COMMISSIONER'S REPORT ON THE

ENVISION ST. JOHN'S MUNICIPAL PLAN AMENDMENT No. 22, 2026

and

ENVISION ST. JOHN'S DEVELOPMENT REGULATIONS AMENDMENT No. 72, 2026

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1.0 Introduction

At the Regular Meeting of the St. John's Municipal Council ('Council') held on April 7, 2026, 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 22, 2026)* and Envision St. John's Development Regulations *(Amendment Number 72, 2026)*. The intent of these amendments is as follows:

Envision St. John's Municipal Plan *(Amendment Number 22, 2026)*

> Redesignating land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Urban Expansion Land Use District to the Residential Land Use District

Envision St. John's Development Regulations *(Amendment Number 72, 2026)*

> Rezoning land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Residential Rural (RR) Zone to the Apartment 1 (A1) Zone

This redesignation and rezoning of 746 Blackmarsh Road are in response to an application to allow a Cluster Development on the subject property.

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 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 746 Blackmarsh Road was scheduled for 7 p.m. on Wednesday, May 6, 2026 – in-person and via Zoom.

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[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.

Prior to this date, and as required by legislation, the amendments were advertised in the April 17, April 24 and May 1, 2026, editions of The Telegram. Additionally, the amendments were publicized on the City of St. John's website (https://www.stjohns.ca/en/news/public-hearing-746-blackmarsh-road.aspx), and background information on the amendments was available from the Engage St. John's project page (https://www.engagestjohns.ca/746-blackmarsh-road). 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 and posted in two places considered conspicuous in the area impacted. 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 4, 2026. The hybrid session was convened, as planned, on Wednesday, May 6, 2026, at 7 p.m. There were up to 23 residents in attendance at various times during the hearing, both online and in person. In addition to Your Commissioner, also in attendance were three members of Council (online or in person), one member of the Department of Planning, Engineering and Regulatory Service, and three representatives of the applicant.

Over the submission period, prior to the Public Hearing,12 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 B.

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, as noted above:

- **Envision St. John's Municipal Plan *(Amendment Number 22, 2026)***

  Redesignating land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Urban Expansion Land Use District to the Residential Land Use District

- **Envision St. John's Development Regulations *(Amendment Number 72, 2026)***

  Rezoning land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Residential Rural (RR) Zone to the Apartment 1 (A1) Zone

2.0 Background

2.1 The Application

The City received an application from the NL Department of Transportation and Infrastructure on behalf of Tucker Group Inc., to rezone land at 746 Blackmarsh Road from the Rural Residential (RR) Zone to the Apartment 1 (A1) Zone for a Cluster Development. The applicant is proposing to develop three Apartment Buildings with a total of approximately 45 units and a building height of 12 metres.

The area is immediately north of the Cowan Heights neighbourhood of mostly single detached dwellings. The subject property is a vacant, primarily treed lot. A portion of the lot was cleared between 2015 and 2017, but no development occurred at the time. This lot is contained within a larger parcel that extends over 550 metres from Blackmarsh Road toward George's Pond. The Province is considering divesting the front of the parcel between Blackmarsh Road and the Team Gushue Highway for this proposed development. Should the application proceed, the land will be subdivided and only the portion to be developed will be rezoned.

This will be an affordable housing project. The applicant is the recipient of Newfoundland and Labrador Housing Corporation's Affordable Rental Housing Program.

2.2 The Review Processes

The following provides an overview of the relevant correspondence and activity related to the processing of the application for rezoning requiring the amendments referenced earlier.

November 25, 2024 – Correspondence from Ann-Marie Cashin, MCIP, Planner lll to the Committee of the Whole (considered at a December 10, 2024, Council meeting)

Background and Current Status

This correspondence to the Committee of the Whole outlined the proposed text amendments to the St. John's Municipal Plan and Development Regulations related to the application for rezoning land at 746 Blackmarsh Road from the Rural Residential (RR) Zone to the Apartment (A1) Zone for a Cluster Development – an affordable housing project consisting of three apartment buildings with a total of approximately 45 units and a building height of 12 metres.

It also described the size of the parcel of land and noted, as described above, that the Province is considering divesting a parcel of land between Blackmarsh Road and the Team Gushue Highway for this proposed development. Should the application proceed, the land will be subdivided and only the portion to be developed will be rezoned.

Alignment with Envision St. John's Municipal Plan

The correspondence details the proposal's alignment with the Municipal Plan citing the parcel is within the Urban Expansion District, which requires a comprehensive development plan approved by Council prior to development. The comprehensive plan will be prepared within the Cowan Heights Neighbourhood Plan process now underway. As there is a need for affordable housing, this application was being brought forward for consideration while the neighbourhood plan is still being prepared.

The Municipal Plan enables a range of housing, including affordable housing, to create diverse neighbourhoods and increase density in existing neighbourhoods. Section 4.1 has the following policies, all of which are met by the proposed development - supporting the City's Affordable Housing Strategy, 2019-2028, enabling a range of diverse housing, and promoting housing choice by supporting residential development that is appropriate, accessible and affordable for low-income and moderate-income households.

This correspondence also stated that municipal services will need to be extended across the front of the property.

Land Use Report

It was identified that a draft terms of reference for a land use report were provided for consideration as Section 4.9(2)(a) of the Envision Development Regulations requires a land use report (LUR) for rezonings. (Note: the draft Terms of Reference are found in Appendix A of this report.)

Further it is stated that should Council consider the amendments and approve the terms of reference for the LUR, the applicant will have to consult with the neighbouthood before submitting the report.

Key Considerations/Implications

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

- Partners or Other Stakeholders: Neighbouring residents and property owners.
- 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: Envision St. John's Municipal Plan and Development Regulations
- Legal or Policy Implications: Map amendments to the Municipal Plan and Development Regulations are required for the proposed development.
- Engagement and Communications Considerations: Engagement will be carried out in accordance with Section 4.8 of the Development Regulations.

Recommendations

That Council consider rezoning 746 Blackmarsh Road from the Rural Residential (RR) Zone to the Apartment 1 (A1) Zone for a proposed Cluster Development. This will also require a Municipal Plan amendment. Further, upon receiving a satisfactory Land Use Report (LUR), that the application be advertised for public input and feedback.

Public consultation (as detailed in the December 2025, 'Amendment Package' developed by City staff)

The proposed Municipal Plan and Development Regulations amendment was advertised on three occasions in The Telegram newspaper on November 21, November 28 and December 5, 2025. A notice of the amendment was also mailed to property owners within 150 metres of the application site, posted on the City's website and posted in two conspicuous places in the area affected.

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

The response to the public consultation included both email and comments on the 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.

As was noted in the Amendment Package referenced above, and as observed by Your Commissioner, the comments/submissions received (10 in total – November/December 2025) were by majority supportive in nature. Those in support mainly referenced the

need for more affordable housing, with one noting the "relatively central location is an excellent place". Of those expressing support, some also identified caveats or concerns – e.g., the development should ensure there are no negative environmental consequences, will the bus service be improved in the area, and concerns with this development increasing traffic pressures and potential danger at the intersection of Canada Drive and Blackmarsh Road.

Others who did not express support and/or who had questions cited the following:

- Width of the road, sidewalks and foot traffic - e.g., the area for the proposed development is a narrower section of Blackmarsh Road, with no sidewalks, and with the potential for increased foot traffic to access the nearby bus stop. Will there be improvements to offset these concerns – e.g., widened road, sidewalks/crosswalk in the area?
- Loss of natural landscape/trees – the need to weigh the development against what could be lost.
- The proposed development would be better suited to an area of the City closer to shops and amenities, as reliance on public transportation is not optimal, despite the presence of bus stops in the area.

February 18, 2026, Land Use Report, Proposed 3 Apartment Buildings, 746 Blackmarsh Road, St. John's NL – submitted by SPS Consulting Inc. on behalf of Tucker Group Inc.

As stated previously, the City required an LUR to be completed for the proposed development of 746 Blackmarsh Road. As defined in the Envision St. John's Development Regulations, an LUR is "a report prepared by suitably qualified person(s) to identify and assess the impacts of a proposed land use or Development on the urban environment and/or surrounding lands or neighbourhood, and includes recommendations and proposals to control and mitigate identified impacts […]."

The City also stipulated the Terms of Reference for this LUR (see Appendix "A"), as per the November 25, 2024, correspondence. The LUR presents an introduction to, and overview of, the proposed redevelopment, as described previously, and includes:

> " […] The current owner and developer, Tucker Group Inc., is proposing to develop the property into three (3) apartment buildings with fifteen (15) two-bedroom units per building for a total of forty-five (45) units. Designed for seniors (50+) with an affordability component, the proposed buildings are identical and therefore all building specifics mentioned in this report, though they may refer to

one building, they will apply to all. Where the word “building” appears in this report, it shall mean all 3 buildings.”

Key information responding to the Terms of Reference, includes the following.

Public Consultation

The LUR states that “on or about April 17, 2025, the owners started distribution of flyers (provided in the LUR) to homes in the immediate area advising of the proposed development.” The time frame for receiving comments was until April 27, 2025, and comments could be provided via email or through their website. No feedback was received.

Building Use

This section sets out the size of the buildings and units. Each of the three buildings will contain 15 two-bedroom units (five per floor), and no shared or public amenities. Additionally, each building will contain one accessible unit per floor.

Elevation and Building Height

The Building will be 12m in height.

Site Location and Lot Layout

This section notes that the proposed apartment buildings have a rectangular footprint and larger setbacks than required, with the closest neighbouring building being 756A Blackmarsh Road - 55m from the southwest property boundary.

Landscape, Buffering and Snow Clearing/Storage

The LUR states that the intent is only to remove trees which could conflict with the site layout. While the general intent for landscaping is shown, it is identified that a detailed site design will be developed later in the process.

The site has sufficient space for snow storage.

Exterior Equipment and Lighting

It is stated there will be no exterior HVAC equipment, and lighting will be installed at the lowest possible elevation on the building to avoid spillover into neighbouring properties.

Transportation, Off-Street Parking and Access

There will be 68 parking spaces on site, as well as bicycle parking. The site plan shows one access point at Blackmarsh Road, with left and right turns permitted onto and off of the site.

Public Transit

It is identified that the property owner will consult with Metrobus to determine if extending their route to the subject property is feasible, as there is no proximal bus stop.

March 30, 2026 – Correspondence from Setare Vafaei, Planner lll, Department of Municipal and Community Affairs to, Ann-Marie Cashin, MCIP, Planner lll, 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 Local Governance and Land Use Planning Division reviewed the amendments and documentation provided by the City to determine any provincial or other government 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 proceed to adopt the amendments.

March 31, 2026 – Correspondence from Ann-Marie Cashin, Planner lll, Planning, Engineering and Regulatory Services, provided to the April 7, 2026, Regular Meeting of Council

This correspondence once again referenced the background to the rezoning of 746 Blackmarsh Road, and advised of the process for advertising the amendments, including the comments received, and that Provincial release had been issued for the Envision St. John's Municipal Plan Amendment Number 22, 2026, and Envision St. John's Development Regulations Amendment Number 72, 2026.

New and/or updated Key Considerations/Implications

- Alignment with Strategic Directions:

  An Effective City: Ensure accountability and good governance through transparent and open decision making.

- Engagement and Communications Considerations: The public hearing will be advertised in accordance with the Development Regulations.

The recommendations accepted by Council were to:

> "…adopt the resolutions for Envision St. John's Municipal Plan Amendment Number 22, 2026 and Envision St. John's Development Regulations Amendment Number 72, 2026 and appoint Marie Ryan as commissioner for a public hearing on the amendments. The proposed date is Wednesday, May 6, 2026, at 7 p.m. at St. John's City Hall."

Also included in the above noted correspondence was the **December 2025 Amendment Package** developed by staff. Information from this package mirrors much of what has been explained in this section on the review process. Additional information from this package will be referenced in subsequent sections of this report, as necessary.

3.0 Written Submissions Received During Comment Period

As highlighted earlier,12 written submissions (email) were received regarding the rezoning of 746 Blackmarsh Road. Of those received, two were in support; seven were opposed, and three expressed concerns, including some referenced earlier during the public engagement period.

The following provides a summary of the issues referenced in the 12 submissions, the full text of which is found in Appendix B.

- High density and/or low-income housing would change the nature of the residential area and could result in lowered property values, and increased crime; low income/social housing is often poorly maintained and unsustainable in the long-term.
- Higher density development also could result in increased stormwater run-off, negatively impact sewer systems, reduce green spaces/tree cover and disrupt local habitat. It could set a precedent for other such intensification, further detracting from the current low density residential nature of the area.
- An apartment building could discourage future opportunities for rural residential development in the area.
- The City has more focus on creating a city of renters, resulting in families seeking housing in neighboring communities; this development will not bring children and families into the area.
- Residential dwellings are more beneficial to the City from a tax base perspective.

- Potential for increased rodents arising from clearing the land, as well as damage to existing dwellings and structural integrity, in particular in relation to older homes and arising from potential blasting.
- Loss of privacy in rear yards of existing residences and residents.
- Traffic and pedestrian safety: the development will be across from the Blackmarsh Road/Canada Drive intersection resulting in another access point and increased car and foot traffic on a road network not designed to accommodate such an increase. Additional infrastructure – such as sidewalks, dedicated turning lanes, traffic lights and/or traffic calming measures might be needed.
- The proposed development would be better suited to another area, including other A1 Zone locations, which are amenable to such development and/or areas where residents have easier access to needed amenities.

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 lll, Planning, Engineering and Regulatory Services, presented the proposed amendments to the St. John's Municipal Plan and St. John's Development Regulations in relation to 746 Blackmarsh Road.

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

- The City received an application from the NL Department of Transportation and Infrastructure on behalf of Tucker Group Inc., to rezone land at 746 Blackmarsh Road from the Rural Residential (RR) Zone to the Apartment 1 (A1) Zone for a Cluster Development, comprising three buildings and 45 units. Access would be from Blackmarsh Road.
- The property in question is a portion of land fronting on Blackmarsh Road, owned by the Province. Should the rezoning proceed, this portion would be subdivided from the larger main portion.

- Traffic studies show a traffic signal is not warranted but there will be alignment of the existing intersection of Canada Drive and Blackmarsh Road to mitigate conflicts with existing turning movements. The applicant has been advised they will have to add a crosswalk at the intersection.
- 68 parking spaces will be provided which is in line with the St. John's Development Regulations.
- For stormwater, a detention pond will be provided on site, as this is required.
- The proposed greenspace meets the City's requirements.

Ms. Cashin also overviewed NL Housing's Affordable Rental Program, of which the proponent is availing for this development.

In closing, 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 12 submissions received from city residents in relation to the proposed amendments for 746 Blackmarsh 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 Public Hearing in relation to the proposed amendments for 746 Blackmarsh Road. Note that if a speaker spoke multiple times, their comments were compiled.

It is important to state that some residents in attendance were confused as to the intent of the hearing. They received correspondence in late March/early April relating to the Cowan Heights Neighbourhood Plan, which referenced broader rezoning plans, and these residents thought the May 6, 2026, hearing was in relation to this plan.

Speaker #1: Speaker #1 said they needed answers to all of the issues which Your Commissioner overviewed from submissions received in advance of the hearing. They wondered why the hearing was referencing rezoning of only one parcel of land, noting the land in question extends back to George's Pond. This speaker wanted to know if the City was going to take all the frontage along Blackmarsh Road and turn it into

apartments and if other residential and development proposals were coming forward for the overall area.

This speaker also wondered what 'affordable' housing meant.

> *Ms. Cashin responded: Ms. Cashin explained that the Province has a program wherein they identify provincial land for affordable housing. In this particular case, the Province is considering giving over one parcel of land and that is the application that has been received.*
>
> *Ms. Cashin also referenced that NL Housing has defined what constitutes affordable housing, and their website contains information on rental amounts.*

The speaker asked if the Tuckers own any existing structures in St. John's and their maintenance history.

> *Response from Mr. Adam Tucker: He identified that the Tucker company is a family one. He has been a landlord for 20 years, having a few residential 2-apartment properties, and has always kept his properties up to standard. He further stated that keeping properties up is good for the property, the tenants and the neighbourhood.*

This speaker spoke a second time reiterating a question asked by another in attendance – related to if the apartment buildings were sold, would these still be for a 50+ target group.

Speaker #2: Speaker #2 wondered what happens to property values if the land in question is rezoned from a residential to an apartment zone.

> *Ms. Cashin responded: She stated that with respect to the question re property values, studies tend to show new development does not decrease property values.*

This speaker further wondered if the City's intention was to develop the entire Blackmarsh Road area as Cluster Development with apartment buildings, without a single residential dwelling, and would these all be low income. They said, if yes, this would restrict what residents would be able to sell.

> *Ms. Cashin responded: The entire section of Blackmarsh Road – north of Cowan Heights - is zoned Rural Residential. However, the only property to be rezoned currently, is a portion of this property. The Cowan Heights Neighbourhood Plan is planning for rezoning along this area, and this could include more apartments, but this is a long-term plan. She explained to those in attendance that this broader planning was not related to the rezoning under consideration.*

Speaker #3: Speaker #3 also sought clarification about recent correspondence referencing general rezoning along Blackmarsh Road. They said this letter was the first time they heard of such action. She felt more communication was needed when something this important was under consideration, highlighting that seniors may not be online looking for information.

> *Ms. Cashin responded: She tried to further distinguish between two distinct activities, both of which are currently ongoing. She explained that the correspondence received was for the Cowan Heights Neighbourhod Plan. At this early stage, there might be indication that specific properties could be rezoned but this has only been adopted in principle and would need Provincial review. This broader plan will be considered sometime in the fall.*

This speaker said it was easy to be confused as the proposed apartment buildings also are on Blackmarsh Road. They wanted clarification if this rezoning would impact their parent's home.

> *Ms. Cashin responded: She reiterated the current hearing was only for 746 Blackmarsh Road.*

This speaker also stated they had worked with individuals living on low income, highlighting this circumstance does not mean they are all involved in crime. However, they also see the other side of low income housing, referencing that some of the residents' concerns are therefore valid.

Speaker #4: Speaker #4 wondered if the proposed apartment building could be 50+ development and/or condos. They felt these options would reduce the density, and there would be more control of the property. However, this speaker also recognized this would impact affordability.

Additionally, this speaker described Blackmarsh Road not as a "super highway" but as a "two-lane country road at best".

Speaker #5: Speaker #5 was seeking clarification on the number of units to be designated 50+, as they were confused when someone said 'mixed use' housing.

> *Response from Mr. Adam Tucker: All units are designated for seniors but 20 would be designated affordable and 25 would be market rent.*

This speaker also referenced cars speeding on Blackmarsh Road, and they asked for clarification on the site plan.

> *Ms. Cashin responded: The site plan shows three buildings with 15 units each. Further, she clarified that once a property is rezoned, any uses within the zone can*

be considered. An A1 Zone does allow for apartment buildings but also, for example, a town house cluster; other forms of housing; office and daycare.

Speaker #6: Speaker #6 expressed some concerns with the rezoning, including the precedent it would set in terms of development. It would devalue the need for family homes in the area; and not contribute to increasing the number of children in the area, which could impact sustainability of local school infrastructure. They felt the Cluster Development was not family-centered infrastructure. This speaker said they were not opposed to the development, but they would have preferred something other than apartment buildings, which they described as "taking Cowan Heights to a new level".

Speaker #7: Speaker #7 referenced they are thinking about downsizing and interested in the development. Their understanding is this is a 50+ development, with accessibility considered, and only some apartments will be subsidized.

Speaker #8: Speaker #8 said they understood that the primary focus of the hearing was the target property, but they were interested in the status, outlook, plans and processes for the larger area to the northwest.

Ms. Cashin responded: She clarified that the area being referenced by the speaker had originally been part of a Kenmount Concept plan, but this was not finalized or adopted by Council..

Speaker #9: Speaker #9 asked if additional properties were being planned, moving east to the roundabout area, and if the current development was part of the plan to intensify and develop the larger area?

Ms. Cashin responded: She reiterated the hearing was focused only on the one parcel of land and that the broader plan was different.

This speaker also questioned whether the targeted tenant population (50+) would remain the same if the properties were sold.

Ms. Cashin responded: She explained that while the City regulates the type of building, they do not regulate the target population, and the nature of the residents could change depending on the owner.

Speaker #10: Speaker #10 referenced property belonging to a family member living on Blackmarsh Road, noting they had challenges arising from previous development. They also stated that this is the first they heard of broader plans to develop the 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, and a greater mix of uses through investment in infrastructure that supports higher density development along major transportation corridors and centres where there are opportunities for redevelopment;

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 St. John's 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. At the same time, there are concerns about how such development could be achieved and how it might affect established residential neighbourhoods.
>
> Many of the City's neighbourhoods, with the exception of the downtown area, are traditionally low density, with consistent building size, height and lot size. 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. […]
>
> Sustainable communities have a range of housing choice so that people of all ages, abilities and incomes can find quality, affordable shelter. While the range of

> housing choices is expanding, further steps are required to address issues of affordability. […]
>
> Increasing the supply of affordable housing over the planning period is an important goal for the City. Policies have been developed to require new residential and mixed-use developments to include a variety of housing forms that are affordable to people with a range of incomes.

Further, as detailed under the 'Urban Design' theme:

> The ability to achieve intensification and redevelopment that encompasses a mix of land uses within the built-up areas of the city requires high quality urban design.
>
> […] Care will be taken with the design of new buildings to provide appropriate buffers and design solutions to minimize the impact on adjoining established residential neighbourhoods.

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.

Further Section 4.1 speaks to the essential nature of affordable housing and the City's role in increasing the supply of, and access to, such housing:

> Access to adequate and affordable housing is a fundamental component of quality of life in a city. Many factors impact access to housing including price, supply location and access. The housing market and various levels of government play a role in influencing what housing choice exists for people with varying needs and income levels.

> The City, along with not-for-profit housing partners and other levels of government, is working to increase the supply of and access to affordable housing. Through this Plan and its implementation, the City will work to produce, protect and promote affordable housing by providing a choice in housing forms, tenures and affordability, to accommodate the needs of current and future residents.
>
> 1. Support the implementation of the City of St. John's Affordable Housing Strategy, 2019 - 2028, and its strategies.
>
> 2. Enable a range of housing to create diverse neighbourhoods that include a mix of housing forms and tenures, including single, semi-detached, townhousing, medium and higher density and mixed-use residential developments.
>
> 3. Promote a broad range of housing choice for all ages, income groups, and family types by supporting the development of housing that is appropriate, accessible and affordable for low-income and moderate-income households.

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.

Section 4.4 Good Neighbours: Reducing Land-Use Conflict

Section 4.4 addresses reducing land use conflict, which can arise, for example, when a proposed development like an apartment building, is out of scale or character with the form of existing buildings such as single detached dwellings.

> Conflict often arises where a land use or building is proposed next to a residential or open space use, or where a building is proposed that is considered out of scale or character with the form of adjacent buildings. Many different uses and building

forms can co-exist, provided proper consideration is given to site and building design, and measures to reduce or eliminate potential land-use conflicts.

Policy 4.4.1: Ensure that the review of development proposals considers how new development may affect abutting properties and uses.

5.1.3 Chapter 6 - Urban Design

Within the discussion of Urban Design, it is noted that:

> Good urban design is […] about place-making, incorporating environmental stewardship, social equity and economic viability into the creation of places with distinct beauty and identity.

5.1.4 Chapter 7 – Transportation and Infrastructure

Section 7.5 Water and Wastewater Servicing

This section overviews the need to ensure 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).

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. As the name implies, this District speaks to lands identified for future urban expansion. Further, it is cited:

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

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. […]
>
> Neighbourhoods experience a variety of changes over time, and these transitions, create well-defined neighbourhoods and a varied housing stock. The challenge is to ensure the stability of developed neighbourhoods while recognizing that neighbourhoods evolve to reflect changes in the local population. Accommodating change within neighbourhoods as they evolve requires detailed planning and collaboration with residents at the local level.
>
> The City's goal is to ensure that residential neighbourhoods are inclusive and support people of differing ages, abilities and socio-economic groups. This requires a variety of housing options, public amenities and transportation infrastructure, capable of change as neighbourhoods mature.

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 8.4.6 - Apartment Zones shall be permitted within the Residential District outside of Planning Area 1. Their location should be compatible with surrounding uses, ensuring that overall size and scale is sensitive to the surrounding residential neighbourhood.
>
> Policy 8.4.9 - Encourage increased density in residential areas where appropriate […].

5.1.5.2 Redesignation of the Subject Property

To accommodate the potential residential development on the identified parcel of land at 746 Blackmarsh Road, a zoning change is required as detailed earlier. Rezoning the subject property would require a redesignation from the Urban Expansion 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 Rezonings 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; […]
>
> Compatibility of the development in terms of height, scale, lot coverage and bulk with adjacent properties; […]
>
> Whether the proposal is in conformity with the intent of this Plan, any applicable Secondary Plan, and with the requirements of other City by-laws and regulations; . […]

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 'the City may require an LUR to be prepared to determine the significance of the impacts and include recommendations on measures to control and mitigate the identified impacts where appropriate.'

Further as per policies in this section, it is noted that:

> Council shall prepare and approve Terms of Reference setting out the matters that require assessment in an LUR. […]
>
> The City shall provide adequate time for public review of an LUR prior to its consideration for approval.

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

The subject area is within the Urban Development designation of the Regional Plan which states, 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.' As such, the proposed amendments align with the Urban Development policies and the intent of the Regional Plan 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 property at 746 Blackmarsh Road is within the Rural Residential (RR) Zone. This Zone does not accommodate apartment buildings.

To accommodate the proposed use of Apartment Buildings for a Cluster Development, it is proposed the site be rezoned to Apartment 1(A1).

5.3.2 Zoning considerations

5.3.2.1 Cluster Development

The Apartment 1 (A1) Zone includes 'Cluster Development' as a permitted use. This use is defined in Section 2 - Definitions of the St. John's Development Regulations as:

> **CLUSTER DEVELOPMENT** means two or more Buildings, each of which is comprised of a Townhouse Cluster, Triplex, Four-Plex, or Apartment Building, or any combination thereof, on one Lot, as a condominium or common ownership. **(2024-07-19)**

Of note, Cluster Development is one of a series of text amendments designed to support the City's goal of promoting densification and improving internal processes and policies that accelerate the development of diverse housing types throughout St. John's.

In terms of specific Zone standards for a Cluster Development in the Apartment (A1) Zone, these include a minimum for Rear and Side Yards, which the proposed developed exceeds.

As well, there is a requirement of a minimum of 35% landscaping, including greenspace, which has been met by the proposed development. As detailed in the December 2025 Amendment Package, the applicant proposes to retain existing trees at the rear of the lot, and the applicant's LUR cites that they intend to remove only those trees which interfere with the final site layout.

The maximum Building Height for a Cluster Development in the Apartment (A1) Zone is 14m, and the proposed apartment buildings for 746 Blackmarsh Road will be 12m in height.

5.3.2.2 Traffic

Information responding to traffic concerns was provided by the City's Transportation Division and detailed by Ms. Cashin at the May 6, 2026, Public Hearing as follows:

- The City has counted and reviewed traffic volumes at the Canada Drive/Blackmarsh Road intersection to confirm that a traffic signal is not warranted. The City will continue to monitor traffic volumes in the area as travel patterns adjust with the completion of the Team Gushue Highway.
- Blackmarsh Road is an arterial street and therefore is not eligible for traffic calming as per the City's Traffic Calming Policy and Procedures.
- Access to the development site will be aligned with the existing intersection of Canada Drive and Blackmarsh Road to mitigate conflicts with existing turning movements. The applicant has been advised that the addition of a crosswalk at the intersection will be required. The detailed design of the intersection will be completed at part of future development application phases.

5.3.3 Section 4 General Development Procedures

Section 4.1 overviews control of development.

> 4.1.1 Compliance
>
> All Development shall be carried out and maintained in accordance with the Act, the Municipal Plan, these Regulations and any policy adopted thereunder.

Section 4.4.1 overviews what a submitted application should include:

> 4.4.1 Submission
>
> […]
>
> (2) An application shall include such plans, specifications and drawings as necessary to evaluate the application, together with the applicable fee.

This subsection identifies what an application for Development (with buildings) shall include. Most relevant to the 746 Blackmarsh Road application are, for example, inclusion of a site plan, vehicular access, pedestrian access, cycling and transit as well as storm water management plan and snow storage plan.

Land Use Reports

Subsection 4.9.2 identifies that:

Council shall require and approve a Land Use Report as part of the Development application review process for applications related to or involving: (2022-05-27)

(a) all applications for an amendment to the Municipal Plan or Development Regulations;

Further, 4.9.5 and 4.9.6 outline the following:

(5) The terms of reference for a Land Use Report shall be approved by Council and shall form part of the report itself.

(6) The Land Use Report shall address at a minimum, Development use, public consultation, elevations, materials, height, location, environmental impacts, infrastructure, transit, and compatibility with the Municipal Plan, and shall require identification of significant impacts of the proposed Development, evaluate their importance and, where appropriate, contain a Mitigation Plan and a Conservation Plan.

5.3.4 Section 6 Specific Developments

This section cites provisions which are supplemental to those provisions set out in Section 10 for all Use Zones. Subsection 6.1 further states that the provisions noted under Section 6 take precedence over those noted in Section 10 in instances where there is a conflict therein.

Subsection 6.9 identifies the following in relation to Cluster Developments:

6.9 CLUSTER DEVELOPMENT

(1) A Cluster Development shall contain no more than one (1) Driveway, but may require a secondary access as determined by a City engineer or the St. John's Regional Fire Department.

(2) All parking as required under Section 8.3 shall be provided on a Parking Lot.

(3) A Cluster Development with 20 or more Dwelling Units shall, in addition to minimum landscape requirements, include a minimum of 6 metres square per Dwelling Unit of useable green space for the benefit of the Cluster Development. Green space area is to be contained entirely within the Lot boundaries, continuous on the Lot, covered with Soft Landscaping and subject to the said area being acceptable to the City.

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 contemplates a range of housing options to create diverse neighbourhoods. Introduction of Apartment Buildings via a Cluster Development continues the residential nature while adding to the diversity of housing types in the area of the subject property.

In particular, the Plan speaks to the critical nature of increasing the supply of affordable housing so that people of all ages, abilities and incomes can have choice in this regard.

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.

Residential Land Use District

The proposed development meets 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 while being economically viable for a range of socio-economic groups; and maximizing use of existing infrastructure.

Cowan Heights Neighbourhood Plan

As detailed in the December 2025 Amendment Package:

> The Cowan Heights Neighbourhood Plan, while only in draft form at present, contemplates this area of Blackmarsh Road as being high-density, including

> apartment building forms, with pedestrian improvements and increase[d] connectivity to existing recreational amenities.

Redesignation

The proposed rezoning of the parcel of land at 746 Blackmarsh Road is consistent with the vision, intent and direction of the St. John's Municipal Plan – supporting opportunities for increased density 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 to the Residential Land Use District is appropriate.

6.1.1 Mitigation of Impacts in Relation to the Amendments or Issues Raised

The Envision St. John's Municipal Plan identifies a role for the City in ensuring that impacts associated with particular zones are compatible with policies adopted under the Plan. The challenge for the developer and the City, in relation to the proposal for 746 Blackmarsh Road, is to ensure that all due care and attention are paid to mitigating impacts of the development on the existing neighbouring residential areas.

The issues of concern raised by those who attended the Public Hearing, as well as in the submissions received, were fairly consistent and, in summary, related to the following:

Compatibility with existing land uses

Redesignating and rezoning the subject property to Residential Land Use District and Apartment (A1), respectively, would enable residential use in keeping with the existing properties along Blackmarsh Road and in adjacent Cowan Heights. While the proposed development is of a moderately higher density, it does not change the primary use from a residential one.

While this development will introduce a new housing form to the area, as detailed in the December 2025, Amendment Package, it "will create a more diverse neighbourhood for new residents or existing residents looking to downsize and remain within the neighbourhood".

Loss of greenspace and tree cover

As detailed earlier in this report, a portion of the subject property was previously cleared between 2015 and 2017, although no development subsequently occurred. As per the requirements for a Cluster Development, more greenspace (35%) is required, and information provided in the December 2025 Amendment Package and the applicant's

LUR evidences that the proposed development meets the City's landscape requirements. Further, it was detailed that the applicant proposes to retain existing trees at the rear of the lot, and the applicant's LUR cites that they intend to remove only those trees which interfere with the final site layout.

Traffic

A few submissions and speakers at the Public Hearing referenced traffic concerns including speeding and that the proposed development would be across from the Blackmarsh Road/Canada Drive intersection, resulting in another access point and increased car and foot traffic on a road network not designed to accommodate such an increase.

As described earlier, the City's Transportation Division has identified that this development and associated traffic flow would not warrant a traffic signal, but additional monitoring of traffic volume will be needed in light of the completion of the Team Gushue Highway.

Further, access to the development site will be aligned with the existing intersection of Canada Drive and Blackmarsh Road to mitigate conflicts with existing turning movements. The applicant has been advised that the addition of a crosswalk at the intersection will be required. More specifically, as detailed in the December 2025 Amendment Package:

> Should the development proceed, the applicant will be required to provide an accessible path of travel from the access intersection/public right of way to building entrances and exits. Further, the City recommends improvements to pedestrian connections and crossing on Blackmarsh Road as part of ongoing capital works projects.

Building Height/Loss of privacy

It is important to state that there are many areas of the city where development is possible adjacent to existing residential developments. When residences are built and occupied, there is no guarantee that future development will not occur nearby.

As per Municipal Plan policies, Council must attend to height and scale of proposed developments. The development under consideration is noted to include buildings which at a maximum would be 12m in height, less than permitted in a Cluster Development.

Further, and as detailed in the December 2025 Amendment Package, this is a similar height to existing dwellings in the area and will blend with the existing housing form.

Affordable housing

A critical consideration in relation to the proposed amendments is the ever-increasing demand for affordable, accessible and suitable housing across the Region, the province and the country. Unfortunately, the term 'affordable' often elicits a 'not in my backyard syndrome' response as current residents fear that the development will not be in keeping with the neighbourhood (e.g., property values, 'type of people and families', property upkeep). This is an all-too-familiar issue which arises in many cases where a higher density residential development is proposed.

Municipal Councils do not regulate who is allowed to live in a development, nor do they regulate behaviour. Having said that, there is no evidence to imply that affordable housing brings the anticipated negative effects to a neighbourhood.

It is important to state that availing of federal funding to enable housing development does not in any way diminish the power Council has to fairly and rigorously assess development applications.

7.0 Recommendations

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

Acceptance of the Envision St. John's Municipal Plan *Amendment Number 22, 2026*

> Redesignating land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Urban Expansion Land Use District to the Residential Land Use District

Acceptance of the Envision St. John's Development Regulations *Amendment Number 72, 2026*

> Rezoning land at the front of 746 Blackmarsh Road [Parcel ID#44306] from the Residential Rural (RR) Zone to the Apartment 1 (A1) Zone

RESPECTFULLY SUBMITTED THIS 25TH DAY OF MAY 2026



Marie. E Ryan,
Commissioner

Appendix A
Terms of Reference – Land Use Report (LUR)

TERMS OF REFERENCE
LAND USE REPORT (LUR)
APPLICATION FOR CLUSTER DEVELOPMENT AT
746 BLACKMARSH ROAD
NOVEMBER 27, 2024

The proponent shall identify significant impacts and, where appropriate, also identify measures to mitigate impacts on land uses adjoining the subject property. All information is to be submitted under one report in a form that can be reproduced for public information and review. The numbering and ordering scheme used in the report shall correspond with that used in this Terms of Reference and a copy of the Terms of Reference shall be included as part of the report (include an electronic PDF version with a maximum file size of 15MB). A list of those persons/agencies who prepared the Land Use Report shall be provided as part of the report. The following items shall be addressed by the proponent at its expense:

A. Public Consultation

- Prior to submitting a first draft of the Land Use Report to the City for review, the applicant must consult with neighbouring property owners. The Land Use Report must include a section which discusses feedback and/or concerns from the neighbourhood and how the proposal addresses the concerns.
- Should the site plan change following this consultation, additional neighbourhood consultation may be required.

B. Building Use

- Identify the size of the proposed building by Gross Floor Area and identify all proposed uses/occupancies within the building by their respective Gross and (if applicable for parking calculations) Net Floor Area.
- For Cluster Development, indicate the number of bedrooms in each unit (micro, studio, 1-bedroom, etc.).
    - o If Micro Units are proposed (unit with floor area less than 42m2), indicate the floor area of each unit.
- If there are any proposed commercial uses within the Apartment Building o on the property, indicate the days and hours of operation of each proposed use, number of employees on site at one time, and a description of theactivities in the space (if applicable).

C. Site Location and Lot Layout

- Identify graphically the exact location with a dimensioned civil site plan:

  - o Lot area, lot coverage and frontage;
  - o Location of the proposed building in relation to neighbouring buildings;
  - o Proximity of the building to property lines and identify setbacks;
  - o Illustrate any building stepback of higher storeys from lower storeys or building overhangs (if applicable);
  - o Identify any encroachment over property lines (if applicable);
  - o Identify building entrances and if applicable, door swing over pedestrian connections;
  - o Information on the proposed construction of patios/balconies (if applicable); and
  - o Identify any rooftop structures.
- Provide a Legal Survey of the property.
- Identify any existing or proposed easements.
- Provide streetscape views/renderings of the proposed buildings from Blackmarsh Road.

D. Elevation and Building Height

- Provide elevations of the proposed buildings.
- Identify the height of the building in metres, as per the definition of Building Height from the Development Regulations.

E. Exterior Equipment and Lighting

- Identify the location and type of exterior lighting to be utilized. Identify possible impacts on adjoining properties and measures to be instituted to minimize these impacts.
- Identify the location and type of any exterior HVAC equipment to be used to service the proposed building and identify possible impacts on adjoining properties and measures to be instituted to minimize these impacts.

F. Municipal Services Provide a preliminary site servicing plan.

- Identify points of connection to the City's sanitary sewer, storm sewer and water system. The location of all existing sewers must be shown along with any existing or proposed easements.
- Provide the sanitary and storm drainage area plan along with the sewer generation rate for each.
- The proposed development will be required to comply with the City's Stormwater Detention Policy. Stormwater detention will be required for this development. Provide information on how onsite stormwater detention will be managed.
- Identify if the buildings will be sprinklered or not. Indicate the location of all existing and proposed hydrants and the location of siamese connections (if sprinklered).

G. Landscaping, Buffering & Snow Clearing/Snow Storage

- Identify with a landscaping plan, details of site landscaping (hard and soft) that illustrates:
    - o Proposed placement of trees or other plant material;
    - o Show areas of hard and soft landscaping;
    - o A calculation of the total landscaped area;
    - o Proposed snow storage;
    - o Buffering and screening.
- Indicate through a tree plan/inventory which trees will be preserved.
- Indicate the required resident green space for the Cluster Development.
- Show required parking lot buffering/screening as per Section 8.8 of the Development Regulations on the site plan.
- Identify the location and proposed methods of screening of any electrical transformers and refuse containers to be used at the site.
- Provide information on any snow clearing/snow removal operations. Onsite snow storage areas must be indicated.

H. Transportation. Off-Street Parking and Site Access

- Provide a dimensioned parking plan, including circulation details and parking lot buffers.
    - o Provide design vehicle turning movements for garbage truck and firetrucks demonstrating feasibility of site circulation. Design vehicle profiles must be shown for each design vehicle.
- Identify the number, location, and dimensions in metres of off-street parking spaces to be provided, including accessible parking spaces.
    - o Where an applicant wishes to provide a different number of parking spaces then required in the Development Regulations, a Parking Report isrequired as per Section 8.12 of the Development Regulations.
    - o If parking relief is being requested, then a detailed rationale, as acceptable by staff, must be included. Additional information may be requested upon

review of the parking proposal.

- Identify the number and location of bicycle parking to be provided.
- Identify the location and width of all access and egress points, and aisle widths, including pedestrian access.
- Indicate how garbage will be handled onsite. The location of any exterior bins must be indicated and access to the bins must be demonstrated. Outside waste containers shall be located a minimum of 7.6 meters from structures.
- Include the required left-turn lanes and crosswalk on the civil site plan.

I. Public Transit

- Consult with St. John’s Metrobus (St. John’s Transportation Commission)regarding public transit infrastructure requirements.
- Identify nearby transit stops and routes.

J. Construction Timeframe

- Indicate any phasing of the project and approximate timelines for beginningand completion of each phase or overall project.
- Indicate on a site plan any designated areas for equipment and materialsduring the construction period.

Appendix B
Written Submissions

Theresa K. Walsh

From: [redacted]
Sent: Saturday, April 11, 2026 7:34 PM
To: CityClerk
Subject: 746 Blackmarsh Road

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

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,
My name is [redacted]. For the record I am strongly against this rezoning/development which [redacted]

Thank You
[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Friday, April 17, 2026 9:21 AM
To: CityClerk
Subject: Re: 746 Blackmarsh Road

You don't often get email from [redacted] 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.

To the office of the City Clerk,

My name is [redacted]. I am **strongly** opposed to the rezoning of 746 Blackmarsh road from Rural Residential (RR) zone to Apartment 1 (A1) Zone for a Cluster Development of apartment buildings.

This proposed project is not something we want to see [redacted]. We have worked hard to be able to provide [redacted] a safe, clean area and purposefully wanted to live here as the location and the surrounding residential homes are well taken care of and away from the NL housing units. I know it is a stigma to say that with low income housing comes more crime or "rougher" areas / trap houses, but it is so true for the areas that do have this type of housing in St. John's currently. I do not want to see our lovely area take a turn down. There is already an increase in crime in the area, lets not add to the problem. I do understand that not all low income individuals that reside in housing units are "trouble" but the sad fact is that the bad far exceed the good. The current areas in the City that are low income area, are not cared for by its residents, and look run down and have the look of a rougher area that we want to avoid. We chose this area because it is all residential houses, NOT apartment buildings.

I understand the need for the low income housing, but there are other areas in the city that are currently zoned for A1 development that can be utilized for this purpose. I look forward to the meeting on May 7th.

Thank you so much for your time.

A concerned resident,

[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Friday, April 17, 2026 9:40 AM
To: CityClerk
Subject: CONCERNS regarding 746 Blackmarsh Road from Rural Residential (RR) zone to Apartment 1 (A1)

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.

To the Office of the City Clerk,

My name is [redacted]. I am strongly opposed to the rezoning of 746 Blackmarsh Road from Rural Residential (RR) zone to Apartment 1 (A1) zone for a cluster development of apartment buildings. This proposed development would be located [redacted] which is very concerning for our family and neighbours.

This proposed project is NOT something we want to see so close to our home. [redacted] we truly love the community the smaller school class sizes that come along with the community.

We understand there can be sensitivities around discussing housing types, but we do have concerns based on what we've seen in other areas of St. John's. In some cases, higher-density or low-income housing developments have been associated with increased crime and properties that are not as well maintained. While we recognize that not all individuals in these developments contribute to these issues, the overall impact in certain areas has been noticeable.

We chose this neighborhood specifically because it consists of residential homes, not apartment buildings. We are concerned that this development could change the character of the area and contribute to challenges that are already beginning to emerge, including increased crime.

We do understand the need for additional housing in the city, including affordable housing. However, we believe this type of development would be better suited in an area that is closer to shops, restaurants, and other amenities, where residents would have easier access to services and transportation. There are also other areas already zoned for A1 development that would be more appropriate for this type of project.

Thank you,
[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Friday, April 17, 2026 9:54 AM
To: CityClerk
Subject: 746 Blackmarsh Road

You don't often get email from [redacted] 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.

To the office of the City Clerk,

My name is [redacted]. I am very **strongly**opposed to the rezoning of 746 Blackmarsh road from Rural Residential (RR) zone to Apartment 1 (A1) Zone for a Cluster Development of apartment buildings.

[redacted], this proposed project is not something I want to see so close to my home. [redacted] we love this area. I still know most of the long time residents in the area and really enjoy the safe, clean, and familiar neighbourhood.

We chose to stay in this area because it is all residential houses, **NOT** apartment buildings. We chose to live here as the location is away from the NL housing units. I understand the need for the low income housing, but there are other areas in the city that are currently zoned for A1 development that can be utilized for this purpose, [redacted]

Thank you so much for your time.

[redacted]

[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Monday, April 20, 2026 1:50 PM
To: CityClerk
Subject: 746 Blackmarsh Road

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.

Subject: Opposition to Proposed Rezoning Amendment (Rural Residential to Apartment Zone) – 746 Blackmarsh Road

Dear Mayor Breen and Members of City Council,

I'm writing as a resident [redacted] 746 Blackmarsh Road to respectfully oppose the proposed amendment to rezone the subject property from Rural Residential to the Apartment Zone.

While I understand the need to plan for growth and housing, this change is not appropriate for this location and would create significant impacts for nearby residents, including my family, for the following reasons:

1) Property value and neighborhood character

Rezoning from Rural Residential to an Apartment Zone would fundamentally change the established character of our area. A transition to higher-density development can negatively affect nearby property values by increasing congestion, noise, and parking spillover, and by eliminating the rural-residential setting that current homeowners reasonably relied upon when purchasing their properties.

2) Environmental impacts

This area currently functions as a lower-density buffer with open space and permeable ground. Higher-density apartment development would likely increase stormwater runoff, strain drainage infrastructure, reduce green space/tree cover, and disrupt local habitat. Once these impacts occur, they are difficult to reverse. [redacted] there is potential for significant water flow during heavy rain events and during heavy snowmelt. Higher-density development typically increases hard surfaces (roofs, driveways, parking areas), which can substantially increase runoff volume and speed. In a hillside area, this raises real concerns about drainage capacity, localized flooding, ice formation in winter, and potential impacts to neighbouring properties. Before any rezoning is considered, Council should require clear evidence—through appropriate stormwater and servicing analysis—that the existing and planned infrastructure can safely manage intensified runoff in all seasons. I ask Council to require a thorough environmental review addressing stormwater, flooding risk, tree loss, heat island effects, and any impacts to nearby waterways/ditches/wetlands (if applicable) before considering any zoning change.

3) Safety concerns from increased traffic and activity

My family's day-to-day safety is a major concern. Apartment zoning would predictably increase both vehicle trips and foot traffic in an area not designed for that level of intensity. More vehicles entering/exiting, more on-street parking demand, and more pedestrian activity—especially during early morning and late evening hours—creates additional risk for children, walkers, cyclists, and families who currently rely on quieter local roads. The proposed area has no sidewalks. Changing the zoning to permit apartment development would predictably increase both vehicle trips and foot traffic, yet the road network is not designed to safely accommodate pedestrians. This creates added risk for families, children, seniors, and anyone walking along the roadway—especially during dark winter mornings/evenings and poor weather conditions that are common in St. John's. Increased on-street parking and higher traffic volumes would also reduce sightlines and worsen safety on an already constrained street. If this amendment moves forward, the City should first demonstrate how it will mitigate traffic speeds, sightlines, pedestrian crossings/sidewalk gaps, lighting, and emergency access.

4) Better-suited locations exist

It would be more responsible to prioritize rezoning in parts of the city that are already better served by appropriate infrastructure and are planned for higher density—such as areas nearer major corridors, existing commercial centers, transit routes, and locations with sidewalks, lighting, and road capacity designed for more residents. There are areas within the city that are more "rezoning-ready" without imposing disproportionate impacts on a rural-residential neighborhood. Rezoning should be directed to places that are truly "ready" for apartments, rather than introducing higher-density development into a rural-residential area lacking basic pedestrian and drainage infrastructure.

For these reasons, I respectfully request that Council vote "**no**" on the proposed rezoning amendment.

At minimum, I ask that Council defer any decision until it has:

- a detailed stormwater/drainage assessment addressing heavy rainfall and snowmelt conditions on sloped terrain;
- a traffic and pedestrian safety review that specifically addresses the absence of sidewalks, lighting, sightlines, and winter conditions; and
- a clear rationale explaining why this location is being prioritized over other areas that are more appropriate and infrastructure-ready for apartment zoning.

If Council believes additional housing capacity is needed, I urge you to consider alternative sites and planning approaches that align density with infrastructure, safety, and environmental protections.

Thank you for your time. Please include this email in the council agenda for the hearing on May 6, 2026. I would appreciate confirmation that my comments have been received.

Sincerely,

[redacted]

[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Thursday, April 23, 2026 10:50 AM
To: CityClerk
Subject: Blackmarsh Road Rezoning

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Hello,

I would like to put on record, my ongoing concerns re: the development of one of the last remaining large green spaces within reach of those living on Mt Carson, Blackmarsh and Old Pennywell Roads. This area has long been used for walking and its use as a recreation area has only increased since Covid and the access Team Gushue highway at Redmond's Road, now gives motorists.

I am not opposed to more affordable housing but I am opposed to development without clear communication to the public -- especially when it comes to the seeming lack of any long term plan regarding this green space. This area straddles the boundaries of Mount Pearl and St. John's. Both municipalities have been or plan on developing areas around its borders. In fact the entire summit of Mount Carson/Kenmount Hill, was up for sale just a few years ago. Maybe it still is or maybe it's already been bought up. Both municipalities, but particularly St. John's because more of this land lies on their side, has been selling off the land piece by piece to developers. This new rezoning application for Blackmarsh Road seems to be part of that trend.

Without a clear sense of where all this development is going, people are concerned about the continued loss, seemingly through attrition, of these green spaces. Over time there has been an increase in this loss leading to fewer green recreational areas available within walking distance or a short drive from home. The loss of the entirety of this green space, a space which has many well used recreational walking trails throughout, would be a real loss. Both now and in the future.

Maybe, if the municipalities could cooperate on a plan that would see a largish portion of this land left as a recreational green space, I would not be so concerned. Or, quite frankly, frustrated.

[redacted] I have expressed my concerns in writing and at public meetings to the City of Mount Pearl, about this development. And I have watched as more and more of the trees and green spaces in this area are felled in favour of development that seems to lack enough thought about the future health and well being of those living in the area now and those who will live in the area after development. Will all residents evetually have to access a car or bus route (and that's another issue) in order to get to a tree filled green space?

During the lockdowns of Covid, many health professionals advised people to get out into green spaces as a way of reducing anxiety and improving mental health. So, why does the entirety of this green space have to be torn apart and cleared for developers? Why can't the two municipalities agree, at the very least, on a green corridor?

The provincial government has often issued statements about the need for residents of this province to look after their physical and mental health. In light of that advice, please consider saving a portion of this green space for the recreational use of residents.

There is an existing and wide path that moves through this area straight to Old Pennywell Road. It runs parallel to Kenmount Road and what an amazing walking and biking trail that would make for the people of both Mount Pearl and St. John's! It would also provide a transportation alternative for those who bike and move between St. John's and Mt Pearl. And if this green corridor could also connect with the trail that runs along the Waterford River, it would give so many residents access to a beautiful and calming, tree lined, space.

A plan like that may go a long way to ease the minds of residents like me, that are so very concerned as they watch the ever increasing loss of surrounding green spaces.
Thank you for your consideration,

[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Sunday, April 26, 2026 2:27 PM
To: CityClerk
Subject: Public Hearing - May 6, 2026

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Attention: Project Team - Rezoning Top of Canada Drive

We are residents [redacted], to learn of the rezoning plans for the top of Canada Drive.

[redacted] have enjoyed the quiet area of residential single or homes with basement apartments since that time. We are concerned about the changes these new affordable housing buildings will bring to our area. Will it affect our property values? Will it increase traffic down Canada Drive for access to Topsail Road? We have already experienced concerns with traffic speed coming down Canada Drive especially as there is a blind spot making the turn on the hill. We are also concerned about an increase in rodents into this area once clearing the land begins. I am sure there are others but these are the main concerns that come to mind right now.

Changes to the area are to be expected, however, I hope we can be assured that we and others living here will be minimally impacted.

Thanks

[redacted]

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Theresa K. Walsh

From: [redacted]
Sent: Sunday, April 26, 2026 6:02 PM
To: CityClerk

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Attention: St John's Municipal Counsel

Regarding: 746 Blackmarsh Road Development

I am writing as a written objection to the proposal of the land located at 746 Blackmarsh Road to be realigned from the Rural Residential (RR) zone to the Apartment 1(A1) cluster development zone.

1. A change to apartment cluster will impact future investors who may desire to explore and develop a rural subdivision. There is a huge land development opportunity that exists between Blackmarsh Road and George's Pond leading to Mount Pearl. However, this one apartment building structure could negatively impact a future developer's desire to build a rural subdivision around it. By allowing an apartment cluster zonal development, this will detract future rural developers' interest in residential development due to an apartment at its center.
2. Residential rural developments have higher financial benefits via land and water taxes for the city than an apartment cluster. As a current residential taxpayer, our taxes have become so high that we, like others have considered moving to a town outside the City of St. John's where residential taxes are more affordable. As a taxpayer I would welcome increased residential homeowners to help stagnate any further tax increase. An apartment cluster development benefits residential owners in no way as the renters are not paying taxes to the City of St. John's rather only the building owner for one property.
3. Rural residential development is about creating communities. In St. Johns' a lack of family-built structures/ homes is as well a crisis with an estimated all-time 20-year shortage of home construction. Increased migration to St Johns has caused bidding wars where prospective homeowners are forced to either pay 4 to 5 digits over. i.e. sometimes over $100,000 of original asking price, or they are unable to purchase a home at all. This has led to prospective residential owners choosing rather another Municipality bordering on the City of St. John's to reside where that Municipality is reaping the financial benefits of increased taxpayers. There is a reason why The Town of CBS is the fastest growing in NL.
4. This proposed land development of an Apartment 1A cluster is not an investment in financial opportunity. It is a representation by the City of St. John's of its continued focus

on structure development that is making St. John's more a place to rent, rather than prioritizing residential family homes to be a City to grow community.

5. Without the City focusing on Rural Residential development, we are slowly becoming a place to rent; a place to build apartment cluster structures. Without increased rural residential development prioritization we will continue to lose families to the neighboring municipalities while those same individuals will utilize our roads and services to commute back and forth for work.
6. Cowan Heights and Waterford Valley have the location of several schools from grades K-12 of which we wish to maintain their existence. A Rural Residential zonal development is what will entice families with children to live in this Ward district of St. John's, and not residents of an apartment complex as most to all those 45 units will be.... adults with no school aged children. I am not growing this community, nor any city counsellor, but what grows community is development to entice the growth of families.....the children is what we need to grow this community and maintain the infrastructure in this ward.

I hope you do reconsider the decision to realign 746 Blackmarsh Road from the Rural Residential (RR) zone to the Apartment 1(A1) cluster development zone, and choose to keep it as it currently exists.

[redacted]

Theresa K. Walsh

From: Greg Noseworthy
Sent: Sunday, April 26, 2026 7:51 PM
To: CityClerk
Cc: Theresa K. Walsh
Subject: Fw: Blackmarsh Road Development - [redacted]

Hey Theresa,

Can we have this added to the records for the Council package for 746 Blackmarsh? I've since confirmed with [redacted] he'd like this included!

Thanks so much,
G

Greg Noseworthy
Ward 3 Councillor
709-576-8643
Facebook.com/NoseworthyGreg
Instagram: TeamNoseworthy

From: [redacted]
Sent: Sunday, April 26, 2026 7:35 PM
To: Greg Noseworthy <gnoseworthy@stjohns.ca>
Subject: Blackmarsh Road Development - [redacted]

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Good Day,

I am writing to express my support for the Blackmarsh Road housing development.

[redacted] and while any local concerns regarding traffic and property values may be legitimate they should not outweigh the needs of all NLers who require affordable housing.

Local input for these projects are always predominantly negative, NIMBYism is an unfortunate reality we must stand up to. We are in a terrible housing crunch and we need to build. Our neighbourhoods cannot remain frozen in time at the cost of rising homelessness.

If we listened only to the local input when trying to build we would never get anything done. Projects like energy, transport, and housing which benefit all can never get off the ground because the NIMBY says no.

The traffic here is really not that bad anyway and we have such a great centralized location that's perfect for bus access.

If you need anymore information from me, please let me know.

Thank you,

[redacted]

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Theresa K. Walsh

From: [redacted]
Sent: Sunday, April 26, 2026 9:47 PM
To: CityClerk
Subject: 746 Blackmarsh Rd Development

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I totally support this development.

[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Sunday, April 26, 2026 10:25 PM
To: Greg Noseworthy
Cc: CityClerk
Subject: Feedback on 746 Blackmarsh Road Proposal - Traffic Signal Concern

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Hi Councillor Noseworthy,

I'm writing regarding the proposed apartment development at 746 Blackmarsh Road, opposite Canada Drive.

Overall, I am not opposed to this development. I understand the need for more housing in St. John's, especially housing that helps seniors remain in the community, and I appreciate that the proposal is relatively modest in scale.

My main concern is traffic safety at Blackmarsh Road and Canada Drive.

Blackmarsh Road already has speeding issues, and Canada Drive is a significant access road for the surrounding neighbourhood. There is already a fair amount of traffic turning in and out of Canada Drive, and one ongoing issue along Blackmarsh Road is the lack of dedicated turning lanes. Traffic commonly backs up behind vehicles waiting to turn, especially when drivers are turning left.

Adding a new access point for this development at or near that same intersection could make an already awkward situation worse. Even if the development is not large enough on its own to automatically require traffic lights, I do not think the traffic impact should be evaluated only by looking at the number of units. The existing road conditions, vehicle speeds, turning movements, sightlines, pedestrian safety, and lack of turning lanes should all be considered together.

I would like to see the City require a proper traffic and safety review before final approval, including whether additional infrastructure is needed at this location. That review should consider options such as:

- traffic lights, if warranted by the data;
- dedicated turning lanes or turning pockets on Blackmarsh Road;
- improved signage, pavement markings, or visibility improvements;
- pedestrian safety measures, especially given that this is proposed seniors' housing;
- traffic calming or speed reduction measures along this section of Blackmarsh Road;
- careful design of the development's entrance so it does not create additional conflict with Canada Drive traffic.

I am not saying traffic lights are necessarily the only solution. However, I am concerned that simply saying a development of this size would not normally require lights may overlook the reality of this specific intersection. This is not just a new driveway onto a quiet street. It is being added near a busy neighbourhood access point on a road where speeding and turning delays are already concerns.

I would appreciate it if Council could ask City staff to take a closer look at this intersection specifically and explain what traffic safety measures, if any, would be required as part of the development approval.

Again, I want to be clear that my concern is not with the seniors' housing itself. My concern is making sure the road infrastructure is safe and appropriate for both current residents and future residents of the development.

Thank you for taking the time to hear feedback from the community.

Sincerely,
[redacted]

Theresa K. Walsh

From: [redacted]
Sent: Sunday, May 3, 2026 4:40 PM
To: Greg Noseworthy; CityClerk
Subject: Re: Concerns Regarding the Proposed Rezoning of 746 Blackmarsh Road

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[redacted].

Thank you.

[redacted]

[redacted]

Dear Councillor Noseworthy,

I am writing to formally express my opposition to the proposed rezoning of 746 Blackmarsh Road.

I am a long-time resident [redacted]. As such, any rezoning would have a direct and significant impact on my property, privacy, and quality of life.

While I recognize the importance of housing initiatives, I do not support the introduction of higher-density or affordable housing at this location. Developments of this nature must be carefully sited to ensure land-use compatibility and protection of established neighbourhoods. In my view, the proposed rezoning is incompatible with the surrounding low-density residential area and raises serious concerns that have not been adequately addressed.

1. **Land-Use Compatibility, Density, and Neighbourhood Character**
   The scale, height, and intensity of development permitted by this rezoning-particularly multiple three-storey buildings-are not consistent with homes in the surrounding neighbourhood. Approval would represent a substantial intensification of land use and risks undermining the established character, stability, and zoning intent of the area. It may also establish a problematic precedent for further intensification incompatible with existing residential uses.

2. **Privacy and Loss of Residential Amenity**
   The proposed building height and proximity would create [redacted] resulting in a significant loss of privacy and quiet enjoyment. Residents have a reasonable expectation of privacy in rear yards within low-density residential zones. Without substantial mitigation-such as reduced height, increased setbacks, and enforceable screening measures-the privacy impacts on adjacent properties would be unacceptable.

3. **Traffic, Safety, and Emergency Access**
   Traffic conditions on Blackmarsh Road, particularly near Redmond's Road and the Team Gushue Highway, are already problematic and often hazardous. Vehicles exiting onto the Blackmarsh Road turnoff are often stopped completely on the TGH. Increased residential density will further exacerbate congestion and raise concerns regarding public safety and emergency vehicle access. It is unclear whether a comprehensive traffic impact assessment has been completed or how these issues would be adequately mitigated.

4. **Cumulative Impacts**
   While individual impacts might appear manageable in isolation, the cumulative effect of multiple residential buildings represents a significant intensification of use. Council should consider whether the combined impacts on traffic, noise, privacy, servicing, emergency response, and neighbourhood character exceed what is reasonable or appropriate for this location.

5. **Long-Term Maintenance and Oversight**
   Recent findings by the Auditor General of Newfoundland and Labrador concerning deficiencies in the management, maintenance, and oversight of social housing inventory raise serious concerns regarding long-term sustainability. This has also been an issue for other social or low-income housing developers/landords as well. In the absence of binding, enforceable commitments related to maintenance and oversight, there is insufficient assurance that development enabled by this rezoning will be responsibly maintained over time.

6. **Blasting and Construction Impacts.**

If blasting is required as part of development enabled by this rezoning, there is a real risk of damage to nearby homes and structures. Blasting associated with the construction of the Team Gushue Highway resulted in impacts to many surrounding residences, often without compensation, and remains a significant concern for homeowners in the area.

Given the age of existing homes and the immediate proximity of this site to residential properties, any blasting-related vibration or ground disturbance could negatively affect structural integrity. Rezoning approval without certainty regarding construction methods and mitigation measures exposes nearby residents to unacceptable risk. Should Council consider advancing this application, any approval would need to be strictly conditional upon a comprehensive construction management plan, including independent pre-construction and post-construction property condition surveys, vibration monitoring, advance notice to residents, and clear responsibility for remedial work and compensation should damage occur.

7. **Environmental and Buffering Considerations**

[redacted] provides buffering from Team Gushue Highway traffic and contributes to drainage and green-space functions. Increased site coverage and construction activity may negatively affect stormwater management, vegetation, and soil stability. Council should be satisfied that environmental impacts have been fully assessed and mitigated before any rezoning is considered.

Conclusion

Rezoning is a permanent decision that confers development rights that cannot easily be reversed. Based on the concerns outlined above-particularly incompatibility with the surrounding neighbourhood, excessive density and cumulative impacts, loss of privacy and residential amenity, traffic and safety issues, and uncertainty regarding long-term maintenance-I respectfully submit that approval of this rezoning would be premature and inconsistent with principles of orderly development and protection of the public interest.

For these reasons, I respectfully request that Council refuse the proposed rezoning of 746 Blackmarsh Road.

Respectfully submitted,

[redacted]

[redacted]