



April 27, 2026

Marc Davidson, Manager of Planning
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Delivered via email: marc.davidson@thorold.ca

Dear Mr. Davidson,

**Re: *Planning and Urban Design Addendum Letter
Zoning By-law Amendment and Draft Plan of Subdivision
(File No. D14-01-2024)
Upper's Lane Subdivision – Rolling Meadows Secondary Plan Area***

Bousfields Inc. is the planning consultant to QuadReal Property Group (authorized agent of Parkbridge Lifestyle Communities Inc. and 1000352619 Ontario Ltd., herein identified as “**QuadReal**”), the owner of a 39.8-hectare (98 acres) site within the Rolling Meadows Secondary Plan, legally described as Part of Township Lots 43, 44, 66 and 67 in the City of Thorold (the “**subject site**” or “**site**”). The subject site is located north of the future extension of Upper's Lane, east of Barker Parkway, west of Thorold Townline Road and south of the hydro corridor in the Rolling Meadows neighbourhood.

This Planning and Urban Design Rationale Addendum letter has been prepared in support a response to comments received in the initial submission of the Zoning By-law Amendment (“**ZBA**”) and Draft Plan of Subdivision (“**DPOS**”) applications (together, the “**applications**”) submitted by QuadReal for the above-noted site. This letter summarizes the history of the applications, describes the revised proposal, including information on changes to the relevant policy framework since the original applications were submitted, provides information on the emerging development context, and offers our analysis of the revised proposal.

In our opinion, the revised proposal is consistent with the policies of the Provincial Planning Statement, conforms with the Region of Niagara Official Plan, the City of Thorold Official Plan and the Neighbourhoods of the Rolling Meadows Secondary Plan, and represents good planning. Subject to additional comments set out in this letter, the findings and analysis set out in our Planning and Urban Design Rationale Report dated February 2024 (the “**February 2024 Rationale**”) continue to be relevant and applicable to the revised proposal. It is our opinion that the proposal continues to be appropriate and

desirable for the subject site, and we recommend approval of the proposed ZBA and DPOS applications.

1.0 APPLICATION HISTORY

On behalf of our client, in February 2024, the original applications were submitted by Bousfields. At that time, the proposal was to permit the development of approximately 603 single detached and townhouse dwellings, a 1.4-hectare public park block, an 11-hectare protected natural heritage area, a pipeline corridor block, and three new public streets (the “**original proposal**”). Of note, the original proposal did not include a stormwater management (“**SWM**”) facility on the subject site because the Rolling Meadows Plan of Subdivision and the comprehensive SWM approach anticipated a shared approach to stormwater management that included a pond to benefit multiple landowners on lands located to the west of the subject site. This original proposal provided a combination of lots and larger blocks that would accommodate residential units with a mix of tenures including land lease, condominium, and/or rental tenure. The design and layout of the large residential blocks would be established through future site plan control applications. The original proposal included lots for 17 single detached dwellings and 70 townhouse freehold units. In support of the original applications, Bousfields had prepared the February 2024 Rationale.

The applications were deemed complete on March 13, 2024. Comments on the original proposal were received from City Staff, Regional Staff, and commenting agencies between April to August 2024. A statutory public meeting was held on May 7, 2024.

On July 11, 2023, City Council adopted and approved an Official Plan Amendment, Zoning By-law Amendment and modified Draft Plan of Subdivision for the lands to the west of the subject site, specifically Phases 17-21 and Block 1239 of the Rolling Meadows Subdivision (the “**RMLDC lands**”). Per the Secondary Plan, a SWM facility was planned on the RMLDC lands with sufficient capacity to accommodate stormwater from the RMLDC lands and the broader area, including the QuadReal lands. However, as part of the modifications to the Rolling Meadows subdivision plan, the stormwater management block which was approved to service both QuadReal and the Rolling Meadows Subdivisions, was decreased in size and would no longer capture the stormwater from QuadReal’s site. Instead, a portion of the originally approved pond was replaced with additional residential lots. As noted, this change was a departure from the established stormwater strategy from the Rolling Meadows Secondary Plan area. On February 24, 2026, Council approved the proposed Official Plan Amendment, Zoning By-law Amendment and Draft Plan Approval for the RMLDC lands, which included the reduced stormwater management block.

As a result of the elimination of the consolidated SWM block on the RMLDC lands, the QuadReal Draft Plan of Subdivision needs to be updated, with revisions made to supporting plans and materials in order to accommodate stormwater management facilities on the QuadReal lands in support of the applications.

2.0 DESCRIPTION OF THE REVISED PROPOSAL

The revised proposal continues to be an extension to the existing and planned community to the west and south of the subject site. In this regard, the proposal continues a development pattern that achieves the goals and objectives of the Rolling Meadows Secondary Plan. Like the original submission, the revised proposal provides for residential and community uses in two areas on the subject site (a north section and south section) separated by natural heritage features to be retained in the middle of the site.

The revised Draft Plan of Subdivision included with the resubmission is attached to this letter as **Attachment 1**. A revised demonstration plan illustrating how the community could ultimately be developed and how the network of streets and residential uses will function has also been provided (see **Attachment 2**) to demonstrate how the large blocks could be laid out through future site plan applications.

The following describes the notable changes to the plan:

- A stormwater management block (Block 42) has been incorporated into the revised Draft Plan of Subdivision. Due to the elimination of an approved stormwater management block (Storm D – previously identified as Block 1274) on lands immediately west of the subject site (RMLDC lands, File No. D12-04-2022). The subject site is required to provide a stormwater management block as the proposed subdivision can no longer rely on the stormwater management pond previously planned for the RMLDC lands to capture the stormwater needs for the proposed development on the QuadReal lands. Therefore, a 2.352-hectare stormwater management pond is proposed. The stormwater management pond will also provide the necessary stormwater needs for the Uppers Grove approved Draft Plan of Subdivision (File No. D12-01-2019), immediate southwest of the subject site and owned by QuadReal.
- The original proposal has been revised to provide a mid-rise block (Block 41) on the revised Draft Plan of Subdivision. The mid-rise block will have frontage along Uppers Lane providing opportunities for an apartment-built form having a maximum height of 10-storeys. The mid-rise block is estimated to provide approximately 203-212 units. The final unit count and configuration of the block will be determined through a future site plan application.

- The original proposal proposed a total of 603 units. Due to the revisions of the plan to accommodate the stormwater management block and the addition of the mid-rise block, the revised plan provides for 728 units. This results in an increase of a total of 125 units.
- An emergency access easement has been illustrated on the demonstration plan along Street L. The purpose of this future easement is to provide additional connections to Street A and Street B as requested through City Engineering comments.
- In two of the residential development blocks (Block 34 and Block 38), a stormwater drainage easement has been provided to account for overland flow and has been illustrated on the demonstration plan.

1.1 Summary of Changes

The tables below compare the proposed lots and blocks to be secured in the Draft Plan of Subdivision between the original proposal and revised proposal (refer to **Table 1** and **Table 2**).

Table 1 – Key Statistics of the Draft Plan of Subdivision

Land Use	Original Proposal (February 2024)		Revised Proposal (April 2026)	
	Area (ha)	%	Area (ha)	%
Residential Singles	0.832	2.09%	0.807	2.03%
Townhouses	1.992	5.00%	2.047	5.14%
Residential Development Blocks	22.181	55.67%	18.434	46.27%
Park	1.400	3.51%	1.400	3.51%
Natural Heritage Area	11.048	27.73%	10.634	26.69%
Pipeline	0.208	0.52%	0.622	1.56%
Temporary Turnaround	0.083	0.21%	0.083	0.21%
Roads	2.098	5.27%	2.088	5.24%
Mid-Rise Block	-	-	1.375	3.45%
SWM Pond	-	-	2.352	5.90%
Total	39.842	100%	39.842	100%

Table 2 – Comparison of Units in Demonstration Plan

Unit Type	Original Proposal (February 2024)		Revised Proposal (April 2026)	
	Freehold	Within Dev.	Freehold	Within Dev.
North Section				
Single Detached Units	10	167	10	154
Townhouse Units	27	214	18	192
Bungalow (1-storey)	23	61	15	35
Street (2-storey)	4	153	3	157

Unit Type	Original Proposal (February 2024)		Revised Proposal (April 2026)	
SUBTOTAL	37	381	28	346
South Section	Freehold	Within Dev.	Freehold	Within Dev.
Single Detached Units	7	2	7	5
Townhouse Units	43	133	59	71
Bungalow (1-storey)	-	127	-	6
Street (2-storey)	43	6	59	65
SUBTOTAL	50	135	66	76
Estimated Mid-rise Units	-	-	-	203-212
TOTAL	603 units		719-728 units	

1.2 Required Approvals

In our opinion, the revised proposal continues to conform to the Niagara Region Official Plan, the City of Thorold Official Plan and the Rolling Meadows Secondary Plan. Applications for a Zoning By-law Amendment and Draft Plan of Subdivision are required to implement the proposal.

A Zoning By-law Amendment application is required to introduce appropriate zoning categories and development standards for the lots and blocks within the proposed Draft Plan of Subdivision. A revised draft Zoning By-law Amendment has been provided with the resubmission. This includes amending Zoning By-law No. 60 (2019) to introduce lots and blocks into the Residential One Zones (R1D), Residential Three Zones (R3D), and Residential Four Zones (R4B), subject to site-specific development standards, in addition to the Environmental Protection 2 (EP2), Open Space – Parks and Recreation (OS1) and Utility (U) zones.

The Draft Plan of Subdivision is required to establish the proposed residential lots and blocks, park block, natural heritage area blocks, pipeline corridor block, as well as the proposed public street network.

Future site plan applications will be required to develop the proposed residential blocks, as necessary.

2.0 EVOLVING POLICY AND REGULATORY FRAMEWORK

2.1 Overview

The policy and regulatory context as described in our February 2024 Rationale continues to apply, however, there have been updates to the policy and regulatory framework since that time including an increased emphasis on the provision of housing.

The February 2024 Rationale addressed the Provincial Policy Statement 2020, the Proposed Provincial Planning Statement (October 2023 Draft), the Growth Plan for the Greater Golden Horseshoe (2019), Ministry of Environment Guideline D-6 Compatibility, Niagara Region Official Plan (2022), City of Thorold Official Plan (2016), the Neighbourhoods of Rolling Meadows Secondary Plan (2007), the applicable Urban Design Guidelines and Zoning By-laws.

Since the original application was filed, there have been changes to the policy and regulatory context, including the replacement of the Provincial Policy Statement (2023) and Growth Plan with the Provincial Planning Statement (2024) and the City of Thorold Zoning By-law No. 60 (2019). The following sections summarize these policy changes in the context of the revised proposal.

2.2 Provincial Planning Statement (2024)

On August 20, 2024, the Ministry of Municipal Affairs and Housing released the Provincial Planning Statement (2024) (“**PPS**”), which came into effect on October 20, 2024. The PPS replaced the previously in-effect Provincial Policy Statement (2020) and Growth Plan for the Greater Golden Horseshoe (2019).

The 2024 PPS provides policy direction on matters of Provincial interest related to land use planning and development and will apply to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. In accordance with Section 3(5) of the *Planning Act*, all decisions that affect a planning matter are required to be consistent with the PPS. In this regard, Policy 6.1 of the PPS provides that the PPS “shall be read in its entirety and all relevant policies are to be applied to each situation”.

Compared to the 2020 PPS and 2019 Growth Plan, the 2024 PPS is intended to reduce and streamline planning rules, simplify approvals to build homes and eliminate duplication between planning documents. It emphasizes flexibility, with the intent of helping get more homes built across the province, while continuing to protect agricultural lands, cultural heritage and natural areas.

One of the key policy directions that continues to be expressed in the 2024 PPS is to build complete communities with a mix of housing options and promoting efficient development and land use patterns.

Policy 2.1.6 provides that planning authorities should support the achievement of complete communities by, among other things, accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access,

employment, public service facilities and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs.

With respect to housing, Policy 2.2.1(a) provides that planning authorities shall provide for an appropriate range and mix of housing options, and densities to meet projected needs of current and future residents of the regional market area by establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households.

Policy 2.2.1(b) provides that this should also be done by permitting and facilitating all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, and all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with Policy 2.3.1.3 (see below).

Policy 2.3.1.1 directs that settlement areas shall be the focus of growth and development, and that within settlement areas, growth should be focused in, where applicable, strategic growth areas. Policy 2.3.1.2 goes on to state that land use patterns within settlement areas should be based on densities and a mix of land uses which: efficiently use land and resources; optimize existing and planned infrastructure and public service facilities; support active transportation; are transit-supportive, as appropriate; and are freight-supportive.

Policy 2.3.1.3 directs planning authorities to support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options, and prioritizing planning and investment in the necessary infrastructure and public service facilities. Policy 2.3.1.4 provides that planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.

Policy 2.3.1.5 encourages planning authorities to establish density targets for designated growth areas based on local conditions. The 2024 PPS defines designated growth areas as “lands within settlement areas designated for growth or lands added to settlement areas that have not yet been fully developed. Designated growth areas include lands which are designated and available for residential growth in accordance with policy 2.1.4.a), as well as lands required for employment and other uses.”

Section 2.9 of the PPS addresses energy conservation, air quality and climate change. Policy 2.9.1 directs planning authorities to plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that: support the

achievement of compact, transit-supportive, and complete communities; incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities; support energy conservation and efficiency; promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.

Chapter 3 of the PPS includes policies related to infrastructure and facilities. Generally, the infrastructure policies set out in Chapter 3 place an emphasis on the need to integrate land use planning and investment in both infrastructure and transportation.

Policy 3.1.1 provides that infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs, and that planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they are financially viable over their life cycle, leverage the capacity of development proponents, where appropriate, and are available to meet current and projected needs.

With respect to sewage and water services, Policy 3.6.1, as summarized, includes that planning for sewage and water services shall accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services; and promote water and energy conservation and efficiency.

With respect to stormwater management, Policy 3.6.8 provides that planning for stormwater management shall, among others, be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle.

Section 3.9 of the PPS provides policies for public spaces, recreation, parks, trails and open space. Policy 3.9.1 provides that healthy, active, and inclusive communities should be promoted by, among others:

- planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity (a); and
- planning and providing for the needs of persons of all ages and abilities in the distribution of a full range 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 (b).

Chapter 4 of the PPS provides policies for the wise use and management of resources. Regarding natural heritage, Policy 4.1.1 states that natural features and areas shall be protected for the long term.

With respect to implementation, Policy 6.1.1 provides that the 2024 PPS shall be read in its entirety and all relevant policies are to be applied to each situation. Policy 6.1.6 requires that planning authorities keep their zoning by-laws up-to-date with their official plans and the PPS by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development. Policy 6.1.7 requires that where a planning authority must decide on a planning matter before their official plan has been updated to be consistent with the PPS, or before other applicable planning instruments have been updated accordingly, it must still make a decision that is consistent with the Provincial PPS.

As set out in Section 3.0 of this letter, it is our opinion that the revised proposal is consistent with the 2024 PPS, specifically the policies relating to residential intensification within settlement areas and the efficient use of land, planning for a mix of housing options and infrastructure.

2.3 Zoning By-law

At the time the original application was submitted to the City, the City's comprehensive Zoning By-law 60 (2019) was under appeal and therefore an amendment to the in-force Zoning By-law 2140(97) was required. We understand that as of May 23, 2024, the residential zones of Zoning By-law 60 (2019) are now in full force and effect, therefore the regulations of the previous city-wide zoning by-law (Zoning By-law 2140(97)) are no longer in effect, except for some regulations in Part 6 - parking and loading provisions.

The revised Zoning By-law Amendment continues to amend the Future Development (FD) zone that applies to the majority of the subject site. The revised Zoning By-law Amendment will continue to propose site-specific standards to implement the revised Draft Plan of Subdivision, including site-specific performance standards for single detached dwellings, townhouses, and mid-rise apartment units, in addition to public parkland, natural heritage protection and utility uses (i.e. pipeline corridor and stormwater management pond).

3.0 PLANNING AND URBAN DESIGN ANALYSIS

In our opinion the revised proposal continues to represent good planning and urban design, as set out in the February 2024 Rationale submitted with the original application. Our conclusions in that report continue to be relevant and are added to with the following analysis in support of the changes to the plan and the updated policy context.

3.1 Land Use and Density

With respect to land use and density, the conclusions of our February 2024 Rationale continue to apply, and our opinion still applies to the revised Draft Plan of Subdivision. The proposal will continue to provide a comprehensively planned development with appropriate uses that are well-suited for the Rolling Meadows Secondary Plan.

The revised Draft Plan of Subdivision supports the development of *complete communities*, including the provision of a mix of housing options, including single detached dwellings, various forms of townhouses and mid-rise apartment buildings. The revised proposal will continue to provide for public parks and trails, open spaces and utility uses. The proposed uses continue to be compatible with existing and planned uses on surrounding lands.

The revised Draft Plan of Subdivision will continue to provide 7 residential development blocks and 1 new mid-rise block to be designed through future site plan control applications. As illustrated in the revised demonstration plan, the revised proposal could result in approximately 719 to 728 residential dwelling units, providing a minimum net density of 31.7 units per net hectare to a maximum net density of 32.1 units per net hectare. This is based on the total number of dwelling units divided by the net area of the site (excluding streets, open spaces, among others), in accordance with the Thorold Official Plan. As proposed, the revised concept for development continues to conform to the Secondary Plan which requires a minimum density of 19 units per hectare per Draft Plan of Subdivision (Thorold Official Plan Policy B1.8.6.2). Variations of housing targets are permitted within the residential designation of the Secondary Plan, which includes a mix of RM Low Density, RM Medium Density and RM High Density classifications. The revised proposal will continue to contribute to the planned mix of housing by providing singles, variety of townhouses and apartment units within the Secondary Plan while exceeding the minimum overall density target of 19 units per hectare.

The revised Draft Plan of Subdivision continues to support a mix of housing. As noted above, the revised proposal introduces a mid-rise residential block that will have frontage along Upper's Lane providing approximately 203-212 units. Policy B1.8.6.4 provides that development should contribute to a harmonious mix of single and multiple accommodations so that at one time a variety of housing types are available and suitable for different age groups, household sizes and incomes. Further, Policy B1.8.6.4 provides that to minimize the impact of high density living on residents of the neighbourhood, high density developments are to be appropriately located within residential neighbourhoods with convenient access to the arterial road system and public transit to minimize traffic movement on local streets and generally adjacent to local arterial roads, open space areas and the Village Square.

The proposed mid-rise residential block is classified as RM High Density in the Secondary Plan, providing a minimum 147 units per net hectare, exceeding the minimum density target of 48 units per net hectare for the RM High Density uses within the residential designation (Policy B1.8.6.2). The proposed mid-rise residential block will have frontage along Upper's Lane, which is a local arterial road. Further, the mid-rise residential block will be within walking distance (within 5-minutes) of open space areas and the Village Square. The location of the mid-rise residential block will allow future residents of all ages, household size and incomes to be in close proximity to the variety of uses approved and proposed within the Secondary Plan Area, including the commercial uses planned within the Village Square designation. The final unit count and configuration of the mid-rise residential block will be determined through a future site plan application, however, in determining the location and appropriateness of the mid-rise residential block, significant consideration was given to the future block design and adjacent uses. The size of the mid-rise residential block (1.375-hectares) allows opportunities for increased setbacks of the future apartment building, including landscape buffers, scale of development, parking areas, location of main entrances and access points. Further, the mid-rise residential block is large enough to provide appropriate transition to adjacent uses while ensuring a well-defined and articulated streetscape. This transition could be achieved through setbacks as well as stepping of height within a future apartment building.

The revised Draft Plan of Subdivision will continue to support the direction of the Region's Official Plan and the City's Official Plan, with respect to development of identified *designated greenfield areas*. The vision for the revised development is further supported by the Rolling Meadows Secondary Plan. The PPS directs communities to be sustainable by the provision of the long-term supply of residential uses in efficient and cost-effective pattern of development that will minimize servicing costs and to avoid areas of environmental concerns, consistent with direction in the Niagara Region and City of Thorold Official Plans. In this regard, the revised proposal is consistent with policies in the PPS and conforms to policies in the Region and City's Official Plans.

The revised Draft Plan of Subdivision will continue to protect the natural heritage features within the subject site. An updated Environmental Impact Study has been prepared by Coville Consulting Inc. and summarized in Section 4.0 of this letter. No residential development is proposed within the existing woodlot and associated buffers, therefore, there will be no negative impact to the natural heritage features or their ecological function (Thorold Official Plan Policy B3.3.4).

The revised Draft Plan of Subdivision continues to provide a 1.4-hectare public community park, centrally located in the north part of the subject lands adjacent to the existing woodlot. The amount of public parkland dedication continues to be in accordance with the requirements of the *Planning Act*, which requires 5% of the developable land to use used for parkland for residential developments.

In our opinion, the proposed land uses and densities continue to be appropriate as the revised proposal provides a mix of residential uses in a compact form and in particular provides for the logical continuation of the development in conformity with the Rolling Meadows Secondary Plan.

3.2 Draft Plan of Subdivision

With respect to Section 51(24) of the *Planning Act*, in our opinion the revised Draft Plan of Subdivision continues to meet the criteria set out in Section 51(24) of the *Planning Act*, as discussed in **Table 3** below.

Section 51(24) of the *Planning Act*, specifies that, in considering Draft Plan of Subdivision, regard shall be had, among other matters, to the health, safety, convenience, accessibility for persons with disabilities and welfare to the present and future inhabitants of the municipality.

Table 3 – Draft Plan of Subdivision Criteria

Section 51(24) Criteria	Response
(a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The proposal addresses matters of provincial interest, including that it is consistent with and conforms to provincial policies and plans including the PPS, Niagara Region Official Plan, and City of Thorold Official Plan, in particular with respect to the creation of <i>complete communities</i> , the provision of a mix and range of residential uses and efficient use of land and infrastructure.
(b) whether the proposed subdivision is premature or in the public interest;	The revised Draft Plan of Subdivision is not premature and is in the public interest in that the lands have been designated for residential development through an approved Secondary Plan and are part of a <i>designated greenfield area</i> , identified through the Official Plans. The revised proposal would continue the development of the Rolling Meadows Secondary Plan from the west and south and is a logical and contiguous extension of development.
(c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The revised proposal is compatible with adjacent plans of subdivision and conforms with the policies of the Official Plans, including the Rolling Meadows Secondary Plan. The

Section 51(24) Criteria	Response
	development of roads, trails, and open spaces, among others, are coordinated with the adjacent plans of subdivision, including the approved Upper's Grove plan of subdivision to the immediate southwest.
(d) the suitability of the land for the purposes for which it is to be subdivided;	The subject site is located in an area surrounded by other existing and planned lands uses and is designed to address the broad range of uses in the surroundings. In particular, the Secondary Plan provides for residential and public open spaces uses on the subject lands. Further, the supporting studies included with the original applications and the resubmission address the suitability of the land for the purposes of the proposal, including the consideration of land use compatibility with respect to the aggregate resource area to the east.
(e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	The revised Draft Plan of Subdivision includes the number, width, location and proposed grades and elevations of new proposed new roads including connections to the adjacent existing road network. The support and conclusions of the transportation study and functional servicing report included in the original proposal continue to apply.
(f) the dimensions and shapes of the proposed lots;	The dimensions and shapes of the revised blocks will continue to provide an appropriate scale and proportion for development. As noted, the residential blocks and mid-rise residential block will be subject to future site plan applications to be developed. The submitted concept plan illustrates how the lands could be developed, which demonstrates the dimensions and shapes for the proposed units.
(g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or	There are no restrictions or proposed restrictions applicable to the developable portion of the subject lands. However, a holding

Section 51(24) Criteria	Response
the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	provision can be applied, as necessary, until all servicing matters are addressed to the City of Thorold.
(h) conservation of natural resources and flood control;	The Natural Heritage System areas and areas for flood control were assessed in the original proposal. As outlined in the original supporting studies and updated EIS, the revised Draft Plan of Subdivision continues to protect and conserve these areas.
(i) the adequacy of utilities and municipal services	The accompanying functional servicing report describes and confirms the adequacy of utilities and municipal services. Based on these reports and plans, the proposed development can be adequately serviced for sanitary and water services, and stormwater can be appropriately managed on site.
(j) the adequacy of school sites;	There are no school sites proposed in the revised Draft Plan of Subdivision.
(k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	The revised Draft Plan of Subdivision continues to include a park blocks that will be conveyed and dedicated for public purposes. Parkland is provided in accordance with the <i>Planning Act</i> requirements.
(l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use, and conservation of energy; and	The available land has been utilized to an extent that achieves an efficient use of land and infrastructure. The revised proposal continues to provide a complete and compact community that will provide public open spaces uses and which represents an efficient use of the available land supply.
(m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection	The revised Draft Plan of Subdivision will continue to provide for the development of multiple residential blocks to be developed with single detached dwellings, townhouses and mid-rise apartment buildings. Site plan control matters will be dealt with through future site plan applications. The revised concept plan demonstrates the interrelationship between the

Section 51(24) Criteria	Response
114 (2) of the City of Toronto Act, 2006. 1994, c. 23, s. 30; 2001, c. 32, s. 31 (2); 2006, c. 23, s. 22 (3, 4); 2016, c. 25, Sched. 4, s. 8 (2).	proposed plan of subdivision and how each residential block could be developed.

3.4 Built Form and Urban Design

With respect to the overall built form and urban design, the conclusions of our February 2024 Rationale continue to apply, and our opinion continues to apply to the revised Draft Plan of Subdivision. It is our opinion that the revised proposal continues to envision a high-quality neighbourhood that will include new residential, open space, and community uses. The revised proposal is generally consistent with the original proposal apart from the addition of the mid-rise residential development block, which is evaluated below.

The majority of the built form internal to the developable portion of the subject site will continue to be single detached dwellings and a variety townhouse dwellings. As noted, the revised proposal introduces a new mid-rise residential block along the Upper’s Lane frontage, in the southwest corner of the subject site. The mid-rise residential block will be 1.375-hectares in size and will provide opportunities for high density development (apartments) within the Secondary Plan Area. The Secondary Plan permits high density development within the residential designation (RM High Density) which permits multiples and apartment-built forms. The Secondary Plan does not provide a maximum restriction for height in the RM High Density classification, however, the Secondary Plan does provide criteria for high density housing in Policy B1.8.6.6.

Portion of the subject site are within 500-metres of the land east of Thorold Townline Road, which are identified as a potential bedrock resource area. In accordance with Section B1.8.12.3 (Aggregate Resource Protection Policies) within the City of Thorold Official Plan, a Land Use Compatibility Study is required to assess the land use compatibility of the revised proposal with respect to the potential future aggregate extraction site. SLR Consulting (Canada) Ltd. (“**SLR**”) has prepared a Land Use Compatibility Study in support of the revised proposal, which is summarized in Section 4.0 below. SLR recommends a Class 4 designation for the subject site. Based on the foregoing, QuadReal is requesting a Class 4 designation for the subject site.

The mid-rise residential block has been planned to accommodate a 10-storey building providing a minimum of 203 units to a maximum of 212 units. The final unit count and configuration of the mid-rise residential block will be determined through a future site plan application, however, in determining the location and appropriateness of the mid-rise residential block, significant consideration was given to the future block design and

adjacent uses, specifically the potential bedrock resource area to the east of the subject site. The proposed unit count for the mid-rise residential block is based on an apartment building not exceeding 10-storeys in height, providing opportunities for increased setbacks, including landscape buffers, minimum parking requirements, and location of main entrances and access points to ensure a well-defined and articulated streetscape along an arterial local road.

In our opinion, the built form proposed for the subject site will continue to be appropriate and would fit harmoniously within the existing and planned community and respond to the appropriate urban design policies and guidelines. The Rolling Meadows Secondary Plan Urban Design Guidelines (“UDG”) do not provide specific guidelines for mid-rise buildings. However, the revised proposal continues to contribute to the development of a variety of housing forms including a mix of single and multiple accommodations with a variety of heights and densities (Thorold Official Plan Policy B1.8.6.4, Rolling Meadows Secondary Plan Policies B1.8.6.2, B1.8.6.4, B1.8.6.5 and B1.8.6.6).

The revised proposal:

- will continue to develop portions of the subject lands with sufficiently sized blocks to accommodate a variety of built form types and unit types including appropriately sized single detached lots, townhouse blocks and mid-rise blocks (UDG section 3.1);
- will continue to provide a built form that will contain a variety of elevations and lot frontages to contribute to the neighbourhood streetscape (UDG policy 3.1.1);
- will have a proposed public park that will continue to have extensive street frontage on one public street and two private roads to increase visibility and safety (Thorold OP policy B1.8.11.2); and
- will allow the existing woodlot to remain in its natural state and continue to be protected over the long term (UDG section 1.4).

The design approach for the revised proposal to include a mid-rise block is supported by the Province’s increased emphasis on the provision of housing, specifically, policy direction within the PPS to provide a mix of housing options and promoting efficient development and land use patterns. The future development of the mid-rise block will provide transition in scale that balances the location of the subject site, specifically Block 41, and its adjacency to the proposed low-rise residential uses to the north and east of the block. Additional design features such as architectural treatments, roof materials, fencing, and detailed elevations will be determined through future application processes.

With respect to community uses and the road network, the revised proposal provides no changes, therefore, our evaluation in the February 2024 Rationale remains relevant. To address City Engineering staff’s comment regarding the need for a secondary road access in the north section of the proposed development, a future easement for emergency

access will be provided along Street L, connecting to Street B (as shown on the revised demonstration plan), to ensure an alternative emergency exit for the subject site.

4.0 SUPPORTING STUDIES

4.1 Land Use Compatibility

An updated Land Use Compatibility Study has been prepared by SLR Consulting (Canada) Ltd. focused on air quality, odour, dust, noise and vibration for the revised proposal. As noted above, a portion of the subject site is located within 500-metres of the lands east of Thorold Townline Road that have been identified as a potential bedrock resource area. In accordance with Section B1.8.12.3 Aggregate Resource Protection Policies of the City of Thorold Official Plan, a study is required to assess the land use compatibility of the Project site with the potential future aggregate extraction site. The Official Plan requires that a study considering operational noise, blasting and traffic impacts be prepared in support of a development application in this 500 m area.

This assessment considered the following:

- Industrial air quality, odour, and dust emissions;
- Industrial / commercial noise and vibration; and
- Transportation-related noise and vibration.

Based on this assessment, the proposed development is anticipated to be compatible with the proposed Upper's Quarry and other existing and future surrounding industries from an air quality perspective. It is recommended that a warning clause be included in agreements registered on title for the residential units and included in all agreements of purchase and sale or lease and all rental agreements, noting the proximity of the Upper's Quarry and potential for dust to be visible at times.

Furthermore, MECP Publication NPC-300 and the City of Thorold Noise By-Law requirements met with respect to noise/vibration with the following measures applied:

- Class 4 designation for the subject site;
- Central air conditioning provided for all residential units; and
- Appropriate warning clauses in agreements registered on title for residential units, in all agreements of purchase and sale or lease, and all rental agreements.

With the above noted warning clause and mitigation, the Project site is anticipated to be compatible with the surrounding land uses from a noise and vibration perspective.

The requirements of MECP Guideline D-6 are met with respect to air quality, dust, odour, noise and vibration.

The proposed development will not affect the ability for industrial facilities to obtain or maintain compliance with applicable Provincial environmental policies, regulations, approvals, authorizations, and guidelines. The proposed development is:

- Unlikely to result in increased risk of complaint and nuisance claims;
- Unlikely to result in operational constraints for the major facilities; and
- Unlikely to result in constraints on major facilities to reasonably expand, intensify or introduce changes to their operations.

Finally, in accordance with Section B1.8.12.3 Aggregate Resource Protect Policies of the City of Thorold Official Plan, the proposed development does not preclude or hinder future aggregate extraction at the proposed Upper's Quarry.

4.2 Transportation Impact Study

A Transportation Impact Study was prepared by C.F. Crozier and Associates in February 2024 as part of the original submission. An updated Transportation Impact Study has been prepared in support of the revised Draft Plan of Subdivision on the subject lands. Based on Crozier's updated analysis on the revised proposal, the following findings and recommendations were provided:

- Under 2023 conditions, the intersections operate with a Level of Service of "C" or better, except for the intersection of Davis Road and Upper's Lane. The intersection operates with a Level of Service of "E" in the p.m. peak hour.
- Under 2026, 2031 and 2036 future background conditions, the intersections are expected to operate similar to the 2023 conditions, as most of the intersections are expected to operate with a Level of "C" or better. The stop-controlled intersection of Thorold Townline Road at Beaverdams Road is expected to operate with a Level of Service of "D" in the p.m. peak hour, and with a control delay of 25.3 seconds in the 2036 horizon year due to the growth in traffic. The intersection of Davis Road and Upper's Lane is expected to continue with failing operations throughout the future background conditions.
- The subject development is expected to generate 314 and 417 two-way trips during the weekday a.m. and p.m. peak hour, respectively.
- The future background conditions are not expected to change under the future total conditions, other than slight increases in control delay and volume-to-capacity ratios. The intersection of Thorold Townline Road at Beaverdams Road is

expected to operate with a Level of Service of “E” in the p.m. peak hour, with a volume-to-capacity ratio of 0.88.

- It is recommended to convert the stop control intersection of Davis Road and Upper’s Lane into a signalized intersection to improve the results of the operations. Per the Ontario Traffic Manual Justifications 4-7, a signal is not warranted, using the 2036 future total projected volumes.
- The intersection of Thorold Townline Road and Beaverdams Road is expected to operate with Levels of Service of “D” and “E” and to improve these results, it is recommended to signalize this intersection. If this recommendation is used, the intersection is expected to operate with a Level of Service of “B” in the a.m. and p.m. peak hours.
- Any minor changes to the plan are not expected to materially affect the conclusions contained within this report.
- The intersections meet the relevant TAC GDGCR requirements of the sightline analysis.
- An easement has been provided along Street ‘L’ to ‘Street ‘B’ to provide for a secondary road access in response to comments received from the City.
- To help facilitate emergency access, construction should be phased in three (3) phases with Streets ‘A’ and ‘B’ completed in the first two (2) phases and private roads built as needed to always ensure multiple routes for emergency vehicles.
- For the Transportation Demand Management plan, strategies were recommended to result in more efficient use of transportation modes. They included the accessibility of bike facilities, and use of sustainable transportation modes.

In conclusion, the proposed development can be supported from a transportation operations, safety, and parking perspective. We trust that this review satisfies any transportation concerns associated with the proposed development.

4.3 Functional Servicing and Stormwater Management Report

Stantec Consulting Ltd. has prepared an updated Functional Servicing and Stormwater Management Report for the revised proposal. The updated Functional Servicing and Stormwater Management Report concludes that:

- A preliminary Site Grading Plan has been prepared to meet typical development standards, provide flood protection, maintain existing drainage patterns and protect local ecosystems during construction.
- The internal sanitary sewer system is designed such that all sewage flows from proposed and external development will be directed towards the Peel Street SPS via a gravity based sanitary trunk sewer.

- The external sanitary sewers have been designed to accommodate the design flows from the site. To date, no capacity concerns have been raised for the proposed development.
- The site can be serviced with domestic and fire water supply and distribution using conventional municipal engineering practices and compliance with City and Region Standards.
- The site can be adequately serviced with storm drainage using conventional municipal engineering practices and general compliance to Municipal Standards. The SWM pond within the site provides the ultimate water quantity control, water quality control, and erosion control for the site.

4.4 Environmental Impact Statement

Colville Consulting Inc. has prepared a letter in response to the Niagara Region comments received on the February 2024 submission, which is intended to be read in conjunction with the Environmental Impact Statement (EIS) and Wildlife Movement Linkages and Refined Lot Boundaries memorandum previously submitted to the City in February 2024 and May 2024.

This letter continues to conclude that the woodland on the subject site is providing very limited habitat functions for terrestrial wildlife species and no data is available for identified features in the vicinity of the property. Of the observed species using the woodland, Eastern Cottontail, Coyote, Grey Squirrel and Raccoon require minimal to no corridor to move between habitat patches, and therefore the potential movement corridors to be maintained in the area are sufficient for movement of these species across the landscape.

The letter describes how some white-tailed deer were documented using the woodland, and their use is primarily incidental and related to foraging and cover during times when food is available in agricultural lands. With the conversion of agricultural lands to residential, potential use of this woodland by white-tailed deer will be reduced. As such, the letter concludes that there is no ecological rationale for establishing a dedicated wildlife corridor between the woodland on this property and the thicket and woodland north of the property.

5.0 CONCLUSION

The revised Draft Plan of Subdivision and requested Zoning By-law Amendment continues to bring the site in conformity with the Niagara Region Official Plan, City of Thorold Official Plan, and the Rolling Meadows Secondary Plan. The Zoning By-law Amendment would rezone the lands to allow for residential, community, and open space uses, and to implement the revised Draft Plan of Subdivision.

The proposal will continue to facilitate the development of the subject site with multiple residential blocks, consisting of single detached homes and a variety of townhomes and a mid-rise block. The development would also continue to provide for a 1.4-hectare community park, protection of the existing woodlot feature, contribute to the trail network of the Secondary Plan, and provide for the logical extension of the existing and planned public road network. Furthermore, the revised proposal will continue to assist in accommodating an appropriate range and mix of residential uses, thereby helping to achieve efficient and resilient development and land use patterns. Further, the revised proposal will continue to include a mixture of tenures, including land lease, freehold, condominium and/or rental units.

From a land use perspective, the revised proposal continues to provide for a logical extension of the existing and planned Rolling Meadows area, which is identified as a high-priority area for future development in the municipality and accommodates projected Regional growth in a compact and efficient form. The revised proposal continues to conform to the Provincial, regional, and municipal planning policies with respect to minimum density targets for development in *designated greenfield areas*, as well as policies that support the protection of natural areas and prohibit development within areas that contain natural heritage features or functions. The revised proposal will continue to contribute to a development pattern that is consistent with surrounding context, supports the provision of a mix and range of new housing opportunities, and provides for the extension of parks and the open space system within the Rolling Meadows neighbourhood.

From a built form and urban design perspective, the proposal continues to represent an appropriate design that is compatible with the existing and emerging residential neighbourhoods to the south and west of the subject site and will provide new residential dwelling units that are compatible with the adjacent residential uses. The revised proposal continues to represent a built form that has appropriate regard for the Rolling Meadows Secondary Plan area and integrates additional connections to the City's open green space and trail network.

In our opinion the revised proposal continues to be consistent with the intent of the policies of the Provincial Planning Statement (2024) and conforms to the policies and direction set out in the Niagara Region Official Plan, the City of Thorold Official Plan and Rolling Meadows Secondary Plan.

Accordingly, our analysis and conclusions provided in the February 2024 Rationale remain relevant and applicable to the revised proposal, and it is our opinion that the proposed Zoning By-law Amendment and Draft Plan of Subdivision are appropriate and desirable for the use of the subject site and should be approved. Should you require any additional

information or clarification, please do not hesitate to contact the undersigned, David Milano (dmilano@bousfields.ca) or Celina Hevesi (chevesi@bousfields.ca) of our office.

Yours very truly,
Bousfields Inc.



Emma West, MCIP, RPP
Partner

ATTACHMENT 1

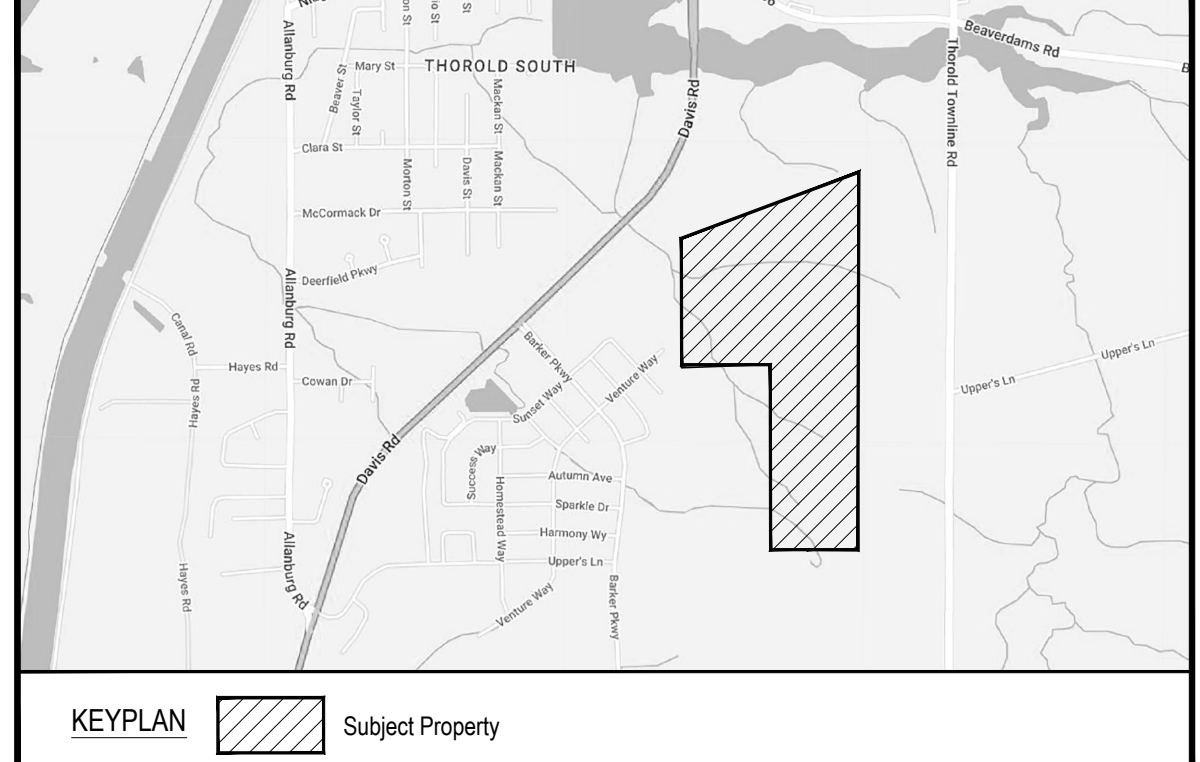
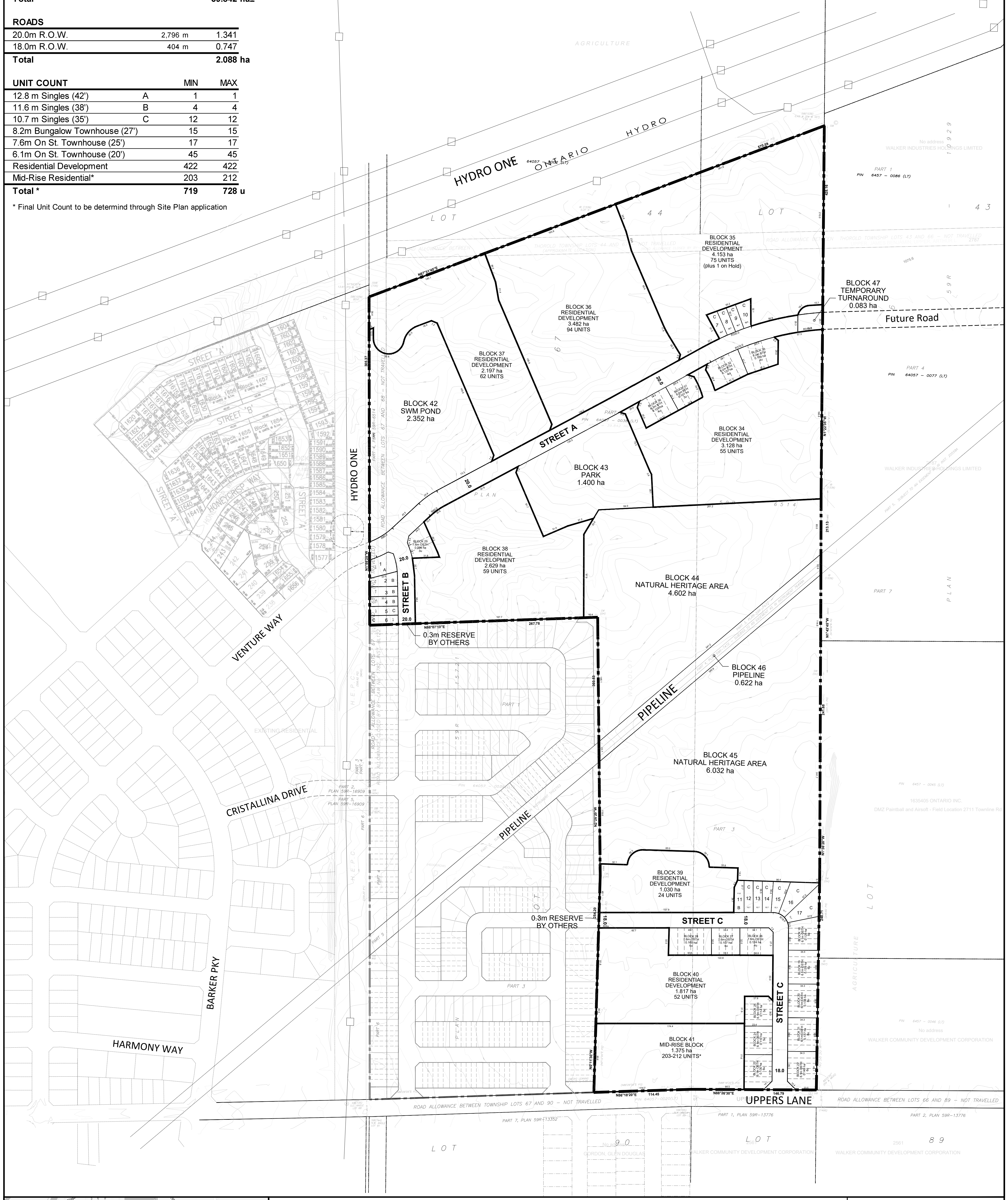
AREA TABLE		
	22219 - 90dp	February 5, 2026
Residential Singles	Lots 1-17	0.807 ha*
Townhouses	Blocks 18-33	2.047
Residential Development	Blocks 34-40	18.434
Mid-Rise Block	Block 41	1.375
SWM Pond	Block 42	2.352
Park	Block 43	1.400
Natural Heritage Area	Blocks 44-45	10.634
Pipeline	Block 46	0.622
Temporary Turnaround	Block 47	0.083
Roads		2.088
Total		39.842 ha*

ROADS		
20.0m R.O.W.	2,796 m	1.341
18.0m R.O.W.	404 m	0.747
Total		2.088 ha

UNIT COUNT			
	MIN	MAX	
12.8 m Singles (42')	A	1	1
11.6 m Singles (38')	B	4	4
10.7 m Singles (35')	C	12	12
8.2m Bungalow Townhouse (27')		15	15
7.6m On St. Townhouse (25')		17	17
6.1m On St. Townhouse (20')		45	45
Residential Development		422	422
Mid-Rise Residential*		203	212
Total *	719	728 u	

* Final Unit Count to be determined through Site Plan application

INTEGRATION TABLE		
OBSERVED REFERENCE POINTS (ORP) DERIVED FROM GNSS OBSERVATIONS USING A REAL-TIME CORRECTION SERVICE AND REFERRED TO UTM ZONE 17, NAD83 (CSRS)(2010). COORDINATES TO URBAN ACCURACY PER S.14(2) O.REG. 216/10		
ORP	NORTHING	EASTING
A	4772397.23	647716.00
B	4772425.55	648239.57
COORDINATES CANNOT, IN THEMSELVES, BE USED TO RE-ESTABLISH CORNERS OR BOUNDARIES SHOWN ON THIS PLAN.		



LEGEND
 Subject Property

NOTES
 All dimensions are in metres.
 All area measurements are computer generated.
 All elevations refer to Geodetic Datum.

ADDITIONAL INFORMATION REQUIRED UNDER SECTION 51(17) OF THE PLANNING ACT

A, B, E, F, G, J, L - As Shown on Plan
 C. This represents the Applicant's entire holding of undeveloped land in the vicinity.
 D. Residential Singles, Bungalow Townhouses, On-Street Townhouses, Residential Development Blocks, Mid-Rise Residential, Park, Natural Heritage Area, Pipeline Block, Service Block, Future Road Block and Roads.
 H. Piped water to be provided.
 I. Clay loam soil.
 K. Sanitary & storm sewers to be provided.

SURVEYOR'S CERTIFICATE

I certify that: the boundaries of the lands to be subdivided and their relationship to the adjacent lands are correctly shown.

"Please see the Original Submission" 31 01 2024
 Grant Bennett, O.L.S.
 Stantec Geomatics Ltd.
 Ontario Land Surveyors

OWNER'S AUTHORIZATION

I/we, 1000352619 Ontario Inc.
 being the registered owner(s) of the subject lands hereby authorize BOUSFIELDS INC. to prepare and submit a draft plan of subdivision for approval.

Phil Busby, Director, Development
 21 / 04 / 2026

DRAFT PLAN OF PROPOSED SUBDIVISION PART OF LOT 67 AND PART OF ROAD ALLOWANCE BETWEEN 67 AND 68 (GEOGRAPHIC TOWNSHIP OF THOROLD) CITY OF THOROLD REGIONAL MUNICIPALITY OF NIAGARA

BOUSFIELDS INC.
 3 Church Street, Suite 200
 Toronto, Ontario M5E 1M2
 P (416) 947-9744
 F (416) 947-0781

Scale: 1:2000
 Date: February 5, 2026
 Drawing Number: 22219 - 90dp

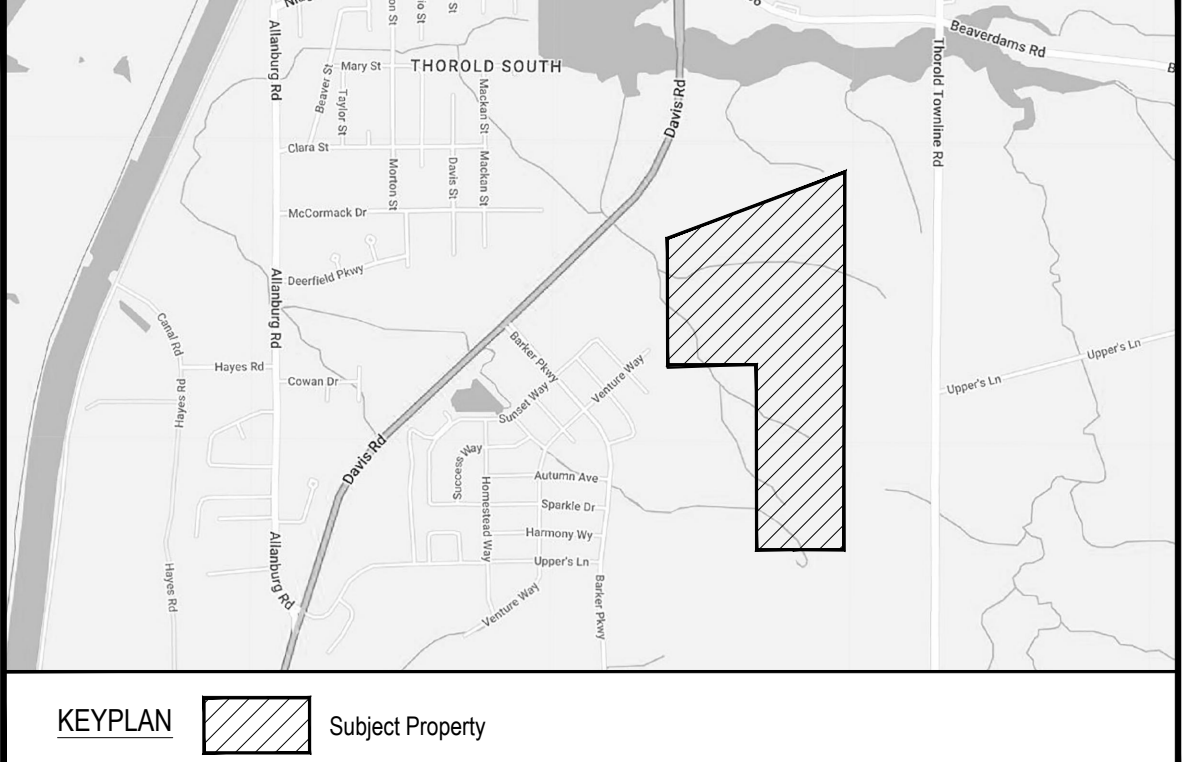
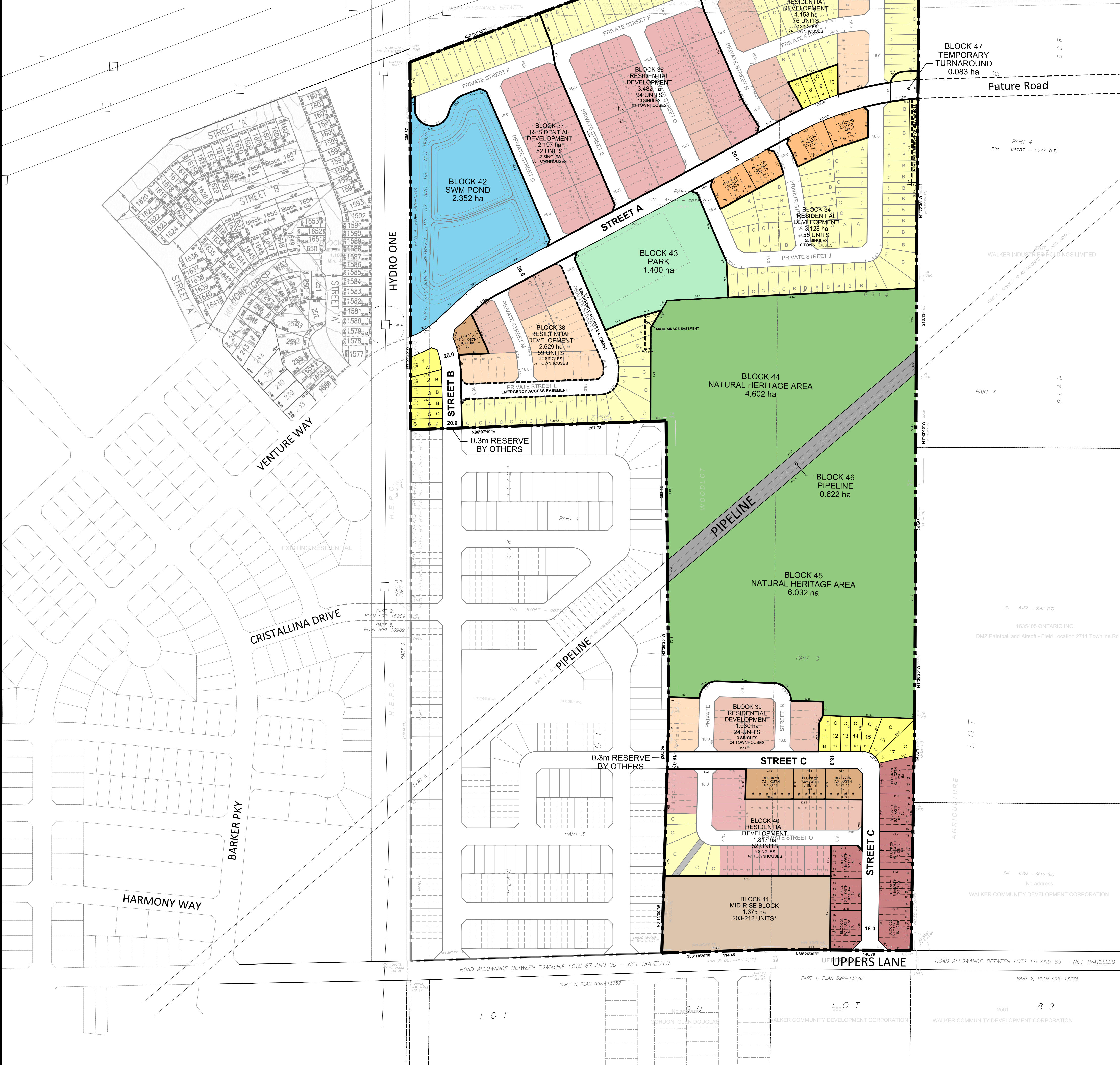
ATTACHMENT 2

North Section		Area = 21.780ha	
Unit type		Within Blocks	Freehold
6.1m (20ft) Street Townhouse	TS	122	0
7.6m (25ft) Street Townhouse	TL	35	3
8.2m (26.9ft) Bungalow TH	TB	35	15
10.7m (35ft) Single	C	50	6
11.6m (38ft) Single	B	66	3
12.8m (42ft) Single	A	38	1
Total		346	28

South Section		Area = 6.806ha	
Unit type		Within Blocks	Freehold
6.1m (20ft) Street Townhouse	TS	33	45
7.6m (25ft) Street Townhouse	TL	32	14
8.2m (26.9ft) Bungalow TH	TB	6	0
10.7m (35ft) Single	C	5	6
11.6m (38ft) Single	B	0	1
12.8m (42ft) Single	A	0	0
Total		76	66

Both Sections Total	422	94
Total Low-Rise Residential Units	516 units	

	MIN	MAX
Total Low-Rise Residential Units	516	516
Mid-Rise Residential Units	203	212
TOTAL UNITS	719	728



DEMONSTRATION PLAN

Scale: 1:2000

North Arrow

UPPER'S LANE

LEGEND

--- Subject Property

NOTES

All dimensions are in metres.
All area measurements are computer generated.
All elevations refer to Geodetic Datum.

BOUSFIELDS INC.
3 Church Street, Suite 200
Toronto, Ontario M5E 1M2
P (416) 947-9744
F (416) 947-0781

Scale: 1:2000 Date: March 11, 2026 Drawing Number: 22219-101cp