

PLANNING JUSTIFICATION REPORT

10627 GLENDON DRIVE

**Auburn Developments Inc. on behalf of
2817053 Ontario Limited**

September, 2025

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1.0 Introduction

On behalf of the owner, 2817053 Ontario Limited, Auburn Developments has prepared this Planning Justification Report to support a request for redesignation of the subject lands in the Official Plan of the Municipality of Middlesex Centre (Middlesex Centre OP / OP).

Based on comprehensive field study of the subject lands by the consultant team, a redesignation to “Medium Density Residential” on Schedule A and removal of the “Significant Woodlands” overlay on Schedule B of the Middlesex Centre OP is warranted. A Development Assessment Report (DAR) has been prepared by MTE Consultants to provide a detailed ecological background in support of the request. A memo, also prepared by MTE Consultants, is also being submitted and references the adjacent approved development on abutting lands at 6-10 Elmhurst Street.

2.0 Site Overview

The subject lands are located in the Kilworth settlement area in the municipality of Middlesex Centre in Middlesex County and are municipally addressed as 10627 Glendon Drive. The lands are legally described as Part of Lot 10, Concession 1 N, being Parts 2 and 4 on 33R-11236. They are located at the southwest corner of the intersection of Glendon Drive and Elmhurst Street, west of Kilworth Park Drive. The lands are approximately 3.3 acres and have 175m of frontage on Glendon Drive.

The lands abut existing low-rise residential uses to the west and an approved (unbuilt) medium-density residential development to the south. There are commercial uses just west of the site at the intersection of Glendon Drive and Kilworth Park Drive.

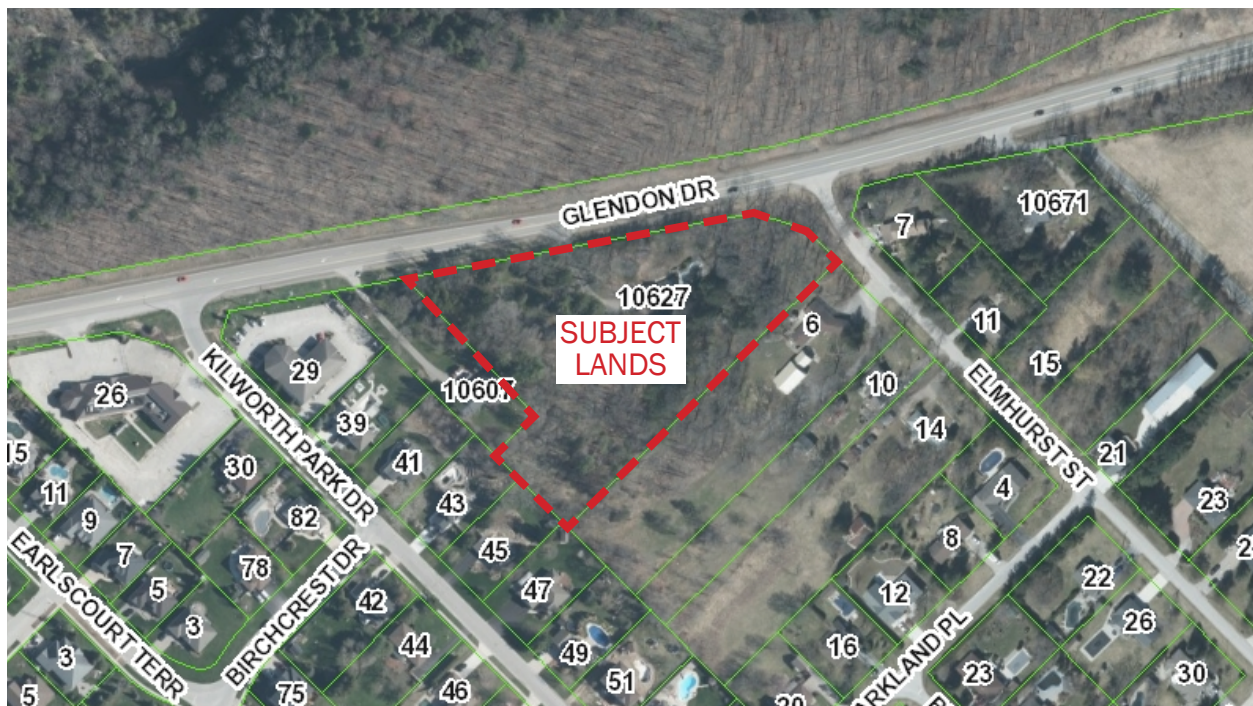


Figure 1: Subject lands location on Glendon Drive in Kilworth

In the Middlesex Centre OP (Schedule A), the lands are presently split-designated as “Low Density Residential” and “Natural Environment” and have a “Significant Woodlands” overlay on Schedule B. Surrounding land use designations include “Low Density Residential”, “Medium Density Residential” and “Settlement Commercial” with lands across Glendon Drive designated as “Natural Environment”. Figure 2 below shows an excerpt of Schedule A from the OP.

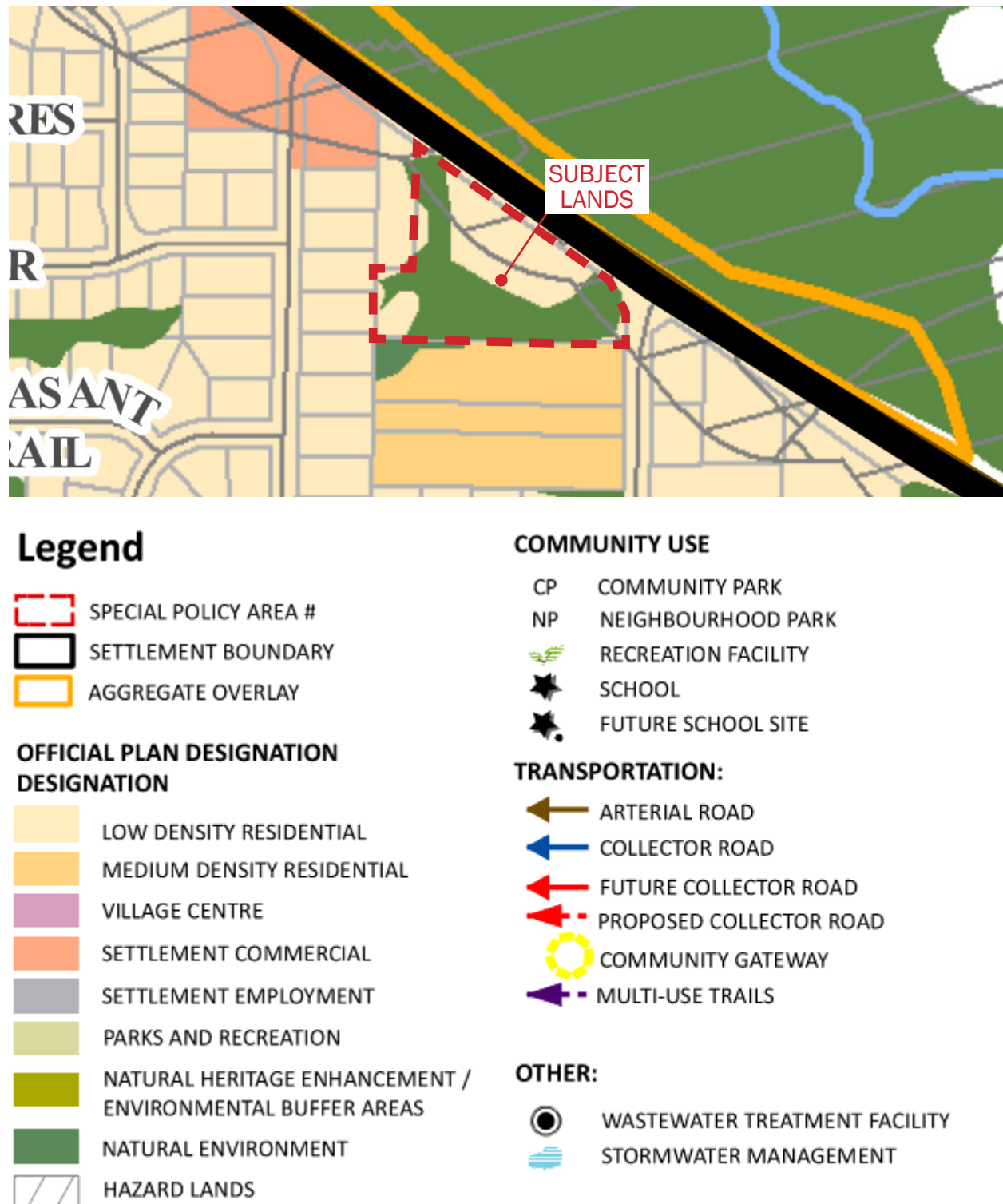


Figure 2: Schedule A from Middlesex Centre Official Plan, subject lands land use designations

3.0 Proposal

The application being advanced at this time is an Official Plan Amendment to change the land use designation of the subject lands from “Low Density Residential” and “Natural Environment” to “Medium Density Residential”. It is also being requested that the “Significant Woodlands” overlay on Schedule B of the OP be removed from the subject lands on the basis of the analysis contained within the appended DAR completed by MTE Consultants. The “Medium Density Residential” designation is requested in recognition of the locational attributes of the subject lands including frontage on Glendon Drive, availability of servicing and proximity to commercial and recreational amenities.

A Zoning By-law Amendment (ZBA) application will be advanced in the future and will provide specific details for proposed development. Assuming a ZBA is approved, an application for Site Plan Approval will then provide even greater details for a specific development proposal. This application is limited in scope to the

4.0 Technical Studies

In support of the proposed re-designation, a Development Assessment Report was prepared by MTE Consultants. Given the request for the removal of the “Natural Heritage” and “Significant Woodlands” designations on the subject lands, a site specific ecological assessment was necessary to determine whether the current environmental designations, which were established without any supporting site-specific ecological study, are appropriate.

Any future development application will require a full detailed design package which includes technical support for proposed development. The principle of development has been established through the current “Low Density Residential” designation which reflects the current use of the lands. This application seeks implementation of the findings of the DAR which recommends removal of the “Natural Heritage” designation and “Significant Woodlands” overlay, clarifying that the lands are not ecologically constrained for development.

5.0 Provincial Planning Statement (PPS, 2024)

In accordance with Section 3 of the Planning Act, the Province of Ontario issued the Provincial Planning Statement (PPS) in August of 2024 and the document came into force and effect on October 20, 2024. The PPS is a guiding document for all planning and land use matters in Ontario. All land use planning decisions made in Ontario must conform to the PPS.

The Natural Heritage policies of the PPS are contained within Chapter 4: Wise Use and Management of Resources. Given that the subject application is essentially a technical exercise to remove land use designations which have been found to be unwarranted or inappropriate based on detailed ecological study of the site, the Natural Heritage policies of the PPS are the only part of the PPS that will be evaluated in this report. As stated previously, the principle of residential development for the subject lands has already been established. A future zoning by-law amendment application will address other aspects of the PPS.

PPS Section 4.1 - Natural Heritage

1. Natural features and areas shall be protected for the long term.
2. The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.
3. Natural heritage systems shall be identified in Ecoregions 6E & 7E 1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.
4. Development and site alteration shall not be permitted in:
 - a) significant wetlands in Ecoregions 5E, 6E and 7E1; and
 - b) significant coastal wetlands.
5. Development and site alteration shall not be permitted in:
 - a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;
 - b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
 - c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
 - d) significant wildlife habitat;
 - e) significant areas of natural and scientific interest; and
 - f) coastal wetlands in Ecoregions 5E, 6E and 7E1 that are not subject to policy 4.1.4.b), unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.
6. Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.
7. Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.
8. Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.
9. Nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue.

The PPS requires that Significant Woodlands be protected from development, per PPS Policy 4.1.5. Given the present designation of the subject lands as being partially designated “Natural Environment” and the same area having the “Significant Woodlands” overlay on Schedule B of the Middlesex Centre OP, detailed ecological study of the subject lands was required to determine development potential in conformity with the PPS.

The principal finding of the DAR completed by MTE Consultants is that the wooded area on the subject lands does not constitute a “Significant Woodland” under provincial or local policy or guidelines. The Natural Heritage Reference Manual and Middlesex Natural Heritage Systems Study guidelines for ecological study and classification guided the analysis by MTE Consultants. Given the intervening road corridor (Glendon Drive - County Road 30m ROW), the subject lands also do not qualify as “adjacent lands” per 4.1.8 of the PPS.

It has been confirmed that, due to the lack of woodland integrity and floristic quality and given the physical distance between the subject lands and the larger woodland complex north of Glendon Drive, the wooded area on the subject lands does not meet the threshold for inclusion in the Greenlands Network (OP Schedule B) as a “Significant Woodland”. Accordingly, the “Natural Environment” designation on Middlesex Centre OP Schedule A should be revised to a suitable land use designation.

Summary of Analysis - Provincial Planning Statement

As the lands do not constitute a Significant Woodland or “adjacent lands” under the PPS, the lands are not protected from development. Future development applications for residential development can be assessed on their planning merits under the applicable provincial and municipal framework.

6.0 Official Plan of the Municipality of Middlesex Centre

6.1 Middlesex Centre Natural Heritage Policies

Section 3.0 of the Middlesex Centre Official Plan includes various policies dealing with natural heritage and environmentally sensitive areas. The policy framework emphasizes the protection and enhancement of natural features within the municipality in balance with the need for new development within a growing community.

Section 3.3 states that Schedule A includes the “Natural Environment” land use designation which includes any of wetlands, significant habitat of endangered or threatened species or floodplains and flood prone areas as mapped by a Conservation Authority. This section provides for site-specific delineation of “Environmental Areas” through a report such as a Development Assessment Report, completed to the satisfaction of the municipality in consultation with appropriate agencies.

Policy 3.4 of the OP details the “Greenland Features” overlay, being Schedule B of the Official Plan. The “Greenlands” overlay is communicated as not having status as a land

use designation but rather a means of raising awareness of the importance of the natural environment. “Greenlands” areas are primarily composed of Significant Woodlands as identified through the Middlesex Natural Heritage Systems Study (MNHSS). The MNHSS was completed through a desktop review of aerial photography from 2010 to develop a landscape level assessment of natural heritage features and functions within the county.

Given that the MNHSS did not include detailed study of any lands, a DAR must be completed for lands identified through the study as having potential significance prior to development. In accordance with Middlesex Centre Official Plan policy 3.4, MTE Consultants completed a DAR for 10627 Glendon Drive to assess the potential significance of the woodland and whether the subject lands constitute significant wildlife habitat. The guidelines for the preparation of a DAR are outlined in Policy 3.8 of the Official Plan. The DAR is appended to this report in support of the requested change in land use designation.

6.2 Middlesex Centre Settlement Area Policies

Policy 5.1 of the Middlesex Centre OP identifies Komoka-Kilworth as an Urban Settlement Area. Urban Settlement Areas are the highest intensity urban areas within Middlesex Centre. Policy 5.1.1 of the OP states that all new development within Urban Settlement Areas shall be municipally serviced. Improvements on Elmhurst Street will provide full servicing to the subject lands at the east property limit. A plan and profile drawing, provided to the applicant by the municipality, is appended to this report identifying

Policy 5.2.3 includes policies related to Multiple Dwellings within Residential Areas. A future development proposal for medium-density development will provide specific details for development as some form of medium-density residential use. Given the site’s location along Glendon Drive, the abutting approved medium-density residential development to the south, and proximity to commercial and recreational amenities, medium-density development is appropriate in this context.

Policy 5.7.4 of the OP speaks to the two residential land use designations within the Komoka-Kilworth settlement area. The OP provides for both “Low Density” and “Medium Density” residential uses, with the differentiating factor being the proposed density expressed in units per hectare. “Low Density Residential” is for anything less than 20 units per hectare, while “Medium Density Residential” allows for development between 20 and 50 units per hectare.

Policy 5.7.4 includes general design policies for the Residential areas within Komoka-Kilworth that will need to be addressed as part of a specific development application in the future.

Summary of Analysis - Official Plan of the Municipality of Middlesex Centre

This application includes a DAR prepared by MTE Consultants based on the requirements for a DAR as outlined in the Middlesex Centre Official Plan. The findings of the DAR confirm that the portion of the lands at 10627 Glendon Drive currently designated as “Natural Environment” on Schedule A and shown as “Significant Woodland” on Schedule B do not meet the threshold of significance for inclusion on those two schedules as protected environmental area. Therefore, a more appropriate residential land use designation is requested based on the locational attributes of the subject lands.

7.0 County of Middlesex Official Plan

The County of Middlesex Official Plan (County Official Plan / County OP) includes policies related to natural heritage under Policy 2.3.10. The County OP mirrors the development prohibitions of the PPS with respect to significant natural features.

Schedule C of the County Official Plan identifies “Natural Heritage Systems” on the subject lands with a similar delineation as seen in Middlesex Centre Official Plan Schedules A and B. Figure 3 below shows an excerpt of Middlesex County OP Schedule C.

Policy 2.3.10 states that when an application for lands with identified Natural Heritage Features is submitted, it must be accompanied by a Development Assessment Report. Based on Middlesex Centre policy, the requirements within the Middlesex Centre OP for completion of a DAR supercede those within the County OP.

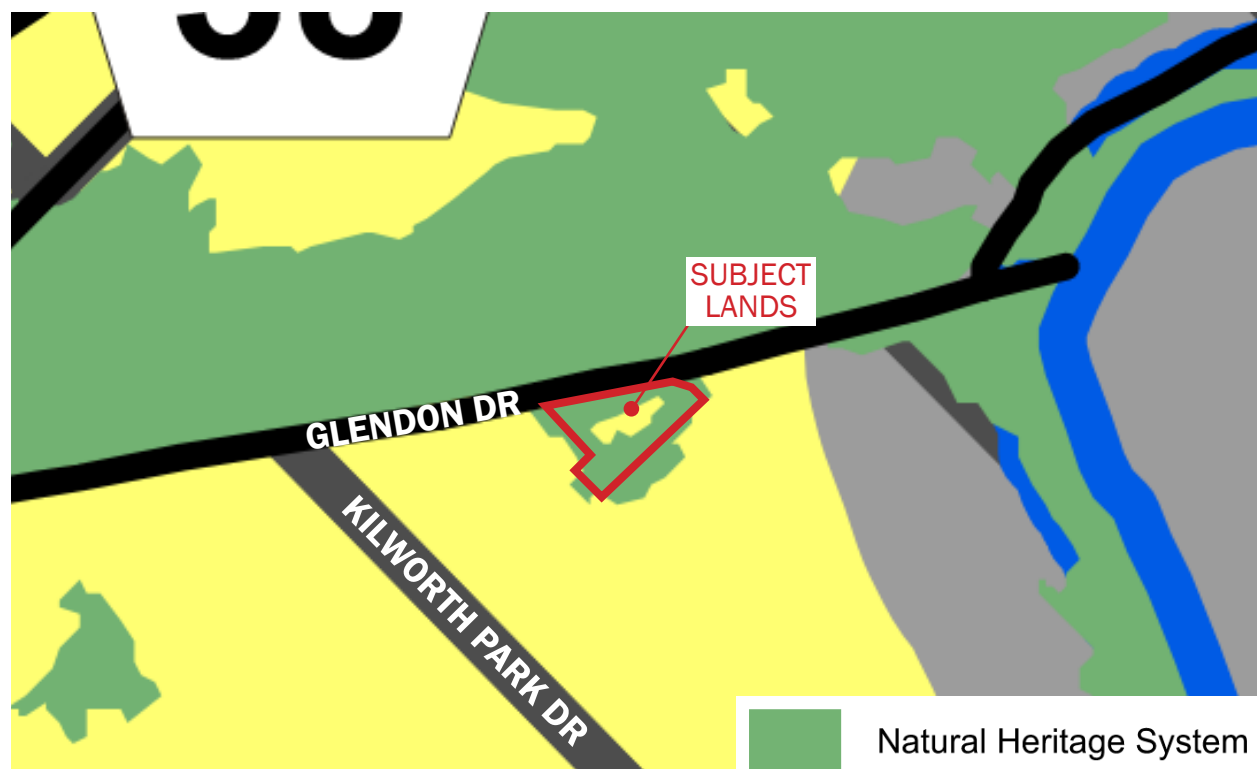


Figure 3: Schedule C from Middlesex County Official Plan

Summary of Analysis - County of Middlesex Official Plan

Given the superceding policies respecting DARs in the Middlesex Centre OP, much of the natural heritage policy framework of the County OP is not relevant to the subject lands.

Schedule C of the County Official Plan should be updated to reflect that the wooded area on the subject lands does not constitute a Significant Woodland as originally mapped through the MNHSS.

8.0 Summary of Planning Rationale

The subject application is quite scoped in nature, solely related to the topic of natural heritage and whether the existing land use designations and official plan mapping is appropriate. To confirm whether the wooded area on the subject lands was in fact a Significant Woodland, a Development Assessment Report was prepared by MTE Consultants. The DAR was prepared following comprehensive field study on the subject lands to assess the natural heritage qualities of the wooded area.

The outcome of the field study program, as communicated through the DAR, confirms that the subject lands do not contain a significant woodland nor do they contain significant wildlife habitat. Although currently mapped and designated as such, this was completed on the basis of desktop study completed through the Middlesex Natural Heritage Systems Study (MNHSS).

The MNHSS did not include site-specific ecological investigations which are required to confirm whether the Significant Woodland actually exists. Given the outcome of the field study program, it is requested that the land use designation of the subject lands in the Middlesex Centre Official Plan on Schedule A be changed to “Medium Density Residential” from its current split designation of “Low Density Residential” and “Natural Environment”. It is also requested that Schedule B of the Middlesex Centre Official Plan be revised to delete the “Significant Woodlands” overlay from the subject lands and to remove the subject lands from the “Greenlands Network”.

9.0 Appendices

1. Development Assessment Report, MTE Consultants (April, 2025)
2. Memo re: Adjacent Lands DAR (Elmhurst St Lands), MTE Consultants (September, 2025)
3. Plan and Profile Drawing - Elmhurst Street Reconstruction, AECOM (January, 2025)