



October 13, 2026

Taya Devlin, RPP, MCIP
Manager of Planning
Town of Niagara on the Lake
1593 Four Mile Creek Road
Virgil, ON L0S 1T0

Re: Minor Variance Application at 412 Four Mile Creek Road

Dear Ms. Devlin,

On behalf of Northern Capital Corp., I am pleased to submit the following material as an addendum to our Minor Variance application for the proposed daycare use at 412 Four Mile Creek Road in response to the request of the Town's Committee of Adjustment for additional information at its meeting on August 20, 2026.

Community Needs

We have commissioned NPG Planning Solutions Inc. to undertake additional analyses on community needs for daycare centres in St. Davids, which is one of the key settlement areas for housing growth in the Town of Niagara-on-the-Lake. It was expected that St. Davids will accommodate over 40% of the Town's future residential growth to 2041 (Table 1) and majority of this growth will be single and semi-detached homes, types of housing stock particularly appealing to families.

Table 1 Residential Supply Opportunities by Settlement Areas

Settlement Area	Density Type				
	Single & Semi- Detached	Multiples	Apartments	Total	Percentage
Old Town	187	323	241	751	17%
Virgil	690	32	22	744	17%
Queenston	29	0	0	29	1%
St. Davids	858	113	800	1,771	41%
Glendale	413	649	10	1,072	25%
Rural	2	0	0	2	0%
Total	2,179	1,117	1,073	4,369	100%
Percentage Breakdown	50%	26%	25%	100%	

Source: Technical Background Report (2015), Town of Niagara-on-the-Lake

The Town's latest Official Plan (2026) acknowledges that the introduction of municipal sewage services had resulted in a significant residential development within St. Davids. The growth is also observed through the approval of several subdivisions, including Cannery Park, The Vintages, Tawny Ridge Estates and St. Davids Estates.

We have also looked into the demographic details of St. Davids in the three census Dissemination Areas (35260752, 35260753, and 35260755) of 2021 Canada Census and found that there are 3,635 residents and 1,453 private households. The number of children, including a core daycare-age cohort, is growing significantly between 2016 and 2021 (Table 2), whereas there is only one licensed daycare centre, the Way to Grow Childcare Centre, available at St. Davids Public School approximately 870 metres from the subject land. According to Ontario Ministry of Education, the Way to Grow Childcare Centre in St. Davids has the capacity to accommodate a total of 74 children with only 24 spots for children of preschool age and the remainders for kindergarten and primary/junior school age groups.

Table 2 Increase in Child Population between 2016 and 2021 in St. Davids

Indicator	Reported Figure (2016)	Reported Figure (2021)	% Change (2016-21)
Population	2,949	3,635	23.30%
Private households	1,235	1,453	17.70%
Children aged 0-4	125	155	24.00%
Children aged 5-9	120	180	50.00%
Children aged 10-14	150	160	6.70%
Total children aged 0-14	395	495	25.30%
Average children per family with children	-	1.8	N/A

Source: Statistics Canada

As presented at the Committee meeting on August 20, we continue to believe the proposed daycare centre would be an important and welcoming addition to the community because it not only provides supervision, care, and early childhood education for young children, but also enables parental employment, attracting young families, creating local jobs, and reducing parents' commute times and missed days at work.

Traffic Impact

To respond to Committee member's questions, we have also retained the service of Paradigm Transportation Solutions Ltd. to better understand the transportation implications of the proposed 64-child daycare centre with approximately 341 m² of Gross Floor Area (GFA). The consultants have assessed traffic generation, site access, parking, pick-up/drop-off, intersection operations, collisions, and the need to further separate the outdoor play area from Four Mile Creek Road. The following is a summary of their findings.

- The proposed daycare is forecasted to generate approximately 40 trips during AM peak-hour and 39 trips during PM peak-hour. Compared with the previous restaurant use within the same unit, the daycare is expected to generate approximately 7 additional trips during AM peak hour and 5 additional trips during PM peak-hour, equivalent to approximately one additional vehicle every 8 to 12 minutes.
- Daycare pick-up and drop-off activity is expected to be distributed over several hours, with short vehicle dwell times, and can be accommodated within the existing commercial plaza without vehicles queuing on Four-Mile Creek Road.
- Traffic counts conducted in September 2026 indicate relatively low truck activity on Four-Mile Creek Road, with trucks representing approximately 2.55% of northbound traffic and 3.00% of southbound traffic.
- Intersection levels of service (LOC) at the Four-Mile Creek Road/Line 9 Road is acceptable with substantial spare capacity. LOC is a measurement based on the average delay each vehicle experiences at an intersection ranging from A (best) to F (worst). Under 2031 total traffic conditions, it is projected to operate at LOS C or better, which does not warrant an all way stop under 2031 total traffic conditions. The two plaza driveways are projected to operate at LOS A and LOS B or better, including the proposed daycare traffic.
- The existing site provides 45 parking spaces, including two barrier-free spaces, which is sufficient to accommodate the proposed daycare. The parking supply satisfies the Town of Niagara-on-the-Lake Zoning By-law 4316-09 requirement of 1.00 space per 18.5 m² of GFA for a daycare use.
- The existing commercial plaza currently operates with a pharmacy, Pilates studio and dental office. An on-site parking survey found a maximum utilization of 29% (13 of 45 spaces) leaving 32 spaces available at peak observed demand.
- Forecast daycare demand was assessed using both the ITE Parking Generation Manual, 6th Edition, and parking utilization data from a daycare centre in Brampton. The ITE analysis forecasts approximately 8 to 12 spaces, while the proxy site indicates a peak demand of approximately 9 spaces. Applying the ITE 85th-percentile demand of 12 parking spaces would leave approximately a 20 space surplus, while utilizing the proxy demand data would leave approximately a 23 space surplus. Accordingly, no additional parking supply is required to accommodate the proposed daycare.
- To support efficient pick-up and drop-off operations, courtesy/etiquette signages for up to 7 parking spaces for daycare pick-up and drop-off between 7:00–9:00 AM and 4:00–7:00 PM are recommended. This signage would encourage short-term use by parents and caregivers during peak periods while preserving the remaining parking supply for other commercial uses.
- Based on collision data for 2020 to 2025 for the Four-Mile Creek Road and Line

- 9 Road intersection provided by Niagara Region, there is no indication that the adjacent intersection is a high collision-prone location.
- Although no traffic operational or collision-related concerns were identified, the proximity of the proposed outdoor play area to Four Mile Creek Road warrants consideration of physical separation treatments, such as bollards or a similar barrier, to reduce, in very rare cases, unintended vehicle encroachment into the play area.

I have attached the Paradigm report to this letter in case you are interested in the methodology and detailed analyses.

Protecting the Outdoor Play Area

We have engaged LLA Architecture+ to update the site plan following the Paradigm recommendation, with bollards to be installed between the play area and the Four-Mile Creek Road. Inspiration images of creative bollard designs, including colourful and crayon-inspired options, are attached for your consideration, which would complement the daycare setting and enhance the streetscape.

Policy and regulations

We have further looked into the Town's Official Plan and agree with Town staff that "community facilities including but not limited to daycare facilities are permitted to locate in Commercial areas in accordance with the applicable policies" under "Special Policy Area A-3 - St. Davids" (the "Special Policy Area"). On some more specific comments, however, we believe the Town's Official Plan should be read in its entirety so that decision-makers can understand how all policies work together rather than applying individual rules in isolation. For example, the policy raised in the staff report relating to use of ground floors for commercial purposes is intended to direct uses that do not serve the general public to upper floors. A daycare centre serves the general public, and permitting the proposed use at grade maintains the general intent and purpose of this policy as well as the Official Plan.

The subject lands are zoned "Village Commercial (VC-30)" in the Town's Zoning By-law, which defines "Commercial Establishment" or "Commercial use" as "... buying and selling of commodities, the rental of goods and materials, and the supplying of services to the general public, ...". We believe daycares do supply services to the general public. Thus and pursuant to s. 45(2)(b) of the Planning Act, a daycare can be permitted as it is "defined in general terms", if Committee members see it fit:

"(b) where the uses of land, buildings or structures permitted in the by-law are defined in general terms, may permit the use of any land, building or structure for any purpose that, in the opinion of the committee, conforms with the uses permitted in the by-law. R.S.O. 1990, c. P.13, s. 45 (2)."

Based on all the additional analyses as directed by the Committee of Adjustment, I continue to believe the zoning relief we are seeking in this application is minor in nature, desirable and appropriate, and maintains the general intent and purpose of the Town's Zoning By-law and its Official Plan. The proposed daycare centre should be permitted and would be a welcoming addition to the growing community of St. Davids.

Thank you again for your consideration and happy to further discuss to make sure community members understand our application and Committee members make an informed decision.

Yours truly,

A handwritten signature in black ink, appearing to read 'Haiqing', with a long, sweeping tail stroke extending downwards and to the right.

Haiqing Xu, PhD MCIP RPP
Senior Vice President, Development & Planning
Solmar Development Corp.
(On behalf of Northern Capital Corp.)

Encl.

cc: Nimrit Chahal, Planning Coordinator, Solmar Development Corp.
Sara Premi, Partner, Sullivan Mahoney LLP
Jesse Auspitz, Principal Planner, NPG Planning Solutions Inc.
Adam Makarewicz, Senior Project Manager, Paradigm Transportation Solutions Ltd.

Fixed Bollard Concept to Protect the Daycare Play Area

