BOUSFIELDS INC.

Project No. 2097

September 23, 2025

Marc Davidson, Manager of Planning
Development Services
City of Thorold
P.O Box 1044, 3540 Schmon Parkway
Thorold, ON L2V 4A7

Dear Marc,

Re: 2nd Resubmission - Planning & Urban Design Rationale Addendum Letter
13030 Lundy's Lane – Rudanco Lands
Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision Applications
Files D09-05-2023, D12-04-2023, and D14-13-2023

This Planning and Urban Design Rationale Addendum Letter has been prepared in support of an application made by Rudanco Hospitality Corporation ("**Rudanco**"), to amend the City of Thorold Official Plan including the Rolling Meadows Secondary Plan and the City-wide Zoning By-law No.(60)2019, as amended, as well as a Draft Plan of Subdivision (the "**applications**"), with respect to the lands municipally known as 13030 Lundy's Lane in the City of Thorold, in the Niagara Region (the "**subject site**").

On behalf of our client, in December 2023, Bousfields submitted an Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications to permit 76 new private development lots and blocks, which were anticipated to include approximately 2,062 residential units in a mix and range of built forms, including single-detached dwellings, townhouse dwellings and apartment units in standalone and mixed-use building (the "**original proposal**"). The original proposal contemplated approximately 4,556 square metres of commercial gross floor area ("**GFA**"), within mixed use blocks fronting Townline Road. The original proposal included seven new public roads, one new public lane and 1.24 hectares of public parkland. The estimated density resulting from the proposal, based on the gross site area, was 126 people and jobs per hectare. In support of the application, we prepared a Planning and Urban Design Rationale (the "**2023 Planning Rationale**").

Comments on the original proposal were received from the City of Thorold, Niagara Region, City of Niagara Falls, Niagara Peninsula Conservation Authority, Walkers Aggregates, and several other commenting agencies beginning in March 2024. An applicant-led Community Information Meeting virtually occurred on March 12, 2024, and a City-led Statutory Public Meeting was held on March 19, 2024 (see **Attachment**

"A" for summary of public consultation). Numerous meetings with City Staff were held and the input received resulted in a number of changes to the proposed application, as resubmitted in November 2024 (the "**November 2024 Proposal**").

The November 2024 Proposal included significant changes including 1,770 residential units (comprised of single detached, townhouse and apartment units), 7,300 square metres of commercial GFA, 1.095 hectares of public parkland, relocating the stormwater management pond to the northeast corner of the subject site, a revised road network, and other changes summarized in our Planning and Urban Design Rationale Addendum Letter dated November 26, 2024 (the "**2024 Planning Addendum**").

Beginning in April 2025, comments were received from the City and applicable agencies and multiple meetings with staff have occurred. In response to the comments received, discussions with staff, and the evolution of other surrounding abutting draft plans of subdivision, which have been approved at the Ontario Land Tribunal ("**OLT**") (City File No. 26T-2007-02), Rudanco has updated the applications to facilitate the creation of this new community (the "**revised proposal**").

This Planning and Urban Rationale Addendum letter describes the revisions to the proposed redevelopment of the subject site. A detailed comment response matrix has been prepared and is included with this resubmission. In addition, updated engineering, transportation, land use compatibility and other supporting reports and materials have been prepared and are provided in support of the revised proposal.

Subject to the additional comments set out in this addendum letter, the findings and analysis set out in the 2023 Planning Rationale and 2024 Planning Addendum continue to be relevant and accurate. This letter concludes that the revised proposal is consistent with the policies of the Provincial Planning Statement; conforms to the Niagara Region Official Plan; and meets the intent of the City of Thorold Official Plan and Rolling Meadows Secondary Plan. In our opinion, the revised proposal continues to represent good planning and urban design, and we recommend the approval of the requested Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision.

1.0 DESCRIPTION OF REVISED PROPOSAL

The following is a summary of the changes made to the revised proposal. The revised proposal continues to seek to transform the subject site to a complete community featuring a variety of housing choices with supporting retail, parks and infrastructure. The revised draft plan of subdivision is attached as **Attachment B** to this letter, and

the revised concept plan, which illustrates how the blocks and lots established through the Plan of Subdivision could be developed, is attached as **Attachment C** to this letter.

1.1 Road Network and Infrastructure

The revised proposal continues to provide for a new municipal street grid, to be implemented through a plan of subdivision, as well as anticipates new private streets as part of the condominium development blocks.

The proposed road accesses along Thorold Townline Road have been revised to align with the recently approved draft plan to the immediate west of the subject site (City File No. 26T-2007-02) and in response to comments received from the Region with respect to intersection spacing along Thorold Townline Road. Street 'A' now maintains the same alignment as Discovery Drive to the west of the subject site (part of the OLT approved draft plan of subdivision 26T-2007-02) and extends to Thorold Townline Road. This extension now allows for connectivity to other neighbourhood collector roads in the Rolling Meadows subdivision. In response to the Region's comments, the distance between the proposed intersection of Street 'H' and Thorold Townline Road and the intersection of Lundy's Lane and Thorold Townline Road has increased to approximately 254 metres. The right-of-way width of Street 'H' has been widened to 24 metres.

The revised proposal has removed a local street in the north and south portion of the site. Street 'I' removes the connection to the lands to the north and provides a cul-de-sac at the south portion of the street. A private street is proposed to extend from Street 'C' in an east-west direction to provide access to Block 133. In the south portion of the plan, private streets are contemplated in Block 132 and would intersect with Street 'B' and Street 'F'. In addition, a potential future street connection extending north-south from Street 'F' to Highway 20 (Lundy's Lane) is illustrated on the revised concept plan, which is dependent on the download of Highway 20 from the Ministry of Transportation ("**MTO**") to the Region.

As per the request of the Region, a 0.3 metre reserve has been provided along the frontage of Thorold Townline Road and Lundy's Lane.

Rudanco has engaged with Hydro One Networks Inc. ("**Hydro One**") to discuss the proposed road crossings within the hydro corridor. At this stage of the development process, Hydro One has not expressed concerns with the proposed intersection of **Street 'A'**, **Street 'G' and Street 'I'**. It is expected that the draft plan approval will include a condition that any public street within the hydro corridor will be subject to approval by Hydro One.

In terms of site servicing, the stormwater management pond continues to be provided in the northeast corner of the subject site to provide for a buffer between the proposed residential uses and the proposed Upper's quarry to the northeast of the subject site. As indicated on the draft plan of subdivision (see **Attachment C**), the proposed residential uses are outside of the area of impact from the noise and blasting generated from the proposed Upper's Quarry, with appropriate mitigation measures. The stormwater management pond is provided in Block 136 and has an area of 1.491 hectares. Access to the stormwater infrastructure will be provided via the park (Block 134) and from Thorold Townline Road.

1.2 Parks and Open Space

The revised proposal provides for an increase in parkland dedication by providing for approximately 0.279 hectares more public parkland than the November 2024 Proposal. The revised proposal includes three park blocks with a collective area of 1.374 hectares. The amount of public parkland being dedicated is the equivalent of 6% of the total area for redevelopment (inclusive of lands planned for public roads).

In the north half of the subject site, Block 137 is 0.749 hectares and is located north of the hydro corridor, on the east side of the Street I cul-de-sac. Block 138 is 0.411 hectares in size and is located on the north side of Street A, directly south of the hydro corridor. These two park blocks will be an extension of the existing green space within the hydro corrido. Pedestrian access between these two-park block is proposed to be facilitated through the existing easement across the hydro corridor lands. Further, in September 2024, Council approved in principle the execution of a License Agreement with Ontario Infrastructure and Lands Corporation to establish, construct and maintain a recreational trail system on lands currently in use by Hydro One as an electricity transmission/distribution corridor. This agreement will facilitate the opportunity for connected public parkland on the subject site, and in the Rolling Meadows Secondary Plan area. Additionally, Rudanco has initiated discussions with the City and Hydro One to assist in establishing a final agreement to permit an expanded and connected larger public park/open space uses within the hydro corridor abutting the proposed park.

Block 139 is 0.214 hectares in size, is located on the south side of Street F and will provide public parkland in the south half of the subject site.

In addition to the three park blocks, private open spaces and outdoor amenity space areas are anticipated in Block 132, Block 133 and Block 134. The details of these condominium development blocks will be refined through future development applications.

1.3 Development Blocks

The revised concept plan continues to provide for a mix of single-detached dwellings, on-street townhouses, rear lane townhouses, condominium townhouses, back-to-back townhouses, mid-rise buildings, high-rise buildings, and standalone commercial buildings. The associated statistics with the revised concept plan demonstrate that the revised proposal could include 2,036 units and an estimated commercial GFA of 8,130 square metres. The final unit count and commercial GFA will be determined as part of the required Site Plan Approval applications for the condominium blocks.

Lots 1-115 are proposed for a total of 115 freehold, single detached dwelling units. Each of the single detached lots have a minimum frontage of 11 metres and are proposed on the following streets:

- Lots 1-21 are proposed on the north and south side of Street F;
- Lots 22-61 are proposed on the east and west side of Street G;
- Lots 62-74 are proposed on the south side of Street A; and
- Lots 75-115 are located on the east, west and north side of Street I.

Blocks 116-123 are proposed for on-street townhouses uses. These blocks are located on the north and south sides of Street C, Street D, and Street E, as well as on the east side of Street B. Each block contains between 6 to 21 units, resulting in a total of 148 on-street townhouse units. Heights of up to 3 storeys (plus rooftop access) are contemplated.

Blocks 124-131 are proposed for rear lane townhouses. These blocks are located on the west side of Street B, with flankage on Streets A, C, D, E, and F. The rear lane townhouses will be accessed from the proposed 6.5-metre laneway. Each block contains between 3 to 4 units, resulting in a total of 28 rear lane townhouses. Heights of up to 3 storeys (plus rooftop access) are contemplated. The rear lane townhouses will provide for a yard space between the house and the garage.

Block 132 is proposed to be mixed use condominium block. The revised concept plan includes 7 mid-rise and high-rise residential and mixed-use buildings, 1 condominium back-to-back townhouse block, and 1 standalone commercial/retail building. Based on the revised concept plan, a total of 1,094 units (24 townhouse and 1,070 apartment units) and 8,130 square metres of commercial GFA (including a proposed grocery store) is anticipated for this block. Heights of 4 to 18 storeys are contemplated within the following built forms:

- Building A is a 18-storey mixed-use building with a 5-storey podium;

- Building B is a 14-storey mixed-use building with a 5-storey podium;
- Building C is a 10-storey mixed-use building with a 1-storey podium;
- Building D is a 16-storey mixed-use building with a 5-storey podium;
- Building E is a 8-storey residential building with a 4-storey podium;
- Building F is a 6-storey residential building with a 4-storey podium;
- Building G is an 8-storey mixed-use building with an integrated food store (Building J), and two integrated commercial/retail buildings (Building I and Building K); and
- Building H is a 4-storey back-to-back townhouse block; and
- Building L is a standalone commercial/retail building.

Generally, all buildings in Block 132 maintains a minimum of 5 metres setback from the north parcel line (shared with Street H and Street F). The setback from the west parcel line (shared with Street B) and the setback from the east property line (shared with Townline Road) maintains a minimum of 3 metres setback. From the south parcel line (shared with Lundy's Lane), a 14.0 metres setback is provided, which meets the minimum setback requirement to a provincial highway as set out by the Ministry of Transportation. All mid-rise and podium components of the buildings in Block 132 are separated by at least 15 metres. All proposed tower components are separated by at least 20 metres.

Block 132 can be accessed from Street H, Street B and Street F and will be serviced by internal private streets. The revised concept plan illustrates a potential road access from Lundy's Lane, which is dependent on the downloading of Lundy's Lane to the Region. Underground and surface parking, as well as retail patio space and amenity space is anticipated for the Block and will be confirmed during future development applications.

Block 133 is proposed to be a residential development block. The revised concept plan includes 2 high-rise buildings and 5 blocks of condominium townhouses. A total of 479 apartment units and 22 townhouses units are contemplated for the block. Both towers are proposed to have 5-storey podiums and heights of 14 to 16 storeys are contemplated, with heights increasing north to south. It is anticipated that these condominium townhouse units will have heights of up to 4 storeys.

In general, the towers in Block 133 maintain a 5.0 metres setback from the north property line (shared with Street A), a 3.0 metres setback from the east property line (shared with Townline Road), and a 6.0 metres setback from the south property line (shared with Street H). The podium components of the buildings are separated by at least 15 metres.

A private driveway coming off Street B and Street H would service Block 133. Underground parking and private amenity space is anticipated for this block and will be confirmed during future development applications.

Block 134 is proposed to be a residential development block consisting of 2 mid-rise buildings up to 6-storeys in height. A total of 150 apartment units is contemplated for the block. Generally, both buildings maintain a 3.0 metres setback from the north parcel line (shared with the Stormwater Management Pond) and the east parcel line (shared with Townline Road). From the south parcel line (shared with Street A), both buildings maintain a 6.0 metres setback.

The mid-rise podium elements are conceptually proposed to be separated by a minimum distance of 15 metres. Access to the block is provided off Street A. Underground parking and outdoor amenity space is anticipated for Block 134 and will be confirmed during future development applications.

As noted, the revised draft plan illustrates that the proposed residential uses in this block are outside of the area of impact generated from the proposed Upper's Quarry. Further mitigation measures (i.e. air conditioning, structural material, warning clauses) will be confirmed at Site Plan.

A portion of Block 134 is subject to a holding provision, which relates to the completion of a Stage 4 Archaeological Assessment. Until a Stage 4 Archaeological Assessment is completed, this area is proposed to remain as a sodded area.

1.4 Summary of Changes

Table 1 provides a comparison of the proposed lots and blocks to be secured in the draft plan subdivision between the December 2023, November 2024 and revised proposal.

Table 1 – Comparative Statistics of Draft Plan of Subdivision

Land Use	December 2023 Original Proposal		November 2024 Revised Proposal		September 2025 Revised Proposal	
	Area (ha)	%	Area (ha)	%	Area (ha)	%
Residential Blocks	12.630	55%	12.581	55%	10.365	45%
Mixed Use Block	3.192	14%	2.568	11%	4.942	22%
Stormwater Management Block	1.552	7%	1.491	6%	1.487	6%
Parks	1.243	5%	1.095	5%	1.374	6%
Road Widening	0.183	1%	0.183	1%	0.183	1%
Roads	4.016	17%	5.013	22%	4.583	20%

Land Use	December 2023 Original Proposal		November 2024 Revised Proposal		September 2025 Revised Proposal	
	Area (ha)	%	Area (ha)	%	Area (ha)	%
Other						
Pumping Station Block	0.152	1%	-	-	-	-
Future Development Blocks	-	-	0.038	0%	0.002	
Total	22.96ha ±	100%	22.96 ha±	100%	22.96 ha±	100%

A summary of the key statistics between the December 2023, November 2024 and the revised concept plan is provided **in Table 2** below.

Table 2 – Comparative Statistics of Concept Plan

Statistics	December 2023 Original Proposal	November 2024 Revised Proposal	September 2025 Revised Proposal
Total Residential Dwelling Units	**2,062 units**	**1,770 units**	**2,036 units**
Detached Dwelling Units	46 units	82 units	115 units
Townhouse Dwelling Units	263 units	288 units	222 units
Apartment Dwelling Units	1,753 units	1,400 units	1,699 units
Commercial GFA	4,556 sq. m	7,309 sq. m	8,130 sq.m
Residential GFA	135,823 sq. m	190,001 sq. m	202,540 sq.m
Total GFA	140,379 sq. m	197,310 sq. m	210,670 sq.m
Total density (people and jobs per ha)			
Based on 2019 DC Study	126 people and jobs per ha[1]	120 people and jobs per ha	133 people and jobs per ha
Based on 2024 DC Study	169 people and jobs per ha	156 people and jobs per ha[2]	175 people and jobs per ha[3]

1.5 Required Approvals

The revised proposal continues to conform to the Niagara Region Official Plan. An amendment is required to the City of Thorold Official Plan to redesignate certain blocks to permit the anticipated uses. Specifically, it is proposed to redesignate the subject site, as necessary, to *RM – Residential, RM – High Density Residential, RM – Village Square Commercial* and *RM – Open Space & Park.* An amendment is also required to Policy B1.8.6.4 to permit the anticipated heights, free standing residential uses in

[1] Refer to 2023 Planning Rationale for breakdown of math. Calculation was derived using the City of Thorold March 2019 Development Charges Background Study.
[2] Refer to Section 4.1 of the 2024 Planning Addendum for breakdown of math. Calculation was derived using the City of Thorold March 2024 Development Charges Background Study.
[3] Refer to Section 2.1 of this letter for breakdown of math. Calculation was derived using the City of Thorold March 2024 Development Charges Background Study.

the Mixed-Use Block, and establish a maximum total gross leasable floor area for non-residential uses.

A Zoning By-law Amendment application is required to introduce appropriate zoning categories and development provisions for the lots and blocks within the proposed draft plan. An amendment is required to the City of Thorold Zoning By-law (60) 2019 to introduce blocks into the R1D, R3D, R4B and C6 zones, subject to site-specific development standards, in addition to the U and OS1 zones. A Holding Provision will be required for Block 134 as it relates to the requirement of a completion of a Stage 4 Archaeological Assessment, as well as Blocks 132-134 pending Site Plan approval.

The Draft Plan of Subdivision application is required to establish the proposed residential and mixed-use development lots and blocks, parks blocks and stormwater management block, and the proposed public street network.

2.0 PLANNING AND URBAN DESIGN ANALYSIS

In our opinion, the revised proposal continues to represent good planning and urban design, contributing to the ongoing evolution of the Rolling Meadows Secondary Plan area, which is identified as a high-priority area for future development within the municipality. The revised proposal will successfully implement the objective of the Secondary Plan by providing for a complete community with a mix and range of new housing options, commercial uses, and a connected parks and open space system.

Our analysis below is focused on the design changes since the November 2024 Proposal. As noted, this letter should be read in conjunction with our 2023 Planning Rationale and our 2024 Planning Addendum. The analysis and conclusions from that report and addendum remain relevant and applicable to the revised proposal.

2.1 Intensification

In our opinion, the Revised Proposal is supportive of numerous policy directions articulated in the Provincial Planning Statement, the Niagara Region Official Plan, and the City of Thorold Official Plan, all of which support the efficient use of land within settlement areas, and more specifically within designated greenfield areas. The revised proposal continues to provide for a comprehensively planned mixed-use community that is appropriate and desirable given policy direction to densify lands within a designated greenfield area, as well as the City's identification that accommodating growth in a Secondary Plan area as a high priority for future development.

From a density perspective, the revised proposal is expected to generate a density of approximately 175 people[3] and jobs[4] combined per hectare, therefore meeting and exceeding the overall minimum density target of 50 people and jobs for designated greenfield areas established in the NROP and Thorold OP. Work-from-home positions anticipated within the residential dwelling units could add up to 122 additional jobs[5] more jobs, or an additional 5 jobs per hectare.

OP Secondary Plan Policy B1.8.6.2 requires a minimum density of 19 unit per hectare ("uph") per draft plan of subdivision. Specifically, Policy B1.8.6.2 requires a minimum density of 12 uph and 60% single detached and semi-detached for lands designated *RM Low Density*, and a minimum density of 48 uph and 10% multiple attached and apartments for lands designated *RM High Density.* The Secondary Plan policy states that variations to these housing and residential densities when the minimum overall density target of 19 uph is achieved. OP Secondary Plan Policy B1.8.7.4.2 requires a minimum residential density of 39 units per hectare for lands designated *RM – Village Square Commercial*.

The densities allocated in the revised proposal are summarized in **Table 3** below.

Table 3 – Revised Proposal Draft Plan of Subdivision Residential Density

Land Use	Lot/Block	# of Units	Block Area	Net Density
Single-Detached Dwellings	Lots 1-115	115	4.198	27 uph
On-Street Townhouses	Blocks 116-123	148	2.952	50 uph
Rear Lane Townhouses	Blocks 124-131	28	0.744	38 uph
Mixed Use Block	Block 132	22 – Condominium Townhouses 1,070 – Apartment Units	4.942	220 uph
Residential Development Block	Block 133	22 – Condominium Townhouses 479 – Apartment Units	1.508	330 uph
Residential Development Block	Block 134	150	0.963	155 uph

[3] Population calculation derived from Persons Per Unit (PPU) provided in the City of Thorold Development Charges Background Study (March 28, 2024) prepared by Watson & Associates. PPU for single detached dwellings of 3.174 (115 units*3.174 = 365.01 people), PPUs of 2.159 for townhouses were utilized (222 units*2.159 = 479.298 people), and PPUs for apartments of 1.755 (1699 units*1.755 = 2981.745 people). 365.01 people + 479.23 people + 2981.75 people = 3,826.053 people/22.968 ha = **175 people per hectare**. A gross site area of 22.968 ha was used as there are no natural heritage features on the subject site.

[4] Job calculation derived from 450 ft2 per employee for commercial/population-related jobs provided in the City of Thorold Development Charges Background Study (March 28, 2024) prepared by Watson & Associates. 88,263 ft^2 of proposed commercial GFA/450ft2 = 196.14 jobs / 22.968 ha = **8.54 jobs per hectare.** A gross site area of 22.968 ha was used as there are no natural heritage features on the subject site.

[5] Calculation derived from a total of 2,036 total dwelling units by the work from home rate of 6% specified in the DC Background Study (2,036*0.06 = 122.16 jobs). 122.16 jobs / 22.968 ha = **5.3 jobs per hectare**. A gross site area of 22.968 ha was used as there are no natural heritage features on the subject site.

As demonstrated in Table 3, the minimum density requirements set out in the Secondary Plan have been achieved for the draft plan of subdivision, as well as the minimum density requirements for the proposed land use designations have been met and exceeded by the unit counts anticipated by the revised concept plan.

Although the subject proposal contemplates higher densities than those established in the Secondary Plan, they are supportable in land use planning terms, since they are compatible with the surrounding land uses, can be supported by existing and planned infrastructure, do not create any unacceptable built form impacts, and will add a new form of housing and non-residential uses that will make the Secondary Plan area a more complete community.

Optimizing the use of land and infrastructure on the subject site would be consistent with both good planning practice and overarching Provincial, Regional and City policy direction, subject to achieving appropriate built form relationships. In our opinion, the density generated from the revised proposal can be deployed across the subject site in a manner that does not result in unacceptable built form impacts.

2.2 Land Use

It remains our opinion that the proposed range of uses contributes to a complete community and is appropriate from a land use perspective. In this regard, the proposed re-designations would add to the range of housing in the neighbourhood and introduce new apartment dwellings in stand alone and mixed-use midrise and tall buildings, while also still accommodating much needed non-residential commercial uses that do not currently exist in the Secondary Plan area.

The revised proposal is generally compatible with the existing and planned uses on the surrounding lands, including the planned and existing urban residential uses, surrounding open green spaces, and community uses. With respect to the proposed Upper's Quarry, residential uses have been removed outside of the zone of influence and are buffered by a proposed stormwater management pond in the northeast corner. We rely on the analysis provided in the Land Use Compatibility Study prepared by Thornton Tomasetti included with the resubmission with respect to air emissions, dust, odour, noise and vibration impacts generated from the proposed quarry.

The Official Plan Amendment would re-designate the majority of Block 132 (the portion south of Street F) from *Highway Commercial* to *RM – Village Square Commercial*. In our opinion, this redesignation is desirable, since it would reimagine the commercial areas to include stand alone and mixed use buildings to accommodate local servicing commercial uses to support the primarily residential uses in the Secondary Plan area.

The expansion of the commercial uses north also addresses the vehicular access issue associated with Lundy's Lane, since it is an MTO road and vehicular access is restricted to Lundy's Lane. The concept plan provides stand alone and mixed use commercial buildings along Street H and Thorold Townline Road, which is proposed to be a signalized intersection and will improve access for the Secondary Plan area residents. The re-designation also allows for stand alone residential apartment buildings in a compact development form, which aligns with the intent of the Secondary Plan. The amendment also restricts stand alone residential uses only when they are part of a larger parcel with commercial uses.

The proposal also introduces site specific *RM – Residential* and *RM – High Density* designations to accommodate higher density residential uses, which are not currently found in the Secondary Plan area and will add to the housing options in the neighbourhood and make it more complete. Dwelling units are permitted used within the *RM - Residential* land use designation, which is proposed for the single detached, street townhouse and rear-lane townhouse lots and blocks. The *RM – High Density* designation also permits dwelling units, which is proposed for Block 133 and 134. Blocks 133 and 134 contemplate two high-rise buildings and five blocks of condominium townhouses (Block 133) and two 6-storey apartment buildings (Block 134). The revised concept plan results in a residential density of 330 uph for Block 133 and 155 uph, meeting the minimum residential density requirement of 48 uph set out in Policy B1.8.6.2.

Dwelling units are also permitted in the *RM – Village Square Commercial*, provided that they are above commercial uses, which Block 132 is proposed to be redesignated to. The unit counts set out in the revised concept plan result in a residential density of 218 uph for Block 132, meeting the minimum residential density of 39 uph set out in Policy B1.8.7.4.2. The draft official plan amendment included with the resubmission permits standalone residential and commercial uses within the *RM – Village Square Commercial* designation, to allow for sufficient flexibility in accommodating a range of mix of built forms and building typologies across these blocks.

The revised proposal continues to expand the housing options in the Rolling Meadows neighbourhood by providing 83% apartment units, 11% townhouse units and 6% single detached units. Further, the revised proposal includes approximately 8,200 square metres of commercial GFA, including a grocery store. The proposed mix of residential uses and grade-related retail, along with public and private open spaces, will help establish a vibrant, mixed-use node to both live and work.

The revised draft plan provides for three park blocks, which two of the blocks are adjacent to the stormwater management pond and hydro corridor. These open spaces will create space for leisure, healthy living and recreation for future residents. The

public road network, and future trail connections will continue to promote active forms of transportation. The proposed land uses are to be secured through a phased development strategy, which will set out the logical sequence of required infrastructure and secure the appropriate provision of parkland.

In addition, the revised plan of subdivision continues to meet the criteria set out Section 51(24) of the *Planning Act.* With respect to Section 51(24) c) of the *Planning Act*, the revised proposal aligns with Discovery Drive to the west of the subject site (part of the OLT approved draft plan of subdivision 26T-2007-02) and extends to Thorold Townline Road.

2.3 Built Form and Urban Design

As noted in our 2023 Planning Rationale and our 2024 Planning Addendum, the subject site is contextually appropriate for the proposed building heights and it continues to be our opinion that the revised proposal facilitates compact urban form at an appropriate scale, including meeting the criteria set out in Section 51(24) of the *Planning Act*. The revised proposal maintains greater heights at the intersection of Lundy's Lane and Townline Road, resulting in a transition down in scale generally from east to west. Therefore, it remains our opinion that the built form justification analysis provided in our 2023 Planning Rationale and our 2024 Planning Addendum remains applicable.

With respect to the proposed building height, the Secondary Plan seeks to establish "a gradation of building heights and densities with sufficient horizontal separation distances between taller buildings and low rise buildings" (see Policy B.1.8.6.4) and building heights of "high-density density development should range in height from eight (8) storeys to ten (10) storeys" (see Policy B.1.8.6.5). In this regard, the proposed concept plan includes a range of building heights for the *High Density* and *Village Square Commercial* designations from 6- to 18-storeys. These proposed buildings are well separated from low-rise buildings with a minimum separation distance of 20 metres for mid-rise buildings and 50 metres and greater for tall buildings.

Furthermore, built form impacts from the proposed development were previously reviewed via the Pedestrian Wind Assessment, prepared by SLR Consulting and dated December 15, 2023 and the updated shadow study prepared by Giannone Petricone Associates and dated September 18, 2025. These studies demonstrate that any built form impacts generated from the proposal are adequately limited. In order to ensure the final plan for Blocks 132 and 133 are developed generally, the proposed zoning by-law amendment includes a holding provision that requires a master plan and updated wind and shadow studies to the satisfaction of the City. In our opinion,

this requirement will ensure that these blocks are developed in accordance with the Secondary Plan and any built form impacts will be adequately limited.

2.4 Servicing Considerations

A revised Functional Servicing Report ("**FSR**") and Stormwater Management ("**SWM**") Report has been prepared by MTE Consultants Inc. ("**MTE**").

The summary of the findings of the FSR are:

- Proposed grading of the subject site has been designed in accordance with City of Thorold standards to convey storm runoff to a SWM facility for treatment;
- Sanitary service to the south portion of the subject site can be provided by connection to the existing gravity sanitary sewers on Lundy's Lane, without upgrade to existing infrastructure. The remainder of the subject site can be serviced through the extension of existing gravity sanitary sewers along Upper's Lane and Thorold Townline Road to the limit of the Subject Lands then throughout the Subject Lands along proposed municipal roads. Upsizing of approximately 250m of 675mm diameter sewer to 750mm diameter will be required on Allanburg Road from Clara Drive to the Peel Street Sewage Pumping Station.
- Adequate domestic and fire water supply for the proposed development can be provided by a network of 200 – 250mm watermains throughout the subject site.
- A new watermain loop from Upper's Lane to Thorold Townline Road connecting to the existing 500mm diameter watermain on Barron Road is required.
- Future connection to proposed watermains within future phases of the Rolling Meadows development adjacent to the subject site is expected to improve the Fire Flow through the area.
- Storm drainage will be collected and conveyed to a proposed wet pond stormwater management facility within the subject site which will treat stormwater prior to discharging to Beaverdams Creek east of Thorold Townline Road. Under all design storm events, discharge to each location is controlled to less than the pre-development levels.
- All stormwater management criteria for the proposed development can be achieved through incorporation of appropriate SWM measures.
- Erosion & Sedimentation Controls can be implemented to ensure that site soils remain on site during grading and construction works.

- The proposed development can be adequately serviced through the extension of existing utilities including hydro, gas, cable TV and telephone.
- Water and sanitary infrastructure proposed along the Upper's Lane corridor will benefit future development lands outside of the subject site. Cost sharing of this infrastructure with benefitting third parties is recommended.

The SWM Report concludes that the stormwater management design provides adequate attenuation for the 2 to 100-year storm events and meets the design requirements set by the Region of Niagara. In addition, the post-development flows will be controlled by orifice controls in the stormwater management pond and sufficient storage volume is provided within the pond. A stormwater quality control "Enhanced" level of 80% TSS removal will be achieved via best management practices.

Both the FSR and SWM Report recommends draft plan approval and to proceed to the next detailed design.

2.5 Transportation Considerations

Paradigm Transportation Solutions Limited ("**Paradigm**") has prepared a revised Transportation Impact Study ("**TIS**") in support of the revised proposal. The TIS analysis has been broken into two parts: Phase 1, which includes the low-density residential built forms, and is assumed to be to the year 2028, dependent on market conditions and; full build-out of the overall development, which includes the reminder of the residential and commercial uses and is assumed to be to the year 2035, dependent on market conditions.

The TIS found that the Phase 1 development is forecast to generate 124 new trips in the AM peak hour and 161 new trips in the PM peak hour. The overall development at full build-out is forecast to generate 803 new trips in the AM peak hour and 1,278 new trips in the PM peak hour.

Future traffic volumes are estimated to consist of generalized background traffic growth, as well as traffic generated by the future development of the rolling meadows development and the proposed Upper's Quarry. The TIS identified that as the traffic volumes increase at the study area intersections, the existing capacity issues are exacerbated, and additional issues are identified at the study area intersections.

Remedial measures are identified in the TIS for Phase 1 and to accommodate the full build out of development. A summary of the remedial measures and when they are required to address the study area intersection operations is provided in Table 6.1 of the TIS. Some of the remedial measures are warranted regardless of the addition of proposed developments generated traffic.

Phase 1 remedial measures include:

- Lundy's Lane (Highway 20) and Thorold Townline Road require a second eastbound and westbound through lanes, and a southbound right-turn lane with 50 metres of storage;
- Lundy's Lane (Highway 20) and Barker Parkway require a two-lane roundabout along with a second eastbound and westbound through lanes;
- Thorold Townline Road and Beaverdams Road requires a traffic control signal and auxiliary turn lanes to be accommodated without impacting the environmental features surrounding the intersection;
- Thorold Townline Road and Street A require a northbound left-turn lane with 15 metres of storage; and
- Thorold Townline Road and Street H require a northbound left-turn lane with 15 metres of storage.

With respect to the full build out of development, the following remedial measures are identified to accommodate site generated traffic:

- Lundy's Lane (Highway 20) and Thorold Townline Road require a westbound right-turn lane with 50 metres of storage;
- Thorold Townline Road and Street A require a northbound left-turn lane with 40 metres of storage is warranted from the 2035 total horizon, which is an increase of 25 metres from Phase 1. A southbound right-turn taper is warranted from the 2035 total horizon; and
- Thorold Townline Road and Street H, installation of traffic control signals, a northbound left-turn lane with 80 metres of storage is warranted from the 2035 total horizon, which is an increase of 65 metres from Phase 1. A southbound right-turn taper is warranted from the 2035 total horizon.

Lastly, the TIS recommends the MTO/Region monitors the future traffic volumes at the study area intersections and consider implementing the following when necessary:

- At Lundy's Lane (Highway 20) at Thorold Townline Road a second eastbound and westbound through lane, and a southbound right-turn lane with 50 metres of storage;
- At Lundy's Lane (Highway 20) and Barker Parkway a two-lane roundabout; and a second eastbound and westbound through lane;
- At Thorold Townline Road and Beaverdams Road a traffic control signal, dependent on the surrounding environmental features;

- Reduce the speed limit along Thorold Townline Road to 50 km/h to reflect future build-out of the area;
- When Phase 1 construction begins at the proposed Street A intersection, a northbound left-turn lane with 15 meters of storage be constructed. At full build-out, the storage lane should be extended to 40 meters, and a southbound right-turn taper should be added;
- When Phase 1 construction begins at the proposed Street H intersection, a northbound left-turn lane with 15 meters of storage should be constructed. At full build-out, the storage lane should be extended to 80 meters, and a southbound right-turn taper should be added; and
- At full build-out it should be determined if a westbound right-turn lane is required at the Lundy's Lane and Thorold Townline Road intersection to support the build-out of the surrounding area.

2.6 Land Use Compatibility Considerations

A revised Noise Impact Study & D6 Combability review (the "**LUC Report**") has been prepared by Thornton Tomasetti ("**TT**") in support of the revised proposal.

With respect to noise, the LUC Report considers that the proposed development is considered to feasible regarding noise. Transportation noise impacts on the Project are expected to meet all applicable MECP noise requirements with the inclusion of upgraded façade construction, acoustic barriers, ventilation requirements and warning clauses. Another review should be completed once detailed floor and façade plans are available.

The revised proposal is considered feasible regarding railway vibration given that the subject site is located more than the minimum separation distance.

The LUC Report concludes that air emissions, dust, and odour from the proposed quarry are not anticipated to be a concern for the proposed development based on their review of the Quarry Air Quality Assessment (AQA). The revised proposal is considered to be compatible with the Quarry regarding air emissions, dust, and odour, without additional controls beyond those identified in the Quarry AQA. Stationary noise impacts from the proposed quarry were assessed based on the information available and with the inclusion of quarry noise control measures (i.e. 5 metre temporary barrier), the applicable MECP noise limits are predicted to be met.

Blasting impacts (vibration and noise) are not anticipated to be a concern for the revised proposal and is considered to be compatible, without additional restrictions already applicable to the proposed quarry's blasting operations. A general warning

clause is recommended regarding the proposed quarry operations, as requested by the City of Niagara Falls.

Lastly, the LUC Report concludes that the revised proposal is considered compatible with surrounding land uses, and the proposed development is not likely to result in an increased risk of complaint and nuisance claims, is not likely to result in operational constraints for the surrounding industries and commercial operations, and is not likely to result in constraints on surrounding industries to reasonably expand, intensify or introduce changes to their operations. No additional studies are currently recommended.

3.0 CONCLUSION

In our opinion, the revised proposal is in keeping with the planning and urban design framework established by the applicable planning documents, specifically the PPS 2024, and the Niagara Region OP, and meets the intent of the City of Thorold OP and Rolling Meadows Secondary Plan, all of which support the efficient use of lands within settlement areas and the direction to densify lands within a designated greenfield area. the YROP, the VOP, and the Secondary Plan.

The revised proposal will help to implement the vision established in the Secondary Plan, an area identified as a high-priority area for future development in the municipality. The revised proposal provides an integrated mixture of housing types and densities and integrates commercial employment opportunities within the new neighbourhood.

Accordingly, our analysis and conclusions provided in the 2023 Planning Rationale and our 2024 Planning Addendum remain relevant and applicable to the revised proposal, it is our opinion that the proposed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of subdivision, are appropriate and desirable 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 or Celina Hevesi (chevesi@bousfields.ca) of our office.

Yours very truly,
Bousfields Inc.

David Falletta, MCIP, RPP
Partner

BOUSFIELDS INC.

ATTACHMENT A

Project No. 2097

September 3, 2025

Marc Davidson, Manager of Planning
Development Services
City of Thorold
P.O Box 1044, 3540 Schmon Parkway
Thorold, ON L2V 4A7

Dear Marc,

Re: Public Consultation Summary
13030 Lundy's Lane – Rudanco Lands
Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision Applications
Files D09-05-2023, D12-04-2023, and D14-13-2023

Bousfields Inc. is the planning consultants for Rudanco Hospitality Corporation ("**Rudanco**"), the owner of the lands known addressed as 13030 Lundy's Lane in the City of Thorold, in the Niagara Region (the "**subject site**"). On behalf of our client, we are pleased to submit this letter to summarize the public consultation that has occurred to date in support of an application to amend the City of Thorold Official Plan including the Rolling Meadows Secondary Plan and the City-wide Zoning By-law No.(60)2019, as amended, as well as a Draft Plan of Subdivision (the "**applications**") to permit the comprehensive redevelopment of the subject site.

The following letter provides a summary of the public consultation efforts occurred to date, including key details from the virtual applicant-led public meeting that took place March 12th, 2024, as well as the City-led statutory public meeting that took place on Wednesday March 19th, 2024 , including the responses to the feedback received.

Details of Applicant-Led Public Meeting

Bousfields prepared a community meeting flyer with respect to the virtual applicant-led public meeting and received mail out addresses within a 120-metre radius from City Planning Staff. The notices were mailed out February 28, 2024.

A digital copy of the meeting notice was circulated to City Planning Staff; however, no staff attended the meeting. Our client also provided the local Councillors digital copies of the meeting notice, but no Councillors were able to attend. There are no known organized neighbourhood associations or business improvement area associations in the area.

The applicant-led public meeting was held on Tuesday March 12, 2023 at 6:30 pm. A brief presentation was given by Bousfields Staff at 6:40 pm, followed by a question and answer ("Q&A") period.

The meeting was attended by Bousfields representatives (Caitlin Allan, Partner and Celina Hevesi, Planner), the owner's project manager (Peter Horn), and one member from the community.

Only one question was asked by the sole attendee, which they had asked for a copy of the presentation. Bousfields forwarded the community member and City Staff a copy of the presentation the following day.

The applicant-led public meeting was not recorded.

Details of the Statutory Public Meeting

The Statutory Public Meeting was held on Tuesday March 19, 2024, during the City's regularly scheduled Council meeting. The Council meeting began at 6:30 pm and the Statutory Public Meeting was item number 11.1 on the agenda.

The Statutory Public Meeting was organized by City Staff, including the circulation of the meeting notice. Community members could attend in person or virtually.

The owner and their respective project team attended the meeting in person, which included Bousfields representatives (David Falletta), the owner (Jeremia Rudan, Placemaker Co), the Architect (Ralph Giannone, Giannone Petricone Associates), the Civil Engineer (Rob Melick, MTE Consultants), the Transportation Consultant (Scott Catton, Paradigm Transportation Solutions), and the project manager (Peter Horn). The Mayor and Councillors D'Angela, De Divitiis, Dekker, DeRose, Handley, Longo, O'Hare, Sentence attended in person. It's our understanding that no members of the community attended the Statutory Public Meeting in person; however, the solicitor for the Rolling Meadows Land Development, Callum Shedden, attended the meeting virtually.

Bousfields provided a brief slideshow presentation beginning at approximately 10:15pm. The presentation was posted on Council's agenda the day prior to the meeting and was the same presentation utilized for the applicant-led virtual meeting held the week prior. The presentation is attached hereto as Attachment D. Following the presentation, a question and answer period occurred with several verbal questions and comments were provided by the Mayor and Councillors. These questions and answers are summarized in Table 1 below.

Table 1 provides a summary of the public comments and questions received during and following the meeting, as well as the responses provided. In summary, the overall feedback received was positive. Key comments and questions were related to transportation design, timing, parkland, the proposed commercial uses, affordability, tenure, and the proposed nearby quarry.

Table 1 – *Summary of public comments, questions, and responses*

Theme	Question/Comment	Response
Servicing	Where will the wastewater/sewage be directed? Will it be the new Niagara Falls station?	MTE explained that the Functional Servicing Report submitted with the applications provided preliminary design for sanitary discharge. This includes a new sanitary sewer heading north up Thorold Townline Road to Upper's Lane and then heading west to the existing sewer at Upper's Lane and Barker Parkway. From there, it discharges to Black Horse pump station.
Transportation	There are multiple entrances along Thorold Townline Road.	Bousfields responded that the MTO will not allow access to the site off Lundy's Lane. The preliminary road network is based on analysis completed by our transportation expert from Paradigm.
	Does the proposal consider traffic calming measures?	Paradigm answered that calming measures have not been identified at this time because comments have not been received from the Region or the City on the submitted Transportation Impact Study. If any concerns are raised, the transportation expert will certainty address them.
	Is there a plan for transit routes within the subdivision?	Bousfields responded that we have identified where current transit exists and think there is an opportunity for a transit stop at the

		corner of Lundy's Lane and Thorold Townline Road. The owner is looking for comments from the Region and transit provider on where appropriate locations will be and is willing to work with staff on the location of a potential transit stop. The draft plan provides two collector roads, which are wider and may be able to provide transit.
	Recommended the applicant to work with the Region to reduce the speed along Thorold Townline Road	Bousfields responded that we appreciate your comment and noted that the intersection along Thorold Townline Road will be controlled with lights.
	Street A leads directly into the Rolling Meadows property. Have you solved this?	Bousfields responded that they are working with the landowner on this connection. Bousfields also explained how we delegated at the redline approval for Rolling Meadows since Street A provides a connection to Barker Parkway which ultimately connects to Lundy's Lane.
	Who is responsible for maintaining the private roads?	Bousfields responded that condo blocks would be serviced by private roads and would have a condo fee associated with clearing snow, waste, etc.
Parking	Can a few parking spots be provided at the park or along the roads abutting the park?	Bousfields responded that the park has frontage on a wider street that has opportunity to provide parking, and the owner can work with staff on this.
	Has a parking ratio been considered for this project?	Bousfields explained that the draft zoning by-law amendment does not propose to modify the parking ratio.

Parkland	What amenities are proposed in the parks? Could the proposal consider a splashpad?	Bousfields explained that the proposal is still at draft plan stage, and that during conditions of approval, the owner can work with Staff to determine what infrastructure is needed for the parks.
	Do you meet parkland dedication requirement?	Bousfields responded that the proposed development exceeds the parkland dedication requirement and provides for an additional POPS space.
	Please explain a POPS.	Bousfields explained that a POPS space is essentially a space that anyone can access and that the space is maintained by the owner.
Commerical Uses	Is the owner committed to providing commercial space?	Bousfields responded yes and explained that the proposal includes standalone retail and retail in the base of the buildings. Additionally, the owner is actively pursuing a grocery store on the site.
Residential Uses	Are all the units condominium?	Bousfields responded that at this time, the unit tenure is undetermined as some units may be condo or rental units.
	Will any of the units be for sale under 500,000s? Would like to see attainable units.	Bousfields explained that it's too early in the process to determine the price of units; however, the proposed development is trying to add a mix of housing to the neighbourhood.
	What is the tallest building?	Bousfields responded that the tallest building proposed is at the corner of Lundy's Lane and Thorold Townline Road and is proposed to be 18-storeys in height.
	Are the units proposed a mix?	Bousfields explained again that it's too early in the process to establish a unit mix for the apartment units; however, at this stage,

		generally 60% one bedroom, 30% two bedroom and 10% three bedroom.
Upper's Quarry	Any concerns with the proposed quarry?	Bousfields explained that multiple letters to the Region and the City of Niagara Falls have been submitted by the owner. Generally, minimal impacts are anticipated Additionally, Bousfields has ongoing meetings with the quarry to resolve the issues.
Timing	How many years will construction take from start to finish?	Bousfields responded that the development will be driven by the market and done in phases. The low-rise will go quick and high-rise phases will take longer to build out.
	Is the owner committed to the complete build out of the project?	Bousfields responded that the owner is here today and they are committed to building this out.

Following the question and answer period, the solicitor for the Rolling Meadows Land Development, Callum Shedden, provided a brief virtual delegation. Mr. Shedden explained that Rolling Meadows is not objecting to the proposed development; however, they have put a lot of infrastructure into the ground that Rudanco will get the benefit of. Additionally, Mr. Shedden requested Council to provide for a cost-sharing condition as a condition of draft plan approval similar to what was done for the Upper's Grove development. A few of the Councillors asked Mr. Shedden if Rolling Meadows and Rudano have met to discuss the details of a cost-sharing agreement and if this process is common. The owner nor staff responded to the delegation made by Mr. Shedden.

No other community members asked questions at the Statutory Public meeting, which concluded at approximately 11 pm.

The meeting was recorded and can be found on the City's YouTube channel.

Conclusion

It should be noted that the public will have an opportunity to provide additional feedback at Council regarding the applications.

We trust that the foregoing is satisfactory. However, if you have any questions or require additional information, please do not hesitate to contact the undersigned or Celina Hevesi (chevesi@bousfields.ca) of our office. We look forward to working with the City on this project.

Respectfully submitted,
Bousfields Inc.

David Falletta, MCIP, RPP
Partner