

**COMMISSIONER'S REPORT ON THE
ENVISION ST. JOHN'S MUNICIPAL PLAN
AMENDMENT No. 15, 2025**

and

**ENVISION ST. JOHN'S DEVELOPMENT REGULATIONS
AMENDMENT No. 44, 2025**

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1.0 Introduction

At the Regular Meeting of the St. John's Municipal Council ('Council') held on April 9, 2025, I was appointed as the Commissioner to conduct a hybrid Public Hearing (in-person and online) and prepare a report with recommendations with respect to proposed amendments to both the Envision St. John's Municipal Plan (*Amendment Number 15, 2025*) and Envision St. John's Development Regulations (*Amendment Number 44, 2025*). The intent of these amendments is as follows:

Envision St. John's Municipal Plan (*Amendment Number 15, 2025*)

Redesignating land along Main Road and Shoal Bay Road, Goulds, from the Urban Expansion Land Use District and Rural Land Use District to the Residential Land Use District

Envision St. John's Development Regulations (*Amendment Number 44, 2025*)

Rezoning land along Main Road and Shoal Bay Road, Goulds from the Rural (RUR) Zone, Rural Residential Infill (RRI) and Rural Residential (RR) Zone to the Residential 1 (R1) Zone, from the Rural Residential Infill (RRI) Zone to the Rural (RUR) Zone, and from the Rural Residential Infill (RRI) Zone to the Rural Residential (RR) Zone

This redesignation and rezoning of specific lands along both Main Road and Shoal Bay Road, Goulds, is in response to a City initiative to allow serviced development in these areas.

It is important to state that the St. John's Municipal Plan must conform to the St. John's Urban Region Regional Plan (SJURRP), which was adopted by the Province in 1976. This Plan applies to all land in the St. John's Urban Region, which is essentially the Northeast Avalon Peninsula. The SJURRP is the Province's principal document for determining land use and development in the Urban Region. It distinguishes between urban and rural areas, and provides protection for the Urban Region's agricultural area, resource areas and designated scenic roads. It is the framework within which municipal plans are prepared by municipalities on the Northeast Avalon.¹

My appointment as Commissioner was made by Council under the authority of Section 19 of the *Urban and Rural Planning Act, 2000*, with the accompanying duties established in Section 21(2) and 22(1) which note that the Commissioner is to '[...] hear objections

¹ City of St. John's. St. John's Municipal Plan (June 2007). Section I -1.4 Relation to Other Levels of Planning. Pg. 1-4.

and representations orally or in writing [...]’ and, subsequently, to submit a written report on the Public Hearing including recommendations arising from the hearing.

The hybrid Public Hearing session for the proposed amendments related to Main Road and Shoal Bay Road was scheduled for 7 p.m. on Monday, May 5, 2025 – in-person and via Zoom.

Prior to this date, and as required by legislation, the amendments were advertised in the October 18 and October 25, 2024, editions of The Telegram. Additionally, the amendments were publicized on the City of St. John’s website (<https://www.stjohns.ca/en/news/application-main-road-and-shoal-bay-road.aspx>), and background information on the amendments was available from the Engage St. John’s project page. A notice of the amendment was mailed out, as required, to all property owners within a minimum radius of 150 metres of the subject property area. A comment period was opened with comments received on the Engage Page and via email.

Subsequently, the media advised of the date, time, location, and purpose of the hybrid Public Hearing and noted the end date/time for submission of comments for the hearing - 9:30 a.m. Monday, May 5, 2025. The hybrid session was convened, as planned, on Monday, May 5, 2025, at 7 p.m. Three residents attended in person, and three via Zoom. In addition to Your Commissioner, two City staff, and a member of Council also were in attendance.

Over the submission period, prior to the Public Hearing, five submissions were received. These submissions are referenced in this report under the section ‘Written Submissions Received’ (see Section 3.0), and the full text of the submissions is found in Appendix A.

1.1 The Issue

The issue for Your Commissioner and the focus of the hybrid session and submissions was whether the following two amendments should be approved. In general, the intent of the amendments are:

- **Envision St. John’s Municipal Plan (*Amendment Number 15, 2025*)**

- Redesignating land along Main Road and Shoal Bay Road, Goulds from the Urban Expansion Land Use District and Rural Land Use District to the Residential Land Use District

- **Envision St. John's Development Regulations (Amendment Number 44, 2025)**

Rezoning land along Main Road and Shoal Bay Road, Goulds from the Rural (RUR) Zone, Rural Residential Infill (RRI) and Rural Residential (RR) Zone to the Residential 1 (R1) Zone, from the Rural Residential Infill (RRI) Zone to the Rural (RUR) Zone, and from the Rural Residential Infill (RRI) Zone to the Rural Residential (RR) Zone

2.0 Background

2.1 The Application

The process leading to the hybrid Public Hearing on the proposed amendments was triggered by the City's initiative to allow serviced development along areas on Main Road and Shoal Bay Road in Goulds. This would include land that fronts on these roads and have existing water and sewer systems.

2.2 The Review Processes

The following provides an overview of the relevant correspondence and activity related to the City's initiative requiring the amendments referenced earlier.

February 20, 2024 – Correspondence from Ken O'Brien, MCIP, Chief Municipal Planner to the Committee of the Whole (considered at a February 27, 2024 meeting)

Background and Current Status

This correspondence to the Committee of the Whole outlined the rationale for the City's request to consider extending the Residential (R1) Zone along Main Road and Shoal Bay Road for areas that can be serviced with municipal water and sewage.

This correspondence overviewed the improvements the City has made to the municipal sewage system in Goulds in recent years. Of note was such improvements have diverted raw sewage from the outfall at Shoal Bay as a force main results in the sewage being pumped in such a way that it can be treated at the Riverhead sanitary sewage treatment station before discharge into the harbour.

While it is stated that the system requires ongoing monitoring in the short term to ensure it works as expected, it was highlighted that this could potentially open new lands in Goulds with serviced developments. As detailed in this correspondence, in the interim and in advance of any such broader development, the City can consider allowing

new development along Main Road and Shoal Bay Road on lands that front these roads and have municipal water and sewage systems already in place, and are in the Goulds Future Ultimate Service Area – the area that potentially can be serviced by the City's upgraded water and sewage systems.

This correspondence describes in detail which properties are included along Shoal Bay Road and Main Road. It explains that some serviced properties north of this area are excluded by virtue of falling into a flood plain and buffer of Cochrane Pond Brook and Third Pond.

The benefits of the rezoning are detailed including to increase residential development along roads with existing services and possibly change the character from rural toward suburban, in line with the central area of Goulds - further north.

Rezoning

The rezoning would be for lands along these aforementioned roads, and within the area identified, that are zoned Rural Residential Infill (RRI). It was stated that while an amendment would not be required for the SJURRP, a St. John's Municipal Plan amendment and commissioner hearing would be required arising from the need for a change in designation from the Urban Expansion District. Additionally, the Municipal Plan requires that a comprehensive development plan be prepared prior to development in the Urban Expansion Areas, and this would include consideration of lot depth which was seen to be quite expansive – e.g., 70 m+ for some of the subject properties.

Key Considerations/Implications

In terms of key considerations and/or implications for the City, the following were identified:

- Partners or Other Stakeholders: Property owners, residents, and business owners in Goulds.
- Alignment with Strategic Directions:
 - A Sustainable City: Plan for land use and preserve and enhance the natural and built environment where we live.
 - A Sustainable City: Facilitate and create the conditions that drive the economy by being business and industry friendly; and being a location of choice for residents, businesses and visitors.

- Alignment with Adopted Plans: In line with the policies of the Envision St. John's Municipal Plan.
- Legal or Policy Implications: In line with the Goulds Future Ultimate Service Area of the Envision St. John's Development Regulations.
- Engagement and Communications Considerations: Will need public consultation in line with the Envision St. John's Development Regulations.

Recommendations

Staff recommended public consultation in consideration of the amendments, and that 'Council consider rezoning lands along Main Road and Shoal Bay Road, Goulds, from the Rural Residential Infill (RRI) Zone to the Residential 1 (R1) Zone and prepare a comprehensive development plan for same.' It was noted a Municipal Plan amendment was required.

March 5, 2024, Regular Meeting of Council

Agenda item: Committee of the Whole Report – February 27, 2024

Goulds Zoning Serviced Area

This report (minutes from the Committee of the Whole meeting) noted that Councillor Ridgeley (Ward Councillor for the area) expressed concern over the lack of specificity for the time frame for development. 'The Deputy City Manager of Planning, Engineering, & Regulatory Services advised that the improvements to the municipal sewage system will require monitoring to ensure that things are operating in accordance with the design. The system is intended to separate storm water from the sanitary system and monitoring will be required to ensure that the system has the capacity to handle development. development.'

The minutes identified that there could be a few dozen lots arising from the proposed rezoning.

The recommendation emanating from this Committee meeting was accepted:

That Council consider rezoning lands along Main Road and Shoal Bay Road, Goulds, from the Rural Residential Infill (RRI) Zone to the Residential 1 (R1) Zone and prepare a comprehensive development plan for same. This matter would be referred for public consultation. A Municipal Plan amendment is required.

September 17, 2024 – Correspondence from Ken O’Brien, MCIP, Chief Municipal Planner to the Committee of the Whole (considered at a September 24, 2024 meeting)

This correspondence reminded Council of the rezoning to be considered and the previous recommendation as outlined above. This correspondence primarily detailed that the area for rezoning has been refined in relation to the question of the standard lot depth of 30m for an R1 Zone. It was highlighted that arising from the depth of some lots, the refined area ‘goes deeper in places, including entire properties that are currently RRI Zone. [...] Limiting the lot depth for R1 to 30 metres may prevent some property owners from being able to subdivide, based on where their houses are built.’ As such, the R1 Zone was proposed to go deeper into the properties. It was reiterated, however, that the amendments are only in relation to serviced properties fronting along Main Road and Shoal Bay and that additional refinement might occur following public consultation.

It was stated that further information on the comprehensive development plan would be forthcoming following public consultation (the next step) and at the time the amendments would be brought back to Council for adoption.

In addition to *Key Considerations/Implications* referenced earlier, the following were identified:

- Legal or Policy Implications: Map amendments to the Envision St. John’s Municipal Plan and Development Regulations are required.
- Engagement and Communications Considerations: Public consultation will be carried out in accordance with Section 4.8 of the Development Regulations.

Public consultation (as detailed in a January ‘2025 amendment package’ developed by City staff)

The proposed Municipal Plan and Development Regulations amendment were advertised on two occasions in The Telegram newspaper on October 18, and October 25, 2024. A notice of the amendment was also mailed to property owners within 150 metres of the subject properties and posted on the City’s website. Background information on the amendment is available at the Engage St. John’s project page.

Comments/Submissions received in relation to the notices published, as described above

The response to the public consultation included both email and comments provided on the Planning Engage St. John's page, which could have some crossover in terms of submissions/comments being provided by the same residents. Your Commissioner reviewed the information provided, noting there were 19 comments received and two additional submissions emailed directly to City staff and/or the Ward Councillor.

Overall, the comments/submissions identified mixed views but primarily centring on two or three key issues. Some of those providing comments and/or emailing were in favor of the amendments noting, for example, the opportunity for growing Goulds as a community including in relation to additional programs and activities, as well as services and businesses to support the expansion; and an increase in housing, which potentially could respond to diverse needs.

Others expressed concerns and/or identified specific issues including the following:

- The impact on Shoal Bay Road, which was described as a 'narrow twisty road with open ditches and no sidewalks' and increased traffic with too many houses being 'filled in'.
- The impact on quality of life of existing residents and, potentially, property values.
- Insufficient infrastructure to respond to the potential expansion.
- Negative impacts on/ongoing diminishment of the agricultural areas; the land should be reserved for agricultural activity.

January 2025 – Amendment package prepared by staff

In addition to information provided previously and herein, this package details that the properties are within the Goulds Future Ultimate Service Area, and some additional rezoning is required for 'slivers' of land (generally along the rear of properties) to better align the zoning with property boundaries and where dwellings currently exist. This additional rezoning would involve change from the Rural (RUR) Zone and Rural Residential (RR) Zone to Residential 1 (R1) Zone, the Rural Residential Infill (RRI) Zone to Rural (RUR) Zone; and Rural Residential Infill (RRI) Zone to the Rural Residential(RR) Zone. Arising from these additional rezonings, the recommendations were amended as required.

This amendment package also highlighted that the R1 Zone will allow some infill in a manner that is consistent with surrounding dwellings. At full development potential,

approximately 65 lots could be added to this area. Given the variable lot depth and dwelling setbacks, the areas to be rezoned are deeper than what would typically be considered in a new R1 subdivision. This is to allow infill developments to have a similar setback to the adjacent existing dwellings.

In relation to the need for a comprehensive development plan, as the proposed rezoning is to consider infill lots only and no new streets would be considered, a comprehensive plan was not necessary.

Further, information in this amendment package noted that as per Section 4.9 of the St. John's Development Regulations, a Land Use Report is required for an amendment to the Municipal Plan or Development Regulations. However, where the scale or circumstances of the proposed development does not merit a Land Use Report, Council may accept a staff report in lieu. As the Plan amendment is to allow development along existing streets, the scale does not merit a Land Use Report.

February 4, 2025 – Correspondence from Ann-Marie Cashin, Planner III, Planning, Engineering and Regulatory Services to Kim Blanchard, MCIP, Department of Municipal and Provincial Affairs

This correspondence was a request from the City to the Department of Municipal and Provincial Affairs for Provincial review and release of the Envision St. John's Municipal Plan Amendment Number 15, 2025 and Envision St. John's Development Regulations Amendment Number 44, 2025. The amendment package referenced above accompanied this correspondence.

March 28, 2025 – Correspondence from Sean McGrath, Planner III, Department of Municipal and Provincial Affairs to, Ann-Marie Cashin, MCIP, Planner III, Planning, Engineering and Regulatory Services

This correspondence detailed that, in keeping with the requirements of section 15 of the Urban and Rural Planning Act, 2000, staff with the Land Use Planning and Local Governance Division reviewed the amendments and documentation provided by the City to determine any provincial or agency interests. Based on this review, the documents were released from provincial review on behalf of the Department. This correspondence further noted that Council could now consider the amendments for adoption and schedule a Public Hearing and the associated role/responsibilities for the Commissioner including in relation to final reporting.

April 2, 2025 – Correspondence from Ann-Marie Cashin, Planner III, Planning, Engineering and Regulatory Services, provided to the Regular Meeting of Council

This correspondence once again referenced the background to the rezoning of Main Road and Shoal Bay Road. Further, this correspondence informed the Mayor and Council that Provincial release had been issued for the Envision St. John's Municipal Plan Amendment Number 15 2025 and Envision St. John's Development Regulations Amendment Number 44, 2025. As such, it was recommended that Council could proceed with the next steps in the process to adopt the resolutions for the amendments, appoint Your Commissioner, and proceed with the hybrid Public Hearing.

Reference also was made to previous correspondence wherein it was noted that at this stage, following public consultation and when the amendments were being recommended for adoption, more information would be provided on the comprehensive development plan. To that end, it was stated that a comprehensive development plan must be prepared prior to development in the Urban Expansion District and more generally that discussions of traffic and reserving public rights-of-way to backlands require more study. Staff recommended that the City prepare a neighbourhood (secondary) plan for Goulds to determine its future development potential and set out residential density and a future road network for undeveloped areas. The resulting Goulds Neighbourhood Plan would set out objectives for future growth in the next 10 years.

New/Updated Key Considerations/Implications

Budget/Financial Implications: The Goulds Neighbourhood Plan will use funds from the federal Housing Accelerator Fund, as it will open new lands for residential development

Partners or Other Stakeholders: Property owners, residents, farmers and other business owners in Goulds

Recommendation

The recommendations accepted by Council were to:

1. adopt the resolutions for Envision St. John's Municipal Plan Amendment Number 15, 2025 and Envision St. John's Development Regulations Amendment Number 44, 2025 and appoint Marie Ryan as commissioner for a public hearing on the amendments. The proposed date is Monday, May 5, 2025, at 7 p.m. at St. John's City Hall.
2. direct staff to prepare terms of reference for a Goulds Neighbourhood Plan

3.0 Written Submissions Received During Comment Period

As highlighted earlier, five written submissions (email) were received regarding the rezoning of Main Road and Shoal Bay Road, three of which expressed concerns, including some referenced earlier during the public engagement period. The remaining two were primarily asking about whether specific streets were included, and staff responded to these emails.

The following provides a summary of the issues referenced in the three submissions, the full text of which is found in Appendix A.

- Safety on Shoal Bay Road – a narrow, meandering road, with no sidewalks, open ditches; not suitable for additional traffic.
- Reducing property values for existing houses – with infill housing on smaller lots.
- Insufficient information about what is next following rezoning and how it will impact e.g., property usage and taxes.

4.0 The Hearing

Your Commissioner explained the intent of the hearing to those participating and spoke to the process to be undertaken during the course of same, i.e., the amendments being proposed by City staff, an overview of the submissions received and presentation by/questions from any in attendance (in-person or via Zoom) who desired to express their support or objections/concerns regarding the amendments under consideration.

4.1 Overview of the Application

Ms. Ann-Marie Cashin, MCIP, Planner III, Planning, Engineering and Regulatory Services presented the proposed amendments to the St. John's Municipal Plan and St. John's Development Regulations in relation Main Road and Shoal Bay Road as detailed previously.

She displayed a view of the subject area and noted that:

- Zoning changes to R1 would align the subject areas with other proximal areas of Goulds which are primarily R1 (along Main Road and further north). The R1 Zoning would allow any of a range of uses permitted in this Zone.

- As the RRI Zone was digitized based on older paper maps, there was misalignment of zoning with some property boundaries. The proposed amendment would address this issue – as per the ‘slivers’ of land previously discussed – better aligning zoning to property boundaries.
- The R1 Zoning would extend to the rear of properties where appropriate, but not in all cases given how deep some rear lots are.

Ms. Cashin referenced the improvements to the municipal sewage systems in Goulds as discussed herein, and that this potentially opens new land for development – i.e., serviced lands fronting on civic addresses (as identified) on Shoal Bay Road and Main Road, and located within the Goulds Future Ultimate Service Area, with subdivision of land considered on a case-by-case basis. Any proposed development would need to meet all applicable and required standards including lots having sufficient frontage and area.

In closing, she provided a graphic showing the municipal amendment process and where the current application was on this continuum. Ms. Cashin overviewed the next steps, i.e., the Commissioner would prepare a report to Council with recommendations; however, the authority lies with Council to accept or reject the recommendations and approve or reject the amendments. If the amendments were approved, they would be forwarded to the Province for registration.

4.2 Overview of the Submissions

Your Commissioner explained that there were five submissions received from city residents in relation to the proposed amendments for Main Road and Shoal Bay Road. She provided a summary of their comments, which are presented in Section 3.0.

4.3 Presentations by those in Attendance

The following comments were provided by attendees at the hybrid session in relation to the proposed amendments for Main Road and Shoal Bay Road. Note that if a speaker spoke multiple times, their comments are compiled.

Speaker #1: The first speaker identified as living on Lakeview Drive for many years, noting this was probably the second or third side street in Goulds. They said they have a small piece of residential property/land on the street for which they have been paying taxes for years. This undeveloped property is located between two existing residences.

The speaker highlighted that there had been two versions of the map of the area for proposed rezoning. They would like to see the proposed property boundary on the right side (east) of Lakeview Drive reflected on the left (west) side as this would “accurately represent the property boundary” and be “fair and consistent”, as on the other version of the map, the boundary is described as being “out about two or three feet”. The speaker felt that this also would provide a better likelihood of being able to develop this property.

Speaker #2: The second speaker also referenced a difference in the maps sent in the mail to property owners vs the map provided online.

This speaker said they were in support of the development but wanted to know the “bigger picture” in relation to the development.

They felt that to rezone the properties fronting on the two roads in question without knowing the “whole picture” could result in some unforeseen consequences. For example, they said that there is a considerable amount of land behind the area to be rezoned, and the amendments might block access to these lands unless there is a plan to develop the Back Line. They did not express a concern about agricultural land, noting most is on the back side and closer to the arterial road.

Response from Ms. Cashin:

Ms. Cashin appreciated the concern about rezoning with no apparent future plans. However, she highlighted that Council has directed staff to create a terms of reference for a Goulds Neighbourhood Plan, stating that these are generally in place within about 18 months. It also was identified that the current rezoning is an interim measure while the plan is being developed - by end of 2026, there will be clarity around for example, expansion of roads, development, and what agricultural areas need to be further protected. The neighbourhood plan will be developed with multiple opportunities for consultation.

This speaker then asked about subdividing lots – with the specific question in relation to what would happen if the front of a property was owned by one individual and the back by a different individual?

Response from Ms. Cashin:

Ms. Cashin reiterated that potential subdivision of land would be addressed on a case-by-case basis referencing the need for 30m frontage for two lots. She stated that in some cases, specific requests could be at the discretion of Council - in particular if there is existing access to a back lot area.

5.0 Considerations

In reaching a conclusion on the merits of the proposed amendments, Your Commissioner considered the following information.

5.1 Consistency with the Envision St. John's Municipal Plan

5.1.1 Chapter 2 - Framework for Growth

As detailed in Section 2.2 – Growth and Development Strategy of the St. John's Municipal Plan the approach is to balance growth with several factors including overall neighbourhood health:

- Identification of undeveloped areas that are able to accommodate future, well-planned growth, an emphasis on encouraging intensification [...]

Section 2.3 articulates the vision for the city including:

[...] This city has active, healthy citizens, living in affordable, accessible, complete neighbourhoods. [...]

As presented in Section 2.4, the Municipal Plan has five key themes including 'Healthy Neighbourhoods'. Input during the public consultation reflected on healthy neighbourhoods:

Input from public consultations on the Plan indicate a desire for a city of healthy, walkable neighbourhoods with access to local services. There was also recognition that a greater mix of uses, and higher density residential development will be required to support such initiatives. [...] Neighbourhoods change and evolve over time, therefore it is the City's intent to implement policies that maintain the essential character of the neighbourhood, while allowing appropriate growth and development. [...]

5.1.2 Chapter 4 – Healthy Neighbourhoods

The goal in relation to healthy neighbourhoods includes designing neighbourhoods with a range of housing options.

Section 4.1 Housing

Strategic objectives laid out in Section 4.1 Housing include:

- Encourage a range of housing options that contribute to community health, sustainable growth and economic security.

- Identify appropriate areas for future growth and development that take advantage of existing infrastructure and services, which would in turn create financial efficiencies and limit urban sprawl.
- Limit impacts to established neighbourhoods, heritage districts and employment areas.

Section 4.3 Enhancing Neighbourhood Character

Section 4.3 states:

Over the next decade, additional growth will be encouraged within developed areas of the city through intensification and redevelopment in targeted areas along identified corridors and at key nodes. Such change can affect adjacent established residential neighbourhoods. As a result, attention to urban design will be required so that development can be achieved in a manner that enhances and adds value to the character of existing neighbourhoods.

One action to achieve this result is stated to be:

4.3.2 Ensure that infill development complements the existing character of the area.

5.1.3 Chapter 6 – Urban Design

Section 6.2 - Secondary Plans identifies that such plans are 'used to engage detailed planning and analysis at the neighbourhood level, within the broader framework of the Municipal Plan'. It was stated that during public consultations for the Plan 'citizens expressed an interest in being able to discuss decisions that affect their neighbourhoods and a need for more planning at the local level.' Goulds is included as one such neighbourhood planning area.

5.1.4 Chapter 7 – Transportation and Infrastructure

The Goal as per these issues areas, and as set out in this Chapter, is to:

Support growth and development in the City through an efficient and effective transportation network and investment in municipal infrastructure.

Section 7.5 Water and Wastewater Servicing

This section overviews the need to ensure that there is efficient use of existing water and wastewater systems to reduce costs of constructing new systems.

[...]

2. Ensure that new development is connected to full municipal water and wastewater services, unless located in a designated un-serviced area with frontage on an existing public road (prior to January 1, 1992).

Section 7.8 Goulds Ultimate Service Area

This Section identifies that development in Goulds is limited by capacity in the existing wastewater system. The relevant map in the Plan (Map P-5) shows the current service area and lands for future urban expansion. Relevant policies cited include:

- Continue to upgrade and improve capacity of the wastewater system in the Goulds Ultimate Service Area. [...]
- Any development within the Goulds Ultimate Service Area must be developed to full City standards in accordance with the City's Subdivision Development Policy

5.1.5 Land Use Districts and Redesignation

5.1.5.1 Land Use Districts

Urban Expansion Land Use District

Section 8.15 of the St. John's Municipal Plan overviews the Urban Expansion Land Use District. This Land Use District does not contemplate residential uses. As the name implies, it speaks to lands identified for future urban expansion. In relation to Goulds, it is stated that this area is identified for development when infrastructure is extended and/or upgraded. Further, it is cited:

- A Comprehensive Development Plan must be prepared and approved by Council prior to development of all Urban Expansion areas.

[...]

- Lands in the Urban Expansion District in Goulds may be developed in accordance with the Goulds Ultimate Service Area as shown in Appendix A, P-5

Rural Land Use District

While the primary designation of the subject area is Urban Expansion Land Use District, small areas also fall under the Rural Land Use District. This district is described as being applied to lands outside of the urban core and those not intended to be settled for urban development within the planning period.

Residential Land Use District

Section 8.4 overviews the Residential Land Use District, which considers a range of housing options.

The Residential Land Use District applies to established and developing residential neighbourhoods of the city. Residential neighbourhoods should contribute to the maintenance and improvement of quality of life through housing design and variety of form, good subdivision design, effective management of non-residential land use and appropriate infill. [...]

As per policies related to Residential Neighbourhoods:

Policy 8.4.2 - Recognize and protect established residential areas. Support the retention of existing housing stock, with provision for moderate intensification, in a form that respects the scale and character of the neighbourhood.

Policy 8.4.3 - Support neighbourhood revitalization, redevelopment and residential infill that contributes to the livability and adaptability of established neighbourhoods. [...]

Policy 8.4.11 - Promote the development of infill, rehabilitation, and redevelopment projects, thereby better utilizing existing infrastructure. [...]

5.1.5.2 *Redesignation of the Subject Property*

To accommodate the potential residential development on the identified areas of Main Road and Shoal Bay Road, a zoning change is required as detailed earlier. Rezoning the subject property would require a redesignation from the Urban Expansion Land Use District and Rural Land Use District to the Residential Land Use District.

5.1.6 Chapter 9 - Implementation

Section 9 of the St. John's Municipal Plan sets out considerations for planned growth in the city. This includes Section 9.5 Considerations for Rezoning which states that, in considering requests for rezoning, Council shall consider all appropriate policies set out in this Plan and have regard for the following:

[...]

The adequacy of municipal water and sewer services, or where on-site services are proposed, the adequacy of the physical site conditions to accommodate it [...]

Whether the proposed use will alter the intended mix of land uses in the District or neighbourhood. [...]

Section 9.7 The Land Use Report

Section 9.7 describes the Land Use Report as 'a valuable tool in the review of proposals for a development or use that cannot be adequately evaluated by City staff.' This section further notes that 'Council may deem that a Staff Report constitutes a Land Use Report where the scale or circumstances of a proposed change or development proposal does not merit extensive analysis.'

5.1.7 Chapter 10 Secondary Plans

Section 10.6 Planning Area 16 encompasses the former Town of Goulds. The general development objective for the Goulds Planning Area is 'to maintain a community that includes both urban and rural development values [...]'.

Policies include:

- *Urban expansion*

The Urban Expansion Area of Goulds Planning Area [...] comprises lands that could be serviced with extensions to the present municipal water and sewer systems.

- *Municipal Servicing*

[...]. Only when the municipal sewerage system is functioning to City standards, and is deemed to be capable of operating to its initial design capacity, will it be allowed to be extended into the Urban Expansion District. As portions of this District become serviceable, the City will seek amendments to the Municipal Plan to place the affected properties within an appropriate Urban Core land use district.

5.2 Alignment with the St. John's Urban Region Regional Plan

The subject area is primarily within the Urban Development designation of the Regional Plan which notes, for Regional Centres, that 'the entire range of urban uses shall be permitted on the basis that piped water, sewage collection, storm drainage, paved roads and street lightning will all be provided.'

However, a small portion of land at the rear of some properties along Main

Road, as well as the rear of 74 Shoal Bay Road, are within the Rural designation in the SJURRP. The SJURRP addresses instances such as this circumstance via Section J.

Implementation (2) which allows the general policies of the Regional Plan to be varied and the land use pattern modified in the detailed plans to suit the particular

circumstances involved, provided that the general intent of the Regional Plan is maintained.

As such, the proposed residential development identified in the amendments continues to align with the Urban Development policies and the intent of the Regional Plan.

Additionally, and as noted earlier, the slivers of Rural designation at the rear of the properties are a result of different scales being applied to the original paper Regional Plan maps, compared to the digital mapping used today. The associated amendment undertaken to better reflect the property boundaries and where the line between the Urban Development designation and Rural designation should be applied do not contravene policies of the SJURRP.

In summary, and as detailed in the January 2025 amendment package, the proposed Municipal Plan and Development Regulations amendments are identified as being in line with the SJURRP and, so, an amendment to this Plan is not required.

5.3 Envision St. John's Development Regulations

5.3.1 Proposed amendments

Under the Envision St. John's Development Regulations, the subject properties (the primary focus of the amendment) on Main Road and Shoal Bay Road are located within the Rural Residential Infill (RRI) Zone. This Zone does allow single detached dwellings as a permitted use but on large lots and within the context of zone standards which would not contemplate subdivision of properties to accommodate additional single detached dwellings.

With the upgrades to the sewer system, the area can now be considered for a different form of housing and zoning (R1) to open the opportunity for subdividing properties to increase the housing density in the subject areas.

The other rezoning highlighted under this amendment, as discussed herein, is to align the zoning with property boundaries (generally along the rear of properties) and where dwellings currently exist: changes from Rural (RUR) Zone and Rural Residential (RR) Zone to the Residential 1 (R1) Zone, the Rural Residential Infill (RRI) Zone to Rural (RUR) Zone; and Rural Residential Infill (RRI) Zone to the Rural Residential (RR) Zone.

5.3.2 Zoning considerations

No significant zoning considerations were identified in relation to the City initiated amendments to allow serviced development along Main Road and Shoal Bay Road.

5.3.3 Section 4 General Development Procedures

Subsection 4.9.2 (a) identifies that 'where a Land Use Report is required, but in the opinion of Council the scale or circumstances of the proposed Development does not merit a Land Use Report, Council may accept a staff report in lieu of the Land Use Report.'

As previously stated, the rationale to accept a staff report without requiring a Land Use Report in relation to the proposed amendments was detailed in the amendment package.

6.0 Conclusion

In reaching a conclusion on the merits of the proposed Amendments, Your Commissioner considered the following:

6.1 Consistency with the Envision St. John's Municipal Plan

Overall vision and approach

As discussed in the St. John's Municipal Plan, the vision is that St. John's has active, healthy citizens, living in affordable, accessible, complete, and healthy, quality neighbourhoods, that provide for walkable access to local shops and services. It is recognized that to achieve such neighbourhoods, a greater mix of uses and higher density residential development will be required.

The Plan also highlights that appropriate areas for future growth and development should take advantage of existing infrastructure and services and be connected to full municipal water and wastewater services. Further, infill development should complement the existing character of the area.

Lands in the Goulds Urban Expansion District are identified for future service urban expansion when infrastructure is available. The area proposed for rezoning is primarily in this area. The sewer upgrades now allow the area to be fully serviced and so can be considered for a different form of housing development – R1.

Of note, is that through Municipal Plan policies, the City continues to upgrade and improve capacity of the wastewater system in this area and support extension of infrastructure into the future service area in a progressive manner, to accommodate fully serviced development.

Residential Land Use District

Future development arising from the rezoning also is intended to meet the intent of Residential Neighbourhoods as described for the Residential Land Use District: supporting moderate intensification, in a form that respects the scale and character of the neighbourhood; supporting neighbourhood redevelopment and residential infill that contributes to the livability and adaptability of established neighbourhoods; and maximizing use of existing infrastructure.

Redesignation

The proposed rezoning of specific areas of Main Road and Shoal Bay Road is consistent with the vision, intent and direction of the St. John's Municipal Plan – supporting opportunities for increased density/infill and increasing the housing stock where existing infrastructure can be accessed, thereby taking a planned and measured approach. Redesignation of the subject property from the Urban Expansion Land Use District and Rural Land Use District to the Residential Land Use District is appropriate.

6.1.1 Mitigation of Impacts in Relation to the Amendments or issues raised

As detailed in this report, the amendments are to facilitate potential residential infill in the subject areas. Any potential issues such as increased traffic would be addressed at the development stage of any proposed development.

Rezoning without a specific proposal for development

It is important to speak to this issue, as it was raised over the course of the public engagement and Public Hearing process and reflects the integrity of the municipal planning process. While there is no specific plan proposed, the subject property is being rezoned to enable residential development. The Development Regulations outline the permitted and discretionary uses for the proposed Residential 1 (R1) Zone, as well as the related lot requirements and stipulations for particular uses. Council's decision to allow rezoning, therefore, is based on the knowledge of what could be permitted – which allows for some early consideration of synergies with, and potential impacts on, adjoining and existing properties in the area.

Additionally, another 'decision' point, following an approved rezoning and proposal for development, is the detailed design phase which would require a property owner/developer to submit their plans, including how they will align with related standards.

Further and as detailed in the April 2, 2025, Decision Note to Council, it is identified that there is more study required in relation to potential development arising from the amendments. This led to the staff recommendation, as referenced earlier, that there be a neighbourhood (secondary) plan for Goulds prepared to determine its future development potential and set objectives for future growth in the next 10 years.

7.0 Recommendations

Based on the foregoing considerations, Your Commissioner recommends the following:

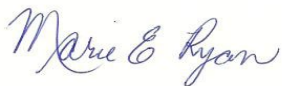
Acceptance of the Envision St. John's Municipal Plan *Amendment Number 15, 2025*

Redesignating land along Main Road and Shoal Bay Road, Goulds, from the Urban Expansion Land Use District and Rural Land Use District to the Residential Land Use District

Acceptance of the Envision St. John's Development Regulations *Amendment Number 44, 2025*

Rezoning land along Main Road and Shoal Bay Road, Goulds from the Rural (RUR) Zone, Rural Residential Infill (RRI) and Rural Residential (RR) Zone to the Residential 1 (R1) Zone, from the Rural Residential Infill (RRI) Zone to the Rural (RUR) Zone, and from the Rural Residential Infill (RRI) Zone to the Rural Residential (RR) Zone

RESPECTFULLY SUBMITTED THIS 22ND DAY OF MAY 2025



Marie. E Ryan,
Commissioner

Appendix A

Written Submissions

Theresa K. Walsh

From: [REDACTED]
Sent: Thursday, April 24, 2025 8:47 AM
To: CityClerk
Subject: Rezoning of Shoal Bay Road, Goulds

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

CAUTION: This is an EXTERNAL email. Do not click on any link, open any attachments, or action a QR code unless you recognize the sender and have confirmed that the content is valid. If you are suspicious of the message use the **Report a Phish** button to report it.

Hello, I have some concerns with the rezoning of Shoal Bay Road. This road is very narrow ,twisty Turney, with NO sidewalks, and steep open ditches. This is a dead end road(only one way in and out) . The Metrobus uses this road as a turnaround, the ATV 's and hikers use it as a way to get to East Coast Trail. There are alot of people who walk their pets in this road, and have to dodge all the traffic because they are walking on the road due to the fact that there are NO sidewalks and very steep open ditches.

In the night time it is dangerous to walk, because it is so dark with very little street lights, open ditches, speeders, ATV'S, Metrobus taking up the whole road ,as well as the many trucking and construction companies that are based on Shoal Bay Road, not to mention the residents of the road.

I also have concerns about property values, if you allow smaller lot sizes and in fill housing, it would lower the value and desirability of properties in this area, and possibly add to more crime.

Quality of life should matter as well. This is an older road, with many residents living here a long time or choosing to live here because of the country feel, with much spacing between properties. By rezoning you are taking away all of the reasons the residents chose to stay or move to this area. If I wanted the traffic, close property lines and crime, I could have saved money and moved to a densely packed subdivision.

Before you rezone and take away all the reasons the residents chose to live here, you should address some of the problems in the area: No sidewalks, Many residents have no water or sewer, many areas with no fire hydrants ,high traffic volumes on a narrow, twisty ,turney road with steep ditches, overcrowded schools, very little recreation (we have to go to another city (My. Pearl) for many of our after school/recreation programs), Very little street lights. No fire services, no police, no first responders. We are serviced like a rural area, but you want to densely populate us like the big city.

I LOVE my neighborhood and find it hard enough to [REDACTED] Please do NOT add more traffic to an already overwhelmed road. Think of the residents and service them better before adding more people to an already overcrowded and underserviced community.

Thank you
[REDACTED]

Theresa K. Walsh

From: [REDACTED]
Sent: Wednesday, April 30, 2025 3:16 PM
To: CityClerk
Subject: Comments on Goulds rezoning (for Meeting Monday May 5th)

You don't often get email from [REDACTED]. [Learn why this is important](#)

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There is a section of land going along Howletts Line that is up for re-zoning. It was bought by [REDACTED] and they have been clearing it the past few years as though they just knew it was going to be re-zoned.
I would bet he bought it for pennies on the dollar and will now re-sell it at top cost.
City corruption at its finest!!

Theresa K. Walsh

From: [REDACTED]
Sent: Thursday, May 1, 2025 5:51 PM
To: CityClerk
Subject: Planning development. Helena Road

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Hi,
Just inquiring as to why Helena Road is involved in the Planning Phase. Helena Road is a private road.

[REDACTED]

[REDACTED]

Thank You

[REDACTED]

Theresa K. Walsh

From: [REDACTED]
Sent: Sunday, May 4, 2025 12:13 PM
To: CityClerk
Subject: Rezoning Comments

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Good afternoon,

I would like to add the following questions/comments with respect to the planned rezoning in the Gould's:

1. Why has Alexis Place remained zoned for Rural Residential, requiring one acre?
2. The rezoning planned will open all land around Alexis Place, has there been consideration given to the decreasing property values for the residents on Alexis Place who will be surrounded by 50x100 building lots, commercial developments, or subdivisions yet these residents still require an acre.
3. With the new block of land behind Alexis Place being opened for development, will the city reconsider rezoning Alexis Place to Rural Residential Infill, therefore requiring 1/2 acres lots to match every other residential street in the area. There have been previous requests by the residents for this rezoning. Walt Mills informed the residents rezoning was not an option as it would be considered "spot zoning", however now Alexis Place is the spot zone with everything else in the area rezoned. The only red on the map, is Alexis Place. The provincial regulation requires 1/2 acre for properties with well and septic, why then does Alexis Place require one acre.
4. If the city will not consider the rezoning for Alexis Place, can you please provide rationale, and allow the residents the opportunity to provide feedback. Can you also provide reasons why some of the areas on Thornburn Road, with well and septic, which are zoned RR, have less than an acre.

Thank you
[REDACTED]

Sent from my iPhone

Theresa K. Walsh

From: [REDACTED]
Sent: Monday, May 5, 2025 8:57 AM
To: Planning; CityClerk
Subject: Main Road & Shoal Bay Road

Some people who received this message don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This is an EXTERNAL email. Do not click on any link, open any attachments, or action a QR code unless you recognize the sender and have confirmed that the content is valid. If you are suspicious of the message use the **Report a Phish** button to report it.

hi ,

I had some questions about the land rezoning . Right now its for the frontage but what is the long term plan/ development ? as it's challenging to make informed decisions without the full picture. I've made several calls to planning without much success is discussing this with anyone.

As a resident, business owner and landowner in the Goulds, I see the need for development and both support & encourage it.

I also have some concerns about the overall town plan? How will this affect my property ? usage? taxes ? etc