PREPARED BY:
MDT URBAN TRAFFIC SOLUTIONS LTD.

220-222 ST.CLAIR STREET

PARKING JUSTIFICATION STUDY

CITY OF CHATHAM

SEPTEMBER 2026

PREPARED FOR:
NEMANIC LAW PC

September 11, 2026 Municipality: Chatham-Kent

RE: 220-222 ST. CLAIR STREET (CHATHAM, ON) – PARKING JUSTIFICATION STUDY

This Parking Justification Study has been prepared in support of the proposed conversion of the existing apartment building at 220-222 St. Clair Street in the Municipality of Chatham-Kent. The proposal increases the number of residential units from 21 to 48 dwelling units within the existing building footprint and retains the existing commercial unit at grade. Through design the parking is improved from 27 to 38 spaces. According to the Zoning By-law, the proposal generates a requirement of 69 parking spaces for the residential (1.25/unit) and commercial use (9 spaces) against the 38 spaces proposed, and relief is sought for 31 spaces. Notwithstanding the deficiency, the original development was deficient in parking at 27 spaces against a commercial requirement of 10 spaces across Units 1A and 1B, of which 9 spaces relate to the occupied unit, leaving only 18 spaces available for the 21 residential units (0.86 spaces/unit) and a 9 space deficiency overall. The existing building was legally established prior to the passing of the By-law and is deemed to comply with the parking provisions under Section 4.23. Holding the commercial requirement of 9 spaces; the relief is attributable to the residential component, which retains 29 of the 38 spaces.

Parking utilization surveys were undertaken over two consecutive days in March 2026, with 7 of the 21 units + commercial unit occupied. Peak occupancy across the property was 8 vehicles overnight, and the commercial unit occupied no more than 6 spaces on a weekday within daytime working hours. Adjusted for tenancy and corroborated against two comparable proxy sites of one and two-bedroom units, the data yields a design rate of 0.87 vehicles per occupied unit. The applicable ITE and municipal benchmarks for similar forms indicate a demand of 18 to 26 vehicles at 48 units, of which the 29 spaces available to the residential component accommodate.

The proposed supply can be supported by the development with the following framework in place:

- A cap of 24 resident spaces assigned by lease (50%), and 5 visitor spaces (which increases to 14 outside commercial hours for a total of 29%).
- Allocation of 9 spaces to the commercial unit.
- Provision of 12 secure bicycle spaces for residents, which can be increased in the future if needed.
- Provision of subsidized transit passes for tenants without an assigned vehicle space.

In my professional opinion, subject to the measures set out above, the development can succeed in its current built form and not result in adverse transportation or parking impacts and represents reasonable and appropriate transportation planning practice.

Respectfully submitted,

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Parking Justification Study

1. INTRODUCTION

1.1. Purpose

This summary has been prepared to evaluate the transportation and parking implications associated with the proposed interior alterations to the existing apartment building at 220-222 St. Clair Street, (herein referred to as 220 St. Clair Street). The subject site involves an increase in the number of residential units from 21 dwelling units to 48 bachelor-style dwelling units, while maintaining the existing building footprint and the commercial unit at the front of the property. The existing parking supply is noted to be approximately 27 parking spaces.

The primary issue under consideration relates to the proposed parking supply in the context of the proposed increase in dwelling units. The current Municipality of Chatham-Kent Zoning By-law prescribes parking requirements for apartment housing; however, this assessment considers whether those generalized standards appropriately reflect actual parking demand and transportation impacts associated with the subject property. This study reviews existing site conditions, observed parking demand and vehicle movements, proportional growth projections, site circulation characteristics, and the relationship between unit characteristics and anticipated parking demand for the site.

The assessment is limited strictly to transportation matters, including:

- Parking supply;
- Parking demand; and
- Site circulation and access operations

The central question is whether the proposal will result in undue adverse transportation or parking impacts and whether the proposed parking supply and circulation arrangement are functionally adequate for the subject site.

1.2. Qualifications

I am a Professional Engineer licensed since 2017 with Professional Engineers Ontario (PEO), License No. 100188927. I obtained a Bachelor of Civil Engineering from McMaster University in 2012 and have over fourteen (14) years of professional experience in transportation engineering. I was previously registered with the Association of Professional Engineers and Geoscientists of British Columbia from 2019 to 2024.

My experience includes the preparation and review of traffic impact studies, parking assessments, operational analyses, and transportation planning studies for residential and infrastructure projects. I have been involved in transportation analysis for major transit projects, including the Scarborough Subway Extension and the Surrey–Langley SkyTrain Project. In these roles, I served as part of the project management team and as transportation lead for major traffic analysis and design components, acting as Owner's Engineer on behalf of public agencies including the Toronto Transit Commission (TTC), Metrolinx (MX), and TransLink.

My opinions in this report are based on my professional experience and accepted transportation engineering standards and practices. See **Appendix A** for full CV.

2. SITE CONTEXT AND EXISTING CONDITIONS

2.1. Existing Site

Site Address: 220 St. Clair Street, Chatham ON
Existing Building: 21 residential units / 2 commercial units (See **Appendix B** for site plan)
Existing Parking: ~27 spaces*
**Field verification via the parking survey confirmed the existing supply to be approximately 27 spaces. The verified field conditions have been used for the purposes of this assessment.*

The subject site is described as a very long property consisting of a 2-storey, low-rise apartment building that has been legally established for several decades within an urban mixed-use commercial and residential corridor. The property is located along St. Clair Street within the City of Chatham, Ontario and comprises two connected buildings. The front building, 220 St. Clair Street, is zoned Highway Commercial and is mixed use, containing the commercial units at grade with residential units above, served by the front parking lot. The rear building, 222 St. Clair Street, is zoned Residential Low Density and contains the balance of the residential units, served by the rear parking area.

Figure 1 illustrates the location of the subject site and associated parking configuration.

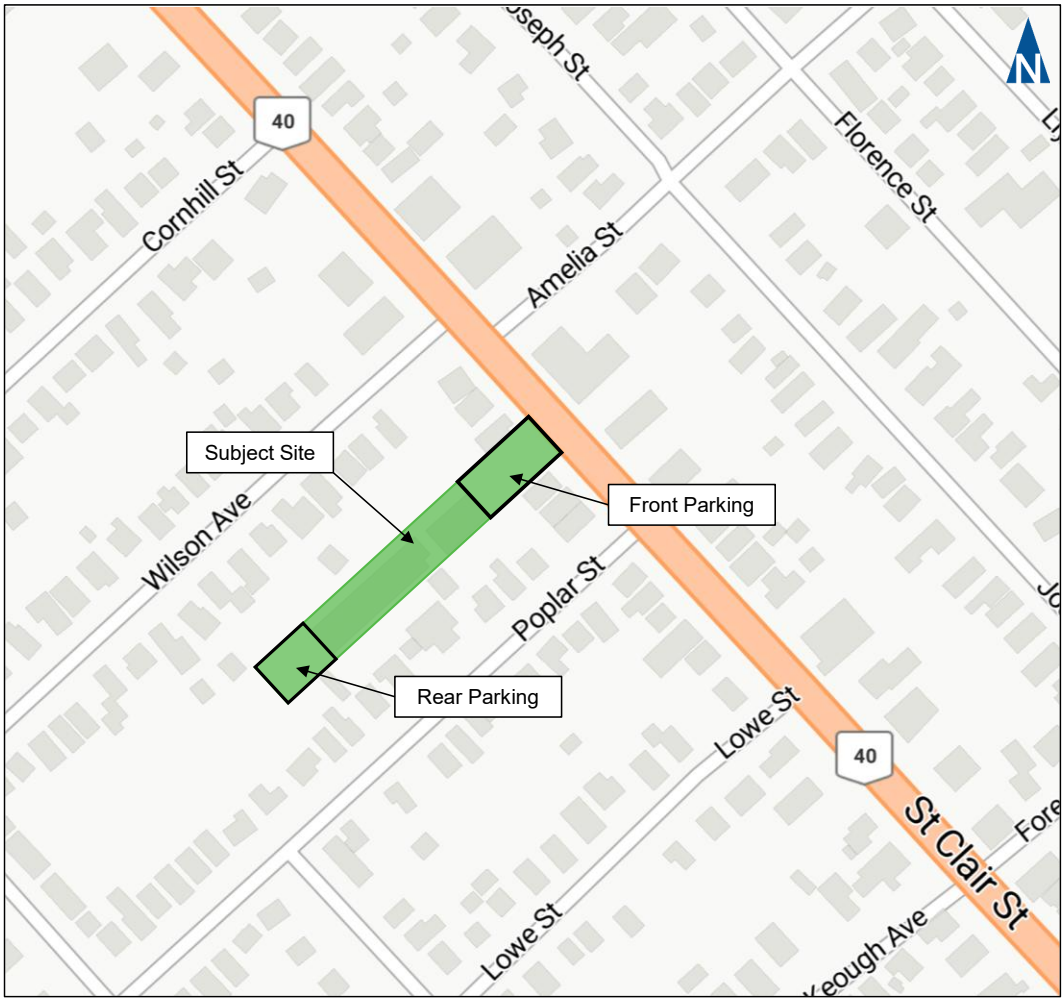


Figure 1 - Location of Subject Site

2.2. Transportation Context

Existing access to the site is provided via St. Clair Street and is provided with one direct driveway access to an existing surface parking area located on the northeast side of the building with frontage to St. Clair Street. The rear of the building contains the existing apartment building with a drive aisle connecting the north side of the property to the rear where dedicated parking for rear residential units is provided. The entire property currently provides approximately 27 surface parking spaces between the front and rear parking areas, which serve both residents and visitors alike and overlaps with the commercial operations at the front of the property.

An additional access is provided to the northwest via connected parking lots at the rear of all the properties fronting St. Clair Street and provides a second auxiliary access to Wilson Street in the north. **Figure 2** depicts the site access arrangement.



Figure 2 – 220-222 St. Clair Street Site Access

2.2.1. Existing Parking

As noted above, the existing parking supply has been confirmed through field verification and parking utilization surveys to be approximately 27 spaces, split between a front and a rear parking area. The 27 spaces serve 21 dwelling units and two commercial units, being Unit 1A at 264.43 m2 and Unit 1B at 49.42 m2 (**Appendix B**). Unit 1B has been vacant throughout and has no recorded history of use. Under Section 4.19(r) the existing building generates a residential requirement of 26 spaces. The commercial requirement depends on the use established. At the rate applicable to a use not specified in Section 4.19(r), being 1 space per 27.87 m2, the two commercial units generate 10 spaces, for a total

requirement of 36 spaces and an existing deficiency of 9 spaces. Assessed at the Personal Service Establishment rate of 1 space per 9.29 m2 for both spaces, which reflects the use currently operating in Unit 1A being the Oasis, a health and beauty spa, the commercial requirement rises to 33 spaces, for a total requirement of 59 spaces and a deficiency of 32 spaces. **Table 1** summarizes the existing site conditions across that range.

Table 1 - Summary of Existing Site Conditions

Property Details	220 St. Clair Street
Total Dwelling Units	21
Commercial Unit 1A	264.43 m^2
Commercial Unit 1B (vacant)	49.42 m^2
Total Parking Spaces	27
Residential By-law Parking Requirement (Section 4.19r)	26 spaces
Commercial By-law Parking Requirement (Section 4.19r)	10 to 33 spaces
Total By-law Parking Requirement	36 to 59 spaces
Existing Deficiency (lower to upperbound)	-9 to -32 spaces

Note: The By-law rate applicable to a Personal Service Establishment (PSE) materially overstates parking demand at this property and represents the upper bound of the Commercial requirement and already shows a rate in excess of the current provided parking (33 vs. 27). The lower bound is the rate applicable to a use not specified in Section 4.19(r). For purposes of this assessment, the lower bound was used since the PSE rate significantly surpasses parking availabilty and would indicate a substantial deficiency under existing conditions.

2.2.1. On-Street Parking

The Municipality of Chatham-Kent Parking by-laws do not explicitly state any restrictions to on-street parking and therefore it is assumed on-street parking is permitted and subject to enforcement upon community complaints, and if parking is observed longer than 24-48 hours. With respect to the subject site, on-street parking is available on the north side of Poplar Street, the south side of Wilson Avenue and on the south side of Amelia Street. St. Clair Street does not permit parking as it is a main arterial roadway.

Figure 3 depicts the on-street parking permissions within vicinity of the site.



Figure 3 – On-Street Parking Permitted Adjacent to Site

2.2.2. Public Transit

Public transit is accessible immediately in front of the site on St. Clair Street at the corner of Poplar Street heading northbound in a one-way loop away from downtown via Route 2. A secondary route is located approximately 300 metres away to the west at the corner of Wilson Avenue and Sheldon Avenue heading southbound in a one-way loop towards downtown via Route 1. Both these routes offer bi-directional servicing to and from the Downtown Transfer Terminal at 100 Wellington Street West and are within immediate access to the subject site, offering services with 30 minute headways starting at 6:15 am.

With walking to the bus stop, travel from the subject to the Downtown Transfer Terminal is approximately 11 minutes away by bus, and the return trip is approximately 5 minutes. Within both these estimates, the bus travel time is only 4 minutes in either direction.

Figure 4 outlines the bus routes in relation to the subject site.

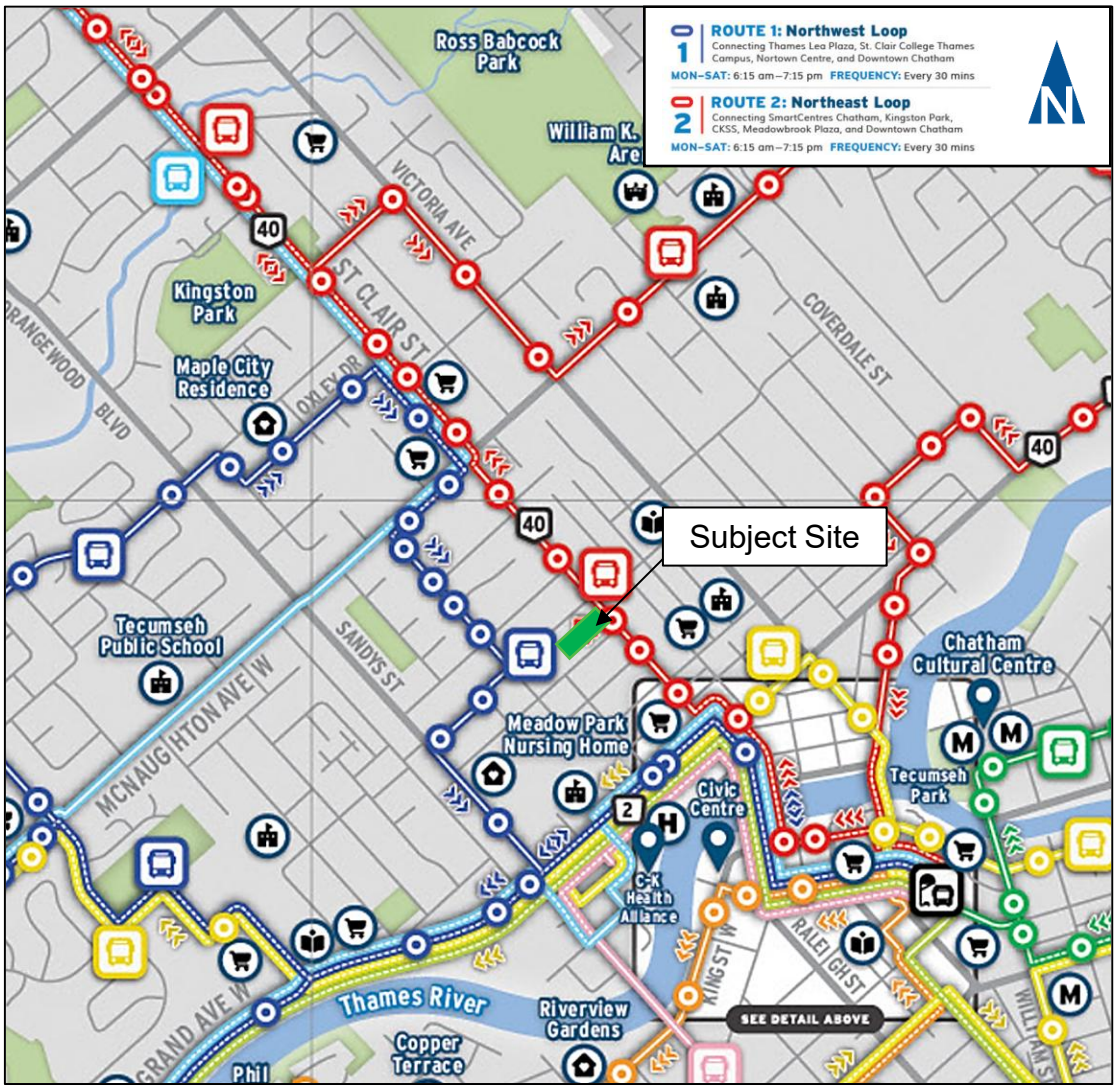


Figure 4 – Public Transit Route – Chatham Conventional Routes 1 (Blue) and 2 (Red)

2.2.3. Cycling Network

Cycling is accessible within vicinity of the site via the Community Loop along Victoria Avenue denoted by the purple linework, and offers direct connection to the downtown core via a paved network. In addition, there are currently bike lanes denoted on various corridors within Chatham, most notably within proximity of the site is the bike lanes along Sandys Street from the rear of the property, which can be accessed by Wilson Avenue to the north of the site.

Both these corridors offer protected cycling facilities for residents to take advantage. The community loop is approximately 380 metres away to the east and the protected lanes are ~660 metres away to the west from the front of the property. Given the availability of these facilities, it is not unreasonable to anticipate future growth and more cycling paths to open up within the City, offering an alternative mode of travel that is fairly accessible to the residents of 220 St. Clair Street.

Figure 5 outlines the Chatham cycling network within proximity of the site.

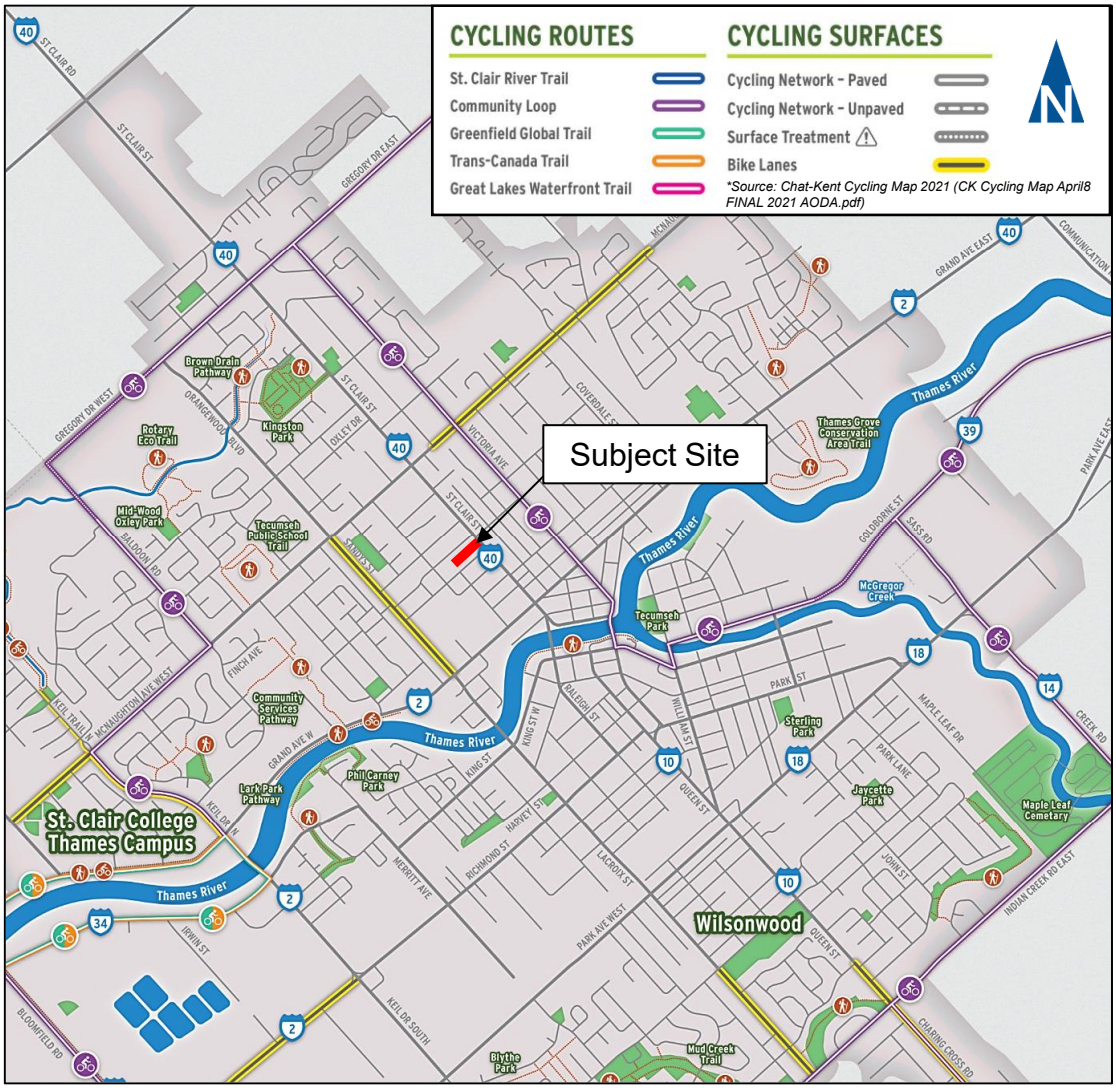


Figure 5 – Chatham-Kent Cycling Map 2021

3. OBSERVED PARKING DEMAND

In an effort to quantify the current operations, existing traffic counts were conducted, reviewed, and the existing parking supply was assessed. Traffic counts were undertaken on March 15 and March 16, 2026, over two consecutive days, to capture both weekend and weekday conditions. The surveys consisted of 24-hour observations, allowing for a detailed assessment of parking occupancy and utilization, with particular emphasis on overnight conditions to reflect resident parking demand.

Table 2 summarizes the observations. **Table 3** presents the results by survey day. The detailed traffic count data along with site photos are provided in **Appendix C**.

Table 2 - Summary of Existing Parking Conditions (220 St. Clair Street)

Parameters	Value
Dwelling Units	21 (26 spaces)
Commercial Unit 1A	264.43 m^2 (9 spaces)
Commercial Unit 1B	49.42 m^2 (1 space)
Total Parking Spaces	27 spaces
By-law Parking Requirement (Section 4.19r)	36 spaces
Existing Deficiency	-9 spaces
Existing Residential Parking Spaces	18 (27–9)
Existing Residential Parking Ratio	0.86 spaces/unit
Maximum Occupancy	8 vehicles
Typical Daytime Occupancy Range	2-7 vehicles
Overnight Occupancy	2-8 vehicles
Peak Utilization of Existing Supply	30%
Observed Resident Parking Demand (Overnight):	**0.10-0.38 veh/unit**

Peak parking occupancy across the two-day survey was 8 vehicles, recorded overnight on the Sunday. This equates to 30 percent of the existing 27-space supply, with 19 spaces vacant at the peak. Occupancy did not exceed 8 vehicles at any point during the survey.

Table 3 - Observed Parking Conditions by Survey Day

Parameters	Sun. Mar 15	Mon. Mar 16	48 Hours
Vehicles In	13	85	98
Vehicles Out	15	89	104
Total Vehicle Movements	28	174	202
Peak Occupancy (vehicles)	8	6	8
Minimum Occupancy (vehicles)	4	2	2
Average Occupancy (vehicles)	6.3	4.2	5.2
Overnight Occupancy (23:00 - 06:00)	6 - 8	2 - 6	2 - 8
Daytime Occupancy (07:00 - 22:00)	4 - 7	2 - 6	2 - 7

The two survey days exhibit distinct operating characteristics:

- Sunday: 28 vehicle movements against occupancy of 4 to 8 vehicles.
- Monday: 174 vehicle movements against occupancy of 2 to 6 vehicles, peaking at 24 movements in the hour ending 14:00, with 76 entries and 75 exits between 07:00 and 17:00.

Weekday daytime movements reflect high-turnover, short-dwell commercial activity that does not accumulate as stored parking demand. Overnight occupancy is accordingly carried forward as the measure of resident parking demand. Overnight occupancy, being the period most representative of resident parking demand, ranged between 2 and 8 vehicles, equating to approximately 0.10 to 0.38 vehicles per total dwelling unit. The By-law requirement for the existing building is 35 spaces, being 26 for the residential component and 9 for the commercial component. Peak observed occupancy of 8 vehicles is 23 percent of that requirement. No instances of parking spillover to adjacent streets were observed during the survey period.

*Note: a portion of the dwelling units were unoccupied at the time of survey and therefore generated no resident parking demand. The influence of tenancy conditions on the observed demand rates is examined in **Section 4**.*

4. OCCUPANCY-ADJUSTED PARKING DEMAND (SENSITIVITY ANALYSIS)

4.1. Purpose of the Sensitivity Analysis

The observed parking demand summarized in **Section 3** is expressed relative to the total number of dwelling units at the subject site. At the time of the March 2026 surveys, a portion of the units at 220 St. Clair Street were unoccupied and therefore generated no resident parking demand. Expressing observed demand against the total unit count consequently understates the parking demand attributable to each tenanted unit.

A sensitivity analysis has accordingly been undertaken in which observed overnight parking demand is expressed relative to the number of occupied dwelling units at the time of survey. Tenancy status has been confirmed through property management records dated July 20, 2026, which identify occupancy, vacancy, and lease commencement and termination dates on a unit-by-unit basis. Rent levels and lease charges have not been reproduced in this report. A summary of unit-level occupancy is provided in **Appendix D**.

Two comparable proxy sites have also been assessed to provide a larger sample and to test whether the occupancy-adjusted rate derived at the subject site is representative of this housing form. The proxy sites are 9 Sarah Crescent, and 43 and 49 Taylor Avenue, both located within Chatham, the latter treated as one combined site due to a shared parking arrangement. MDT Urban Traffic Solutions Ltd. undertook parking utilization surveys at both proxy sites on the same dates and using the same methodology as at the subject site, and the observations reported herein are drawn directly from those surveys. Both proxy sites share the same low-rise apartment form, tenure, and municipal context as the subject site, and each is the subject of a separate report prepared by MDT.

*Note: This analysis addresses the residential parking component only. Demand is assessed over the overnight period, being the period most representative of resident vehicle ownership, during which the commercial component of the property generates no parking demand. The parking requirement and observed demand associated with the commercial unit are addressed separately in **Section 7**, and the interaction between the two components is quantified in the shared parking assessment in **Section 7.3**.*

4.2. Occupancy at Time of Survey

At 220 St. Clair Street, 7 of the 21 residential dwelling units were occupied at the time of the March 15 and March 16, 2026 surveys, representing an occupancy rate of approximately 33 percent. The commercial unit (Unit 1A) at Level 1 was occupied throughout, under a lease commencing June 2023

and expiring May 2028, however, since it operates daytime hours, it does not contribute to the residential parking demand discussed here-in and has thus been deferred to **Section 6**.

At 9 Sarah Crescent, 6 of 12 units were occupied, representing 50 percent. At 43 and 49 Taylor Avenue, 25 of 42 units were occupied, representing approximately 60 percent. The three properties were surveyed under broadly comparable tenancy conditions, with occupancy rates ranging from approximately 33 to 60 percent. Occupancy at the three sites is summarized in **Table 4**.

Table 4 - Occupancy Status at Time of Survey (March 2026)

Site	Total Units	Occupied Units	Vacant Units	Occupancy Rate
220 St. Clair Street (subject)	21	7	14	33%
Proxy Site: 9 Sarah Crescent	12	6	6	50%
Proxy Site: 43 & 49 Taylor Avenue	42	25	17	60%

4.3. Occupancy-Adjusted Demand Rates and Observed Utilization

Applying the observed overnight parking occupancy to the number of occupied units yields the adjusted demand rates summarized in **Table 5**, together with the parking supply at each site, the proportion of that supply occupied at the overnight peak, and the number of vehicles recorded above the occupied unit count at that peak.

Table 5 - Occupancy-Adjusted Overnight Parking Demand and Observed Utilization

Site	Occ. Units	Parking Supply	Overnight Occ. (veh.)	Excess Veh. Overnight vs. Tenants	Parking Util.	Rate per Occ. Unit	Design Rate
220 St. Clair Street	7	27	2 - 8	+1	30%	0.29 - 1.14	0.71
Proxy Site: 9 Sarah Crescent	6	14	4 – 8	+2	57%	0.67 - 1.33	1.00
Proxy Site: 43 & 49 Taylor Avenue	25	44	20 – 25	0	57%	0.80 - 1.00	0.90
Average of Sites	–	–	–	–	–	–	**0.87**

Overnight parking utilization was 30 percent at 220 St. Clair Street, 57 percent at 9 Sarah Crescent and 57 percent at the Taylor Avenue proxy site. The supply recorded for 220 St. Clair Street is the whole-site supply, available to residents in full overnight as the commercial unit generates no demand at that time; the proxy sites are residential only. Each site operates an independent parking supply. No spillover to adjacent streets was observed at any site.

At the overnight peak, vehicles exceeded occupied dwelling units at two of the three sites, by one at 220 St. Clair Street and two at 9 Sarah Crescent, with no excess at the Taylor Avenue proxy site. The excess is not resident vehicle ownership at one vehicle per unit, and represents either second vehicles within households or overnight visitor activity, which the surveys do not distinguish.

The sample at the subject site is small at seven occupied units, such that a single vehicle alters the calculated rate by approximately 0.14 vehicles per unit. The proxy sites provide a further thirty-one occupied units under directly comparable conditions.

4.4. Adopted Design Rate

The average of the two overnight survey periods yields 0.71 vehicles per occupied unit at 220 St. Clair Street, 1.00 at 9 Sarah Crescent and 0.90 at 43 and 49 Taylor Avenue. Weighting by occupied unit

count yields 0.88, and the Taylor Avenue proxy alone, the largest sample, yields 0.90, all within 0.03. A design rate of 0.87 vehicles per occupied dwelling unit is adopted and carried forward to **Section 5**.

The upper bound of each range has not been adopted. Weighted by occupied units it equates to 1.08 vehicles per occupied unit, or approximately 52 vehicles at 48 units. It represents the higher of two survey nights on samples of six and seven occupied units, where a single vehicle alters the rate materially; at the Taylor Avenue proxy, with 25 occupied units, the range narrows to 0.80 to 1.00.

The adopted rate is therefore conservative. It assumes full tenancy of all 48 units, no reduction in vehicle ownership from the conversion to bachelor-style units, and no reduction from the transit service in front of the site.

5. PROJECTED RESIDENTIAL PARKING DEMAND (PROPORTIONAL GROWTH ANALYSIS)

To assess the anticipated residential parking demand associated with the proposed development, a proportional growth analysis has been undertaken based on the occupancy-adjusted parking utilization derived in **Section 4**. Applying the adopted design rate of 0.87 vehicles per occupied dwelling unit to the proposed development of 4 dwelling units at full occupancy results in an estimated parking demand of approximately 42 vehicles.

Table 6 summarizes the proportional demand from existing to full occupancy.

Table 6 – Proportional Parking Demand (0.87 spaces/occupied unit)

Scenario	Unit Count	Total Parking
Existing (7 of 21 occupied)	21	**8**
Proportional (full occupancy)	48	**42**

Against the existing supply of 27 spaces, the projected demand of approximately 42 vehicles indicates that the current parking provision would be materially deficient at full build-out if no changes were made to the site layout. The following section addresses the optimization of the existing layout.

*Note: this analysis assumes a direct proportional increase in vehicle ownership relative to unit count, and is conservative, as it does not account for factors that may reduce per-unit vehicle ownership in practice, including smaller unit sizes and changing travel behaviour. This is further evaluated in **Sections 8** and **9**.*

6. PROPOSED PARKING OPTIMIZATION

Based on the projected residential parking demand of approximately 42 vehicles identified in **Section 5**, the existing parking layout was reviewed and reconfigured to improve efficiency and increase the overall parking supply.

6.1. Parking Design Guidance Review

The proposed parking layout has been developed in accordance with the Municipality of Chatham-Kent Zoning By-law 216-2009 (Updated April 2026), specifically the general parking provisions under Section 4.19. The following design parameters were applied:

- Minimum perpendicular stall width: 2.75 m;
- Minimum two-way drive aisle width: 6.1 m; and
- Perpendicular stall depth: 5.5 m.

6.2. Accessible Parking

Two accessible parking spaces are provided, satisfying the minimum requirement of Ontario Regulation 191/11 (Integrated Accessibility Standards) under the Accessibility for Ontarians with Disabilities Act, 2005, Section 80.36, being four percent of the total supply for a facility of this size.

- A Type 'A' space, 3.4 m wide by 5.5 m long, is provided in the front parking area adjacent to the commercial entrance; and
- A Type 'B' space, 2.75 m wide by 5.5 m long, is provided in the rear parking area, served by the existing 1.98 m pedestrian walk aisle against the rear building wall, which exceeds the 1.5 m minimum access aisle width.

Both accessible spaces have been accommodated within the proposed layout without the loss of any standard parking space. The Type 'B' space is sized for accessible use and is available as a general residential space; it would be signed and designated for accessible use when a tenant requires it.

6.3. Waste Disposal

The proposed layout reflects the existing waste disposal arrangement and does not reduce the area presently used for that purpose. Currently waste disposal trucks drive into the rear and access a waste bin at the rear of the property as depicted in **Figure 6**.



Figure 6 – Existing Waste Disposal Bin Located at Rear of the Property

In order to improve operations and maximize parking, the bin will be relocated to the entrance of the rear driveway aisle, so that a garbage truck can simply drive and reverse from the property, or continue into the rear parking lot and turn around to exit.

6.4. Site Loading

According to the Chatham-Kent Zoning By-law, site loading is not required for residential buildings, and none is provided, reflecting existing conditions. Residents are assumed to move in and out of the property using the existing parking spaces using cube vans for infrequent moving and unloading operations.

6.5. Optimized Parking Layout

Through the application of the above design criteria, the parking layout has been reconfigured to maximize efficiency while maintaining safe and functional circulation throughout the site. The proposed layout provides a total of 38 parking spaces, an increase of 11 spaces, or approximately 41 percent, over the existing supply of 27 spaces. **Table 7** summarizes the proposed parking supply.

Table 7 - Proposed Parking Supply by Area

Parking Area	Standard Spaces	Acc. Spaces	Total
Front (St. Clair Street frontage)	19	1 (Type 'A')	20
Rear	17	1 (Type 'B')	18
Total Proposed Supply	**36**	**2**	**38**

The layout retains the existing dual-access arrangement, with the primary driveway to St. Clair Street and the auxiliary connection to Wilson Street through the shared rear parking areas. The rear drive aisle connecting the two parking areas is maintained, allowing vehicles to circulate through the site without reversing onto St. Clair Street.

Figure 7 and **Figure 8** illustrate the front and rear proposed parking plan for the property. The full parking plan is provided in **Appendix E**.

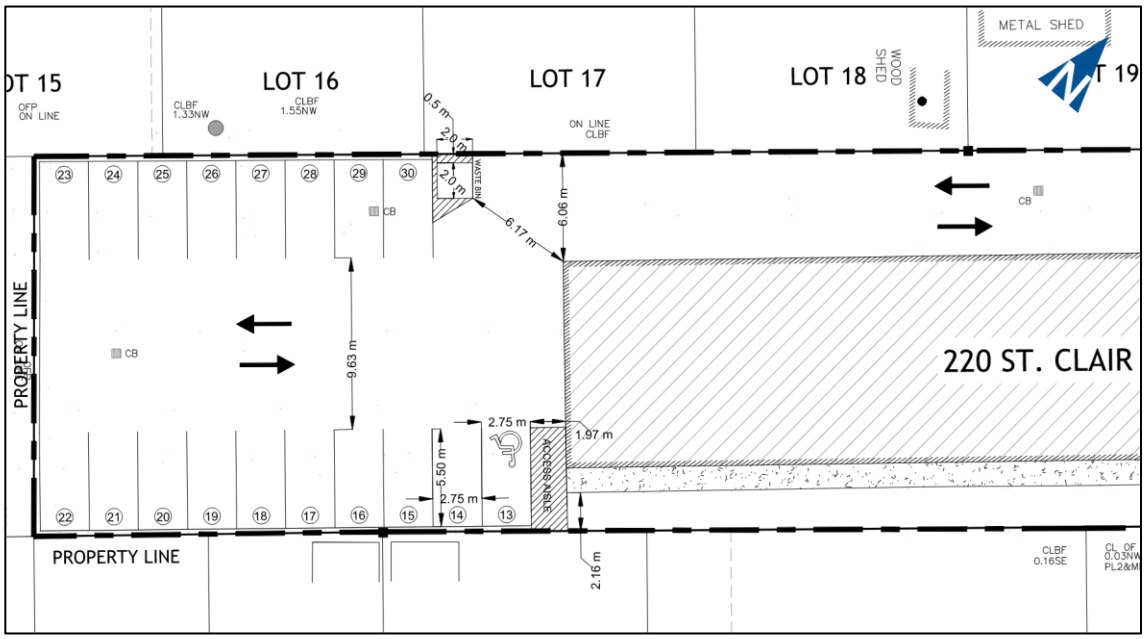


Figure 7 - Proposed Parking Plan (Rear of Property)

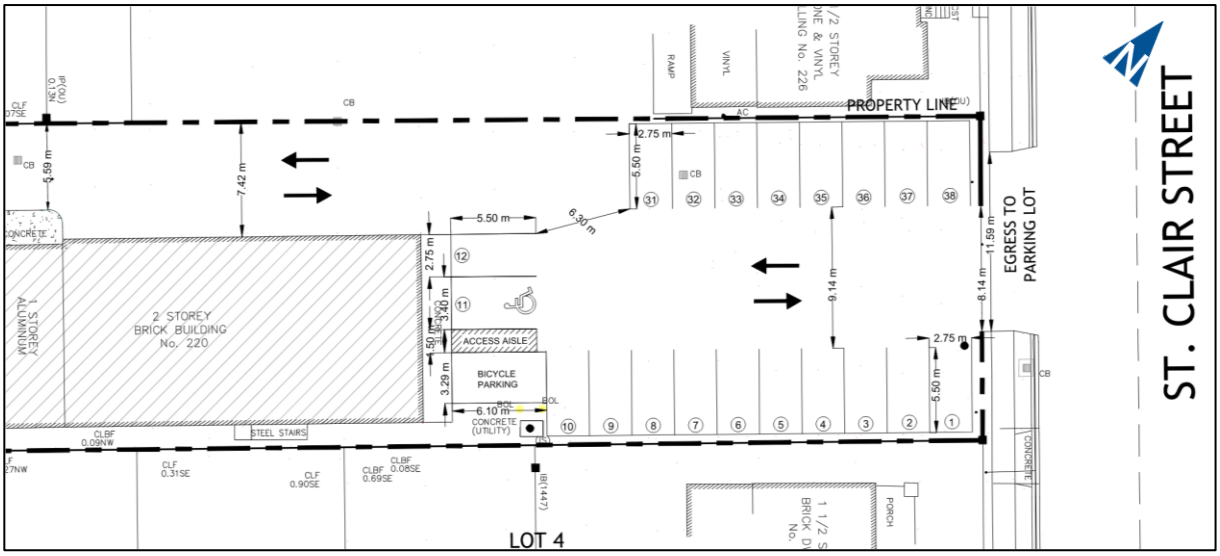


Figure 8 - Proposed Parking Plan (Front of Property)

6.6. Proposed Parking Supply and Conclusion

The proposed development will contain 48 dwelling units and 38 parking spaces, a parking ratio of approximately 0.79 spaces per unit. Of that supply, 9 spaces are required for the commercial component under Section 4.19(r), leaving 29 spaces available to the residential component, being 0.60 spaces per dwelling unit. The allocation is set out in **Section 10**. The projected parking demand of 42 vehicles identified in **Section 5** exceeds the residential supply.

Three factors establish that the proposed supply is adequate for the unit form proposed:

1. the design rate of 0.87 vehicles per occupied unit is derived from proxy sites comprising one and two-bedroom units, whereas the proposed units are bachelor units, for which observed and regulated parking rates indicate a demand of 18 to 26 vehicles at 48 units, as set out in **Sections 8** and **9**.
2. the observed weekday data demonstrate that the commercial and residential components of the site peak at different times, such that the front parking area retains capacity overnight when residential demand is at its maximum.
3. on-street parking is permitted on the north side of Poplar Street, the south side of Wilson Avenue and the south side of Amelia Street and is available for intermittent visitor activity. No on-street capacity is relied upon to meet resident parking demand.

The layout has been designed to meet the applicable dimensional standards of the Zoning By-law and to provide adequate maneuvering space. No operational or circulation constraints have been identified that would preclude the safe and efficient use of the proposed parking supply.

7. COMMERCIAL PARKING DEMAND ASSESSMENT

7.1. Commercial Component and Anticipated Use

The subject property retains a commercial component at the front of the building. Two commercial units were historically established, being Unit 1A at 264.43 m2 at grade and Unit 1B at 49.42 m2. Unit 1B has been vacant throughout with no recorded history of use and is proposed to be converted to

residential use within the 48 dwelling units. Unit 1A is retained, is not within the scope of the proposed alterations, and no change to its floor area is proposed. Unit 1A is currently operated by Oasis, a health and beauty spa. The unit is capable of falling within the definition of a Personal Service Establishment under the Zoning By-law. Its operating characteristics, however, are those of an appointment-based use served by treatment rooms rather than a high-turnover walk-in service shop, and align with the Office and Retail Store use categories for parking purposes. The parking basis adopted for the unit is set out in **Section 7.2**.

Table 8 summarizes the commercial components. The parking implications of a change of use within the commercial unit are examined in **Section 7.2**.

Table 8 - Commercial Component Summary

Unit	Use	Zoning Category	Status at Survey	Gross Floor Area
1A	Oasis - health and beauty spa	Personal Service Establishment	Occupied (lease June 2023 - May 2028)	264.43 m2
1B	Vacant, no recorded history of use	Not established	Vacant, proposed conversion to residential	49.42 m2

7.2. Commercial Parking Requirement

Section 4.19(r) requires the residential and commercial parking requirements of a Mixed Use Commercial/Residential Building to be calculated as the sum of the individual requirements for each non-residential use and the dwelling use. The By-law makes no provision for shared parking between the components and no reduction is available where they peak at different times. In computing the requirement, no regard is had for any fraction or part of a whole number.

Unit 1A operates as a Personal Service Establishment. Assessed at the rate prescribed for that use, being 1 space per 9.29 m2 of gross floor area, the requirement at 264.43 m2 is 28 spaces. As set out in **Section 2.2.1**, that rate is not reflective of how the unit functions and materially overstates the demand it generates. The unit is accordingly assessed at 1 space per 27.87 m2 of gross leasable floor area, being the rate prescribed for any use not specified in Section 4.19(r) and the rate consistent with the operating characteristics observed in the parking counts. Applied to the surveyed floor area, the requirement is 9 spaces. **Table 9** sets out the requirement generated by each commercial use in the zone at this floor area.

Table 9 - Parking Requirement by Permitted Commercial Use (Section 4.19(r))

Commercial Use	By law Rate	Spaces Required	Verdict
Any use not specified in Section 4.19(r)	1 per 27.87 m2 GLFA	9	**Permitted Use**
Office	1 per 27.87 m2 GLFA, min. 6	9	**Permitted Use**
Retail Store / Retail Store - Convenience	1 per 27.87 m2 GLFA, min. 5	9	**Permitted Use**
Bank / Financial Institution	1 per 18.58 m2 GLFA, min. 10	14	Not Supported
Personal Service Establishment	1 per 9.29 m2 GFA (overstated, defer to any use not specified rate)	28 (9)	**Applicable Use** (see above 7.2)
Eating Establishment	1 per 4.64 m2 public GFA, min. 10	56	Not Supported
Eating Establishment - Take-out	1 per 2.30 m2 public GFA, min. 10	114	Not Supported

It is recommended that any relief granted be conditioned so as to limit the commercial unit to the uses identified in **Table 9** as falling within the permitted or applicable uses.

7.3. Observed Commercial Parking Demand

The commercial component was in operation throughout the parking utilization surveys, Unit 1A having been occupied continuously since June 2023. The observed data summarized in **Section 3** therefore represent the combined demand of the residential component and the operating Personal Service Establishment. Weekday commercial activity at the site was observed to be high-turnover and short-dwell. Between 07:00 and 17:00 on Monday March 16, 2026, 76 vehicles entered the site and 75 exited, while no more than 6 vehicles were parked anywhere on the property at any one time.

The counts record movements at the site driveway and do not identify vehicles by user. Commercial demand has accordingly been taken as the full weekday peak of 6 vehicles, which is conservative in that it includes any residential vehicles parked at the same time. The adopted requirement of 9 spaces exceeds that figure by half again. Assessed at the Personal Service Establishment rate of one space per 9.29 m2, the requirement would be 28 spaces, being 4.7 times the demand observed with the unit in operation and more than three times the maximum occupancy of 8 vehicles recorded across the entire property over two consecutive 24-hour surveys. A high-turnover personal service operation would not be supportable at this site. The operation observed is not of that character.

Time-of-day factors have been derived from the site's own survey data rather than from generic published profiles. The Sunday survey, when commercial activity at the site was negligible, provides the residential profile at weekends and in the evening. The Monday survey records residential occupancy falling from six vehicles overnight to a floor of two vehicles through business hours, giving a weekday daytime residential factor of 0.33.

Commercial demand has been taken as the full weekday peak of 6 vehicles as set out in **Section 7.3**. **Table 10** applies these factors to the residential design demand of 42 vehicles defined in **Section 5**.

Table 10 - Shared Parking Assessment - Combined Peak Demand

Period	Residential Factor (site observed)	Residential Demand (of 42)	Commercial Demand	Combined Demand
Weekday overnight (23:00 - 06:00)	1.00	42	0	42
Weekday daytime (08:00 - 17:00)	0.33	14	6	20
Weekday evening (18:00 - 22:00)	0.70	29	2	31
Weekend daytime (09:00 - 17:00)	0.68	29	3	32
Peak Parking Demand				**42**

*Note: the time-of-day factors are derived from surveys undertaken at 33 percent residential occupancy. The commercial unit was in operation throughout. The residential demand applied is the proportional figure from **Section 5**, derived from proxy sites comprising one and two-bedroom units.*

The combined peak parking demand is 42 vehicles, occurring overnight on a weekday when commercial demand is zero. The commercial component contributes nothing to the design peak. Weekday daytime demand, when the commercial component is at its busiest, is approximately 20 vehicles, being approximately 50% of the overnight peak.

Note: the counts were undertaken at the St. Clair Street driveway. Vehicles cutting through the property between St. Clair Street and Wilson Street would produce a systematic imbalance between entries and exits at the counted driveway and an upward drift in derived occupancy. No such drift is present. Entries and exits were within four

movements of each other on the Monday, and occupancy closed below its opening value on both survey days, indicating that through-movements at the counted driveway were not material. Movements confined to the shared rear parking areas and the Wilson Street access would not be captured by the count.

7.4. Combined Parking Requirement and Parking Relief

The existing building was legally established prior to the date of the passing of the Zoning By-law. Under Section 4.19(r) it generates a requirement of 36 parking spaces, being 26 spaces for the 21 residential units and 10 spaces across Units 1A and 1B at the adopted rate. The existing supply of 27 spaces is deficient by 9 spaces. Section 4.23 deems a building in that position to comply with the By-law, and the existing deficiency has accordingly stood as a lawful condition since the By-law was passed.

Section 4.23 permits such a building to be enlarged, extended, reconstructed, repaired or renovated only where the work does not further reduce its compliance with the provision to which it does not conform. The proposed conversion increases the requirement from 36 spaces to 69 while increasing the supply from 27 spaces to 38. The appropriateness of the resulting standard is addressed through the zoning by-law amendment.

Section 4.19(b) provides independently that where the intensity of use of a building is increased through the addition of dwelling units, off-street parking is to be provided for the whole building or structure in accordance with the current requirements. The requirement has accordingly been recalculated across both the residential and commercial components, as set out in **Table 11**.

Table 11 - Combined By-law Parking Requirement

Component	Basis (Section 4.19(r))	Existing (21 units)	Proposed (48 units)
Residential	1.25 spaces per unit	26	60
Commercial Units 1A and 1B	1 space per 27.87 m2 GFLA	10 (1A and 1B)	9 (1A only)
Total By-law Requirement	per above	36	69
Proposed Parking Supply	-	27	38
Deficiency/Relief Sought	**-**	**-9**	**-31**

The residential requirement is calculated at 1.25 spaces per unit with fractions disregarded under Section 4.19(r), being 26 spaces for the 21 existing units and 60 spaces for the 48 proposed units. The commercial requirement is derived in **Section 7.2**, being 10 spaces across Units 1A and 1B under existing conditions and 9 spaces for the retained Unit 1A under the proposal. Relief is sought for 31 spaces, of which 9 spaces are the pre-existing deficiency and 22 spaces are attributable to the proposed conversion. The conversion of Unit 1B from commercial to residential use is a net reduction in the commercial requirement. The proposal increases the parking supply by 11 spaces, or approximately 41 percent, against an increase of 33 spaces in the calculated requirement. The shortfall arises because the additional dwelling units increase the requirement by more than the supply is increased, and because Section 4.19(r) treats the residential and commercial components additively, assuming both require parking concurrently. The survey data establish that they do not, and that relationship is quantified in **Section 7.3**.

8. COMPARATIVE PARKING STANDARDS REVIEW

8.1. Municipality of Chatham-Kent

The Municipality's current Zoning By-law requires a parking rate of 1.25 spaces per dwelling unit for apartment housing. Applied to the proposed 48-unit development this results in a requirement of 60 spaces for the residential component. Together with the retained commercial unit (9 spaces) the combined requirement is 69 spaces against a proposed supply of 38 spaces.

The By-law rate can be tested against the existing building, which was legally established prior to the passing of the By-law and is deemed to comply under Section 4.23. The building provides 27 spaces for 21 dwelling units and two commercial units. At the adopted rate the commercial units generate 10 spaces, of which 9 relate to the occupied Unit 1A, leaving 18 spaces for the residential component against a residential requirement of 26 spaces, and a total requirement of 36 spaces.

Measured against observed conditions, the commercial unit occupied no more than 6 spaces on a weekday, taking the whole of the weekday peak as commercial use to be conservative. The residential component, at the design rate of 0.87 vehicles per occupied unit derived in **Section 4** and applied to all 21 existing units, generates 18 vehicles. That figure corresponds to the 18 spaces which remain once the commercial allocation is applied. The two components total 24 spaces against a By-law requirement of 36, and they do not peak concurrently: the residential peak occurs overnight when the commercial unit is closed, giving an actual peak of 18 vehicles against the 27 spaces provided.

The By-law requires 36 spaces for a building that at full tenancy peaks at 18. The rate substantially overstates parking demand at this property under conditions that have existed for decades, and the existing 9-space deficiency has produced no observed spillover to adjacent streets. The proposed rate results in 0.79 spaces per dwelling unit and reflects the observed parking performance of the site, adjusted for the tenancy conditions present at the time of survey, together with the increased capacity achieved through the optimized layout.

8.2. Comparable Municipalities

Broader municipal trends indicate a shift toward reduced parking requirements for apartment housing. Reduced rates in the range of approximately 0.5 to 1.0 spaces per unit are commonly applied across Ontario, depending on location, unit characteristics, and development context. Rates for bachelor units are lower still, reflecting the relationship between unit size and vehicle ownership. For example, the City of Sarnia has identified reduced parking rates as low as approximately 0.75 spaces per unit through its ongoing zoning review. This reflects growing recognition that traditional parking standards may overestimate actual vehicle ownership and demand.

Note: the City of London increased its minimum parking requirement for apartment dwellings from 0.5 to 1.0 spaces per unit under Zoning By-law Amendment Z-26042, adopted by Council July 21, 2026. The amended requirement does not apply to properties subject to an affordable housing agreement with the City.

Table 12 summarizes the comparative rates applied to the proposed 48 units.

Table 12 - Comparative Municipal Parking Standards

Municipality	Development Type	Resident Rate (per unit)	Visitor Rate (per unit)	Spaces Required (48 units)
Chatham-Kent	Current Zoning By-law (Apartments)	1.25	Not specified	60
Sarnia	Current Zoning By-law (Apartments)	1.25	Not specified separately	60
Sarnia	City of Sarnia Zoning By-law Update – Apartments	1.0	0.2	57.6
London	Apartment Building (as amended)	1.0	Not specified separately	48
Sarnia	City of Sarnia Zoning By-law Update – Affordable Housing	0.75	Not specified separately	36
Toronto	Apartment Building (Bachelor <45 m^2, PA1 Zone)	0.3	0.1	19.2
Toronto	Assisted / Affordable Housing (Bachelor <45 m^2, PA1 Zone)	0.12	0.1	10.6
	Proposed Parking Supply:	**0.79**	**Inclusive**	**38**

The proposed rate of 0.79 spaces per unit falls within the range of accepted contemporary standards and is well above the rates applied by the City of Toronto to bachelor units of the form proposed.

9. INDUSTRY BENCHMARKING – ITE PARKING GENERATION

In addition to municipal regulatory standards and comparable municipal practices, industry parking generation data was reviewed to provide further benchmarking context for the proposed parking supply. The Institute of Transportation Engineers (ITE) Parking Generation Manual, 6th Edition compiles observed parking utilization data from surveyed developments across North America. These rates represent empirical averages based on field studies, not prescriptive requirements, but rather technical benchmarks of observed parking demand.

For comparative purposes, the following ITE land use categories were reviewed:

- Land Use Code 217 - Multifamily Housing, 1 Bedroom (Low-Rise), Not Close to Rail Transit, Dense Multi-Use Urban
- Land Use Code 223 - Affordable Housing (Income Limits), Dense Multi-Use Urban, assessed per bedroom

Table 13 summarizes the applicable parking generation rates.

Table 13 - ITE Parking Generation Rates (6th Edition)

ITE Parking Rate	Land Use	Rate	Spaces Required (48 units)
Multifamily Housing - 1 BR (Low-Rise 217) - Not Close to Rail Transit, Dense Multi-Use Urban	Low-Rise 217	0.55 per unit	26
Affordable Housing - Income Limits 223, General Urban/Suburban	Income Limits 223	0.55 per bedroom	26
Affordable Housing - Income Limits 223, Dense Multi-Use Urban	Income Limits 223	0.37 per bedroom	18
	Total Proposed Supply:	**0.79**	**38**
	Available to Residential Use	**0.60**	**29**

Under Land Use Code 217 the average observed parking demand rate is 0.55 spaces per dwelling unit in a dense multi-use urban setting, equating to approximately 26 spaces for a 48-unit development. The category is expressly designated as not close to rail transit, which corresponds to the transit conditions at the subject site.

Under Land Use Code 223 the observed rate is 0.37 vehicles per bedroom in a dense multi-use urban setting across 29 studies, equating to approximately 18 spaces at 48 bedrooms. In a general urban/suburban setting the rate is 0.55 per bedroom, being approximately 26 spaces.

9.1. Conclusion

ITE parking generation data represents aggregated North American field observations and is intended as a technical benchmarking reference rather than a regulatory standard. Applied to 48 dwelling units, Land Use Code 217 indicates a demand of 26 vehicles and Land Use Code 223 indicates 18 vehicles. The 29 spaces available to the residential component exceed both.

The site-derived rate of 0.87 vehicles per occupied unit yields 42 vehicles at 48 dwelling units. That rate is drawn from proxy sites comprising one and two-bedroom units and represents an upper bound for the bachelor units proposed. The ITE benchmarks for this unit form, together with the municipal comparators in **Section 8**, establish a demand range of 18 to 26 vehicles, which the residential supply of 29 accommodates.

*Note: The rates published in the 6th Edition are materially lower than those in the 5th Edition for equivalent land uses, the affordable housing category falling from 0.53 spaces per unit to 0.37 vehicles per bedroom. That reduction reflects a continuing decline in private vehicle ownership and use across North American multifamily housing, and is consistent with the direction of municipal parking standards set out in **Section 8**.*

10. PARKING ALLOCATION AND DEMAND MANAGEMENT

10.1. Parking Allocation

The proposed supply of 38 spaces is allocated as 9 spaces to the commercial component at the front of the property, being its full requirement under Section 4.19(r), and 29 spaces to the residential component, comprising the 18 rear spaces and 11 front spaces. Residents shall be assigned a maximum of 24 dedicated spaces through lease agreement, being one space per two dwelling units. The remaining 5 spaces are unassigned and available to visitors. Once commercial operating hours conclude, the 9 commercial spaces are available for visitor use, giving 14 visitor spaces in the evening and overnight.

Table 14 – Proposed Parking Allocation

Allocation	Spaces	Rate (per dwelling unit)	Location
Commercial Component	9	-	Front Lot
Residential (Dedicated by Lease)	24	0.50	18 Rear Lot 6 Front Lot
Visitor	5	-	Front Lot
Total Proposed Supply:	**38**	**0.79**	**-**
Total Available to Residents	29	0.60	
Available to Residents and visitors after 18:00 (commercial close)	38	0.79	9 Commercial spaces released

The 29 spaces available to the residential component equate to 0.60 spaces per dwelling unit. In evaluating the current Zoning By-law, a unique use-case exists that reflects a similar intended use pattern for the proposed development through the Senior Citizen Housing use case. Senior Citizen Housing is a form of housing that anticipates reduced vehicular ownership for the tenants, similar to our site, and prescribes a minimum of one space per three dwelling units, with no less than 25% of those spaces identified as visitor spaces. When compared against our 48-unit development, a total of 16 spaces of which 4 visitor spaces would be required. The proposed residential allocation of 29 spaces (0.60 spaces per unit) is nearly twice the Senior Citizen Housing guideline and exceeds the ITE observed rates for low-rise multifamily housing served by transit and for income-limited housing set out in **Section 9** of 0.55 spaces per unit for one-bedroom low-rise housing and 0.37 vehicles per bedroom for income-limited housing, and sets a good precedent for creating a requirement in line with limited vehicular ownership.

10.2. Parking Assignment and Enforcement

It is recommended that a total of 24 parking spaces (50%) will be managed through lease agreements, allowing ownership to control allocation and prevent over-assignment. Once the 24 dedicated spaces are assigned, no further space is assigned to a resident. The 5 unassigned spaces remain available on a first-come basis to residents and to visitors. This cap is a condition of tenancy and is capable of being secured as a condition of approval.

10.3. Additional Transportation Demand Management Measures

The following additional measures will support the efficient use of the available parking supply:

- **Shared Use of the Front Parking Area:** The observed data demonstrate that commercial parking activity is concentrated between 08:00 and 17:00 on weekdays and does not accumulate. The front parking area is accordingly available to accommodate residential demand outside commercial operating hours, when residential demand peaks increasing visitor parking spaces from 5 to 14 spaces.
- **Monitoring and Adaptive Management:** Ownership will monitor parking utilization over time and adjust allocation strategies as needed to respond to demand.
- **Visitor Accommodation Flexibility:** Visitor parking demand is intermittent and is accommodated within the 5 unassigned spaces, increasing to 14 outside commercial operating hours. On-street parking on the adjacent local streets provides additional short-term capacity where required, though no on-street capacity is relied upon in this assessment.
- **Bicycle Parking Provision:** A secure bicycle parking area of 3.29 m by 6.1 m is provided at the front of the property, and can accommodate up to 12 bicycle spaces sized in accordance with OTM Book 18 (subject to optimization). Priority for bicycle parking is given to tenants without an assigned vehicle space. Between assigned vehicle spaces and bicycle spaces, 36 of the 48 units are provided with a dedicated mobility space on site.
- **Subsidized Transit Passes:** Tenants without an assigned vehicle space are offered a subsidized transit pass by the landlord. Chatham Conventional Route 2 stops directly in front of the property and Route 1 ~300 metres west, both on 30-minute headways from 6:15 a.m., with bi-directional service to the Downtown Transfer Terminal within approximately 4 minutes of bus travel time.

These measures, combined with the demonstrated parking demand and proposed supply, provide a controlled and adaptable parking management framework that supports the long-term functionality

of the site without reliance on additional parking supply. The measures described above are offered by the owner and are capable of being secured as conditions of approval.

10.4. Policy Context and Future Adaptability

Municipal parking standards for apartment housing across Ontario are being revised downward, as set out in **Section 8**. The Municipality is currently preparing a Mobility Master Plan consolidating its Transportation Master Plan, Trails Master Plan and Transit Strategy over a twenty-year horizon. The proposed allocation assigns one parking space per two dwelling units, corresponding to an auto-ownership rate of approximately 0.50 vehicles per unit against the 1.25 implied by the By-law. The bicycle parking and subsidized transit passes support that outcome rather than assume it, and the proposal is consistent with the policy direction toward transit-supportive intensification and reduced auto dependence within the built-up area.

The cycling network described in Section 2.2.4 supports that direction. The Community Loop lies approximately 380 m east of the site and protected lanes ~660 m west on Sandys Street, with on-street cycling facilities continuing to be added across Chatham. Should cycling demand increase as that network expands, additional bicycle parking can be accommodated on site by converting standard parking stalls to bicycle storage. Applying a 2.0 m access aisle with double-sided racks on either side, City of Toronto Guidelines for the Design and Management of Bicycle Parking Facilities establishes that two car parking spaces accommodate approximately 20 bicycle parking spaces, being 10 spaces per stall. The conversion of two stalls would accordingly provide a further 20 spaces, bringing the total on-site bicycle provision to 32. Any such conversion would be drawn from the unassigned and visitor spaces and would not reduce the 24 spaces assigned to residents.

11. CONCLUSION AND RECOMMENDATIONS

The existing building predates the Zoning By-law and is deemed to comply under Section 4.23, though it is deficient against the current standard. The proposal repeats that structure at a larger unit count, with the commercial requirement satisfied and the entire deficiency falling on residential parking.

Table 15 – Parking Summary

Parameter	Existing (21 units)	Proposed (48 units)
By-law Requirement	36	69
Parking Supply	27	38
Deficiency/Relief Sought	-9 (Deficient)	-31 (Relief)
Residential Available (supply less 9 commercial allocated)	18	29
Residential Ratio	0.86	0.60

Nine spaces are allocated to the commercial unit and residential adequacy is accordingly measured against 29 spaces. Three measures of demand were tested against that supply:

- Site-derived rate of 0.87 vehicles/unit yields 42 vehicles, the peak demand from proxy sites.
- ITE 6th Edition, using the closest comparable land uses, records 0.55 spaces/unit and 0.37 spaces/bedroom for income-limited housing, being 18 to 26 vehicles.
- Toronto, applies 0.40 and 0.22 spaces/unit to bachelor/affordable units, being 19 and 11 spaces.

The 29 spaces available exceed every measure other than the peak demand derived from larger units. The existing building demonstrates the relationship: at full tenancy the design rate of 0.87 yields 18 vehicles across 21 units against the 18 spaces available, with no observed spillover to adjacent streets. In both cases the residential supply matches the demand generated and falls below the By-law rate.

It is recommended that the following be secured as conditions of approval:

- The parking lot be optimized to 38 parking stalls, 18 in the rear and 20 in the front lot;
- resident parking be limited to 24 dedicated spaces assigned by lease (50% of residential units);
- 5 spaces assigned as visitor parking, increasing to 14 spaces outside commercial operating hours. (for a total of 29% visitor parking).
- 9 spaces be retained for the commercial component;
- 12 secure bicycle spaces be provided at the front of the property; and
- tenants without an assigned vehicle space be offered a subsidized transit pass to promote alternative modes of travel and reduce reliance on automobiles.

Subject to the conditions above, it is my professional opinion that:

- the proposed development represents modest and appropriate residential intensification within an established urban area;
- the proposed parking supply is functionally adequate;
- the site access and circulation operates acceptably and is not materially altered by the proposal;
- the development will not result in undue adverse transportation or parking impacts.

Accordingly, the relief sought to permit 48 dwelling units and one commercial unit with a parking supply of 38 spaces is reasonable and appropriate for the subject property, and is consistent with the policy direction toward transit-supportive intensification set out in **Section 10.4**.

12. REFERENCES AND SOURCES

- Municipality of Chatham-Kent. *Zoning By-law No. 216-2009 (Consolidated April 2026)*, Section 4.19 – Parking Provisions.
- Municipality of Chatham-Kent. *Chatham-Kent Transit – Chatham Conventional Routes 1 and 2, Route Maps and Schedules, June 2021*
- Municipality of Chatham-Kent. *Chatham-Kent Cycling Map*, 2021.
- Accessibility for Ontarians with Disabilities Act, 2005. Ontario Regulation 191/11 - Integrated Accessibility Standards, Section 80.36 (Accessible Parking).
- City of Sarnia. Zoning By-law No. 63 of 2014.
- City of Sarnia. Draft Comprehensive Zoning By-law (Draft 3 - October 2025).
- City of London. Zoning By-law No. Z.-1, Section 4.19 - Parking, as amended by Zoning By-law Amendment Z-26042 (adopted July 21, 2026).
- City of Toronto. Zoning By-law 569-2013, Chapter 970 - Transition: Parking Space Regulations.
- Institute of Transportation Engineers (ITE). Parking Generation Manual, 6th Edition.
- MDT Urban Traffic Solutions Ltd. *9 Sarah Crescent (Chatham, ON) – Updated Parking Justification Report*, Rev.02, August 2026. (2026-04 OLT - 9 Sarah Crescent OLT Statement (Updated Parking Justification Report Rev.02)
- MDT Urban Traffic Solutions Ltd. *43 and 49 Taylor Avenue (Chatham, ON) – Updated Parking Justification Report*, March 2026. (2026-03 OLT - 43-49 Taylor Avenue - Updated Parking Justification Report)
- Property management records - Rent Roll with Lease Charges and Tenant List, 220 St. Clair Street, 43 and 49 Taylor Avenue and 9 Sarah Crescent, as of July 20, 2026 (summarized in **Appendix D**).
- Ontario Ministry of Transportation. *OTM Book 18 – Cycling Facilities*, 2nd Edition, 2021.
- City of Toronto. *Guidelines for the Design and Management of Bicycle Parking Facilities*.

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APPENDIX A

(CV)



EDUCATION

Bachelor, Civil Engineering, McMaster University, Hamilton, ON, Canada, 2012

MEMBERSHIPS

Professional Engineers Ontario (PEO), 100188927

Association of Professional Engineers & Geoscientists of British Columbia (APEGBC), 48037 *(Expired 2024 [can renew])*

Canadian Society of Civil Engineers (CSCE)

CERTIFICATIONS

OTC - Work Zone Traffic Control and Safety

Michael Dworczak, P.Eng.

PRINCIPAL, SENIOR TRANSPORTATION ENGINEER

With over 13 years of experience, Michael has had the opportunity to work on a variety of transportation related projects from traffic impact studies for developers to leading the traffic and utility scope for large-scale transit projects such as the Surrey-Langley SkyTrain Project in Vancouver and the Scarborough Subway Extension in Toronto. Through these roles Michael has provided hands-on leadership and has represented the project owner to resolve complex issues while maintaining alignment and communication with municipal stakeholders and transit authorities.

As a transportation engineer, Michael has conducted numerous traffic impact studies and developed strong expertise in traffic data analysis, including data collection, traffic distribution, trip generation, traffic modeling, and traffic engineering design. Proficient in Synchro (network operations analysis) with working knowledge of VISSIM and ArcGIS (ArcMap), Michael is also certified in work zone traffic control and safety, with expertise in construction staging operations and comprehensive knowledge of roadway signage and traffic management plans. This experience encompasses a wide range of traffic expertise, contributing significantly to traffic components analyses for projects spanning Subway and SkyTrain construction to LRT/BRT implementation. Additional work includes Class EA studies, road reconstruction, needs and justification analyses, traffic operational analyses, travel demand forecasting, and construction staging analyses.

While working in BC, additional experience was gained in construction site supervision roles being involved with the completion of major rail yard expansion at the BCR Deltaport terminal, as well as producing and providing peer review of construction traffic management plans for a variety of heavy rail projects involving authorities such as the Vancouver Fraser Port Authority (VFPA), CP Rail and the BC Ministry of Transportation and Infrastructure (MOTI).

FEATURED PROJECT EXPERIENCE

Transportation Engineering & Planning

Role: Transportation Planner, Traffic Engineer, Project Manager

Services Provided: Traffic Impact Studies, Data Analysis, Traffic Forecasting, Traffic Operations Analysis, Safety Analysis, Technical Review, Conceptual Design, Stakeholder Consultation, Public Consultation, Council Presentations, Project Management, Evaluation of Alternatives, Guideline Development, Network Development, Environmental Assessments, Program Development, Policy Formulation

- 231 Bay Street North TIA, Hamilton, ON
- SkyTrain Operations and Maintenance Centre 4, TransLink, BC
- Canadian Pacific Rail: Cascadia West Expansion, VFPA, BC
- Centerm Rail Expansion Project, VFPA, BC
- Great Lakes Blvd/Timeless Dr Roundabout Analysis and Detailed Design, Oakville, ON
- Operational Review of Existing Traffic Calming, City of Vaughan, ON
- Sioux Lookout High School Traffic Impact Study, Sioux Lookout, ON
- Parkdale Development Traffic Impact Study, Thunder Bay, ON
- Superior Gas Limited Traffic Impact Study, Stevensville, ON
- Review of Proposed Access to 5002 King Street, Grimsby, ON
- Elmwood Drive Site Access Traffic Impact Study, Moncton, NB
- Technical review of access requirements for proposed commercial development at 388 Queen Street, Acton, ON
- VIVA Next Bus Rapid Transit Expansion Pursuit (Metrolinx and IO), York Region, ON
- Eglinton Crosstown Twin-Tunnel Project, Toronto, ON
- Ministry of Transportation Northwest Retainer, Thunder Bay, ON
- Waterloo Tri-City LRT Pursuit, Waterloo, ON
- The Rt. Hon. Herb Gray Parkway [Windsor-Essex Parkway], Windsor, ON
- Tote Road Mary River Mine Road Signage, Baffin Island, NU
- Highway 22 Access to Mosaic Esterhazy K3 Site, Saskatoon, SK
- Cliffs Chromite Mine Traffic Impact Study, Nakina, ON
- IKEA Access Peer Review, Burlington, ON
- Thompson Nickel Concentrate Load-Out Study, Sudbury, ON
- Ogilvy Avenue Rail Crossing Traffic Impact Study, Montreal, QC
- Winston Churchill Boulevard Widening Class EA Study, Mississauga, ON
- Elgin Mills Road Class EA from Bathurst Street to Yonge Street, York, ON
- Mayfield Road Widening Class EA Study, Brampton/Caledon, ON
- Kitney Drive Extension Class EA Study, Ajax, ON
- McVean Drive Class EA Study, Mississauga, ON

Construction Staging & Safety

Role: Transportation Planner, Traffic Engineer

Services Provided: Traffic Forecasting, Traffic Operations Analysis, Safety Analysis, Program Development, Policy Formulation, Public and Stakeholder Consultation, Council Presentations, Project Management

- Pattullo Bridge Rehabilitation Project, MOTI, BC
- Roberts Bank Intermodal Yard Expansion, BCR, Delta, BC
- Hwy 50 Trunk Sanitary Sewer Construction Traffic Management Plan, Brampton, ON
- Central Avenue Construction Staging and Traffic Control Plan, Fort Erie, ON
- Burbrook Trunk Sanitary Sewer Traffic Control Plan, London, ON
- Alloa Feedermain Consolidated Traffic Management Plan, Brampton, ON

- Corridor Incident Management/Emergency Detour Routeing Plan Development and Implementation, Halton, ON
- Niagara-on-the-Lake Speed Limits Review, Niagara-on-the-Lake, ON

Transit & Sustainable Mobility

Role: Project Manager, Project Manager, Utility Lead, Transportation Engineer, Transportation Planner

Services Provided: Technical Review, Compliance, Traffic & Transit Management Planning, Utility Coordination, Stakeholder Consultation, Council/Community Presentations, Project Management, Technical Review, Conceptual Design, Research, Travel Demand Forecasting, Network Analysis, Traffic Operations Analysis, Safety Analysis, Preliminary and Detailed Design

- Scarborough Subway Extension (SSE) PDB, Metrolinx, Toronto, ON
- Surrey–Langley SkyTrain Extension, TransLink, Surrey–Langley, BC
- Scarborough Subway Extension (SSE) P3, TTC, Toronto, ON
- Honolulu Rail Transit Project, HART, Honolulu, HI
- Eglinton Crosstown LRT Twin-Tunnel Project, Toronto, ON
- Infill Sidewalk and Multi-Use Trail Program, Town of Ajax, ON
- VIVA Next Bus Rapid Transit Expansion Pursuit (Metrolinx and IO), York Region, ON
- Eglinton Crosstown Twin-Tunnel Project, Toronto, ON
- GO Transit Planning Studies on Confederation GO Station, Hamilton, ON
- Waterloo Tri-City LRT Pursuit, Waterloo, ON

Road/Highway Design and Construction

Role: Transportation Planner, Traffic Engineer, Quality Control Auditor

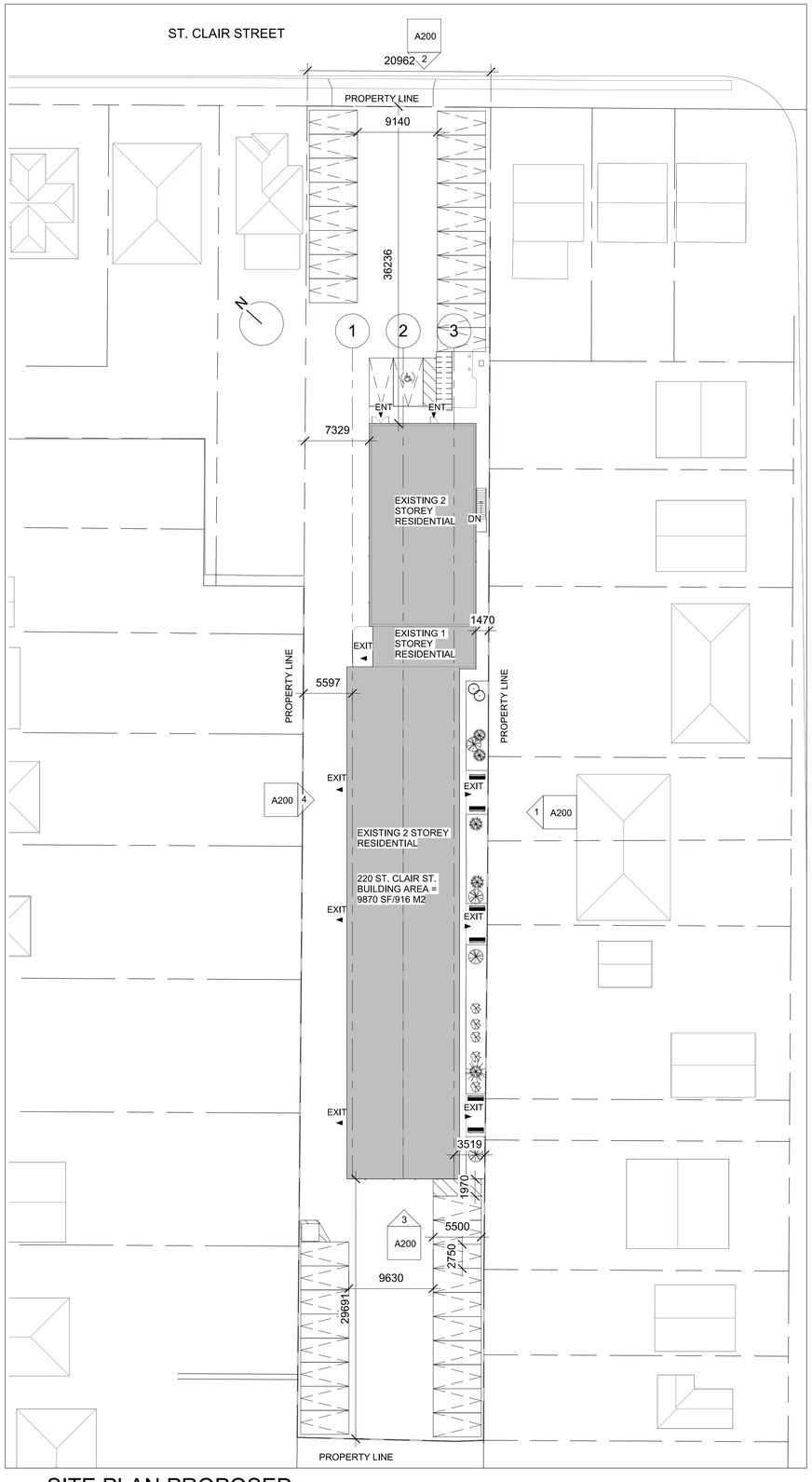
Services Provided: Traffic Operations Analysis, Safety Analysis, Technical Review, Conceptual Design, Need and Justification, Tender Document Preparation, Contract Administration, Stakeholder Consultation

- Highway 61 Rehabilitation Detail Design, MTO Northwestern, Thunder Bay, ON
- Pattullo Bridge Rehabilitation Project, MOTI, BC
- Highway 61/Chippewa Road Preliminary Design Review, MTO Northwestern, Thunder Bay, ON
- Leslie Street and 19th Avenue Intersection Reconstruction, York, ON
- Regional Road 13 Road Reconstruction, Durham, ON
- Convair Drive Road Reconstruction, GTAA, Toronto, ON
- Town of Ajax Infill Sidewalk and Multi-Use Trail Program, Ajax, ON
- Rt. Hon. Herb Gray Parkway (Windsor-Essex Parkway), Infrastructure Ontario, Windsor, ON

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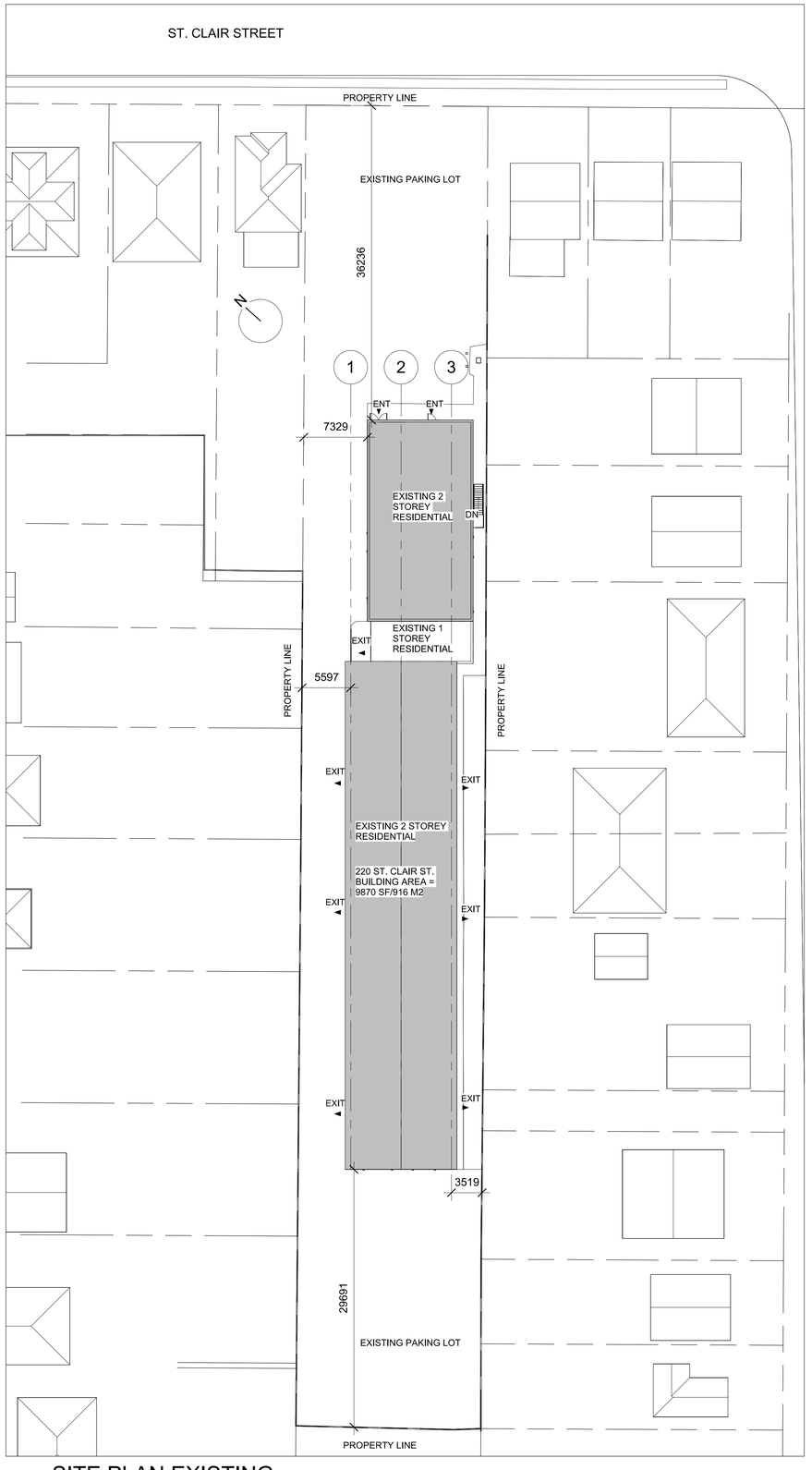
APPENDIX B

(Existing and Proposed Site Plan)



2 SITE PLAN PROPOSED

1 : 300



1 SITE PLAN EXISTING

1 : 300

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FOUNDATION CAPITAL

DO NOT SCALE THIS DRAWING. THE CONTRACTOR SHALL BE RESPONSIBLE FOR TAKING AND VERIFYING ALL THE DIMENSIONS AND REPORTING ERRORS AND/OR OMISSIONS TO THE ARCHITECT IN WRITING BEFORE PROCEEDING WITH THE WORK.

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STATUS: CONCEPTUAL
NOT FOR CONSTRUCTION

No.	Description	Date

FOUNDATION CAPITAL

220 ST. CLAIR STREET
CHATHAM-KENT, ONTARIO

SITE PLAN

GOODPLACEDESIGN.COM
300 CAMPBELL AVE,
TORONTO, ON
M6P 3V6

DATE Issue Date

DRAWN BY Author

A101

SCALE 1 : 300

2026-09-01 10:14:43 PM

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URBAN TRAFFIC SOLUTIONS LTD.

APPENDIX C

(Traffic Count Data and Site Photos)

Traffic Count

220 St Clair Street - Chatham, Ontario

Count Date: March 15, 2026

Hour	Vehicle Enter	Vehicle Exit	**Parking Lot Total**
START			8
1:00	0	0	8
2:00	0	0	8
3:00	0	0	8
4:00	0	0	8
5:00	0	0	8
6:00	0	1	7
7:00	0	0	7
8:00	0	0	7
9:00	1	1	7
10:00	0	0	7
11:00	0	1	6
12:00	1	1	6
13:00	1	2	5
14:00	0	0	5
15:00	3	4	4
16:00	1	1	4
17:00	1	0	5
18:00	2	2	5
19:00	1	1	5
20:00	1	0	6
21:00	1	1	6
22:00	0	0	6
23:00	0	0	6
0:00	0	0	6

Traffic Count
220 St Clair Street - Chatham, Ontario

Count Date: March 16, 2026

Hour	Vehicle Enter	Vehicle Exit	**Parking Lot Total**
START			6
1:00	0	0	6
2:00	0	0	6
3:00	0	0	6
4:00	0	0	6
5:00	0	0	6
6:00	0	4	2
7:00	0	0	2
8:00	3	3	2
9:00	5	2	5
10:00	7	7	5
11:00	9	8	6
12:00	10	12	4
13:00	8	8	4
14:00	12	12	4
15:00	12	10	6
16:00	9	9	6
17:00	1	4	3
18:00	4	4	3
19:00	2	1	4
20:00	2	2	4
21:00	0	2	2
22:00	1	1	2
23:00	0	0	2
0:00	0	0	2



Site Photo 1 - Rear Parking Lot Facing South



Site Photo 2 - Rear Parking Lot Facing North



Site Photo 3 - Front Parking Lot Facing East



Site Photo 4 - Rear Access Aisle Facing West

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APPENDIX D

(Unit Occupancy Summary)

APPENDIX D

Unit Occupancy Summary – 220 St. Clair Street, Chatham, Ontario

The following summarizes the occupancy status of the existing dwelling units at 220 St. Clair Street at the time of the parking utilization surveys undertaken on March 15 and March 16, 2026, and as at July 20, 2026. This summary has been derived from property management records. Tenant identities, market rents, security deposits and lease charges have been omitted.

Table D-1 – Residential Unit Occupancy, 220 St. Clair Street

Unit	Status at Survey (March 15 16, 2026)	Lease Commencement	Status at July 20, 2026
1	Occupied	January 2022	Occupied
2	Occupied	October 2024	Occupied
3	Vacant	-	Vacant
4	Vacant	-	Vacant
1B	Vacant	-	Vacant
101	Occupied	February 2025	Vacant (moved out June 2026)
102	Vacant	-	Vacant
103	Vacant	-	Vacant
104	Vacant	-	Vacant
105	Occupied	January 2022	Occupied
106	Occupied	July 2025	Occupied
107	Vacant	-	Vacant
108	Vacant	-	Vacant (leased from August 2026)
201	Vacant	-	Vacant
202	Vacant	-	Vacant
203	Vacant	-	Vacant
204	Vacant	-	Vacant
205	Vacant	-	Vacant
206	Vacant	-	Vacant
207	Occupied	January 2022	Occupied
208	Occupied	October 2023	Occupied
Total	**7 Occupied (14 Vacant)**	-	**6 Occupied (15 Vacant)**

Note: the table above lists the twenty (21) residential suites recorded in the property management records. The following table identified the commercial (Unit 1A) space:

Table D-2 - Commercial Unit Occupancy, 220 St. Clair Street

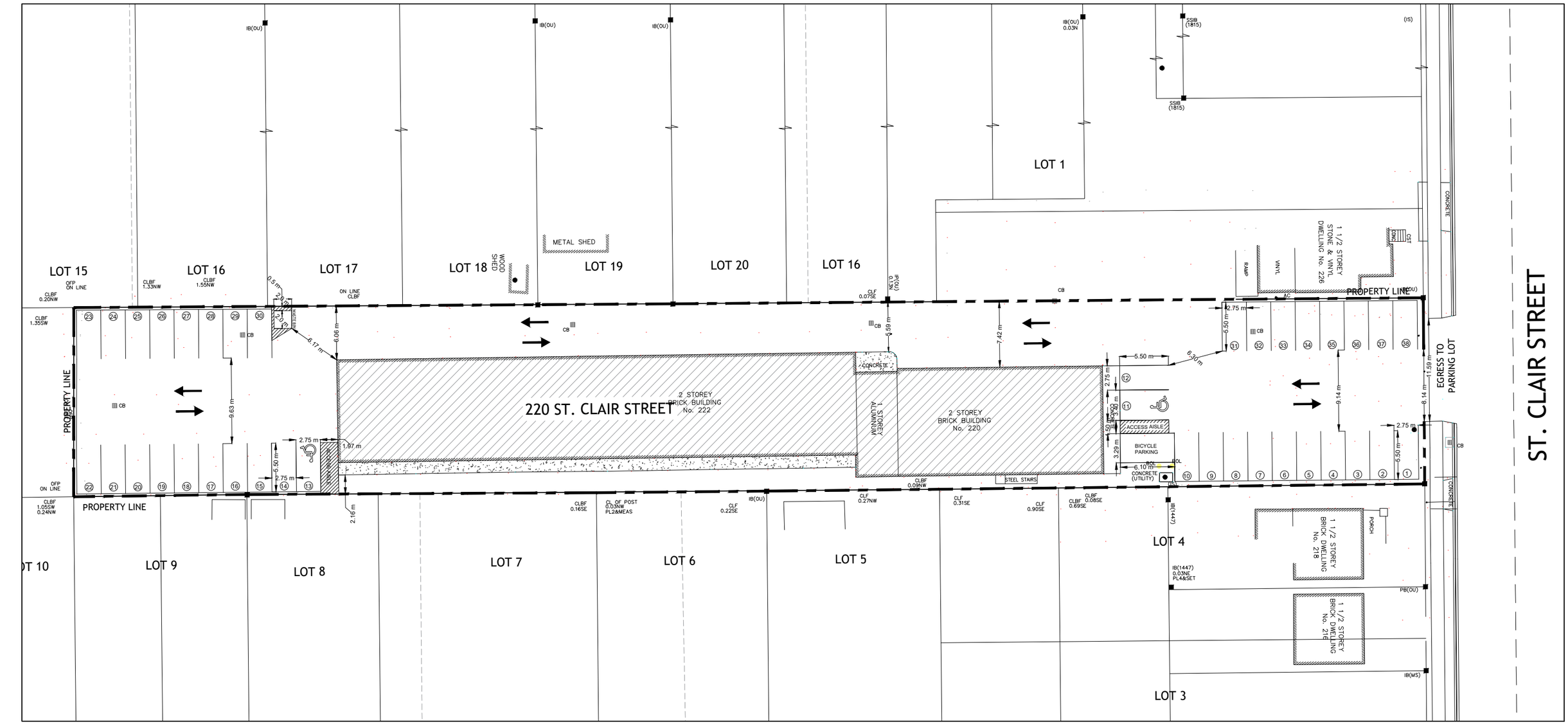
Suite	Status at Survey (Mar 15 16, 2026)	Lease Start	Lease Expiry
1A	Occupied	June 2023	May 2028

Source: Property management records (Rent Roll with Lease Charges and Tenant List), as of July 20, 2026. Tenant names, market rents, security deposits and lease charges have been omitted as commercially confidential. The underlying records are retained on file and are available to the Committee of Adjustment or the Ontario Land Tribunal in confidence upon request.

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APPENDIX E

(Proposed Parking Plan)



General Legend:

Property Boundary

LICENSED PROFESSIONAL ENGINEER
Sept. 2. 2026
M. DWORCZAK
100188927
PROVINCE OF ONTARIO

Client:

Michael Nemanic Law
Professional Corporation

Project:

220 St. Clair Street
Chatham, ON

Title:

Proposed Parking Plan

Rev	Date	Description	By	Chkd.
A	08.01.26	Issued for Approval	EB	MD
B	08.20.26	Issued for Approval	EB	MD
C	08.25.26	Issued for Approval	EB	MD

Scale @ A3:	1:40
Prepared by: E. Beggs	Checked: M. Dworczak
Date:	August 2026
Country:	Canada
Drawing Status:	Approval
Drawing No.:	1001
Revision:	C

MDT