

Planning Justification Report

Staffen Family Holdings Inc.

**769 Queens Street East / St. Marys Golf & Country Club
St. Marys**



August 18, 2022



Zelinka Priamo Ltd.

LAND USE PLANNERS

TABLE OF CONTENTS

	Page No.
1.0 INTRODUCTION	2
2.0 SUBJECT LANDS	3
3.0 SURROUNDING LAND USE CONTEXT	6
4.0 PROPOSED DEVELOPMENT	8
5.0 PROPOSED AMENDMENTS	10
5.1 Official Plan Amendment	10
5.2 Zoning By-law Amendment.....	10
6.0 CURRENT POLICY AND REGULATORY FRAMEWORK	11
6.1 Provincial Policy Statement, 2020	11
6.2 Town of St. Marys Official Plan, 2007	13
6.3 Town of St. Marys Zoning By-law, 2018	16
7.0 ADDITIONAL CONSIDERATIONS	20
7.1 Public Consultation Strategy.....	20
7.2 Technical Studies	20
7.2.1 Tree Inventory and Arborist Report	20
7.2.2 Scoped Transportation Study.....	21
7.2.3 Functional Servicing Report	21
8.0 CONCLUSIONS	22

1.0 INTRODUCTION

Zelinka Priamo Ltd., on behalf of Staffen Family Holdings Inc., is pleased to submit this report in support of an application to the Town of St. Marys to amend the Town of St. Marys Official Plan and Zoning By-law to permit the redevelopment of a southwesterly portion of the lands known municipally as 769 Queen Street East / the St. Marys Golf and Country Club (hereinafter referred to as the “subject lands”) for accessory short-term rental accommodations.

The purpose of this Planning Justification Report is to evaluate the proposed Official Plan and Zoning By-law Amendments within the context of existing land use policies and regulations, including the Provincial Policy Statement, the Town of St. Marys Official Plan, and the Town of St. Marys Zoning By-law.

2.0 SUBJECT LANDS

The subject lands generally consist of the vacant, undeveloped lands in the southwesterly corner of the St. Marys Golf and Country Club property (see Figure 1). The irregularly-shaped lands have an area of approximately 0.7ha with a frontage of approximately 35m along Queen Street East. The subject lands abut the St. Marys Golf and Country Club to the north and east; Queen Street East to the south; and, a hydroelectric facility to the west. Residential, commercial, institutional, and light industrial uses are located opposite the subject lands on the south side of Queen Street East.

The subject lands are currently vacant and undeveloped with a sloped topography generally from west to east, with some peripheral plantings. There is currently no vehicular curb cut serving the subject lands. See Images 1-3 below for imagery of the subject lands.

The vehicular portion of the Queen Street East right-of-way generally consists of three lanes; one in each direction and a centre turning lane. The right-of-way tapers to two lanes heading west towards the subject lands. Pedestrian sidewalks are located on the south side of Queen Street East with a grassed landscaped strip that provides a buffer between the sidewalk and the outermost vehicular lane. A gravel shoulder is located on the north side of Queen Street East which may provide an informal travel route for pedestrians and cyclists. While there are no conventional public transportation options (i.e., city bus) that service the subject lands, the St. Marys VIA Rail station is located approximately 1.3km (an approximate 15-minute walk) from the subject lands. In addition, St. Marys is serviced by PC Connect, a public transit service that provides transportation throughout Perth County, Stratford, St. Marys, Kitchener/Waterloo, and London. The subject lands are serviced by two PC Connect routes: the Perth County South route and the London to Stratford route. The PC Connect stops are located at the St. Marys Town Hall on Queen Street East, approximately 1.5km from the subject lands, and at the St. Marys Memorial Hospital on Queen Street West, approximately 2.6km from the subject lands.

The subject lands are designated “*Recreational*” in the Town of St. Marys Official Plan; and, are zoned “*Open Space*” in the Town of St. Marys Zoning By-law. The proposed development is located outside of the Upper Thames River Conservation Authority (UTRCA) regulated area.



Project No.: SFN/STM/21-01

Date: August 18, 2022

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
TEL (519) 474-7137 Email: zp@zpplan.com

FIGURE 1 - LOCATION

image retrieved from UTRCA mapping

SMGCC SHORT-TERM RENTAL UNITS

STAFFEN FAMILY HOLDINGS INC.

769 QUEEN STREET EAST

PT. LOT 17, CONCESSION 19

GEO. TOWNSHIP OF BLANSHARD

TOWN OF ST. MARYS

Image 1 – Subject Lands (looking east towards the St. Marys Golf and Country Club)



Image 2 – Subject Lands (looking west towards the hydroelectric facility lands)



Image 3 – Subject Lands (panoramic view)



3.0 SURROUNDING LAND USE CONTEXT

The subject lands are generally surrounded by commercial and industrial 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.

The existing streetscape along this portion of Queen Street East primarily consists of a variety of uses, including commercial and industrial uses in the form of restaurants, retail stores, and automobile uses, typically with buildings set back from the Queen Street East right-of-way with surface parking lots situated in front of the buildings. Residential uses are located opposite the subject lands on the south side of Queen Street East primarily consisting of single detached dwellings and townhouses. The subject lands, and greater surrounding area, are not serviced by public transit.

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

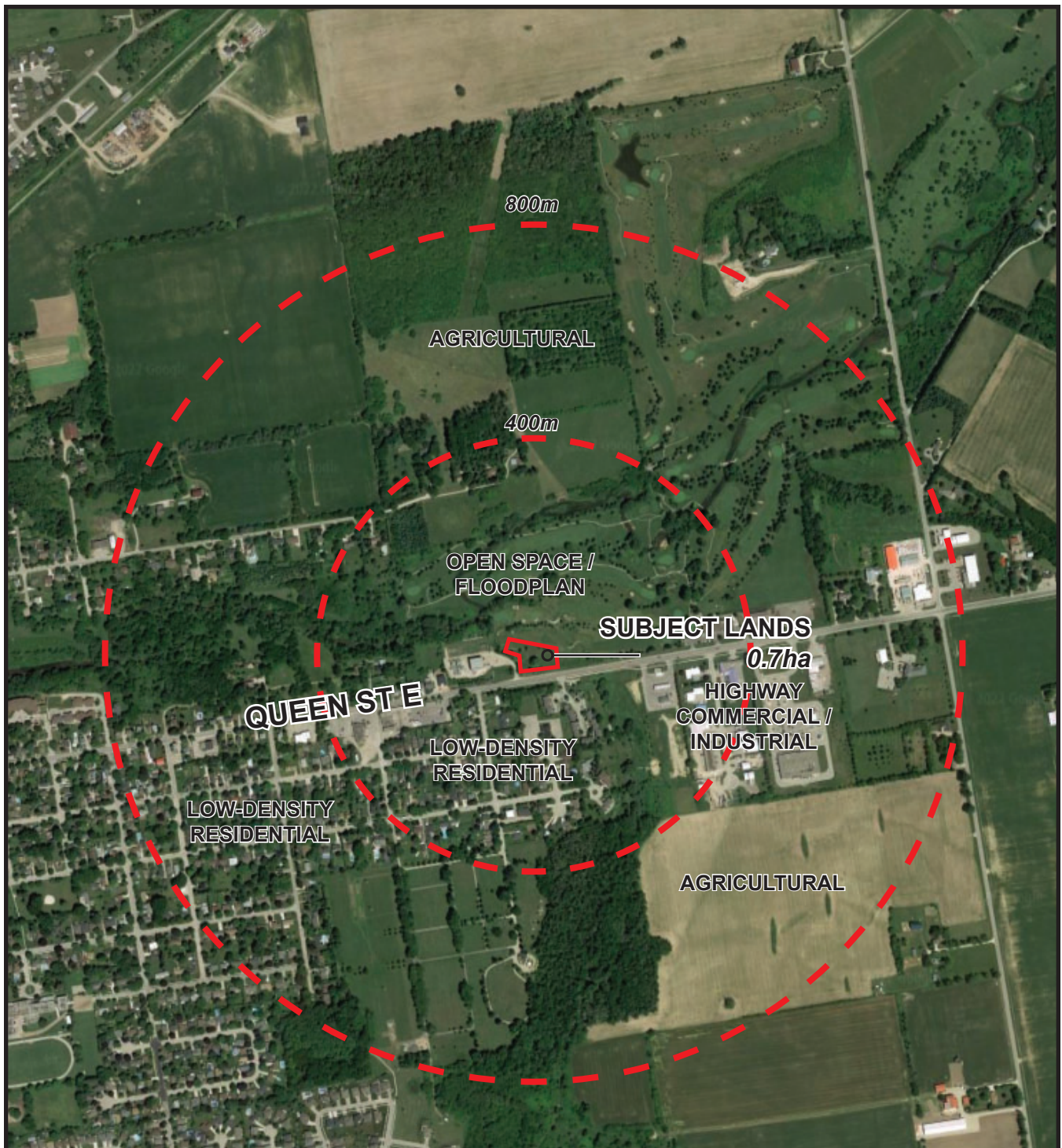
North: St. Marys Golf and Country Club lands are adjacent to the subject lands to the north, comprised of the golf course operation. Beyond these lands are agricultural land uses with single detached dwellings.

East: The St. Marys Golf and Country Club lands are adjacent to the subject lands to the east. These lands are comprised of the golf course operation and the club house/restaurant and wedding reception operations.

South: Institutional and residential land uses are located south of the subject lands. The Grace Community Church is directly opposite the subject lands on the south side of Queen Street East. East of the church, also opposite the subject lands, is a residential townhouse development. These townhouses are generally oriented away from Queen Street East and are generally shielded from view from the existing tree line. The townhouses are 2- to 3-storeys in height with a single driveway from Queen Street East and surface parking. Further south, and west, of the church consists of residential uses primarily consisting of single detached dwellings 1- to 2-storeys in height. Vehicular access is via driveways located in the front yard, and vehicular parking is a mix of surface parking, detached garages, and attached garages. The exterior finishes of these dwellings are typically brick/masonry with vinyl siding and a mix of window styles and treatments.

West: Industrial, commercial, and residential uses are located west of the subject lands. A hydroelectric facility is adjacent to the subject lands to the west, but is generally shielded from view from the existing mature tree line. Commercial uses west of the subject lands include a variety of low-rise commercial establishments, such as retail shopping centres and restaurants, and their associated parking lots. Residential uses to the west are similar to those located south of the subject lands.

Lands within an 800m, 10-minute walk radius are similar to those described above but also include agricultural areas located north of the subject lands, adjacent to and beyond the golf course lands.



Project No.: SFN/STM/21-01

Date: August 18, 2022

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
 TEL (519) 474-7137 Email: zp@zpplan.com

FIGURE 2 - SURROUNDING CONTEXT

image retrieved from Google Earth

SMGCC SHORT-TERM RENTAL UNITS

STAFFEN FAMILY HOLDINGS INC.

769 QUEEN STREET EAST

PT. LOT 17, CONCESSION 19

GEO. TOWNSHIP OF BLANSHARD

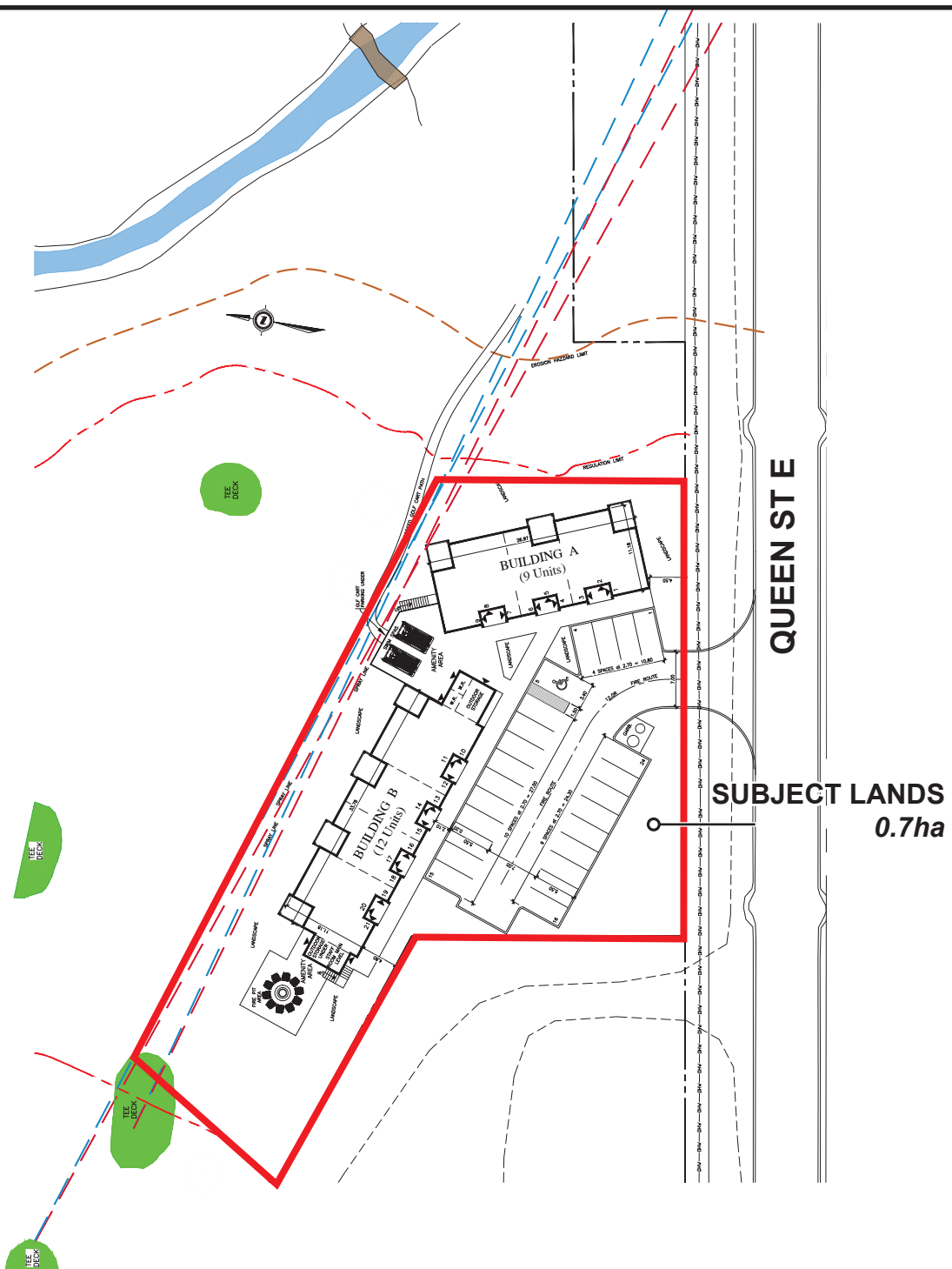
TOWN OF ST. MARYS

4.0 PROPOSED DEVELOPMENT

The redevelopment of the subject lands proposes two, 2-storey (3 level) buildings, with Building A (closest to Queen Street East) consisting of 9 short-term rental units and Building B consisting of 12 short-term rental units, with a total of 21 short-term rental units (see the preliminary Concept Plan in Figure 3). The short-term rental units will operate in association with the St. Marys Golf and Country Club (SMGCC).

Buildings A and B are proposed to be designed in the style of residential stacked townhomes with a mix of unit sizes and types, including one-bedroom and two-bedroom units. The buildings are proposed to be oriented to provide outlook over the golf course lands. Vehicular access to the proposed development is to be provided by a new driveway from Queen Street East. On-site surface parking is proposed at a rate of approximately 1.14 spaces per unit, with a total of 24 parking spaces. A golf cart path is proposed within the golf course lands connecting the proposed accommodations to/from the main SMGCC clubhouse/reception building. Private outdoor amenity space is proposed for each unit, in the form of ground-floor patios or balconies. Common outdoor amenity space is proposed in two areas and include features such as a fire pit area and swim spas.

While the buildings will comprise of 3 levels, given the slope of the application lands, the buildings will present as 2-storeys when viewed from Queen Street East. The proposed development presents a built-form that is complimentary to, and compatible with, the residential townhouse development opposite the subject lands on the south side of Queen Street East.



Project No.: SFN/STM/21-01

Date: August 18, 2022

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
 TEL (519) 474-7137 Email: zp@zpplan.com

FIGURE 3 - CONCEPT PLAN

provided by Orchard Designs

SMGCC SHORT-TERM RENTAL UNITS

STAFFEN FAMILY HOLDINGS INC.

769 QUEEN STREET EAST

PT. LOT 17, CONCESSION 19

GEO. TOWNSHIP OF BLANSHARD

TOWN OF ST. MARYS

5.0 PROPOSED AMENDMENTS

In order to permit the proposed development, an Official Plan Amendment (“OPA”) and a Zoning By-law Amendment (“ZBA”) are required.

5.1 Official Plan Amendment

The subject lands are designated “*Recreational*” in the Town of St. Marys Official Plan. The OPA proposes to implement a site-specific policy to the “*Recreational*” land use designation to permit the short-term rental accommodation use on the subject lands.

5.2 Zoning By-law Amendment

The subject lands are zoned “*Open Space (OS)*” in the Town of St. Marys Zoning By-law. The ZBA proposes to rezone the subject lands to a site-specific “*Open Space (OS-(_))*” zone with a special regulation to permit accessory short-term rental accommodation in association with the existing golf course, restaurant, and wedding venue operations. At this preliminary stage, site-specific provisions would include the following:

- Add short-term rental accommodations as a permitted use; and,
- A minimum front yard setback of 4.5m; whereas a 6.0m is permitted.

6.0 CURRENT POLICY AND REGULATORY FRAMEWORK

The following section provides analysis on the proposed development and planning applications with respect to applicable policy and regulatory documents.

6.1 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 and Zoning By-law 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>Section 1.1.1 Managing and Directing Land Use [...] Healthy, liveable and safe communities are sustained by:</p> <ul style="list-style-type: none"> a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term. 	<p>The proposed development is an efficient and appropriate form of development for the subject lands, and will add to the range of land uses in the immediate and surrounding areas. The subject lands are an undeveloped portion of a greater parcel of land that will utilize existing municipal services within an existing built-up area. Thus, the consumption of land and servicing costs are minimized.</p>
<p>Section 1.1.3.1 Settlement Areas 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 Town of St. Marys.</p>
<p>Section 1.1.3.2 Settlement Areas 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. 	<p>The proposed development broadens the range of land uses in the immediate area, and compliments the range of intensities of mixed forms in the greater surrounding area. The proposed development makes efficient use of underutilized land, resources, infrastructure, and existing transportation networks. There is sufficient infrastructure capacity to adequately service the subject lands through full municipal services as confirmed by the submitted servicing report. Development of the subject lands, being an unutilized portion of the SMGCC lands, avoids the need for further expansion.</p>
<p>Section 1.1.3.4 Settlement Areas 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>The proposed development will utilize zoning regulations that are appropriate for this type of development and is generally in conformity with provisions set forth within the Town of St. Marys Zoning By-law. The ZBA seeks site-specific, special regulations to permit the proposed short-term rental accommodation use on the subject lands; and, to permit a reduced front yard setback to keep the development outside of the floodplain area. There are no anticipated risks to public health and safety from the proposed development.</p>

<p><u>Section 1.1.3.6 Settlement Areas</u> 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 efficient use of land, infrastructure and public service facilities.</p>	<p>The proposed development is within an existing built-up area. The proposed building design of the short-term rental units in the style of stacked townhomes is reflective of a compact and efficient form of development which adds to the range of uses in the area and</p>
<p><u>Section 1.6.6.2 Sewage, Water and Stormwater</u> 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 as there is sufficient capacity to support the development as demonstrated by the <i>Functional Servicing Report</i> provided by GRIT Engineering.</p>
<p><u>Section 1.7.1 Long-Term Economic Prosperity</u> Long-term economic prosperity should be supported by:</p> <ul style="list-style-type: none"> a) promoting opportunities for economic development and community investment-readiness; c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities; h) providing opportunities for sustainable tourism development. 	<p>The Town of St. Marys is experiencing a growing demand for short-term rental accommodations to support established business operations and capitalize on the Town's cultural heritage. The proposed development provides an opportunity for the SMGCC, and other local businesses, to create an experience for tourists that extends to overnight stays and promotes tourism throughout all seasons.</p> <p>The proposed development seeks to address the lack of short-term accommodations within the Town and utilizes existing undeveloped land, full municipal services, and proximate public service facilities to encourage tourism and support economic prosperity.</p>

6.2 Town of St. Marys Official Plan, 2007

The Town of St. Marys Official Plan is a policy document providing a long-range, comprehensive land use strategy for areas located within the municipal boundaries of the Town. It provides the framework for land use decisions for all development within the Town of St. Mary's by protecting and enhancing the natural environment, and directing and managing growth patterns and facilitating visions of the Town. The Official Plan also provides an avenue through which Provincial policies are implemented in the local context.

The subject lands are designated "*Recreational*" according to "Schedule 'A' – Land Use Plan" of the Town of St. Marys Official Plan (Figure 4). The following table contains a policy analysis detailing how the proposed development conforms with the Plan:

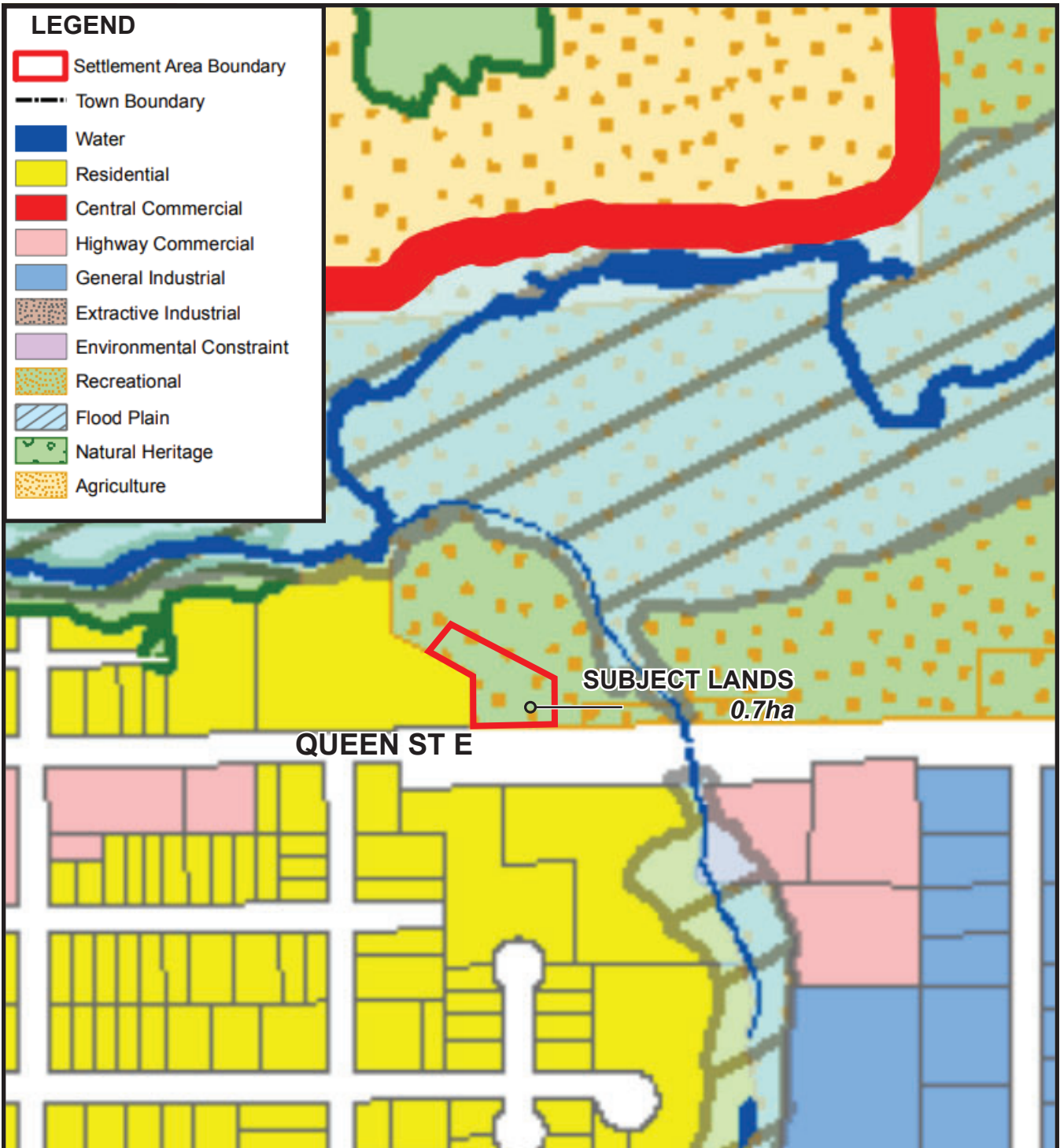
Town of St. Marys Official Plan (2007) Policy Analysis Table	
<i>Policy</i>	<i>Response</i>
<p><u>Section 2.2.1 Economic Development Objectives</u></p> <ol style="list-style-type: none"> 1. To encourage the retention of existing business and the establishment of new diversified business through the creation of a business-friendly culture. 2. To advocate local business development for the general benefit of the community. 3. To be proactive in attracting new business opportunities to the Town. 4. To develop a plan to attract tourism and capitalize on the Town's cultural heritage. 	<p>There is an established need in the Town to encourage tourism and contribute to the success of local businesses in St. Marys, including the SMGCC. There is currently a shortage of available short-term rental accommodations in St. Marys, made worse with the closure of the Stone Willow Inn which resulted in the Town losing approximately 53% of available hotel rooms, which this proposal is intended to help address.</p> <p>The SMGCC has established a flourishing business operation which has created extensive demand for short-term accommodations through the growing success of its wedding, restaurant, and golf business. In 2022, SMGCC is hosting 100 weddings with 98% of them being attended by out-of-Town clients and guests. This business on its own brings an average of 13,000 captive travellers to St. Marys throughout the year, not including the 30,000+ rounds of golf and thousands of restaurant guests. However, due to the lack of short-term accommodations, guests are required to find accommodations elsewhere, such as Stratford or London, and therefore spend less time in the Town and spend tourism dollars elsewhere.</p> <p>The proposed development may be considered part of a larger Town strategy to attract tourism to St. Marys and further support local business endeavours.</p>
<p><u>Section 3.7.1 Recreational Objectives</u></p> <ol style="list-style-type: none"> 1. To promote a healthy, active community by providing a range of recreational activities. 2. To recognize and promote existing recreational facilities and the establishment of new facilities. 5. To recognize the Town's "Recreational" areas as an instrument to promote economic development, tourism, and education and awareness programmes. 	<p>The proposed development aims to create a well-rounded experience for guests of the SMGCC that extends to overnight stays and promotes tourism within the Town throughout all seasons.</p>

<p><u>Section 3.7.2.6 Recreational Policies</u> Land which is designated in this Plan as “Recreational” that is in private ownership will not necessarily remain as “Recreational” indefinitely. If proposals to develop any such lands are made and the Town does not wish to purchase the land in order to maintain it as “Recreational”, then an application for the redesignation of such land for other purposes will be given due consideration by Council. Any proposal or application for redevelopment shall conform with the policies and intent of this Plan.</p>	<p>The proposed Official Plan Amendment does not seek to change the land use designation or remove land use permissions from the subject lands, but rather expand the range of permitted uses to make efficient use of the lands and achieve the full potential of the planned function of the lands.</p>
<p><u>Section 5.3.9 Transportation & Services</u> Access driveways should not create traffic hazards. The driveways should be limited in number and designed to minimize dangers to pedestrians and vehicles. Council may regulate the number of driveway access as a function of the road classification.</p>	<p>The <i>Scoped Transportation Study</i> prepared by Paradigm, and discussed later in this report, evaluated the impacts of available sight distance to/from the subject lands’ driveway to Queen Street East and concluded that sight distances should not be a concern for the proposed driveway location. Thus, the proposed driveway is not anticipated to pose a danger to pedestrians and/or vehicles.</p>
<p><u>Section 5.5.1 Water Supply</u> No development will be approved which cannot be adequately serviced from the Town’s municipal water supply system unless specifically identified as being permitted with on-site services.</p>	<p>The <i>Functional Servicing Report</i> prepared by GRIT Engineering, as discussed later in this report, confirms the proposed development can be adequately serviced by the Town’s municipal water supply systems.</p>
<p><u>Section 5.6.2 Sanitary Sewage Disposal</u> No development will be approved by the Municipality unless sufficient treatment capacity exists to accommodate the development. In this regard, the municipality may require that a report, prepared by a qualified engineer, be submitted projecting the sewage effluent which will be generated by the proposed development except where development is approved by the appropriate authority for on-site sewage disposal facilities in specific circumstances as otherwise set out in this Plan.</p>	<p>The <i>Functional Servicing Report</i> prepared by GRIT Engineering, as discussed later in this report, confirms the proposed development can be adequately serviced by the Town’s existing sewage treatment capacity.</p>

The proposed development represents an appropriate and compatible form of development at an appropriate location and is generally in conformity with the policies and intent of the Town of St. Marys Official Plan. The proposed development is consistent with the planned function of the “Recreational” land use designation to promote economic development and tourism.

LEGEND

-  Settlement Area Boundary
-  Town Boundary
-  Water
-  Residential
-  Central Commercial
-  Highway Commercial
-  General Industrial
-  Extractive Industrial
-  Environmental Constraint
-  Recreational
-  Flood Plain
-  Natural Heritage
-  Agriculture



Project No.: SFN/STM/21-01

Date: August 18, 2022

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
 TEL (519) 474-7137 Email: zp@zpplan.com

**FIGURE 4 - TOWN OF ST. MARYS OFFICIAL PLAN
 SCHEDULE 'A' - LAND USE PLAN**

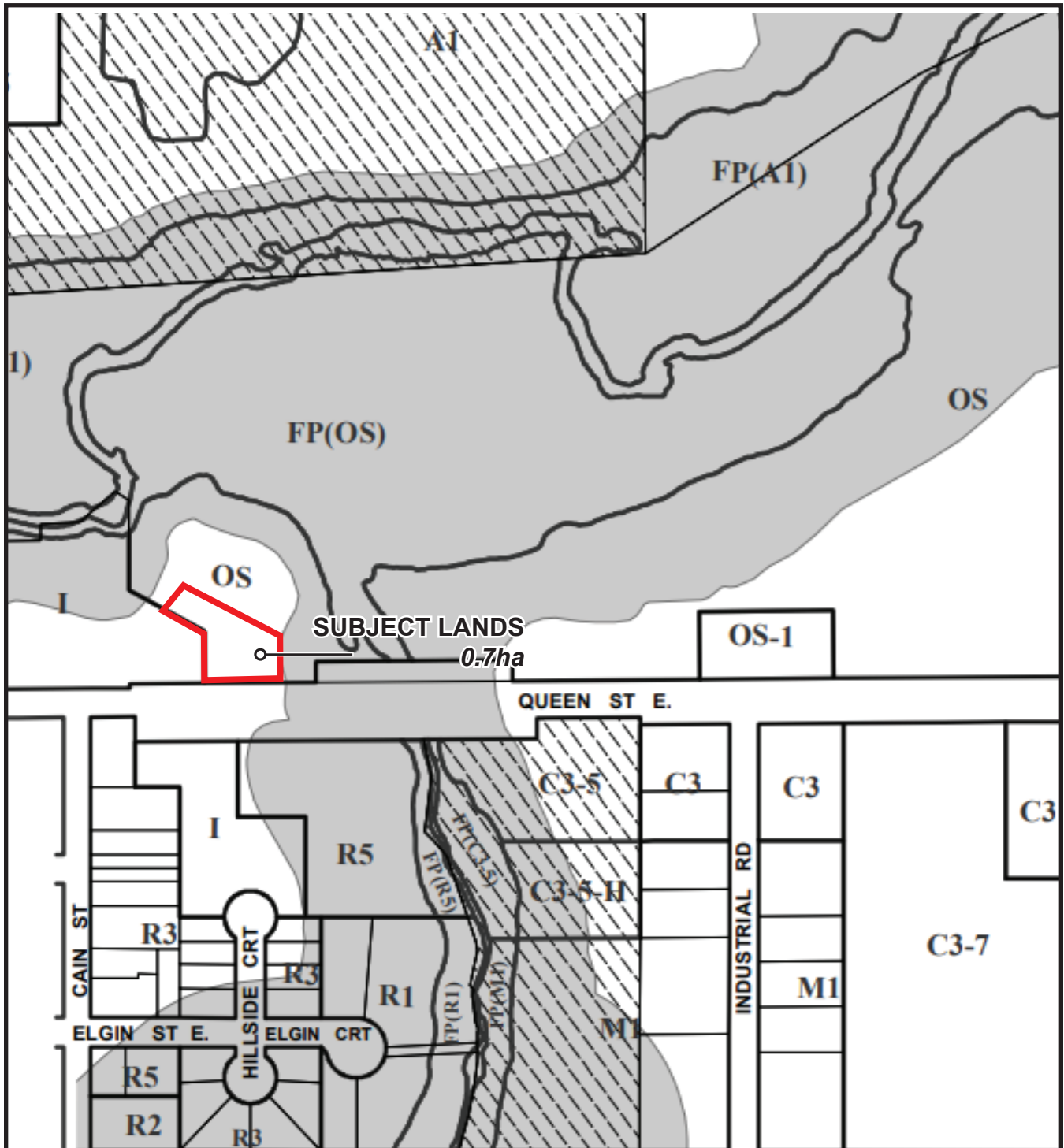
SMGCC SHORT-TERM RENTAL UNITS
STAFFEN FAMILY HOLDINGS INC.
 769 QUEEN STREET EAST
 PT. LOT 17, CONCESSION 19
 GEO. TOWNSHIP OF BLANSHARD
 TOWN OF ST. MARYS

6.3 Town of St. Marys Zoning By-law, 2018

The subject lands are zoned “*Open Space (OS)*” in the Town of St. Marys Zoning By-law (Figure 5) which permits cemetery; dog park; golf course; hiking trail; multi-use pathway; passive recreational; public park; sports field; baseball diamond; swimming pool; and, tennis court uses as well as accessory uses, buildings, and structures. An accessory use, as per the Zoning By-law, is a use that is normally incidental, subordinate, and exclusively devoted to the main use of the lot and which is located on the same lot therewith.

The proposed Zoning By-law Amendment seeks to rezone the subject lands to a site-specific “*Open Space (OS-(□))*” zone, to permit the short-term rental units as an accessory use to the greater operations of the SMGCC. The subject lands are an unutilized portion of land part of the greater SMGCC lands. The proposed short-term rental units are intended to support the golf course, restaurant, and wedding venue business operations of the SMGCC by providing guests and tourists with accommodations to encourage overnight stays. Thus, the proposed development is considered an accessory use to the main permitted use, being the golf course, and is appropriate for the subject lands.

The subject lands are unique in that they are some of the only lands on the greater St. Marys Golf and Country Club property that are vacant, undeveloped, and not actively used for any part of the golf course or golf course maintenance areas, restaurant, wedding reception operations, or parking areas. The subject lands have adequate frontage on Queen Street East to service the proposed development. Additionally, the subject lands are located outside of the *Floodplain (FP)* zone that spans a large portion of the SMGCC property. As such, the subject lands are a contextually appropriate location for the proposed development in regards to the greater SMGCC property.



Project No.: SFN/STM/21-01

Date: August 18, 2022

Scale: NTS



318 Wellington Road, London, ON, N6C 4P4
 TEL (519) 474-7137 Email: zp@zpplan.com

FIGURE 5 - TOWN OF ST. MARYS ZONING BY-LAW
 SCHEDULE 'A' - KEY MAP 10

SMGCC SHORT-TERM RENTAL UNITS
 STAFFEN FAMILY HOLDINGS INC.
 769 QUEEN STREET EAST
 PT. LOT 17, CONCESSION 19
 GEO. TOWNSHIP OF BLANSHARD
 TOWN OF ST. MARYS

On a preliminary basis, and to be further refined through the application review process, Table 1 below provides a breakdown of the regulations for the “OS” zone as well as a comparison to the built form regulations exhibited in the Concept Plan:

Table 1 – Zoning Table

SITE DATA:		
ZONE:	OPEN SPACE (OS)	
PROPOSED USE:	ACCESSORY USE (SHORT-TERM RENTAL ACCOMMODATIONS)	
	REQUIRED	PROPOSED
LOT AREA (MIN.)	540.00m ²	576,101m ²
LOT FRONTAGE (MIN.)	18.0m	608.0m
LOT DEPTH (MIN.)	30.0m	>30.0m
FRONT YARD – QUEEN ST E (MIN.)	6.0m	4.5m*
INTERIOR SIDE YARD - E (MIN.)	4.5m	21.32m
INTERIOR SIDE YARD - W (MIN.)	4.5m	4.8m
EXTERIOR SIDE YARD (MIN.)	6.0m	N/A
REAR YARD (MIN.)	7.5m	>7.5m
BUILDING HEIGHT (MAX.)	10.5m	10.5m
LOT COVERAGE (MAX.)	40.0%	<40.0%
LANDSCAPED OPEN SPACE (MIN.)	20.0%	>20.0%
PARKING	21 spaces (1 / unit)	24 spaces
NOTES: <ul style="list-style-type: none"> • *Denotes required special provision. • Required parking rate based on “accessory dwelling” parking rate requirement in the Town of St. Marys Zoning By-law. 		

The Town of St. Marys Zoning By-law does not currently have a definition for “short-term rental accommodation”. As such, the proposed definition is as follows:

SHORT-TERM RENTAL ACCOMMODATION means an entire dwelling unit that is used for any period of less than 28 consecutive days and is operated by the owner or occupier. Short-term rental accommodation shall not include a hotel, motel, dwelling apartment, dwelling boarding or lodging house, or similar commercial or institutional use. The principal use of the dwelling unit shall be for residential purposes and the short-term rental accommodation shall be an ancillary use to the main golf course permitted use.

The proposed development is generally in conformity with the *Open Space* regulations, with the exception of the front yard setback. The proposed development provides a 4.5m front yard setback, where the existing regulations permit a 6.0m front yard setback. The reduced front yard

setback will keep the development outside of the *Floodplain (FP)* zone, and as such, is appropriate for the subject lands.

The requested “*Open Space (OS-())*” zone is intended to permit the redevelopment of the subject lands in a manner that is appropriate for the lands and compatible with abutting uses. The proposed special provision to permit short-term rental units as an accessory use is consistent with the goals of economic development detailed in the Town of St. Marys Official Plan and is generally in conformity with the Town of St. Marys Zoning By-law.

7.0 ADDITIONAL CONSIDERATIONS

7.1 Public Consultation Strategy

It is proposed that the public consultation process for the proposed applications 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 applications.

7.2 Technical Studies

The proposed development is supported by the following technical reports.

7.2.1 Tree Inventory and Arborist Report

Ron Koudys Landscape Architects Inc. (RKLA) was retained by Staffen Family Holdings Inc. to prepare a tree assessment report and tree preservation plan for the proposed development. The intent of the report was to summarize the findings of the tree assessment and make recommendations regarding tree preservation and removal based on tree health and expected construction impacts. The tree removal and preservation requirements include the following:

- Remove 12 trees from subject lands due to conflict with proposed construction;
- Remove 2 trees from the adjacent hydro utility facility, following proper consent procedures, due to conflict with proposed construction and/or poor tree condition;
- Preserve 19 tree located on the subject lands and adjacent private property;
- Install and maintain tree preservation fencing as per the tree preservation drawing and details; and,
- Following the pre, during, and post construction impact mitigation recommendations discussed in the report.

7.2.2 Scoped Transportation Study

Paradigm Transportation Solutions Limited (Paradigm) was retained by Staffen Family Holdings Inc. to conduct a transportation study in support of the proposed development. As confirmed by Town staff, the purpose of the report was to identify and assess the subject lands proposed driveway connection to Queen Street East to ensure compliance with review agency requirement and applicable industry guidelines. The study evaluated the impacts of available sight distance to/from the subject lands' driveway to Queen Street East. The conclusions of the study include the following:

- Field measurements indicate that the Transportation Association of Canada (TAC) minimum stopping sight distance and intersection sight distances will be met; and,
- Sight distances should not be a concern for the proposed driveway location.

7.2.3 Functional Servicing Report

GRIT Engineering Inc. (GRIT) was retained by Staffen Family Holdings Inc. to complete a Functional Servicing Report (FSR) in support of the proposed development. The main findings of the FSR include the following:

- The proposed development may be adequately serviced through available municipal water, local utilities, and existing gravity sanitary sewers;
- The proposed development is expected to utilize the existing 200mm diameter sanitary main on Queen Street East;
- The proposed development is expected to be serviced by a proposed 150mm diameter water service connecting into the existing watermain on Queen Street East. A valve is to be installed at the property line for maintenance and repair;
- The subject lands are not expected to require a private storm drainage connection to the existing Town of St. Marys storm infrastructure and are expected to discharge to existing grade towards Trout Creek, requiring quantity and quality control; and,
- Overall site grading will provide for major overland flow towards Trout Creek, provide adequate cover over municipal services, and generally match existing road and boundary grades with appropriate slopes.

8.0 CONCLUSIONS

The proposed Official Plan and Zoning By-law Amendments seek to permit two, 2-storey (3 level) short-term rental buildings on the subject lands. The subject lands are proximate to recreational and open space areas and are located along an existing county road. The proposal to redevelop the subject lands to appropriately provide efficient and cost-effective short-term rental accommodation development provides a built-form that is compatible with abutting uses and achieves the goal of economic development.

Provincial and municipal land use planning policies speak to supporting long-term economic prosperity that advocates for local business development and provides opportunities for tourism development. The intent of the SMGCC's 21 short-term rental units is to help alleviate a shortage of short-term accommodations in the area and meet the growing demand for vacation and short-term rental accommodations in St. Marys, as well as provide a comprehensive tourist experience to attract visitors to the Town.

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 amendments are considered appropriate and represent good land use planning.