental engineering consulting firm, S2S Environmental, has been retained to complete environmental assessments of the brownfield lands, which have been and continue to be undertaken. A Risk Assessment Report is currently under review with the Ministry of Environment, Conservation and Parks.

(p) the appropriate location of growth and development;

- The subject lands are located within an *Urban Centre* within the County of Lambton, which is the desired location for growth and development within the County. Additionally, the

subject lands already have existing land use permissions in place which could facilitate significant development, indicating that the County and Municipality have already considered these lands to be appropriate for development.

(r) the promotion of built form that is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.

- The subject lands are considered to be a significant “gateway” site to the Village, County, and Canada given its history, size, and location proximate to the Canada/United States border. The proposed redevelopment is intended to incorporate all aspects of a complete community, with high-quality urban design elements such as an attractive built form and welcoming public spaces to acknowledge both the scale of the development and the significance to the community.

Given the above, and further explored in Section 6.2 of this report, the proposed development has regard for matters of provincial interest and is consistent with Section 2 of the Planning Act.

6.2 Provincial Policy Statement, 2020

The Provincial Policy Statement (PPS), 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 development and protection of natural resources. All planning applications, including Official Plan Amendment applications, are required to be consistent with these policies. The policy analysis describing how the proposed application is consistent with the stated policies within the PPS is detailed in the below table.

Provincial Policy Statement (2020) Policy Analysis Table	
Policy	Response
<p><u>Section 1.1.1</u></p> <p>Healthy, liveable and safe communities are sustained by:</p> <p>a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;</p> <p>b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and</p>	<p>The proposed development is an efficient and appropriate form of intensification for the subject lands, and will add to the range and mix of residential and commercial uses to satisfy the long-term housing and employment needs identified in the Village of Point Edward.</p> <p>The proposed development is a compact and cost-effective form that will utilize existing and emerging municipal services within an existing built-up area of the Village and surrounding City of Sarnia. Thus, the consumption of land and servicing costs are minimized.</p>

<p>e) open space, and other uses to meet long-term needs; promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;</p>	
<p><u>Section 1.1.2</u></p> <p>Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. However, where an alternate time period has been established for specific areas of the Province as a result of provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.</p> <p>Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.</p>	<p>Based on annual dwelling allocations in the County of Lambton Official Plan, the proposed development represents a supply of land beyond the 25-year time horizon. However, it is important to note that the proposed development will be implemented in phases over an extended period of time.</p> <p>It is important to recognize the current housing crisis, and shortage of housing being experienced across the province. The County Official Plan was adopted in 2017, and declared to be in full force and effect in 2020. These dates predate the COVID-19 pandemic and concurrent housing crisis. As such, the annual dwelling allocations in the County Official Plan are likely to be conservative and no longer an accurate representation of the housing demand. Many Counties and Municipalities across the province are undertaking updated population projection studies to address the housing crisis, post-pandemic.</p>
<p><u>Section 1.1.3.1</u></p> <p>Settlement areas shall be the focus of growth and development.</p>	<p>The subject lands are located within a settlement area, being within the built-up area of the Village of Point Edward. The proposed redevelopment of the subject lands promotes vitality and regeneration by intensifying the use of the land with a compact and efficient form of development on an underutilized parcel that is connected to existing infrastructure, and will facilitate the development of future and appropriate infrastructure levels to accommodate the development.</p>
<p><u>Section 1.1.3.2</u></p>	<p>The proposed development broadens the range of residential and non-residential built forms and intensities in the immediate area, and compliments</p>

<p>Land use patterns within settlement areas shall be based on densities and a mix of land uses which:</p> <ul style="list-style-type: none"> a) efficiently use land and resources; b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion; e) support active transportation; f) are transit-supportive, where transit is planned, exists or may be developed; 	<p>the range and intensities of mixed forms in the surrounding area. It makes efficient use of underutilized land, resources, infrastructure, and existing transportation networks by increasing the density (UPH) on the subject lands. The subject lands are serviced by pedestrian sidewalks via the Christina Street North, Exmouth Street, and Front Street North rights-of-way, supporting the use of active transportation; and, are situated along an existing transit route as well as the proximate to Highway 402, providing connections throughout the surrounding City of Sarnia and greater southwestern Ontario.</p>
<p><u>Section 1.1.3.3</u></p> <p>Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.</p>	<p>The proposed development is considered to be intensification as it proposes a greater number of residential dwelling units than what currently exists. The subject lands are considered an appropriate location for intensification as they are located on an arterial road with public transit service; are proximate to amenities; and, are sufficiently sized to accommodate the proposed number of dwelling units and range of uses, while also providing appropriate public open space.</p> <p>The subject lands are unique in that they are generally vacant, undeveloped land in a primarily built-up area and therefore are separate and distinct from the commercial/institutional neighbourhood to the north, east, south, and west.</p>
<p><u>Section 1.1.3.4</u></p> <p>Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.</p>	<p>Through future development applications, the proposed development will utilize site-specific zoning regulations that are generally applied to this level of intensification, including appropriate building height, setbacks, landscaped space, and parking.</p> <p>The proposed amendments relating to densities and a range of land uses achieve a more intense form of compact intensification, and are supported by the applicable technical studies provided. There are considered to be no significant risks to public health and safety from the proposed development.</p>
<p><u>Section 1.1.3.6</u></p> <p>New development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the</p>	<p>The proposed development is within an existing built-up area. The proposed density of 330uph is reflective of a compact and efficient form of housing which adds to the mix of uses and densities in this area marked for significant growth.</p>

<p>efficient use of land, infrastructure and public service facilities.</p>	
<p><u>Section 1.4.3</u></p> <p>Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:</p> <ul style="list-style-type: none"> b) permitting and facilitating: <ul style="list-style-type: none"> 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3; c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs; d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed; e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and, f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety. 	<p>The proposed development contributes to the range and mix of housing types to accommodate future growth in the Village of Point Edward, and is consistent with the policy intent to encourage appropriate intensification.</p> <p>This proposed development is considered appropriate intensification as it takes advantage of existing infrastructure and public services; establishes a high-density use along a high-order road; utilizes vacant land; supports the use of existing active transportation and public transit routes; contributes to housing supply; and, has a compact and cost-effective built form.</p> <p>Residential apartments and townhouses can help provide for more affordable types of housing in comparison to the low-density, single detached character of the broader surrounding neighbourhoods. The proposed development will offer a wide range of unit types and sizes which will help contribute to the range of housing affordability in the Village of Point Edward.</p>
<p><u>Section 1.5.1</u></p> <p>Healthy, active communities should be promoted by:</p>	<p>The proposed parkland features natural and recreational opportunities for both existing and future residents proximate to the subject lands and</p>

<p>b) planning and providing for a full range and equitable distribution of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources.</p>	<p>beyond. The proposed park contributes to the publicly accessible green space in the immediate and surrounding area and conforms to emerging County and Village policies addressing green corridors.</p> <p>The proposed public parkland accounts for approximately 4.7% of the subject lands, with consideration given to the <i>Planning Act</i> which requires that new development provide a 5% parkland contribution (made up of either physical land, cash-in-lieu, or a combination).</p>
<p><u>Section 1.6.6.2</u></p> <p>Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.</p>	<p>The proposed development will make full use of municipal services. There is existing water supply infrastructure, sanitary forcemain, and storm sewers in the vicinity of the subject lands that can be utilized for servicing. Infrastructure upgrades will be required to facilitate the proposed development, and are detailed in Section 7 of this report.</p>
<p><u>Section 1.8.2</u></p> <p>Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which:</p> <ul style="list-style-type: none"> a) promote compact form and a structure of nodes and corridors; b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas; e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; and, f) promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation and green infrastructure. 	<p>The proposed development provides a variety of compact built forms, being mid- to- high-rise residential. A clear hierarchy of street networks are provided and integrated into the existing street networks to maximize efficiency and emergency access.</p> <p>The public realm is prioritized throughout the proposed development, promoting the actionable use of public transit systems, active transportation options, and sustainable lifestyles. Connections to surrounding public and active transportation networks would support a minimal reliance on cars and private travel. The proposed mixed-use community provides the opportunity for residents to live, work, and play on the subject lands, reducing the necessity for daily transportation use.</p> <p>Open spaces and landscaped areas are situated and scaled throughout the subject lands. It is the intention that passive water management and native plantings be developed throughout the future Site Plan Approval process.</p>

6.3 Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS, 2024) is a streamlined province-wide land use planning policy framework that replaces both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 while building upon housing-supportive policies from both documents. The PPS, 2024 provides municipalities with the tools and flexibility they need to build more homes. It enables municipalities to:

- Plan for and support development, and increase the housing supply across the Province;
- Align development with infrastructure to build a strong and competitive economy that is investment-ready;
- Foster the long-term viability of rural areas;
- Protect agricultural lands, the environment, public health and safety.

While the PPS, 2024 will not take effect until October 20th, 2024, the intent of the policy document in regards to this application has been taken into consideration. The proposed Official Plan Amendment is consistent with the PPS, 2024 for the following reasons:

- The proposed development makes efficient use of underutilized land that will make use of existing and future municipal infrastructure and servicing (2.3.1.2, 3.6.2);
- The proposed uses provide for an appropriate mix and range of employment uses on the subject lands (2.8.1.1);
- The proposed development assists the Village in providing an appropriate range and mix of housing options to accommodate residential growth for a minimum of 15 years (2.1.4.a); and,
- The proposed development provides an appropriate range and mix of housing options and densities, from medium-density townhouses to high-density apartments, through redevelopment and intensification to meet projected needs of current and future residents (2.2.1).

6.4 County of Lambton Official Plan

The Lambton County Official Plan establishes the framework necessary to assist local municipalities in the preparation of plans and policies which reflect local needs and circumstances, in a manner that satisfies the Planning Act requirements regarding the Provincial Policy Statement. The subject lands are designated “*Urban Centre*” according to ‘Map 1 – Growth Strategy’ in the Plan (see Figure 5), which contemplates the proposed development.

The following table contains a policy analysis detailing how the proposed development conforms with the plan:

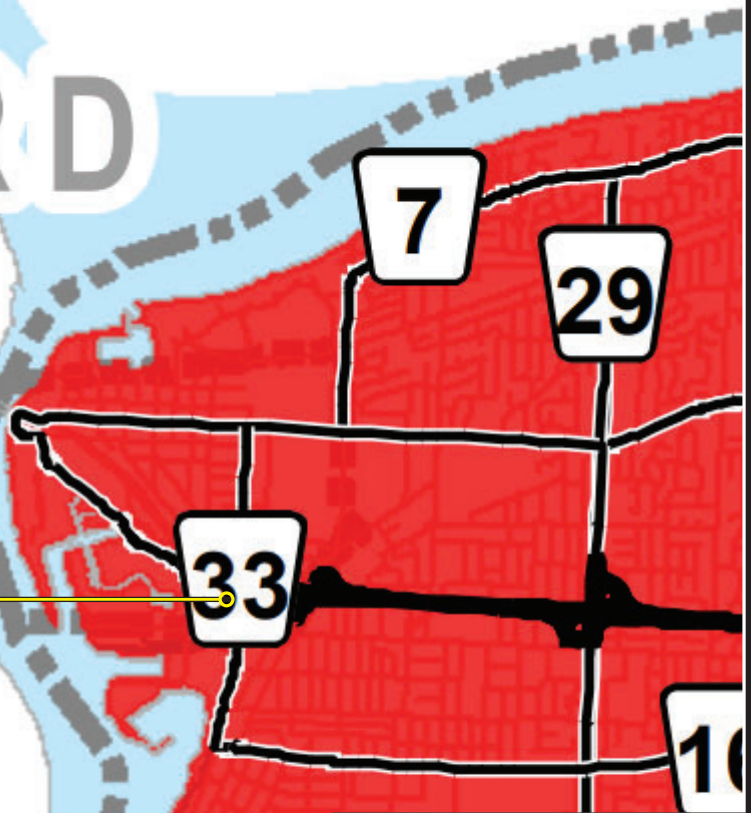
Lambton County Official Plan Policy Analysis Table	
Policy	Response
<p><u>Section 2.1</u></p> <p>Goals: To ensure that communities are places where people of all ages, backgrounds, and capabilities can meet their individual needs for human development throughout the various stages of their lives by providing opportunities for secure long-term housing, access to healthy food, employment, entrepreneurship, learning, culture, recreation, and physical, social, emotional, and spiritual well-being in a manner that is environmentally sound.</p>	<p>The proposed development helps to achieve the County's goal of providing complete communities by providing housing types for people of all ages, including campus of care, apartment, and townhouse dwellings.</p> <p>Further, the proposed development provides a variety employment, retail, and recreational opportunities including the hotel, various commercial/office/retail spaces, and a public park.</p>
<p><u>Section 2.1.4</u></p> <p>This Plan promotes a built form that is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.</p>	<p>The subject lands are significantly underutilized in their current vacant form. Intensification on the subject lands provides an opportunity to improve and enhance the existing public realm condition and better integrate the lands into the surrounding urban fabric.</p> <p>From a built-form perspective, the subject lands are contextually appropriate in terms of size and location for a development of this scale, given their location adjacent to a Provincial Highway and adjacency to existing commercial, institutional, and recreational opportunities.</p>

POINT EDWARD



SUBJECT LANDS
6.9ha

River



LEGEND

- Urban Centre
- Urban Settlement
- ▨ Lakeshore Development Areas
- Secondary Settlement
- Petrochemical Industrial Land
- Gas Compressor Station
- HWY. 402 Service Centres
- Agricultural Area
- Recreation and Conservation Area
- Thedford Marsh
- St. Clair Parkway (St. Clair Township)

Project No.: MLM/PTE/21-01

Date: MARCH 2024

Scale: NTS



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FIGURE 5 - COUNTY OF LAMBTON OFFICIAL PLAN MAP 1 - GROWTH STRATEGY

200 EXMOUTH ST OPA
MALLEUM PARTNERS
200-206 EXMOUTH STREET
VILLAGE OF POINT EDWARD
COUNTY OF LAMBTON

<p><u>Section 2.1.6</u></p> <p>New development will be located to ensure the maximum use of existing and future public facilities and services, including education, recreation, health care, social services, cultural activities, and physical infrastructure. Areas designated as focuses for residential development should be contiguous to existing centres and contain a range of commercial and community services.</p>	<p>The proposed development introduces residential permissions to a primarily commercial/institutional area and increases employment opportunities. The subject lands are proximate to a wide range of amenities and public services easily accessible by existing public and active transportation options.</p> <p>The residential housing options surrounding the subject lands within an 800m radius primarily consist of low-density, single-detached dwellings. The proposed apartment and townhouse buildings are a compact built-form that will diversify the range and mix of housing types and provide affordability options in the surrounding area. It will intensify the public realm by creating a strong street presence along both Christina Street North and Exmouth Street, and by providing an attractive and inviting publicly accessible green space.</p> <p>The proposed development provides significant opportunity to take advantage of existing employment and recreation opportunities, by implementing approximately 1,900 residential dwelling units on the subject lands, greatly advancing the area population.</p>
<p><u>Section 2.1.7</u></p> <p>Growth will be managed so as to provide communities with a range of opportunities for work and recreation, and a choice of housing. A diverse range of activities, based on the needs of the community, including learning, health, arts, cultural, spiritual, and recreational activities are promoted by this Plan.</p>	<p>The proposed development provides new employment opportunities in this part of the County with the introduction of a hotel along with considerable retail/office space. In addition, a wide choice of housing options and recreational opportunities are contemplated.</p>
<p><u>Section 2.3.1</u></p> <p>An adequate supply of housing will be ensured by:</p> <ul style="list-style-type: none"> a) maintaining the ability to accommodate residential growth for a minimum of 10 years through intensification and redevelopment, and if necessary, lands designated for residential development. 	<p>The subject lands are well-suited to accommodate the proposed development and will greatly contribute to the housing supply to meet current and future demands for housing in the area.</p>
<p><u>Section 2.3.2</u></p> <p>The County encourages the construction of an adequate supply of dwelling units to meet the needs of the local housing market. This is expected to average 449 dwelling units per year in the beginning portion of the planning period.</p>	<p>The proposed 1,900-unit development will greatly contribute to the Village and the County in achieving their housing goals.</p>

<p><u>Section 2.3.6</u></p> <p>Proponents of residential development are encouraged to provide a broad mix and range of lot sizes, dwelling types, and tenure choices suited to the needs and desires of the residents of the community.</p>	<p>The proposed development provides a range of housing types, including townhouse units, campus of care units, and apartments units, that will contribute to a mix of unit sizes and housing stock to accommodate people at all stages of life, household sizes, and levels of affordability.</p> <p>As previously noted, the existing residential area proximate to the subject lands is primarily composed of low-density residential housing forms, such as single detached dwellings. The proposed development provides an opportunity to broaden the mix of range of dwellings types and tenure choices in the community.</p>
<p><u>Section 2.3.12</u></p> <p>Local municipalities are encouraged to provide opportunities for the intensification of housing. Techniques may include permitting second units in existing dwellings or detached accessory buildings, encouraging the creation of infill lots, directing housing to vacant lots in existing residential areas, the conversion of existing buildings for residential purposes, redevelopment of sites not previously used or underutilized for residential purposes, and higher densities in new development. Rooming, boarding and lodging houses may be permitted where appropriate. It is a goal of this Plan that 20% of the new housing units provided in the County be provided through intensification and redevelopment.</p>	<p>The subject lands are currently vacant and underutilized. The proposed development and associated Official Plan Amendment application would effectively facilitate significant intensification and redevelopment on the subject lands for high-density residential uses.</p>
<p><u>Section 3.2.1</u></p> <p>Map 1 shows and delineates a three level settlement hierarchy, consisting of (1) Urban Centres, (2) Urban Settlements, and (3) Secondary Settlements. The majority of growth will be directed to Urban Centres and Urban Settlements.</p>	<p>The subject lands are located within an Urban Centre, being the appropriate location for growth.</p>
<p><u>Section 3.2.11</u></p> <p>Development in Urban Centres, Urban and Secondary Settlements, and the Agricultural Area will promote an efficient and compact land use pattern to minimize land consumption, control infrastructure costs, and limit non-farm growth pressure in Agricultural Areas.</p>	<p>The proposed development is a compact, high-density form of development, including high-ruse, mixed-use buildings that will utilize existing transportation networks; public transit and pedestrian infrastructure; and, municipal services.</p>
<p><u>Section 7.1.9</u></p> <p>Large development proposals that are likely to generate significant traffic volumes may require a transportation study so that their impact on County</p>	<p>A <i>Transportation Impact Study</i> was prepared by Paradigm Solutions Ltd. and is summarized in Section 7.2 of this report.</p>

roads and surrounding land uses can be properly assessed.	
<p><u>Section 7.10.2</u></p> <p>In areas serviced by full municipal water and sewage services, approval of development applications will not occur unless there is adequate uncommitted reserve capacity available for water, sanitary, and storm water services. The calculation of this uncommitted reserve capacity will consider any allocations made to draft approved developments and designated lands that have not yet been constructed.</p>	A <i>Servicing Brief</i> was prepared by MTE Consultants and is summarized in Section 7.3 of this report, including commentary relating to water and sanitary services.
<p><u>Section 7.10.5</u></p> <p>All development proposals will have regard for stormwater drainage and surface water infiltration on-site in direct relation to the scale of the development.</p>	A <i>Servicing Brief</i> was prepared by MTE Consultants and is summarized in Section 7.3 of this report, including stormwater services.

The development, as proposed, provides substantial housing and economic opportunities in an appropriate location, being a gateway site to both Lambton County and Canada. Given the above, the proposed development and associated amendment is in general conformity with the policies established in the County of Lambton Official Plan.

6.5 Village of Point Edward Official Plan

The Village of Point Edward Official Plan provides guidance for the development and planning of land uses within the Village for a period extending to the year 2046. The purposes of the policies contained within the Plan is to provide a planning policy framework for decision-making by the Village, its Committees, and other public bodies; to serve as a guide for the public and the business community regarding the growth and development of the Village; and, to provide a local context for the application of Provincial and County planning policies. These policies have been established primarily to guide the physical development of the Village while having regard to relevant social, economic, and environmental matters.

The subject lands are designated “*Special Tourist Commercial*” according to ‘Schedule “A”’ (see Figure 6) of the Official Plan.

Section 11.1.1 states that the permitted uses shall include places of entertainment, automobile service uses, truck service centres, restaurants, tourist accommodations, retail shops, and tourist services. The proposed Official Plan Amendment seeks to redesignate the subject lands to a site-specific *Mixed Use* designation, or implement a Special Policy Area, intended to permit the following uses:

- Residential uses, including townhouses, stacked townhouses, and apartments;
- Places of entertainment (including games of chance);
- Restaurants, including drive-thru facilities;
- Retail shops;

- Hotels, motels, and related tourist facilities;
- Places of amusement and recreation;
- Private commercial recreational facilities such as fitness and health clubs;
- Seniors living facilities;
- Warehouses;
- Open space and recreational uses; and,
- A variety of commercial and office uses.

Within the *Special Tourist Commercial* designation, development shall be designed primarily to attract service and commercial trade from the Highway 402 corridor (**Section 11**). As such, the current planned function of the subject lands is to create a 'destination' area for visitors of the Village of Point Edward and City of Sarnia, with the successful operation of businesses.

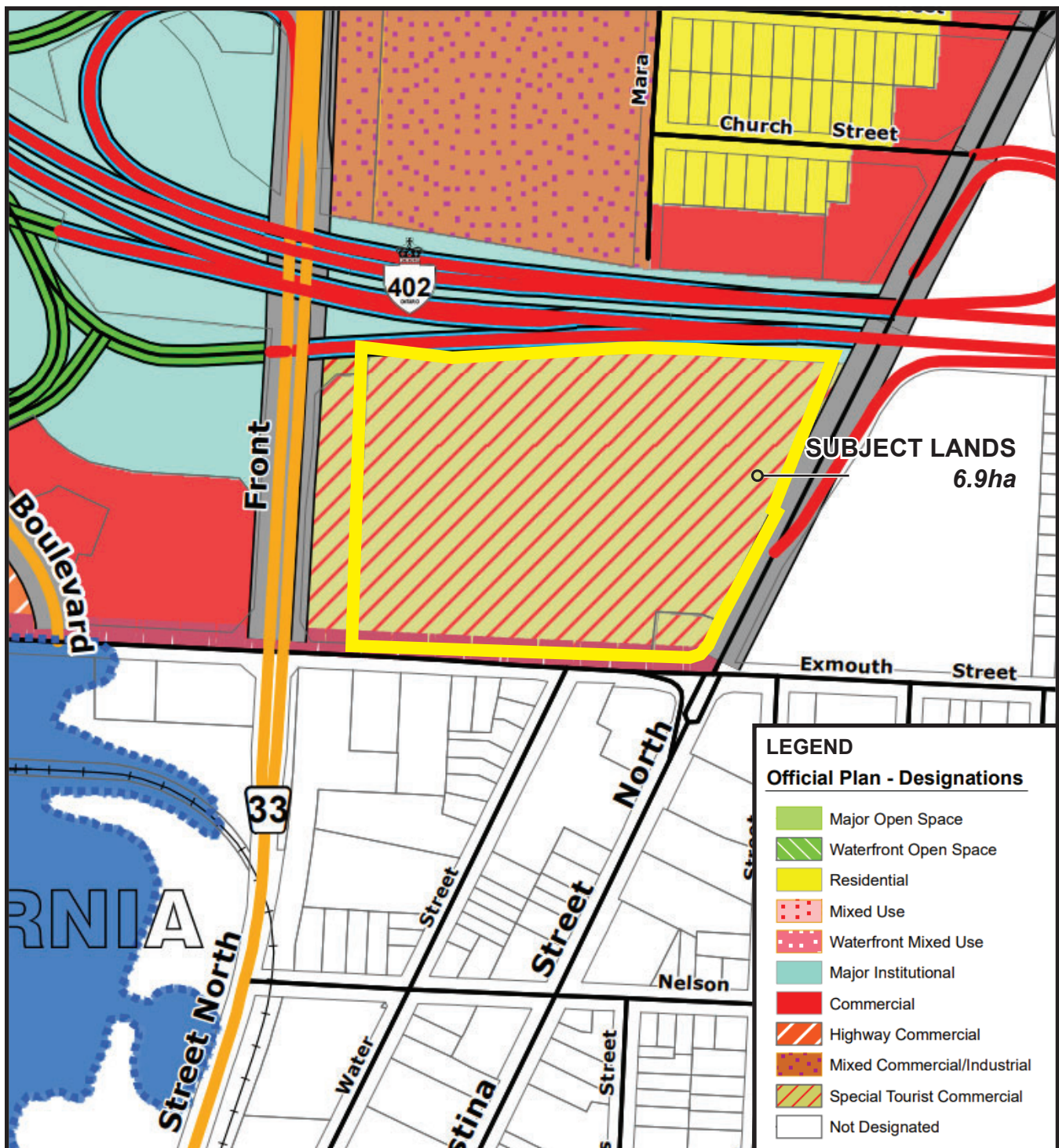
The proposed development and associated Official Plan Amendment application is consistent with the original intent and purpose of the '*Special Tourist Commercial*' designation by providing a wide range of potential commercial and retail uses to be utilized by current and future residents, as well as visitors from the Highway 402 corridor. The proposed development will have a high-level of visibility from the Highway, given the proposed building heights, to specifically attract tourists and other travellers. The proposed development also provides 10-storeys of hotel use, to further make the subject lands an attractive site for visitors to the Village and City.

The inclusion of "Warehouse" as a permitted use is intended to permit the "Retail Warehouse" use, as defined in the Village of Point Edward Zoning By-law, through a future Zoning By-law Amendment application. As noted throughout this report, the proposed Official Plan Amendment seeks to provide a wide range of commercial and retail uses on the subject lands, including both small- and large-scale retail uses, to provide a reasonable level of flexibility for the attraction of future tenants. This is consistent with the original intent and purpose of the '*Special Tourist Commercial*' designation to attract tourist and commercial trade from the Highway 402 corridor, by introducing a mix of retail options to the subject lands.

Additionally, many of the proposed land uses (apartments, restaurants, retail shops, hotels, seniors living facilities, open space and recreational uses, and a variety of commercial and office uses) are already permitted uses on the subject lands under the current land use designation. It is noted that the adjoining lands to the west are also within the '*Special Tourist Commercial*' land use designation, and as such, the proposed land uses are considered to be compatible, and consistent with the planned function of the adjoining lands. The lands to the south are identified as being within the '*Strategic Growth Area*' as per the City of Sarnia Structure Plan, which are areas expected to intensify over time and include a mix of residential, retail and service commercial uses, as well as offices (**Section 5.3**). The proposed Official Plan Amendment to facilitate the creation of a mixed-used community is consistent with this intent.

Given this, it is our opinion that the intent and purpose of the Official Plan is maintained.

The following table contains a policy analysis detailing how the proposed development conforms with the plan:



Project No.: MLM/PTE/21-01

Date: MARCH 2024

Scale: NTS



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FIGURE 6 - VILLAGE OF POINT EDWARD OFFICIAL PLAN SCHEDULE 'A'

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MALLEUM PARTNERS
 200-206 EXMOUTH STREET
 VILLAGE OF POINT EDWARD
 COUNTY OF LAMBTON

Village of Point Edward Official Plan (2021 Consolidation) Policy Analysis Table	
Policy	Response
<p><u>Section 13.2.4</u></p> <p>Mixed Use development shall take place only in areas where such development will have little effect on the existing residential areas of the Village. It should be designed so as to create a relatively self-sufficient community that will not burden the existing amenities and services of the Planning Area.</p>	<p>In the context of infill and intensification developments, adverse impacts are typically considered to be loss of privacy, noise, and the visual impacts of site development (view obstruction, shadowing). For the proposed development, it is anticipated that privacy will be maintained through the use of landscaping and appropriate building setbacks. Considering there are no sensitive uses abutting the subject lands, the adverse impacts are considered to be minimal.</p> <p>Noise levels from the mixed-use buildings will be typical of that expected from a development of this nature and will be significantly less than the traffic noise generated from the surrounding road network and land uses, considering the subject lands adjacency to Highway 402.</p> <p>The proposed buildings will not obstruct any significant views as the subject lands are bound on all sides by major transportation networks.</p> <p>The visual impacts of the development on surrounding land uses will be minimal given the spatial separation of the proposed buildings from other lands, and future landscaping treatments. Any shadowing from the proposed buildings onto abutting lands is anticipated to be mitigated due to the proposed setbacks. It is anticipated that a Shadow Study will be required as part of future development applications.</p> <p>Adverse impacts and compatibility issues are appropriately accounted for and mitigated; thus, the subject lands are an appropriate location for the proposed development. It is important to note that many of the proposed uses are already permitted under the existing <i>Special Tourist Commercial</i> designation.</p> <p>Further, the subject lands are capable of providing the facets of a complete community with a variety of amenity and services to achieve a level of self-sufficiency.</p>
<p><u>Section 13.2.6</u></p> <p>Development shall have access to an arterial or collector road without having to travel through</p>	<p>The subject lands are well-located, and of a sufficient size and configuration, to accommodate the proposed residential intensification. The</p>

<p>areas of Residential designation before reaching an arterial or collector road.</p>	<p>proposed development is located along a major arterial road that is supported by public transit and pedestrian sidewalks, and is proximate to open space, commercial, and employment opportunities in the surrounding areas. Access to the subject lands does not generally require travelling through the proximate established residential areas.</p>
<p style="text-align: center;"><u>Section 22.6</u></p> <p>The design and siting of high density residential development will minimize potential negative effects on all other types of dwellings.</p>	<p>The proposed amendment provides a development that:</p> <ul style="list-style-type: none"> • Introduces a new range of unit sizes, layouts, and housing types to the area; • Provides high-quality urban design features to promote compatibility; • Establishes residential densities which are appropriate to the neighbourhood and result in compact development; and, • Incorporates mixed-use and multi-unit residential development in an area appropriate for intensification. <p>The subject lands are well-suited to accommodate the proposed development and can contribute to expanding the range of housing forms and tenures to meet current and future demand for housing in the area.</p> <p>The inclusion of a range of residential unit sizes supports the intent of providing housing choice for residents in the area that is otherwise primarily dominated by commercial and institutional uses, but does not detract from the viability of the established low-density residential areas.</p>
<p style="text-align: center;"><u>Section 23.1</u></p> <p>The Village shall encourage the conservation, retention and enhancement of significant heritage buildings and the Village will encourage a unique sense of place and identity by promoting excellence in building construction and design, integrated site amenities, attractive streetscaping, and the integration of publicly accessible open space areas.</p> <ol style="list-style-type: none"> a) Parking areas, loading areas and waste disposal storage areas should be screened from adjacent public roads by buildings and landscaping; b) Landscaped strips should be installed around the entire periphery of the property, except for entrances, exits and 	<p>The Conceptual Design Package details the following design goals:</p> <ul style="list-style-type: none"> • Create a vibrant and sustainable urban master plan that embraces the history of the site while drawing new jobs and residents into the area. • Establish a clear hierarchy of streets that functions as a transportation network that serves both pedestrian and vehicular traffic. • Dedicate vehicular lanes on the main arteries; clearly separate drop-off areas, loading areas, and parking access; and, privilege active pedestrian edges and frontages.

<p>interconnections with adjacent properties for pedestrians and vehicles;</p> <p>c) Parking areas should be paved, curbed and landscaped to an acceptable standard;</p> <p>d) The exterior facade of buildings exposed to abutting public roads should be designed to complement the existing streetscape;</p> <p>e) Exterior signs should be uniform in appearance, in terms of location, size, shape, materials and colours to encourage design quality; and</p> <p>f) Off-street interconnections for pedestrians and vehicles between existing and proposed development will be encouraged.</p> <p>The Village will promote the benefits of healthy active lifestyles by linking neighbourhoods, parks and facilities, the waterfront and natural features through an active transportation network.</p>	<ul style="list-style-type: none"> Explore and propose a mix of uses and amenities that can support a complete community. <p>The proposed development provides service areas (parking, loading, garbage) that are screened using building orientation, placement, and massing.</p> <p>The public park, linear landscapes, and trail areas are designed to be key open spaces, while sidewalks and peripheries of buildings are proposed to be landscaped to create natural transitions between park spaces, plazas, linear landscapes, and front doors.</p> <p>The circulation network is designed to consider different types of travel across the site, accommodating foot traffic and cyclists through street layouts, building placement, and open space pathways.</p> <p>Landscaping, parking areas, exterior façades, and signage will be designed according to Village standards at the time of future Zoning By-law Amendment and/or Site Plan Approval applications.</p>
<p><u>Section 25.1.1</u></p> <p>For all areas, it is the intent of the Village:</p> <p>a) To contribute to an enhanced sense of community in the Village.</p> <p>e) To enhance the economic potential of the Village in order to foster employment generating activity.</p> <p>f) To provide sufficient lands for employment uses to provide opportunities and options for a variety of employment.</p> <p>h) To identify and promote opportunities for intensification and redevelopment within Brownfield sites.</p> <p>j) To encourage infilling in vacant lots, on brownfields, or on other underutilized land.</p>	<p>The proposed development concentrates a higher form of mixed-use density along the frontages of arterial roads, proximate to public transit and major transportation networks, and within walking distance of commercial, retail, recreational, and employment opportunities which will enhance the continued viability of neighbouring land uses.</p> <p>To date, the Village has not experienced development of this scale and intensity. The proposed amendment facilitates redevelopment of significant vacant, brownfield, and underutilized lands with a mix of land uses and densities.</p>
<p><u>Section 28</u></p> <p>The former foundry site at Christina, Exmouth and Front Streets is recognized as an important site for future high-quality development. It is a gateway site into Canada, Lambton County, and the Village and warrants specific mention for collaborative, cooperative, and innovative approaches to future site design and development.</p>	<p>The subject lands are considered to be a gateway site into the Village, County, and Canada. The proposed development is innovative and of an appropriate caliber and scale to recognize this distinction, and will achieve the overall goal of establishing high-quality development at an important location.</p>

The proposed development represents an appropriate and compatible form of mixed-use intensification at an appropriate location, and is generally in conformity with the policies and intent of the Village of Point Edward Official Plan. The proposed development is consistent with the planned function of the “*Mixed Use*” land use designation, and the intention of the former foundry site to provide high-quality intensification with a range and mix of land uses, housing unit types, and residential densities to achieve a complete community.

7.0 ADDITIONAL CONSIDERATIONS

7.1 Public Consultation Strategy

It is proposed that the public consultation process for the proposed application follow the statutory requirements as set forth in the *Planning Act*. The following procedure of public consultation is proposed:

- Adequate information and material, including a copy of the proposed development, to be made available to the public;
- A public meeting be held for the purpose of giving the public an opportunity to make representations in respect of the proposed development; and,
- If deemed necessary, an open house be held for the purpose of giving the public an opportunity to review and ask questions about the information and material made available.

The consultation strategy proposed will provide members of the public with meaningful opportunities to review, understand, and comment on the proposed development and associated application. In addition to the statutory requirements, the land owner will host a developer-led Open House to provide the public with further opportunity to provide input. This Open House is to be held during the application review process, subsequent to the application being deemed complete by the Village.

7.2 Environmental Considerations

The subject lands are considered to be brownfield lands due to the former on-site manufacturing uses. S2S Environmental was retained to conduct environmental assessments of the lands that have been, and continue to be, undertaken. A Risk Assessment was finalized and submitted to the Ministry of the Environment, Conservation and Parks for review and issuance of a Certificate of Property Use, which is ongoing.

The Risk Assessment has evaluated the environmental risks of these lands and indicated that with the approved Risk Management Measures, the proposed uses are acceptable. A Record of Site Condition will be filed upon receipt of the MECP Certificate of Property Use.

S2S Environmental prepared a Technical Memorandum, provided as part of this application, which provides a summary of the findings and current status of the Phase Two ESA and Risk Assessment of the property at 200 Exmouth Street. The summary of findings is as follows:

- Based on information gathered and observations made, the Phase One ESA has identified 28 Potentially Contaminating Activities (PCAs) resulting in 28 Areas of Potential Environmental Concern (APECs) within Subject Lands. Each of these APECs are required to be investigated as part of the Phase Two ESA process; therefore, based on the identified APECs from the Phase One ESA, a Phase Two ESA was recommended and

completed at the Subject Lands to assess the quality of the soils and groundwater in accordance with the current applicable O. Reg. 153/04, as amended Standards.

- Primary areas of concern requiring investigations included on-site historical activities i.e., bulk chemical/fuel storage, waste dump and foundry activities, including metal fabrication and asbestos insulation manufacturing. Contaminants of concern were identified as volatile organic compounds (VOC), petroleum hydrocarbons fractions F1-F4 (PHC) and polycyclic aromatic hydrocarbons (PAH).
- Subsurface drilling and excavation activities at Subject Lands have been completed in four stages from February 2022 to March 2023 based on the logistics of Subject Lands and access limitations. These have resulted in a total of approximately 70 drilling locations, including five exploratory excavations of mass concentrations (hot spots) of contaminants with respective lateral and vertical delineation boreholes and groundwater monitoring wells. The analytical soil and groundwater results to-date indicate remaining soil and groundwater contaminant concentrations can be appropriately managed via a Risk Assessment remediation approach to satisfy the MECP RSC requirements.
- Based on analytical results from the Phase Two ESAs, all concentrations of contaminants of concern analyzed in soil and groundwater were below the applicable MECP Table 3 Standards with some exceptions on the west, south-central, and southeast portions of the Subject Lands, including the former Foundry Building, Insulation Building, and Insulation Storage Building footprint in central, east central, and north portions of the Subject Lands, respectively.
- On December 2023, the process for the pre-submission form (PSF2196-23, IDS Ref No. 3717-CYHPYA) for the risk assessment (PSF/RA) under O. Reg 153/04 for the Subject Lands on behalf of MALLEUM Partners was initiated. On March 2024, MECP provided comments and questions on the PSF. Although the baseline data collected is agreed to be representative, the MECP requires further delineation to satisfy the regulation requirements to obtain an RSC. All these concerns are addressable by acquiring more field data, which will represent additional fieldwork for drilling and sampling soil and groundwater and re-submitting the RA.

7.3 Transportation Impact Study

Paradigm Transportation Solutions Ltd. was retained to conduct a Transportation Impact Study (TIS) for the proposed development. The TIS was prepared as part of the Official Plan Amendment application and reflects a high-level review of traffic impacts in the surrounding area.

The TIS includes an analysis of existing traffic conditions; a description of the proposed development; traffic forecasts for build-out date (2029), five years from build-out (2034), and ten years from build-out (2039); and, assessment of traffic impacts with recommendations to accommodate the proposed development as appropriate.

The TIS has a number of conclusions relating to existing traffic conditions; development trip generation; background traffic conditions; total traffic conditions; site access; and, intersection improvements. The TIS generally supports the Official Plan Amendment application, with recommendations as follows:

- Eastbound left-turn lanes with 25 metres of storage be planned at the driveway locations on Exmouth Street. Alternatively, a two-way centre left-turn lane can be considered on Exmouth Street between Front Street North and Christina Street North to account for all driveways in this stretch of Exmouth Street;
- The left-turn lane storage length extensions at the intersections noted in Section 5.2 of the report be considered prior to build-out; and,
- An updated TIS be prepared when the development concept becomes more detailed at the Zoning By-law Amendment and Site Plan Approval application stages, including an assessment of additional intersections as requested by the County of Lambton.

7.4 Servicing Brief

MTE Consultants was retained to provide a preliminary engineering analysis of the proposed development to address the servicing feasibility and servicing options. The servicing brief concludes that there is existing water supply infrastructure, sanitary forcemain, and storm sewers in the vicinity of the site that can be used for servicing. The conclusions are as follows:

- The existing watermain will be analyzed in the detailed design state, and will have to be removed and replaced with a larger size if it cannot satisfy the water supply and fire protection requirements for the subject lands.
- The existing sanitary forcemain connecting the subject lands to the municipal sanitary sewer can not service the ultimate buildout population, and a replacement is recommended. There are several sanitary flow constraints, and the wastewater treatment plant does not have enough reserve capacity for the ultimate buildout of the development. A pumping station will be designed in the detailed design stage.
- Post-development storm flows will be controlled to be lower or match pre-development storm flows. Post-development quantity and quality controls will be provided utilizing best management practices.

As per the above, the majority of the downstream sanitary infrastructure, with the exception of the treatment plant, will require upgrades prior to development proceeding. Infrastructure upgrades will be explored further through the detailed design stage.

8.0 CONCLUSIONS

The proposed Official Plan Amendment seeks to facilitate a high-density mixed-use development consisting of residential uses, office/retail space, a hotel, a campus of care, and a public park on the subject lands. The established County and Village land use policies encourage a development of the nature and scale generally as proposed.

The subject lands are proximate to public services and amenities, as well as existing public transit opportunities. The proposal to redevelop the subject lands appropriately provides efficient and cost-effective mixed-use development in a built-form and intensity that is compatible with abutting land uses and achieves the goal of intensification at a gateway site to the Village, County, and Canada.

Provincial and municipal planning legislation speak to creating complete communities that include housing that can serve a wide variety of demographics and lifestyles and is well-connected by transportation networks. The proposed development will add approximately 1,900 units that will provide a range of housing options. Notably, this proposal will make efficient use of underutilized lands to help address the significant housing shortage being experienced across the province.

Based on the above, and as detailed throughout this Planning Justification Report, the proposed development is consistent with the intent and policies as set forth in provincial and municipal planning legislation. As such, the proposed Official Plan Amendment is considered appropriate and represents good land use planning.